



JUDICIAL ACTIVISM IN INDIA: DRIVING SOCIAL CHANGE THROUGH ENVIRONMENTAL PROTECTION

Devang Sanjaykumar Brahmhatt¹, Dr RekhaKumari Singh²

¹ Research Scholar, Faculty of Law, S.P. University, Vallabh Vidyanagar, Anand

² I/c. Principal, Anand College of Legal Studies, Dean of Law Department of Sardar Patel University, Vallabh Vidyanagar, Anand

ABSTRACT

The Indian judicial system has played a pivotal role in fostering social transformation through the protection and enforcement of environmental rights. By interpreting constitutional provisions—especially Article 21, which guarantees the right to life—to include the right to a clean and healthy environment, the judiciary has significantly influenced environmental governance in India. Through landmark judgments, the development of Public Interest Litigation (PIL), and the establishment of the National Green Tribunal (NGT), the judiciary has expanded access to environmental justice and promoted principles such as sustainable development, the polluter pays principle, and intergenerational equity. Despite facing challenges like delayed enforcement, lack of scientific expertise, and jurisdictional overlaps, the judiciary continues to act as a guardian of environmental rights and a catalyst for ecological consciousness in the country. This paper critically examines the constitutional provisions, landmark cases, institutional mechanisms, and challenges associated with the judiciary's role in environmental protection, highlighting its transformative impact on India's legal and social landscape.

KEYWORDS: Judiciary, Environmental Protection, Social Transformation, Constitutional Provisions, Article 21, Public Interest Litigation (PIL), Sustainable Development, Polluter Pays Principle

1. INTRODUCTION

The judicial system in India has historically played a critical role not only in the interpretation and enforcement of laws but also as a dynamic instrument of social transformation. In a nation as diverse and evolving as India, the judiciary has emerged as a strong pillar of democracy, ensuring that constitutional ideals such as justice, equality, liberty, and dignity are upheld in practice. Among the myriad areas in which the judiciary has made a significant impact, the domain of environmental protection stands out as a remarkable example of judicial activism and public-spirited adjudication. The courts in India have increasingly taken on a proactive role, often stepping in where executive and legislative mechanisms have faltered, to safeguard the natural environment and ensure sustainable development.

In the post-independence era, the scope of social justice has expanded considerably, and the courts have interpreted the Constitution not merely as a legal document, but as a living charter aimed at fostering social change. This expansion has brought within its fold the concept of environmental justice—anchored primarily in Article 21 of the Constitution, which guarantees the right to life. Through landmark judgments and progressive interpretations, the Indian judiciary has held that the right to life includes the right to a wholesome, clean, and healthy environment. Consequently, environmental protection is no longer seen as a peripheral issue but as a core element of human rights and social well-being.

The rise of Public Interest Litigation (PIL) in the late 1970s and 1980s marked a turning point in the Indian legal landscape.

It enabled socially conscious individuals and organizations to seek legal remedies for environmental degradation, often affecting large sections of the population, especially the underprivileged. The judiciary responded with vigor, laying down essential doctrines such as the “Polluter Pays Principle,” the “Precautionary Principle,” and the “Public Trust Doctrine.” These judicial innovations have contributed significantly to the development of environmental jurisprudence in India and have inspired legislative and policy changes at both central and state levels.

Environmental issues, ranging from air and water pollution to deforestation, industrial hazards, and climate change, have far-reaching consequences on public health, livelihood, and the ecological balance of the country. In this context, the judiciary's intervention has not only led to the enforcement of existing laws but also filled the legislative and administrative voids by guiding public policy in the direction of sustainable development. The Indian courts, particularly the Supreme Court and High Courts, have frequently taken suo motu cognizance of environmental matters and delivered judgments that reflect a deep concern for ecological preservation and inter-generational equity.

In recent years, the establishment of the National Green Tribunal (NGT)¹ has further institutionalized the legal framework for environmental protection in India. Although a quasi-judicial body, the NGT functions within the judicial domain and complements the efforts of the traditional courts in ensuring effective and speedy resolution of environmental disputes. The cumulative efforts of the judiciary, from expanding the

scope of fundamental rights to enforcing environmental norms, underline its transformative potential in shaping a just and environmentally conscious society.

Thus, the Indian judicial system, through its commitment to constitutional values and its assertive role in environmental governance, continues to contribute profoundly to the larger agenda of social transformation. Its influence in balancing ecological concerns with developmental imperatives underscores the indispensable role of the judiciary in steering the nation towards a future where economic progress does not come at the cost of environmental sustainability.

2. EVOLUTION OF ENVIRONMENTAL JURISPRUDENCE IN INDIA

The evolution of environmental jurisprudence in India is a compelling narrative of how legal and judicial mechanisms have responded to the growing need for environmental protection in the face of rapid industrialization, urbanization, and ecological degradation. It reflects the journey from a period of minimal legal recognition of environmental concerns to a robust judicial framework that integrates environmental rights with constitutional guarantees and sustainable development principles.²

1. Pre-Constitutional and Early Legislative Phase (Before 1950s)

In the colonial era, environmental regulation was largely utilitarian and designed to serve administrative convenience rather than ecological protection. Laws such as the **Indian Forest Act, 1927**, and the **Factories Act, 1948**, were enacted with limited environmental objectives. These early statutes focused on forest control, industrial regulation, and sanitation, without a holistic environmental approach.

2. Constitutional Recognition and the Directive Phase (1950–1970)

After independence, the Indian Constitution (1950) did not originally contain explicit provisions for environmental protection. However, the framework began to evolve with the introduction of the **42nd Constitutional Amendment in 1976**, which added:

- **Article 48A:** Mandating the State to protect and improve the environment and safeguard forests and wildlife.
- **Article 51A(g):** Making it a Fundamental Duty of citizens to protect and improve the natural environment.

This marked the beginning of constitutional environmentalism, though actual jurisprudence had yet to take form.

3. The Statutory and Institutional Development Phase (1970s–1980s)

India's international commitment at the **1972 United Nations Conference on the Human Environment (Stockholm Conference)** acted as a turning point. Several key environmental laws were enacted during this period:

- **The Water (Prevention and Control of Pollution) Act,**

1974³

- **The Air (Prevention and Control of Pollution) Act, 1981⁴**
- **The Environment (Protection) Act, 1986⁵**, enacted after the Bhopal Gas Tragedy, became the umbrella legislation for environmental protection in India.

These laws laid down mechanisms for pollution control boards, regulatory powers, and penalties, but judicial interpretation was still limited.

4. Rise of Judicial Activism and PIL Era (1980s–1990s)

The Indian judiciary, particularly the **Supreme Court**, began to actively engage in environmental matters during the 1980s. This era witnessed the **emergence of Public Interest Litigation (PIL)** as a powerful tool for environmental justice. Courts began interpreting **Article 21 (Right to Life)** to include the right to a clean and healthy environment.

Landmark cases:

- **M.C. Mehta v. Union of India⁶:** A series of cases dealing with issues like pollution of the Ganga, vehicular emissions in Delhi, and the Oleum gas leak laid the foundation of modern environmental jurisprudence.
- The courts evolved doctrines like:
 - **Polluter Pays Principle**
 - **Precautionary Principle**
 - **Public Trust Doctrine**
 - **Sustainable Development**

5. Doctrinal Maturity and Expansion (2000s onwards)

The jurisprudence matured with consistent application of environmental principles, stricter enforcement, and increased recognition of ecological balance as integral to human rights. Courts intervened in issues of deforestation, mining, industrial pollution, and urban planning.

- In **T.N. Godavarman Thirumulpad v. Union of India⁷**, the Supreme Court virtually monitored forest conservation policy for over a decade.
- The **Narmada Bachao Andolan case and Sterlite Industries case⁸** reflected how the judiciary attempted to balance development with ecological sustainability.

6. Institutionalization through National Green Tribunal (NGT) (2010–Present)

The **National Green Tribunal Act, 2010⁹**, established the NGT as a specialized environmental court with powers to adjudicate matters related to environment protection and conservation. The NGT has brought expertise, speed, and consistency in environmental adjudication and has become central to India's environmental legal framework.

7. Recent Trends and Contemporary Challenges

Increasing use of **environmental impact assessments (EIAs)** and scrutiny of large-scale infrastructure projects.

- Greater emphasis on **climate change, biodiversity, and environmental justice for marginalized communities**.
- Challenges include **delays in enforcement, resistance from administrative agencies, and the dilution**

of environmental norms in the name of economic development.

The evolution of environmental jurisprudence in India demonstrates a vibrant and responsive legal system that has gradually transformed environmental protection into a constitutionally guaranteed right. From passive legislative frameworks to proactive judicial interventions, the journey reflects how the Indian judiciary has become an architect of ecological justice and social transformation. With the growing environmental crises, the path ahead requires stronger legal enforcement, more community participation, and unwavering judicial commitment to the ideals of sustainability and intergenerational equity.

3. CONSTITUTIONAL PROVISIONS AND ENVIRONMENTAL PROTECTION

The Indian Constitution, though not originally explicit about environmental protection at the time of its adoption in 1950, has gradually evolved to incorporate a robust framework for safeguarding the environment through judicial interpretation, legislative amendments, and the growing global concern for sustainable development. The Constitution now plays a central role in establishing the legal and moral foundation for environmental governance in India.

A major milestone in the constitutional journey of environmental protection came with the 42nd Amendment Act of 1976, which introduced two significant provisions. First, it added Article 48A under the Directive Principles of State Policy, which states that “The State shall endeavour to protect and improve the environment and to safeguard the forests and wildlife of the country.” This provision places a duty on the state to make efforts toward environmental conservation. Although not enforceable by courts, Article 48A reflects the intent and obligation of the government to prioritize environmental well-being as part of its policy-making framework.

Simultaneously, the same amendment added Article 51A(g) under the Fundamental Duties of citizens, which says: “It shall be the duty of every citizen of India to protect and improve the natural environment including forests, lakes, rivers and wildlife, and to have compassion for living creatures.” This provision imbues every citizen with a moral and civic responsibility to contribute to environmental protection, thus reflecting the participatory nature of environmental stewardship in a democratic society.

The most dynamic and far-reaching interpretation of environmental rights has emerged from Article 21 of the Constitution, which guarantees the right to life and personal liberty. Over the years, the Supreme Court of India has interpreted Article 21 to include the right to a clean, healthy, and pollution-free environment as an essential part of the fundamental right to life. Landmark judgments such as *Subhash Kumar v. State of Bihar* and *M.C. Mehta v. Union of India* have firmly established that environmental degradation violates the right to life under Article 21, thereby elevating environmental protection to the status of a fundamental right.

In addition, the Indian judiciary has drawn upon other constitutional provisions such as Article 14, which guarantees equality before the law, and Article 19, which guarantees the freedom to practice any profession or to carry on any occupation or trade, to balance economic development with ecological preservation. For instance, if an industrial activity causes harm to the environment and violates the rights of local residents, it can be challenged on the grounds of violating Article 14 due to unequal treatment or Article 21 due to the impact on quality of life.

Furthermore, Schedule VII of the Constitution, which delineates the distribution of powers between the Union and the States, includes environmental matters under the Concurrent List, allowing both levels of government to enact laws related to forests, wildlife protection, and pollution control. This facilitates a cooperative federal approach to environmental governance, though it also occasionally leads to jurisdictional conflicts.

In sum, the Indian Constitution, through a combination of explicit provisions, directive principles, fundamental duties, and expansive judicial interpretation, provides a comprehensive constitutional mandate for environmental protection. It not only obligates the State to act but also empowers the citizens and the judiciary to participate actively in preserving ecological balance. The constitutional framework thus serves as the backbone for India's environmental laws, policies, and jurisprudence, aligning national goals with the global imperative for sustainable development.

4. JUDICIAL ACTIVISM AND SOCIAL TRANSFORMATION

Judicial activism in India has been a powerful instrument of social transformation, especially in circumstances where the executive and legislature have failed to address urgent public concerns. It refers to the proactive role played by the judiciary in upholding constitutional values and ensuring justice by interpreting laws expansively, often stepping into policy domains to safeguard rights and enforce duties. Over the decades, Indian courts—particularly the Supreme Court—have emerged not only as arbiters of disputes but also as agents of socio-legal change, deeply influencing public policy and reforming institutional governance.

The roots of judicial activism in India lie in the post-Emergency era of the late 1970s and 1980s, when the judiciary began adopting a broader and more inclusive approach to justice. One of the landmark innovations was the introduction of Public Interest Litigation (PIL), which allowed individuals and civil society organizations to approach the court on behalf of disadvantaged or marginalized groups. This significantly widened access to justice and enabled the judiciary to take up issues such as bonded labour, prison conditions, child labour, pollution, and the rights of slum dwellers, thus making the courts more accessible to the poor and voiceless sections of society.

Judicial activism has played a crucial role in redefining and expanding the scope of fundamental rights, especially Article 21 of the Constitution, which guarantees the right to life and personal liberty. The courts have interpreted the right to life to include a wide array of entitlements—such as the right to live with dignity, the right to education, the right to health, the right to shelter, and the right to a clean environment. Through such progressive interpretations, the judiciary has transformed abstract constitutional ideals into enforceable rights, contributing significantly to India's social development.

One of the most impactful areas of judicial activism has been environmental protection, where the courts have stepped in to safeguard public health, natural resources, and ecological balance. In the absence of effective executive action, the judiciary has invoked constitutional provisions and international environmental principles to halt harmful industrial practices, preserve forests, regulate pollution, and enforce environmental standards. Landmark cases like *M.C. Mehta v. Union of India* have not only addressed specific environmental grievances but have also laid the foundation for a more sustainable and rights-based model of development.

Judicial activism has also influenced governance reforms and institutional accountability. Through suo motu actions and PILs, the judiciary has compelled governments to implement welfare schemes, improve transparency, and uphold the rule of law. In cases involving corruption, custodial deaths, sexual harassment, and electoral disqualifications, the courts have often acted as a check on executive overreach and legislative inaction. Such interventions, while sometimes controversial, have helped reinforce democratic norms and civic engagement.

However, judicial activism is not without criticism. Concerns have been raised about judicial overreach, where courts are seen to encroach upon the functions of the legislature and executive. Critics argue that this may disturb the delicate balance of power among the three organs of government and undermine the principle of separation of powers. Despite these concerns, judicial activism has largely functioned as a corrective mechanism—stepping in where governance has failed and championing the causes of justice, equity, and human dignity.

Overall, judicial activism in India has played a transformative role in shaping a more just and inclusive society. By interpreting constitutional provisions dynamically and responding to the needs of the marginalized, the judiciary has strengthened democratic values, promoted human rights, and advanced social welfare. As India continues to grapple with complex social and environmental challenges, the role of an engaged and responsive judiciary remains vital in steering the nation toward a more equitable and sustainable future.

5. LANDMARK JUDGMENTS IN ENVIRONMENTAL PROTECTION

Over the years, the Indian judiciary—particularly the Supreme Court—has delivered several landmark judgments that have shaped the country's environmental jurisprudence and

strengthened the legal framework for ecological preservation. These rulings have not only enforced existing environmental laws but also expanded the scope of the constitutional right to life under Article 21 to include the right to a clean and healthy environment. Through these judgments, the courts have emphasized principles such as sustainable development, polluter pays, and intergenerational equity.

One of the most celebrated cases in Indian environmental law is *M.C. Mehta v. Union of India* (1986), also known as the *Oleum Gas Leak Case*. Following a hazardous gas leak from a fertilizer plant in Delhi, the Supreme Court held that industries engaged in hazardous activities owe an absolute duty to the community to ensure that no harm is caused. The court introduced the “principle of absolute liability,” which went beyond the English concept of strict liability, making it clear that companies cannot escape liability even if they followed safety precautions. This case marked a turning point in the court's approach to environmental protection and corporate responsibility.

In *M.C. Mehta v. Union of India* (Ganga Pollution Case), the Supreme Court dealt with the alarming pollution of the Ganges River by industries located along its banks. The court directed the closure or relocation of tanneries and industries that failed to install effluent treatment plants. This case highlighted the judiciary's willingness to enforce compliance with environmental laws and regulations, even if it meant economic disruptions in the short term.

Another landmark case was *Vellore Citizens' Welfare Forum v. Union of India* (1996)¹⁰, where the Supreme Court emphasized the “Precautionary Principle” and the “Polluter Pays Principle.” The court held that the state must anticipate, prevent, and attack the causes of environmental degradation and that the polluting industries were liable to pay for the restoration of the environment. This judgment brought international environmental principles into Indian law and has since been cited in numerous environmental cases.

In *Indian Council for Enviro-Legal Action v. Union of India* (1996)¹¹, the court dealt with chemical industries in Rajasthan that were causing soil and water pollution. It reinforced the “polluter pays” principle and ordered the industries to pay compensation for the environmental damage caused. The ruling also addressed the problem of delayed enforcement by state agencies and emphasized the need for prompt and effective implementation of environmental laws.

The *T.N. Godavarman Thirumulpad v. Union of India* series of cases, starting in 1995, are significant in the context of forest conservation. The Supreme Court, through a continuing mandamus, expanded the definition of “forest” and brought all types of forest lands under legal protection, regardless of ownership. The court also placed a nationwide ban on tree felling in forests and set up the Central Empowered Committee (CEC) to oversee forest-related matters. These judgments have had a far-reaching impact on forest governance and conservation practices in India.

In *Subhash Kumar v. State of Bihar* (1991), the court explicitly ruled that the right to life includes the right to enjoy pollution-free water and air. This case reinforced the environmental dimension of Article 21 and provided a legal basis for individuals to approach the courts when their environmental rights are threatened.

The *GODAVARMAN*¹² and *Aravalli Hills Cases* (involving states like Haryana and Delhi) also stand out for emphasizing the protection of ecologically sensitive areas from illegal mining and construction activities. The judiciary, through these cases, not only restricted harmful development but also promoted the need for ecological restoration and sustainable land use.

In recent years, the *Lafarge Umiam Mining case* (2011)¹³ examined the environmental clearance for limestone mining in Meghalaya. The Supreme Court emphasized the principle of sustainable development and held that environmental concerns must be balanced with developmental needs. It directed that a proper environmental impact assessment (EIA) and public consultation were essential before allowing such projects.

These landmark judgments reflect the proactive role played by the Indian judiciary in developing environmental jurisprudence, enforcing constitutional and statutory obligations, and promoting environmental justice. By invoking fundamental rights, public interest, and international principles, the courts have elevated environmental protection to a central theme of governance and policy-making in India.

6. CHALLENGES FACED BY JUDICIARY IN ENVIRONMENTAL GOVERNANCE

Despite its commendable role in strengthening environmental protection in India, the judiciary faces several challenges in effectively governing environmental matters. These challenges stem from institutional limitations, procedural delays, and structural inadequacies that restrict the judiciary's ability to deliver prompt and impactful environmental justice.

One of the foremost challenges is the lack of scientific and technical expertise within the judiciary. Environmental issues often involve complex scientific data, technical assessments, and ecological modelling. While the National Green Tribunal (NGT) was established to address this gap by including experts alongside judicial members, other courts, particularly the High Courts and subordinate courts, still lack the specialized knowledge required to make informed decisions in environmental disputes. This sometimes leads to judgments that are legally sound but scientifically flawed or unenforceable in practical terms.

Another significant hurdle is the limited enforcement of judicial orders. Even when courts pass robust and progressive rulings to protect the environment, their implementation often depends on the executive machinery, which may be inefficient, politically influenced, or under-resourced. Environmental orders frequently remain on paper due to the absence of follow-up mechanisms and the lack of accountability of implementing agencies. This implementation gap weakens the authority of the

judiciary and reduces public trust in environmental litigation.

Delay in case disposal is another pressing issue. Although the NGT was designed to ensure quick redressal—within six months of filing—the reality is that a growing number of cases face procedural delays. The overall backlog in the Indian judicial system affects the timely resolution of environmental matters as well. Environmental harm, unlike other forms of injustice, often becomes irreversible with time; hence, delayed justice can result in permanent ecological damage and loss of biodiversity.

The judiciary also encounters limitations in suo motu jurisdiction, especially in environmental matters. While the Supreme Court and High Courts occasionally take suo motu cognizance of environmental violations, the NGT, as per its statutory mandate, cannot act without a petition or application. This reactive approach hampers the ability of courts to address emerging or unreported environmental issues proactively, despite clear ecological deterioration in many areas.

Another challenge lies in balancing environmental protection with developmental needs. India, as a developing country, must accommodate infrastructure expansion, industrial growth, and urbanization. Courts often find themselves in a dilemma where halting a polluting industry may protect the environment but lead to job losses and economic disruption. Striking a balance between ecology and economy requires nuanced, long-term vision—something the judiciary alone cannot achieve without complementary policy support from the legislature and executive.

Moreover, there is a lack of uniformity in judicial decisions across different forums. In some cases, the NGT and High Courts may offer conflicting rulings on similar environmental issues, leading to confusion and weakening the clarity of environmental jurisprudence. The absence of a centralized body to harmonize environmental interpretations creates legal uncertainty and affects policy coherence.

Environmental justice in India is also hindered by limited access for marginalized communities. Despite the advent of Public Interest Litigation (PIL), many affected people—especially from rural, tribal, or economically weaker sections—lack the awareness, legal literacy, or financial capacity to approach courts. This means that several instances of ecological degradation go unchallenged simply because those most affected cannot access legal remedies.

Overall, while the Indian judiciary has played a pivotal role in environmental governance, its effectiveness is constrained by a variety of systemic and structural issues. Addressing these challenges requires multi-institutional collaboration, greater investment in environmental capacity-building within the judiciary, and stronger coordination between the courts, regulatory bodies, and civil society. Only then can the judiciary sustain its role as a vital guardian of environmental rights and ensure justice in both legal and ecological terms.

7. CONCLUSION

The Indian judicial system has emerged as a powerful and proactive agent of social transformation, particularly in the realm of environmental protection. Through its expansive interpretations of constitutional provisions, especially Article 21—the right to life—the judiciary has elevated the right to a clean and healthy environment to the status of a fundamental right. This has empowered citizens, civil society, and legal institutions to actively participate in ecological governance and environmental justice.

Landmark judgments by the Supreme Court and High Courts, and the establishment of the National Green Tribunal (NGT), have significantly enriched India's environmental jurisprudence. The judiciary has applied globally recognized principles such as the Polluter Pays Principle, the Precautionary Principle, and Sustainable Development, thereby aligning Indian law with international environmental norms. These interventions have not only checked environmental degradation but also influenced policy-making and held industries and governments accountable for ecological violations.

However, the judiciary's role is not without challenges. Issues such as delayed case disposal, lack of technical expertise, weak enforcement mechanisms, and tensions between environmental and developmental imperatives often limit the effectiveness of judicial interventions. Moreover, the structural constraints of the legal system and insufficient access to justice for marginalized communities continue to be areas of concern.

Despite these challenges, the judiciary remains a beacon of hope in India's environmental landscape. It has filled critical governance gaps and promoted environmental consciousness across society. Moving forward, a more integrated approach involving judicial, executive, legislative, and community collaboration is essential for ensuring long-term ecological sustainability. Strengthening institutional capacities, enhancing legal literacy, and improving the implementation of environmental laws will be crucial in enabling the judiciary to fulfil its constitutional mandate. In doing so, the judicial system will continue to play a transformative role in shaping an environmentally just and socially equitable India.

FOOTER NOTES

1. Gill, G. (2016). *Environmental Justice in India: The National Green Tribunal*. Routledge.
2. Kumar, K. (2023). Evolution of Environmental Jurisprudence in India. Issue 2 Int'l JL Mgmt. & Human., 6, 2729.
3. Jain, S. N. (1984). *Water (Prevention and Control of Pollution) Act 1974: Basic Legal Issues*.
4. Srimannarayana, G., Lakshmi, V. V., Dondapati, A. S., Ratnakar, T., Dhanunjay, P., & Satyanarayana, P. (2023). "Legal Blueprint For Clean Air: The Air (Prevention And Control Of Pollution) Act, 1981 In India". *Journal of Namibian Studies*, 33.
5. Prasad, P. M. (2006). Environment protection: role of regulatory system in India. *Economic and Political Weekly*, 1278-1288.
6. Mohanavel, D. (2024). The Evolution of Environmental Law: A Critical Examination of MC Mehta v. Union of India and Its Impact. Issue 5 Int'l JL Mgmt. & Human., 7, 1922.
7. Chowdhury, N. (2014). From judicial activism to adventurism—the Godavarman case in the supreme court of India. *Asia Pacific*

Journal of Environmental Law, 17, 177-189.

8. Dwivedi, R. (1997). People's movements in environmental politics: a critical analysis of the Narmada Bachao Andolan in India. *ISS Working Paper Series/General Series*, 242, 1-49.
9. Shrotria, S. (2015). Environmental justice: is the National Green Tribunal of India effective?. *Environmental Law Review*, 17(3), 169-188.
10. Geeganage, K. H. (2022). Vellore Citizens' Welfare Forum and State of Tamil Nadu v Union of India and Others. *S. Asian J. Env't L. & Pol'y*, 1, 127.
11. Bhadouriya, K. S. (2022). Indian Council for Enviro-Legal Action v. Union of India, AIR 1996, 3 SCC 212. Issue 4 Indian JL & Legal Rsch., 4, 1.
12. Menon, A. (2014). The Godavarman judgment: Erasing the plurality of land use in Gudalur, Nilgiris 1. In *Conflict, Negotiations and Natural Resource Management* (pp. 33-50). Routledge.
13. Prakash, A., Kumar, A., & Singh, K. B. (2015). Pot-Hole Subsidence Potentiality in Nongtra Limestone Mine of Lafarge Umium Mining Private Limited, Shillong, Meghalaya. *International Journal of Mining Science*, 1(1), 10-16.

REFERENCES

1. Bhadouriya, K. S. (2022). Indian Council for Enviro-Legal Action v. Union of India, AIR 1996, 3 SCC 212. Issue 4 Indian JL & Legal Rsch., 4, 1.
2. Chowdhury, N. (2014). From judicial activism to adventurism—the Godavarman case in the supreme court of India. *Asia Pacific Journal of Environmental Law*, 17, 177-189.
3. Dwivedi, R. (1997). People's movements in environmental politics: a critical analysis of the Narmada Bachao Andolan in India. *ISS Working Paper Series/General Series*, 242, 1-49.
4. Geeganage, K. H. (2022). Vellore Citizens' Welfare Forum and State of Tamil Nadu v Union of India and Others. *S. Asian J. Env't L. & Pol'y*, 1, 127.
5. Gill, G. (2016). *Environmental Justice in India: The National Green Tribunal*. Routledge.
6. Jain, S. N. (1984). *Water (Prevention and Control of Pollution) Act 1974: Basic Legal Issues*.
7. Kumar, K. (2023). Evolution of Environmental Jurisprudence in India. Issue 2 Int'l JL Mgmt. & Human., 6, 2729.
8. Menon, A. (2014). The Godavarman judgment: Erasing the plurality of land use in Gudalur, Nilgiris 1. In *Conflict, Negotiations and Natural Resource Management* (pp. 33-50). Routledge.
9. Mohanavel, D. (2024). The Evolution of Environmental Law: A Critical Examination of MC Mehta v. Union of India and Its Impact. Issue 5 Int'l JL Mgmt. & Human., 7, 1922.
10. Prakash, A., Kumar, A., & Singh, K. B. (2015). Pot-Hole Subsidence Potentiality in Nongtra Limestone Mine of Lafarge Umium Mining Private Limited, Shillong, Meghalaya. *International Journal of Mining Science*, 1(1), 10-16.
11. Prasad, P. M. (2006). Environment protection: role of regulatory system in India. *Economic and Political Weekly*, 1278-1288.
12. Shrotria, S. (2015). Environmental justice: is the National Green Tribunal of India effective?. *Environmental Law Review*, 17(3), 169-188.
13. Srimannarayana, G., Lakshmi, V. V., Dondapati, A. S., Ratnakar, T., Dhanunjay, P., & Satyanarayana, P. (2023). "Legal Blueprint For Clean Air: The Air (Prevention And Control Of Pollution) Act, 1981 In India". *Journal of Namibian Studies*, 33.