

RECONCILING THE RIGHT TO DEVELOPMENT WITH ECOLOGICAL DEBT: CONSTITUTIONAL ECONOMICS OF CLIMATE GOVERNANCE IN INDIA (SDG 11 & SDG 13)

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*Abstract: Rapid industrial and urban expansion in emerging economies has intensified the tension between economic development and environmental protection. While global frameworks such as the Sustainable Development Goals emphasize sustainability, constitutional governance has often treated development and ecological protection as competing priorities. However, recent judicial developments in India between 2024 and 2026 suggest a gradual shift in this understanding. The Supreme Court of India has increasingly emphasized that ecological stability is not merely an environmental concern but a necessary condition for sustainable economic development. This paper examines this shift through the lens of constitutional economics, analyzing how environmental costs are beginning to be internalized within the constitutional interpretation of the Right to Development. Drawing on recent decisions such as *M.K. Ranjitsinh v. Union of India* and the 2026 Sangrur Cement litigation, the paper identifies three emerging trends: the recognition of climate stability as essential for protecting life and dignity under Article 21, aligning with SDG 13 (Climate Action); increasing judicial scrutiny of environmentally destructive forms of “mal-development” affecting urban ecosystems relevant to SDG 11 (Sustainable Cities and Communities); and the growing recognition of ecological debt and intergenerational equity in constitutional reasoning. The paper argues that these developments indicate a gradual transition from an extractive model of development toward a constitutional framework that integrates economic growth with long-term ecological sustainability. This paper contributes to debates on sustainable development by linking constitutional jurisprudence with environmental economics. By introducing the concept of ecological debt into the analysis of the Right to Development, the study demonstrates how recent Indian Supreme Court decisions are beginning to internalize environmental costs within constitutional governance. The paper further connects these developments with the policy objectives of SDG 11 and SDG 13, offering a framework for integrating sustainability considerations into constitutional decision-making.*

Keywords: *Constitutional Economics, Ecological Debt, Sustainable Development, Environmental Governance, Article 21, Eco-centric Jurisprudence, MK Ranjitsinh, Sangrur Verdict, Public Trust Doctrine, Mal-development.*

I. INTRODUCTION

The tension between economic development and environmental protection has long occupied a central place in Indian constitutional jurisprudence. In the decades following independence, development was widely understood as a constitutional necessity, embedded within the transformative aspirations of the Preamble and the Directive Principles of State Policy. Industrialization, infrastructure expansion, and economic growth were viewed as essential instruments for poverty alleviation and national progress. Within this framework, environmental degradation was frequently treated as an externalized cost of development, reflecting what economists describe as a form of market failure in which ecological harms remain unaccounted for in economic decision-making.¹

The constitutional text itself reflects this layered historical evolution. Article 21 guarantees that no person shall be deprived of life or personal liberty except according to procedure established by law.² The Constitution (Forty-Second Amendment) Act, 1976 further introduced Article 48A, directing the State to protect and improve the environment, and Article 51A(g), imposing a fundamental duty upon citizens to safeguard natural resources.³ Although these provisions were initially considered non-justiciable, the Supreme Court gradually expanded the scope of Article 21 to include the right to a wholesome environment, thereby transforming environmental protection into a constitutional concern.⁴ However, the period between 2024 and 2026 marks an important doctrinal development in this jurisprudence. Rather than merely safeguarding environmental quality, the Supreme Court has increasingly begun to articulate environmental

1 Granville Austin, *The Indian Constitution: Cornerstone of a Nation* 50–55 (Oxford Univ. Press 1966).

2 INDIA CONST. art. 21.

3 The Constitution (Forty-Second Amendment) Act, 1976, §§ 10–11.

4 *Subhash Kumar v. State of Bihar*, (1991) 1 S.C.C. 598 (India).

integrity as intrinsic to constitutional survival and sustainable economic governance. The recognition in *M.K. Ranjitsinh v. Union of India* of a right to be free from the adverse effects of climate change represents a significant turning point in this regard.⁵ Subsequent rulings, particularly in the Sangrur Cement litigation, suggest that certain ecological thresholds cannot be compromised even in pursuit of economic growth.⁶

This emerging judicial reasoning reflects what may be described as a constitutional macroeconomic shift, in which courts are beginning to internalize environmental costs that were historically externalized within development policy. Drawing normative support from international environmental instruments such as the Stockholm Declaration (1972) and the Rio Declaration (1992), Indian constitutional jurisprudence increasingly frames environmental integrity as a non-negotiable baseline for the protection of life under Article 21.⁷ This evolving approach also resonates with the broader sustainability objectives reflected in Sustainable Development Goal 11 (Sustainable Cities and Communities) and Sustainable Development Goal 13 (Climate Action), which emphasize the integration of ecological resilience into development planning.⁸

This article contends that these developments signal a jurisprudential transition from anthropocentric models of sustainability toward an eco-centric constitutional framework. In this evolving paradigm, development is not rejected; rather, it is constitutionally structured through ecological limits and the emerging concept of **ecological debt**, ensuring that economic growth does not undermine long-term environmental stability or intergenerational justice.⁹

The remainder of this article proceeds as follows. Part II examines the evolution of environmental rights within Indian constitutional jurisprudence, particularly the expansion of Article 21 to include environmental protection. Part III analyzes recent judicial developments between 2024 and 2026, with particular emphasis on *M.K. Ranjitsinh v. Union of India* and the Sangrur Cement litigation. Part IV situates these developments within the broader framework of international environmental law and sustainable development principles, including the Stockholm and Rio Declarations. Part V explores the emerging concept of **ecological debt and intergenerational equity** in constitutional decision-making. Finally, Part VI concludes by assessing the implications of this jurisprudential shift for the future of sustainable development and environmental governance in India.

1.2 THE EVOLUTION OF ENVIRONMENTAL RIGHTS UNDER ARTICLE 21

The Supreme Court's environmental jurisprudence emerged prominently in the 1980s through the mechanism of public interest litigation, which enabled courts to address environmental harms affecting large sections of society. In *Subhash Kumar v. State of Bihar*, the Court recognized that the right to life under Article 21 includes the right to enjoy pollution-free water and air, thereby establishing a direct constitutional connection between environmental protection and human dignity.¹⁰ Around the same period, in *M.C. Mehta v. Union of India* (Oleum Gas Leak case), the Court developed the doctrine of **absolute liability** for hazardous industries, holding that enterprises engaged in inherently dangerous activities must bear the responsibility for environmental harm caused by their operations.¹¹

The Court further strengthened environmental governance through the articulation of the **Public Trust Doctrine** in *M.C. Mehta v. Kamal Nath*, affirming that natural resources such as forests, rivers, and air are held by the State in trust for the public and cannot be transferred for private exploitation in ways that undermine ecological balance.¹² Collectively, these decisions transformed environmental protection from a matter of administrative regulation into a constitutional obligation rooted in the protection of life and public welfare.

Initially, however, the Court approached environmental disputes through a **balancing framework**, attempting to

⁵ *M.K. Ranjitsinh v. Union of India*, 2024 S.C.C. OnLine SC 312

⁶ *Harbinder Singh Sekhon v. State of Punjab*, Civil Appeal (S.C. Feb. 13, 2026).

⁷ United Nations Conference on the Human Environment, **Stockholm Declaration**, U.N. Doc. A/CONF.48/14 (1972); United Nations Conference on Environment and Development, **Rio Declaration on Environment and Development**, U.N. Doc. A/CONF.151/26 (1992).

⁸ United Nations, **Transforming Our World: The 2030 Agenda for Sustainable Development**, G.A. Res. 70/1 (2015).

⁹ Edith Brown Weiss, *In Fairness to Future Generations: International Law, Common Patrimony, and Intergenerational Equity* (1989)

¹⁰ *Subhash Kumar v. State of Bihar*, (1991) 1 S.C.C. 598 (India).

¹¹ *M.C. Mehta v. Union of India*, (1987) 1 S.C.C. 395.

¹² *M.C. Mehta v. Kamal Nath*, (1997) 1 S.C.C. 388.

reconcile the demands of economic development with the need for ecological protection. Developmental projects were often permitted subject to mitigation measures, regulatory oversight, and compensation for environmental damage. The doctrine of **sustainable development**, endorsed in *Vellore Citizens' Welfare Forum v. Union of India*, became the normative bridge between economic growth and environmental protection.¹³ In that case, the Court formally incorporated the **precautionary principle** and the **polluter pays principle** into Indian environmental jurisprudence, recognizing them as essential components of sustainable development.

From the perspective of environmental economics, these doctrines represented an early judicial effort to **internalize environmental externalities**, ensuring that the environmental costs of industrial activity are reflected in development decisions rather than imposed on society at large. By requiring polluters to bear the financial consequences of environmental damage, the Court sought to align legal accountability with the economic principle that environmental harms should not remain externalized from development policy.

However, the traditional balancing model presupposed a degree of equivalence between economic growth and environmental protection as competing policy objectives. By the mid-2020s, judicial reasoning increasingly began to question this symmetry. The growing realities of climate change, biodiversity loss, and cumulative ecological degradation demonstrated that certain environmental harms are irreversible and therefore incapable of meaningful compensation after the fact. Consequently, the Court's language began to evolve from the earlier notion of a "wholesome environment" toward the stronger concept of **environmental integrity**, reflecting recognition that ecological systems themselves are foundational to the survival of human life and constitutional governance.

1.3 ENVIRONMENTAL INTEGRITY AS A NON-DEROGABLE CONSTITUTIONAL BASELINE

A significant development in contemporary environmental jurisprudence emerged in *M.K. Ranjitsinh v. Union of India*, where the Supreme Court addressed the protection of the critically endangered Great Indian Bustard in the context of renewable energy transmission infrastructure.¹⁴ While acknowledging the importance of renewable energy expansion for addressing climate change, the Court emphasized that biodiversity protection forms an integral component of constitutional environmental duties. In doing so, the Court recognized that citizens possess a **right to be free from the adverse effects of climate change** as part of the guarantee of life and personal liberty under Article 21.¹⁵

This articulation represents an important doctrinal shift. Environmental harm is no longer understood merely as regulatory non-compliance or administrative failure; rather, it is treated as a potential violation of fundamental rights. The concept of **environmental integrity** introduced in this context implies the preservation of ecological systems in a functional and sustainable state, recognizing that environmental degradation directly threatens the conditions necessary for human survival and social stability.

From an environmental economic perspective, this reasoning reflects a transition from traditional models of development that **externalized environmental costs** toward a constitutional framework that increasingly seeks to **internalize ecological limits within development policy**. Instead of treating environmental protection as a secondary regulatory concern, the Court's approach suggests that ecological stability constitutes a structural prerequisite for sustainable economic governance.

The doctrine of **non-negotiable ecological baselines** emerges from this reasoning. Under this approach, developmental activities that threaten to cross critical ecological thresholds—such as large-scale deforestation, destruction of wetlands, biodiversity loss, or depletion of groundwater resources—cannot be justified solely on the basis of economic gains. Constitutional permissibility becomes contingent upon maintaining ecological sustainability and safeguarding the life-supporting systems upon which society depends.

This evolving approach reflects a deeper transformation in constitutional reasoning. Rather than attempting to balance development and environmental protection as equivalent policy choices, the Court increasingly frames environmental integrity as a **foundational condition for the realization of fundamental rights**. In doing so, contemporary environmental jurisprudence moves beyond anthropocentric notions of environmental protection toward a more **eco-centric constitutional framework**, where the preservation of ecological systems becomes essential to the protection of

13 *Vellore Citizens' Welfare Forum v. Union of India*. (1996) 5 S.C.C. 647.

14 *M.K. Ranjitsinh v. Union of India*. 2024 S.C.C. OnLine SC 312.

15 *Id.*

life, dignity, and intergenerational justice.

1.4 THE SANGRUR CEMENT VERDICT AND THE DOCTRINE OF MAL-DEVELOPMENT

The jurisprudential shift toward ecological constitutionalism became particularly visible in the 2026 litigation concerning industrial land reclassification in Punjab, commonly referred to as the **Sangrur Cement case**. In this dispute, the State attempted to permit industrial activity in areas previously restricted under urban and environmental planning regulations. The Supreme Court invalidated the administrative reclassification, holding that regulatory changes cannot dilute environmental safeguards merely to facilitate economic activity.¹⁶

The Court emphasized that development policies must remain consistent with constitutional obligations under Articles 14 and 21, particularly where environmental degradation threatens the health, livelihood, and ecological security of affected communities. By rejecting the State's attempt to justify industrial expansion on the grounds of economic necessity, the Court reinforced the principle that environmental protection cannot be subordinated to short-term developmental gains.

In articulating its reasoning, the Court implicitly distinguished between **sustainable development** and what may be described as **mal-development**—developmental activities that generate immediate economic benefits while imposing irreversible ecological costs. Such projects often involve the depletion of forests, contamination of water resources, destruction of wetlands, or degradation of biodiversity. While these activities may contribute to short-term economic growth, they simultaneously undermine the ecological systems upon which long-term social and economic stability depend.

From the perspective of environmental economics, mal-development represents a form of **unsustainable extraction of natural capital**, where environmental costs are externalized and transferred to society at large. The Court's reasoning in the Sangrur litigation reflects an emerging recognition that development decisions must account for these long-term ecological costs rather than treating environmental degradation as a tolerable by-product of industrial expansion.

The judgment also highlights the distributive dimensions of environmental harm. By linking ecological degradation with Article 14, the Court framed environmental injustice as a form of constitutional inequality. Marginalized communities, particularly those dependent on natural resources for livelihood, often bear a disproportionate share of environmental burdens created by development projects. In this sense, environmentally destructive development may produce not only ecological damage but also **structural inequality in the distribution of environmental risks and benefits**.

This reasoning aligns closely with the concept of **ecological debt**, which refers to the environmental liabilities generated when current development activities exceed ecological carrying capacity and transfer environmental costs to future generations. By recognizing that such developmental choices impose long-term ecological burdens on society, the Court's approach strengthens the constitutional commitment to **intergenerational equity**, ensuring that the pursuit of present economic gains does not undermine the environmental rights of future citizens.

1.5 INTERNATIONAL ENVIRONMENTAL HUMAN-RIGHTS FRAMEWORK

Indian environmental jurisprudence does not evolve in isolation but is deeply influenced by developments in international environmental law and global sustainability governance. Over the past several decades, international legal instruments have increasingly emphasized the close relationship between environmental protection, human rights, and sustainable development. These frameworks have provided important normative guidance for constitutional interpretation within domestic legal systems.

A notable development in this regard is the adoption of the **United Nations General Assembly Resolution recognizing the right to a clean, healthy, and sustainable environment** in 2022.¹⁷ Although such resolutions are not legally binding, they serve as important interpretive tools for national courts seeking to align constitutional protections with evolving international human-rights norms. By affirming environmental quality as a fundamental human right, the resolution reinforces the constitutional interpretation of Article 21 as encompassing environmental protection and ecological stability.

¹⁶ *Harbinder Singh Sekhon v. State of Punjab*, Civil Appeal (Supreme Court of India Feb. 13, 2026).

¹⁷ G.A. Res. 76/300, **The Human Right to a Clean, Healthy and Sustainable Environment** (July 28, 2022).

Earlier international frameworks had already laid the intellectual foundations for this approach. The **Stockholm Declaration on the Human Environment (1972)** established the principle that human beings have a fundamental right to conditions of life that permit dignity and well-being in an environment of quality.¹⁸ This principle was further elaborated in the **Rio Declaration on Environment and Development (1992)**, which introduced the concept of sustainable development and emphasized that environmental protection must form an integral part of the development process rather than being treated as a separate policy concern.¹⁹

These principles have significant implications from the perspective of environmental economics. By emphasizing the integration of environmental protection within development policy, international environmental frameworks encourage states to account for ecological limits and the long-term value of natural capital. This approach aligns closely with the idea that development policies must internalize environmental costs rather than treating ecological degradation as an externalized by-product of economic growth. Furthermore, these international commitments resonate with the policy objectives reflected in the **United Nations Sustainable Development Goals**, particularly **SDG 11 (Sustainable Cities and Communities)** and **SDG 13 (Climate Action)**. These goals emphasize the need to integrate environmental resilience, climate adaptation, and sustainable resource management into urban planning and economic development strategies. By drawing upon these international norms, Indian courts increasingly situate constitutional environmental protection within a broader global framework of sustainable development and climate governance. The incorporation of these principles into constitutional reasoning strengthens the emerging jurisprudence that treats environmental integrity not merely as a regulatory objective but as a **structural requirement for sustainable economic and social development**.

1.5 PUBLIC TRUST DOCTRINE IN THE CLIMATE ERA

The **Public Trust Doctrine** has long been recognized as a foundational principle in Indian environmental jurisprudence. Rooted in Roman law and later incorporated into common law traditions, the doctrine establishes that certain natural resources—such as air, water, forests, and ecological systems—are held by the State in trust for the benefit of the public and cannot be alienated for purely private interests. The Supreme Court formally incorporated this doctrine into Indian constitutional law in *M.C. Mehta v. Kamal Nath*, where it held that the State acts as a trustee of natural resources and must protect them for public use and ecological sustainability.²⁰

In recent years, however, the scope of the Public Trust Doctrine has begun to expand in response to the challenges posed by climate change and rapid urbanization. Ecologically sensitive areas such as wetlands, floodplains, and urban green spaces are increasingly recognized as essential components of climate resilience. These ecosystems function as natural infrastructure, absorbing floodwaters, regulating urban temperatures, preserving biodiversity, and maintaining ecological balance.

From the perspective of environmental economics, the degradation of such ecosystems represents a depletion of **natural capital**, the long-term ecological assets upon which social and economic stability depend. When development projects convert wetlands, forests, or river ecosystems into industrial or commercial zones, the immediate economic benefits often obscure the long-term environmental costs borne by society. These costs include increased vulnerability to climate disasters, loss of ecosystem services, and heightened environmental risks for surrounding communities.

Judicial enforcement of the Public Trust Doctrine therefore serves an important constitutional function in preventing the unsustainable transfer of ecological resources into private exploitation. By requiring the State to preserve critical ecological systems for public benefit, the doctrine helps ensure that development policies do not generate excessive **ecological debt** that would burden future generations.

In the context of contemporary climate governance, the Public Trust Doctrine thus evolves beyond its traditional role as a principle of resource protection and emerges as a mechanism for safeguarding ecological resilience. By recognizing environmental resources as public trust assets, courts reinforce the constitutional principle that environmental sustainability is a prerequisite for both democratic governance and long-term economic stability.

¹⁸ United Nations Conference on the Human Environment, **Stockholm Declaration**, U.N. Doc. A/CONF.48/14 (1972).

¹⁹ United Nations Conference on Environment and Development, **Rio Declaration on Environment and Development**, U.N. Doc. A/CONF.151/26 (1992).

²⁰ *M.C. Mehta v. Kamal Nath*, (1997) 1 S.C.C. 388 (India).

VII. INTERGENERATIONAL EQUITY AND ECOLOGICAL DEBT

The principle of **intergenerational equity** has long occupied an important place in international environmental law and sustainability discourse. At its core, the concept recognizes that the present generation holds environmental resources in trust not only for itself but also for future generations. This principle requires that development policies today must not compromise the ability of future societies to meet their own environmental and economic needs.²¹

In environmental jurisprudence, intergenerational equity functions as a normative constraint on short-term developmental decision-making. Courts increasingly recognize that environmental degradation often produces long-term consequences that extend far beyond the temporal scope of present economic gains. Activities such as deforestation, groundwater depletion, biodiversity loss, and large-scale industrial pollution may generate immediate economic benefits but simultaneously undermine the ecological systems upon which future generations depend.

Within this context, the concept of **ecological debt** provides a useful analytical framework for understanding the long-term implications of environmentally destructive development. Ecological debt refers to the accumulated environmental liabilities that arise when development activities exceed ecological carrying capacity and deplete natural capital faster than it can regenerate. In such circumstances, the environmental costs of present development are effectively transferred to future generations, creating a form of intergenerational injustice.

From an environmental economic perspective, ecological debt reflects the failure of conventional development models to adequately account for the long-term value of ecosystem services and natural capital. When environmental resources are exploited without incorporating their ecological costs into economic decision-making, development policies create hidden liabilities that manifest in the form of climate instability, biodiversity collapse, and resource scarcity.

Indian constitutional jurisprudence increasingly reflects awareness of these long-term ecological implications. By emphasizing environmental integrity and sustainable development within the interpretation of Article 21, courts have begun to recognize that constitutional protections must extend beyond immediate environmental harm to include the preservation of ecological systems necessary for the well-being of future citizens. In this sense, the constitutional commitment to life and dignity implicitly incorporates an obligation to prevent the accumulation of unsustainable ecological debt.

Judicial recognition of intergenerational equity therefore reinforces the emerging eco-centric orientation of constitutional environmental law. By acknowledging that development decisions must respect ecological limits and preserve environmental resources for future generations, courts help ensure that economic progress does not undermine the long-term sustainability of society. In doing so, constitutional jurisprudence begins to integrate the principles of **environmental justice, sustainability economics, and intergenerational responsibility** into the governance of development policy.

VIII. SEPARATION OF POWERS AND INSTITUTIONAL CONCERNS

The expansion of environmental rights and the emergence of eco-centric constitutional reasoning have also generated important institutional debates regarding the appropriate role of courts in environmental governance.²² Critics argue that an increasingly interventionist judiciary risks encroaching upon the domains traditionally reserved for the legislative and executive branches of government. Development policy, infrastructure planning, and industrial regulation typically involve complex economic considerations and technical expertise, which are often better addressed through democratic and administrative processes rather than judicial adjudication.

From this perspective, the growing judicial emphasis on ecological limits and environmental integrity may appear to blur the institutional boundaries between constitutional review and policy-making. Decisions concerning industrial licensing, environmental clearances, and urban planning frequently require balancing competing economic, social, and environmental interests. Excessive judicial intervention in such matters may raise concerns about democratic legitimacy and institutional competence.

However, these concerns must be understood within the broader constitutional framework in which courts are entrusted with safeguarding fundamental rights. Where environmental degradation threatens the enjoyment of life, health, and livelihood, judicial review becomes an essential mechanism for ensuring constitutional accountability. Environmental

21 Edith Brown Weiss, *In Fairness to Future Generations: International Law, Common Patrimony, and Intergenerational Equity* (United Nations Univ. Press 1989).

22 *M.C. Mehta v. Union of India*, (1987) 1 S.C.C. 395 (India).

harms often involve **collective risks and long-term consequences** that may not be adequately addressed through conventional political processes, particularly when economic incentives favor short-term development gains.

In this context, judicial intervention does not necessarily represent an intrusion into policy-making but rather an effort to ensure that development policies remain consistent with constitutional guarantees. By articulating ecological baselines and reinforcing environmental rights, courts help establish normative limits within which legislative and executive authorities must operate.

At the same time, effective environmental governance requires institutional cooperation rather than judicial dominance. Courts increasingly rely on expert committees, scientific assessments, and environmental regulatory bodies to evaluate complex ecological questions. Such collaborative mechanisms help reconcile constitutional oversight with the technical expertise necessary for sound environmental decision-making.

Ultimately, the challenge lies in developing a **balanced institutional framework** in which courts provide constitutional guidance while allowing democratic institutions sufficient flexibility to design and implement sustainable development policies. When properly calibrated, this interaction between judicial review, legislative action, and administrative regulation can strengthen the overall architecture of environmental governance while preserving the constitutional commitment to ecological sustainability.

IX. COMPARATIVE CONSTITUTIONAL PERSPECTIVES

Recent developments in Indian environmental jurisprudence reflect a broader global movement toward recognizing ecological protection as a constitutional imperative. Constitutional courts in several jurisdictions have begun to interpret environmental protection and climate stability as essential components of fundamental rights. A notable example is the **German Federal Constitutional Court's 2021 climate decision**, which held that insufficient climate regulation today may disproportionately restrict the freedoms of future generations, thereby violating constitutional guarantees.²³

Similarly, the **Colombian Constitutional Court**, in its landmark decision concerning the protection of the Amazon rainforest, recognized the ecosystem as a subject of legal protection and emphasized the State's obligation to safeguard environmental resources for present and future generations.²⁴

These decisions illustrate an emerging trend of **climate constitutionalism**, where courts increasingly frame environmental sustainability as a prerequisite for the effective enjoyment of constitutional rights. India's evolving jurisprudence on environmental integrity and ecological limits thus aligns with this broader global transformation in constitutional environmental governance.

X. CONCLUSION

The evolution of Indian environmental jurisprudence reflects a significant transformation in the constitutional understanding of development. For much of the post-independence period, economic growth and industrial expansion were treated as overriding policy priorities, while environmental degradation was often viewed as an inevitable by-product of development. However, recent judicial developments between 2024 and 2026 indicate a gradual shift in this paradigm. The Supreme Court has increasingly emphasized that environmental integrity is not merely a regulatory concern but a constitutional prerequisite for the protection of life, dignity, and equality under Articles 21 and 14.

Through decisions such as *M.K. Ranjitsinh v. Union of India* and the Sangrur Cement litigation, the Court has begun to articulate ecological limits on development, recognizing that environmentally destructive projects may generate long-term ecological liabilities for society. In doing so, contemporary jurisprudence moves toward an eco-centric constitutional framework that acknowledges the importance of **intergenerational equity, ecological sustainability, and the responsible use of natural capital**.

This shift also reflects a broader alignment with international environmental principles and the policy objectives embodied in **Sustainable Development Goals 11 and 13**. Ultimately, the emerging constitutional approach suggests that development in the twenty-first century cannot be pursued through extractive growth models alone but must instead be structured within ecological limits that ensure both economic progress and long-term environmental stability.

²³ Bundesverfassungsgericht [BVerfG] [Federal Constitutional Court], Mar. 24, 2021, 1 BvR 2656/18 (Ger.).

²⁴ Corte Constitucional [C.C.] [Constitutional Court], Apr. 5, 2018, Sentencia STC4360-2018 (Colom.)