International Labour Conference
114th Session, Geneva, 2026

Committee on the Application of Standards

Date: 18 May 2026

If they so wish, Governments appearing on the preliminary list of individual cases have the opportunity to supply on a purely voluntary basis, written information before 18 May 2026.

Information on the application of ratified Conventions supplied by governments on the preliminary list of individual cases

India (ratification: 1949)

Labour Inspection Convention, 1947 (No. 81)

The Government has provided the following written information.

Articles 2, 3 and 4: Labour inspection in special economic zones(SEZs)

At the outset, the Government reiterates that functions of labour inspection under Article 3(1) of the Convention continue to be carried out in SEZs through competent labour enforcement authorities under applicable labour laws. Labour inspection in SEZs is undertaken through regular state labour enforcement machinery and, wherever powers have been specifically delegated, also through the Development Commissioners of the concerned SEZ zones.

India has seven Central Government SEZ zones, namely Noida SEZ, Cochin SEZ, Kandla SEZ, SEEPZ SEZ, MEPZ SEZ, Visakhapatnam SEZ and Falta SEZ covering all 28 states/UTs. These zones comprise 277 SEZs across the country and employ over 1.9 million workers in 5,341 establishments.

It is clarified that delegation of certain labour inspection-related powers to Development Commissioners varies across all SEZ zones. Wherever such delegation has been made, it has been done by competent state government. The delegation remains at the prerogative of states, based on administrative and jurisdictional requirements.

Importantly, even in several of the states where powers have been delegated to Development Commissioners, the regular state labour enforcement machinery continues to exercise its statutory inspection and enforcement functions in parallel. Therefore, delegation to Development Commissioners does not, as a general rule, exclude or replace inspections by state labour authorities.

Only in certain states, namely Uttar Pradesh, Andhra Pradesh and Telangana, the delegated powers are presently being exercised by the Development Commissioners for inspections in SEZs, as per the applicable delegation arrangements. The Development

Commissioners are empowered to impose sanctions or initiate proceedings in such cases. In remaining states, inspections are undertaken either by state labour enforcement authorities or through a combination of state authorities and Development Commissioners. Accordingly, labour inspection in SEZs is not dependent solely on Development Commissioners.

Consolidated data for the period 2022–26 from seven central SEZ zones indicates that 949 labour inspections were conducted. Around 70 per cent of these were conducted by state government labour enforcement authorities, demonstrating that labour inspection in SEZs continues to be substantially undertaken by regular state government machinery. A significant proportion of these inspections in the SEZ Zones were unannounced (around 60 per cent).

During this period, 63 violations were detected, 17 fines were imposed and proceedings (legal action in court) were initiated in one case. In remaining cases, violations were addressed through corrective compliance, rectification, follow-up verification or other enforcement measures available under applicable law. In 2025–26, 217 inspections were conducted with detection of 9 violations.

Furthermore, the Occupational Safety and Health and Working Conditions Code (OSH and WC Code), 2020, which came into force on 21 November 2025, strengthens inspection frameworks through randomized, risk-based, web-based inspection schemes and empowers enforcement machinery to undertake inspection/enforcement functions, including entry into workplaces, examination of records, collection of evidence and initiation of appropriate action.

The Government also had productive consultations with ILO Delhi during the formulation of the Labour Codes. The ILO's inputs were duly considered for their finalization and helped in strengthening the robustness of labour governance and inspection frameworks.

In addition, the Government and the ILO have worked closely in the area of labour inspection. Joint initiatives included the 58th Conference of Chief Inspectors of Factories at Bhubaneswar (February 2024), training on strengthening labour inspection and OSH in Assam (August 2024), and the TOT Workshop on the ILO's WIND/WISE methodology in Assam (September 2024). The Government looks forward to further collaboration in this area.

The Government is also taking steps to further improve consolidation of SEZ-wise inspection data, including inspections conducted, violations detected, fines imposed and proceedings initiated. The Government remains committed to ensuring effective labour inspection in SEZs and looks forward to continued constructive engagement with ILO.

Articles 4, 20 and 21: Availability of statistical information on activities of the labour inspection services

At the central level, labour inspections are carried out through following agencies:

- Chief Labour Commissioner (Central) (CLC(C)) – enforces labour laws and oversees industrial relations in central sphere establishments. Relevant laws: Code on Wages, 2019, Industrial Relations Code, 2020, OSH and WC Code and Social Security Code, 2020.
- Directorate General of Mines Safety (DGMS) – regulates safety and welfare standards in mines. Relevant laws: OSH and WC Code 2020 (subsumed the Mines Act, 1952).
- Directorate General, Factory Advice Service and Labour Institutes (DGFASLI) – conducts inspections of docks/ports. Relevant laws: OSH and WC Code 2020.

- Employees' Provident Fund Organisation (EPFO) – administers provident funds, pension etc., and inspects establishments for social security related compliances. Relevant laws: Social Security Code, 2020.
- Employees' State Insurance Corporation (ESIC) – delivers health/social security benefits and inspects establishments for social security related compliances. Relevant laws: Social Security Code, 2020.

Data on inspections of these organizations is publicly published each year in Ministry of Labour and Employment's Annual Report.

The consolidated data from aforesaid agencies:

Year	Total inspections	Number of violations detected	Penalties (in US$ millions)	No. of cases where proceedings initiated	Inspections done per million US$ penalty
2022–23	134 268	179 851	362.1	11 488	371
2023–24	97 712	156 996	414.4	9 429	236
2024–25	109 872	139 576	603.9	8 058	182

Overall, India's labour inspection system reflects a shift towards technology-driven, risk-based, outcome-oriented model, rather than a purely volume-based approach. While inspections remained substantial, averaging 113,950 annually (2022–25), the focus is towards improving inspection quality and compliance outcomes for workers.

The summary for period 2022–25 is:

- 341,852 inspections;
- 476,423 violations detected;
- penalties amounting US$1,381 million;
- 28,975 proceedings;
- in 2022–23, 134,268 inspections resulted in 179,851 violations being detected, with penalties of US$362.1 million and 11,488 proceedings;
- in 2023–24, 97,712 inspections led to 156,996 violations detected and US$414.4 million in penalties, alongside 9,429 proceedings;
- in 2024–25, 109,872 inspections resulted in 139,576 violations detected, while penalties rose significantly to US$603.9 million with 8,058 proceedings.

For 2022–25, the inspection system recorded an annual average (per year) of:

- 113,951 inspections;
- 158,808 violations detected;
- US$460 million in penalties;
- 9,658 proceedings.

Key trend:

- The number of inspections required to realize each million dollars of penalty declined significantly from 371 in 2022–23 to 236 in 2023–24, and further to 182 in 2024–25, indicating increasingly targeted and efficient inspections. This indicates that there is improved inspection quality which is achieving better compliance outcomes for workers.

Further, central agencies have strengthened data systems, undertaken digital verification, field surveys and outreach initiatives to promote employer registration through the Shram Suvidha Portal. Such efforts are backed by India's Labour Codes, which introduce provisions on electronic single registration, submission of a single return, and issuance of a single all-India licence with a validity of five years. The organization-wise outcomes, with information on workplaces, staff, registration, occupational diseases, accidents etc., is below.

CLC(C)

- workplaces liable to inspection: 180,739;
- adoption of online unique Labour Identification Number (LIN) system promoted. LIN is unique identification allotted to establishments under the Shram Suvidha Portal, for providing single common identifier across enforcement agencies;
- Year wise registrations (new) are given below:

Year	New establishment registrations (LIN generated)
2022	19 411
2023	20 622
2024	21 617
2025	22 333

- from 2022–25, 83,983 new establishments registered;
- workers covered increased from 3,200,493 (2022–23) to 3,493,732 (2024–25);
- inspectors increased from 99 to 134 (2022–26);
- Decrease in building and other construction workers' accidents from 59 (2023–24) to 27 (2025–26).

DGMS

- workplaces liable to inspection: 20,640;
- online registration systems/mine codes implemented;
- workers covered increased from 530,616 (2024–25) to 541,685 (2025–26);
- mines under regulatory framework increased from 14,691 (2022–23) to 20,640 (2025–26) (40.5 per cent rise);
- inspectors increased from 145 to 179 (2022–26);
- accidents across coal, metal, oil sectors declined by 21 per cent (2022–25);
- number of cases of occupational diseases decreased from 23 to 9 between 2024–2025.

EPFO

- workplaces liable to inspection: 817, 622;
- real-time data collection through the Electronic Challan-cum-Return (ECR) system (used for online filing of contribution and employee records);
- establishments covered increased from 2,57,469 (2022–23) to 2,86,894 (2024–25) (11.5 per cent);
- workers covered increased from 68,545,747 (2022–23) to 79,349,839 (2025–26) (15.8 per cent);
- inspectors increased from 2038 to 2508 (2022–2026).

ESIC

- workplaces liable to inspection: 2,483,511;
- workers covered increased from 30,542,660 (2022–23) to 32,429,970 (2024–25);
- 8,89,428 establishments registered (2022–25);
- inspectors increased from 1,807 to 2,217 (2022–26);
- under the Scheme for Promotion of Registration of Employers and Employees 2025, 138,718 new units and 11,272,772 workers brought under coverage;
- 399 worker beneficiaries in 2023 and 2024 for occupational diseases.

DGFASLI

- workers covered increased from 31,821 (2022–23) to 35,710 (2025–26);
- 48 cases of industrial accidents found between 2024 and 2026.

Articles 10 and 22: Material means and human resources

In central sphere:

- labour inspectors increased from 4,089 (2022–23) to 5,038 (2025–26) (23.2 per cent rise);
- 1,887 new labour inspectors recruited (2022–26);
- 1,037 new recruitments in 2025–26 alone.

Also, for representative assessment, data has been compiled from 8 out of 36 states/UTs (Rajasthan, Maharashtra, Andaman and Nicobar Islands, West Bengal Chhattisgarh, Bihar, Tamil Nadu and Himanchal Pradesh), representing different regions. 743 new labour inspectors were recruited (2022–26), in these states.

Inspectors are regularly trained on enforcement tools and Labour Codes, and are provided facilitative resources such as transport allowance, daily allowance and laptops. The Government welcomes continued collaboration with the ILO for the capacity-building of labour inspectors in line with the Convention.

Articles 12 and 17: Free initiative of labour inspectors to enter workplaces without previous notice

In India, the digital inspection framework, including Shram Suvidha Portal, provides for randomized, risk based inspection systems that use automated algorithm-based assessment mechanisms. It identifies likely defaulters based on objective parameters like compliance history, nature of violations, and other risk factors.

The system is intended to enable more focused, evidence-based and efficient inspections, so that enforcement resources are directed towards establishments with a higher probability of non-compliance, thereby enhancing protection and workers' welfare. This is done without curtailing the statutory powers of inspectors to undertake inspections, including unannounced inspections, wherever warranted.

Under the Code on Social Security, 2020 (section 122) and the OSH and WC Code, 2020 (section 35), inspectors are vested with wide statutory powers to conduct inspections, including unannounced inspections, examine persons, require production of records, conduct searches and seizures, collect copies of registers and documents, take photographs, video-graphs and samples, inquire into accidents and dangerous occurrences, issue notices, and initiate, prosecute, conduct or defend proceedings before courts.

It is clear that the provisions relating to section 110 of the OSH and WC Code and section 54(3) of the Code on Wages do not restrict the authority of inspectors to initiate legal proceedings without prior warning or based on complaints, wherever serious violations, repeated non-compliance, or offences requiring prosecution are detected. The intent is not to dilute enforcement mechanisms, but to encourage prompt rectification for workers, thereby reducing prolonged litigation.

The Labour Codes/draft Central Rules were finalized after 94 extensive consultations with various stakeholders, that is, Governments, employers' associations, workers' representatives, state governments, etc.

The Government also consulted with ILO Delhi during the process. The ILO provided feedback in alignment with international labour standards and protection of workers' rights, which was duly considered while the Codes were being finalized. This consultative approach facilitated the strengthening of labour governance/inspection framework in the country.

With regard to unannounced inspections, it is submitted that the overall inspection system is undergoing a transition from manual/discretionary inspection allocation to a structured, digital, risk-based system. During such transition, the composition of announced and unannounced inspections will be further sharpened across organizations, based on risk parameters, complaints, sectoral priorities, compliance history, and verified digital data.

However, the legal authority to conduct unannounced inspections remains intact. For instance, in SEZ zones, from 2022–23 to 2025–26, around 60 per cent of inspections were unannounced. Also, in 2025–26, 97 per cent inspections under DGFASLI and 68.3 per cent under ESIC were unannounced.

With regards to data on section 54(3) of the Wages Code and section 110 of OSH and WC Code, the Government respectfully submits that Labour Codes have come into force from 21 November 2025 and the rules made thereunder have been finalized only recently on 8 May 2026. Accordingly, data on aforesaid sections will be shared in due course. The Government will continue its constructive collaboration with ILO Delhi on this matter.