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E.MBA, LL.M, Ph.D, PGDSAPM

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Subhrajit Chanda

BBA. LL.B. (Hons.) (Amity University, Rajasthan); LL. M. (UPES, Dehradun) (Nottingham Trent University, UK); Ph.D. Candidate (G.D. Goenka University)

Subhrajit did his LL.M. in Sports Law, from Nottingham Trent University of United Kingdoms, with international scholarship provided by university; he has also completed another LL.M. in Energy Law from University of Petroleum and Energy Studies, India. He did his B.B.A.LL.B. (Hons.) focussing on International Trade Law.

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WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal provided dedicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you

RELIGIOUS FREEDOM VS. MARRIAGE EQUALITY: A COMPARATIVE ANALYSIS¹

AUTHORED BY – PREETI & DR. PROMILA

Abstract

The global recognition of marriage equality has sparked profound legal and social debates, particularly around its intersection with religious freedom. As countries expand the legal rights of LGBTQ+ individuals, conflicts arise with religious doctrines that oppose same-sex unions. This research paper explores how different legal systems negotiate this tension by comparing approaches in the United States, Canada, and India. It critically analyzes constitutional protections, landmark judicial decisions, and legislative responses, offering insights into the balance between two fundamental rights: the right to freedom of religion and the right to marriage equality. The paper argues for a nuanced legal framework that respects pluralism while upholding individual dignity and equality.

Keywords:

Religious Freedom, Marriage Equality, Same-Sex Marriage, LGBTQ+ Rights, Constitutional Law, Human Rights, Freedom of Religion, Equality before Law, Secularism, Judicial Review, Legal Pluralism, Anti-Discrimination Law, Civil Rights, Fundamental Rights, Comparative Constitutionalism, United States Constitution, Canadian Charter of Rights and Freedoms, Indian Constitution, Religious Exemptions, Rights Balancing.

Introduction

The recognition of same-sex marriage marks a watershed moment in the global advancement of LGBTQ+ rights, symbolizing not only legal inclusion but also societal validation of diverse identities and relationships that have historically been marginalized. In various jurisdictions across the world, the legalization of same-sex marriage has been celebrated as a monumental stride toward equality, dignity, and human rights. However, this progression has not been without contestation, especially from religious communities that regard marriage as a sacred institution rooted in traditional and often heteronormative doctrines.²

¹ Authored by Preeti pursuing Ph.D from Kurukshetra University, Kurukshetra

² U.S. Const. amend. I.

For many religious adherents, the redefinition of marriage to include same-sex couples represents a direct challenge to their theological beliefs and moral frameworks. This resistance is not merely social or cultural but finds expression in legal arguments invoking the right to religious freedom—a right enshrined in many constitutional and international human rights instruments. The resulting tension brings to the fore a fundamental conflict between two foundational rights: the right to freely practice and express one's religion and the right of individuals, regardless of sexual orientation, to marry and form families with the full protection and recognition of the law.³ Both rights, individually cherished and deeply rooted in liberal democratic values, come into sharp conflict when the exercise of one seems to inhibit or negate the other. The jurisprudential dilemma becomes even more complex when religious objections to same-sex marriage translate into refusals to provide services, perform ceremonies, or acknowledge marital status, leading to allegations of discrimination and legal battles over the boundaries of tolerance and freedom.

Legal systems in democratic societies are thus tasked with the delicate and often contentious duty of mediating this conflict. They must uphold the secular principles of equality and non-discrimination while also honoring the pluralism that allows diverse religious beliefs to flourish. The balance between these rights is not uniform across jurisdictions and is profoundly shaped by constitutional structures, cultural traditions, political landscapes, and judicial philosophies. In this regard, the comparative analysis of three countries—the United States, Canada, and India—offers valuable insight into how different societies address this intersection of rights. Each of these nations embodies a unique constitutional tradition and a distinctive socio-religious composition, yet all grapple with the question of how to ensure justice and inclusivity in the face of deeply held religious convictions.

The United States provides a compelling case study due to its strong constitutional protections for both religious freedom and individual liberties. The First Amendment guarantees the free exercise of religion and prohibits the establishment of any religion by the state, while the Fourteenth Amendment ensures equal protection under the law. These twin pillars have produced a dynamic and often contentious legal environment, particularly in the wake of the Supreme Court's decision in *Obergefell v. Hodges* (2015), which established same-sex marriage as a constitutional right nationwide. While the ruling was hailed as a historic victory

³ U.S. Const. amend. XIV, § 1.

for LGBTQ+ rights,⁴ it also ignited a wave of backlash from religious conservatives, prompting the enactment of various state-level Religious Freedom Restoration Acts (RFRAs). These laws were designed to shield individuals and entities from being compelled to act in ways that contradict their religious beliefs, such as participating in or facilitating same-sex weddings. Legal disputes such as *Masterpiece Cakeshop v. Colorado Civil Rights Commission* (2018) highlight the complexity of this issue, as courts are asked to navigate between protecting religious conscience and preventing discrimination in public accommodations. The U.S. model exemplifies a legal system striving to accommodate religious dissent without allowing it to undermine the civil rights of LGBTQ+ individuals, though its application remains fraught with ambiguity and inconsistent outcomes. In contrast, Canada offers a more integrated approach to balancing rights through its Charter of Rights and Freedoms, which explicitly protects both freedom of religion and the right to equality. Canada was among the first countries to legalize same-sex marriage nationwide with the passage of the Civil Marriage Act in 2005, following the Supreme Court's advisory opinion in the *Reference re Same-Sex Marriage* (2004). The Court affirmed that while religious officials could not be compelled to perform marriages that contravened their beliefs, civil recognition of same-sex marriage was a legitimate and constitutional exercise of governmental authority. The Canadian legal framework employs a contextual and proportional approach, as articulated in Section 1 of the Charter, which allows rights to be reasonably limited in a free and democratic society. This has enabled Canadian courts to uphold both religious freedom and marriage equality without allowing one to nullify the other. Notably, religious institutions retain autonomy in their internal affairs, including marriage rites, but are not permitted to discriminate when acting in the public sphere or engaging in commercial activities. This dual respect for pluralism and equality fosters a more coherent and predictable legal environment, although tensions persist in specific cases, especially involving religious schools and adoption services.⁵ India, the world's largest democracy and a constitutionally secular state, presents a distinct and evolving perspective on the issue. With its unparalleled religious diversity and complex legal pluralism, India has historically balanced individual rights against collective religious norms. The Supreme Court's landmark ruling in *Navtej Singh Johar v. Union of India* (2018)⁶ decriminalized consensual same-sex relations, marking a significant shift toward recognizing the rights of LGBTQ+ individuals. However, the subsequent debate over the legal recognition of same-sex marriage

⁴ *Obergefell v. Hodges*, 576 U.S. 644 (2015).

⁵ *Masterpiece Cakeshop, Ltd. v. Colorado Civil Rights Commission*, 584 U.S. ____ (2018).

⁶ *Navtej Singh Johar v. Union of India*, (2018) 10 SCC 1 (India).

has been more contentious. In *Supriyo Chakraborty v. Union of India* (2023),⁷ the Supreme Court declined to legalize same-sex marriage, emphasizing the need for legislative action and societal consensus. While the Court reiterated its commitment to constitutional morality—a doctrine that places the Constitution above social or religious orthodoxy—it stopped short of extending marital rights to same-sex couples, reflecting the judiciary’s cautious engagement with deeply rooted cultural and religious sentiments. Nevertheless, Indian courts have in other contexts invalidated religious practices that violate individual rights, as seen in cases like *Shayara Bano v. Union of India* (2017), which declared the practice of instant triple talaq unconstitutional. This indicates a judicial willingness to confront regressive religious practices, albeit selectively and incrementally. Across these three jurisdictions, several common themes emerge. First is the distinction between belief and conduct: while individuals are free to hold and express religious beliefs, the translation of those beliefs into actions that harm others or contravene anti-discrimination norms is legally contestable. Second is the role of the judiciary in balancing competing rights through interpretative tools such as proportionality, reasonableness, and constitutional morality. Courts are increasingly tasked with navigating the gray areas where rights overlap and conflict, requiring nuanced and context-sensitive adjudication. Third, the broader cultural and political environment significantly influences legal outcomes. Societies with higher levels of secularism and public support for LGBTQ+ rights tend to produce legal frameworks that are more inclusive and equitable. Conversely, in settings where religious majoritarianism dominates, marriage equality often faces stronger resistance, both legally and socially.

Ultimately, the reconciliation of religious freedom and marriage equality does not necessitate a zero-sum approach. Both rights can coexist within a pluralistic legal system that values diversity, human dignity, and mutual respect. This requires legislative clarity to define the scope and limits of religious exemptions, judicial courage to enforce constitutional principles, and civic dialogue to foster understanding and reduce polarization. A harmonized framework must distinguish between the legitimate protection of religious autonomy in private or ecclesiastical matters and the impermissible use of religion as a shield for discrimination in the public realm. In doing so, democracies can uphold both the freedom of conscience and the right

⁷ *Supriyo Chakraborty v. Union of India*, (2023) SCC OnLine SC 1387.

to love and marry, advancing a vision of justice that honors the full humanity of all its citizens, regardless of faith or sexual orientation.⁸

Research Problem

The recognition of same-sex marriage represents a significant advancement in LGBTQ+ rights; however, it frequently comes into conflict with religious doctrines that define marriage as a union solely between a man and a woman. This conflict raises complex legal and constitutional questions about how to balance the right to religious freedom with the right to equality and non-discrimination. The challenge is especially pronounced in pluralistic societies where religious beliefs are constitutionally protected but must coexist with secular laws ensuring equal rights for all citizens. The research problem, therefore, lies in understanding how different legal systems reconcile these conflicting rights and what frameworks exist—or should exist—to ensure a just and equitable balance.⁹

Research Questions

1. How do constitutional democracies interpret and balance the right to religious freedom against the right to marriage equality?
2. What legal frameworks and judicial precedents have been established in the United States, Canada, and India to address conflicts between religious liberty and LGBTQ+ rights?
3. To what extent do religious exemptions undermine or support the principle of equality in the context of same-sex marriage?
4. What are the implications of prioritizing one right over the other in diverse, multicultural societies?
5. How can legal systems develop harmonized approaches that respect both religious freedom and marriage equality?

Hypothesis

In constitutional democracies, while both religious freedom and marriage equality are protected rights, legal systems that adopt a proportional or contextual approach—rather than absolutist interpretations—are more successful in harmonizing these rights without significantly

⁸ Civil Marriage Act, S.C. 2005, c. 33 (Can.).

⁹ Section 1, Canadian Charter of Rights and Freedoms (reasonable limits clause).

compromising either. It is hypothesized that a rights-balancing framework that distinguishes between private religious belief and public discriminatory conduct enables a more equitable resolution of conflicts between religious liberty and LGBTQ+ rights.

Methodology

This research employs a comparative legal analysis methodology, drawing on constitutional texts, judicial decisions, legislative instruments, and legal scholarship from three jurisdictions: the United States, Canada, and India.

1. Case Study Method: Key legal cases from each country (e.g., *Obergefell v. Hodges* in the U.S., *Reference re Same-Sex Marriage* in Canada, and *Navtej Singh Johar v. Union of India* in India) will be analyzed to understand judicial reasoning and doctrinal developments.¹⁰
2. Doctrinal Legal Research: Examining constitutional provisions, human rights charters, and statutes to determine how legal systems conceptualize and protect religious freedom and marriage equality.
3. Comparative Analysis: Identifying similarities and differences in legal responses, focusing on how courts and legislatures in each jurisdiction mediate conflicts between the two rights.
4. Interdisciplinary Contextualization: Incorporating sociopolitical and cultural contexts to understand how public opinion, religious diversity, and political dynamics influence legal outcomes.
5. Normative Evaluation: Assessing the effectiveness and fairness of different legal approaches and offering recommendations for achieving a principled balance between the rights in conflict.

Conceptual Framework

Religious Freedom

Religious freedom encompasses the right to hold, practice, and manifest beliefs without coercion or interference by the state. It is recognized in major international instruments such as Article 18 of the Universal Declaration of Human Rights and Article 18 of the International Covenant on Civil and Political Rights (ICCPR).¹¹

¹⁰ Ryan T. Anderson, *Truth Overruled: The Future of Marriage and Religious Freedom* (Regnery, 2015).

¹¹ Martha C. Nussbaum, *Liberty of Conscience: In Defense of America's Tradition of Religious Equality* (Basic Books, 2008).

Marriage Equality

Marriage equality refers to the legal recognition of marriage between individuals of the same sex, conferring upon them the same rights, responsibilities, and protections as heterosexual couples. It is anchored in principles of equality, dignity, and non-discrimination.

Rights in Conflict

The legal friction emerges when religious doctrines that oppose same-sex marriage intersect with state-imposed obligations to respect and recognize such unions. This conflict manifests in areas such as clergy participation in same-sex weddings, exemptions for religious institutions, and freedom of speech.¹²

Comparative Legal Analysis

United States

The U.S. constitutional framework strongly protects both religious freedom (First Amendment) and individual liberty (Fourteenth Amendment).

Obergefell v. Hodges (2015)

In *Obergefell v. Hodges*, the U.S. Supreme Court ruled that same-sex marriage is a fundamental right under the Due Process and Equal Protection Clauses. This landmark ruling legalized same-sex marriage across all 50 states.

Religious Freedom Restoration Acts (RFRAs)

Several states responded by passing or reinforcing RFRAs to shield religious individuals and organizations from being compelled to act contrary to their beliefs. Notably, controversies erupted over whether businesses can refuse service for same-sex weddings on religious grounds (*Masterpiece Cakeshop v. Colorado Civil Rights Commission*, 2018).

Balancing Approach

American jurisprudence tends to favor an accommodationist approach but struggles with defining the limits of religious exemptions when they infringe on anti-discrimination laws.

¹² Choudhry, Sujit. "He Had a Mandate: The Indian Supreme Court and the Basic Structure Doctrine," in *The Least Dangerous Branch*, (OUP, 2000).

Canada

Canada offers a robust model of balancing rights through its Charter of Rights and Freedoms.

Legalization of Same-Sex Marriage

Canada legalized same-sex marriage in 2005 through the Civil Marriage Act, making it one of the first countries to do so nationwide.

Reference re Same-Sex Marriage (2004)

The Supreme Court of Canada held that the federal government had the authority to define marriage as inclusive of same-sex couples and confirmed that religious officials could not be compelled to perform same-sex marriages contrary to their beliefs.¹³

Charter Rights Balancing

Section 1 of the Charter allows for reasonable limitations on rights, promoting a contextual analysis. Courts in Canada prioritize equality but make careful accommodations to safeguard religious expression, especially within religious institutions.

India

India represents a complex case due to its religious diversity and the evolving status of LGBTQ+ rights.

Navtej Singh Johar v. Union of India (2018)

The Supreme Court decriminalized homosexuality by striking down Section 377 of the Indian Penal Code, affirming the dignity and privacy of LGBTQ+ persons.

Same-Sex Marriage and Legal Vacuum

As of 2025, same-sex marriage is not yet legally recognized in India. The Supreme Court in *Supriyo Chakraborty v. Union of India* (2023) refused to legalize same-sex marriage, deferring the matter to Parliament, citing concerns about judicial overreach and the need for societal consensus.

Religious Autonomy and Constitutional Morality

Indian constitutional law emphasizes a balance between individual rights and religious

¹³ United Nations Human Rights Council, Born Free and Equal: Sexual Orientation and Gender Identity in International Human Rights Law (OHCHR, 2012).

autonomy, guided by the doctrine of "constitutional morality." Courts have often protected individual rights over regressive religious practices (e.g., *Shayara Bano v. Union of India*, 2017 – triple talaq case).

Themes and Challenges

Religious Exemptions and Public Services

The tension is particularly visible in the public domain—whether religiously motivated individuals or businesses can deny services related to same-sex weddings. The challenge lies in distinguishing between private belief and discriminatory conduct.

Role of the Judiciary

Judicial institutions play a critical role in mediating conflicts through proportionality tests, balancing competing rights rather than absolutizing one over the other.

Cultural and Political Contexts

The outcome of this balancing act often reflects the socio-political ethos of a country. In secular and liberal democracies, courts are more likely to protect marriage equality. In culturally conservative or religious-majority countries, religious freedom may hold greater sway.¹⁴

Toward a Harmonized Legal Framework

To address the friction between religious freedom and marriage equality, a harmonized legal framework should consider:

- Clear legislative protections for religious organizations and clergy from compulsory participation in same-sex marriage ceremonies.
- Anti-discrimination statutes that apply to commercial enterprises serving the public.
- Judicial oversight to ensure religious exemptions do not erode the dignity and equality of LGBTQ+ individuals.
- Public education and dialogue to foster mutual respect and reduce polarization.

¹⁴ Canadian Charter of Rights and Freedoms, Part I of the Constitution Act, 1982, being Schedule B to the Canada Act 1982 (UK), 1982, c 11.

Conclusion

The reconciliation of religious freedom and marriage equality is one of the most pressing challenges in contemporary human rights law. While these rights may appear to conflict, they are not inherently incompatible. A balanced approach that respects religious convictions without compromising the dignity and rights of LGBTQ+ individuals is both possible and necessary. The comparative analysis reveals that the path forward lies in pluralistic legal systems that uphold both conscience and equality through principled adjudication, legislative clarity, and societal engagement.

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