

# JUDICIAL APPROACH TOWARDS GREEN COLLAR CRIMES IN INDIA IN LIGHT OF ENVIRONMENTAL JURISPRUDENCE

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*Environment is no one's property to destroy; it's everyone's responsibility to protect.*

*-Mohith Agadi<sup>1</sup>*

## ABSTRACT

Environmental crime is now becoming a serious problem worldwide in different forms, with some of them being among the most profitable criminal activities in the world. The most common crimes against the environment are connected with the unlawful exploitation of wild fauna and flora, pollution, waste disposal and its trade. Environmental jurisprudence regulates the environmental protection bodies and makes them effective. The article intends to examine the approach of judiciary towards the Environmental crimes in the light of the environmental jurisprudence in India. The superior judicial bodies including National Green Tribunal have set certain norms to deal with pattern of delivery of environmental justice. The principles governing the Indian judiciary are analyzed in the light of constitutional goals that govern the sphere of environmental jurisprudence.

**Keywords:** Environment Jurisprudence Collar Crimes Judicial Approach

## INTRODUCTION

The graph of Environmental crime is escalating with the development and endangering the entire ecosystems including flora, fauna, wildlife, human health, sustainable livelihoods and even the revenue streams to governments. In India, the concept of Environment Preservation is as old as the nation itself.<sup>ii</sup> Green-collar crimes are interchangeably used with environmental crimes. Environmental crimes are the ones that violate Environmental laws meant for protection of environment and human health from environmental pollution hazards.<sup>iii</sup> Environmental crimes consist of wide variety of corporate crime in the forestry sector, illegal mining, illegal fishing, trafficking in hazardous waste and unnatural exploitation of natural resources<sup>iv</sup>. Green-collar crime, which is a crime committed against the environment (nature). This term can refer to actual crime, in the sense that the act is illegal by the country's law, or a moral crime that may not be illegal<sup>v</sup>. Green Collar crimes are designated under the organized criminal activities in the world and comes under the fourth largest areas of crime in the list of structured crimes around the world.<sup>vi</sup> There is no universal definition of green collar crimes it is interpreted vividly. As per the United Nations Crime and Justice Research Institute, interpretation, environmental crimes include various illicit activities, such as illegal trade in wildlife; smuggling of ozone-depleting substances; illicit trade of hazardous waste; illegal, unregulated, and unreported fishing; and illegal logging and trade in timber etc.<sup>vii</sup> Generally it can be precisely summed up as any illegal activity endangering environment or eco system can be covered within the ambit of 'Environmental Crimes. It is environmental laws that regulate the environmental protection bodies and make them effective.<sup>viii</sup> Environment Jurisprudence refers to the laws relating to Environment. Its highest achievement lies in the codification of a change in ethics and its recognition as dual responsibility of individual and governmental agency with encompasses the natural world<sup>ix</sup>. According to United Nations Environmental crimes are potentially equipped to threaten Nation's security and sustainable development therefore needs to be taken seriously."<sup>x</sup>

The right to environment is enshrined in the basic framework of international law as well as law of the land and has been asserted time and again by the judiciary through several cases.

## **TYPES OF GREEN COLLAR CRIMES**

*Green Collar Crimes are those crimes which are committed against the Environment and wildlife.*<sup>xi</sup> Environmental crimes include air pollution, water pollution, deforestation, species declination of species and hazardous waste dumping.<sup>xii</sup> The acts damaging the environment and wildlife are called as green collar crimes<sup>xiii</sup> and they *include*:

- Poaching<sup>xiv</sup>
- Illegal trade of wildlife<sup>xv</sup>
- Wild life illegal trade<sup>xvi</sup>.
- Unreported fishing<sup>xvii</sup>
- Illegal logging<sup>xviii</sup>
- Air Pollution
- Water Pollution
- Noise Pollution
- Environment Pollution
- Illegal mining
- Hazardous waste dumping
- E-Waste dumping

### ***Reasons for increasing 'Green collar crimes'***

Healthy environment is essential to maintain ecological balance and every human being has the responsibility to take care of the same and if they cannot reduce the pollution they should at least refrain from polluting it. People fail to relies their responsibilities and perceive it to be

the sole responsibility of State, in addition they are busy trying to meet both the ends of their lives by earning their livelihood and there is no leadership to create awareness about the issues with common people. Environmental jurisprudence in India has failed to address the issue relating to green collar crimes<sup>xix</sup>. Wild life trafficking and other related crimes are increasing with the technological advancement as the trade is now being done online rather offline<sup>xx</sup>

## **INTERNATIONAL LEGAL FRAMEWORK RELATING TO ENVIRONMENT PROTECTION**

- The Stockholm Declaration 1972- it was a first major attempt to consider the global human impact on the environment, and an international attempt to address the challenge of preserving and enhancing the human environment.
- The Rio Declaration 1992-is a set of principles that recognize the importance of preserving the environment and set forth international guidelines for doing so.
- The UN Environment Assembly - is the world's highest-level decision-making body on the environment, with a universal membership of all 193 Member.

## **INDIAN LEGAL FRAMEWORK**

Indian Constitution has certain provisions relating to environment in order to ensure justice to people from environmental aspect.

**Article 21**, “No person shall be deprived of his life or personal liberty except according to procedure established by law.” As already discussed, it also includes the right to environment, most of the PIL’s are due to this interpretation of Article 21.

**Article 48 A** – directs the states to protect and improve the natural environment and to safeguards forests and wildlife.

**Article 51-A (g)** of the Indian Constitution - imposes fundamental duties to protect and improve the natural environment including forests, lakes, rivers and wild life, and to have compassion for living creatures

## **STATUTORY PROVISIONS**

The following are the statutory provisions relating to Environmental protection in India

- Indian Penal Code, 1860 -(Section 268-294-A) of the Penal Code deals with the offences related to safety, public health, etc. These sections make public health a priority and any act which pollutes environment and make the life of an individual dangerous is punishable under the Code.
- The Wildlife Protection Act, 1972’ -To prohibit the hunting of specified wild animals, birds and plants.
- The Water Act, 1974-To punish the violators of the act and provides for the criminalization of the corporate personnel who pollutes the environment<sup>xxi</sup>.
- The Air Act, 1981
- The Forest Conservation Act, 1980
- The Environment Protection Act, 1986-An umbrella legislation with many objectives<sup>xxii</sup>.
- Public Liability Insurance Act, 1991
- Hazardous Wastes (management, handling and trans-boundary) Rules, 2000
- Noise Pollution (regulation and control) Act, 2000
- Biological Diversity Act, 2002

- National Green Tribunal Act, 2010-a law can be made under Art. 253 of the Constitution of India read with Entry 13A of List I of Schedule VII to give effect to decisions taken in Stockholm Conference of 1972 and Rio Conference of 1992.

## **JUDICIAL AND QUASI-JUDICIAL BODIES FOR ENVIRONMENTAL PROTECTION IN INDIA**

- Supreme Court of India
- High Courts
- District Courts and Subordinate Courts
- National Green Tribunal
- National Environmental Appellate Authority
- Central Pollution Control Board
- State Pollution Control Boards
- State Biodiversity Board
- Chief Forest Conservators
- Factory Inspectors
- District Collectors
- Executive Magistrates

### ***Judicial Approach towards Green Collar Crimes in India***

The credit of development of Environmental Jurisprudence in India goes to activist approach<sup>xxiii</sup> adopted by Indian Judiciary in the form of PIL Public Interest Litigation. M.C. Mehta's public interest environmental litigation<sup>xxiv</sup> cases lead the baton for establishing and developing environmental jurisprudence in India.

In *A. P. Pollution Control Board v. M. V. Nayudu*<sup>xxv</sup>, Court held that reservoirs are significant for people as they upon them for drinking water and even good safeguards good could be failed because of any error human operation or by an accident. As the government had already made a policy decision through a notification stating that in order to set up industry the applicant must seek permission from the respective Pollution Control Board for which a 'No Objection Certificate' will be issued; hence the court could not supersede the policy decision of the Government therefore declined to issue NOC to respondent. Through this judgment the Apex court expressed that necessity of establishing environmental courts for early disposal of cases concerning environmental law.

In *M.C Mehta v. Union of India*<sup>xxvi</sup> (Oleum Gas Leak case)

This was a landmark judgment through which Judiciary explored its creativity by introducing the concept of absolute liability. This was the pioneering Judgment given by Indian Court wherein damages were awarded in the form of compensation to the victims of the gas leak. The judges instead of following the concept of Strict Liability from *Ryland v. Fletcher*<sup>xxvii</sup>

In *M.C Mehta v. Union of India*<sup>xxviii</sup> (Ganga case)

The court ordered closure of tanneries on the banks of river Ganga for violating the norms by not setting up water treatment effluent plants and thereby causing water and environment pollution.

**The Bhopal Gas Tragedy Case**<sup>xxix</sup> unfortunately the case is relating to worst tragedy caused by human action affecting around 500,000 people. The tragedy occurred in December 1984 and in the month of February 1985; by Indian Government before U.S. Court and claimed \$3.3 billons against the Union Carbide Corporation. By the next consecutive year 1986 these litigations were transferred to India on the grounds of convenient forum and smooth trial. During the course in March 1985, the Bhopal Gas Leak Disaster (Processing of Claims) Act was passed empowering the Central Government to become the sole representative of all the

victims so that their compensation claims get settled speedily. In 1987, the Bhopal District Court ordered the Union Carbide Corporation for payment of 350 crores as interim compensation but the UCC refused to pay the compensation amount as the interim order could not be decreed. Later on, the amount of compensation was reduced by the High Court, to 250 crores. After which Special leave appeals were filed by Government of India and Union Carbide against the order of high court. Later in 1989 out of settlement took place between union government and Union Carbide and liability of UCC was fixed to \$470 million as full and final claims for settlement and hence forth whole responsibility for future claims and liabilities both civil and criminal will that of Government of India and responsibility of UCC will be limited to \$470 million. Several review petitions were filed before Supreme Court questioning validity of settlement order.

Ironically the Supreme Court rejected all the contentions except the condition quashing the criminal proceedings and upheld the validity of the settlement order was upheld in the case, *Union Carbide Corporation v Union of India*<sup>xxx</sup>, the judgement being delivered on October 3, 1991. The criminal proceedings were initiated under Section 304 A, and Sections 336, 337, and 338 read with Section 35 of the Indian Penal Code. Section 304 A deals with causing death by negligence. Sections 336, 337 and Section 338 deal with the offences of endangering life and personal safety of others. Finally The Union Carbide Corporation was not held criminally liable hindering the development of criminal jurisprudence of environment.

***Dwarka Cement Works v. the State of Gujarat***<sup>xxxii</sup>: the court observed that due to lack of stringent legislation the corporations are able to escape their liability in cases relating to environmental crimes by framing lame excuses.

Despite having enough legislation with respect to environment it is an undeniable fact that the rate of environment crimes is increasing with the pace of development. Time and again it was judicial activism through PIL and Environmental Activist M.C.Mehta<sup>xxxiii</sup> which led to the



development of environmental jurisprudence in India through various cases new doctrines and principles were put forth by judiciary while dealing with cases relating to environment crimes.

*Indian Council for Environmental-Legal Action v. Union of India*<sup>xxxiii</sup> the court by applying the principle of polluters pay principle held that the polluter is liable to make good the loss caused to any other individual despite taking reasonable precautions at the time of performance of his activity. The court suggested for establishment of environmental courts in order to ensure that environmental matters were given the constant and proper consideration according to the need of the hour.

Pursuant to the observations of the Supreme Court of India need for establishment of environmental court was felt and was proposed by the law commission.

## **186<sup>TH</sup> REPORT OF LAW COMMISSION**

The report Proposed to Constitute Environment Courts in September 2003. This recommendation was based on a review of the technical and scientific problems that came before the courts and the inadequacy of judicial knowledge on the scientific and technical aspects of environmental issues.<sup>xxxiv</sup>

## **ESTABLISHMENT OF NATIONAL GREEN TRIBUNAL**

In 2010 NGT was established as a specialised judicial body equipped with expertise for the purpose adjudicating environmental cases; with the aim of providing speedy justice and decreasing the burden of high courts. Each bench of the tribunal is to be equipped with expert judicial authorities in the field. The jurisdiction of NGT consists of three forms of jurisdiction: original, appellate and special jurisdiction.<sup>xxxv</sup> It has set certain norms to deal with

environmental cases against the polluters (mainly government bodies and private firms), but not for day-to-day activities of the people which pollute the environment sizeably.<sup>xxxvi</sup>

## ROLE OF NGT IN COMBATING GREEN COLLAR CRIMES

*Manoj Mishra v. Delhi Development Authority*<sup>xxxvii</sup> (Art of Living case) The National Green Tribunal (NGT) held Sri Sri Ravi Shankar's Art of Living responsible for the damage to the Yamuna floodplains caused by the holding of the World Culture Festival in 2016.<sup>xxxviii</sup> NGT ordered to pay initial compensation as determined by the Expert Committee of the Tribunal sum of Rs 120 Crore; later the amount was reduced to Rs 28.73 Crore. Finally, the Tribunal asked the organizers to deposit an amount of Rs 5 Crore, out of that Rs 25 Lakh would have to be deposited in advance as a pre-condition for hosting the event. DDA was authorized to recover additional compensation and refund the surplus if any. Analysis of the case reveals that minimal scientific approach or objective criteria was employed by the tribunal at the time of awarding compensation. The role of DDA was not questioned and the right of organizers to hold the event was ignored. The sole concentration was on pollution and other legal issues were side lined.

Role of Committee comes within the scanner as to how it solely held the organizers of the event responsible when the same committee in 2013 after an extensive research reported<sup>xxxix</sup> that there was no natural vegetation in that area and biodiversity was compromised. The committee recommended to the NGT in 2016 that the organizers will be responsible for the “*restoration of the fauna such as fish*” in the floodplain. NGT appointed panel blamed Sri Sri Ravi Shankar's Art of Living (AOL) Foundation for complete destruction of the Yamuna floodplains<sup>xl</sup>. Ironically NGT turned a blind eye towards the contradiction. If the floodplain was already polluted for such a long time, then why the organizers would be solely held responsible for its destruction?

***Doaba Paryavaran Samiti v. State of U. P***<sup>xli</sup> while hearing a petition filed by NGO alleging pollution in Kali Nadi, Krishna and Hindon rivers, resulting in diseases and deaths of some inhabitants of the area; held that damage from pollution no less than damage from other heinous crimes: NGT<sup>xlii</sup>.

***Prafulla Samantray v. Union of India***<sup>xliii</sup> In this case NGT suspended Orissa government's order of establishing steel plant of Pohang Iron and Steel Company (POSCO) through FDI (Foreign direct investment) as the project would have caused damage to the ecological system of the area.

***In Re: Water Pollution by Tanneries at Jajmau, Kanpur***<sup>xliv</sup> v. Uttar Pradesh and ***In Re: Water Pollution at Rania, Kanpur Dehat & Rakhi Mandi, Kanpur Naga v. Uttar Pradesh*** NGT ordered complete closure of all tanneries causing damage to river Ganga and directions were issued against the Uttar Pradesh government for payment of Rs. 10 crores as compensation for causing damage to the environment.

#### ***Array Forest case***

The ambitious underground Mumbai Metro Project got BMC nod to cut 2,646 trees. The decision was opposed by green activists and local residents. plea was filled before Bombay High Court which declined to declare Array as Forest area than the matter was referred to NGT's western bench in Pune against the MMRCL, seeking that Aarey be designated as a forest which was declined rather NGT expressed its inability to do so but on the contrary lifted the stay on debris dumping, tree felling and land reclamation at Aarey, and issued as an interim order allowing all construction activities.<sup>xlv</sup> Appeal was made to Apex Court which was dismissed.<sup>xlvi</sup>

**STATISTICS OF ENVIRONMENTAL CRIMES IN INDIA**

<b>Environment Acts</b>	<b>Offences in 2018</b>	<b>Offences in 2019</b>	<b>Percentage change</b>
The Forest Act & The Forest Conservation Act	2768	2112	-23.70
The Wildlife Protection Act	782	618	-20.97
The Environmental (Protection) Act	86	487	466.28
The Air & The Water (Prevention & Control of Pollution) Act	17	160	841.18
The Cigarette and Other Tobacco Products Act	23517	22667	-3.61
Noise Pollution Acts	7947	8537	7.42
The National Green Tribunal Act	79	90	13.92
Environment & Pollution– Related Acts	35196	34671	-1.49

**Source:** NCRB Data

At least 34,671 crimes related to environment were recorded in 2019<sup>xlvii</sup>, compared to 2018's when there were 35,196 environment-related crime cases. Offences under Air / Water (Prevention & Control of Pollution) Act and Environmental (Protection) Act increased by over 841 per cent and 466 per cent within a short span of time between 2018 and 2019.

	<b>Environment-related crimes registered</b>	<b>Cases pending police investigation</b>	<b>Cases pending in court</b>
2018	35,196	6,281	48,238
2019	34,671	7,164	49,877

**Source:** NCRB Data

In 2019, 34,671 environment-related crimes were registered. Over 7,000 cases were pending police investigation, and almost 50,000 cases were pending trial in courts. According to the Managing Editor<sup>xlviii</sup> of Down To Earth, Indian courts it will take around 33 years to clear a backlog case related to environmental crimes with the current speed.<sup>xlix</sup> All 73 cases registered under the National Green Tribunal were pending trial by the end of 2018. Similarly, just 20 out of 665 court cases under the Environment (Protection) Act went to trial.<sup>1</sup>

## **CRITICAL ASSESSMENT ABOUT ENVIRONMENTAL JURISPRUDENCE IN INDIA**

M.C. Mehta's public interest environmental litigation cases laid the foundation stone of Environment jurisprudence in India. The core credit of its development goes to judicial activism.<sup>li</sup> The laws relating to environment play a vital role in regulation of the environmental protection bodies and its effective implementation mechanism. Environment protection got constitutional status after the 42<sup>nd</sup> Constitutional amendment; through DPSP. Under Article 48 A and in Fundamental duties under Article 51 A (g) clause was inserted making it obligatory to protect the environment<sup>lii</sup>. Courts have considered human rights and environmental protection similarly and acted as the guardian of fundamental rights of individual even with respect to environment but reading it harmoniously under Article 21.<sup>liii</sup> Judiciary ensured legal effectiveness with respect to environment jurisprudence. The higher Judiciary, Quasi-Judicial authorities and National Green Tribunal have set certain norms to deal with cases relating to green collar crimes in India. These bodies concentrate on corporate bodies and organizations violating environmental norms but they seldom pay heed to individual activities that equally contribute in increasing rate of green crimes.<sup>liv</sup> The Judicial authorities are overburdened with cases and hence rely upon expert committees by delegating their own work which often goes unchecked as in case of Art of living foundation when contradictory reports were given by the expert committee. National Green Tribunal has failed to maintain equilibrium between

sustainable development goals and resource development growth.<sup>lv</sup> Even the Apex court failed to meet the expectations of green activists in Array Forest case.

## CONCLUSION AND SUGGESTIONS

The judiciary initially gained success in attempting to resolve the conflict between the development and environment. The development of environmental jurisprudence in India is the outcome of Public Interest Litigation (PIL). Environmental crime is synonymously called as green collar crime is adversely affecting the ecosystem and resulting in environment degradation. Sustainable development goals have been set forth globally. Despite having ample legislations and Judicial and quasi-judicial authorities to meet the challenges posed due to increasing environment crimes no concrete solution seems to succeed as the green collar criminals responsible for commission of environmental crimes are using new means of committing illegal activities. Even the institutional redesigning of judicial structure in the form of pollution control boards, NGT and even presence of Supreme Court and High Court are failing to decrease the pendency of environment crimes before judiciary. Investigation machinery is too slow to investigate. Achieving the Constitutional goal of environment protection is becoming difficult in lieu of pendency of cases relating to environmental crimes in India.

There is absence of universal definition of Environmental crimes making it difficult to identify which activity can be covered within the ambit of Green Collar Crimes. The so-called Expert committees created under NGT are delegated important functions and excessive delegation of powers to these committees is causing hindrance in identification of environmental crimes and ultimately the Environment is being victimised. The state agencies unable to enforce the environmental laws effectively.

There is urgent necessity of creating Special legislation relating to green collar crimes. A universal definition of green collar crime or Environmental crimes is need of the hour so that it helps to identify exactly which activity can be said to be Environmental crime. Green collar crimes have an adverse effect on whole ecosystem consisting of living organisms resulting in Environment degradation and thereby pose threat to life and health of living creatures. For environmental crimes mere payment of damages in the form of compensation will not suffice. Depending upon the severity of crime liability of green collar crimes needs to be fixed. Number of Environment courts must be increased; investigative machinery should work at faster pace to ensure speedy justice. Judiciary must function impartially and take stringent actions against the green criminals. Judiciary must ensure to main a balance between sustainable development and resource development growth. The members of expert committee must be selected on the basis of their area of expertise in assessing the damage caused and capability of understanding the severity of environmental crime committed. Overall awareness relating to green collar crimes is required through campaigns in the form of seminars, conferences etc. Special training needs to be given to expert committee members to analyse the impact of various activities on Environment. Muscle power, Money power or Political power must not be misused to refrain judiciary from delivering impartial judgements.

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## ENDNOTES

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<sup>vi</sup>R. Baghel *Green Collar Crimes – A Crime against Environment and Wild life* The International Journal of Law Management & Humanities Volume IV, Issue I, 2021 Doi. one/10.1732/IJLMH.25861

<sup>vii</sup>A. Singh, *Environmental criminal law: Is it the need of the hour in India?* July 29, 2021

<sup>viii</sup> Verma RK. *Environmental Jurisprudence in India (Is People's Attitude Under Its Purview?)*. Indian Journal of Public Administration. 2019; 65(4):916-929. doi:10.1177/0019556119889210

<sup>ix</sup>K.A.Emina *Overview of Environmental Jurisprudence within Environmental Ethics* Journal Pemikiran Ilmiah dan Pendelikon Administrasi Perkantoran Vol. 6, No. 1, January-June 2020, Page 53

<sup>x</sup> Blog by DTE Staff *State of India's environment: Environmental crime cases piling up, disposal slow Over 50,000 environment-related cases pending trial. To clear the backlog, courts will have to dispose of 137 cases every day* February 24 2021 [www.downtoearth.org](http://www.downtoearth.org)

<sup>xi</sup> *Ibid*

<sup>xii</sup> Dr. M. L. Kalicharan *Environmental Crimes - Problems and Solution* AIR 2012

<sup>xiii</sup> Akkhana, *Crime Against Environment and Wildlife- A Crime against Humanity* as accessed from [www.legalserviceindia.com](http://www.legalserviceindia.com) on Aug 26,2021 10:41 AM IST

<sup>xiv</sup> Illegal hunting, capturing, and often killing of wild animals

<sup>xv</sup> The unlawful harvest of and trade in live animals and plants or parts and products derived from them

- <sup>xvi</sup> Trade of unregulated and illegal products, for financial and material gains- for example trade of timber, ivory, rhino horns or even sandalwood
- <sup>xvii</sup> Illegal fishing refers to fishing goings-on that are carried out by overseas vessels with no authorization in waters under the control of another state, or which breach its fisheries rules and regulations in some other way.
- <sup>xviii</sup> Illegal logging is the harvesting, processing, transporting, buying or selling of timber in contravention of national and international laws.
- <sup>xix</sup> Verma RK. *Environmental Jurisprudence in India (Is People's Attitude Under Its Purview?)*. Indian Journal of Public Administration. 2019;65(4):916-929. doi:10.1177/0019556119889210
- <sup>xx</sup> The World Wildlife Crime Report 2020
- <sup>xxi</sup> S. 47
- <sup>xxii</sup> M.Kesava *An analysis of Environmental Jurisprudence in India* Journal on Contemporary Issues of Law [JCIL] Volume 4 Issue 3 P-114
- <sup>xxiii</sup> Dias, Ayesha. *Judicial activism in the development and enforcement of environmental law: some comparative insights from the Indian experience*. Journal of Environmental Law Vol. 6, no. 2, 1994, Pp. 243–262. [www.jstor.org/stable/44247997](http://www.jstor.org/stable/44247997) Accessed on Aug.17, 2021.
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- <sup>xxv</sup> 1994 (3) SCC 1
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- <sup>xxvii</sup> (1868) LR 3 HL 330
- <sup>xxviii</sup> 1988 AIR 1115, 1988 SCR (2) 530
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- <sup>xxxix</sup> Restoration and Conservation of River Yamuna” Expert-Committee-Report-19.04.2014 [dpgs.delhigovt.nic.in > sites > files > All-PDF Pp-4](http://dpgs.delhigovt.nic.in/sites/files/All-PDF/Pp-4)
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- <sup>xli</sup> Tribunal in O.A. No. 231/2014 & 66/2015
- <sup>xlii</sup> Outlook the news Scroll February 7, 2021 [www.outlookindia.com](http://www.outlookindia.com) August 17 2021
- <sup>xliii</sup> Appeal 8/2011 (2012.03.30)
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- <sup>xlviii</sup> Richard Mahapatra
- <sup>xlix</sup> *Down To Earth's State of India's Environment* June 4 2020
- <sup>l</sup> *Ibid*
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