

An Evaluation of the Legal Framework for Fireworks in India

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Abstract

The preamble to the Indian Constitution promulgates India as a sovereign, socialist, and secular nation. The country's diversity is attributed to its countless festivals, faiths, and beliefs. Moreover, burning firecrackers is a vital part of these festivities. Though firecrackers are meant to bring joy, they have ironically turned into the sorrow of the public, its health, and the environment. They have marred the beauty of the joy associated with those celebrations. In contemporary times, where ecological and health awareness have attained their most excellent attention, issues such as the legality of using firecrackers and their impact on people's lives are no longer untouched. India, being the largest democracy and a host to pluralistic ideologies, has witnessed political battles, legislative debates, and legal battles on the same bone of contention.

India is committed to the United Nations Sustainable Development Goals, the Climate and Clean Air Coalition, UNFCCC and its Paris Agreement, and the Kyoto Protocol. However, it is not a signatory to the Working Environment (Air Pollution, Noise and Vibration) Convention, 1977. On the national front, it has legislations like the Environment Protection Act, the Air (Prevention and Control of Pollution) Act, and the Noise Pollution Rules, and on the state level, the governments are committed to bringing directions and introducing laws concerning the usage of firecrackers. The rising global concerns of air and noise pollution have also raised the alarm in the country for the administration. India's most pressing environmental issue in contemporary times is its hazardous air. In fact, by 2024, India's national clean air strategy hoped to cut particulate matter emissions by up to 30%. This paper assesses the existing legal provisions, their effectiveness, and potential areas for improvement. The paper will also compare the law with the regulations of several other countries. The study explores the balance between cultural practices, public safety, and environmental protection and provides recommendations for enhancing the legal framework surrounding fireworks in India.

Keywords: firecrackers, fireworks, pollution, firecracker laws, firecracker ban, India, Environment Protection Act, etc.

Introduction

Fireworks are important for joyous occasions and have cultural and symbolic significance in various world regions. While their significance may vary across nations and regions, fireworks are frequently related to festivities and celebrations in many countries. In Indian traditions and celebrations, fireworks play a significant cultural role. For centuries, they have been crucial in numerous religious, social, and festive occasions,

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becoming an essential part of Indian culture. There are numerous factors supporting the significance of fireworks in Indian culture. In India, fireworks are closely linked to customs and cultural practices. Cultural processions and events gain from their vibrancy, excitement, and grandeur. Fireworks enhance the overall spectacle and foster a sense of awe and celebration at weddings, religious processions, and cultural processions. These vibrant explosions, brilliant patterns, and sparkling lights produce a visually captivating spectacle. Firecrackers and fireworks are constituted by three elements: light, color, and sound, and all these elements symbolize festivity and jubilation. Moreover, just like festivals, they have a long history of discovery, origin, usage, and evolution.

Although fireworks can be visually stunning and entertaining, they raise several environmental and safety issues. Here are some of the main fireworks-related problems: Personal Safety: Misusing fireworks can result in serious injuries. They have explosive components that can cause burns, eye injuries, and even more serious situations like amputation or death. Fire dangers: Using open flames and sparks during fireworks can cause flammable materials nearby to catch fire. Noise pollution: The loud noises produced by fireworks can be upsetting for those sensitive to noise, as well as for young children, the elderly, and pets. When fireworks explode, various chemicals and heavy metals are released into the atmosphere. These toxins can worsen air pollution, especially where there are lots of fireworks. When fireworks debris enters rivers, lakes, or oceans, the chemicals can contaminate the water, harming aquatic life and ecosystems. It even causes disturbance to wildlife. Animals, especially pets and wildlife, can be susceptible to the loud noises and bright lights produced by fireworks. Fireworks can also impede wildlife's standard migratory and feeding patterns and reproduction ability. Fireworks displays frequently leave behind a sizable amount of waste and debris. This includes printed fireworks, plastic shells, cardboard packaging, and other materials. If not handled and cleaned correctly, improper disposal of these remnants can result in litter and grave environmental pollution.

The term firecrackers and fireworks are usually synonymously used by the common folk. However, scientifically speaking, one is the subset of the other. Simply speaking, all firecrackers are fireworks but not vice-versa. Vietnamese law clearly defines the two terms separately. According to it, the term 'firework' refers to a device that contains pyrotechnic compositions and which, upon mechanical, chemical, thermal, or electrical impact, causes rapid and intense chemical reactions, becomes volatile, and produces sound, light, and color, either with or without any explosion.³ On the contrary, firecrackers are considered to be products manufactured manually or industrially which, upon mechanical, chemical, thermal, or electrical impact, emit explosion sound effects or whistling, explosion sound, and colorful effects.⁴ Nevertheless, the two terms hold the same meaning in people's lives irrespective of their scientific or legal differences.

Dazzling World of Fireworks

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³ 'To distinguish 'Fireworks' and 'firecrackers' to avoid being fined during Tet in Vietnam' (*Lawnet*) < [⁴ 'Decree 137/2020/ND-CP on management and use of firecrackers' \(*Lawnet*\) < <https://lawnet.vn/vb/Nghi-dinh-137-2020-ND-CP-quan-ly-su-dung-phao-6EB44.html>> accessed 26 June 2023](https://lawnet.vn/judgment/en/tin-tuc/to-distinguish-fireworks-and-firecrackers-to-avoid-being-fined-during-tet-in-vietnam-7619#:~:text=In%20particular%2C%20firecrackers%20are%20devices,%2C%20explosions%2C%20and%20color%20effects.> accessed 26 June 2023</p></div><div data-bbox=)

⁵ 'To distinguish 'Fireworks' and 'firecrackers' to avoid being fined during Tet in Vietnam' (*Lawnet*) < [⁶ 'Decree 137/2020/ND-CP on management and use of firecrackers' \(*Lawnet*\) < <https://lawnet.vn/vb/Nghi-dinh-137-2020-ND-CP-quan-ly-su-dung-phao-6EB44.html>> accessed 26 June 2023](https://lawnet.vn/judgment/en/tin-tuc/to-distinguish-fireworks-and-firecrackers-to-avoid-being-fined-during-tet-in-vietnam-7619#:~:text=In%20particular%2C%20firecrackers%20are%20devices,%2C%20explosions%2C%20and%20color%20effects.> accessed 26 June 2023</p></div><div data-bbox=)

all these elements symbolize festivity and jubilation. Moreover, just like festivals, they have a long history of discovery, origin, usage, and evolution.

2.1. Firecrackers' History

Gunpowder is considered the predecessor of fireworks and firecrackers (hereinafter used synonymously) and was the first explosive to have been invented by mankind. It finds its genesis in 9th century China. However, prior to even gunpowder, there existed a different kind of explosive, which led to the nomenclature of the word 'bàozhú' (爆竹), which upon translation from Mandarin to English means 'firecracker.' Here, 'bào' means 'to explode,' and 'zhú' means 'bamboo.'⁷ Thus, firecrackers can be translated into exploding bamboo, and just like this derivation, the first ancestor of firecrackers was the bamboo, which exploded upon continuous heating and dates back to 200 BCE.⁸ Later, when gunpowder was invented during the late Tang Dynasty, and people started using gunpowder firecrackers during the Song Dynasty, the name continued to exist as the new device physically resembled bamboo.⁹

The usage and composition of firecrackers went through a significant evolution in China. During the earliest days, they were used to scare away ghosts and spirits and soon began to be used for festivals like Chinese New Year. Firecrackers held a different meaning for the Imperial House. It symbolized grandeur and strength and was used in warfare. When colored firecrackers were invented, they began to be used to produce military signal smoke.¹⁰ Later, Chinese pyrotechnics gradually gained global recognition and spread to other parts of the world.

2.2. Firecrackers Usage in India

Firecrackers began to be used in India around 1400CE as gunpowder entered the Indian warfare system.¹¹ It initially became the symbol of celebrations by the royal families. Gradually, it began to be used in communal festivals like Diwali and Eid until it reached household consumption, wherein fireworks were used to celebrate weddings and similar celebrations. The first ever fireworks factory in India was set up in the 19th century in Calcutta by Gopal Mahindram.¹² This indicates that before the 19th century, firecrackers were not known to be used excessively as a household commodity. However, in the coming decades, their consumption increased to such an extent that it started posing a threat to the health of Indians and turned into a political and legal concern.

In India, especially the Delhi-NCR belt, the Suspended Particulate Matter levels rise significantly around Diwali, and firecrackers are blamed for it, though burning of field waste at the end of the Kharif season, wind pattern, emissions from industries, dust due to construction and exhaust waste from vehicles also have many contributions to it. Thus, debates begin annually around Diwali. It isn't easy to comprehend the reason behind such occurrences unless a person is well acquainted with India and its culture and socio-political and legal footing.

In order to understand the Indian issue of firecrackers, a note must be taken of India's cultural and political diversity. India is a diverse nation with citizens of different religions, castes, classes, and ethnic groups. The preferences and ideologies of every such individual add to the nation's diversity. Further, over 2500 political parties exist, innumerable non-governmental organizations, and an uncountable number of active pressure groups consistently speak out on every social, political, and environmental issue, increasing this diversity. Using firecrackers at festivals has often stirred up the country's politics. Though it is an environmental issue, it has become legal and political. As it combines with the cultural and religious beliefs of the populace, it has now become the source of controversy for numerous ideologies.

With debates and discussions on rising pollution levels going around the world, what catches the attention of every Indian in the festive season of Diwali is the excessive use of firecrackers for celebration and the pollution caused by burning them. The main concern of this debate is to identify whether the use of these crackers on a single night of Diwali causes an 'ecological imbalance of the earth or not,' and if it does, then why is it the

⁷ Needham Joseph, 'Military Technology: The Gunpowder Epic' (2005) 5 (7) <0-521-30358-3> accessed 26 June 2023

⁸ David Curtis Wright. 'Medieval Science, Technology, and Medicine: An Encyclopedia'. (2005) <978-0-415-96930-7>. accessed 26 June 2023

⁹ Hugh Baker 'Ancestral Images: A Hong Kong Collection' (2011) <ISBN 978-988-8083-09-1.> accessed 26 June 2023

¹⁰ Needham Joseph, 'Military Technology: The Gunpowder Epic' (2005) 5 (7) <0-521-30358-3> accessed 26 June 2023

¹¹ Nandini Rathi, 'A Brief and Crackling History of Fireworks in India' *The Indian Express* (New Delhi, 15 October 2017) <"A brief and crackling history of fireworks in India."> accessed 26 June 2023.

¹² *ibid.*

matter of discussion only on Diwali and not on New Year or any other celebration for that matter, when more firecrackers are burnt that too late at night? Such discussions have become too familiar in the Indian legal and political circle. One can take a peek at the seriousness of this issue in the Indian context, where the domain of secularism and environmental activism have taken such a socio-political turn that the ban on firecrackers has been viewed as a project to civilize Hindus.¹³ One can go through the article written by former Rajya Sabha MP Tarun Vijay regarding the same to get the exact idea of how much this issue has become momentous.¹⁴

Now, let us understand the issue of firecrackers in a small quantity of detail, look at how the world views this issue, and then return to India to suggest a solution to this burning problem.

Fireworks: Legal Lens in India

In India, the legal framework for the prohibition of firecrackers mainly consists of laws at the National and state levels. Each State has the right to create and carry out its laws governing firecrackers, so the particular regulations and prohibitions may differ from one State to the next. Some states have enforced full or partial bans on firecrackers during particular holidays or events. These prohibitions range in extent and severity and can be temporary or permanent.

In the Indian context, though firecrackers have been associated more with environmental pollution in recent years, the risk of its use has been a cause for concern for a long time. The Sivakasi factory explosion was one of the most horrendous ones, where an explosion in a fireworks manufacturing factory killed more than 40 people and injured almost 60 of them.¹⁵ It was not the only one. Sivakasi, a predominantly cracker manufacturing town, boasts many firecracker explosion incidents. Unfortunately, despite the prohibition on engaging in child labor under Indian law, a considerable proportion of workers engaged there are child laborers.¹⁶ There have been numerous reports about deaths caused because of firecrackers, like that of 5 people in a fireworks shop at Sankarapuram,¹⁷ 3 in Solapur factory fire,¹⁸ 9 in a Kanchipuram Unit,¹⁹ another 3 in a Maheshtala factory,²⁰ amongst others. Considering all such issues, the government has constantly taken measures to improve the situation. Most recently, the focus has been on the environmental impact of using firecrackers, especially on festivals of Diwali, Dussehra, New Year, etc., and fireworks displays in Kerala during temple festivals and other festivals, including Pooram.²¹ Since the matter of firecrackers has emerged as a considerable contention, the three organs of the Indian Government—the Legislature, the Executive, and the Judiciary have made multiple attempts to solve it.

2.3. The Legislative Lens

The Constitution of India and other central legislations deal with diverse matters relating to this issue. An appropriate interpretation of such provisions and attempting to harmonize various constitutional tenets can solve the underlying concern.

¹³ Tarun Vijay, 'Cracker ban a project to civilize Hindus' *Economic Times* (New Delhi, 17 October 2017) <<https://economictimes.indiatimes.com/news/politics-and-nation/view-cracker-ban-a-project-to-civilise-hindus/articleshow/61109495.cms>> accessed 26 June 2023

¹⁴ *ibid.*

¹⁵ 'Fireworks factory blaze in India kills at least 40 people' *The Guardian* (New Delhi, 5 September 2012) <<https://www.theguardian.com/world/2012/sep/06/india-fireworks-factory-fire>> accessed 26 June 2023

¹⁶ Suresh Dharur 'Over to Sivakasi, where kids play with fire' *The Tribune* (Hyderabad, 30 October 2016) <<https://www.tribuneindia.com/news/archive/features/over-to-sivakasi-where-kids-play-with-fire-316540>> accessed 29 June 2023

¹⁷ 'Five Charred to Death in Fireworks Shop Accident at Sankarapuram in Tamil Nadu' *Times of India* (Kallakurichi, 26 October 2021) <<https://timesofindia.indiatimes.com/city/chennai/tamil-nadu-5-killed-in-fire-at-firecracker-shop-in-sankarapuram/articleshow/87286505.cms>> accessed 29 June 2023

¹⁸ '3 Dead, 4 Injured in Solapur Fireworks Factory Fire' *Indian Express* (Pune, 2 January 2023) <<https://indianexpress.com/article/cities/pune/3-dead-solapur-fireworks-factory-fire-8355386/>> accessed 29 June 2023

¹⁹ 'Nine Dead, Several Injured in Explosion at Firecracker Unit in Kanchipuram' *ABP Live* (22 March 2023) <<https://news.abplive.com/tamil-nadu/six-dead-several-injured-in-explosion-at-firecracker-unit-in-kanchipuram-1590173>> accessed 29 June 2023

²⁰ 'Three Killed in Fireworks Factory Blaze in Maheshtala' *Telegraph* (23 March 2023) <<https://www.telegraphindia.com/my-kolkata/news/three-killed-in-fireworks-factory-blaze-in-west-bengals-maheshtala/cid/1923983>> accessed 29 June 2023

²¹ 'Status of Pollution Abatement Measures' (Central Pollution Control Board) <<https://cpcb.nic.in/openpdffile.php?id=UmVwb3J0RmlsZXNNTYyXzE1MTE5MzQxNDRfbWVkaWFwG90bzMwMTQ0LnBKZg>> accessed 26 June 2023

The Constitution of India

The Preamble to the Constitution of India resolves to constitute India into a “socialist” state and aspires to provide “social justice.” Socialism includes environmentalism within itself as it aims to improve and protect society. In order to ensure socialism and the welfare of society, a law restricting the use of firecrackers is required to achieve the socialistic right of having a clean and healthy environment. Also, Article 21 guarantees to every person the fundamental right to life and personal liberty and, within itself, the right to a wholesome environment²², right to clean environment²³ and a pollution-free environment.²⁴ Additionally, under Article 48-A, the State must protect and improve the environment. Thus, it is the responsibility of the State to create a law in the interest of society and enact a law regulating the use of fireworks in the country to fulfill the obligation to provide a healthy environment.

The Explosives Act of 1884

It is the primary legislation in India that governs the production, storage, sale, transportation, and use of explosives, including firecrackers. It offers recommendations for licensing, safety requirements, and enforcement procedures. It is a colonial law that strictly defines the term 'explosive' and grants the Central Government the power to make rules regarding the licensing and the prohibition of manufacture, possession, use, sale, transport, import, and export of explosives. It also lists several offenses and stipulates penalties for them. Despite the existence of this law, its inadequacy is apparent on the face of the record. This can be attributed to the number of firecracker explosion accidents in factories and storehouses,

The Environment Protection Act, 1986

The Environment Protection Act is an umbrella legislation covering various environmental rules and regulations. It defines within itself various terms, including 'environment,' 'environmental pollutant,' 'environmental pollution,' and 'hazardous substances.' It is essentially a skeleton legislation that majorly delegates the powers of making rules and regulations in order to protect the environment (impliedly including protection of the environment from the harmful effects of fireworks) to the Central Government, which is responsible for coordinating with the State Governments and delegating its powers to the State Government. Therefore, it does not empower the state governments directly despite environmental pollution and its causes on a differing state-to-state basis, and it is dependent on regional factors. It empowers the Central Government to take measures to protect and improve the environment and gives it the power to draft and enact rules to regulate environmental pollution. In order to do this, the government enacted the Noise Pollution (Regulation and Control) Rules in 2000. These Rules define an area/zone and give the State Government the power to demarcate them. It categorizes the areas into four categories: Industrial, Commercial, Residential, and Silence Zone. Standards for permissible sound have been provided for day and night in each of these zones in decibels. According to these Rules, ‘night’ time begins at 10:00 p.m. and ends at 6:00 a.m. the next day. Now, it is a known fact that firecrackers not only emit huge smoke but also cause great noise, which can cause annoyance and affect the health of infants, senior citizens, people with sensitive ears, and heart patients, among others. According to Rule 5A (2), sound-emitting firecrackers are restricted from being burnt in both silence zones and at night. However, loud firecrackers are set to fire every year at 0:00 midnight sharp to celebrate the beginning of a new year! Such an act is subject to penalty under Rule 6, but the celebration continues “legally,” while a restriction to not burn firecrackers is strictly imposed for Diwali! Such a hypocritical application of law and its interpretation per one's convenience weakens the law. The law must be applied equally to all, not by one's whims and fancies.

Air (Prevention and Control of Pollution) Act, 1981

The Air Act was enacted before the Environment Protection Act. Thus, it does not fall within its ambit. This Act was enacted to control and prevent air pollution and prescribed the setting up of pollution control boards at the central and State levels. Unfortunately, this law applies primarily to the air pollution caused by the industries. Since firecrackers are meant for public consumption, and the air pollution caused by them results from the acts committed by the individuals and not a factory or industry, the present Act fails to address this issue. This brings us to a very huge concern. Are individuals entitled to destroy the environment and cause air (and water, since the Water Act is also made on similar lines) pollution as much as they desire? Is the law not warranting the general public indirectly exploiting the inadequacy of the law? It must be noted that every person has the right to pollution-free air and water under Article 21 of the Indian Constitution.²⁵ Moreover, in the historic Vehicular

²² *Rural Litigation and Entitlement Kendra & Others v. State of Uttar Pradesh*, 1985 SCR (3) 169.

²³ *Samir Mehta v. Union Of India*, MANU/GT/0104/2016.

²⁴ *Municipal Council, Ratlam v. Shri Vardhichand & Ors.*, 1980 AIR 1622.

²⁵ *Subhash Kumar v. State of Bihar & Ors.*, AIR 1991 SC 420.

Pollution Case²⁶, the Apex Court ruled out that the Indian Constitution recognizes the importance of protecting the environment, life, flora, and fauna by Article 51A and Directive Principles of State Policy. Therefore, the State must protect the environment, and all the persons burning firecrackers should have a fair idea of the harmful effects on the environment due to emissions caused by them. The State must take steps to enforce the law for the same. Thus, the State either needs to amend the existing laws or introduce a new law to recognize firecrackers and their public consumption as a source of air pollution.

The Commission for Air Quality Management in National Capital Region and Adjoining Areas Act, 2021

This is the only piece of regional legislation, though not a state legislation *per se*, which aims at managing the air quality in the States of Haryana, Punjab, Rajasthan, and Uttar Pradesh, adjoining the National Capital Territory of Delhi and the National Capital Region, where any source of pollution is located, causing adverse impact on air quality in the National Capital Region. This Act constitutes a Commission empowered with the power to restrict activities influencing air quality, which also implies the burning of firecrackers. It also provides a penalty of imprisonment for a term which may extend up to five years or with a fine which may extend up to one crore rupees or with both for non-compliance and contravention of this Act and the rules, orders, and directions made under it.

2.4. The Executive Lens

The central and state governments have made multiple attempts to analyze the pollution caused by firecrackers. The Central Pollution Control Board and the Union Ministry of Environment, Forest & Climate Change conducted a detailed study in 2017. They published its report in October of the same year.²⁷ The Report looked at the means for harmonization of the ISO and BIS standards of firecrackers, where the former are the international standards and the latter are the national standardization methods. It also suggested the do's and don'ts for burning the firecrackers.

Apart from this, one of the first incidents of restrictions on using firecrackers was in 2018, when the Central Government launched a plan to impose a nationwide ban on firecrackers.²⁸ The ban was ruled out as a response to the ongoing hearing in the Apex Court. Instead of using conventional firecrackers, the government suggested the usage of "green crackers" to celebrate festivals like Diwali.

Further, the Delhi Government imposed a blanket ban on all firecrackers, including the green crackers, from November 7 to November 30, 2020, considering Delhi's deteriorating air quality and increased COVID-19 cases.²⁹ Apart from Delhi, a blanket ban was imposed on Rajasthan, Odisha, and Sikkim firecrackers. At the same time, the Maharashtra government issued guidelines for burning the same, and the Haryana and Madhya Pradesh governments imposed a ban on the sale and distribution of "imported firecrackers" during Diwali.³⁰ West Bengal Government banned their use for Diwali Kali Puja and Chhath Puja, other significant festivals where firecrackers are burnt.³¹ In the same year, the Central Pollution Control Board directed the pollution watchdogs of Delhi, Haryana, Uttar Pradesh, and Rajasthan to ensure no firecrackers were burnt on Christmas and New Year.³² Due to increasing pollution, various state governments passed similar orders in 2021 and 2022.³³

²⁶ *M. C. Mehta v. Union of India & Ors.*, 1991 SCC (2) 353.

²⁷ 'Status of Pollution Abatement Measures' (*Central Pollution Control Board*) <<https://cpcb.nic.in/openpdf.php?id=UmVwb3J0RmlsZXNvNTYyXzE1MTE5MzQxNDRfbWVkaWFwaG90bzMwMTQ0LnBkZg>> accessed 26 June 2023

²⁸ 'Centre Rules Out Total Ban on Firecrackers' (*Drishti IAS*, 22 August 2018) <https://www.drishtiiias.com/daily-updates/daily-news-analysis/centre-rules-out-total-ban-on-firecrackers/print_manually> accessed 26 June 2023

²⁹ 'Delhi chokes, blanket ban on firecrackers from Nov 7 to 30' *Indian Express* (New Delhi, 6 November 2020) <<https://indianexpress.com/article/cities/delhi/delhi-firecracker-ban-air-quality-6967890/>> accessed 26 June 2023

³⁰ Karan Manral, 'From Rajasthan to Delhi, states which have banned firecrackers' *Hindustan Times* (New Delhi, 6 November 2020) <<https://www.hindustantimes.com/india-news/from-rajasthan-to-delhi-states-which-have-banned-firecrackers-this-diwali/story-oUbqM5v6daMxC3rFNJ4rJL.html>> accessed 26 June 2023

³¹ *ibid.*

³² 'Ensure No Firecrackers On Christmas, New Year In Delhi: Pollution Watchdog' *NDTV* (New Delhi, 20 October 2022) <<https://www.ndtv.com/india-news/ensure-no-firecrackers-on-christmas-new-year-in-delhi-top-pollution-watchdog-2342796>> accessed 26 June 2023

³³ 'Diwali 2021: State-wise guidelines on bursting of firecrackers' (*Mint*, 31 October 2021) <<https://www.livemint.com/news/india/diwali-2021-state-wise-guidelines-on-bursting-of-firecrackers-full-details-11635673296301.html>> accessed 26 June 2023

In 2023, some of the state governments and regional administrations took the following steps to control pollution:³⁴:

- The Punjab government permitted the sale and bursting of green crackers on Diwali, Guruparv, Christmas Eve, and New Year's Eve on specified timings for all the festivals but banned the chokes garland firecrackers and the online sale of firecrackers in the State;
- The Uttar Pradesh Government imposed restrictions only in the NCR cities, i.e., Noida and Ghaziabad; the Delhi Government imposed a blanket ban on all firecrackers until the New Year;
- The administration of Jammu and Kashmir also banned the use of firecrackers within 5 kilometers of the Line of Control and the International Border;
- The Hyderabad Police restricted the bursting of firecrackers only for two hours on Diwali;
- The Bombay High Court restricted the same for three hours;
- Like the Punjab Government, the West Bengal Government allowed green firecrackers sold and specified timings for bursting them on Diwali, Chhath Puja, Christmas, and New Year's Eve.

Further, in the same year, the Union Ministry of Environment, Forest and Climate Change published its strategies to control the rising pollution in the country.³⁵ It also mentions the steps the Central Government and Central Pollution Control Board took to improve air quality, including the National Clean Air Programme. However, this strategy did not mention measures the Government authorities took to curb the pollution caused by firecrackers and fireworks.

In 2024, the state governments were proactively imposing various restrictions on bursting firecrackers, for example.³⁶:

- Delhi again saw a blanket ban on firecrackers, leaving only a tiny window for green firecrackers for a limited time on the festivals of Diwali, Gurpurab, Christmas and New Year's Eve;
- Bihar saw a complete ban on firecrackers;
- In Maharashtra, permission to burn was only given for firecrackers, which produce 30% less pollution, whereas Mumbai Police even imposed a ban on sky lanterns;
- In Karnataka, the government attempted to encourage people to use green firecrackers;
- The Punjab Government decided to implement similar steps as it had taken in 2023;
- States of Kerala, Tamil Nadu, and West Bengal also saw similar government initiatives

However, despite all the administration's and State Governments' attempts, burning firecrackers across India headlined the national dailies.³⁷

Deepali Jena, 'Diwali 2022: List of states which have banned firecrackers and penalties for violating them' *India Today* (New Delhi, 20 October 2022) <<https://www.indiatoday.in/information/story/diwali-2022-list-of-states-which-have-banned-firecrackers-and-penalties-for-violating-them-2287596-2022-10-20>> accessed 26 June 2023

³⁴ *ibid.*

³⁵ 'Strategies To Control The Rising Pollution In The Country' (*Press Information Bureau*, 7 December 2023) <<https://pib.gov.in/PressReleasePage.aspx?PRID=1983680>> accessed 3 April 2025

³⁶ 'Firecracker ban in India: Delhi, Maharashtra, seven states prohibit Diwali; Mumbai says no to sky lanterns' (*Mint*, 31 October 2024) <<https://www.livemint.com/news/india/diwali-2024-firecracker-ban-in-9-states-including-delhi-and-maharashtra-mumbai-says-no-to-sky-lanterns-bengaluru-11730174017863.html>> accessed 25 January 2025

³⁷ Amit Dave, Shivam Patel 'Despite bans, firecrackers sizzle across India for Diwali' *Reuters* (1 November 2024) <<https://www.reuters.com/investigates/special-report/india-pollution-diwali-firecrackers/>> accessed 25 January 2024

2.5. The Judicial Lens

The Indian judiciary has actively taken on matters relating to firecrackers in response to worries about air pollution and public health. The sale, consumption, and timing of firecrackers are all subject to rules set down by the Supreme Court and the High Courts, notably during celebrations like Diwali. The environment versus festivity debate in the context of firecrackers has reached the judicial and quasi-judicial bodies of the country. The first notable case arose in 2015 when a Public Interest Litigation was filed by toddlers in the Apex Court seeking a complete ban on firecrackers.³⁸ However, this was not the first case to address this issue. In fact, in 2005, the Supreme Court directed the Department of Explosives to notify regulations regarding every firecracker's recommended and permitted composition.³⁹ Within three years, the Petroleum and Explosive Safety Organisation (PESO) drafted guidelines for four categories, wherein it was cleared that the sulfur content in firecrackers must not exceed 20%, nitrates must not exceed 57%, and aluminum powder content must not go beyond 23% in them.⁴⁰ These guidelines did not mention the acceptable concentration of heavy metals like cobalt, copper, and magnesium. Since no new guidelines have emerged since then, this remains a grey shade area and leaves enormous scope for improvement in the law.

In the 2015 Supreme Court case, the then Chief Justice H.L. Dattu refused to ban the bursting of firecrackers by people and held that it would infringe people's right to enjoy their religious festival, though the Court did restrict their use till 10:00 p.m. in the night.⁴¹ But in the year 2016, in the case of *Arjun Gopal v. Union of India*,⁴² The Apex Court took notice of a report by AIIMS Delhi, which depicted the rise in the number of patients with chest ailments, cough, and breathlessness due to exposure to toxic fumes generated by burning the firecrackers on Diwali night and a similar deterioration of the air quality. After noting it all, the Court banned the firecrackers from being used in Delhi and Delhi NCR. Also, it banned storing firecrackers in factories, retail outlets, or residential premises and the issuance of new licenses for businesses that manufacture and sell firecrackers.⁴³

Later, in 2017, the Apex Court in *Arjun Gopal v. Union of India*,⁴⁴ observed the role of stubble burning and industries as the contributory sources of pollution and, therefore, reversed the previously sanctioned blanket ban, allowed fireworks to be done at particular places, and directed the authorities to issue licenses to 50% of the businesses dealing in firecrackers.⁴⁵ Finally, in 2019, the Apex Court reached a definite conclusion wherein it directed PESO to inspect the composition of firecrackers and the raw material used in their preparation, Pollution Control Boards to monitor the air quality before and after a week of Diwali, banned the sale of firecrackers through e-commerce sites, fixed timings and locations for bursting firecrackers and allowed the burning of green crackers.⁴⁶

Later, in November 2020, the Calcutta High Court, in the case of *Gautam Roy v. State of West Bengal*, issued a state-wide ban on the sale and use of firecrackers and their manufacture.⁴⁷ This order was affirmed by the Supreme Court in a subsequent Special Leave Petition filed before it. But later, when the same case was heard in

³⁸ 'Response to 'Plea by Toddlers': Complete Ban on Firecrackers Not Needed' *Indian Express* (New Delhi, 28 October 2015) <<https://indianexpress.com/article/cities/delhi/response-to-plea-by-toddlers-complete-ban-on-firecrackers-not-needed-centre-to-sc/>> accessed 26 June 2023

³⁹ Krishna Polash Mukherjee '10 years on, Supreme Court Order on Firecracker Composition Gathers Dust' (*Down to earth*, 5 November 2015) <<https://www.downtoearth.org.in/news/air/10-years-on-supreme-court-order-on-firecracker-composition-gathers-dust-51709>> accessed 26 June 2023

⁴⁰ *ibid.*

⁴¹ Krishnadas Rajagopal, 'Cannot ban firecracker bursting on Diwali' *The Hindu* (New Delhi, 28 October 2015) <<https://www.thehindu.com/news/national/SC-says-%E2%80%98no%E2%80%99-to-firecracker-ban-on-Diwali/article60213392.ece>> accessed 26 June 2023

⁴² (2016) 1 SCC 412.

⁴³ Diva Rai 'An Analysis of Orders of the Indian Courts Regarding Sale and Use of Firecrackers' (*iPleaders*, 22 November 2021) <<https://blog.ipleaders.in/an-analysis-of-orders-of-the-indian-courts-regarding-sale-and-use-of-firecrackers/>> accessed 26 June 2023

⁴⁴ (2017) 16 SCC 280.

⁴⁵ Diva Rai 'An Analysis of Orders of the Indian Courts Regarding Sale and Use of Firecrackers' (*iPleaders*, 22 November 2021) <<https://blog.ipleaders.in/an-analysis-of-orders-of-the-indian-courts-regarding-sale-and-use-of-firecrackers/>> accessed 26 June 2023

⁴⁶ *ibid.*

⁴⁷ *ibid.*

2021, and the Calcutta High Court ordered a complete ban on firecrackers,⁴⁸ The Supreme Court set it aside and held that a complete ban could not be imposed and that only those firecrackers that are hazardous to health and the environment could be banned.⁴⁹

This matter arose again in December 2020, and this time, the National Green Tribunal initiated *suo moto* proceedings against the Ministry of Environment, Forest and Climate Change in order to analyze the issue of firecrackers burning and its impact on the environment and thus, issued directions of a complete ban on burning of firecrackers from November 9 to November 30, 2020, in the National Capital Region and all the other regions with poor air quality.⁵⁰ The Apex Court again heard a plea challenging the ban on firecrackers imposed by the Delhi Government in October 2022.⁵¹ However, the Court here refused to lift the ban and continued the ban till New Year.⁵² In 2023, the Supreme Court ordered the ban of firecrackers filled with barium and other banned chemical compounds on Diwali.⁵³ The Supreme Court and the National Green Tribunal ordered limiting firecrackers' use in 2024.⁵⁴

Thus, the judiciary has continuously monitored the air quality and took necessary action. However, the issue that remains is that the actions taken by it are not permanent, and every year, a new petition arises, and it requires fresh consideration. Thus, lawmakers need to make efforts to ease the system.

Global Practices and Laws regarding Fireworks in various nations

Global talks, international conventions, and protocols, as well as the Sustainable Development Goals of the United Nations, have all been frequently looking out for solutions to the growing concern of pollution, and fireworks, being themselves a source of pollution, have also drawn the attention of the global fraternity. The United Nations Sustainable Goals, Climate and Clean Air Coalition to Reduce Short-Lived Climate Pollutants, the United Nations Framework Convention on Climate Change, Working Environment (Air Pollution, Noise Pollution, and Vibration) Convention, etc. are some of the international efforts to curb pollution and thus, also apply to fireworks, a significant source of air and noise pollution.

Several countries have rigorous laws and rules addressing the usage and sale of fireworks, setting excellent examples for environmental and safety protection. Some nations, like Australia, Canada, Germany, Japan, and the United Kingdom, are renowned for their thorough regulations on fireworks. These nations are models for successfully regulating and enforcing fireworks legislation, prioritizing environmental and public safety. Their strategies include licensing frameworks, constrained sale and use windows, safety requirements, and regulatory agency oversight.

Japan

"Hanabi," or fireworks displays, have a long history in Japan. Due to strict regulations, only trained personnel with a license can handle fireworks. Public displays are a big draw during summer festivals, although private use is typically forbidden or restricted to certain licensed events. Safety regulations are meticulously followed,

⁴⁸ Shagun Suryam 'Covid-19] Calcutta High Court Orders Total Ban on Firecrackers for Upcoming Diwali, Kali Puja, Christmas, New Year' (Bar and Bench, 29 October 2021) <<https://www.barandbench.com/news/litigation/covid-19-calcutta-high-court-orders-total-ban-on-firecrackers-for-upcoming-diwali-kali-puja-christmas-new-year>> accessed 26 June 2023

⁴⁹ "There cannot be a total ban on firecrackers:" Supreme Court sets aside Calcutta High Court order imposing blanket ban' (Bar and Bench, 1 November 2021) <<https://www.barandbench.com/news/litigation/breaking-supreme-court-sets-aside-calcutta-high-court-order-imposing-total-ban-on-firecrackers>> accessed 26 June 2023

⁵⁰ (National Green Tribunal, 1 December 2020) <https://greentribunal.gov.in/gen_pdf_test.php?filepath=L25ndF9kb2N1bWVudHMvbmdd0L2Nhc2Vkb2MvanVkZ2VtZW50cy9ERUxISS8yMDIwLTAxLzE2MDY4OTU0NDA5MzU2MDQ2OTg1ZmM3NDc1MDE3ZWJhLnBkZg==> accessed 26 June 2023

⁵¹ Padmakshi Sharma 'Supreme Court to hear plea challenging firecrackers ban in Delhi on October 10' (LiveLaw, 23 September 2022) <<https://www.livelaw.in/top-stories/supreme-court-to-hear-plea-challenging-firecrackers-ban-in-delhi-on-october-10-210119?infiniteScroll=1>> accessed 26 June 2023

⁵² Manisha Pandey, 'Supreme Court Refuses to Lift Ban on Firecrackers' *India Today* (New Delhi, 10 October 2022) <<https://www.indiatoday.in/india/story/supreme-court-refuses-to-lift-ban-on-firecrackers-in-delhi-2283520-2022-10-10>> accessed 26 June 2023

⁵³ Amit Chaturvedi 'Diwali 2023: State Wise Rules for Bursting Firecrackers' *NDTV* (11 November 2023) <<https://www.ndtv.com/india-news/diwali-2023-state-wise-rules-for-bursting-firecrackers-4566150>> accessed 25 January 2025

⁵⁴ 'Firecracker ban in India: Delhi, Maharashtra, seven states prohibit Diwali; Mumbai says no to sky lanterns' (Mint, 31 October 2024) <<https://www.livemint.com/news/india/diwali-2024-firecracker-ban-in-9-states-including-delhi-and-maharashtra-mumbai-says-no-to-sky-lanterns-bengaluru-11730174017863.html>> accessed 25 January 2025

ensuring displays are well-managed and controlled. Though handheld firecrackers, like sparklers, are legal in the country. Japan's Explosive Control Law regulates the manufacturing, sale, stockpiling, transportation, and consumption of explosives to ensure safety among the citizens.⁵⁵

Singapore

The very first instance of a state restricting the sale, purchase, storage, and usage of firecrackers emerged in Singapore in 1970, when a partial ban was imposed on them due to the occurrence of a fire that killed six and injured as many as 68 people. Later, in 1972, the enactment of the Dangerous Fireworks Act imposed a complete ban.⁵⁶ Though these bans were not imposed due to the pollution that firecrackers cause, they certainly signify that their usage is unsafe. Regarding the present status, the Singapore Tourism Board can determine whether firecrackers can be set off on a particular occasion. However, they are not permitted to be sold. It is noteworthy that since 2003, firecrackers have been allowed to be set off during the festive season of 2003, especially on the Lunar New Year.

China

Fireworks and other firecrackers are widely used and produced in China. Fireworks are important in China, particularly during traditional holidays like the Chinese New Year and the Lantern Festival. However, China has also had to deal with issues such as pollution, accidents, and the proper use of firecrackers. In China, firecrackers have a long cultural history and are associated with luck and the warding off evil spirits. Chinese traditions and celebrations are firmly engrained in their use throughout festive occasions. Considering the cultural and historical significance of fireworks, controlling their use is a challenging undertaking. The Chinese government has addressed concerns about environmental damage and firework safety. This entails defining safety requirements for the manufacture of fireworks, governing their usage and sale, and taking strict measures against their illegitimate manufacture and sale. Fireworks were earlier banned in various urban centres of China, including Beijing, where they were banned for almost 12 years from 1993 to 2005.⁵⁷ These bans were lifted later, and now, China does not ban firecrackers. It must be noted that as of 2022, China is the 25th most polluted country in the world,⁵⁸ which, though, is a better position than India, but not very healthy either. The government has also promoted creating and using environmentally friendly fireworks that make less noise and smoke.

Thailand

During festivals like Loy Krathong and Songkran, Thailand is renowned for its raucous firecracker displays. However, the nation has suffered from fireworks-related safety issues and mishaps. There have been incidents involving injuries and fatalities during celebrations involving firecrackers, underscoring the necessity for stricter laws and improved safety precautions. In fact, in the city of Phuket, setting off not only firecrackers but also sky lanterns without the relevant authority's permission can land a person in prison for three long years and cost him/her a fine up to 60,000 Thai Baht, which upon conversion equals up to almost 1,38,377 Indian Rupees.⁵⁹

Finland

Finland is considered one of the cleanest countries in the world. Firecrackers with more than 0.95 grams of black powder are restricted from being sold to consumers. As far as the larger firecrackers are concerned, they have been banned because of the risk of accidents.⁶⁰ It must be noted that Finland ranks as the 119th most polluted country in the world.⁶¹ As far as the consumption of consumer fireworks in Finland is concerned, at

⁵⁵ Ministry of Foreign Affairs of Japan 'National Report on the Implementation of Programme of Action (PoA) to Prevent, Combat and Eradicate the Illicit Trade in Small Arms and Light Weapons in All Its Aspects' <[https://www.mofa.go.jp/policy/un/disarmament/weapon/report0306.html#:~:text=\(C\)%20Explosives%20Control%20Law&text=The%20Law%20\(promulgated%20on%20May,and%20to%20ensure%20public%20safety.](https://www.mofa.go.jp/policy/un/disarmament/weapon/report0306.html#:~:text=(C)%20Explosives%20Control%20Law&text=The%20Law%20(promulgated%20on%20May,and%20to%20ensure%20public%20safety.)> accessed 29 June 2023

⁵⁶ Vanessa Ng 'The Story Behind Why CNY Firecrackers Were Banned in Singapore' (*Kopi*, 26 January 2020) <<https://thekopi.co/2020/01/26/firecrackers-in-singapore/>> accessed 26 June 2023

⁵⁷ 'Beijing to loosen the 12-year ban on firecrackers' (*People Daily*, 4 March 2023) <peopledaily.com> accessed 26 June 2023

⁵⁸ 'World's Most Polluted Countries in 2022 – PM 2.5 Ranking' (*IQAir*) <<https://www.iqair.com/us/world-most-polluted-countries>> accessed 26 June 2023

⁵⁹ Neill Fronde 'Fireworks and sky lanterns still illegal in Phuket' (*Thaiger*, 27 December 2022) <<https://thethaiger.com/news/phuket/fireworks-and-sky-lanterns-still-illegal-in-phuket>> accessed 29 June 2023

⁶⁰ Yle Uutiset "'Entisajan ilotulitteen tekivät pahimmillaan karmea jälkeä" – nämä räjähteet eivät enää kuulu uudenvuoden juhlintaan" (31 December 2014) <<https://yle.fi/a/3-7705507>> accessed 26 June 2023

⁶¹ 'World's Most Polluted Countries in 2022 – PM 2.5 Ranking' (*IQAir*) <<https://www.iqair.com/us/world-most-polluted-countries>> accessed 26 June 2023

least 5 days prior notification about their usage has to be given to the municipal authorities except on New Year's Eve so that the authorities can ensure the safety of the citizens.⁶²

Apart from these countries, Germany (AQI Rank 2022: 88) has applied a very effective policy on firecrackers wherein they have been classified into three categories, and similarly, Croatia (Rank: 37) also categorizes firecrackers in three categories and handles them accordingly.⁶³ Every country, based on its socio-cultural setup, has placed laws for controlling the use of firecrackers to prevent safety hazards. Similarly, India must consider its socio-cultural setup and implement an amiable law. India currently does not classify firecrackers. Doing so can ease handling various firecrackers based on their composition and societal hazards. While no country applies a blanket ban on fireworks, many countries have permitted the bursting of firecrackers in communities and have banned their sale to the public for individual use.

Way Forward

In 2022, India was ranked as the 8th most polluted country in the world, with its metropolitan cities hosting the worst air quality.⁶⁴ As the centre of the heated debate between environment and culture, India must take a strong legal stance and choose a middle path to balance the two needs. From historic times via *Panchsheel*, Non-Aligned Movement, and Satyagraha, India has always chosen a middle path due to the diversity of thoughts in the country. In order to accommodate them all and improve the country's environmental condition, the country must implement a law that restricts the use of harmful firecrackers on all occasions while allowing the use of green crackers for a fixed period only on festivals and not for individual celebrations.

Delhi has become a flag bearer among Indian states in reducing firecracker bans and enforcing stronger controls. In order to address the adverse effects of firecrackers on air quality and public health, particularly during holidays like Diwali, the Delhi government has adopted pre-emptive measures. Given the high air pollution in the city, Delhi has enacted a blanket ban on the sale, manufacture, and usage of firecrackers. The restriction aims to lessen pollution and safeguard the public's health, particularly during festivals when the use of firecrackers is at its highest. The Delhi government has aggressively carried out public awareness initiatives to inform residents of the negative consequences of firecrackers on the environment and their health. These projects encourage people to sustainably and ethically celebrate festivals by promoting eco-friendly alternatives. Delhi has strongly emphasized enforcing the firecracker prohibition strictly by actions including heightened monitoring, unexpected inspections, and sanctions for offenders. The Delhi government has partnered with NGOs, environmental organizations, and residents to spread awareness of the adverse effects of firecrackers. These collaborations seek to involve the neighborhood and encourage a sense of shared accountability for lowering air pollution and safeguarding public health. Other Indian states can follow Delhi's lead in addressing the problems that firecrackers pose by adopting similar policies. In order to reduce the use of firecrackers and promote safer alternatives, they emphasize the value of pre-emptive action, public awareness campaigns, strict enforcement, and citizen cooperation.

Allowing the burning of less-harmful firecrackers like 'sparklers' and 'pop crackers' on a community level and permitting firework displays by legally authorized agencies along with banning their sale to the public are some ways in which the festivals, as well as the environment, can be preserved. It is high time that Indian law took cognizance of this matter and took a concrete step rather than going into annual debates and political arguments. Enacting and enforcing a stringent law that penalizes the offenders and maintains the dignity of faith can only help in bringing equilibrium between the socialist and secular pillars of the nation and make it a better place to live in. While many nations worldwide have policies regarding the regulation of fireworks, only a few have strict laws to regulate them. Unfortunately, India is one nation that does not expressly deal with the grievous issue of fireworks hazards. A healthy, safe, and clean environment is one of the many development indicators of a nation. By enacting a law for the same, India can advance towards becoming a developed country. In addition to addressing the related safety and environmental problems, it is critical to acknowledge the cultural value of fireworks in India. Creating a thorough legislative framework for fireworks control requires striking a

⁶² 'Fireworks' (*Suomi.fi*) <<https://www.suomi.fi/services/fireworks-the-social-services-health-care-and-rescue-services-division-city-of-helsinki/d77207ad-a27f-4b9b-b6aa-f46c79dc350c#:~:text=The%20use%20of%20fireworks%20without,5%20days%20before%20the%20event.>> accessed 29 June 2023

⁶³ Večernji 'Kazne za pirotehnička sredstva I do 80.000 kuna' <<https://www.vecernji.hr/vijesti/kazne-za-pirotehnicka-sredstva-i-do-80-000-kuna-1214129>> accessed 26 June 2023

⁶⁴ 'World's Most Polluted Countries in 2022 – PM 2.5 Ranking' (*IQAir*) <<https://www.iqair.com/us/world-most-polluted-countries>> accessed 26 June 2023

compromise between maintaining cultural traditions, guaranteeing public safety, and maintaining the environment.

In light of the issues in this article, we highly recommend that amendments be made to the Environmental Protection Act to empower the State Governments to make Rules and Regulations to curb the pollution caused by firecrackers and fireworks. We also recommend that the pollution caused by fireworks and firecrackers be expressly dealt with in the Air Act and the Noise Pollution Rules. We further recommend that new legislation be drafted and introduced in the Parliament that can restrict the use of firecrackers and fireworks, specify appropriate limits for their usage, provide inspection committees to check that no black marketing is possible, establish a Committee that certifies and regulates the manufacturing and sale of green crackers and penalizes the offenders who contravene any such provisions.

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