

MOOT PROPOSITION

**8th SURANA & SURANA
AND
SCHOOL OF LAW,
RAFFLES UNIVERSITY
LABOUR LAW MOOT
COURT COMPETITION
2025**

**Navrang Workers' Union
v.
Navrang Industries Pvt. Ltd.**

A. Facts of the Case

1. Navrang Industries Pvt. Ltd., incorporated in 1995, is a major textile manufacturer in Dakshin Pradesh, operating a spinning and weaving unit at Ratnapur. The company employs about 500 permanent workers and several seasonal and contractual workers.
2. A collective settlement was signed between the management and the Navrang Workers' Union (NWU) in 2015, governing wages and service conditions for 8 years. The settlement expired in June 2023.
3. In July 2023, citing reduced profits and competitive market pressures, the management introduced a productivity-linked wage system. Under this, workers who failed to achieve higher production targets received reduced wages. The Union objected, alleging this was a change in service conditions without following mandatory procedure, and was a unilateral attempt to exploit workers.
4. In August 2023, the management accused workers of deliberately engaging in "go-slow tactics." Notices were issued to 50 employees. A domestic enquiry was conducted, after which 20 workers were dismissed in October 2023. The Union contended that the enquiry was biased, hasty, and in violation of principles of natural justice, as adequate opportunity to defend was not given.
5. On 1st November 2023, the Union called a strike demanding reinstatement of dismissed workers and withdrawal of the new wage system. The management declared the strike illegal, asserting that Navrang Industries was a public utility service and that no statutory notice had been given.
6. During the strike, the management engaged 100 contract workers through Suraksha Labour Supply Agency to continue operations. The Union claimed this was an unfair labour practice and illegal replacement of permanent workers.
7. The dispute was referred to the Industrial Tribunal, Ratnapur, by the Government of Dakshin Pradesh.
8. The Industrial Tribunal, Ratnapur (Award dated 15th March 2024):
 - Held the productivity-linked wage system illegal, being a unilateral change in service conditions.
 - Declared the dismissal of 20 workers void, directing reinstatement with 50% back wages.
 - Declared the strike illegal, but held that workers' conduct did not amount to gross misconduct.
 - Directed the management to phase out contract workers but upheld their engagement during strike as a temporary measure.

9. The High Court of Dakshin Pradesh (Judgment dated 20th July 2024):
 - Set aside the reinstatement order, holding the dismissal valid since the domestic enquiry was “substantially fair.”
 - Upheld the strike as illegal, denying workers any wages for the strike period.
 - Upheld the wage system as a matter of managerial prerogative.
 - Dismissed the Union’s challenge on contract labour, holding the management’s action justified during strike.
10. Aggrieved, the Navrang Workers’ Union filed a Special Leave Petition before the Supreme Court of Dakshin Pradesh on 16th August 2024. The Court granted leave, and the matter is now listed for final hearing.

B. Issues for Adjudication

1. Whether the introduction of the productivity-linked wage system by the management amounts to an illegal change in service conditions or is a valid exercise of managerial prerogative.
2. Whether the dismissal of 20 workers for alleged “go-slow tactics” is valid, justified, and in conformity with principles of natural justice.
3. Whether the strike called by the Union is legal and protected, or illegal and unjustified.
4. Whether the engagement of 100 contract workers during the strike constitutes an unfair labour practice, or a lawful response to ensure continuity of operations.
5. Whether the Union’s acts of picketing and obstruction amount to misconduct disentitling workers to wages during the strike period.
6. What reliefs, if any, are the parties entitled to?

Instructions for Participants:

- Participants must draft written submissions for both the Appellants and the Respondents
- Oral arguments should focus on the interpretation of labour laws in the context of the fair wages, constitutional rights, and principles of natural justice.
- Participants are encouraged to analyze relevant case laws, statutory provisions, and international standards to support their arguments.
- Consideration should be given to the dynamic nature of work in the labour industry and the necessity for evolving legal interpretations to protect the workers.
- No additional issues other than the ones provided should be framed by the participants.

NOTE:

- The laws of the republic of Dakshin Pradesh are *Pari Materia* with the laws of India.