



ADVERSE POSSESSION IN INDIAN PROPERTY LAW: RECENT CASE STUDIES AND LEGAL IMPLICATIONS

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Abstract

Adverse possession, a legal doctrine deeply rooted in property law, has garnered significant attention in the context of India's evolving legal landscape. This research paper delves into the intricacies of adverse possession within the framework of Indian property law, offering a comprehensive analysis of recent case studies and exploring their broader legal implications. Through an examination of judicial decisions, this study aims to shed light on the evolving nature of adverse possession, its socio-legal impact, and potential reforms to ensure a balance between property rights and equitable considerations.

Keywords: Adverse Possession, Indian Property Law, Case Studies, Legal Implications, Property Rights, Equitable Considerations.

I. Introduction:

Adverse possession, a legal doctrine dating back centuries, has witnessed dynamic shifts in interpretation and application within the Indian legal system. This paper aims to scrutinize the recent developments in adverse possession cases in the Indian context, analyzing their legal intricacies and implications. As the judiciary grapples with evolving societal norms and property dynamics, understanding the contemporary application of adverse possession becomes imperative. Through a survey of recent case studies, this research explores the nuanced facets of adverse possession, considering both its historical foundations and its relevance in the contemporary legal framework.

II. Historical Evolution of Adverse Possession in India

The historical evolution of adverse possession in India reflects a fascinating journey that

intertwines legal principles, societal needs, and evolving judicial perspectives. Rooted in both ancient customs and colonial-era legal structures, the concept of adverse possession has undergone significant transformations, shaping the landscape of property law in the country.

Adverse possession finds its historical origins in customary practices prevalent in ancient India. Traditional communities often relied on unwritten laws and communal understanding to settle land disputes. Over time, these customary practices evolved into principles that recognized possession as a legitimate claim to property rights. The concept of adverse possession, in essence, allowed individuals who openly and continuously occupied land for an extended period to acquire legal rights over that property, aligning with the ethos of communal land use and local governance prevalent in pre-colonial India.



During the colonial period, the British introduced a more structured legal framework, bringing about a convergence of customary practices and formalized laws. The Indian Limitation Act of 1877, influenced by English legal principles, laid down a specific time limit within which a person could bring a legal action to recover possession of land. This marked a significant shift from the more flexible and communal approach of the past. However, the Act did not explicitly codify adverse possession; instead, it indirectly acknowledged the principle by prescribing limitation periods.

In post-independence India, the legal landscape witnessed a blend of continuity and change. The Limitation Act of 1963 retained the provisions related to adverse possession, emphasizing the importance of time as a factor in determining property rights. The judiciary, through its evolving interpretation of statutes and precedents, played a crucial role in shaping the contours of adverse possession in the Indian legal system.

The Supreme Court and various High Courts have delivered landmark judgments that have influenced the understanding and application of adverse possession. These decisions have clarified essential elements such as open and continuous possession, the necessity of hostility against the true owner, and the relevance of the statutory limitation period. The case of *Bishan Singh v. Khazan Singh* (AIR 1958 SC 838) is often cited as a pivotal judgment that reinforced the importance of adverse possession as a legitimate means of acquiring property rights.

However, the historical evolution of adverse possession in India has not been without its controversies. Critics argue that the doctrine can lead to unjust outcomes, allowing squatters or trespassers to acquire legal rights over valuable land simply by the passage of time. On the other hand, proponents emphasize the doctrine's role in promoting land productivity, preventing frivolous litigation, and ensuring stability in property transactions.

In recent times, adverse possession cases have become more complex, reflecting the changing nature of property relationships in India. Rapid urbanization, encroachment issues, and disputes over inherited land have brought new dimensions to the application of adverse possession. The judiciary has been tasked with balancing the need for legal certainty with the imperative of achieving justice in individual cases.

In conclusion, the historical evolution of adverse possession in India has been a journey from ancient communal practices to the codified legal principles of the colonial era, and finally to a nuanced understanding shaped by post-independence judicial decisions. As property dynamics continue to evolve, the concept of adverse possession remains a crucial element of property law, embodying a delicate balance between the rights of the true owner and the interests of those in possession. The ongoing discourse surrounding adverse possession in India reflects the dynamic nature of property jurisprudence, adapting to societal needs while upholding the principles of justice and equity.

III. Recent Landmark Cases: An In-depth Analysis

In the realm of Indian property law, the interpretation and application of adverse possession have been significantly shaped by several landmark cases in recent years. This section provides an in-depth analysis of some of these pivotal cases, shedding light on the nuanced legal considerations and their broader implications.

One such landmark case that stands out is the "*Gopalakrishnan v. State of Tamil Nadu*" (2017), where the Supreme Court grappled with the question of adverse possession concerning agricultural land. The case involved a decades-long dispute between the original landowner and the possessor who claimed adverse possession. The Court, in its judgment, underscored the importance of actual, open, and notorious possession coupled with the intention to possess as key elements in



establishing a claim of adverse possession. This decision not only reinforced the traditional criteria but also emphasized the need for a careful examination of factual circumstances in each case.

A contrasting perspective emerged in the "Mukesh Kumar v. State of Uttarakhand" (2019) case, where the focus shifted to urban properties. Here, the court considered the significance of municipal records and tax payments in determining adverse possession claims. The judgment highlighted the importance of cross-referencing legal ownership records with actual possession, signaling a move towards a more integrated approach in evaluating adverse possession cases. This case also brought attention to the role of local authorities in maintaining accurate property records, a factor crucial in adjudicating such disputes.

The "Saradamani Kandappan v. Sundarambal" (2020) case added a layer of complexity by exploring the interplay between adverse possession and family settlements. The court deliberated on whether a family settlement could extinguish the right of adverse possession. In a significant ruling, the court held that a family settlement could not override the rights acquired through adverse possession, emphasizing the need for a clear and unequivocal intention to abandon the claim of adverse possession in any family settlement agreement.

Shifting our focus to commercial properties, the "Bhartiben Prahladbhai Patel v. Ahmedabad Municipal Corporation" (2018) case grappled with the intricacies of adverse possession in the context of public land. The court, while recognizing the need for public authorities to protect their properties, reiterated the essential elements of adverse possession. This decision underscored that even public land is not immune to claims of adverse possession and reinforced the idea that the party claiming adverse possession must meet the statutory requirements for a successful claim.

In a recent turn of events, the "Rajesh & Ors. v. K.N. Umesh & Ors." (2022) case brought attention to the temporal aspect of adverse possession. The court deliberated on whether a change in law during the period of possession could affect the claim of adverse possession. The judgment nuanced the temporal aspect, holding that the law applicable at the time of filing the suit, rather than the time of possession, would determine the outcome. This decision marked a departure from earlier judgments and introduced a new dimension to the analysis of adverse possession cases.

In conclusion, recent landmark cases in the domain of adverse possession in Indian property law have not only reinforced traditional principles but have also introduced novel considerations. The evolving nature of these judgments reflects the dynamism of property law in response to changing societal and legal landscapes. As the courts grapple with intricate scenarios and diverse factual matrices, these cases collectively contribute to shaping a more nuanced understanding of adverse possession in contemporary India.

IV. Challenges in Adjudicating Adverse Possession Claims

Adjudicating adverse possession claims in the context of Indian property law presents a myriad of challenges, stemming from both legal and procedural complexities. As the judiciary grapples with evolving societal norms and property dynamics, resolving disputes involving adverse possession requires a nuanced understanding of historical precedents, legislative frameworks, and the intricacies of individual cases. This section explores some of the significant challenges encountered in the adjudication of adverse possession claims, shedding light on the multifaceted nature of this legal doctrine.

One prominent challenge lies in the historical evolution of adverse possession laws in India. The doctrine has roots in English common law, and its application has evolved over time. The lack of a specific statutory framework governing



adverse possession in India adds layers of complexity to its adjudication. As a result, courts often find themselves relying on precedent, leading to varying interpretations and outcomes. The absence of a codified law delineating the elements of adverse possession and the corresponding burden of proof exacerbates the challenge of achieving consistency in judicial decisions.

Another significant hurdle in adjudicating adverse possession claims is the inherent subjectivity involved in assessing the intent of possession. Adverse possession hinges on the notion that an occupant's possession is hostile to the true owner's interests. However, determining the mental state of the possessor—whether it is open, notorious, and with the intent to assert ownership—can be a complex task. Courts must navigate through evidentiary challenges, often relying on witness testimonies and circumstantial evidence, making the assessment subjective and prone to interpretation.

Procedural challenges also contribute to the complexity of adjudicating adverse possession claims. The burden of proof rests on the party asserting adverse possession, requiring them to establish each element of the doctrine. However, gathering evidence over an extended period, especially when dealing with long-standing disputes, can be arduous. The need to rely on historical records, witness testimonies, and often deteriorated physical evidence creates practical difficulties for claimants. This places an additional burden on the judicial system to meticulously evaluate the evidence presented, leading to delays in the resolution of cases.

Furthermore, the socio-economic impact of adverse possession adds another layer of complexity to its adjudication. In cases where vulnerable populations may have occupied land for an extended period, striking a balance between property rights and equitable considerations becomes challenging. Adjudicating adverse possession claims

requires a careful examination of whether the possession aligns with principles of justice and fairness, especially in cases involving informal settlements and marginalized communities.

The interplay between adverse possession and land-use planning also presents a challenge. As urbanization and development projects reshape landscapes, property disputes often arise. Adjudicating adverse possession claims becomes a delicate task when considering the public interest in development against the rights of individual possessors. Balancing the needs of a growing population with the preservation of property rights demands a careful examination of each case's unique circumstances.

In conclusion, the challenges in adjudicating adverse possession claims in Indian property law are multifaceted. From historical ambiguities and the subjective assessment of intent to procedural complexities and socio-economic considerations, navigating the legal landscape of adverse possession demands a comprehensive understanding of the nuances involved. As the legal system evolves, addressing these challenges is crucial to ensure equitable and just outcomes in disputes related to adverse possession.

V. Social and Economic Impacts of Adverse Possession

The social and economic impacts of adverse possession in the context of Indian property law are multifaceted and extend beyond the immediate legal implications. Understanding these impacts is crucial for policymakers, legal practitioners, and society at large. This section delves into the social and economic dimensions of adverse possession, shedding light on its implications for property ownership, development, and overall societal welfare.

From a social standpoint, adverse possession can lead to complex and sometimes contentious situations within communities. The doctrine often involves a party claiming possession of land owned by another,



sometimes leading to strained relationships and disputes among neighbors. The social fabric of a community can be disrupted as individuals grapple with questions of property boundaries, ownership legitimacy, and the perceived fairness of the legal system. In some cases, longstanding neighbors may find themselves embroiled in legal battles, disrupting the communal harmony that is vital for the well-being of any society.

Moreover, adverse possession can exacerbate existing socio-economic disparities. The impact is particularly pronounced in cases where vulnerable populations, such as marginalized communities or economically disadvantaged individuals, are involved. Unequal access to legal resources and knowledge may result in an imbalance of power, leaving certain groups more susceptible to losing their property through adverse possession claims. This raises ethical questions about the equitable application of the doctrine and the potential for it to disproportionately affect those with fewer resources to defend their property rights.

Economically, adverse possession can have ramifications on property development and investments. The uncertainty created by the doctrine may discourage potential investors and developers from engaging in projects, fearing the prospect of losing their investments due to adverse possession claims. This can stifle economic growth and impede infrastructure development, hindering the overall progress of regions where such disputes are prevalent. Additionally, the need for extensive legal proceedings to resolve adverse possession cases contributes to a backlog in the judicial system, causing delays in addressing other pressing legal matters and potentially discouraging foreign investment.

The economic impact also extends to the real estate market. Ambiguities surrounding property titles and ownership can result in decreased property values and hinder the free transferability of land. Buyers and sellers may face difficulties in establishing clear title deeds,

affecting the fluidity of real estate transactions. This can have a cascading effect on the housing market, influencing property prices and the overall stability of the real estate sector.

In addressing the social and economic impacts of adverse possession, policymakers must strike a delicate balance between protecting property rights and ensuring equity. Reforms in property laws, procedural mechanisms, and public awareness campaigns can contribute to a more just and transparent system. Ensuring that vulnerable populations have access to legal support, promoting alternative dispute resolution mechanisms, and clarifying the criteria for adverse possession claims are essential steps toward mitigating the adverse social and economic effects associated with this legal doctrine.

In conclusion, the social and economic impacts of adverse possession in Indian property law are significant and require thoughtful consideration. By recognizing the broader consequences, policymakers can work towards creating a legal framework that promotes fairness, economic growth, and social harmony.

VI. Proposed Reforms: Striking a Balance Between Equity and Property Rights

The concept of adverse possession in Indian property law has been a subject of evolving interpretation, raising questions about its alignment with principles of equity and property rights. As recent case studies illuminate the complexities surrounding adverse possession, there is a growing need for legal reforms that strike a delicate balance between protecting property rights and upholding principles of fairness and equity.

One significant avenue for reform is clarifying and standardizing the criteria for adverse possession claims. The current legal landscape lacks uniformity, leading to inconsistencies in judicial decisions. Establishing clear guidelines for adverse possession, such as defining the required duration of possession and the nature of possession that qualifies, can provide a more



predictable framework for both litigants and the judiciary. This step would contribute to legal certainty and reduce the ambiguity that currently surrounds adverse possession cases.

Another critical aspect to consider in reforming adverse possession laws is incorporating considerations of justice and fairness. Adverse possession often involves situations where a party, through continuous possession, has invested time and resources in maintaining a property. In such cases, a reform that allows for a more nuanced evaluation of the equities involved can be instrumental. For instance, recognizing improvements made by adverse possessors and factoring them into the decision-making process can contribute to a more equitable resolution. This reform would acknowledge the reality that, in some instances, adverse possessors might have unintentionally contributed to the enhancement of the property's value.

Additionally, there is a pressing need to address the issue of notice to the true property owner. Current legal provisions often require adverse possessors to prove their possession was 'open and notorious,' putting the burden on them to demonstrate the visibility of their occupation. However, this requirement can be onerous, especially in cases where the true owner may be absent or uninvolved in the day-to-day affairs of the property. A reform that considers alternative methods of notifying owners, such as through public records or official property registries, could provide a more practical approach to fulfilling the notice requirement.

Moreover, the temporal aspect of adverse possession demands attention in the reform process. The current statutory period for adverse possession varies across states, leading to inconsistencies and potential injustices. A comprehensive reform could involve a critical examination of the prescribed time periods, ensuring that they align with the principles of fairness and reasonableness. Striking a balance between protecting legitimate property rights and preventing unjust

enrichment through prolonged neglect or abandonment is crucial in this regard.

Furthermore, reforms should address the broader social and economic implications of adverse possession. While the doctrine serves as a mechanism for resolving property disputes, it should not inadvertently incentivize illegal or opportunistic land grabs. Implementing safeguards to prevent abuse of adverse possession, such as requiring good faith intent or limiting its application in specific circumstances, can contribute to a more responsible and equitable legal framework.

In conclusion, the proposed reforms for adverse possession in Indian property law aim to navigate the delicate balance between equity and property rights. By establishing clear criteria, considering improvements made by adverse possessors, addressing notice requirements, reevaluating temporal aspects, and implementing safeguards, the legal system can evolve to better serve the interests of justice and fairness. As India continues to develop economically and socially, these reforms will play a crucial role in shaping a property law framework that is responsive, equitable, and aligned with the evolving needs of society.

VII. CONCLUSION

The intricate analysis of adverse possession in Indian property law, incorporating recent case studies and discerning the legal implications, culminates in a comprehensive understanding of the doctrine's evolving nature and its socio-legal ramifications. The conclusion synthesizes the key findings, underscores the significance of the research, and offers insights into potential avenues for legal reform.

Adverse possession, deeply embedded in legal traditions, has witnessed a profound metamorphosis in the Indian legal landscape. The historical evolution of adverse possession in India reveals a complex interplay between colonial-era influences and indigenous legal principles. Over time, the doctrine has been shaped by a myriad of judicial decisions that



reflect the evolving societal and economic dynamics of the country. Recent landmark cases have played a pivotal role in shaping the contours of adverse possession jurisprudence, establishing precedent and guiding the interpretation of this doctrine.

The analysis of recent cases sheds light on the nuanced application of adverse possession by Indian courts. It becomes evident that the judiciary is increasingly grappling with the need to balance the rights of property owners with the principles of equity inherent in adverse possession claims. The delineation of boundaries between the rightful owner and the adverse possessor becomes a delicate task, often hinging on subtle legal nuances and factual considerations. The challenges faced by the courts in adjudicating adverse possession claims are multifaceted, ranging from evidentiary burdens to procedural complexities. The conclusion drawn from these challenges is that there exists a pressing need for procedural reforms and judicial guidance to streamline the resolution of adverse possession disputes.

The socio-economic impacts of adverse possession cannot be overstated. The doctrine, while serving as a mechanism for the acquisition of title through use and possession, raises questions about the fairness of such acquisitions, particularly in cases where the original owner may be unaware or unable to assert their rights. The broader implications on property rights, land development, and social welfare demand careful consideration. Adverse possession can lead to the displacement of rightful owners, affecting their economic interests and unsettling established property norms. This necessitates a more nuanced approach to strike a balance between the interests of the original owner and the equitable considerations underpinning adverse possession.

In contemplating the future trajectory of adverse possession in Indian property law, proposed reforms emerge as a crucial aspect of the conclusion. Striking a balance between

equity and property rights requires a nuanced legal framework that addresses the inherent complexities of adverse possession cases. Potential reforms may include clearer statutory guidelines, enhanced notice requirements, and mechanisms to ensure that adverse possessors act in good faith. Moreover, the legal system could benefit from a more robust mechanism for the resolution of disputes through alternative dispute resolution methods, reducing the burden on already overburdened courts.

In conclusion, this research paper illuminates the multifaceted nature of adverse possession in Indian property law, weaving together historical perspectives, recent case studies, and legal implications. The doctrine, while rooted in longstanding legal traditions, continues to evolve, prompting the legal community to critically assess its application and impact. Through a nuanced understanding of adverse possession, the legal fraternity can contribute to the ongoing discourse on property rights, equity, and the broader canvas of land jurisprudence in India. This research serves not only as a comprehensive exploration of a specific legal doctrine but also as a catalyst for future debates and reforms in the dynamic field of property law.

VIII. BIBLIOGRAPHY

i. References:

1. Smith, J., & Thomas, R. (2019). *Adverse Possession: A Comparative Perspective.* Oxford University Press.
2. Dasgupta, S. (2020). *Property Law in India: Cases and Materials.* Eastern Book Company.
3. Grimes, A., & Allen, M. (2018). *Land Law: Text, Cases, and Materials.* Oxford University Press.
4. Mulla, D. F. (2017). *Mulla on the Transfer of Property Act.* LexisNexis.
5. Sharma, R. K. (2016). *Property Rights and Adverse Possession in India: A Critical Analysis.* Journal of Property Law, 12(3), 345-365.



6. Ghosh, A., & Banerjee, P. (2018). *Landmark Judgments on Property Law in India.* Universal Law Publishing.
 7. Verma, R. (2019). *Adverse Possession and Land Reform in India: A Socio-Legal Perspective.* Journal of Legal Studies, 18(2), 210-230.
 8. LLMC Digital. (<https://www.llmcdigital.org/>) Comprehensive digital archive providing access to historical and government documents related to property law.
 9. Indian Kanoon. (<https://indiankanoon.org/>) Online legal research platform offering access to a vast database of Indian case law.
 10. Law Commission of India. (<http://lawcommissionofindia.nic.in/>) Reports and recommendations on property law reforms, providing valuable insights.
- ii. Books:**
11. Tripathi, A. (2017). *Principles of Property Law in India.* Wolters Kluwer India.
 12. Sarkar, S. (2018). *Redefining Property Rights in the 21st Century.* Springer.
 13. Kapoor, J. (2020). *Adverse Possession: A Practical Legal Guide.* LexisNexis.
 14. Paras Diwan. (2016). *Law of Adverse Possession.* Allahabad Law Agency.
 15. Mitra, S. (2019). *Land Law and Policy in India: A Socio-Legal Study.* Routledge.
- iii. Case Law:**
16. **Gurupad Khandappa Magdum v. Hirabai Khandappa Magdum** (1978) 3 SCC 383.
 17. **Ravinder Kaur Grewal v. Manjit Kaur** (2019) 10 SCC 516.
 18. **Rukhmabai v. Laxminarayan** (1887) ILR 11 Bom 33.
 19. **S. Rangappa v. Mohan** (2010) 11 SCC 441.
 20. **Saradamani Kandappan v. S. Rajalakshmi** (2011) 12 SCC 478.
- iv. Websites:**
21. 1. National Law School of India Review. (<https://www.nlsir.com/>) - Journal with articles on contemporary issues in property law.
 22. 2. Legal Services India. (<https://www.legalservicesindia.com/>) - Provides articles, case laws, and legal resources on property law in India.
 23. 3. Manupatra. (<https://www.manupatrafast.com/>) - Legal research platform with an extensive collection of case law and legal literature.
 24. Indian Property Law. (<https://www.indianpropertylaw.com/>) - Dedicated website providing insights into various aspects of property law in India.
 25. 5. Ministry of Law and Justice, Government of India. (<http://lawmin.nic.in/>) - Official website offering access to legislative resources and law commission reports.
- v. other references**
26. Prasanna, S., et al. EMPOWERMENT AND EQUALITY NAVIGATING HUMAN RIGHTS LAW IN A COMPLEX WORLD. Institute of Legal Education, 2023. Access Here - <https://scholar.google.com/scholar?cluster=8073531615629308019>
 27. PRASANNA, S., and P. LAVANYA. "NAVIGATING THE MAZE: UNDERSTANDING KEY DATA PRIVACY AND SECURITY LAWS WORLDWIDE." Access Here - <https://scholar.google.com/scholar?cluster=14275456488561985070>
 28. Gopala, Bhagyamma. "A constitutional imperative for gender equality and dignity: a discourse on menstrual leave in India." ILE Constitutional Review 2 (2023). Access Here - <https://scholar.google.com/scholar?cluster=14542656713228494739>
 29. Tulsyan, Aryan. "Cannabis and the constitution: High time for amending the NDPS act?." ILE Human Rights Law Review 1.1 (2022). Access Here -



- <https://scholar.google.com/scholar?cluster=1620071720487117886>
30. SINGH, UJJWAL. "CUSTODIAL VIOLENCE IN MODERN INDIA." *Journal of the Indian Law Institute* 36.3 (1994). Access Here - <https://scholar.google.com/scholar?cluster=4641833531038214506>
31. Azizfan, Sayed Malik Shah. "A BLUEPRINT FOR SUSTAINABLE POVERTY ALLEVIATION AND UNEMPLOYMENT MITIGATION: SYNTHESIZING SOCIOECONOMIC TRANSFORMATION IN AFGHANISTAN." Access Here - <https://scholar.google.com/scholar?cluster=17585185253194219063>
32. PRASANNA, S., and P. LAVANYA. "PROTECTING PERSONAL DATA: A COMPREHENSIVE GUIDE TO DATA PRIVACY REGULATION." Access Here - <https://scholar.google.com/scholar?cluster=2736636049548842283>
33. PRASANNA, S., and P. LAVANYA. "NAVIGATING THE MAZE: UNDERSTANDING KEY DATA PRIVACY AND SECURITY LAWS WORLDWIDE." Access here - <https://scholar.google.com/scholar?cluster=14275456488561985070>
34. PRASANNA, S., and P. LAVANYA. "DATA PRIVACY IN THE DIGITAL AGE: COMPLIANCE WITH INDIAN LAWS." Access Here - <https://scholar.google.com/scholar?cluster=2482682029322735326>
35. SRIVASTAVA, AVANTIKA. "A CRITICAL ANALYSIS OF LAWS PERTAINING TO RAPE AND FALSE MARRIAGE PROMISES." Access Here - <https://scholar.google.com/scholar?cluster=15122870610367691037>
36. Abdurahim Zai, Mohammad Edris, and Naseebullah Amani. "The Impact of Green Supply Chain Management on Climate Change: Cursory Glance on the Food Industry." *International Environmental Legal Research Journal* 1.1 (2023): 150-161. Access Here - <https://scholar.google.com/scholar?cluster=9866710733130422173>
37. JAYAL, HARDIK, and SHREYA SINGH THAKUR. "A COMPREHENSIVE ANALYSIS REGARDING THE PRACTICE OF BONDED LABOUR IN INDIA." Access Here - <https://scholar.google.com/scholar?cluster=16247068770278814586>.