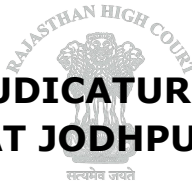




**HIGH COURT OF JUDICATURE FOR RAJASTHAN
AT JODHPUR**



D.B. Civil Writ Petition No. 5128/2026

CNR: RJHC010180112026 | URN: CW / 9180U / 2026

Apoorva Agrawat D/o Jaydev Prakash, Aged About 34 Years, R/o 573, Gandhi Nagar, Mandiya Road, Pali, District Pali, Rajasthan - 306401

-----Petitioner

Versus

1. State Of Rajasthan, Through The Principal Secretary, Government Of Rajasthan, Environment Department, Jaipur, Rajasthan.
2. Principal Secretary, Department Of Tourism, Government Of Rajasthan, Jaipur, Rajasthan.
3. Chief Conservator Of Forests (Hoff), Aranya Bhawan, Jhalana Institutional Area, Jaipur, Rajasthan.
4. Deputy Conservator Of Forest, Pali, Near Railway Station, Pali, Rajasthan.
5. District Collector, Pali, Collectorate Pali, Rajasthan.
6. Regional Transport Officer (Rto), District Pali, Rajasthan.
7. Union Of India, Through The Secretary, Ministry Of Environment, Forest And Climate Change, Indira Paryavaran Bhawan, Jorbagh Road, New Dehli - 110003.

-----Respondents

For Petitioner(s)	: Mr. Vikram Nimbark. Mr. Dilip Kumar. Mr. Harsh Gupta. Mr. Mahendra Kumar Gurjar.
For Respondent(s)	: Mr. Bharat Vyas, Sr. Adv. & ASG (through VC) assisted by Mr. Vaibhav Bhansali. Mr. T.C. Sharma. Mr. Mahaveer Bishnoi, AAG, assisted by Mr. Harshvardhan Singh. Mr. Narendra Singh Rajpurohit, AAG, assisted by Ms. Kanchan Jodha. Mr. B.L. Bhati, AAG, assisted by Mr. Deepak Chandak. Dr. Sachin Acharya, Sr. Adv. assisted by Mr. Sharad Kothari & Mr. Pranjul Mehta.



Mr. Ritu Raj Singh Rathore.
Mr. Vikas Bijarnia.
Mr. Manish Patel.
Mr. Nikhil Ajmera, with
Mr. Bharat Singh Rathore.
Ms. Abhilasha Bora.
Mr. Dinesh Pal Singh Charan.



HON'BLE DR. JUSTICE PUSHPENDRA SINGH BHATI
HON'BLE MS. JUSTICE REKHA BORANA

Judgment

Reportable

1. Date of conclusion of arguments	25.08.2026
2. Date on which judgment was reserved	25.08.2026
3. Whether the full judgment or only the operative part is pronounced:	Full Judgment
4. Date of pronouncement	05.09.2026

Per Dr. Pushpendra Singh Bhati, J:

1. The present Public Interest Litigation has been instituted raising concerns regarding the protection of leopard habitat, caves, dens, breeding sites and wildlife-movement corridors in the Jawai region of District Pali and seeking regulation of construction, tourism, safari operations, fencing and other activities alleged to be adversely affecting the ecological integrity of the landscape. The petitioner has claimed the following reliefs:

"a. Issue an appropriate writ, order or direction directing the Respondent State to identify, map and notify all active leopard caves, dens and breeding sites in the Jawai region of District Pali, Rajasthan, including villages Kothar, Vellar, Mori Bera, Raghunathpura, Varaval, Bera, Doodni, Jeevda, Sena, Bisalpur and Perwa.. Direct the Respondents to undertake a comprehensive scientific assessment of the entire Jawai landscape and to rationalise, consolidate and suitably extend the existing "Jawai Dam Leopard Conservation Reserve" notifications dated 27.02.2013 and "Jawai Dam Leopard



Conservation Reserve-II" notification dated 15.06.2018 so as to include all remaining leopard-inhabited hills, caves, foothills and movement corridors, in the Jawai region of District Pali, Rajasthan, including villages Kothar, Vellar, Mori Bera, Raghunathpura, Varaval, Bera, Doodni, Jeevda, Sena, Bisalpur and Perwa, while ensuring that traditional grazing rights of local communities remain unaffected.

b. Direct that no construction activity of any nature shall be permitted within a minimum aerial distance of 1000 Meters from the foothills of identified leopard caves and dens. All No Objection Certificates (NOCs) granted for any type of constructions within 1000 meters from foothills, where leopard cave/den is situated, be declared null and void. Direct review and reform of the No Objection Certificate granting process, so that wildlife presence and habitat sensitivity are mandatorily assessed before issuance. Direct that NOCs granted in violation of wildlife protection principles be reviewed and reconsidered. All NOCs must be reviewed again on new parameters of distance.

c. Direct prohibition of barbed wire fencing within a radius of 2000 meters from the foothills of leopard caves/dens, so as to ensure free and safe movement of leopards and other wildlife. Direct removal or modification of existing fencing that obstructs established wildlife corridors. Direct District Collector Pali to remove all encroachments on the lands of Rajasthan Government, which is illegally occupied by method of barbed wire fencing by any person or any tourism unit.

d. Direct the Respondents to frame and notify specific guidelines for tourism activities in the Jawai region, including location, design, scale and operation of tourism units. Direct that no tourism unit shall be conceptualized or marketed on the premise of direct visual access to leopards from rooms or private premises, as such practices cause continuous disturbance to wildlife. Direct suspension of approvals and construction of tourism units found to be in violation of wildlife protection norms.



e. Direct the Respondents to regulate safari operations in the Jawai region on parity with established wildlife tourism models, including those applicable in National Parks and Wildlife sanctuaries. Direct fixation of:

maximum number of safari vehicles,

designated routes,

Timing restrictions including complete ban on night safaris.

Mandatory conduct guidelines for safari operators.

Direct the Regional Transport Authority to ensure that:

No old or mechanically unfit vehicle is permitted for safari purposes, at par with norms adopted in other national parks and wildlife sanctuaries.

Vehicles comply with fitness, emission and noise norms.

f. Direct constitution of a multi-departmental committee comprising representatives of:

Forest Department,

Revenue Department,

Tourism Department,

Local Administration,

And wildlife experts, to oversee implementation of directions issued by this Hon'ble Court.

g. Direct periodic reporting to this Hon'ble Court regarding compliance and ecological impact.

h. Any other appropriate order which this Hon'ble Court deems fit and proper in the facts and circumstances of the case, may also kindly be passed in favour of the petitioner."

1.1. By order dated 23.03.2026, this Hon'ble Court, inter alia, restricted safari and wildlife-spotting activities to the period between 6:00 a.m. and 7:00 p.m.; restrained the use of torchlights, searchlights, spotlights, drones and similar devices for





disturbing or locating wildlife; and directed prompt action against misconduct by safari operators and other persons.

1.2. By a detailed order dated 28.04.2026, this Court treated the matter as one requiring continuous mandamus and issued interim directions applicable to the Jawai region, including the notified Jawai Leopard Conservation Reserves, the villages specified therein, and caves, hills, foothills and corridors forming part of leopard habitat and movement. Construction, except duly permitted construction in village abadi areas, was restrained without permission of this Court; status quo concerning commercial tourism establishments and construction disturbing leopard habitat or movement was directed to be maintained; mining activity was stayed; further barbed-wire fencing and compartmentalisation were prohibited; and the Standard Operating Procedure placed before the Court was brought into immediate operation.

1.3. The Jawai Safari and Eco-Tourism Coordination Committee contemplated by the Standard Operating Procedure was directed to commence functioning. The SOP was made applicable to safari and eco-tourism activities throughout the Jawai landscape, irrespective of whether the land was forest land, revenue land, private land or community land.

1.4. Applications were thereafter filed by the Jawai Tourism and Conservation Society and by one Shri Rajendra Singh Ranawat seeking impleadment/intervention and consideration of the concerns of local residents, landholders and persons engaged in





tourism-related activities. Their written submissions and suggestions have been taken on record and their learned counsel have been heard.

2. The Jawai landscape is a mixed-use ecological region consisting of forest land, notified conservation reserves, revenue land, private holdings, community grazing land, granite hills, caves, water bodies and village settlements. The natural caves and rocky formations constitute resting, denning and breeding sites for leopards. The landscape is also characterised by the longstanding coexistence of wildlife with local pastoral and village communities.

2.1. The Jawai Leopard Conservation Reserves were constituted through notifications dated 27.02.2013 and 15.06.2018. The material placed by the State nevertheless indicates that leopard habitat and movement are not confined to the notified boundaries and extend into the surrounding revenue, community and privately held lands.

2.2. The State Government, by order No. F.3(10) Forest/2014 dated 31.03.2015, had already decided to regulate construction activity around the Critical Tiger Habitats of Ranthambhore and Sariska, Kumbhalgarh Wildlife Sanctuary and Jawai Leopard Conservation Reserve. The said order prohibits all new commercial activities, including hotels, and industrial activities, including mining, within one kilometre of the notified boundaries of the specified protected areas. It also prohibits conversion of land by the revenue authorities within the said one-kilometre zone.



2.3. In its reply, the Forest Department stated that a significant part of the leopard habitat, including caves and movement areas, is situated on revenue and private lands; that the NOCs issued by it were generally based upon distance from the nearest forest land or protected-area boundary; and that no comprehensive rule or policy presently regulated private-land construction by reference to actual wildlife movement. The State consequently acknowledged that a policy-level decision for protecting leopard caves and their vicinity was required.

2.4. The State further placed on record the SOP for regulating safari and eco-tourism activities. The SOP provides for mapping and categorisation of caves, site-specific approach distances for safari vehicles, prevention of vehicle congregation, registration and GPS monitoring of safari vehicles, prohibition of night safaris, baiting, artificial illumination and drones, regulation of dam-backwater activity, enforcement measures and periodic review.

2.5. The SOP, however, principally concerns safari and eco-tourism operations. It does not, by itself, contain a complete mechanism for scrutiny of land conversion, building plans, construction, expansion of tourism establishments or development upon private and revenue lands situated near leopard habitat. This aspect, therefore, requires an interim regulatory arrangement until a comprehensive policy is framed by the competent Government.

3. Learned counsel for the petitioner submitted that unregulated resort construction, commercial tourism, artificial illumination, vehicular congregation, hill cutting, fencing and human activity in



close proximity to leopard caves and foothills were causing fragmentation and disturbance of the habitat. It was urged that leopard caves, dens, breeding sites and corridors required scientific mapping and that construction activity within one kilometre thereof ought to be strictly controlled.

3.1. Learned counsel further submitted that permissions or NOCs granted merely with reference to revenue classification or distance from formally notified forest land failed to account for the ecological reality that leopards moved through and occupied private, revenue and community lands. It was accordingly urged that habitat sensitivity and wildlife movement should constitute mandatory considerations before any construction permission was granted.

4. Learned counsel appearing for the State submitted that the Forest Department had undertaken patrolling, cave monitoring, camera trapping, drone surveys, physical barriers near sensitive caves, registration-related measures and stakeholder consultations. It was submitted that the SOP had been prepared to establish a coordinated framework for regulating safari and eco-tourism activities.

4.1. Learned counsel drew attention to the Government order dated 31.03.2015 and submitted that commercial and industrial activities, including hotels and mining, as well as land conversion, were already prohibited within one kilometre of the notified boundaries of Jawai Leopard Conservation Reserve.



4.2. At the same time, it was stated in the reply that there was no comprehensive policy regulating construction on private land by reference to leopard movement, caves and other habitat features. The Forest Department also stated that protection of caves situated on revenue and private lands required a policy-level decision and inter-departmental coordination.

4.3. Learned Senior Counsel appearing for the Jawai Tourism and Conservation Society submitted that an undifferentiated prohibition covering the entire Jawai landscape would affect lawful village activity, existing permissions, local livelihoods and sustainable tourism. It was urged that construction should be regulated through scientifically identified zones and wildlife-friendly conditions rather than by a permanent blanket prohibition.

4.4. Reliance was placed upon **Vellore Citizens' Welfare Forum v. Union of India, (1996) 5 SCC 647**, and **In Re: Issue Relating to Definition of Aravali Hills and Ranges, 2025 INSC 1338**. The applicant proposed an absolute restriction up to 50 metres from identified caves or habitat, temporary structures between 50 and 100 metres and regulated construction beyond 100 metres. However, no site-specific scientific material establishing the ecological adequacy of these particular distances was placed on record.

4.5. Learned counsel appearing for Shri Rajendra Singh Ranawat supported protection of the hills, identified leopard caves, wetlands and wildlife-movement areas. He submitted that the cave-identification exercise should be comprehensive, transparent



and participatory and that lawful livelihood activities of local residents should be regulated in consultation with the local community.

5. Heard learned counsel for the parties and the applicants/intervenors and perused material available on record.

5.1. The questions requiring consideration are:

- (i) whether an indiscriminate prohibition on every kind of construction throughout the Jawai landscape is required to be continued indefinitely;
- (ii) how construction and land-use activity within one kilometre of protected-area boundaries and identified leopard habitat should be controlled pending formulation of a comprehensive policy; and
- (iii) what institutional and scientific framework should govern the field until such policy is notified.

6. Article 21 of the Constitution encompasses the right to a wholesome and ecologically balanced environment. Article 48A casts an obligation upon the State to protect and improve the environment and safeguard forests and wildlife, while Article 51A(g) recognizes the corresponding duty of every citizen to protect the natural environment and show compassion for living creatures.

6.1. The Wild Life (Protection) Act, 1972 does not contemplate protection of wildlife only when it remains within a formally notified boundary. The statutory protection afforded to Schedule-I species and the object underlying conservation reserves would be





substantially defeated if caves, breeding sites and movement corridors situated on revenue, community or private land were excluded merely because of the classification or ownership of the land.

6.2. The precautionary principle and the principle of sustainable development require preventive action where an activity presents a credible risk of serious or irreversible ecological injury. At the same time, regulation must distinguish between ecologically destructive commercial activity and the ordinary residential, agricultural and civic requirements of communities which have historically inhabited the landscape.

7. In ***In Re: T.N. Godavarman Thirumulpad v. Union of India, 2023 INSC 430***, the Hon'ble Supreme Court considered the earlier direction prescribing a uniform one-kilometre Eco-Sensitive Zone and prohibiting permanent structures therein. In paragraphs 51, 53 and 55, the Hon'ble Supreme Court observed:

"51. We are of the view that if such a direction is continued, rather than avoiding man-animal conflict, it will intensify the same. As observed in the said Guidelines, the requirement of declaring ESZs is not to hamper day to day activities of the citizens but is meant to protect the precious forests/Protected Areas from any negative impact, and to refine the environment around the Protected Areas."



"53. It is further to be noted that the NBWL, in its meeting dated 17th March 2005, has also recommended that the delineation of ESZs should project as regulation rather than prohibition of activities."

"55. ...The area to be declared as ESZ cannot be uniform and will be Protected Area specific. In some cases, it may be 10 kilometres on one side and 500 meters on the other side..."

7.1. The Hon'ble Supreme Court ultimately directed adherence to the categorization of prohibited, regulated and permissible activities under the applicable guidelines and ESZ notifications. At the same time, mining within a National Park or Wildlife Sanctuary and within one kilometre of its boundary was held to be impermissible.

8. In ***In Re: Issue Relating to Definition of Aravali Hills and Ranges, 2025 INSC 1338***, the Hon'ble Supreme Court emphasized geo-referenced ecological assessment for identifying areas requiring strict protection and areas where regulated activity could be considered. It observed that permitting further activity without examination by an expert body may not be in the interest of ecology and that such assessment would identify wildlife areas and other highly eco-sensitive areas requiring conservation.

8.1. The aforesaid decision arose in the context of mining in the Aravali Hills. It cannot be treated as authority for permitting construction or tourism activity in leopard habitat. The applicable



principle is that the long-term solution lies in scientific mapping, identification of inviolate areas, assessment of cumulative impact and regulated decision-making. Significantly, the Hon'ble Supreme Court restrained grant of new mining leases until completion of the expert management plan.

9. This Court also considers it appropriate to take note of relevant international scientific material concerning the effect of roads, settlements and human disturbance upon leopard habitat. Such material assumes significance not for prescribing an inflexible numerical prohibition, but for examining whether the distance of one kilometre bears a rational ecological nexus with the interim regulatory framework required for the Jawai landscape.

9.1. In this regard, a peer-reviewed study by Dusit Ngoprasert, Antony J. Lynam and George A. Gale, titled "*Human disturbance affects habitat use and behaviour of Asiatic leopard Panthera pardus in Kaeng Krachan National Park, Thailand*", published in *Oryx*, Vol. 41(3), pp. 343–351 (2007), is of particular relevance. The researchers employed camera traps at 72 locations and accumulated 4,493 camera-trap nights for examining leopard habitat use and behaviour in relation, inter alia, to roads, villages and human traffic.

9.1.1. Significantly, for analyzing the effect of distance, the researchers expressly divided the sampling locations into those situated "near (0–1 km) and far (>1 km)" from roads and villages. The statistical analysis recorded that "leopard RAI was higher far from villages" and also found significantly higher leopard habitat



farther from roads. **The study further recorded that leopards were detected 59% more frequently at locations where no human traffic was recorded and that leopard activity itself altered in response to human presence.**

9.1.2. The authors ultimately concluded that leopard habitat use and behaviour were affected by anthropogenic disturbance and recommended regulation of human access and conservation zoning separating areas of strict conservation from recreational and limited-use areas. Thus, the importance of the study for the present purpose is that the distinction between the first kilometre and the area beyond one kilometre was itself employed as an ecological variable in a field study specifically concerning *Panthera pardus*, and materially different patterns of habitat use were found in relation to roads, villages and human presence.

9.2. The ecological relevance of the first kilometre surrounding roads also finds support in the global study by Pierre L. Ibisich and others, titled "*A global map of roadless areas and their conservation status*", published in *Science*, Vol. 354, pp. 1423–1427 (2016). While assessing the fragmentation and ecological degradation associated with roads at the global scale, the researchers adopted "a 1-kilometer buffer to all roads" for identifying roadless areas. The study proceeds on the recognition that roads not only occupy physical space but also facilitate human penetration, fragmentation and degradation of adjoining ecosystems. Though this study is not leopard-specific, it lends



broader scientific support to treat the immediate one-kilometre road-influence zone as ecologically relevant rather than arbitrary.

9.3. A more recent leopard-specific study by Mengistu Muleta Gurmessa and others, titled *"Impacts of land use land cover change on Leopard (Panthera pardus) habitat suitability and its effects on human wildlife conflict in Hirkiso Forest, Sibru Sire District, Western Ethiopia"*, published in *All Earth*, Vol. 36(1) (2024), also evaluated road proximity as a determinant to leopard-habitat suitability. The researchers reported that "an area less than 1500 m away from the road was unsuitable habitat" for *Panthera pardus*, whereas habitat suitability increased with greater distance from roads. The study separately found that proximity to human settlements adversely affected leopard-habitat suitability. The precise ecological thresholds in different landscapes may naturally vary, but the study further reinforces the relationship between proximity to anthropogenic infrastructure and degradation of leopard habitat.

9.4. The aforesaid scientific material also finds reflection in international conservation practice. In its 2023 assessment concerning the Western Caucasus World Heritage property, the World Heritage Centre and IUCN expressed serious concern regarding road and tourism infrastructure situated "less than 1.5km from the property". The assessment specifically noted that the adjoining areas were important for habitat connectivity, which was "crucial for the ongoing reintroduction of the Persian leopard". It consequently recommended restraint upon large-scale



infrastructure and the halting of reported projects pending an Environmental Impact Assessment. **This material is not relied upon as prescribing a universal construction setback; its relevance lies in demonstrating that international conservation authorities have applied precautionary scrutiny to infrastructure in the immediate vicinity of landscape connectivity important for leopard conservation.**

9.5. These materials have to be understood with an important qualification. Neither the aforesaid studies nor the international conservation assessment establish a universal rule that every form of construction must permanently be prohibited within exactly one kilometre of every place where a leopard is sighted. Ecological response varies with terrain, nature and intensity of development, road traffic, settlement density, availability of water, breeding and denning activity, habitat connectivity and several other site-specific factors. A transient leopard sighting cannot, therefore, be equated with an active den, breeding site, high-use resting area or established movement corridor.

9.6. Nevertheless, the absence of a universally prescribed numerical prohibition does not render the distance of one kilometre scientifically irrelevant. **On the contrary, the leopard-specific study of Ngoprasert, Lynam and Gale expressly employed the 0–1 kilometre / beyond-one-kilometre distinction and demonstrated significantly different leopard habitat in relation to roads and villages.** The broader road-effect literature and subsequent leopard-habitat studies point in



the same direction. The international material, therefore, furnishes a rational scientific basis for treating one kilometre as a precautionary screening and regulatory distance, while leaving the final ecological boundary to a landscape-specific scientific assessment.

10. This Court further finds that neither the petitioner's proposal for an absolute and indiscriminate prohibition upon every construction within 1,000 metres, nor the applicant's proposal permitting regulated construction merely beyond 100 metres, can presently be accepted as the final ecological standard for the Jawai landscape. No comprehensive Jawai-specific ecological, carrying-capacity or cumulative-impact assessment establishing either distance as a permanent boundary has yet been placed before this Court.

10.1. At the same time, permitting unrestricted construction until completion of such scientific assessment carries an evident risk of irreversible alteration of leopard caves, cave-bearing hills, foothills, breeding and resting sites, water sources and movement corridors. The international scientific material referred to herein, read with the precautionary principle, the State Government's own order dated 31.03.2015 employing a one-kilometre regulatory zone and the admitted absence of a comprehensive policy for the Jawai landscape, persuades this Court that an aerial distance of one kilometre may appropriately operate, interim and subject to scientific revision, as a construction-control and mandatory



ecological-scrutiny zone around identified critical leopard-habitat features.

10.1.1 The said distance is, therefore, not being declared to be an immutable ecological boundary or a permanent no-construction radius. It is adopted as an interim, evidence-informed regulatory threshold until the State completes geo-referenced mapping, ecological and carrying-capacity assessment and frames a comprehensive policy capable of identifying areas requiring absolute protection and areas where regulated or permissible activity may appropriately be allowed.

11. Consequently, the writ petition is **disposed of** with the following directions:-

I. Area of operation :

These directions shall apply to the Jawai landscape comprising villages Kothar, Velar, Varaval, Lundara, Doodni, Choti Doodni, Rughnathpura, Mori, Mori Bera, Sena, Jeevda, Beesalpur, Balwana, Jawai Bandh Station and Perwa; the Jawai Leopard Conservation Reserves constituted vide notifications dated 27.02.2013 and 15.06.2018; and all caves, hills, foothills, wetlands, backwater areas, villages and corridors in District Pali identified by the Forest Department or to be identified/included by the State Government as forming part of Jawai Leopard Conservative Reserve, Leopard Habitat or movement.



II. **Government order dated 31.03.2015** :

The Government order No. F.3(10) Forest/2014 dated 31.03.2015 shall be strictly enforced. Accordingly, within one kilometre of the notified boundary of the Jawai Leopard Conservation Reserves:

- no new commercial activity, including hotel, resort, guesthouse, homestay, tourism camp or establishment of an identical nature, shall be sanctioned or commenced;
- no new industrial activity, including mining, shall be permitted; and
- no conversion of land shall be sanctioned by the revenue authorities.

No permission, licence, NOC, conversion order or building-plan approval contrary to the Government order dated 31.03.2015 shall confer any enforceable right.

III. **Protection of core ecological features** :

Irrespective of land ownership or revenue classification, no new construction, hill cutting, blasting, excavation, road or track formation, boundary wall, commercial structure or material alteration of land shall be permitted upon:

- a hill or rocky formation containing an identified leopard cave or den;
- the foothill integrally connected with such cave or den;
- an identified breeding, maternal, resting or high-use leopard site;



- a mapped wildlife-movement corridor or natural access route to a cave, den or water source;
- a wetland, dam-backwater nesting area or other site identified as ecologically inviolate; or
- any site where the activity would block, fragment or materially disturb leopard movement or habitat.

IV. **One-kilometre Leopard Habitat Construction-Control Zone** :

An aerial distance of one kilometre, measured horizontally from the outer edge of every provisionally or finally mapped leopard cave, den, breeding site, high-use resting site, hill-foot habitat, corridor or other critical habitat feature, shall operate as the Leopard Habitat Construction-Control Zone.

The said zone shall be one of the mandatory ecological scrutiny and shall operate as prohibition upon every commercial, residential or civic structure within the said zone.

- no proposal involving blasting, hill cutting, obstruction of a corridor, high-intensity illumination, amplified outdoor sound, extraction affecting a water source or discharge of untreated waste shall be recommended.

V. **Village and essential activities** :

The following activities shall not be treated as prohibited merely because they fall within the One-kilometre Leopard Habitat Construction-Control Zone:



Bona fide residential construction within an existing village abadi area;

- Repair or reconstruction of an existing lawful residential structure without material expansion towards a protected ecological feature;
- Schools, Anganwadis, dispensaries, drinking-water facilities and other essential public utilities;
- Traditional agriculture, grazing and other customary livelihood activities not involving fragmentation or permanent obstruction of wildlife movement; and
- Conservation, rescue, habitat-restoration and forest-protection structures undertaken by competent authorities.

Such activity shall nevertheless require all permissions prescribed by law and shall comply with wildlife-friendly conditions concerning lighting, noise, waste, access, fencing and movement corridors. Where a proposal materially enlarges the existing footprint or lies near an identified cave, den, breeding site or corridor, prior appraisal under these directions shall be mandatory.

VI. **Existing and ongoing construction** :

Any existing structure within the prohibited area of One-kilometre Leopard Habitat Construction-Control Zone shall be continued to lawfully operate while maintaining the norms of SOP and this order, but no fresh addition, alteration or expansion shall be permitted.





All pending applications for conversion, building-plan approval or expansion within the said zone stand disposed of in accordance with this order.

VII. **Mapping and disclosure** :

The Deputy Conservator of Forests, Pali, in coordination with the Revenue Department and other members of the JSECC, shall prepare a provisional geo-referenced map within eight weeks identifying:

- Known leopard caves and dens;
- Breeding, maternal and high-use resting sites;
- Cave-bearing hills and connected foothills;
- Wildlife-movement corridors and crossing points;
- Wetlands, dam-backwater nesting sites and water sources;
- and
- Existing settlements, roads and commercial tourism clusters.

Existing Forest Department records, camera-trap data, field surveys, local ecological knowledge and the cave inventory appended to the SOP shall be considered. The provisional map shall be published on the websites of the District Collector, Pali, and the Forest Department and displayed at the concerned Gram Panchayats.

Publication of the provisional map shall not prevent the Forest Department from protecting an additional cave, den, corridor or habitat feature subsequently discovered. Any addition or alteration shall be supported by a brief field report and placed in the public domain.





VIII. **SOP and tourism regulation** :

The Standard Operating Procedure placed before this Court shall continue to operate throughout the Jawai landscape on forest, revenue, community and private lands in relation to safari, wildlife-viewing and eco-tourism activities.

The SOP shall be conclusive in respect of every matter governed by it. In particular, it shall govern:

“ **CONTENTS**

CHAPTER I LANDSCAPE OVERVIEW AND CONSERVATION
IMPERATIVES

- 1.1 LOCATION, CONSTITUTION AND EXTENT
- 1.2 BACKGROUND INFORMATION AND ATTRIBUTES
- 1.3 GENESIS OF TOURISM IN JAWAI
- 1.4 CURRENT STATUS OF TOURISM IN JAWAI
- 1.5 NEED FOR A STANDARD OPERATING PROCEDURE
- 1.6 PURPOSE, OBJECTIVES, AND ECOLOGICAL BASIS

CHAPTER II STATUTORY BASIS AND ADMINISTRATIVE
FRAMEWORK

- 2.1 DEFINITIONS
- 2.2 APPLICABILITY AND SCOPE
- 2.3 LEGAL AND ADMINISTRATIVE CONTEXT
- 2.4 GOVERNANCE AND INSTITUTIONAL FRAMEWORK

CHAPTER III SAFARI REGULATION AND ECOLOGICAL
SAFEGUARDS

- 3.1 ADMINISTRATIVE CLUSTERS (LANDSCAPE MONITORING
UNITS)



3.2 CAVE AND HABITAT PROTECTION PROTOCOL

3.3 VEHICLE REGISTRATION, OPERATOR ELIGIBILITY, AND
GPS MONITORING FRAMEWORK

3.4 SAFARI TIMINGS, OPERATING WINDOW, AND ABSOLUTE
PROHIBITIONS

3.5 TOURIST BEHAVIOUR GUIDELINES

CHAPTER IV COMPLIANCE, ENFORCEMENT, AND ADAPTIVE
GOVERNANCE

4.1 INSTITUTIONAL ROLES AND DEPARTMENT-WISE
RESPONSIBILITY FRAMEWORK

4.2 ENFORCEMENT POWERS AND PREVENTIVE AUTHORITY

4.3 VIOLATIONS AND PENALTY FRAMEWORK

4.4 UNDERTAKING AND RENEWAL MECHANISM

4.5 IMPLEMENTATION TIMELINE AND PHASED
STRENGTHENING

4.6 REVIEW, AMENDMENT, AND ADAPTIVE MANAGEMENT

ANNEXURE I ADMINISTRATIVE CLUSTERS OF THE JAWAI
LANDSCAPE

ANNEXURE II CAVES OF JAWAI LANDSCAPE”

Accordingly, the matters covered under the aforesaid Chapters and Annexures, including administrative clusters, cave and habitat protection, vehicle and operator registration, GPS monitoring, safari routes and timings, visitor conduct, enforcement, penalties, review and adaptive management, shall be dealt with strictly under the SOP by the competent authorities identified therein. These directions shall neither displace nor dilute the SOP, and no permission shall be granted contrary to it.





The prohibition on night safaris, baiting, spotlights, flashlights, drones, blocking of wildlife movement, unauthorized entry into no-go areas and congregation of vehicles near caves shall be strictly enforced. Safari vehicles and operators shall be registered and GPS-enabled in accordance with the SOP. The Forest Department may enlarge the prescribed vehicle-approach distance from a cave whenever field observations, maternal activity, cub presence or behavioural stress so require.

No tourism establishment shall advertise or operate on the premise of guaranteed leopard sighting from rooms, camps or private premises, or undertake feeding, baiting, lighting or habitat alteration to attract wildlife.

IX. Mining, fencing and fragmentation :

No mining activity shall be permitted within the notified conservation reserves, within one kilometre of their boundaries, or upon any identified cave-bearing hill, foothill, corridor, wetland or other core leopard habitat.

The restraint upon new mining activity in the Jawai landscape contained in the order dated 28.04.2026 shall continue.

No new barbed-wire fencing, solid wall or compartmentalization obstructing wildlife movement shall be erected in an identified corridor or habitat area. Existing fencing shown to obstruct a recognized movement path shall, after notice to the landholder, be removed or suitably modified by adopting wildlife-friendly alternatives.



X. **Implementation and remedies** :

The District Collector, Pali, and the Deputy Conservator of Forests, Pali, shall be responsible for inter-departmental implementation of these directions.

Any person aggrieved by a decision on a construction or land-use proposal may avail the statutory remedy, if available. In the absence of such remedy, a representation may be made to the JSECC, which shall decide it by a reasoned order after obtaining the record from the concerned authorities.

11.1. The SOP, in respect of the matters governed by it, and these directions, in respect of construction, land conversion, land use and other matters not governed by the SOP, shall hold the field and remain operative. No authority shall grant any permission or take any action inconsistent with the SOP or these directions.

12. The interim orders dated 23.03.2026, 20.04.2026 and 28.04.2026 shall merge into this final order. To the extent of any inconsistency concerning construction permissions, the framework contained herein shall prevail. The directions concerning protection of habitat, prohibition of night safari and artificial wildlife spotting, mining, barbed-wire fencing, wildlife corridors and implementation of the SOP shall continue in the terms specified above.

13. APPLW Nos. 01/2026, 02/2026, 63/2026 and 83/2026, being applications for impleadment/intervention, are disposed of by permitting the applicants to participate as intervenors and by taking their pleadings, documents, submissions and suggestions



on record. In view of final disposal of the writ petition, formal impleadment is not required. Individual permissions shall be examined in accordance with the framework prescribed herein.

14. The application for interim relief does not survive in view of the final directions and is accordingly rendered infructuous. No other application remains pending.

15. A copy of this judgment, for the necessary compliance, shall be forwarded to all the respondents herein as well as the Chief Secretary, Government of Rajasthan, Jaipur.

16. All pending applications also stand disposed of.

(REKHA BORANA),J

(DR.PUSHPENDRA SINGH BHATI),J

35/Skant