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Environmental Justice and the Right to a Clean Environment under Article 21 of the Indian Constitution: A Critical Analysis of Constitutional and Judicial Developments

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Abstract

Environmental protection has become an important concern in Indian constitutional law, particularly as pollution, environmental degradation and climate change increasingly affect people's health, livelihoods and quality of life. Over the years, the Supreme Court of India has interpreted Article 21 of the Constitution to include the right to live in a clean and healthy environment. While this judicial development has strengthened the legal protection of environmental rights, ensuring their effective implementation remains a major challenge. This paper examines the evolution of environmental justice in India, focusing on the constitutional provisions, judicial decisions and legal principles that have shaped the right to a clean environment. The study follows a doctrinal research methodology, drawing upon constitutional provisions, environmental legislation, landmark judgments and relevant academic literature. It discusses the role of the judiciary in developing principles such as sustainable development, precaution, polluter pays, public trust and intergenerational equity. The paper also considers the growing importance of climate justice, particularly in light of *M.K. Ranjitsinh v. Union of India* (2024), in which the Supreme Court recognized the right against the adverse effects of climate change under Articles 14 and 21. The analysis suggests that although Indian courts have made significant contributions to environmental protection, weaknesses in regulatory enforcement, unequal exposure to environmental harm, limited public participation and difficulties in accessing legal remedies continue to affect the realization of environmental rights. The study concludes that recognizing environmental protection as a fundamental right is an important step, but it cannot guarantee environmental justice on its own. Stronger institutions, consistent enforcement of environmental laws, greater public participation and accessible legal remedies are equally necessary. Protecting the environment must therefore be viewed not simply as a legal obligation, but as an essential part of safeguarding human dignity, ensuring social equality and securing a sustainable future.

Keywords: Environmental Justice, Article 21, Right to Clean Environment, Constitutional Law, Environmental Jurisprudence, Sustainable Development, Climate Justice.

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Introduction

The relationship between environmental protection and human rights has become one of the most significant developments in contemporary constitutional jurisprudence. Environmental degradation is no longer regarded exclusively as a matter of ecological conservation or administrative regulation. Rather, it has increasingly been recognised as an issue directly affecting human dignity, public health, equality, and the effective enjoyment of fundamental rights. Rapid industrialization, urban expansion, deforestation, increasing pollution, and climate change have created circumstances in which environmental protection has become indispensable to the preservation of human life. The growing recognition of environmental rights reflects an understanding that the right to life cannot be meaningfully enjoyed in the absence of clean air, safe drinking water, adequate sanitation, and a healthy ecological system.

In India, environmental concerns have acquired particular significance because economic development and environmental sustainability frequently intersect with questions of poverty, social inequality, and access to natural resources. Environmental degradation often imposes disproportionate burdens on economically disadvantaged communities that possess limited opportunities to avoid pollution or seek effective legal remedies. Industrial waste, contaminated water sources, inadequate sanitation, and exposure to hazardous environmental conditions may substantially affect the health and livelihoods of vulnerable populations. Consequently, environmental protection must be examined not only from the perspective of conservation but also through the broader framework of social and distributive justice. Environmental justice requires that environmental benefits and burdens be distributed fairly and that individuals and communities have meaningful opportunities to participate in decisions affecting their surroundings. The development of environmental justice in India has also been examined through historical and systematic scholarship (Rajan, 2014; Sidique & Zaidi, 2024).

The Indian Constitution does not expressly incorporate an independent fundamental right to a clean environment. Nevertheless, constitutional jurisprudence has substantially evolved through the interpretative approach adopted by the Supreme Court. Article 21, which guarantees the right to life and personal liberty, has emerged as the principal constitutional foundation of environmental rights. The judiciary has interpreted the expression "life" broadly to encompass more than mere physical existence, including the conditions necessary for a dignified and meaningful human life. This interpretation has enabled courts to recognize environmental protection as an essential component of constitutional governance and to impose corresponding obligations upon public authorities.

The constitutional development of environmental rights has been strengthened by Articles 48A and 51A(g), which emphasize the responsibility of the State and citizens to protect the environment. Judicial decisions have also incorporated internationally recognized environmental principles into Indian law, thereby expanding the scope of environmental accountability. Despite these developments, significant challenges remain concerning the implementation of environmental legislation, institutional effectiveness, public participation, and access to justice. Against this background, the present study critically examines the relationship between environmental justice and the right to a clean environment under Article

21, with particular emphasis on judicial interpretation and the practical realization of constitutional environmental guarantees.

Research Objectives and Methodology

The principal objective of the present study is to examine the constitutional and judicial foundations of environmental justice in India, particularly the recognition of the right to a clean and healthy environment under Article 21. The study seeks to analyse how judicial interpretation has transformed environmental protection from a primarily statutory obligation into a constitutionally protected interest. It also evaluates the contribution of landmark judicial decisions to the development of environmental principles and examines the relationship between environmental degradation, social inequality, and the effective realization of fundamental rights. Additionally, the study considers emerging questions of climate justice and identifies legal and institutional challenges affecting the enforcement of environmental rights.

The research adopts a doctrinal and analytical methodology based on the examination of primary and secondary legal sources. Primary sources include the Constitution of India, environmental legislation, and judgments delivered by the Supreme Court. Secondary sources include academic literature, international environmental instruments, and established principles of environmental jurisprudence. The study applies interpretative and critical legal analysis to evaluate the development of environmental rights and their relationship with constitutional values. Its scope is confined primarily to the Indian legal framework, although relevant international principles are considered to explain the broader evolution of environmental justice. As a doctrinal investigation, the research does not rely upon primary empirical surveys or independently collected environmental data.

Environmental Justice and Its Constitutional Foundations

Environmental justice is based on the principle that every individual should enjoy fair protection against environmental hazards and equal opportunities to benefit from environmental resources. The concept extends beyond the prevention of pollution and incorporates concerns relating to social equality, public participation, ecological responsibility, and access to effective legal remedies. It recognizes that environmental harm may have unequal consequences depending upon the economic position, geographical location, occupation, and social circumstances of affected communities. Accordingly, environmental justice seeks to ensure that no group is compelled to bear disproportionate ecological burdens merely because of limited political influence, economic resources, or social vulnerability.

The constitutional relevance of environmental justice becomes particularly apparent when it is examined in relation to Article 21 of the Indian Constitution. Article 21 provides that no person shall be deprived of life or personal liberty except according to procedure established by law. The Supreme Court has consistently interpreted the provision as encompassing the protection of human dignity and the essential conditions required for meaningful existence. The right to life therefore cannot be restricted to the prevention of arbitrary deprivation of physical existence. It necessarily includes the protection of those environmental conditions without which health, livelihood, and personal well-being may be seriously compromised. The judicial

inclusion of environmental quality within Article 21 has provided an important constitutional basis for challenging pollution and other forms of ecological degradation.

The constitutional framework for environmental protection is not confined to Article 21. Article 48A, introduced through the Constitution (Forty-second Amendment) Act, 1976, directs the State to endeavour to protect and improve the environment and safeguard forests and wildlife. Although this provision belongs to the Directive Principles of State Policy and is not independently enforceable as a fundamental right, it provides important constitutional guidance for environmental legislation and governmental policy. Similarly, Article 51A(g) imposes a fundamental duty upon citizens to protect and improve the natural environment, including forests, lakes, rivers, and wildlife. These provisions demonstrate that environmental responsibility has been incorporated into the constitutional relationship between the State, citizens, and natural resources. Bhullar (2022) further examines how the constitutional duty of citizens interacts with environmental rights and the questions surrounding its implementation and enforcement.

Article 14 also has considerable relevance to environmental justice because it guarantees equality before the law and equal protection of the laws. Environmental degradation may produce unequal consequences among different sections of society, and arbitrary or discriminatory environmental decision-making may raise constitutional concerns. For example, unequal access to safe drinking water or the concentration of hazardous activities in vulnerable communities may involve issues extending beyond environmental regulation to substantive equality and human dignity. The combined interpretation of Articles 14 and 21 therefore provides a broader constitutional framework through which environmental inequality may be examined. The recognition of the right against the adverse effects of climate change in M.K. Ranjitsinh v. Union of India (2024) has further reinforced this connection between environmental protection, equality, and the right to life.

The constitutional foundation of environmental justice is also supported by Article 47, which identifies the improvement of public health as a primary duty of the State. Environmental pollution is closely connected with public health because contaminated air, unsafe water, and inadequate waste management may create serious health risks. Consequently, environmental governance must be understood as part of the wider constitutional responsibility to protect human well-being. When Articles 14, 21, 47, 48A, and 51A(g) are interpreted harmoniously, they provide a normative foundation for environmental protection based on dignity, equality, public health, and ecological responsibility.

Judicial Interpretation of Article 21 and the Evolution of Environmental Rights

The Indian judiciary has played a central role in developing environmental jurisprudence by expanding the interpretation of Article 21 and recognizing environmental quality as an essential condition of human life. This development reflects the broader transformation of fundamental-rights jurisprudence, under which constitutional protections are interpreted in accordance with changing social circumstances and the requirements of human dignity. The Supreme Court has repeatedly emphasized that the right to life includes more than the protection of physical existence and that environmental degradation may interfere with the enjoyment of fundamental

rights. Judicial intervention has consequently become an important mechanism for addressing industrial pollution, ecological destruction, and failures in environmental governance. However, scholarly analysis cautions that constitutional recognition alone does not fully define the scope of environmental protection or ensure its implementation (Rajamani, 2007b).

One of the earliest and most significant decisions in this area was Subhash Kumar v. State of Bihar, (1991) 1 SCC 598, in which the Supreme Court expressly recognized that the right to life under Article 21 includes the enjoyment of pollution-free water and air. The dispute concerned allegations of industrial pollution affecting the Bokaro River. The Court observed that environmental contamination capable of impairing the quality of human life could provide grounds for invoking constitutional remedies. However, it dismissed the petition after examining the circumstances and determining that the proceedings were substantially motivated by private interests rather than genuine public concern. The judgment is important because it simultaneously recognized environmental quality as a constitutional interest and emphasized that public interest litigation must be pursued for legitimate purposes.

The interpretation of Article 21 was further strengthened in Virender Gaur v. State of Haryana, (1995) 2 SCC 577, where the Supreme Court emphasized the relationship between environmental protection, sanitation, ecological balance, and human dignity. The Court recognized that environmental conditions are integral to the enjoyment of life and that public authorities have responsibilities concerning the maintenance of ecological and hygienic surroundings. The decision contributed to the development of environmental constitutionalism by extending the scope of the right to life beyond individual survival to include the wider environmental circumstances in which human life is sustained.

A major development occurred in Vellore Citizens' Welfare Forum v. Union of India, (1996) 5 SCC 647, which concerned serious environmental pollution caused by the discharge of untreated industrial effluents from tanneries in Tamil Nadu. The Supreme Court examined the conflict between industrial development and environmental protection and emphasized that economic progress could not be pursued without regard to ecological consequences. The Court recognized sustainable development as an important principle of environmental law and accepted the precautionary principle and the polluter pays principle as essential components of the Indian legal framework. The significance of this decision extends beyond the particular industrial dispute because it established that environmental protection requires both preventive regulation and accountability for ecological damage.

The precautionary principle requires public authorities to anticipate and prevent serious environmental harm rather than merely respond after damage has occurred. It is particularly relevant where activities create a risk of significant ecological injury and scientific uncertainty remains concerning the precise extent of potential consequences. The polluter pays principle, on the other hand, imposes responsibility upon those causing pollution to bear appropriate costs associated with environmental restoration and compensation. These principles represent a departure from approaches that treat pollution as an unavoidable consequence of economic activity. They establish that the costs of environmentally harmful development should not automatically be transferred to affected communities or the public. In A.P. Pollution Control Board v. Prof. M.V. Nayudu, (1999) 2 SCC 718, the Supreme Court also examined the

precautionary principle and the importance of scientific expertise in environmental decision-making.

The application of polluter liability was further developed in Indian Council for Enviro-Legal Action v. Union of India, (1996) 3 SCC 212. The case involved extensive pollution arising from industrial activities and raised questions concerning the responsibility of industries for environmental contamination. The Supreme Court reinforced the proposition that entities responsible for ecological damage may be required to bear the costs of remedial measures. The judgment strengthened the remedial dimension of environmental justice by connecting environmental accountability with the restoration of damaged ecological systems. It also highlighted the importance of effective legal mechanisms capable of preventing industries from externalizing environmental costs onto society.

Another important contribution emerged from the environmental litigation associated with M.C. Mehta. In M.C. Mehta v. Union of India, (1987) 1 SCC 395, concerning the Oleum Gas Leak, the Supreme Court developed the principle of absolute liability for enterprises engaged in hazardous or inherently dangerous activities. The decision established a stringent liability framework reflecting the serious risks that hazardous industrial operations may pose to the public. Although the case was not exclusively concerned with the interpretation of environmental justice, it significantly influenced the development of legal responsibility for industrial hazards and the protection of individuals exposed to dangerous activities.

The public trust doctrine received important judicial recognition in M.C. Mehta v. Kamal Nath, (1997) 1 SCC 388. The Supreme Court emphasized that certain natural resources are held by the State in trust for public use and enjoyment. The doctrine restricts the arbitrary diversion or exploitation of such resources where public and ecological interests require their protection. Its constitutional significance lies in the recognition that natural resources are not simply commodities available for unrestricted private appropriation. Rather, they form part of the ecological foundation of society and must be managed consistently with public responsibility and long-term sustainability.

The evolution of environmental jurisprudence demonstrates that the Supreme Court has gradually developed a constitutional framework combining fundamental rights, statutory environmental obligations, and principles of ecological accountability. Nevertheless, judicial recognition of environmental rights should not be confused with automatic or universal judicial intervention in every environmental dispute. Constitutional adjudication remains subject to questions of jurisdiction, evidence, procedural requirements, competing public interests, and the appropriate institutional role of courts. The lasting significance of these judgments lies in their articulation of legal principles through which governmental and industrial conduct may be assessed against constitutional standards.

A further constitutional development occurred in M.K. Ranjitsinh v. Union of India, 2024 INSC 280, decided on 21 March 2024. The proceedings arose in the context of measures for protecting the endangered Great Indian Bustard and the implications of electricity transmission infrastructure connected with renewable energy development. While considering the relationship between biodiversity conservation and climate-related measures, the Supreme

Court expressly recognized the right against the adverse effects of climate change as flowing from Articles 14 and 21 of the Constitution. The judgment acknowledged that climate change may affect the enjoyment of fundamental rights and that its consequences are not experienced uniformly across society. Economically disadvantaged and otherwise vulnerable communities may face disproportionate difficulties in responding to climatic changes, making equality an essential consideration in climate-related constitutional analysis.

The recognition of climate-related rights represents an important stage in the development of Indian environmental jurisprudence. Earlier judicial decisions primarily addressed pollution, industrial hazards, ecological conservation, and resource protection, whereas the emerging climate-rights framework encompasses broader risks to health, livelihood, water security, and human well-being. However, the recognition of such a constitutional right does not by itself resolve the complex questions surrounding its enforcement. The identification of specific governmental duties, the assessment of competing environmental interests, and the determination of appropriate remedies remain matters requiring further doctrinal and institutional development.

Environmental Justice, Sustainable Development and Access to Remedies

The relationship between environmental justice and sustainable development is fundamental to the contemporary understanding of Article 21. Sustainable development recognizes that economic growth, social advancement, and ecological protection must be considered together rather than treated as mutually exclusive objectives. Development policies that generate economic benefits while imposing severe environmental costs upon vulnerable populations may undermine both social justice and constitutional equality. Conversely, environmental regulation must also consider legitimate developmental needs and the potential social consequences of regulatory choices. The central legal challenge is therefore to establish a framework in which development proceeds within acceptable ecological limits while protecting the rights and interests of affected communities. The World Commission on Environment and Development (1987) linked sustainability to the needs of present and future generations, while Shankar and Bindal (2012) examined the judicial tension between environmental protection and development.

Environmental justice adds a distributive dimension to the principle of sustainable development. It requires examination not merely of whether a particular project complies with environmental standards but also of the manner in which its risks and benefits are allocated. Industrial facilities, mining operations, major infrastructure projects, and waste-disposal activities may produce wider economic benefits while exposing nearby populations to environmental hazards. Communities dependent upon agriculture, forests, fisheries, or local water resources may experience particularly serious consequences from ecological degradation. Such circumstances raise questions concerning consultation, compensation, rehabilitation, regulatory accountability, and the fairness of environmental decision-making.

The principle of intergenerational equity further reinforces the constitutional significance of environmental protection. It recognizes that natural resources and ecological systems must be managed with due regard to the interests of future generations. Environmental destruction may

produce consequences that extend far beyond the immediate period of economic activity, particularly where biodiversity loss, groundwater depletion, soil degradation, or long-term contamination is involved. The protection of future generations is therefore closely connected with sustainable development and the public trust doctrine. Although future generations cannot ordinarily participate directly in present legal and administrative proceedings, their interests remain relevant to the constitutional and statutory evaluation of environmental decisions.

International environmental developments have also influenced the evolution of environmental justice. The Stockholm Declaration of 1972 recognized the relationship between human well-being and environmental conditions, while the Rio Declaration of 1992 emphasized sustainable development, public participation, and preventive environmental action. The Paris Agreement of 2015 further strengthened international cooperation on climate change. More recently, United Nations General Assembly Resolution 76/300 of 2022 recognized the human right to a clean, healthy, and sustainable environment. These instruments differ in their legal character and enforceability; however, they collectively reflect the increasing recognition of environmental protection as a matter of human rights and shared responsibility.

Within India, the environmental statutory framework provides important mechanisms for giving practical effect to constitutional principles. The Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, and the Environment (Protection) Act, 1986, establish regulatory frameworks concerning pollution prevention and environmental management. The National Green Tribunal Act, 2010, created a specialized adjudicatory institution for specified environmental disputes and related relief. Section 20 of the Act expressly requires the Tribunal to apply the principles of sustainable development, precaution, and polluter pays while passing orders, decisions, or awards. This statutory recognition demonstrates the incorporation of important judicially developed environmental principles into the institutional structure of environmental adjudication.

Access to justice remains central to the effective realization of environmental rights. Articles 32 and 226 of the Constitution provide mechanisms for the enforcement of fundamental rights and judicial review, while the National Green Tribunal offers a specialized statutory forum for matters falling within its jurisdiction. Public interest litigation has historically facilitated environmental claims involving collective interests and affected communities. Nevertheless, the practical accessibility of legal remedies may be restricted by procedural complexity, litigation costs, limited awareness, and difficulties in obtaining technical evidence. Environmental harm often involves scientific questions concerning causation, exposure, cumulative impact, and ecological restoration, making expert evidence and transparent monitoring essential to effective adjudication. Rajamani (2007a) has questioned whether public interest environmental litigation consistently secures participation, equity, and durable outcomes. Shrotria (2015) has examined the National Green Tribunal's contribution to access to environmental justice.

The effectiveness of environmental justice ultimately depends upon the coordination of constitutional safeguards with administrative enforcement. Judicial decisions may articulate binding legal standards, but their implementation requires functioning regulatory institutions, adequate environmental data, and mechanisms for monitoring compliance. Where

environmental authorities fail to enforce statutory requirements consistently, the protection guaranteed through constitutional interpretation may remain largely theoretical. This creates a significant gap between the recognition of environmental rights and their practical enjoyment, particularly for communities with limited access to institutional resources.

Critical Analysis and Contemporary Challenges

The constitutional recognition of environmental protection under Article 21 represents an important achievement, yet the practical realization of environmental justice remains subject to substantial difficulties. One major concern is the unequal distribution of environmental risks. Communities living near industrial facilities, polluted water bodies, waste-disposal sites, or environmentally hazardous locations may experience adverse conditions without possessing adequate resources to relocate or obtain timely remedies. Similarly, environmental degradation affecting agricultural land, forests, and water resources may threaten the economic security of populations whose livelihoods depend directly upon natural systems. The existence of these inequalities demonstrates that environmental protection cannot be evaluated exclusively through aggregate regulatory outcomes; it must also consider the distribution of environmental harm.

A further challenge concerns the relationship between economic development and environmental regulation. Industrialization, urban infrastructure, renewable energy expansion, and resource extraction may serve legitimate public objectives, but they can also produce environmental and social consequences. The determination of acceptable environmental impacts frequently requires balancing competing constitutional interests and evaluating scientific evidence. Courts must therefore exercise care in distinguishing between development that is environmentally manageable and activity that creates unacceptable or unlawful ecological risks. Environmental justice does not necessarily require the rejection of developmental projects; rather, it requires transparent assessment, meaningful participation, proportionate safeguards, and accountability for resulting harm.

The emerging recognition of climate change as a constitutional concern introduces additional complexity. Climate-related damage differs from many conventional pollution disputes because it may involve multiple contributing actors, long-term consequences, and geographically dispersed impacts. Establishing responsibility for specific adverse effects can therefore raise difficult questions of causation, institutional competence, and appropriate remedies. At the same time, climate change may disproportionately affect individuals who have contributed relatively little to greenhouse gas emissions and who possess limited capacity to adapt. This unequal distribution of vulnerability reinforces the relevance of Article 14 and supports an understanding of environmental justice that extends beyond localized pollution to broader questions of climate resilience and social protection.

Another significant issue concerns the extent to which judicial activism can substitute for effective environmental administration. Courts have played an important role in protecting environmental rights, but judicial proceedings are generally initiated after disputes have arisen or harmful conditions have become apparent. Preventive environmental governance requires systematic monitoring, scientific assessment, timely administrative intervention, and

continuous compliance mechanisms. Excessive dependence upon litigation may also result in fragmented responses rather than comprehensive environmental planning. Accordingly, environmental constitutionalism should be supported by effective regulatory institutions rather than relying exclusively upon judicial intervention. Rajamani (2007b) identifies difficulties in defining and implementing constitutional environmental rights, while Verma (2019) draws attention to public attitudes alongside formal environmental institutions.

Public participation is equally important to environmental justice. Decisions concerning land use, industrial activity, infrastructure development, and natural resource management may have direct consequences for affected communities. Where consultation is inadequate or relevant information remains inaccessible, environmental decision-making may fail to account for local conditions and legitimate concerns. Greater transparency in environmental impact assessment, improved public access to monitoring data, and accessible grievance-redressal procedures can strengthen both procedural fairness and institutional accountability. These measures are especially important for communities experiencing barriers arising from poverty, limited legal awareness, or geographical isolation. Dilay, Diduck, and Patel (2020) analyse the relationship between environmental impact assessment, community engagement, and public interest litigation. In Hanuman Laxman Aroskar v. Union of India, (2019) 15 SCC 401, the Supreme Court examined deficiencies in environmental appraisal and public consultation.

From a constitutional perspective, the principal limitation is not the absence of judicial recognition but the difficulty of translating established environmental principles into consistent institutional practice. The expansion of Article 21 has created a strong normative foundation for environmental protection, yet the actual enjoyment of environmental rights depends on measurable improvements in pollution control, safe resource access, ecological restoration, and public health safeguards. The constitutional promise of environmental justice therefore requires an approach that integrates rights-based adjudication with preventive governance, scientific regulation, equitable public policy, and effective enforcement. These considerations suggest that constitutional recognition, meaningful participation, and administrative enforcement should be assessed together rather than treated as substitutes for one another.

Conclusion

The development of environmental justice under Article 21 of the Indian Constitution reflects a significant transformation in the understanding of fundamental rights and constitutional governance. Through progressive judicial interpretation, the Supreme Court has established that the right to life encompasses environmental conditions necessary for human dignity, health, and well-being. Landmark judgments such as Subhash Kumar v. State of Bihar, Virender Gaur v. State of Haryana, Vellore Citizens' Welfare Forum v. Union of India, and M.C. Mehta v. Kamal Nath have strengthened the legal foundations of environmental protection by connecting ecological preservation with constitutional rights and public responsibility. These developments have also facilitated the incorporation of principles such as sustainable development, precaution, polluter pays, and public trust into Indian environmental jurisprudence.

The recognition of the right against the adverse effects of climate change in M.K. Ranjitsinh v. Union of India further demonstrates the evolving relationship between environmental protection, equality, and the right to life. It establishes an important foundation for examining climate-related vulnerabilities within the constitutional framework of Articles 14 and 21. Nevertheless, the existence of constitutional rights and judicial principles does not automatically ensure environmental justice. Institutional limitations, unequal environmental exposure, inadequate public participation, and difficulties in enforcement continue to affect the practical realization of environmental guarantees. The effectiveness of environmental constitutionalism must therefore be assessed not only by the development of legal doctrine but also by its capacity to prevent environmental harm and secure meaningful remedies.

Environmental justice ultimately requires a shift from a predominantly reactive approach toward preventive, equitable, and accountable environmental governance. The State must ensure that environmental policies and development decisions are consistent with constitutional values, scientific standards, and the legitimate interests of present and future generations. The right to a clean environment under Article 21 should consequently be understood as an essential component of substantive equality and human dignity. Its meaningful implementation is indispensable for reconciling environmental sustainability with the constitutional commitment to justice and the protection of human life.

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