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## **FIRECRACKERS IN INDIA: A BRIEF REVIEW OF DECISIONS OF THE COURTS**

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### **ABSTRACT**

India is the second largest manufacturer of firecrackers in the world and majority of it is for domestic consumption. Bursting of crackers in celebrations like festivals, weddings, rituals etc. is a common practice in India. However, firecrackers have become one of the most contributing factors to air and noise pollution. Over the years, the law relating to firecrackers has evolved through the decisions of the courts. These decisions reflect various constitutional provisions specifically, fundamental rights. Summarising all the decisions of the courts, it has been observed that the apex court has struck down any practice which infringes on the right to life and personal liberty of persons. The courts have been frequently seen to apply the principle of *res ipsa loquitur* for any torts relating to fireworks which have resulted in death, damages or any injury to person or property. The penal provisions of public nuisance and criminal negligence have also played a key role in deciding cases relating to fireworks. Licensing is of key importance for manufacturing or trade of firecrackers. The manufacturers, dealers have to strictly comply to provisions of the statute or their license stands cancelled. This is to ensure that safety and procedural norms are strictly complied with. The apex court has provided directions for fireworks used for international export stating that they should have higher noise levels because the international standards are higher than the Indian average. The apex court has also suggested to adopt a new methodology for calculating noise levels of firecrackers based on mass of charge and size to ensure efficient calculations. Lastly, there is a need to educate the society especially children about the laws in the country with respect to fireworks. We can only secure our future if we create awareness in our present.

**Keywords:** Firecrackers, Air Pollution, Noise Pollution, Article 21, Licensing

## INTRODUCTION

The first mentions of saltpetre (used in fireworks) date back to 300 BCE by Kautilya in his written work, Arthashastra. He mentions that saltpetre could be used to create smoke which could then be used to fight off enemies in wars.<sup>1</sup> In 1400 CE Ludovico di Varthema, an Italian traveller who visited India described the people of Vijayanagara as ‘masters of producing fireworks’<sup>2</sup> Prataprudradeva, a royal author from Orissa, in 1500 CE gives details of pyrotechnic mixtures and manufacturing formulae for fireworks in his work Kautukacintamani.<sup>2</sup> In 1600 CE a poem by saint Eknath called Rukmini Swayamwara describes Rukmini’s wedding with Krishna and the poem describes a variety of fireworks including *phholjhadis* (rockets).<sup>2</sup> In the 19<sup>th</sup> century with the fall of the Mughal empire, Diwali celebrations became more prominent along with the prominent use of fireworks. Today, the festival of Diwali is celebrated with great pomp with firecrackers being one of the main attractions.

In India, firecrackers are a major source of air and noise pollution especially during Diwali. Bursting of firecrackers releases a huge amount of gaseous pollutants such as carbon monoxide, ozone, sulphur dioxide, and nitrogen oxides, metals, organic and inorganic compounds thereby increasing the concentrations of particulate matter (PM).<sup>3</sup> This increase in PM impacts the respiratory and cardiovascular systems adversely.<sup>4</sup> The occurrence of respiratory illnesses like asthma, lung carcinoma, respiratory infections, chronic obstructive pulmonary disease (COPD) etc. increases with the increase in concentrations of particulate matter pollutants.<sup>5</sup>

India is the second largest manufacturer of firecrackers in the world and majority of it is for domestic consumption. Almost 90% of the total fireworks in India are produced in the town of Sivakasi, Tamil Nadu.<sup>6</sup> In India, the use, manufacture, transportation, import, export, possession and sale of fireworks is regulated by the Explosives Act, 1884 and Explosive Rules, 2008.

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<sup>1</sup>Barua, P., Military Transition in Early Modern Asia, 1400-1750: Cavalry, Guns, Government and Ships. The Historian, (2014).

<sup>2</sup>P.K. Gode, The History of Fireworks in India Between AD 1400 and 1900, (1953)

<sup>3</sup>Attri, A.K. et al., Formation of ozone by fireworks, 411(6841), Nature, pp.1015-1015, (2001).

<sup>4</sup>Godri, K.J. et al., Particulate oxidative burden associated with firework activity, 44(21), Environmental science & technology, pp.8295-8301, (2010).

<sup>5</sup>Gordon, S.B et al., Respiratory risks from household air pollution in low and middle income countries, 2(10), The lancet Respiratory medicine, pp.823-860, (2014).

<sup>6</sup>Mehra, S et al., Ecofriendly (Green) Firecrackers Vs Old Firecrackers And Their Health Effects: A Systemic Review (2022).

## A. CONSTITUTIONAL PROVISIONS

Over the years, the law relating to firecrackers has evolved through the decisions of the courts. These decisions reflect various constitutional provisions specifically, the fundamental rights. The provisions which have been repeatedly relied on are mentioned below:

- a. right to life,
- b. right to freedom of speech and expression,
- c. right to carry on any trade or business,
- d. right to freedom of religion
- e. right to equality

### 1. Right to life (Article 21)

The right to life, does not merely mean animal existence. It guarantees the right to live a life with dignity. Thus, it encompasses all aspects of life which are required to lead a meaningful and a peaceful life.<sup>7</sup> The right to get pollution free air,<sup>8</sup> right to live in an environment free from noise pollution,<sup>9,10</sup> right to sleep<sup>11</sup> are all included in the scope of right to life through various decisions of the courts.

The right to sleep can be exercised freely if the environment is free of noise disturbances. With this view in mind, the court In Re: Noise Pollution<sup>12</sup> divided the firecrackers into two categories:

- a. Sound emitting firecrackers and
- b. Colour/light emitting firecrackers

It issued directions with respect to a complete ban on the bursting of sound emitting firecrackers between 10 p.m. and 6 a.m. to ensure undisturbed sleep of the residents living in the vicinity. Similarly, in 2018, the court issued directions to the police to ensure that the bursting of firecrackers should take place at designated time and place to reduce the levels of noise pollution.<sup>13</sup> With a view to control air pollution, the court issued directions to the Central Pollution Control Board (CPCB), respective State Boards and Pollution Control Committees of the States and Union Territories to carry out monitoring for 14 days (7 days prior to commencement of Diwali and 7 days after Diwali) for the following parameters namely, iron, aluminium and barium along with other parameters of the Ambient Air Quality Criteria Values

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<sup>7</sup> Maneka Gandhi v. Union of India, A.I.R. 1978 S.C. 597

<sup>8</sup> Subhash Kumar v. The State of Bihar, A.I.R. 1991 S.C. 420

<sup>9</sup> Free Legal Aid Cell Sughan Chand Aggarwal v. State (NCT of Delhi), A.I.R. 2001 DEL 455

<sup>10</sup> P.A. Jacob v. Superintendent of Police, A.I.R. 1993 KER 1

<sup>11</sup> In Re Ramlila Maidan Incident v. Home Secretary, Union of India, A.I.R. 2012 SCW 3660

<sup>12</sup> In Re Noise Pollution, A.I.R. 2005 S.C. 3136

<sup>13</sup> Arjun Gopal v. Union of India, A.I.R. 2018 S.C. 5731

(AAQCVs) proposed by the CPCB. The data generated through these measures would enable the authorities to monitor air pollution in the areas and regulation of metal particulate matter in air.<sup>13</sup>

## **2. Right to freedom of speech and expression [Article 19(1)(a)]**

The court guarantees freedom of speech and expression under Article 19(1)(a) of the Constitution of India. However, this right is subjected to restriction under 19(2). A person cannot be forced to listen and no person has the right to trespass into the ears of the other. While one individual has the right to expression the others have the right to listen or to decline the same.<sup>14</sup> Article 19(1)(a) cannot override the right safeguarded under Article 21. Quietness is non-negotiable to free enjoyment of a dwelling property. Noise creates a cause of action for the neighbours for nuisance if it interferes with their ordinary course of life. A person cannot be made a captive listener and made to hear noise creating firecrackers. The Environment (Protection) Act, 1986 prescribes rules for permissible limit of noise in residential, industrial areas, commercial areas or silence zone. Silence zone comprises of not less than 100 meters around educational institutions, hospitals, religious places and any other area which is declared to be by the concerned authority. The firecrackers produced, sold, used or manufactured which are above the permissible limit [i.e., 125 dB (A) or 145 dB (C)pk] at 4 meters distance from the point of bursting are banned. The above restrictions on firecrackers are found to be reasonable by courts thus, protecting the right under 19(1)(a) of individuals versus the right to decline listening.

## **3. Right to carry on any trade or business [Article 19(1)(g)]**

In *Vellore Citizens' Welfare Forum v. Union of India*,<sup>15</sup> a drastic view was taken to ban all the tanneries when they were found to be causing immense damage to the environment. In this judgement Article 21 was given supremacy over the right to carry out business enshrined in Article 19(1)(g). Similarly, in 2018 it was argued that the principle of *res extra commercium* should be applied to the trade of firecrackers as they pose a health hazard. However, the court rejected this plea. It stressed on the fact that right to health, recognised under Article 21 and right to carry out trade under Article 19(1)(g) should both be given their recognition.

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<sup>14</sup> *Om Birangana Religious Society v. State*, (1996) 2 CALLT 474 HC

<sup>15</sup> *Vellore Citizens' Welfare Forum v. Union of India* A.I.R. 1996 S.C. 2715

The court intended to balance the right of the manufacturers under Article 19(1)(g) and the right of the petitioners under Article 21. It did however, impose a complete ban on the online sale of firecrackers on e-commerce websites.<sup>13</sup> The Supreme Court expressed that every individual has the right to carry out any lawful trade but subject to the reasonable condition as may be decided by the governing authority of the country which is essential to the health of the community. The fundamental right to carry out trade which takes away the right to health of the community by creating pollution is not maintainable and reasonable restrictions need to be imposed.<sup>16</sup> In the case of *Burrabazar Fire Works Dealers v. The Commissioner of Police and Ors.* the court supported the view of the Pollution Control Board of West Bengal which had not banned all types of fireworks but only those which created noise above the permissible limits.<sup>17</sup> The same question arose before the court, as in the *Burrabazar* case, in *Mohan Fireworks and Another v. State of West Bengal and Ors.*, and the court applied the principle of *res judicata* as the law point was already decided in the *Burrabazar* case.<sup>18</sup> In West Bengal, in 2020, the courts imposed a complete ban on manufacture, sale and bursting of firecrackers including green crackers which were approved previously by the Supreme Court.<sup>19</sup> However, this judgement was immediately reversed in the same month where the Supreme Court refused to impose a blanket ban on all the firecrackers. The court in this judgement took to the view that it is necessary to maintain a balance between rights of the public under Article 21 and rights of the manufacturers under Article 19(1)(g).<sup>20</sup> The same principle was applied by the Orissa High Court in 2021 wherein it refused to impose a blanket ban and allowed the use of green crackers only.<sup>21</sup>

#### **4. Right to freedom of religion (Article 25)**

The court has observed previously, that religious practice which forms an essential and integral part of religion is protected under Article 25 and 26. A practice may be religious but not an essential and integral part of the religion, which is not protected under these provisions.<sup>22,23</sup> In *Re: Noise Pollution*, the court held that the festival of Diwali is the festival of lights and pooja. It is not mainly associated with firecrackers. Bursting firecrackers in Diwali does not form an integral part of the Hindu religion and it does not have any sanctity in religious

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<sup>16</sup> *Cooverjee v. Excise Commissioner and the Chief Commissioner, Ajmer*, A.I.R. 1954 S.C. 220

<sup>17</sup> *Burrabazar Fire Works Dealers v. The Commissioner of Police and Ors.*, A.I.R. 1998 CAL 121

<sup>18</sup> *Mohan Fireworks and Another v. State of West Bengal and Ors.*, (1999) 3 CALLT 76 HC

<sup>19</sup> *Anasua Bhattacharya v. State of West Bengal*, W.P.A. 9184 of 2020

<sup>20</sup> *Goutam Roy v. State of West Bengal*, SLP (C) NO.17993/2021

<sup>21</sup> *All Odisha Fireworks Dealers Association v. Union of India*, A.I.R. Online 2021 ORI 506

<sup>22</sup> *Javed and Ors. v. State of Haryana and Others*, A.I.R. 2003 S.C. 3057

<sup>23</sup> *Ismail Faruqui and Ors. v. Union of India*, A.I.R 1995 S.C. 605 A

texts.<sup>12</sup> The festival of Diwali has religious context only in illuminating the area with diyas which over the years was substituted with candles.<sup>24</sup> In *Vellore Citizens' Welfare Forum v. Union of India*,<sup>15</sup> it was reiterated that bursting firecrackers, is not a core religious practice so Article 25 is subjected to Article 21 of the Constitution. Thus, banning fireworks does not violate the right of individuals under Article 25.

### **5. Right to equality (Article 14)**

It has been established by the apex court that Article 14 forbids class legislations, however it does not forbid reasonable classification for the purpose of the legislation.<sup>25</sup> Class legislation should be justified with the help of two tests which have been laid down by the court. (a) the classification must be founded on intelligible differentia and (b) the differentia should be based on a rational relation to the object sought and achieved by the statute.<sup>26</sup>

In *V.K. Vanaja v. Union of India*,<sup>27</sup> classification of fireworks traders was made for temporary licensees and permanent licensees. The licenses to sell fireworks of temporary licensees were suspended so as to ensure smooth and peaceful functioning and lawful campaigning by political parties during elections in Puducherry. However, permanent licensees were granted exemption from the same which allowed them to continue their trade. This was challenged in the Madras High Court stating that such a classification is arbitrary and there is no intelligible differentia and rational nexus and thus, violative of Article 14. The court disagreed and justified it by saying that the statute provides for different procedures in matter of granting permanent and temporary licenses, thus classifying the two in such a way was valid. Additionally, private interest of licensees cannot supersede the interest of the public at large, thus, the court upheld the order of the lower court of allowing only permanent licensees to possess and sell fireworks.

### **B. TORTS**

In the case of *S. Syeda Mahomed Rowther v. A. Shanmugasundaram Chettiar*,<sup>28</sup> it was seen that the leased house in which the defendant stored the fireworks resulted in a fire explosion. Here, the court applied the principle of *res ipsa loquitur* as there was *prima facie* evidence of negligence. The court opined that it is the special duty of the defendant to take proper care

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<sup>24</sup> *Manisha Sharma v. Commissioner of Delhi Police*, W.P.(C) No.10317/2015

<sup>25</sup> *D.S. Nakara v. Union of India*, 1983 A.I.R. 130

<sup>26</sup> *State of West Bengal v. Anwar Ali Sarkar*, A.I.R. 1952 S.C. 75

<sup>27</sup> *V.K. Vanaja v. Union of India*, A.I.R. Online 2019 MAD 401

<sup>28</sup> *S. Syeda Mahomed Rowther v. A. Shanmugasundaram Chettiar*, A.I.R. 1943 MAD 343

while storing dangerous things such as fireworks. Moreover, the quantity of fireworks which were stored was over the licensed limit and thus, the court found it fit that the defendant paid necessary damages to the lessor. In the case of T.C. Balakrishnan Menon and Ors. v. T.R. Subramanian and Anr.,<sup>29</sup> again, the principle of *res ipsa loquitur* was applied. Here, a *minnal gundu* (a firecracker), fell in the crowd and burst resulting in an injury to a person. The court applied the principle of strict liability as given in *Rylands v Fletcher*<sup>30</sup> and opined that there was negligence on part of the defendant as it was a non-natural use, the user could not escape liability. The defendant was held liable for damages to the injured party.

### C. INDIAN PENAL CODE PROVISIONS

In the case of *Bhalchandra and Anr. v. The State of Maharashtra*,<sup>31</sup> the fireworks manufacturers had their unit situated in close proximity of a residential complex. There was an explosion in the factory causing death and injury to persons in the vicinity. The court found that the dealers were negligent as they had possessed fireworks which were prohibited. The court held the manufacturers liable under sections 304A (causing death by negligence) and 337 (Causing hurt by act endangering life or personal safety of others). In *Kamr-Ud-Din v. Emperor*,<sup>32</sup> the box carrying fireworks exploded causing death of a person. The court held the defendants liable under sections 304A and 338 (Causing grievous hurt by act endangering life or personal safety of others).

Noise pollution created by firecrackers can be also dealt with under sections 268 (Public nuisance), 290 (Punishment for public nuisance – fine up to Rs 200) and 291 (Continuance of nuisance after injunction to discontinue) of the Indian Penal Code.

### D. LICENSING FOR THE SALE OF FIREWORKS

Chapter VII of the Explosives Rules, 1983 and VIII of Explosives Rules, 2008 lay down provisions for licensing for the sale of fireworks.

#### **Cancellation of licenses in view of safety provisions**

In *Anvar Sadik v. Additional District Magistrate, Kollam*,<sup>33</sup> the courts relied on Explosives Rules, 2008, Rule 83(4)(a) to cancel the license of a fireworks dealer on the account of the shop

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<sup>29</sup> T.C. Balakrishnan Menon and others v. T.R. Subramanian and another, A.I.R. 1968 KER 151

<sup>30</sup> *Rylands v. Fletcher*, (1868) LR 3 HL 330

<sup>31</sup> *Bhalchandra and another v. The State of Maharashtra*, A.I.R. 1968 S.C. 1319

<sup>32</sup> *Kamr-Ud-Din v. Emperor*, 1905 CRI. L. J. 207

<sup>33</sup> *Anvar Sadik v. Additional District Magistrate, Kollam*, (2021) 1 KER L. J. 284

not having an independent entrance and emergency exit from open air. Moreover, the shop was located in a commercial complex in a crowded locality wherein, the entrances and exits were likely to be crowded. In cases of emergencies, safe evacuation of people in the premises would have been difficult, eventually leading to loss of life, thus the court justified cancelling the license of the dealer. In the case of *Dheeraj Kataria and Ors. v. State of Uttar Pradesh*,<sup>34</sup> it was emphasized that the condition to sell fireworks from a specified open place taking into account safety of the general public does not violate the rights under the license given to fireworks sellers. In *Shabi Ali v. State of Uttar Pradesh*,<sup>35</sup> it was reiterated that the population in the area of the shop plays a key role in granting or renewal or cancellation of a license to sell fireworks. The shops should not be situated within 100 meters of a residential complex. In *Sanjay Kumar v. State of Uttar Pradesh*,<sup>36</sup> the fireworks dealer was ordered to shift the premises from a thickly populated area to a different locality in view of security and larger public interest. It was observed by the court that public interest is much higher than the interest of the individual. A similar judgement was passed by the court in the case of *Banaskantha District Fire Works Association v. District Magistrate, Banaskantha and Anr.*<sup>37</sup> wherein the court refused to renew the license of the fireworks dealer on account of it being located in a thickly populated area. The same principle was applied in the case of *M/S. J. Shah and sons v. Union of India*,<sup>38</sup> and the license was cancelled. It is a mandatory requirement according to Rule 83(4)(e) of the Explosives Rules, 2008 that the place of business should be accessible to firefighting. The court specifically reasoned that in case of an emergency the fire extinguisher vehicle would have had to pass through a heavily congested road to reach the premises of the shop, thus, cancelling the license of the dealer. In the case of *Umesh Kumar Prasad v. State of Jharkhand*,<sup>39</sup> a similar view was held by the court.

## **E. EXPORT OF FIRECRACKERS**

The apex court of the country has in orders prohibited the manufacture of firecrackers which generate noise level exceeding 125 dB (AI) or 145 dB(C)pk at 4 meters distance from the point of bursting. This restriction is absolute and there is no discrimination made on the firecrackers used for export. The average permissible noise level in foreign countries is much above the

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<sup>34</sup> *Dheeraj Kataria and Ors. v. State of Uttar Pradesh*, 2011 (3) ALJ 669

<sup>35</sup> *Shabi Ali v. State of Uttar Pradesh*, 2018 (6) ALJ 731

<sup>36</sup> *Sanjay Kumar v. State of Uttar Pradesh*, 2004 ALL. L. J. 239

<sup>37</sup> *Banaskantha District Fire Works Association v. District Magistrate, Banaskantha*, A.I.R. 1989 GUJ 48

<sup>38</sup> *M/S. J. Shah and sons v. Union of India*, A.I.R. Online 2018 JHA 680

<sup>39</sup> *Umesh Kumar Prasad v. State of Jharkhand*, A.I.R. Online 2020 JHA 1085



average Indian standards and thus, there is a need to lift this restriction of firecrackers to be exported internationally. Without it, it becomes a challenge to sell Indian firecrackers in the international market as they do not meet the needs and standards of the international arena. Keeping this in view, the Supreme Court, In Re: Noise Pollution<sup>12</sup> has held that firecrackers for the purpose of manufacture can bear higher noise levels, however it imposed a few conditions for the same which are as below:

- a. The manufacturer is permitted to do so only when he has an export order with him.
- b. The noise levels of the firecrackers should comply with the noise standards in the prescribed country to which they are being exported.
- c. These firecrackers should have different coloured packaging from those which are to be sold in India for clear identification.
- d. The packaging should have a clear print stating that they are not to be sold in India.

The above rules are a mandatory requirement if the manufacturers are to sell firecrackers with higher noise levels. Failing to follow the rules, the manufacturers would be liable to fine.

#### **F. NEED FOR A NEW METHODOLOGY FOR CALCULATING NOISE LEVELS**

The current method of calculating noise levels for the purpose of manufacturing has a lot of shortcomings.

- a. The instruments used to measure the sound from firecrackers are extremely expensive.
- b. Factors like wind velocity, temperature and humidity may manipulate the readings of noise levels.
- c. Firecracker manufacturers have to go to centralised testing services for untested firecrackers. Analysing these drawbacks, if we were to adopt the system of prescribing weight and composition of chemicals in the firecrackers by analytical testing followed by publication of results, the above flaws can be taken care of. This system would help in identifying the illegal crackers easily. The two most important parameters of firecrackers for determining the noise levels are size and mass of charge. By controlling these parameters noise levels can be achieved precisely. The climatic conditions can play a role in manipulating the results; however, it is much more precise than that of the previous method. The Supreme Court opined that the method of fixing maximum chemical composition for each firecracker keeping in mind the maximum permissible noise limit would be more effective in regulating the noise levels and should be adopted by manufacturers. It made suggestions to the Explosives Department to set up research and development laboratories to define chemical formulae of each and every firecracker. It ordered the Department to specify ratio as well as the maximum permissible

weight of every chemical used for the purpose of manufacture. By adopting this methodology, the defects of the current system can be dealt with.<sup>12</sup>

### **G. NEED TO EDUCATE THE FUTURE GENERATION**

In *M.C. Mehta v. Union of India*,<sup>40</sup> the court stressed on the need to create environmental awareness amongst students through education. In *Re: Noise Pollution*,<sup>41</sup> the court encouraged the State Education Resource Centres in all the states and Union Territories as well as the management and principals of the schools to take appropriate measures to educate students about the harmful effects of air and noise pollution and encourage them to follow the directions issued in this case. In *Arjun Gopal v. Union of India*,<sup>13</sup> a similar view was maintained by the court and it ordered the Government of NCT of Delhi and other states in the NCR to formulate a plan of action within 15 days to reach out to children in schools through staff members, volunteers and NGOs to educate them on the ill effects of noise and air pollution and urge them to reduce bursting of firecrackers if not eliminate. The court also encouraged the government to interact with medical institutions for issuing advisories to people explaining them the hazards of bursting fireworks. Children are the future citizens of this country and educating them at the school levels will help in spreading awareness of the same.

### **CONCLUSION**

Fireworks is certainly not a new concept and has been in the history books since thousands of years. However, in India, today, fireworks have become one of the major nuisances causing noise pollution and air pollution during festivities. Through years, there have been various decisions of the courts with the aim to reduce the hazards of fireworks. These decisions have been made on the basis legislations like The Constitution,<sup>42</sup> the Indian Penal Code,<sup>43</sup> the Environment Protection Act,<sup>44</sup> The Air (Prevention and Control of Pollution) Act,<sup>45</sup> Explosives Act,<sup>46</sup> Explosives Rules,<sup>47</sup> etc. There is a need to create awareness, in citizens especially children, about these laws and the adverse consequences of bursting fireworks. The respective State Governments should formulate plans to ensure that there is active participation of the

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<sup>40</sup> *M.C. Mehta v. Union of India*, (2004) 1 SCC 571

<sup>41</sup> *In Re: Noise Pollution*, A.I.R. Online 2001 S.C. 256

<sup>42</sup> India. (1950) The Constitution of India.

<sup>43</sup> The Indian Penal Code, 1860 ACT NO. 45 OF 1860 1\* [6th October, 1860.]

<sup>44</sup> The Environment (Protection) Act, 1986. No. 29 OF 1986. [23rd May, 1986.]

<sup>45</sup> The Air (Prevention And Control Of Pollution) Act, 1981 ACT NO. 14 OF 1981

<sup>46</sup> The Explosives Act, 1884. Act No. 4 OF 1884. [26th February, 1884.]

<sup>47</sup> The Explosives Rules, 2008

community. We can secure our future only if we create awareness in our present.

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