

Abstract

WHETHER THE LAW TO DEAL WITH THE GROWING PROBLEM WITH NRI MARRIAGES IN INDIA IS EFFICIENT ?

In the last decade, India has started facing a new evil in the sacred institution of marriages. The ever-increasing number of fraud in NRI marriages has struck the society hard. Therefore, the government constituted an expert committee in order to address this new evolving problem in NRI marriages, which submitted its report in November 2017. Based on the various suggestions of the committee, Integrated Noday Agency (INA) was set up, headed by Ministry of Women and Child Development with senior officials from Ministries of External Affairs, Home Affairs, Law and Justice and Women and Child Development as its members. The INA has held several meetings and has taken various actions in this regard. But on considering the entire issue, what it has done is a drop in the ocean. Ministry of External Affairs presented a bill on mandatory Registration of NRI marriages which is pending in Rajya Sabha. It has been referred to a standing committee. It also intends to amend the Passport Act, 1967, and the Code of Criminal Procedure, 1973. Since, the evils of this problem is trans-national, it requires international level agreements. For example, some of the states in United States have “no-fault divorce” policy which makes it very easier for the spouse to get divorce. In such situations where NRI husband obtains an ex-parte divorce decree in a foreign court, the Indian spouse is left remediless. Therefore, various steps are to be taken in order to address the issue in an effective manner, which should start even before marriage takes place so that the bride has sufficient accurate information about the groom before getting married. There should be stronger and more effective coordination between agencies at national and international level.

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Introduction :

Marriages in India is a sacrosanct union. It is also an important social institution. Marriages in India are between two families, rather two individuals, arranged marriages are customary. The society as well as the Indian legislation attempt to protect marriage. In the 21st century, it has become dream of every Indian to marry an individual working in a foreign nation and to settle in abroad. In order to fulfil this dream, they marry an NRI. With the ever-growing number of NRI marriages, the problems revolving in an NRI marriage has also grown and has become a matter of great concern for the country. In order to understand and evaluate the law governing NRI marriages and the law addressing the issues, it of utmost importance to understand the problem itself.

Non-Residential Indians across the globe :

Indian diaspora has presence in almost every nation of the world. As on December 2018, there are 13,113,360 Non Residential Indians (NRIs) and 17,882,369 Persons of Indian Origin (PIOs) living outside India, making it a total of 30,995,729 Overseas Indians. When 30,995,729 Overseas Indians spreading 208 countries practicing different religions involve in legal battle, how difficult it is to reach ultimate destination of justice more particularly when they have no special laws and procedures.¹

NRI Marriages :

Many a man and woman of this land with different personal laws have migrated and are migrating to different countries either to make their permanent abode there or for temporary residence. Likewise there is also immigration of the nationals of other countries. The advancement in communication and transportation has also made it easier for individuals to hop from one country to another. It is also not unusual to come across cases where citizens of this country have been contracting marriages either in this country or abroad with nationals of the other countries or among themselves, or having married here, either both or one of them migrate to other countries. There are also cases where parties having married here have been either domiciled or residing separately in different foreign countries. This migration, temporary or permanent, has also been giving rise to various kinds of matrimonial disputes destroying in its turn the family and its peace.²

‘NRI marriages’ generally means a marriage between an Indian woman and an Indian man who is residing in another country (NRI- non-resident Indian), either an Indian citizen (when he

¹ https://mea.gov.in/images/attach/NRIs-and-PIOs_1.pdf

² Y. Narasimha Rao vs. Y. Venkata Lakshmi, JT 1991 (3) SC 33

would legally be an 'NRI') or as citizen of foreign country (when he would legally be a PIO- Person of Indian Origin).

There is no official record of total number of NRI marriages taking place in the country in a year. But the growing number of NRI Marriage complaints is a testimony to the existing crisis. The Ministry has been receiving petitions from Indian women about fraud cases of NRI marriages. In the year 2017 (upto Nov.), it received 1022 petitions compared to 1510 in 2016 & 796 in 2015. Of 3328 complaints received during the last three years (January 2015 to November, 2017) from distressed Indian women deserted by their NRI spouses, this Ministry has addressed 3268 complaints by way of providing them counseling, guidance and information about procedures, mechanisms for serving judicial summons on the Overseas Indian husband; filing a case in India, issuing Look Out Circulars; getting access to lawyers and NGOs empanelled with Indian Missions etc.³

Identifying the problems in NRI marriages :

The major issues and challenges faced by women trapped in these deceptive NRI marriages are the unawareness about the possibility of being abandoned by their husband right after marriage, when refuses to take her along with him. Women mostly suffer when the husband takes advantage of lenient grounds for divorce in other legal systems, where the women have nowhere to go. The following are some of the issues in the NRI marriages.

- i. Woman married to an NRI who is abandoned even before being taken by her husband to the foreign country of his residence.
- ii. Woman brutally battered, assaulted, abused both mentally and physically, malnourished, confined and ill treated and forced to flee or was forcibly sent back.
- iii. A quick engagement, followed by a massive wedding, a huge dowry and a honeymoon, after which the NRI husband flies out of India while the wife waits for her visa.
- iv. The menace of 'honeymoon brides' is a big problem to deal with as over 20,000 brides have not seen their husbands after their honeymoon.
- v. Woman who reached the foreign country of her husband's residence and waited at the international airport there only to find that her husband would not turn up at all.
- vi. NRI husband was already married in the other country to another woman.⁴
- vii. Husband had given false information on any or all of the following: his job, immigration status, earning, property, marital status and other material particulars, to con her into the marriage.
- viii. Woman who approached the court, either in India or in the other country, for maintenance or divorce but repeatedly encountered technical legal obstacles related to jurisdiction of courts, service of notices or orders, or enforcement of orders or learnt of the husband commencing simultaneous retaliatory legal proceeding in the other country.

³ MEA | E-citizen/RTI : Parliament Q & A : Lok Sabha. (n.d.). Retrieved March 15, 2019, from [https://www.mea.gov.in/lok-sabha.htm?dtl/29420/QUESTION NO917 NRI MARRIAGES](https://www.mea.gov.in/lok-sabha.htm?dtl/29420/QUESTION%20NO917%20NRI%20MARRIAGES)

⁴ Dhanwanti Joshi vs. Madhav Unde (1998) 1 SCC 112

Most petitions received in cases of NRI Marriages pertain to:

- i) Harassment and ill-treatment by the husband and his family;
- ii) Loss of communication with the spouse after he goes abroad;
- iii) Request for assistance in serving judicial summons for Court proceedings in India;
- iv) Assistance in obtaining maintenance and child support from the spouse;
- v) Request for revoking and impounding passports of the spouse;
- vi) Request for repatriation of the spouse to India; and
- vii) Child-custody issues.

In *Smt. Anubha v. Vikas Aggarwal*⁵, this Court relying upon the decision of the Supreme Court in the case of *Y. Narasimha Rao and Ors. vs. Y. Venkata Lakshmi and Anr.*⁶, held that as laid down by the Supreme Court, the first and foremost requirement of recognising a foreign matrimonial judgment is that the relief should be granted to the petitioner on a ground available under the matrimonial law under which the parties are married, or where the respondent voluntarily and effectively submits to the jurisdiction of the forum and contests the claim which is based on a ground available under the matrimonial law under which the parties are married.

In another case in Calcutta High Court, *Dipak Banerjee vs. Sudipta Banerjee*⁷ the husband questioned the jurisdiction of Indian court to entertain and try proceedings initiated by wife under Section 125 for maintenance, contending that no Court in India had jurisdiction in international sense to try such proceeding as he claimed to be citizen of United States of America and his wife's domicile also followed his domicile. The Court held that where there is conflict of laws every case must be decided in accordance with Indian Law and the rules of private international law applied in other countries may not be adopted mechanically by Indian courts. The Court felt that keeping in view the object and social purpose of Sections 125 and 126, the objection raised by husband was not tenable and the jurisdiction of Indian Court was upheld as it was the court within whose jurisdiction she ordinarily resided.

Legal Mechanism in place to solve the Problem

A. Integrated Nodal Agency:

Ministry of External Affairs, Minister of Women & Child Development and Minister for Law & Justice have come together in order to solve the growing problems of NRI marriages as it involves inter-ministry issues. In this direction, they have formed an Integrated Nodal Agency (INA)⁸ is to discuss regularly all issues related to NRI Marital disputes to safeguard the interest of such women. As a part of such decisions, consequential action will also be taken including possibility of revocation/impounding of passport. All the NRI marital dispute cases are to be

⁵ AIR 2003 Delhi 175

⁶ (1991) 3 SCC 451

⁷ (1987) CALLT 491 (HC)

⁸ (n.d.). Retrieved March 20, 2019, from <http://www.pib.nic.in/Pressreleashare.aspx?PRID=1539360>

forwarded by all the ministries to the National Commission for Women (NCW) for scrutiny. After scrutiny of NCW, dispute cases would be recommended to INA to consider issuing Look-Out Circulars (LoC).

B. Registration of Marriages by Non-Resident Indians:

Ministry of External Affairs has introduced *The Registration of Marriage of Non-Resident Indian Bill, 2019*⁹ in Rajya Sabha which mandates mandatory registration of NRI marriages with penal consequences for non-registration. The Bill states that every NRI who marries a citizen of India must get his marriage registered in India within thirty days. Further, every NRI who marries an Indian citizen or another NRI outside India, must get his marriage registered with the Marriage Officer, within thirty days. The Marriage Officer is appointed from among the diplomatic officers in the foreign country. The bill has been referred to Standing Committee for further deliberation and to submit a report within in three months.¹⁰

C. Serving of summons :

The biggest problem one has to face in legal proceedings is serving of summons and notices. Since the bride is residing in India, she would have no first hand information about address particulars of her husband's residence and workplace. Since these NRI grooms not working as permanent employees, the change of employment as well as abode is frequent. And therefore, tracing their address particulars is one of the biggest challenges they face. Unless the notices and summons are served on them, it will not be possible to proceed further. For serving summons on NRIs the summons has to be sent to ministry of home affairs. As per section 105 of CrPC, the government has to make reciprocal arrangements regarding serving of process accordingly the central government has entered Mutual Legal Assistance Treaty (MLAT) with 39 countries¹¹ and also issued comprehensive guidelines. Due to entering such MLAT the said country has obligation to reciprocate with serving of notices and summons warrants etc whereas the other countries have no obligation to consider such request.

The Registration of Marriage of Non-Resident Indian Bill, 2019 provides that in case a court cannot serve summons, it may issue summons by uploading it on a specific website designated by the Ministry of External Affairs. If the person summoned does not appear before the Court, it may issue and upload a warrant for arrest on the designated website. Further, in the case the person fails to appear before the Court as specified in the warrant, the Court may pronounce him as a proclaimed offender and upload a declaration to that effect on the website. If the accused does not appear after the proclamation has been uploaded, the Court may issue a written statement that the such a proclamation has been uploaded. This statement will be conclusive evidence that the warrant has been issued

⁹https://www.prsindia.org/sites/default/files/bill_files/Registration%20of%20Marriage%20of%20NRI%20Bill%2C%202019.pdf

¹⁰ The Registration of Marriage of Non-Resident Indian Bill, 2019. (2019, February 21). Retrieved March 23, 2019, from <https://www.prsindia.org/billtrack/registration-marriage-non-resident-indian-bill-2019>

¹¹ MEA | MLAT- Criminal. (n.d.). Retrieved March 23, 2019, from <https://www.mea.gov.in/mlatcriminal.htm>

D. Impounding of Passport :

In case an NRI marries an Indian citizen or another NRI, and fails to register the marriage within thirty days, the passport authority may impound or revoke the passport of the NRI.

E. Financial & Legal Assistance :

With an aim to provide financial and legal assistance to distressed women married to NRI spouses by all Missions and Posts, the Indian Community Welfare Fund (ICWF) Guidelines were revised in September 2017. The amount of legal & financial assistance to distressed Indian women has also been increased from US\$ 3000 to US\$ 4000 per case, and it is applicable to all overseas Indian Missions and Posts. The assistance is released to the empanelled legal counsel of the applicant or Indian Community Association/ Women's Organisation/ NGO concerned to enable it to take steps to assist the woman in documentation and preparatory work for filing the case.

There is also a provision in the revised ICWF guidelines for maintaining a panel of 3-5 local lawyers/firms proficient in local language and law, and who enjoy credibility and have commitment and experience to assist deserving Indian national in distress in Gulf Cooperation Countries (GCC) and Top 20 countries with major Overseas Indian national population.

F. Mediation Cell for cases of child custody dispute in NRI marital discord

The Women and Child Development Ministry, in pursuance to the power conferred under Section 13(a) of the Commission for Protection of Child Rights Act (CPCR) 2005, has directed the National Commission for Protection of Child Rights (NCPCR) to constitute a Mediation Cell, to resolve the cases of children who were taken away by one of the spouse without the permission of the other spouse due to marital discord or domestic violence from overseas country to India or vice versa and prepare parental plan taking into account the best interest of the child.¹²

The suggested composition of the Mediation Cell in NCPCR is as follows:

- I. Chairperson NCPCR- Chairperson
- II. Member NCPCR (in that fields of laws relating to children)- Member
- III. Member NCPCR (in field of child psychology-sociology) - Member.

Further, the ministry has notified that any parent can approach the Integrated Nodal agency, set up to resolve the NRI marriages issues, with the details of the case. A representation could also be made by the child or a custodian of the child. With this procedure, the scope of work of the INA is being expanded to cover cases involving children of contesting parents. Mediation process may be completed in six months of the receipt of application filing which the Mediation process will be taken as over.

¹² Exec. Order No. 31/59/2016/-CW-1, 3 C.F.R. 7 (27) <http://www.wcd.nic.in/sites/default/files/SCAN0110.pdf>

As per laid own procedure, the INA will refer the matter to NCPCR which will undertake mediation so that all aspects of the case could be tabled from both the sides. Participation by Video conferencing is also permitted. Either of the parents, who is normally a resident of a foreign country, could also get the local Mission of that country involved in the mediation process, if required. The Mediation Cell of NCPCR will develop a parental plan keeping in view the interest of the child and submit its report to the INA. Based on the report of the INA and any other inputs that INA may seek from the applicants or from MHA/MEA, it will pass a speaking order in the matter. The proceedings of the INA shall not be treated as interference of the Court proceedings which may have been initiated by either of the parents in any jurisdiction.

The purpose of this procedure is primarily to bring all the facts of the case including the legal proceedings that may have been initiated either by the parties, make an overall assessment of the situation and suggest a parental plan in the best interests of the child. Further, mediation by NCPCR is stated result in resolution of most of the cases which will be a big relief to both the parties and particularly to the children.¹³

View taken by Supreme Court :

To impress upon the need and necessity for appropriate steps to be taken in this direction to safeguard the interest of women. Although it is a problem of private International Law and is not easy to be resolved, but with change in social structure and rise of marriages with NRI the Union of India may consider enacting a law like the Foreign Judgments (Reciprocal Enforcement) Act, 1933 enacted by the British Parliament under Section 1 in pursuance of which the Government of United Kingdom issued Reciprocal Enforcement of Judgments (India) Order, 1958. Apart from it there are other enactments such as Indian and Colonial Divorce Jurisdiction Act, 1940 which safeguard the interest so far United Kingdom is concerned. But the rule of domicile replacing the nationality rule in most of the countries for assumption of jurisdiction and granting relief in matrimonial matters has resulted in conflict of laws. What this domicile rule is not necessary to be gone into. But feasibility of a legislation safeguarding interest of women may be examined by incorporating such provisions as-

- (1) no marriage between a NRI and an Indian woman which has taken place in India may be annulled by a foreign court;
- (2) provision may be made for adequate alimony to the wife in the property of the husband both in India and abroad.
- (3) the decree granted by Indian courts may be made executable in foreign courts both on principle of comity and by entering into reciprocal agreements like Section 44A of the Civil Procedure Code which makes a foreign decree executable as it would have been a decree passed by that court.¹⁴

Suggested Measures in order to solve the menace existing in NRI Marriages :

¹³ (n.d.). Retrieved March 23, 2019, from <http://pib.nic.in/newsite/PrintRelease.aspx?relid=181332>

¹⁴ Neeraja Saraph vs. Jayant V. Saraph and Ors. (1994) 6 SCC 461

- i. Simplification of procedure for quick issuance of visa by foreign Missions in India to deserted women to enable them to contest the proceedings filed by NRI / PIO husband in a foreign land.
- ii. Introduction of a system of cross check / consent, when a NRI/PIO husband wants to cancel sponsorship of his spouse's visa. Cancellation should not be permitted as long as dependency of the aggrieved women continues as per Indian law so as to enable her to continue to stay and contest proceedings in the foreign land without being deported and thus deprived of the opportunity to contest the case.
- iii. Grant of ex-parte divorce by foreign courts be barred in the case of marriages solemnized in India as per Indian law.
- iv. Procedural delay/low priority to issue LOC/RCN against accused NRI/PIO husband in cases of marital discord needs to be addressed.
- v. Cases of domestic discord to be included in the scope of extradition treaties. (219th Report of the Law Commission recommends inclusion of cases of domestic discord within their scope).
- vi. Difficulty and consequent delay in serving judicial processes issued by Indian courts through the Indian Missions abroad to be addressed.
- vii. Simplification of procedure to facilitate extradition/deportation of errant husband and cancellation of passport to face civil/criminal trial in India especially if judicial processes of Indian courts are not responded to.
- viii. Need to develop mechanisms to enable quick tracking of NRIs/PIOs in case of desertion. Funds may also need to be allocated for location of such persons through agencies available for the purposes.
- ix. Recognition of NCW as an authorized body to directly make applications before foreign courts and foreign missions on behalf of aggrieved women where so required.
- x. Building awareness.
- xi. Designating nodal officers/department for dealing with NRI issues.
- xii. Sensitization of police and authorities for registration of FIR & other NRI issues.

Suggestions mooted for solving the existing family law problems posed before NRIs :

In the context of the NRI, the following suggestions are mooted for improving the existing family law problems posed daily before NRIs and faced by affected people resident in India when they come in contact with NRIs. The solutions partly exist in proper implementation of existing laws, framing of proper regulations, creation of Family Courts and Fast-track Courts and amendment of existing legislation. The six point charter summary is set down as hereunder in the following sequence:

A. Registration of marriages must be made compulsory.

*The Registration of Marriage of Non-Resident Indian Bill, 2019*¹⁵ should be implemented at the earliest. It will help the bride as well as the groom to know detailed information about the other. This will in turn ensure compliance of conditions of a valid marriage, provide proof of marriage and act as a deterrent for bigamous practices. Section 8 of the Hindu Marriage Act, 1955 makes

¹⁵https://www.prsindia.org/sites/default/files/bill_files/Registration%20of%20Marriage%20of%20NRI%20Bill%2C%202019.pdf

it optional for State Governments to provide for rules for providing for registration of marriages. Simultaneously, it should be made obligatory that the NRI spouse must give intimation of registration of his marriage to the concerned Embassy / High Commission in India, in which country he is presently resident.

23B. Dissolution of marriage on the ground of breakdown of marriage as an additional ground for divorce

It should be introduced when at least one of the spouses is an NRI subject to safeguards provided by legislation. This would require amendment of the provisions of the Hindu Marriage Act, 1955 and the Special Marriage Act, 1954. Such a ground would provide NRI spouses a judicial forum in India to seek a remedy on Indian soil rather than importing foreign judgments of alien courts on breakdown grounds and give a chance to the Indian spouse to defend on convenient and equitable terms in Indian courts. The need for this amendment must be strongly mooted by the States with high NRI population to the Government of India to enact appropriate legislation by suitable amendments in the existing Hindu Marriage Act, 1955 and Special Marriage Act, 1954 since inter-country migration from such States is significant and in large numbers.

The Commission has recently recommended in its 217th Report as to incorporation of "irretrievable breakdown of marriage" as a ground for divorce in the said Acts. Further, the Law Commission in its 65th Report on "Recognition of Foreign Divorces" (1976) made a radical departure in suggesting that, in considering the questions about the recognition of foreign decrees of divorce, our courts should base their decisions not only on the question of domicile, but also on the basis of habitual residence and nationality.¹⁶ The said Report also considered the problem about the ancillary orders passed by the foreign courts in dealing with matrimonial proceedings and on this matter, the conclusion of the Commission was that these ancillary orders should not be treated as binding by our courts even though the foreign decrees of divorce are recognized. These ancillary orders concern the custody of children and other allied questions, and it was felt that it would be juristically imprudent to treat them as binding. The Commission had appended a Bill entitled "The Recognition of Divorces and legal Separation Bill, 1976" with the said Report to give shape to its recommendations.

C. To provide for provisions for maintenance and alimony of spouses, child custody and child support as also settlement of matrimonial property.

Wherever one of the spouses is an NRI, parallel additions must be made in the Hindu Marriage Act, 1955 and the Special Marriage Act, 1954 to provide for provisions for maintenance and alimony of spouses, child custody and child support as also settlement of matrimonial property. This will ensure that the spouse / children on Indian soil are maintained and provided for in accordance with the income and standard of the NRI spouse in the foreign jurisdiction. It may also be worthwhile to suggest that under section 3 of The Family Courts Act, 1984, the

¹⁶ Law Commission of India. 1976. *Recognition of Foreign Divorces. rep.* Retrieved March 27, 2019 (<http://lawcommissionofindia.nic.in/51-100/report65.pdf>).

respective State Governments where Family Courts have not been established should be directed to provide for Family Courts. The States with high NRI population which essentially needs Family Courts as a matter of dire urgency should immediately create such Courts to deal with family law problems and give priority to settlement of family law issues where parties are NRIs.

D. Simplification of procedure of succession, transfer of property, making /execution / implementation of wills, repatriation of NRI funds

In the matters of succession, transfer of property, making /execution / implementation of wills, repatriation of NRI funds, the respective State Governments must simplify and streamline procedures. Ideally speaking, in matters having property problems, Fast-track Courts must be set up to deal with such cases expeditiously in accordance with a time bound schedule. The Punjab Government has made amendments in The East Punjab Rent Restrictions Act and the Punjab Security of Land Tenures Act for the summary trial of disputes regarding agricultural, commercial and residential property. However, no special Fast-track Courts exist in most States with high NRI population to settle these matters on priority. A fresh proposal should be mooted to set up such courts as soon as possible.¹⁷

E. In the area of inter-parental child abduction or removal of children to India from foreign jurisdictions against court orders, India must become a signatory to the Hague Convention on the Civil Aspects of International Child Abduction, 1980. As of now, there is no international convention or treaty applicable in India since India is not a signatory to the said Convention and other than conventional procedures, there are no remedies for enforcing such rights. Till such time there is no signing of such treaty, the State Governments with high NRI population should permit liaison with foreign missions in India through whom courts should be assisted to ensure return of children to the country of their foreign residence if they are removed in violation of foreign court orders. The administrative and police authorities in Indian States with high NRI population should give some uniform guidelines to observe to assist such parents in distress who often land in such States in India with no clue as to whom to approach for assistance. The Commission has already recommended in its 218th Report as to the need to accede to the said Convention of 1980.¹⁸

F. Inter-country child adoption procedures must be simplified and a single uniform legislation must be provided for in matter of adoption of Indian children by NRIs. This should be hedged with ample checks and safeguards but at the same time should provide a unified, straightforward and single agency procedure. The present system is lengthy, complicated, involves multiple agencies, is very time consuming and thus needs to be suitably amended. Further, again the States in India with high NRI population should lay down some uniform policy guidelines to be observed by State agencies, adoption homes and administrative

¹⁷ Essays, UK. (November 2013). The Common Issues Present In The Nris Marriages Law Family Essay. Retrieved from <https://www.uniassignment.com/essay-samples/law/the-common-issues-present-in-the-nris-marriages-law-family-essay.php?vref=1>

¹⁸ Law Commission of India. 2009. *Need to Accede to the Hague Convention on the Civil Aspects of International Child Abduction (1980)*. rep. Retrieved March 28, 2019 (<http://lawcommissionofindia.nic.in/reports/report218.pdf>).

authorities so that proper help and guidance is available in adoption matters. The Law Commission in its 153rd Report on "Inter-country Adoption" prepared draft of a Bill on Inter-country Adoption. India has also ratified the Convention of 29 May 1993 on Protection of Children and Co-operation in Respect of Intercountry Adoption.¹⁹ Thus a simplified law should be enacted on the subject in the light of this Convention.

The above changes can be made either by providing a new composite legislation for NRIs or suitable changes can be made in existing legislations for streamlining the laws and procedures. It is suggested that a core committee of specialists in the field of Private International Law should be constituted at the earliest to prepare a comprehensive draft to suggest the said changes in legislation in the best possible way. It is the endeavour of the Law Commission to suggest to the Government of India to do whatever possible to improve the life of the NRIs in India. It is important to see what India can do for the NRI and not what the NRI can do for India

Conclusion:

The Government in the last couple of years is working proactively in order to solve the crisis in NRI marriages and has framed a draft bill for mandatory registration of marriages. The measure being taken by government are very important yet there needs to be more proactive approach in coordination between the ministries at the national level and between nations at the international level.

¹⁹ Law Commission of India. 1994. *Inter Country Adoption. rep.* Retrieved March 30, 2019 (<http://lawcommissionofindia.nic.in/101-169/report153.pdf>).