The Indian Constitution provides citizens with Fundamental Rights, but it also reminds them of their responsibilities towards the nation, society, the environment and fellow human beings.

These responsibilities are known as Fundamental Duties under Article 51A. They were introduced through the 42nd Constitutional Amendment in 1976, with an additional duty relating to children's education added in 2002.

The following landmark judgments explain how the Supreme Court has interpreted and reinforced these duties.

CATEGORY 1: DUTY TO PROTECT THE ENVIRONMENT AND NATURAL RESOURCES

Article 51A(g)

1. M.C. Mehta v. Union of India (1987) – Ganga Pollution Case

Background of the case

During the 1980s, the River Ganga was facing serious pollution. Several industries, particularly tanneries around Kanpur, were discharging untreated industrial waste into the river. This affected the water used by millions of people.

Environmental lawyer M.C. Mehta approached the Supreme Court seeking protection of the river.

What did the Supreme Court decide?

The Supreme Court directed polluting tanneries to establish primary treatment facilities for their industrial waste. It ordered the closure of tanneries that failed to comply.

The Court made it clear that industries could not continue polluting the river simply because installing treatment facilities was expensive.

Why is this judgment important?

It established that industrial development cannot come at the cost of public health and environmental protection.

Civic lesson: Protecting rivers is everyone's responsibility. Industries must treat their waste, municipalities must manage sewage, and citizens must avoid polluting water bodies.

2. M.C. Mehta v. Kamal Nath (1996)

Background of the case

A motel associated with Kamal Nath's family had undertaken construction and development activities near the River Beas in Himachal Pradesh. These activities interfered with the natural course of the river and affected the surrounding environment.

What did the Supreme Court decide?

The Supreme Court applied the Public Trust Doctrine, holding that natural resources such as rivers, forests and lakes are held by the government in trust for the public.

The Court ordered restoration of the affected area and imposed environmental compensation.

Why is this judgment important?

It established that the government cannot treat natural resources as private property or permit their exploitation without considering public interests.

Civic lesson: Rivers and forests are a shared inheritance. We have a responsibility to protect them for future generations.

3. Rural Litigation and Entitlement Kendra v. State of Uttar Pradesh (1985–86)

Background of the case

Limestone mining in the Mussoorie-Dehradun region was damaging the surrounding hills, forests and ecological balance.

An organisation called Rural Litigation and Entitlement Kendra approached the Supreme Court seeking intervention.

What did the Supreme Court decide?

The Court ordered the closure of several environmentally damaging limestone mines, recognising the importance of protecting ecological balance.

Why is this judgment important?

It demonstrated that economic development must be balanced with environmental conservation.

Civic lesson: Citizens have a responsibility to protect forests, prevent environmental destruction and support sustainable development.

CATEGORY 2: DUTY TO MAINTAIN CLEANLINESS AND PROTECT PUBLIC HEALTH

Constitutional connection: Article 51A(g)

4. Municipal Council, Ratlam v. Vardhichand (1980)

Background of the case

Residents of Ratlam, Madhya Pradesh, were suffering because of open drains, stagnant wastewater, foul smells and inadequate public toilets.

Despite repeated complaints, the municipality failed to take adequate action. Residents approached the courts seeking better sanitation.

What did the Supreme Court decide?

The Supreme Court upheld directions requiring the municipality to improve drainage, provide sanitation facilities and address public nuisance.

The municipality argued that it lacked sufficient funds. The Court made it clear that financial difficulties could not be used as an excuse to neglect essential public health responsibilities.

Why is this judgment important?

It established that sanitation is an essential public responsibility, not an optional municipal service.

Civic lesson: Cleanliness requires responsible citizens as well as accountable municipal authorities. We cannot demand clean streets while contributing to littering.

5. Almitra H. Patel v. Union of India (1998 onwards)

Background of the case

Environmental activist Almitra H. Patel raised concerns about the growing problem of municipal solid waste in Indian cities.

Garbage was being dumped in open spaces, waste was not properly segregated and urban local bodies lacked effective disposal systems.

What did the Supreme Court decide?

The Court directed the formation of an expert committee in 1998 to examine municipal solid waste management and recommend improvements.

The proceedings contributed to the development of a more organised approach towards urban waste management.

Why is this judgment important?

It highlighted that waste management involves much more than collecting garbage. It requires segregation, recycling, processing and safe disposal.

Civic lesson: Every household has a role in waste management. Separating wet and dry waste, avoiding littering and reducing unnecessary plastic use are practical ways of fulfilling civic responsibility.

CATEGORY 3: DUTY TO SHOW COMPASSION TOWARDS LIVING CREATURES

Article 51A(g)

6. Animal Welfare Board of India v. A. Nagaraja (2014)

Background of the case

Jallikattu is a traditional bull-taming event associated with Tamil Nadu, particularly during the Pongal festival.

Animal welfare organisations raised concerns about the treatment of bulls during these events, arguing that the animals were subjected to unnecessary pain and suffering.

The Animal Welfare Board of India approached the Supreme Court seeking protection for the animals.

What did the Supreme Court decide?

In May 2014, the Supreme Court ruled against Jallikattu and bullock-cart races in the form before it.

The Court relied on the Prevention of Cruelty to Animals Act, 1960, and referred to Article 51A(g), which establishes compassion towards living creatures as a Fundamental Duty.

Why is this judgment important?

It brought animal welfare into the wider discussion of constitutional responsibilities and recognised that animals should not be treated merely as objects of entertainment.

Civic lesson: Compassion must extend beyond human beings. Citizens have a responsibility to prevent cruelty towards animals and support their humane treatment.

Important update: In 2023, a Constitution Bench upheld relevant state amendments concerning Jallikattu and certain other traditional animal sporting events. The 2014 judgment should therefore not be presented as the current blanket prohibition of Jallikattu.

7. State of Gujarat v. Mirzapur Moti Kureshi Kassab Jamat (2005)

Background of the case

The Gujarat government introduced restrictions on the slaughter of certain categories of cattle.

Groups representing the butchers' community challenged these restrictions, arguing that they affected their occupation and livelihood.

What did the Supreme Court decide?

The Constitution Bench upheld the relevant restrictions on the slaughter of bulls and bullocks under the Gujarat law.

It examined Articles 48, 48A and 51A(g), concerning animal husbandry, environmental protection and compassion towards living creatures.

Why is this judgment important?

It demonstrated how animal preservation and compassion can form part of India's constitutional framework.

Civic lesson: The treatment of animals and protection of living creatures are important considerations in a responsible society.

CATEGORY 4: DUTY TO RESPECT THE CONSTITUTION AND NATIONAL SYMBOLS

Article 51A(a)

8. Bijoe Emmanuel v. State of Kerala (1986)

Background of the case

Three schoolchildren in Kerala belonged to the Jehovah's Witnesses religious community. Their religious beliefs prevented them from singing the National Anthem, although they stood respectfully whenever it was played.

The school authorities expelled them for not singing. Their parents challenged the decision.

What did the Supreme Court decide?

The Supreme Court ruled in favour of the children.

It held that there was no law requiring everyone to sing the National Anthem. Standing respectfully without singing did not constitute disrespect.

The Court protected their constitutional rights under Articles 19(1)(a) and 25.

Why is this judgment important?

It clarified that respect for national symbols must be understood alongside the fundamental freedoms guaranteed by the Constitution.

Civic lesson: Responsible citizenship involves respecting national symbols as well as respecting the constitutional freedoms of fellow citizens.

CATEGORY 5: DUTY TO PROTECT PUBLIC PROPERTY AND REJECT VIOLENCE

Article 51A(i)

9. In Re: Destruction of Public and Private Properties (2009)

Background of the case

During protests, demonstrations, strikes and bandhs in India, public and private properties were frequently damaged. Government buses, railway infrastructure and public buildings were among the properties affected.

The Supreme Court examined how such destruction could be prevented and how those responsible could be held accountable.

What did the Supreme Court decide?

In 2009, the Court accepted recommendations from committees headed by Justice K.T. Thomas and Fali S. Nariman.

It issued guidelines concerning the prevention of damage, police responsibilities, accountability and compensation.

Why is this judgment important?

Public property is built using public money. When it is damaged, ordinary citizens ultimately bear the financial burden.

Civic lesson: Every citizen has the right to participate in peaceful democratic protests, but public property must be protected.

CATEGORY 6: DUTY TO PROMOTE HARMONY AND RESPECT THE DIGNITY OF OTHERS

Article 51A(e)

10. Karma Dorjee v. Union of India (2016)

Background of the case

People from India's northeastern states have faced discrimination and racial prejudice in different parts of the country.

Concerns were raised about the safety, dignity and treatment of citizens from the Northeast.

The matter reached the Supreme Court, where the need for effective measures against racial discrimination was considered.

What did the Supreme Court address?

The proceedings considered recommendations made by a committee headed by M.P. Bezbaruah and the need for mechanisms to prevent discrimination and protect citizens.

Why is this judgment important?

It highlights that national unity cannot exist without equality, dignity and mutual respect.

Civic lesson: Being from a different state, speaking another language or following a different cultural tradition should never become a reason for discrimination.

CATEGORY 7: DUTY TO STRIVE TOWARDS EXCELLENCE

Article 51A(j)

11. State of U.P. v. Yamuna Shanker Misra (1997)

Background of the case

The case concerned the preparation of confidential reports and assessment of government officers. These reports are important in evaluating an officer's work, conduct and professional performance.

What did the Supreme Court decide?

The Court discussed the importance of preparing confidential reports fairly and objectively.

It referred to Article 51A(j), which emphasises the responsibility to strive towards excellence individually and collectively.

Why is this judgment important?

It demonstrates that excellence is not restricted to academic achievements or personal success. It also applies to professional conduct, public administration and the quality of services provided to society.

Civic lesson: Every citizen contributes to the nation's progress by performing their responsibilities honestly and efficiently.

CATEGORY 8: DUTY OF PARENTS AND GUARDIANS TO PROVIDE EDUCATION

Article 51A(k)

12. Society for Un-Aided Private Schools of Rajasthan v. Union of India (2012)

Background of the case

The Right of Children to Free and Compulsory Education Act, 2009, introduced provisions to improve access to elementary education.

One important provision required covered private unaided non-minority schools to reserve at least 25% of entry-level seats for children belonging to weaker sections and disadvantaged groups.

Some private schools challenged the constitutional validity of this requirement.

What did the Supreme Court decide?

In April 2012, the Supreme Court upheld the relevant provisions as applicable to government schools, aided schools and unaided non-minority schools.

It held that the 25% admission requirement for the specified private schools was constitutionally valid, while excluding minority educational institutions protected by Article 30(1).

Why is this judgment important?

It demonstrated the importance of ensuring that children from economically weaker and disadvantaged backgrounds have access to elementary education.

Civic lesson: Education is essential to building an informed and responsible society. Parents, guardians, schools and governments all have roles in ensuring that children receive educational opportunities.

Understanding the 11 Fundamental Duties through landmark judgments

Article 51A Fundamental Duty Relevant judgment

(a) Respect the Constitution and national symbols Bijoe Emmanuel (1986)

(b) Cherish the ideals of the freedom struggle No single case discussed here

(c) Uphold India's sovereignty, unity and integrity Constitutional harmony jurisprudence

(d) Defend the country and render national service when called upon No single case discussed here

(e) Promote harmony and brotherhood Karma Dorjee (2016)

(f) Preserve India's composite cultural heritage No single case discussed here

(g) Protect the environment and show compassion for living creatures M.C. Mehta; Nagaraja

(h) Develop scientific temper, humanism and inquiry Nagaraja (2014)

(i) Safeguard public property and reject violence Destruction of Public Property (2009)

(j) Strive towards excellence Yamuna Shanker Misra (1997)

(k) Provide educational opportunities to children aged 6–14 Society for Un-Aided Private Schools (2012)

Conclusion: Rights come with responsibilities

The Supreme Court's judgments demonstrate that responsible citizenship is not limited to obeying laws or paying taxes.

It also means protecting rivers, reducing plastic pollution, treating animals with compassion, preserving public property, respecting different communities and contributing towards the country's progress.

The Constitution provides the framework, the judiciary interprets and protects it, the government implements its obligations, and citizens give these principles meaning through their everyday actions.