

STREET VENDORS STRUGGLE FOR LIVELIHOOD

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I. INTRODUCTION

Bollywood movie of 1961 *Tel Malish Boot Polish*, in a classic song *Ek Ana Boot Polish*, Do Ana Tel Malish, summed up the hardships faced by the street vendor. In the song, the vendor charged an 'ana' for polishing shoes and two for a hair massage at his footpath shop in Mumbai. He was proud that he neither stole nor begged but worked hard to earn a living. Even then he is facing lot of problems.

Street vendors are the most socially and economically deprived, and vulnerable sections of the informal workers. Street vendors face problems relating to their public space utilization. They are deprived of their right to livelihood, right to use public places, right to safety, right to trade and their right to dignity. They work in very difficult and unfavourable conditions. They are deprived of legal spaces to carry on their activities. Indian cities are not planned in a way to accommodate street vendors on roads and pavements. All urban plans allot space for public use such as for parks and gardens. But urban planners give no importance for allotment of space for street vending. Most metropolitan cities in India prepared their master plans in the 1960s. Subsequent revisions of master plans have often made things worse rather than enhancing street vendors.ⁱ

Street vendors are treated as irritants to urban planning and organisation. Street vendors are relocated to municipal markets or hawkers' complex. They are transferred to off street markets under the aegis of municipal programmes. Vending and non-vending zones are created for them which are normally designated by the civic or police authorities. The drawback is that these are done in an arbitrary manner. In many cases the interests of street vendors and the needs of consumers are not considered. The authorities deliberately demarcate vending zones in areas that are least likely to have consumers. They are targeted by municipalities and police in the

urban areas as illegal traders, the urban middle class complains constantly on how these vendors make urban life a living hell as they block pavements, create traffic problem and also engage in anti-social activities though more often than not, the same representatives of middle class prefer to buy from street vendors as the goods they sell are cheaper though the quality is as good as those in the overpriced departmental stores and shopping malls.ⁱⁱ

Food and Agriculture Organization and World Health Organization have found that food hawkers in Kolkata are more hygienic than the big three star hotels. They provide 1000 calorie food for Rs. 7 or 10. More than two hundred different types of food are available in Kolkata from street hawkers, giving choice to the poor. Street vendors face different types of livelihood risks because of the legal, physical, and socio-cultural environment. The Report on the Conditions of Work and Promotion of Livelihoods by the National Commission for Enterprises in the Unorganized Sector states that, “The lack of recognition of the role of street vendors culminates in a multitude of problems faced by them such as obtaining licenses, insecurity of earnings, insecurity of place of hawking, gratifying officers and muscle-men, constant eviction threats, fines and harassment by traffic policemen.”ⁱⁱⁱ

The most pressing and ongoing risk for many street vendors is the possibility that the local government authorities, and Municipal Corporation forcibly evict them from the streets or confiscate their merchandise. This risk of displacement often increases in the context of elections, mega-events or efforts to beautify city centres; the eviction and displacement of street vendors in Delhi during the 2010 Commonwealth Games is a testament to this harsh reality. Female street vendors face heightened risks, as they are more likely to operate in insecure or illegal spaces, trade in less lucrative goods, generate a lower volume of trade, and work as commission agents or employees of other vendors. The problems of street vendors are further compounded by the fact that vendors have very little access to social welfare schemes run by the Central & States Government. Since street vendors spend the majority of their working time on open roads, they are vulnerable to different types of diseases like migraines, hyper-acidity, hypertension, tuberculosis and high blood pressure due to pollution. The lack of toilets has an adverse effect on women’s health and many suffer from urinary tract infections and kidney ailments. Mobile female street vendors also face security issues.^{iv}

Street vendors are increasingly regarded as a public nuisance by middle and upper middleclass people who aggressively demand restoration of pavements as public space when street vendors ‘encroach’ on them. Government officials and urban vehicle owners also consider street vendors to be a hindrance, claiming that they clutter the urban space and prevent the smooth flow of traffic. Vendors are accused of depriving pedestrians of their space, causing traffic jams and having links with criminal activities.^v

II. STREET VENDING AS A MENACE

Bromley articulates the sixteen major arguments commonly used against street vending as:

- 1) Street vendors are not evenly spread across the city. They concentrate very heavily in a few locations, and those locations are typically the points with the highest levels of pedestrian and vehicular congestion;
- 2) By contributing to vehicular and pedestrian congestion, street vendors may cause traffic accidents, increase the levels of vehicle-generated air pollution, and impede the flow of police, fire, ambulance and other emergency vehicles;
- 3) Street vending reduces the number of routes available to motor vehicles, it impedes door-to-door deliveries and collections, and it may create access problems for emergency vehicles;
- 4) Street vendors may block the routes of egress from crowded buildings like theatres, stadiums and department stores, increasing the scale of the tragedy in the event of a major fire, explosion, toxic gas escape or mass hysteria;
- 5) Street vendors can and often do “forestall” off-street businesses, attracting potential purchasers as they walk into a concentration of on and off-street business activity;
- 6) Street vendors often fail to give receipts and keep accounts, to pay taxes on their earnings, and to charge sales or value added taxes to their customers;
- 7) Because they can leave or relocate their businesses more easily, street vendors have greater opportunity to swindle their customers and avoid official regulation than vendors in fixed retail establishments;
- 8) Street vendors of food and drink pose major public health problems;

- 9) Street vendors may be less professional, committed, and responsible than off-street vendors;
- 10) Street vendors often include substantial numbers of minors;
- 11) A small minority of street vendors engage in such highly disreputable and often illegal trades as ticket-touting, pimping, prostitution, and the retailing of narcotics;
- 12) Street vendors contribute to the underground economy of undocumented cash transactions, not only through their sales, but also through the bribes they are often required to pay to police and municipal inspectors;
- 13) Through the activity and congestion that they generate, street vendors provide opportunities for pick-pocketing, snatch thefts and armed assaults;
- 14) Some pedestrians and many motorists are disturbed, irritated and even frightened by street vendors solicitations;
- 15) Street vendors are often considered unsightly, they may generate a lot of noise with their announcements, and they and their customers often leave garbage on the streets;
- 16) In orthodox Marxist visions, street vendors are viewed as the epitome of surplus labour and underemployment, inserting additional middlemen into marketing chains, promoting superfluous consumption, and supporting a petty capitalist, competitive ethic.^{vi}

III. PROBLEMS OF STREET VENDORS AT WORKING SITES

Meager Wages: Street vendors earn very meagre wages although they work for almost 14-18 hours a day. Therefore it would be correct to generalize that most street vendors are desperately poor relative to their counterparts in the formal segment of the economy.

Payment of Weekly Bribes or Hafta: A majority of street vendors in Indian cities are unlicensed and therefore officially treated as illegal. A significant proportion of street vendor earnings are taken as bribes by the authorities. *Hafta* or weekly bribe paid by the hawkers on the unlicensed places amount to a staggering 3240 million rupees annually.

Street vendors form informal associations that negotiate with local authorities. This invariably means offering rents (bribes) to the authorities to defend themselves from eviction drives or as a payment for warning them about approaching drives. These associations collect money from their members and pay it as rent to the concerned authorities. In some cases local musclemen,

collect protection fees by threatening them. Their links with the local authorities ensure that those who pay will not be disturbed and those who do not pay will face eviction either by the musclemen or the authorities. National Association of Street Vendors of India (NASVI)'s study of street vendors found that they pay between 10% to 20% of their earnings as rent. In Mumbai the total rents collected amounts to 4 billion annually. In the year 2000, in Delhi, Manushi Trust, a women's organisation, found that 500 million is collected from these people as rents.

Eviction or Confiscation of Goods: Eviction drives are conducted by policemen and wares and goods of the street vendors are confiscated or destroyed. Section 283 of the Indian Penal Code (IPC) permits action against vendors and such other who cause impediments in the free flow of traffic or obstruction to movements of pedestrians on footpaths. Though all sections of the urban population patronise street vendors, the middle and upper income groups are decisive of the problems faced by them. The NGOs representing the elite sections, especially the residents associations of the middle class and upper middleclass, are most vocal about eviction of street vendors from their vicinity.

In large cities like Mumbai, Delhi, Kolkata, Chennai, Bangalore, these associations aggressively argue for restoration of pavements where street vendors earn their livelihood. The constant trade of these elite NGOs claim that street vendors deprive pedestrians of their space, create inconvenience for traffic and encourage anti-social activities. Their employment is full of uncertainty and insecurity. They face constant threat of eviction, exhortation, humiliation and seizure. They are considered as nuisance, criminals, and are frequently evicted by police and the local bodies. They are subject to harassment and struggle in their daily work life. They face unexpected raids. Once their property is confiscated, only after payment of penalty, their seized wares will be returned. At times if their property is destroyed, they have to recover the remains and continue the business or restart their business. They are entailed with heavy fines. They face risk of displacement during times of elections, mega events and even during beautification of cities. These kind of unstable and unpredictable market situations make street vendors less productive.^{vii}

Brutal Action by Police/ Hostile Environment: Street vendors operate in a very hostile environment. The police treat them very badly.

No Legal Recognition and Improper Regulation of Vending: Most of the street vendors operate their business without license. Hence they are treated as illegal. The new Act has provision for giving license to every vendor.

Inability to Access Government Schemes or Facilities: Street vendors mostly consist of migrant population. As they are not permanent residence of the city, they don't possess documents and proofs required for availing government facilities.

Lack of Basic Facilities/ Poor Working Conditions: Street vendors work in very poor working conditions. They don't have access to proper lighting, toilet facilities, drinking water, working space, etc. It can be said that there is a decent work deficit in the working life of street vendors.^{viii}

Low Level of Unionization: The level of unionization is low among street vendors mainly because they feel that they can survive through paying rents rather than forming unions that will fight for their rights. Street vendors organise themselves into trade unions and associations that enable them to continue their activities. Trade unions help vendors get their problems redressed. Although street vending organizations is been in existence for decades, it has not brought much change in the plight of the vendors. These organisations are mainly localised bodies representing street vendors in specific areas of the city. The main problem is that on the whole, only a very few street vendors are unionized. Street vending organizations too face challenges. Street vendors work for long hours and they find it difficult to devote time to the organizations. Organisational strength and voice is not very strong among street vendors. Ahmedabad is an exception where a large number of women vendors are unionised mainly due to the efforts of Self-Employed Women's Association.^{ix}

Negative Impact of On-Line Shopping: Online shopping is a form of electronic commerce whereby consumers directly buy goods or services from a seller over the internet without an intermediary service. Online shopping has become the trend and the new mode of purchasing. There are around 1000 of on-line marketing enterprises selling cosmetics, clothes, shoes, accessories, vitamins, supplements etc. literally the entire range of consumer items. Retail shop

demand will fall and even shrunk. On-line shopping having an adverse impact on the street vending and retail sector.^x

Long Hours of Work: The long working hours have a major impact on the social and family life of street vendors. Long hours work in the unorganised sector beyond the labour and regulatory norms are common in India. Street vendors do not take part in cultural or social activities. The Factories Act, 1948 stipulates that, no adult worker shall be required to work more than 48 hours in a week. But these provisions have been violated continuously.

Lack of Employer - Employee Relationship: Street vendors are mainly un-registered unit. There is a problem of invisibility of such small enterprises. There is a lack of employer-employee relationship.

Lack of Vocational Skills: Street vendors have no choice to opt for other occupation due to the lack of other vocational skills. Street vending is an easy option because it does not require capital and skills.^{xi}

Lack of Awareness: The other important challenge is lack of awareness and knowledge which is a significant barrier to most currently sponsored government social security schemes. Awareness and the level of understanding ensure the beneficiaries to know about the existence of schemes and the benefits which they are entitled. In this regard States should take responsibility of creating awareness about implementation of the programmes. The purpose of the plans or schemes is to provide immediate delivery of benefits to the targeted groups. The presence of large number of schemes creates lots of confusions in the mid of beneficiaries as what exactly they are entitled to. As most of them are not much educated, they are not aware about their rights. They don't understand the legal complexities and don't want to get entangled into complex legal procedures.

Harassment: Street vendors in particular are exposed to harassment by the municipal authorities. Their wares are confiscated on the basis that they will be operating from undesignated places. Street vendors fail to recover confiscated goods from the police. For example, in Harare, there was an incident where the confiscated goods were burnt and women

street vendors are subject to sexual harassment. Street vendors suffering from harassment regularly like misbehaviour of consumers.

Other than these, they receive less care for up-gradation of their technical and business skills. They are deprived of vocational training and capacity building. There is massive overcrowding in their profession due to limited capacity of formal sector to provide jobs.

Trading Sites too small: Street vendors cannot display all of their commodities due to lack of space. They have a common tendency to sit in most accessible and convenient place in front of market so that they can easily magnetize the customers. The issue of street vending can be looked at from a human rights perspective. They have a right to work and the collective right to public space. By its nature, street vending requires some space for people to trade on. In turn this, spatial issue has created tension between the vendors and the public. Street vendors do not have enough space to carry out their business.

Absence of Common Platform for Interaction with Technology: Latest technology can help enterprises reduce cost and time taken to innovative and offer sophisticated product and services. Small micro entrepreneurs in face struggle on account of accessing and using the latest technological advancements. The absence of common platform for interaction with technology provides continues to be the most critical challenge faced by small micro entrepreneurs.^{xii}

Absence of Exclusive Marketing Platform and Distribution Network: With consumer habits changing rapidly and increased competition from both local and global brands street vendors in India are unable to approach marketing platform and distribution network effectively. The main reason is limited knowledge about digital marketing, lack of monetary support, limited enterprise in new age marketing, unaware of technology for marketing, not enough trade fairs and buyer seller meets and losing to large competitors due to lack of networks.^{xiii}

Inadequate Infrastructure: Adequate and modern infrastructure powers the steady growth of a nation's economy. The absence of proper infrastructure cause serious problems to an enterprise daily business operation of manufacturing, consumption and distribution of goods

and services. Poor infrastructure offers businesses at every level and ends up being a deterrent to healthy growth. Lack of proper physical environment and sanitation facilities at work place has an impact on health of the street vendors. The facilities such as washing, urinals, drinking water and toilets are low standard.

They experience poor working conditions. They work under unhealthy, unsafe and unfavourable working environments. They undergo occupational hazards. Vending involves moving from place to place by lifting and hauling heavy loads of goods throughout the day. They lack proper electricity and clean drinking water. Their work environment lack toilets and provision for solid waste disposal because of which they are unable to keep their environment clean. It ultimately results in unhygienic conditions. Also, majority of them live in poor areas which lack access to basic healthcare and welfare services. Anjaria mentions that vending is full of insecurity and uncertainty, since vendors work at the roadside and accidents may occur at any time. They stay in the slums and do not have adequate space for living. Apart from that physical conditions lighting, space, ventilation also low standard. Some of the key infrastructural issued that cause a hindrance to operation of street vending. The biggest challenge continues to be the lack of electricity resource. Availability of electricity is our national demand and government are fail to supply sufficient electricity to public. Street vendors has no access of electricity for lighting at night since their business get momentum after evening and night is the high time for selling goods because people return home from workplace. The street vendors manage their demands of electricity borrow from large shop, rechargeable light, gas lamp, kerosene lamps, etc. Inadequate infrastructure of street vendors also includes insufficient methods of waste management.^{xiv}

Health Problems: Their undesirable working conditions make them vulnerable to poor health and diseases. Street vendors work for very long hours especially for more than 8 hours a day under extreme climate. They work amidst high levels of air and noise pollution, which result in several forms of ailments like hypertension, hyperacidity, or even diseases related to heart and kidney. Often many of these diseases are related to stress due to uncertainty of income. A study of street vendors in Mumbai conducted by SNTD Women's University and ILO during the year 2000 showed that an overwhelming majority of them suffered from ailments related to stress - hyperacidity, migraine, hypertension, loss of sleep etc.^{xv}

Leaving in a Deplorable Condition: street vendors are living in a very unhygienic conditions. They normally stay by making hut in a row. Street vendors battle with various unhygienic conditions like sewer seepage, overflowing drainage system, flooding, storm, and heavy rain.

No Safety and Security: Street vendors are suffering from insecurity in their business in terms of goods and life. Sheds are not available to save goods from sunlight or rain. Direct sunlight deteriorates the quality of their products. In the rainy season street vendors sit idle, wrapping their merchandise with polythene sheets. Sometimes, street vendors cannot conduct business on the streets due to water logging. Another major problem was that the street vendors did not have any kind of storage facility in nearby trading site. Street vendors carry their products every day from a long distance due to absence of storage facilities, they brought small amount of goods with them for sale.^{xvi}

Eviction or Confiscation of Goods: sudden eviction is a night mare for the hawker. It is part of street vending. It is a game between the police and the vendors. Street vendors used plastic or cloth sheets cartoon boxes, push carts wooden or shaded structures to display their goods. It is easy to collect the goods and escape before the police.^{xvii}

Demonetization: After demonetization hitting the country, the hawker's business that had a daily turnover of nearly Rs. 8,000 crore in the country has come own to Rs. 2,000 crore. They need the supply of hard cash for daily transactions. Complaining that their business has declined by 75 percent across the nation due to an acute cash crunch post demonetisation as 50 percent of the street vendors in India do not have bank accounts. Due to sudden and unprecedented demonetization, they have faced unnecessary harassment and sizeable loss of income.^{xviii}

IV. PROBLEMS ASSOCIATED WITH THE FINANCIAL INCLUSION OF STREET VENDORS

Financial inclusion means people should take part of growth activities and helps to increase economic growth of the country. The government wishes that the poor people should benefitted and granting loans to the needy people on regular basis through easily access by rich and poor in the country.^{xix} Street vendors are far away from accessing proper banking services. They face

a lot of problems while going to avail any banking services. There are many reasons which keep the street vendors away from accessing any banking service. The street vendors while going to access any banking service faced various problems are:

Lack of Identity Proofs: Lack of identity documents, proof of address, tenure or legal rights over their place or business and evidence of their trades and professions creates inability of the street vendors to access the formal financial services. Banks hesitate to provide services on the ground that they are unable to provide any legal and valid documents.

Lack of Financial Literacy: There is a lack of financial literacy among street vendors. The street vendors are not aware about savings, credit, insurance etc. Due to lack of knowledge and awareness among street vendors about banking services available to them, they are not able to access banking services.

The Uncertainty of Income: Frequent removal /evacuation of markets make their life more miserable because of uncertainty of income. This affects majorly to those who vend in weekly markets and removal of market for once means loss of income for the whole week. They have no security for their old age thus have to work in order to feed them till they die. Lack of regular substantial income is a major problem.

Low Level of Savings Habit: Street vendors earn enough to satisfy their hunger, however, less to save anything for their future. Due to very low level of savings they stay away from opening any bank account in banks.

No Proper Response from Banks: Street vendors are informal in nature and because of this reason the banks do not pay required attention to street vendors. Because of certain reasons the banks hesitate to provide services to street vendors. Lack of proper response from banks is one of the important reasons of street vendors not willing to access banking services.

No Provisions of Security against Credit: Banks hesitated to provide micro finance to the street vendors on the ground that they are unable to provide security against credit. Street vendors earn to satisfy their hunger, they do not have any valuable property to provide security against credit. Street vendors are very poor section of our society; they often fail to provide the required security against loan.

Lengthy Procedure of Banks: Street vendors work more between eight to twelve hours a day. This does not include another important aspect, namely cleaning of goods before displaying them up for sale. In the case of vegetables, this exercise is extremely important as very few clients would prefer to buy unwashed vegetables. Hence, the number of working hours increases because the cleaning time ranges from one to four hours a day. As they have to spend much time in vending to earn to satisfy their hunger, they stay away from accessing banking services due to lengthy procedure of banks.^{xx}

V. NO SOCIAL SECURITY FOR STREET VENDORS IN INDIA

Street vendors are a part of the unorganized sector. There are no social security schemes directly for the unorganized sector and specifically for the street vendors. Lack of social security forces them to borrow from market for any unforeseen situation and leads them into a debt trap situation. Street vendors lack protection for sickness, unemployment, employment injury, etc. The social security laws granting these provisions are generally applicable only to workers in the formal sector. Access to social security for the street vendors is another major problem.

The concept of social security has been transformed from charity based to right based approach. In fact, access to social security is one of the human rights. Therefore, ideally, everyone, irrespective of the nature of occupation, profession or status, should be a part of some mechanism for enjoying a decent standard of living. However, only about 7% of the total workforce avail the benefits of social security laws, and the rest (93%) belonging to the unorganised sector are actually not getting the benefits because they fail to meet certain technical criteria of law or laws are just not implemented for them. At present, street vendors have to spend out of their meagre incomes for all contingencies such as illness, and in their old age they are helpless. Street vendors adopt informal means such as borrowings, and their continued dependence on such strategies only renders them more vulnerable. Besides, the money spent for the social security in India is very low compared to other developing countries. With due respect to the constraint in budget, the State must strive to achieve the constitutional mandate of at least providing the bare necessities of life by implementing equitable means of distribution. We must not view ill-health or malnutrition as a contingency rather it is a

continuing certainty of life. Therefore, we must appreciate social security as a system to provide overall security for a person in the family and work place. It is appreciable that India of late has taken few initiatives for protecting the street vendors, but the needs are pretty high and the existing schemes are not sufficient.^{xxi}

No Insurance Coverage: They hardly have any protective covers to safeguard themselves and their wares from diminishing because of heat, rain and dust. They are vulnerable to loss of goods by both nature and manmade disturbances. There is no insurance coverage specifically for them in this regard. Street vendors of perishable goods are more vulnerable to losses than vendors of non-perishable. Vendors of seasonal goods must cope with fluctuations in supply and demand over time.

No Financial Assistance: Lack of capital is common issue for street vendors across the country. High rate of interest prevent them to take initiative to expand the business with meagre income. It is difficult for street vendors to repay their loans which forces them in to a debt cycle. The Government of India has some financial assistance projects for poverty alleviation like Micro , Small and Medium Enterprises loan, agricultural loan, farming loan, self-employment loan, cottage industries loan, etc. for poverty alleviation and economic development but no financial arrangement for street vending in urban areas, which are playing significant role in informal economy. NGO's has micro credit programme in urban slums as well as rural areas for income generated activities and self-employment but the street vendors cannot get benefit from those entire programmes. NGO's are interested to deal with women for self-employment. Street vendors are facing the problems of credit from the banks. The banks are not providing the adequate amount of loan. The loan providing process of the banks is very long and formalistic.^{xxii}

Exorbitant Interests for their Loans: Access to capital determines street vendor's economic activities, profits and business growth. Their growth is hindered by limited or no access to formal credit. Street vendors depend on moneylenders and wholesalers for credit for their businesses. Street vendors have scare resources for their trade and need to obtain credit. As private sources charge exorbitant interests for their loans, street vendors have to borrow at a higher interest rate.^{xxiii}

VI. WOMEN AS A STREET VENDOR

Women and children constitutes a major portion of informal sector as a street vendor. Women are trying to live with their dignity and self respect through their hard work. Street vending is an important activity of unorganised sector. Women divorced from her husband, poverty broken families, insufficient income, unemployment are the factors responsible for making women to do street vending.^{xxiv} It is easy to enter this trade rather than other trade. The educated and illiterate women are doing the self-employment for earning money.

VII. CHILDREN AS A STREET VENDOR

Street children are one of the most vulnerable group of urban poor. Life of street children is not a bed of roses. Street children earn money to support their families and themselves. They earn money by begging, carrying or bearing, car washing, juggling, performing music, running errands, sex work, shoe shining or vending etc. The main causes of street vending by children are poverty, illiteracy, child trafficking, unemployment, socio-economic status of children deviance behaviour etc.^{xxv} A number of challenges faced by children at the vending sites are poor physical and social development, risk of sexual abuse, child abuse, exposure to robbery and thieving, kidnapping and accidents, health problems, lack of leisure time, interruption of education, bad working conditions, hunger and starvation, bribe to local authorities.^{xxvi}

VIII. CONCLUSION

For most street vendors, trading from the pavements is full of uncertainties. They are constantly harassed by the authorities. The local bodies conduct eviction drives to clear the pavements of these encroachers and in most cases confiscate their goods. A municipal raid is like a cat and mouse game with municipal workers chasing street vendors away while these people try to run away and hide from these marauders. Confiscation of their goods entails heavy fines for recovery. In most cases it means that the vendor has to take loans from private sources (at exorbitant interests) to either recover whatever remains of his confiscated goods or to restart his business. Besides these sudden raids, street vendors normally have to regularly bribe the authorities in order to carry out their business on the streets. All these mean that a substantive income from street vending is spent on greasing the palms of unscrupulous authorities or to

private money lenders. In fact in most cases street vendors have to survive in a hostile environment though they are service providers. They survive in a hostile environment. They do not have any kind of identity cards for recognition or license to make their presence legal. Most of the studies indicate that a majority of street vendors in Indian cities are unlicensed and therefore officially treated as illegal. Unlike organized sector, this sector have not tasted the benefits or derived the advantages that can be gained from organized. Many of them are victims of invisibility. The difficulty starts from identifying or defining the unorganized sector itself. The large segment of the work force has continued to be neglected even though this sector has a crucial role in economy in terms of employment.

The right to earn livelihood can also be claimed from Court in the absence of any specific legislative framework. Public Interest Litigation are one of the ways to take the livelihood challenges faced by the enterprising poor to Court to expand the benefit of court's decision to a large number of people. In 1989, the Supreme Court held that street vendors have a fundamental right to carry on their trade or business subject to regulation and reasonable restrictions. The Bellagio International Declaration of Street Vendors, 1995 recognizes street vendors as an integral and legitimate part of the urban retail trade and distribution system. The National policy on Urban Street Vendors was adopted in 2004 and revised in 2009 with the objective of providing and promoting a supportive environment for street vendors to earn livelihoods. In 2010, the Supreme Court directed the Government (Center/State) to enact a law by June 2011 to recognize the livelihood rights of street vendors and regulate vending activities. In 2011, the National Advisory Council recommended enacting a Central law. India is a first country in the world which legalize the profession of Street Vendors. The Street Vendors (Protection of Livelihood and Regulation of Street Vending) Act, 2014 is a powerful weapon to protect the rights and to maintain the dignity of the street vendors. The Act is aimed at creating a congenial atmosphere for street vendors to do their business with dignity and is likely to help giving livelihood protection to about 1 crore families. After passing five years of the Street Vendors Act, 2014, law is still at the stage of infancy due to the lack of sensitivity in the officials. The lack of sensitivity of the implementing officials is a main cause for the failure of laws, policies and judgments to reduce and curves the plights of street vendors.

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