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Sustainable Development and its Legal Framework in India: An Analysis

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ABSTRACT

There is a need to develop new approaches to deal with the effects of growing urbanization, such as rising demands for water and electricity, hygiene, services provided by the government, education, and healthcare. This paper aims to discuss the challenges and issues associated with sustainable development policies and their legal framework in India. We cannot deprive natural resources for economic growth and development. For growth to be sustainable there must be a balance between economic, ecological, and social growth with the protection of natural resources. The developmental advancement of science and technology cannot permit environmental degradation. The Concept of Sustainable development was formalized in UNCED in 1992 and reflected in various international declarations, conventions, etc. has become a part of national law and its policy. Hence, development policies must be strategized and aimed toward ecological vis-a-vis social growth. In response to increasing environmental challenges, Indian policy towards sustainable development need to be reformed. However, for such policy reforms to be effective, it needs to restrict certain limitations on government or private agencies within the bounds of economic development. This paper will demonstrate and analyze policies of environmental development, challenges and issues of environmental laws in India, and their legal application.

Keywords: Sustainable, Development, Policy, Laws, Issues.

I. INTRODUCTION

The protection and improvement of the human environment has become a worldwide concern. Human activities in different spheres of life have increasingly threatened the environment.² The global environmental crisis is primarily a crisis of the development of its values. Environmental Considerations are being ignored by mankind in decision-making. Human behavior has destroyed the environment.³ The population explosion combined with dramatically higher per capita consumption of material goods, especially in the industrialized countries has resulted in

¹ Author is an Assistant Professor at MNLU Nagpur, India.

² Verma, S. K., *An Introduction to Public International Law*, 3rd Edi. Satyam Law International, New Dehli, 2019.

³ Fujita, K., & Mizushima, T., *Sustainable Development in India: Groundwater Irrigation, Energy Use, and Food Production*, Routledge. <https://doi.org/10.4324/9781003036074>, (June 30, 2023, 07:45 PM)

staggering jumps in energy consumption, carbon emission, water consumption, fish consumption, land degradation, and deforestation. While considering all these environmental degradation and development issues, the concept of sustainable development is imparted in international and national legal regimes. Sustainable Development is the organizing principle for meeting human development goals while simultaneously sustaining the ability of the natural system to provide the natural resources and ecosystem upon which the ecosystem and society depend. Sustainable Development in India Encompasses a variety of development schemes in Social, cleantech(Clean energy, clean water, and sustainable agriculture), and human resource segments, having caught the attention of both central and state governments and also private and public sectors. The principle of sustainable development emphasizes two basic needs, firstly, the need for socio-economic development, and secondly, the need for limitations imposed on the environment's capability to cope with the present and future requirements.⁴ The perspectives of the environment in sustainable development are such that the development goes with ecological, economic, and social development with sustaining natural resources and their equitable use for all. Apart from the Constitutional and legislative provisions related to sustainable development, India adopted the 2030 global agenda for moving forward for achieving a world free from poverty, gender inequality, and economic inequality and thereby ensuring a healthy planet for future generations.⁵

II. INTERNATIONAL PERSPECTIVES ON SUSTAINABLE DEVELOPMENT

To start the idea of Sustainable development in the global system, the Brundtland report of 1987 characterizes Sustainable development as an improvement that addresses the issues of the present without compromising the capacity of people in the future to address their issues. As a result, sustainable development necessitates providing for everyone's fundamental needs and providing them with opportunities to realize their dreams of a better life. The environment, society, and the economy are the three pillars of sustainability, and this idea focuses on a variety of issues.⁶ The Brundtland report perceived, that all conditions were not appropriate to progress society at a worldwide level. Although the Stockholm Declaration, which was the first international conference based on environmental issues, was adopted in 1972, the idea of sustainable development gained prominence. Although this conference addressed integrated

⁴ *Legal Framework in India to protect the Environment*, IPLEADERS, July 30, 2016. <https://blog.ipleaders.in/legal-framework-india-protect-environment/> (last visited on June 6, 2023)

⁵ SUSTAINABLE DEVELOPMENT AND CLIMATE CHANGE, UNION BUDGET, <https://www.indiabudget.gov.in/economicsurvey/doc/eschapter/echap06.pdf>. (June 4, 2023, 12:10 PM)

⁶ EDUCATION FOR SUSTAINABLE DEVELOPMENT, www2.le.ac.uk/offices/lli/designing-your-course/curriculum-design/education-for-sustainable-development/esd-resource-bank-1/an-introduction-to-sustainable-development, (June 6, 2023, 11:10 AM)

plans and policies on economic development and environmental sensitivity, it did not address the need for integration and coordination in development planning to protect the environment.⁷ The World Conservation Strategy was created in 1980 by the International Union for Conservation of Nature (IUCN) and the United Nations Environment Programme (UNEP) with their guidance. The Montreal Protocol for the Protection of the Ozone Layer, which was signed in 1987, and the instruments that were adopted at the UN Conference on Environment and Development (World Summit) in Rio in 1992 are based on the idea of sustainable development. Sustainable development was reaffirmed as an essential component of the international agenda at the World Summit on Sustainable Development in 2002. The Rio Declaration, which was issued at the United Nations Conference on Sustainable Development, detailed specific steps that could be taken to implement sustainable development.⁸ The 21 activities and agendas are organized around environmental and development themes like the quality of life, efficient use of natural resources, global commons protection, human settlement management, and sustainable economic growth.⁹

The Rule of Sustainable development depends on the theory of intergenerational value. A fundamental belief in the dignity and equality of human rights for all members of society can be seen in the UN Charter, the Universal Declaration of Human Rights (UDHR), the UN Convention on the Rights of the Child (UNCPR), and numerous other human rights documents. This large number of Global archives worried for equity to people in the future ought to be qualified for a variety similar to that delighted in by past age in the illumination of various financial, ecological, social, and political conditions winning inside and between the nations. Precautionary principles assume an extremely critical part in deciding if the formative cycle is practical not and underlies the action should be halted and forestalled on the off chance that it causes gross and serious irreversible natural harm. The Organization for Economics and Development (OCED) developed the "Polluter Pays Principles" and adopted a recommendation for allocating the costs of pollution prevention and control measures.¹⁰ In addition, the Polluter Pays principle played a significant role in the 1992 Rio Declaration. The UNCED (Rio Declaration) established the interconnectedness of human activity and the environment as the foundation for a new global commitment to sustainable development. This Conference, also

⁷ Prizzia, R, *Sustainable Development in International perspectives*, <https://dspace.lib.hawaii.edu/bitstream/10790/3359/1/prizzia.r-2007-0038.pdf>. (June 6. 2023, 2:30 PM)

⁸ Singh, G. *Environmental Law*, Second Edi., Eastern Book Company, 2016.

⁹ Prizzia, R, *Sustainable Development in International perspectives*, (June 6. 2023, 09:30PM) <https://dspace.lib.hawaii.edu/bitstream/10790/3359/1/prizzia.r-2007-0038.pdf>.

¹⁰ *The Polluter Pays Principles*, OECD ANALYSIS, AND RECOMMENDATIONS, 1992. (June 6, 2023, 09:25 PM) [https://one.oecd.org/document/OCDE/GD\(92\)81/En/pdf](https://one.oecd.org/document/OCDE/GD(92)81/En/pdf).

known as the Earth Summit, was attended by delegates from 182 nations. It was biggest between legislative gatherings at any point held.¹¹ The Rio Declaration on Environment and Development, the Convention on Climate Change, the Convention on Biodiversity, the Forest Principles, and Agenda 21 are the five UNCED documents that serve as the foundation for the principle of sustainable development.¹²

III. PRINCIPLE OF SUSTAINABLE DEVELOPMENT UNDER THE INDIAN CONSTITUTION

The right to a healthy environment is included in Article 21 of the Indian Constitution, which guarantees every individual's right to life and individual freedom. Article 21 of the Constitution states that any alteration to the basic environmental components—air, water, and soil that are required for "life" and would be detrimental to "life" falls under its purview.¹³ The 42nd Amendment to the Constitution of India, also known as the Constitutional Amendment Act of 1976, expressly incorporated specific provisions for environmental protection and improved the form of the environment under the Fundamental Duties and Directive principles of state policy in the Indian Constitution at the time. This amendment was merely a response to the 1972 Stockholm Declaration, which emphasized that humans have a grave duty to protect and improve the environment for the benefit of future generations as well as the present.

The 42nd Amendment Act of 1976 included the addition of Articles 48-A and 51-A(g) to the Constitution as a part of fundamental duties (part 4A). Every Indian citizen, according to this law, must exhibit compassion for all living things and work to preserve and enhance the natural world, which includes trees, rivers, lakes, and biodiversity. As a result, the fundamental obligation that each citizen has to preserve and enhance the natural environment is referred to in Article 51 A (g). This arrangement of Crucial obligations streams from the World Charter for Nature embraced by the General Assembly of the United Nations on 28 October 1982 and perceives the freedoms of People and different elements by giving that all individuals will approach the method for review when their current circumstances have endured harm or corruption.¹⁴

Art IV of the Constitution manages Part IV of DPSP, these directions are intended to direct the Fate of the country by committing three Wings of the state to execute these standards. According

¹¹ Agrawal, H. O., *International Law and Human Rights*, 21st ed., Central Law Publications, 2017.

¹² Singh, G. *Environmental Law*, Second Edi., Eastern Book Company, 2016.

¹³ M.C. Mehta v. Kamal Nath, AIR 2000 SC 1997

¹⁴ ART. 23, WORLD CHARTER OF NATURE, <https://digitallibrary.un.org/record/39295?ln=en>, (June 5, 2023, 08:20AM)

to Article 47, it is the responsibility of the state to raise nutrition standards, standard of living, and public health. Article 48A, which was added by the 42nd Amendment Act of 1976, states that the state must work to improve and protect the environment as well as forests and wildlife. The Directive Principles structure the key component and the social heart of the constitution and the constitution charges upon the state to carry out these goals of sustainable development with the help of Directive Principles of State policy in India. In the case of *MC Mehta Vs Union of India*¹⁵ which is popularly known as the CNG case the court reiterated that articles 39(e), 47, and 48A without anyone else and on the whole Expense an obligation on the state to get the strength of individuals and work on general wellbeing and secure and work on the environment protection.

IV. REFLECTION OF SUSTAINABLE DEVELOPMENT UNDER THE INDIAN LEGAL SCENARIO

One of the few countries in the world with extensive environmental laws is India. Article 21 was heavily used by Indian courts to apply the law to the decision-making process regarding environmental perspectives and provisional duties.¹⁶

Parliament can pass laws to put into effect international treaties, conventions, or decisions made at international conferences as per Article 253. As a result, in 1974, the Water (Prevention and Control of Pollution) Act was enacted to carry out the provisions laid down at the Stockholm conference.¹⁷ The purpose of this law is to keep or restore the health of the country's water supply while also preventing and controlling water pollution. It also provides for the creation of Boards for the prevention and control of water pollution in order to accomplish the aforementioned goals. The Water Act forbids the release of contaminants into bodies of water after a certain threshold and lays out penalties for defiance. The Central Pollution Control Board, established by the Water Act at the center, establishes standards for controlling and preventing water pollution. The Central Pollution Control Board and the State Government direct State Pollution Control Board operations at the state level.

The Air (Prevention and Control of Pollution) Act, 1981 (hereafter referred to as "Air Act") is a law to allow for the prevention, control, and reduction of air pollution as well as for the establishment of sheets at the focal and state levels in order to accomplish the aforementioned goals. To address difficulties associated with air pollution, the Air Act established requirements

¹⁵ AIR 1987 SC 1087

¹⁶ Ayesha Mehrotra, *Sustainable Development laws in India*, ONE FUTURE COLLECTIVE, 2018, www.onefuturecollective.Sustainable-development-laws-in-india/ (June 6, 2023, 10:45PM)

¹⁷ Objectives of the Water (Prevention and Control of Pollution) Act, 1974

for ambient quality of the air. The Air Act regulates appliances that contribute to air pollution and prohibits the use of polluting fuels and substances to combat air pollution. According to the Air Act, the State Government can appoint any field or area within the State as an air pollution controlling area or area after conferring with the State Pollution Control Boards. The Act stipulates that State Pollution Control Board approval is required before the construction or operation of any industrial facility within the pollution control area. SPCBs are additionally expected to investigate production procedures, pollution control tools, and the air in air pollution control zones.

The environment is safeguarded and improved by the Environment Protection Act of 1986 (hereafter referred to "Environment Act"). The legislation known as the Environment Protection Act establishes a framework for rapid and appropriate responses to environmental risks and provides the foundation for investigating, planning, and implementing long-term environmental safety standards. It is an overarching rule created to provide a framework for the coordination of focal and state experts as specified by the 1974 Water Act and the Air Act. The word "environment" has a very broad definition under section 2(a) of the Environment Act. It encompasses the links between individuals, other living beings, other living beings, microbes, organisms, and property as well as the relationships between the surface air, the earth, and the sea.

In order to safeguard and enhance the quality of the environment, manage the area of organizations, minimize risky waste, guarantee general well-being, and provide government assistance, the Central Government is empowered by the Environment Act to establish standards for any industry or activity emissions and discharges of pollution into the atmosphere. The Central Government occasionally releases notices for the protection of environmentally sensitive regions or instructions for concerns relating to the Environment Act.

The National Green Tribunal Act (NGT Act), which was approved in 2010, aims to support the establishment of a National Green Tribunal (NGT) for the effective and prompt resolution of cases involving climate insurance, the safeguarding of forests and other common assets, as well as ensuring the enforcement of any legal rights related to the climate and providing assistance and compensation for damages to people and property and issues related to or coincidental to those damages.

There are a few regulations that straightforwardly or by implication manage perilous waste administration. The Factories Act of 1948, the Public Liability Insurance Act of 1991, the National Environment Tribunal Act of 1995, and the Environmental Act's rules and notifications

are the relevant statutes.¹⁸

V. SUSTAINABLE DEVELOPMENT GOALS IN INDIA

(A) What are the Sustainable Development Goals?¹⁹

The Sustainable Development Goals (SDGs), commonly referred to as the Global Goals, were established by the United Nations in 2015 as a worldwide call for intervention to eradicate poverty, safeguard the environment, and guarantee that by the year 2030, everyone will be able to live in a prosperous and peaceful world. Since efforts in one area are going to have an effect on results in other areas, the 17 SDGs recognize that development must find a balance between social, economic, and environmental sustainability. Nations have decided to give advancement to people who are a disadvantaged priority. The SDGs seek to eradicate hunger, AIDS, poverty, and discrimination against women and girls. In any environment, society's creative, technological, and financial resources are necessary to realise the SDGs.

Statements made by the Prime Minister and other senior ministers at national and international gatherings show that the Indian government is committed to the 2030 Agenda, which includes the SDGs. The SDGs and India's "Sab ka Saath, Sab ka Vikas," or "development with all, and for all," inclusive policy initiatives align well, and India will play a leading role in determining the global success of the SDGs.

(B) National Action on the SDGs in India

The foremost research organization in India, NITI Aayog, was appointed and tasked with organizing the SDGs. The lead and supporting ministries for each of the SDGs have been identified through NITI Aayog's mapping of schemes about the SDGs and their targets. The SDGs' interconnectedness across economic, social, and environmental pillars is emphasized in their government-wide approach to sustainable development. States have been advised to map their schemes similarly, including centrally sponsored ones.

In addition, the Ministry of Statistics and Programme Implementation (MoSPI) has been in charge of fostering discussions about the development of public indicators for the SDGs. The advancement of India toward the SDG Agenda depends on the state governments, and some of them are currently beginning to implement the SDGs.²⁰ India has declared that the Sustainable

¹⁸ Vaish V. & Mehta H., *Environment Laws in India*, MONDAQ, August 31, 2017. (June 6, 2023. 07:45 PM) www.mondaq.com/india/waste-management/624836/environment-laws-in-india.

¹⁹ SUSTAINABLE DEVELOPMENT GOALS, www.undp.org/sustainable-development-goals, (Last Visited on June 6, 2023)

²⁰ *Sustainable development goals*, UN INDIA, www.in.one.un.org/page/sustainable-development-goals/ (Last Visited on June 6, 2023)

Development Goals (SDGs) must be a development agenda. Even though poverty reduction and inclusive economic growth are still at the top of the development agenda, these enormous obstacles will require additional resources and capacity-building efforts. Accordingly, India has focused on worldwide coordinated efforts to help advancement, as well as appropriate techniques for execution, like expanded Official Development Assistance (ODA) and innovation moves based on good conditions to help agricultural nations.²¹

VI. ROLE OF INDIAN JUDICIARY

Indian Judiciary and especially Public Interest litigation have played an important role in the implementation of sustainable development which insists on the balanced synthesis of developmental and environmental imperatives.

In the case of *Vellore Citizens' Welfare Forum v. Union of India*²² The Supreme Court ruled that sustainable development, which strikes a balance between ecology and development, is part of customary international law and rejected the traditional definition of development. High Court repeated that the "Precautionary Principles" and "Polluter Pays Principle" comprised basic standards of global regulation and expressed that "Precautionary Principles" and "Polluter Pays Principle" and the extraordinary idea of the onus of confirmation have consolidated International law as is obvious from Articles 47, 48-A and 51-A(g) and that, as a matter of fact, in different natural resolutions, like the Water (Prevention and Control of Pollution) Act, 1974, the Environment (Protection) Act, 1986, and different rules, these ideas are directed and reflected in the same manner.

In the case of *Subhash Kumar vs. State of Bihar*,²³ the Hon'ble Apex Court held that the right to life under Article 21 incorporates the right to a healthy climate and implies the right to delight in contamination-free water and air for pleasure throughout everyday life.

In the landmark judgment on environmental jurisprudence in India, *M.C. Mehta vs. Kamal Nath*,²⁴ The Hon'ble Supreme Court ruled that the State Government breached the public trust by leasing ecologically fragile land to Motel management because natural resources like the air, sea, waters, and forests are so important to the people as a whole.

The Supreme Court interpreted and implemented the doctrine of Sustainable Development in

²¹ Oishika Benarji, *India's position in sustainable development goals*, www.blog.iplayers.in/indias-position-in-sustainable-development-goals/ (Last Visited on June 6, 2023)

²² (1996) 5 SCC 647.

²³ AIR 1991 SC 420/ 1991 (1) SCC 598

²⁴ (1997) 1 SCC 388

*Narmada Bachao Andolan vs. Union of India*²⁵ the Hon'ble Court stated and observed that "Sustainable Development means what kind or extent of development can occur, which can be sustained by nature or ecology with or without mitigation". The supreme court noted that the Sardar Sarovar dam's construction would not cause an ecological catastrophe but rather enhance it. This interpretation is a narrow interpretation of the court without recognizing the other negative impact of the dam constructions.

In the landmark case of *T.N. Godavaram Thirumulpad vs. Union of India*,²⁶ the Apex Court observed that "As a matter of preface, we may state that adherence to the principle of Sustainable Development is now a constitutional requirement." Each case's facts must be considered to determine how much damage has been done to the environment and ecology.

In *Indian Council of Enviro-Legal Action vs. Union of India*,²⁷ The Supreme Court concluded that while widespread environmental destruction and violation should not be allowed to occur as a result of economic development; simultaneously, the need to protect biology and climate shouldn't hamper monetary and different turns of events. As a result, both environment and development have received attention, and the goal is to strike a healthy balance between both.

VII. CONCLUSION

The role of Sustainable development is very significant in the matter's compliance and enforcement of national and international programs or instruments on development and environmental protection. For the implementation of the sustainable development standard, there is an urgent need for further development assistance to developing countries like India to meet the incremental cost of implementing legislation, developing standards, and capacity building of ecology and socio-economic growth. The role of NGOs is very crucial in the enforcement of laws and people's awareness. But the issue of enforcement of national legal obligation becomes particularly acute about damage caused to the environment. There are practically no national laws or rules existing in India on the issue of sustainable development. Sustainable development is, consequently, a notable chance for the world networks to convey comprehensive and inclusive development, dispose of the neediness of the poor and lessen the gamble of environmental issues which needs to tackle with having a significant impact on strategic viewpoints of the environmentalist and ways to deal with monetary turn of events. It requires everyone to participate in the pursuit of sustainable development. The world and India have a long and difficult road ahead of them to tackle environmental issues and learn how to

²⁵ (2000) 10 SCC 664

²⁶ (2006) 1 SCC 1

²⁷ (1996) 3 SCC 212

live together in sustainable communities. It needs to realize that economic and sustainable development are our shared obligations. We, as people, likewise need to develop into not being dependable by focusing on a changed way of life. We will have to wait longer to reverse the effects if we do not act now.

Development that does not harm the environment and is sustainable in nature is needed. Everyone is impacted by the way we approach development. The decisions we make as a society have real effects on the lives of other people. For instance, by consolidating well-being plans, for example, we can guarantee that occupants have simple admittance to medical care offices which thus will give them a solid way of life. Also, poverty and a degraded environment are closely linked, especially in areas where people primarily rely on the natural resources in their immediate environment for their livelihoods. A strategy to end poverty must therefore focus on restoring natural systems and enhancing natural resource management practices at the local level.

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