

SKV Law Offices Secures Favourable Supreme Court Decision on Great Indian Bustard Conservation: ACME's Renewable Energy Projects Cleared for Operation in Rajasthan



Bringing much-needed clarity and certainty for renewable energy development in ecologically sensitive regions, SKV Law Offices successfully represented ACME Cleantech Solutions Pvt. Ltd. before the Supreme Court of India in the landmark Great Indian Bustard (GIB) conservation case, i.e., W.P. No. 838 of 2019 titled 'Dr M.K. Ranjitsinh & Ors. v. Union of India & Ors.' The decision, delivered on 19.12.2025, upheld arguments advanced by ACME regarding the feasibility of large-scale solar and battery storage projects outside designated conservation revised priority areas.

The case involved balancing two critical national imperatives, namely preserving the critically endangered GIB, with fewer than 125 birds remaining in Rajasthan, and India's ambitious renewable energy goals. The Supreme Court, recognising this genuine tension, appointed a nine-member expert committee comprising leading conservationists and energy regulators to develop nuanced, site-specific solutions rather than blanket prohibitions.

SKV Law Offices advanced the position that a broader expansion of conservation-restricted areas beyond what has been recommended in the Second Committee Report would cripple renewable energy development without any meaningful enhancement

in the protection of the species. ACME's 1,200 MW Battery Energy Storage System project in Rajasthan, along with its 1,000 MW and 400 MW solar projects in Fatehgarh-II and Bramer-I respectively, all operate in areas where GIB sightings are sparse and existing transmission infrastructure is already dense.

The critical and contentious issue raised before the Court on behalf of ACME concerned the extent of the revised GIB priority area in Rajasthan. While the majority of the Expert Committee recommended a revised priority area of approximately 14,013 sq. km (i.e., addition of only 850 sq. km.), a dissenting note by Dr Devesh Gadvi sought the inclusion of an additional 657 sq. km, which was an expansion that would have had severe and irreversible consequences for ongoing and future renewable energy projects, including ACME's 1200 MW large-scale solar and BESS project development.

SKV Law Offices, acting for ACME, mounted a focused and evidence-driven challenge to this proposed expansion. The firm demonstrated that:

The majority members of the Second committee report had already undertaken a holistic scientific and stakeholder-based assessment, concluding that 14,013 sq. km was adequate for effective GIB

conservation. The dissenting recommendation lacked cogent reasoning and ignored low GIB sightings, existing dense powerline infrastructure, and the exceptionally high renewable energy potential of the proposed additional area.

Accepting the framework advanced by SKV Law Offices, the Supreme Court categorically declined to include the additional area suggested in the dissenting note. The Court restricted the revised priority area in Rajasthan to approximately 14,013 sq. km, thereby rejecting the proposed expansion that would have imposed sweeping and disproportionate restrictions on renewable energy projects.

This clarification brings tangible benefits such as: (i) developers can now plan with defined parameters, (ii) transmission utilities can finalise routes, and (iii) project sponsors can secure financing based on predictable approval timelines.

The Supreme Court endorsed a tiered approach that distinguishes between high-priority conservation zones and development-compatible areas. Notably, within the 14,013 square kilometre revised priority area in Rajasthan, stringent restrictions apply: no new wind turbines, no solar installations exceeding 2 MW, and mandatory mitigation of existing transmission lines through undergrounding or rerouting. Outside this zone, developers face reasonable requirements, which include optimised transmission routing and coordination with state forest authorities, but retain practical project viability. This framework acknowledges that both species conservation and renewable energy are non-negotiable national priorities and that neither must be sacrificed at the cost of the other.

The judgment directs completion of all mitigation measures and appoints the Inspector General of the Wildlife Division to oversee implementation. This creates genuine operational certainty for both conservation and energy infrastructure objectives. Developers can now plan transmission line layouts, secure land rights, and structure project financing.

The decision establishes an important precedent for renewable energy development across India's ecologically sensitive geographies. It demonstrates that principled environmental advocacy, rooted in scientific evidence, technical feasibility, and genuine engagement with conservation objectives, achieves better outcomes than litigation-driven resistance to environmental safeguards. For companies evaluating projects in wildlife-sensitive zones, the judgment signals that working collaboratively with conservation bodies and accepting site-appropriate mitigation

measures provides a sustainable and legally defensible development pathway.

SKV Law Offices' representation of ACME Cleantech reflected a sophisticated understanding of the policy challenge underlying the litigation. Rather than arguing for weak environmental standards, the firm's submissions acknowledged the urgency of GIB conservation while contending that achieving conservation goals did not require foreclosing India's renewable energy future. This nuanced positioning, defending renewable energy development within genuinely protective conservation frameworks, distinguished ACME's advocacy.

Pertinently, the judgment brings closure to a protracted legal battle spanning multiple years, expert evaluations, and overlapping environmental and infrastructure concerns. It provides much-needed regulatory certainty to renewable energy developers while preserving robust conservation measures for the GIB within a scientifically justified priority area.

Click [here](#) to read the judgment.

ACME Cleantech Solutions Pvt. Ltd. was represented before the Supreme Court of India by Shri Venkatesh (Founding Partner), Shryeshth Ramesh Sharma (Senior Partner), Priya Dhankhar (Counsel), Manav Bhatia (Associate) and Drishti Rathi (Associate) of the SKV Law Offices team.