
CASE COMMENTARY: M.K. RANJITSINH & ORS. V. UNION OF INDIA

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Writ Petition (Civil) No. 838 of 2019 with Civil Appeal No. 3570 of 2022 2024 INSC 280 (Order dated 21 March 2024); 2025 INSC 1472 (Final Judgment dated 19 December 2025) Supreme Court of India.

Bench (Justice P.S. Narasimha and Justice A.S. Chandurkar).

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INTRODUCTION

In the 21st century, Environmental governance gradually facing a multilayered situation that any developmental strategies used to mitigate climate change often result in ecological harms that endangers fragile ecosystems and biodiversity. The judgment in M.K.Ranjitsinh & Ors. v. Union of India marks as a landmark judgment in the Indian environmental jurisprudence. In this verdict the Supreme Court of India addressed the constitutional conflict between renewable energy scaling and wildlife conservation, specifically regarding the gravely endangered Great Indian Bustard (GIB). This is the first time Supreme Court explicitly recognized “right against the adverse effects of climate change” as a fundamental right under Articles 14 and 21 of the Constitution of India. The court developed a jurisprudential framework to balance between the preservation and climate mitigation objectives, while modifying its own mandate sweeping underground transmission lines. However, the verdict raises significant priorities concerning ecological emphasis, judicial balancing, technocratic administration and precautionary environmental protections by establishing a framework that will regulate renewable energy development along with ecological conservation. This case comprises of four major judicial actions: an interim order in April 2021, a landmark judgment on 21 March 2024 (2024 INSC 280), subsequent proceedings in December 2025 after obtaining the Expert Committee's report, and a final verdict on 19 December 2025 (2025 INSC 1472). This commentary critically analyses the judgment in the dimension of climate justice and environmental constitutionalism.

FACTUAL BACKGROUND

The petition was filed under Article 32 of Constitution of India by most eminent wildlife conservationist M.K. Ranjitsinh seeking immediate judicial action for the protection of the Great Indian Bustard. The Great Indian Bustard (*Ardeotis nigriceps*) is one of the heaviest flying birds in the world. According to IUCN, the GIB is classified as critically endangered, with its population estimated to be between 50 and 249 individuals, mainly located in the arid grasslands of Rajasthan and Gujarat. The petitioners urged that the species declining due to pollution, climate change, loss of habitat, and man-made development activities. The overhead High-voltage transmission lines becomes a significant threat for the GIB habitats. Scientific studies shows that bird's limited frontal vision making it highly vulnerable to collisions with overhead transmission lines. The petitioner sought the temporary suspension on new power projects in vulnerable habitats, the bird diverters needs to be installed in the existing lines, and the overhead transmission lines should be converted to underground cables.

ISSUES

1. Whether overhead transmission lines violate the constitutional and statutory obligation to protect endangered species?
2. Whether the earlier direction mandating underground transmission lines was technically and economically feasible?
3. Whether renewable energy development can override biodiversity conservation?
4. Whether Article 21 includes a constitutional right against the adverse effects of climate change?

JUDGMENT

- In 19th April, 2021 the Supreme Court in an interim order imposed restrictions in setting up of overhead transmission lines in a larger area of 99,000sq.km and also appointed a three member committee to evaluate the practicability of laying High Voltage underground transmission lines. The court further said that the step to be taken to install bird diverters in the existing overhead transmission lines in the GIB priority and potential habitat and ordered their conversion into underground lines within a year. Within 6 months, the

respondents found that it was not feasible to cover the larger area as per the direction and it also significantly affected the solar and wind energy production potential in the region and thereby the respondents seeking the modification of the said interim order.

- The Union Government, through the Ministries of Environment, Forest and Climate Change, Power, and New and Renewable Energy, sought modification of the 2021 order on grounds of technical infeasibility and adverse implications for India's renewable energy targets and obligations under the Paris Agreement. The court recalled its interim order based on the ground that not technically feasible and also the underground cables may rise to environmental impacts on the vulnerable species and also results in forest fires. The laying of underground cables is 5 times more costly than the overhead transmission lines. Accordingly, the court recalled its injunction and directed to constituting an expert committee to evaluate the workability of underground transmission lines, the efficiency of bird diverters, and the number of diverters required, with a reporting deadline of July 31, 2024¹.
- The most fundamental aspect of the judgment lies in the climate justice & protection. The court held that climate change directly impacts floods, droughts, heat waves, sea level rise, decline in human health, Natural habitat, depletion of groundwater, loss of wildlife habitat. Thus, adverse climate impacts infringe Article 21's guarantee of life and personal liberty. The Court further connected climate vulnerability with Article 14 by observing that climate change disproportionately affects marginalized and economically vulnerable populations. Unequal exposure to environmental harms therefore violates substantive equality.
- In 19th December, 2025² the final judgment was passed. The Expert Committee conducted the field visit, evaluated ground concerns, consulted stakeholders and report submitted before the court. The key findings of the Judgment are the court revised priority areas where the renewable energy project in GIB sensitive areas and declared Revised Priority Areas are 14,013 sq. km. in Rajasthan and 740 sq. km. in Gujarat and the area outside the priority areas are termed as Potential Areas — broader zones that may still be relevant to GIB habitat but are not subject to the same level of restriction as the core zones, development restrictions imposed that new wind turbines and solar plants above 2kw not permitted in

¹ 2024 SCC OnLine SC 570

² 2025 INSC 1472

the Revised Priority Areas and the court suggested that in case that land allotted for the projects already then the developers can request alternative land from the State Government, the blanket approach was withdrawn and adopted a target model that is transmission corridor-based transmission. As per the recommendation of Expert Committee that undergrounding 250 of power lines in Rajasthan possess serious threat to GIB and it is not feasible. Further, the court directed that power lines must be re-routed outside the revised a designated power corridor. The court also considered that the Bird flight Diverters has unproven efficiency and maintenance concerns and not recommended as primary mitigation measure in the revised priority and potential areas and directed to further scientific assessment and evaluation of BFDs. The court designated the Ministry of Environment, Forest and Climate Change as central agency responsible for monitoring the measures. The court also urged for transformation of "Corporate Social Responsibility" into a broader forum by incorporating the environmental responsibility, private sectors holds responsible for ecological consequences of its infrastructure of its infrastructure development.

ANALYSIS

The ruling in *M.K. Ranjitsinh v. Union of India* represents a significant advancement in Indian environmental law, particularly with regard to the climate protection, renewable energy expansion with biodiversity conservation. The judgment has evolved in a various timeline to contribute. The significant transition in environmental jurisprudence that court recognized "Right against the adverse effects of climate change" as a constitutional right under Article 14 and 21 of constitution of India. I strongly believe that this will pave a way for drafting climate change rule and regulations in India to attain climate justice and also to contribute towards International Commitment. Initially, the court strictly passed an order on 2021 based on the eco-centrism and humility to protect the GIB's without sufficient technical consultation, and recalled the interim order as there was technical infeasibility and acknowledged it. The court has observed the significance of the sustainable development mandated installation of diverters along with the study. This is the case where judiciary had a balance approach with regard to protection of ecology and development but still the environmental development initiatives also have environmental degradation yet the judgment remained resolved in the tension between development and protection. The court suggested including environmental responsibility in corporate social responsibility which is a greater development in corporate law and ensuring

corporate responsibility towards environmental protection obligation and also to obtain financial resources for bird diverters and undergrounding of transmission lines. The court substantially relied on the expert committees report and the precautionary principle was relaxed based on the infrastructure. It is pertinent note that the court upholds the international obligations and similarly suggested the government to take necessary steps to reconcile the ecological integrity with economic interests. The verdict is a milestone in Indian environmental law, paving the way for a new right to protection from adverse effects of climate change that, in future litigations, will serve as an ultimate resource for resolving environmental concerns with consequences extending to climate change mitigation and safeguarding citizens' rights to a safe and healthy environment.

CONCLUSION

In this Contemporary era, this is the most significant case of intra-environmental conflict. The court recognized climate protection transforms it into a constitutional right while attempting to settle the difference in renewable energy expansion with bio diversity conservation. In my view, the court took an amicable way in settling the issue by approaching a balancing model with negotiating between development and environment but it still softens its precautionary principle over infrastructure infeasibility, cost effectiveness and national renewable energy actions. This approach may become the future framework for environmental adjudication in India. The decision in *M.K.Ranjitsinh &Ors v. Union of India* marks the evolution of Indian environmental jurisprudence from precautionary environmentalism to constitutional climate balancing, where courts increasingly prioritize ecological proportionality over absolute conservation.