



COMPULSORY MEDIATION-SHOULD BE INTRODUCED BUT GRADUALLY

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ABSTRACT

The Indian judiciary is heavily burdened by the pendency of cases. Litigation often costs the parties a lot of time and money. Alternative dispute resolution methods have emerged as a way to resolve disputes without going down the conventional litigation route. These methods are often more flexible, less time-consuming and less expensive. Mediation is one such alternative dispute resolution method that has much potential in the Indian legal space if used successfully. In a mediation process, the negotiations between the parties are facilitated by a neutral third party, the mediator, who helps them reach a mutual agreement. It is a voluntary, informal and confidential process. It is a better alternative to the traditional method of litigation. It can save the parties time and money and preserve their relationship. High acceptance of mediation can reduce the burden on the judiciary. Because of these benefits, compulsory mediation is being introduced as a pre-condition for litigation in some countries. In India, it is mandatory for some commercial disputes. India has followed the example of these countries and introduced a provision for compulsory pre-mediation in civil and commercial disputes through the Mediation Bill 2021. Mandatory mediation can reduce case pendency and promote mediation. However, it is often criticized as it goes against the voluntary nature of mediation. In India, the introduction of compulsory mediation is a step in the right direction, but the current infrastructure in India is not suitable for the introduction of compulsory mediation. It should be introduced in India, but gradually.

Keywords – Mediation, Alternative Dispute resolution, Mandatory mediation, Litigation, Pendency of cases in the judiciary, Mediator

INTRODUCTION

India's judiciary is overburdened by the number of cases it has to handle. More than 4 crore total cases in India are pending at district levels of the judiciary right now.⁴⁵The figure for the High Court is 60 lakh total cases.⁴⁶ More than 70,000

cases are pending in the Supreme Court right now.⁴⁷ The current infrastructure of the judiciary is under-equipped to handle this huge pendency of cases. Because of various reasons like lack of judges, lack of infrastructure and no fast trial the load of the number of cases on the Indian judiciary is very high. Anyone opting for

⁴⁵NJDG National Judicial Data Grid (District and Taluka Courts of India), <https://njdg.ecourts.gov.in/njdgnew/index.php> (Accessed: 17 June 2023).

⁴⁶National Judicial Data Grid (High Courts of India), Welcome to NJDG - National Judicial Data Grid for high courts of India,

<https://njdg.ecourts.gov.in/hcnjdgnew/?p=main%2Findex> (last visited Jun 15, 2023).

⁴⁷Supreme Court of India (no date) Statistics | SUPREME COURT OF INDIA. Available at: <https://main.sci.gov.in/statistics> (Accessed: 17 June 2023).



litigation for India has to go through a tiresome time taking process. Settling a dispute in court can take up a lot of time and resources. Because of these reasons, Alternative Dispute resolution is increasingly growing popular. Parties and organizations are opting out of litigation and choosing alternative dispute resolution methods. Arbitration, conciliation, negotiation, mediation, and Lok Adalat are alternative dispute resolution methods that are prevalent in India.

Mediation is one of these methods where the session between parties is mediated by a neutral third party, the mediator. It is one of the most flexible dispute resolution methods in which the interest of the parties participating is a priority. Mediation along with other dispute-resolution methods is witnessing increased acceptance. Online mediation witnessed a rise in popularity and wider acceptance during the pandemic.

Though it is gaining popularity the potential of mediation is still not realized. There is still a lack of awareness and many other institutional challenges facing their larger acceptance. There is a need for steps to increase awareness about these methods.

Mediation Bill 2021 was introduced in parliament with the aim "to promote and facilitate mediation, especially institutional mediation, for resolution of disputes, commercial or otherwise, enforce mediated settlement agreements, provide for a body for the registration of mediators, to encourage community mediation and to make online mediation as acceptable and cost-effective process and for matters connected therewith or incidental thereto."⁴⁸

Mediation can be under court oversight, institutional mediation or international mediation. The bill made a provision for compulsory mediation. It is important to understand whether compulsory mediation is good for the scope of mediation in India and if made compulsory the manner in which the

rules should be formed. For this it is important to understand the process of mediation, the scope of mediation and

I-MEDIATION

"An ounce of mediation is worth a pound of arbitration and a ton of litigation."

–Joseph Grynbaum

Mediation is one of the most convenient processes in alternative dispute resolution methods. It is an informal process and flexible process. In mediation session parties are facilitated by a neutral third party known as the mediator. The mediation helps both parties participating in a mediation session to reach a compromise keeping in mind their interest, and their consensus is recorded in a mediation agreement. The mediator identifies the interest of the parties, their objectives for participating in mediation, and the barriers to reaching the solution. It is important to note that the work of the mediator is only limited to creating a conducive environment for communication between the parties, she does not propose solutions to the parties in the mediation process. It is different from arbitration where the arbitrator is a decision-making authority.

The mediation process is completely voluntary; both parties have the freedom to walk out of the mediation process any time they want. Any agreement that is reached at the end of the process necessarily needs the consent of both parties to be binding. It's also a confidential process. Mediation helps parties to reach an amicable solution without going through the conventional process of litigation which saves their money, and time and the parties have more control over the process of mediation as compared to litigation. No hard and fast rule guides mediation like litigation whose result is guided by the law applicable to the particular set of facts.

Mediation is a very effective method of resolving disputes in commercial or family disputes. It is a speedy process that keeps the

⁴⁸The Mediation Bill, 2021, Bill No.43 of 2021 (December,20 2021).



interest of the parties as a priority. It is an amicable, easier, less time-consuming, and cost-effective method of resolving disputes between the parties. It is clear that mediation is one of the best possible dispute resolution methods available to the parties that allow them to communicate with each other; the main goal of mediation is to reach a common ground acceptable to both parties, unlike litigation where one party wins the suit or trial. Mediation also saves the trouble of appeal and revision for parties.

It provides an easy and early solution to the parties and helps to preserve the relationship between parties. It focuses on solutions through collaboration and coordination between the parties. The solution reached is not the decision of the adjudicator but the parties involved, the agreement reached has the maximum chances of enforceability as the agreement was reached after considering the consent of both the parties and their mutual agreement. As was observed by a judge mediation is a “win-win”⁴⁹ situation.

“There is always a difference between winning a case and seeking a solution. Via mediation, the parties will become partners in the solution rather than partners in problems. The beauty of settlement through mediation is that it may bring about a solution which may not only be to the satisfaction of the parties and, therefore, create a win-win situation, the outcome which cannot be achieved by means of judicial adjudication.”⁵⁰

In mediation, parties are not subjected to laws that are out of their control and the adjudicator they can't choose but they participate in a process where they both reach a compromise with their consent.

II-SCOPE OF MEDIATION IN INDIA

As explained above mediation offers a better alternative as compared to conventional

methods of litigation. Mediation can help the Indian judiciary reduce the huge burden of cases it has to deal with daily and can help reach parties with an amicable solution in an economical and time-saving way.

In India mediation and other alternative dispute resolution are gaining acceptance. Many corporate houses are introducing arbitration and mediation centers. In India, at present mediation can be accessed in two ways the first is through private mediation and the second is through court-annexed mediation. In court-annexed mediation, the court can refer the parties to resolve their dispute through mediation through section 89 of the Code of civil procedure in the pending cases. It states

“Where it appears to the Court that there exist elements of a settlement which may be acceptable to the parties, the Court shall formulate the terms of settlement and give them to the parties for their observations and after receiving the observations of the parties, the Court may reformulate the terms of a possible settlement and refer the same for:--

- (a) arbitration;
- (b) conciliation
- (c) Judicial settlement including settlement through Lok Adalat: or
- (d) Mediation.⁵¹

Section 89 of the Code of Civil Procedure establishes guidelines for the referral of issues to other conflict resolution processes, such as mediation. The parties are required to cooperate in good faith and the courts are given the authority to recommend cases for mediation or any other ADR approach. This clause gives the courts the power to promote mediation and other ADR procedures as a way of resolving disputes, however, it does not legally mandate mediation. This clause is utilized by courts in case of family or matrimonial disputes.

⁴⁹M/S. Afcons Infra. Ltd. & Anr vs M/S Cherian Varkey Construction Ltd & Anr 2008 (8) SCC 24

⁵⁰Id

⁵¹The Civil Procedure Code 1908, §89



Although the provision allows the court to refer disputes to ADR courts are not utilising the potential of the provision. Courts are not referring enough disputes to the ADR. There is recognition of the potential of mediation in India but the process is still in the nascent stage in India. There are few myths and barriers that serve as a barrier to its acceptance like justice received is not equivalent to litigation⁵² and lack of clarity on enforceability of the mediation agreement reached by the parties.⁵³

There is no separate legislation governing mediation in India. A Mediation Bill 2021 was introduced in the parliament but the bill has yet to become an act. This potential is recognized by the judiciary and legislature of India. The mediation bill introduced by the government highlighted the commitment of the government towards the promotion of mediation in India. In developing a precise structure for the mediation process in India, Bill represents a significant advancement. The Bill aims to address numerous facets of the fundamental procedures and tenets of mediation, including concerns about discretion, autonomy, and voluntariness. It offers a framework for the regulation of mediation practice and, more importantly, a method for local and international mediated agreements to be recognized and enforced. The key provision in the bill includes making provisions for compulsory mediation, provision for the establishment of the mediation council of India, making provision for the role of the mediator and

III-COMPULSORY MEDIATION

The term "compulsory mediation" refers to a procedure where parties to a legal dispute must participate in mediation as required by law or a

court order before moving on with a formal trial or suit. This allows the parties to gain clarity and a chance to resolve their dispute before engaging in litigation.

As is sometimes misconstrued, "mandatory mediation" does not imply that parties must arbitrate their differences. Simply put, it implies requiring parties to try mediation. It has been called 'coercion into and not within' the mediation process.⁵⁴ There are certain provisions in India for compulsory mediation. The Mediation Bill 2021 also has a provision for compulsory mediation as per section 6 (1) of the bill.

"Subject to other provisions of this Act, whether any mediation agreement exists or not, any party before filing any suit or proceedings of civil or commercial nature in any court, shall take steps to settle the disputes by pre-litigation mediation in accordance with the provisions of this Act."⁵⁵ The Bill mandates that individuals attempt to resolve civil or commercial disputes via mediation before going to any court or tribunal. After two mediation sessions, a side may end the mediation. The parties can thus opt out of mediation after two sessions.

Currently, the 2015 Commercial Courts Act has a provision for mandatory mediation. According to this Act, parties are obligated to participate in mediation before bringing a formal lawsuit in certain types of commercial disputes that surpass a certain monetary level. To encourage the parties to look into settlement possibilities and reach an amicable resolution to their issue, the Act requires pre-institution mediation as a condition of filing a lawsuit.

"A suit, which does not contemplate any urgent interim relief under this Act, shall not be instituted unless the plaintiff exhausts the remedy of pre-institution mediation in

⁵²Juhi Gupta, *Bridge over Troubled Water: The Case for Private Commercial Mediation in India*, 11 American Journal of Mediation 11: 59, 62 (2018), https://heinonline.org/HOL/Page?handle=hein.journals/amjm11&div=7&g_sent=1&casa_token=4aK7Jlo5dDcAAAAA:1W-vFw5gLuG2SzU-wB5uZmYBeEHpmXe1y1rS_eEQ0imLmDhd3_lpX022mhT1teDu_HoQuluYQXia (Accessed 15 June 2023)

⁵³Deepshika Kinhal, Apoorva, *Mandatory Mediation in India - Resolving to Resolve*, 2(2) Indian Public Policy Review 46, 53 (2020), <https://vidhilegalpolicy.in/wp-content/uploads/2021/03/Mandatory-Mediation-in-India-Resolving-to-Resolve.pdf> (Accessed 15 June 2023)

⁵⁴Quek Dorcas, *Mandatory Mediation: An Oxymoron? Examining the Feasibility of Implementing a Court Mandated Mediation Program*, 11 Cardozo Journal of Conflict Resolution 479, 485 (2010), <https://ssrn.com/abstract=2843509> (Accessed 15 June 2023)

⁵⁵The Mediation Bill, 2021, Bill No.43 of 2021, §6(1) (December, 20 2021).



accordance with such manner and procedure as may be prescribed by rules made by the Central Government.⁵⁶ Compulsory pre-litigation mediation can serve as a better way to resolve disputes. It encourages people to work together to reach a settlement. A mediation session before the trial can increase the chances of reaching a solution acceptable to both parties without going through a process of litigation. This will save parties their time and money as mediation is less costly and time-consuming as compared to litigation.

This can also preserve the relation between the parties in cases of matrimonial or commercial dispute, as both parties are heard to reach an amicable. The same is not true in a litigation where one party emerges victorious which can harm the relationship between the parties. The countries that have opted for the model of compulsory mediation like Italy and Turkey have also seen some success in it. It is also a good way to give a push towards mediation. This allows mediation to flourish in India and also takes the heavy burden off the back of the Indian judiciary.

However, the merits of compulsory mediation are not without drawbacks. The biggest criticism of this procedure is that it is against the essence of mediation. It is argued as an antithesis to mediation.⁵⁷ Mediation is a completely voluntary process and to make participation in mediation compulsory is against the basic definition of mediation. In addition, this process of compulsory mediation can also be used by some parties just to delay the litigation and frustrate the other party who may have a stronger case against them.

Those who argue for the process make the case it can serve as an educating tool and create awareness about benefits mediation. While these may be valid worries, it may also be argued that when parties have to take part in

mediation, they may be better equipped to see the benefits of it. A reluctant adversary may need to be compelled to engage in a process for them to be made recognise the many benefits of mediation.⁵⁸ The approach should, at the very least, prompt parties to evaluate their case realistically early on and may improve chances for a future settlement.⁵⁹

To argue that compelling parties to just consider mediation by giving it a chance for two sessions is not equivalent to making mediation a compulsory process parties can still opt out after two sessions. The author does not agree to the idea that mediation is no longer a voluntary process if the parties are just compelled to sit at the table and not forced to arrive at an agreement.

It is argued it can change the way our current legal system works. Mandatory mediation calls for a certain reorganisation of how we perceive the judicial system. When everything else fails, turn to the courts as a last choice for conflict resolution rather than as the first option. By demanding mediation first, the parties' channels of contact are maintained open or restored, allowing them to control their own futures rather than leaving them in the hands of a third party of an unknown.⁶⁰

With few valid criticisms, mandatory mediation can be a successful model for reducing the burden of the judiciary and promoting the mediation. If implemented carefully, it can be prove an effective mechanism for both mediation and judiciary. The rules framed for mediation should make sure that parties are only pushed to sit at the table for meditation but they should not be forced to stay any more than necessary.

⁵⁶Commercial Court Act 2015, § 12A

⁵⁷Stella Vettori, *Mandatory Mediation: An Obstacle to Access to Justice*, 15(2). African Human Rights Law Journal 355,356 (2015)http://www.scielo.org.za/scielo.php?script=sci_arttext&pid=S1996-20962015000200007 (Accessed 15 June2023)

⁵⁸Campbell C. Hutchinson, *The Case for Mandatory Mediation*, 42 LOY. L. REV. 85,91

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IV-COMPULSORY MEDIATION IN INDIA

The provision for compulsory mediation is a positive step. The provisions introduced are not highly coercive in nature, the parties are not forced to arrive at a settlement through mediation. Parties have to attend a mere two compulsory mediation sessions. It is a way to just push parties to consider out-of-court settlements and force them to opt out of litigation. The provision is not strict it is flexible it just pushes parties towards considering mediation. And mediation is not made compulsory in cases of criminal matters where the parties can be hostile to each other and facing the accused can be traumatic for the victim. The kind of disputes for which mediation is made compulsory is also not a valid criticism of the provision. Even these two sessions are not compulsory for parties in certain situations. According to Section 8 of the Bill, parties may also seek urgent interim relief before the start of or during mediation proceedings by filing the proper paperwork with a court or tribunal of competent jurisdiction. If the court or tribunal grants or rejects the party's request for urgent interim relief, as the case may be, it will then refer the parties to mediation to resolve the dispute, if it is deemed appropriate.⁶¹

Apart from this universally true criticism of compulsory mediation specifically in the case of India, it is not possible now to make mediation compulsory immediately. The step should be introduced in India but at the appropriate time. Indians do not have such easy access to mediators or mediation centers. There is still a lack of good mediators in India. India does not have enough infrastructures to support compulsory mediation right now. Training programmes for mediators in India have been cellular in nature, with each institution utilizing its own model of mediation orientation and providing both basic and advanced training courses. Each center has its

own requirements for certification. There has not yet been any real coordination to establish minimum training requirements (in terms of learning objectives, trainer qualifications, and experience), or guidelines for the recognition of mediation qualifications. Despite these flaws, several of these institutes have demonstrated great success on an individual basis based on the referrals they have received. Well qualified mediators are need of hours, those who can interact with the rural India and also successfully conduct online dispute resolution. The profession should be more attractive for the legal practitioners and law students.

If the institutional and infrastructural issues are addressed compulsory mediation is a good step. It should be introduced and the government should work on making mediation accessible to everyone. Instead of making pre-litigation mediation compulsory at once the government should opt for a phase-by-phase introduction of mandatory mediation with simultaneously creating enough groundwork for the implementation of the clause. It is also important to note that without real awareness and acceptance of the process, the process of imposing the mediation on both parties can result in making it only one of procedural capacity those parties have to go through to finally approach courts. This will defeat the purpose as it will increase both the cost and time required by the parties to resolve the dispute. A professional and good mediator that explains the process of mediation is necessary. The introduction of such a provision requires the availability of a good mediator in adequate numbers as a pre-condition for its effective implementation.

CONCLUSION

Alternative dispute resolution methods are increasingly gaining acceptance in India and mediation is one such method that has a lot of potential to become a widely accepted method of resolving disputes instead of litigation. It is a process where a third neutral party makes a conducive environment for sitting together and

⁶¹The Mediation Bill, 2021, Bill No.43 of 2021, §8 (December,20 2021).im

arriving at a compromise. It is a better method as compared to litigation. It saves costs and time for the parties. It also reduces the burden on the judiciary.

Realizing these benefits a provision for compulsory mediation was introduced in Mediation Bill 2021. The bill made it compulsory for the parties to go through mediation where parties have to go through a minimum of two mediation sessions before litigation. This provision can reduce the burden on the judiciary and promote mediation. It is a step in the right direction and should be introduced but enough infrastructures should be made for its implementation. Instead of at once mandatory mediation should be introduced in a phase by phase, gradually for its easier and more effective implementation.

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