
RIGHT TO FOOD IN INDIA: A CRITICAL REVIEW OF LEGAL, POLICY AND JUDICIAL FRAMEWORKS

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ABSTRACT

The right to food is a fundamental human entitlement that is essential for ensuring survival, dignity, and social justice. In India, this right has been judicially interpreted as an integral component of the right to life under Article 21 of the Constitution. Despite the existence of various welfare schemes and policy measures, the persistence of hunger and malnutrition highlights serious gaps in implementation. Over the years, India has adopted several policies and welfare schemes to address hunger and malnutrition. The programs include “Public Distribution System (PDS) and its sub-programs (Annapurna Scheme and the Anthodaya Anna Yojana, a foodgrain price stabilization programme, food-for-work programmes such as the Jawahar Gram Samridhhi Yojana/Jawahar Rojgar Yojana (JGSY/JRY) and the Employment Assurance Scheme (EAS), The mid-meals programme and a number of direct nutrition programmes – Integrated Child Development Services, Balwadi Nutrition Programme, Day Care Centres Scheme, and Vitamin A and Iron Distribution programmes that are linked with the ICDS.”

This paper critically examines the constitutional foundation, international obligations, judicial developments, and policy mechanisms related to the right to food in India. It further evaluates the challenges in enforcement and proposes measures to improve the effectiveness of food security governance.

Keywords: Right to Food, Article 21, Food Security, Public Distribution System, Judiciary, Welfare Schemes.

Introduction

Access to adequate food is a basic requirement for human survival and a necessary condition for leading a life with dignity. In the Indian context, the right to food has not been explicitly codified as a fundamental right; however, judicial interpretation has expanded the scope of Article 21 to include this essential entitlement.

Over the years, India has adopted several policies and welfare schemes to address hunger and malnutrition. Nevertheless, the continued prevalence of food insecurity indicates that the issue extends beyond mere availability of food to concerns relating to distribution, accessibility, and governance. This study seeks to analyse the legal and institutional framework governing the right to food and to assess the role of the judiciary in ensuring its realization.

Statement of Problem

The problem of hunger even though is a global issue, yet it is rampant in the developing countries, such as our own nation, India. The problem of starvation and malnutrition due to hunger needs to be dealt with not only on a state level but on a national level, with social, economic and political policies. The study analyses the steps taken and the implementation and operation of those policies and further examines the role court has played in its legal implementation.

Methodology

Literature Review

The right to food has evolved as a critical component of human rights discourse, both at the international and domestic levels. Scholarly literature on this subject reflects a multidisciplinary approach, combining constitutional law, public policy, economics, and social justice perspectives. The existing body of work highlights the transformation of the right to food from a moral obligation into a legally enforceable right, particularly in the Indian context.

Early academic contributions, such as those by **Jean Ziegler**, emphasize that the right to food is not merely a matter of charity but a question of justice and state accountability. Ziegler conceptualizes hunger as a violation of human rights, asserting that governments are obligated to ensure access to adequate food for all individuals. This perspective aligns with the

framework established under the International Covenant on Economic, Social and Cultural Rights (ICESCR), which recognizes the right to food as a fundamental human entitlement.¹

But even with this substantial statutory framework, there are still a lot of obstacles to overcome before these duties can be effectively implemented at the national level, especially in developing nations like India.

Scholars like **Henry J. Steiner and Philip Alston** have further elaborated on the international human rights framework, arguing that socio-economic rights, including the right to food, impose threefold obligations on states—namely, the duties to respect, protect, and fulfil. Their work provides a theoretical foundation for understanding state responsibility in addressing hunger and malnutrition. However, they also acknowledge the practical challenges in enforcing such rights, especially in developing countries where resource constraints and governance issues persist.²

This draws into question whether structural disparities and government's ability concerns in enforcing socio-economic rights are sufficiently taken into consideration by the current human rights framework.

In the Indian context, **Mahendra Dev** of **Indira Gandhi Institute of Development Research** concluded that the authorities may support rapid expansion and offer direct initiatives to create profitable jobs, which will guarantee the right to food.³

However, because it mostly relies on driven by markets accessibility and ignores concerns of inequality, food distribution, and state welfare commitments, this strategy may have limitations.

Similarly, **“Dr. Sultan Singh Jaiswal”**, Associate Professor **Department of Commerce Govt. College Dhaliara Kangra** concluded that the effects of globalization on the agriculture reforms put pressure on the government to revisit their earlier policies and make amendments to them. He points out that despite surplus food production; food insecurity remains a major concern

¹ Jean Ziegler, *The Right to Food: Report of the Special Rapporteur on the Right to Food*, U.N. Doc. E/CN.4/2001/53 (Feb. 7, 2001)

² Henry J. Steiner, Philip Alston & Ryan Goodman, *International Human Rights in Context: Law, Politics, Morals* 325–30 (3d ed. 2007)

³ Mahendra Dev, “Right to food in India”, September 2003, at, (PDF) Right to food in India (researchgate.net). 22/03/2026

due to structural inequalities and policy shortcomings. His work suggests that reforms in agricultural policy and better resource allocation are necessary to address the persistent challenges of hunger.⁴

This viewpoint also raises questions about whether policy changes by itself are adequate in the absence of improving rights-oriented food security measures and addressing more significant structural imbalances.

Legal scholars such as **Sanjeeve Gowda** have explored the constitutional dimensions of constitutional entitlement to nutrition in the country. According to Gowda, the Indian judiciary has been instrumental in making the entitlement to nutrition a basic right by interpreting Article 21 expansively. His analysis of landmark judgments demonstrates how courts have bridged the disparity between actionable basic liberties and the Guidelines of State Policy. However, he also critiques the limited impact of judicial pronouncements in the absence of effective implementation mechanisms.⁵

Additionally, he questions the extent to which judicial advocacy alone can guarantee the accomplishment of rights in society and the economy by denouncing the constrained effect of such orders from the courts in the absence of efficient procedures for their enforcement.

Research Methodology

The Research Paper makes use of Doctrinal analysis for interpreting court rulings and constitutional provisions. Comparison of Indian implementation with international norms. Also analyzing policy implementation and governance deficiencies critically.

Research Questions

1. How extensively does the Indian government apply guidelines and laws to preserve rights pertaining to adequate food?
2. Does the Law of the land uphold the liberty of consuming food as a basic privilege?

⁴ Dr. Sultan Singh Jaiswal, "Challenges of Food Security in India", *IOSR Journal of Humanities and Social Science*, Volume 19, Issue 4, Ver. II, April 2014, pp 93-100.

⁵ Sanjeeve Gowda, *Right to Food in India: A Constitutional Perspective*, 3 Int'l J.L. & Legal Juris. Stud. (2016).

3. To what extent does the judicial branch contribute to its execution?

United Nation's Perception on Right to Food

“Hunger is not an issue of charity. It is an issue of justice. Striving to ensure that every child, woman and man enjoys adequate food on a regular basis is not only a moral imperative and an investment with enormous economic returns; it also signifies the realization of a basic human right.”

~ Jacques Diouf

An essential human right is being free from starvation, no person deserves to live in a state of starvation or struggling to purchase meals. The United Nations has reported that a lot of men, women and children suffer from ‘chronic undernourishment’, that the “UN Food and Agriculture Organization” termed as ‘extreme hunger’. When a person has acute hunger, their daily calorie count is less than what is required for existence.⁶ Malnutrition is one of the biproducts of hunger and starvation that leads to poor immunity due to lack of nutrients in the body and attracts various diseases. Hence, for a person to avail their right to life, they first need to have access to food for basic survival. The right to food is clearly defined by “Committee on Economic, Social and Cultural Rights” which states that *“the right to adequate food is realized when every man, woman and child, alone and in community with others, has physical and economic access at all times to adequate food or means for its procurement”*

This universal human rights approach has gained abundant attention from all the nations yet the policy-oriented approach still remains as a backhand concern. The policy program is not gaining enough support as it adds an element of accountability by which the states would particularly be forced to protect the interest of their citizens. The ‘Rights’ approach is not always resourceful to solve this issue of being malnourished or starving, as not all cases of food insecurity and malnutrition are caused by human rights abuses. However, violations happen when states fail to uphold, defend, or fulfill the right to adequate food, and this is one of the main reasons why hunger and malnutrition continue to exist.⁷ The “International Covenant on Economic, Social, and Cultural Rights (ICESCR)” under Article eleven obligates the nations should guarantee the right to sufficient meal supplies and freedom from starvation. Article 11

⁶ Jean, *supra* note 1.

⁷ Sanjeeve, *supra* note 5.

reads that the states are under:

- “States that are parties are required by the commitment to respect existing access to adequate food to refrain from taking any actions that would hinder this access.
- The Government must take action to guarantee that corporations or individuals refrain from denying people access to sufficient food as part of the commitment to protection.
- The States must actively participate in initiatives meant to improve individuals’ accessibility to and use of resources and means to guarantee their livelihood, including food security, in order to fulfill their commitment to fulfill. Additionally, states are required to directly fulfill the right to enough nourishment whenever a person or group is unable to exercise this right due to circumstances beyond their control.”⁸

In addition to being an inherent right, the right to adequate food is also a matter of financial, civilized and folk policy. Hence the UN committee had requested the states to establish a conventional definition of an “adequate standard of living”.

Policy Implementations and Problem Faced by the Government in India

India has progressively attempted to boost people's access to and enough of food and nourishment. Mostly, the problem of inaccessibility takes place among poor people. Hence the government has constantly addressed its obligation to fulfil and provide for the people. The Centre and the state government has constantly implemented programs in order to resolve the issue of hunger and starvation and providing necessary resources to the poor and vulnerable group of people. The programs include “Public Distribution System (PDS) and its sub-programs (Annapurna Scheme and the Anthodaya Anna Yojana, a foodgrain price stabilization programme, food-for-work programmes such as the Jawahar Gram Samridhhi Yojana/Jawahar Rojgar Yojana (JGSY/JRY) and the Employment Assurance Scheme (EAS), The mid-meals programme and a number of direct nutrition programmes – Integrated Child Development Services, Balwadi Nutrition Programme, Day Care Centres Scheme, and Vitamin A and Iron

⁸ FIAN India, Parallel Report The Right To Adequate Food in India, ICESR 40th session (2002), http://www.fian.org/fileadmin/media/publications_2015/The-Right-to-Adequate-Food-in-India-2008.pdf

Distribution programmes that are linked with the ICDS.”⁹

Public Distribution System (PDS) introduced by the government to improve the condition of food security in households. The program subsidises the rates of essential commodities such as wheat, sugar, and vegetable oil.

Issue with Implementation : The issue with the programme was that the PDS policy was not operated with the concentration to act as an anti-poverty programme but it was merely implemented for price stabilisation of the commodities. PDS was also only found in cities and locations with a food shortage, and not focused on the rural area until early 1980’s. The use of it to stabilise price in private trade did not restructure the adequacy of food.

The current problems with PDS for the poor are :

- I. **The inconsistent diversion of commodities.** A study conducted for evaluation of PDS supplies by Tata Economic Consultancy Services showed that “36% of wheat supplies, 31% of rice, and 23% of sugar” were switched directions with more supplies moving to the Northern and Eastern and Northeastern part of India in comparison to Southern and Western regions.
- II. **The reach and approach of PDS does not effectively impact the poor.** According to Parikh (1994), "the cost effectiveness of reaching the poorest 20% of households through PDS cereals is very small." In all states, the poor receive less than 22 paise for every rupee spent, with the exception of Goa, Daman, and Diu, where the poor receive 28 paise. This is merely to highlight the huge expense of this support, not to imply that PDS does not help the poor at all.¹⁰ The cost-effectiveness was poor due to weak targeting of the public or no targeting at all.
- III. Due to poor targeting the poor states have not benefitted, due to mistargeting or urban bias.
- IV. The Targeting needs to have a test to narrow down the poverty line and population, but the problem with the test is that it is income based that might make it difficult to indicate

⁹ Mahendra, *supra* note 3.

¹⁰ Sanjeeve, *supra* note 5.

the target. Errors in inclusion and exclusion result from it.¹¹ While the latter inaccuracy pertains to the inclusion of non-poor, the former refers to the exclusion of the poor. Under TPDS, both mistakes appear to be high. Using creative programs to reduce errors is a problem.¹²

Annapurna Scheme provides 10 kilos of grains to indigent senior citizens per month, who are living alone. The scheme was approved in 2000 budget. It is intended for people who live alone in the same village without children who are eligible for an old age pension but do not receive one. Its implementation is under the purview of the Ministry of Rural Development. FCI estimates that 166,000 tons of food grain are needed annually at reasonable pricing”.¹³

Issue with Implementation: The scheme after a decade is still not ready for evaluation, and hence there is no proper record of the implementation value.

Antyodaya Anna Yojana, the programme addressed the poor which were identified by the gram panchayats and gram sabhas. People covered under this yojana possess unique allowance credentials cards and are purportedly eligible for 35 kg of grains each month at highly subsidised rates, that is, Rs. 2 per kg for wheat and Rs. 3/kg for rice. The surveys in different states lead to the conclusion that this programme performed well as compared to PDS.

The problems with the programme: Due to large quantity and illiteracy of the people, in some villages the households did not receive their entitled grains and the dealers continued to take advantage.

Wage Employment Programmes are Food for Work programmes, that include number of government plans like Jawahar Gram Samridhi Yojana (JGSY), Employment Assurance Scheme, Swarnjayanti Gram Swarozgar Yojana and Food for work plan. These plans range from 1 kilo to 5 kilos of grains per person per workday, to not only make food accessible but also employ the people. The program could help people out of poverty while combatting malnutrition and hunger.

Issues with the government implementation

- i. The resources were very scarcely distributed among the people to increase employment and

¹¹ *Id.*, at 10.

¹² *Id.*, at 11.

¹³ *Id.*, at 12

duration of employment but there was no developmental strategy as per the work.

- ii. The hiring process period fell during the farming cycle.
- iii. Intervention of the government on labour exert unwanted pressure on market wages.
- iv. The government did not consider insufficient employment.

Nutrition Programme address the severe malnourishment among children and women. The nutrition plan constitutes two schemes “Integrated Child Development Services (ICDS)” and “National Programme for Nutritional Support to Primary Education (NPNSPE)”. ICDS provides nutrition and aims to provide meals and obtain the necessary medical supplies from state health officials to strengthen the nutritional and overall wellness of young people aged 0 to 6. Additionally, it seeks to provide supplementary nutrition to expectant and nursing mothers as well as early childhood education for their children's cognitive and social growth.

Limitations of ICDS;

- i. The abundance of demand in the services of the programme led to difficulty in delivery and quality of the services and hence failed to detect and manage undernourishment.
- ii. No attention was given to children above age of 6.

The NPNSPE promotes nourishment and punctuality of the nation's elementary school students and offers mid-day snacks with the goal of encouraging children to enroll in school and boosting participation by enhancing their dietary requirements.

In conclusion, the major problem includes “Untargeted food supplementation, the targeting shall be improved for insufficient targeted strategies for the avoidance of excessive nutrient intake to the encouragement of proper standards of living and nutrient consumption for the avoidance and control of excessive nutrient intake and weight gain; screening of all individuals from vulnerable groups, identification of those with various grades of deficiencies and suitable control.”¹⁴

Constitution of India

India has known and been constantly trying to battle with the issue of extreme hunger for

¹⁴ *Id.*, at 13.

decades. The cause of hunger and starvation in India can be low standards of living, due to a large population in India sustaining in below poverty line conditions, the other cause can be the constant natural disasters such as floods, draughts, famine that force people to live on the edge, vulnerable and exposed to hunger. The country ranks 94th on the global hunger index with 27.2 percent of population suffering the problem of hunger and starvation, as compared to 2000 when the percent was 38.9.¹⁵ India is constantly making progressive changes to overcome, by producing food and being self-sufficient to legally implementing rights. A broad range of privileges for humans is included in the Indian Law of the land in order to safeguard the interests of its citizens. Article 21 of the founding document of India the principle of the "Right to Existence," which is classified as a core right. The precedents define this privilege as the "the right to live with human dignity and all that goes with it, namely, the bare necessities of life such as adequate nutrition"¹⁶ The national human rights commission mentioned that the human existence under Article 21 should be read with Article 39 clause (a) and Article 47 to impose obligation on the Executive. As per Article 39 clause (a) of the Law of the land, "enunciated as one of the Directive Principles, fundamental in the governance of the country, requires the State to direct its policies towards securing that all its citizens have the right to an adequate means of livelihood"¹⁷ while A "the obligation of the administration to strengthen standards of nourishment and the quality of existence and foster better community wellness" is established by Article 47, a positive right given under Law of the land." However, even now most of the developments in the right to food have been made under Article twenty one. The access to meals is guaranteed under the law of the land, the practice is not unique, as other state constitution's guarantee similar obligations. "According to the Food and Agricultural Organization of the United Nations, twenty-two national constitutions explicitly mention a right to food that applies to the entire national population, while several other Constitutions provide for a right to food through a right to life with dignity or related social welfare rights."¹⁸

¹⁵ 2020 Global Hunger Index by severity.

¹⁶ Francis Coralie v. Union Territory of Delhi 1981 AIR 746:1981 SCR (2) 516:1981 SCC (1) 608; Maneka Gandhi v. Union of India AIR 1978 SC 597

"Right to life enshrined in Article 21 means something more than animal instinct and includes the right to live with human dignity, it would include all these aspects which would make life meaningful, complete and living."

¹⁷ National Human Rights Commission India (2018), <https://nhrc.nic.in/press-release/right-food-fundamental-right>.

¹⁸ FAO, Intergovernmental Working Group for the Elaboration of a Set of Voluntary Guidelines to Support the Progressive Realization of the Right to Adequate Food in the Context of National Food Security, Information Paper: Recognition of the Right to Food at the National Level. (2004), available at <ftp://ftp.fao.org/docrep/fao/meeting/007/j0574e.pdf>.

Role of Judiciary

Right to Food was first addressed in judicial proceedings in the matter of *Kishen Pattnayak & Another v. State of Orissa*.¹⁹ “In this appeal, the petitioner sent a letter to the Supreme Court highlighting the acute poverty of the Kalahandi community in Orissa, where hundreds of people were starving to death and many were forced to sell their children. The letter pleaded for the executive part of the democracy to be ordered to act right away to improve the terrible situation of the Kalahandi people. This was the first instance that explicitly addressed the problem of malnutrition and famine. The access to food was upheld by the Apex court of the country.”

*In People's Union for Civil Liberties v. Union of India*²⁰ the Judiciary asserted:

" Regarding this Court's directive from September 3, 2001, which required 16 states and union territories to identify the below minimum poverty line (BPL) under the Antyodaya Anna Yojana, according to the learned AG. We are not convinced that any such exercise has been carried out with the appropriate sincerity. The exercise is in progress, according to a few states. Given the gravity of the situation, these 16 states and union territories are given another chance to follow the Center's within three weeks and notify the central government of the number of BPL households they have identified under the Antyodaya Anna Yojana." In this case, it was argued that the state government is required by the Part IV of the Law of the land to prioritize the right to food and to put laws into place.

In *Impusial v. Union of India*²¹ the Judicial system expressed that the Executive organ of the democracy have fall short to disperse its duties efficaciously in proper distribution of food grains and preventing starvation. The court asserted that the food must reach the needful and decided that Article 21 under Part -III of the Law of the Land that ensure rights to life and dignity also fundamentally consists of right to good and it is expected of the government to distribute the grains to the needy. “The Supreme Court had also occasion to note unsatisfactory situation existing particularly regarding the implementation of the midday meal program in the states of Jharkhand, Uttar Pradesh, and Bihar. Examining the judge's decision reveals that it is interested in encouraging the administration to execute the lunchtime meal program in

¹⁹ Kishen Pattnayak & Another v. State of Orissa (1989) AIR 677

²⁰ People's Union for Civil Liberties v. Union of India 2001 (7) SCALE 484 SC

²¹ Impusial v. Union of India 2003(9) Scale 835

schools.”

In matter of “*Parmanand Katara v. Union of India*”²² the Court ruled that even private doctors could not refuse to treat a person who meets with an accident. The Court in the process of reasoning ruled thus: “The government is required to defend life under Article 21 of the Law of the Land "Doctors in government hospitals who are positioned to fulfill the state's responsibilities are therefore obligated to provide life-saving medical care. Whether working in a government hospital or not, doctors have a professional duty to provide life-saving care with the appropriate level of knowledge.”²³

Apex court of the country in “*Paschim Banga Khet Mazdoor Samati v. State of West Bengal*”²⁴ reiterated that " The governmental system is required by Article 21 to protect the lives of all. The state-run healthcare facilities have an obligation to provide medical services of the highest quality to save lives. A person's right to life as provided by Article 21 is violated when public medical facilities lack to treat them promptly. "

Perusal of the judgments above from the Supreme Court lead us to one conclusion that the Supreme Court has been trying to eradicate hunger, starvation and malnutrition by recognizing the fundamental right of food and adding context to the need for the right. The success of the precedents can be moderately observed from the “Global Hunger Index” and the reduced percentage of the starvation in India. The judgments are tall proof to nation’s concern for the millions that are still starving and go to sleep with empty stomachs and scrape for pennies in the bins in hope for something edible. Even in such cases, the legal system emphasizes the administration and government of their legal obligations to uphold the supremacy pertaining to law and the public.

Conclusion and Recommendations

In the nation of India, the basic entitlement to sustenance is fully realized when all individuals, including women, children, elderly people, and men, have access to enough food to survive.

Government at every situation has introduced many programs for the implementation of the

²² Parmanand Katara v. Union of India AIR 1989 SC 2039

²³ *Ibid.*

²⁴ Paschim Banga Khet Mazdoor Samati v. State of West Bengal AIR 1996 SC 2426.

right mentioned above but still there are certain shortcomings of these schemes which over the years are still there and not been corrected. Whenever any orders or directions are passed by the Apex Judicial Body of India relating to right to food, the government start implementing it immediately but after some time this will or fire in the heart of the government starts dousing and at the end, they shift their focus to something else as there is no system to monitor these programs and the directions of the Apex Judicial Body of India.

Thus, **Lack of will** is the major cause for non- implementation of this right by the government, and even if it is implemented there is **no system of monitoring** the same Because of this reason there is a possibility that the Ration Shops were not giving the food as per the quantity decided by the government or at the price agreed by the government.

Further, the families under the Below Poverty Line receives no information or notice from the government regarding their rights under the schemes implemented by them for them. Hence **lack of awareness** is another reason.

Another reason is **Uniform Policies and Schemes** will not be able bore the result which the government wants to achieve because food requirement of every state is not same, it differs on the basis of availability, accessibility because in some states there are more production of some grains so that state will have abundance of that grain in comparison with other states.

The primary root cause of these initiatives' collapse is bribery, which starts at lower stages and spreads throughout all stages of implementing proper adherence to bread.

Further, to maintain sustainability of right to food **employment** plays an important role because by way of reducing the poverty will improve the economic condition of the country, as a result it will increase productive employment especially in rural areas where drought and flood occur consistently and people belonging to vulnerable groups will be able to contribute for the progress of this country.

The **administration** in **PDS** is India is **crafty** filled with many corrupt individuals which makes it fragile and to add fire in it many forged cards are also being issued for this scheme the result of which is many people who are entitled for the scheme were left out of it.

Another point to be taken into consideration relating to **Distribution of Food under this scheme is unbalanced** because for the states where grains like wheat which grow in Punjab

needs to be distributed to Northeast States then the time and cost for transportation will be increased only. Geographical distribution is another factor under this.

The actions that the administration will undertake to carry out the scheme - To conquer the difficulties the government must implement and coordinate the implementation of programmes and monitor the allocations of resources. The following are the steps the government can take as suggested by the studies:

- The administration must guarantee the amount of inventory available of commodities and the supply of staple foods, grains, and lentils to meet the nutritional demands in order to offer sufficient dietary security. These products should be available to the people at cost effective rates under PDS in the post-harvest loss. There is a need for proper targeting of households for providing resources to only people below the poverty line and to plan the work employment program as per the vacancy and number of people to increase the purchasing power of the bread winners.
- The people have to learn the importance of nutrition to distribute food among the family members according to the need for nutrition. This can be done by effective monitoring and coordination among the community to ensure participation.
- The implementation of these policies can be determined by its seriousness for applying it, allocating resources and budget is not enough to make right to food programmes applicable, it should become the matter of court for its non-implementation.
- Lastly, giving reasonable and properly coordinated guidelines for entitlement to claim the nutrition services.

Recommendations promoting the betterment and application of proper adherence to nourishment include:

1. To have a balanced distribution of the Food it is necessary to build local food storages for the easier distribution and to expensive transport for the same.
2. Awareness Programmes in the native language will help the vulnerable families to understand their rights under these schemes as well as information relating to each scheme will protect these individuals from the malpractices of intermediaries.

3. Environment and cost-friendly technology should be used for better implementation of these programs.
4. Instead of income being used as determined factor of poverty, geographical conditions should be taken into consideration.
5. Attention should be given for empowering women who is a single parent or Widow.
6. Employment generation to improve accessibility of food.

References

1. Jean Ziegler, *What Is the Right to Food?* (2012) available at www.righttofood.org/work-of-jean-ziegler-at-the-un/what-is-the-right-to-food/.
2. Henry J. Steiner and Phillip Alston (Eds), *International Human rights in Context*, Oxford: Clarendon Press (1996), pp. 286
3. Sanjeev Gowda, *Right to Food in India: A Constitutional Perspective*, International Journal of Law and Legal Jurisprudence Studies Vol 3 Issue 2 available at <http://ijlljs.in/wp-content/uploads/2016/04/3.pdf>
4. FIAN India, *Parallel Report The Right To Adequate Food in India*, ICESR 40th session (2002) http://www.fian.org/fileadmin/media/publications_2015/The-Right-to-Adequate-Food-in-India-2008.pdf
5. Dev, Mahendra. (2003). *Right to food in India*.
6. 2020 Global Hunger Index by severity
7. *Francis Coralie v. Union Territory of Delhi* 1981 AIR 746:1981 SCR (2) 516:1981 SCC (1) 608
8. *Maneka Gandhi v. Union of India* AIR 1978 SC 597
9. National Human Rights Commission India (2018)

Available at <https://nhrc.nic.in/press-release/right-food-fundamental-right>
10. FAO, Intergovernmental Working Group for the Elaboration of a Set of Voluntary Guidelines to Support the Progressive Realization of the Right to Adequate Food in the Context of National Food Security, Information Paper: Recognition of the Right to Food at the National Level. (2004), available at <ftp://ftp.fao.org/docrep/fao/meeting/007/j0574e.pdf>.
11. *Kishen Pattnayak & Another v. State of Orissa*. (1989) AIR 677
12. *People's Union for Civil Liberties v. Union of India* 2001 (7) SCALE 484 SC

13. *Impusial v. Union of India* 2003(9) Scale 835

14. *Parmanand Katara v. Union of India*, AIR 1989 SC 2039

15. *Paschim Banga Khet Mazdoor Samati v. State of West Bengal* AIR 1996 SC 2426.