

23.07.2026

To,
Hon'ble Thiru Justice V. Ramasubramanian,
Chairperson,
National Human Rights Commission,
Manav Adhikar Bhawan,
Block-C, GPO Complex,
INA, New Delhi –110 023

Email: hrd-nhrc@nic.in

Respected Sir,

Subject: Representation seeking intervention of the National Human Rights Commission through an open public hearing, and the summoning of affected petitioners and concerned officials, in respect of the alleged mass, discriminatory and arbitrary deletion of names from electoral rolls under the Special Intensive Revision (SIR) conducted by the Election Commission of India, disproportionately affecting Muslim, Bengali and other minority citizens.

Greetings!

This representation is from the Chennai/Bangalore based Forum for Electoral Integrity (FEI) formed as a civil society coalition in August, 2010 with Mr. MG Devasahayam, a former IAS officer as the convener. In its Network the Forum had several NGOs, CBOs and eminent personalities including former Chief Election Commissioners of India, former Chief Electoral Officers of Tamil Nadu and former senior civil servants, journalists, professionals and lawyers. The Forum was inaugurated on 09 October 2010 by CEC, Dr. SY Quraishi at a well attended public function at Chennai, jointly presided over by former CEC, N. Gopalaswami and veteran Parliamentarian Era Sezhiyan.

FEI launched the Electoral Integrity Initiative (EII) which is Civil Society in action to make Election Commission of India (ECI) stringently enforce constitutional mandates, existing laws and judicial pronouncements to effectively combat corruption and criminalisation in election, ensure ethical voting thereby providing a level playing field for honest and committed leadership to emerge.

In this context we are writing to express our grave concerns regarding the Special Intensive Revision of electoral rolls being conducted by the Election Commission of India and request the Commission's urgent intervention under Section 12(a) of the Protection of Human Rights Act, 1993.

The UN Special Rapporteurs (UNSRs) of the UN Human Rights Council, by a Joint communication dated 1 May, 2026 (Ref. AL IND 8/2026) addressed to the Government of India, formally raised many concerns regarding the SIR process. It is a communication by UNSR on Minority Issues along with the UNSR on promotion and protection of the right to freedom of opinion and expression and the UNSR on freedom of religion or belief, citing violations of human rights, particularly of the Muslim minorities in India due to the SIR process in India. It has further highlighted the SIR process in West Bengal, considering it as a matter of ‘particular concern’.

Reference:

https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=30984&utm_source=substack&utm_medium=email

DETAILS OF THE FACTS

1. On November 4, 2025 the Election Commission of India (ECI) announced a SIR process in 9 states including Chhattisgarh, Goa, Gujarat, Kerala, Madhya Pradesh, Rajasthan, Tamil Nadu, Uttar Pradesh and West Bengal, and 3 Union Territories, including Andaman and Nicobar, Lakshadweep and Puducherry spanning 321 districts and 1,843 Assembly Constituencies. This second phase, which was meant to last until 4 December 2025, follows a preliminary exercise conducted in Bihar between June and September 2025.
2. According to the ECI, the goal of the SIR process is to ensure that “the names of all eligible citizens are included in the electoral roll”, that “no ineligible voter is included in the electoral rolls”, and to be completely transparent in the process of adding or deleting electors in the electoral roll.
3. Across the 12 States and Union Territories, approximately 52 million names have allegedly been removed, with West Bengal particularly affected, where a total of 9.1 million names were reportedly deleted from the register. Affected individuals of the second phase report being wrongfully excluded despite having provided valid identification. Muslim voters were reportedly disproportionately impacted by the SIR process.
4. The ECI ordered a SIR of electoral rolls in Bihar in 2025, seeking to re-verify the eligibility of over 81 million electors within a compressed timeline of less than 100 days. Muslims—approximately 17% of the state's population—accounted for roughly one-third of the 4.7 million voters removed from the final electoral rolls, and the BJP-led alliance subsequently won 202 of 243 seats in the state assembly election.
5. On 1 August 2025, a draft electoral roll was published excluding approximately 6.5 million electors (around 8.3% of the electorate) despite many having submitted enumeration forms. As of 20 August 2025, only 60,010 excluded voters had been able to file appeals through the 'claims and objections' process. Independent analyses indicated that exclusion rates were markedly higher in districts with higher poverty levels, higher out-migration, and higher concentrations of Muslim populations, as well as in several opposition-held constituencies. Women reportedly constituted nearly 60%

of those excluded from the draft rolls, despite comprising 47.8% of the electorate, with the proportion exceeding 60% in 43 of Bihar's 243 assembly constituencies.

6. On 4 November 2025, the ECI extended the SIR to nine States (Chhattisgarh, Goa, Gujarat, Kerala, Madhya Pradesh, Rajasthan, Tamil Nadu, Uttar Pradesh and West Bengal) and three Union Territories (Andaman and Nicobar, Lakshadweep, and Puducherry), covering 321 districts and 1,843 Assembly Constituencies. Across these jurisdictions, approximately 52 million names are reported to have been removed from electoral rolls, of which 9.1 million were in West Bengal alone.
7. Disproportionate impact on minorities is taking place due to the SIR. For instance, in West Bengal, Muslim voters are reported to have accounted for 34% of total deletions, against a 27% share of the State's population; nearly two-thirds of those deleted belong to the minority community. It is reported that approximately 95% of deleted voters were Muslim, even though Muslims comprise only about 25% of that constituency's electorate. Affected persons reportedly include men, women, and elderly Indian nationals holding valid identity documents, whose names were nonetheless deleted, reportedly on the pretext of minor and administratively common spelling inconsistencies.
8. Indian electoral law permits any citizen to file a 'Form 7' application objecting to another voter's inclusion on the rolls, a mechanism intended for individual corrections. Reports indicate that, in several States, this mechanism was used for organised, large-scale campaigns targeting Muslim residents: in Gujarat's Somnath constituency, over 15,000 Form 7 applications are reported to have been filed by just 269 individuals (each submitting 50 or more forms), including the local BJP women's wing president.
9. In Madhya Pradesh's Indore, over 11,000 such applications were filed, several traced to BJP-affiliated individuals; and in Uttar Pradesh's Shamli district, 544 pre-printed Form 7 applications targeting Muslim residents of a single village were traced to one applicant. In Assam, where a comparable revision was conducted, the Chief Minister is reported to have publicly directed party workers to file such applications against Bengali-speaking Muslim residents, stating in January 2026 that a specified number of such residents 'will get deleted' and that his 'job is to make them suffer', and subsequently confirming that party members' complaints had led to names being struck off; of 1.29 million Form 7 applications reportedly filed in Assam, 1.06 million were accepted.
10. We submit that such statements by holders of high public office, made in the context of an ongoing administrative exercise, are liable to conflate lawful Indian Muslim citizens with foreign nationals and to constitute an official endorsement of discriminatory treatment of a religious minority. It is further reported that, before Parliament, the Union Home Minister described the exercise in terms of a 'Detect, Delete and Deport' formula, and separately characterised it as a mechanism to 'purify' electoral rolls of 'infiltrators'.
11. The use of an opaque AI-driven system flagged irregularities on voter data raising concerns about transparency errors and potential bias. The exercise reportedly employed an AI-driven system to flag 'irregularities' in voter data, without adequate transparency regarding its methodology, error rates, or safeguards against bias raising

serious due-process concerns given the scale and finality of the consequences (loss of the right to vote) that flow from such flagging.

12. The Judiciary on the other hand, has also declined to intervene. The Supreme Court of India declined to stay the SIR process (order dated 6 April 2026), though it earlier directed the ECI, in the Bihar exercise, to restore machine-readable draft rolls and to accept Aadhaar as valid proof of identity for inclusion. Subsequently, on 16 April 2026, invoking its powers under Article 142 of the Constitution, the Supreme Court permitted West Bengal voters removed from the rolls to regain voting rights if their appeals were allowed by appellate tribunals before 21 and 27 April 2026, ahead of the two-phase Assembly elections held on 23 and 29 April 2026 -a compressed adjudicatory timetable applied to an exercise involving over 3.4 million appeals, which the Petitioner submits made it structurally impossible for tribunals to conduct fair and effective review of each case.
13. In addition to it, public statements by Government functionaries have publicly characterised the deletion of voter names as targeting 'illegal Bangladeshi immigrants', and have described the SIR as a mechanism to 'purify' electoral rolls of 'infiltrators'. We further note reports that the Assam Chief Minister has publicly acknowledged the expulsion of over 2,450 Bengali-speaking Muslims since May 2025, and has stated that his government could expel between 10,000 and 50,000 more 'foreigners' in 2026 if returned to power; and that preparations for the third phase of the SIR, covering 22 further States and Union Territories are under way.
14. Such statements, made by holders of high public office in the context of an ongoing administrative exercise directly affecting the electorate, are liable to conflate lawful Indian Muslim citizens with foreign nationals, and risk normalising discriminatory treatment of a religious minority in the conduct of a State function.
15. In light of these events in India, the UNSR Joint communication mentioned though they are not prejudging the accuracy of these allegations, they continue to express concern about the fact that the allegations may amount to serious violations of multiple human rights obligations.
16. They also expressed concern regarding the manner in which the SIR process has been conducted resulting in removal of millions of voters names from electoral rolls, primarily affecting a great number of muslims and persons of Bengali descent and other minorities as well. The communication explicitly expressed concern about discriminatory rhetorics by politicians and senior public figures of the Government that would “amount to potential incitement to discrimination within the meaning of article 20(2) of the International Covenant on Civil and Political Rights (ICCPR), ratified by India on 10 April 1979”¹ further stating that “We are concerned that the rhetoric used by authorities may serve to construct Muslim citizens as presumptively foreign, criminal and undeserving of civic rights, without any individualized determination of their legal status, in a manner incompatible with the non-discrimination obligations of articles 2 and 26 of the ICCPR”

¹ This article prohibits any advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence

17. The communication also mentioned that “religions, beliefs, or their followers must not be instrumentalized to incite hatred and violence, including for electoral purposes or political gains, and has specifically noted that public acts of intolerance are more common in times of political tension, such as elections, and must be condemned by States”
18. The Special Rapporteurs noted that the removal of an entire religious community through the SIR process risks constituting “an official endorsement of discriminatory attitudes towards Muslim citizens, and may amount to instrumentalization of state administrative machinery for the purpose of political targeting of a religious minority,” violating international standards under International Convention on the Elimination of All Forms of Racial Discrimination, 1968.
19. Regarding the judiciary as well, the communication mentions that “The short timeframe and sheer scale of the appeals meant to be resolved before the deadlines set by the Court on 21 and 27 April 2026 appear to have led to the exclusion of millions of eligible citizens from the elections in West Bengal.”
20. Therefore, we respectfully submit that being denied the ability to participate in the electoral process i.e., the right to vote and to be represented, is in itself a violation of human rights as enshrined in the Universal Declaration of Human Rights and ICCPR and accordingly falls within the Hon’ble Commission’s mandate.
21. It is concerning that despite these violations having been extensively documented since the Bihar pilot mid-2025, this Commission did not use its powers under Section 12 of the PHRA to intervene in the matter.
22. Therefore, given the scale of the exclusions, their disproportionate impact on identifiable minorities, the reported public statements of senior functionaries, and the imminent risk of nationwide replication of the SIR exercise together warrant this Hon'ble Commission's direct and urgent exercise of its powers.

Appeal

We request the Commission to:

- (a) take cognizance of and register the present representation as a formal complaint under Section 12(a)(i), 12(a)(ii), 12(b) read with section 12(d) of the Protection of Human Rights Act, 1993;
- (b) call for detailed reports from the relevant authorities such as Election Commission of India, the Union Ministry of Home Affairs, and the concerned State Election Machinery of Bihar and West Bengal, under Section 13 of the PHR Act, disclosing (i) the exact numbers of names deleted, State- and constituency-wise, with reasons for deletion; (ii) the number of objections and appeals filed and their outcomes; and (iii) data disaggregated by

religion, caste/community and gender of persons excluded and of persons subsequently declared ineligible;

(c) Immediately constitute and conduct **an open, online public hearing** into the matter by summoning the petitioners, so that the allegations herein may be examined transparently and on record- even before issuance of notice to the Election Commission of India so that this Hon'ble Full Commission may have the benefit of hearing our presentations prior to issuing of such notice;

(d) Thereafter summon responsible officials of the Election Commission of India and the concerned Ministries to appear before the Commission and respond to the specific allegations set out herein, including in relation to the design, transparency and safeguards of the AI-driven flagging system used in the SIR exercise;

(e) recommend, as an interim measure pending completion of the inquiry, that further extension or replication of the SIR exercise to additional States/Union Territories be held in abeyance, and that adequate time, transparent procedures and effective remedial mechanisms be put in place for any 'claims and objections' process already underway;

(f) recommend such accountability measures in respect of public statements by functionaries that the Commission finds to have been discriminatory or to have incited hostility against a religious or linguistic minority; and

(g) pass such other and further orders/recommendations as this Hon'ble Commission may deem fit and proper in the interest of justice.

(h)) In view of the recommendations been made by the Office of High Commission, this Hon'ble Commission should also provide them an opportunity of presenting their legal positions to the Commission in the light of international human rights law by way of an online hearing.

We would be grateful for an early and favourable response, given the urgency of the matter and the risk of further disenfranchisement if the SIR exercise is replicated in additional States without independent scrutiny.

Yours Faithfully,

M G Devasahayam IAS (Retd), Convener, Forum for Electoral Integrity

Jawhar Sircar IAS (Retd), former Member, Rajya Sabha.

Mehmood Pracha, Advocate, Supreme Court, Delhi

Madhav Deshpande, Software Specialist.

Venkatesh Nayak, RTI Specialist.

Dr. Sant Prakash, Professor, Delhi University.

Ms Tara Rao, Social Activist.

ANNEXURE-I

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