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BEFORE THE MADURAI BENCH OF MADRAS HIGH COURT

**DATED: 16-11-2026**

CORAM

**THE HON'BLE MR. JUSTICE G.R.SWAMINATHAN**

**AND**

**THE HON'BLE MRS.JUSTICE M.D.SUMATHI**

**CONT P(MD) No. 3763 of 2026**

CNR:{HCMD011622922026}

Ramasubbu
S/o. Late S. Vijayakumar,
Door No.8/18C,
Sri Sakthi Nagar,
Krishnapuram,
Tirunelveli District -627 011.

..Petitioner(s)

Vs

1. K.Gopal, IAS,
   The Secretry to Government,
   Department of Higher Education,
   Secretariat,
   Fort St.George,
   Chennai.

2. R.V.Shajeevana IAS,
   Director of Public Libraries,
   Public Libraries Directorate,
   737/1, Anna Salai,
   Chennai -600 002.

..Respondent(s)

Prayer : Contempt Petition filed under Section 11 of the Contempt of Courts Act, 1971 to initiate contempt proceedings against Respondents 1 and 2 for their wilful deliberate, and contumacious disobedience of the



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directions issued in the Judgment dated 19.06.2024 in W.P. (MD) No. 10150 of 2019 and punish the contemnors/respondents in their personal and official capacities with maximum imprisonment and fine.

For Petitioner(s): Mr.K.P.S.Palanivel Rajan,
for Mr.P.M.Vishnu Varthanan

For Respondent(s): Mr.Vijay Narayan,
Advocate General,
assisted by,
Mr.P.V.Balasubramanian,
Additional Advocate General,
&
Mr.B.Saravanan,
Additional Advocate General,
assisted by,
Mr.M.Kannan,
Special Government Pleader.

Mr.R.John Sathyan,
State Public Prosecutor,
assisted by,
Mr.D.Venkatesh,
Additional Public Prosecutor.

**ORDER**

**(Order of the Court was made by G.R. SWAMINATHAN J.)**

Heard the learned Senior counsel for the petitioner and the learned Advocate General, Additional Advocate Generals and the learned State Public Prosecutor.



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2. This morning we had posed the following queries:-

i) Procurement of books has been categorised into two. a) General and b) special. Procurement for Periyar Arivulagam was under the special category. It may be clarified whether the same principles and conditions governing general procurement was applied to special procurement also.

ii) How many days were taken to select and procure the books for Kalaignar Library, Madurai and Periyar Arivulagam?

iii) How many books were procured for Kalaignar Library, Madurai (January to December, 2025) and Periyar Arivulagam?

iv) When procurement was made in two stages under the Transparency Rules, how many books were rejected by expert committee? How many books rejected by the expert committee were procured for Periyar Arivulagam?

v) How many books were recommended by the 137-member expert committee? What was the time granted for this process? How many books were procured?

vi) It was submitted on the last occasion that Agalvilakku submitted 2300 and odd titles and that 1700 were selected and procured. Who rejected the 600 titles of Agalvilakku and at what stage? What was the reason for such rejection? Copies of the minutes to be made available. If 600 titles of a publisher could be rejected, what made the officials to select and purchase the remaining 1700?

vii) How many English books were purchased for Periyar Arivulagam? Whether directly from publishers or from book



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sellers? What was the budget allotted for English books and Tamil books respectively? Has the entire budget amount has been utilised?

viii) Was the work of the librarians who were appointed as Nodal and Coordinating Officials overseen by the Director of Public Libraries and School Education Secretary? Were the files perused by them? Did the Secretary issue any written instruction?

ix) How many books were ***not*** procured even though they were recommended by the expert committee? What were the reasons?"

3. When the matter was taken up for hearing in the afternoon, the learned Advocate General submitted that he would need some more time to respond. He assured this Court that all the persons involved in the scam will be dealt with. He added that five officials have already been suspended in connection with this scam.

4. The learned State Public Prosecutor submitted that pursuant to the departmental enquiry as well as the direction given by this Court, DVAC, Chennai City have registered FIR in Crime No. 4 of 2026 for various offences under the BNS as well as the Prevention of Corruption Act. Agalvilakku's Proprietor Mr.Mohan who figures prominently in the scam has been named as one of the accused.



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5. The learned Advocate General submitted that if any suggestion comes from this Court as regards streamlining the future procurement processes, that would definitely be considered by the Government.

6. Thiru. Badrinarayanan Seshadri of Kizhakku Padhippagam, who appeared and assisted this Court as a stakeholder, has sent us a note which has been enclosed with this order as Annexure 'A'. Two other stake holders who do not want themselves to be named have also placed their suggestions. They are enclosed as Annexures 'B' and 'C'. We expect and hope that the Government will go through all the three notes with utmost care and attention and respond on a positive note by the next hearing date. The earlier guidelines have been rendered toothless. It is time to evolve a foolproof procedure. Since the suggestions are fairly comprehensive, it should not take too long to issue a formal G.O so that we do not witness another scam in books procurement. Once such a binding procedure is put in place, we shall close this contempt petition. We would of course issue suitable directions.

7. We take judicial notice of the fact that library cess is levied and collected. We want to know if the cess amount so collected has been duly



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credited. We also want to know how the said amount has been spent so far. The affidavit to be filed by the authorities shall devote a paragraph to this aspect also. Some impleading applications have been filed. They will be considered on the next hearing date.

8. The Government would do well to undertake a detailed probe and come out with a statement by the next hearing date as to how procurement of books has taken place for the last twenty years and more. It would be in order if a **White paper** is submitted. The scam has shaken the conscience of the people of Tamil Nadu. Their faith in the system must be restored.

9. We have expressed such sentiments because two icons of Tamil Nadu, namely, **Shri.E.V.Ramaswamy(reverentially called as Periyar)** and **Shri.C.N.Annadurai** (**Arignar Anna)** have impressed upon us the importance of libraries and general reading. **Periyar** remarked as follows:-

> "Schools promote literacy and knowledge in a particular field. But the library fosters awareness of general knowledge in all spheres"
>
> **"பள்ளிக்கூடங்கள் எழுத்தறிவையும், குறிப்பிட்ட துறைகளில் அறிவையும் வளர்க்கின்றன. ஆனால், நூலகங்களோ அனைத்துத் துறைகளிலும் பொது அறிவை வளர்க்கின்றன."**



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**Anna** once famously remarked that the library should be accorded a place next to the basic necessities of life, in the following terms:-

**"வாழ்க்கையில் அடிப்படைத் தேவைகளுக்கு அடுத்த இடம் புத்தகச் சாலைக்கு தரப்படவேண்டும்."**

10. We are conscious that the Court should not direct the investigation officer to arrest any particular accused. But the case on hand falls under an exceptional category. The bogus publishers have already been identified. Or at least some of them. Unless they are custodially interrogated, one will never know how much money was paid to which public servant. The modus operandi must be brought out. Unlike the earlier scams, the present one rises not only on scale but also the manner in which it has been committed. For the first time, AI and digital processes have been subverted for achieving sinister ends. Of course, these matters fall within the realm of the police. We are sure that by the next hearing date, we will get a better picture.

11. Call this case on 20.11.2026 at 10.30 a.m., as first item.

**(G.R.S.,J.) (M.D.S.,J.)**
**16-11-2026**

PMU

Encl: Annexures A, B and C.



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To

1. K.Gopal, IAS
   The Secretry to Government
   Department of Higher Education
   Secretariat
   Fort St.George
   Chennai

2. R.V.Shajeevana IAS
   Director of Public Libraries
   Public Libraries Directorate
   737/1, Anna Salai
   Chennai -600 002



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Annexure - A

From

Badrinarayanan Seshadri
3A, Sri Gurukrupa Apartments
7/9, CP Ramaswamy Street
Abhiramapuram, Chennai 600018

To

HONOURABLE MR JUSTICE G.R. SWAMINATHAN AND
HONOURABLE MRS. JUSTICE M.D. SUMATHI
Madras High Court, Madurai Bench

Date: 13/11/2026

Sub: Concerns about procurement of books to public libraries in Tamil Nadu and how the process can be improved

Respected Justices,

1. I am Badrinarayanan Seshadri, publisher of Kizhakku Pathippagam, one of the leading Tamil publishers. I have been publishing books in Tamil since 2004. To this day, we have published more than 2500 Tamil titles, most of them non-fiction, covering biographies, political histories, current affairs, business, finance, economics, self-help, religion, healthcare, history, science and literature. We have also published some fiction, both short stories and novels.

2. I have a B.Tech from IIT Madras and a Ph.D from Cornell University (USA) in the field of Mechanical Engineering. I am a serial entrepreneur, and have run or am running multiple, successful businesses such as Cricinfo (1996-2005), Kizhakku Pathippagam (2004-), Synprosoft (2014-), Argee Staffing Services (2018-2022), Ascendency Interlinks (2023-), and Syncretic Media (2025-), in the space of cricket information, Tamil book publishing, software services on Zoho platform, IT staffing, BNI franchise and YouTube video content generation.

3. Under Kizhakku Pathippagam, I have not only published books, but also edited many of the titles, written a few books and translated some from English to Tamil. I have also devised strategies for selling these books across Tamil Nadu in every nook and corner including in restaurants, textile shops, supermarkets, grocery stores and even the petty shops and tea shops across small towns and



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villages. I have been the first to deploy all kinds of new technologies, namely audio books, Kindle e-books, print-on-demand etc.

4. We have always strived to bring the best books to Tamil and have bought translation rights to more than 200 English titles and published their Tamil translations. We have routinely commissioned Tamil books from reputed authors, in a variety of topics and we are proud of the easy readability we have brought into our books, as well as the attractive packaging, cover design, catchy titles, layout clarity etc.

5. We are an ethical publisher. We have never offered bribe in all these 22 years to anyone for the procurement of our books by the Dept of Public Libraries. We have always applied for all our titles and have fulfilled whatever orders we have received, however small they were, without ever complaining.

6. I have been observing the corruption and irregularities in the procurement of books for public libraries in Tamil Nadu for the last 22 years. Over this period, I have consistently voiced my concerns through my blogs, newspaper articles, public discussions and videos.

   The recent controversy involving the procurement of allegedly fraudulent, AI-generated and falsely attributed books published by Agal Vilakku and other publishers in large numbers for public libraries across Tamil Nadu has deeply disturbed me. It has once again demonstrated how public money can be diverted towards books of questionable authenticity and value, while genuine authors and publishers struggle to have their books acquired by public libraries.

7. To address the systemic flaws that have enabled such irregularities, I would like to offer the following suggestions.

   Many of these principles have already been articulated in the excellent judgment of the Hon'ble Madras High Court dated 19 June 2024 in **W.P.(MD) No. 10150 of 2019 — S. Krishnan vs. The Secretary to Government, Department of Higher Education**.

   That judgment directed the Government to implement its Transparent Book Procurement Policy, publish shortlisted books, invite public objections for one month, preserve those objections, and investigate past procurement irregularities.



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The subsequent orders dated 10 and 11 November 2026 in **Contempt Petition (MD) No. 3763 of 2026 — Ramasubbu vs. K. Gopal, IAS**, have further exposed the failure to implement these directions in letter and spirit.

Particularly relevant is the observation in the order dated 11 November 2026 that the Directorate should consider publishing a comprehensive record of books procured over the preceding two decades, including titles, quantities and payments. The Court also recorded the importance of disclosing the dates on which publishers submitted their bills and the dates on which payments were settled. Although the Court clarified that this was not yet a formal direction, it is an important recommendation deserving immediate attention.

I am therefore restating some of the Court's recommendations, while adding further suggestions to establish a fair, transparent, efficient and accountable procurement system.

# I. Transparency and Public Accountability

## A. Complete transparency in the selection process

The entire book selection process, beginning with the invitation for publishers to submit catalogues and books, through evaluation by subject experts, shortlisting, determination of quantities and final approval, must be completely transparent.

The names of the selection committee members, the criteria adopted for evaluating books, the individual and consolidated evaluation scores, and the reasons for selecting or rejecting books should be available for public scrutiny.

Where an official or committee changes the recommendation of an expert, that change must be documented with the reasons and the authority responsible.

The procedures prescribed in the 2024 S. Krishnan judgment should be fully implemented. Merely establishing an online procurement portal cannot be considered sufficient compliance unless the actual decisions made through that system are transparent.

## B. Public right to review and criticise book selections

As directed in the 2024 judgment, the complete list of shortlisted books, including their titles, authors, publishers, cover images, prices and proposed quantities, must be made available for public examination.



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The public, including readers, authors, publishers, librarians and subject experts, should be allowed at least one month to submit comments, criticisms and objections.

All such comments must remain publicly accessible and should never be deleted merely because they are critical of the Directorate or its decisions.

Before finalising procurement, the authorities should publish their responses to substantive objections, explaining why the relevant books have been retained, removed or otherwise reconsidered.

This will ensure that public consultation is meaningful rather than a procedural formality.

### C. Public disclosure of purchase orders, supplies and payments

The Directorate should maintain a publicly accessible database containing complete information about every book procured using public funds.

For every title, the database should disclose:

- ISBN, book title, author, publisher, edition and original publication year.
- Number of copies ordered and the libraries for which they are intended.
- Printed price, negotiated price, discount and total purchase value.
- Date of issue of the purchase order.
- Date of delivery and acceptance of the books.
- Date of submission of the publisher's or supplier's invoice.
- Date of approval and actual release of payment.

The proposed purchase orders should be published before final approval, and the final purchase orders, delivery records and payments should be disclosed as the procurement progresses.

**The information should be available in searchable and downloadable formats, including CSV or Excel, rather than only as scanned documents.**

**Historical disclosure:** The Directorate should also publish a consolidated database of book procurement for the preceding 20 years, to the extent that records are available, with missing records clearly identified.

This will make it possible to identify unusual procurement patterns, excessive concentration of orders among particular publishers, repeated purchases of the same books and preferential payment practices.



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In particular, allegations have been made that certain publishers, including Agal Vilakku, received preferential treatment both in the quantity of books ordered and the speed with which their payments were processed. Publication of the underlying records will help establish the facts objectively.

Such disclosure, by itself, can become one of the strongest safeguards against favouritism and corruption.

### D. Preservation of a complete digital audit trail

Every action performed through the book procurement portal must be preserved in a secure, tamper-evident digital audit trail.

This should include the original submissions made by publishers, expert evaluations, scores, recommendations, changes made by officials, approvals, purchase orders and payment authorisations.

No recommendation or score should be altered without preserving the earlier version, the identity of the person making the change, the date and time, and the reason for the modification.

Periodic independent technical audits should verify that the books finally ordered are the same books that were evaluated, shortlisted and approved through the prescribed process.

This would help prevent manipulation of procurement decisions after the expert evaluation stage.

## II. Institutional Accountability and Prevention of Corruption

### E. Disclosure of publisher ownership and conflicts of interest

Every publisher and distributor participating in library procurement should disclose the identity of its legal owners, beneficial owners, partners, directors and related publishing entities.

Where multiple publishing houses operate under different names but have common ownership or control, such relationships should be made public.

This is necessary to identify instances where the same individuals may be using multiple imprints to secure a disproportionate share of government procurement.



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Members of selection committees, expert panels and procurement authorities should also disclose material financial, professional or familial relationships with publishers, authors or distributors whose books they evaluate.

Persons having such conflicts of interest must recuse themselves from the relevant decisions.

Deliberate concealment of material relationships should attract appropriate disqualification and disciplinary consequences.

### F. Independent annual audit of procurement

There should be an annual independent audit of the entire book procurement process.

This audit should examine the selection of titles, compliance with evaluation procedures, quantities purchased, pricing, discounts, delivery records, payments and possible conflicts of interest.

Random physical verification should be undertaken at public libraries to establish whether the books recorded as delivered were actually received and are available for borrowing.

The audit report and the Government's action-taken report should be made public every year.

In view of the recent controversy, a special forensic audit of procurement over the preceding five years should also be considered. Its objective should be to identify systemic irregularities, quantify financial losses where established, and determine responsibility for fraudulent transactions.

### G. Public grievance redressal mechanism

A permanent, independent grievance redressal mechanism should be established for authors, publishers, librarians, readers and members of the public.

Complaints may concern unfair exclusion of books, questionable selection, inflated prices, plagiarism, fabricated authorship, unauthorised translations, copyright violations, procurement manipulation or corruption.

Every complaint should be acknowledged within seven days and ordinarily disposed of through a reasoned decision within 30 days, with an extension permitted for complex cases.



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An appellate mechanism should be available, particularly where the complaint concerns officials of the Directorate itself.

Reasonable safeguards should be provided to protect complainants and whistleblowers against retaliation, while preventing misuse through knowingly false complaints.

# III. Decentralisation and Better Use of Library Funds

## H. Local versus centralised book procurement

Keralam offers an example of a more decentralised approach in which local library institutions exercise considerable discretion over their collections.

Local librarians are often better positioned to understand the interests, reading habits, language preferences and educational needs of their communities than officials making purchase decisions centrally.

Tamil Nadu may consider adopting a hybrid procurement model under which **50% of the available procurement funds are allocated to individual libraries for local selection and 50% are retained for centralised procurement**.

This could initially be implemented as a pilot programme across selected districts and subsequently expanded after evaluating its effectiveness.

Clear guidelines should provide for the participation of local librarians, library users, local government representatives and community members in the selection process.

Local libraries should be permitted to acquire books outside the centrally approved shortlist, subject to transparent procedures, reasonable price controls and appropriate audit requirements.

Centralised procurement should continue to serve purposes such as statewide acquisitions, significant reference collections, specialised works and titles that benefit from bulk purchasing.

Decentralisation must not merely transfer the opportunity for corruption from the State level to the local level. The same transparency and accountability standards should apply to both systems.



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## I. Encouraging donations of books to libraries

The present process of donating books to public libraries is unnecessarily difficult and discourages individuals and institutions who wish to contribute to public education and reading.

I have personally experienced this problem.

A donor was willing to purchase **2,000 copies of a few important books published by Kizhakku Pathippagam** and donate them to public libraries in Tamil Nadu. Despite approaching the library authorities, we could not obtain a meaningful response. Consequently, a valuable opportunity was lost.

The Directorate of Public Libraries should establish a formal policy for accepting donations of books, supported by a permanent committee empowered to evaluate such offers.

Every proposal should receive a written acceptance or rejection within 30 days, with reasons.

The policy should allow the evaluation of a representative set of donated titles rather than imposing unnecessary administrative requirements on donors.

Donation procedures must also ensure that libraries are not compelled to accept unsuitable or unwanted books, and that donor interests do not compromise collection quality.

A transparent donation policy would encourage philanthropists, publishers, institutions, foundations and individuals to contribute meaningfully to the public library system.

## J. Reader preferences, actual usage and procurement planning

Book procurement should ultimately be assessed by how effectively public libraries serve their readers, not merely by the number of titles purchased or the amount of money spent.

The Directorate should collect and periodically publish aggregate information regarding circulation, reader requests, frequently borrowed titles, underused books and unmet demand.

Library users should have a simple mechanism to recommend books for acquisition.



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These data should inform future purchasing decisions, particularly at the local level.

However, circulation statistics should not become the sole criterion for selection. Important works of history, philosophy, literature, science and cultural heritage may deserve a place in public libraries even when their immediate readership is limited.

The privacy of individual borrowers must also be protected. Public reporting should be based on aggregate usage data, not identifiable borrowing histories.

# IV. More Efficient and Economical Procurement Models

### K. Nationalised works, public-domain books and duplicate purchases

Tamil Nadu has a distinguished tradition of nationalising literary works, making important books more widely accessible to the public.

However, the procurement of nationalised and public-domain works has also created opportunities for wasteful expenditure and fraudulent repackaging.

The same works are frequently published by different publishers, sometimes with new covers, modified titles or misleading attribution, and repeatedly procured for libraries.

A familiar example is Kalki's *Ponniyin Selvan*, which is available in numerous editions from different publishers.

Such purchases can crowd out other valuable books and deprive contemporary writers and publishers of opportunities to reach library readers.

For standard nationalised works, the Government should consider preparing or approving authoritative editions and inviting competitive tenders for printing, binding and delivery.

This would enable the Government to procure large numbers of copies at substantially lower costs, while maintaining appropriate standards of textual accuracy, printing and binding.

At the same time, genuine new translations, critical editions, annotated versions, scholarly introductions and materially improved editions should continue to be eligible for procurement.

A central bibliographic database should help identify substantial duplication, including works republished under different titles, names or ISBNs.



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The objective should be to prevent wasteful repetition and misrepresentation, not to discourage legitimate publishing activity.

## L. Procurement of educational, academic and reference books from national and international publishers

For educational, academic, scientific and reference books published by national and international publishers, the Directorate should first identify the required titles and editions through an appropriate expert selection process.

Once the titles and quantities are finalised, procurement should be undertaken through competitive tendering among authorised booksellers and distributors.

These suppliers would be able to aggregate orders, negotiate discounts with publishers and offer competitive prices for procurement and delivery.

The tender process should consider the final delivered price, including applicable taxes, shipping and handling charges, and should verify that the supplier is authorised to provide the relevant editions.

This would be more efficient and transparent than relying on individual discretionary purchase arrangements.

Where exclusive distribution rights or other legitimate constraints prevent competition, the reasons for adopting an alternative procurement method should be documented and disclosed.

## M. Procurement and lending of e-books

A growing number of Tamil publishers have begun releasing books in digital formats.

The Government should evolve a comprehensive policy for acquiring, licensing and lending Tamil e-books through the public library network.

Residents of Tamil Nadu should be able to register with the public library system and borrow eligible e-books through an online platform, broadly comparable in user experience to commercial digital reading services such as Kindle Unlimited or Everand.

A dedicated annual fund should be established for procuring or licensing digital books.

Publishers may be compensated through a combination of agreed licensing fees and verified usage-based payments, taking into account actual borrowing and reading activity.



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Appropriate safeguards should prevent manipulation of download counts, artificial reading activity and other forms of fraudulent claims.

The policy must address copyright, digital lending rights, accessibility, data privacy, reasonable lending limits and fair compensation to authors and publishers.

In addition to widening access, a well-designed e-book lending system could significantly benefit readers in rural areas and smaller towns who may not have ready access to large physical collections.

## V. Publishing Integrity and Enforcement

### N. Undertakings by publishers and authors regarding authenticity, copyright and AI-generated content

Every publisher supplying books to public libraries must provide a legally enforceable undertaking concerning the authenticity, authorship and copyright status of the books submitted.

The publisher must certify that:

1. Every named author is a real and identifiable person who has authorised publication of the work.
2. The publisher possesses the necessary rights to publish and supply the book.
3. The work does not contain plagiarised material, fabricated authorship, deliberately falsified content or unauthorised reproduction of copyrighted works.
4. In the case of translations, the necessary translation rights have been obtained from the original copyright holder wherever such permission is legally required.
5. The work has been subjected to appropriate editorial and factual scrutiny, and the publisher accepts responsibility for the authenticity of the submitted publication.
6. Any substantial use of generative AI in producing the substantive content of the book has been disclosed, distinguishing such use from ordinary editorial assistance, proofreading, indexing or other supporting functions.

Publishers should, in turn, obtain appropriate declarations from the respective authors, translators and editors.

The intention is not to prohibit legitimate technological assistance in publishing, but to prevent the supply of fraudulent, fabricated, plagiarised or falsely attributed books in the guise of genuine literary or scholarly publications.



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**Consequences of violation**

If a book is found, after appropriate verification and due process, to violate these undertakings, the publisher should be required to withdraw all affected copies supplied to public libraries at its own expense and refund the amounts received from the Government.

Additional penalties may be imposed according to the nature and seriousness of the violation.

Deliberate or repeated serious fraud should attract long-term or permanent debarment from future government procurement, following notice and an opportunity to respond.

Where criminal offences are disclosed, appropriate prosecution should follow.

These safeguards should apply equally to books in Tamil, English and other languages.

## O. Time-bound implementation and continuing public oversight

One of the most disturbing aspects of the current controversy is that many of the necessary safeguards were already prescribed in the 2024 High Court judgment.

The subsequent events indicate that the mere existence of a policy, government order or online portal is insufficient.

The Government should therefore publish a time-bound implementation roadmap for all the reforms proposed above.

The roadmap should specify the responsibility of the relevant department or official, the implementation deadline, and measurable criteria for determining compliance.

Quarterly public reports should disclose the progress of reforms, procurement expenditure, audit findings, complaints received and resolved, and corrective measures undertaken.

An annual review involving independent experts, authors, publishers, librarians and representatives of library users should examine whether the procurement system is genuinely serving the public interest.

The implementation reports should be permanently accessible on the Directorate's website.



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## Conclusion

The ultimate purpose of public library procurement is not to provide business opportunities to publishers or distributors, but to make the best possible books available to the people of Tamil Nadu through the efficient and fair use of public funds.

A transparent procurement system should simultaneously protect public money, encourage genuine authors and publishers, preserve our literary and intellectual heritage, and respond to the needs of readers.

Tamil Nadu has a rich publishing tradition and an extensive public library network. It should be possible for the State to establish a model procurement system that other States in India would wish to emulate.

The recent controversy should therefore be treated not merely as an isolated incident requiring investigation and punishment, but as an opportunity to undertake lasting structural reform.

I request the Government to initiate a time-bound consultation with publishers, authors, librarians, readers and independent experts, and implement the necessary reforms with clear provisions for transparency, accountability and independent oversight.

Above all, **the Government must ensure that the rules and procedures prescribed for transparent procurement are implemented in practice, and that compliance can be independently verified by the public.**



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Annexure - B

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# Strengthening Book Procurement for Public Libraries in Tamil Nadu

Supplementary safeguards under the Transparent Book Procurement Policy 2024 and a proposal for a High Level Expert Committee

Note for Government consideration

## Part I Existing policy and the need for supplementary safeguards

### 1. Existing policy framework

The Government of Tamil Nadu has established a comprehensive framework for transparent procurement of books for public libraries through the Transparent Book Procurement Policy, 2024, issued in G.O.(Ms) No.69, School Education Department, dated 07.03.2024.

The policy provides for online applications, bibliographic particulars and review copies, point-based evaluation by subject experts, participation of librarians and readers, quality verification, a Book Price Index, online price negotiation, and procedures for ordering, supply and payment. It also addresses personal bias and unfair practices, including alteration of titles or authors' names, unauthorised reproduction, manipulation of publication particulars, artificial inflation of page counts and supply of inferior books.

### 2. Compliance with existing requirements

The first requirement is consistent implementation of the existing policy in its entirety. Every prescribed safeguard shall be supported by a verifiable administrative process, a designated responsible authority, supporting records and supervisory checks.

The High Court's judgment dated 19.06.2024 in W.P.(MD) No.10150 of 2019 additionally requires procurement in consonance with the policy, a functional public portal, publication of shortlisted books with relevant particulars and covers, and a month's opportunity for public remarks and objections before finalisation. These are existing compliance obligations and shall be incorporated into the procurement calendar.

### 3. Need for further strengthening

Concerns relating to fabricated publications, fictitious authorship, misuse of bibliographic identifiers, undisclosed machine-generated content and manipulation of digital selection records warrant a focused review. The exercise shall distinguish failures in implementation, procedural gaps requiring clarification, and emerging risks requiring policy amendments. The existing framework may accordingly be preserved and strengthened through targeted supplementary safeguards.

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## Part II Additional safeguards proposed for consideration

### 4. Authenticity of content and disclosure of AI use

Every application may carry a title-specific declaration from the publisher, supported by the author or authorised rights holder wherever reasonably obtainable, confirming the authenticity of authorship, lawful entitlement to publish and supply, and absence of undisclosed reproduction or substantial recycling of other works. The declaration shall disclose whether generative artificial intelligence was used to produce substantive text, translations, illustrations or other material content, and the nature and extent of that use.

The policy may distinguish assistance in spelling, formatting or language editing from substantive machine generation presented misleadingly as original human authorship. The declaration should establish responsibility for the work rather than depend upon an unverifiable blanket certification that no AI tool was used at any stage.

### 5. Technical screening and expert verification

A documented screening procedure may identify duplicated text, fabricated references, repetitive or incoherent material, false attribution and substantially identical content submitted under different titles. Automated plagiarism and AI-detection tools may assist in identifying titles requiring closer examination; a software score shall not, by itself, constitute proof of fabrication or a sufficient ground for rejection or penal action.

Flagged titles may be referred to an independent content-verification panel for a reasoned assessment. Copying, scanning and processing of review material shall be subject to appropriate copyright permissions and confidentiality safeguards.

### 6. ISBN and bibliographic verification

The requirement that a book carry an ISBN may be supplemented by verification, through the competent ISBN agency or other authoritative records, of its association with the relevant publisher, title, edition and format, to the extent records are available. A valid ISBN shall not be treated as certification of originality, factual accuracy, literary merit or freedom from AI-generated content. Reused, inconsistent or apparently fabricated identifiers shall be clarified before selection.

### 7. Verification of publishers, authors and connected entities

Proportionate documentary requirements may establish the legal identity, business address, ownership and supply authorisation of applicants. Publishers may disclose sister concerns, related imprints and entities under common ownership or control, enabling detection of attempts to circumvent procurement limits or debarment orders.

Independent authorship confirmation may be sought where impersonation or false attribution is suspected. Genuine pen names and confidential particulars shall receive appropriate protection. Credible new and small publishers shall be permitted to participate; absence of a large catalogue or long trading history shall not, by itself, establish lack of genuineness.

### 8. Evidence of publication and availability

Independent catalogues, publisher records, bookseller listings, library holdings and reviews may corroborate a title’s existence and publication history. Absence from commercial platforms may warrant verification but shall not automatically disqualify a genuine new publication, specialist work, small-press edition or work intended for a limited readership.

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### 9. Adequate review time and recorded assessment

Reasonable review periods, manageable allocations of titles and a standard assessment format may be prescribed. Each title shall have a traceable record of assigned reviewers, completed assessment, scores and decision. Titles awaiting substantive evaluation shall be carried forward rather than cleared merely to meet expenditure or inauguration deadlines. Interest declarations and recusal shall cover financial, professional and publishing relationships capable of affecting impartial assessment.

### 10. Integrity of the digital selection process

The portal may provide separate permissions for recommendation, evaluation, selection, approval and payment; authenticated approval and locking of lists at each stage; tamper-evident logs of additions, deletions and alterations; and reconciliation between expert recommendations, approved titles, orders, deliveries and payments. No title shall enter the final list without prescribed scrutiny. Subsequent additions shall undergo the same applicable process, with their origin and approval recorded.

### 11. Public scrutiny and disposal of objections

The judicial requirement of public display may be operationalised through procedures for publication, acknowledgement, independent examination, reasoned disposal and retention of objections. Published particulars may include the title, author, publisher, ISBN, edition, cover, proposed quantity and procurement price. Objections shall be decided before finalisation. Public disclosure shall include safeguards against exposure of personal information, unlawful material and unsupported personal allegations.

### 12. Price scrutiny and enhanced approval

The Book Price Index and online negotiation requirements may be supplemented by scrutiny of the net price payable against comparable editions, production specifications and independently verifiable market prices. High-value titles, unusually large orders, exceptional prices and substantial concentration within a connected publisher group may require independent appraisal and higher approval.

Thresholds, approving authorities and permissible exceptions shall be prescribed in advance. Exceptions shall carry recorded reasons, particularly for specialist reference works, imported publications and accessible formats.

### 13. Inspection, payment and remedies after supply

Inspection may extend beyond paper, printing and binding to sample verification that supplied content corresponds to the reviewed and approved edition. Supply conditions may provide for replacement, rejection, withholding of the disputed portion of payment and recovery of amounts paid for established misrepresentation or non-conforming supply, subject to applicable law and contractual terms. Recovery through any statutory mechanism shall first be examined for legal authority.

Debarment shall follow notice, opportunity to respond and a reasoned order, with its scope and duration proportionate to established misconduct. Criminal referral may be made where verified facts disclose a suspected offence; it shall not follow automatically from an adverse software flag.

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### 14. Initial collections for new and special libraries

For newly established or special libraries involving large initial collections, a dedicated Standard Operating Procedure may incorporate the applicable safeguards of the 2024 policy and judicial directions. It may recognise expert-led collection building across subjects while requiring recorded evaluation, price scrutiny, public disclosure and traceability of every approved title.

### 15. Demand aggregation and continuing oversight

Minimum aggregate order quantities may be examined against actual demand, delivery costs and collection diversity. Any threshold shall accommodate specialist, minority-language, local-history and accessible-format publications. Periodic procurement audits, sample content audits, supplier-concentration analysis and publication of title-wise expenditure and payment particulars may be introduced to identify recurring weaknesses.

## Part III Proposed High Level Expert Committee

### 16. Constitution and composition

Government may consider a compact High Level Expert Committee to review the existing policy, its implementation and the accompanying reform suggestions. An indicative composition is set out below.

**Chairperson:** An eminent serving or retired civil servant with substantial administrative experience and recognised engagement with literature, education or public institutions. Government may consider a person such as Thiru V. Irai Anbu, IAS (Retd.), or Thiru T. Udhayachandran, IAS, subject to consent, availability and applicable administrative requirements.

**Literary member:** An eminent writer of recognised standing, such as Professor Perumal Murugan, subject to consent and disclosure of relevant interests.

**Publishing member:** A representative of a reputed publishing institution with substantial editorial and production experience, selected through objective criteria.

**Library member:** A senior library professional experienced in collection development, cataloguing and public-library administration.

**Technical member:** An independent expert in digital audit, information security or content verification. The Directorate may provide secretarial assistance. Finance, Law and other specialists may be invited for specific matters without enlarging permanent membership.

### 17. Terms of reference

(i) Undertake a clause-wise review of the 2024 policy, relevant Government Orders, operational guidelines and applicable judicial directions.

(ii) Distinguish implementation deficiencies from gaps in policy design.

(iii) Examine the accompanying suggestions and identify measures already prescribed, measures requiring clarification and measures requiring amendment.

(iv) Recommend safeguards against fabricated content, false authorship, ISBN misuse, plagiarism, undisclosed substantive AI generation and manipulation of digital records.

(v) Define practical responsibilities for publishers, reviewers, librarians, approving authorities and payment officers.

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(vi) Recommend a separate SOP for large initial procurements for new libraries.

(vii) Review exceptional procurement routes, high-value approvals, supplier concentration and conflict-of-interest controls.

(viii) Submit draft amendments, standard declarations, inspection formats and an implementation plan specifying authorities and timelines.

## 18. Independence and scope

Members shall disclose relevant interests and abstain from matters affecting their publications, publishing institutions, financial interests or transactions in which they previously participated. The mandate shall concern systemic reform. It shall not substitute for, interfere with or prejudge judicial, vigilance, disciplinary or criminal proceedings. Individual culpability shall remain for determination by the competent authorities.

## 19. Time frame and deliverables

The Committee may submit interim recommendations within thirty days and its final report within ninety days of constitution. A comparative statement may set out each existing provision, identified deficiency, proposed amendment or instruction, implementing authority and means of verifying compliance. Government may thereafter issue necessary amendments and instructions with appropriate legal and financial vetting.

## 20. Proposal for Government consideration

Government may constitute the above High Level Expert Committee to examine the Transparent Book Procurement Policy, 2024, together with the accompanying reform suggestions, and recommend supplementary measures necessary to secure its effective implementation in letter and spirit. The review shall aim to apply public funds to genuine and useful publications through a transparent, accountable and verifiable process, while supporting literary diversity and fair participation by credible publishers.

## Documents referred to

1. Transparent Book Procurement Policy 2024, supplied policy document; G.O.(Ms) No.69, School Education Department, dated 07.03.2024.

2. Reform of Book Procurement for Public Libraries in Tamil Nadu - A Note of Suggestions, supplied draft.

3. S. Krishnan v. The Secretary to Government, W.P.(MD) No.10150 of 2019, judgment dated 19.06.2024, particularly paragraph 12.

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# Reform of Book Procurement for Public Libraries in Tamil Nadu: A Note of Suggestions

## 1. Purpose of this note

1.1 This note sets out suggestions for reforming the procurement of books for public libraries in Tamil Nadu. It takes into account two decisions of the Madurai Bench of the Madras High Court. The first is the judgment dated 19.06.2024 in W.P.(MD) No.10150 of 2019 (referred to below as "the 2024 judgment"). The second is the order dated 11.11.2026 in Cont.P.(MD) No.3763 of 2026, which arises out of it (referred to below as "the contempt order").

1.2 Two different kinds of procurement are involved, so the suggestions are in two parts:

(a) **Part I:** The one-time procurement of a large collection, of one lakh books or more, for newly established special libraries. This is at present done through the committees constituted under G.O.(Ms) No.250, School Education Department, dated 05.11.2025.

(b) **Part II:** The continuous procurement of additions for the existing public libraries. This is governed by the Transparent Book Procurement Policy, 2024, issued in G.O.(Ms) No.69, School Education Department, dated 07.03.2024 (referred to below as "the Transparent Book Procurement Policy").

1.3 In the 2024 judgment, the High Court observed that "*time has come to put in place proper mechanism for such procurement*". It directed that procurement be in line with G.O.(Ms) No.69 and that a dedicated website be maintained. It also directed that every shortlist be published, with the book cover, for a month of remarks and objections before the procurement is finalised. In the contempt order, the Court has recorded that "*bound stationery passing for books*" has been purchased for various public libraries.

1.4 The suggestions, in brief, are as follows.

(a) **For special libraries:** a Standard Operating Procedure (SOP) for one-time collection building. It would bring in the good practices of the Transparent Book Procurement Policy together with the transparency directions of the Court, and would be issued along with the Government Order sanctioning each new library.

(b) **For existing libraries:** amendments to the Transparent Book Procurement Policy so that it deals with machine-generated content (including an immediate red flag by reviewers), the qualification of publishers and authors, adequate time for review, a minimum order quantity for each title, and the publication of the shortlist for claims and objections.

(c) **Common to both:**

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- a declaration by the publisher and screening for AI-generated content;
- a check that each book is actually sold in the open market;
- verification of the publisher and the author;
- a mandatory minimum time for review;
- expert scoring recorded title by title;
- a price ceiling based on the Book Price Index;
- a limit on the share of any one publisher;
- publication of the shortlist for thirty days;
- a content check before payment and a clause for recovery afterwards.

## 2. New libraries and existing libraries: why two procedures

2.1 Adding books to a library that already exists is different from stocking a new library from an empty building. The first is a small, regular addition to a collection that is already balanced. The second is the planning and purchase of an entire collection, across every subject, in a single round. The two differ in scale, in who chooses the books, and in where the titles come from. That is why two separate procedures have come into use.

| | Existing libraries | New special libraries |
|---|---|---|
| Libraries covered | More than 4,500 district central, branch, village and part-time libraries | Periyar Arivulagam (Coimbatore), Kamarajar Arivulagam (Tiruchirappalli), Bharathidasan Arivulagam (Salem), Anjalai Ammal Arivulagam (Cuddalore), Quaid-e-Millath Arivulagam (Tirunelveli), and new district central libraries |
| Nature of purchase | Continuous additions and replacements, every quarter | One-time purchase of a complete collection, one lakh titles or more |
| Source of funds | Library cess, of which up to 25% is used for reading material (Transparent Book Procurement Policy, paras 11 and 15) | One-time grant. G.O.(Ms) No.250 provides ₹136 crore in all for books and e-books |
| How titles come in | Publishers apply online, book by book, and each book is evaluated and scored | Subject experts identify the best titles from syllabi, reference lists, award lists and the catalogues of Indian and foreign publishers |
| Who decides for each library | Readers' circle and librarian, choosing from an approved list (Transparent Book Procurement Policy, para 16) | Committees decide centrally for the whole collection |

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| | Existing libraries | New special libraries |
|---|---|---|
| Range | Mainly Tamil; general reading and competitive-examination books | Tamil and English, academic and research titles, children's books, Braille and audio books, e-books and e-journals |

2.2 **Why the Transparent Book Procurement Policy alone is not enough for a new library:** The Transparent Book Procurement Policy depends on publishers applying, title by title. A research-grade collection of a lakh titles cannot be built that way. Many of the books it must hold are never offered by their publishers: international academic titles, reference works, award winners and government or research publications. Someone has to go looking for them, subject by subject, and that is work only subject experts can do. This is why G.O.(Ms) No.250 created a 137-member Book Recommendation Committee and a 13-member Book Selection Committee.

2.3 **Why the committees still need the safeguards of the Transparent Book Procurement Policy:** A large one-time purchase is more open to abuse than routine additions. The volume is large, the time is usually short, and a single order can be worth lakhs to one supplier. The safeguards developed in the Transparent Book Procurement Policy therefore matter even more here: scoring, a price ceiling, online negotiation and display of the list.

2.4 **Suggested approach:** The Transparent Book Procurement Policy is designed for continuous procurement, and G.O.(Ms) No.250 for a one-time purchase. Merging the two into a single framework is therefore not advisable. It is suggested instead that a **Standard Operating Procedure for one-time collection building** be framed. It would carry over all the good practices of the Transparent Book Procurement Policy, with the changes needed for bulk selection, and include the transparency directions of the Court. The SOP would be issued along with the scheme Government Order for each new library, so that the committees have a fixed procedure to follow from the first day. Its contents are set out in Part I.

# Part I: Special libraries (one-time procurement of a large collection)

## 3. The present four-committee process

3.1 G.O.(Ms) No.250 sanctions ₹50 crore each for Coimbatore and Tiruchirappalli, ₹10 crore each for Salem, Cuddalore and Tirunelveli, and ₹1 crore each for six new district central libraries, to buy books and e-books. It constitutes four committees, which work one after another. The Director of Public Libraries coordinates all four.

(a) **Book Recommendation Committee:** with 137 members, about three for each subject. It is made up of professors, writers and specialists in more than fifty subjects. Its task is to recommend the best books in each field. This is the only stage at which a subject expert is meant to look at the book itself.

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(b) **Book Selection Committee:** with 13 members. It evaluates the recommended titles and finalises a priority list in five streams: Tamil, English, academic, children's, and books for the visually impaired.

(c) **Book Procurement Price Negotiation Committee:** with 5 members, all officials of the Directorate and the Finance Department. It negotiates directly with publishers and sellers for the highest discount.

(d) **High Level Committee:** with 5 members. It is chaired by the Principal Secretary to Government, School Education Department, and the Director of Public Libraries is its Member-Secretary. It approves the titles, the number of copies and the prices.

3.2 Annexure I to the G.O. lists the sources from which titles may be drawn. These include online bookstores and review sites, reviews in the media, the reading lists of national universities, catalogues sent by publishers and sellers, bestseller lists and literary awards.

3.3 As a design, the sequence of experts first, then selection, then price, then approval is sound. The weakness is that the G.O. constitutes the committees but lays down no procedure for them. It does not say what each committee must check, in what order, on what record, within what time, or what follows if a stage is skipped. The loopholes discussed below follow from this.

## 4. Loopholes in special-library procurement and suggested remedies

4.0 The facts recorded in the contempt order show how far the existing safeguards failed. One supplier is said to have offered 2,335 titles, of which 1,700 were selected, and it was paid about ₹17 lakh. An established publisher with hundreds of titles received an order for about ₹23,000. The Court remarked that when not even one book of that supplier is seen in the market, it is difficult to understand how no one's suspicion was aroused. Whether the experts approved these books, or the books were inserted into the lists at the digital stage without the experts' knowledge, is under investigation. In either case, the procedure did not prevent it. The loopholes are discussed below, each followed by the remedy suggested for it.

### 4.1 No check on whether the content is genuine

G.O.(Ms) No.250 does not ask whether a book was actually written by a person, whether it reads coherently, or whether its facts are correct. Software can now produce book-length text in a matter of minutes, under any number of titles and author names. A book judged by its title, its cover and a few pages can pass through a committee unnoticed.

Full digital texts cannot be demanded as a remedy. Publishers, particularly reputed Tamil, English and foreign publishing houses, will not part with them, for reasons of copyright. A layered check is suggested instead, built on what is practicable:

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(a) **Declaration:** For every title, the publisher should declare whether AI software was used in writing, translating or editing it, and to what extent. A false declaration should be treated as an unfair practice, leading to debarment and criminal action.

(b) **Automated screening of the review copy:** The Directorate may scan a fixed number of pages, chosen at random from different parts of the printed review copy, solely for screening and under an undertaking of confidentiality. Where the publisher already offers a digital preview, that may be used. The pages would be compared with all other submissions, to catch the same text recycled under different titles and author names, and with the digitised nationalised works held by Government. They would also be checked with AI-detection tools. A flag only marks the title for closer verification. It is not by itself a ground for rejection, since no tool is fully reliable, particularly for Tamil.

(c) **Market-existence test:** It should be verified whether the book is actually sold in bookshops or online, when it was first published, and whether it has been reviewed or catalogued anywhere. A book printed only for a Government order is a warning sign.

(d) **Verification of flagged titles:** Subject experts are eminent persons serving in an honorary capacity, and they cannot be required to read every book in full. A separate Content Verification Panel may therefore be engaged, made up of retired teachers, research scholars and librarians and paid per title. It would read the flagged titles and report before they go to the experts for scoring.

(e) **Check on delivery:** Librarians should compare the delivered copy with the review copy, and the Verification Panel should examine a random sample of titles from each consignment.

### 4.2 No qualification for publishers and authors

At present, anyone may offer books. There is no requirement of registration, of a real place of business, of a record of selling in the open market, or of proof that the ISBN (the International Standard Book Number, which identifies a book uniquely) belongs to that publisher. There is also no requirement that each author be a real, identifiable person. The 2024 judgment took note of the allegation, placed on record by the petitioner, that "*a publisher runs a dozen publications in different names only for the sake of getting Government orders*".

It is suggested that only empanelled publishers and authorised distributors be allowed to supply, with empanelment renewed every year. The conditions may be as follows.

(a) **A legal identity:** PAN in the name of the publisher, and proof of constitution. This would be a certificate of incorporation for a company, a registered deed for a partnership, or Udyam registration or a trade licence from the local body for a proprietary concern. The publisher should also have a current account in the firm's name and should have filed income-tax returns for the last two years. GST registration should not be made a condition. Printed books are exempt from GST, and a person dealing exclusively in exempt supplies is not liable to register under section

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23(1)(a) of the Central Goods and Services Tax Act, 2017. GST registration may be asked for only where the publisher also supplies taxable items, such as e-books.

(b) **A verifiable place of business:** This should be checked through documents alone and without any field visit. Field inspection is practicable only within Tamil Nadu, and it brings officials and suppliers into direct contact, which the procedure should avoid. The publisher should upload proof of address: the address on the registration or Udyam certificate, a lease or ownership document, and a recent utility bill. Geo-tagged photographs of the premises and signboard should also be uploaded. The portal should cross-check this address with the addresses on the PAN, the ISBN agency record and the income-tax return. Any mismatch should lead to the application being returned, and a false declaration should be treated as an unfair practice. A small percentage of empanelled publishers may be selected at random by the portal for a fresh desk verification each year.

(c) **A track record of trading:** Publishers with at least 200 titles and at least five years of trading may be placed in the established category. The Directorate is already required by the 2024 judgment to maintain a list of such publishers. Smaller or newer publishers may be admitted in a separate category if they have traded for at least two years and have at least ten titles in the open market, subject to a lower ceiling and closer verification. Genuine small presses should not be shut out.

(d) **ISBN ownership:** The ISBN prefix must be registered in the publisher's own name.

(e) **Statutory deposit:** Proof of deposit of copies with the Connemara Public Library under the Delivery of Books and Newspapers (Public Libraries) Act, 1954, as the Transparent Book Procurement Policy already contemplates in para 3.

(f) **Sister imprints:** A declaration of the owners and of all sister imprints. Linked imprints should be treated as one group for ceilings, scoring and debarment.

(g) **Distributors:** Letters of authorisation from each publisher whose books they offer.

(h) **Verification of authors:** Two risks need to be covered: a fictitious author, and a book that wrongly carries the name of a real author. The second cannot be detected merely by confirming that the author exists. It must be confirmed that the author actually wrote the book. The verification may be done as follows.

(i) Formal author agreements and royalty statements are not common practice in Tamil publishing, and they cannot be obtained for English and international titles. They should not be insisted upon. Instead, the publisher should file a simple declaration for each title. It would give the author's real name, a short biographical note and the author's contact details. Where a pen name is used, the real name would be disclosed to the Directorate in confidence.

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(ii) The portal should check every title against the named author's known body of work in national and international bibliographic records and in the catalogues of that author's regular publishers. This check should be automated.

(iii) Where a well-known author's name appears on a title missing from that author's known works, the title should be flagged. The same applies where such a name appears with a publisher the author has not been associated with before. In these cases, confirmation must not be sought through the contact details given by the applicant publisher, since those can themselves be false. It should be sought in writing by the Directorate through independent channels, such as the author's institutional e-mail address or the author's regular publisher.

(iv) For other titles of new or small publishers, and for titles flagged in screening, the portal may send an automated message to the author's declared mobile number or e-mail address seeking confirmation of authorship. This avoids any personal contact.

(v) Exemption from the author declaration should not turn on any official's view of whether a publisher is "established". The portal should grant it automatically, title by title, only where every one of the following conditions is met:

- the publisher is empanelled in the established category under (c), on documentary criteria alone (at least 200 titles and at least five years of trading, verified from the registration certificate and income-tax returns), and has no adverse record under paras 12 or 23 of the Transparent Book Procurement Policy;
- the ISBN agency record for the title matches the publisher, the title and the author declared;
- the title is held by at least three libraries outside Tamil Nadu, as shown in a national or international union catalogue, or it carries Cataloguing-in-Publication data issued by a national library;
- the title has been on sale through at least two independent channels, such as bookshop distributors or online retailers, for at least six months before the date of the call.

A title that fails any of these conditions must file the declaration under (i). Every title, exempt or not, remains subject to the automated check in (ii).

In the case of nationalised and out-of-copyright works, the true author must be credited. A fictitious author, or the false attribution of a book to a real author, should be treated as an unfair practice. It should lead to permanent debarment of the publisher group, recovery of the money paid and a criminal complaint. False attribution also infringes the author's right to claim authorship under section 57 of the Copyright Act, 1957.

### 4.3 No mandatory time for review

G.O.(Ms) No.250 prescribes no schedule and no minimum period for any stage. It places no limit on the number of titles an expert may be asked to examine. A collection of a lakh titles cannot

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be examined with care in a few weeks. When time runs short, the expert stage is the first to suffer, being the slowest.

It is suggested that the Government Order constituting the committees and approving the SOP be issued together with the Government Order for construction of the library building, **not less than twenty-four months before the tentative date of opening.** The minimum period for each stage should be written into the SOP, and the date of inauguration should not be a reason to curtail it.

| Stage | Minimum period |
|---|---|
| Collection plan: target number of titles by subject, language and level | 1 month |
| Call for titles, verification of publishers and automated screening (alongside experts identifying titles themselves) | 4 months |
| Expert review and scoring | 6 months |
| Book Selection Committee | 2 months |
| Price fixation and online negotiation | 2 months |
| Display for claims and objections | 1 month (30 days) |
| Disposal of objections and High Level Committee approval | 1 month |
| Supply, check on receipt and acceptance | 6 months |
| **Total** | **23 months** |

No expert should be allotted more titles than can be examined with care, for example not more than twenty titles a week. The load of each expert should be visible on the portal.

### 4.4 No expert scoring and no title-wise record

The Transparent Book Procurement Policy requires point scoring by more than one reviewer, and re-review where a reviewer's marks are out of line (paras 4, 5 and 20). G.O.(Ms) No.250 has no such requirement. There is no rubric, no minimum mark, and no record of which expert recommended which book and why. It is therefore not possible afterwards to verify whether a particular title actually passed through the expert stage.

It is suggested that each title be scored out of 100 by two experts working independently. Titles should be allotted at random by the portal, and neither expert should see the other's marks. The marks may be weighted as follows:

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| Criterion | What the expert assesses | Maximum marks |
|---|---|---|
| Relevance to the subject | Fit with the subject and level for which the title is offered | 20 |
| Accuracy and authority | Correctness of facts, dates and references; standing of the author in the field | 25 |
| Quality of language | Clarity, coherence and correctness of the text | 15 |
| Originality and genuine authorship | Whether the work is original and actually written by the named author, not copied, recycled or machine-generated | 20 |
| Usefulness to readers | Value to the readers the library serves | 10 |
| Production quality | Paper, printing, binding and layout | 10 |
| **Total** | | **100** |

The rules for scoring may be as follows:

| Rule | Requirement |
|---|---|
| Minimum to qualify | A title goes forward only if it secures at least 60 |
| Difference between experts | Where the two marks differ by more than 20, a third expert scores the title |
| Record | The portal does not allow any title to reach the Book Selection Committee without two recorded scores |
| Role of the Selection Committee | The Committee may filter out titles from the scored list, with reasons recorded. It may not add titles directly. Any title it wishes to add goes back through the full expert stage, subject to the safeguards below |

The stage between expert recommendation and selection is the most vulnerable point in the process. A title that enters there bypasses the experts entirely, and a large list makes it easy for such entries to go unnoticed. The following safeguards are therefore suggested.

(a) **No direct additions:** The Book Selection Committee should select and rank titles from the scored list. It may filter out titles that have qualified, for example to remove duplication, to keep within the budget for a subject, or to balance the collection across subjects and levels, with brief reasons recorded on the portal for each title or group of titles removed. It should have no power to add a title directly to the selection list.

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(b) **Additions go back to the experts:** If a member considers that a title has been left out, the member may propose it on the portal. The title then re-enters the process as a fresh recommendation. It goes through screening, the market-existence test, verification of the publisher and author, and two independent expert scores, like any other title. The proposing member cannot be one of the experts who score it.

(c) **Proposals by name, one at a time:** Only members of the Committee may propose a title, and each proposal must carry the member's name, signature and written reasons. Officials of the Directorate, including the Member-Secretary and the portal administrators, should have no power to propose or enter titles. The portal should not accept bulk uploads of lists at this stage.

(d) **Ceiling:** Proposals by the Committee should not exceed five per cent of the titles or of the value of any subject list. They should not be accepted for publishers in the new or small category.

(e) **Reconciliation statement:** Before the list goes to the High Level Committee, the portal should generate a statement for each subject showing the following: the number of titles recommended by the experts, the number rejected, the number filtered out by the Committee, the number proposed by the Committee, and the origin of every title on the final list. Any title on the final list without a traceable origin should be removed automatically.

(f) **Disclosure:** Titles proposed by the Committee should be shown separately in the list displayed for claims and objections, with the name of the proposing member.

### 4.5 No price ceiling

Under para 13 of the Transparent Book Procurement Policy, a Book Price Index is prepared every year from books sampled in the open market. It gives, for each type of book, an average price per page and a range from a minimum to a maximum. The acceptable price of a book is worked out from this index, books priced above the range are not bought, and negotiation is conducted only online. G.O.(Ms) No.250 contains none of this. Its Negotiation Committee seeks the highest discount on the printed price, in direct talks with publishers and sellers. A discount on the printed price means little when the printed price itself can be inflated. A publisher can print a high price on a book sold nowhere else, allow a generous discount, and still be overpaid.

It is suggested that the Book Price Index be applied to special libraries as well, and that the test be applied to the price actually paid, not to the printed price.

(a) **How the index is built:** Every year, a sample of books of each type is bought in the open market, and the price per page of each book is worked out. These figures will vary, because some books are unusually cheap and some unusually expensive. If a simple average were taken, a handful of overpriced books would pull the figure up, and a few remainders sold at clearance prices would pull it down. The formula therefore first sets aside such extreme values (outliers), for example the cheapest and costliest ten per cent of the sample. It then takes the middle value of what remains as the standard rate per page, and the spread of the middle band of prices as

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the acceptable range. In simple terms, the index reflects what an ordinary book of that type actually costs in the market, not what the most expensive or the cheapest book costs. The calculation is done by software, as the Transparent Book Procurement Policy already provides, so that no individual can adjust it.

(b) **Acceptable price range:** For each title, the portal works out a range by multiplying the number of pages by the lower and upper rates per page for that type of book. Allowance is made for paper quality, colour printing and binding.

(c) **Net price within the range:** The price payable after the negotiated discount must fall within this range. A title whose net price stays above the upper limit is not bought, however large the discount offered on the printed price.

(d) **Negotiation towards the standard rate:** Within the range, negotiation should aim at the standard rate per page for that type of book, and discounts should be compared with those obtained for similar books.

(e) **Illustration:** Take a 200-page Tamil non-fiction book with a printed price of ₹300. Suppose the index for that type of book, worked out as in (a), gives an acceptable range of 60 to 90 paise a page and a standard rate of 75 paise. The acceptable price range is then ₹120 to ₹180. The net price after discount must not exceed ₹180, which means a discount of at least 40 per cent on the printed price, and negotiation should aim at about ₹150. A discount of 30 per cent, bringing the price to ₹210, would not qualify. (These figures are given only to explain the method.)

(f) **Imported books and e-resources:** Foreign titles cannot be priced on the Indian index, so they are benchmarked against the foreign publisher's list price. This can be misused. A book printed and published in India can be presented as an imported book and priced in dollars or pounds at many times its real value. The "imported" category should therefore be allowed only on objective proof, as follows.

- **Foreign ISBN:** The ISBN must belong to a foreign registration group and be registered to the foreign publisher. Books carrying an Indian ISBN prefix (978-81 or 978-93) should be treated as Indian books and priced on the Indian index, whatever currency is printed on the cover.
- **Foreign list price:** The list price must be verifiable on the foreign publisher's own website or catalogue, in the original currency, on the date of the offer.
- **Printed abroad:** The copyright page should show that the book was printed and published outside India.
- **Indian editions priced as Indian books:** Indian reprints and low-priced editions of foreign titles, including those marked "for sale in India only", should be priced as Indian books.
- **Authorised supply:** The supplier should hold a letter of authorisation from the foreign publisher, and should produce the import invoice for the copies supplied.
- **Conversion rate:** Foreign prices should be converted at the reference rate of the Reserve Bank of India on the date of the offer, not at a conversion rate fixed by the trade.

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- **Comparison with other libraries:** Prices should also be compared with those recently paid by State and university libraries for the same title.

E-books and e-journals should be bought only from the publisher or an aggregator holding the publisher's authorisation, and benchmarked against consortium rates.

(g) **Online negotiation:** All negotiation should be conducted online, and one external member, such as a senior university librarian, may be added to the Negotiation Committee.

### 4.6 No limit on the share of a single supplier

Nothing in G.O.(Ms) No.250 prevented 1,700 titles from being taken from one little-known source. Nothing raised an alert about the volume, the newness of the publisher, or the absence of its books in the market.

It is suggested that no publisher group receive more than a fixed share of the value of a library's purchase, for example three per cent, unless the High Level Committee records specific reasons. Smaller and newer publishers may be given a lower ceiling. The portal should also flag the following for closer verification: sudden volumes from one source, newly formed imprints, author names that repeat or are recombined, near-identical titles, and books whose price per page is out of line.

### 4.7 No secure record of the digital process

The selection was carried out largely on a digital platform, with no tamper-proof record of who added, altered or approved each entry. The possibility that titles were inserted at the digital stage, which is now under investigation, could not have been ruled out from the record.

It is suggested that the list approved at each stage be locked and digitally signed by the committee concerned before it moves to the next stage. Every addition, deletion and alteration should be logged with the name of the user and the date and time. Any title in a later list that cannot be traced to an expert recommendation should be flagged automatically. The security of the portal should be audited by an independent agency before each round.

### 4.8 No public display of the list

The 2024 judgment directed that the shortlist be published, with the book cover, for a month of remarks and objections. This was not followed for the special libraries. In the contempt order, the Court has observed that the offending acts constitute "*a direct and wilful breach*" of the directions given in the 2024 judgment.

It is suggested that the full shortlist for each special library be displayed on the portal for thirty days before the High Level Committee approves it, in the manner set out in paragraph 7.4 below. The objections received, and the decisions on them, should remain on the website.

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### 4.9 Overlapping roles, and payment before verification

The Director of Public Libraries coordinates all four committees and is also Member-Secretary of the High Level Committee that approves their work. The approving committee therefore depends on the coordinating officer for the facts placed before it. G.O.(Ms) No.250 is also silent on checking books on receipt and on the terms of payment.

The existing composition of the High Level Committee may continue. What should change is the basis on which it approves. It should not depend on the word of any one person, official or non-official. Instead, the portal should generate a compliance report for each library, drawn directly from the audit trail. The report would show, title by title, the expert scores, the selection decision, any filtering or proposed addition with its reasons, and the net price against the acceptable range. It would list separately any title that has not passed every stage. The report should reach every member of the High Level Committee directly from the portal, not through the coordinating office. Before the meeting, the concurrent auditor should test a random sample of titles against the report and place a short note before the Committee. In this way the Committee approves on a record that it can verify for itself, and no individual officer or expert is asked to certify the whole list. Every committee member and officer in the chain should file a declaration of conflict of interest. As regards payment, publishing works on small margins, and holding back a part of the price or demanding a bank guarantee would keep genuine publishers away. Full payment should therefore be released promptly after acceptance. Instead, the random check of delivered titles described in paragraph 4.1(e) should be completed before acceptance, within a fixed period of, say, thirty days, and the supply order should carry a clause for recovery. If a title is later found to be fabricated, copied or falsely attributed, the amount paid for it should be recoverable from any sum due to the same publisher group, in any library in the State. Where that is not enough, it should be recoverable as arrears of land revenue, as the supply order would provide. The publisher group should also be debarred. Bills should be settled strictly in the order of receipt, and the dates of submission and payment of each bill should be published.

## 5. Contents of the suggested SOP for special libraries

5.1 The SOP would bring together the remedies above in a fixed sequence:

1. A collection plan, with targets by subject, language and level.
2. Empanelment of publishers and distributors, and author declarations.
3. A call for titles, with experts also identifying titles themselves.
4. Automated screening and the market-existence test.
5. Content verification of flagged titles.
6. Scoring by two experts, title by title, on the portal.
7. Selection from the scored list only, with any proposed addition sent back to the experts and a reconciliation statement for each subject.
8. Price fixation by the Book Price Index and online negotiation.
9. Display for thirty days for claims and objections.

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10. Approval by the High Level Committee on a portal-generated compliance report, test-checked by the concurrent auditor.
11. Supply, content check on receipt, full payment after acceptance, and recovery where a title is later found to be fabricated.
12. Publication of the purchase and payment details.

5.2 Each stage would carry its minimum period as in paragraph 4.3, and no stage may be skipped or merged except by a prior order of Government giving reasons, published on the portal.

# Part II: Existing libraries (the Transparent Book Procurement Policy, 2024)

## 6. How the Transparent Book Procurement Policy works

6.0 The Transparent Book Procurement Policy has ensured a fair selection of books for the existing libraries during the two years in which it has been in operation, 2024 and 2025. Reputed publishers, such as Kalachuvadu, have publicly acknowledged this. It is therefore not in need of replacement. What it needs now are further safeguards against a new threat that it was not designed to meet: the intrusion of AI-generated and fabricated books. The suggestions in section 7 are made with that object.

6.1 The Transparent Book Procurement Policy replaced the earlier practice of buying books once in one or two years, which turned largely on the judgement of a selection committee. The 2024 judgment directed that all procurement of books for public libraries be in line with it. In simple terms, it works as follows.

6.2 **Applications:** Under para 3, a dedicated website receives applications from publishers throughout the year, book by book, instead of through a newspaper advertisement. Each book must carry an ISBN, and an application fee is payable for each title to discourage casual applications. Twenty to twenty-five pages are uploaded in digital form for evaluation, and printed copies are submitted for reading and for checking the details.

6.3 **Quality check:** The printed copy is checked against the details given online, and books printed on poor paper are rejected. If the copies later supplied to libraries are of lower quality than the copy submitted, the order is cancelled and the publisher is excluded for three years (para 12).

6.4 **Evaluation:** The views of committee members are compiled through a point-scoring system, so that the result does not turn on one person's taste. Each book is examined by more than one subject expert. A member who has written a book under consideration stays away from its evaluation, and members are rotated every year. Selected librarians and readers' circles also take part in evaluation. Where a reviewer consistently gives marks that are out of line, that reviewer's recommendations are sent to an additional reviewer. These provisions are in paras 4, 5, 7 and 20.

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6.5 **Approved list:** Only books that secure the minimum qualifying mark go on to price negotiation. The approved list is drawn up in the order of total marks, and a selected book remains on it for two years (para 8).

6.6 **Price:** An acceptable price is fixed for each book using the Book Price Index, and books priced above the range are not to be bought. Negotiation is conducted only through the website, and direct negotiation is not permitted (paras 13 and 14).

6.7 **Choice by each library:** Under para 16, each library receives an allocation every quarter, divided by type of book. Its readers' circle, students preparing for competitive examinations and the librarian together choose the books from the approved list on the website, and the readers' circle approves the choice by resolution. The choice must be completed by the end of each quarter. Where a library does not choose, the software selects the highest-scored books.

6.8 **Payment:** Under para 18, funds are placed in an escrow account (a separate bank account from which money is released only on set conditions) before orders are issued. Librarians inspect the books within ten days of receipt. If no books are returned within that time, the payment is released.

6.9 **Unfair practices:** Para 23 lists the following unfair practices noticed in the past:

- changing only the title of a book;
- changing the author's name;
- printing without copyright;
- printing on poor-quality paper;
- supplying photocopied books;
- altering the year of publication;
- publishing one book as two under different titles;
- filling pages with photographs;
- enlarging the type to add pages.

Proven cases attract a ban of five years, and a repeat attracts a permanent ban.

6.10 The Transparent Book Procurement Policy is a sound design for routine purchases. Its gaps lie in what it assumes about the supplier, what it checks inside the book, the time it allows for review, and what it shows the public before money is spent.

## 7. Gaps in the Transparent Book Procurement Policy and suggested remedies

### 7.1 AI-generated and fabricated content

The quality check in para 12 concerns paper, printing and binding. It does not concern what is written in the book. Online evaluation rests largely on the twenty to twenty-five pages chosen and uploaded by the publisher under para 3, and these can be well finished even when the rest of the book is not. **The list of unfair practices in para 23 was drawn up before machine-written**

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**books appeared. It covers changed titles and author names, but not text generated by software and passed off as a person's work, fictitious authors, or text assembled from other books.** As a result, the Transparent Book Procurement Policy does not clearly treat either of the following as an unfair practice, and the penalties in para 23 may not be attracted:

- a book generated entirely by software and attributed to an author who does not exist;
- a book bearing the name of a real author who did not write it.

This is the most serious gap in the Transparent Book Procurement Policy as it stands. The 2024 judgment also found that the condition against purchasing the same book within five years had been "*flagrantly breached*", and that nationalised books were "*re-printed and published under different titles and authors' names and procured every year*".

The checks suggested for special libraries in paragraphs 4.1 and 4.2 may be adopted for the Transparent Book Procurement Policy as well, as follows.

(a) **Declaration:** Every application should carry the publisher's declaration on the use of AI software in writing, translating or editing the book.

(b) **Automated screening:** The twenty to twenty-five pages uploaded by the publisher under para 3 are chosen by the publisher, so they may show the book at its best. Screening should therefore rely mainly on pages chosen at random by the portal from the printed copy submitted for evaluation. These would be scanned solely for screening, under an undertaking of confidentiality. The pages would be compared with all other applications and with digitised nationalised works, and checked with AI-detection tools. A flag only marks the title for closer verification.

(c) **Market-existence test:** Whether the book is actually sold in bookshops or online, and when it was first published, should be verified.

(d) **Verification of authors:** The author check in paragraph 4.2(h) should apply. This includes the automated check against the named author's known works, to detect a book falsely attributed to a real author.

(e) **Content Verification Panel:** Flagged titles should be read by the Panel before they reach the reviewers.

(f) **Five-year rule:** The portal should check every new application against the books bought in the previous five years, both by ISBN and by similarity of text, so that old content under a new title or author name is detected.

(g) **Check on delivery:** The inspection by librarians on receipt should include a comparison with the copy evaluated and a random check of content.

(h) **Red flag by reviewers:** Any reviewer, member of the Content Verification Panel, librarian or readers' circle who finds AI-generated or machine-generated content in a book should be able to raise a red flag on the portal at once. The red flag should have the following consequences.

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- The title is suspended immediately from the approved list and from any pending order, so that no library can choose it while the matter is examined.
- The title is verified thoroughly by the Content Verification Panel and a second subject expert within a fixed period, say fifteen days. The publisher is given notice and an opportunity to explain.
- If the finding is confirmed, the selection score of the title becomes zero and the title is removed from the list permanently. Any order already placed is cancelled, and any amount paid is recovered as provided in paragraph 4.9. The publisher attracts the punitive action under para 23 as enlarged below, and the other titles of the same publisher group are taken up for review.
- If the finding is not confirmed, the title is restored, and the record of the verification is kept on the portal.

(i) **Enlargement of para 23:** Para 23 may be enlarged to include:

- AI-generated or machine-assembled text presented as an author's work;
- fictitious or untraceable authors;
- false attribution of a book to a real author who did not write it;
- text copied or recombined from other works;
- a false ISBN or other false particulars;
- the use of sister imprints to evade a ceiling or a ban.

For these, the penalty should be permanent debarment of the publisher group, recovery of the amount paid as provided in paragraph 4.9, and a criminal complaint.

### 7.2 Qualification of publishers and authors

Para 3 requires only that a book have an ISBN. It does not require that the ISBN belong to the applicant, that the publisher be a registered business with a real place of business, or that the author be a real person. The bans under paras 12 and 23 operate against the applicant, so a publisher with several imprints can continue under another name.

The empanelment of publishers and the declaration of authors suggested in paragraph 4.2 may be adopted for the Transparent Book Procurement Policy also. Linked imprints should be treated as one group for ceilings, scoring and debarment. The list of publishers with not less than 200 titles, which the Directorate is required to maintain under the 2024 judgment, can form the core of the established category.

### 7.3 Time for review

Para 16 of the Transparent Book Procurement Policy fixes quarterly deadlines for libraries to choose their books. There is no corresponding minimum period for reviewers to examine and score the books, and no limit on the number of titles given to a reviewer. Since applications are

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received throughout the year, a backlog can build up and then be cleared in haste. The present calendar also leaves no room for the one-month display directed in the 2024 judgment.

It is suggested that a standard quarterly calendar be fixed:

| Month of the quarter | Activity |
|---|---|
| First month | Applications received up to the cut-off date are verified, screened, and scored by two experts, at not more than twenty titles a week per expert |
| Second month | The provisional approved list is displayed for thirty days for claims and objections |
| Third month | Objections are disposed of, the final list is released, and libraries make their choice and place orders |

Titles that cannot be reviewed within the quarter should be carried forward to the next quarter, and not cleared without review.

### 7.4 Publication of the shortlist for claims and objections

Para 19 of the Transparent Book Procurement Policy only requires that publishers be kept informed and that the books chosen by readers be published every year, after the event. The direction in the 2024 judgment goes considerably further:

> *"Once the books proposed to be purchased are shortlisted, the details will have to be published in a separate web page. It should contain all the relevant details. The book cover should also be displayed. A month's time should be given for eliciting remarks, comments and objections. When procurement for the year is to be finalised, the remarks, comments and objections should be taken into account. They shall remain in the web page and not be deleted."*

The judgment also directed that a dedicated, user-friendly and functional website be maintained and publicised through social media. It also directed that every proposed procurement be notified on the website, and that notice be sent by e-mail to publishers in Tamil Nadu who have published not less than 200 books.

It is suggested that a new paragraph be added to the Transparent Book Procurement Policy, applying equally to the special libraries, to give effect to this direction.

(a) **Details to be published:** For each title on the provisional list: title, author, publisher, ISBN, year of first publication, number of pages, printed price, acceptable price under the Book Price Index, category, average expert score, the cover image and a few sample pages.

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(b) **Place and period:** A separate and permanent page of the procurement website, open for thirty days, which can be searched by title, author and publisher and from which the list can be downloaded.

(c) **Who may object:** Any reader, writer, publisher or librarian, through an online form verified by a one-time password sent to a mobile phone. Grounds may include an untraceable author, copied or machine-generated content, a book not available in the market, a reprint under a new name, or an excessive price.

(d) **Disposal:** Every objection should be acknowledged and should remain visible on the page. A designated committee should decide each objection before the list is finalised and record brief reasons. A title against which a serious objection is upheld should be removed, and the publisher dealt with under para 23.

(e) **Notice:** Each list should be announced on the website and through social media, and e-mailed to the publishers on the Directorate's list.

(f) **After purchase:** The website should show, for each library, the books bought, the number of copies, the price, the supplier, and the dates on which each bill was submitted and settled.

### 7.5 Minimum order quantity for each title

Publishers have complained that some titles on the approved list receive orders for only a few copies, sometimes in single digits. This is natural under the Transparent Book Procurement Policy. Each of more than 4,500 libraries chooses its own books from the approved list (para 16), so demand for many titles is thinly spread. But an order for a handful of copies is uneconomic to print, pack and deliver, and it discourages good publishers from taking part.

It is suggested that a minimum quantity be fixed for each title in the final purchase order, for example fifty copies across all libraries in a quarter. A software loop on the portal may work as follows.

(a) **First round:** Libraries make their choices as at present. The portal then totals the orders for each title across the State.

(b) **Dropping low-quantity titles:** Titles whose total falls below the minimum are dropped from the purchase order for that quarter.

(c) **Release of funds:** The amount each library had set aside for the dropped titles is released back to that library's own quota. It is not pooled or diverted elsewhere.

(d) **Second round:** Each library uses the released amount to choose again, but only from titles that have crossed the minimum quantity in the first round. The portal then issues the final purchase order. Any amount still unspent after the second round would be dealt with as the Transparent Book Procurement Policy now provides.

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(e) **Lower threshold for specialised categories:** A lower minimum may be fixed for categories where demand is naturally small, such as academic titles, documentation editions and books for the visually impaired. Valuable books should not be shut out merely because few libraries need them.

### 7.6 Other matters

Automatic selection under para 16 converts a high score straight into orders. It may be confined to titles that have cleared both expert review and public display, and should not extend to titles of newly empanelled publishers.

The release of payment under para 18, where no books are returned within ten days, covers only physical defects. The inspection should also include a random check of content. A clause in the supply order should allow the amount paid for a fabricated, copied or falsely attributed title to be recovered from any sum due to the same publisher group, or as arrears of land revenue.

Under paras 5, 13, 14 and 22, the Director of Public Libraries constitutes the evaluation, price-sample, negotiation and special-cases committees. These may instead be constituted by Government, from a panel proposed by the Director, with outside members.

Para 22 allows books that sell most on online portals to be nominated as special cases, without the evaluation fee. Online sales rankings can be manipulated. Nominations may be limited to documentation editions, government publications and award-winning titles, and nominated books should also be displayed for objections.

A concurrent audit during each round and an annual social audit through readers' circles may be added, with the results published.

## 8. Summary of suggestions

| Subject | Special libraries (SOP under G.O.(Ms) No.250) | Existing libraries (amendments to G.O.(Ms) No.69) |
|---|---|---|
| Instrument | SOP for one-time collection building, issued with the scheme G.O. for each library | New and amended paragraphs in the Transparent Book Procurement Policy |
| AI-generated content | Declaration, automated screening of randomly chosen pages, market-existence test, Content Verification Panel for flagged titles, check on delivery | Same, relying mainly on pages chosen at random from the printed copy; five-year repurchase check by |

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| Subject | Special libraries (SOP under G.O.(Ms) No.250) | Existing libraries (amendments to G.O.(Ms) No.69) |
|---|---|---|
| | | software; immediate red flag by reviewers, with zero score, removal and punitive action if confirmed; para 23 enlarged |
| Publishers and authors | Annual empanelment in two categories; ISBN in the publisher's name; deposit under the Delivery of Books Act; sister imprints declared; author declaration with automated confirmation for new publishers and flagged titles | Same |
| Time for review | G.O. issued with the construction G.O., at least 24 months before opening; minimum periods totalling 23 months; not more than 20 titles a week per expert | Standard quarterly calendar of review, display and selection |
| Expert scoring | Two independent scores on a rubric; minimum 60; third expert where marks differ widely; no title forward without scores; Selection Committee may filter out but not add titles directly | Rubric and minimum mark added to paras 4 and 5 |
| Price | Net price after discount to fall within the acceptable range under the Book Price Index; imported status only on objective proof; online negotiation only | Para 13 index retained; acceptable price shown in the published list |
| Share of one supplier | Ceiling per publisher group; alerts for unusual patterns | Same |
| Digital record | Lists locked and signed at each stage; full log; untraced titles flagged; security audit | Same |
| Public display | Thirty days, with covers; objections recorded, not deleted, decided with reasons | Same, every quarter |

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| Subject | Special libraries (SOP under G.O.(Ms) No.250) | Existing libraries (amendments to G.O.(Ms) No.69) |
|---|---|---|
| Minimum order quantity | Not applicable; quantities are fixed centrally for each library | Minimum aggregate quantity per title (for example fifty copies a quarter); low-quantity titles dropped by software and the funds re-used by the same library in a second round |
| Payment | Full payment after a content check on delivery; recovery of amounts paid for fabricated titles from other dues or as arrears of land revenue; bills settled in order of receipt and dates published | Same; the inspection under para 18 to include a random content check |

The object of these measures is that the procedure itself should prevent such purchases, without depending on the vigilance of any one officer.

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**G.R.SWAMINATHAN, J.**
**AND**
**M.D.SUMATHI, J.**

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