



2026:DHC:3329



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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

% ***Date of Decision: 16th April, 2026***

+ W.P.(C) 2136/2024, CM APPL. 8885/2024, CM APPL. 11223/2024, CM APPL. 14653/2024, CM APPL. 21623/2024, CM APPL. 4093/2025, CM APPL. 9627/2025, CM APPL. 35632/2025, CM APPL. 36600/2025, CM APPL. 61011/2025 & CM APPL. 65312/2025

AMIR SINGH

.....Petitioner

Through: Mr. Dayan Krishnan, Senior Advocate with Mr. Sukrit Seth, Mr. Hemant Phalpher and Mr. Karishmit Keswani, Advocates

versus

UNION OF INDIA AND OTHERS

.....Respondents

Through: Mr. Kamal Mehta, Advocate for R-1 and R-2
Mr. Jayant Kumar, Advocate for R-2
Ms. Kumudavalli Seetharaman, Mr. Ujjwal Chaudhary and Ms. Geetika Vyas, Advocates for IOA

CORAM:

HON'BLE MR. JUSTICE AMIT BANSAL

AMIT BANSAL, J. (ORAL)

CM APPL. 61011/2025 (seeking directions)

1. This application has been filed on behalf of the petitioner, *inter alia*, seeking various reliefs, however, the petitioner, for the present, presses only



the following relief:

“A. Direct the Indian Olympic Association to hold the elections to the Athletes Commission of the VFI under the FIVB approved athletes commission regulations as communicated to the IOA; and/or”

2. The applicant/petitioner is a former sports person having played the sport of volleyball at the national level. The applicant is also a recipient of the prestigious Arjuna Award.
3. Pursuant to elections to the Volleyball Federation of India (hereinafter ‘VFI’) ordered by this Court *vide* order dated 9th May, 2025, elections were held to the interim body of VFI.
4. The present application came up before this Court on 13th February, 2026, wherein the statement of Mr. Jayant Kumar, counsel appearing on behalf of the respondent no.2/VFI was recorded that Athletes’ Commission has been duly constituted and affidavit in this regard would be filed.
5. An affidavit dated 17th February, 2026 has been filed on behalf of the respondent no.2/VFI wherein it is stated that Athletes’ Commission has been constituted as per existing statute of FIVB. It is further stated in the affidavit that four members to the Athletes’ Commission were nominated by the Executive Committee of VFI, in addition to four elected members. Accordingly, eight members are a part of the Athletes’ Commission. Out of the aforesaid eight members, four were elected to participate in the Executive Committee of VFI.
6. The main grievance of the applicant is with regard to formation of Athletes’ Commission, which as per the applicant, has not been done by VFI as per the FIVB Regulations as communicated to Indian Olympic



Association (hereinafter 'IOA') in the e-mail communication dated 5th July, 2025.

7. It is submitted that the rules and regulations for constitution of Athletes' Commission were sent by *Fédération Internationale de Volleyball* (hereinafter 'FIVB') to IOA, which have been ignored by the interim body of VFI and instead VFI has made its own rules bypassing the rules and regulations of FIVB and IOA.

8. It has been submitted on behalf of Mr. Jayant Kumar, counsel for VFI that the communication dated 5th July, 2025, on which reliance has been placed by the petitioner, was not addressed to VFI but was addressed to IOA.

9. Taking note of the aforesaid submissions, the case was heard on 10th March, 2026 and counsel were informally asked to obtain clarifications from FIVB though the same was not recorded in the order.

10. At the hearing on 23rd March, 2026, counsel appearing on behalf of the petitioner had shown to the Court certain communications sent by FIVB to IOA as well as to VFI and was directed to place the same on record.

11. On the said date of hearing, Mr. Jayant Kumar, counsel appearing on behalf of VFI had also sought time to put these communications before Executive Committee of VFI to obtain instructions. Pursuant to the aforesaid directions, the communications have been placed on record by way of additional documents.

12. I have heard the counsel for the parties.

13. There are significant differences between the regulations adopted by VFI and the regulations proposed by FIVB for the constitution of the



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Athletes' Commission. Some of the significant differences are noted below:

Particulars	VFI Athletes' Commission Bye-laws	FIVB Athletes' Commission Regulations 2025 [Ann B, Pg. 29, CM No. 61011/2025]
Composition of Commission	<i>The Athletes Commission consists of members, out of which 4 members are elected and 4 members are appointed by the Executive Committee of VFI from the voter list of the Athletes' Commission.</i>	<i>The Athletes' Commission must consist of 8 prominent sportspersons of outstanding merit from the sport of volleyball who are National Arjuna Awardees, Medallist in Olympic, Commonwealth and Asian game [Pg. 31, CM No. 61011/2025]</i>
Eligibility Criteria	<i>Candidates must be active athletes or athletes who have participated in competitions organized by FIVB, Confederations, or VFI within the preceding 8 years, including participation in Olympic Games or FIVB World Championships, and must not have disciplinary or anti-doping sanctions.</i>	<i>Members must be prominent sportspersons of outstanding merit, preferably including Arjuna Awardees of medallists at Olympic Games, Asian Games, or Commonwealth Games, with fallback categories of international on national medallists if such athletes are unavailable.</i>
Nomination Process	<i>Athletes are nominated by State Volleyball Associations/UT units, which may forward names to the VFI Secretary General. The nominated athletes form the voter list for the Athletes Commission election.</i>	<i>The Commission is to be formed from among eligible sportspersons of outstanding merit, ensuring athlete representation independent of federation-controlled nomination structures.</i>

14. The Athletes' Commission bye-laws adopted by VFI restricted the eligibility criteria to such athletes who have participated in competitions in the preceding 8 years. The said bye-laws also provided that the athletes must



be nominated by a State Volleyball Association or UT units. These conditions are not a part of the FIVB Athletes' Commission Regulations.

15. Further, in contrast to the aforesaid VFI bye-laws, FIVB Regulations suggested a tier-wise selection criteria for the composition of the Athletes' Commission. The relevant provision of the Athletes' Commission Regulations, 2025 as approved by FIVB (*Annexure-E to the present application*) is set out below:

The Commission should comprise of:

- A. The Athletes Commission shall comprise of 8 Prominent Sportspersons of outstanding merit from the sport of Volleyball who are National Arjuna Awardees, Medalist in Olympic, Commonwealth and Asian games;
- B. If there are no athletes in Category A, or there are unfilled seats in the Athletes Commission, then The Athletes Commission shall comprise of medalist from major international events of FIVB which are the World Senior or Junior Championships or Asian Senior or Junior Championships or any major Asian Volleyball Confederation events;
- C. If there are no athletes in Category A or B, then The Athletes Commission shall comprise of medalists in National Games of the IOA or Senior National Championships in Volleyball or Beach Volleyball of the VFI;
- D. If there are no athletes in Category A or B or C, then The Athletes Commission shall comprise of participants of Olympic, Commonwealth and Asian games;
- E. If there are no athletes in Category A or B or C or D, then The Athletes Commission shall comprise of participants of major international events of FIVB and/or AVC which are the World Senior or Junior Championships or Asian Senior or Junior Championships.
- F. Out of the 8 prominent sportspersons forming part of the Athletes Commission, it shall be mandatory to have atleast 1 of the following athletes:
 - i. One Female Volleyball Player
 - ii. 1 Male Volleyball Player
 - iii. 1 Female Beach Volleyball Player
 - iv. 1 Male Beach Volleyball Player

16. In terms of the communication dated 20th March, 2026 sent by FIVB to VFI, FIVB has granted provisional recognition to VFI for a period of eight (8) months subject to fulfilment of certain conditions, one of the



conditions was with regard to setting up of Athletes' Commission in line with Indian Law, the FIVB requirements and the joint FIVB-IOA communication dated 5th July, 2025.

17. The relevant extracts from the aforesaid communication dated 20th March, 2026 are set out below:

Grant of Provisional Recognition to the Volleyball Federation of India Interim Leadership

Dear Mr. Kanwar,

The **Fédération Internationale de Volleyball (FIVB)** refers to the recent exchanges concerning the governance status of the Volleyball Federation of India (VFI) – Interim Body and its participation in forthcoming international competitions.

After due consideration, the FIVB hereby grants **provisional recognition** to the Volleyball Federation of India (VFI) – Interim Body for a period of eight (8) months from the date of this letter. Such recognition is granted strictly on a temporary and conditional basis and is subject to the following conditions:

- (a) the VFI interim leadership shall cooperate fully and in good faith with the FIVB, the IOA, the Ministry of Youth Affairs and Sports (MYAS), and the Steering Committee duly constituted by the FIVB.
- (b) the VFI interim leadership updates the VFI Statutes in line with the FIVB Constitution and regulations and the IOA Constitution and regulations, annexed as Annex 1.
- (c) the VFI interim leadership shall ensure that the selection of national teams for all FIVB-recognised competitions is undertaken exclusively by a Selection Committee established by the Steering Committee composed of national team coaches and technical experts. The Selection Committee shall operate independently and without any interference either from the VFI interim leadership or any other third parties appointed by VFI Interim leadership.
- (d) the VFI interim leadership shall support FIVB and Volleyball World in relation to the hosting and organisation of international volleyball events in India.
- (e) the VFI interim leadership shall ensure that national and state-level election(s) are conducted fairly, transparently, and in compliance with applicable law and principles of good governance. The IOA / FIVB Steering Committee shall nominate an observer for such elections.
- (f) the VFI interim leadership complies with the attached deadlines and roadmap for recognition. (Annex II – full recognition roadmap).

This provisional recognition is granted solely and exclusively to facilitate the release and utilisation of the Government funding due to VFI, for the preparation, training, and participation of Indian national volleyball teams in forthcoming international competitions, both in India and overseas.



The FIVB provisionally recognises that the VFI interim leadership is mandated with the following specific tasks:

- 1) Create an Athletes' Commission in line with Indian law, the FIVB requirements and the joint FIVB–IOA communication dated 05 July 2025.
- 2) update the VFI Statutes in line with Indian law, the FIVB Constitution and regulations and the IOA Constitution and regulations;
- 3) regularise the governance situation of the state associations and
- 4) Conduct new elections of the VFI, as per the roadmap in Annex 2.

Failure to comply with any of the above conditions, including failure to meet the prescribed timelines, or the issuance of any adverse judicial or statutory order affecting the legality or authority of VFI's interim leadership, shall entitle the FIVB, at its sole discretion and without prejudice to any other rights, to suspend or immediately revoke this provisional recognition.

The FIVB expects VFI to treat this opportunity with utmost seriousness and to ensure full compliance within the stipulated timelines in the interest of Indian volleyball and its athletes.

Please acknowledge receipt of this letter and confirm your acceptance of the above conditions in writing within seven (7) days.

18. In the communication dated 20th March, 2026 sent by FIVB to IOA, FIVB confirmed the establishment of a Steering Committee to ensure institutional coordination between the FIVB, IOA, and the VFI interim leadership. On the same date, another communication was sent by IOA to VFI calling upon them to adhere to the conditions as communicated by FIVB including the condition relating to establishment of an Athletes' Commission in compliance with applicable regulations, jointly provided by FIVB and IOA, *vide* email dated 5th July, 2025.

19. In the undated response sent by VFI to FIVB, VFI has stated that it has already constituted an Athletes' Commission as per decision of this Court and in accordance with FIVB Regulations. The relevant extracts are set out below:

"13.2 Constitution of Athletes' Commission:-

13.2.1 VFI has already constituted Athletes' Commission as per the



decision of the Hon'ble Delhi High Court and in accordance with the applicable FIVB regulations. Furthermore, the said matter is currently sub-judice before the Hon'ble Delhi High Court and the VFI will act in accordance with the judgement/directions of the Court.”

20. In light of the subsequent communications placed on record, there is no ambiguity at all with regard to the stand of FIVB that the Athletes' Commission has to be established in terms of what was communicated by FIVB *vide* communication dated 5th July, 2025.

21. It cannot be disputed that FIVB is the international regulatory body for the sport of volleyball and the VFI as the National Sports Federation is required to follow the regulations of FIVB so as to ensure that Indian athletes continue to participate in all international sporting events relating to volleyball including Asian Games and Olympics. Even in terms of the Section 15 of the newly enacted National Sports Governance Act, 2025, National Sports Organisations are required to follow the rules, regulations and bye-laws of international sports bodies.

22. From the submissions advanced by Mr. Jayant Kumar, counsel for the respondent no.2/VFI, this Court cannot discern any plausible justification for VFI not following the regulations of FIVB. The said regulations have also been approved by IOA which is the apex governing body for Olympic sports in India.

23. Accordingly, this Court is of the view that VFI has to adopt the rules and regulations which have been forwarded by FIVB for setting up of the Athletes' Commission.

24. In light of the above, a direction is issued to VFI must adopt the



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aforesaid regulations and constitute the Athletes' Commission in accordance therewith. The election to the Athletes' Commission shall be held within a period of six (6) weeks.

25. In order to ensure fairness of the elections, it is directed that the Union of India as well as IOA shall appoint an observer.

26. List for consideration of remaining reliefs on 20th July, 2026.

AMIT BANSAL, J

APRIL 16, 2026

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