

# Analytical Study on the Scope of Supreme Court Judgments on Crimes Related to Environmental Laws in India

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## Abstract

This paper analyses the scope, effect, and limits of Supreme Court of India (SC) judgments in the domain of environmental crimes. Over the last four decades the Court has transformed environmental jurisprudence in India by importing global principles (precautionary principle, polluter-pays, sustainable development) and by developing doctrines such as absolute liability and expanded public interest remedies. Yet when it comes to criminal accountability for environmental harm the picture is mixed: the Court's judgments have expanded avenues for redress and deterrence but face institutional, statutory, and doctrinal constraints that limit enforcement, criminal prosecution, and effective punishment. This study examines the major Supreme Court decisions, evaluates how they treat criminal liability (for individuals, officials, and corporations), identifies gaps between judicial pronouncements and practical enforcement, surveys recent trends, and suggests legal and policy reforms to strengthen criminal enforcement for environmental offences.

**Keywords:** MC Mehta (Oleum gas leak), Vellore Citizens' Welfare Forum, Indian Council for Enviro-Legal Action, and recent SC/NGT interactions.)

## 1. Introduction

The Supreme Court of India has played a transformative role in shaping the environmental governance landscape of the country. Through expansive interpretations of constitutional provisions—especially Articles 21, 48A, and 51A(g)—and by innovating doctrines such as the public trust doctrine, polluter pays, precautionary principle, and absolute liability, the Court has significantly broadened the scope of environmental protection. These judgments have been central to the development of criminal accountability for environmental violations, often stepping in where statutory enforcement mechanisms were weak.

Environmental crime — conduct that violates statutory standards designed to protect air, water, soil, biodiversity, and public health — raises peculiar challenges. Many environmental statutes create administrative and civil remedies, but criminal sanctions remain an essential tool for deterrence where negligence, willful violations, or regulatory capture lead to severe harm. India's Supreme Court, through a prolific output of public interest litigation (PIL) and constitutional adjudication, has been central in shaping environmental law. The Court has repeatedly used constitutional writs (Article 32/226) to compel

remediation, order monetary compensation, and impose operational restrictions on polluters. However, the Court is not a criminal court; its interventions in criminal enforcement are exercised through directions and principles rather than by conducting prosecutions. This raises questions: How far can Supreme Court judgments reach to punish environmental crimes? What doctrines have been developed? What are the practical and legal limits to using SC judgments to achieve criminal accountability?

This paper investigates these questions by (1) surveying landmark SC decisions establishing principles relevant to environmental crimes; (2) analyzing the Court's role in directing criminal investigations and punishment; (3) identifying doctrinal and institutional constraints on criminal enforcement; and (4) offering recommendations to enhance the role of criminal law in environmental protection.

## 2. Legal and Institutional Framework (200 words)

India's environmental governance operates through a dense statutory framework comprising sector-specific laws such as the Water Act, 1974; Air Act, 1981; Environment (Protection) Act, 1986; Wildlife (Protection) Act, 1972; Coastal Regulation Zone norms; and Hazardous Waste Rules. These legislations combine administrative mechanisms—like permits, standards, and closure directions—with criminal liability provisions prescribing fines and imprisonment for violations. Criminal enforcement generally requires detection by regulatory authorities, investigation by police, and prosecution under the Code of Criminal Procedure.

Adjudication of environmental offences primarily occurs in regular criminal courts. The National Green Tribunal (NGT), established in 2010, exercises civil jurisdiction over environmental disputes and can order restoration and compensation, but does not try criminal offences. The Supreme Court's role is distinctive: though not a trial court for crimes, it exercises constitutional powers to enforce fundamental rights, compel state action, and strengthen accountability for environmental violations.

Constitutional Expansion – Article 21, The Supreme Court interprets Article 21's Right to Life to include the right to clean air, safe drinking water, and a pollution-free environment. Consequently, breaches of environmental laws—such as illegal mining, toxic discharge, and deforestation—are treated as fundamental rights violations.

Integration with Directive Principles & Fundamental Duties, Article 48A: - Duty of the State to improve the environment. Article 51A(g): - Duty of citizens to protect nature. The Court uses these principles to justify stringent judicial interventions against environmental crimes.

## 3. Major Doctrines Developed by the Supreme Court

The Supreme Court of India has developed a series of foundational doctrines that significantly shape the enforcement of environmental laws, including the treatment of environmental violations as serious public wrongs. These doctrines strengthen civil, administrative, and indirectly criminal accountability.

### 3.1 Polluter-Pays and Precautionary Principles

A major doctrinal shift occurred in *Vellore Citizens' Welfare Forum v. Union of India* (1996), where the Court explicitly incorporated the Polluter-Pays Principle and the Precautionary Principle into Indian environmental jurisprudence. These internationally recognised principles were held to be part of domestic law under Articles 21, 47, 48A, and 51A(g). The Court emphasized that environmental harm must be prevented even in cases of scientific uncertainty, shifting the burden of proof onto industries to demonstrate that their activities are not harmful. The Polluter-Pays Principle reinforced financial and restorative liability by requiring polluters to remediate damage and compensate affected communities.

Although Vellore focused primarily on remedial actions such as closure of polluting units and environmental restoration rather than direct criminal prosecution, it broadened the concept of “environmental crime” to include economic liability and mandatory compensation.

### **3.2 Strengthening Compensation: Indian Council for Enviro-Legal Action**

In the Bichhri village pollution case (Indian Council for Enviro-Legal Action v. Union of India, 1996), the Court reaffirmed Polluter-Pays by directing hazardous chemical units to bear the full cost of environmental remediation. Though civil and compensatory in nature, this judgment strengthened the criminal enforcement framework by highlighting the measurable and quantifiable harm caused by statutory violations. This recognition has increasingly supported demands for criminal prosecution of regulatory non-compliance.

### **3.3 Absolute Liability: M.C. Mehta (Oleum Gas Leak, 1987)**

The doctrine of Absolute Liability—established in M.C. Mehta v. Union of India following the Oleum gas leak—holds hazardous industries strictly and unconditionally liable for harm caused by their operations. Unlike strict liability, it allows no exceptions. Although primarily civil in orientation, it has heavily influenced punitive regulatory actions and increased expectations for prosecution in cases of reckless industrial behavior.

### **3.4 Public Trust Doctrine**

The Court’s articulation of the Public Trust Doctrine positions the State as a trustee of natural resources. Illegal sand mining, unauthorized deforestation, encroachment on wetlands, and diversion of forest land thus constitute not only statutory violations but breaches of public trust, potentially amounting to criminal misconduct.

## **4. Landmark Supreme Court Judgments and Their Analytical Significance**

### **4.1 M.C. Mehta Cases (Series)**

The M.C. Mehta PIL series forms the cornerstone of India’s judicially developed environmental law. These cases transformed constitutional environmental principles into enforceable legal duties, elevated acts of environmental harm into legally cognizable misconduct, and strengthened criminal accountability for both industries and public bodies. The Supreme Court’s interventions addressed regulatory gaps and laid down enduring doctrines that guide environmental governance.

**Oleum Gas Leak (1986–87):** Following the Shriram Fertilizers gas leak, the Court introduced the doctrine of absolute liability, holding hazardous industries strictly liable for harm regardless of negligence or exceptions. This uniquely Indian principle shifted the burden of proof to industrial operators and provided a strong foundation for criminal prosecution of industrial accidents.

**Ganga Pollution Cases (1985–98):** The Court tackled large-scale river pollution by tanneries and municipalities, ordering closure of non-compliant industries and enforcing the Water Act. Importantly, it recognized municipal authorities as “persons” liable for statutory offences, making administrative negligence a prosecutable environmental crime.

**Doon Valley Mining (1985):** By banning unregulated limestone mining, the Court treated illegal mining as an ecological offence with long-term consequences, paving the way for stricter enforcement in forested and tribal areas.

**T.N. Godavarman (1995–present):** The Court halted illegal logging, regulated forest land diversion, and established the Central Empowered Committee (CEC), effectively positioning itself as a national forest regulator and converting forest violations into continuously monitored environmental crimes.

**Taj Trapezium & Delhi Pollution Cases (1993–2015):** Orders mandated relocation of polluting industries, adoption of cleaner fuels, and conversion of public transport to CNG. The Court treated ongoing air pollution as a “continuing offence,” expanding Article 21 to include the right to clean air and enabling criminal prosecution under the EPA.

**Hazardous Waste & Yamuna Cases (1995–2012):** The Court condemned illegal hazardous waste handling, directed prosecution of violators, and held municipalities and industries accountable for untreated effluents, exposing systemic enforcement weaknesses.

**Doctrinal Legacy:** Across these cases, the Supreme Court established key principles—Absolute Liability, Polluter Pays, Precautionary Principle, Public Trust Doctrine, and Continuing Mandamus—that have redefined environmental governance and reinforced the legal framework for prosecuting pollution, ecological harm, and regulatory non-compliance.

#### **4.2 T.N. Godavarman Thirumulpad v. Union of India (1995–present)**

The T.N. Godavarman litigation, initiated in 1995, is the most transformative judicial intervention in India’s forest governance. What began as a complaint about illegal timber felling in the Nilgiris evolved into a continuing mandamus that restructured national forest administration, strengthened regulatory enforcement, and elevated forest offences to the level of serious environmental crimes. The Supreme Court assumed an unprecedented supervisory role, effectively acting as the country’s primary forest regulator.

The original petition exposed widespread failures in enforcing the Forest (Conservation) Act, 1980 (FCA)—including illegal logging, unauthorized mining, encroachments, and misuse of forest land—prompting the Court to expand the scope of litigation to address systemic deficiencies nationwide.

**Expanded Definition of “Forest” (1996):** The Court interpreted “forest” according to its dictionary meaning, extending FCA protection to private forests, unclassified forests, and ecologically sensitive areas. This broadened legal coverage and strengthened prosecution for illegal mining and logging.

**Regulation of Timber and Sawmills:** Nationwide restrictions on tree felling and closure of thousands of unauthorized sawmills were ordered, along with prosecution of violators and seizure of illicit timber.

**Central Empowered Committee (CEC):** The CEC was created as an independent monitoring and investigative body to inspect forests, probe violations, and recommend punitive action.

**Mining Controls:** Mining without FCA clearance was treated as an environmental offence; numerous mining leases were suspended or regulated.

#### **4.3 Indian Council for Enviro-Legal Action v. Union of India (1996)**

Judgment is a milestone in India’s environmental liability framework. It arose from severe pollution in Bichhri village, Rajasthan, where chemical industries producing toxic substances such as “H-acid” discharged hazardous effluents into soil and groundwater, destroying agriculture and contaminating drinking water. The case, brought under Article 32, exposed regulatory failure and required the Court to determine the nature of liability for hazardous industries and the scope of judicial power to mandate environmental restoration.

**Key Judicial Principles:** The Court reaffirmed the doctrine of absolute liability, holding that industries engaged in inherently dangerous activities are fully responsible for environmental harm regardless of fault. This strengthened the legal basis for prosecuting pollution-related offences. It also gave concrete force to the polluter pays principle, directing the industries to bear the entire cost of cleaning contaminated soil and aquifers, compensating affected communities, and restoring the environment. By treating environmental degradation as a violation of Articles 21, 48A, and 51A(g), the Court elevated pollution from a mere regulatory lapse to a public wrong affecting fundamental rights.

Impact : The judgment remains central to environmental crime jurisprudence. It established that hazardous pollution triggers uncompromising financial and legal accountability and set a precedent for strict enforcement against industrial polluters across India.

#### **4.4 Lafarge Umiam Mining v. Union of India (2011)**

The Lafarge Umiam Mining v. Union of India (2011) judgment is a significant precedent on forest diversion, environmental clearances, and procedural scrutiny for projects in ecologically sensitive regions. The case arose from limestone mining in Meghalaya's East Khasi Hills for supplying a Bangladesh-based cement plant. Although the area was forested, authorities classified it as non-forest land and granted approvals without mandatory clearance under Section 2 of the Forest (Conservation) Act, 1980 (FCA). When these lapses surfaced, the Ministry of Environment and Forests suspended the project, prompting judicial review.

The Supreme Court identified major procedural failures, including inaccurate forest classification, inadequate environmental impact assessments, and insufficient due diligence by State authorities and the MoEF. It reaffirmed that FCA and Environment (Protection) Act clearances are mandatory, and operations without prior approval are technically unlawful.

A central contribution of the judgment was the development of a structured forest-clearance scrutiny model, requiring expert appraisal, accurate identification of forest land, evaluation of tribal and socio-economic impacts, mitigation measures, and cost-benefit analysis. Invoking the principle of sustainable development, the Court held that economic projects may proceed only with rigorous environmental safeguards.

Although the Court permitted mining after fresh clearances, it highlighted that misclassification, non-compliance, and unauthorized diversion can amount to environmental offences, reinforcing statutory accountability.

#### **4.5 Sterlite Industries (Thoothukudi) – 2018 & 2020: Industrial Pollution, Regulatory Failure and Constitutional Scrutiny**

The Sterlite Industries copper smelter dispute in Thoothukudi is one of India's most significant contemporary environmental conflicts, illustrating systemic pollution, regulatory lapses, and the evolving judicial approach to environmental crimes. Operational since 1996, the plant faced persistent allegations of releasing toxic sulphur dioxide, contaminating groundwater, mismanaging hazardous waste, and operating without valid statutory consents. Several studies by NEERI and expert committees confirmed violations of the Water Act, Air Act, and Environment (Protection) Act (EPA). Public resentment peaked in 2018 during protests against Sterlite's proposed expansion, culminating in police firing and civilian deaths.

In May 2018, the Tamil Nadu Pollution Control Board (TNPCB) ordered the disconnection of power supply and closure of the plant, citing repeated statutory violations and public safety concerns. The Tamil Nadu Government followed with a permanent closure order. Earlier, in *Sterlite Industries v. TNPCB* (2018), the Supreme Court imposed a ₹100 crore penalty for environmental damage, invoking the polluter-pays principle and acknowledging a history of regulatory failures. Although this order did not address closure, it strengthened the case for treating Sterlite's violations as environmental offences.

Sterlite challenged the shutdown before the National Green Tribunal (NGT), which allowed reopening after finding procedural irregularities in the closure process. However, in *Tamil Nadu v. Sterlite Industries* (2020), the Supreme Court set aside the NGT order, holding that the Tribunal had exceeded its jurisdiction and that challenges to State actions must be brought before the High Court. Importantly, the Supreme

Court reinstated the State’s closure order without examining the technical merits, reflecting procedural restraint and reinforcing State autonomy in environmental governance.

The Sterlite dispute highlights several environmental-crime dimensions: repeated statutory violations, mismanagement of toxic waste, SO<sub>2</sub> emissions beyond permissible limits, and unauthorized operation—offences under the Water Act, Air Act and EPA. Yet criminal prosecutions were minimal, underscoring systemic weaknesses in environmental enforcement and the phenomenon of “regulatory capture,” where TNPCB was criticized for inconsistent monitoring and lenient oversight.

Overall, the Sterlite litigation marks a shift from expansive judicial activism to a model emphasizing procedural scrutiny, State-led enforcement, and the centrality of community rights under Article 21. The Supreme Court’s stance ultimately upheld the plant’s closure, acknowledging large-scale environmental harm and the legitimacy of public resistance against hazardous industrial activities.

**Table 1: Major Supreme Court Environmental Judgments Impacting Environmental Crime Jurisprudence**

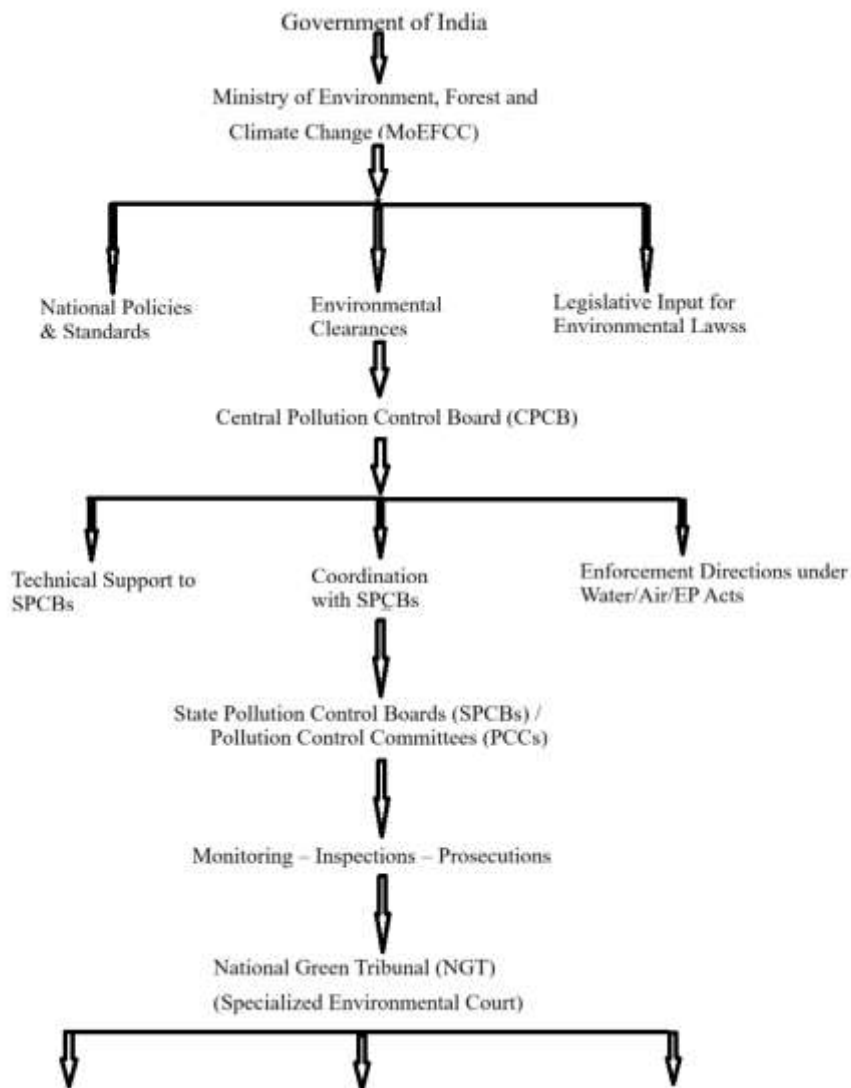
Sl. No.	Case Name & Citation	Year	Key Issue	Judicial Holding	Analytical Significance for Environmental Crimes
1	M.C. Mehta v. Union of India (Oleum Gas Leak Case)	1987	Leakage of oleum gas from Shriram Industries caused death/illness	Established <b>Absolute Liability</b> for hazardous industries	Transformed environmental accidents into <b>punishable environmental crimes</b> , removing all exceptions for industrial negligence
2	M.C. Mehta v. Union of India (Ganga Pollution Case)	1988	Tanneries and industries discharging effluents into Ganga	Directed closure of non-compliant industries	Elevated water pollution from regulatory lapse to <b>crime harming public health</b>
3	Rural Litigation & Entitlement Kendra v. State of UP (Dehradun Quarrying Case)	1985	Illegal limestone mining causing ecological degradation	Banned mining in Doon Valley	Set precedent that <b>illegal mining = ecological crime</b> , prioritizing environment over economic gain
4	T.N. Godavarman Thirumulpad v. Union of India	1995–present	Unregulated forest diversion and illegal logging	Expanded definition of “forest”, regulated clearances, stopped illegal felling	Considered forest violations as <b>national ecological crimes</b> and created monitoring mechanisms
5	Indian Council for Enviro-Legal Action v. Union of India	1996	Toxic chemical pollution harming villagers	Imposed heavy compensation on industries	Established <b>“Polluter Pays”</b> as enforceable; treated pollution as

					<b>community-level environmental offence</b>
6	Vellore Citizens' Welfare Forum v. Union of India	1996	Tanneries polluting agricultural land and water	Recognized <b>Precautionary Principle</b> & "Polluter Pays" as constitutional	Made environmental harm a <b>strictly punishable civil and quasi-criminal misconduct</b>
7	A.P. Pollution Control Board v. M.V. Nayudu	1999	Groundwater contamination; lack of scientific certainty	Favoured precaution, recommended scientific expertise	Recognized uncertainty as <b>no defence</b> for environmental offenders
8	Narmada Bachao Andolan v. Union of India	2000	Environmental displacement due to dam construction	Upheld dam with strict compliance standards	Reinforced mandatory EIA compliance; violations attract criminal liability
9	M.C. Mehta v. Union of India (Vehicular Emissions Case)	1998–2002	Severe air pollution in Delhi	Ordered conversion to CNG, relocated industries	Treated air pollution as <b>violation of right to life</b> , making it a punishable offence
10	Lafarge Umiam Mining v. Union of India	2011	Limestone mining in forest areas without proper clearances	Upheld clearances but emphasized compliance	Established that bypassing environmental clearance = <b>legal offence</b>
11	Goa Foundation v. Union of India	2014	Massive illegal iron ore mining	Cancelled 88 mining leases; ordered criminal probe	One of the strongest rulings treating <b>illegal mining as organized environmental crime</b>
12	Tehri Dam Case (N.D. Jayal v. Union of India)	2004	Dam safety and ecological concerns	Upheld project but strengthened compliance	Non-compliance with safety/environment norms leads to <b>criminal accountability</b>
13	Sterlite Industries v. Tamil Nadu Pollution Control Board	2018 & 2020	Copper plant causing air & soil pollution	Closure upheld	Reinforced that persistent non-compliance = <b>industrial environmental crime</b>
14	M.C. Mehta v. Kamal Nath	1997	Illegal diversion of forest land for a resort	Invoked Public Trust Doctrine	Held private encroachment on natural resources as <b>environmental crime against the public</b>

15	Subhash Kumar v. State of Bihar	1991	River pollution by slurry discharge	Affirmed right to clean water under Article 21	Clarified that pollution directly violates fundamental rights—thus qualifying as a serious offence
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**Appendix B: Institutional Framework Chart:**

Flow diagram of MoEFCC → CPCB → SPCBs → NGT → Judicial Oversight Committees.





### Appendix C: Summary of Doctrinal Principles

Doctrinal Principle	Brief Definition	Key Supreme Court Case References
<b>Polluter Pays Principle</b>	The polluter must bear the cost of preventing, controlling, and remedying environmental damage caused by their activities.	<i>Indian Council for Enviro-Legal Action v. Union of India</i> (1996); <i>M.C. Mehta v. Union of India</i> (Oleum Gas Leak, 1987)
<b>Precautionary Principle</b>	Lack of full scientific certainty should not delay measures to prevent serious or irreversible environmental harm.	<i>Vellore Citizens' Welfare Forum v. Union of India</i> (1996); <i>A.P. Pollution Control Board v. Prof. M.V. Nayudu</i> (1999)
<b>Public Trust Doctrine</b>	The State holds natural resources (air, water, forests, lakes) in trust for the public and must protect them from private exploitation.	<i>M.C. Mehta v. Kamal Nath</i> (1997); <i>Fomento Resorts v. Minguel Martins</i> (2009)
<b>Absolute Liability Principle</b>	Hazardous industries are fully liable for any harm from their activities, with no exceptions or defenses (e.g., act of God).	<i>M.C. Mehta v. Union of India</i> (Oleum Gas Leak, 1987); <i>Charan Lal Sahu v. Union of India</i> (1990)

### 5. How Supreme Court Judgments Influence Criminal Liability — Mechanisms and Limits

The Supreme Court of India has profoundly shaped criminal liability in environmental law, especially in the context of weak regulatory enforcement under statutes like the Water Act, Air Act, and Environment (Protection) Act (EPA). While the Court cannot prosecute offenders directly, its judgments influence how criminal liability is conceptualized, triggered, and enforced through doctrinal innovation, supervisory powers, and institutional oversight.

A primary mechanism is the development of declaratory doctrines and normative principles. The Court's articulation of doctrines such as absolute liability, polluter-pays, precautionary principle, and public trust doctrine has defined the interpretive framework for regulators, prosecutors, and lower courts. These doctrines do not create new offences but guide the assessment of severity and justification for criminal

sanctions. For instance, absolute liability holds hazardous industries responsible for environmental harm regardless of intent or negligence, expanding the basis for prosecution and framing violations as serious public wrongs.

The Court also issues directives to investigative agencies in Public Interest Litigations (PILs). Recognizing systemic weaknesses like compromised investigations and political interference, it has directed police, CBI, enforcement authorities, and environmental departments to investigate violations, submit periodic reports, and maintain compliance records. These measures activate criminal processes that might otherwise remain dormant due to bureaucratic inertia. In certain cases, the Court has explicitly directed registration of FIRs and initiation of prosecutions, particularly for illegal mining, industrial pollution, and regulatory non-compliance, ensuring accountability where executive action fails.

Another mechanism is punitive civil or regulatory measures, which have indirect criminal effects. Closure of polluting units, attachment of property, and large compensation orders create strong economic incentives for compliance, complementing criminal deterrence. Awards under Article 32 strengthen the conceptualization of environmental harm as real human, ecological, and economic injury, encouraging communities to pursue criminal complaints or civil actions.

The Court has further reframed environmental crimes as violations of fundamental rights under Article 21, linking pollution and ecological degradation to the right to life. This rights-based approach elevates environmental offences from technical infractions to serious public health and human rights violations, expanding moral and constitutional justification for enforcement.

Patterns in Supreme Court environmental jurisprudence show systemic judicial activism compensating for executive failures in pollution control, mining, forest management, and hazardous waste. Remedies have evolved from localized interventions to nationwide oversight, including closures, seizures, fines, and recommendations for prosecution. However, structural limitations persist: statutory offences often carry low penalties, are bailable or non-cognizable, and require complex scientific proof. Bureaucratic delays, political resistance, regulatory capture, and diffuse responsibility among multiple actors further constrain criminal enforcement.

Effectiveness is mixed. Judicial activism has successfully created normative and civil remedies, embedding global principles like absolute liability and polluter-pays into Indian law. Yet criminal convictions remain rare, and enforcement gaps continue. Recent interactions between the Supreme Court and the National Green Tribunal (2023–2025) illustrate the tension between procedural rigor and proactive prosecution. While the Court emphasizes procedural safeguards, the NGT is more willing to recommend prosecutions. The pattern highlights the continuing need for stronger statutes, specialized investigative and prosecution mechanisms, and corporate liability reforms to translate judicial principles into consistent criminal enforcement.

## 6. Conclusion

The Supreme Court's judgments have fundamentally shaped the understanding, scope, and enforcement of environmental crimes in India. In a landscape marked by weak administrative capacity, political interference, and fragmented regulatory mechanisms, the Court has emerged as the principal guardian of environmental governance. Its doctrinal contributions—most notably absolute liability, the polluter-pays principle, the precautionary principle, and the public trust doctrine—have transformed environmental protection from a technical regulatory area into a rights-based framework grounded in Article 21. These

doctrines offer a powerful normative foundation for criminal accountability, enabling courts and regulators to treat environmental harm as a serious societal and public health offence.

However, the Court's ability to directly strengthen criminal enforcement remains structurally limited. As a constitutional court rather than a trial court, it cannot conduct criminal trials, determine guilt, or impose imprisonment. Criminal justice requirements such as evidence standards, procedural safeguards, scientific causation, and investigative capacity place practical constraints on translating judicial principles into convictions. Moreover, statutory weaknesses—non-cognizable offences, low penalties, and recent dilution of criminal provisions—restrict the deterrent value of environmental crimes even when the Court advocates strict enforcement.

Thus, while the Supreme Court is an indispensable catalyst for environmental accountability, judicial action alone cannot substitute for systemic reform. Effective deterrence requires: (1) clear and enforceable statutory offences with proportionate penalties, (2) scientifically trained investigative and prosecutorial institutions, and (3) governance reforms ensuring political autonomy and administrative will. Only through this integrated framework can the Court's jurisprudence translate into consistent convictions, meaningful deterrence, and long-term ecological justice.

## 7. References

1. M.C. Mehta v. Union of India (Oleum Gas Leak), (1987) 1 SCC 395.
2. M.C. Mehta v. Union of India (Ganga Pollution Case), (1988) 1 SCC 471.
3. M.C. Mehta v. Union of India (Taj Trapezium Case), (1997) 2 SCC 353.
4. M.C. Mehta v. Union of India, (1999) 6 SCC 9 (Delhi Vehicular Pollution).
5. M.C. Mehta v. Union of India, (1997) 2 SCC 411
8. (Hazardous Waste Management).
6. M.C. Mehta v. Union of India, (2004) 12 SCC 118 (Yamuna Pollution).
7. The Public Liability Insurance Act, 1991.
8. M.C. Mehta v. Union of India, AIR 1987 SC 1086.
9. 9.Vellore Citizens Welfare Forum v. Union of India, AIR 1996 SC 2715.
10. Indian Council for Enviro-Legal Action v. Union of India,
11. AIR 1996 SC 1446.
12. T.N. Godavarman Thirumulpad v. Union of India, (1997) 2 SCC 267.
13. Sterlite Indus. (India) Ltd. v. Tamil Nadu Pollution Control Bd., (2019) 11 SCC 725.
14. Tamil Nadu v. Sterlite Indus. (India) Ltd., (2020) 11 SCC 775.
15. Lafarge Umiam Mining Pvt. Ltd. v. Union of India, (2011) 7 SCC 338.
16. Shrimali Sangita Pravinbhai, Dr. Alpesh Patel, Royal International Global Journal of Advance and Applied Research, ISSN: 2998-4459 | Website: <https://rlgjaar.com> Volume-2, Issue-9 | September – 2025