

# What Is Behind Film Censorship? The *Khalnayak* Debates

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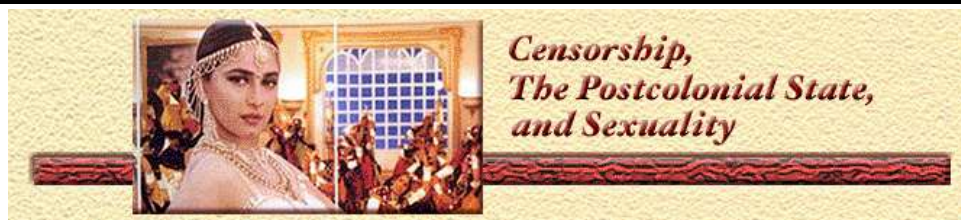
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1. My research into recent Indian censorship debates reveals that battles over national identity are continuously waged on the terrain of sexuality; it is the female body which is overtly and overly marked as the sexual body. Both the proponents and opponents of censorship have argued whether the representation of sexuality was a part of Indian tradition.[\[1\]](#) They question whether "double-standards" for judging Indian vs. foreign films maintained Indian values, preserved colonial puritanism, or reinforced a patriarchal status quo. They also question whether national prudishness in any way affected the state's (and a portion of the public's) much desired goal -- to be modern and democratic. These debates demonstrate that sexuality is central to the construction of national identity.
2. In this article, I will focus on the formative role that the Bombay film industry has played in the social organization of sexuality in India. An important state mechanism for regulating the social organization of sexuality, censorship has been a key point of contact between the

postcolonial Indian state, the Bombay film industry, and the Indian citizenry.



3. Aruna Vasudev's *Liberty and License in the Indian Cinema* characterizes censorship as an act of prohibition that is dictated by the state (Vasudev 1978 pp. ix-xv). This characterization of censorship suggests a limited understanding of power. It presumes that the exercise of power is uni-directional; that is to say, the state is the only actor who exercises power. While undoubtedly the play of power is conducted on an uneven ground, power, as Foucault thoughtfully reminds us, is a relation, not a possession (Foucault 1977, 26-27). In the theatre of censorship, power is exercised by the state, the film industry and the citizenry in relation to one another. This play of power is not simply repressive. Rather, it (re)produces rules, practices parameters of debate, categories and subjects; in short, it produces the discourse of censorship.
4. By reconceptualizing censorship as a productive activity à la Foucault, I show that the Indian state is not an all-powerful actor in the theatre of censorship. Instead, I examine the play of power among the Indian state, film industries, and citizenry in order to show that the debates on sexuality in India *produce* sexuality in as much as they call for their control. In the following pages, I offer an analysis of a Hindi commercial film, *Khalnayak/The Villain* (1993; produced by Subhash Ghai and Mukta Arts), concentrating on a popular song from the film, 'Choli ke peeche kya hai.' In the process, I hope to re-theorize censorship as a productive activity.



5. In the domain of Indian popular culture in 1993, the film song 'Choli ke peeche kya hai' (What is behind the blouse?) in *Khalnayak* plunged the nation into a debate about morality. The lyrics of the song stood accused of transmitting improper sexual mores. Following common market practice, TIPS, an established music company primarily

involved in the film-music industry, released the audio cassette for *Khalnayak* featuring the tantalizing song 'Choli ke peeche kya hai' while the film was still in production. In India, the success of a popular film is often connected to the popularity of its music (Chandravarkar 1983; Mannan 1993; Prakash 1983).<sup>[2]</sup> The audio cassettes and music-videos not only serve as advertisements for the film, but also generate profits for the music companies; these profits are often passed along to the film producers. In the last decade, the music industry has both expanded and flourished. As country-wide street sales of audio-cassettes have drawn close to Rs (Rupees) 5 billion annually, composers and music producers have been happily singing all the way to the bank. Approximately 150 Hindi music titles are released every year, with all-India sales estimated at 1 million cassettes a day -- inclusive of piracy. 'Choli ke peeche kya hai' could be heard on the radio and boom-boxes, and seen on the 'top-ten' shows in the form of music-videos created from publicity clips of *Khalnayak*.

6. In a letter written to the Ministry of Information and Broadcasting, Pandit Gautam Kaul, a concerned citizen, enumerated the adverse effects of the mushrooming music industry. In its new avatar as a major commercial film financier, the music industry had transformed the practice of commercial filmmaking, in particular, the production and distribution of songs. Kaul catalogued the detrimental effects resulting from this transformation:

Recording of songs are completed even before the film goes into production and recording companies, without waiting for the release of the film, exploit the songs as investments. It is also noticed that there are some cases now where the songs of a movie announced for production proved immensely popular and the film remained unknown even after its release. There are possibilities that a full album of songs can be released, and the film may never be made. In such cases, the songs would be given nomenclature as 'private songs' (Kaul 1993).

7. For Kaul, these *new* forms of production and distribution of film songs warranted immediate attention because they were circumventing state scrutiny. He suggested that the state tackle this issue by compelling producers to submit film songs to Examining Committees before their release and by creating offices for the certification of private and film music to regulate the burgeoning music industry (Kaul 1993).<sup>[3]</sup> Kaul's letter provides us an instructive lesson about the nature of power: simply put, power is not unidirectional. While state-censorship (in)forms film-making, practices of film production and distribution also have an impact on state censorship. In the process of drawing attention to the implications of a growing music industry for

the practice of censorship, Kaul unwittingly demonstrated how technology, namely audio cassettes, revealed the limits of state authority. As a medium which was not subject to state censorship, audio cassettes could circulate and carry potentially subversive or, as Kaul feared, *vulgar* messages freely.



8. As 'Choli ke peeche kya hai' circulated in the form of audio cassettes, R. P Chugh, an advocate and a Bhartiya Janata Party (BJP) supporter,[\[4\]](#) was among the many who heard the song. He filed a legal petition in Delhi alleging the song

is obscene, defamatory to women community and is likely to incite the commission of offence. The song is grossly indecent and is being sung through cassettes at public places, annoying the people at large, the undersigned specially. (R. P. Chugh 1993)

The veiled sexual reference made the song, in Chugh's eyes, not only obscene but derogatory to women. What increased his annoyance was the song's unhindered circulation in public. Chugh's cluster of complaints drew together three specific assumptions about sexuality, assumptions which are common to patriarchal discourse in India: first, that sexuality is obscene; second, that sexual references dishonor women; and third, that sexuality's entry into public space disrupts social boundaries. Chugh's petition was a means for seeking redress against such affronts.

9. Let us consider how Chugh lodged his complaint. Instead of voicing his dissent by other means such as a letter to a newspaper or magazine, Chugh filed a legal petition which produced a juridical relation among Chugh, the court, and the addressees of the complaint. Such a relation constructed Chugh as a juridical subject and citizen who by calling upon the court to adjudicate, hailed the court as arbitrator in a dispute against other subjects, namely, 'the defendants' who included TIPS Cassettes, the Central Board of Film Certification, Subhash Ghai & Mukta Arts, and the Ministry of Information & Broadcasting. In short, the legal petition both drew upon and reproduced a legal-judicial apparatus that is constitutive of the state.

10. As a juridical subject, Chugh made four requests. First, he called upon Subhash Ghai, the film's producer, and the censors to delete the song from the film. Second, he demanded that TIPS, the music company, be restrained from selling audio cassettes of the song. Third, he requested that the Board put a prior restraint on the exhibition of *Khalnayak* until the song was deleted. Fourth, he asked that the Ministry of Information and Broadcasting not allow the song to be aired on state-run television. Chugh's requests reveal that in the theatre of censorship, multiple entities are involved in the play of power.
11. What are the effects of a scenario in which multiple entities are involved in the play of power in general, and the act of cutting in particular? While the censors could excise 'Choli ke peeche kya hai' from the film *Khalnayak*, the Central Board of Film Certification had no authority to prohibit the sale of its audio cassettes; it could only exercise authority over *films* as stated in the *Cinematograph Act of 1952*. Technology, in this case the audio cassettes, revealed the limits of the Certification Board's authority. Another instance which demonstrated the limits of the Board's authority was Chugh's request to the Ministry of Information and Broadcasting.<sup>[5]</sup> The regulation of state-television was a task allocated to the Ministry of Information and Broadcasting, not the Central Board of Film Certification. This meant that Chugh had to contend with another technology, namely, television, and the quirks of another authority, the Ministry of Information and Broadcasting.
12. The advent of liberalization in the nineties added a new twist to Chugh's request to prohibit the song from state-television. The rise of satellite television and innumerable private cable channels not regulated by the state meant that even if programs were prohibited on state-television, viewers could easily watch them on private channels. These new technologies revealed the fragility of national boundaries and state authority. Fortunately or unfortunately, in this case neither the status of state authority nor the court's ability to be a just arbitrator was tested severely. On the day of the trial, R. P. Chugh failed to arrive in court on time and the case was dismissed. Drawing upon Foucault's insights, we can see in this comic turn of events the subordination of law to order. In this case, it was not justice but the clock which prevailed.



13. Although the case was not successful in legal terms, it succeeded in stirring up a public debate on the representation of sex in cinema. [6] Shakti Samanta, the chairman of the Central Board of Film Certification in Bombay, received approximately two hundred letters [7] for and against the deletion of the song from the film and from its trailer. [8] Among those who wrote letters were members of the Hindu-nationalist BJP. In a letter supporting Chugh's petition, the President of the Women's Wing of the BJP in New Delhi wrote:

'Choli ke peeche kya hai' is an obscene song and as a result of which new anti-social elements have got the excuse of singing this song on seeing girls. Many incidents of eve-teasing [9] have occurred. The film song singers only just to earn money are shamelessly singing such type of songs which are against the public interest. (President of the Women's Wing 1993.)

According to her, 'Choli ke peeche kya hai' contributed to sexual harassment of women. Shankar Chugh, another member of the BJP, reiterated her views:

On the one hand number of steps have been taken for the welfare and security of women, on the other hand persons like Subhash Ghai have been giving song to the anti-social elements like *choli ke peeche kya hai* and it has become very difficult for girls and women to go out. In case the above song is going to continue, the next song would be: *kachi ke peeche* [behind the underwear] and *peti cot ke peeche* [behind the petticoat] etc. (S. Chugh 1993)

Vineet Kumar, who filed a case against *Khalnayak* at the Consumer Redressal Forum [10] in Faridabad, cited an "instance in Sambhal where a young man namely Raju, son of Shri Nazar resident of Miyan Sarai used to tease girls of respectable families by singing this unparliamentary song." Kumar argued that the song should be deleted from the film on the grounds that it was "against the culture, convention and moral of Indian society" (V. Kumar 1993).

14. Concurring with Vineet Kumar's sentiments, an affronted Ashok Kumar from the Integrity and Welfare Society wrote:

One doesn't understand what the director Subhash Ghai wants to say to a cultured nation like India by showing songs with double meaning. When one's sisters and daughters are around and songs like these are played, one feels ashamed and embarrassed, (A. Kumar 1993) [11]

Adding to the list of the song's detrimental effects, Mrs. Ram Gupta indignantly inquired what kind of culture and tradition children would learn from watching such a song (Gupta 1993). Shweta Sanjay also expressed her concern about the song's effects on "innocent minds":

The audio playing of the said song has been disturbing parents and innocent minds throughout the nation. The said audio song should have been banned immediately on its release. . . . I fail to understand as to how will parents feel while viewing the said film with their children and more so when they ask about the meaning of the said words. (Sanjay 1993)

15. The letters suggest that the opponents of the song were morally offended by the lyrics and distressed about their effects upon children, women, and Indian culture. How do these letters characterize the objects of their concerns? We are presented with children whose 'innocent minds' are susceptible to corruption, women who require protection from sexual harassment, and Indian culture which needs to be shielded from vulgarity and immorality. From what did women, children and Indian culture require protection? The answer: that which was corrupting, violent, and obscene; in short, sexuality. What emerge from these letters are ways of identifying sexuality, women, children and Indian culture. Furthermore, the letters align women, children and Indian culture, producing an opposing relation between sexuality and the vulnerable trio.
16. Were such views about the song and its effects challenged? If so, how? Among the proponents of the song were exhibitors from Rajasthan. They sent out letters which clearly drew upon a common text. In the letters, they urged the Board to retain 'Choli ke peeche kya hai' in the trailer of *Khalnayak* on the following grounds:

The above song is a very popular folk song of Rajasthan. It can be heard during Holi and other festivals in Rajasthan. We do not find anything vulgar in the above song. In fact we have seen many ladies singing the song. If the song was vulgar then the ladies would have never liked it. (Paras Cinema 1993)

I have seen the song on Zee TV and when I compared the words with the visuals I found nothing vulgar in it. The picturisation is also quite sober and we can enjoy with the family. We will request you to go through the song before giving us your decision and allow us to enjoy the beautiful song. (Rajesh Talkies 1993)[\[12\]](#)

17. If the opponents had argued that the song was against Indian tradition, its proponents cited its traditional pedigree, claiming it was a folk song which was sung at festivals. In fact, its supporters asserted the song could not be vulgar since women had been singing it. S. Nayyar, an interested citizen, supported their claim:

If the reason for this is the so-called vulgarity and suggestiveness of the lyrics then it seems only right to point out that this is not the only song by far to have such lyrics. And this is a folk song -- which means that it has been sung for decades and maybe centuries! While other songs which abound in double entendre and innuendo cannot even claim that distinction and have been written purely for the titillation of the masses. All these great moralists and puritans who have woken up so suddenly did not have much to say for the banning of other songs. My advice to them is to take the literal meaning of the song and forget about the so-called vulgarity. It's all minds anyway. (Nayyar 1993)

18. Arun Katiyar, in an article for *India Today*, confirmed that "folk traditions, especially in Punjab, Gujarat, Rajasthan and Uttar Pradesh have spawned wicked lyrics" (Katiyar 1994). However, he added that the songs are sung in *specific contexts* such as pre-wedding ceremonies. In these ceremonies, he explained that when "women sing what is commonly called ladies' *sangeet* [songs] in Punjab, it is done more in fun than as a come-on" (Katiyar 1994). I would like to draw your attention to how tradition, sexuality and women are intertwined in these discussions. The song's detractors claimed that it contributed to sexual harassment, constructing women as victims. Conversely, its proponents suggested that the song could not be vulgar since women had been seen singing it. Last, we have Arun Katiyar, who confirmed the song's traditional pedigree but contended that it had been dislodged from its context, in particular, pre-wedding ceremonies, which is to say the site of tradition. These positions seek to produce an 'Indian tradition'[13] in which women are either sexual victims or guardians of morality and tradition. However, they shirk from representing women as being sexually active.





19. The 'nearly complete' *Khalnayak* and its trailer appeared before the Examining Committee in Bombay during the course of Chugh's petition and the public debate. The trailer for *Khalnayak* was submitted for certification a few days before the film. Initially, the Examining Committee ordered that the words 'Choli ke peeche kya hai' be deleted from the trailer as they violated the censorship guidelines, specifically 2(vii). However, after examining the entire film, the committee passed the trailer without cuts because it was satisfied that the line did not violate state guidelines in the context of the totality of the song. This happy ending did not take place immediately. As in any good Bollywood film, certain obstacles needed to be overcome first.
20. After the committee members watched *Khalnayak*, they discussed their reactions to the film:

The members felt the theme of the film, the song sequences, and fights would be better understood by children with parental guidance. The members therefore unanimously felt the film should be granted a "UA" [Unrestricted public exhibition subject to parental guidance for children below the age of twelve] certificate with some cuts. The Examining Officer then informed the committee about the various letters received by CBFC [Central Board of Film Certification] for and against the film. The members after further discussion felt that the visuals in the song sequence were not vulgar, but the words 'Choli ke peeche kya hai' could be deleted. (India, Examining Committee, Report on *Khalnayak* 1993)

Public debate (in)formed the committee's decision to grant *Khalnayak* a "UA" certificate subject to seven cuts, three of which pertained to the *first picturization of the song*. The song appeared in the film twice but the Examining Committee, Chugh's petition, and the public debate focused on the first picturisation, one in which Madhuri Dixit (the heroine) and her entourage sing the song. [\[14\]](#) The committee recommended the following cuts in this song sequence:

<b>CutNo.</b>	<b>5</b>	<b>Reel</b>	<b>No.</b>	<b>6:</b>
Delete the words 'Choli Ke Peeche Kya Hai, Chunari ke Neeche Kya hai' [What is behind the blouse?, What is underneath the scarf ?] from the song sequence.				

<b>Cut</b>	<b>No.</b>	<b>6</b>	<b>Reel</b>	<b>No.</b>	<b>6:</b>
Delete the visuals of Ganga pointing at her breast in the song where she sings the song 'Jogan bana na jay kya karu' [I can't bear being an ascetic so what should I do].					

**Cut. No. 7 Reel no. 6:**

Delete the close visuals of pelvic jerks of dancing girls in the beginning of the song 'Choli ke peeche' 2(vii). (India, Examining Committee, Report on *Khalnayak* 1993)

The committee informed the applicant, Subhash Ghai, of its decision. He accepted most of the committee's recommendations but appealed against cuts five and seven. The committee reconsidered its decision and unanimously waived cut five but retained cut seven. Ghai agreed to this compromise. Although the film had been examined, the final editing for *Khalnayak* was still in progress. After its completion, Ghai sent the committee a series of additions and deletions which were certified.

21. We have before us two instances of cutting, namely editing and censoring. While the former is part of the 'creative' process, the latter is viewed as an imposition of state authority. I would like to suggest that both instances contribute to the production of meaning, in short, to how the film is understood in its total social moment. In addition, the process of censorship is not limited to cutting. The film is classified "UA" and given the appropriate certificate. What prompts this decision is the committee's uncertainty about whether children will be able to acquire a *proper* understanding of the film, specifically sequences containing sex and violence, without parental guidance. The classification serves as a signpost to parents, urging them to exert their authority and regulate how the film is understood. The mechanisms of cutting, certifying and classification contribute to regulating meaning.
22. In some part due to this controversy, 'Choli ke peeche kya hai' became a smash hit. In the eastern region alone, 'Choli ke peeche kya hai' sold over seven hundred thousand cassettes. According to market estimates, TIPS, the music company which released the audio cassette, invested Rs. 12.5 million, including publicity, in the *Khalnayak* soundtrack, and sold over 5 million tapes, making the company a profit of Rs. 30 million. The lucrative profits made by TIPS were most probably also shared with the producers of *Khalnayak* (Mannan 1993). Considering the profits at stake, an editorial in *The Sunday Times of India* suggested that the 'Choli ke peeche kya hai' controversy was a marketing strategy engineered by the showman Subhash Ghai (Chatterjee 1994, 13; Katiyar 1993).<sup>[15]</sup> The legal petition to censor the song and the ensuing debate contributed to constructing it as an object of controversy. When a controversial text enters the public domain, it becomes a marketable property due to its lure as a forbidden object. Its status as a forbidden object is constructed by the known act of censorship (Kuhn 96). Censorship in this case fueled desire. An effect

of this desire was an increase in profits for the film producer and the music industry.



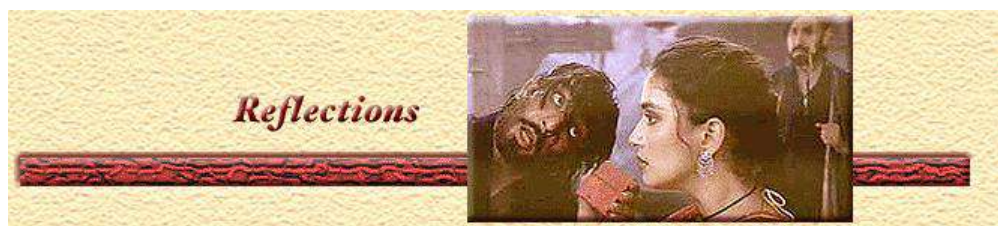
23. Let us consider the song which became the object of controversy. I will briefly summarize the events in the film which precede the song's first appearance. The villain Ballu (Sanjay Dutt)[\[16\]](#) kills a politician and is captured by the hero, intelligence officer Ram Sinha (Jackie Shroff). While Ram is visiting his girlfriend, sub-inspector Ganga (Madhuri Dixit), in Bollywood's version of an Indian village, Ballu escapes from prison and Ram is bombarded with accusations of incompetence.[\[17\]](#) In fact, one reporter suggests that Ram failed to fulfill his duty as an intelligence officer because he was having a 'good time' with Ganga. Ganga, then, becomes the temptress who leads Ram astray from his duty to the police force and causes his failure. In order to redeem himself in the eyes of the police force, he must regulate his desire for her. Consequently, Ram vows to remain unmarried until he recaptures Ballu. In order to salvage her fiancé's reputation -- and her own reputation since the townspeople have begun to wonder about Ganga's relations with Ram since he has not married her -- Ganga disguises herself as a 'folk' dancer; she sings the song 'Choli ke peeche kya hai' to seduce Ballu so that she can join his gang and eventually bring him to justice.
24. Ganga's guise as a dancer constructs the expression of her sexuality as a "masquerade." We as privileged spectators know that behind this guise is a 'pure' Ganga who loves Ram and who is enacting this role out of a sense of duty. At the beginning of the song sequence, which is composed of one hundred and fourteen shots, a veiled Ganga swaying to the sinuous rhythm of the flute enters the villain's den. Unlike the all-male audience who watch Ganga's entry, the spectators know that she is a representative of the police force and thus, of course, a danger to the criminal world. Interestingly, within the domain of criminals, Ganga is also constructed as the object of desire and as a lure which can destroy this world if she is not controlled.[\[18\]](#) As Ganga, dressed in an itchy-bitsy, red-sequined blouse glides across the floor, the camera salaciously focuses on different parts of her anatomy. In this case, the technology of the camera and the editing processes construct Ganga as a desirable object. They also position the male audience within the diegetic space as voyeurs and extend the same position to the spectators

in the theater. Although the technology of the camera and the editing processes construct Ganga as a sexual object, the privileged spectators, unlike the all-male audience in the diegetic space, know that she is a sub-inspector and therefore, a subject of the Law.

25. After marking Ganga's entry, the camera cuts to another dancer, Neena Gupta, as she demands "Choli ke peeche kya hai? Chunari ke neeche kya hai?" (What is behind the blouse? What is under the veil?). Employing a shot/reverse shot, the camera turns to Ganga, focusing on her blouse, as she slowly unveils and answers "Choli mein dil hai mera, chunari mein dil hai mera, yeh dil mein doongi mere yaar ko, mere pyar ko" (My heart is in my blouse, my heart is under veil, I'll give this heart to my lover). The camera lingers over Ganga's blouse and makes the *double entendre* visible. The reference is not only to Ganga's heart, but also to her breasts. The interaction between Ganga and her dancing partner which the camera captures is a highly sexualized performance. What I want to highlight is the performative aspect here and stress that the privileged audience, Ganga, and her dancing partner know that this exaggerated performance is taking place to capture the villain. After showing this interaction, the camera cuts and zooms on the smirking figure of Ballu, the villain who is simultaneously the desiring male subject and the criminal object under Ganga's surveillance. What Ballu does not realize and the privileged spectator does is that behind the blouse and behind the veil is a representative of the police force masquerading as an object of desire.
26. The song reappears in the film after intermission. Curiously, its second rendition did not attract public attention. By this time, both Ganga and the audience find out that Ballu discovered Ganga's true identity at their first meeting, soon after she finished singing the song. This discovery not only unveils Ganga's identity as a sub-inspector, but more importantly reveals that her display of sexuality was a masquerade and that behind this masquerade is a pure Ganga. When Ganga realizes that she is actually being held hostage, she wants to leave and protests against her imprisonment by not eating. Ballu and his gang sing the song to coax her to eat. In a sequence composed of twenty-eight shots, Ballu and his gang don appropriate dancing attire and attempt to entertain Ganga. Interestingly, the editing processes and camera angles do not sexualize the men's bodies as they imitate Ganga's performance. They fail miserably at being either sexy or alluring. In contrast to the depiction of Ballu and his gang as voyeurs during the first picturization of the song, the camera technology does not construct Ganga as a voyeur because she refuses to watch the men's performance. By the same token, the camera does not extend this position to the spectators in the audience. What is then behind the men's failure to perform as 'good' lures and Ganga's failure to act as a 'good' voyeur? Behind these

failures, I think, is a social convention, one that supports a patriarchal status quo. It is only women -- especially 'bad' women -- who can be 'good' lures; men are obviously the subjects of desire, not sexual objects.

27. Although the song appeared twice in the film and on the audio cassettes, it was its first rendition which became the focus of public controversy. Why didn't the song's second rendition attract the attention of the public or the censors? Was it the representation of sexy female bodies which made the song controversial? This answer doesn't seem satisfactory because camera shots focusing on female breasts litter Bollywood screens. Therefore, it is difficult to imagine why such a representation would incite debate. The controversy was not only about the representation of sexy female bodies, but also the refrain 'Choli ke peeche kya hai.' Did this refrain simply lose its 'oomph' when Ballu and his gang sang the song? Was the refrain inoffensive without the camera shot focusing on Ganga's blouse? Why were the words more obscene and vulgar when sung by female singers and female characters? I believe that the first rendition of the song was disruptive because the visual and verbal representation combined to produce female sexual desire. It was the articulation of this desire that was the problem -- it posited that women were not only sexual objects, but also sexual subjects.
28. This problem is resolved in the filmic narrative by Ganga's reinscription as a pure woman. In a shoot-out, Ganga protects Ballu from the police by inserting herself in between the two. While Ballu escapes again, Ganga is arrested for aiding a criminal. She is accused of consorting with a criminal and is placed on trial for betraying the police service. While the police charges Ganga with treason, newspapers accuse her of a greater crime, namely, being unfaithful to her lover, and only Ballu can save Ganga's tarnished reputation. The film ends with Ballu's dramatic entry into the courtroom. He declares that Ganga is 'pure': she has betrayed neither her lover nor the police service. In fact, he announces that it was her purity which compelled him to return and surrender. While the film's conclusion upholds purity as virtue, particularly for women, the abject figure of Ganga who sits in the trial box testifies to a silenced sexuality.



29. In Chugh's petition, the public argument, and the filmic narrative, the female body becomes the site and focus for the debate on the role of sex in Indian tradition. What complicates the debates on Indian tradition further is the specific function the film industry assumes in a growing capitalist market. Some members of the film and music industries claimed that 'Choli ke peeche kya hai' was a 'folk song' and hence, a part of Indian tradition. Within the capitalist market, such traditions are easily manufactured, packaged, publicized and sold. In *Khalnayak*, this film/'folk' song becomes a conduit for the commodified presentation of the female body. Bollywood's highly sexualized version of the 'village belle' is sold in theaters and video stores for huge profits. Thus, the film industry plays a crucial role in the commodification of female sexuality.
30. In this controversy, what needs to be problematized is both the repression of female sexuality and the commodification of female sexuality in the name of Indian tradition -- and what needs to be explored further is the possibility of women's sexual agency. It is a possibility illuminated by attending to a reading of the song by Madhuri's Dixit's fans, in particular the middle-class women in urban India who enjoyed 'Choli ke peeche kya hai.'[\[19\]](#) During the period when this film was released, Madhuri Dixit, who plays Ganga, became the highest paid film-actress to date in popular cinema. Among her many fans (including myself), Dixit was known for her stunning and sexy dance performances. It is not difficult to see why many middle-class women in urban India would enjoy these performances.[\[20\]](#) These women are often given gender training by families and by society at large on how to dress and how to speak. For the most part, they are warned that any public expression of sexuality on their part will lead to sexual violation. Whether women pay heed to these precautionary measures or not does not seem to matter since they are generally subjected to sexual harassment in any case. In an atmosphere where the consequences of any sexual expression are sexual violation or harassment, many of Dixit's middle-class female fans find her performances pleasurable because they associate sexual agency with these performances.[\[21\]](#)
31. Janice Radway's insights help us in interpreting these responses. By attending to viewers' responses in a context, we can see that "although ideology is extraordinarily pervasive and continually determines social life, it does not preclude the possibility . . . of limited resistance" (J. Radway 1984 p. 17). This resistance is carried out by viewers who "appropriate otherwise ideologically conservative forms in order to better their lives, which have been controlled and dictated by their place in the social structure" (J. Radway 1984 pp. 17-18). I think by reading films such as *Khalnayak* against the grain, we will not only

discover "a code of prohibition and denial' -- in the sense that cinema supplies what reality denies," but we "will also recognise the wounds that the 'code of prohibition and denial' have inflicted on desire itself -- wounds that are not external to but within the iconographic system . . . that expresses rather than represses" (Koch 1993 36).

32. I have sought to situate the story of censorship in a broader field, attending to other sites of power, namely, film production and reception. Such an analysis illuminates the complexity of the process of censorship. And, I believe that a fruitful political intervention in the field of censorship needs to take account of this complexity.

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## Notes

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1. The concept of tradition, its relation to modernity and its importance to nation-building have been well-documented by many scholars. My understanding of this concept has been influenced to by two works in particular, Partha Chatterjee's *The Nation and Its Fragments* and *Recasting Women*, edited by Kumkum Sangari and Sudesh Vaid. A central site for debates on 'tradition' between the British and its nineteenth century colonies was the body of the colonized woman. The colonizers declared that the 'natives' were barbaric because their traditional laws were uncivilized: these laws oppressed the 'Indian' woman. In response to this charge, the reformers attempted to remedy what the British had deemed uncivilized - *sati* (widow immolation), child marriage, polygamy, dowry, the status widows, *purdah* (veil), lack of women's education. In either case, women were viewed as the passive objects of reform.
2. The rise of the film song in the 1930s in India coincided with the advent of the Talkies. The film industry realized it had access to technology which would allow it to reproduce songs; thus, it would have access to larger markets and greater profits. Therefore, classical songs such as *ghazals* were restructured to match the new medium. At classical music gatherings, the musician could change and was encouraged to change the tempo of the music depending upon the context. However,

the medium of the film demanded uniformity, reproducibility, and repeatability to sell this product at a centralized scale. Rapidly, due to its wide reach through the medium of radio and record players, film songs displaced both classical and folk music in popular culture. Thus, the film song is linked to the project of building a modern nation-state. As the 'traditional' folk song is linked to the 'community,' the modern form of popular Indian culture, the film song, is associated with the nation.

3. Shakti Samanta, the Chair of the Film Certification Board, was forwarded Gautam Kaul's remarks and suggestions, but refused to consider them, citing the Board's functions as outlined in the *Cinematograph Act of 1952*, in support of his action. In his response, he stressed that the Board's sole task was to review films for the purpose of certification for public exhibition; it was not asked to attend to film financing or audio certification.
4. This piece of information becomes significant in the light of the letters received by various Bhartiya Janata Party (BJP) wings in support of Chugh's petition.
5. This instance also reveals the distribution of power which is constitutive of the state. The 'state' is not a coherent body but an effect of a series of practices. Throughout this article, my understanding of censorship is informed by the work of Annette Kuhn.
6. This controversy was subsequently taken up by politicians and led to a stricter approach by the Central Board of Film Certification. See Usha Rai, "Censor Board for ending denigration of ministers, officials in films," *Indian Express* 3 July 1994.
7. I have selected a few of the letters for the purpose of my analysis.
8. The committees certify films as well as their trailers. With the advent of satellite television, the trailers did not require certification from the state for exhibition on private channels. They did, however, require the certification for exhibition in theatres and on state-television.
9. Eve-teasing refers to the sexual harassment of women.
10. The legal procedure under which the case could be filed was the Consumer Protection Act.
11. My translation.
12. Letter from Rajesh Talkies in Ramganj District in Rajasthan, 10 May 1993.
13. Letter from the Director of Nirman Theatre to Shakti Samanta, 7 May 1993. While theatre owners in Rajasthan and S. Nayyar pointed to a history of folk traditions in defense of the song, the director of Nirman Theatre in Chandigarh referred to another tradition, namely, the history of Indian cinema. He inquired why the censors and the public were agitated about 'Choli ke peeche kya hai', considering that songs such as 'Tk chumma de de' (Give me a kiss); 'Teri choli mein silwate kaise



padhe' (What makes your blouse stretch/wrinkled?); 'Jumma-chumma de de' (Give me a kiss on Friday); 'Raat bhar mua sone na de sooi lagawe ghari, ghari' (All night a needle kept piercing me and didn't allow me to sleep); 'Hum to tumbu mein lumbo lagaye batahe' (I sit in the tent, holding it up with my length); 'Chamdhe ki jopari mein aag lagi hai' (My skin is on fire); and 'Lenahailenahailenahai' (I want to get it, I want to get it, I want to get it ) had been passed without evoking any censure or anxiety.

14. I speculate on the reasons for this focus later in the paper.
  15. Following the fiscal success of 'Choli ke peeche kya hai,' a series of similar songs were reproduced to cash in on the current fad. According to one estimate, songs with the word 'choli' in them or those boasting *Khalnayak's* rustic melody could have collectively sold about 14.5 lakh tapes. Sawan Kumar's *Khal-naaikaa/The Villainess*, Mohan Prasad's *Dosti ki Saugandh/Upon the Honor of Friendship*, Ajay Kashyap's *Pathrila Rasta/A Rocky Path* feature a 'choli' song.
  16. Sanjay Dutt, who played the absconding criminal Ballu, added a real-life twist to his on-screen role. He was arrested in connection with the March 1993 bombings in Bombay which had fueled communal tensions between Hindus and Muslims.
  17. Hindi commercial cinema frequently uses names of religious and mythical figures as signposts for its audience. The names of the characters Ram, Ballu (an abbreviation of Balram) and Ganga refer to *Ramayana's* dutiful Ram, to Balram who is easily angered, and to the goddess/river Ganga, respectively. The river Ganga is supposed to be pure and wash away sins of those who take a dip in it. The real river in this case is quite polluted.
  18. During the course of the song, Ballu's gang members look at Ballu uneasily, afraid that he may be too enamored by the folk dancer and that this desire for her may bring harm to the gang.
  19. I am not saying that all middle-class women liked the song; in fact, many did not for the same reasons asserted by Chugh and others, namely, that the song was vulgar and obscene.
  20. I am focusing on middle-class women and urban India simply because of my familiarity with both.
  21. I am drawing on the film entitled *Memories of Fear* and the discussion which took place after this film's screening at the Film Appreciation Course at the National Film Archives that I attended in June 1996. Also see Jyoti Puri, *Women, Body, Desire in Postcolonial India: Narratives of Gender and Sexuality* (New York: Routledge, 1999).
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