

Blasphemy Laws: Comparative Analysis in Context of India and Pakistan

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Abstract: Blasphemy law is a law relating to the prohibition of blasphemy, which is irreverence or insult towards holy personages, religious groups, sacred artifacts, customs or beliefs. Section 295A was added in the year 1927 in Indian Penal Code to prevent hate speech that insults or attempts to insult the religion or the religious beliefs of any class of the citizens and deliberate and malicious intention to outrage their religious feelings but the main purpose of the law has been to maintain “Public order in multi religious and religious sensitive society. The ant blasphemy laws in Pakistan are very strict as compare to India. Chapter XV of the Pakistan Penal Code deals with offences relating to the religion. Under section 295-c there is death penalty for blasphemy in Pakistan. The new bill proposed by the Punjab government seeks to insert a new section 295AA that stipulates that whoever causes “injury, damage or sacrilege to Sri Guru Granth Sahib, Srimadbhagwatgeeta, Holyquran and Holy bible with the intention to hurt religious feelings of the people” would be liable to awarded life imprisonment, if convicted. Mainly, such kind of blasphemy laws are kind of threat to the liberty of the individuals, because they are depriving the citizens from exercising their right of freedom of speech and expression which is given under the constitution. The human rights commission has been recording blasphemy cases in Pakistan for a long time. Their report says that around 40 percent of people booked under the blasphemy laws belong to the highly discriminated and targeted, Ahmadiyya community. The Human rights commission of Pakistan says blasphemy law continue to be misused, especially against dissidents, with cases in which mere accusations that someone committed blasphemy lead to deadly mob violence. In India too many blasphemy incidents have been reported in previous years. In 2011, the Indian ministry of communications and information technology issued new rules requiring operators of social media networks to screen and remove blasphemous content within 36 hours of receiving a complaint. Blasphemy laws are generally making restriction to the free market of thoughts or ideas. The main argument is that the state needs to use coercive power in deference to the religious sentiments, is a place of illiberal and of dangerous nonsense. So these kind of the laws are infringing the basic right of freedom speech and expression.

Keywords: Blasphemy, Religion, Scientific temper

1. Introduction

In Indian constitution, the word “secular” was added by the 42nd amendment, which makes totally clear that India is a secular country, and the state will not indulge in the religious matter of the people as all religions are equal in the eyes of state or the state is not having its own religion. A blasphemy law is a law relating to the prohibition of the blasphemy, which is irreverence or insult towards holy personages, religious groups, sacred artifacts, customs or beliefs. They are among the oldest and most enduring of the hate speech laws. In Indian Penal Code Section 295A has been used as a blasphemy law to prevent insulting Christianity, Islam and Hinduism. Section 295A was introduced in the year 1927 to prevent hate speech that insults or attempts to insult the religion or the religious beliefs of any class of the citizens and deliberate and malicious intention to outrage their religious feelings but the main purpose of the law has been to maintain “Public order in multi religious and religiously sensitive society”. [1] In India too many people have been arrested for making such kind of wrongs. [2]

In Pakistan, many people are on death row or serving life sentences for blasphemy in Pakistan then in any other country in the world. [3] The anti blasphemy laws in Pakistan are more strict as compare to India. Chapter XV of the Pakistan Penal Code deals with offences relating to the religion. Under section 295-c there is death penalty for blasphemy in Pakistan. The accused of blasphemy are often threatened, harassed, attacked or murdered and those who protect them are also subject to hostilities. Those who are arrested for blasphemy are usually denied bail and also put in solitary confinement. According to the U.S commission on international religious freedoms, 71 countries has

blasphemy laws, but Pakistan is one of the most ferocious enforcer of these laws.

2. Historical Background

In 1920s, mainly the first time collision between the Hindus and the Muslims in the context of blasphemy took the place, by the publication of tracks such as Rangeela Rasool, which mocked the prophet Mohammed. Then because of the pressure of the Muslim community in 1927 British government introduced a new amendment and added section 295-A to the Indian penal code. [4] In 1927, the British colonial rulers of the sub-continent made it a criminal offence to commit “deliberate and malicious acts intended to outrage religious feelings of any class by insulting its religious belief”. The law did not discriminate between religions. The law was retained when Pakistan gained independence in 1947 under the rule of the country’s moderate founder Mohammad Ali Jinnah. Then Mohammad Zial Haq, who was in power for 11 years from 1977, made several additions to its blasphemy laws, including life imprisonment for those defiling the holy Quran. The death penalty for anyone found guilty of defaming Islam was introduced in 1986.

2.1 Constitutional validity of Section 295-A in India

In Ramjilal Modi v. state of U.P [5] the editor of a cow protection magazine had been booked under Section 295A and he took the case before the Supreme Court of the India, while challenging the constitutional of the section itself he argued that this section is not in accordance to the article 19(1)(a) of the constitution. The court in this case held that the exception 19(2) in the interest of public is very wide. This allows the state to put the restriction on speech which

threatens the public order is reasonable restriction and it can be imposed.

In Superintendent Central Prison v. Ram Manohar Lohia, [6] it was held that there must be a proximate link between speech and public disorder, and not a far-fetched “remote” or “fanciful connection”

2.2 Constitutional validity in Pakistan

Article 2 and Article 31 provides that Islam is the state religion and states that it is the country’s duty to foster the Islamic way of life. [7] By its constitution the, official name of Pakistan is the “Islamic republic of the Pakistan” as of 1956. More than 96 percent of Pakistan’s 167 million citizens are Muslims. The Federal Shari at Court is a religious body which rules on whether any particular law is repugnant to Islam. The federal court held that the person convicted under section 295-c must be sentenced to death with or without a fine. In Pakistan, those who are accused of blasphemy may be subject to harassment, threats, and attacks. Police, lawyers and judges may also be subject to harassment, threats and attacks when blasphemy is in issue. It is common for those accused of blasphemy to be put in solitary confinement for their protection from inmates and guards.

2.3 Why Not Anti-Blasphemy Laws

Many countries have abolished, or reduced the penalty for blasphemy on various grounds

Lack of definition of the term religion: - Blasphemy has been described as irreverence towards God or Religion; however the term “religion” itself lacks a proper definition for itself. Belief in God which may unite Judaism, Islam and Christianity, is clearly insufficient as a definition, because some religions such as Hinduism are arguably, polytheistic definition that depends upon a belief on God or Gods would similarly fail to include Buddhism, as it does not include belief in God.

Freedom of religion: - Many jurisdictions have tried to define the term religion through commentaries or Judgments. And Indian constitution also provides for freedom of conscience and free profession, practice and propagation of religion. [8]

The Universal Declaration of Human Rights in its article 18 also protects Atheistic and non theistic views in order to broader the term religion.

If the term religion is broadened enough to include atheism as a religion, then atheism also comes under the purview of freedom of religion and the practicing atheism may fall under the category of blasphemy at many instances.

Freedom of speech and expression: - freedom of speech and expression is a fundamental right in the constitution of various countries including India and it is also a human right. [9] Many international documents have given the freedom of speech and expression a right which cannot be limited due to elements of blasphemy.

The international covenant on civil and political rights in its article 19 states that everyone shall have the right to freedom of expression, this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally in writing or in print, in the form of an Art or through any other media of his choice and right to hold opinion without interference.

A tool for oppression: -Blasphemy for a very long time has been seen as a tool for the majority to oppress the minority. One of the best Examples for it is in Pakistan

Despite incorporating freedom of speech and freedom of religion in the constitution, the Pakistan penal code has incorporated sections that state that any person of the quadiani group or lahori group who by words, either spoken or written, or by visible representation to, or names or calls his place of worship a “Masjid” and that who directly or indirectly poses himself as a Muslim, or refers to his faith In Islam is liable for punishment.

Promotes violence: -The allegation of blasphemy incidents at multiple occasions, leads to violence and have been used by vigilante groups and non state actors to justify and instigate incidents of interreligious violence. [10]

Hurdle in development of scientific Temper:- A large number of incidents have taken place across the world where a rationalist has faced a threat for questioning religious doctrines and has been prosecuted under the blasphemy laws.

2.4 Blasphemy laws in India under Indian penal code 1860

Chapter 15th of the IPC which deals with the offences relating to the religion is framed on the principle, that every person has full freedom to follow his own religion, and that no one is justified to insult religion or religious feeling of another. [11] It makes any deliberate acts pre persuasion for the insult or annoyance of persons of another persuasion punishable. [12]

India being a secular state, the Indian constitution accords equal protection to all religions. Article 25 of the constitution guarantees the right to freedom of religion. All persons are equally entitled to freedom of conscience and the right to propagate, practice and profess the religion of their choice. This chapter of the Indian penal code helps the state in maintaining religious harmony in the country. The offences under this chapter can be broadly classified into following three divisions.

Defilement of places of worship or objects of veneration (section 295 and 297)

Outraging or wounding the religious feelings of persons (295A and 298)

Disturbing religious assemblies (section 296)

Section 295a:- Deliberate and malicious acts, intend to outrage religious feelings of any class by insulting its religion or religious beliefs

Whoever, with deliberate and malicious intention of outraging the religious feelings of any class of citizens of India, by words, either spoken or written, or by signs or by visible representations or otherwise, insults or attempts to insult the religion or the religious beliefs of that class, shall be punished with imprisonment of either description of a term which may extend to 3 years, or with fine or with both.

Section 298:-Uttering words, etc. with deliberate intent to wound religious feelings of any person:- Whoever, with the deliberate intention of wounding the religious feelings of any person, utters any word or makes any sound in the hearing of that person or makes any gesture in the sight of that person, shall be punished with imprisonment of either description of a term which may extend to 1 year, or with fine or with both.

Section 295A and section 298 use different phrases. The former speaks of deliberate and malicious intention of outraging religious feelings of a class of citizens of India. The other speaks any utterances or gestures done with the deliberate intention of wounding religious feelings of a person. The quantum of punishment is much in 295A that is of 3 years.

Sec. 295A does not punish every act of insult to religion. it punishes only deliberate and malicious acts that insult religion or religious beliefs of a class of citizens. So malice is must under this section. [13] Insult caused by any unwilling or unintended expression therefore does not come under purview of section 295A. [14]

Section 95 of the Code of Criminal Procedure gives the power to the state government to forfeit by notification, any newspaper, book or document including any painting, drawing, photograph or any other visible representation, which in its opinion, is punishable inter-alia under section Therefore, police officer may seize copies of such forfeited newspaper or book or document wherever in India. [15]

Blasphemy laws in Pakistan under Pakistan penal code: -

The blasphemy laws in Pakistan are very strict as compare to India, following sections are dealing with the blasphemy laws under Pakistan penal code. These sections are prescribing more punishment for blasphemy. 295. Injuries or defiling place of worship, with intent to insult the religion of any class.

This section of P.P.C, criminalizes destroying, damaging, or defiling any place of worship, help sacred by any class of persons. It also criminalizes person who has an intention to damage or defile a place of worship as an insult to religion. The punishment for the crime is imprisonment for a term which may extend to two years or with fine or with both. [16]

295-A. Deliberate and malicious acts intended to outrage, religious feelings of any class by insulting its religion or religious beliefs.

The purpose of this section is to penalize a person who intentionally insults religious feelings of any citizens of Pakistan by either spoken or written, the punishment imprisonment of either for a term which extend to 10 years or fine or with both. [17]

295-B. Defiling etc. of holy Quran

This section penalizes any willful action of defiling, damaging or desecrating a copy or even an extract of holy Quran or uses it in any derogatory manner or for any unlawful purpose. The punishment for this act is imprisonment of life. [18]

295-C. Use of derogatory remarks etc. in respect of the holy prophet

The punishment for defiling the name of the prophet Muhammad by spoken or written words, or by visible representation, is death, or imprisonment for life and shall be liable to fine.

296. Disturbing religion assembly- causing disturbance to any religion assembly carries the sentence of imprisonment of either description of a term which may extend to 1 year or with fine or with both.

298. Uttering words etc. with deliberate intent to wound religious feelings

Uttering words or making sounds in the hearing of that person or making any gesture in order to intentionally hurt religious feelings of any person punishes with imprisonment of either description for a term which may extend to one year or with fine or with both. [19]

298A- Use of derogatory remarks etc. in respect of holy personages:

Imprisonment of either description for a term which may extend to three years, or fine, or both can be applied to a person who defiles the name of any wife or members of the family of Prophet Muhammad or any of the caliphs or companions.

298B- Misuse of epithets, descriptions and titles, etc. reserved for certain holy personages or places [20]

It is punishable for a person or person belonging to Qadiani group, who call themselves Ahmadispr by any other name to address any person as a Caliph. It is punishable for them to call their worship place Masjid. It is punishable for them to give a call for prayer as the "Muslims" do known as azan. The punishment is imprisonment of either description of a term which may extend to 3 years and shall also be liable to fine.

2.5 Charlie Hebdo Incident in France

The Charlie Hebdo magazine started publishing in France in 1970 with the goal of satirizing religion, politics and other topics. The magazine ceased publication in 1980s due to lack of funds. It resumed publishing in the year of 1992. In

2006, Hebdo reprinted controversial cartoon of the prophet Muhammad that appeared in Danish Newspaper Jyllands-Posten. French president Jacques Chirac criticized the decision and called it "overt provocation". In 2011, the magazine offices were destroyed by a gasoline bomb after it published a caricature of the prophet Muhammad. [21] Many people were killed during this incident. During that time there was not any kind of blasphemy laws in France. So it was the very first violation of freedom of speech and expression in France. So to overcome from such kind of the incidents, And to bring the neutrality in respect to the religious beliefs for both spiritualistic and non spiritualistic views France has strictly prohibited the wearing of the religious symbols to the public places. France has the largest Muslim minority. So to protect the right of the minorities European Human Rights Court even banned wearing Burqa in the public places or also any other kind of the religious symbol in the public places. [22]

(Punjab Amendment) Bill, 2018 Relating to Blasphemy Laws

The Indian law has a section 295A, which says that "deliberate and malicious acts, intended to outrage religious feelings of any class by insulting its religion or religious beliefs will be punishable with imprisonment extending up to 3 years. [23] The bill seeks to insert a new section 295AA that stipulates that whoever causes "injury, damage or sacrilege to SriGuruGranthSahib, Srimadbhagwatgeeta, Holyquran and Holy bible with the intention to hurt religious feelings of the people" would be liable to awarded life imprisonment, if convicted. The proposed Penal code bill seeks to replace the Punjab amendment bill 2016, passed by Akalidial which specifically referred only to acts of sacrilege against the Guru Granth Sahib. [24]

On legal grounds, the drafting of the bill has received criticism for the impressive manner in which sacrilege has been defined; it should have been clearly mentioned as a physical desecration sacrilege otherwise, even for writing a book or an Article, or making a speech, or sketching a cartoon, or drawing a painting, a person can be erroneously accused of blasphemy notwithstanding, the rights guaranteed by article 19 and 25 of the constitution. [25]

Comparative analysis of blasphemy laws of India and Pakistan

The blasphemy laws in Pakistan are very strict as compare to the India the punishment can even extend up to the death of the person who has insulted the Islam or the prophet. And it is clearly the violation of the human rights, as it has been widely misused against the minority communities. One of the most shocking incidents of the notorious Blasphemy laws in Pakistan was the assassination of the Punjab Governor- Salman Taseer, who was brutally shot dead by his own security staff. The murderer, MumtazQadri believed Salmantaseer to have backed blasphemies against the prophet Mohammad allegedly made by a member of Christian community girl, AasiaBibi.

People who are affected by the blasphemy laws in Pakistan

The human rights commission has been recording blasphemy cases in Pakistan for a long time. Their report

says that around 40 percent of people booked under the blasphemy laws belong to the highly discriminated and targeted, Ahmadiyya community. The Human rights commission of Pakistan says blasphemy law continue to be misused, especially against dissidents, with cases in which mere accusations that someone committed blasphemy lead to deadly mob violence. While deaths directly linked to acts of terrorism declined in 2017, the report said attacks against the country's minorities were on rise. [26] A considerable majority of the people supports the idea that people should be punished to insult Islam, but there is inadequate knowledge of what the religious books actually say. Many people support the blasphemy law, which was implemented by the military Dictator General Zia-UI-Haq and is considered direct adaption from the Quran. When Punjab governor Salman taseer was assassinated who was an eminent detractor of the notorious blasphemy law, Pakistan remained divided, with some healing his assassin "MumtazQuadri" as a hero. The national commission of peace and justice says that in last 25 years, 1058 cases blasphemy were registered, of the accused, 456 were Ahmadis, 449 were Muslims, 132 were Christians and 21 were Hindus. Non Muslims, who are four percent of Pakistan's population, are 57 percent of those charged with blasphemy. [27] The other aspect is that, by far, the majority of cases filed in Punjab. The blasphemy incidents are very less in Pakistan as compare to the India due to very strict laws but somewhere they are also infringing the human rights of the general public and now it has been become the tool of oppression for the minorities. And especially there is lack of definition of the term "religion".

In India too many blasphemy incidents have been reported in previous years. In 2011, the Indian ministry of communications and information technology issued new rules requiring operators of social media networks to screen and remove blasphemous content within 36 hours of receiving a complaint.

In January 2015, the well-received and record breaking high-grossing bollywood film PK satirized problems with religion through the eyes of an alien in human form. It was criticized by Hindu nationalist who disliked it satire on "god men" and called for a ban on the film and the arrest of its star Aamir khan and the filmmakers. Director and writer Rajkumarhirani responded by explaining firstly we are human beings and not Hindus and Muslims. Everyone should have the right to freedom of speech and expression whatever they want to.

Mainly section 295 of the Indian penal code criminalizes insult to religion it allows up to three years imprisonment and fines for whoever with deliberate and malicious intention of outraging the religious feeling of any class of citizens of India, by words either spoken or unwritten or by signs or by visible representations or otherwise insults or attempts to insult the religious beliefs of a class. [28] But still blasphemy punishment is very less as compare to Pakistan in India. Even blasphemous acts can end up with death penalty in Pakistan [29] and in India it can end up with 3 years imprisonment only. This is the reason why blasphemy incidents are very much in India as compare to the Pakistan. But still the citizens are able to exercise the

right of speech and expression in broad way, importance to the Individual is still subsisting in India in wide manner as compare to the context of the Pakistan.

Critical analysis of blasphemy laws

Mainly, such kind of blasphemy laws are kind of threat to the liberty of the individuals, because they are depriving the citizens from exercising their right of freedom of speech and expression which is given under the constitution. And these kinds of the laws are also messing with the secularism. A liberal state needs generally two sensibilities, the very first is that many good things are good and derive their authentic meaning precisely from the fact that there is no coercion behind them. The second is that my beliefs and faith even if entirely sound, do not by themselves provide sufficient grounds for the state using its coercion power to enforce them. The main argument is that the state needs to use coercive power in deference to the religious sentiments, is a place of illiberal and of dangerous nonsense. I may respect something, but it does not give sufficient warrant for the state to enforce this belief or sentiment on others. Religious sentiments need not to be illiberal, but they become illiberal when they become the basis for the state enforcing the idea that everyone has to defer to those sentiments. In India too, we are constantly expanding the circle of deference to religious sentiments which is acting as a main reason for disturbing the peace. And in Pakistan the situation is more critical in respect to the blasphemy laws the penalty can even extend with the death. [30] Many people there had been lost their lives by virtue of the blasphemy laws. [31] So there is a clear threat to the freedom of the speech and expression. And basically the minorities are becoming the victim of such kind of the Laws. Pakistan upholds its status as an Islamic state by maintaining various religious laws including the blasphemy law and often disregards human rights standards in the name of protection of state religion. The ratification and implementation of human rights as the key approach to establish that human rights standards can only be effectively implemented in a state or society when there is acceptance for such kind of standards from within that society. Pakistan presents an example of such a society that values its purported religious values and laws more than the human rights standards. And even Pakistan also sets up an example that human rights standards can only take place in a society when the society accepts these standards to be a part of their societal and cultural norms. Without such validation from within the society, human rights will continue to be violated in the name of the religion.

3. Conclusion

As J.S MILL in “On Liberty” and Milton in “Areopagitica” professed for making the world a free market place of ideas where one kind of thought shall not be suppressed neither by state nor by society for helping the society to reach its maximum potential. Gandhi in his Hind Swaraj talking about his own religious beliefs and his differences with Mohammadans in particular about cow slaughter says, “But, just as I respect the cow, so do I respect my fellow-men. A man is just as useful as a cow no matter whether he be a Mohamadan or a Hindu. Am Mohamadan in order to save a cow? In doing so, I would become an enemy of the Mahomedan as well as of the cow. Therefore, the only

method I know of protecting the cow is that I should approach my Mahomedan brother and urge him for the sake of the country to join me in protecting her. If he would not listen to me I should let the cow go for the simple reason that the matter is beyond my ability. If I were overfull of pity for the cow, I should sacrifice my life to save her but not take my brother's. This, I hold, is the law of our religion.”

As we have seen in various instances of middle ages in Europe where church used its authority in various ways to persecute minorities and their own subjects (women, slaves) and instances like Salem Witch Trials of 1693 in USA where more than 200 people were accused and 19 were found guilty of Witchcraft and were punished by death.

Pakistan which has been severely notorious in regard to Minorities persecution and blasphemy laws reveals a bad state of affairs - 1,472 people were charged under Pakistan's blasphemy laws between 1987 and 2016, according to statistics collected by the Center for Social Justice, a Lahore-based advocacy group. Of those, 730 were Muslims, 501 were Ahmedis — a sect that is reviled by mainstream Muslims as heretics — while 205 were Christians and 26 were Hindus [32].

India's picture with the increase in instances of lynches mobs taking over as cow vigilantes and rise in Right Wing Elements in mainstream politics provides an equally worrisome trend. One needs to revisit and think where are we heading to as society where one can be subjected to death penalty for uttering words against an infallible institution like GOD. In the countries like Pakistan such kind of incidents are very common. And many person are on the death row in Pakistan just because of these laws. [33]

I will conclude the essay with just an instance of religious fanaticism and leave it up to the reader to decide whether State shall be given power to interrupt in personal matter of religion. - One of the most infamous quotes associated with religious fanaticism was uttered in 1209 during the siege of Béziers, a Crusader asked the Papal Legate Arnaud amalric how to tell Catholics from Cathars when the city was taken, to which Amalric replied: "*Caedite eos. Novit enim Dominus qui sunt eius*" or "Kill them all; God will recognize his."

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