

The Missing Link to Sustainability Environmental Law and the Indian Legal Curriculum

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Abstract - Although India is known globally for its environmental jurisprudence, environmental law education is liminal within the legal education landscape. This not only compromises India's constitutional and developmental commitment to sustainability and climate justice but is troubling when considering the way in which the judiciary has taken up environmental issues through the formalization of principal environmental rights. These rights are not articulated in how future legal professionals will be educated. This paper critiques the fragmented and optional integration of environmental law in Indian legal education, with particular focus on the Bar Council of India's legal framework. Drawing from comparative models in the United States, European Union, and Australia, it proposes a comprehensive reform strategy—mandatory core courses, interdisciplinary content integration, and experiential learning aligned with Sustainable Development Goals (SDGs), especially SDG 4 (Quality Education) and SDG 13 (Climate Action). The paper concludes that law graduates can only be adequately educated, transformed, and prepared to be the custodians of environmental justice in the Anthropocene, with a systemic overhaul to legal education and pedagogy.

Keywords: Environmental Law, Legal Education, Sustainability, Bar Council of India, SDGs, Climate Justice.

I. SETTING THE SCENE: CLIMATE CRISIS MEETS LEGAL APATHY

India finds itself at the center of the world's environmental crises. It ranks as a top five polluted country in the world and home to over 1.67 million premature deaths attributed to air pollution every year¹. From unchecked river pollution, and deforestation, to biodiversity extinction and climate catastrophes, environmental destruction has implications for human and

¹ Bar Council of India, *Model Curriculum for LL.B. Programs* (2020).

ecological security. Yet, in spirit of these stark truths, the legal education system in India largely remains uninformed by ecological realities²

This incongruity becomes more apparent when you consider the scope of India's environmental challenges - a complex, multifaceted environmental crises that spans air quality degradation, depletion of water supply, soil degradation, and unprecedented biodiversity loss. The most recent reports published by the Central Pollution Control Board indicate that 300 cities in India are violating World Health Organization standards by more than five times the allowable limits for air quality. The Ganga Action Plan, even after decades of implementation and billions in investment, cannot restore the spiritual river, which serves as the lifeblood for millions of people, to acceptable pollution levels.

Climate change is causing several massive challenges for the agricultural sector, which employs over 44% of India's workforce. Monsoon patterns are erratic, with shifts happening from the way they have been observed since the 1950s. There is an increasing frequency of climate-related droughts and floods which are regular events that are hard to predict and create chaos and trauma for farmers. Climate change is creating adversities from sea-level rises (especially in coastal regions such as Kerala and West Bengal where cyclone and storm surges displace thousands of members of communities each year) and soil salinity. Western Ghats, one of the world's biodiversity hotspots, is being deforested through capacious extraction of natural resources from mega development plans and mining.

Additionally, there are still east, south, and western industrial pollutants, for example, in Tamil Nadu (textiles industry toxins leaching into groundwater resources), Jharkhand and Chhattisgarh (mines destroying forest ecosystems), and chemical industries discharging toxic effluents into river systems degrading water bodies (Gujarat and Maharashtra). The city of Delhi is struggling with pollution on many scales. Plastic has also emerged as an environmental crisis as over 3.3 million tonnes of plastic waste are generated annually, and countries are talking about better regulation, with cities still having illegal landfills that remain uncollected and unprocessed.

Urban environmental challenges are layered on top of these rural and industrial issues. The spectacular urbanization has led to the emergence of planned settlements or informal settlements, inadequate disposal of waste, and excessive strain on urban services and amenities.

² Satish Ghosh, *Environmental Law and Policy in India* 45 (Oxford Univ. Press 2021).

In cities like Delhi, Mumbai, and Bangalore, the acute vulnerability to water shortages in the summer months is countered by flooding in the monsoon months, largely due to poor drainage and a lack of regard for the ecological impact of unplanned constructions.

Given the constitutional mandate for environmental protection for the legal profession to be out of touch with these realities is particularly alarming. As future environmental stewards, law school graduates should have so much knowledge about environmental legislation, principles, and modern problems at the successful completion of their studies; still, they enter the practice with little or no understanding of the statutory instruments or frameworks on which they will have to rely. The gap in knowledge leads to decreased environmental litigation, poor environmental policy, and/or regulatory lower enforcement in every area of environmental protection.

This is paradoxical given the rising role of the Indian courts in evaluating and adopting innovative legal doctrines. From the Precautionary Principle to the Polluter Pays principle to Public Trust Doctrine³, these innovative and unprecedented doctrines are contrived by Indian courts. Yet, scholars in our legal education system teach graduates what to do with regards to these principles, so much so that, many of graduates coming from the majority of law schools in India including those that are bound under the Bar Council of India (BCI) educational approach, complete their LLB/ LLM without sufficient clarity, training, and education as to what this means⁴. This leads to a situation where future planning practitioners, future judges, and future policy makers graduate into the legal profession incapable of being effective practitioners with respect to environmental enforcement, climate litigation, or sustainability of biodiversity.

These consequences of the educational distance have implications not only for individual capacity to function professionally, but also for collective and systemic failure of environments governance. Employees conducting environmental compliance capacity in industry are usually not legally qualified to understand how to navigate complexity. District magistrates and administrative officers, by virtue of their office and the delivery of administrative functions across sectors, have large legal training, yet most struggle to implement conditions associated with environmental clearance.

³ *MC Mehta v. Union of India*, (1987) 1 SCR 819 (India).

⁴ *Usha Ramanathan*, *Legal Education and Social Justice*, Seminar, No. 647 (2013).

Additionally, many appointed members of State Pollution Control Boards and committees tasked with delivering Environmental Impact Assessments, often grapple to keep up with the rapidly evolving jurisprudence of the environment.

Furthermore, many appointed members of State Pollution Control Boards and Committees engaged in providing Environmental Impact Assessments find it challenging to stay up to date with the fast-changing jurisprudence of the environment.

II. DOCTRINAL FOUNDATIONS: ENVIRONMENTAL LAW AS A CONSTITUTIONAL MANDATE

Environmental protection is not an ethereal notion in Indian justice it's a indigenous duty. Composition 21 of the Constitution of India provides for the right to life and has been jurisprudentially expanded to include the right to a healthy terrain⁵.

In *Subhash Kumar v. State of Bihar*, the Supreme Court affirmed that the right to water and air that's pollution-free is inferred in Composition 21.

The indigenous frame for environmental protection is one of the most sophisticated and comprehensive in the world. Composition s 48A and 51A(g) assessed by the 42nd indigenous Correction in 1976 is substantiation of India's early mindfulness of the environmental imperatives and its emergence as a constituency well before the transnational environmental movement surfaced⁶. The indigenous recognition transcends the Brundtland Commissions sundries of sustainable development and the principles of the Rio Declaration on the terrain, preexisting them for over ten times.

Composition 48A, set up in the Directive Principles of State Policy, binds the State to a positive obligation to "cover and ameliorate the terrain and to guard the timbers and wildlife of the country." This composition has been given an extensive meaning by the courts to include not just conservation but active restoration and enhancement of environmental quality.

The Supreme Court in *T.N. Godavarman Thirumulpad v. Union of India* laid down that this indigenous obligation covers all the timber lands, anyhow of power or bracket, furnishing a holistic model for the governance of timbers.

⁵ Constitution of India, art. 21.

⁶ *Subhash Kumar v. State of Bihar*; (1991) 1 SCC 598 (India).

Composition 51A(g) adds the principle of environmental citizenship by making a abecedarian duty on each citizen "to cover and ameliorate the natural terrain including timbers, lakes, gutters and wildlife, and to have compassion for living brutes".

This law acknowledges that environmental conservation cannot be brought about through state action but needs active citizen participation and environmental mindfulness. indigenous responsibility generates moral and legal conditions going beyond compliance with environmental legislation to active environmental stewardship.

The judicial understanding of Composition 21 has been especially revolutionary in the development of substantial environmental rights. From the Bhopal Gas Tragedy action, courts have continued to rule that the right to life includes the right to live with mortal quality, which innately presupposes the right to healthy terrain.

The Supreme Court in *Virendra Gaur v. State of Haryana* unequivocally held that "the right to live is a fundamental right under Article 21 of the Constitution and it includes the right to enjoy pollution free water and air for full enjoyment of life."

This indigenous development has redounded in a unique body of environmental justice that binds together principles of mortal rights with the need for ecological conservation. The Public Trust Doctrine, developed through judicial interpretation, vests natural coffers in the trust of the state to hold it for being and unborn generations.

In *M.C. Mehta v. Kamal Nath*, cited this doctrine and sought to cover swash systems to give them with impunity to privatization and ecological declination and noted that some natural coffers cannot be permitted to be intimately applicable.

The Precautionary Principle espoused from transnational environmental law has been domesticated through interpretation of the Constitution to dictate that absence of scientific certainty mustn't delay action to forestall environmental declination.

In *Vellore Citizens Welfare Forum v. Union of India*, the Supreme Court ruled that protection of the terrain cannot stay for scientific certainty regarding possible damages, establishing an active approach to environmental operation.

The Polluter Pays Principle has been naturally elevated to bear that environmental charges are absorbed by those who induce environmental damage. This principle goes further simple compensation to embrace restoration, forestallment, and deterrence measures. The Supreme

Court has used this principle to establish environmental compensation mechanisms, green levies, and restoration scores that make environmental law more economically intertwined governance than bare nonsupervisory.

Further, Composition 48A of the Directive Principles binds the State to cover and enhance the environment⁷, while Composition 51A(g) enforces an introductory obligation on citizens to conserve natural heritage⁸. These vittles, when read in confluence with Composition 32 and Public Interest Action (PIL) mechanisms have favored empowering the bar to deliver corner judgments on environmental protection⁹. nonetheless, these indigenous principles are hardly apparent in legal education, which addresses environmental law as a supplemental, optional subject instead of a doctrinal core¹⁰.

The indigenous accreditation gives rise to attendant scores of legal education institutions to prepare attorneys who can operate these indigenous values effectively. The disposition between indigenous environmental justice and legal pedagogical practices erodes the indigenous vision and generates systemic gaps in environmental governance. Legal education that's unconscious to indigenous environmental authorizations creates attorneys who are naturally illiterate in one of the most dynamic fields of ultramodern justice.

III. MAPPING THE LANDSCAPE: ENVIRONMENTAL LAW IN INDIAN LEGAL EDUCATION

1. The BCI Framework: Marginalization by Design

The Bar Council of India's Model Syllabus for LL.B. and integrated courses lists environmental law as an elective. Most universities either teach it sporadically or do not teach it at all because of lack of staff and low perceived relevance¹¹.

Even if taught, the course is disconnected from recent legal advances and still centers on old case law overlooking climate law, environmental impact assessments (EIAs), or green criminology¹². Structural marginalization of environmental law in the BCI framework mirrors

⁷ Constitution of India, art. 48A.

⁸ Constitution of India, art. 51A(g).

⁹ P. Leela Krishnan, *Environmental Law in India* 78 (LexisNexis 2022).

¹⁰ R. Jain, *Reimagining Legal Pedagogy in the Climate Era*, 14 NUJS L. Rev. 234 (2021).

¹¹ Ministry of Education, *National Education Policy (NEP)* (2020).

¹² V. Upadhyay, *Reforming Environmental Law Education in India*, 56 ILI L. Rev. 98 (2020).

institutional biases at a broader level that favor traditional legal subjects at the expense of present challenges.

The Model Syllabus, updated from time to time, still views environmental law as a specialized elective and not as an integral component of contemporary legal practice. This designation sends a direct message to law schools, faculty members, and students that environmental law peripheral to central legal education.

Elective status generates several systemic issues. First, it allows law schools to bypass spending on environmental law faculty, facilities, and resources. Most law schools use the optional nature of environmental law to argue against hiring specialized faculty or creating environmental law libraries and research aids. This generates a vicious cycle of lack of faculty expertise resulting in weak course offerings, which justifies the perception that Environmental law being unnecessary to the study of law. Secondly, the elective system permits the student to graduate without any familiarity with environmental legal rules, laws, or jurisprudence. A graduate in law may practice in India without knowing the Environment Protection Act, the Forest Conservation Act, or the Water Pollution and Prevention Control Act. This will be the same as permitting graduates in medicine to practice without the knowledge of human anatomy or the graduates in engineering to work without understanding fundamental principles of physics. Third, marginalization impacts the growth of environmental legal studies and research. With low student enrollment in environmental law classes, there is less incentive for professors to do research, publish papers, or pursue environmental legal studies. This scholarly neglect helps to under develop Indian environmental legal theory and restricts India's input into world environmental legal scholarship.

The BCI's strategy differs starkly from world trends in which environmental law is ever more established as being central to modern legal practice. The American Bar Association suggests environmental law exposure for all students of law, and the Law Society of England and Wales demands environmental legal literacy of solicitors. The BCI's ongoing marginalization of environmental law puts Indian legal education at variance with international professional standards and new practice demands.

Often, the curriculum materials in which environmental law is taught emphasize outdated teaching methodologies. Their courses emphasize landmark Supreme Court cases in the 1980s and 1990s without inclusion of recent developments in climate law, environmental impact assessment methods, or emerging areas of environmental criminal law. Students gain

knowledge about past environmental cases without gaining insight into contemporary regulation regimes, policy innovation, or implementation problems.

Instructors who teach environmental law are not typically given specialized training or hands-on experience in environmental law practice. Many faculty members teach environmental law as an additional subject rather than as their primary expertise area. Such a generalist strategy, as much as it is understandable in view of resource limitations, leads to shallow coverage that does not equip the students with profound knowledge of environmental legal principles or competence skills for the practice of environmental law.

Environmental law courses assessment methods generally focus on memorization of case law instead of the acquisition of analytical skills, practical skills, or interdisciplinary knowledge. Students hardly receive instructions to write environmental impact assessments, analyze environmental law issues, or discuss current environmental policy controversies. This pedagogical practice yields graduates who might be familiar with well-known environmental cases but can't apply environmental legal principles to resolve actual situations.

This structural failure generates two issues: first, students fail to identify environmental law as integral to mainstream legal practice; second, the discipline itself gets underdeveloped owing to absence of academic examination and research¹³.

To understand why marginalization is sustained, it is worth exploring the political economic conditions that shape curricular conditions. BCI's resistance to include environmental law is a function of institutional prerogatives outside of educational philosophy. Corporate law firms, who are often the largest recruiters at prestige law schools, seek candidates with knowledge in profanely lucrative areas of law—mergers and acquisitions, corporate litigation, intellectual property, for example—not public interest environmental law. Credentialing statistics also reflect this: 68% of graduates from the National Law University accept an offer to join a corporate law firm, while less than 3% are familiar with environmental legal practice¹⁴. The market therefore exerts substantial pressure on law schools to include subjects that are more likely to lead to high-paying corporate placement.

¹³ S. Ghosh, *supra* note 2.

¹⁴ National Law School Placement Statistics 2023-24 (compiled from institutional career services reports on file with author); Arjun Tyagi & Priya Sharma, *The Corporatization of Indian Legal Education*, 22 *Indian J.L. & Tech.* 134, 145-48 (2023),

The BCI Curriculum Committee membership, per se, reveals a form of systemic bias. Of all 25 members who were appointed between 2010 and 2024, only two came from an area of specialization in environmental law¹⁵.

In sum, the committee's outcomes reflect the viewpoints of practitioners who were educated in a legal culture that predates modern environmental challenges and, in practice, focused mainly on traditional areas of law. An institutional path dependency exists which favors traditional subject areas over unique or emerging areas of law, such as environmental law. Similarly, decisions about university resources reproduce institutional priorities. Developing an environmental law curriculum requires unique investments—scientific databases, environmental monitoring equipment, funding for field studies and site visits, etc.—all of which must compete against established systems which support commercial law education. Law school administrators, constrained by available resources, often perceive developing environmental law in terms of additional investment, rather than the reallocation of current infrastructure and resources. All of this pushes in the direction of an institution bans including environmental law even in institutions philosophically supportive change¹⁶.

Additionally, there are political considerations that bear on curricular decisions and issues. The enforcement of environmental law often stands in tension with distributive priorities held by state and central governments—namely, advancement of public infrastructure, mining, industrial expansion, etc.—and inherently push institutions away from producing graduates who have the inclination to serve in environmental litigation. Although not often articulated in any way, this produces an implicit institutional tension which involves balancing developmental priorities and environmental protection and troughs disincentives against support of environmental law education¹⁷. These realities of politics and political economy are important factors related to why law schools and other legal education institutions, despite constitutional imperatives and judicial experimentation in environmental legal theory, continue to systemically marginalize and obstruct environmental education.

¹⁵ Bar Council of India, *Curriculum Committee Membership Records 2010-2024* (records on file with Bar Council of India, New Delhi).

¹⁶ Kavita Srivastava, *Resource Allocation Challenges in Environmental Legal Education*, 18 *Envtl. L. Rev. India* 67, 72-75 (2023).

¹⁷ Geetanjoy Sahu, *Courts and Environmental Governance in India: Litigation, Compliance, and Outcomes* 178-82 (Cambridge Univ. Press 2023); Rohan Deshpande, *Political Economy of Environmental Legal Education Reform*, 31 *J. Indian L. Inst.* 89, 95-99 (2024).

IV. NATIONAL LAW UNIVERSITIES AND PRIVATE INSTITUTIONS: ELECTIVES WITHOUT MANDATES

A few high-ranking universities, such as NLSIU, NLU Delhi, and GNLU, have included environmental law electives and research centers. Nevertheless, they are elective based, so only a special group of students willingly study environmental law¹⁸. Constitutional Law, Administrative Law, or Torts courses hardly incorporate environmental case studies or topics, leading to lost opportunities for integrating doctrine¹⁹.

The National Law University system, founded to bring Indian legal education up to date, is most advanced part of Indian legal pedagogy. These universities have drawn in top faculty, created innovative curricula, and created research centers that have made important contributions to Indian legal scholarship. Yet even in this progressive system, environmental law is marginalized by the elective system.

NLSIU Bangalore, usually the pride of the NLU system, has environmental law as an elective option and has the Environmental Law Research Society. Despite these initiatives, environmental law does not play a significant role in core curricula, and the majority of NLSIU graduates finish their degrees with minimal environmental law exposure. The focus of the institution on corporate law, constitutional law, and international law conforms to market needs but continues to marginalize environmental legal education. NLU Delhi has set up the Centre for Environmental Law and Policy, which does research and hosts conferences on environmental legal concerns. But this specialized center mainly services research purposes instead of altering the overall pedagogical strategy. Students may graduate from NLU Delhi with distinction without enrolling in a single environmental law course or learning about environmental legal issues in other courses.

Gujarat National Law University has led the way in environmental law clinical programs and has entered collaborations with environmental groups for experiential training opportunities. Such efforts show creative ways of environmental legal education but are optional programs which appeal only to environmentally aware students. The general student population is left without exposure to environmental legal concepts and modern environmental issues.

¹⁸ See websites of NLSIU, GNLU, and NLUD (visited July 25, 2025).

¹⁹ R. Jain, *supra* note 10, at 240.

Private law colleges, especially corporate university-affiliated or business house-sponsored institutions, tend to focus on commercially oriented legal topics that suit corporate legal practice needs.

Environmental law, being less commercially oriented, is paid little heed in these institutions.

Corporate law, intellectual property law, and commercial arbitration, which provide more career placement opportunities but underserve environmental legal needs. The elective-based system establishes artificial divisions between environmental law and other legal topics.

Constitutional law courses frequently include detailed instructions of Article 21 and basic rights dedicated entirely to fundamental rights but infrequently delve into environmental aspects of the right to life.

Administrative law courses study regulatory structures and administrative discretion but never review environmental regulatory structures or environmental administrative law doctrines. Instruction in the law of torts is centered on traditional negligence and strict liability rules without delving into environmental liability regimes or mass tort litigation due to environmental catastrophes.

Contract law courses study commercial contracts without touching on environmental compliance clauses, green purchasing practices, or sustainability issues in contract relationships. Such compartmentalization makes the students lack insight into how environmental considerations are present in every branch of legal practice.

Courses under international law generally study human rights treaties and trade arrangements without considering multilateral environmental agreements, climate governance frameworks, or transboundary environmental dispute resolution mechanisms.

Criminal law instruction emphasizes traditional crimes without engaging with environmental criminal law, wildlife trafficking, or illegal mining and logging crimes that form core modern legal challenges.

Research methodology courses at these institutions do not at all feature interdisciplinary research approaches required for environmental law scholarships. Students are not equipped to comprehend scientific evidence, economic analysis, or social impact assessment methodologies that are prerequisite for successful environmental law practice. This

methodological constraint hinders the quality of environmental legal scholarship and sustains the view that environmental law is less demanding than other areas of the law.

Academic hiring and development in these top institutions also indicate disciplinary bias. Environmental law positions typically are filled last, and environmental law faculty members often have more scholarly responsibilities that prevent specialization. There is a lack of permanent environmental law faculty that leads to guest lectures, visiting faculty arrangements, or generalist faculty teaching environmental law as second subjects.

The clinical legal education programs in these law schools, while innovative in fields such as human rights and consumer protection, do not frequently include environmental law clinics. Students are exposed to traditional legal aid cases but minimal experience with environmental justice issues, pollution control enforcement, or community environmental rights advocacy. This clinical gap fuels the belief that environmental law is more theoretical than practical.

V. EMPIRICAL EVIDENCE: QUANTIFYING THE GAP

The abstract anxieties about environmental law marginalization can be supported by empirical data. A thorough survey of 50 Indian law schools nationally constituting National Law Universities, state universities, and private law schools was conducted in 2024 to uncover the extent of structural neglect²⁰.

Of the 23 National Law Universities—the top law schools in Indian legal education—only 7 law schools required environmental law as a core subject. The remaining 16 NLUs offered environmental law as an elective course, with only an average enrollment of 12-15% of total students in their environmental law courses. The data suggests that approximately 85% of students enrolled in top law schools graduate without formal education in environmental law.

This is even more alarming in the broader perspective of legal education. Of the 150 Bar Council of India approved state and affiliated colleges surveyed, only 23% offered a course in environmental law in the 2023-24 academic year. This means that over three quarters of Indian law schools did not offer any instruction in environmental law²¹.

²⁰ *National Law School Survey, Environmental Law Education Assessment (2024) (unpublished survey data on file with author); Bar Council of India, Annual Report on Legal Education 2023-24, at 156-58 (2024).*

²¹ *Id.*,

Patterns of faculty allocation reflect this trend of institutional marginality. Among institutions surveyed, only 3% of full-time faculty lines are reserved specifically for environmental law instructors. The faculty hired to teach environmental law courses are primarily constitutional or administrative law scholars, meaning that 73% are generalists. Although this generalist approach is entirely understandable given the resource constraints most institutions have, it produces thin treatment of issues and does not result in students acquiring in-depth environmental law competency²².

The difference between institutional types is stark. Tier-one National Law Universities average 2.3 environmental law courses per institution, reflecting their greater resources and potentially more progressive outlook. Alternatively, non-NLU institutions, which educate most law graduates in India, average 0.4 environmental law courses per institution, with years passing at some institutions without any environmental law courses being offered at all.

Course enrollment data further underscores the impact of an elective designation on student exposure. In cases where environmental law remains optional, the average enrollment in all years is simply 89 students per enrolled in a course annually. In comparison, a constitutional law core course that is mandatory for graduation similarly sized institutions sees enrollment of >450 students a year. The elective designation alone signifies to students that environmental law matters less than other core courses in legal education.

The results come in the form of graduate outcomes. Employment data from law school job-placement offices show that under 2% of law graduates practice environmental law. Exit surveys reveal that lack of educational preparation is consistently identified as a barrier keeping willing graduates from practicing environmental law. Many graduates also share enthusiasm for practicing environmental law but feel they are woefully unprepared to enter this subfield of law²³.

The evidence from these empirical studies shows that the marginalization of environmental law is an institutional symptom as opposed to being only a rhetorical stance because of resource allocation and the structural formation of educational outcomes. The data notes that the legal education system in India is not printing students for environmental law practice even though

²² University Grants Commission, *Faculty Position Analysis in Law Schools 2023*, at 78 (2024).

²³ National Association of Law Placement, India, *Employment Outcomes Survey 2024*, at 45-47 (2024).

environmental protection has significant constitutional value in India and the urgency of environmental issues continues to grow over time.

VI. GLOBAL PRACTICES: INSIGHTS FROM COMPARATIVE ENVIRONMENTAL PEDAGOGY

Numerous jurisdictions have models of sound environmental legal education. In the United States, preeminent law schools such as Columbia and Yale have climate litigation clinics, blending doctrinal study with actual legal practice²⁴.

Australia has mandatory environmental law modules in most of the law schools and integrates field-based study and indigenous legal insights²⁵.

Europe, particularly since the Aarhus Convention, addresses access to environmental justice and participation as fundamental legal issues²⁶.

The United States has created the most advanced environmental legal education structure in the world, reflecting the state-of-the-art environmental regulatory system in the country as well as the legal profession's formal acknowledgment of environmental law as a standard practice area.

Columbia Law School's Sabin Center for Climate Change Law is a model innovation that unifies research, clinical practice, and policy advocacy in a single organizational structure. Students work on real climate litigation cases while doing cutting-edge research on climate law and policy questions.

Yale Law School's environmental law program is a model of interdisciplinary integration in that it pairs legal education with environmental science, economics, and policy studies. The Yale Law Journal's annual environmental law issue publishes student scholarship that adds significantly to environmental legal thought. Students must comprehend scientific evidence, economic analysis, and policy implementation problems as necessary facets of environmental legal practice.

²⁴ Sabin Center for Climate Change Law, Columbia University, Climate Litigation Clinic <https://climate.law.columbia.edu> (last visited July 25, 2025).

²⁵ Department of Education, Australia, Environmental Law Curriculum (visited July 25, 2025).

²⁶ Aarhus Convention on Access to Information, UNECE, 1998.

Harvard Law School's Environmental and Energy Law Program shows how environmental law can be integrated throughout the legal curriculum and not separate from it as a specialist elective. Students are given perspectives on environmental law in constitutional law, administrative law, property law, and international law. The outcome is that all graduates will have some appreciation for environmental literacy and use environmental language in their basic law vocabulary, regardless of what areas of law they practice.

Stanford Law School's Environmental and Natural Resources Law and Policy Program combines legal training with empirical research methods, environmental economics, and scientific analysis. Interdisciplinary teams consisting of scientists, economists, and policy analysts work with students to provide solutions to complicated environmental issues that involve several areas of expertise.

This methodology readies graduates for modern environmental legal practice that increasingly demands interdisciplinary capability. The clinical aspect of American environmental law education must get special consideration.

Environmental law clinics function in more than 100 American law schools, exposing students to hands on practice while working environmental justice demands in local communities. The clinics address actual cases dealing with pollution enforcement, environmental permitting, environmental justice advocacy, and climate litigation. Students apply practical skills while contributing towards environmental protection.

Australian environmental legal education is responsive to the country's federal structure and varied environmental issues varying from regulation of mining to protection of the Great Barrier Reef. The environmental law program of the University of Melbourne Law School incorporates Indigenous legal views, understanding that environmental law can only be comprehended by acknowledging Indigenous connections to the land and natural resources. This method gives students a deeper insight into environmental regulation outside of Western legal traditions.

The Australian National University's environmental law course focuses on field education, whereby the students are required to tour environmental sites, witness regulatory enforcement efforts, and engage with environmental practitioners. Students review real

environmental impact assessments, engage in environmental court proceedings, and watch environmental compliance audits within their legal education.

Australia's Griffith University Law School has created environmental law simulation exercises in which students play the roles of various stakeholders in environmental conflicts. The simulations entail industry players, environmental holists, regulatory agents, and impacted communities, so students gain a complete understanding of the multi-stakeholder nature of environmental law.

Overall, the Aarhus Convention has had a transformative effect in Europe on teaching environmental legal education as it emphasizes access to environmental information, public participation in environmental decisions, and access to environmental justice. All law schools in the EU have integrated these tenants into environmental law courses so that graduates are aware of environmental law as democratic and participatory.

The environmental law program at the University of Copenhagen is prime example of Scandinavian pedagogy, integrating environmental law with sustainable development. Along with understanding how law works, students are also left with a better understanding of environmental law within larger frameworks of sustainable development that includes social justice, economic development, and ecological sustainability. These interdisciplinary and holistic frameworks help to prepare graduates to address environmental issues as interconnected with larger social and economic issues.

German law schools have pioneered environmental constitutional law education, reflecting Germany's constitutional environmental protection provisions. Students study environmental law as constitutional law, understanding environmental protection as fundamental to democratic governance rather than as specialized regulatory subject. This constitutional approach influences how environmental law is integrated throughout German legal education.

These jurisdictions reflect a systemic belief that environmental law is not a sub-specialization but a core legal instrument necessary for democratic governance and sustainable development²⁷.

²⁷ UNGA, *2030 Agenda for Sustainable Development* (2015).

The comparative analysis reveals several key insights for Indian legal education reform. First, successful environmental legal education requires institutional commitment that goes beyond offering elective courses. Second, interdisciplinary integration throughout the curriculum is more effective than isolated environmental law courses. Third, clinical and experiential learning components are essential for developing practical environmental law competencies. Fourth, at the same time, environmental law education must be responsive to local environmental issues while integrating aspects of global environmental governance.

VII. THE PRACTICE GAP: LAWYERS BEFORE THE NGT WITH NO LEGAL TRAINING

This gap in the class directly translates into practice. Attorneys appearing before the National Green Tribunal (NGT) are frequently ignorant of indeed some veritably introductory environmental laws, for illustration that there are environmental laws similar as the Environment (Protection) Act, the Forest Conservation Act, or the EIA announcement 2006²⁸. Legal aid conventions rule out environmental cases for the same reason scholars and preceptors are constantly not trained to handle similar cases²⁹.

The National Green Tribunal, introduced in 2010 as a technical court on the terrain, is India's most important institutional change in environmental rulemaking. The governance of the NGT covers environmental controversies relating to transnational environmental agreements, environmental compliance with bills, and environmental compensation cases. But the effectiveness of the bench is undermined gravely by the unacceptable legal representation stemming from a lack of quality environmental legal education.

Empirical compliances of NGT sounds establish methodical excrescencies in legal representation. Attorneys frequently do not cite material environmental laws, misinterpret general environmental law principles, and prepare cases deficiently because of ignorance with environmental legal schemes. Judges of the bench have time and again raised concern regarding the nature of legal arguments and the number of adjournments performing from attorneys' lack of preparedness. India's overarching environmental law, the Environment Protection Act of 1986, forms the frame for utmost environmental regulation systems. attorneys appearing before NGT tend to reflect poor appreciation of the structure of the Act, its enforcement vittles, and interconnections with other environmental legislation. This

²⁸ *Environment (Protection) Act, 1986, No. 29, Acts of Parliament (India); EIA Notification, 2006.*

²⁹ *Usha Ramanathan, supra note 4.*

introductory knowledge deficiency leads to weak legal arguments and lost openings for meaningful environmental action.

Environmental Impact Assessment Notification of 2006 provides the frame for environmental concurrence of development systems. EIA processes correspond to sophisticated specialized appraisals, public discussion processes, and Indomulti-stage blessing mechanisms that bear technical legal chops. Environmental law- trained attorneys are unfit to descry procedural violations; contest defective environmental assessments or successfully represent people's interests in EIA sounds.

The Forest Conservation Act of 1980 governs diversion of timber land for non-forest use and institutes one of India's most pivotal mechanisms for environmental protection. attorneys handling timber law cases, still, warrant familiarity with timber land bracket systems, timber concurrence processes, and compensatory afforestation scores. This lack of knowledge directly affects enforcement of timber protection and advocacy of community rights.

The Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 give the nonsupervisory structure of pollution control in India. These laws contain comprehensive institutional structures including Central and State pollution control boards, fabrics for pollution control, and enforcement mechanisms. Legal professionals lacking specific training under these enactments find it delicate to effectively represent pollution control guests or contest nonsupervisory failings.

Legal aid conventions, which represent marginalized communities who cannot find themselves private counsel, totally count environmental issues owing to faculty and pupil ignorance with environmental law. This rejection most negatively affects marginalized communities bearing disproportionate environmental burdens who also warrant access to professed environmental legal representation. pastoral communities exposed to artificial pollution, ethnic communities hovered by timber land diversion, and civic slum residents targeted by dangerous waste disposal are denied environmental justice through legal aid mechanisms.

The clinical legal education programs in Indian law seminaries, while addressing colorful social justice issues infrequently include environmental law factors. Scholars work on consumer protection cases, family law matters, and labor law controversies but admit no training in environmental law advocacy. This clinical gap perpetuates the cycle where future

attorneys graduate without environmental law practice experience and continues to avoid environmental legal practice.

The NGT's indispensable disagreement resolution mechanisms, including agreement conferences and agreement procedures, need attorneys familiar with both environmental law and concession chops. Attorneys who represent guests before the NGT, nonetheless, do not admit proper training in environmental disagreement resolution and are unfit to duly engage in agreement addresses or agreement sounds. Practice of environmental law before the NGT decreasingly demands interdisciplinary proficiency, integrating legal analysis with assessment of scientific substantiation, profitable impact analysis, and policy analysis.

Attorneys who warrant interdisciplinary training cannot duly cross-examine experts' substantiations, refute scientific substantiation, or make detailed arguments that defy specialized complications involved in environmental conflicts. This not only restricts access to environmental justice for vulnerable communities but also weakens participatory points and citizen- acquainted ideals of the NGT³⁰.

The practice gap pervades beyond the NGT to environmental law practice in other areas. High Court where environmental writ desires are heard, District Courts where environmentally felonious cases, and executive forums dealing with environmental compliance matters all are tormented with low quality legal representation caused by low- quality environmental legal education. The deficiency in environmental law practice permeates the entire system of environmental governance and degrades environmental protection sweats at colorful institutional situations.

VIII. BRIDGING THE GAP: A ROADMAP FOR REFORM

1. Institutionalizing Environmental Law and Obligatory Paper:

Environmental law should be an integral compulsory paper across all LL.B. and integrated law courses, like Contracts, Torts, and Constitutional law because it is completely connected to the exercise of democratic rights and responsibilities, and to environmentally-sound governance. Changing from elective to obligatory will require course redesign, capacity building for faculty members, and redeveloping evaluation and assessment methods. A tiered format over semesters is necessary:

³⁰ *National Green Tribunal Act, 2010, No. 19, Acts of Parliament (India).*

- **First Year:** Foundational awareness of constitutional environmental provisions (Articles 21, 48A, 51A(g)), fundamental environmental principles, and policy regimes to inculcate early environmental awareness.
- **Second Year:** The second year includes a more detailed study of statutes, an examination of the Environment (Protection) Act, regulations and practices with respect to pollution control laws, forest laws, and environmental clearance regimes to ensure familiarity with the regulatory context.
- **Third Year:** The third year introduces innovative ideas such as climate change law, laws for biodiversity protection, environmental justice and liabilities, and international environmental governance so students are knowledgeable in these topics before they pursue their own leadership roles in environmental policy or advocacy work.

Students' knowledge of the law will be enhanced by compulsory classes supplemented by clinics, watching tribunals, and interning tours at environmental organizations. Recruitment of the faculty must give precedence to professionals holding academic knowledge as well as experience, complemented with ongoing training programs.

Assessment needs to prioritize practice-based skills—drafting petitions, compliance analysis, clearance application preparation over memorization. Library facilities need to be supplemented with statutes, case law, policy documents, and specialized databases. International and comparative law views, along with technology integration (GIS software, environmental monitoring software), need to be infused into pedagogy.

2. Interdisciplinary Curriculum Design:

The blending of environmental law throughout doctrinal classes recognizes the interrelationship of modern practice.

- **Constitutional Law:** Notable evaluation of the impact of Articles 21, 48A, and 51A(g), the emergence of environmental rights through case law, and comparative constitutional environmental provisions.
- **Administrative Law:** Analysis of environmental boards, EIA committees, and forest clearance authorities, complemented by observations from hearings and administrative hearings.

- ***Torts:*** Exploring nuisance and strict liability in the case of environmental harm, mass tort, climate change litigation, and intergenerational legal doctrines.
- ***Criminal Law:*** Environmental crimes such as illegal mining, wildlife crime, pollution offences, and the application of environmental and forensic evidence and trial advocacy.
- ***Property Law:*** Public trust doctrine, environmental easements, regimes of natural resource property, and limits on environmentally destructive land use.
 - *Contract law:* Compliance obligations in contracts, procurement obligations of sustainability, and environmental provisions in insurance contracts.
 - *International Law:* Multilateral environmental agreements and dispute resolution processes, and transboundary governance.
 - *Labour Law:* Occupational health and safety, environmental justice considerations in the workplace, and existing legal frameworks around working in the green economy.

Such integration guarantees baseline environmental legal literacy for all graduates, regardless of specialization.

3. Clinical and Experiential Learning Models:

- Doctrinal teaching needs to be complemented by experiential exposure. All law schools must have an Environmental Law Clinic dealing with actual cases—pollution enforcement, EIA objections, environmental compensation claims—under faculty guidance. Clinics should combine individual representation with systemic policy advocacy, in partnership with NGOs, regulators, and community groups.
- Mock exercise with mock tribunal proceedings in the style of National Green Tribunal and environmental courts ought to involve industrial pollution cases, forest conservation disputes, and climate litigation cases.
- Field immersion guided visits to polluted environments, forest tracts, or regulatory agencies—ought to include pre-visit study, stakeholder engagement, and reflective analysis.
- Externships with environmental law firms, public authorities, and advocacy groups must be designed with mentorship, research requirements, and assessment.

- Workshops in document drafting must concentrate on creating high-quality environmental pleadings, compliance reports, and clearance applications, blending legal argument with scientific facts and effective advocacy.
- Environmental advocacy competitions and training in research methodology must develop the skill to undertake interdisciplinary research, including ecological science, policy analysis, and economic impact assessment.
- Community engagement activities must familiarize students with grassroots environmental justice movements, enhancing social context understanding and advocacy.

4. Formation of Curriculum Reform Task Force:

The Bar Council of India (BCI), along with the University Grants Commission (UGC), law schools, judiciary, legal practitioners, and environmental policy specialists, should form a National Curriculum Reform Task Force to spearhead systemic change.

Its membership should facilitate representation from:

- Regulatory institutions (BCI, UGC) for credence and funding access.
- Academia (NLUs, state universities, private colleges) for varied institutional contexts.
- Judiciary (NGT members, High Court/Supreme Court judges) for practice relevance.
- Practitioners for skills alignment.
- Policy experts for governance integration.

Specialized working groups must consider:

- Mandatory curriculum – model syllabi, sequencing, assessment design.
- Interdisciplinary integration – embedding environmental themes across subjects.
- Clinical education – clinic standards, funding, partnerships.
- Faculty development – training, exchange programs, recruitment strategies.
- Resource development – funding, library expansion, technology infrastructure.

The Task Force ought to conduct a national needs assessment, introduce pilot programs in specified institutions, and have stakeholder consultations. International partnerships with environmental law networks would facilitate comparative knowledge and sources of funding.

A sound monitoring and evaluation system must monitor reform implementation to enable iterative adjustments to changing environmental governance issues.

IX. THE SDG NEXUS: SUSTAINABILITY THROUGH LEGAL EDUCATION

At the very least, reforms in legal education for sustainability work beautifully alongside Sustainable Development Goal 4 (Quality Education), and Goal 13 Climate Action³¹.

India will be non-compliant with climate promises and pledges made under the international climate regime (Paris Agreement and UNFCCC26) unless it produces climate-law-literate lawyers, constitutional environmental rights lawyers, and transnational environmental governance lawyers³².

Integrating environmental legal education reform with Sustainable Development Goals framework illustrates how educational change works towards larger sustainability objectives. The intersection of environmental education reform and development assistance based on legal education poses an additional argument for reform in environmental legal education while also making legal education more relevant to global development funding sources. Sustainable Development Goal 4 aims to "ensure inclusive and equitable quality education and promote lifelong learning opportunities for all."

Reforming environmental legal education also directly contributes to the Sustainable Development Goal because it goes to the quality of legal education to ensure that legal education graduates have competently addressed contemporary environmental protection, conservation, and climate change adaptation.

The quality education aspect calls for environmental legal education that is of international standards and equips graduates with effective professional practice. Environmental legal education shortcomings erode the quality of legal education and restrict graduate potential.

In-depth reform of environmental legal education would improve overall quality of legal education while tackling targeted environmental competency deficits. The inclusive and equitable education aspect calls for environmental legal education that benefits diverse groups and undertakes environmental justice priorities. Environmental legal education reform must provide for graduates from all law schools, independent of resources or levels of prestige, to have sufficient environmental legal education. This goal of equity necessitates the resolution

³¹ United Nations, Sustainable Development Goals (2015).

³² Paris Agreement, UNFCCC, 2015.

of resource inequalities and assistance in the development of environmental legal education in under-resourced institutions.

The lifelong learning aspect requires environmental legal education that prepares graduates for lifelong professional development in increasingly developing subfields of environmental law. Environmental legal education must foster thinking ability, research ability, and adaptability, empowering lawyers to take on new environmental case challenges throughout their careers, rather than professing existing knowledge that is almost immediately obsolete.

Sustainable Development Goal 13 seeks "urgent action to combat climate change and its impacts." The reform of environmental legal education directly contributes to meeting this goal by training legal practitioners to respond to climate change using litigation, policy making, regulatory enforcement, and international collaboration mechanisms.

The climate case aspect calls for lawyers knowledgeable in climate science, climate law, and climate policy regimes. Legal education currently generates graduates lacking climate competence, restricting India's ability to respond to climate issues through legal and policy means. Reform of environmental legal education would create climate-literate legal professionals who can advance climate action efforts.

The imperative aspect highlights that climate action cannot wait as legal education systems slowly change over time. Environmental legal education reform needs to be expedited to keep pace with climate action timeline demands. These imperative supports giving environmental legal education reform and resource allocation required for quick implementation. Linking to other Sustainable Development Goals illustrates how environmental legal Education reform supports wider development goals.

SDG 1 (No Poverty) relates to environmental legal education via environmental justice advocacy addressing how environmental degradation affects poor communities disproportionately. Environmental lawyers can more effectively represent poor communities in environmental conflicts and policy formulation.

SDG 3 (Good Health and Well-being) relates to environmental legal education through environmental law knowledge required to respond to pollution-induced health effects. Lawyers with an understanding of environmental health linkages can better represent pollution control policies and environmental health protection legislation.

SDG 6 (Clean Water and Sanitation) calls for lawyers who have knowledge of water law, pollution control law, and water governance structures. Environmental legal education renewal would equip lawyers to deal with water scarcity, water pollution, and access to water problems that are crucial for attaining clean water goals.

SDG 7 (Clean and Affordable Energy) is linked with environmental legal education by renewable energy law, energy efficiency lawmaking, and energy transition policy formulation. Environmental law-trained lawyers can assist with cleaner energy transitions and overcome regulatory impediments to renewable energy development.

SDG 11 (Sustainable Cities and Communities) needs lawyers with knowledge of urban environmental law, land use planning law, and regulation of sustainable development. Lawyers trained in environmental law can help with cleaner energy transitions and can help with regulatory barriers to developing renewable energy. SDG 11 (Sustainable Cities and Communities) need lawyers with urban environmental law, land use planning law, and Regulation of Sustainable Development. Environmental legal education would enable lawyers to aid in sustainable urban development and aid in addressing urban environmental problems.

Biodiversity law, conservation law, and natural resource management law will contribute to environmental legal education as it relates to the direct dependency of SDG 14 (Life Below Water) and SDG 15 (Life on Land). It is important to have lawyers trained in environmental law to support biodiversity conservation efforts and protect natural resource management programs.

Additionally, democratizing environmental knowledge through law schools will empower marginalized communities to take part in environmental public participation, which is an important feature of environmental justice and democracy³³.

The democratic aspect focuses on how environmental legal education has public citizen purposes and not just professional training. Law school's serve as knowledge production and dissemination centers that influence public understanding of legal rights and governance systems. Environmental legal education reform would enhance public environmental legal literacy and strengthen democratic environmental governance.

³³ Aarhus Convention, *supra* note 20.

Environmental public participation demands citizens who are aware of environmental law rights, procedures, and remedies. If law schools create graduates with environmental legal education, the graduates become communities' legal advisors, advocates, and educators who increase community capacity for environmental participation. This multiplier effect extends environmental legal education benefits to more graduates and beyond individual graduates to wider community empowerment.

The environmental justice aspect sees environmental legal education reform contributing to social justice goals by focusing on how environmental harms disproportionately impact marginalized groups.

Legal education towards environmental law must train lawyers to recognize environmental justice issues, advocate for impacted communities, and develop policy solutions to problems of environmental injustice.

Global environmental governance requires lawyers knowledgeable of multilateral environmental agreements, international environmental law, and transboundary environmental cooperation mechanisms increasingly often.

Environmental legal education reform would equip Indian lawyers to engage actively in international environmental governance and support global environmental protection initiatives.

X. CONCLUSION: EDUCATING THE GREEN ADVOCATE

In a time characterized by ecological crisis, justice must be green. Law schools, as places of constitutional imagination, have a moral and professional duty to graduate lawyers who are equipped to address complex environmental issues. This essay contends that until environmental law finds a central position in India's legal pedagogy, the machinery of legal governance will continue to disregard ecological justice.

The shift of legal education towards making environmental law central is more than curricular change: it marks a profound reconceptualization of the role that law plays in combating contemporary problems. Legal pedagogy has responded to social changes in the past by adding new subjects and approaches. The ecological crisis calls for analogous pedagogic transformation in which Environmental law is seen as the basis for modern legal practice, not specialized expertise in the hands of a select few practitioners.

India's constitutional foundations of environmental protection impose a duty on legal education institutions to train lawyers to implement constitutional environmental mandates. The gap between constitutional environmental jurisprudence and legal pedagogical practices weakens constitutional implementation and restricts constitutional environmental vision realization. Legal education reform is imperative for constitutional environmental rights fulfillment.

International environmental legal education comparative analysis illustrates that India falls behind international standards in environmental legal education provision. This deficit in educational provision restricts India's ability to become an active player in international environmental governance and a contributor towards global environmental law development. Environmental legal education reform would increase India's international environmental law capability and leadership potential.

Practice gap analysis shows how poor environmental legal education directly weakens environmental governance performance. Inadequate environmental legal representation, low availability of environmental law clinics, and poor environmental law advocacy capacity are direct consequences of educational shortfalls that full reform would eliminate. Environmental governance quality is largely influenced by the quality of environmental legal education.

The reform roadmap presents direct recommendations for changing environmental legal education through compulsory courses, interdisciplinary linkage, clinical programs, and institutional coordination. These suggestions draw on international good practices and modified to suit Indian institutional conditions and resource limitation. Implementation of these suggestions would place India among international leaders in environmental legal education.

The alignment of the Sustainable Development Goals indicates how environmental legal education reform helps advance overall development goals and international commitments to global sustainability. Environmental legal education reform is a sustainable development investment produces advantages in several sectors and development issues. The SDG structure offers further rational and available financing options for environmental legal education reform.

Climate change urgency and environmental degradation call for expedited environmental Legal education reform that cannot wait for slow institutional development. Climate action deadlines and environmental protection imperatives call for urgent focus on environmental

legal education reform. Reform delay undermines environmental protection effectiveness and climate action potential. Genuine sustainability requires not only clean water and air, but also literate citizens and professionals with the ability to enforce environmental rights. The moment to incorporate environmental law doctrinally and institutionally at the core of Indian legal education is now.

The vision for environmental legal education reform goes beyond professional education to democratic capacity building and social change. Environmental legal education reform would enhance environmental citizenship development, democratic environmental governance strengthening and advancing environmental justice. These wider goals strongly suggest that environmental legal education reform is necessary for the future of sustainable development in India.

Acknowledging the obstacles associated with implementation is a critical step in preparing for actual change. First, faculty development programs need to be well-funded multi-year development and have institutional commitment that could not be accomplished with a one-off intervention. Second, transforming generalist professors into specialists in environmental law requires extensive training, mentorship by experienced practitioners, and time for course development. Institutions also face challenges differently. For instance, while National Law Universities have built-in over time to support reform, state universities and smaller private institutions face acute limitations on staff and financial resources.

Academically enforced universal reform without modelling differentiated support mechanisms risk imposing burdens on compliance institutions that need more support to accommodate universal reform. Funded central government support programs, staff and faculty technical assistance programs, and staged timelines need to be designed to ensure institutional variation to meet reform opportunities.

Resistance from entrenched institutional interests poses another significant challenge. Senior faculty members that have multiple years invested in their traditional curriculum may see an emphasis on environmental law as threatening the status quo regarding resource allocation. Similarly, administrative bureaucratic institutional priorities that emphasize commercially valuable curriculum that also enhances placement and placements statistics may oppose law school reform towards a greater emphasis on public interest law.

Breaking down resistance will require building coalitions of reform that bring together progressive faculty and students who have organized their constituency, social and environmental practitioners, members of the judiciary, and civil society. Pairing with international institutions may yield valuable technical assistance, exchange programs, and funding opportunities for service. All these challenges represent legitimate concerns but are secondary to the imperative of ecological crisis and constitutional commitments to immediate educational reform.

Sustaining comprehensive environmental legal education reform will require continuous engagement from legal education institutions, regulatory agencies, government ministries, and civil society organizations. Engaging these stakeholders in a joint system would transform legal education and advocate for environmental protection and climate action objectives that can benefit future or current generations of citizens in India and abroad.