



* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

Judgment Reserved on: 05.08.2026

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Judgment Delivered on: 02.09.2026

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CNR No. DLHC010893532025

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**LPA 697/2025, CM APPL. 71335/2025, CM APPL. 71336/2025,
CM APPL. 79570/2025, CM APPL. 12729/2026, CM APPL.
43412/2026 & CM APPL. 50005/2026**

ALL INDIA CARROM FEDERATION

.....Appellant

Through:

versus

UNION OF INDIA & ANR.

.....Respondents

Through:

Mr. Udit Dedhiya, SPC along with Mr. Rajat Mohan Dwivedi, G.P., Mr. Vishal Sharma, Ms. Apurva Sachdev, Mr. Preyansh Gupta, Mr. Shivam Dubey & Mr. Yash Singh, Advocates for R-1/UoI. Mr. Aseem Mehrotra & Ms. Deeksha Mehrotra, Advocates for R-2, 3 & 4.

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CNR No. DLHC010976002025

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**LPA 739/2025, CM APPL. 76777/2025, CM APPL. 76778/2025,
CM APPL. 76779/2025 & CM APPL. 42824/2026**

MAHARASHTRA CARROM ASSOCIATIONAppellant

Through:

Mr. Aseem Mehrotra & Ms. Deeksha Mehrotra, Advocates.

versus

UNION OF INDIA & ORS.

.....Respondents

Through:

Mr. Udit Dedhiya, SPC along with Mr. Rajat Mohan Dwivedi, G.P., Mr. Bipul Kumar, G.P., Mr. Vishal Sharma, Ms. Apurva Sachdev, Mr. Preyansh Gupta, Mr. Shivam Dubey & Mr. Yash Singh, Advocates for R-1/UoI.



CNR No. DLHC010980792025
+ LPA 744/2025, CM APPL. 77079/2025, CM APPL. 77080/2025 & CM APPL. 77081/2025
UNION TERRITORY PONDICHERRY CARROM ASSOCIATIONAppellant

Through: Mr. Aseem Mehrotra & Ms. Deeksha Mehrotra, Advocates.

versus

UNION OF INDIA & ANR.Respondents

Through: Mr. Ankit Raj, SPC with Mr. Bipul Kumar, G.P. & Mr. Digvijay Singh, Advocate for Union of India.

CORAM:
HON'BLE THE CHIEF JUSTICE
HON'BLE MR. JUSTICE TEJAS KARIA

JUDGMENT

TEJAS KARIA, J

1. The present *intra-court* Appeals assail the common order dated 29.10.2025 (“**Impugned Order**”) passed in the writ petitions filed before learned Single Judge of this Court by Maharashtra Carrom Association (“**MCA**”) bearing W.P. (C) No. 12805/2023 and W.P. (C) No. 8665/2025, by Union Territory Pondicherry Carrom Association (“**PCA**”) bearing W.P. (C) No. 17077/2024 and by one Ravi Kumar bearing W.P. (C) No. 3099/2025 (“**Writ Petitions**”).

2. The Writ Petitions raised common issues pertaining to the election held on 27.08.2023 (“**2023-Election**”) of the All India Carrom Federation (“**AICF**”), a society registered under the Societies Registration Act, 1860, which claims to be the National Sporting Federation (“**NSF**”) for the sport of



Carrom and has been a member of the International Carrom Federation (“ICF”) since 1988.

3. W.P. (C) No. 17077/2024 filed by the PCA prayed for a) quashing 2023-Election result dated 27.08.2023; b) a direction to the UOI not to approve 2023-Election; c) a direction to AICF not to use the title ‘India’ or ‘Indian’ on the basis of letters dated 05.07.2011 and 16.10.2018 whereby UOI directed all NSFs which are not recognised by the Ministry of Youth Affairs and Sports (“**Ministry**”) not to use the title ‘India’ or ‘Indian’ in all events (National / International) and also not to function or control and regulate the game of Carrom in the country in violation of clause 3.6 (3) of National Sports Development Code of India (NSDCI), 2011 (“**Sports Code**”) till Government recognition is granted to AICF; and d) directions for holding of fresh elections of AICF on the basis of electoral college of 2012, which is compliant with the Sports Code, under the supervision of a Retired Judge of this Court as the Returning Officer.

4. The reliefs sought in W.P. (C) No. 17077/2024 filed by PCA and W.P. (C) No. 8665/2025 filed by MCA were identical, save and except that W.P. (C) No. 8665/2025 additionally sought a declaration that Respondent No. 3 therein, namely, Vidarbha Carrom Association, could not form part of AICF on account of violation of Clause 3.10 of the Sports Code.

5. The learned Single Judge, *vide* the Impugned Order, disposed of the Writ Petitions by observing that: (i) in the absence of renewal of AICF’s recognition by the UOI, AICF shall change its name so as to delete the word ‘India’ from its nomenclature; (ii) whenever any team is sent by AICF, such team shall be sent only under its changed/amended name, and AICF shall specify that the team is from India and shall not project such team as the



Indian Team recognised by the Government of India; and (iii) AICF shall not use the expression ‘*India*’ or ‘*Indian*’ in any manner, whether in its name, logo, or in competitions conducted by it.

6. The learned Single Judge, *vide* the Impugned Order, further granted liberty to AICF to use the expression ‘*Team from India*’ to indicate that the representation was from India and to make a representation to the UOI for recognition as an NSF, having regard to the fact that AICF had earlier been recognised by the UOI as an NSF. The learned Single Judge further directed that, in the event such representation was made by AICF, the same would be duly considered by the UOI; that AICF would comply with all directions issued by the UOI in relation to the grant of recognition; and that, if the UOI was satisfied with the compliances made by AICF, it could proceed to grant recognition to AICF in accordance with law and after following due procedure. Insofar as the 2023-Election was concerned, the learned Single Judge did not examine the said issue, in view of the stand taken by the UOI that AICF was not a recognised NSF.

FACTUAL MATRIX

7. In 2011, the Ministry framed the Sports Code, consolidating the guidelines on recognition of NSFs, eligibility conditions, affiliation with the concerned International Federation, representation of eminent sportspersons, the One State One Unit principle, suspension and withdrawal of recognition, and the Model Election Guidelines for NSFs (“**Guidelines**”).

8. After implementation of the Sports Code, AICF held its first election on 22.07.2012 (“**2012-Election**”). The 2012-Election was challenged in W.P. (C) No. 110/2013, titled ***V.D. Narayan v. Union of India***, on the ground of violation of Clause 3.10 of the Sports Code. In those proceedings, the UOI



filed an affidavit dated 06.07.2013 clarifying that the 2011 Guidelines applied only to NSFs seeking recognition after their issuance and not retrospectively to NSFs already existing and recognised. Thereafter, the writ petition was withdrawn.

9. On 29.11.2015, AICF held elections at Guwahati (“**2015-Election**”). The UOI, *vide* letter dated 04.02.2016, declared the 2015-Election invalid for violation of the Guidelines and directed fresh elections. AICF challenged the said letter in W.P. (C) No. 3314/2016, titled ***All India Carrom Federation v. Union of India***. The learned Single Judge, *vide* judgment dated 06.08.2018, upheld the direction to conduct fresh elections.

10. On 30.10.2018, AICF notified the election programme, pursuant to which MCA and other State associations filed nominations for the AICF election scheduled on 18.11.2018 (“**2018-Election**”). The electoral college was prepared on 04.11.2018, listing 53 candidates. The Returning Officer thereafter prepared Form-3 on 09.11.2018 and Form-4 containing the list of validly nominated candidates on 10.11.2018.

11. Thereafter, thirteen State carrom associations filed C.S. (OS) No. 576/2018, titled ***Haryana Carrom Association & Anr. v. All India Carrom Federation***, before this Court on 14.11.2018, seeking a declaration that the electoral college published by AICF on 04.11.2018 and the Returning Officer’s order dated 10.11.2018, along with the list of valid nominations, were illegal, null and void; directions to include the plaintiffs’ nominees in the electoral college; and injunctions for constitution of a valid electoral college, conduct of elections in accordance with the Sports Code, AICF Rules and Government notifications, and restraint against certain defendants from contesting the 2018-Election.



12. The Ministry, *vide* letter dated 07.03.2019, granted AICF provisional recognition until 31.03.2019 or the decision in C.S. (OS) No. 576/2018, whichever was earlier. By letter dated 17.01.2020, the Ministry accepted the 2018-Election, took the elected office bearers and Managing Committee on record for 2018-22, and renewed AICF's recognition with immediate effect, subject to the outcome of C.S. (OS) No. 576/2018.

13. By letter dated 07.12.2020, the Ministry raised violation of Clause 3.10 of the Sports Code, noting that AICF had two units in Maharashtra, namely MCA and Vidarbha Carrom Association, both of whose members had voting rights and were elected, contrary to the One State One Unit principle.

14. AICF replied on 22.12.2020, relying upon the Ministry's stand in W.P. (C) No. 110/2013 concerning Clause 3.10 of the Sports Code and the One State One Unit principle in relation to the 2012-Election.

15. This Court, *vide* judgment dated 06.04.2023 in ***Haryana Carrom Federation Association*** (*supra*), declared the 2018-Election illegal and directed AICF to conduct fresh elections within six months under the Ministry's supervision.

16. AICF, *vide* communications dated 11.04.2023, 30.04.2023 and 19.05.2023, informed the Ministry of the judgment dated 06.04.2023 in ***Haryana Carrom Federation Association*** (*supra*) and sought compliance therewith.

17. For the 2023-Election, AICF notified the election notice and programme on 01.08.2023. PCA, by e-mail dated 04.08.2023, stated that it had not received an invitation to submit nomination forms.

18. MCA, by e-mail dated 11.08.2023, recommended its representatives. On 15.08.2023, it requested AICF and the Returning Officer to correct the



voter list by adding Ajit Sawant, who intended to contest the 2023-Election, and sent reminders on 18.08.2023, 20.08.2023 and 24.08.2023.

19. AICF notified the electoral college for the 2023-Election on 22.08.2023. On the same date, several associations informed AICF that they had not received invitations to submit nomination forms.

20. Meanwhile, AICF, by e-mail dated 17.08.2023, requested the UOI to nominate a Ministry observer for the Annual General Meeting (“AGM”) and the 2023-Election under Clause 3.13 of the Sports Code. At the AGM held on 27.08.2023, the Returning Officer, Mr. Justice S.S. Chauhan, former Judge of the Allahabad High Court, declared the 2023-Election results unanimous. The President, ICF attended through video conferencing.

21. AICF, *vide* letter dated 30.08.2023, submitted the Election Officer’s Report and the 2023-Election results to the Ministry.

22. On 04.09.2023, PCA represented the UOI that the 2023-Election involved inclusion of over 20 ineligible persons in the electoral college and the election of 7 to 8 members contrary to the Sports Code. PCA requested the Ministry not to approve or take the 2023-Election on record, to declare it null and void, and to direct fresh elections.

23. The UOI, *vide* letter dated 15.01.2024, sought clarifications from AICF regarding, *inter alia*, Government employees elected at the AGM, their past elected posts, sportspersons in the Executive Committee, and the tenure of AICF President, Shri Rakibul Hussain.

24. AICF replied on 06.02.2024 and furnished the information sought. Subsequently, in response to PCA’s RTI application, the Ministry, by letter dated 17.12.2024, stated that no federation had been recognised for Carrom and that the 2023-Election was not in accordance with the Sports Code.



25. On 29.10.2025, the learned Single Judge passed the Impugned Order, against which AICF, MCA and PCA filed the present Appeals.

26. Pursuant to this Court's orders dated 17.11.2025 and 30.01.2026 directing the Ministry to decide on the Returning Officer's report dated 30.08.2023, the Ministry, by letter dated 06.02.2026, held that the 2023-Election was not in accordance with the Sports Code, the Guidelines and other extant Ministry guidelines; accordingly, it could not be taken on record and annual recognition based thereon could not be considered.

27. AICF, by letter dated 09.02.2026, objected to the Ministry's letter dated 06.02.2026 and challenged it in W.P. (C) No. 3513/2026. By order dated 11.05.2026, the learned Single Judge directed that the Ministry's letter be treated as a show-cause notice and AICF's reply as its response and directed the UOI to pass a fresh order on AICF's recognition within eight weeks.

28. Pursuant thereto, the Ministry passed order dated 10.07.2026 holding that the 2023-Election could not be taken on record, *inter alia*, because two associations from Maharashtra, namely MCA and Vidarbha Carrom Association, were included in the electoral college in violation of Clause 3.10 of the Sports Code.

29. AICF has filed W.P. (C) No. 10610/2026 challenging the order dated 10.07.2026. The learned Single Judge issued notice in the said writ petition on 30.07.2026 and the next date is on 14.09.2026.

SUBMISSIONS ON BEHALF OF AICF

30. The following submissions were made on behalf of AICF:

30.1. AICF has represented India in nearly fifty international championships and has consistently selected and fielded Indian teams. Its legal identity, international affiliation, event records,



contractual rights, registrations, goodwill, bank accounts and consequential rights are inseparably linked to its existing name. A compulsory change of name would jeopardise its international affiliation and seriously prejudice Indian sportspersons. No statutory provision empowers the Ministry to compel AICF to delete the word '*India*' from its long-standing name.

- 30.2. Annexure III of the Sports Code permits suspension or withdrawal of recognition only after following the prescribed procedure and affording the concerned NSF an opportunity of hearing. No such proceedings have been initiated or concluded against AICF. Absent any order of suspension or withdrawal, AICF continues to function as the NSF for Carrom. The Ministry's affidavit dated 30.01.2025 in W.P. (C) No. 17077/2024 also does not state otherwise, and the learned Single Judge proceeded principally on oral submissions and an RTI response dated 17.12.2024, neither supported by pleadings on oath.
- 30.3. In ***Union of India v. Taekwondo Federation of India & Anr.***, LPA 5/2026, a Division Bench of this Court held that non-renewal of annual recognition does not result in automatic withdrawal or de-recognition, and that suspension or withdrawal can occur only in accordance with Annexure III of the Sports Code after due process.
- 30.4. Clause 3 of Annexure II of the Sports Code requires an organisation seeking recognition to be already registered, have affiliated State associations across India, conducted National Championships for the prescribed period, and to be affiliated with



the concerned International Federation. International affiliation is also an independent requirement under Clause 3.15 and is not dependent on Government recognition. Recognition therefore acknowledges an existing NSF; it does not create the federation or confer its name. The Ministry consequently lacks statutory authority to direct deletion of the word '*India*' from AICF's name, which predates recognition by decades.

- 30.5. The 2023-Election was held unanimously with participation of all members, under the supervision of a Returning Officer who was a former High Court Judge and was also observed electronically by ICF.
- 30.6. The Ministry failed to comply with the directions in ***Haryana Carrom Federation Association*** (*supra*). Although the Returning Officer's report was submitted on 30.08.2023, the Ministry remained silent for nearly 889 days and issued its communication only on 06.02.2026 pursuant to this Court's orders dated 17.11.2025 and 30.01.2026 in LPA 697/2025. While Clause 3.10 of the Sports Code was initially relied upon to decline renewal of recognition, the communication dated 06.02.2026 introduced six new allegations.
- 30.7. The Ministry's order dated 10.07.2026 substantially departed from its letter dated 06.02.2026 and ignored its affidavit dated 06.07.2013 in W.P. (C) No. 110/2013, pursuant to which the 2012-Election was accepted despite two units each representing Maharashtra/Vidarbha and Andhra/Hyderabad. After the said affidavit was filed, W.P. (C) No. 110/2013 was withdrawn.



- 30.8. *Vide* order dated 11.05.2026 in W.P. (C) No. 3513/2026, the learned Single Judge directed that the communication dated 06.02.2026 be treated only as a show-cause notice, in view of violation of the principles of natural justice.
- 30.9. The aforesaid sequence demonstrates arbitrariness and absence of a fair decision-making process, with the Ministry taking inconsistent stands at different stages of the same dispute.
- 30.10. After the 2023-Election, AICF conducted nine National Championships involving approximately 2,705 sportspersons from 25-26 States/UTs and major Government institutions, and Indian teams selected by AICF achieved overall medal success in major international championships.
- 30.11. Thousands of players, particularly from economically weaker sections, depend on such championships for sports-quota appointments, scholarships, promotions, cash awards and other Government benefits. Owing to the Impugned Order, only one National Championship could be conducted in 2025-26 and certificates remain unissued, seriously prejudicing numerous sportspersons.
- 30.12. The directions in the Impugned Order are contrary to the Sports Code, inconsistent with the autonomy of sports bodies, and incapable of implementation in view of AICF's international affiliation.
- 30.13. Accordingly, LPA 697 / 2025 deserves to be allowed in the interests of certainty in sports administration and the welfare of Indian sportspersons.



SUBMISSIONS ON BEHALF OF MCA AND PCA:

31. The following submissions were made on behalf of MCA and PCA:

- 31.1. LPA 697 / 2025 filed by AICF is not maintainable, as AICF has challenged the Impugned Order only in W.P. (C) No. 17077/2024; consequently, the order passed in the other writ petitions has attained finality. In any event, AICF's case that it continues to be an NSF, retains recognition, and complies with the Sports Code is misconceived. AICF was granted annual recognition from 2010 to 2015 and, thereafter, no recognition was granted in 2016. Recognition granted on 29.09.2017 pursuant to the order dated 25.08.2017 in Review Petition No. 325/2017 in LPA No. 407/2017 was stayed by the Supreme Court in SLP (C) No. 35735/2017. Thereafter, AICF received only provisional annual recognition on 07.03.2019 and 17.01.2020, subject to the final decision in C.S. (OS) No. 576/2018. The UOI notified AICF of violation of the One State One Unit principle on 07.12.2020, and no annual recognition has been granted thereafter.
- 31.2. As regards the 2023-Election, the UOI, by order dated 06.02.2026, held that the said election was unacceptable. AICF challenged that order in W.P. (C) No. 3513/2026, which was disposed of on 11.05.2026 with a direction to the UOI to consider AICF's reply dated 09.02.2026 on recognition. The UOI thereafter passed a fresh order dated 10.07.2026 assigning reasons. AICF has challenged that order in W.P. (C) No. 10610/2026, which is pending and is not the subject of the present Appeals. Further, AICF itself issued a letter dated 04.11.2025 to



all State associations stating that its name stood changed to Carrom Federation and that no State association should hold any event.

- 31.3. AICF's last three elections, namely the 2015-Election, 2018-Election and 2023-Election, were all contrary to the Sports Code. The UOI declined to accept the 2015-Election on account of serious illegalities, and that decision was upheld by this Court in ***All India Carrom Federation v. Union of India***, 2018 SCC OnLine Del 10337.
- 31.4. Despite the judgment in ***Haryana Carrom Federation Association*** (*supra*), AICF altered the electoral college for the 2023-Election and excluded the beneficiary State associations despite e-mails to AICF and the Returning Officer. Consequently, the UOI declined to accept the 2023-Election.
- 31.5. The 2023-Election suffered from material violations of age and tenure requirements, Clause 3.10 of Annexure II to the Sports Code incorporating the One State One Unit principle, and ***Rahul Mehra v. Union of India***, 2022 SCC OnLine Del 2438, which mandates fair, transparent and Code-compliant NSF elections, including 25% representation of eminent sportspersons. Recognition cannot be granted to a non-compliant NSF.
- 31.6. Given that AICF's last three elections were unlawful, this Court may appoint a retired High Court Judge as Administrator, assisted by a senior Ministry official, to conduct fresh elections on the undisputed 2015 electoral college and amend AICF's Rules in conformity with the National Sports Governance Act, 2025



(“NSG Act”) and the NSG (National Sports Bodies) Rules, 2026 (“NSG Rules”).

- 31.7. Before finalising the electoral college, the Administrator may decide the One State One Unit issue by merging Vidarbha Carrom Association with MCA. A similar merger of Hockey Vidarbha with Hockey Maharashtra was upheld by the Bombay High Court in *Vidarbha Hockey Association v. Hockey India*, W.P. No. 2052/2020, and the SLP was dismissed on 26.05.2025.
- 31.8. Fresh AICF elections may be conducted under the amended Constitution and in compliance with the NSG Act and NSG Rules. AICF may bear 50% of the Administrator’s expenses, with administrative assistance from one AICF representative and one representative of MCA/PCA or their nominee.
- 31.9. As to selection trials for Nationals and the World Cup, AICF has produced no material showing that Italy was awarded the World Cup or identifying the city, venue, accommodation or other arrangements. In the absence of such particulars, players may face financial and logistical risk. It is also submitted that Shri V.D. Narayan is Secretary General of ICF, and 71 players have e-mailed objections to ICF with copies to the UOI.
- 31.10. Without prejudice, if a team is to be sent, the Administrator and Ministry official may hold selection trials by inviting all State associations in the 2015 electoral college and those presently on AICF’s rolls. No eligible player should be excluded due to alleged illegal removal of a State association. Entries may be forwarded by AICF’s Executive Committee; players shall bear participation,



airfare and visa costs. No AICF official shall accompany the team at federation expense. MCA is willing to bear 50% of trial expenses, with the balance by AICF.

- 31.11. Administrators have been appointed by the Court in the past in several sports, including football, basketball, judo and lawn tennis. Reliance is placed on ***Pondicherry Basketball Assn. v. Union of India***, 2023 SCC OnLine Del 2495, and ***All India Tennis Assn. v. Somdev Kishore Devvarman***, 2026 SCC OnLine Del 4824; in ***Pondicherry Basketball Assn. (supra)***, writ petitions challenging elections and results were held maintainable.
- 31.12. Since MCA's and PCA's reliefs were not fully adjudicated, the Appeals may be brought to a quietus by appointing an Administrator, thereby satisfying the prayers in W.P. (C) Nos. 17077/2024 and 8665/2025. Cont. Case (C) No. 1297/2023 and W.P. (C) No. 10610/2026 may also be disposed of given that AICF had agreed before this Court to such appointment.

SUBMISSIONS ON BEHALF OF THE UOI

32. The following submissions were made on behalf of UOI:

- 32.1. One of the principal grounds raised by AICF in LPA 697/2025 is the Ministry's alleged failure to act on the election report dated 30.08.2023. However, pursuant to this Court's orders dated 17.11.2025 and 30.01.2026, the Ministry issued letter dated 06.02.2026, which AICF challenged in W.P. (C) No. 3513/2026. In compliance with the order dated 11.05.2026 passed therein, the Ministry reconsidered the 2023-Election after considering AICF's objections dated 09.02.2026 and passed a detailed order



dated 10.07.2026. Accordingly, the objection regarding non-consideration of the 2023-Election is without merit and, to that extent, LPA 697/2025 has become infructuous.

32.2. The 2023-Election is inconsistent with the Sports Code and the extant Ministry guidelines, *inter alia*, on the following grounds:

- a. The inclusion of two State associations from Maharashtra in the electoral college for the 2023-Election violated Clause 3.10 of the Sports Code.
- b. Clause 3.20 of the Sports Code mandatorily requires 25% representation of sportspersons of outstanding merit on an NSF's executive board. AICF's Constitution contains no corresponding provision.
- c. The Sports Code permits an individual to hold the office of President for a maximum of twelve years, with or without break. Shri Rakibul Hussain, President of AICF, had exceeded the said limit as on 17.07.2025.

32.3. AICF has already challenged the Ministry's order dated 10.07.2026 in W.P. (C) No. 10610/2026, which remains pending before this Court. In the absence of any interim order therein and having regard to the material discrepancies in the 2023-Election, the Ministry cannot presently take the said election on record or renew AICF's recognition.

32.4. Under Clause 8.2 and Annexure XV of the Sports Code, every NSF must obtain annual recognition. Annexure XV provides that a federation failing to comply with the requirements for annual renewal ceases to be an NSF. Upon submission of election details,



the Ministry is required to examine the results and thereafter consider renewal of recognition.

- 32.5. In ***Taekwondo Federation*** (*supra*), this Court, *vide* order dated 06.01.2026, held that an NSF must be afforded an opportunity to present its defence before recognition is withdrawn. In the present case, AICF's objections dated 09.02.2026 were duly considered before the Ministry passed order dated 10.07.2026.
- 32.6. During the pendency of these proceedings, the NSG Act was partially notified and brought into force with effect from 01.01.2026. Section 4 thereof prescribes mandatory compliance requirements for every NSF, including constitution of an Athletes Committee and Ethics Committee, inclusion of sportspersons on the executive board, and compliance with age, tenure and board-size limits.
- 32.7. The NSG Rules were notified on 12.01.2026. Rule 18 mandates every NSF to amend its bye-laws in conformity with the NSG Act within six months.
- 32.8. In view of the prevailing factual and legal position, even if AICF succeeds in W.P. (C) No. 10610/2026, it would remain non-compliant with the NSG Act. Until AICF brings itself into conformity with the NSG Act and applies afresh for recognition, it cannot be treated as an NSF.
- 32.9. Clause 3.6(2) of the Sports Code provides that an NSF failing to comply with applicable Government guidelines shall not be permitted to use the word '*India*' in its name. The Ministry's letter dated 16.10.2018 further clarifies that only recognised



NSFs may use the expressions ‘*India*’ or ‘*Indian*’; bodies whose recognition has been suspended or withdrawn, or which fail to complete renewal formalities within six months of expiry of recognition, lose the right to use those expressions.

- 32.10. The Emblems and Names (Prevention of Improper Use) Act, 1950 also prohibits use of the word ‘*India*’ in the name of any entity without prior Government approval, where such use may suggest patronage of the Government of India.
- 32.11. As regards AICF’s grievance concerning participation in the 9th World Carrom Championship, 2026, there is no restriction on AICF sending athletes for domestic or international tournaments. However, since AICF is not presently recognised as an NSF by the Ministry, the restrictions contained in the Ministry’s letter dated 16.10.2018 regarding use of the expressions ‘*India*’ or ‘*Indian*’ apply to it.
- 32.12. At this stage, the Ministry is not in a position to verify the *bona fides* of ICF, which is not affiliated with any recognised international body such as the Indian Olympic Association or the Olympic Council of Asia. Accordingly, the Ministry cannot provide funds to AICF or to athletes for participation, and winners may not be eligible for employment under sports quota or other benefits available in Ministry-recognised competitions.
- 32.13. Since AICF is not presently recognised, the Ministry has no regulatory control or authority over it. It is therefore for AICF to bring itself in conformity with the NSG Act, 2025, without any role of the Ministry in that process.



32.14. Once AICF aligns itself with the NSG Act, 2025, it may apply afresh for recognition, and such application shall be considered on its own merits.

32.15. Since the Ministry neither recognises nor exercises regulatory control over AICF, it cannot bear costs associated with its functioning or depute any officer to oversee its administration. If this Court appoints an Administrator, the attendant costs must be borne by AICF or other persons interested in its functioning.

ANALYSIS AND FINDINGS

33. We have heard learned counsel for AICF, the UOI, MCA and PCA, and have perused the material on record.

34. The principal issue arising in these Appeals is whether, in absence of any order suspending or withdrawing AICF's recognition under the Sports Code, and in the absence of any statutory provision empowering the Ministry to alter the name of an existing sports federation, the UOI/Ministry could direct AICF to remove the words '*India*' or '*Indian*' from its name.

35. AICF contended that the Ministry has passed no order suspending or withdrawing its recognition as an NSF under the Sports Code. The Ministry's affidavit dated 30.01.2025 in W.P. (C) No. 17077/2024 also does not state that AICF's recognition has been suspended or withdrawn. AICF submitted that the learned Single Judge relied on oral submissions advanced on behalf of the Ministry, without any documentary material on record evidencing such suspension or withdrawal. AICF further relied upon Annexure III of the Sports Code to contend that recognition of an NSF can be suspended or withdrawn only after following the prescribed procedure and affording the concerned NSF an opportunity of hearing.



36. The Impugned Order proceeded on the basis that AICF's recognition had not been renewed by the UOI and that, in the absence of such renewal, AICF could not be regarded as an NSF and the issue of suspension or withdrawal of AICF's recognition in accordance with the Sports Code was not discussed therein.

37. The Impugned Order further directed AICF, being a body earlier recognised by the UOI/Ministry as an NSF, to submit a representation for recognition as an NSF. It further directed that, if such representation was made, the UOI would consider it in accordance with law and that AICF would comply with all directions issued by the UOI regarding recognition and that, upon being satisfied with such compliance, the UOI could grant recognition after following due procedure.

38. The Impugned Order also directed that, until AICF was recognised by the Ministry as an NSF, it shall not use the expressions '*India*' or '*Indian*' in any manner, whether in its name, logo or competitions conducted by it, while granting liberty to use the expression '*Team from India*'.

39. However, instead of filing a representation as observed in the Impugned Order, AICF challenged the Impugned Order by filing LPA 697/2025. Notice was issued *vide* order dated 17.11.2025, wherein this Court observed that AICF's prayer for renewal of recognition, based on the 2023-Election, remained pending consideration before the UOI, notwithstanding that the clarification sought by the UOI *vide* letter dated 15.01.2024 had already been furnished by AICF on 06.02.2024. This Court further observed that the 2023-Election had not been set aside or declared invalid by any authority or Court. Accordingly, as an interim measure, AICF was permitted to send a team to the international event scheduled from 02.12.2025 to



06.12.2025 and to use the expressions ‘India’ or ‘Indian’ only for that event. It was further directed that, in the event of any future international event, AICF shall seek leave of this Court before sending any team or initiating the process for selection of players.

40. AICF, thereafter, filed CM APPL. 79570/2025 in LPA 697/2025 seeking leave of this Court to host the 9th Carrom World Championship, 2023 as allotted by ICF, and to conduct the 53rd Senior National Carrom Championship for selecting the Indian Team for the said international event.

41. *Vide* order dated 17.12.2025, notice was issued in CM APPL. 79570/2025 in LPA 697/2025 and response thereto was directed to be filed within two weeks. Pursuant thereto, the UOI/Ministry filed its reply dated 27.01.2026, annexing letter dated 24.01.2026 issued to AICF, stating that there was no change in the status of AICF’s recognition as an NSF.

42. *Vide* order dated 30.01.2026 passed in LPA 697/2025, this Court observed that the letter dated 24.01.2026 could not be treated as the decision expected from the UOI on AICF’s prayer for renewal of recognition based on the 2023-Election. Accordingly, the UOI was directed to take a decision in terms of the order dated 17.11.2025 by the next date of listing.

43. Pursuant to the order dated 30.01.2026, the UOI/Ministry, *vide* order dated 06.02.2026, held that the 2023-Election was not in accordance with the Sports Code or the extant guidelines issued by the Ministry from time to time. Consequently, the said election could not be taken on record, and AICF’s request for renewal of annual recognition as an NSF based thereon could not be considered.

44. AICF challenged the order dated 06.02.2026 by filing W.P. (C) No. 3513/2026 before the learned Single Judge of this Court. Notice was issued



on 18.03.2026, and the UOI/Ministry was directed to file its counter affidavit. In its counter affidavit, the UOI/Ministry stated that the election process undertaken by AICF was not in conformity with the Sports Code and the Guidelines.

45. *Vide* order dated 11.05.2026, the learned Single Judge observed that, although the order dated 06.02.2026 may have been passed in compliance with the directions issued in LPA 697/2025, it could not have been issued without affording AICF an opportunity of hearing. Accordingly, the order dated 06.02.2026 was directed to be treated as a show-cause notice to AICF. The writ petition was disposed of with a direction to the UOI/Ministry to pass a fresh order on AICF's recognition within eight weeks from the date of the order.

46. Pursuant to the order dated 11.05.2026 passed by the learned Single Judge in W.P. (C) No. 3513/2026, the UOI/Ministry passed order dated 10.07.2026 holding that AICF's elections had been conducted in contravention of the Sports Code, the Guidelines and the extant guidelines issued by the Ministry from time to time. Consequently, the said elections could not be taken on record, and AICF's request for renewal of annual recognition as an NSF on that basis was not accepted by the Ministry.

47. AICF has challenged the order dated 10.07.2026 in W.P. (C) No. 10610/2026 before the learned Single Judge of this Court. Notice was issued therein on 30.07.2026, and the UOI was directed to file its counter affidavit within four weeks. The next date of hearing of the said petition is 14.09.2026.

48. In view of the subsequent developments after passing of the Impugned Order by the learned Single Judge, we are of the considered view that AICF's principal grievance regarding non-renewal of its recognition as an NSF has



been addressed by the UOI/Ministry in the order dated 10.07.2026, which is presently under challenge before the learned Single Judge in W.P. (C) No. 10610/2026.

49. Learned SPC for the UOI/Ministry submitted that, in view of the notified provisions of the NSG Act and the NSG Rules, AICF must comply therewith before seeking recognition as an NSF. It was further submitted that, even if AICF succeeds in W.P. (C) No. 10610/2026 and the order dated 10.07.2026 is set aside, AICF would still be required to comply with the NSG Act and the NSG Rules.

50. In view thereof, this Court queried the authorised representative of AICF, who appeared in person, regarding compliance with the NSG Act and the NSG Rules. It was submitted on behalf of AICF that it is willing to comply with the said provisions for seeking recognition as an NSF.

51. The only issue that survives for consideration is whether AICF can use the expressions 'India' or 'Indian' in its name and send an Indian team for national or international Carrom competitions, till such time AICF is recognised as NSF pursuant to compliance with NSG Act and NSG Rules.

52. AICF has relied on the decision of this Bench in **Taekwondo Federation** (*supra*), wherein it was held that withdrawal of recognition or de-recognition of an NSF can take place only by a positive act, after affording the concerned NSF an opportunity of hearing, and cannot occur automatically. The said requirement was held to flow from the principles of natural justice governing administrative action by a public authority or body.

53. A perusal of the letter dated 07.12.2020 issued by the UOI/Ministry shows that AICF was not afforded an opportunity of hearing before renewal of its recognition as an NSF was refused. The said letter is, therefore, contrary



to the analysis of the law in ***Taekwondo Federation*** (*supra*), which requires suspension or withdrawal of NSF recognition to be undertaken only in accordance with Annexure III of the Sports Code, including the prescribed procedure and consequences thereof.

54. Accordingly, the letter dated 07.12.2020 cannot be treated as an order suspending or withdrawing AICF's recognition as an NSF. The said communication merely recorded the Ministry's objection regarding alleged non-compliance with Clause 3.10 of the Sports Code and did not purport to initiate or conclude proceedings under Annexure III thereof. In the absence of a notice, opportunity of hearing, reasoned determination and consequential order passed in accordance with the prescribed procedure, there can be no automatic or deemed withdrawal or de-recognition of AICF as an NSF, as held in ***Taekwondo Federation*** (*supra*) on the basis of letter dated 07.12.2020.

55. Accordingly, Annexure III of the Sports Code was not complied with by UOI at the time of issuance of letter dated 07.12.2020 and, therefore, the same cannot be treated as an order suspending or withdrawing AICF's recognition as an NSF. The said communication did not record that proceedings for suspension or withdrawal had been initiated, nor did it disclose that AICF had been served with a notice or afforded an opportunity to answer the allegation of non-compliance. It also did not contain any final determination, supported by reasons, that AICF's recognition stood suspended or withdrawn.

56. However, the Impugned Order did not examine the legal effect of the letter dated 07.12.2020 on AICF's status as an NSF in the light of Annexure III of the Sports Code. Instead, it proceeded on the premise that non-renewal



of annual recognition, by itself, was sufficient to deny AICF the status of an NSF and restrained AICF from using the expressions ‘India’ or ‘Indian’. Once the Sports Code prescribes a specific procedure for suspension or withdrawal of recognition, that procedure could not have been bypassed based on a communication which neither fulfilled the requirements of notice and hearing nor resulted in a reasoned order. Consequently, the assumption underlying the Impugned Order, namely that AICF had ceased to be an NSF at the time when the Impugned Order was passed, is unsustainable.

57. Accordingly, the Impugned Order is liable to be set aside for having proceeded without considering the mandatory procedure prescribed under the Sports Code for suspension or withdrawal of recognition of an NSF.

58. We may, however, notice that during the pendency of these Appeals, pursuant to the order dated 11.05.2026 passed in W.P. (C) No. 3513/2026, the UOI/Ministry has afforded AICF an opportunity of hearing and has thereafter passed a fresh order dated 10.07.2026. Consequently, the said order is not subject matter of this appeal and it is now under challenge in the pending W.P. (C) No. 10610/2026 before this Court, the legality, validity and effect thereof shall be examined by the learned Single Judge in W.P. (C) No. 10610/2026, which is pending at present. At the same time, we clarify that the present judgment shall not affect the adjudication of W.P. (C) No. 10610/2026, which shall be decided independently and on its own merits.

59. As regards compliance with the NSG Act and the NSG Rules, the same shall have to be complied with by AICF irrespective of the setting aside of the Impugned Order for being recognised as NSF.



60. In view of the foregoing analysis, LPA 697/2025 is allowed and the Impugned Order is set aside. Consequently, LPA 739/2025 and LPA 744/2025 are dismissed.

61. It is clarified that we have not expressed any opinion on the merits of the challenge to the order dated 10.07.2026 passed by the UOI/Ministry, which is the subject matter of W.P. (C) No. 10610/2026. The said writ petition shall be decided independently and uninfluenced by any observations made herein or in the Impugned Order. The present Appeals, along with all pending Applications, stand disposed of in the aforesaid terms. There shall be no order as to costs.

TEJAS KARIA, J

DEVENDRA KUMAR UPADHYAYA, CJ

SEPTEMBER 2, 2026/sms