

# CONSTITUTIONAL FEDERALISM AND THE ABROGATION OF ARTICLE 370: A REVIEW OF JUDICIAL REASONING AND CONSTITUTIONAL MORALITY IN INDIA

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## Abstract

*This paper looks into what happened with Article 370 which was part of the Constitution of India, and how its removal affects both the Constitution and the Federal Government's relationship to the States. Historically there has been an argument among scholars about what type of arrangements are appropriate to accommodate regional differences (asymmetric) within the overall framework of a comprehensive Constitution (syncretic). The removal of Article 370 from the Constitution of India in 2019 was a game changer in terms of our understanding of how we define and use a Constitution. Issues of consent, boundaries of power under our Constitution, and relationships between the Federal and state governments – all these are now very much open questions that were raised by the abrogation of Article 370.*

*This research uses a systematic review and doctrinal approach that relies only on secondary sources. In order to assess the interplay between federal design, interpretative methodologies, and normative concepts in relation to the repeal of Article 370, it examines constitutional provisions, Constituent Assembly Debates, seminal court rulings, and freely available legal research. Constitutional ethics, responsibility, and federal justice; judicial reasoning and doctrinal interpretation; and federalism and asymmetric constitutional architecture are the three main points that the article revolves around.*

*According to the findings, federalism is still a constitutional ideal in India, but in practice, the country is moving toward more centralization. Federal expectations based on consent and negotiated autonomy are not given much doctrinal weight by the judiciary, who instead place a premium on constitutional language and procedural legitimacy. Constitutional morality, according to the study's normative findings, requires more institutional restraint, explanation, and openness in situations requiring massive government reorganization. Article 370's repeal, the study argues, is a constitutionally mixed bag, with far-reaching consequences for future federal disputes and India's changing constitutional character as a whole.*

**Keywords:** Article 370, Indian federalism, constitutional interpretation, constitutional morality, centre–state relations.

## 1. INTRODUCTION

The revocation of Article 370, which outlined the distinct status of Jammu and Kashmir in the relationship to the Union of India, is one of the most significant changes to the Constitution of India since the country became independent. The article affects a number of core components of Indian federalism, constitutionalism, and judicial review, and therefore has been extensively addressed by the academic community

for a number of years. One of the central questions raised by the revocation of this article relates to whether or not the structure of Indian Federalism provides for or prohibits the legal ability of the central government to utilize its powers to intervene in the political and security affairs of a state or territory of the Union of India in times of significant political or security crises, or whether such authority is exercised in partnership between the federal and state governments. Article 370 provided Jammu and Kashmir with a unique constitutional status within the Indian Union and therefore represented an asymmetric federal system of government historically. The repeal of Article 370 and its subsequent transformation into the Union Territories of Jammu and Kashmir and Ladakh in 2019 clearly illustrates a significant shift away from such an asymmetric federal structure (Deb, 2019).

The current situation does not only impact the regional government, but it also impacts the overall character of the Indian Constitution. The way in which Indian federalism has developed is through centralising power at the national level, through the addition of many national powers to the Constitution; as such, the Indian Constitution has allowed for differing levels of autonomy to be built into its federal structure. Many of the ways in which such pluralism can exist are described in various articles that outline the asymmetric relationships between states and between the national government and individual states, such as Article 370. The removal of this article posed fundamental questions about how long this type of agreement can survive, and how much room exists for renegotiating the terms of federalism if a state has not consented to a change in those terms. Legal theorists have pointed out that J&K was a unique state that had a unique constitution. Thus, the changes to J&K are a critical turning point in how the relationship between the Indian Constitution and the protection of state diversity will be interpreted in the future (Amico di Meane, 2021).

Discourse regarding autonomy, statehood and constitutional restoration remains at the forefront of public interest, therefore, the issue is ongoing. Reliably sourced international news outlets are reporting on the ongoing calls for the reinstatement of statehood/ special status, further indicating that the effects of the 2019 decision on the Constitution have not been fixed nor were they only historical (Reuters 2024). As a constitutional event that will affect the continuing ability of the federal government to maintain democratic accountability, institutional trust, and preserve its social contract, the continuing nature of this contestation points to the need for research into the abrogation of Article 370 to be more than a simple political act.

The seeming dichotomy in terms of constitutional practice in India is one of the key research challenges that this thesis intends to investigate. One of the most important tenets of the Constitution that has been consistently supported is the principle of Federalism. The Constitution allows for the establishment of a strong Union to govern the country when it comes to changes made to the Constitution, therefore, there is tension created between Federal expectations, the Constitutional Convention, and the text/words of the Constitution. As to whether India's Federalism is a substantive Constitutional Guarantee and is a flexible structure which is open to interpretation through formal Constitutional structures, the significance of the abrogation of Article 370 has brought to focus the contradiction (Muzafar, 2023).

In addition to analyzing judicial reasoning or academic criticism regarding Article 370 (with respect to Constitutional Federalism), the second purpose of the present study is to investigate how Judicial Interpretive Approaches shaped the Supreme Court's Justificatory Framework in evaluating constitutional change. Lastly, it seeks to identify the role of "Constitutional Morality" in assessing politically charged changes made through constitutional reform, notably with regard to the division of power among government branches and citizen representation in the electoral process (Rai, 2024).

This research used a doctrinal and systematic methodology to identify authoritative sources of law and reputable sources of freely available legal academics. Primary sources of law included the Constitution of India (All India

Government, 2007) and the official opinion of the Supreme Court of India regarding the abrogation of Article 370. For both historical and interpretative context the study relied upon the relevant Constituent Assembly Debates (The Constituent Assembly of India, 1949). The secondary sources of freely available option included peer-reviewed legal journal articles, research and working paper published by respectable research universities and repositories like SSRN, and law journals published by educational institutions. The methodology used by the researchers involved systematic approach to source identification, thematic filters, thematic coding, and issue-based synthesis/deduction.

## **2. FEDERALISM AND ASYMMETRIC CONSTITUTIONAL DESIGN**

### **Conceptual foundation of federalism under the Indian Constitution**

India's governmental structure is characterized by a robust center and a clear division of authority, leading many observers to view it as either quasi-federal (or) asymmetrical. Unlike conventional federations, therefore, the Indian model was purposely created with both a focus on maximizing administrative efficiencies and on achieving national integration in a vastly heterogeneous post-colonial state. It is this constitutional framework that provides the structural foundation of federalism in India. The constitutional allocation of powers between the Union and States is located within the Seventh Schedule, where legislative, executive, and fiscal powers are listed. The Government of India (2007) offers commentary that the Union's possession of residual powers demonstrates a deliberate act in favour of centralization. This decision was made out of concern that excessive decentralization might cause a disruption in political stability and a fragmentation of territorial integrity after the removal of colonial rule.

Judicial interpretations of the Constitution have confirmed that federalism is among the constitutional restrictions on Parliament's power to alter the federal structure to undermine its core tenets. But federalism as understood in India does not mean that individual states have unchecked power. Rather than acting outside of that framework, the federal government will act only when it is permitted by the constitution to act which will only be in the most severe circumstances. As the understanding of this limitation has come to evolve and develop in practice, there is an increasingly complex and intertwined set of federal principles relative to the expectations of state autonomy in those instances where autonomy is ultimately subject to the supremacy of the constitution and the interests of the nation as a whole. The Constitution demonstrates this framework of the federal government through its structural classifications and functional compositions and creates opportunities for flexibility while still being held to the discipline of the constitution (Muzafar, 2023).

### **Asymmetric federalism and the constitutional purpose of Article 370**

Asymmetric federalism is a situation in which some of the constituent entities within a country have unequal levels of power or status due to the differences in the cultural, political and historical context that govern that constituent entity. The Indian Constitution is one example of a federal structure where there is a significant imbalance between the states as indicated by Article 370. Article 370 created a unique status for Jammu and Kashmir by limiting the Indian Constitution's automatic applicability, and by making the extension of central legislation conditional on agreement or consent. The article was intended to be a temporary measure to address the unique circumstances of Jammu & Kashmir being accepted into India and the political environment at the time of enactment of the Constitution.

The debates in the Constituent Assembly of India that created the Constitution support the notion that Article 370 is a temporary disconnect from traditional federal principles as a necessary and practical response that would accommodate the regional interests, honour the terms by which Jammu and Kashmir acceded to India, and allow time for political normality to be established prior to incorporating the full constitutional provisions applicable to

Jammu and Kashmir (Constituent Assembly of India, 1949). As it was concluded through negotiation between the Indian Government and The Jammu & Kashmir Government on 5th August 1947, Article 370 represents both a compromise between National sovereignty and regional autonomy. The imbalanced circumstances highlight how nations can maintain their Constitution under an overarching framework while still allowing for the diversity inherent in the country through many different constitutional arrangements.

### **Federalism tensions: autonomy, integration, and constitutional transformation**

The Revocation of Article 370 has exposed some of the fundamental tensions present within an asymmetric Federal System. These include the extent of unilateral authority for the Union to unilaterally force the implementation of previously negotiated and politically compromised measures for constitutional integration, as well as the functions of asymmetric arrangements in terms of political flexibility, i.e., are they dynamic instruments of political reconfiguration? or Are they constitutionally secured institutions that serve as tangible promises/assurances made to the sub-national entity by the Federal Government?

Academic literature related to law has raised many issues about the impact of the constitutional status transformation of Jammu and Kashmir on the stability of the Federal Structure and the ability of the Federal Government to restructure its relationships with the States and territories based on their 'consent' through negotiated agreements. The Repeal of Article 370 has reignited the debate about the sustainability of structurally unequal federal entitlements, as well as the extent to which constitutional flexibility may undermine federal confidence by replacing federal autonomy-centric provisions (Deb, 2019). These disputes reflect a greater constitutional issue—how the federal structure of India achieves both separate and equal status, with primary reliance on the former over the latter.

## **3. JUDICIAL REASONING AND DOCTRINAL INTERPRETATION**

### **Doctrinal approach to constitutional interpretation in politically sensitive cases**

Persuasive Constitutional Reasoning (PCR) can be defined as the approach to a contentious constitutional conflict based on the four key areas of the Constitution: the Constitution's structural framework; the democratic accountability of government at the state and federal levels; the institutional restraints of power within respective branches of government, and the interpretation of the Constitution based solely on the text. To provide for the legitimacy of an interpretative argument in instances of court decisions that have broad political consequences, the courts must provide an explanation as to why they are choosing one interpretative argument over another. This is particularly important in court cases involving comprehensive judicial reforms; the legitimacy of an interpretation in these instances is determined by the clarity and coherence of the argument provided for support of that conclusion. Thus, when attributing PCR to constitutional controversies, it is important to demonstrate how the interpretations fit within the scope of the Constitution's structural framework, democratic accountability, and institutional restraints of power. Doctrinal study indicates that when an interpretation of a statute has significant political consequences, courts are obligated to give the reasons for adopting their interpretive choice and rejecting other interpretations. This is particularly true in cases when the judiciary has upheld a comprehensive constitutional reform. As such, the legitimacy of the interpretive approach is determined by the clarity and coherence of the reasoning utilised (Rai, 2024).

### **Judicial handling of federal structure and executive–legislative processes**

The Federalism or Division of Powers model greatly influenced Judicial involvement in disputes regarding the states' ability to exercise self-government (Federalism). Historic Tariff Parity was addressed in many Federalist Forum decisions that established precedent for Judicial interference in State matters. One decision that established Precedent happened to be *S.R. Bommai v. Union of India*, where the Supreme Court held that Federalism as a

constitutional concept exists as a fundamental right under our Constitution. Further, *Bommai v. Union of India* established that the Union's judicial powers are limited to the Constitution and subject to Judicial Review. The Federal Government's accountability was further highlighted in *Bommai v. Union of India* as the Supreme Court reiterated that Federal Executive action taken under Article 356 cannot be protected from review by the Courts based on Executive satisfaction (Supreme Court of India, 1994).

This set of laws is used as guidance when analyzing how the ways executive and legislative branches of Government interact with one another impact States' rights. By following Judge Bommai's decision, future cases brought before courts would look to see whether or not any action taken by the Union fell within the confines of the Constitution, and if the Union had violated a State's ability to act and operate in accordance with the Constitution, which could negatively impact it. The Union has been treated by Courts as exercising constitutional authority while also being restricted from eliminating State Sovereignty for political purposes, so historically the balance between Constitutionally-Mandatory Powers (the Union's) and Constitutionally-Required Restrictions has been maintained. Most notably (with a couple of exceptions), cases after Judge Bommai's decision, involving structural changes in State-Federal relations, have continued to rely on his judicial philosophy.

### **The Article 370 abrogation judgment as doctrinal evidence**

To understand how interpretative approaches are used in the context of federal transition, the significance of the Supreme Court's ruling to uphold or revoke Article 370 is a key piece of doctrinal evidence. The Court stated that Article 370 was supposed to be in view for a determined amount of time only, and therefore it was decided according to constitutional protocol and not based on an irreversible federal guarantee. Accordingly, the Court stated that during this period, the Constitution's authority was exercised by the President and Parliament under the Constitution's sovereign authority, and followed proper protocol rather than past political expectations.

The Court weighed the wording of the Constitution against negotiated understandings between Federal entities, as well as the elements of temporality, constitutional design, and consent that would otherwise have been a consideration. The ruling reflected a doctrinal bias. It supported the belief that there is a preference for a single, unified set of laws to create an integrated government and that the Union has the authority to amend the constitution pursuant to methods that are set out. Still, many commentators have argued that the ruling raises broader challenges around the legitimacy of asymmetrical federal systems and the ability of courts to safeguard the equilibrium of the federation (Supreme Court of India, 2023). Consequently, the ruling will serve as a basis to examine the process of interpreting a constitution and how this serves as a mechanism for reconciling the difference between federal principles and amending a constitution.

## **4. CONSTITUTIONAL MORALITY, ACCOUNTABILITY, AND FEDERAL JUSTICE**

### **Constitutional morality as a standard in constitutional adjudication**

In India, constitutional morality is a big part of how the courts decide constitutional cases. It tells constitutional actors to go beyond the specific text of constitutional legislation when they interpret, implement, and enforce them. It indicates that you are committed to defending the basic ideas of democracy, equality, the rule of law, individual rights, and the responsibilities of institutions that are spelled forth in the constitution. Constitutional morality says that those who make decisions, notably judges, should follow the word and spirit of the Constitution instead of vague moral arguments. When it comes to adjudicatory circumstances including structural power transfers or unusual constitutional arrangements, constitutional morality plays a crucial role since concerns of legitimacy and fairness cannot be fully addressed by formal legality alone (Constitution of India, n.d.).

Although clear textual safeguards are weak or imprecise, the safeguarding of constitutional values has been justified in judicial practice by invoking constitutional morality. Courts are enjoined to check if authority is in line with democratic accountability and rights-based governance while interpreting the constitution, rather than just

validating it. The courts must pay close attention to the effects of constitutional reform on representative institutions, regional autonomy, and the balance of power when considering issues involving federal restructuring, according to constitutional morality. The moral principles enshrined in the Constitution provide as a guide for judges to follow when interpreting the document and making decisions on changes that might have political implications.

### **Federalism, constitutional morality, and institutional restraint**

Some have argued that stricter criteria of explanation and institutional constraint are required under constitutional morality if a change to the constitution upsets the federal balance. Both the formal delegation of authority and the informal maintenance of confidence and respect among constitutional components are foundational to federalism as a constitutional norm. When modifications to the constitution are made by the executive branch and have an impact on the autonomy of the states, there should be more explicit reasoning, better procedural protections, and evidence of need according to this view of constitutional morality. The judiciary's responsibility to examine the application of constitutional provisions for respect to authority and values is an example of institutional constraint in this setting.

According to institutional analyses of the Supreme Court's Article 370 decision, the Court gave more weight to formal procedure and the wording of the constitution than to more generalized federal considerations like consent and democratic representation. Although the ruling supported the Political establishment's constitutional powers to unify this country, it raised questions about whether the balance between Federal power and State sovereignty was adequately evaluated (Rai, 2024). The strength of the concept of the "Constitution and morality" may be one of the best checks when there are proper procedures in place in within the government regarding the Constitution. It also shows the contradiction between constitutional authority and constitutional restriction.

### **Accountability outcomes: rule of law, democratic representation, and constitutional trust**

When making a significant and contentious modification to the constitution, accountability becomes even more important. Whether the rule of law is upheld, democratic representation is honored, and constitutional trust is protected are the constitutional metrics by which accountability achievements are evaluated. When individuals and organizations have faith that the procedures outlined in the Constitution are just, predictable, and based on sound logic, we say that they have constitutional trust. Despite the formal legality of a constitutional reform, confidence may be damaged if it is implemented by methods that are seen as exclusive or unilateral.

Controversies about responsibility have persisted in public discourse and arguments about governance following the repeal of Article 370. Aside from court decision, credible news reporting has shown that calls for restoration of statehood and special status remain, suggesting that constitutional contestation is far from over (Reuters, 2024). According to these new developments, the impact of constitutional rulings on democratic processes and public thinking should be considered alongside judicial finality when evaluating constitutional accountability.

## **5. CONCLUSION AND RECOMMENDATIONS**

### **Conclusion**

The authors of the study examined the constitutional, doctrinal, and moral implications of the repeal of Article 370 and the impact on India's federalism. The authors concluded that it would be more appropriate to identify the change to the Constitution as the result of a new approach being adopted toward the organisation of the federal structure of India by way of the judiciary's interpretation and the Court's application of its authority to the Constitution, rather than simply an exercise of legislative authority or a government decision to exclude a specific political entity. Historically, Article 370 was created as part of a federal Compact between India and the state of Jammu and Kashmir to allow for the effective governance of the two regions while also allowing for the long-term

integration of the two regions into the federation of India. This historical context is reflected in an analysis of the constitutional structure of asymmetrical constitutions, and so the removal of Article 370 represents a clear break from this historical model and raises concerns regarding the long-term viability of incongruent federal commitments made within India's constitutional structure.

The authors of the study found that the decision made by the Supreme Court to adjudicate the repeal of Article 370 was primarily based upon the wording of the Constitution, the procedural rules created by the Constitution, and the separation of powers created by the Constitution. The authors of the study have provided justification for the amendment of the Constitution by highlighting that Article 370 was, in their view, intended to be a temporary arrangement and that the Union Government of India possessed the power under the Constitution to achieve integration with Jammu and Kashmir using other mechanisms provided by the Constitution. The constitutional morality point of view suggests that Article 370 judgments raise timeless concerns around accountability, limitations on institutions, and justification of the actions taken. The importance of democratic representation, regional autonomy, and constitutional trust with respect to procedural legitimacy were identified as fundamental to maintaining constitutional morality. There is an inherent conflict between constitutional authority and constitutional legitimacy as exemplified by the episode of abrogation; this is particularly highlighted in instances of large-scale politically sensitive restructuring. The need for clear thinking and open-mindedness in relation to these conflicts in order to have faith in constitutional democracy is therefore vital. The conclusions drawn from the research are that Article 370's removal had some positive and some negative impacts on the Constitution. While Article 370 was an important component of the Constitution, removing it resulted in a shift of power from the states to the central government, as the powers previously exercised by the states were increasingly being assumed by the central government through its interpretation of the Constitution. The various ways that federal authority has changed due to this event is important from a doctrinal standpoint, as it shapes what type of issues will be brought to the courts in the future regarding federalism and autonomy. It also shows how courts interpret these changes in relation to autonomy. The change in the lines of separation between federal jurisdiction, federal diversity, and federal unity that arose as a result of removing Article 370 has fundamentally reshaped the character of India's federalism.

## **Recommendations**

1. Develop clear and accessible sources for constitutional interpretation and guidance that will help eliminate ambiguity regarding future constitutional questions relating to the parameters of asymmetric exercises of federal power and authority.
2. When establishing the principles governing centre versus state balances when considering substantial amendments to the Constitution, maintaining consistent doctrines is paramount. Courts should apply stronger justification when determining the sequencing of executive versus legislative streams.
3. There is a pressing need to systematically promote and make available open-access literature (through digital platforms) addressing issues of constitutional morality, as well as the emergence of federalism post-2019, so as to ensure enhanced and facilitated academic performance, doctrinal discussion, and broad public understanding.
4. Establishing structured dialogues regarding constitutional amendment processes in the setting of public and legislative reviews will foster greater public confidence in the Constitution, increase deliberative engagement within a democratic environment, and promote less divisiveness regarding federal restructuring activities.

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