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Forests on Trial: The False Promise of Development

Anshaj Srivastava^a Sanskriti Jaiswal^b

^aUniversity of Lucknow, Lucknow, India ^bUniversity of Lucknow, Lucknow, India

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This paper examines the constitutional and legal dimensions of illegal deforestation in India, with particular reference to the Supreme Court's recent intervention in In Re: Kancha Gachibowli Forest, State of Telangana.¹ The case is situated within a wider national trend of forest clearances carried out in the name of development, often at the cost of biodiversity and ecological stability. Drawing on judicial precedents such as T N Godavarman Thirumulpad v Union of India² and M C Mehta v Union of India,³ the analysis highlights how courts have repeatedly affirmed the protection of forests under Article 21 of the Constitution.⁴ At the same time, it underscores persistent governance failures: weak enforcement of the Forest Conservation Act 1980, post-facto clearances, and the limited deterrent effect of National Green Tribunal interventions.⁵ While the judiciary has acted as a constitutional safeguard, its effectiveness is undermined by administrative inertia and political expediency. The paper argues that framing environmental protection as conflicting with development is a false dichotomy, and calls for policy models that recognise forests as constitutional assets, essential both for ecological balance and the realisation of sustainable development.

Keywords: *illegal deforestation, judicial intervention, forest conservation, sustainable development.*

¹ In Re: Kancha Gachibowli Forest, State of Telangana v (2025) Suo Moto WP (C) Nos 03/2025

² T.N. Godavarman Thirumulpad v Union of India (1997) 2 SCC 267

³ M C Mehta v Union of India (1987) 1 SCC 395

⁴ Subhash Kumar v State of Bihar (1991) 1 SCC 598

⁵ Ashok Kumar Sharma IFS (Retd) & Ors v Union of India & Ors (2024) LiveLaw (SC) 170; M K Ranjitsinh v Union of India (2024) SCC OnLine SC 570

INTRODUCTION

When the Supreme Court of India tells a state's top bureaucrat to "restore the forest or go to jail," it's more than a headline; it's a signal that the judiciary is unwilling to watch silent forests turn into silent witnesses of lawlessness. The recent Kancha Gachibowli deforestation in Hyderabad, where over 100 acres of dense forest were razed in a matter of hours, is not just an environmental tragedy; it's a legal and ethical indictment. Behind the roar of bulldozers and the rush to 'develop' lies a pressing question: Can the rule of law withstand the lure of rapid urbanisation?

BACKGROUND

On the festivals of Ugadi and Gudi Padwa in March 2025, the Telangana Government cleared over 100 acres of forest in Kancha Gachibowli, Hyderabad, home to eight scheduled wildlife species⁶, felling more than 400 trees overnight. The area, near the University of Hyderabad, supports dense native vegetation, migratory birds, and fragile Deccan Plateau soil. This sudden clearance, carried out without securing proper environmental permissions, sparked protests from students and activists, who warned of displaced wildlife and irreversible ecological damage.

On April 3, 2025, two writ petitions by the *Vata Foundation* and *Kalapala Babu Rao*⁷ prompted the Telangana High Court to halt all development. On that very day, the Supreme Court initiated suo motu proceedings, ordering an immediate inspection. The Court found that over 1,500 trees had been felled illegally, with more than 60% of the 400-acre site classified as medium to dense forest.

Relying on the Van (Sanrakshan Evam Samvardhan) Rules, 2023⁸, and its directions in *Ashok Kumar Sharma v Union of India*⁹, the Court ordered an afforestation plan to be implemented within weeks. It warned senior officials of imprisonment for non-compliance. *In Re: Kancha*

⁶ *In Re: Kancha Gachibowli Forest, State of Telangana v* (2025) Suo Moto WP (C) Nos 03/2025

⁷ Manasi Chaudhari, 'Judicial Activism and Environmental Protection : Supreme Court's Suo Motu Action against Deforestation in Hyderabad' *SCC OnLine* (17 April 2025)

<<https://www.sconline.com/blog/post/2025/04/17/judicial-activism-and-environmental-protection-supreme-courts-suo-motu-action-against-deforestation-in-hyderabad/>> accessed 05 August 2025

⁸ Van (Sanrakshan Evam Samvardhan) Rules 2023

⁹ *Ashok Kumar Sharma & Ors v Union of India & Anr* (2023) WP (C) No 1164/2023

*Gachibowli Forest, State of Telangana*¹⁰, the Supreme Court delivered a rare and decisive victory for environmental protection, halting commercial exploitation, ordering restoration, and demonstrating the impact of timely judicial intervention. Yet, this was only one case to reach the spotlight; many others remain hidden under the shadow of “development,” with forests disappearing quietly and irreversibly.

THE NATIONAL PATTERN: SCALE OF FOREST LOSS

The Kancha Gachibowli case is not an isolated environmental violation; it is part of a nationwide pattern where authorities, often under the guise of “holistic development,” preside over or enable large-scale forest clearances.

Data from Global Forest Watch indicates that, between 2002 and 2023, India witnessed a loss of approximately 414,000 hectares of humid primary forest, representing 4.1 per cent of the nation’s total forest cover and constituting 18 per cent of the overall tree cover loss recorded during this period.¹¹ In the same period, the country experienced a loss of 2.33 million hectares of tree cover, which is equivalent to a 6 per cent decline in its total tree cover, releasing 1.12 gigatonnes of CO₂ equivalent into the atmosphere.¹² This is not the result of natural processes alone; much of it stems from deliberate clearances sanctioned in the name of urban expansion, industrial projects, and infrastructure corridors.

Between 2001 and 2022, tree cover loss in India resulted in annual emissions of approximately 51 million tonnes of CO₂ equivalent, while removing 141 million tonnes per year, a reminder that each clearance irreversibly weakens the country’s carbon sink capacity. Since 2013, an alarming 95 per cent of all tree cover loss has occurred within *natural forests*, the very areas that should be most strictly protected under environmental laws.¹³

The damage is not evenly spread. Notably, five states—Assam, Mizoram, Arunachal Pradesh, Nagaland, and Manipur together accounted for 60 per cent of the total tree cover loss recorded

¹⁰ *In Re: Kancha Gachibowli Forest, State of Telangana v* (2025) Suo Moto WP (C) Nos 03/2025

¹¹ ‘India’ (Global Forest Watch) <<https://www.globalforestwatch.org/dashboards/country/IND/>> accessed 05 August 2025

¹² ‘India lost 2 million hectares of tree cover since 2000: Global Forest Watch’ *The Indian Express* (13 April 2024) <<https://indianexpress.com/article/india/india-lost-2-million-hectares-of-tree-cover-since-2000-global-forest-watch-9266750/>> accessed 05 August 2025

¹³ *Ibid*

in India between 2001 and 2023. Assam alone lost 324,000 hectares, while Mizoram followed closely with 312,000 hectares.¹⁴ Many of these losses are tied to “development” projects fast-tracked with questionable environmental impact assessments or opaque clearance processes. The trend is accelerating. In 2017, India witnessed its highest annual tree cover loss at 189,000 hectares, followed by 175,000 hectares in 2016 and 144,000 hectares in 2023, the highest in the last six years.¹⁵ These peaks often coincide with periods of aggressive project approvals, where environmental safeguards are weakened or bypassed to expedite construction and commercial exploitation.

PROGRESS AT NATURE’S EXPENSE

The figures are more than just environmental data points; they map a disturbing pattern. The responsibility for these losses does not rest on chance or nature; it rests squarely on the shoulders of authorities who sanction, enable, or turn a blind eye to illegal deforestation. Across India, ecologically sensitive zones are routinely cleared under the pretext of “holistic development” or “nation-building” projects. Large-scale infrastructure, industrial corridors, and real estate ventures are often fast-tracked with questionable environmental impact assessments, while public consultations are perfunctory or absent. This pattern is visible in the *Corbett Tiger Reserve*, where thousands of trees were felled and illegal constructions were allegedly carried out with the complicity of forest officials¹⁶; in the *Aravalli Hills*, where a private university built a campus on protected land only to have its penalty reduced later¹⁷; and in Karnataka’s *Bellary district*, where a mining giant occupied nearly 97 hectares of reserved forest for decades before seeking post-facto clearance.¹⁸ Even in biodiversity hotspots like Lavasa in the Western Ghats, projects have advanced despite blatant environmental violations.¹⁹ Together, these cases reveal

¹⁴ ‘India Lost 2.33 Million Hectares Of Tree Cover Since 2000: Global Forest Watch’ *NDTV* (12 April 2024) <<https://www.ndtv.com/india-news/india-lost-2-33-million-hectares-of-tree-cover-since-2000-global-forest-watch-5428639>> accessed 05 August 2025

¹⁵ *Ibid*

¹⁶ Ishita Mishra, ‘Over 6,000 trees illegally cut for tiger safari project in Corbett Reserve, says FSI report’ *The Hindu* (02 October 2022) <<https://www.thehindu.com/news/national/over-6000-trees-illegally-cut-against-163-for-pakhru-tiger-safari-in-corbett-says-report/article65959687.ece>> accessed 05 August 2025

¹⁷ Ipsita Pati, ‘Penalty burden eases on private university that built campus illegally in Aravalis’ *The Times of India* (15 July 2025) <<https://timesofindia.indiatimes.com/city/gurgaon/penalty-burden-eases-on-private-university-that-built-campus-illegally-in-aravalis/articleshow/122460616.cms>> accessed 05 August 2025

¹⁸ Krishnadas Rajagopal, ‘SC orders inspection of six mines near Bellary forests’ *The Indian Express* (20 November 2010) <<https://indianexpress.com/article/news-archive/web/sc-orders-inspection-of-six-mines-near-bellary-forests/>> accessed 05 August 2025

¹⁹ Arnab Pratim Dutta and Kumar Sambhav Shrivastava, ‘Lavasa exposed’ (*Down To Earth*, 05 January 2012) <<https://www.downtoearth.org.in/environment/lavasa-exposed-33282>> accessed 05 August 2025

how the language of progress conceals a systematic dismantling of environmental safeguards, raising the question: if the law is so clear, why does it so often fail the very forests it is meant to protect?

ENFORCEMENT CHALLENGES: SYSTEMIC FAILURES IN FOREST PROTECTION

India's forest governance system is riddled with contradictions and structural weaknesses, leaving it ill-equipped to prevent illegal deforestation. While laws such as the *Forest Conservation Act, 1980*²⁰, and the *Wildlife Protection Act, 1972*²¹, aim to halt biodiversity loss, implementation gaps undermine their effectiveness.

Legal Framework Weaknesses: India's forest governance system is riddled with contradictions and structural weaknesses, making it ill-equipped to prevent deforestation carried out in the name of development. Laws such as the Forest Conservation Act 1980²² and the Wildlife Protection Act 1972²³ were enacted to halt biodiversity loss, but legislative changes and certain judicial interventions have centralised control, sidelined forest-dependent communities, and enabled bureaucratic overreach.²⁴ Enforcement agencies often lack political independence, applying laws selectively. Strict for low-profile offenders but lax when projects carry political or commercial weight. Post-facto approvals for illegal mining, construction, or infrastructure projects have become routine, legitimising unlawful clearances.²⁵

The governance structure is highly centralised, with overlapping mandates between the Forest Department, Ministry of Environment, Forest and Climate Change (MoEFCC), National Green Tribunal (NGT), and State Pollution Control Boards, creating delays, jurisdictional loopholes, and weak long-term enforcement. Laws rarely integrate local ecological knowledge, while Environmental Impact Assessments are frequently outsourced to consultants with conflicts of interest, producing reports favouring developers.²⁶ Monitoring after clearance is minimal, leaving compliance largely voluntary. Token fines, short imprisonment terms, and low-cost compensatory afforestation orders are often outweighed by the profits from exploiting forest

²⁰ Forest Conservation Act 1980

²¹ Wildlife Protection Act 1972

²² Forest Conservation Act 1980

²³ Wildlife Protection Act 1972

²⁴ *T.N. Godavarman Thirumulpad v Union of India* (1997) 2 SCC 267

²⁵ *Ibid*

²⁶ *Centre for Environmental Law, World Wide Fund-India v Union of India and Ors* (2013) 8 SCC 234

land, creating perverse incentives where breaking the law is cheaper and faster than following it.²⁷

Administrative Inertia and Enforcement Loopholes in Illegal Deforestation: Despite clear legal frameworks mandating forest protection, illegal tree felling and encroachment continue unabated, largely due to systemic administrative lapses and weak enforcement. Forest departments often fail to act on reported violations. In Gurgaon, repeated complaints about illegal constructions in the Aravalis went unaddressed,²⁸ while in Nagpur, over 210 notices were issued to various departments for failing to replant trees removed for development.²⁹ Even in eco-sensitive zones such as Corbett³⁰ and Mohali,³¹ officials authorised construction and tree felling that caused irreversible ecological harm, often violating environmental norms and NGT directives.

Penalties for violations are typically minor and rarely act as a deterrent. Notices may be issued, but follow-up actions such as replanting, habitat restoration, or demolition of illegal structures are minimal or absent, allowing violations to persist. Multiple agencies, including forest departments, urban bodies, and highway authorities, often work in silos, creating enforcement gaps that violators exploit. Investigations and punitive measures are frequently delayed, and compliance with compensatory afforestation or post-clearance conditions is rarely verified, making adherence largely voluntary.³²

²⁷ Soumitra Ghosh, 'Compensatory Afforestation: 'Compensating' Loss of Forests or Disguising Forest Offsets?' (2017) 52(38) Economic and Political Weekly 67 <<https://www.jstor.org/stable/26697755>> accessed 05 August 2025

²⁸ Ipsita Pati, 'Illegal construction still on in Aravalis, trees cut & walls built' *The Times of India* (12 May 2025) <https://timesofindia.indiatimes.com/city/gurgaon/illegal-construction-still-on-in-aravalis-trees-cut-walls-built/articleshow/121085965.cms?utm_source=contentofinterest&utm_medium=text&utm_campaign=cppst> accessed 05 August 2025

²⁹ 'Govt Departments Felled Trees, Forgot to Replant: NMC Issues 210 Notices' *The Times of India* (22 May 2025) <<https://timesofindia.indiatimes.com/city/nagpur/govt-departments-felled-trees-forgot-to-replant-nmc-issues-210-notices/articleshow/121324301.cms>> accessed 05 August 2025

³⁰ Krishnadas Rajagopal, 'Trees in Corbett fell prey to greedy nexus, says Supreme Court' *The Hindu* (07 March 2024) <<https://www.thehindu.com/sci-tech/energy-and-environment/jim-corbett-illegal-construction-supreme-court-raps-former-uttarakhand-forest-minister/article67919941.ece#:~:text=The%20Supreme%20Court%20on%20Wednesday%20condemned%20the%20illegal,to%20ransack%20the%20environment%20for%20short-term%20commercial%20ends.>>> accessed 05 August 2025

³¹ Barinderjit Saluja, '1,855 trees cut without permission in Mohali: DFO to NGT' *The Times of India* (04 August 2025) <<https://timesofindia.indiatimes.com/city/chandigarh/1855-trees-cut-without-permission-in-mohali-dfo-to-ngt/articleshowprint/123080788.cms>> accessed 05 August 2025

³² Ghosh (n 27)

A review of recent incidents nationwide reveals a troubling pattern: administrative inertia, weak penalties, delayed action, and occasional official complicity continue to drive illegal deforestation. Until these systemic weaknesses are addressed, India's forest laws will remain vulnerable, and the promise of sustainable development and meaningful conservation will remain largely unfulfilled. Even the powers vested in the National Green Tribunal (NGT), by the grace of lawmakers, often prove insufficient to ensure effective compliance.³³

NGT: Potential Undermined by Systemic Constraints: The National Green Tribunal (NGT) was established to deliver swift and effective environmental justice, but in practice, it often struggles to curb large-scale illegal deforestation. Across India, high-profile cases highlight both its potential and limitations.

In Dehradun, nearly 19,000 trees were cut, and another 51,000 were slated for removal for infrastructure projects, with the NGT intervening only after significant damage had occurred.³⁴ Similarly, the removal of 6,000 trees from an ecologically sensitive area in the course of the Dharali flood disaster showed how environmental harm can escalate before judicial intervention.³⁵

In urban areas like Delhi's Vasant Vihar, 31 tree violations were documented since 2021–22, yet enforcement remains slow.³⁶ Infrastructure projects continue despite NGT directives. In Bhopal, 8,000–12,000 trees were approved for removal for road widening even after notices to the NHAI, showing that guidelines are often ignored or only partially implemented.³⁷ In Rajasthan, the NGT issued notices to state officials over concerns that a sports complex in Kota Zoo could

³³ *Ibid*

³⁴ 'Dehra doomed: Nearly 19k trees cut, 51k more face the axe for infra projects' *The Times of India* (04 June 2025) <<https://timesofindia.indiatimes.com/city/dehradun/dehra-doomed-nearly-19k-trees-cut-51k-more-face-the-axe-for-infra-projects/articleshow/121629790.cms>> accessed 05 August 2025

³⁵ 'Dharali flood rekindles concerns over felling of 6k trees in eco zone' *The Times of India* (07 August 2025) <<https://timesofindia.indiatimes.com/city/dehradun/dharali-flood-rekindles-concerns-over-felling-of-6k-trees-in-eco-zone/articleshow/123166879.cms>> accessed 07 August 2025

³⁶ 'Forest dept: 31 tree violations in Vasant Vihar since 2021-22' *The Times of India* (29 May 2025) <<https://timesofindia.indiatimes.com/city/delhi/forest-dept-31-tree-violations-in-vasant-vihar-since-2021-22/articleshow/121472195.cms>> accessed 05 August 2025

³⁷ '8k-12k trees to be felled for road broadening in disregard of NGT rules': Notices issued to NHAI' *The Times of India* (09 August 2025) <<https://timesofindia.indiatimes.com/city/bhopal/8k-12k-trees-to-be-felled-for-road-broadening-in-disregard-of-ngt-rules-notices-issued-to-nhai/articleshow/123195505.cms>> accessed 09 August 2025

endanger century-old trees, but the case remains stalled at the notice stage, highlighting delays that blunt the Tribunal's impact.³⁸

Even major national projects, such as the Char Dham highway development in Uttarakhand,³⁹ reflect a recurring pattern: environmental safeguards are acknowledged on paper, yet enforcement lags, and ecological damage accumulates before meaningful action is taken. Procedural delays, limited follow-up, and slow compliance by government agencies and private developers reduce the Tribunal's effectiveness.

The cumulative effect is that the NGT's directives often act more as warnings than enforceable protections, leaving India's forests exposed to ongoing harm and casting doubt on the real-world applicability of "sustainable development" in environmental governance.

PRECEDENTS AND PATTERNS: HOW COURTS HAVE SHAPED FOREST LAW?

Judicial precedents have been instrumental in the evolution of forest governance in India, providing both guidance and enforcement mechanisms where administrative frameworks often fall short. Among the most influential is the case of *T.N. Godavarman Thirumulpad v Union of India* (1996),⁴⁰ which remains a landmark in forest jurisprudence. The Supreme Court recognised the fragility of India's forest ecosystems and mandated strict oversight of forest reserves, prohibiting commercial logging or clearances without express legal approval. This case established a precedent for judicial activism in environmental protection and underscored the judiciary's role as a guardian of ecological balance.

Another significant precedent is *M.C. Mehta v Union of India*⁴¹, initially focused on river pollution but with far-reaching environmental implications. The Court introduced the principle of *polluter pays*, later extended to forest violations, emphasising that environmental degradation carries legal and financial consequences. Similarly, *Ashok Kumar Sharma v Union*

³⁸ 'NGT issues notices to Raj govt on tree felling at Kota zoo' *The Times of India* (29 May 2025) <<https://timesofindia.indiatimes.com/city/jaipur/ngt-issues-notices-to-raj-govt-on-tree-felling-at-kota-zoo/articleshow/121473906.cms>> accessed 05 August 2025

³⁹ Sunil Prasad, 'Char Dham Project: Is development equal to disaster?' (*Down to Earth*, 16 February 2021) <<https://www.downtoearth.org.in/environment/char-dham-project-is-development-equal-to-disaster--75562>> accessed 05 August 2025

⁴⁰ *T.N. Godavarman Thirumulpad v Union of India* (1997) 2 SCC 267

⁴¹ *M.C. Mehta v Union of India* (1987) 4 SCC 463

of *India*⁴² reinforced judicial authority in forest restoration, directing afforestation and the implementation of corrective measures when illegal tree felling occurs. This judgment directly informed the Supreme Court's intervention in the Kancha Gachibowli deforestation case, demonstrating continuity in legal reasoning and enforcement.

High Courts have also contributed meaningfully. In the *Kancha Gachibowli case*, the Telangana High Court's immediate halting of unauthorised clearing illustrated the judiciary's capacity to act decisively at a regional level. In addition, orders from the National Green Tribunal, such as in the Dharali flood disaster⁴³ and the Kota Zoo⁴⁴ sports complex cases, show the Tribunal's growing, though sometimes limited, role in enforcing environmental norms.

Collectively, these precedents reinforce key principles: forest protection is part of the public trust doctrine, post-facto approvals do not absolve legal responsibility, and afforestation or restoration is mandatory. They illustrate how judicial intervention can bridge the gap between policy, administrative inaction, and ecological imperatives, providing a framework for sustainable forest governance.

SUSTAINABILITY V DEVELOPMENT: THE FALSE DICHOTOMY

The framing of environmental protection versus economic development as an either-or choice has become one of the most destructive myths in contemporary policy discourse. The Kancha Gachibowli case exemplifies how this false dichotomy enables ecological destruction while masquerading as progress. India has committed to achieving net zero emissions by 2070 and establishing an additional carbon sink of 2.5–3 billion tonnes of CO₂ equivalent by means of enhanced forest cover, yet continues approving large-scale forest clearances under the banner of development.⁴⁵

As of 2021, forest and tree cover accounts for only 24.6% of India's geographical area, falling short of the National Forest Policy target of 33%, a glaring gap that illustrates how sustainability is often reduced to symbolic gestures. Compensatory afforestation in remote locations is

⁴² *Ashok Kumar Sharma & Ors v Union of India & Anr* (2023) WP (C) No 1164/2023

⁴³ Dharali flood rekindles concerns over felling of 6k trees in eco zone (n 35)

⁴⁴ NGT issues notices to Raj govt on tree felling at Kota zoo (n 38)

⁴⁵ 'Legal Reforms or Legal Gaps? India's Struggle with Sustainability' *Bharat Law* (04 May 2025)

<[Legal Reforms or Legal Gaps? India's Struggle with Sustainability](#)> accessed 05 August 2025

presented as an equal substitute for old-growth ecosystems, while token ecological measures are masqueraded as sufficient mitigation for irreversible damage. Legal reforms, rather than providing forward-thinking protection, often respond reactively to crises and are, in many cases, diluted or bypassed through loopholes and exemptions favouring project clearances.

Nearly one to one and a half billion people around the world depend, directly or indirectly, on forests for their lives and livelihoods. When forests remain healthy, the ripple effects extend far beyond the trees themselves, supporting communities, economies, and the social fabric that sustains development. Yet India's development model rests on a fundamental economic fallacy: that short-term profits from land conversion outweigh long-term costs of environmental degradation. Forest ecosystems provide critical services, such as carbon sequestration, flood control, soil conservation, and biodiversity preservation, that, when quantified, far exceed the value derived from their destruction.

Chhattisgarh has become the first state in India to link its forest ecosystem to Green GDP, highlighting the economic and environmental value of forests for biodiversity conservation and climate change mitigation. This innovative approach demonstrates that genuine sustainability transcends the artificial choice between development and environmental protection, creating economic models that enhance rather than destroy natural ecosystems. Recent amendments to the Forest Act emphasise maintaining forest carbon stocks through ecologically balanced sustainable development to achieve national Net Zero targets, signalling a shift toward recognising forests as essential infrastructure rather than obstacles to progress.⁴⁶

CONCLUSION

The Kancha Gachibowli deforestation case is a reminder that India's environmental governance is often strongest in the courtroom and weakest in the field. By warning senior officials to either restore the forest or face imprisonment, the Supreme Court reaffirmed that forests are not expendable tracts of land but constitutional assets, protected under the spirit of Article 21 and the directive principles in Articles 48A and 51A(g). The judiciary's words echo a larger truth that the survival of forests is inseparable from the survival of justice itself.

⁴⁶ *Ibid*

The Court has long recognised, beginning with *Subhash Kumar v State of Bihar* (1991)⁴⁷, “the right to life under Article 21⁴⁸ includes the right to live in a clean and non-hazardous environment.” In *T.N. Godavarman*⁴⁹, which laid the foundation for continuing judicial oversight, *The M.K. Ranjitsinh v Union of India* (2024)⁵⁰, where biodiversity was placed above unchecked development, the message has been consistent: environmental protection is not charity, nor an administrative afterthought, but a constitutional mandate. Yet, despite these precedents, the silence of enforcement agencies, the ease of post-facto clearances, and the lure of rapid urbanisation continue to erode the ecological wealth of the nation.

Judicial pronouncements can light the path, but they cannot walk it. For forests to truly be preserved, governance must move beyond token compliance and embrace sustainability as the cornerstone of development. The law has drawn the boundaries, but its strength lies only in how faithfully they are observed.

This brings us to a larger reflection: will India’s future development narrative integrate the protection of forests as a non-negotiable foundation of progress, or will we continue to balance compliance against convenience until there is nothing left to protect?

⁴⁷ *Subhash Kumar v State of Bihar* (1991) 1 SCC 598

⁴⁸ Constitution of India 1950, art 21

⁴⁹ *T.N. Godavarman Thirumulpad v Union of India* (1997) 2 SCC 267

⁵⁰ *M K Ranjitsinh v Union of India* (2024) SCC OnLine SC 570