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Prasanna S,

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No. 08, Arul Nagar, Seera Thoppu,

Maudhanda Kurichi, Srirangam,

Tiruchirappalli – 620102

Phone : +91 94896 71437 – [info@iledu.in](mailto:info@iledu.in) / [Chairman@iledu.in](mailto:Chairman@iledu.in)



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## WILDLIFE CONSERVATION AND PUBLIC INTEREST LITIGATION IN INDIA: A LEGAL TOOL FOR ENVIRONMENTAL PROTECTION

**AUTHOR** – CHANDRANI CHAKRABORTY, STUDENT AT DEPARTMENT OF LEGAL STUDIES, MOTHERHOOD UNIVERSITY, ROORKEE, UTTARAKHAND

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### Abstract

India, one of the world's most biodiverse countries, faces critical challenges in conserving its wildlife amidst rapid urbanization, habitat destruction, and human-animal conflicts. Despite the existence of a comprehensive statutory framework, implementation gaps and administrative apathy often hinder effective conservation. Public Interest Litigation (PIL), a unique facet of Indian constitutional jurisprudence, has emerged as a proactive legal mechanism for addressing environmental degradation and safeguarding wildlife. This paper examines the intersection of wildlife conservation and PIL in India, analyzing the statutory frameworks, judicial interventions, landmark cases, and the broader implications of using PIL as an instrument for ecological justice.

Wildlife conservation in India has witnessed significant legal and judicial interventions, especially through the medium of Public Interest Action (PIL), which has come an necessary tool for environmental advocacy. Feting the natural value of wildlife and its pivotal part in maintaining ecological balance, the Indian bar has laboriously responded to the environmental extremity by expanding the compass of abecedarian rights under Composition 21 of the Constitution to include the right to a healthy terrain. This paper critically examines how PIL has evolved as a legal instrument to address the pitfalls to wildlife posed by deforestation, niche destruction, coddling, and limited development conditioning.

The study begins by tracing the literal development of environmental justice in India, fastening on the indigenous and legislative frame that supports wildlife protection, including the Wildlife (Protection) Act, 1972, the Environment (Protection) Act, 1986, and applicable indigenous vittles similar as Articles 48A and 51A (g). Through a doctrinal analysis of corner PIL cases similar as T.N. Godavarman

Thirumulpad v. Union of India, Centre for Environmental Law, WWF- India v. Union of India, and others, the paper explores how courts have issued innovative remedies – ranging from the creation of special authorities and panels to the suspense of artificial systems thereby buttressing conservation sweats.

likewise, the paper evaluates the effectiveness and limitations of PIL as a strategy for wildlife conservation. While judicial activism has frequently filled policy and enforcement gaps left by administrative inactivity, it also raises enterprises about the boundaries of judicial intervention, the practicality of perpetration, and the need for institutional collaboration. The part of civil society, environmental NGOs, and concerned citizens in initiating PILs reflects the democratization of environmental governance, yet challenges remain in icing that similar interventions are grounded on sound wisdom and are free from vested interests.

In conclusion, the paper argues that PIL has significantly contributed to wildlife conservation in India by promoting legal responsibility, public participation, and environmental mindfulness.

still, to sustain and enhance these earnings, it's imperative to strengthen institutional mechanisms, promote inter-agency collaboration, and encourage a holistic approach to environmental governance that aligns judicial action with legislative intent and executive capacity.

### 1. Introduction

Wildlife is integral to the ecological balance, cultural heritage, and economic prosperity of a nation. India, with its diverse ecosystems ranging from the Himalayas to the Western Ghats, is home to over 91,000 species of animals and 45,000 species of plants. However, this rich biodiversity is increasingly under threat due to poaching, deforestation, pollution, and human encroachments.

In this context, **Public Interest Litigation (PIL)** has emerged as a critical legal tool to enforce wildlife protection laws, promote sustainable development, and compel administrative accountability. Through PILs, citizens, NGOs, and legal activists have been able to approach the judiciary to seek redress for environmental harms affecting the public at large and voiceless entities such as animals.

India, home to a rich and diverse array of flora and fauna, holds a unique position in the global ecological landscape. From the snow-capped Himalayas and the dense forests of the Western Ghats to the arid Thar Desert and the mangroves of the Sundarbans, the country's varied ecosystems support an impressive range of wildlife species, many of which are endemic and endangered. However, this biodiversity is under increasing threat due to rapid urbanization, deforestation, habitat fragmentation, industrial expansion, and climate change. Human-wildlife conflict, illegal poaching, and encroachment into protected areas further exacerbate the challenges of wildlife conservation. In this context, the legal framework and institutional mechanisms for environmental protection play a crucial role in safeguarding the nation's natural heritage.

Among the legal tools developed to address these issues, **Public Interest Litigation (PIL)** has emerged as a powerful means of environmental advocacy and accountability. Unlike traditional litigation, which requires a direct personal stake in the matter, PIL allows any concerned citizen or organization to approach the judiciary for the enforcement of rights that affect the public at large. This progressive jurisprudential development, pioneered by the Indian judiciary in the late 1970s and early 1980s, has significantly widened access to justice and enabled courts to act as custodians of environmental protection.

The concept of PIL is closely tied to the interpretation of **Article 21 of the Constitution**, which guarantees the right to life and personal liberty. Through a series of landmark judgments, the Indian Supreme Court has interpreted this right to include the right to a clean and healthy environment, thereby giving constitutional legitimacy to environmental concerns, including wildlife protection. Provisions such as **Article 48A**, which directs the State to protect and improve the environment and safeguard forests and wildlife, and **Article 51A(g)**, which casts a fundamental duty on every citizen to protect the natural environment, have also provided strong normative support for judicial intervention in ecological matters.

Over the years, courts have played a transformative role in wildlife conservation by responding to PILs that challenged ecologically damaging practices, demanded stricter enforcement of wildlife laws, and sought protection for endangered species and critical habitats. Cases such as *T.N. Godavarman Thirumulpad v. Union of India* and *Centre for Environmental Law, WWF-India v. Union of India* have become milestones in Indian environmental jurisprudence, setting precedents for sustainable development and proactive conservation policies. In these instances, the judiciary has not hesitated to direct the establishment of monitoring authorities, halt infrastructure projects, or mandate the preparation of conservation

action plans, reflecting its commitment to environmental justice.

Despite these successes, the use of PIL in wildlife conservation is not without critique. Concerns about judicial overreach, delays in implementation, inconsistent outcomes, and the risk of PILs being used for ulterior motives highlight the complexities involved in judicial activism. Moreover, conservation efforts require scientific expertise, local community engagement, and long-term policy planning—areas where judicial orders alone may fall short.

This paper aims to critically examine the role of PIL in wildlife conservation in India by analyzing its legal foundations, landmark cases, and overall impact on environmental governance. It seeks to assess whether PIL has truly empowered conservation efforts or merely filled the void left by legislative and executive inaction. In doing so, the research underscores the need for an integrated approach to wildlife protection—one that combines legal intervention, scientific conservation, and participatory governance to ensure the sustainability of India's invaluable wildlife resources.

## 2. Legal Framework for Wildlife Protection in India

**2.1 The Constitution of India**, though originally silent on environmental issues, has evolved to include a strong **constitutional mandate for wildlife and environmental protection**. Through a series of amendments, judicial interpretations, and statutory enactments, the Constitution now reflects the nation's commitment to safeguarding its biodiversity and natural ecosystems. This mandate forms the legal and moral foundation for wildlife conservation and guides both legislative and judicial action, including the development of Public Interest Litigation (PIL) as a means of environmental enforcement.

### Directive Principles of State Policy – Article 48A

Inserted by the **42nd Constitutional Amendment Act, 1976, Article 48A** directs the State to:

*"The state shall endeavor to protect and improve the environment and to safeguard the forests and wildlife of the country."*

Though not justiciable in a court of law, Article 48A provides a powerful directive to the State, signaling that wildlife protection is not merely a policy choice but a constitutional responsibility. Courts have used this provision to interpret and reinforce statutory obligations under environmental and wildlife laws.

### Fundamental Duties – Article 51A(g)

Also introduced by the 42nd Amendment, **Article 51A(g)** imposes a **fundamental duty** on every citizen of India:

*"To have empathy for all living things and to preserve and enhance the natural environment, which includes lakes, rivers, woods, and wildlife."*

This provision reflects the participatory philosophy of the Constitution, recognizing that wildlife conservation is not solely the government's burden, but a shared civic responsibility. Courts have invoked this article to justify the involvement of individuals and organizations in wildlife-related PILs, even when they are not directly affected parties.

### Fundamental Rights – Article 21: Right to Life

The **right to life and personal liberty** under **Article 21** has been judicially interpreted to include the **right to a healthy environment**, which encompasses the protection of wildlife and natural ecosystems. Here are some important cases:

- **M.C. Mehta v. Union of India** (1987–ongoing series),
- **T.N. Godavarman Thirumulpad v. Union of India** (1995–ongoing),
- **Animal Welfare Board of India v. A. Nagaraja** (2014),

the Supreme Court has expanded the scope of Article 21 to include ecological rights,

sustainable development, and animal welfare, thus embedding wildlife protection within the framework of fundamental rights.

### Concurrent List – Schedule VII, List III, Entry 17B and 17A

Additionally, the 42nd Amendment moved environmental topics from the State List to the Concurrent List, allowing the States and the Union to enact laws on:

- **Entry 17B:** Protection of wild animals and birds.
- **Entry 17A:** Forests.

This reallocation reflects the recognition of environmental issues, including wildlife conservation, as matters of **national importance** requiring coordinated legislative and administrative action.

### 2.2 Judicial Interpretations of Constitutional Mandates

Indian courts have consistently interpreted the constitutional provisions in favor of ecological protection. In **Centre for Environmental Law, WWF-India v. Union of India (2013)**, the Supreme Court emphasized the need for protection of endangered species and directed the formulation of species recovery plans. In **Animal Welfare Board v. A. Nagaraja (2014)**, the Court recognized animal welfare as a constitutional mandate and emphasized **intrinsic value of animal life**, declaring that animals have a right to live with dignity.

In order to reaffirm that the State owns wildlife and forests in trust for the benefit of present and future generations, the courts have also emphasized the public trust theory, sustainable development, and the intergenerational equity principle.

### 2.3 Key Statutes

- **The Wildlife (Protection) Act, 1972**
  - Institutes protected areas such as national parks and wildlife sanctuaries.

- Prohibits hunting of scheduled species.
- Empowers authorities to regulate trade in wildlife products.

- **The Forest (Conservation) Act, 1980**

- Prevents deforestation by requiring central government approval for forest land conversion.

- **The Environment (Protection) Act, 1986**

- Provides the central government with powers to take measures for environmental protection and regulation.

### 2.4 International Obligations

- **Convention on Biological Diversity (CBD):**

An international agreement known as the Convention on Biological Diversity (CBD) was signed during the 1992 Rio de Janeiro Earth Summit. More than 190 nations, including India, have ratified it since it went into effect on December 29, 1993.

The three primary goals of the CBD are:

1. Preservation of biological variety;
2. Sustainable utilization of its constituent parts; and
3. Fair distribution of the benefits of genetic resource utilization.

The Convention recognizes the growing threats to biodiversity and its value as a global resource for present and future generations. It promotes international cooperation while highlighting national sovereignty over natural resources.

In order to carry out its obligations under the Convention, India, a party to the CBD, passed the Biological Diversity Act of 2002. The Cartagena Protocol (on Biosafety) and the Nagoya Protocol (on Access and Benefit Sharing) were both developed as a result of the CBD.

The CBD plays a key role in international

initiatives to combat climate change, conserve endangered species, encourage conservation, and guarantee benefit-sharing and community involvement.

- **CITES (Convention on International Trade in Endangered Species) :**

An international agreement known as the Convention on Biological Diversity (CBD) was signed during the 1992 Rio de Janeiro Earth Summit. It aims to ensure that wild flora and animals are not endangered by the international trade in them.

CITES works by **regulating and monitoring trade** in over **38,000 species** of flora and fauna through a system of **permits and certificates**. Species are listed under **three Appendices** based on the level of protection they need:

- **Appendix I:** Only under specific circumstances is the trade in extinction-threatened species permitted.
- **Appendix II:** Trade is regulated for species that are not now threatened but may become so.
- **Appendix III:** species that are protected in at least one country; trading requires cooperation from other countries.

India is a **party to CITES since 1976** and implements its provisions through the **Wildlife (Protection) Act, 1972**, regulating the trade of endangered species and enforcing strict penalties for violations.

CITES plays a vital role in combating **illegal wildlife trade**, protecting endangered species like tigers, elephants, rhinos, and various rare plants, and promoting **sustainable use of biodiversity**.

- **Ramsar Convention on Wetlands :**

The **Ramsar Convention on Wetlands**, adopted in 1971 in Ramsar, Iran, is an international treaty aimed at the conservation and sustainable use of wetlands worldwide. Its main objective is to protect wetlands, which are crucial for biodiversity, water purification, and climate regulation. The convention encourages countries to designate wetlands of international

importance, known as **Ramsar Sites**, and to ensure their protection and sustainable management.

Key points of the Ramsar Convention:

- **International Cooperation:** It promotes collaboration among countries to preserve wetlands and share knowledge on best practices for wetland management.
- **Wetland Designation:** Countries are encouraged to identify and designate wetlands that meet specific ecological criteria as Ramsar Sites.
- **Sustainable Use:** The treaty emphasizes the importance of balancing conservation with the sustainable use of wetlands for the benefit of both people and wildlife.
- **Monitoring:** Parties are required to report on the condition and management of Ramsar Sites to ensure ongoing protection.

The Ramsar Convention currently has over 170 contracting parties, and there are more than 2,400 Ramsar Sites globally. The Convention has played a crucial role in raising awareness about wetland conservation and has provided a framework for global action on wetland protection.

### 3. Evolution and Jurisprudence of Public Interest Litigation in India

#### 3.1 Origins and Philosophy

The PIL mechanism evolved in the 1980s with a liberal interpretation of **Article 32** and **Article 226** by the Supreme Court and High Courts. This allowed access to justice for those unable to approach the courts directly, including nature and wildlife.

The emergence of **Public Interest Litigation (PIL)** in India represents a remarkable development in the country's constitutional jurisprudence. It transformed the traditional role of the judiciary and democratized access to

justice by allowing individuals and groups—often with no direct personal interest in a case—to seek legal remedies for the enforcement of public duties and constitutional rights. The evolution of PIL in India was driven by a combination of **constitutional philosophy, judicial creativity, and social need**, and it has become a powerful tool for social and environmental justice, including wildlife conservation.

#### Historical Origins

In India, PIL got its start in the late 1970s and early 1980s, when people were becoming more conscious of environmental degradation, administrative indifference, and human rights abuses. The Indian judiciary began extending the reach of traditional writ jurisdiction under Articles 32 and 226 as a result of liberal interpretations of the Indian Constitution and international human rights movements. *Hussainara Khatoon v. State of Bihar* (1979) is a seminal case that is frequently cited as the start of PIL in India. The Supreme Court took suo motu cognizance of a newspaper article about prisoners awaiting trial in the State of Bihar (1979). Thousands of these inmates were released as a result of the Court's intervention, which also established the precedent for subsequent PILs. *S.P. Gupta v. Union of India* (1981) was another significant event. Justice P. N. Bhagwati, by easing the locus standi rule and permitting any public-spirited person to petition the court on behalf of the underprivileged or for the greater good, established the fundamentals of public interest litigation. Philosophical Foundations

#### Philosophical Foundations

The constitutional mandate for social justice and the conviction that the law must benefit all citizens, particularly the weak and voiceless, are the cornerstones of PIL's philosophy in India. It makes extensive use of the Directive Principles of State Policy (Part IV of the Constitution) and the Fundamental Duties (Article 51A), which offer an ethical framework for civic duty and governance despite not being

subject to the courts. A rights-based approach to justice serves as the foundation for PIL.

#### PIL and the Shift in Judicial Role

PIL represents a **paradigm shift** in the Indian legal system—from the traditional **adversarial model** to a more **collaborative and inquisitorial approach**. The court assumes a protective role for the public interest and often takes **suo motu cognizance** of issues brought to its attention through media, letters, or petitions filed by concerned citizens. This transformation has allowed the judiciary to intervene in issues ranging from bonded labor and child rights to forest conservation, pollution control, and the protection of endangered species.

The **epistolary jurisdiction**—where even a letter or postcard addressed to a judge could become a PIL—was a revolutionary innovation that expanded access to justice and signaled the judiciary's openness to non-traditional litigants. This has made PIL particularly effective in the realm of **environmental and wildlife protection**, where affected species or ecosystems cannot represent themselves in court.

The origins and philosophy of PIL in India are deeply intertwined with the country's constitutional vision of justice, equality, and environmental sustainability. PIL emerged as a response to the systemic failures of the executive and legislature and has since evolved into a dynamic instrument for public accountability and legal empowerment. While its potential is immense, its effectiveness ultimately depends on responsible use, judicial restraint, and constructive engagement with other democratic institutions. In the context of wildlife conservation, PIL exemplifies how law can become a vehicle for ecological ethics and intergenerational equity.

#### 3.2 Notable Judicial Doctrines Developed

- **Public Trust Doctrine:** Natural resources are held by the State in trust for the public.

- **Precautionary Principle:** Preventative measures must be taken when environmental harm is possible.
- **Polluter Pays Principle:** The polluter bears the cost of environmental damage.

#### 4. Judicial Activism in Wildlife Conservation

##### 4.1 Landmark PILs and Judicial Interventions

###### a) M.C. Mehta v. Union of India (Taj Trapezium Case, 1997)

The Supreme Court issued directions to relocate industries around protected zones such as the Bharatpur Bird Sanctuary and Ranthambore National Park.

###### b) Centre for Environmental Law, WWF v. Union of India (2013)

The court emphasized the "species best interest standard," asserting that animals have intrinsic rights and must be protected irrespective of utility to humans.

###### c) Animal Welfare Board of India v. A. Nagaraja (2014)

Banned the traditional bull-taming sport "Jallikattu" citing cruelty and upheld the rights of animals under **Article 21** interpreted as applicable to all life forms.

###### d) Goa Foundation v. Union of India (2014)

Led to the cancellation of mining leases in forest areas affecting wildlife habitats.

##### 4.2 Supreme Court Guidelines for Protected Areas

- Declaration of **eco-sensitive zones** around sanctuaries and national parks.
- Prohibition of construction, mining, and industrial activity in these zones.
- Directions for creating **Wildlife Crime Control Bureaus** and better enforcement mechanisms.

#### 5. Impact and Effectiveness of PILs in Wildlife Protection

##### 5.1 Positive Outcomes

- Enhanced public awareness and media attention on wildlife issues.
- Strengthening of wildlife law enforcement through judicial monitoring.
- Empowerment of NGOs and civil society groups in conservation efforts.
- Creation of national wildlife action plans and advisory bodies.

##### 5.2 Limitations and Criticism

- **Judicial Overreach:** Critics argue that courts may overstep their role by formulating policies.
- **Implementation Deficit:** Government agencies may delay or dilute court orders.
- **Strategic Misuse:** Some PILs are filed for ulterior motives, wasting judicial time.

#### 6. Comparative Jurisprudence

India's model of judicial activism through PIL stands out globally. While countries like the U.S. have strict "locus standi" rules, India's liberal approach enables broader environmental advocacy. However, this flexibility also necessitates judicial restraint and adherence to procedural discipline.

Public Interest Litigation (PIL) as a legal mechanism for advancing environmental and wildlife conservation has found unique expressions in various jurisdictions. While India has pioneered and institutionalized PIL as an integral part of its environmental jurisprudence, other countries have developed parallel mechanisms that reflect both similarities and contextual distinctions. This section explores comparative jurisprudence across select countries to highlight how legal systems engage with wildlife protection through judicial activism, citizen participation, and constitutional mandates.

##### 1. India: Judicial Activism and Expansive Environmental Rights

India stands out for its **innovative use of PIL**, particularly in environmental and wildlife

matters. The Indian Supreme Court has expanded the scope of **Article 21 (Right to Life)** to include the **right to a healthy environment**, allowing the judiciary to intervene in ecological matters. Landmark cases such as *T.N. Godavarman Thirumulpad v. Union of India* and *Centre for Environmental Law, WWF-India v. Union of India* demonstrate how the courts have enforced wildlife laws, halted destructive development, and created new regulatory bodies. The concept of “**epistolary jurisdiction**”, where even letters to the court were treated as writ petitions, further demonstrates the liberalized approach India has adopted in PIL.

### 2. United States: Citizen Suits and Statutory Remedies

In contrast to India’s Constitution-based PIL, the **United States** follows a **statutory model** for environmental litigation. Under laws such as the **Endangered Species Act (ESA), 1973**, and the **National Environmental Policy Act (NEPA), 1969**, citizens and environmental groups can file “**citizen suits**” against violators or regulatory agencies that fail to enforce the law. In *Tennessee Valley Authority v. Hill (1978)*, the U.S. Supreme Court upheld the protection of the endangered snail darter fish, halting a nearly completed dam project. However, the U.S. maintains stricter **standing requirements**, and plaintiffs must demonstrate direct injury, which limits the broad-based access seen in Indian PILs.

### 3. South Africa: Environmental Rights as Fundamental Rights

South Africa’s **Constitution (1996)** explicitly provides for **environmental rights** under **Section 24**, affirming the right of every person to an environment that is not harmful to health or well-being and that is protected for future generations. The South African legal system permits **broad standing**, enabling public interest litigation for environmental protection. In *Fuel Retailers Association of Southern Africa v. Director-General Environmental Management (2007)*, the Constitutional Court emphasized sustainable development and the need for

integrated environmental governance. Much like India, South Africa’s courts have taken an active role in interpreting environmental rights.

### 4. Kenya: Expanding Access Through Constitutional Guarantees

Kenya’s **2010 Constitution** significantly advanced environmental justice by granting every citizen the right to a clean and healthy environment under **Article 42**, with broad standing provisions under **Article 70**. Courts can be approached by any person to seek redress for environmental harm, even without proving personal injury—similar to India’s relaxed locus standi in PILs. In *Save Lamu & Others v. National Environmental Management Authority (2017)*, the Kenyan court emphasized public participation and procedural fairness in environmental decision-making.

### 5. Australia: Focus on Administrative Law and Limited Judicial Innovation

Australia adopts a more restrained approach. Although environmental protection is governed by strong legislation such as the **Environment Protection and Biodiversity Conservation Act, 1999**, judicial review of environmental decisions is primarily framed within **administrative law**. Unlike India, courts do not typically engage in proactive environmental governance. However, environmental groups may seek judicial review of government decisions, particularly if statutory provisions for standing are met.

### Comparative Reflections

The comparative analysis reveals that while India’s judiciary has taken a **normative, rights-based, and activist approach** to wildlife conservation through PILs, other jurisdictions rely more heavily on **statutory frameworks** and **citizen-led enforcement mechanisms**. Countries like South Africa and Kenya share India’s broad standing provisions and constitutional environmental rights, while the U.S. and Australia follow stricter procedural norms.

India’s model has both strengths and limitations. Its openness to public participation

and judicial creativity has enabled significant gains in wildlife protection. Yet, questions of judicial overreach, implementation deficits, and science-policy mismatches persist. On the other hand, systems like the U.S., with defined legal procedures and clear agency responsibilities, offer legal certainty but may be less accessible to marginalized voices.

A truly effective approach may lie in **blending the participatory ethos of Indian PIL with the institutional rigor and technical integration** found in other systems. This comparative perspective helps underscore the importance of adaptive legal frameworks that are responsive to ecological needs while ensuring procedural integrity and democratic accountability

## 7. Recommendations

1. **Strengthen Institutional Capacities:** Provide better training and resources for forest and wildlife officials.
2. **Enhance Community Participation:** Recognize and empower indigenous communities in wildlife conservation.
3. **Promote Environmental Education:** Increase ecological literacy to foster a conservation ethic.
4. **Improve Coordination:** Align the functioning of judiciary, executive, and legislature in environmental governance.
5. **Expand Eco-centric Jurisprudence:** Treat nature as a rights-holder, following the "rights of nature" movement.

## 8. Conclusion

Public Interest Litigation has played a transformative role in India's journey toward environmental and wildlife conservation. By acting as a bridge between constitutional values and ecological imperatives, PIL has empowered citizens, protected voiceless species, and compelled administrative responsiveness. While challenges remain, the future of wildlife conservation depends significantly on continued legal vigilance, judicial commitment, and public engagement.

Wildlife conservation in India stands at a critical juncture, confronted by the dual challenges of ecological degradation and developmental pressures. In this complex landscape, **Public Interest Litigation (PIL)** has emerged not merely as a legal tool but as a symbol of participatory environmental governance and judicial activism. The Indian judiciary, particularly the Supreme Court and various High Courts, has played a transformative role in elevating environmental protection—and wildlife conservation in particular—to the level of constitutional importance by interpreting the right to a healthy environment as intrinsic to the right to life under **Article 21** of the Constitution.

This paper has examined how PIL has been instrumental in shaping wildlife conservation policies and ensuring compliance with statutory mandates like the **Wildlife (Protection) Act, 1972**, the **Forest (Conservation) Act, 1980**, and the **Environment (Protection) Act, 1986**. Through landmark judgments such as *T.N. Godavarman Thirumulpad v. Union of India*, *Centre for Environmental Law, WWF-India v. Union of India*, and other significant interventions, courts have established precedents for forest preservation, habitat protection, and the regulation of industrial activities that threaten wildlife ecosystems. These cases demonstrate the judiciary's willingness to act as a guardian of the environment in instances where the legislative and executive branches have faltered or been slow to act.

One of the most profound contributions of PIL in this context is its democratizing effect—it has empowered ordinary citizens, environmental activists, and civil society organizations to seek legal redress in matters of ecological concern. By relaxing the rules of locus standi, the courts have allowed the voiceless—the wildlife, forests, and ecosystems—to be represented in the legal arena. This has significantly contributed to building public awareness and institutional accountability in wildlife conservation.

However, the reliance on PIL as a conservation strategy also brings to light its **inherent limitations**. Judicial orders, though powerful, often face obstacles in on-ground implementation due to bureaucratic inertia, lack of inter-agency coordination, or resistance from vested interests. The judiciary, despite its proactive stance, may lack the technical expertise and administrative machinery required to execute conservation plans effectively. Additionally, the increasing number of PILs filed without adequate scientific backing or long-term vision risks diluting the sanctity of this legal tool and may inadvertently hinder genuine conservation efforts.

Going forward, it is imperative to view PIL not as a substitute for governance but as a **complementary mechanism** that must operate in tandem with robust legislative intent, scientific conservation strategies, and community-based participation. Strengthening environmental institutions, ensuring capacity building of forest and wildlife departments, incorporating traditional knowledge systems, and fostering collaborative governance models are essential to make wildlife conservation more effective and inclusive.

In conclusion, PIL has undoubtedly played a **catalytic role** in wildlife conservation in India. It has expanded the horizons of environmental jurisprudence, held state and non-state actors accountable, and provided a legal voice to environmental concerns that may have otherwise been ignored. Yet, for long-term sustainability, conservation must evolve beyond the courtroom and be integrated into the broader frameworks of governance, policy-making, and public consciousness. Only through such a multidimensional approach can India hope to preserve its rich wildlife heritage for future generations.

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