The Missing Middle: Women's Collectives between Welfare Delivery and Accountability in India

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Abstract

Governments have invested heavily in organizing women into collectives, often with the expectation that this will strengthen accountability for public services. Yet organization does not necessarily translate into political authority. This article examines how the institutional roles assigned to women's collectives shape their capacity to hold the state accountable, using India's National Food Security Act (NFSA) as a case study. An analysis of 1,719 Indian court decisions reveals two largely separate tracks of litigation: women's collectives appear predominantly as welfare providers or delivery agents, defending contracts and licenses, while entitlement holders pursue claims through separate accountability institutions. Survey and organizational evidence shows that collectives do identify failures and aggregate grievances, but often pursue them outside formal grievance procedures. These findings illustrate a political economy of selective incorporation: states may recognize women's organizations as service providers and monitors without establishing equivalent obligations to respond to their claims. Incorporation can also create economic interests that conflict with those of entitlement holders. The article distinguishes administrative incorporation, state-authorized oversight, and obligation-based responsiveness, arguing that collective accountability requires not merely opportunities to participate, but enforceable procedures for responding to claims, documenting corrective action, and contesting inadequate compliance.

Keywords: food security, women's collectives, grievance redress, social accountability, litigation, large language models, India

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1 Introduction

Over the past three decades, governments and international development organizations have invested heavily in organizing poor citizens into community collectives.[1] Women's self-help groups, village organizations, and federations have become central institutions of development policy, particularly in rural India. Research suggests that these organizations can strengthen women's agency, social networks, and participation in community affairs (Agarwal 2026; Majumdar, Rao, and Sanyal 2026; Kabeer 2024; Brody et al. 2017; Desai and Joshi 2014). These investments also rest on a broader promise: organized citizens, particularly women, should be better able to hold governments accountable for the delivery of public services. However, evidence from community-driven development and social accountability programs suggests that participation rarely produces lasting institutional change (Mansuri and Rao 2012; Casey 2018).

Why does the expansion of collective organization not translate into greater accountability? Part of the answer lies in the institutional roles that states assign to collectives. Although collective organization can strengthen women's voice and agency, effective accountability also requires institutional "teeth": the capacity and willingness of public authorities to respond to collective demands and enforce corrective action (Fox 2015). Governments may engage collectives as service providers, authorize them to monitor implementation, or establish procedures that require officials to respond to their claims (Joshi and Rao 2018). These choices create distinct relationships between collectives and the state: service delivery, authorized oversight, and enforceable responsiveness. The first two can expand women's responsibilities without a corresponding redistribution of authority. This limits the capacity of collectives to hold the state accountable (Batliwala and Dhanraj 2007; Bhanjdeo et al. 2025).

India's right to food provides a revealing setting in which to examine these distinctions. Since 2001, judicial decisions and legislation in India have transformed food assistance into legally defined entitlements, culminating in the 2013 National Food Security Act (NFSA) (Drèze and Khera 2017). During roughly the same period, the National Rural Livelihoods Mission (NRLM) organized more than 100 million rural households into women's self-help groups and their federations (Government of India 2025). The NFSA recognizes self-help groups as potential managers of ration shops and establishes grievance officers, State Food Commissions, social audits, and vigilance committees to oversee implementation (Government of India 2013). However, the two institutional architectures intersect only weakly. The Act specifies household entitlements and mechanisms for challenging violations, but does not define how authorities must respond when women's collectives document recurring failures and seek corrective action for affected households.

To examine the relationship between women's collectives and the state, this article analyzes 1,719 Indian court decisions concerning the NFSA, its institutions, and related schemes, retrieved through

[1] The World Bank's community and local development portfolio in FY2025 was valued at USD 48.7 billion in 341 operations in 95 countries (Rubinyi 2025); see also Wong and Guggenheim 2018.

seventeen searches of Indian Kanoon and systematically coded using large language models. The analysis reveals two largely separate tracks of litigation. Most disputes concern who delivers food rather than whether households receive it. Women's collectives appear in 207 (12.04 percent) decisions, predominantly as suppliers defending contracts or licenses. In only two decisions do women's collectives advocate for entitlement holders beyond their own members. In neither case do they appear to have pursued their claims through the grievance redressal mechanisms established under the NFSA before ending up in court.

The separation is striking because the Act's accountability provisions are themselves the subject of litigation in Indian courts. Grievance officers, State Food Commissions, social audits, and vigilance committees feature in 80 decisions, half of which advance the interests of entitlement holders. Yet only five decisions involve both women's collectives and these formal accountability institutions. In four, the collectives appear as participants in food delivery rather than as actors seeking redress. For example, in a Jharkhand case, a self-help group operating a ration shop was among the dealers accused of withholding food from eligible households. This illustrates a tension in accounts of women's collective empowerment: organizations incorporated into welfare delivery may develop economic interests that conflict with those of the women they might otherwise represent. State recognition can strengthen collectives as service providers without necessarily strengthening their independence as advocates for beneficiaries (Banks, Hulme, and Edwards 2015).

The absence of collectives from accountability litigation does not establish that they play no role in these efforts. A survey of 1,308 women affiliated with the Self-Employed Women's Association (SEWA), records from SEWA Bharat, PRADAN, and Seva Mandir, and orders from the Jharkhand State Food Commission highlight their work. These sources suggest that collectives identify recurring failures, assist excluded households, and aggregate grievances, but typically direct their evidence to local elected representatives and frontline officials rather than through the Act's formal grievance procedures. Together, these findings reveal a gap between collectives' capacity to document entitlement failures and the state's responsibility to ensure corrective action.

This article contributes to the political economy of collective agency and accountability. It builds on feminist scholarship that distinguishes women's participation from the transformation of power relations (Rowlands 1997; Kabeer 1999; Cornwall 2003; Batliwala and Dhanraj 2007; Kabeer 2011; Kabeer 2024; Agarwal 2026) and research on the institutional foundations of enforceable rights (Epp 2010; Fox 2015; Adhikari and Heller 2024). The article distinguishes three relationships between collectives and the state: administrative incorporation, state-authorized oversight, and obligation-based responsiveness. The first two enable collectives to deliver or monitor public services without necessarily requiring officials to act on their claims. The third entails enforceable obligations to investigate collective grievances, issue decisions, and document corrective action.

The second contribution is methodological. Building on applications of artificial intelligence to Indian judicial records (Behrer et al. 2025; Bhupatiraju, Chen, and Joshi 2026), the article uses

large language models to classify litigation by the interests asserted, organizational roles, and judicial remedies, with independent coding and adjudication to assess reliability (Gilardi, Alizadeh, and Kubli 2023; Ziems et al. 2024).[2] Although court records cannot capture collective action outside litigation or establish whether remedies are implemented, they reveal which organizations and claims become visible in formal legal disputes.

Section 2 reconstructs the legal architecture of India's right to food, and Section 3 examines the conditions that shaped it. Section 4 describes the court records and other evidence. Section 5 presents the litigation, and Section 6 examines the evidence from collectives. Section 7 considers what collective accountability would require.

2 The Legal Architecture of Food Security

2.1 The PUCL Case

In 2001, the People's Union for Civil Liberties (PUCL) petitioned the Supreme Court to recognize the right to food under Article 21 of the Constitution and enforce existing food schemes (Supreme Court of India 2001). The Court's landmark order of 28 November 2001 transformed eight existing welfare schemes into judicially enforceable entitlements, including food grain allocations, nutritional provisions for children and pregnant and lactating women, and cooked mid-day meals in government schools (Drèze 2004; Drèze and Goyal 2003). Rather than resolving the case through a single judgment, the Court exercised continuing mandamus, issuing successive interim orders that progressively defined entitlements, established monitoring mechanisms, and imposed obligations on state officials (Birchfield and Corsi 2010).

The Court also established an accountability framework. Its order of 8 May 2002 assigned responsibilities to District Collectors and Chief Secretaries for addressing complaints and ensuring compliance, while appointing Supreme Court Commissioners to examine unresolved grievances and enlist individuals and reliable organizations to assist in monitoring.[3] The Court's orders also recognized collective oversight through Gram Sabhas, constitutionally recognized village assemblies empowered to conduct social audits, obtain information on food and employment schemes, and report violations for official investigation. Collective oversight thus had a place in the judicial framework, but its formal recognition centered on village assemblies rather than autonomous women's collectives such as self-help groups and their federations.

Public interest litigation provided another route for collective claims. By relaxing traditional rules

[2]Previous research on Indian environmental rulings found that language models systematically classified more decisions as favorable than human coders, partly because they emphasized formal judicial outcomes rather than implementation prospects (Behrer et al. 2025).

[3]Supreme Court order dated 8 May 2002, available at `https://web.archive.org/web/20150722012905/http://www.righttofoodindia.org/orders/may8.html`.

of standing, the Court allowed individuals and organizations to petition on behalf of disadvantaged groups (Birchfield and Corsi 2010; Bhuwania 2017).[4] Access to constitutional litigation, however, was distinct from access to routine administrative grievance procedures. Although organizations such as PUCL could challenge systemic failures before the Supreme Court, this did not establish a clear administrative pathway through which local women's collectives could submit aggregated complaints and secure corrective action. The PUCL litigation thus produced a differentiated accountability framework: individual beneficiaries could seek redress, Gram Sabhas could conduct social audits, and civil society organizations could monitor implementation and pursue litigation. Women's collectives were not formally excluded from these activities, but their specific authority within this framework remained unclear.

2.2 The National Food Security Act

The National Food Security Act (NFSA), enacted in September 2013 and deemed effective from 5 July 2013, codified many of these entitlements. It guaranteed 35 kg of food grains per month to Antyodaya Anna Yojana households and 5 kg per person to priority households, with coverage of up to 75 percent of the rural and 50 percent of the urban population, initially at subsidized prices.[5] The Act also established nutritional entitlements for children through the Integrated Child Development Services (ICDS) and mid-day meals, and provided pregnant and lactating women with free nutritional support through anganwadis and maternity benefits of at least Rs. 6,000, subject to statutory exceptions (Government of India 2013).[6] Section 13 designated the eldest woman aged 18 or above as head of household for ration-card purposes, while state governments were responsible for identifying beneficiaries, distributing food grains through fair price shops, and establishing grievance redressal mechanisms.

The Act established a statutory grievance redressal framework (Government of India 2013).[7] Section 14 required states to establish internal grievance mechanisms, while Section 15 provided for a District Grievance Redressal Officer in each district to address complaints concerning the distribution of entitled food grains or meals and enforce entitlements. Section 16 established State Food Commissions to monitor implementation, investigate violations, and hear appeals against grievance officers' orders. Section 33 authorized penalties against public servants or authorities

[4] Public interest litigation emerged in India in the late 1970s and early 1980s, as the Supreme Court relaxed traditional standing requirements to allow individuals and organizations to bring claims on behalf of disadvantaged groups unable to approach the courts themselves (Bhuwania 2017).

[5] Sections 3 and 9 and Schedule I of the NFSA (Government of India 2013). Since January 2023, eligible households have received these grains free of charge (Government of India 2022).

[6] Sections 4–6 and Schedule II of the NFSA. Section 8 provides for a food security allowance when entitled grains or meals are not supplied (Government of India 2013).

[7] The establishment of these institutions required subsequent judicial intervention. In *Swaraj Abhiyan v. Union of India*, the Supreme Court reviewed states' compliance with the NFSA's grievance redressal provisions. In July 2017, it observed that, nearly four years after the Act's enactment, several states had still failed to make the mandated institutions functional (Supreme Court of India 2017).

who, without reasonable cause, failed to comply with relief recommended by a grievance officer. The Act does not expressly restrict complaints to individuals, and its appeal provision refers to "any complainant." Yet it does not specify whether, or under what conditions, women's collectives may submit aggregated complaints, represent households beyond their membership, or appeal decisions on behalf of entitlement holders (Government of India 2013).

The Act recognized collective organizations more explicitly in service delivery and oversight. Section 12(2)(e) envisaged preferential treatment for public institutions and bodies, including Panchayats, self-help groups, and cooperatives, in the management of fair price shops. Sections 28 and 29 provided for social audits and vigilance committees, respectively. Local authorities or other state-authorized bodies could conduct social audits, while vigilance committees at the state, district, block, and fair price shop levels were responsible for monitoring implementation and reporting violations to grievance officers. These provisions created opportunities for administrative incorporation and state-authorized oversight without necessarily granting collectives corresponding rights to demand adjudication or ensure corrective action.

State rules illustrate considerable variation in the recognition of collective complaints. Bihar's 2017 rules permit any person or institution to complain to nodal officers under Section 14, but frame complaints before District Grievance Redressal Officers under Section 15 around aggrieved persons (Government of Bihar 2017). West Bengal's rules similarly refer to aggrieved persons as complainants, while requiring grievance officers to act on written information from vigilance committees (Government of West Bengal 2016). Kerala's Food Security Rules, 2018 go further. Rule 27 expressly permits complaints by groups of persons or through organizations acting on their behalf, requires written acknowledgment and decisions within prescribed periods, and provides for action-taken reports when complaints are referred to other authorities. It also authorizes grievance officers to recommend systemic reforms (Government of Kerala 2018). These differences demonstrate that collective representation can be formally recognized within the NFSA's existing framework. Whether such procedures enable collectives to challenge inadequate responses and verify that corrective action reaches affected households, however, remains an open question.

Participation in welfare delivery and oversight does not necessarily translate into enforceable accountability rights. A self-help group may manage a ration shop, participate in a vigilance committee, or document recurring failures without having a clear procedural means to challenge official responses. Grievance officers already have the duty to hear complaints and provide relief, and some state rules establish reporting and appeal procedures. But the framework does not uniformly guarantee that collective grievances receive reasoned decisions, that the organizations that bring them can contest inadequate responses, or that corrective action is independently verified. The institutional gap is therefore not simply one of access or standing, but whether collective claims generate enforceable obligations extending through implementation and review.

Digitization has introduced additional obstacles to redress. Biometric authentication and digitized

beneficiary records have strengthened some forms of monitoring but also excluded households whose authentication failed or whose records were not linked (Drèze, Khalid, et al. 2017; Carswell and De Neve 2022; Panda and Dash 2025). Online grievance procedures can reproduce these barriers. The national NFSA grievance portal requires an Aadhaar number authenticated through a linked mobile phone, along with ration card and fair price shop details.[8] Thus, the credentials whose absence can prevent households from receiving food may also be required to report their exclusion. Women's collectives could help affected households navigate these barriers, provided that grievance procedures recognize their claims and require authorities to respond.

The government described the NFSA as "a paradigm shift in the approach to food security from welfare-based to rights based approach" (Department of Food and Public Distribution, Government of India 2026). For individual beneficiaries, whose entitlements the Act specified in detail, this represented a substantial legal shift (Government of India 2013). For women's collectives, however, the implications were less clearly defined. The Act recognized their potential role in delivery and oversight but left collective grievance representation dependent on state-level procedures and their implementation (Government of India 2013; Government of Bihar 2017; Government of West Bengal 2016; Government of Kerala 2018).

3 Why the Architecture Looks This Way

Three overlapping factors may help explain why India's food-security framework incorporated women's collectives into delivery and monitoring without establishing equally clear obligations to respond to their claims. The first concerns how rights-based welfare defines claims and claimants. Around the turn of the century, the global expansion of human rights discourse encouraged states to adopt rights-based policies (Rajagopal 2003; Moyn 2010). In India, public interest litigation had already opened a channel for organizations to represent disadvantaged groups, although pursuing such claims required substantial resources and legal expertise (Bhuwania 2017). These developments unfolded against a history of postcolonial governance that separated rights-bearing citizens from populations governed through localized structures of authority (Mamdani 1996). These divisions continue to shape access to formal institutions; disadvantaged populations often rely on political intermediaries, patronage networks, and civil society organizations to negotiate claims on the state, rather than formal rights-based channels (Chatterjee 2004; Auerbach and Thachil 2018; Adhikari and Heller 2024).

The second factor is the political economy of selective incorporation. States may have stronger incentives to engage women's collectives in implementing welfare programs than to recognize them

[8]The Department of Food and Public Distribution's national online grievance form requires Aadhaar-based OTP verification, a ration card number, and fair price shop information. Its terms also state that submissions do not constitute formal complaints. See `https://nfsa.gov.in/public/frmRegisterPublicGrievance.aspx`, accessed 17 November 2026.

as independent accountability claimants. As service providers, collectives contribute local knowledge, administrative capacity, and organizational infrastructure. As accountability claimants, they may challenge official decisions, expose implementation failures, and demand corrective action. Feminist scholarship has shown how development programs can instrumentalize women's participation, expanding their responsibilities without a corresponding redistribution of authority or resources (Kabeer 1999; Jakimow and Kilby 2006; Batliwala and Dhanraj 2007; Li 2007; Rai, Hoskyns, and Thomas 2014; Devika 2016). The institutional design of state-supported collectives also shapes whose participation is encouraged and what influence they can exercise (Joshi and Rao 2018). Incorporation can further reshape collectives' interests: contracts and licenses may strengthen their economic position while creating incentives that conflict with independent advocacy for entitlement holders (Banks, Hulme, and Edwards 2015; Fox 2020). This perspective suggests why administrative incorporation and accountability authority may develop unevenly, without requiring that their separation reflect a deliberate strategy of exclusion.

The third factor is the institutional history. India's food-rights movement and its national infrastructure of women's self-help groups developed through largely separate processes. The Supreme Court's right-to-food orders enlisted NGOs in monitoring and recognized Gram Sabhas as social audit bodies, while the National Rural Livelihoods Mission organized self-help groups and federations through a separate administrative structure. The legislative record reflects this separation. The Standing Committee's account of consultations on the Food Security Bill records discussions with State Food Secretaries, an Empowered Group of Ministers, the National Advisory Council, the Rangarajan Committee, and numerous ministries and departments, but does not identify consultations with self-help groups or women's federations (Lok Sabha Standing Committee 2013).[9] Stronger accountability provisions were also removed from early drafts of the legislation (Drèze 2019). The resulting Act recognized self-help groups primarily as potential participants in food distribution, while establishing a separate structure for grievance redress.

This separation was not institutionally inevitable. Under the Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA), Andhra Pradesh developed a system of social audits in which village resource persons, including women drawn from self-help groups, verified implementation and presented findings at public hearings. A state-supported but organizationally separate audit structure gave collective oversight a degree of independence from the officials whose work was examined (Afridi and Iversen 2014; Veeraraghavan 2021; Adhikari and Heller 2024).[10] The comparison shows that collective monitoring can be connected to formal institutions while retaining some independence from service providers. It does not establish that such arrangements

[9]The Standing Committee's report summarizes the legislative consultations rather than providing a complete record of the National Advisory Council's deliberations. The absence of recorded consultations with women's collectives does not establish that none occurred.

[10]Section 17 of MGNREGA made social audits a statutory responsibility of Gram Sabhas. The arrangements discussed here operated under MGNREGA, which was repealed with effect from 1 July 2026 and replaced by the Viksit Bharat–Guarantee for Rozgar and Ajeevika Mission (Gramin) Act, 2025 (Government of India 2026).

necessarily produce effective remedies.

Variation within the NFSA further qualifies any explanation based solely on statutory exclusion. As Section 2 shows, Kerala's rules explicitly recognize group and representative complaints, while other states define more limited or less explicit routes for collective participation. The national framework therefore leaves room for different institutional arrangements. Whether these translate into effective accountability depends not only on formal recognition, but also on the capacity of collectives to pursue claims, the independence of grievance institutions, and the obligations imposed on officials to demonstrate compliance.

Taken together, these factors help explain why extensive investment in collective organization can coexist with limited institutional authority over welfare accountability. Rights-based governance defines individual entitlements, selective incorporation gives collectives roles in implementation, and separate institutional development leaves their relationship to grievance institutions uneven. These arrangements also suggest a pattern in the legal record: collectives should be more visible as providers defending contracts and licenses than as independent representatives of entitlement holders. The following sections examine whether this pattern appears in NFSA litigation and what evidence outside the courts reveals about collective grievance activity.

4 Data and Methods

The article draws on four bodies of evidence: court decisions concerning the NFSA, a survey of women affiliated with SEWA Bharat, documentary records from three organizations that build women's collectives and orders of the Jharkhand State Food Commission. The court decisions are the principal source since these records are produced by the state rather than by collectives themselves. Moreover, they can be read and analyzed in full.

4.1 Court Records

Decisions were retrieved from Indian Kanoon, a free online database of judgments and orders of the Supreme Court and the High Courts (Indian Kanoon 2026), in two retrievals. The first collected every decision returned for the query "NFSA", the abbreviation by which courts usually refer to the Act, and yielded 558 analyzable decisions.

The second retrieval was designed to find what the abbreviation misses. Thirteen further queries searched for the Act's full name; for its accountability institutions, including State Food Commissions, District Grievance Redressal Officers, vigilance committees, social audits and the Supreme Court's *Swaraj Abhiyan* litigation; for its entitlements, including ration cards, the food security allowance, maternity benefits, the Integrated Child Development Services (ICDS) and mid-day meals; and for supply arrangements involving self-help groups and women's organizations. Each query was limited to decisions after 5 July 2013, when the Act came into force, and one was also

run in three date ranges to stay within the database's limit of 1,000 results per search. The queries for collectives did not require the Act to be named, so that supply disputes involving collectives would be found whether or not the decision cited it. The sixteen searches returned 1,842 documents. After the removal of duplicates and of the 238 documents already in the first retrieval, the second retrieval added 1,161 decisions.[11]

All 1,719 decisions were coded (Table 1). The second retrieval was coded in two rounds. The first round covered 421 decisions: those matching a screen for collectives or for the accountability institutions, those flagged by a broader vocabulary or by an independent search, and a random sample of the remainder. The second round covered the remaining 740. The corpus includes 294 orders of the Calcutta High Court concerning vacancies for ration-shop dealers in West Bengal. Of these, 207 follow a common template and were coded under a single rule; the other 87 were read individually. Because these orders are numerous and nearly identical, shares are reported both for the full corpus and without them.

Table 1: Court Decisions Retrieved and Coded

	First retrieval	Second retrieval	All
Distinct decisions	562	1,161	1,723
Analyzable and coded	558	1,161	1,719
coded in the first round		421	
coded in the second round		740	
of which West Bengal ration-shop orders		294	

Notes: Decisions retrieved from Indian Kanoon. The first retrieval returns every decision for the query "NFSA"; the second runs 16 further searches from 13 queries, restricted to decisions after 5 July 2013, and excludes decisions already retrieved. In the first round, the second retrieval was screened for women's collectives and the Act's accountability institutions, and the matches, decisions flagged by other searches and a random sample of the remainder were coded; the second round coded the rest. Four first-retrieval decisions are unreadable.

Source: Author's coding of Indian Kanoon decisions.

4.2 Coding

Each decision was coded for whether a women's collective appears and in what role; whether the Act's accountability institutions (Sections 14, 15, 16, 28 and 29) appear and how; what the claim concerns; whose interest it asserts; and who benefits from the remedy. Women's collectives include self-help groups, mahila mandals, women's cooperatives, federations and groups of women petitioning together on a shared claim. Self-help groups are counted whether or not the decision

[11] Because the second retrieval deliberately included searches for supply arrangements involving women's collectives, the distribution of roles in the full corpus should not be interpreted as representative of all NFSA litigation. The searches were designed to identify decisions across delivery and accountability functions rather than to estimate their population frequencies.

states their members' sex. The coding of roles distinguishes collectives that supply food under a contract or license, collectives accused of supply failures, collectives claiming their own members' entitlements, collectives acting for other entitlement holders and collectives named only in a statute, rule or scheme. The accountability institutions are coded as engaged when a party litigates them or the court directs their use, and as mentioned when they appear without being acted upon.

Two rules required the author's judgment. A collective named only in the quoted text of Section 12(2)(e), which lists self-help groups among the bodies to be preferred as managers of ration shops, is not counted as present. A decision that disposes of a petition with liberty to approach the District Grievance Redressal Officer is counted as engaging these institutions. The results do not depend on either rule. Counting quotations of Section 12(2)(e) raises the number of decisions with a collective from 207 to 217, all of them in the category of collectives named only in a statute or rule. Treating relegation orders as mentions reduces the number of decisions engaging these institutions from 80 to 64.

The first coding was carried out with Claude, a large language model developed by Anthropic, working from a written codebook.[12] I wrote the codebook, set the rules above and decided every disputed code. Large language models have been shown to classify political texts more accurately than crowd workers (Gilardi, Alizadeh, and Kubli 2023), but their agreement with human coders varies considerably across tasks (Ziems et al. 2024). Their codes therefore require independent checks, and three kinds were applied.

First, a second model, ChatGPT (OpenAI), searched the full text of all 1,161 decisions in the second retrieval for collectives and for the accountability institutions, without access to the first coding. Agreement was substantial for the presence of a collective ($\kappa = 0.67$) and high for the accountability institutions ($\kappa = 0.94$). ChatGPT found 95.9 percent of the decisions in which a collective had been coded, and the four decisions with collectives that only it identified were added.

Second, ChatGPT coded samples blind. From the first round it coded 161 decisions: every decision in which a collective appears in a role other than provider, every decision engaging the accountability institutions and a random sample of 60. Before adjudication, κ was 0.94 for the presence of a collective, 0.79 for its role and 0.67 for the tier of institutional use; in the random sample the figures were 0.90 for the presence of a collective and 0.77 for the accountability institutions. Both coders classified the same two decisions as representative, and no others. I reviewed each disagreement against the text of the decision, and ten reflected errors or inconsistencies in the first coding and were corrected. From the second round ChatGPT coded a random sample of 100 decisions,

[12]The model recorded each code with a verbatim excerpt from the decision supporting it. Decisions in the second retrieval were coded from structured extracts (parties, prayers, operative directions and passages containing search terms), with the full text consulted where the extract was insufficient. The codebook, coded data and scripts are included in the replication package. Model versions, session records and transcripts are available from the author on request.

with κ of 0.89 for the subject of the claim and 0.80 for the disposition; fifteen errors in the first coding were corrected, fourteen of them dispositions. An earlier check of 112 decisions from the first retrieval produced κ between 0.82 and 0.91.

Third, a third model, Gemini (Google), read ten decisions blind under neutral identifiers to test the rule on Section 12(2)(e). It read every decision quoting the clause as naming collectives only in statutory text, which supports the rule, but would have counted such mentions as present. The more inclusive count is therefore reported alongside the main one.

These counts should be read with three limitations in mind. First, they describe decisions indexed by Indian Kanoon and are lower bounds for that database. Its coverage of High Court orders is incomplete and may have changed over time, so year-to-year changes may partly reflect indexing. Second, decisions are counted individually; several may belong to one proceeding, and the number of proceedings is reported where it matters. Third, and most important, courts see only disputes that become cases. The absence of collectives from a particular role in court does not show that collectives do no such work elsewhere; Section 6 takes up that question directly.

4.3 Other Evidence

The second source is a telephone survey of 1,308 SEWA-affiliated women entrepreneurs and program participants in ten states, conducted by trained female enumerators in February and March 2022 as part of an evaluation of SEWA Bharat's Udyami program (Joshi, Hazra, et al. 2023). I was a member of the team that designed and analyzed the survey, and the figures reported here are my calculations from its microdata. Respondents were asked about their use of food entitlements and who had helped them obtain them. Because all respondents were affiliated with SEWA Bharat, the results describe these women rather than rural women in general.

The third source is documentary: annual reports, program documents and internal publications from 2018 to 2025 of PRADAN, SEWA Bharat and Seva Mandir, three organizations with different forms of collective organization.[13]

Finally, the Jharkhand State Food Commission publishes a register of disposed cases on its website.[14] For 2024 the register lists 17 cases, and orders for 16 of these were available. It lists 67 disposed cases for 2022 and 64 for 2023, but the orders for those years are no longer accessible. Whether the 2024 cases are representative of the Commission's caseload cannot be established, and they are used for illustration only.

[13] Because the organizations have an interest in presenting their work favorably, their records are used to illustrate how intermediation works, not to measure its extent or effect.

[14] Jharkhand State Food Commission, "Disposed Cases" (Jharkhand State Food Commission 2026).

5 Evidence from Litigation

5.1 A Contest over Delivery

Most of the litigation in the court record concerns who delivers food rather than whether entitled households receive it. In the first retrieval, 58.4 percent of decisions concern delivery arrangements: ration-shop licenses, tenders and contracts for supplementary nutrition and appointments to dealer vacancies (Table 2). Another 13.1 percent concern entitlements, many through public interest petitions. The remainder largely involve employment disputes and criminal proceedings over diversion or fraud. In 83.7 percent of the decisions, petitioners assert their own interests, usually as dealers or contractors; 13.6 percent assert entitlement holders' interests. The full corpus of 1,719 decisions shows the same pattern: 57.6 percent concern delivery arrangements and 81.4 percent assert petitioners' own interests.[15]

Table 2: What NFSA Litigation Is About

	First retrieval ("NFSA")		All decisions		Excluding West Bengal orders	
	N	%	*N*	%	*N*	%
Panel A. What the claim concerns						
Delivery arrangement	326	58.4	990	57.6	697	48.9
Entitlement	73	13.1	234	13.6	234	16.4
Employment	70	12.5	145	8.4	144	10.1
Enforcement	66	11.8	223	13.0	223	15.6
Accountability institutions	–	–	14	0.8	14	1.0
Other or unclear	23	4.1	113	6.6	113	7.9
Panel B. Whose interest the claim asserts						
The petitioner's own	467	83.7	1,399	81.4	1,105	77.5
Entitlement holders'	76	13.6	226	13.1	226	15.9
Other or mixed	15	2.7	94	5.5	94	6.6
Decisions	558		1,719		1,425	

Notes: Delivery arrangements are licenses, tenders, contracts and dealer vacancies; entitlements are inclusion, quantities, ration cards and allowances; employment concerns staff of supply and nutrition programs; enforcement is the prosecution of diversion and fraud. Accountability institutions are disputes about grievance officers, State Food Commissions, social audits or vigilance committees themselves; this category was used only for second-retrieval decisions coded in the first round. The first retrieval comprises all analyzable decisions returned by Indian Kanoon for the query "NFSA". The last two columns exclude 294 near-identical Calcutta High Court orders in which ration-shop dealers challenge notifications of new dealerships. Percentages may not sum to 100 because of rounding.

Source: Author's coding of Indian Kanoon decisions.

Delivery disputes are also the largest category in every year since 2017, when the recorded volume of litigation begins to grow (Figure 1). Entitlement and enforcement claims rose in 2020, during

[15] Excluding the 294 near-identical West Bengal dealers' orders, delivery disputes fall to 48.9 percent but remain the largest category, while the share asserting entitlement holders' interests rises to 15.9 percent.

the Covid-19 lockdown, before declining. These trends should however be read cautiously since Indian Kanoon's coverage may vary over time.

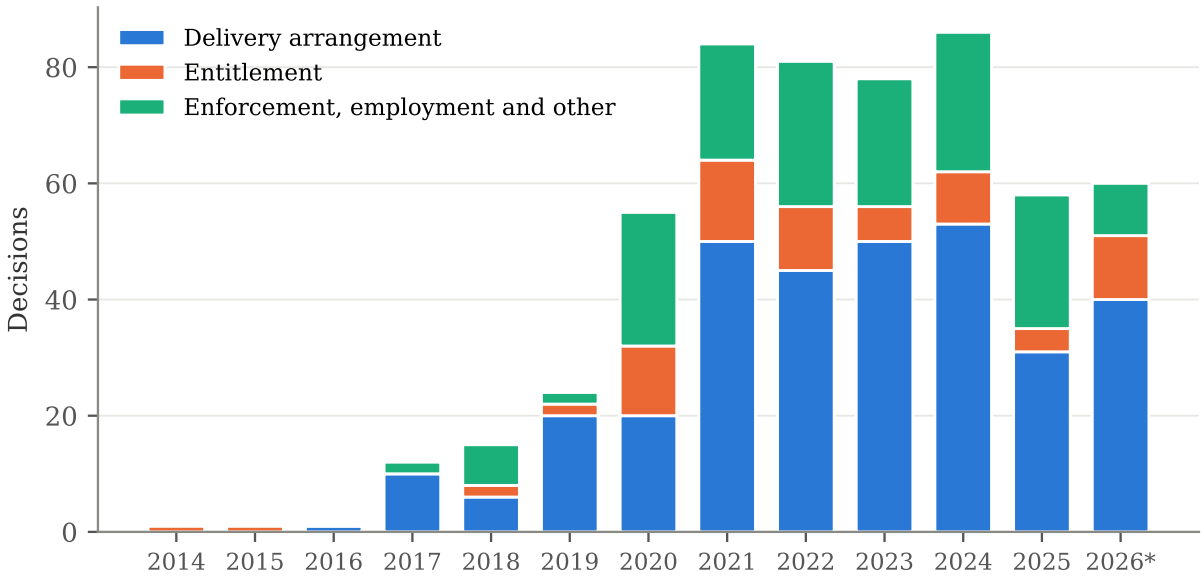

Figure 1: NFSA Decisions by Year and Type of Claim

Notes: All analyzable decisions returned by Indian Kanoon for the query "NFSA", excluding two with implausible dates. *2026 to mid-November. Changes over time may partly reflect changes in the database's coverage.
Source: Author's coding of Indian Kanoon decisions.

5.2 Collectives in Court

Women's collectives appear in 207 decisions from 190 proceedings. In 154 decisions they are providers defending contracts or licenses (Table 3). Most are self-help groups and mahila mandals supplying take-home rations and supplementary nutrition under ICDS, chiefly before the High Courts of Orissa, Karnataka, Bombay and Madhya Pradesh. Others operate ration shops, including women's cooperatives in Assam challenging the closure of small shops. Courts generally adjudicate these organizations' contractual and administrative interests, much as they do those of other suppliers. Among provider decisions, the remedy benefits the provider in 53 cases, the state in 42 and neither party in 49.[16]

Only two decisions involve a collective acting for entitlement holders beyond its own members, and neither produces a remedy through the NFSA's grievance procedures. In 2023 the Delhi High Court disposed of a public interest petition by Mahila Ekta Manch, a women's organization, seeking hot cooked meals or a food security allowance for schoolchildren during the pandemic, without issuing

[16]In the remaining 10 it benefits accused persons, rival suppliers, employees or, in one case, entitlement holders. In another 40 decisions collectives appear only in a statute, rule, scheme or state plan, and three concern collectives accused of supply failures.

Table 3: How Women's Collectives Appear in NFSA Litigation

	First retrieval	Second retrieval	All	Act named
Provider (contract, tender or license holder)	16	138	154	49
Named only in a statute, rule or scheme	7	33	40	25
Women claiming their own entitlement	6	0	6	6
Provider accused of supply failures	1	2	3	3
Representative of other entitlement holders	0	2	2	1
Court-designated helper, not a party	1	0	1	1
Other	0	1	1	1
Total	31	176	207	86
By scheme (all decisions)				
ICDS and take-home rations			139	
Public Distribution System			46	
Mid-day meals			14	
Other, several or none			8	

Notes: The 207 coded decisions in which a women's collective appears. Collectives include self-help groups, mahila mandals, women's cooperatives and federations, and women petitioning together on a shared claim. "Act named" counts decisions whose text names the National Food Security Act. A collective named only in the quoted text of Section 12(2)(e) is not counted; counting such quotations adds ten decisions, all in the second row.

Source: Author's coding of Indian Kanoon decisions.

substantive directions.[17] In Arunachal Pradesh, a village self-help group alleged that a ration dealer had diverted rice intended for eleven Antyodaya households. The allegation led to a prosecution for cheating and forgery, which the Gauhati High Court quashed in 2026 after the informant and the accused settled. The group itself was not a party.[18] Neither matter passed through a grievance officer, Food Commission or vigilance committee.

Across all 1,719 decisions, no collective brings, joins or represents a claim on behalf of other entitlement holders through the Act's accountability institutions. The predominance of provider disputes partly reflects the retrieval strategy, which explicitly searched for supply arrangements involving women's collectives. Yet the absence of representative claims through the Act's accountability institutions remains striking, particularly because the searches also targeted grievance and oversight bodies. This pattern does not establish that collectives rarely pursue such claims outside litigation. Rather, it shows that the legal relationships through which collectives become visible in the retrieved judicial record are predominantly those of welfare provision. Contracts and licenses generate economic and procedural interests that courts can adjudicate, while collectives' potential role as representatives of entitlement holders is almost entirely absent.

5.3 Collectives as Delivery Agents

Incorporation into welfare delivery shapes the legal interests through which women's collectives appear before the courts. In the decisions reviewed here, courts adjudicate their claims primarily as holders of licenses and contracts, rather than as representatives of entitlement holders. In 35 of the 157 decisions in which a collective supplies food, the dispute begins not with a change of policy but with an allegation about the collective's own conduct: an inspection, a failed food sample, a show-cause notice, or a complaint by cardholders. Courts rarely resolve the substance of these allegations, instead upholding administrative action, setting it aside for a hearing, or returning the dispute to officials.

Judicial doctrine also defines the limits of collectives' claims. Dismissing more than two hundred petitions by self-help groups against the centralization of take-home rations, the Chhattisgarh High Court held that the Supreme Court's orders in PUCL had created no enforceable right in their favor, being "only a direction or suggestion" to engage them as implementing agencies; "[t]he status of the SHGs is that of an agent only."[19] The Bombay and Allahabad High Courts subsequently adopted similar reasoning.[20] These decisions recognize collectives as implementing agencies with-

[17] *Mahila Ekta Manch v. Government of NCT of Delhi*, Delhi High Court, 24 January 2023. The decision does not name the NFSA.

[18] *Ipak Karga v. State of Arunachal Pradesh*, Gauhati High Court (Itanagar Bench), 2 February 2026. The decision does not state the group's membership; it is counted as a women's collective under the rule that self-help groups are included regardless of their stated membership.

[19] *Maa Santoshi Swa Sahayata Samuh v. Union of India*, Chhattisgarh High Court, WPC 5063/2021 and batch, 28 April 2022, paras. 76–77.

[20] *Nari Niketan Mahila Mandal v. Union of India*, Bombay High Court, 6 December 2023, para. 55; *Shipra Devi v.*

out establishing an enforceable entitlement to continued participation in welfare delivery.

Where suppliers' interests conflict with beneficiaries' entitlements, courts may explicitly prioritize the latter. Upholding the withdrawal of a mid-day meal contract after an inquiry confirmed complaints against a self-help group, the Madhya Pradesh High Court held that the health of schoolchildren "eclipses the petty and personal interests of the petitioner self help group."[21] Yet the priority accorded to beneficiaries does not eliminate procedural protections for collectives. In Orissa, a court overturned the termination of a self-help group's contract because the authorities had failed to give it a fair hearing. Although the court emphasized that authorities "could not have shut their eyes" to allegations of substandard food, it required them to give the group an opportunity to respond before deciding whether to terminate the contract.[22] Together, these decisions show that courts may protect collectives against arbitrary administrative action without recognizing a right to continued participation in food distribution.

The record also reveals how assessments of collectives' competence shape the terms of their incorporation into welfare delivery. In Karnataka, litigation over the quality of supplementary nutrition brought competing models of production before the High Court. A public interest petitioner questioned whether women's production centers could meet nutritional standards, but the court struck down orders withdrawing arrangements with certified women's groups.[23] In Chhattisgarh, the State defended its decision to centralize take-home ration production on grounds of food quality, while self-help groups challenged the evidence supporting those claims and alleged that the change would benefit private contractors. The courts upheld the State's decision, finding that the groups had no statutory entitlement to continued participation under the applicable legal framework.[24]

These arrangements nevertheless remained subject to administrative and political decisions. In 2025, the Chhattisgarh government began returning ready-to-eat food production to women's self-help groups, awarding contracts in Raigarh district; by February 2026, forty-two groups across six districts had been engaged under a pilot program.[25] Courts could also constrain administrative discretion when officials failed to follow prescribed procedures. In Orissa, a district administration justified a fresh tender by citing "public dissatisfaction over supply of poor quality of Chhatua" raised in grievance camps, even though a subsequent inquiry found nothing adverse against an incumbent group. The High Court struck down the tender because the administration had bypassed the prescribed procedures for reviewing performance and renewing contracts.[26] These cases il-

State of U.P., Allahabad High Court, 1 August 2025.

[21] *Jay Mata Di Swa Sahayata Samooh v. State of M.P.*, Madhya Pradesh High Court, 17 November 2025. See also *Neha Swa Sahayata Samooh v. State of M.P.*, Madhya Pradesh High Court, 21 January 2020.

[22] *Maa Ambika v. State of Odisha*, Orissa High Court, 25 March 2025.

[23] *Sanjivini Mahila Vikasa Seva Sangh v. State of Karnataka*, Karnataka High Court, 27 May 2022.

[24] *Guru Ghasidas Swah Sahayata Samuh v. State of Chhattisgarh*, Chhattisgarh High Court, 28 April 2022; *Kalika Mahila Mandal Swa Sahayata Samuh v. State of Chhattisgarh*, Chhattisgarh High Court, 6 November 2023.

[25] "In a 1st, Raigarh opens women-led anganwadi ready-to-eat initiative," *Times of India*, August 2025; "42 SHGs in 6 Districts Awarded Ready-to-Eat Food Production and Distribution," *Chhattisgarh Top News*, 16 February 2026.

[26] *Nitai Gaura Women's S.H.G. v. State of Odisha*, Orissa High Court, 24 October 2025.

lustrate how collectives' participation may be expanded, withdrawn, or restored through policy decisions, while judicial protection depends heavily on the statutory and procedural framework governing those decisions.

Taken together, these decisions reveal an asymmetry in the legal recognition of women's collectives. Their participation in welfare delivery creates contractual interests and procedural protections that courts can adjudicate. Yet these protections arise from their position as suppliers, not from authority to represent entitlement holders. The cases therefore illustrate how incorporation can strengthen collectives' legal position within welfare provision without necessarily granting them corresponding authority to demand accountability for failures affecting entitlement holders.

The Jharkhand record reveals the other side of this relationship: entitlement holders seeking accountability from welfare providers, including women's collectives. In a petition decided by the High Court in April 2025, three Scheduled Tribe women from Bijka village in Garhwa district alleged that local ration dealers, including the Gulab self-help group, had withheld their rations since January 2024 in retaliation for protests against short distribution. They stated that a joint complaint concerning 45 other families had been submitted to the District Grievance Redressal Officer in June 2024 without result. The Court granted liberty to submit a fresh representation to the Deputy Commissioner (High Court of Jharkhand 2025, paras. 2–6).

The State Food Commission had also heard complaints from Bijka. In January 2024 it considered allegations that 51 cardholder households, comprising 259 people, had received no rations for six months.[27] The District Supply Officer failed to attend the first hearing but later acknowledged that the complaints were substantiated and called on the Gulab self-help group to show cause why its license should not be suspended. The Commission rejected the suggestion that administrative action alone constituted relief, observing that paperwork "cannot fill beneficiaries' stomachs".[28] Nevertheless, it closed the case in March 2024 after recording compliance with its directions.

A complaint from another village in the same panchayat followed a similar course. The Commission referred allegations of withheld rations to the grievance officer, received no action-taken report, and closed the matter on the supply officer's account that some households had received arrears and others were receiving rations normally. By then the complainant had reported further shortfalls, which the Commission directed to be registered separately.[29] An earlier case from Gurdi village in Palamu district similarly involved complaints against a self-help group operating a ration shop, and the Commission directed officials to supply outstanding rations or pay the food security

[27] The Commission's orders do not identify the households concerned, so it is not possible to establish whether they were the same households involved in the subsequent High Court petition.

[28] Jharkhand State Food Commission, Case No. 02/2024, order of 12 February 2024 (author's translation from Hindi).

[29] Jharkhand State Food Commission, Case No. 11/2024. The complaint concerned 48 people who alleged four months without rations. The supply officer reported that 30 had received four months of arrears and the remainder were drawing rations normally. The Commission closed the case in June 2024.

allowance.[30]

These records do not establish that the same households pursued a continuous unresolved complaint, or that the reported corrective action occurred. They do, however, reveal the distinction between administrative closure and verified resolution. The Commission could receive aggregated grievances, hold hearings and issue directions, yet the available orders document no independent verification that affected households received their entitlements.

Like the Commission's orders, the court decisions do not establish misconduct by any collective. They illustrate how incorporation positions collectives in the accountability relationship: the accountability institutions reach them chiefly as the object of complaints, rarely as a channel for the complaints of others.

5.4 The Accountability Track

The Act's accountability institutions nevertheless reach the courts. Grievance officers, State Food Commissions, social audits and vigilance committees are engaged in 80 decisions from 69 proceedings, most of which name the Act (Table 4).[31] In 16 decisions, 14 of them from the Allahabad High Court, courts dispose of petitions with liberty to approach the District Grievance Redressal Officer. In 35 others courts direct officials to use these institutions, ordering them to decide pending complaints or supervising compliance in proceedings such as *Swaraj Abhiyan*. Another 28 concern the establishment or staffing of grievance officers and Food Commissions in at least 10 states, and one decision falls into both of the last two categories.

These cases reveal how unevenly the grievance architecture was established. Four years after the NFSA's enactment, the Supreme Court found that most states had not framed rules prescribing grievance officers' qualifications and that the position was often assigned to officials already responsible for implementing the entitlements under review (Supreme Court of India 2017, paras. 14, 27, 30). Ten states, including Bihar, Jharkhand, Madhya Pradesh and Maharashtra, had not constituted State Food Commissions (Supreme Court of India 2017, paras. 16, 22). Even where commissions operated, appeals were sometimes absent: Meghalaya's commission reported no appeals against grievance officers' orders in 2017–18 and could not establish how many complaints those officers had received (Meghalaya State Food Commission 2018).

Entitlement holders' interests are more prominent on this accountability track. They are asserted

[30] Jharkhand State Food Commission, Case No. 06/2020, hearing order dated 25 September 2020, reproduced in Letter No. 620, 8 October 2020, `https://www.jharkhandsfc.in/docs/pdf/08_10_2020_ltr_no_620.pdf`. A subsequent record stated that no action-taken report had been received.

[31] Three of these decisions were identified in the second round of coding: a Supreme Court notice calling on states to report on the institutions established under Sections 14–16 (*Koili Devi v. Union of India*, 9 December 2019), a further order in *Swaraj Abhiyan* (28 October 2016) and a ration-depot holder's argument that his case should have been decided under Section 29 (*Devinder Singh v. State of Punjab*, Punjab and Haryana High Court, 27 November 2018). The blind second coder classified all three as mentions rather than engagement. Excluding them reduces the engaged count to 77.

Table 4: The NFSA's Accountability Institutions in Court

Panel A. Whose interest the claim asserts, by how the institutions appear					
	Entitlement holders'	Petitioner's own	Mixed	Other	Total
Engaged	40	18	4	18	80
Mentioned only	12	19	3	10	44
Food Commission staffing only	2	7	0	1	10

Panel B. How the institutions are engaged		
	PILs	Total
Petition disposed of with liberty to approach the grievance officer	1	16
Other directions to use the institutions	18	35
Litigation over the institutions themselves	11	28
Both of the last two	1	1
Total	31	80

Notes: Notes: All 1,719 coded decisions. Decisions referring to the internal grievance mechanism (Section 14), District Grievance Redressal Officers (Section 15), State Food Commissions (Section 16), social audits (Section 28) or vigilance committees (Section 29). These institutions are engaged when a party litigates them or the court directs their use. The 80 engaged decisions come from 69 proceedings, of which 58 name the Act. Treating the 16 relegation orders as mentions reduces engaged decisions to 64. "Other" interests are mostly those of public bodies and courts acting on their own motion.

Source: Author's coding of Indian Kanoon decisions.

in half of the decisions engaging these institutions, compared with 13.1 percent of all decisions. Women's collectives, however, are absent as claimants.

Collectives and the accountability institutions appear together in only five decisions (Table 5). Four place the collective on the delivery side. In two Madhya Pradesh decisions, women's cooperatives operating ration shops argued that vigilance committees should have conducted the inquiries against them. A self-help group's dispute over a mid-day meal contract was referred to an official acting as grievance officer. In Jharkhand, a self-help group operated the ration shop against which cardholders had complained. Only one decision assigns a collective an accountability role. Supervising NFSA implementation in Manipur in 2020, the High Court invited the Meira Paibis, the state's women's movement, to help cardholders submit complaints and inspect records, without making them parties.[32]

Table 5: Decisions in which Women's Collectives and the Accountability Institutions Meet

Decision	Collective's role	How the institutions appear
Manipur High Court, 2020	Meira Paibis, designated by the court to help; not a party	The court supervises implementation and invites women's groups to help cardholders complain and to inspect records
Madhya Pradesh High Court, 2019 (two decisions)	Women's cooperative running a ration shop	The cooperative argues, in its own defense, that the vigilance committee should have held the inquiry
Madhya Pradesh High Court, 2024	Self-help group holding a mid-day meal contract	The contract dispute is sent to the chief executive officer acting as grievance officer
Jharkhand High Court, 2025	Self-help group running the ration shop complained against	Cardholders had complained to the grievance officer without result; the court sends them to the Deputy Commissioner

Notes: The five decisions, among all 1,719 coded, in which a women's collective appears and the accountability institutions are engaged.

Source: Author's coding of Indian Kanoon decisions.

The litigation evidence therefore reveals two largely separate institutional tracks. Women's collectives appear predominantly as suppliers defending contractual and administrative interests, while the accountability institutions reach the courts through individual claimants, public interest litigation and judicial supervision. Their rare intersections also expose potential conflicts between collectives' economic interests as providers and the interests of entitlement holders. The court record cannot explain why collective accountability claims seldom become litigation. Section 6

[32] *Human Rights Alert v. State of Manipur*, Manipur High Court, 13 May 2020.

examines evidence of collective grievance activity outside the courts.

6 Evidence from Collectives

The absence of collectives from accountability litigation admits two interpretations. They may rarely pursue entitlement failures on behalf of others, concentrating instead on savings, credit, livelihoods, and welfare delivery. Alternatively, they may take up such failures through channels that leave little trace in the courts, including panchayats, frontline officials, and grievance bodies. Litigation alone cannot distinguish these explanations. The survey and organizational evidence examined here illuminates different parts of the accountability process: assistance in obtaining entitlements, collective identification and aggregation of failures, and the pursuit of corrective action. These activities are related, but they are not equivalent measures of accountability.

In the 2022 survey of SEWA-affiliated women, 81.3 percent of households reported holding a ration card and 73.7 percent drew grain from the Public Distribution System (PDS). Most respondents reported obtaining these entitlements without assistance (Table 6, Panel A). Among ration card holders, elected representatives or local offices were the most commonly identified intermediaries, cited by 20.5 percent, compared with just 2.9 percent naming SEWA, its resource centers, or its local leaders, known as *aagewans*.[33] Even among women affiliated with a collective organization, routine access to food entitlements thus appears to depend more on political and administrative channels than on the organization itself. These responses, however, concern assistance in obtaining entitlements, not specifically the pursuit of grievances.

The pandemic revealed another role for collective infrastructure. Among 452 respondents who had visited a SEWA resource center, 36.5 percent reported obtaining rations through the center during Covid-19, equivalent to 12.6 percent of the full sample. Among center visitors, 42.4 percent of Scheduled Caste and Scheduled Tribe women reported receiving rations, compared with 30.9 percent of women who were neither SC/ST nor Muslim ($p = 0.016$). The two groups were equally likely to have visited a center.

Organizational records provide more direct evidence of collective grievance activity. PRADAN reports help desks in 511 gram panchayats across five states, through which self-help groups raise recurring problems with panchayat officials, including payments demanded by anganwadi workers, ration cards not updated after births, and maternity benefits denied under Section 4(b) of the NFSA (PRADAN 2025). SEWA Bharat's community monitoring committees document anganwadi attendance and the receipt of entitlements by pregnant and lactating women (SEWA Bharat 2024), while Seva Mandir's village collectives have worked with officials to reopen anganwadi centers that had ceased functioning (Seva Mandir 2021). These accounts document forms of col-

[33] These figures may understate collective intermediation. Evaluation-team notes indicate that some women who named elected representatives or officials had first been connected to them by an aagewan. The survey recorded only the final intermediary.

Table 6: Food Entitlement Access and Collective Intermediation, 2022

Panel A. Assistance with routine food entitlements (%)		
	Ration card holders	PDS users
No assistance	61.2	60.0
Elected representative or local office	20.5	19.7
Ration dealer	3.1	4.0
SEWA, resource center, or aagewan	2.9	3.2
Family or neighbor	2.1	2.1
Other or unknown	10.2	11.0
N	1,063	964
Panel B. Obtained rations through a SEWA resource center during Covid-19		
	Percent	*N* visitors
Scheduled Caste or Scheduled Tribe	42.4	203
Muslim	43.8	16
Neither SC/ST nor Muslim	30.9	236
All visitors	36.5	452

Notes: Telephone survey of 1,308 SEWA-affiliated women entrepreneurs and program participants across ten Indian states, February–March 2022. Panel A reports the percentage of ration card holders ($N = 1,063$) and PDS users ($N = 964$) identifying each source of assistance. "Elected representative or local office" combines free-text responses naming a mukhiya, pradhan, sarpanch, ward member, municipal councilor, or panchayat or block office. Panel B reports the percentage of SEWA Shakti Kendra visitors who obtained rations through a center during the Covid-19 pandemic. Three visitors identify as both Muslim and SC/ST and appear in both categories; the "All visitors" row counts each respondent once. The difference between SC/ST and neither SC/ST nor Muslim respondents is statistically significant ($p = 0.016$, chi-squared test excluding Muslim respondents).
Source: Author's calculations from the Udyami survey (Joshi, Hazra, et al. 2023).

lective intermediation largely invisible in the litigation record, although they cannot establish how frequently such activities occur or whether they secure effective remedies.

The significance of this activity lies partly in aggregation. A help desk documenting twenty denials of maternity benefits across four villages may reveal an outdated beneficiary list or a misapplied eligibility rule that separate complaints would not readily expose. Yet in the organizational accounts examined, such evidence is directed to panchayats or program officials. None describes a complaint to a District Grievance Redressal Officer, an appeal to a State Food Commission, or a request for a statutory social audit. Nor does any of the 1,719 court decisions record a collective pursuing other entitlement holders' claims through the NFSA's grievance procedures. These findings do not establish that collectives never use formal channels, but suggest that their documented grievance activities operate largely outside them. Collective capacity to identify failures does not necessarily translate into access to institutions empowered to provide remedies.

The Jharkhand State Food Commission's 2024 orders illustrate a further distinction between the processing of aggregated complaints and the verification of corrective action. Eight of the sixteen available orders concern more than one household, including the complaint involving 51 households in Bijka and another involving 48 people from a nearby village. None identifies the complainants as members of a self-help group or other women's collective; in Bijka, the self-help group was among the ration dealers complained against. The Commission received complaints, held hearings, issued notices, and directed officials to act. Most proceedings were subsequently closed on an official's report of compliance, an assurance, or the complainant's withdrawal. None of the sixteen available orders documents independent verification by the Commission of an official's account of compliance. These cases do not establish how frequently the Commission resolves grievances effectively. They show, however, that the formal processing and closure of aggregated complaints can be documented without establishing that the underlying entitlement failures have been remedied.

Taken together, the evidence qualifies both interpretations of the litigation record. Women's collectives are not the principal intermediaries through which surveyed women report obtaining routine food entitlements. Yet organizational records show that some collectives identify recurring failures, assist excluded households, and aggregate grievances. Their documented activities are directed largely toward local political and administrative channels rather than the NFSA's statutory grievance institutions. The Jharkhand orders reveal a further limitation: even when aggregated complaints enter the formal system, administrative closure may not verify resolution. The missing middle is therefore not simply a lack of collective capacity or legal standing, but an uncertain connection between collective evidence, enforceable administrative response, and verified corrective action.

7 What Collective Accountability Requires

The preceding sections reveal a gap between women's collectives' capacity to document failures in welfare delivery and their institutional authority to secure a response. In litigation, collectives appear predominantly as providers, while outside the courts some aggregate grievances through local officials and elected representatives (Sections 5 and 6). The question is how evidence gathered by collectives can generate enforceable obligations without reproducing inequalities in representation or making providers responsible for monitoring themselves.

7.1 Three Relationships between Collectives and the State

The findings illustrate three distinct relationships between collectives and the state. The first is *administrative incorporation*, in which collectives perform functions defined by the state, such as managing fair price shops. Incorporation can improve welfare delivery, as Chhattisgarh's Public Distribution System reforms suggest (Krishnamurthy, Pathania, and Tandon 2014), and expand women's participation in public life, as Kerala's Kudumbashree demonstrates (Williams et al. 2011). But it can also expose collectives to political capture and unpaid administrative work. In Palakkad, party networks influenced Kudumbashree leadership, disadvantaged communities were underrepresented, and women performed administrative tasks for government programs (Devika 2016).

The second is *state-authorized oversight*, through institutions such as social audits and vigilance committees. Under MGNREGA, Andhra Pradesh developed a state-supported social audit system that recruited village resource persons, including women from self-help groups, while maintaining organizational separation from the officials whose work they examined (Aakella and Kidambi 2007; Adhikari and Heller 2024). Under the NFSA, social audits are engaged in only eight of the 1,719 decisions and vigilance committees in fifteen. In just one decision, from Manipur, a women's collective acts as a monitor, at the court's invitation.

The third is *obligation-based responsiveness*, under which collective claims trigger duties to register complaints, investigate failures, issue reasoned decisions, and document corrective action. The NFSA establishes grievance officers and State Food Commissions for these purposes, and District Grievance Redressal Officers appear in 50 of the 80 decisions involving the accountability institutions. Some state rules, including Kerala's, explicitly recognize group and representative complaints. Yet the Jharkhand State Food Commission's orders illustrate the limits of formal grievance processing: complaints may be received, investigated, and closed without the available record establishing that relief reached affected households. Obligation-based responsiveness therefore requires attention not only to administrative decisions, but also to how compliance is documented, verified, and challenged.

These relationships are neither successive stages of empowerment nor equally developed. Women's

collectives have been extensively incorporated into welfare delivery and, to a lesser extent, authorized to monitor implementation, but their role as independent accountability claimants remains weak. Formal recognition alone, however, does not guarantee influence. Women's ability to exercise authority also depends on social norms, perceptions, and the legitimacy accorded to their claims (Agarwal 2026). The challenge, therefore, is to connect collective participation to enforceable obligations on public authorities while ensuring that grievances lead to corrective action rather than merely administrative closure.

7.2 The Mechanism

The proposed reform would strengthen the NFSA's existing grievance architecture rather than create a new institution. The central problem is not simply whether collectives may submit complaints. Some state rules already recognize representative claims, and the Jharkhand State Food Commission has received and acted on aggregated grievances. The more consequential question is what obligations follow once a complaint enters the system. An effective mechanism would connect collective documentation of entitlement failures to reasoned administrative decisions, documented corrective action, and meaningful opportunities to verify and contest official accounts of compliance. Four elements are central.

Who may file. Grievance procedures should recognize complaints from groups of beneficiaries, self-help groups, federations, societies, cooperatives, and other representative organizations, including those acting on behalf of non-members. Self-help groups should be able to file through their federations without separate registration. The NRLM's network provides an institutional foundation: by December 2023, 16,684 of its 32,205 cluster-level federations had been registered (Deendayal Antyodaya Yojana–National Rural Livelihoods Mission 2024). Registration may clarify responsibility for a complaint, but should not exclude informal groups or joint complaints by affected households. Representation must also protect consent and confidentiality.

The content of a complaint. Procedures should explicitly permit a single complaint documenting recurring failures across households or villages. For example, a federation recording fifty denials of maternity benefits across five villages should be able to submit one documented complaint rather than fifty separate claims. Such complaints should identify the entitlements withheld, the affected households where appropriate, and any apparent common administrative cause. Documentation requirements must remain proportionate to the capacities of grassroots organizations, without limiting beneficiaries' individual rights to seek redress.

Response, compliance, and verification. Grievance officers should register aggregated complaints, investigate recurring failures, and issue reasoned decisions within prescribed periods. Where several denials arise from the same administrative practice, the decision should address that practice rather than treating each case in isolation. Responsible authorities should document corrective action and provide compliance reports to complainants. These reports should distinguish admin-

istrative measures, such as notices or disciplinary proceedings, from relief actually delivered to affected households.

Complainants should have an opportunity to challenge official accounts of compliance. Women's collectives may help households check whether promised relief has been received, but this role must be distinguished from independent verification by grievance institutions or other authorized bodies. A collective that brings a complaint should not automatically be treated as an impartial verifier, particularly where its members or affiliated organizations have interests in the services under review. Where compliance remains disputed, complainants should have a clear route to review by the State Food Commission. Reasoned decisions and compliance reports should be made publicly accessible in appropriately anonymized form, while protecting the identities and personal information of affected households.

The Jharkhand cases illustrate why these distinctions matter. The Commission received aggregated complaints, held hearings, and directed officials to act. In Bijka, it explicitly rejected the suggestion that administrative action alone constituted relief. Yet the available orders do not document independent verification that affected households received their entitlements. The institutional weakness illustrated by these records is therefore not necessarily the absence of grievance procedures or official awareness of entitlement failures, but the uncertain connection between administrative action, verified relief, and opportunities to contest disputed compliance.

The legal basis. The NFSA already provides much of the foundation. Sections 14 and 15 establish grievance procedures, Section 16 empowers State Food Commissions to investigate violations and hear appeals, and Section 29 requires vigilance committees to report irregularities (Government of India 2013). Bihar permits institutional complaints under its internal grievance mechanism, West Bengal requires action on vigilance committee information, and Kerala expressly recognizes representative complaints (Government of Bihar 2017; Government of West Bengal 2016; Government of Kerala 2018). Section 33 authorizes penalties for failures to provide recommended relief, while Section 40 permits states to prescribe grievance procedures, officers' powers, time limits, and appeals. These provisions suggest that much could be accomplished through state rules, although the legal basis for representative appeals, mandatory independent verification, and review of disputed compliance warrants further examination.

The reform would therefore change less about whether collectives may complain than about what follows from their complaints. It would not guarantee delivery, eliminate political brokerage, resolve failures in procurement and beneficiary identification (Khera 2011), or prevent officials from making poor decisions. Nor would it substitute collective monitoring for the state's responsibility to enforce entitlements. Its purpose would be to make inaction, inadequate remedies, and disputed compliance more visible and open to review.

7.3 Reach, Inequality and Conflicts of Interest

The potential reach of collective grievance procedures is substantial but uneven. The NRLM reports more than nine million self-help groups representing over 100 million rural households (Government of India 2025), but these figures say little about active participation. Civil society organizations are unevenly distributed (Werker and Ahmed 2008; Brass et al. 2018; Usmani, Jeuland, and Pattanayak 2024). Caste, education, and landholding influence participation within villages (Jakimow and Kilby 2006; Nichols 2021). A study of self-help groups in 386 villages in eastern India found higher attrition among disadvantaged caste households and greater inactivity among groups without educated members (Baland, Somanathan, and Vandewalle 2019). These patterns reflect the *fractal inequality* of rural India, in which hierarchies persist within caste and jati groups as well as between them (Joshi, Kochhar, and Rao 2022). Women best positioned to pursue collective grievances may therefore be relatively advantaged even within marginalized communities.

These inequalities are not only material or organizational. Social norms and perceptions also shape the claims that are regarded as legitimate, including within public institutions (Agarwal 2026). Formal recognition of collective complaints may therefore leave important barriers intact if officials discount the claims of disadvantaged women or if local hierarchies determine who speaks for a collective. At the same time, collective action can help women overcome individual constraints on mobility, public participation, and bargaining power. The institutional challenge is to make these gains accessible to women whose claims might otherwise remain unheard.

The SEWA survey offers a qualification. Scheduled Caste and Scheduled Tribe women who visited resource centers were more likely than other visitors to report obtaining rations through them during the pandemic. This shows that collective infrastructure can serve marginalized women who reach it, but not that it reaches those who remain excluded.

A second concern is conflict of interest. Collectives incorporated into welfare delivery may acquire material interests that diverge from those of entitlement holders. In four of the five decisions where collectives and accountability institutions intersect, the collective appears on the delivery side. In Bijka, the Gulab self-help group was among the ration dealers complained against. The records do not establish wrongdoing, but they demonstrate why a provider cannot automatically be treated as an independent representative of beneficiaries. A collective or federation should not investigate or verify complaints concerning contracts or shops held by its own groups.

Four safeguards follow. Grievance procedures should remain open to organizations beyond government-sponsored networks, preventing any single federation from controlling access. Representative complaints should protect consent, confidentiality, and the interests of non-members. Providers and affiliated federations should be excluded from reviewing complaints concerning their own supply arrangements. Finally, State Food Commissions should publish anonymized information on the geographic and social distribution of complaints, including caste and jati where data can be collected reliably and ethically, so that inequalities in access to redress become visible.

Collective accountability also imposes costs. Documenting failures requires time, travel, and repeated engagement with officials, potentially adding to women's unpaid work. Feminist scholarship describes these cumulative burdens as *depletion* (Rai, Hoskyns, and Thomas 2014), and studies of Kudumbashree show how expanded public participation can coexist with additional administrative responsibilities (Devika 2016). MGNREGA's payment of village resource persons for social audits suggests an alternative: providing resources for documentation, representation, and verification (Aakella and Kidambi 2007). Without such support, stronger grievance procedures risk transferring further responsibilities to women without redistributing authority or resources.

Obligation-based responsiveness could strengthen the claims of women who are already organized. For those who remain unorganized, investments in inclusive representation, independent oversight, and accessible individual grievance procedures are key.

8 Conclusion

India's right to food represents a major achievement in rights-based welfare policy. Through the PUCL litigation and the NFSA, nutritional entitlements were defined, grievance procedures established, and public authorities made formally accountable for implementation. Yet this architecture developed alongside an extraordinary expansion of women's collectives without consistently connecting their organizational capacity to enforceable obligations on the state. The result is a gap between the recognition of women as participants in welfare delivery and the recognition of their organizations as independent accountability claimants.

The analysis of 1,719 court decisions reveals two largely separate tracks of litigation. Women's collectives appear predominantly as suppliers defending contracts and licenses, while the Act's accountability institutions are invoked largely by individuals, public interest petitioners, and public bodies. Across the entire corpus, no collective brings, joins, or represents a claim on behalf of other entitlement holders through the NFSA's accountability institutions. This does not establish that collectives rarely pursue such claims outside litigation. Rather, it shows that the legal relationships through which collectives become visible in the judicial record are overwhelmingly those of welfare provision. Contracts and licenses generate recognizable economic interests and procedural protections that courts can adjudicate. The potential role of collectives as representatives of entitlement holders, by contrast, is almost entirely absent from the litigation examined here.

Evidence outside the courts qualifies this picture. Survey and organizational records show that women's collectives assist excluded households, identify recurring failures, and aggregate grievances, although their documented activities are directed largely toward local officials and elected representatives rather than the NFSA's formal grievance institutions. The Jharkhand State Food Commission's orders reveal a further distinction between access to grievance procedures and effective redress. The Commission received aggregated complaints, held hearings, and directed officials

to act, but the available orders do not document independent verification that corrective action reached affected households. The problem is therefore not simply whether collective grievances can enter the formal system, but what obligations follow once they do.

These findings illuminate the political economy of selective incorporation. State-supported collective organization can expand women's economic opportunities, public voice, and administrative responsibilities without necessarily strengthening their authority as independent claimants. Incorporation may also create material interests that diverge from those of entitlement holders, particularly when collectives become suppliers whose performance is itself subject to complaint. The distinction between administrative incorporation, state-authorized oversight, and obligation-based responsiveness is therefore consequential. The first two relationships enable collectives to deliver or monitor public services; neither necessarily requires officials to investigate their claims, provide remedies, or demonstrate compliance. Collective participation alone does not determine whose interests organizations represent or what obligations the state accepts toward them.

Strengthening collective accountability need not require new organizations or a separate statutory right of collective standing. The NFSA already establishes grievance procedures, and some state rules explicitly recognize group and representative complaints. The more consequential reform would connect aggregated evidence of entitlement failures to reasoned administrative decisions, documented corrective action, and meaningful opportunities to verify and contest official accounts of compliance. Such arrangements would not guarantee effective delivery, but could make inaction and unresolved failures more visible and contestable. Their effectiveness would also depend on safeguards against conflicts of interest and social exclusion, independent verification, and resources to ensure that accountability work does not simply add to women's unpaid responsibilities.

The evidence has important limitations. Court decisions capture only disputes that reach the judiciary, Indian Kanoon's coverage is incomplete, and language-model coding remains subject to classification error despite independent checks. The survey is not representative, organizational records reflect the accounts of participating institutions, and the Jharkhand orders are illustrative. Nor does the analysis establish that stronger grievance obligations would improve welfare delivery. Some failures may reflect weak enforcement of existing rules rather than gaps in institutional design. Comparative research across states with different grievance procedures could examine whether collective complaints produce more effective remedies, whose claims receive attention, and what costs women bear in pursuing them.

The broader implication extends beyond India's food-security system. Governments have invested heavily in building women's collective capacity, often expecting participation to strengthen accountability. But organizing citizens, incorporating them into public programs, and recognizing their authority to demand a response are distinct institutional achievements. The challenge is not simply to expand women's participation, but to establish relationships in which their organizations can act independently, represent those otherwise excluded, and require the state to answer for

failures in the rights it has promised.

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