

Aravalli Hills as India's Green Shield: Balancing Economic Development and Environmental Sustainability under Indian Laws

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ABSTRACT:

The Aravalli hill range which is one of the oldest fold-mountain systems in India also serves as a major ecological barrier against the advancing Thar Desert from Gujarat into Rajasthan, Haryana and Delhi, making it a vital groundwater recharge zone and an important biodiversity corridor that upholds tiger reserves and wildlife sanctuaries. But decades of unregulated mining, deforestation and unplanned urbanisation around Gurugram, Faridabad and Alwar have been gradually eating away at this natural buffer, creating an ongoing conflict between economic progress and ecological integrity. This paper examines the constitutional, statutory and judicial framework governing the Aravallis, tracing the interplay between the Environment (Protection) Act 1986, the Forest (Conservation) Act 1980, the Wildlife (Protection) Act 1972, the colonial-era Punjab Land Preservation Act 1900, and landmark Supreme Court interventions in *M.C. Mehta* and *T.N. Godavarman Thirumulpad*. In particular, it delves into the recent ongoing (& also unsolved) controversy over "uniform definition" of Aravalli Hills and Ranges that were adopted by & then stayed by The Supreme Court after late 2025. This paper, therefore, contends that piecemeal, revenue-classification-based protection has allowed dilution time and again and calls for a dedicated and ecologically founded statutory regime to protect the Aravallis in perpetuity.

Keywords: Aravalli Hills; Environmental Sustainability; Forest Conservation Law; Sustainable Development; Mining Regulation.

1. INTRODUCTION:

The Aravalli hill range is one of earth's oldest fold-mountain ranges, it runs about 670–700 kilometers from near Delhi, through southern Haryana and Rajasthan to Ahmedabad in Gujarat, its highest peak, Guru Shikhar on Mount Abu reaching a height of 1,722 metres. Far older than the Himalayas, this ancient range performs roles that no man-made solution can perform: it halts the eastward advancement of the Thar Desert; it steers monsoon clouds to the rivers of sub-Himalaya, it recharges aquifers supplying Delhi,

Gurugram, Faridabad and Jaipur and Alwar and shelters diverse wildlife, including mammals such as the leopard, striped hyena and golden jackal, along with over three hundred bird species using the Central Asian Flyway. It is not an exaggeration to describe the Aravallis as India's green shield, a description that captures the range's irreplaceable ecological function for north-western India. The ecological significance finds constitutional resonance. The right to pollution-free water and air is a fundamental right included in the said Article 21, which guarantees that no person shall be deprived of his life or personal liberty except according to procedure established by law, Supreme Court.¹ Article 48A further directs that the State shall "endeavor to protect and improve the environment and to safeguard the forests and wildlife of the country"²; Article 51A(g), in turn, casts a fundamental duty on every citizen "to protect and improve the natural environment including forests, lakes, rivers" etc.³ The provisions were the normative underpinnings to decades of environmental litigation relating to the Aravallis, most notably the continuing mandamus proceedings in *M.C. Mehta v. Union of India* and *T.N. Godavarman Thirumulpad v. Union of India*.

Yet the same hills that perform this ecological role sit astride one of India's most economically dynamic corridors, the Delhi-Gurugram-Faridabad-Alwar belt, where silica-sand, masonry-stone and marble mining, together with an insatiable real-estate market, have exerted continuous pressure on forest and revenue land alike. The result has been a decades-long contest between the imperatives of economic development and the constitutional and statutory mandate to conserve a fragile, non-renewable landscape. This paper examines that contest across four dimensions, the ecological significance of the range. The constitutional and statutory framework governing it, the judicial interventions culminating in the unresolved 2024–26 controversy over the "uniform definition" of the Aravalli Hills and Ranges and the structural gaps that continue to permit erosion of legal protection notwithstanding nearly three decades of Supreme Court oversight.

II. Aravalli Hills as India's Green Shield: Ecological Significance

The Aravallis are not a continuous mountain, but rather a system of large hills, hillocks and ridges rising to distinctly different elevations that have been identified in the four States/Union Territory by ad hoc revenue entries as 'Gair Mumkin Pahar' (non-cultivable hill), 'Banjar' (wasteland) or notified forest, rather than on any unified scientific basis. A Committee set up by the Ministry of Environment, Forest and Climate Change including representatives from the Forest study of India. Geological Study of India and Central Empowered Committee constituted by Supreme Court found out that around fifty-eight per cent of Aravalli landscape is agricultural land while twenty per cent protected forest with four tiger reserves as well as about twenty wildlife sanctuaries covering almost eleven percent wooded area six to seven

¹ *Subhash Kumar v. State of Bihar*, AIR 1991 SC 420: (1991) 1 SCC 598.

² INDIA CONST. art. 48A; *T.N. Godavarman Thirumulpad v. Union of India*, W.P. (Civil) No. 202 of 1995, Order dated 26 September 2005.

³ INDIA CONST. art. 51A(g).

residential zones approximately two water bodies.⁴ According to a detailed analysis published by the Union Environment Minister, as little as 0.19 per cent of this landscape (around over two hundred and seventy-seven square kilometres out of nearly 1.43 lakh square kilometres) has been legally mined at present.⁵

Table 1: Geographic and Ecological Profile of the Aravalli Range

Parameter	Detail
Approximate length	670–700 km, from the Delhi Ridge to near Ahmedabad, Gujarat
States/UT traversed	NCT of Delhi, Haryana, Rajasthan, Gujarat
Highest peak	Guru Shikhar, Mount Abu (1,722 m)
Land-use composition	~58% agricultural; ~20% protected forest; ~11% wooded; ~6–7% residential; ~2% water bodies
Protected areas	4 tiger reserves (incl. Sariska); ~20 wildlife sanctuaries
Legal mining footprint	~277 sq. km (0.19%) of ~1.43 lakh sq. km landscape

The range hosts Sariska Tiger Reserve and lies at the geological interface of Ranthambore Tiger Reserve, both critical habitats for India's national animal, together with wetlands such as Sambhar Lake, formed within an Aravalli depression.⁶ To further acknowledge this ecological function, the Ministry of Environment, Forest and Climate Change launched the Aravalli Green Wall Project on 25 March 2023 aiming for an approx 1,400 km long and five km wide afforestation and water-conservation belt along Haryana, Rajasthan, Gujarat and Delhi.⁷ Prime Minister reiterated this initiative again on World Environment Day, 5 June 2025, apparently offering a buffer zone proposal ranging from approximately 6.45 million hectares in area that translates with commitment by India to share its current targets, up from twenty-one million hectares to twenty-six million hectares of improved land-restoration and raising target by Two-thousand thirty based on commitments made at the fourteenth Conference of Parties during UN Convention to Combat Desertification waiver hosted by India built happenstance before coming with the proposal.⁸

III. The Constitutional and Statutory Framework

A. Constitutional Foundations.

Further, apart from articles 21, 48A and 51A (g) above, the Supreme Court has also read in these provisions a Public Trust Doctrine to rule in *M.C. Mehta v. Kamal Nath* that some resources such as forests, rivers

⁴ *Down To Earth*, "No New Mining Leases, Aravalli Protection Intact: MoEFCC Clarifies After SC-Backed Definition", 22 December 2025.

⁵ *Down To Earth*, "No New Mining Leases, Aravalli Protection Intact: MoEFCC Clarifies After SC-Backed Definition", 22 December 2025 (statement of Union Minister Bhupender Yadav).

⁶ *The Wire*, "The Aravalli Hills Have a New Definition. Here's Why This Is a Problem.", 7 December 2025.

⁷ Ministry of Environment, Forest and Climate Change, Press Information Bureau, "Shri Bhupender Yadav Launches Aravalli Green Wall Project", 25 March 2023

⁸ *Outlook Traveller*, "Explained: The Aravalli Green Wall Project", 9 June 2025.

and air are held by the State in trust for the public and cannot be used for private or commercial purposes which have an adverse impact on public interest.⁹ This principle has been invoked time and again to prevent deformation of Aravalli woodland and revenue property for private creation.

B. Central Legislation.

The Environment (Protection) Act 1986 provides the primary statutory basis to support Aravalli conservation. Section 3 gives the Central Government all powers to take steps for protection and improvement¹⁰, Section 5 provides for power of Directions, including closure or regulation of any industry operation or process¹¹, Section 15 prescribes penalties for contravention.¹² These powers are exercised as the Ministry issued Notification S.O. 319(E) dated 7 May 1992, which declared certain Aravalli areas of Gurgaon (Haryana) and Alwar (Rajasthan) ecologically sensitive enough to require prior consent before any new leases of mines, or renewal of old mining leases be imposed in case these cannot exist without causing ecological damage.¹³ An amendment notification following the notification of 27th January, 1994 was issued on the 4th May, 1994-banning mining activities in the zone without prior Environmental Impact Assessment.¹⁴

Forest land within the Aravallis is separately governed by the Forest (Conservation) Act 1980, Section 2 of which requires prior Central Government approval before forest land is used for any non-forest purpose.¹⁵ This Act was renamed the Van (Sanrakshan Evam Samvardhan) Adhiniyam through the Forest (Conservation) Amendment Act 2023 (Act 15 of 2023).¹⁶ Wildlife habitats falling in range are protected under the Wildlife (Protection) Act 1972 that grants power to State Governments to notify sanctuaries¹⁷ under Section 18 and national parks can be notified under Section 35.¹⁸ Mining activity itself is regulated by the Mines and Minerals (Development and Regulation) Act 1957, together with Rule 37 of the Mineral Conservation and Development Rules 1988.¹⁹ Disputes arising from these overlapping regimes are increasingly adjudicated before the National Green Tribunal, founded in Section 14 of the National Green Tribunal Act 2010,²⁰ with Section 15 empowering it to order compensation and restitution of damaged environment.²¹

C. State-Specific Legislation.

⁹ *M.C. Mehta v. Kamal Nath*, (1997) 1 SCC 388.

¹⁰ The Environment (Protection) Act, 1986 (Act No. 29 of 1986), s. 3.

¹¹ *Id.*, s. 5.

¹² *Id.*, s. 15.

¹³ Notification No. S.O. 319(E), dated May 7, 1992, issued under the Environment (Protection) Act, 1986 (Act 29 of 1986), s. 3(2); *M.C. Mehta v. Union of India*, order dated May 8, 2009 (SC)

¹⁴ *Idib 13* (recording Notification dated Jan. 27, 1994, as amended on May 4, 1994, issued under s. 3(2) of the Environment (Protection) Act, 1986 (Act 29 of 1986) read with r. 6 of the Environment (Protection) Rules, 1986).

¹⁵ The Forest (Conservation) Act, 1980 (Act 69 of 1980), s. 2; *T.N. Godavarman Thirumulpad v. Union of India*, (1997) 2 SCC 267.

¹⁶ The Forest (Conservation) Amendment Act, 2023 (Act No. 15 of 2023).

¹⁷ The Wild Life (Protection) Act, 1972 (Act 53 of 1972), s. 18.

¹⁸ *Id.*, s. 35.

¹⁹ The Mines and Minerals (Development and Regulation) Act, 1957 (Act 67 of 1957); the Mineral Conservation and Development Rules, 1988, r. 37; *M.C. Mehta v. Union of India*, AIR 2004 SC 4016 : (2004) 12 SCC 118.

²⁰ The National Green Tribunal Act, 2010 (Act 19 of 2010), s. 14.

²¹ *Id.*, s. 15.

The primary tool in Haryana is still the colonial-era Punjab Land Preservation Act 1900, under sections 4 and 5 of which the Forest Department can notify areas where breaking of land, quarrying or clearing of vegetation is forbidden or restricted.²² These notifications first issued for the Badkal and Pali areas in 1992 have been extended many times, largely at the behest of Supreme Court orders.²³ Mining regulation in Rajasthan, which has been enforced since 9 January 2006, used an administrative definition that any landform above one hundred metres from local relief, and its supporting slopes was part of the Aravalli hills.²⁴

Table 2: Key Legal and Regulatory Instruments Applicable to the Aravalli Hills

Instrument	Year	Relevance to the Aravalli Hills
Punjab Land Preservation Act, ss 4–5	1900	Prohibits/restricts land-breaking, quarrying in notified Aravalli forest villages (Haryana)
Wildlife (Protection) Act, ss 18, 35	1972	Enables declaration of sanctuaries/national parks, e.g., Sariska
Forest (Conservation) Act / Van Adhiniyam, s 2	1980/2023	Requires Central approval for non-forest use of forest land
Environment (Protection) Act, ss 3, 5, 15	1986	General powers, directions, penalties; basis of the 1992 Aravalli notification
MoEF Notification S.O. 319(E)	1992	Declares parts of Gurgaon and Alwar Aravallis ecologically sensitive
Mines and Minerals (Development and Regulation) Act	1957	Governs grant, renewal and regulation of mining leases
National Green Tribunal Act, ss 14–15	2010	Adjudication, compensation and restitution for environmental damage

IV. Judicial Interventions: The Aravallis before the Supreme Court

Broadly speaking, an engagement with the Aravallis in judicial forum has advances dominantly through two continuous mandamus proceedings. In *T.N. Godavarman Thirumulpad v. Union of India*, the Supreme Court, by order dated 12 December 1996, held that the word "forest" in Section 2 of the Forest (Conservation) Act 1980 must be understood in its dictionary sense, irrespective of ownership or classification, thereby bringing unclassified Aravalli hillocks recorded merely as "Gair Mumkin Pahar" within the Act's protective umbrella.²⁵ A later order (26 September 2005) in the same petition stated that

²² The Punjab Land Preservation Act, 1900 (Punjab Act 2 of 1900), ss. 4–5.

²³ Aravalli Bachao, "PLPA Dilution" (Feb. 26, 2024), available at <https://aravallibachao.org/laws-protecting-aravallis/plpa-dilution/> (last visited May 8, 2026); *M.C. Mehta v. Union of India*, supra note 19

²⁴ King Stubb & Kasiva (KS&K), "Defining The Aravali: A Doctrinal And Scientific Defence Of The Supreme Court's Approach To Environmental Adjudication," Dec. 30, 2025, available at <https://ksandk.com/regulatory/aravali-hills-judgement-explained/> (last visited Apr 8, 2026).

²⁵ *T.N. Godavarman Thirumulpad v. Union of India*, supra note 15 (order dated Dec. 12, 1996).

Net Present Value should be recovered from any party utilizing forest land for non-forest purposes.²⁶ Concurrently, in *Vellore Citizens Welfare Forum v. Union of India* the Court accepted the Precautionary Principle and the Polluter Pays Principle as part of Indian environmental jurisprudence vis-a-vis Article 21, considered a constitutional right.²⁷ These doctrines were then applied directly to Aravalli mining in *M.C. Mehta v. Union of India* by a judgment dated 18 March 2004, where the Court ruled that any permissible mining in the Aravalli hills of Gurgaon and Faridabad must be sustainable-development oriented with severe conditions, and declared that unrestrained continuing irreversible degradation could threaten prohibition.²⁸ The Court issued that warning in an order dated 8th May, 2009, in which it suspended all mining operations over an area of about four hundred and forty-eight square kilometres of the Aravalli hill range covering Faridabad, Gurgaon and Mewat districts.²⁹

Table 3: Timeline of Major Judicial Interventions on the Aravalli Hills

Case / Order	Date	Key Holding
<i>T.N. Godavarman Thirumulpad v. UOI</i>	12 Dec 1996	Dictionary meaning of "forest" applies irrespective of ownership
<i>M.C. Mehta v. Kamal Nath</i>	13 Dec 1996	Public Trust Doctrine applied to forest/riverine land
<i>Vellore Citizens Welfare Forum v. UOI</i>	28 Aug 1996	Precautionary and Polluter Pays Principles recognised
<i>Godavarman</i> (NPV order)	26 Sep 2005	NPV recoverable for diversion of forest land
<i>M.C. Mehta v. UOI</i>	18 Mar 2004	Aravalli mining permissible only on sustainable-development conditions
<i>M.C. Mehta v. UOI</i>	8 May 2009	Mining suspended across ~448 sq. km, Faridabad–Gurgaon Aravallis
<i>In Re: Definition of Aravalli Hills and Ranges</i>	9 May 2024	Fresh mining leases barred in 4 States/UT; uniform-definition committee ordered
<i>In Re: Definition of Aravalli Hills and Ranges</i>	20 Nov 2025	100 m elevation/500 m proximity definition accepted
<i>In Re: Definition of Aravalli Hills and Ranges</i>	29 Dec 2025	Definition stayed; High-Powered Expert Committee ordered

The most consequential and pending development is the case *In Re: Issues Relating to Definition of Aravalli Hills and Ranges*. On 9 May 2024, the Court imposed an injunction on Delhi, Haryana, Rajasthan and

²⁶ *T.N. Godavarman Thirumulpad v. Union of India*, W.P. (Civil) No. 202 of 1995, Order dated 26 September 2005.

²⁷ *Vellore Citizens Welfare Forum v. Union of India*, (1996) 5 SCC 647 : AIR 1996 SC 2715.

²⁸ *M.C. Mehta v. Union of India*, *supra* note 19.

²⁹ *Supra* note 13; Casemine, "M.C. Mehta v. Union of India and Others" (Case Summary), available at: <https://www.casemine.com> (last visited on July 8, 2026).

Gujarat from awarding fresh mining leases and directed a committee to prepare a scientific and uniform definition of the range.³⁰ Acting on that committee's report, the Court, by judgment dated 20 November 2025, accepted a definition treating any landform rising at least one hundred metres above its local relief as an "Aravalli Hill."³¹ The ruling was also roundly and immediately condemned for leaving the vast majority of documented Aravalli hillocks out of statutory protection.³² In response to this critique, a three-judge constituted Bench that included the Chief Justice of India on 29 December 2025 stayed its own recommendations by ordering an independent expert evaluation before implementation.³³ The interim protection has been granted on 21 January 2026, with the listing of that matter for further hearing.³⁴

V. Economic Development versus Environmental Sustainability: The Core Conflict

The clash between the pressures of development and conservation in the Aravallis is neither novel nor just theoretical. Forest study of India assessment, Haryana's forest cover is reported to be only 3.59 per cent of its geographical area, the lowest in all Indian States. A study conducted by the Wildlife Institute of India reportedly found that thirty-one of one hundred and twenty-eight study hills in the Rajasthan part of unattacked Aravallis have been completely razed for mines. In Haryana, notifications limiting land-use changes under Sections 4 and 5 of the Punjab Land Preservation Act 1900 cover an estimated seventy-four thousand acres of Aravalli and Shivalik forest, approximately one-third of the effective forest cover in the State.³⁵ The prevalence of this vulnerability was pointedly demonstrated in 2019 when on 27 February, the Haryana Legislative Assembly passed an amendment to the Punjab Land Preservation Act aimed at removing urban master-plan areas of Gurugram and of Faridabad from protection under this Act. On 1 March 2019, the Supreme Court stayed the amendment and observed that the action of the State was "misadventurous" as it has acted in violation the interim orders passed by this court.³⁶ This episode is telling because it reveals a familiar pattern whereby legal protection for the Aravallis has relied far less on enduring legislative safeguards than on the slow, but unwavering action of courts stepping in to thwart successive attempts by government executives seeking to dilute statutorily protected ecosystems.

A similar pattern returned in the new definitional debate. A study by the Ashoka Trust for Research in Ecology and the Environment said that if the Court's hundred-metre definition (November 2025) were to

³⁰ *Ibid*

³¹ India Legal, "Protection of Aravali Hills Ecosystem: Supreme Court Bans 4 States from Granting Fresh Mining Lease", May 10, 2024, (last visited on Apr 10, 2026).

³² *Supreme Court Cases*, "In Re: Issue Relating to Definition of Aravali Hills and Ranges", 20 November 2025, available at: [URL](#) (last visited on Apr 18, 2026).

³³ SCC Online Blog, "Supreme Court Stays Aravalli Order; Directs Constitution of High-Powered Committee to Clarify Definition of Aravalli Hills and Ranges", Dec. 29, 2025, available at: https://www.sconline.com/blog/post/2025/12/29/sc-stays-aravalli-order-directs-constitution-of-expert-committee/?utm_source=chatgpt.com (last visited on Apr 8, 2026); Mongabay India, "Supreme Court Stays Order on Aravalli Definition", Dec. 30, 2025, available at: [URL](#) (last visited on Jun 8, 2026).

³⁴ *The Leaflet*, "Supreme Court's Suo Motu Intervention in the Aravallis Case Explained", 5 February 2026, available at: [URL](#) (last visited on Jun 9, 2026).

³⁵ Aravalli Bachao, *supra* note 23

³⁶ *Land Conflict Watch*, "Haryana Government to Amend PLPA Act, Despite a Supreme Court Stay Order", 4 October 2024, available at: [URL](#) (last visited on July 8, 2026); iasParliament, "Amendments to Punjab Land Preservation Act", 7 March 2019, available at: [URL](#) (last visited on July 8, 2026).

be applied, it would remove over seventy per cent of Rajasthan's currently recognised Aravalli area spreading across more than eighteen thousand villages, raising comparably damaging impacts in Haryana and Gujarat.³⁷ The Forest Survey of India's own data indicated that of 12,081 documented Aravalli hills of twenty metres or more in height, only 1,048, or roughly 8.7 per cent, exceed the hundred-metre threshold.³⁸ Commentators have noted that this instability originates from the same vulnerability pinpointed in Godavarman: dependence on revenue categories created with no intention of monitoring ecological continuity.

VI. Critical Analysis and the Way Forward

This study highlights three structural weaknesses. To begin with, the Aravalli protection remains jurisdictionally diverse through a colonial land-preservation statute, general central legislation and ad hoc executive notifications none of which is specifically designed for the Aravallis. Second, protection is largely judicially built rather than legislatively secured. Third, the continuous lack of a scientific consensus on "Aravalli hill" has enabled governments succeeding each other to claim that big portions of ecologically important land do not even come under such safeguards. But the recent orders from the Court itself suggest a partial solution. Post the order on 9 May, 2024, The Court ordered that a Management Plan for Sustainable Mining be prepared for the entire Aravalli landscape which would delineate ecologically sensitive and restoration-priority zones and required suitable post-mining restoration.³⁹ The Bench also warned that an outright ban on mining may not be effective because it could merely push the activity into the underground.⁴⁰ Combined with the Court's mention of intergenerational equity, these observations point toward a judicial lean in favor of more balanced regulation, based on science and thus less likely to draw either unqualified extraction or outright ban.⁴¹

There are three things that warrant legislative intervention going forward. A unified law for the Aravalli will also protect it against unanticipated zoning changes at the State level, successfully implemented in Haryana in 2019. Second, we argue that more ecological (rather than purely topographic) criteria ones accounting for hill-to-hill connectivity and groundwater-recharge function deserve equal weight to the contour-based definition under judicial review. Third, there must be stronger legal backing and ring-

³⁷Down To Earth, "Institutional Expertise Meets Judicial Confusion in the Aravalli Hills Definition Case," Dec. 30, 2025 (citing an Ashoka Trust for Research in Ecology and the Environment spatial analysis), available at: <https://www.downtoearth.org.in/forests/institutional-expertise-meets-judicial-confusion-in-the-aravalli-hills-definition-case> (last visited Apr. 10, 2026).

³⁸ **Down To Earth**, "Institutional Expertise Meets Judicial Confusion in the Aravalli Hills Definition Case," Dec. 30, 2025 (citing Forest Survey of India data placed before the Supreme Court), available at: <https://www.downtoearth.org.in/forests/institutional-expertise-meets-judicial-confusion-in-the-aravalli-hills-definition-case> (last visited Apr. 10, 2026).

³⁹ **Supreme Court Observer**, "Court Orders Management Plan for Sustainable Mining in Aravali," Nov. 20, 2025, available at: <https://www.scobserver.in/supreme-court-observer-law-reports-scolr/court-orders-management-plan-for-sustainable-mining-in-aravali-in-re-issues-relating-to-definition-of-aravali-hills-and-ranges/> (last visited Apr. 10, 2026); **Ministry of Environment, Forest and Climate Change**, "Aravalli Hills: Protecting Ecology and Ensuring Sustainable Development," Factsheet (ID No. 150596), Press Information Bureau, available at: <https://www.pib.gov.in/FactsheetDetails.aspx?Id=150596> (last visited Apr. 10, 2026).

⁴⁰ India Legal, *supra* note 31

⁴¹ *In Re: Issue Relating to Definition of Aravali Hills and Ranges*, *supra* note 32; *Vellore Citizens Welfare Forum v. Union of India*, *supra* note 27.

fenced funding for the Aravalli Green Wall Project as afforested land cannot replace further ecosystem degradation which is not reversible once flattened.⁴² Definitional ambiguity still prevails, aggravated by an inadequate officially recognised range: a 2009 governmental reply to Parliament identified parcels of Aravalli across thirty-seven districts, this number was subsequently limited to thirty-four districts in submissions before the Court.⁴³ Audits have yielded similar results independently, with the Comptroller and Auditor General's 2022 report reportedly finding more than three quarters of Haryana's Aravalli forests already substantially degraded.⁴⁴ Pending final resolution, mining and land-use decisions continue to be governed by the more protective slope-based criterion in the Forest study of India's 2010 status report.⁴⁵

7. Conclusion

The Aravalli hills, for thousands of years now, have served as a green barrier to desertification and water shortage while serving as wildlife habitat in one of India's most populous and economically vibrant regions. Indian law has evolved in response to this need, by constitutionally principled accretions from both the Centre and States as well as through Supreme Court intervention since *Godavarman* and *Kamal Nath* in 1996 continuing with the still-unresolved definitional proceedings of 2024–26. That the Court has, in six short weeks, both embraced and temporarily stayed a definition of the sublime subject matter it has sought to protect for over thirty years is perhaps the clearest proof yet that ad hoc, litigation-driven protection is nearing its end. If economic development and environmental sustainability long enshrined as constitutional doctrine are to be safeguarded in practical terms, a landscape as ecologically unique and legally hotly contested as the Aravallis requires a statutory framework designed for its specific environment, not revenue lexicon.

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⁴² Outlook Traveller, *supra* note 8.

⁴³ **Press Information Bureau**, "English Releases," July 29, 2009 (referring to thirty-seven districts), available at: <https://www.pib.gov.in/PressReleasePage.aspx?PRID=406115> (last visited Apr. 8, 2026); **LevelUp IAS**, "Aravalli Rule Update & Environmental Concern," Jan. 1, 2026, available at: LevelUp IAS article (last visited Apr. 8, 2026); **The Wire**, *supra* note 6 (referring to thirty-four districts).

⁴⁴ **NCR Guide**, "Aravalli Green Wall Project: Haryana's Bold Step to Combat Desertification and Revive Forests," June 5, 2025 (citing the Comptroller and Auditor General of India Report, 2022), available at: <https://ncrguide.com/aravalli-green-wall-project-haryana/> (last visited Apr. 8, 2026).

⁴⁵ Down To Earth, *supra* note 37.