

M.C. Mehta v. Union of India (Oleum Gas Leak)

Environmental Law · (1987) 1 SCC 395 · 1987

Facts

Oleum gas leak from Shriram Foods and Fertilizer.

Issues

Liability of hazardous industries.

Arguments

Strict liability vs. absolute liability.

Decision

Absolute liability rule introduced.

Legal Principles

Enterprises engaged in hazardous activities are absolutely liable.

Ratio Decidendi

No exceptions to Rylands v. Fletcher-style liability in hazardous industry.

Obiter Dicta

Article 21 includes right to clean environment.

Important Quotes

- An enterprise engaged in a hazardous or inherently dangerous activity owes an absolute and non-delegable duty.

Exam Notes

Pillar of Indian environmental jurisprudence.

Interview Notes

Compare with Bhopal gas tragedy.

Precedents

- Rylands v. Fletcher (departed from)

Articles / Sections

- Article 21
- Article 32