
INTERNATIONAL JOURNAL OF ADVANCED LEGAL RESEARCH

**CONSTITUTIONAL VISION AND JUDICIAL INTERPRETATION: A
STUDY ON INDIA'S COMMITMENT TO SDG-15**

- Angarika Borah*

Abstract

Sustainable development concept which began to emerge as early as the 1970s, notably after the 1972 UN Conference in Stockholm¹, is a framework composed of different principles for global development that seeks to harmonize human well-being and environmental sustainability. The adoption of sustainable development goals in worldwide was a necessary step, as in the pursuit of development, the mostly exploited entity is the mother nature. In India, sustainable development goal 15 has found a firm foothold in jurisprudence through the interpretation of Article 21², Article 48-A³ and 51-A (g)⁴ of the Constitution, by the courts to protect and promote healthy environment. Environmental litigation particularly through Public Interest Litigation (PIL) in India has become a powerful mechanism for securing environmental justice and supporting the nation's commitment towards sustainable development goal 15. The progressive interpretation of Indian judiciary enhances not only the transformative potential of the Constitution but also open new areas of environmental jurisprudence.

This paper primarily focuses on the contribution of environmental litigation in India to achieve SDG 15 and its role in enabling judiciary to perceive the constitutional vision of environmental protection. The objective of this paper includes examining the landmark cases in India, such as T.N. Godavarman Thirumulapad v. Union of India (2024)⁵, State of Bihar

*Assistant Professor, IFIM Law School

¹United Nations, *United Nations Conference on the Human Environment, Stockholm 1972*, UNITED NATIONS, <https://www.un.org/en/conferences/environment/stockholm1972> (last visited Oct. 26, 2025).

²Constitution of India of 1950. art. 21

³*Id.* art. 48-A

⁴*Id.* art. 51-A (g)

⁵In Re: T. N. Godavarman Thirumulapad v. Union of India & Ors., INSC 178 (Delhi High Court 2024).

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

and others. v. Pawan Kumar and others. (2021)⁶, among others, which signifies ongoing efforts towards achieving the objectives of Goal 15: Life on Land. The methodology used for this paper is purely doctrinal. Analytical method has been adopted to analyse the primary sources. Secondary sources like reports, books, journal are also examined for the purpose of this research.

Keywords: *Environmental litigation, Sustainable Development Goal 15, Indian Judiciary, Constitutional environmentalism, interpretation.*

INTRODUCTION:

Environment furnishes all essentials for human life, the relationship between humans and nature has always been deeply interconnected. A healthy territorial ecosystem is necessary for sustaining economies, to prevent desertification and for the well-being of human and planet as living organism relies on a sound environment to flourish. However, the world today is confronted with a threefold planetary crisis- climate change, biodiversity and ecosystem loss, and rising pollution. World's original forest cover has significantly declined leading to disruptions in the balance of healthy ecosystem. Resources of the nature are being exploited unsustainably in the name of development. These challenges undermine the enjoyment and protection of human rights and intensify environmental injustices across the globe. Conservation of world's territorial ecosystem, forests, biodiversity can help to tackle these issues, including growing climate injustice and disappearance of countless species from nature.

In response to these global issues, the United Nations adopted the Sustainable Development Goal (SDGs), comprising 17 interlinked goals that inspired all the countries to collaboratively work towards a safer and sustainable world. Among these, SDG 15 particularly focuses the protection, restoration and promotion of ecosystem, biodiversity and forest, which are the most important components of nature.⁷

In India, the Constitution, through its Fundamental Rights, Directive Principles of State Policy (DPSP), and Fundamental Duty reflects a constitutional vision that recognizes the importance of environmental protection. Over the time, the Indian Judiciary has interpreted Article 48-A, Article 21 expansively to meet the evolving Environmental challenges and to

⁶The State of Bihar and Others v. Pawan Kumar and Ors., INSC 713 (2021).

⁷SDG 15: Life on Land, NAMAN JAIN (Aug. 26, 2025), <https://namanjain.in/2025/08/26/sdg-15-life-on-land/>.

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

align the national commitments with global standards such as SDG-15. The Supreme Court and High Courts, empowered by Article 32 and 226 have actively reviewed state actions, protected environmental rights and developed innovative legal principles through Public Interest Litigation and Suo Motu interventions and contributed to Environmental Jurisprudence. The major institutional developments in this regard are the National Green Tribunal 2010, that enacted to ensure speedy and effective disposal of environmental cases. Thus, the Indian judiciary gradually developed concepts such as 'Environmental Jurisprudence', 'Environmental Justice' for the protection of nature, biodiversity, wildlife in India thereby reinforcing the Constitutional vision and strengthening India's commitment to achieving SDG-15.

RESEARCH OBJECTIVES:

- a. To understand the scope and significance of SDG-15 in the Indian context.
- b. To examine the constitutional framework and vision relating to environmental protection in India, with specific reference to SDG-15.
- c. To analyze the role of Indian judiciary towards achieving the targets of SDG-15 through landmark judgements.

RESEARCH QUESTIONS:

- a. What are the scope and significance of SDG-15 in the Indian context?
- b. How does the constitutional vision relating to environmental protection reflect India's commitment to SDG-15?
- c. How has the Indian judiciary interpreted constitutional mandates to develop environmental jurisprudence aligned with SDG-15?

RESEARCH METHODOLOGY:

The study primarily adopted doctrinal research methodology, using analytical and descriptive approaches to assess environmental principles and the contribution of Indian judiciary. Since many of the environmental principles has been evolved mainly from international conventions and documents, the research relies on a wide range of primary sources chosen from these conventions. The part of decisions of Indian courts has been relied upon original judgments. Secondary sources of the research involve an extensive study of the relevant

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

<https://www.ijalr.in/>

literature including books and various national and international journal articles, commentaries and other scholarly materials.

SDG-15: LIFE ON LAND:

Sustainable Development Goals are a global call to action to shift the current flow in which the world is moving and to make a development benefit to all and preserving the planet for future generations.

SDG 15 mainly focuses on four factors: protect, promote, restore and sustainable use. These four factors work towards⁸:

- a) Ecosystem which means a natural system that made up of all the biotic such as plants and animals, and the abiotic, such as air, sunlight, water, and minerals within a shared environment.⁹
- b) biodiversity,
- c) and mountain eco-systems, achieving a "land defilement impartial world" by restoring corrupted timberlands and land lost to drought and flood.

SDG-15 AND INDIA'S SUSTAINABLE DEVELOPMENT AGENDA:

India's progress towards achieving SDG 15 is reflected by tangible progress across afforestation, conservation, sustainable farming, community participation, urban development, global collaboration, research and scientific innovation. The country remains firmly committed to implement the SDG 15 in collaboration with all stakeholders adhering to specified timelines and the highest standards. Its objectives are part and parcel of country's long-standing Constitutional vision and national development priorities.

India has set up a strong institutional mechanism for policy guidance, implementation and monitoring the progress of the SDG 15. NITI Aayog, provides a national leadership and coordination, the premier think-tank of the Government of India (GOI), while the Ministry of Statistics and Programme Implementation (MoSPI) develops national indicator framework (NIF) for monitoring the progress. The Ministry of Environment, Forest and Climate Change (MoEFCC) act as the central authority within the GOI, accountable for planning,

⁸*Id.*

⁹*What Is an Ecosystem? - Internet Geography*, <https://www.internetgeography.net/topics/what-is-an-ecosystem/> (last visited Nov. 12, 2025).

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

coordinating, and supervising the administration of the country's policies and programmes related to environment and forest.

India is one of the world's 17 mega-biodiverse nations, hosting 8% of global biodiversity.¹⁰ The forest cover 24.62% *i.e.* 80.9 million hectares (FSI 2021). There are 107 National parks, 573 Wildlife Sanctuaries, 115 Conservation Reserves, and 220 Community Reserves (NWDC 2022) covering approximately 5.32% of geographical area of the country.¹¹ India is continuously working towards fulfilling the Aichi Targets under the Convention on Biological Diversity and remains committed to the implementation of Nagoya Protocol for fair and equitable sharing of benefits arising from the use of genetic resources and traditional knowledge.

Following are the two main projects by MoEFCC where India primarily aimed at conservation of land ecosystem, which are:

- a) National Afforestation Programme¹², and
- b) National Programme on the Integrated Development of Wildlife Habitats¹³ and;

Along with these there are various umbrella schemes including Project Tiger, Project Elephant, Project Dolphin, Project Lion under the ambit Development of Wildlife Habitat which have served as flagship efforts in species conservation.¹⁴

In India, people living in degraded lands faces serious challenges, particularly related to livelihood stability and food security. According to the *Desertification and Land Degradation Atlas of India* (SAC 2021), about 97.85 million hectares, or 29.77% of the country's geographical area, was affected by land degradation in 2018–19.¹⁵ The extent of desertification and land degradation increased by 1.45 million hectares (0.44% of the total area) between 2011–13 and 2018–19.¹⁶ In 1994, India became a signatory to the UN Convention to Combat Desertification (UNCCD) and ratified it in 1996. The National Action Plan to Combat Desertification, 2022 provides an updated and comprehensive framework building on the 2001 plan, aligning with India's commitments through forestry and related interventions. To address land degradation and achieve Land Degradation Neutrality targets,

¹⁰India's Wildlife Conservation Milestones, (2025).

¹¹*Id.*

¹²Schemes for Increasing Forest Resources, (2016).

¹³*Id.*

¹⁴Ministry Achieves 100 Days Target on Integrated Development of Wildlife Habitats, (2024).

¹⁵INDIA'S NATIONAL PLAN TO COMBAT DESERTIFICATION AND LAND DEGRADATION THROUGH FORESTRY INTERVENTIONS (2023), NAP.

¹⁶*Id.*

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

<https://www.ijalr.in/>

the MoEFCC issued the *Guidelines for a Convergent Approach for Greening India*. These guidelines aim to integrate all afforestation and eco-restoration programmes.¹⁷

GOI has also adopted several steps through legislation in the view of achieving the objectives of SDG 15:

- i. 1927 Indian Forest Act¹⁸
- ii. 1972, Wildlife (Protection) Act¹⁹
- iii. 1980 Forest Conservation Act²⁰
- iv. 1986 Environment (Protection) Act²¹

CONSTITUTIONAL FRAMEWORK AND VISION UNDERLYING SDG-15

Initially, Indian Constitution was not containing any specific provisions on Environment and nor did it use the term Environment. Nevertheless, protection and improvement of the environment is a constitutional mandate and a devotion for a nation that reflect to the ideals of a welfare State. Additionally, various constitutional amendments, and judicial interpretation has expanded provisions of Constitution to develop on Environmental Jurisprudence.

a) Article 14 and relation with Environmental Justice²²:

Principle 1 of the UNs Conference on the Human Environment (Stockholm, 1972)²³ recognizes the concept of equality in the area of environment and calls upon all nations to eliminate discrimination while ensuring environmental justice for all. The Indian Constitution upholds the Right to Equality under Article 14, guaranteeing equal protection of the laws to every individual without discrimination. This implies that any state action concerning the environment must adhere to the principle of equality, thereby aligning the constitutional mandate with the essence of Principle 1 of the Stockholm Declaration.

b) Article 19 (1) (a) and Environment²⁴:

Article 19(1) (a) of the Indian Constitution provides Right to Know under Freedom of Speech and Expression as Fundamental Right to the people of India.²⁵ Right to know has a close link

¹⁷*Id.*

¹⁸Indian Forest Act, 1927, Act No. 16 of 1927.

¹⁹Wild Life (Protection) Act, 1972, Act No. 53 of 1972.

²⁰Forest (Conservation) Act, 1980, Act No. 69 of 1980.

²¹Environment (Protection) Act, 1986, Act No. 29 of 1986.

²²*Environment Protection under Constitutional Framework of India,*

<https://www.pib.gov.in/newsite/printrelease.aspx?relid=105411> (last visited Nov. 15, 2025).

²³*Declaration of the United Nations Conference on the Human Environment, 1972, (1989).*

²⁴*Environment Protection under Constitutional Framework of India, supra note 16.*

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

with Right to life, particularly in environmental matters where the governmental decisions relating to providing permission for the establishment of hazardous industries, construction of dam or nuclear power, thermal power plants may affect health, life and livelihood of the people, animal and can cause environmental destruction. As for such construction requires huge land clearance. Therefore, there is a requirement of wide publication of such information which is supported by right to know. Furthermore, it is important to mention here that Principle 10 of 1992 Rio declaration emphasizes that "Environmental issues are best handled with participation of all concerned citizens, at the relevant level. At the national level, each individual shall have appropriate access to information concerning the environment that is held by public authorities, including information on hazardous materials and activities in their communities, and the opportunity to participate in decision-making processes. This is new jurisprudence and is called "Jurisprudence of Masses". States shall facilitate and encourage public awareness and participation by making information widely available. Effective access to judicial and administrative proceedings, including redress and remedy, shall be provided."

Majority of the environmental related cases came before courts through PILs, where citizens exercised their freedom of speech and expression, sometimes through sending letters directly to the Supreme Court or by filing a petition. Article 19 (1) (a) also includes freedom of press, whereby media plays a great role in addressing the environmental related cases including pollution, injustice, climate change, conservation of ecosystem. The public opinion and media as the fourth pillar of democracy have played a significant role in case of positively influencing public opinion on environmental cases in India.

c) Article 21 and Environmental Protection:

Article 21 has been a great principle for upholding environment protection and promotion. 'Right to Life' declares that - "No person shall be deprived of his life or personal liberty except according to procedure, established by law".²⁶ Supreme Court in its first case named, *Rural Litigation and Entitlement Kendra*²⁷ broadened the scope of Article 21 to encompass the right to a clean and healthy environment. Subsequently, in many other cases the Supreme Court explicitly held that the right to life under Article 21 includes the right to a wholesome, pollution-free environment and the right to pollution-free water and air and the significant

²⁵Article 19 in Constitution of India, <https://indiankanoon.org/doc/1218090/> (last visited Nov. 15, 2025).

²⁶India Const. art. 21.

²⁷*Rural Litigation and Entitlement Kendra Dehradun & Ors. v. State of U.P. & Ors.*, AIR 652 (1985).

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

environmental law principles from International Conventions been established in India which are Polluter pay Principle, Precautionary Principle, doctrine of absolute liability.

d) Article 48-A:

In 1976, under the Indira Gandhi Govt. 42nd Amendment Act passed and the provision relating to environment were included for the first time by adding Article 48-A, in the form of DPSP. Article 48 A states that “the State shall endeavour to protect and improve the environment and to safeguards the forest and wild life of the country”.²⁸

e) Article 51-A (g):

42nd Amendment incorporated the fundamental duties in the Constitution, wherein Article 51-A (g) enshrined the protection of natural environmental as a fundamental duty of every citizen.²⁹

The 42nd Amendment in the Constitution provided two-fold liability *via* directive principles of state policy and fundamental duty.

f) Article 253:

Article 253 provides Parliament with the power to make any law for the entire or any part of India for implementing treaties, agreements or conventions with other nations.³⁰ Parliament has used this view of Article 253 by enacting Air Act, 1981 and Environment Act, 1986³¹ that also reflects some of the principles of Stockholm Conference.

g) Part XIth of the Indian Constitution and Environment:

Part XI of the Indian Constitution encompasses three subject lists, named, Union list, State list and Concurrent list.³² Parliament on central level and state legislatures on state levels are empowered to make rules on such listed subjects. Some of subjects of these lists have the concern to provide a clean and safe environment. For example- State list includes subjects such as- sanitation, public health, agriculture, water supplies, drainage of fisheries and irrigation. Like this- Concurrent list includes subjects as, forest, protection of wild life, mines and mineral developments, population control, family planning, minor ports, factories etc. on

²⁸India Const. art. 48A.

²⁹Environment Protection under Constitutional Framework of India, *supra* note 16.

³⁰India Const. art. 253.

³¹Annapurna Pattnaik, *Constitutional Provisions for the Protection and Conservation of Environment with Important Caselaws*, 4 IJSRST (2018).

³²India Const. Part XI.

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

which Parliament as well as State Legislatures have jurisdiction to make rules. Additionally in condition of conflict and confusion, the Parliament's decision is considered as final.³³

LANDMARK JUDICIAL DECISIONS THAT HAVE INFLUENCED INDIA'S PROGRESS TOWARD ACHIEVING THE OBJECTIVES OF SDG-15

Under Article 32³⁴ and Article 226³⁵, the Supreme Court and High Courts respectively have the provision of writ petition, wherein PILs can be filed by citizens. This is one of the most significant pieces of evidence of judicial activism in India. PIL became a strong pillar for the Indian citizen to address the environment related issues. Even a letter concerning violation of fundamental rights written in postcard may be treated as writ petition by the Supreme and High Courts. The landmark decisions by Supreme Court and High Courts are the witness of the progressive development of India towards achieving the objective of 'life on land'. As Supreme Court of India has said that- "the essential feature of sustainable development such as the 'Precautionary Principle' and the 'Polluter Pays Principle' are part of the Environmental Law of the country".

a) *Vellore Citizen Welfare Forum Case*³⁶:

The first case where the 'sustainable development' doctrine was applied over a dispute that has arisen for some tanneries in Tamil Nadu. Effluents were being discharged from these tanneries in the main drinking water source of Tamil Nadu, *i.e.* the Palar-river. Supreme court in this case also address polluter pay principle and precautionary principle which reflects as a principle in Reo Declaration 1992 against the polluter and recognised that sustainable development is the solution and effective remedy for damaged environment.

b) *Doon valley case*³⁷:

The Supreme Court under this case has stopped mining in a hilly area as due to the mining work, people living there were not enjoying their right to live in healthy environment and it was a disturbance of ecological balance. It was a destruction of their homes, agriculture, land, air, water, cattle and among others.

c) *T.N. Godavarman Thirumulapad, the forest case (2024)*³⁸:

³³*Id.*

³⁴Article 32 in Constitution of India, <https://indiankanoon.org/doc/981147/> (last visited Nov. 15, 2025).

³⁵Article 226 in Constitution of India, <https://indiankanoon.org/doc/1712542/> (last visited Nov. 15, 2025).

³⁶*Vellore Citizens Welfare Forum v. Union of India & Ors*, AIR 1996, SC 2715, (5) SCC 647 (1996).

³⁷*Rural Litigation and Entitlement Kendra Dehradun & ors. v. State of U.P. & ors.*, AIR 652.

³⁸*In Re: T. N. Godavarman Thirumulapad v. Union of India & Ors.*, INSC 178 (Delhi High Court 2024).

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

T.N. Godavarman, known as the 'green man' filed a writ petition in 1995 with the initial objective of protection of forest land of the Nilgiris as it was destroyed by conducting unlawful timber activities and deforestation was becoming a major issue in that region. Although the case continued for more than 20 years and expanded nationwide leading to various Supreme Court directives. The Supreme Court's deliberation in this case marks a pivotal moment in India's environmental legal landscape.

- i. Year 1996³⁹: Established the definition of the word 'forest'.
- ii. Year 1997⁴⁰: Complete ban on felling of trees in northeastern states of India.
- iii. Year 1998⁴¹: Directions issued for closure of sawmills in forest areas and monitoring and licensing of all wood-based industries to control deforestation.
- iv. Year 2000⁴²: Intervention of Supreme Court to protect national parks and sanctuaries, restricting mining or construction in protected areas.
- v. Year 2002⁴³: Establishment of the Central Empowered Committee (CEC) to monitor forest related issues, assist Supreme Court with advice
- vi. Year 2006⁴⁴: Orders of framing guidelines leading to Compensatory Afforestation Fund (CAMPA) mechanism to ensure that money has been paid for deforestation used only for afforestation.
- vii. Year 2008-2010⁴⁵: Supreme Court issues directions to improve tiger habitats and to frame guidelines regarding that.
- viii. Year 2018⁴⁶: Nilgiris Elephant Corridor case where Supreme Court ordered to remove illegal resorts,
- ix. Year 2020⁴⁷: Court questions diversion of large number of forest areas for commercial projects.
- x. Year 2024: Court uphold Public Trust Doctrine by stating that forests are belongs to public and state is the trustee. Court addressed the unauthorize human interventions in

³⁹T.N. Godavarman Thirumulpad v. Union of India & Ors, AIR 1997 SC 1228, SCW 1263 (1996).

⁴⁰*Id.*

⁴¹T.N. Godavarman Thirumulpad v. Union of India & Ors, State of J & K & Ors, AIR 1998, SC 769, SCW 484 (1998).

⁴²*Id.* AIR 2000, SC 1636.

⁴³K.M. Chinnappa, T.N. Godavarman v. Union of India and Ors, AIR 2003 SC 724, (10) SCC 606 (2002).

⁴⁴Rishabh Shrivastava, *Explained: Judgment That Defined "Forests" in India*, THE ANALYSIS (TA) (May 3, 2024), <https://theanalysis.org.in/explained-judgment-that-defined-forests-in-india/>.

⁴⁵*Id.*

⁴⁶*Id.*

⁴⁷*Id.*

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

the Corbett Tiger Reserve, tree felling, illegal construction in forest areas and its misuse. Court orders reconstitution of Central Empowered Committee (CEC) to strengthen guidelines for protection of forest areas.

d) *State of Bihar and others. v. Pawan Kumar and others. (2021)*⁴⁸:

This case is about widespread illegal sand mining operations in Bihar. The respondents had valid leases for sand mining, but the State later cancelled them and restricted mining to prevent over-extraction and environmental degradation. The Patna High Court later permitted mining to resume, but Supreme Court overturned this order stating that mining was being carried out without mandatory Environmental Clearance. Supreme Court also held that illegal sand mining is causing serious ecological damage, such as, riverbank erosion, biodiversity loss. Additionally, Court reiterated the importance of sustainable development and reaffirmed environmental protection as part of right to life under Article 21, principle under Article 48-A, and duty under Article 51-A(g). Court also cited cases like *M. C. Mehta, T.N. Godavarman* in this regard.

e) *Tapas Guha & Ors vs. Union of India & Ors. (2024)*⁴⁹

The Supreme Court held that the Silchar Greenfield Airport Project violated environmental norms as construction began without Environmental Clearance. Court criticized the NGT for failing to intervene the construction. The Court ordered no further construction of the Airport Project until proper clearance is obtained. The case emphasized sustainable development, minimizes adverse ecological impacts due to such development projects and safeguard the well-being of ecosystem and local communities.

f) *Ganga River Pollution Case*⁵⁰

This was the landmark judgement relating to the Ganga river pollution due to tanneries. Justice Venkatramiah imposed mandatory duty upon Municipal Corporation to remove the pollutants from the river and had directed that about 5000 industries which were located near the Ganga River has to install waste treatment plants and pollution control devices.

CONCLUSION

As a developing nation, India needs steady economic progress, yet it must also protect its ecosystems, biodiversity, and natural resources from degradation. The combined strength of

⁴⁸*The State of Bihar and Others v. Pawan Kumar and Ors.*, INSC 713 (2021).

⁴⁹*Tapas Guha & Ors vs. Union of India & Ors*, 6 S.C.R. 75; INSC 399 (2024).

⁵⁰*M.C. Mehta and anr v. Union of India & ors*, AIR 1086, SCR (1) 819, SCC (1) 395 (1986).

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

India's Constitutional framework and judicial interventions has significantly advanced the aims and objectives of SDG-15. Through progressive and landmark decisions of the Indian courts, has consistently reiterated that national development cannot come at the cost of environmental harm. The vision of a welfare nation, as conceived by the drafters of the Constitution, extends beyond economic and social advancement. It also confines the protection and promotion of a healthy and safe environment for all. Therefore, growth in every sector must move forward in harmony, without undermining ecological balance. Such equilibrium can be achieved when individuals uphold constitutional values and perform their duties as responsible and environmentally conscious citizens. Responsibility for safeguarding life on land does not rest solely with the government; but also, it is a Fundamental Duty of every citizen. Citizens play a key role in conserving nature, including by filing environmental litigation and public interest petitions, which have developed as powerful instruments of environmental justice.

For general queries or to submit your research for publication, kindly email us at ijalr.editorial@gmail.com

<https://www.ijalr.in/>