

INTERSECTION OF MENSTRUAL RIGHTS AND REPRODUCTIVE JUSTICE: A CASE STUDY OF BEED DISTRICT IN MAHARASHTRA

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ABSTRACT

The paper focuses on the case study of Beed district, Maharashtra where women are forced to remove their ovary for productivity in the sugarcane farming sector. The research highlights the intersection of menstrual rights with reproductive rights. The journey of a woman from childhood to adulthood involves many facets, and one of the major phases of a woman's life is menstruation & reproduction. A woman in her entire life is discriminated due to several factors that are associated to menstruation as well as reproduction. Menstruation is an essential right which should be seen in the purview of reproductive justice. Farmer woman in the district of Beed, Maharashtra due to heavy bleeding could not work in the fields of sugarcane which hinders the productivity of work. The woman of Beed district will not even be able to reproduce as they are asked to remove their ovaries so that they do not menstruate. The woman due to systemic injustices could take drastic steps which can affect their health and their individuality too. Economic pressure for families also encourages women to take such steps which affect their choices and individuality on bodily autonomy. Firstly, the researcher will study the intersectionality of menstruation and reproduction in the light of constitutional rights. Secondly, the researcher will emphasize the need of woman to be aware of their rights affected during menstruation. Thirdly, the paper will examine the effect of menstruation on women working in farming sector in Beed district which is leading to unproductivity in their workplace. Lastly, the paper will bring suggestions regarding policy intervention and legislation to overcome the societal discrimination arising from menstruation and reproduction. Methodologically, the paper applies doctrinal research which investigates the theories of reproductive justice and menstrual justice by focusing on the case study.

Keywords: Menstruation, Reproduction, Justice, Rights, Intersection.

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INTRODUCTION

The intersectionality of rights and justice in terms of menstruation and reproduction is not only the connection between the two, but also it is the connections which play different roles in the different space and identity (race, class, caste, gender). Gender justice is a broad term which includes transgender, female and male of the society.¹ To address gender inequality the focus must be on the root causes of an issue, either menstruation or reproduction. Menstruation and reproduction are often divided into two different frameworks of health, yet they are deeply associated with each other by several factors such as, political, social, and cultural, frameworks which bind them together. Beyond other reasons menstruation and reproduction are also shaped by gender norms and discrimination, which causes violation of rights. The right guaranteed by Indian constitution are fundamental rights which is essential for every individual to move towards justice in terms of menstruation and reproduction also. Article 14, 15 and 21 of the Indian Constitution which guarantees rights to women regarding their choices and promote equality.²

The women in the society feel a sense of security because of the fundamental rights such as right to equality, right to privacy, right to dignity, work, health and religion that is ensured under the constitution of India regarding the menstrual rights and reproductive right.³ Reproduction is the basis of a new beginning of life, from menstruation to reproduction they both plays a crucial role in life of a women. The social and cultural taboos surrounding menstruation and interconnected to gender discrimination and marginalization.⁴ There is intersectionality of reproductive rights and menstrual rights, which promote inclusivity within the society and families. Menstrual justice is itself the part of reproductive justice, as both cannot go alone.

Reproductive rights with time gain attention of society, though menstrual rights are still ignorant to talk about. The Maharashtra district, which is in fact a progressive place in terms of work and lifestyle, but people in the rural areas are much more dominated by the patriarchal setup and less job opportunities. The case study of Beed district is one of a kind where female is treated in an

¹ "Gender Development and Justice: Ensuring Equality and Fairness," Sociology Institute (2025), last visited Mar. 2, 2026.

² The Constitution of India, 1952

³ The Constitution of India, 1952

⁴ Margaret A. McLaren & Monalisa Padhee, A Sexual and Reproductive Health Rights Approach to Menstruation, 29(1) [Gender & Development](#) 131 (2021).

undignified way because they are menstruating during the work time, equality is the back seat by these practices. The Beed district is considered as the most vulnerable and poorest district of Maharashtra, where sugarcane workers and migrant workers work in a small level.⁵ The women workers are often treated with inequality due to menstruation and reproduction. Menstruation is a blessing in a women life which is a powerful thing, which need to be addressed with dignity and respect.

The paper will explore the contesting case study of Beed district Maharashtra, where female is even denied of their basic human rights. The intersection of menstrual and reproductive rights through the help of case study of Beed district will be discussed in the paper. The women rights through the lens of intersectionality of reproduction and menstruation, shaping the norms and taboos. The women face oppression due to lack of health care resources as well as lack of awareness about their fundamental rights. The basic hygiene must be followed by the women to safely enjoy their reproductive rights. The economic status also acts as barrier for women, to practice their rights freely. Females are comparatively paid less also for the seasonal farming work which is the main factor impacting their health and rights.⁶ The women must work for upliftment of their families, and during menstruation they have only certain options left due to lack in policies and frameworks. From the perspective of Indian scenario menstrual stigma and limited reproductive rights reinforce both with each other.

Methodologically the paper deals with doctrinal research also known as black letter law research. Further, the researcher has focused on the case study of a district in Maharashtra. The research focuses on secondary data like books, research articles and reputable online data sources. The research carries out a case study with the help of articles. The research is limited to doctrinal research and does not involve empirical research. The findings are limited to the knowledge available in the reputable online data source.

WOMAN IN FARMING SECTOR IN THE BEED DISTRICT OF MAHARASHTRA

⁵ Priya Varadarajan, Bitter Reality: Mass Hysterectomy of Women Workers in Beed's Sugarcane Fields, The Quint (2021) <[Bitter Reality: Mass Hysterectomy Of Women Workers In Beed's Sugarcane Fields](#)>.

⁶ Amrut Arun Swami, Hysterectomies and bodily autonomy in female migratory farm labourers in the unorganized labour sector in Beed district of Maharashtra: A Review Article, 9(2) VIMS Health Sci. J. 62 (2022).

The intersection of menstruation and reproduction remains a very unexplored issue in the context of gender justice and health.⁷ The rights related to menstruation is closely related to reproductive rights, and if menstrual health is not adequate then it may affect the reproductive health. Places like North Karnataka, Beed, and Sangli are the places where mostly sugarcane is cultivated, and it needs more quantity of water to get cultivated. The population there is mostly dependent on the wages earned by sugarcane cultivation or by working in the sugarcane farming.

The Beed district attained popularity nationally in 2020 and 2021 after a news break down regarding the mass hysterectomy in women and even young girls.⁸ The women in the region of that district are deprived even of their basic human right. The right towards healthy and dignified menstruation and reproduction is also compromised by the women to get proper wages. As, during the time of menstruation the female undergoes a lot of changes which change their day-to-day life, which causes trouble for the sugarcane workers and the employers. Heavy bleeding during menstruation can cause trouble while working in the fields which can affect their work, so they are usually advised by the family doctors and contractors to undergo hysterectomy.⁹

The process of hysterectomy, where ovary is removed due to any circumstance or the absence of uterus in the body because of which the women are unable to menstruate and reproduce. The contractor in the region hires the laborers for six months at very cheap rates, where they are asked to migrate in the belt where sugarcane is cultivated in INR 100 only for a day. The more vulnerable is the women in the labors also, who are paid even more less and are not allowed to take off during periods or pregnancy. They are instead forced to go through hysterectomy to prevent menstruation and pregnancy. The NFHS data record 5% of the female who undergoes hysterectomy aged group from 25-49 years.¹⁰ The Maharashtra commission for women highlights the data of hysterectomy

⁷ Anuj Kapilashrami, What Is Intersectionality and What Promise Does It Hold for Advancing a Rights-Based Sexual and Reproductive Health Agenda?, 46(1) Int'l J. Health Servs. 1 (2019) <[What is intersectionality and what promise does it hold for advancing a rights-based sexual and reproductive health agenda? | BMJ Sexual & Reproductive Health](#)>.

⁸ Priya Varadarajan, Bitter Reality: Mass Hysterectomy Of Women Workers In Beed's Sugarcane Fields, The Quint, (2021) Feminism in India <[Bitter Reality: Mass Hysterectomy Of Women Workers In Beed's Sugarcane Fields](#)>.

⁹ Diksha Modi, Shocking Report: Wombs of 843 Sugarcane Labourers Forcibly Removed in Maharashtra's Beed, News 18 (2025). <[Shocking Report: Wombs Of 843 Sugarcane Labourers Forcibly Removed In Maharashtra's Beed | India News - News18](#)>.

¹⁰ Priyanka Kumari & Jhumki Kundu, Prevalence, Socio-Demographic Determinants, and Self-Reported Reasons for Hysterectomy and Choice of Hospitalization in India, 22 BMC Women's Health 514 (2022) <[Prevalence, socio-](#)

is more in the region and several reports and news intervened about the large amount of hysterectomy in Beed district.¹¹

The story that is discussed in the platform of *the print* where a female who was married very young tells that before turning 18, she was mother to three Childs and later when she turned 20, she was forced to undergo hysterectomy. She further quotes that she was working as a sugarcane cutter in the fields where due to menstruation she was asked to remove her uterus. So that she can give productivity at work, but she says after this her life has changed and is destroyed as she is not even able to sleep during the night because of the pain she suffers.¹²

The issue of hysterectomy in the district of Beed is not only essential in terms of understanding the issue of reproductive rights and menstrual rights but also essential to highlight the need for making laws for the unorganized labors. The exploitation of labors and specifically the women workers is rising high due to such practices of forcing women to remove their uterus. The removal of uterus is not only exploitation of women labor, but also the exploitation of fundamental rights enshrined in the Indian constitution as well as the health and bodily autonomy of an individual. The women who need to decide for her own body if whether she want to remove her uterus or not, as hysterectomy itself brings a lot of health hazards for lifetime. This kind of process can be seen as structural violence and inequality, where women are subjected to discrimination and violence based on poverty, gendered labor discrimination and health care failures. Hope and equality are crushed in the name of work and labor.¹³

The state intervened in this matter and called it a matter of health importance. The government decided to direct the hospitals to ensure proper knowledge of the surgery to the person who is going through that surgery and further, stated that there must be surgery after pre- approval by the

[demographic determinants, and self-reported reasons for hysterectomy and choice of hospitalization in India | BMC Women's Health | Full Text](#)>.

¹¹ Tabassum Barnagarwala, Panel Formed to Investigate Unusually High Number of Hysterectomies in Beed, The Indian Express (Jan. 17, 2019) <[Panel formed to investigate unusually high number of hysterectomies in Beed | Mumbai News - The Indian Express](#)>.

¹² Jyoti Shinoli, How Women Sugarcane Workers in Maharashtra's Beed Deal with Side Effects of Hysterectomy, Scroll.in (2022) <[How women sugarcane workers in Maharashtra's Beed deal with side effects of hysterectomy](#)>.

¹³ Jyoti Shelar, A harvest of crushed hopes: Why number of hysterectomies are high in Maharashtra's Beed district, The Hindu (2019) <[A harvest of crushed hopes: Why number of hysterectomies are high in Maharashtra's Beed district - The Hindu](#)>.

district surgeon.¹⁴ The issue of mass hysterectomy gained attention but no proper implementation of legal framework. The issue is related to the serious labor rights issue as there is not enough framework for the unorganized workers, it was not possible to regulate them under these laws. The government has recently directed a committee to keep a check over the issue of mass hysterectomy.¹⁵

MENSTRUAL JUSTICE AND REPRODUCTIVE JUSTICE:

Reproductive justice is a concept that is a part of social justice which intersects race, gender, caste and class to address structural inequality among the society.¹⁶ Reproductive justice started with social movements, which is a broader concept and is beyond just reproductive rights. The ability to choose about own body that is considered as a part of social, economic and Political moment. Reproductive justice aligns mainly with three functions a.) right to have children, b.) right not to have children c.) right of upbringing the children in healthy and safe environment. Reproductive justice demands bodily autonomy for every human being.¹⁷ On the other hand menstrual justice aligns with the reproductive justice, as in menstrual justice is also about bodily rights and access to clean toilets, access to menstrual products, sanitation facilities and health of women.¹⁸ Gender justice cannot be achieved without achieving menstrual justice and reproductive justice.

Intersectionality often refers to the system of oppression and discrimination of multiple identities interacting.¹⁹ The intersectionality in terms of menstruation and reproduction will highlight all the aspects in all the classes and sections of society, also it will delve into how both are related to each other. Reproductive justice term was coined by twelve black women in 1994, working for pro-

¹⁴ PTI, Over 200 Women in Maharashtra's Beed Underwent Hysterectomies Between 2022–25: Centre, The Week, (2025) < [Over 200 women in Maharashtra's Beed underwent hysterectomies between 2022-25 Centre- The Week](#)>.

¹⁵ Vicky Pathare, State to revamp panel monitoring hysterectomies in Beed amid rising concerns, Hindustan Times, (2026) < [State to revamp panel monitoring hysterectomies in Beed amid rising concerns | Hindustan Times](#)>.

¹⁶ Zakiya Luna & Kristin Luker, Reproductive Justice, 9 Ann. Rev. L. & Soc. Sci. 327 (2013). <<https://doi.org/10.1146/annurev-lawsocsci-102612-134037>>.

¹⁷ Loretta J. Ross & Rickie Solinger, *Reproductive Justice: An Introduction* (University of California Press 2017) <https://books.google.com/books?hl=en&lr=&id=y6owDwAAQBAJ&oi=fnd&pg=PA1&dq=reproductive+justice&ots=jqaWBt7Dsw&sig=W_X-93uXKjnnhd8aERD30pry3mc>.

¹⁸ Lillian Bagala et al., There Can Be No Gender Equality Without Menstrual Justice, 382 BMJ p2079 (2023) <[There can be no gender equality without menstrual justice | The BMJ](#)>.

¹⁹ Kimberlé Crenshaw, Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory, and Antiracist Politics, 1989 U. Chi. Legal F. 139 (1989) <chicounbound.uchicago.edu/cgi/viewcontent.cgi?article=1052&context=uclf>.

choice movement.²⁰ Bodily autonomy is fundamental principle as a hinge for reproduction and menstruation. The bodily autonomy of a women is at stake if the agency will not take control over the rights about menstruation and reproduction. Women do have right to decide for their own body, either of managing menstruation with dignity and respect or the bodily rights for abortion or contraception. Rights towards reproductive health and hygiene must be the priority. The conditions where women need products (sanitary pads, tampons) to maintain hygiene during menstruation to protect themselves from diseases which could further become barrier to overall reproductive health. Stigma around menstruation can lack women in education and make women silent of their reproductive health.

The intersectionality in terms of menstruation is about structural inequality and discrimination among class, caste, religion or other factors.²¹ Menstruation and its norms can be examined through the lens of intersectionality and power dynamics shaping the experiences of women through sociocultural and political influence.²² The case of Beed district is closely linked to the reproductive rights as well as menstrual rights wherein the intersectionality based on class, gender is prevalent. The class could be highlighted through the financial constraints that unable women to maintain their menstruation as well as reproduction in dignified way. On one hand the womb of woman is commodified by means of surrogacy and on the other hand the surgery such as hysterectomy is suggested as solution of problem relating to menstruation or reproduction.²³ The main reason of this difference is the economic and social pressure.

The access for the menstrual products which are getting even costlier which is also not accessible for the public. Period poverty is one of the most common things which leads towards inaccessible human rights. The women in India concerns about the health that is compromised in the name

²⁰ Loretta J. Ross, Reproductive Justice as Intersectional Feminist Activism, 19 Souls 286 (2017) <[Reproductive Justice as Intersectional Feminist Activism: Souls: Vol 19, No 3](#)>.

²¹ Shreya Atrey, The Humans of Human Rights: From Universality to Intersectionality, 20 Hum. Rts. L. Rev. 133 (2020) <[The Humans of Human Rights: From Universality to Intersectionality by Shreya Atrey :: SSRN](#)>.

²² Josefina Pruneda Paz et al., An Intersectional Approach on Menstrual Inequity as Lived by Women in Circumstances of Socioeconomic Vulnerability in an Urban and Rural Setting in Spain: A Qualitative Study, 31(1) Int'l J. Equity Health 32 (2024) <[Full article: An intersectional approach on menstrual inequity as lived by women in circumstances of socioeconomic vulnerability in an urban and rural setting in Spain: a qualitative study](#)>.

²³ Shahida Shahida, Why Are Menstruating Women in India Removing Their Wombs? Neoliberalism and Reproductive Justice: Unveiling the “Womb Divide”, 18 Asian J. Women’s Stud. (2025)< [‘Why are Menstruating Women in India Removing their Wombs?’ Neoliberalism and Reproductive Justice: Unveiling the ‘Womb Divide’ | Asian Bioethics Review | Springer Nature Link](#) >.

taboo and stigmatization. The structural inequality in the society leads to barrier towards women empowerment.²⁴ The notion about menstruation and reproduction has played a central role to form gendered experiences and taboos in the society.²⁵ Across many cultures women faces exclusion from their families' religious practices, education and even denied for human rights.

Similarly, reproduction has long been a way to control the marginalized women's bodies.²⁶ Previously tracing the time there was less resources for female who undergo pregnancies, they were even not getting the basic facilities. The reproductive rights movement has gained significant legitimacy in the recent scenario by casting the rights towards human rights.²⁷ The rights of women in terms of the procedure of forced hysterectomy, denial of abortion rights, lack of maternal healthcare is compromised which leads to the gender hierarchies. The intersection of menstruation and reproduction is particularly important: as menstrual rights are even still now not seen in any context even in the broader context of sexual autonomy and bodily rights, though it is important to understand the need for providing intersectional study for the importance of menstruation form the reproductive health, hygiene, disease and bodily autonomy too.

Gender justice incorporates the concept of menstruation and reproduction to be seen in intersection with all the rights that act as social justice. The intersection involves dismantling the stigma and ensuring healthcare facilities in terms of menstruation and reproduction as a basic right of women. Women have their personal choice and autonomy regarding their body. The constitution of India guarantees women liberty, dignity and equality, which is essential to incorporate bodily autonomy. As being the victim of extreme poverty, persistent drought in the farms, failure of crops and rising debts of farmers in the Beed district of Maharashtra, farmers are left with no other choice than compromising with their own bodies.

²⁴ Margaret A. McLaren & Monalisa Padhee, A Sexual and Reproductive Health Rights Approach to Menstruation, 29(1) Gender & Dev. 131 (2021) <[A sexual and reproductive health rights approach to menstruation: Gender & Development: Vol 29, No 1](#)>.

²⁵ Joan C. Chrisler, Leaks, Lumps, and Lines: Stigma and Women's Bodies, 35(2) Psychol. Women Q. 202 (2011) <[Leaks, Lumps, and Lines - Joan C. Chrisler, 2011](#)>.

²⁶ Meghan G. Daniel, The Social Movement for Reproductive Justice: Emergence, Intersectional Strategies, and Theory Building, 15(8) Sociol. Compass e12905 (2021) <[The social movement for reproductive justice: Emergence, intersectional strategies, and theory building - Daniel - 2021 - Sociology Compass - Wiley Online Library](#)>.

²⁷ Rachel Rebouché, Reproducing Rights: The Intersection of Reproductive Justice and Human Rights, 7 UC Irvine L. Rev. 579 (2017) <[Reproducing Rights: The Intersection of Reproductive Justice and Human Rights Symposium Issue: Baby Markets 7 UC Irvine Law Review 2017](#)>.

The women in the district work in the sugarcane farms to maintain their livelihood, for which they must work for long hours with less breaks and holidays. Living becomes even more difficult during the time of menstruation as it reduces productivity at work; therefore, to overcome this impediment they must go through hysterectomy.²⁸ The less awareness and knowledge about woman reproductive organ is also a threat for women in rural areas which force them to take these drastic steps, which lead to women health deprivation.²⁹

The unskilled nature of work is usually compromised in terms of education and employment practices. The organized sector though in India has efficient laws and regulations which govern their employee, though less attraction is towards the individuals working in unorganized sector.³⁰ Women being an important part of economy still faces the harsh side of society where not only women, but men are also not treated equally because of the nature of work they do. The unskilled and unorganized sector not only lacks in the economical aspect but also in terms of basic equality among law. The physical work where women are treated merely as a very cheap labor and paid accordingly, especially during menstruation or reproduction their productivity even decreases more which creates a conflict between the workers and the other stake holders, as they do not willingly hire a woman for work.

The women during the time of menstruation while working on the sugarcane farms carry heavy bundles of sugarcane towards the vehicle where it need to be loaded. It is difficult for those women to carry those bundles.³¹ The right of equality or the right of dignity is often compromised in these cases where they are bound by the economic pressure as well as the family pressure to work for long hours to earn their livelihood. The cases where women are not healthy or has some problem could think about hysterectomy, however only for the sake of working in the sugarcane farming it becomes a way for the invitation of ill health and other several health discomforts. Hysterectomy is not just a medical procedure it is a decision for lifetime which could affect life of a women and

²⁸ Manjari Sinha et al., Medicalisation of Hysterectomy: A Qualitative Inquiry, [SAGE Journals](https://doi.org/10.1177/23938617251380001) (2025) <<https://doi.org/10.1177/23938617251380001>>.

²⁹ Rasandeep Kaur Phull, Mass Womb-icide: Why Are Maharashtra's Female Sugarcane Labourers Paying for Expensive Hysterectomy?, (2023) <https://waseda.repo.nii.ac.jp/record/77559/files/JisedaiRonsyu_6_4.pdf>.

³⁰ Amrut Arun Swami, Hysterectomies and bodily autonomy in female migratory farm laborers in the unorganized labor sector in Beed district of Maharashtra: A Review Article, (2022) <[June 2022.cdr](#)>.

³¹ Saroj Shinde, Insights on the Practice of Hysterectomy among the Women Sugarcane Cutters in Maharashtra (India), (2022) <[140.pdf](#)>.

her bodily autonomy. The fundamental rights get violated even after knowing that these violations can lead to serious social injustices towards women.

LEGAL FRAMEWORK TOWARDS GENDER JUSTICE

Gender justice refers to the elimination of any kind of inequality or discrimination among genders with context to rights and opportunities. Gender justice is beyond formal equality and promotes substantive equality, so that equality works as an outcome and not merely of opportunity.³² The structural inequality faced by women is often addressed by promoting substantive equality. To ensure fairness and equality among all genders to ensure justice. The power imbalances and structural inequality that leads to gender injustice. The intersection of rights based on reproductive justice and menstrual justice leads to the broader concept or framework of gender justice. Discrimination arises out of the patriarchal mindset and the deep-rooted structures of society. The freedom of bodily autonomy, freedom against discrimination and violence and freedom of access to health and opportunities promote gender equality and gender justice.³³ Justice works as a broader framework of rights and equality. To ensure justice there must be rights and duties of the individuals.

The legal framework for promoting gender justice is enshrined under the Constitution of India, promoting equality, fairness and justice.³⁴ The Constitution of India and judiciary have a pivotal role for promoting gender justice.³⁵ The Constitution of India under part III entitles the individuals with certain rights that act as the bridge towards justice and equality. The article 15 of the Indian Constitution “*prohibits the discrimination by the state on the grounds of caste, class, gender, religion and place of birth*”.³⁶ The fundamental right which is core of the Constitution which provides the rights against discrimination. Further, article 16 and 21 which suggest “*equality of*

³² Sandra Fredman, Substantive equality revisited, International Journal of Constitutional Law, Volume 14, Issue 3, (2016) <[Substantive equality revisited | International Journal of Constitutional Law | Oxford Academic](#)>.

³³ Bibhanshu Mishra, Right to equality and gender justice in India, Vol. 15 No.1, (2022) <[Right-to-Equality-and-Gender-Justice-in-India.pdf](#)>.

³⁴ N.S Ambedkar, Upholding gender equality: The role of the Indian Constitution, Volume 14, Special issue 5, pp. 136-138, (2024) <[IJIPAR Vol 14 SI 5 May 2024.pdf](#)>.

³⁵ Gyan Chand Yadav, Constitutional Safeguards and the Pursuit of Gender Justice in India, Vol.11, No.4, (2025) <<https://doi.org/10.5281/zenodo.18213243>>.

³⁶ Article 15, The Constitution of India 1950

opportunity among all”³⁷ and “*right to life with dignity*”.³⁸ These fundamental rights ensure dignified and equal treatment among all. Article 21 which guarantees right to life with dignity and liberty also ensure the right to bodily autonomy and guaranteeing reproductive justice and menstrual justice could not be possible without considering article 21 as the core of the gender justice.

The rights under Indian Constitution evolved by time and suggested a more equitable life for all the individuals. The judiciary ensured justice by uplifting the constitutional values through the judgements pronounced. The leading case of Indian Judiciary for promoting gender Justice was *Air India v Nargesh Meerza*,³⁹ where Supreme court struck down the discriminatory practice of services conditions for the air hostess, where it was a landmark judgement stating these kinds of practices are violative of article 16 of the Indian Constitution. It was a judgement based on right to equality and to promote gender equality at workplace.

Similarly, there were other evolution of cases for the purpose of promoting equality and justice, as in the landmark judgement of *Suchitra Shrivastava vs Chandigarh Administration*,⁴⁰ was the basis of reproductive justice. Wherein the case directs that reproductive justice is enshrined in article 21 of the Indian Constitution to choose for our own bodily autonomy. The Supreme of court recently delivered a judgement and included menstrual hygiene and health as part of Article 21 right to life with dignity.⁴¹ These judgements played a pivotal role in shaping gender justice.

SUGGESTIONS

The paper provides for the suggestions that can be incorporated in policy making and implementation:

1. Policy framework and legislation: The government should consider the sugarcane workers specially the women human rights to be protected by incorporating certain policies and by

³⁷ Article 16, The Constitution of India 1950

³⁸ Article 21, The Constitution of India 1950

³⁹ *Air India v Nargesh Meerza*, AIR 1981 SC 1829

⁴⁰ *Suchitra Shrivastava vs Chandigarh Administration* AIR 2010 SUPREME COURT 235

⁴¹ Bandhan Kumar Verma, Menstrual Health and Hygiene Are Fundamental Rights: A New Dimension Of Article 21, Live Law <<https://www.livelaw.in/articles/menstrual-health-hygiene-fundamental-rights-521851>>.

adding a new dimension to the definition provided in section 2(l), 2(m) and 2(n) of The Unorganized Workers' Social Security Act, 2008.

2. Laws for women workers in unorganized sectors: there is no comprehensive law that governs women of unorganized sector specially at the farming sector. The well-being of women workers should consider women for its implementation under the Agricultural Produce Committee Act, 2013.
3. The State should conduct awareness camps in the rural areas to educate women regarding their rights during menstruation and reproduction collaboration with other organizations.

CONCLUSION

The intersection of reproduction and menstruation is an urgent need for the visible scenario of the Beed district, Maharashtra. The financial constraints, lack of legislation, lack of healthcare facilities, labor injustices and the structural inequality as played a role in the increased number of hysterectomies in the Beed district, which is violative of fundamental right and in broader context human rights. The Sugarcane workers who are less educated and need to provide advocacy to the workers so that they can enjoy their right of bodily autonomy, and human rights. Menstruation needs to be addressed within the broader context of reproduction, as the study of Beed district highlights the need of women to understand their bodily autonomy, by addressing the factors such as class, caste and gender. The Case study of Beed district finds out that the forced hysterectomy highlights the gap in the healthcare sector and the administration governing the sugarcane workers of the district. Increased hysterectomy is not only failure in part of health; however, it violates fundamental rights of women under Part III of the Indian Constitution, and which guarantee the citizen to enjoy their rights as they please. The paper demonstrates the need for the timely intervention of laws in the governing of menstruation rights within the purview of reproductive rights which need a comprehensive policy focusing on socio-economic justice. The case of Beed district is not merely about health of women workers but is a social and economic pressure that reflects the structural gender injustices which somehow force women to sacrifice their bodily autonomy for their families.