



THE CONUNDRUM OVER AAREY FOREST: A CASE STUDY

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ABSTRACT: The Aarey is back in the spotlight, as the fight to preserve this green space in the heart of Mumbai continues. The conundrum lying before the area is – either choose to save the ecosystem or go for the development. This dispute has resulted in a long legal battle between the environmental activists and the government, which is still going on.

Keywords – Aarey Forest, metro shed, Mumbai, transplantation.

1. INTRODUCTION

"What we are doing to the forests of the world is but a mirror reflection of what we are doing to ourselves and to one another."

Chris Maser

What all the forests of the world are being subjected to in the name of development, the same is happening to the Aarey Forest. But the destruction of this particular forest, located in the northern suburb of Goregaon near Sanjay Gandhi National Park, Mumbai, is different as it also has a political controversy attached to it.

The crux of the battle between the government and environmentalists revolves around the construction of the proposed Mumbai Metro shed project on the land of Aarey Forest.

On one hand, the government says that in order to make the metro shed, it is compulsory to cut down the forest because they have no other option. On the other hand, a lot of protesters and citizens say that it isn't necessary to cut down the forest to make the metro sheds. In the backdrop of this, it is necessary to analyse the arguments from both the sides.

Although the protests have been ongoing for a long time to save the Aarey Forest ever since the proposal to cut down the trees in order to construct a metro shed was put up for the first time because the Aarey Forest is one of the 'last remaining Green Lungs' of Mumbai – one of the most polluted cities of the world, but the final decision on the matter was taken by Mumbai's Tree Authority on 30th August, 2019 which falls under

the ambit of Brihanmumbai Municipal Corporation (BMC). They decided upon cutting down the trees to build the metro shed at the same place (as per the earlier plan). Their final decision stated that out of 4 lakhs trees in the Aarey Forest, they would fell 2,646 trees, out of which 2,185 would be actually cut down and the remaining 461 trees would be transplanted¹. As compensation, they said that they would grow three times the number of trees at some other place. Four of the members of the Tree Authority, that took this final decision, belonged to the BJP who agreed upon the felling of the trees. One member who belonged to the NCP also supported this. There were three independent experts who also agreed upon this. These independent experts were also the environmentalists who had indulged in a lot of environmental activism in the past. The Congress members staged a walkout and refrained from voting. Shiv Sena was the sole party to vote against the felling of trees.²

It all sounds too perfect. Only a few trees are being axed – 2000 out of 4 lakhs! The shed is being made for the metro, which in turn, is going to be so beneficial. People would start using the metro instead of their own vehicles, it would result in so much less pollution overall. Also, they would be transplanting so many trees, growing so many more of them in place of uprooted ones. And since no other place is available to them, let them do it. Even the independent environmentalists supported them. So, where lies the problem?

The truth of the matter was that, independent experts revealed, when the votes were being cast in the meeting of the Tree Authority, a lot of confusion reigned that they couldn't figure out when the other members accepted their votes as 'yes'. So, the independent experts state that their votes of 'yes' to the axing of trees, were deliberately misconstrued.³

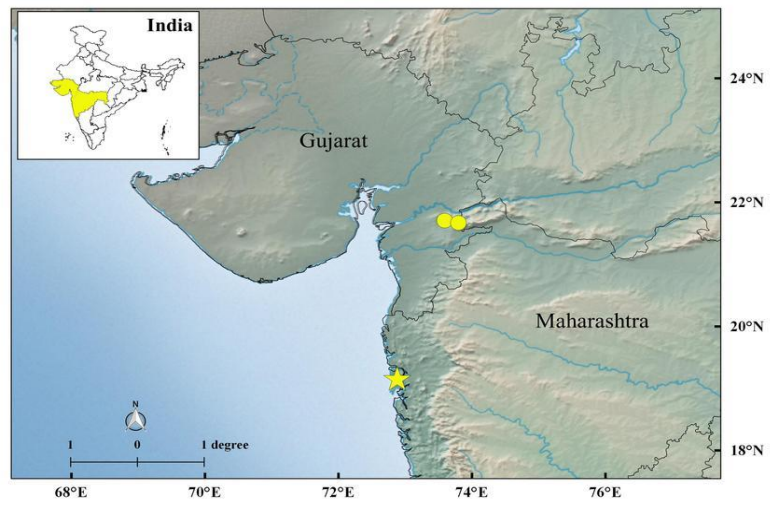
This matter is not just about a few trees but much more than that. The same shall be discussed here.

¹ Move To Remove 2646 Trees From Aarey Forest: Bombay HC Directs MCGM And MMRCL To File Reply [Read Petition], available at <https://www.livelaw.in/news-updates/resolution-to-remove-2646-trees-aarey-147763> (Last Modified September 4, 2019)

² "Maharashtra's Controversial Aarey Forest Project, Why Is It Resurfacing Time And Again?" *Outlook*, Sep 30, 2022

³ Richa Pinto, "Two experts who voted for axing trees in Mumbai's Aarey Colony quit" *The Times Of India*, Sep 1, 2019

2. STUDY AREA



Coordinates of Aarey Forest

Latitude - 19.1510° N

Longitude - 72.911° E

Aarey Colony

3. METHODOLOGY

This study is based on the secondary data collected from the authentic government sites like the Forest Survey of India, Municipal Corporation of Greater Mumbai, international studies by NASA and FAO, newspapers like The Hindu, The Indian Express, research paper on the flora and fauna of Aarey Forest, websites related to law like Live Law and other websites like The Print, Down to Earth, The Week.

4. REVIEW OF LITERATURE

Aarey Milk Colony, Mumbai as Forest Territory - A Status Report by Shinde Rajendra, Xplore – The Xavier's Research Journal, Vol 8, Issue 3, 2017

The research paper talks about the flora and fauna of Aarey Milk Colony in detail in order to verify whether Aarey Forest falls within the category of forest. The researcher based his research on the literature and field survey. The satellite images were also studied. It also describes the environmental benefits provided by the area. The data and names of existing as well as new species found in the area are also cited in the paper. Based upon the data collected, the researcher came to the conclusion that Aarey Milk Colony is an eco sensitive zone. Hence, the researcher urged to save the forest citing the rising pollution level of Mumbai causing health related problems.

This research paper proved to be very useful for analysing the flora and fauna of Aarey Forest very deeply. The information about new species discovered in the area has been taken from this paper. The paper also provided the data related to variety of plants present in the area along with the conditions in which such plants grow and survive. It also helped in proving the fact about leopard citing and human – leopard conflict very often in the forest.

5. BACKGROUND

An entire ecosystem

Spread over 1,800 acres, the Aarey Forest is a complete ecosystem. Besides being a home of around 86 species of trees, it is also a wildlife corridor. A variety of endangered animals exist in this forest. Five species of Aarey Forest that are on International Union for Conservation of Nature's Red List of Threatened Species are Leopard, Sambar deer, Rusty spotted cat, Alexandrine Parakeet and Red – wattleed lapwing. Leopard sighting is very often in Aarey. The drains in the forest are home to native species of fish, crabs, shrimps and Checkered Keelback water snakes that are protected under the Wildlife Protection Act, 1972. A total of 34 species of wildflowers, 86 species of butterflies, 13 species of amphibians, 46 species of reptiles and 16 species of mammals exist here.⁴ It is also considered to be a biotope that provides shelter to many new-to-science species. For instance, a new species of Trapdoor Spider (*Idiopus rubrolimbatus*), Tarantula (*Heterophriectus aaeeyensis*) and Scorpion (*Lychas aareyensis*) were discovered here. What is more startling, is that the species thought to have been extinct have been rediscovered from Aarey, like Tarantula (*Haploclostus validus*) found after 110 years, the Trapdoor Spider (*Idiops bombayensis*) found after 110 years and another tarantula (*Plesiophriectus millardi*) rediscovered after 100 years. The residents also share the space with Adivasis who live in 27 hamlets throughout the forest.⁵

Also, the site where the metro shed would be constructed is the floodplain of Methi River and the importance of floodplains cannot be ignored especially in the present time when heavy floods have become a normal scenario during every rainy season. If any kind of construction activity is undertaken on a floodplain, it would mean whenever it rains excessively, the chances of flooding increase and Mumbai is already grappling with flooding issues.

Aarey Milk Colony

Since the 1950s, the government began carving out sections of the Aarey Forest for varying purposes, starting with the Aarey Milk Colony. In 1949, 1,300 acres were allotted to the city's Dairy Development Board in order to create a separate settlement for dairy farmers.⁶ This idea was propounded by the then Bombay milk commissioner Dara Nusserwanji Khurody, who later received the Ramon Magsaysay Award along with Verghese Kurien in 1963 for Community Leadership. This colony was later inaugurated by the then Prime Minister Jawaharlal Nehru in 1951 by planting a sapling.⁷ But this was just the beginning of reducing the thickness of Aarey Forest.

6. THE PRESENT ISSUE

The present controversy started in 2014, when the then Chief Minister Prithviraj Chavan initiated a plan to build a facility for washing and maintaining Metro coaches for the 33.5 km underground Colaba – Bandra –

⁴ Editorial, "Proposed Mumbai metro project threatens Aarey's complex ecosystem" *Down To Earth*, Nov 30, 2020

⁵ Rajendra Shinde, "Aarey Milk Colony, Mumbai as Forest Territory – A Status Report" *Xplore – The Xavier's Research Journal*, Vol 8, Issue 3, 81 – 82 (2017)

⁶ Aarey: The Wild Heart of Mumbai, available at <https://roundglasssustain.com/urbanjungles/aarey-wild-heart-mumbai> (Last Modified Aug 5, 2021)

⁷ Editorial, "The Aarey conundrum" *The Hindu*, July 12, 2022

Santacruz Electronics Export Processing Zone (SEEPZ) Metro project at Aarey Milk Colony. As a result, 30 acres of land under the land use of 'development zone' was granted for the Mumbai Metro Line – 3 project. This project is being implemented by the Mumbai Metro Rail Corporation Limited (MMRCL), which is a joint endeavour of the Government of India and the Maharashtra government.⁸

Since the project involved felling of trees, it was subjected to severe backlash from the environmentalists and citizens. The movement to save Aarey Forest began on 23rd November, 2014 when the citizens came together after seeing the notices pasted on trees at the proposed Metro car shed site. In 2015, local NGO 'Vanashakti' approached Bombay High Court, with the plea to stop felling of trees, in the midst of continuous protests.⁹ In response to this, the six member committee was appointed by the then State government in March 2015 to analyse the environmental impact of the project. The committee recommended shifting the car shed project to Kanjurmarg, with only a 16 – line stabilising unit at Aarey. But Devendra Fadnavis government rejected the committee's recommendation declaring that there could be no better place than Aarey for the construction. Later, Vanashakti reached the National Green Tribunal (NGT) claiming MMRCL had been engaged in illegal construction at Aarey, while the local residents filed the petition in High Court alleging that their land had been illegally acquired by the authorities. But all these pleas were rejected.¹⁰

On 30th August, 2019 Mumbai's Tree Authority decision arrived approving the felling of trees which led to widespread protests. Number of petitions were filed in Bombay High Court challenging the decision of the Tree Authority. NGO Vanashakti again reached the court to declare the Aarey colony as forest. Another plea was filed by an activist Zoru Bathena to give the area the status of a floodplain.¹¹ On the other hand, the Maharashtra government claimed that Aarey is not a notified forest and hence can be used for the project by the government. The court did not comment upon this claim of the government but while dismissing all these petitions, the court refused to stop the felling of trees for the car shed. The court stated, "The greens (environmentalists) fail in the instant petition because they have lost touch with the procedure to be followed as per law. The clock cannot be put back. We do not make any comments thereon as the petitioner has to now swim or sink before the Supreme Court".¹²

Normally, after losing a case in the High Court, the petitioners could file an appeal in the Supreme Court. But this judgement of the High Court came on 4th October, 2019, that was Friday, after which the weekend followed and after that, it was well known, that the apex court would be closed for the Dussehra holidays. With utter cleverness, the same day the High Court announced its decision, the BMC's bulldozers entered the site to fell the trees the very same night. After the activists got to know about this, they immediately gathered at the site to stop the axing of trees. Hundreds of people also came together protesting against the action of the BMC. The police was deployed. Section 144 of Cr.P.C was imposed to prevent the gathering

⁸ Ibid

⁹ Manasi Padake, "Aarey to Kanjurmarg in 9 yrs — Mumbai Metro car shed to still take over 2 yrs if all goes well" *The Print*, Oct, 16, 2020

¹⁰ Save Aarey Movement available at <https://aareyconservationgroup.org/save-aarey-movement/> (Last Visited Sep 25, 2022)

¹¹ "Bombay HC dismisses petitions on forest tag, tree felling in Aarey Colony" *The Tribune India*, Oct 4, 2019

¹² Vanashakti & Others Vs Union of India & Others on Oct 4, 2019

of more than five people.¹³ Protestors were arrested and detained for ‘assaulting or causing hurt’ to police personnel. All of this because they were just trying to protect the trees. This is the treatment meted out to those who try to protect the crucial part of environment in the new India.

Finally, the Supreme Court came into action, when in a special hearing on 7th October, 2019, it ordered the BMC and Maharashtra government to halt the felling of trees in the Aarey Forest and maintain status quo in the area. This order was given by the bench specially constituted after the apex court had registered suo moto case titled "In Re Felling Of Trees In Aarey Forest (Maharashtra)" based upon a letter petition by a law student Rishav Ranjan addressed to the then Chief Justice of India Ranjan Gogoi pleading stay on the felling of trees. The letter stated, “As we write this letter to you Mumbai authorities continue to kill the lungs of Mumbai i.e. Aarey forest by clearing of trees near Mithi river bank and according to news reports 1,500 trees have already been cleared by authorities. Not only this but our friends are put in jail who were peacefully organising a vigil against acts of the Municipal Corporation of Greater Mumbai (MCGM) with Mumbai Metro Rail Corporation (MMRC) at the site.”¹⁴

The court also ordered the authorities to release the people protesting against the felling of trees. To this, the government replied that they have already done their work and whatever was required for the construction had been cut. It stated that 2,141 trees have been cut in total and further there would be no felling of trees in the area. But MMRC interpreted this order as the status quo only for the felling of trees and claimed that subsequent construction activities would be carried out in the area cleared.

In November, the Shiv Sena – NCP – Congress coalition came to power by ousting BJP and Uddhav Thackeray became the CM. In one of his first decision as the chief minister, he ordered a stay on the construction of the Metro car shed at Aarey. In October, 2020, he declared 800 acres of land in Aarey Colony as ‘reserved forest’ while shifting the Metro shed project to the 102 acre salt pan land in Kanjurmarg.¹⁵

Within hours of assuming power, Maharashtra’s new government led by Eknath Shinde and his deputy Devendra Fadnavis, on 1st July, 2022, ordered the Advocate General of Maharashtra to submit an application before Bombay HC that Metro car shed will be shifted back to Aarey from Kanjurmarg.

The case is pending in the apex court. In the recent hearing, the petitioners and activists claimed that the authorities have resumed axing trees contrary to the order passed by the Supreme Court. On this, the court ordered the authorities not to carry out any work in Aarey Forest till the next hearing.¹⁶

¹³ “Mumbai Aarey protest: Police imposes Section 144, 60 protesters detained” *The Hindu Business Line*, Oct 5, 2019

¹⁴ In Re Felling Of Trees In Aarey Forest (Maharashtra)| SMW(C) No(s).2/2019

¹⁵ “Aarey: Maharashtra reserves 800 acres of land in Mumbai as forest, metro car shed to be moved” *Scroll.in*, Oct 11, 2020

¹⁶ Aarey Forest: Supreme Court Asks MMRC To Not Cut Trees As Undertaken By It Till August 30 available at <https://www.livelaw.in/top-stories/supreme-court-aarey-forest-felling-of-trees-mmrc-undertaking-207342> (Last Modified Aug 24, 2022)

7. SUGGESTIONS

After the decision of Bombay HC, online trolls were let loose to attack the activists. According to these trolls, these activists were being funded by the foreign NGOs, the leftist or liberal NGOs to hamper the country's 'vikas' and development. The main job of these trolls was to distract the attention of the public by claiming that the people who were protesting were against the metro as well as against the development. But this was absolutely false. Every person who was protesting to save the Aarey Forest was also in the favour of the metro. The only demand of these activists and protestors was to construct this Metro shed at some other location. The activists claim that there are so many other areas where the Metro shed could be alternatively constructed, but the government maintains that it has already scoured all the other sites and after analysing all the technical data, the Aarey Forest is the only place, according to them, where constructing a Metro shed would not only be most suitable but the most economically feasible also.

Kanjurmarg land is one alternative site that was being considered very seriously for a very long time, that even became the site for the Metro shed project during the brief tenure of Uddhav Thackeray as the CM of Maharashtra. Kanjurmarg is an unused salt pan land which has now turned into a dry land. This place was also suggested by the activists to be utilized for the construction. But the government had two problems with this land. First, additional costs would be incurred if the Metro shed is to be constructed on this land as it would require laying of an extra line of about 10 kilometres. Second, this is a disputed land and litigations are already going on over this land. But the activists countered both of these points.¹⁷ Firstly, they showed that within Kanjurmarg lies a huge area of 97 hectares which is not under any dispute and is litigation free. Secondly, there would be no additional cost for an extra 10 kilometres line because a line would have to pass through it anyway.¹⁸ In fact, the government itself admitted that it will get the Metro shed of Metro - 6 constructed at Kanjurmarg. So, the reasons of the government do not seem to hold ground anymore because a metro shed is going to be constructed there at all costs. The activists only claimed that if Metro shed of Metro - 6 is going to be constructed in Kanjurmarg, then Metro shed of Metro - 3 could also be built there since a large area is available for the same. In response to this, the government gave vague reasons that this cannot be done as it would lead to a lot of crowding in the area, it is not technically feasible and many more.

The activists say that this is not about 2,000 trees, but saving the entire Aarey Forest. Because the government is using the Metro shed as a mere excuse to breach into the Aarey Forest and start some development. According to them, the government plans to build a 33 storeyed Metro Bhavan with restraints, gyms and a zoo.¹⁹ There are plans to construct commercial buildings near this Metro shed. From this it can be concluded that the government wants to commercialise the entire area of Aarey Forest and then sell it to the real estate lobby. This real estate reason sounds quiet believable because the same has already happened in the country. Take the example of Bengaluru, one of the most developed cities in the country. Only in Bengaluru South Region, the vegetation cover have shrunk from 55.17% in 1973 to just 2.66% in 2017 due to commercial and residential purposes.²⁰ According to the Indian State of Forest Report 2021, Bengaluru

¹⁷ "Shifting car shed from Aarey to Kanjurmarg not viable, to cost about Rs 5,000 crore: Municipal Commissioner" *The Indian Express*, Sep 5, 2019

¹⁸ Makarand Gadgil, "Green activists punch holes in MMRCL's Kanjurmarg story" *Mumbai Mirror*, Sep 4, 2019

¹⁹ Sumedha Pal, "BMC Approves Felling of Nearly 3000 Trees in Mumbai's Aarey Forest" *News Click*, Aug 31, 2019

²⁰ Editorial, "Shrinking green cover: A desperate tree-hug" *Deccan Herald*, Feb 9, 2022

has lost around 5% of forest between 2011-2021.²¹ This shows how gradually the city has turned into a concrete jungle.

If the government chooses the Kanjurmarg land, then most of the issues would be solved, but the result is that the government is not ready to shift its position even to have the slightest chance of preventing the felling of trees.

The biggest concession provided by the government and authorities for axing the trees that they would transplant them. But this theory of tree transplantation to counter deforestation has not proven to be effective. In 2017, when the protests gathered pace against the felling of 2,141 trees in Aarey Forest, the Bombay HC appointed a committee to inspect the transplanted trees. The committee, in its report in 2019, concluded that over 60% of trees transplanted had died. Total 1,462 fully grown trees were inspected that were transplanted since 2017; of these 759 were either dead or dying. For this, the report pointed the inadequate care of trees and lack of scientific transplanting methods by the authorities even after MMRCL having the budget of Rs 5.36 crore for the transplantation, at the rate of Rs 50,000 per tree.²²

Zoru Bhathena, petitioner in the case, who also accompanied the committee to the site visits, claimed that the MMRCL “lies through its teeth”. She said that the MMRCL claimed in the court that they have hired an arborist (a person trained in the science of planting and maintaining trees) for Rs 21 lakhs a month but in reality there was no such arborist appointed.²³ According to Sanjiv Valsan, an Aarey activist, transplantation projects are a way of making money in the hands of contractors as “they get paid for every tree that comes in, also there is money to be made out of selling woods”.²⁴ He said that he noticed contractors uprooting the trees that were transplanted for accommodating the new ones.

This problem is not only concentrated to one area, but in the whole country due to lack of uniform guidelines and the authority to check their implementation. Also, there is no penalty for the failure in transplanting a tree, so there is no deterrent effect. Valsan pointed out, “The problem is not that transplantation is bad but the authorities who talk about transplantation are rarely serious about the survival of the trees. And there is no penalty for a dead tree.”²⁵

Countries like Hong Kong and UK have outlined their guidelines with the aid of their research bodies that provide a systematic approach to ensure effective transplantation. It starts with separating the trees that do well in transplantation from those that do not. Then, trees have to be dug up isolating their root balls and cutting the branches with only a small shoot being left for revival. These trees are made to adjust to new environment by using their original soil during transplantation. These guidelines mandate regular monitoring of these trees for first 12 months to ensure hydration. But in India, there is no such procedure and the job is largely left to the contractors without any authority to supervise or monitor them.²⁶

²¹ Editorial, “Running for forest cover” *Bangalore Mirror*, Jan 16, 2022

²² Editorial, “Why Tree Transplantation Can't Make Up For Loss Of Green Cover” *India Spend*, Sep 17, 2021

²³ Interview with Zoru Bhathena, Environmental Activist, *Business Standard*, Sep 19, 2021

²⁴ Interview with Sanjiv Valsan, an Aarey activist, *Business Standard*, Sep 19, 2021

²⁵ Ibid

²⁶ Editorial, “Tree transplantation in cities have no method; doesn't help green cover” *Business Standard*, Sep 19, 2021

While hearing a PIL against the indiscriminate felling of trees by Bangalore Metro Rail Corporation Ltd (BMRCL) in 2019, the Karnataka HC constituted a Tree Expert Committee in order to lay down guidelines regarding tree transplantation. The decisions regarding tree felling and transplantation can only be taken on the recommendation of the committee. The committee is also empowered to take such decisions for future infrastructure projects. However, in the same case, the court clarified that “transplantation should be considered only if the tree cannot be retained at its location.”²⁷

Hence, guidelines like these should be made for whole of the country and be implemented uniformly under a specific and distinct authority free from the influence of government. Not only this, such guidelines should carry heavy sanctions with them making the government and authorities realise their responsibility towards the environment

Also, it should be kept in mind that transplantation should be carried out when there is no option left.

8. CONCLUSION

On 15th August, 2022, India completed its 75 years of independence but it is still grappling with the problem to protect its existing natural forest cover instead of compensating it with mere plantations. According to Indian State of Forest Report (IFSR) 2021 released by the government, India’s total forest cover is 713,789 sq. km (21.71%) of India’s geographic area. Citing the report, the government claimed a marginal increase of 0.22% in the country’s forest cover.²⁸ But a close analysis of the report reflects that, between 2019 and 2021, the quality of India’s forests deteriorated across 15,183 sq. km as forests were either axed or thinned out. The area of deteriorating forests is 10 times greater than the area of new forests. Shockingly, the deterioration of 9,117 sq. km was so severe that they turned into scrubs and non – forest lands.²⁹ Moreover, the IFSR 2021 report reveals that the country’s tree cover is 95,748 sq. km, just 2.91% of its geographical area.

The cities are left with depleted trees due to the urban projects planned with no or little thought for their adverse environmental impact. For instance, 94% of Mumbai has turned into a concrete jungle over 40 years. According to the BMC Tree Census in 2018, the city has only one tree for every four persons.³⁰ Nagpur has lost 40 sq. km of its forest cover to infrastructure projects between 1993 and 2018, reveals a study. Bengaluru has 0.166 trees per person, according to 2013 figures.³¹ While the ideal tree – human ratio stands at 8:1.

²⁷ Editorial, “What does it take to transplant a tree?” *Citizen Matters*, July 2, 2021

²⁸ Government of India, *Indian State of Forest Report, 2021* (Ministry of Environment Forest and Climate Change)

²⁹ [Analysis] Indian forests around the size of Nagaland, thinned down in two years *available at* <https://india.mongabay.com/2022/01/analysis-indian-forests-around-the-size-of-nagaland-thinned-down-in-two-years/> (Last Modified Jan 27, 2022)

³⁰ Sonali Telang, “One tree for every four persons: BMC census” *The Asian Age*, Dec 21, 2017

³¹ Editorial, “Saving trees by transplanting: BMRCL’s approach has some lessons for Bengaluru” *Citizen Matters*, Nov 26, 2018

The government takes the defence of a study conducted by NASA stating how China and India are contributing to the growth of greenery. The headline might sound good but upon analysing the study in depth produces the result that 82% of the greenery is due to 'intensive cultivation of food crops'.³² It has also been claimed that India's forest cover has increased but this is not entirely true. Earlier, the definition of forest used to be different. The United Nations' Food and Agriculture Organisation (FAO), defines forest as "land spanning more than 0.5 hectares with trees higher than 5 metres and a canopy cover of more than 10%, or trees able to reach these thresholds in situ. It does not include land that is predominantly under agriculture or urban use."³³ On the other hand, in India the government considers an area of 1 hectare or more with at least 10% canopy, irrespective of land use and ownership, including all tree crops, fruit orchards, bamboo, and agro – forestry, as a forest.³⁴ This definition of forest has been criticised by many scientists as it does not provide the actual picture of natural forests in the country.

Aarey Forest is just a small example. As a fact, from 2014 to 2019, the present government has given forest clearance to 99.82% of the industrial projects. The same figure was around 80% during the previous government.³⁵ This issue is not about comparing the political parties that which one is better or who has given more forest clearance. This is about the vicious cycle of first gaining the trust of people by giving long speeches about the importance of environment and then after coming into power destroying that very environment or paying no heed to its destruction in the name of development. This practice is followed by all political parties, this cycle has been running since long and will continue to run if people would remain just mute spectators. That is why such protests are necessary so that the voices of some people would reach to the ears of the rest of the common public, judiciary and the authorities.

The state is not called as the trustee of natural resources just for namesake under the doctrine of public trust. It is its duty to do everything that it can to ensure sustainable development in the long run. Where the world is already choking with growing consumption, depletion of natural resources, destruction of forest, extinction of species has become the talks of the past. But their importance cannot be ignored as they still hold undeniable relevancy.

During the recent pandemic, the whole world was fighting for the oxygen and now those natural sources of oxygen are being cut. The question arises what people have learned.

³² China and India Lead the Way in Greening available at <https://earthobservatory.nasa.gov/images/144540/china-and-india-lead-the-way-in-greening#:~:text=%E2%80%9CChina%20and%20India%20account%20for,in%20populous%20countries%20from%20overexploitation.%E2%80%9D> (Last Modified Feb 11, 2019)

³³ Comparative framework and Options for harmonization of definitions available at <https://www.fao.org/3/y4171e/y4171e10.htm> (Last Visited Sep 25, 2022)

³⁴ Jayashree Nandi, "Recheck forest cover data, UN body tells India; flags concern about definition" *Hindustan Times*, Jan 10, 2019

³⁵ Jacob Koshy, "99.82% projects in forests got nod" *The Hindu*, Feb 13, 2019