Third Generation Environmental Rights Related to Environmental Decision-making and Genetically Modified Organisms for Sustainable Development

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ABSTRACT
Third generation environmental rights have developed out of the loggerhead situation of the promotion of development and trade, including international trade, and conservation of the environment. It was first realised at the UN Conference on Human Environment 1972 that unfettered developmental might adversely affect the environment and can thus cause deleterious impact on its quality, which, in effect, may be detrimental to the humanity. It gave rise to the idea of sustainable development, which encompassed all human activities and dictates them to be environmentally responsible. It has to be judged on the basis of Impact Assessment. Third generation environmental rights together strive to save the world from the ultimate disaster. Right to access to information, right participate in environmental decision-making, access to justice, right to get precautionary principle applied to genetically modified organisms (GMOs) and right to information with respect to GM food are crucial environmental rights among them. The paper discusses them, except access to justice, and offers certain suggestions for ensuring these rights to the benefit of all.

Prelude:
After the world wars, the economic condition of people in general and states in specific had deteriorated beyond sustainable limit, which had brought widespread sufferance to people, especially those living in developing and least developed countries. This has resulted in some sort of denial of economic and social rights of the people, as inherent right to get subsistence was in jeopardy. In view of this, economic development became the priority of all states. In order to achieve it as fast as possible, they resorted to the idea of laissez-faire of industrial development supplemented with green revolution, as agricultural growth and development of industries were sine qua non for a healthy social development. The economic growth, especially in developed countries, became conspicuously visible; whereas, it could also be seen to some extent in developing and least developed countries. In 1972, at the United Nations Conference on Human Environment, it was realised that unfettered industrialisation might adversely affect the environment, which might affect the various human interest. It was realised in the Stockholm Declaration that, “In our time, man’s capability to transform his surroundings, if used wisely, can bring to all peoples the benefits of development and the opportunity to enhance the quality of life. Wrongly or heedlessly applied, the same power can do incalculable harm to human beings and the human environment. We see around us growing evidence of man-made harm in many regions of the earth: dangerous levels of pollution in water, air, earth and living beings; major and undesirable disturbances to the ecological balance of the biosphere; destruction and depletion of irreplaceable resources; and gross deficiencies, harmful to the physical, mental and social health of man, in the man-made environment, particularly in the living and working environment”. For a comprehensive development, the Declaration emphasised on: Man bears the responsibility to protect and improve the environment for present and future generation; natural resources must be safeguarded for present and future generations; wildlife and their habitats must be conserved; economic and social development is essential for ensuring a favorable living and working environment for man and for creating conditions on earth that are necessary for the improvement of the quality of life. It gave a clear message to strike a balance between environment and development by all means. It also emphasised on all kinds of cooperation among the states so that the environmental condition in developing and least developed countries could be improved and sufferance of the people could be alleviated. This became the
starting point of the third generation environmental rights. The 1987 Report of the World Commission on Environment and Development: Our Common Future emphasised on these aspects of common human rights and came out with the idea of a comprehensive development where rich and poor developed and developing countries co-exist and proper together, which it termed as ‘sustainable development and which is commonly known as ‘develop without compromising with the interest future generations. The idea of comprehensive development, thus, requires striking a meaningful balance between environment and development. It is a complex and an arduous task, but there is no other choice. Sometimes, judges and policy-makers are caught in the horns of dilemma, which of the two has to be preferred. Based on the state practices and judicial delineations, authors have drawn a conclusion that there cannot be a uniform parameter or rule to decide all situations. It has to be decided on case-to-case basis keeping in view the greater degree of public interest. Where economic development is considered to be more important and damage to the environment is not so significant, development should be preferred. On the contrary, if the damage to the environment is substantial and development can so momentous, protection of the environment should be preferred. It is for this reason the idea of environment impact assessment has been developed and is being practiced in determining such imperatives. The International Court of Justice and apex courts of almost all jurisdictions have emphasised it in a number of cases. That is why states have enacted law to this effect. In situations where people might directly suffer from any proposed developmental activities, social impact assessment is also warranted. These have to be pursued by internal and external audits. According a good number of countries, even when an EIA and or SIA are positive, if environment or people are adversely suffering, as the case may be, from the developmental activities, an appropriate officer can stop the development project, and project can be re-started only on explanation given by the project owner to the satisfaction of the officer. Sometimes, projects are within the policy of the government but people, as the major stakeholder feel that the project might be detrimental to them, the projects are abandoned. This happens more in democracies, as government cannot afford to go against the popular will of the states.

Contemporary laws in almost all countries, appropriately give input of public participation in almost all decision-making or environmental policy determination. It is actually for two reasons: one, to recognise the environmental and personal rights of the affected people; two, public participation may help highlight aspects which were not anticipated by decision-makers.

In spite of this, people may feel that they might be affected. In this situation ensuring peoples’ right to access to court become significant. In some countries, where judicial activism has taken in its fold prevention and control of environmental pollution, for the sake of providing justice to a large number of people, who cannot bear the cost of justice thus remain silent sufferers, judges of higher courts invoke their original jurisdiction, register genuine public interest litigations and provide environmental justice to them. This is like bringing justice to those who are poor and indigent. This could be possible only when a number NGOs and individual environmental activists took initiatives and files public interest litigations. In order to recognise the right to pollution free environment to poor, courts relax the requirement of *locus standi* and register cases. Public interest litigations help develop environmental jurisprudence in several countries, notably in India.

The above paragraphs are indicative of the fact that right to pollution free environment is now a matter of priority in almost all courtiers. Protection of this right encompasses a vast area of the environment, e.g. conservation of the biodiversity, terrestrial and aquatic, maintain the purity of the atmosphere and outer space, maintain the balance in the lithosphere, and hydrosphere. All states have constitutional provisions, either specific or to be covered under right to life with or without duty not to pollute. They are working hard to enforce them in order to protect this right of their citizens. However, it has not been effectively controlled due to limited trained personals, limited resources, including financial resources and lack of environmentally sound technologies. It has been emphasised time and again at various international meetings, independent or under convention’s conference of parties that developed countries will extend appropriate help to their developing and least developed counterparts so that they could work side-by-side with them. The authors are of the opinion that without sufficient financial and technological support developing and least developed countries cannot keep their promised that they have made being members of conventions, regional and global, and protocols made under them.

There is yet another pertinent issue relating to human consumption and introduction of GMOs (living and non-living) into the environment. It is universally accepted in both under the international trade law and international environmental law that all GMOs must be subject to precautionary principle, which generally means that if anything is proposed to be introduced into the environment or for human consumption and its effect is not known, it has not to be introduces, and which warrants that before introducing them, intensive filed and lab tests should be conducted. Application of the precautionary principle is actually for protecting personal and environmental rights of the people around the world [13 and 16]. However, the problem pertaining to applicability of this principle is that this principle in the SPS Agreement, which is a part of the WTO legal regime, is different than that of its scope in the Cartagena Protocol, which has been made under the Convention on Biological Diversity. The irony is that both serve two different purposes: one is there to promote
international trade of GMOs; and second to conserve the biodiversity of the world. But when the matter goes to the WTO Panels and AB, they tend to lean towards promoting international trade rather than conservation of the biodiversity. This principle is not only applied at the international level, but at the national level also it is invoked to protect the right to life of the citizens. Append to it is right to information, i.e. right to know the ingredients which the consumers are consuming. This right is protected under the right to life guaranteed under almost all constitutions of civilised countries. But there are a number of countries, which do not give heed to this right.

The will first discuss the meaning and scope of sustainable development. It will then examine the international law and law in Malaysia as Malaysian on impact assessment with special emphasis on public participation. The paper then critically examines the salient features of the scope of applicability of precautionary principle in the two sets of laws. It will go further to discuss right to information. These are very significant for sustainable development.

**Sustainable Development: Conceptual Delineation:**

In understanding the concept of sustainable development from the Islamic perspective, it is pertinent to examine the essential features, which are commonly known as the environmental, economic and social dimensions of sustainable development. A close study on conservation of the environment and the role of mankind in achieving it is significant for sustainable development. The three dimensions of sustainable development are comprehensively addressed in the primary sources of law. They are considered interdependent, as any of them cannot be completely bifurcated from others. A holistic approach to sustainable development, as illustrated in Figure 1 below, begins with the human being who needs natural resources to survive. He must manage those resources in a sustainable manner through the conservation of the environment to ensure a sustainable society that will consider the interest of the future generation. There is a need for the conservation of the environment for a sustainable society; and without a sustainable society, there cannot be a sustainable environment, and a sustainable economy.

![Fig. 1: The Holistic Approach of Sustainable Development.](image)

Precautionary principle noted above is part of sustainable development as if the effect of something to be introduced into the atmosphere or for human consumption may adversely affect human health or the environment and, thus, may not be sustainable. This kind of development on this basis can be said to be unsustainable. So is the case of polluter pays principle. The Indian Supreme Court has also said: “The legal position regarding applicability of the precautionary principle and polluter-pays principle which are part of the concept of sustainable development in our country is now well settled. In *Vellore Citizens’ Welfare Forum v. Union of India* (1996) 5 SCC 647, a three-Judge Bench of this Court, after referring to the principles evolved in various international conferences and to the concept of “sustainable development”, inter alia, held that the precautionary principle and polluter-pays principle have now emerged and govern the law in our country, as is clear from Articles 47, 48-A and 51-A (g) of our Constitution and that, in fact, in the various environmental statutes including the Environment (Protection) Act, 1986, these concepts are already implied. These principles have been held to have become part of our law. Further, it was observed in Vellore Citizens’ Welfare Forum case that these principles are accepted as part of the customary international law and hence there should be no difficulty in accepting them as part of our domestic law. Reference may also be made to the decision in the case of *A.P. Pollution Control Board v. Prof. M.V. Nayudu* (1999) 2 SCC 718, where after referring to the principles noticed in Vellore Citizens’ Welfare Forum case the same have been explained in more detail with a view to
enable the courts and the tribunals or environmental authorities to properly apply the said principles in the matters which come before them. In this decision, it has also been observed that the principle of good governance is an accepted principle of international and domestic laws. It comprises of the rule of law, effective State institutions, transparency and accountability and public affairs, respect for human rights and the meaningful participation of citizens in the political process of their countries and in the decisions affecting their lives. Reference has also been made to Article 7 of the draft approved by the Working Group of the International Law Commission in 1996 on “Prevention of Transboundary Damage from Hazardous Activities” to include the need for the State to take necessary “legislative, administrative and other actions” to implement the duty of prevention of environmental harm. Environmental concerns have been placed on the same pedestal as human rights concerns, both being traced to Article 21 of the Constitution. It is the duty of this Court to render justice by taking all aspects into consideration. It has also been observed that with a view to ensure that there is neither danger to the environment nor to the ecology and, at the same time, ensuring sustainable development, the court can refer scientific and technical aspects for an investigation and opinion to expert bodies. The provisions of a covenant which elucidate and go to effectuate the fundamental rights guaranteed by our Constitution, can be relied upon by courts as facets of those fundamental rights and hence enforceable as such (see People’s Union for Civil Liberties v. Union of India [1997] 3 SCC 433). The Basel Convention, it cannot be doubted, effectuates the fundamental rights guaranteed under Article 21. The right to information and community participation for protection of environment and human health is also a right, which flows from Article 21. The Government and authorities have, thus to motivate the public participation. These well-enshrined principles have been kept in view by us while examining and determining various aspects and facets of the problems in issue and the permissible remedies” (quoted from Research Foundation for Science v. Union of India and Others, Writ petition [civil] 1995).

The Supreme Court has rightly said that the two principles are inseparable parts of sustainable development. But in all cases the principle of proportionality will be the deciding factor. As stated above, if development is imperatively demanded and damage to the environment is not so significant, development should be allowed to proceed. On the contrary, if damage to the environment is eminent, development will not be allowed (see Invertis University v. Union of India Ors., National Green Tribunal, 18 July 2013). This idea got prominence at the World Congress on Justice, Governance and Law for Environmental Sustainability, 17-20 June 2012 [26].

Based on the above discussion, it is clear that sustainable development has three factors: 1. Economic factor, which refers to economic development, especially industrialisation, encompasses development of human settlements and infrastructure development. 2. Social factor, which warrants dissemination of relevant information to the stakeholders (public), public participation in environmental decision-making and access to justices. It also warrants conducting social impact assessment, and applicability of precautionary principle, polluter pays principle, intergenerational equity principle. 3. Environmental factor requires EIA to be conducted genuinely. It has to be followed by internal and external auditing. And if necessary, work to be stopped by the appropriate authority. All the components of the three factors are inseparable. Rather, they complement each other in order to achieve the common objective of sustainable development.

The International Court of Justice in Gabčíkovo–Nagymaros Project (Hungary v. Slovakia) [1997] ICJ Rep. 7, ruled: Throughout the ages, mankind has, for economic and other reasons, constantly interfered with nature. In the past, this was often done without consideration of the effects upon the environment. Owing to new scientific insights and to a growing awareness of the risks for mankind for present and future generations of pursuit of such interventions at an unconsidered and unabated pace, new norms and standards have been developed, set forth in a great number of instruments during the last two decades. Such new norms have to be taken into consideration, and such new standards given proper weight, not only when States contemplate new activities but also when continuing with activities begun in the past. This need to reconcile economic development with protection of the environment is aptly expressed in the concept of Justice Veeramantry).

This passage reflects the sole reference to sustainable development in the eighty-page majority decision. Nonetheless, it is important in two respects. First, the Court did not elaborate on the definition of sustainable development [1, 39 and 41] and it did recognise the utility of the notion as a useful tool in balancing environmental protection as well as economic development. The complete picture of sustainable development can be depicted from figure no. 2.

**Principle 10 and Aarhus Convention on Protection of Environmental Rights:**

Principle 10 of the Rio Declaration and the Aarhus Convention ensure a number of environmental rights of the people who might suffer from developmental activities in the form of right to access to information, right to participate in decision-making where environment can adversely be affected which will, in turn, affect the people and their beneficiaries and right to access to justice. They, in totality, are known as public participation [10 and 11].
In its widest possible form, thus, public participation is crucial in the decision-making for proper enforcement of law and bringing justice to door steps of a class of people, who might, directly or indirectly, be affected by the proposed activity and remain silent sufferers [30]. Sometimes, projects have to be abandoned in view of the strong public opinion against them. For achieving these objectives, public awareness has to be a priority endeavour in matters essential with respect to the condition of the environment vis-a-vis developmental activities and strategies required for abatement and control of environmental degradation. It, along with other imperatives, has specifically been incorporated in the Convention on Environmental Impact Assessment in Transboundary Context 1991 (Article 4 of the Convention makes distribution of the documentation to the authority and the public of the affected Party in the areas likely to be affected and their submission of comments as a mandatory requirement in the process of making an EIA) and the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 1998, which is commonly known as Aarhus Convention and which is now of global importance (this may be noted that Aarhus Convention is a Convention of EU and European countries, but its treaty norms are of great importance to all countries of the world). Among these international legal instruments, Aarhus Convention is of great importance. In spite of the fact that at the time of the drafting of the convention it was not anticipated that it could be a useful instrument for making EIAs more realistic, the convention is significantly helpful in striking a meaningful balance between environment and development.

**Fig. 2:** A Comprehensive Account of Sustainable Development.

**Principle 10:**

So as to affirming the cardinal sustainable development principle, Principle 10 of the Rio Declaration states, “Environmental issues are best handled with participation of all concerned citizens, at the relevant levels...At the national level, each individual shall have appropriate access to information concerning the environment that is held by public authorities ...and the opportunity to participate in decision-making process. States shall facilitate and encourage public awareness and participation by making information widely available. Effective access to judicial and administrative proceedings, including redress and remedy, shall be provided”. This principle, thus, has four pillars: appropriate access to information; opportunity to participate in decision-making process; enhance public awareness; and effective access to judicial and administrative proceedings. By virtue of the first pillar, people should not only have access to information but the access should be appropriate, and the information should be widely available. The fourth pillar requires access to justice by providing opportunity to have access to both judicial proceedings and administrative proceedings. It means people should have freedom to institute cases without any technical or legal impediment. This Principle is becoming a parameter for sustainable development in many countries. For example, in Cuba, the principal instruments of Cuban environmental management, such as the National Environmental Strategy, the National Programme for Environment and Development, the Law on the Environment and other legal instruments have provisions to implement these imperatives [36]. The authors are of the opinion that this implies that with respect to environmental matters, the requirement of *locus standi* should be relaxed by the courts, where a larger group of people are affected or can be affected. It will be appropriate to leave the question of applicability of *locus standi* to the courts. Access to justice administrative decisions will require from the authorities of the DOE to take feedback from the public and to be transparent in decision-making. If the right(s) of the people at this level is violated, they should have right to invoke writ jurisdiction of higher courts of the country.

These pillars are applicable to EIAs and SIAs also. Many states, including Malaysia, have provided in their laws about application of these imperatives, but actual practices are not the same in all countries [43]. The total
picture is not so encouraging. In view of this, the UNEP Governing Council has requested states to intensify efforts and promote the four imperatives of the Principle 10. In view of this, it is believed that states will improve upon the present conditions of public participation in environmental matters.

It is notable here that the Principle 10 has been strengthened by the Rio+20, which might all states to incorporate its requirements in their laws and policies, has been honestly internalised by 69 countries. Actually, the most bothering aspect of development and its impact on the environment and human health is that there has to be transparency in the process, and many states do not want to release all information to people. What is now warranted is that right to information has to be recognised as fundamental rights of citizens as that can be the sufferer from the errant developmental activities. It is for this reason it is emphasised that Principle 10 should be given due importance by the UN bodies, especially UNEP and UNDP and a larger number of states. But the problem is that the UNEP is not popular in many countries. It is for this reason the United States wants it to be status of UNEP with a broader mission and power [24]. So far the EU countries have shown the best results, which can be a benchmark for other countries. Under the auspices of the United Nations Economic Commission for Europe (UNECE) lots of work is underway to implement sustainable development imperatives [44]. The authors are of the opinion that Principle 10 is for greater public participation in development activities, which will always be for health development where people as a whole will benefit; a partisan development, which prefers one class on the other class or only serves the vested interest of the country, is not good. Among the developing countries South Africa and Malaysia are giving due importance to Principle 10. This is unfortunate that many states are not enthusiastic about the Rio+20, which is the scheduled to be held in June 2012, is unfortunate. This is the time to join hands and to sincerely work for sustainable development. A first “zero draft” of the outcome document, *The Future We Want*, was published in January 2012. It focuses on the UN brief that the central themes should be the green economy and the UN’s institutional framework for sustainable development. All states should seriously study it and come out with viable briefs so that after discussions, an amicable solution to issues could be reached [35]. States should maintain environmentally related pollution release and transfer register (PRT Register) within the premises of Principle 10 and the Aarhus Convention. It will require states to collect all information about pollution releases and transfers, register them, and provide access to it the people. This helps in many countries to experts from the public, especially members of NGOs to help department of environment officials to keep up the Agenda 21 and Local Agenda 21 requirements.

*Aarhus Convention:*

The Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 1998, which is commonly known as Aarhus Convention and which is now of global importance. The three pillars of the Aarhus Convention can better be understood with reference to EIA. As stated above, public participation in decision-making in an environmental matters brings together developers, government authorities and the public that helps to clear up misunderstanding and hatches a better understanding of relevant issues, meets public needs, enhances access to environmental information, leads to better development decisions, results in fewer court cases because areas of controversy are identified and most of them are hammered out at the early stage of the development or planning process, minimises public frustration and anger, potentially enhances public trust of government decision-making, and strengthens credibility of the EIA regime [21, 29 and 46]. Cost and benefit study also reveals that public participation at the initial stage of a project saves both time and money [22 and 37]. All countries knew these facts, but very few of them gave heed to these because they wanted to develop faster. The level of public participation can be chosen by states according to their suitability, but it is better to have it at the initial stage. However, if a country has provision for preliminary and detailed EIA reports, both should have requirement of mandatory public participation. For these, enough time should be provided. This has to be preceded by active as well as passive environmental information. It is worth noting here that in *Berkley v. Secretary of State for Environment* [2000] 3 WLR 420 the court has rightly held that in a decision-making pertaining to an EIA, public should be properly involved. Lord Hoffman stressed that the directly enforceable right of the citizen under the UK Directive on EIA was not merely a right to a fully informed decision on the substantive issue. It must have been adopted on an appropriate basis and that required the inclusive and democratic procedure prescribed by the Directive in which the public, whoever misguided or wrongheaded its views, would have been given an opportunity to express its opinion on the environmental issues. It is notable that the decision has a wide connotation. Proper public participation is imperative in cases where development, even at local level, is to be proposed and carried out by a body of peoples’ representatives. This decision of House of Lords has a realistic approach.

Initially, those who opened EIAs for public comments did not receive encouraging response due to lack of enough environmental information and encouragement for it to the affected public and NGOs. These facts were noticed by the European Union. So as to have a realistic public participation in decision-making and access to justice the Aarhus Convention was negotiated [40 and 45].

As stated above, the Aarhus Convention, which has come into force on 30th October 2001, instills and strengthens the participatory democracy for sustainable development by making public participation as *sine qua
non in decision-making on environmental matters, by guaranteeing right of access to environmental information and by providing opportunity to access to justice (see Article 1 of the Convention) [3]. These have to be based on ‘floor’ not ‘ceiling’ basis” and should be available free from fear or favour. It lays a sound foundation for ordinary people independently or through non-governmental organisations (NGOs) to push the authorities for protection of the environment. In this context, **suo motu** participation of NGOs can also be of great importance [31].

Access to information covers both ‘active’ and ‘passive’ information. Thus, authorities are duty bound to provide information on request, and also disseminate it to the general public by various means. In case a development plan is mooted, all environmental information are supposed to be provided to the general public living in the vicinity of the proposed project and might directly or remotely be adversely affected by it. If a person or a group of persons require any additional information, it has to be furnished (see Article 4 of the Convention). In this connection the following points are notable: 1. This right is available to all. 2. Information has to be provided as soon as possible. If justified, the time can reasonably be extended. 3. Information can be provided in any form. 4. Charges, if any, have to be reasonable. 5. Information can be denied if denial is in the interest of national defence, protecting international relations, ensuring public security, maintaining commercial confidentiality (except for withholding information on emissions which is relevant for the protection of the environment), protecting intellectual property right, or guaranteeing personal privacy. 6. Public interest is an important factor. 7. Refusal supported with reasons should be issued in writing. 8. In case of any dispute, the matter has to be referred to any higher authority. 9. Possibly, information should be released by Internet. 10. Authorities have to be up to date and should regularly disseminate environmental information through regularly published reports or by any other suitable means.

The Aarhus Convention sets out certain essential requirements to enable the public to participate in various categories of environmental decision-making. Although it does not mention about public participation in EIAs, it may be considered as an essential policy instrument in the process of making them (see Article 6 of the Convention). In this context, the following points are notable: 1. The activities enlisted in Annex I of the Convention, which is similar to the list of activities for which an EIA or Integrated Pollution Prevention and Control Licence required under the EU legislation, are subject to EIAs and certain degree of public participation is required for them. 2. Public participation requires: timely and effective notification of the public concerned; reasonable timeframes for participation, including provision for participation at an early stage; a right for the public concerned to inspect information relevant to the decision-making free of charge; an obligation on the decision-making body to take due account of the outcome of the public participation; and prompt public notification of the decision, with the text of the decision and the reasons and considerations on which it is based being made publicly accessible [44]. 3. Authorities have to make a viable plan for an efficient public participation (see Article 7 of the Convention). 4. There should be a time frame and provision for early participation.

One of the important aspects of the Aarhus Convention is access to justice. It has three dimensions: 1. Review with respect to information request. 2. Review with respect to project(s) decision-making that requires public participation. 3. Challenges to breaches of environmental law (see Article 9 of the Convention). Among these, the third point is the most important as it provides redress opportunity to aggrieved persons who objected to any project or suggested substantial changes in the EIA report and the authority concerned either ignored them or gave little importance to them. There can be an appeal to the higher administrative authority, including the Minister; or the aggrieved persons may go to the regular court of justice. Article 9(5) aims to address concerns over the high level of expense often associated with review by courts. To this end, the Convention requires that each Party to the Convention to consider the establishment of what are described as ‘appropriate assistance mechanism’ in order to ‘remove or reduce financial and other barriers to access to justice’. Presumably, this provision contemplates some form of legal aid or other financial assistance and expert assistance [3]. It is notable here that the Aarhus Convention does not preclude the affected parties from opting for speedy justice like public interest litigations, which are common in India, the Philippines and many other countries, where **locus standi** is relaxed in matters of the interest of general public. It means in such situations, a case can be brought by an NGO or individual environmentalist for protecting the interests of the public who are affected or might be affected by any proposed project of development. If an individual fights the case or a group of individuals or NGO or a group of NGOs, the poor sufferers are relived of all kinds of financial burden of the litigation.

The treaty norms of Aarhus Convention presumably provide a basis for streamlining public participation imperatives in EIA laws with respect to local developmental plans and other developmental activities in all countries. This has been stated in point 40 of the declaration at the close of the Ministerial Conference on the Aarhus Convention in the following words: “We regard the Aarhus Convention, which provided recognition for citizens’ right in relation to the environment, as a significant step forward both for the environment and for democracy. We encourage all non-signatory states to take appropriate steps to become parties to the convention” [31]. Political leaders have hailed the Convention as an ambitious venture in environmental democracy provided
the three aspects detailed in the Convention are properly adhered to [17 and 19]. Kofi Annan, the former Secretary General of the United Nations put this as: “Although regional in scope, the significance of the Aarhus Convention is global. It is by far the impressive elaboration of principle 10 of the Rio Declaration, which stresses the needs for citizen’s participation in environment held by public authorities. As such it is the most ambitious venture in the area of environmental democracy so far undertaken under the auspices of the United Nations”. This has been cited in United Nations Economic Commission for Europe Press Release of 29 October 2001. At the discussion session, the Denmark’s Minister for Environment and Energy remarked that the Convention laid a sound foundation for ordinary people to push for environmental progress in all of our countries. He further said that criticism was essential to democracy…to direct the process of involvement, to give voice to the general public, inspiration to political parties and governments and to provide an informed critical, corrective, NGOs involvement is essential [31]. However, the right can be best be ensured to general public, especially the affected people, by active information dissemination, meaningful participation of the public concerned and efficient involvement of NGOs. Mary Robinson, United Nations High Commissioner for Human Rights, in her keynote address, which was distributed at the NGO session, also stressed on these aspects. She wrote: “To secure that (fundamental right) we need to have access to environmental information and so I welcome the proposed convention making such access binding — and I look forward to the implementation of the details of the convention. We do not need fine rhetoric or well-written conventions that Gather dust; we need determined, immediate and true follow up to the expressed wishes of the parties involved. With proper access to information I believe that there will be a dramatic increase in the demand for public participation in environmental decision-making. The opportunity for the public, individuals or more usually NGOs, to become involved must be built in so as to allow full participation from the beginning of the process, e.g. in the scooping of an environmental impact statement and not just in commenting on it if once completed. This will put demands on national and local authorities but it will also lead to better environmental management and to sustainable development. Another meeting points of the rights is in the area of access to justice… I regard NGOs as having a public interest ‘watch dog’ is vital in all our societies and is in need of our strong support” [31].

The decision on conclusion of the Aarhus Convention by the EC was adopted on 17 February 2005 by ‘Decision 2005/370/EC’. It became a party to it in May 2005. The EU through its Directive 2003/35/EC and ‘Directive 2003/4/EC’ has enforced the treaty norms of the Aarhus Convention. With the result of that the Directive 85/337/EEC on EIA, which had been earlier amended by Directive 97/11/EC. On 24 October 2003, a proposal for a Directive of the European Parliament and of the Council on Access of Justice in environmental matters was presented. This proposal was the part of the ‘Aarhus Package’. This was adopted in September 2006 [23].

The new Directives are being enforced in EU countries via necessary amendments in relevant legislations. Thus, in England for example the Town and Country Planning (Environment Impact Assessment) (England and Wales Regulations) 1999 has suitably been amended. The norms are being given effect by courts also. For example, in R (on the application of Hareford Waste Watchers Ltd.) v. Herefordshire County Council [2005] EWHC 191 (Admin); [2005] PLSCE 29 the claimant company had been formed to oppose the construction of a waste-treatment and recycling facility in an industrial estate. Following the submission of a planning application, the Council granted full planning permission, subject to conditions. This was objected on the ground that relevant information was not provided to the affected persons. Elias J quashed the planning permission saying that the Council had not conclusively found that the development would not have significant environmental effect. The authorities were wrong to grant permission subject to conditions. Article 3(2) of the 1999 Regulation provides that planning should not grant planning permission ‘unless they have first taken the environmental information into account’[18]. However, the British courts have ruled in a number of cases that where an appropriate body comprising representatives from the public takes decision of development, public participation is not necessary [37 and 47]. In R v. Secretary of the State for the Environment, Transport and the regions (ex parte Alconbury) [2001] UKHL 23 reminded it by saying that it was the role of the elected representatives to take decision on behalf of the local communities they represent. The authors are of the opinion that it is no more tenable in light of the Aarhus Convention. European Countries that have not yet been brought within the fold of the European Union but are members of the Aarhus Convention are also enforcing the treaty norms by making suitable laws or by making required amendments in the existing legislations [17]. It can now be said that due to costs hike and delay of the project, in many cases, proponents are in a hurry and want to projects started soonest possible. In some cases, authorities also want to start certain projects without any delay, and sometimes prefer developments on environment or/people. In spite of this tendency, in a large number of cases, the benefits of undertaking EIAs were unimaginable, and with the result of those interests of the environment, its processes and people benefiting from them could be protected. The Aarhus Convention and regulations made for enforcing its treaty norms will further enhance the EIA process, and due to vigorous public participation, these interests will further be augmented. In the whole process, the role of the policy makers is central. It is their responsibility to provide active and passive information, provide opportunity of participation,
most appropriately by bringing together relevant authorities, proponents of development and the public, to be affected and others. It is they who will ultimately give the input of the meeting(s) into EIAs and SIAs.

Based on the above paragraphs, it can be said that the three pillars of the Aarhus Convention are essential tools for ensuring sustainable development. Public participation can make environmental decisions more realistic; and in case of arbitrariness in decision-making process, people can resort to courts for justice. Although the Convention has specifically been made for EU countries, other countries, including Malaysia, can also become its members. Likewise, although it does not specifically mention about EIAs, it will be appropriate to apply the three pillars in the process of making EIAs and SIAs.

**EIAs, SIAs and SEAs (IA):**

Since EIAs are prudent and efficient preventive tool for protecting the environment from being degraded due to developmental activates that are necessary for economic development, most of the countries have formally recognised it and have suitably enacted law to enforce it. It is notable that almost all countries, developed and developing, have some kind of law for making EIAs. Although these laws follow the basic idea of protecting the environment, their modalities differ according to their suitability and political will of states. It will be pertinent to mention here that developed countries and their people prefer to tougher preventive laws because they can afford to have them; on the contrary, developing countries, which have to go a long way and invariably suffer from lack of financial resources, scarcity of sophisticated technologies and fewer number of trained personnel, would not either like to follow laws of that standard or would fail to enforce such laws. They, thus, prefer to remain at the lower threshold of EIA laws.

The scope of EIAs has further been widened by associating it with social impact assessments, if necessary, where proposed activities might leave adverse socio-economic or cultural impact, especially where due to such activities, a sizable number of people will have to be displaced or will otherwise be affected presently or in future [25]. In such situations, it is said that both EIAs and SIAs must go hand-in-hand. The best example of this is construction of a dam, which might displace a large number of people, and in case of breach it might cause a widespread damage to people and their beneficiaries. Another best example is making infrastructures. In short EIA is a tool whereas future environmental and social impacts of any present or future activity are the results. It has environmental, social, economic and cultural dimensions, e.g. preserving the cultural identity of indigenous people, preserving the monuments of world heritage like Taj Mahal. In its widest possible connotation, environmental impact can be understood as the process of assessing or estimating, in advance, adverse environmental and social consequence that are likely to follow from specific policy actions or development project, particularly in the context of appropriate national, state or provincial environmental legislation and development activities carried on under it. ‘Social impacts’ includes all social and cultural consequences immediate or in the past to human populations of any public or private actions that alter the ways, in which people live, work, play, relate to one another, organise to meet their needs, and generally cope as members of the society. Cultural impacts involve changes to the norms, values and beliefs of individuals that guide and rationalise the cognition of themselves and their societies [38]. They, thus, have potential to contribute to planning process and developmental activities in a positive way. In additions to enforcing some kind of EIA mechanism, it is also recognised by some international environmental conventions and other international legal instruments of a ‘soft law’ nature as a necessary preventive measure to be adopted by member states.

Environment impact assessment gets international importance where any proposed project is expected to leave deleterious impact on the environment or people or both. In that case, the laws of both the countries in light with relevant international legal instruments have to be considered for preparing an amicable EIA. If a larger number of countries are supposed to be affected, the scope of an EIA for any proposed project widens and, thus, requires the regional law on it, if it there, to be taken into consideration, if not, laws of all countries are required to be given due consideration.

At international level, there are a number of legal instruments relating to EIAs; the more focused one among them is the CBD law on it. This has also been recognised by the international tribunals, including the international court of justice (ICJ). Justice Veeramantry recognised its importance and stressed on the importance of the continuous repeated) environmental impact assessments as long as it (the project) continues in operation. He perhaps tried to say that such assessment should not be done only once at the beginning of the project. Rather, it should be a continued process as long as a project continues in construction and operation. It is because he said that the standards applied in such continuous monitoring should be the standards prevalent at the time of assessment and not those enforced at the commencement of the project” [28].
The idea on environmental impact assessment (EIA) of Justice Veeramantry has been carried forward in its logical form by the International Court of Justice in *Argentina v. Uruguay* (commonly known as pulp Mill Case) [27]. There was a long-standing dispute on two paper pulp mills along the Uruguay River, which forms the international border for Argentina and Uruguay. The construction and operation of the two mills polluted the river, which was protested for a long time by the Argentine people who lived along the river and environmental activists of the countries. The matter went to the International Court of Justice (ICJ). Argentina claimed that Uruguay breached the treaty obligation under the 1975 statute of the River Uruguay and failed to provide an EIA of the two mills on the surrounding areas. The ICJ pronounced its judgment on 20 April 2010. The Court agreed with Argentina but did not order for closing the paper pulp mills. The ICJ, however, stated that in such matters, an EIA, as a potent preventive measure, was the requirement of international environmental law. Pertaining to this case the court said, “...it may now be considered a requirement under general international law to undertake an environmental impact assessment where there is a risk that the proposed industrial activity may have a significant adverse impact in a transboundary context, in particular, on a shared resource. Moreover, due diligence and the duty of vigilance and prevention which it implies, would not be considered to have been exercised, if a party planning works liable to affect the regime of the river or the quality of its waters did not undertake an environmental impact assessment on the potential effects of such works” [28].

Instead of determining rules pertaining to EIA, the Court rightly left it on the states. It ruled, “…it is for each state to determine in its domestic legislation or in the authorisation process for the project, the specific content of the environment impact assessment required in each case, having regard to the nature and magnitude of the proposed development and its likely adverse impact on the environment as well as to the need to exercise due diligence in conducting such an assessment. The Court also considers that an environmental impact assessment must be conducted prior to the implementation of a project. Moreover, once operations have started and, where necessary, throughout the life of the project, continuous monitoring of its effects on the environment shall be undertaken” [12, 10 and 28].

It is notable here that the ICJ emphasised on the importance of EIAs, which the implementation tool for Principle 10 and sustainable development, and stressed on cooperation among the states, which might be affected from the proposed project, for making a viable EIA.

This is a healthy development of international environmental law pertaining to EIAs. It would have been better if the ICJ would have given its verdict also on intergenerational equity and environment audit as well which are also considered as tools for transforming sustainable development imperatives into practice. If we go through the EIA laws, we find that they are subsumed in the law. However, it is a matter of surprise that the ICJ rejected public participation, especially of those who could be affected by the project, which is greatly emphasised at both international and national levels. In the Aarhus Convention, public participation is one of its three pillars. In most of the national laws on environmental impact assessment, there are provisions of public participation. National courts are backing it also. Another surprising methodology adopted by the ICJ was to consider experts as counsel rather than appointing a competent fact finding body. It is notable here that the best way, which is generally being resorted to by national courts of many countries, is to appoint a competent facts finding body comprising experts in the area to which the case is concerned, consider their report(s) and summon them to testify. It is for this reason that Judges Al Khasawneh and Simma criticised the method adopted by the Court [27].

An EIA process generally contains the following imperatives: identification and prediction of significant effect of the proposed activity on the environment; evaluation of various alternatives that are available for the proposed activity; suggestions about mitigating measures to alleviate the deleterious unacceptable impacts on the environment; selection of the best among the alternatives; and presenting these in a form of a report before the appropriate authority for its approval and its ultimate approval or rejection. As a matter of general practice, some activities, which might have greater degree of chances to leave deleterious effect on the environment, have been subjected to a mandatory EIA, and some other activaties, which may or may not have adverse effect on it, are left to have it on optional basis. It is a generally accepted procedural practice that the proponent of the activity gets an EIA prepared by experts that are generally registered with or approved by the Department of Environment (hereinafter DOE) or any other appropriate body and submits it to the designate authority. The process has to have input of public participation, so that the EIA could be more viable. The authority scrutinises the EIA report through certain experts and issues appropriate orders. The authority may approve the preliminary report with or without any conditions, or may reject it. Rejection does not amount to disapproval of the proposed project. In this case, the proponent is not debarred from submitting another report. In case of certain additional information is warranted by the authority, the proponent is required to modify the report accordingly and re-submit it. After the input of suggested modification in the report, final report takes the shape. At this stage public participation is crucial. The widely accepted practice is that the EIA is left open for few months for public comments. Individuals and NGOs can express their opinions, and their opinions are given due importance. Public participation is in line with Principle 10 and the Aarhus Convention. It is approved with or without certain conditions to be followed throughout the implementation of the project. With respect to certain
activities, which might seriously affect the environment, detailed EIA reports are prepared by a group of experts, and the reports are intensively scrutinised by another group of experts at DOE. In some countries, including India, based on the proposed project, a prototype replica of the project is made, and it undergoes an intensive kind of testing for two-to-three months. The project is allowed only when experts at the Department of Environment and the Testing Department approve it.

It is notable here that there is Convention on Environmental Impact Assessment in a Transboundary Context, Espoo, Finland, February 25, 1991, 30 ILM 802, which entered into force on 14 January 1998. But this law alone cannot cover all kinds of international activities, which may possibly cause deleterious impacts on the environment and its processes. Thus, in order to have a comprehensive approach, other relevant treaties have to be taken into account, for example, international and regional conventions on migratory species, convention on endangered species, conventions to prevent transboundary air pollution. In all cases, bilateral or multilateral cooperation, as the case may be, is important. It is notable that for an amicable EIA, public participation is sine qua non, i.e. the people who are supposed to be affected have right to express their opinions and they have to be given due importance. It will be better if NGOs are also invited along with representatives of the people over the discussion [34]. On-going projects are subject to follow up EIAs/Audit. Thus, a project that has an approved EIA can be stopped if subsequent EIA reveals that allowing the project to go further will leave irreparable deleterious effects on the environment. In the whole process, the substantive law contained in the specific environmental legislations and legislations on town and country planning and supported with suitable subsidiary laws, made there under - to facilitate making EIAs, to ensuring public participation and to get them through the approving authorities - play the central role. Some countries have incorporated the EIA law in their town and country-planning regime [2]. So as to provide guidance in preparing EIA reports, suitable guidelines have also been made. Malaysia has the three sets of laws: Environmental Quality Act, 1974; Environmental Quality (Prescribed Activities) (Environment Impact Assessment) Order 1989; and A Handbook of Environmental Impact Assessment Guidelines, 2000.

In the whole process, public participation is generally considered as a relationship between the public and the decision-maker that ranges from provision of information sharing and reaching consensus on the form and modality of the proposed development planning or developmental project through various forms of interactive consultations. This is because for various reasons, direct public control in the decision-making on all kinds of EIAs, is crucial. Notable among them are: infusing into them the basic idea of environmental democracy as it brings all stakeholders, the proponent, the government authorities and the public, together; linking environmental rights and human rights; and ensuring environmental justice. There is no definition of public participation. It has not been defined by the Aarhus Convention. The EIA Centre Review Paper has some idea about it [20]. It also provides opportunity to a large group of people to think about the possible adverse impact of proposed projects on the environment and the society, which will invariably bring in a sense of confidence about development projects and will suggest certain measures to be taken that were not anticipated by proponents or the experts at the DOE.

In its widest possible form, thus, public participation is crucial in the decision-making for proper enforcement of law and bringing justice to door steps of a class of people, who might, directly or indirectly, be affected by the proposed activity and remain silent sufferers [30]. Sometimes, projects have to be abandoned in view of the strong public opinion against them. For achieving these objectives, public awareness has to be a priority endeavour in matters essential with respect to the condition of the environment vis-à-vis developmental activities and strategies required for abatement and control of environmental degradation. It, along with other imperatives, has specifically been incorporated in the Convention on Environmental Impact Assessment in Transboundary Context 1991 and the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 1998, which is commonly known as Aarhus Convention and which is now of global importance. Among these international legal instruments, Aarhus Convention is of great important. In spite of the fact that at the time of the drafting of the convention it was not anticipated that it could be a useful instrument for making EIAs more realistic, the convention is significantly helpful in striking a meaningful balance between environment and development.

The contemporary position is that Environment Impact Assessment, Strategic Environmental Assessment (SEA) and Social Impact Assessment are taken into account collectively. This comprehensive approach is gaining prominence as it has widest possible coverage in the interest of state, the environment and people. We have already noted about AIA and SIA. Together they are known as impact assessment (IA). An SEA is for policies, plans and programs which the government wishes to bring. Like policy framework about incineration of solid wastes, dumping of wastes, establishing plants that generate nuclear wastes, development on hills and hill slopes, including making dams on hills, and urbanisation keeping in view the total picture of the socio-economic development.

For EIAs and SIAs, the European Commission has made Directive 2011/92/EU (known as EIA Directive) and Directive 2001/42/EC (SEA Directive). The EIA Directive has been revised and the revision has come into force on 15 May 2014. On 16 May 2013, it made Guidance on the Application of the Environmental Impact
Assessment Procedure for Large-Scale Transboundary Projects comprising certain principles to be complied with by the Member States. The commission on 4 April 2013, issues Guidance on Integrated Climate Change and Biodiversity into Environmental Impact Assessment and Integrated Environmental Assessment. These European Commission’s documents are useful to other countries as well. The European Commission also issued on 14 March 2013, as a guide to interpret the Directives and the Aarhus Convention, the Commission issued Environmental Impact Assessment of Projects: Ruling of the Court of Justice.

The Islamabad Declaration 1013, declared upon conclusion of the South Asian Environmental Assessment Conference, 4-5 December 2013 and adopted on 5 December 2013, contains the following cardinal points for the success of EIA and SEA: 1. To encourage participation of all stakeholders. 2. To maintain transparency review and approval. 3. Engagement of the media to create and strengthen the understanding among the people. 4. Making them as part of the syllabi at educational institutions. 5. Capacity and qualifications of those which are involved in making them. 6. Commitment to continuous improvement of professional standards and ethics in the environmental assessment industries. 7. Review, reform and effective enforcement of laws, rules and procedures related to environmental assessment. 8. Monitoring implementation of conditions laid down as part environmental clearance. 9. As for as possible, development takes place with minimal negative impact on biodiversity and natural resources.

**Application of the Precautionary Principle to Protect Environmental Right:**

As stated above, application of precautionary principle pertaining to introduction of genetically modified organisms (GMOs, which includes living modified organisms, LMOs) is aimed at to protect in general the environment and human, animal, plant life and health in specific, because such researches are being conducted to provide food for the ever increasing population of the world, especially in developing and least developed countries. In strict sense, it entails that if the adverse impact(s) of such introduction cannot be ascertained, better do not introduce it. The adverse impacts are ascertained by conducting repeated laboratory and field-testing. If these are strictly followed, both the adverse and useful impacts can be ascertained. But the irony is that almost all companies engaged with genetics wish to cash their research by selling their product locally and by exporting it mainly to developing and least developed countries, because these countries are facing high inflation and are in dire need of food. Some scientists engage in gene-manipulation research and they aspire to introduce their outcome for name and fame. Some biotech companies also become interested in marketing their research for monetary gain. While they are doing so, they forget about the ethical and moral aspects of what they are doing.

In order to protect their environment and people, some countries have adopted to go public and take opinions of scientists, NGOs and the citizens on their new researches, especially conducted by biotech companies. The *Br. Brinjal* in India is the best example. One of the Indian biotech companies invented *Br. Brinjal*, which could produce toxin its own in order to be safe from insects, which are responsible to destroy a large part of the crop. The Indian government organised meeting of stakeholders, scientists and NGOs. These meetings concluded that this brinjal variety might not be good to human health. Then the Indian government sent it back to the company with an order to conduct more lab and field-research. Field-research is important for knowing adverse effect, if any, of the LMOs. It is said that if there is enough buffer zone around the agricultural field where GM variety is being cultivated. If this is not maintained, other varieties will get contaminated; and in due course of time, the traditional varieties will vanish. It will be a great loss to the environment and scientific researches to be conducted on local varieties. This kind of situation resulted in Cambodia. Farmers there were growing only few rice species. With result of that, other varieties vanished. When local scientists wanted to further their researches on local rice varieties because they had adapted the Cambodian environmental conditions, they were handicapped. Fortunately, those varieties were there in the International Rice Research Institute, the Philippines. Luckily, the terminator technology has now been rejected and, thus, farmers are safe. Otherwise, they could have become slaves of the company, which were engaged in producing terminator seeds.

At international level, the adverse impacts of GMOs and GM-food were recognised. It is for this reason that the Cartagena Protocol on Biosafety 2003, made under the Convention on Biological Diversity (CBD), enforced certain rules to apply the precautionary principle on export and import of GMOs if it may affect human, animal, plant life and health. It warrants that both the exporting country and the importing country must conduct safety lab and field safety experiments, and they should follow the advance informed Agreement (AIA). Similarly, the WTO Sanitary and Phytosanitary Agreement (SPS Agreement) has been made at the UN Conference on Environment and Development 1992. It also requires the same. But since both have different objectives to achieve, one promotes international trade and the other aims to conserve the environment. This has resulted in both the legal regimes at the loggerheads. In the interests of the general public and the environment, the WTO should have taken a stand to come out with such and interpretation of the provisions of the SPS agreement, which could have amicably resolved the conflict situation. Had it done so, it could have been in the interest of both, international trade and protection of the environment. On the contrary, in almost all the cases, the DSB Panels and the Appellate Body decided in favour of trade rather than doing so. The Committee on Trade and
Environment at the WTO has also failed to come out with any concrete proposal to set both to co-exist amicably. This committee was supported by the CTS-Special Session (CTE-SS), but this also proved to be of no results [4, 5, 6, 7, 8, 9, 14, 15, 32 and 33]. The authors are of the opinion that looking at the right of people of the world and their interest in the conservation of the environment, it is urgently warranted that: the conflict between the trade law and environmental law should be resolved soonest possible; the WTO Panels and the Appellate Body, in future, should come out with a balanced approach so that their reports could serve both, international trade in GMOs and protection of human, animal, plant life and health; the WTO and the CBD Secretariat should develop close cooperation; states, exporting and importing, should make law for determining the safety aspects of GMOs at the national level and should enforce them with enough political will to protect the environment and human health.

People have right to know as to what are being offered for them to eat. This right is eminent as it falls under the right to life guaranteed by almost all civilised states. This right requires having labeling on all GM products to be directly or indirectly consumed by man. Western countries have recognised this right of their people. In them, this right is being enforced properly because people there are very much health conscious; they do not like to eat any product that has GM content in it. Likewise, manufacturers GM products also know that if they do not have labeling, they cannot market their GM products. On the contrary, in a large number of developing and least developed countries, people as well as governments do not care about this. This is because people are not so health conscious, and governments for protecting their economic interests, do not care about it. Authors are of the opinion that labeling should be made compulsory in all countries.

Conclusion:
Right to access to information, right to participate in environmental decision-making, right to access to justice, application of precautionary principle with respect to introduction of any GMO into the environment or allowing it for human consumption, as the case may be, right to information about GM food are third generation environmental rights thus crucial for protection of human health and conservation of the environment. These rights have well been incorporated in Principle 10 of the Rio Declaration, Aarhus Convention, SPS Agreement and Cartagena Protocol. These rights together constitute integral part of sustainable development as they attempt to strike a meaningful balance between environment and development. But these rights can well be ensured only if there is political will on part of every state to protect its people and the environment. For example, appropriate public participation especially in EIAs and genuine application of precautionary principle in international trade of GMOs are sine qua non for conservation of the environment and protection of human health. Thus, every state must sincerely follow the international laws and should enact local laws in order to enforce the international laws. But some states, for their economic or other vested interests do not care about these: EIAs are considered to be secondary, it is, in many cases are considered as for granted. Likewise, some states do not strictly follow the international law for applying the precautionary principle. So is the case with respect to granting right to information by making GM labeling as compulsory. It is also that most of the environmental problems are global or interrelated. It is for this reason, with other reasons, developed countries are required to liberally transfer environmentally sound technologies, to reasonably mobilise financial resources, and to aspiringly train citizens of developing and least developed countries and provide logistic support so that they could become self-dependent in conserving their environments and could move their countries forward sustainably.

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