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Towards Operationalising a New Climate Right for India

Unpacking the Ranjitsinh Judgment

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The Ranjitsinh ruling of the Supreme Court is potentially far-reaching but its limited view of action on climate change risks causing an inadequate framing of policy. It is legislation that is built on a bottom-up approach that can act on the Court's calls for balance across multiple objectives.

Over the past decade, climate change has increasingly come to the focus of Indian academics and policymakers. But, until recently, explicit attention to climate change by the Indian judiciary has been limited.

This is poised to change with the Supreme Court's March 2024 judgment in *MK Ranjitsinh v. Union of India*.

The impetus for the case pertains to permissions for electricity transmission infrastructure in a habitat for critically endangered birds. But, in its decision, the court expands this issue into a far-reaching judgment that identifies a "right to be free from the adverse effects of climate change," rooted in two fundamental rights guaranteed by the Constitution – the right to equality (Article 14) and the right to life (Article 21).[1] For those interested in climate change, but also for the much larger audience interested in understanding how climate change could impact decision making in many spheres of Indian policy, it is well worth unpacking and understanding this judgment and how it is likely to be interpreted.

Early writing on the judgment provides diverse and even divergent perspectives on this decision. Positive commentaries note the significance of the judgment's linkage of climate change and human rights, the court's recognition of the government's argument that coal power has adverse effects on health and the environment, the direct engagement by the court versus past 'stealthy' and indirect legal engagement with climate change (Kumar and Naik 2024), and, as a result, the potential for the judgment to set an important precedent for enhanced climate litigation (Kodiveri 2024). The judgment has also been critiqued – including by those who have otherwise positive comments – for a limited view of India's energy transition, ignoring the potential negative environmental effects of renewable energy options under some circumstances (Dutta 2024; Kothari and Bajpai 2024; Kumar and Naik 2024; Sinha 2024), an over-generous assumption about links between renewable energy and benefits for the poor, and an overstated complementarity between development, biodiversity and climate mitigation. Notably, commentators are united in the view that the judgment can only be a starting point. Much depends on what comes next.

> It is important to view the judgment as an important step, but one that requires further conceptual and legal elaboration, rather than as a fully formed template for Indian climate jurisprudence.

We share the view that *Ranjitsinh* is potentially groundbreaking, and could open the door to an array of creative legal and policy pathways through the articulation of a climate right anchored in Article 14 and Article 21. But we are cautious because the judgment could also be interpreted in ways that conflate action on climate change with action on renewable energy, and contribute to an inadequate and incomplete framing for future climate law and policy.

Since *Ranjitsinh* invariably dwells on the specific issue before the court – infrastructure for renewable energy – it provides limited guidance on operationalising the new right to be free from the adverse effects of climate change that it reads into the Constitution. Some argue that this is a positive, that the judgment leaves time and space for a productive conversation on the content of this right. Perhaps – haste may be unwise on an issue this complex. At the same time, there is a risk that what is left unsaid or under-said will be ignored and therefore find insufficient resonance in Indian climate law and policy. It is important to view the judgment as an important step, but one that requires further conceptual and legal elaboration, rather than as a fully formed template for Indian climate jurisprudence. This article is intended to contribute to that discussion.

In what follows, we first provide background for and context to the judgment, and particularly highlight its positive potential. We then turn to a discussion on what *Ranjitsinh* could mean for future climate litigation, noting that there is scope for conflicting interpretations coming out of the judgment. We explore some of the shadows of the judgment, areas of omission that may need particular attention

– the incomplete treatment of adaptation to climate change, and the limited attention to approaches to climate mitigation beyond renewable energy. Drawing on both these themes, we discuss the challenges to operationalising the *Ranjitsinh* judgment. We conclude by summarising, and suggest that deliberate climate legislation, if appropriately crafted, could help backfill the spaces in *Ranjitsinh* and lead to a progressive and effective form of climate jurisprudence to inform policy.

Background and context

The *Ranjitsinh* case relates to the protection of two critically endangered species of birds – the Great Indian Bustard (GIB) and the Lesser Florican. One of the causes for the dwindling population of the birds is fatal collisions with overhead transmission lines criss-crossing their habitat.

Previously, in an April 2021 order in the same case, the Supreme Court had restricted the setting up of overhead transmission lines in the habitat area spanning 99,000 sq km in Gujarat and Rajasthan. Low voltage transmission lines were to be converted to underground lines, and for the high voltage transmission lines, a court-appointed committee was directed to look into the feasibility of laying them underground. This committee started functioning and considering cases where the feasibility of undergrounding was under question.

Subsequently, three union ministries – Ministry of Environment, Forest and Climate Change, Ministry of Power, and Ministry of New and Renewable Energy – approached the Supreme Court requesting for a modification of April 2021 directions. They reasoned that the order would impact the expansion of renewable energy in the country, as the region has significant wind and solar energy potential, and consequently on India's ability to reduce its reliance on fossil fuels and meet its climate commitments.

The Supreme Court in March 2024 removed the restriction that it had placed earlier on overhead transmission lines in the GIB's habitat area and set up a new expert committee that would consider the feasibility of underground transmission lines. Before reaching its final decision that wholeheartedly (and arguably somewhat uncritically) supports the expansion of infrastructure for renewable energy in the country, the court provided three broad arguments:

First, India has commitments under international conventions. Although the court refers to "global environmental conservation goals," it primarily relies on India's climate-related commitments under the United Nations Framework Convention on Climate Change (UNFCCC), and particularly those under the Kyoto Protocol and the Paris Agreement. It further alludes to India's Nationally Determined Contribution as part of these commitments, and specifically emphasises the country's renewable energy commitments, given the context of this specific case.

Second, the court articulates a new and distinct right – "the right to be free from the adverse effects of climate change" – which, according to the court, originates from two fundamental rights enumerated in the Constitution: the right to life (Article 21) and the right to equality (Article 14). The Court's recognition of how climate change impacts people's rights to life and health, how vulnerable communities will be worse affected and their right to equality violated, and the intersection between climate change and international human rights makes this judgment a potentially far-reaching one.

> The judgment will undoubtedly be remembered for its articulation of a new and distinct right to be free from the adverse effects of climate change. And this articulation certainly opens many doors for future legal, and possibly policy, exploration.

Third, solar energy is an important part of India's renewable energy portfolio, and its importance, according to the court, cannot be overstated. Solar energy is a crucial step towards cleaner, cheaper and sustainable energy, and would reduce India's reliance on fossil fuels. In its treatment of renewable energy, the court emphasises that it yields a "plethora of socio-economic benefits," such as enhancing air quality and energy security or creating green jobs, even if these are alluded to occasionally in unclear ways, such as confusingly attributing groundwater preserving benefits to renewable energy.

In the end, the court finds itself balancing two aims: the specific and narrower objective of conservation of the Great Indian Bustard (which it considered non-negotiable), and a general and much broader objective, which the court described as "the conservation of the environment as a whole." This latter aim, despite the broad framing, is articulated in terms of "the imperative of protecting against climate change" with specific reference to India's commitment to promoting renewable energy.

Based on this seeking of balance, the court found the decision to convert overhead lines to underground lines to be one "best left to domain experts instead of an a priori adjudication by the Court." It thus recalled the earlier "blanket prohibition" on overhead transmission lines. The new expert committee is supposed to determine the scope, feasibility and extent of overhead and underground lines in 13,663 sq km of the bustard's habitat area, considered to be the "priority area," and look into various conservation measures for the bird. The court also directed the union government to implement measures that it had undertaken to implement in its affidavit to protect the bustard and its habitat. Once the newly appointed expert committee submits its report, the court will further consider the issue.

The judgment will undoubtedly be remembered for its articulation of a new and distinct right to be free from the adverse effects of climate change. And this articulation certainly opens many doors for future legal, and possibly policy, exploration. However, to fully understand its potential significance requires unpacking this right, and possible interpretations of it, to which we turn for the remainder of this discussion.

Future climate litigation in India

As climate litigation begins to take roots in India, the newly articulated climate right is likely to provide the necessary impetus. The Indian judiciary, particularly the National Green Tribunal, will find itself on firmer ground to engage substantively with climate-based arguments.

Globally, the rights language is commonly used in climate litigation, but despite a rich rights-based jurisprudence, India has witnessed limited engagement with rights-based arguments in climate cases until now (Ghosh 2020). The *Ranjitsinh* judgment will open doors for that in India. The explicit articulation of the right to health being impacted by the changing climate, and the framing of the inability of certain communities to adapt to climate change and cope with its impacts as a violation of their right to equality will have precedential value – even though it could be argued that it forms part of the obiter dicta of the judgment, and is therefore not a binding precedent.

Cases against regulatory approvals for clearing forests to construct highways or for coal mining, or for hydro power projects in ecologically fragile regions like the Western Ghats or the Himalayas could increasingly rely on the *Ranjitsinh* formulation of a climate right and raise climate change-based arguments. This climate right will join ranks with other principles and rights fashioned by the Indian judiciary to deal with environmental cases – a legal toolbox frequently relied on by parties and the courts (Ghosh 2019).

But like many other rights, including those in the environmental context, that have been championed by the judiciary, the right to be free from the adverse effects of climate change as enunciated in this judgment risks becoming an empty promise. It is difficult to glean much guidance from the judgement on how this right is to be interpreted, who can claim it and against whom? In *Ranjitsinh*, the court's invocation of the right was to support infrastructure for the renewable energy sector. How far could this argument in favour of infrastructure for climate-related action go, and could it even lead to contradictory outcomes?

For example, it is at least conceivable that an emission-intensive industry (such as a thermal power plant) could claim that it helps people adapt to increasingly warm summers. Conversely, could the right, and the invocation of the necessity for emission limits, be used to argue for limiting new coal power plant development or accelerating closure of existing plants? Both are feasible.

In identifying an obligation on states to prioritise environmental protection and sustainable development, address the root causes of climate change, and safeguard the present and future generations, the court has put at least the primary onus on the state. But this obligation is so broadly defined that the failure to discharge it successfully will be hard to prove, not in the least because sustainable development as a concept is frequently used to justify developmental activities that are evidently harmful to the environment, but with perceived social and economic benefits, even by the judiciary (Chowdhury and Moosa 2024).

Exploring areas of omission

In articulating a right to be free from the adverse effects of climate change, the Supreme Court forcefully calls on states to "take effective measures to mitigate climate change and ensure that all individuals have the necessary capacity to adapt to the climate crisis," making it clear that they refer to both mitigation and adaptation. But, in what follows, there is far greater emphasis on mitigation through renewable energy than on adaptation.

Indeed, adaptation is the most thinly fleshed out part of the judgment. Yet, both are essential. Mitigation is needed because humanity cannot possibly adapt to very high temperatures; adaptation is required because we have already locked into some extent of warming.

Here we argue that *Ranjitsinh* carries two shortcomings. It underemphasises adaptation and ties the climate right closely to renewable energy, and it defines the scope of mitigation in relatively narrow ways to the exclusion of energy demand measures. Perhaps both reasonably derive from the narrow context for the judgement – renewable energy infrastructure – but they limit the extent to which the judgment can be viewed as a comprehensive and inclusive basis for an evolving Indian climate jurisprudence.

The court's articulation and treatment of the right to be free from the adverse impacts of climate change leaves some doubt as to how such a right can be realised without adequate attention to adaptation. Surely, to activate this right requires the state to make these communities more resilient, to prepare them for an uncertain future, and to help them adapt to what is already changing around them – weather patterns, agricultural productivity, accessibility of water, and so on? This includes pre-emptive resilience measures such as making India's growing cities less vulnerable to flooding, ensuring crop choices consider shifting temperature and rainfall conditions and pest prevalence, and avoiding constructing infrastructure in coastal areas subject to flooding and cyclones. It also includes anticipatory disaster risk reduction measures such as heat action plans (Pillai and Dalal 2023) and similar measures for flood, drought and fire.

> The judgment is a missed opportunity to flesh out legal arguments to bolster adaptive capacity and resilience in the country, an important area of jurisprudence so far untouched by Indian courts.

Indeed, while Article 21 has been the cornerstone of Indian environmental rights jurisprudence, *Ranjitsinh* rightly points to the salience of Article 14 on the right to equality as well to adaptation concerns, since different adaptation capacities across income classes and geographies suggest that climate change will impact communities unequally. By invoking Article 14, the court created elbow room to support measures to improve India's adaptive capacity to discourage those that will increase India's vulnerabilities, but chose not to pursue this line of argumentation. By contrast, the pivot to renewable energy finds no real basis in the Article 14 argument. Given this imbalance between adaptation and mitigation, there is a risk that *Ranjitsinh* will encourage a conflation of climate action with renewable energy promotion. The judgment is a missed opportunity to flesh out legal arguments to bolster adaptive capacity and resilience in the country, an important area of jurisprudence so far untouched by Indian courts.

Moreover, there is a conceptual flaw in relying on reducing emissions within India as the primary means of ensuring freedom from the adverse effects of climate change. Because these adverse effects are the aggregate result of emissions produced by all countries over time, and Indian emissions are about 6% of global annual emissions (as of 2016)[2] and about 4% in terms of their contribution to cumulative emissions (MOEFCC 2022), limiting Indian emissions alone will bring relatively modest gains. By contrast, adaptation and resilience-related actions entirely benefit Indian citizens, because they do not depend on what other countries do.

This does not mean, of course, that the Supreme Court is incorrect in highlighting India's responsibility to contribute to limiting emissions. But it is to do so in the context of the UNFCCC principle of 'common but differentiated responsibility and respective capabilities', which the court notes, and which recognises that climate change is a global collective action problem, but one that some countries have had more responsibility in causing than others. This understanding also informs why Indian climate policy has historically been substantially built around the idea of 'co-benefits' – that India will pursue options that bring both development and climate gains (Dubash et al. 2018). In practice, these concepts enable India to undertake mitigation action in a flexible way that is consistent with development objectives, while also prioritising adaptation. From this perspective, renewable energy is very important for India for both climate and development reasons, but it need not always and necessarily be the top priority.

By contrast, the phrasing of the *Ranjitsinh* judgment risks opening the door to arguments for an unconditional prioritisation of renewable energy. The court makes a compelling case for renewable energy and in particular solar power, noting it helps address climate change and also brings energy security, cleaner air, and economic opportunity. It notes the need for "prioritizing the transition to clean and sustainable energy sources" and argues that the 'importance of solar power cannot be overstated' even as it calls for balance across different objectives.

> The understandable focus of the judgment on infrastructure to support solar energy leads to a very limited framing of the mitigation challenge. It leaves out the demand side of the energy equation – how consumers and business use energy -- which is particularly important in a country like India…

As compelling as this case is, and we agree that the future of Indian energy must be renewable, it is also problematic to consider renewable energy to be an absolute imperative. For example, microhydro power, by risking destabilising hillsides, can exacerbate the effect of climate-induced rainwater run-off, and may even under-cut adaptive ability. The use of agropastoral land for solar parks can lead to disquiet in several affected communities, as their livelihoods are at stake and local ecology is affected.

This is not to argue against these renewable energy technologies. But instead of being absolute, decisions for and against renewable energy infrastructure will rest on balancing various considerations around climate mitigation, environmental quality, and social outcomes. Indeed, the court has argued for this idea of balance elsewhere in the judgment and it is important that the preponderant attention to renewable energy not obscure this larger idea of balance.

Finally, the understandable focus of the judgment on infrastructure to support solar energy leads to a very limited framing of the mitigation challenge. It leaves out the demand side of the energy equation – how consumers and business use energy – which is particularly important in a country like India, which is still locking-in future infrastructure and energy demand behaviours. Adequate attention to the demand side of energy now can enhance the speed of a transition to clean energy and obviate the need for more investment in supply later.

For example, improved urban planning, investing in public transport, sensible building design, and pursuing rail over road freight are all infrastructure measures that will help limit emissions. Infrastructure can also be supported by behavioural change, such as greater adoption of public transport. Both infrastructural and behavioural measures are particularly important in an Indian context where much infrastructure is yet to be built, and many behaviours are yet to be cemented. And considerable research exists to show that such demand approaches provide a large share of emission reduction opportunities and are often synergistic with sustainable development (IPCC 2023). For these reasons, to address the emissions limitation component of the right to be free from the adverse effects of climate change, a renewable energy focus is incomplete, and needs to be supplemented by attention to complementary demand approaches.

Given the context of the judgment, perhaps it is asking too much for the court to extend beyond broad statements of principle in areas such as adaptation, or wade into questions around sectoral energy demand. But the operationalisation of a right to be free from the adverse effects of climate change is incomplete without discussion of the implications of Article 14 for a focus on adaptive measures. And the absence of even cursory reference to energy demand as part of the mitigation challenge limits the extent to which *Ranjitsinh* can be read as a comprehensive conceptual template for future Indian climate law and policy. Using the prompts that are in the judgment, notably the reference to Article 14, to remedy these shortcomings should be an important next step in engaging with the judgment.

The challenge of operationalising a new climate right

Supreme Court judgments have enormous precedential value in Indian jurisprudence, more so when they relate to unchartered waters of emerging global issues. Read in this context, it is worth noting, and perhaps of some concern, that the judgment provides relatively little direction on how to operationalise the new right to be free from the adverse effects of climate change. Whose right does the court protect, under what sets of circumstances and which adverse effects will be prevented or limited by the judgment?

This may be because the complexity and the interlinked nature of the issues preclude clear guidance. For example, in operationalising this right, is it appropriate to privilege cooling through air conditioning for vulnerable populations that are unlikely to have contributed much to causing climate change, even if it increases emissions? Or should priority be given to minimising emissions even if some protections are denied to the poor? Should measures be enacted to safeguard delicate coastal and mountain ecosystems, which are often habitat for endangered species, because they provide climate adaptive functions such as buffering against storms or protecting against the impact of rainwater run-off? Or should these areas be aggressively deployed to harness wind and micro-hydro energy to accelerate a green energy transition? Simply articulating a right to be free from the adverse effects of climate change, but without further guidance, such as on accompanying principles, creates a conceptual vacuum that lacks useful direction for such choices.

The Supreme Court clearly recognises that such choices have no easy resolution. Perhaps for this reason the judgment is replete with recognition of interplay between competing demands – biodiversity and climate change; conservation, equity, prosperity, and climate change – and calls for balance across objectives such as conservation and sustainable development. Indeed, in the specific issue before it – the need to and feasibility of laying transmission lines underground – the court appointed an expert committee to advise it on this balance.

But the very act of appointing this committee underscores the challenge of operationalising a right to be free from the adverse effects of climate change: there is no unitary way to assess this balance between objectives such as conservation, development, and climate mitigation and adaptation across all issues. Instead, the balance will often be context dependent, drawing on expertise that lies outside the judiciary. Yet, surely the answer to operationalising this right cannot be to appoint an expert committee for each possible set of synergies and trade-offs across environment and development objectives?

It is important to recognise that the court has rendered a crucial service by articulating a right to be free from the adverse effects of climate change, by anchoring this in the language of human rights, and by pointing to the necessity to balance across objectives. But it is equally important to note that more clarity and further steps are required to operationalise this right. First, greater clarity on principles to inform decision-making in such complex cases, including some prioritisation across objectives, may, indeed, be required. For example, that clean energy transitions should be just and not impose costs on the poorest might be an important correlate to an emphasis on clean energy. Second, institutional machinery is required that assesses such synergies and trade-offs in an ongoing way and builds knowledge and institutional memory with which to inform such decisions in an ongoing manner.

Taking these steps, however, likely falls beyond the remit of the judiciary and within the scope of political decision-making through legislation. Both making hard normative choices across objectives and creating long-term institutions and linking them with existing government structures requires the sanction of democratic processes. *Ranjitsinh* may have cracked open a door, but to fully realise a right to be free from the adverse effects of climate change will require legislative action.

Conclusions

The *Ranjitsinh* judgment has created considerable space for the development of Indian climate jurisprudence. The Supreme Court's direct engagement with climate change, the mooring of its judgment in Article 14 and Article 21, and its embracing of the idea of seeking balance across diverse objectives, will enrich Indian climate jurisprudence. At the same time, the lack of clarity around what a right to be free from the adverse effects of climate change means in practice may limit the scope and impact of future litigation.

For these reasons, this judgment is less usefully read as an overarching legal framework for Indian climate law and policy. The predominant shortcoming is that while recognising the importance of adaptive capacity, the focus on renewable energy infrastructure suffuses the decision, providing little emphasis and less guidance on adaptation measures. In addition, it does not adequately frame the mitigation challenge beyond renewable energy alone. From this judgment, climate-related measures come uncomfortably close to being defined predominantly as renewable energy promotion alone.

Ultimately, the court notably calls for balance across objectives such as conservation, sustainable development, climate change and environmental protection. Yet, it does not offer overarching principles to inform this balance. Realising the full potential of the *Ranjitsinh* judgment, therefore, likely requires passage of encompassing climate legislation in India, that can develop these principles, and shape the institutions required for taking such balancing decisions on a regular basis.

We have laid out some ideas toward such legislation elsewhere (Dubash, Ghosh, and Pillai 2024; Dubash, Pillai, and Ghosh 2024). In brief, Indian climate legislation must provide guidance on how to balance across multiple environment, climate and development objectives, enable bottom-up anticipatory mitigation and adaptation action rather than seeking to regulate top-down, emphasise adaptation as much as mitigation, create deep institutional capacity, and work with the grain of Indian federalism.

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Footnotes:

1 The Court frequently uses the phrase 'right against the adverse impact of climate change' in the judgment, but when it declares that there is such a right, the formulation used is the 'right to be free from the adverse effects of climate change.' This is the formulation we use in the remainder of this paper.

2 Based on 2.8GT reported in India's Biennial Update Report as against 49.4GT global emissions (https://www.wri.org/data/world-greenhouse-gas-emissions-2016).

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