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URBAN CLEANLINESS IN INDIA: A LEGAL AND SOCIOLOGICAL CONTEXT

This short article is written by Abhirath Narasimhan of RV University, School of Law.

Abstract

Littering and improper Waste Management are a major problem in India. The paper performs a comparative analysis between the cities of Indore and Bengaluru. Bengaluru struggles with poor waste management despite having strict penalties while Indore is one of the cleanest cities in India in addition to having strict penalties. Using this analysis, combining sociological theory and realist jurisprudence it is concluded that imposition of stricter penalties and conducting awareness campaigns cannot bring change. Civic Pride and Durkheim's Organic Solidarity are central concepts in decoding the problem of littering. Culture and household values are critical in shaping public attitude. Karl Llewellyn's realist view that law must consider lived realities and social behavior, not just exist on paper is essential in demystifying the stubborn habit of poor waste management. For lasting impact, the state must act not as an enforcer, but as a leader.

Key words: Solidarity, Pride, Culture, Cleanliness, Realist

Introduction

For long has India suffered from the bane of littering and the unchanging attitudes of the masses towards our environment. I have observed that the dominant attitude towards our environment is “To clean the areas far away from our homes is the responsibility of the Government.” And this statement translates quite well into reality. Residents only keep their home and surrounding areas clean. But a huge pile of garbage that is far away and hidden from their vision becomes something that is not their concern.¹ Any attempt to spread awareness is seen by many people as preaching and interfering in someone else’s business as seen in an incident where someone who objected to tourists throwing trash from their car on the street was told- “It is not your business. Mind your business.”² Even our courts, which we ironically call “Temples of Justice” are infected with this plague of unhygienic behavior. For instance, the City Civil Court complex and Chief Judicial Magistrates Court complex in Bengaluru have plastic bottles, wrappers, food, etc. thrown on the floor both outside and inside the building. The washrooms of almost every government-maintained area are choked with waste.³

At the root of the problem lies the law and lawmakers. Laws increasingly prioritize ‘deterrence’ as a mechanism to prevent littering.⁴ The ‘deterrence’ theory of punishment has deep flaws that have left the country’s enlightened disappointed. The colonial legacy caused laws to lead to a ‘show of might’ by the Government rather than enhancing proper use of the power.⁵ I posit that

¹ Times News Network, *Lakes, Schools, Streets—All Choked by Waste at Tambaram*, TIMES OF INDIA (CHENNAI)(June 5, 2025), <https://timesofindia.indiatimes.com/city/chennai/lakes-schools-streets-all-choked-by-waste-at-tambaram/articleshow/121631165.cms>.

² Nootan Sharma, *Tourists Keep Their Cars Clean, Use Hills as Dustbins. Can Anyone Say “Atithi Devo Bhava”?*, THE PRINT (Dec. 22, 2024), <https://theprint.in/opinion/tourists-keep-their-cars-clean-use-hills-as-dustbins-can-anyone-say-atithi-devo-bhava/2414466/>.

³ Jitendra Choubey, *Most People Say Public Toilets under Swachh Mission in Bad State: Survey*, THE NEW INDIAN EXPRESS (Oct. 2, 2023), <https://www.newindianexpress.com/nation/2023/Oct/02/most-people-say-public-toilets-under-swachh-mission-in-bad-state-survey-2620095.html>.

⁴ Sajjid Mitha, *India Imposes an Environmental Compensation Penalty on Violators of the Plastic Waste Management Rules*, POLYMERUPDATE (Aug. 26, 2024), <https://www.polymerupdate.com/News/Details/1332360>.

⁵ Amrit Dhillon, *India to Revise Colonial-Era Penal Code and Toughen Laws Protecting Women*, THE GUARDIAN (Aug. 13, 2023), <https://www.theguardian.com/world/2023/aug/14/india-laws-protecting-women-review-penal-code>.

the solution to littering lies in the transformation of societal consciousness using a strong legal foundation that departs from colonial and/or traditional thinking.

Legal Attitude Towards Public Hygiene and The Environment

An article from the New Indian Express⁶ is importantly titled ‘Law and awareness are the only way to keep public places clean.’ Unfortunately, this is the dominant narrative. This article in its concluding paragraph states that ‘aggressive awareness programs’ and ‘stringent penalties’ are necessary to ‘deter people from littering.’ It notably says that this is the only option. Law has perfectly put this idea into practice through hyperfocus on penalty. The Environment (Protection) Act, 1986⁷ provides an overarching framework for Central and State Governments to make rules for environmental protection. Its enactment is consistent with Constitutional ideals enshrined in Article 48A “The state shall endeavor to protect and improve the environment and to safeguard the forests and wildlife of the country.”⁸ and Article 51A(g) “It shall be the duty of every citizen of India... to protect and improve the natural environment including forests, lakes, rivers and wildlife, and to have compassion for living creatures.”⁹. The Act stipulates a fine of one lakh rupees and/or imprisonment which may extend to five years for violating provisions of the Act or rules made under the Act¹⁰. The hon’ble Supreme Court of India in M.K Ranjitsinh v. Union of India¹¹, while talking about the State’s obligations towards Citizens of India and the environment mentioned that Citizens have the right to a Clean and Healthy Environment including an environment that is free from the adverse effects of Climate Change. However, how well these idealistic declarations of rights are being implemented is worth looking into.

We shall consider the cities of Bengaluru and Indore. In Bengaluru, Bruhat Bengaluru Mahanagara Palike, the city’s municipal body, has used this Act and the Solid Waste

⁶ *Law and Awareness Only Ways to Keep Public Places Clean*, THE NEW INDIAN EXPRESS (Nov. 17, 2023), <https://www.newindianexpress.com/opinions/editorials/2023/Nov/17/law-and-awareness-only-ways-to-keep-public-spaces-clean-2633523.html>.

⁷ The Environment (Protection) Act, 1986, § 15, No. 29 Acts of Parliament, 1986 (India), <https://www.indiacode.nic.in/handle/123456789/4318>.

⁸ INDIA CONST. art. 48A.

⁹ INDIA CONST. art. 51A, cl. (g).

¹⁰ The Environment (Protection) Act, 1986, § 15, GAZETTE OF INDIA, Extraordinary, Part II, Sec. 1, No. 29 of 1986 (May 23, 1986), https://www.indiacode.nic.in/bitstream/123456789/6196/1/the_environment_protection_act%2C1986.pdf.

¹¹ M.K. Ranjitsinh v. Union of India, (2024) 4 SCC 341.

Management Rules, 2016¹² to promulgate byelaws which impose heavy fines for littering and additional penalties for repeated offences.¹³ Indore has similar strict penalties for improper disposal and handling of waste and it has been declared the cleanest city in India eight times¹⁴ and Bengaluru does not come close. If the Article initially spoken of in this part is correct to say ‘aggressive awareness programs’ and ‘stringent penalties’ are the ‘only’ solution, then what is going wrong in Bangalore? It is surely unwise or I daresay- lazy to blame it on population difference. The next part will discuss what steps Indore took to achieve its extraordinary condition of cleanliness, the current status of Bengaluru’s policies and their impact.

Indore’s Transformation and The Dream for a Clean Bengaluru

An Article in ‘The Guardian’¹⁵ authored by Amrit Dhillon provides critical insights behind Indore’s transformation. It has implications that the primary reason for change in Indore’s social conscience is not just campaigns but encouragement or a rise in ‘civic pride’ as Mr. Dhillon says in this Article. He mentions that the tune played by the garbage truck is ‘Indore Has Become Number One’. Segregation of waste at households, presence of multiple categories of dustbins in vegetable markets, vehicles stopping to collect trash on the streets, strong emphasis on recycling waste, school children being asked to take oaths to keep the city clean, etc. indicated in this article point towards not just legal change and awareness, but active encouragement. Encouragement in the Oxford’s Learner Dictionary is defined as ‘the act of encouraging someone to do something; something that encourages someone’¹⁶ and encouraging as ‘that gives somebody support, courage or hope’.¹⁷ Indore did this not just verbally but through incentive. Mr. Dhillon’s Article also mentions that the people were motivated by the prestige or honor that

¹² Solid Waste Management Rules, 2016, S.O. 1357(E) (Apr. 8, 2016), GAZETTE OF INDIA, Extraordinary, Part II, Sec. 3, Sub-sec. (ii), https://cpcb.nic.in/uploads/MSW/SWM_2016.pdf

¹³ Chiranjeevi Kulkarni, *Pay Rs 1,000 for Peeing in Public in Bengaluru*, DECCAN HERALD (Jan. 15, 2020), <https://www.deccanherald.com/india/karnataka/bengaluru/pay-rs-1000-for-peeing-in-public-in-bengaluru-794990.html>.

¹⁴ Shailaja Chandra, *How Does Indore Do It? A Look at the Strategy That Won It the Cleanest City in India Award for 7 Years in a Row*, FRONTLINE (Jan. 13, 2024), <https://frontline.thehindu.com/the-nation/how-does-indore-do-it-india-cleanest-city-7-years-in-a-row-strategy/article67737621.ece>.

¹⁵ Amrit Dhillon, “*I’ve Seen People Stop Their Cars to Pick Up Litter*”: How One City Cleaned Up Its Streets, THE GUARDIAN (Apr. 4, 2025), <https://www.theguardian.com/environment/2025/apr/04/how-indian-city-indore-beat-the-rubbish>.

¹⁶ Encouragement, OXFORD LEARNER’S DICTIONARIES (Oxford Univ. Press 2025), <https://www.oxfordlearnersdictionaries.com/definition/english/encouragement>.

¹⁷ Encouraging, OXFORD LEARNER’S DICTIONARIES (Oxford Univ. Press 2025), <https://www.oxfordlearnersdictionaries.com/definition/english/encouraging>.

comes with winning an award for cleanliness and government policy played a crucial role in igniting the desire in people to collectively ensure the city is clean. It is also worth mentioning that such a feat requires action across classes. Meaning from the economically weaker sections to the middle class and the rich, all would have to come together. Something must have had to bind them all together and ‘civic pride’ is the key.

It is the absence of this strong sense of civic pride in Bengaluru that renders the law useless. As mentioned in the introduction, the threat of penalty is excessively used in most Indian cities. Indore did not just threaten penalty but there was a spark of change in social consciousness that effectively allowed the functioning of regulations. It might now be argued that even without the presence of regulations, the residents of Indore may end up continuing the cleanliness frenzy. This reflects something that many sociologists agree with- The only meaningful law comes directly from society. Cleanliness now exists in the Indore residents’ collective conscience.

Bengaluru, as many know, was called the Garden City of India before rapid and uncontrolled urbanization destroyed the city’s civic sense and cleanliness.¹⁸ Policy of the municipal corporation is markedly different from Indore. It has focused on establishing a surveillance system- by reportedly adding cameras to garbage collecting vehicles to ensure that employees work and enforce stricter penalties.¹⁹ Encouragement that drives societal change has not truly happened in Bangalore and this position is reinforced by an incident wherein minimal participation was reported in a cleanliness drive and those who attempted to attend were barely able to because of poor information dissemination on part of the organizers.²⁰ All of it screams lack of encouragement. There is an overwhelming amount of ‘It is never going to change’ attitude in officials and the people. Corruption is another massive issue. Bengaluru’s population is not able to act collectively as each class sees the city differently. The poor see no incentive in keeping the city clean and those with wealth do not bother because they see only their residence as theirs. What makes Bengaluru’s population tolerant of pollution, bad roads, horrible public

¹⁸ AFP, *Bengaluru: How India’s “Garden City” Became Garbage City*, HINDUSTAN TIMES (Jan. 27, 2017), <https://www.hindustantimes.com/india-news/bengaluru-how-india-s-garden-city-became-garbage-city/story-wkY96bgDnWx6gCWphczRMM.html>.

¹⁹ Id.

²⁰ Hamsaveni N., *Poor Citizen Participation Marks Start of Bengaluru’s 10-Day Cleaning Drive*, TIMES OF INDIA (Apr. 21, 2025), <https://timesofindia.indiatimes.com/city/bengaluru/poor-citizen-participation-marks-start-of-bengalurus-10-day-cleaning-drive/articleshow/120493264.cms>.

restrooms? What makes the law concerning waste management pointless in Bengaluru and effective in Indore? The answer lies in sociological and jurisprudential analysis.

The Social Mind

Waste Management requires collective action. It is impossible for it to be made the sole responsibility of a governmental body to ensure public hygiene. If the mindset of the society does not change, it is meaningless for one part of it (the government) to try and fix anything. This is because it forms a kind of sabotaging friction. A large portion of the society being uncooperative and a small portion repeatedly ‘fixing’ the mess. But in Bangalore, neither the municipality nor broader society seems dedicated. Dedication does not arise in a spontaneous fashion; it takes incentive which Bangalore’s population has not been given. Looking at piles of garbage has become normal because it exists in the social mind of the city that these piles are not a problem. What I mean by ‘Social Mind’ is the totality of attitudes, rules, memory, knowledge, etc. held by majority of a society that makes a pattern of behavior possible. For example, international trade is possible because rules, memory and knowledge are embedded in the social mind of the world allowing many people to facilitate exchange of goods and services. The social mind in Indore compels drivers to get off their vehicle and pick up any garbage they see on the streets. There is a vision of a city in this mind and any deviation from this vision is deemed unacceptable in the eyes of Indore’s populace. In the case of Bangalore and a boatload of other cities in India and the World, this vision is lacking, the location of civic pride is elsewhere or absent. Pop culture and rabid capitalism have led Bangalore’s youth to see the city as a destination of ‘fun’ so what is truly taken care of is 1) Employment and 2) Areas of banter, dancing, drinking, etc. I do not argue that people do not want, or do not ask for cleanliness. This demand has been there in Bengaluru for decades. Most want cleanliness but they are not expressing interest in working for it. I can identify three reasons, one is preoccupation with employment, secondly is lack of hope that collective action is possible in the city, finally and arguably most importantly is that locus of civic pride is elsewhere than in maintaining clean public areas. To see a clean and green Bangalore is therefore only a dream. If the enlightened ones in Bangalore want to see change, the locus of civic pride in Bangalore must change.

Solidarity

Emile Durkheim, a celebrated sociologist, discussed the impact of division of labor on social order and cohesion. Durkheim asked what it is that holds people together and responded that it is the body of beliefs/sentiments held by commonfolk. This idea is rooted in the degree of interdependence and interaction people have on and with each other respectively. Solidarity depended on this interaction/interdependence.²¹

The type of solidarity relevant here is organic solidarity. Organic solidarity is dominant in the modern capitalist order. Durkheim called it ‘Organic’ likely because in an organ system each individual has a different function and relies on another organ for functioning. This is projected onto society where each person has a specific role and skills and depends on others for achieving certain goals.²² This kind of solidarity arose with the rise of individual rights and capitalism. An Engineer must depend on a lawyer for defending them in court in case of disputes. It is also noteworthy that ancient society was far less complicated. What we notice in cities like Bangalore is that they function in an ultra-organic way. What I mean by ultra-organic is that while individuals depend on each other for fulfillment of goals, they are indifferent to the needs and struggles of each other. A corporate employee is unlikely to bother about a street vendor though the street vendor may be providing goods or services to the employee.

How is this connected to waste management or littering? It was stated earlier that it requires collective action to achieve what Indore has. Indore has fostered a kind of organic solidarity that does not isolate social actors. Bengaluru has clearly fallen short of fostering this wholesome organic solidarity. The toxic and isolationist nature of organic solidarity in cities where capitalism has spread uncontrollably prevents people across all classes from coming together for a common cause. Each social actor sees only their own interest. This is manifested in the form of attitudes in social mind like “There is no need to worry about cleanliness outside our home” and “It is not anyone else’s business how I manage waste.”

²¹ S.B. Cake & J.E. Pederson, Kinship Like I’ve Never Experienced Before: Modern Mechanical Solidarity on the Appalachian Trail Network, *Soc. Sci. & HUMAN. OPEN* (Apr. 9, 2024), <https://ssrn.com/abstract=4788386>.

²² Id.

Culture, Household and Education

A person who witnessed another spitting *gutka* within temple premises was infuriated and fiercely reprimanded the spitter. But when the same was observed to be done on the streets, only mild discomfort at the act was expressed by him. This is likely because the religious values instilled in this person by his family, within the household, treats temples as places of such sanctity that no form of dirtiness is allowed within it. But this typical family will not stress nearly enough about keeping the streets, parks, forests or rivers clean. Culture given to the child in the household depends mainly on caretakers of the children be it the parents or someone else. If the education system does not focus on changing the locus of civic pride or undoing what rabid capitalism has done, the vicious cycle of not incorporating cleanliness within the culture imparted by the household will never change. A child learns a lot in the household before going to any educational institution.²³ Sociologists use the term socialization to refer to how people inherit behaviors from their immediate surroundings.²⁴ In the example of spitting in a holy place like a temple, a child/person witnessing the reprimand will take this as a lesson and when this person witnesses no reprimand being offered to those who spit on the streets, they take it as a norm and inherit it. Thus, for any meaningful change in attitudes towards public hygiene, the education system must destroy this cycle of inheriting flaws. This is exactly what Indore did.

The Japanese are a perfect example of how culture and socialization mold people into treating their environment in a responsible manner. Cleanliness is unshakably seated in Zen Buddhist principles, Shintoism. It is not seen as a chore but a duty. Thus, cleanliness becomes a norm²⁵ and the same attitude is inherited by children.

Realist Jurisprudence and its Link to Legal Reform

Law is increasingly viewed as a directive written on a paper, passed by competent authority which ought to be followed. Llewellyn is a legal scholar from the American Realist School of Jurisprudence, and he rightly argues that the real-life implementation of the law differs

²³ S.L. Della Porta, P. Sukmantari, N. Howe, F. Farhat & H.S. Ross, *Naturalistic Parent Teaching in the Home Environment During Early Childhood*, FRONTIERS IN PSYCHOLOGY, 13:810400 (2022), <https://doi.org/10.3389/fpsyg.2022.810400>.

²⁴ *Socialization*, ENCYCLOPÆDIA BRITANNICA (202 ed.), <https://www.britannica.com/science/socialization>.

²⁵ *Cleanliness in Japan: Its Roots and Modern Struggles*, JAPANETIC (June 2, 2024), <https://newsletter.japanetic.com/p/cleanliness-in-japan>.

significantly from what lawmakers create.²⁶ Llewellyn states that the entirety of the social world can potentially be placed under the category of 'law'.²⁷ This clearly explains the transformation of Indore. More than the iron fist of law, the flow of social change allowed cleanliness to penetrate the social mind of the city. If traditional definition of law tied to colonial enforcement is used, then it shall be to no avail.

Conclusion

Continued dominance of prevailing legal reasoning on urban cleanliness would not address issues in cities like Bengaluru or Mumbai. The willingness to change, i.e., an acknowledgement that law is improper is the first step in understanding what needs to be done. A widely known principle in academia is that when knowledge is not examined, the flaws are carried forward and seep deeper into institutions, shaping them and becoming an integral part of rules and understanding. A change from simplistic to critical approach is the way forward for cities facing problems of littering and waste management. Law must be viewed through a broad lens rather than continuing the colonial attempt to drive change through force. Acknowledging the significance of the power that society has over making legal goals a reality is key in allowing change. No amount of imposing hefty fines or half-hearted awareness campaigns is going to fix the problem of waste in Bengaluru and other cities. The intention is not to demean or insult any city but to analyze critically, framing problems and solutions theoretically. Focus must shift towards how society impacts law and not merely how a show of force by the state may drive change. Showing force may cause temporary change but for lasting impact, society as a whole must be considered in policy decisions. Speaking broadly, scholarship must continue to analyze whether knowledge is truly evolving, or flawed structures are simply being replicated.

Littering must not be seen as a law-and-order issue but a cultural and systemic issue. A lesson cannot be 'beaten into the heads' of the people. Law reinforces most effectively what is already within a society's culture and thus, the focus must be on culture. For this, the state must take along with itself the population in combatting societal menaces like littering. Rather than acting

²⁶ Bill Clune, *Law in Action and Law on the Books: A Primer*, NEW LEGAL REALISM (June 12, 2013), <https://newlegalrealism.org/2013/06/12/law-in-action-and-law-on-the-books-a-primer/>.

²⁷ David R. Papke, *Influential Articles: Llewellyn's Law-in-Action*, MARQ. U. L. SCH. FACULTY BLOG (Mar. 13, 2009), <https://law.marquette.edu/facultyblog/2009/03/influential-articles-llewellyn's-law-in-action/>.

as a ruler or governor, it must act as a leader, moving with the people and not in front of the people.

Reference List

A. Case Law

1. *M.K. Ranjitsinh v. Union of India*, (2024) 4 SCC 341 (India).

B. Constitutions, Statutes and Rules

1. INDIA CONST. art. 48A, 51A.

2. The Environment (Protection) Act, No. 29 of 1986, 15, GAZETTE OF INDIA, Extraordinary, Part II, Sec. 1 (May 23, 1986), https://www.indiacode.nic.in/bitstream/123456789/6196/1/the_environment_protection_act%2C1986.pdf

3. Solid Waste Management Rules, 2016, S.O. 1357(E) (Apr. 8, 2016), GAZETTE OF INDIA, Extraordinary, Part II, Sec. 3, Sub-sec. (ii), https://cpcb.nic.in/uploads/MSW/SWM_2016.pdf

C. Journal Articles and Websites

1. Cake, S.B. & J.E. Pederson. "Kinship Like I've Never Experienced Before": Modern Mechanical Solidarity on the Appalachian Trail Network, SOC. SCI. & HUMAN. OPEN (Apr. 9, 2024), SSRN No. 4788386, <https://ssrn.com/abstract=4788386>.

2. Della Porta, S.L. et al. *Naturalistic Parent Teaching in the Home Environment During Early Childhood*, 13 FRONTIERS IN PSYCH. 810400 (2022), <https://doi.org/10.3389/fpsyg.2022.810400>.

D. News and Blog Articles

1. AFP. *Bengaluru: How India's "Garden City" Became Garbage City*, HINDUSTAN TIMES (Jan. 27, 2017), <https://www.hindustantimes.com/india-news/bengaluru-how-india-s-garden-city-became-garbage-city/story-wkY96bgDnWx6gCWphczRMM.html>.
2. Choubey, Jitendra. *Most People Say Public Toilets under Swachh Mission in Bad State: Survey*, THE NEW INDIAN EXPRESS (Oct. 2, 2023), <https://www.newindianexpress.com/nation/2023/Oct/02/most-people-say-public-toilets-under-swachh-mission-in-bad-state-survey-2620095.html>.
3. Chandra, Shailaja. *How Does Indore Do It? A Look at the Strategy That Won It the Cleanest City in India Award for 7 Years in a Row*, FRONTLINE (Jan. 13, 2024), <https://frontline.thehindu.com/the-nation/how-does-indore-do-it-india-cleanest-city-7-years-in-a-row-strategy/article67737621.ece>.
4. Dhillon, Amrit. *"I've Seen People Stop Their Cars to Pick Up Litter": How One City Cleaned Up Its Streets*, THE GUARDIAN (Apr. 4, 2025), <https://www.theguardian.com/environment/2025/apr/04/how-indian-city-indore-beat-the-rubbish>.
5. Dhillon, Amrit. *India to Revise Colonial-Era Penal Code and Toughen Laws Protecting Women*, THE GUARDIAN (Aug. 13, 2023), <https://www.theguardian.com/world/2023/aug/14/india-laws-protecting-women-review-penal-code>.
6. Kulkarni, Chiranjeevi. *Pay Rs 1,000 for Peeing in Public in Bengaluru*, DECCAN HERALD (Jan. 15, 2020), <https://www.deccanherald.com/india/karnataka/bengaluru/pay-rs-1000-for-peeing-in-public-in-bengaluru-794990.html>.
7. *Law and Awareness Only Ways to Keep Public Spaces Clean*, THE NEW INDIAN EXPRESS (Nov. 17, 2023), <https://www.newindianexpress.com/opinions/editorials/2023/Nov/17/law-and-awareness-only-ways-to-keep-public-spaces-clean-2633523.html>.

8. *Lakes, Schools, Streets—All Choked by Waste at Tambaram*, TIMES OF INDIA (CHENNAI) (June 5, 2025), <https://timesofindia.indiatimes.com/city/chennai/lakes-schools-streets-all-choked-by-waste-at-tambaram/articleshow/121631165.cms>.
9. Mitha, Sajjid. *India Imposes an Environmental Compensation Penalty on Violators of the Plastic Waste Management Rules*, POLYMERUPDATE (Aug. 26, 2024), <https://www.polymerupdate.com/News/Details/1332360>.
10. N., Hamsaveni. *Poor Citizen Participation Marks Start of Bengaluru's 10-Day Cleaning Drive*, TIMES OF INDIA (Apr. 21, 2025), <https://timesofindia.indiatimes.com/city/bengaluru/poor-citizen-participation-mark-s-start-of-bengalurus-10-day-cleaning-drive/articleshow/120493264.cms>.
11. Papke, David R. *Influential Articles: Llewellyn's Law-in-Action*, MARQ. U. L. SCH. FACULTY BLOG (Mar. 13, 2009), <https://law.marquette.edu/facultyblog/2009/03/influential-articles-llewellyn's-law-in-action/>.
12. Sharma, Nootan. *Tourists Keep Their Cars Clean, Use Hills as Dustbins. Can Anyone Say “Atithi Devo Bhava”?*, THE PRINT (Dec. 22, 2024), <https://theprint.in/opinion/tourists-keep-their-cars-clean-use-hills-as-dustbins-can-anyone-say-atithi-devo-bhava/2414466/>.

E. Miscellaneous

1. Clune, Bill. *Law in Action and Law on the Books: A Primer*, NEW LEGAL REALISM (June 12, 2013), <https://newlegalrealism.org/2013/06/12/law-in-action-and-law-on-the-books-a-primer/>.
2. *Cleanliness in Japan: Its Roots and Modern Struggles*, JAPANETIC (June 2, 2024).
3. ENCYCLOPÆDIA BRITANNICA. *Socialization*, <https://www.britannica.com/science/socialization>.

4. OXFORD LEARNER'S
DICTIONARIES. *Encouragement*, <https://www.oxfordlearnersdictionaries.com/definition/english/encouragement>.

5. OXFORD LEARNER'S
DICTIONARIES. *Encouraging*, <https://www.oxfordlearnersdictionaries.com/definition/english/encouraging>.