




ACCESS TO ENVIRONMENTAL JUSTICE IN INDIA: EVALUATING THE ROLE OF THE NATIONAL GREEN TRIBUNAL (NGT) IN MARGINALIZED COMMUNITIES

Priya Karmakar Das ¹  & Dr. Asha Rameshchandra Tiwari ²

RESEARCH ARTICLE



Author Details:

¹ Ph.D. Scholar,
Kavayitri Bahinabai Chaudhari North
Maharashtra University, Jalgaon,
Maharashtra, India;

² Professor, Ntvs's Law College,
Nandurbar, Affiliated Under Kavayitri
Bahinabai Chaudhari North
Maharashtra University, Jalgaon,
Maharashtra, India

Corresponding Author:

Priya Karmakar Das

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Abstract

Environmental justice in India is directly connected to the constitutional rights of people, and it fundamentally lies in sustainable development. India faces dual challenges to balance the economic development of the nation, and maintain a sustainable environment. This imbalance leads to an alarming rate of ecological destruction, which affects all, including marginalized communities. In fact, marginalized communities are suffering a lot compared to other individuals due to the proximity of hazardous activities and a lack of resources to resist environmental harm. The National Green Tribunal was established in 2010, to provide environmental justice to all without discrimination based on any grounds such as religion, race, caste, sex, place, wealth, and poverty, etc. This paper critically analyses the role of NGT to ensure environmental justice for marginalized communities in India. It examines the efficiency of the NGT, as well as legal frameworks, case laws, procedural barriers, participatory mechanisms, and implementation gaps by using doctrinal and analytical methods. The paper concludes with commendable recommendations that are necessary to transform the tribunal into a more effective and accessible justice forum for all.

Keywords: *Environmental Justice, National Green Tribunal, Marginalized Communities, Sustainable Development, Social Inequality, Pollution and Public Health, Judicial Activism in India*

Introduction: Define Environmental Justice in the Indian context

The word 'Justice' means fairness, or righteousness. Here, environmental justice is a nation-based idea that provides equal treatment to all, regardless of colour, origin, or income, etc., concerning the development, implementation, and enforcement of laws, rules, regulations, and policies relating to the environment. It focuses on combating the disproportionate impact of environmental pollution and the threat to the environment that marginalised communities regularly suffer. In 1980, the concept of environmental justice originated in the United States. It evolves through several judicial interpretations, constitutional rights, and increasing participation in civil society. It ensures equitable distribution of environmental benefits among all, such as clean air, water, and natural resources, and helps to mitigate displacement and ecological risk, to safeguard marginalized, along with vulnerable communities from inappropriate impacts that lead to effects on their quality of life.

The principles of environmental justice lie in equity, which ensures fair treatment. It also promotes participation of all in the decision-making process, accountability to hold responsible for addressing environmental injustice. Prevention of environmental hazards through justice system, and intersectionality which helps to recognize the interconnection among social, economic, and environmental issues, help to identify the root causes of environmental injustice towards the common people particularly, marginalized communities. In India's legal system, getting ecological justice is not merely about environmental protection and the prevention of environmental risks; it is a broader issue including social equity as well as human rights of marginalized people, and sustainable development of the nation.

The principles of environmental justice lie in equity, which ensures fair treatment. It also encourages the involvement of everybody in the decision making process. Another valuable principle is accountability, which makes responsible parties answerable to respond to the environmental injustice. It also focuses on how the justice system prevents environmental hazards. Further, intersectionality plays a key role in environmental justice. It aids in the appreciation of the interdependence between social, economic, and environmental problems. This helps to identify the root causes of environmental injustice towards the common people particularly, marginalized communities. In India's legal system, getting ecological justice is not merely about environmental protection and the prevention of environmental risks. It is a broader issue counting social equity as well as human rights of marginalized people, and sustainable development of the nation.

Environmental Justice and Constitutional Rights

The basic rights of the Indian Constitution are closely linked to the environmental rights. The environmental justice creates both substantive and procedural rights of citizens in India in a number of ways under the constitution.

Article 14 - Promoting Environmental Equality and Non-Discrimination: Provides “the State shall not deny to any person equality before the law or the equal protection of the laws within the territory of India”. This article protects all citizens of India, including unprivileged communities, from any kind of discrimination and is considered the cornerstone of anti-discrimination law. Further, Article. 14 ensures that no one, especially socially marginalised people, must be deprived of justice due to environmental degradation. During the delivery of environmental justice, National Green Tribunal frequently applies Article 14 to protect the rights of vulnerable groups such as Dalits, slums, tribals, or the urban poor.

Article 21 - Right to Life to Include Environmental Rights: Provides “no person shall be deprived of his life or personal liberty except according to procedure established by law”. Right to life is a fundamental right of people that also says that everyone, including vulnerable groups, has the right to live in a pollution-free environment with dignity. National Green Tribunal also upholds this fundamental right from time to time to deliver environmental justice to prevent ecological harms and protect ordinary people.

Article 48A Directive Principles and State Responsibility to Environment: Provides “The State shall endeavour to protect and improve the environment and to safeguard the forests and wildlife of the country”. Article. 48A is a Directive Principle that directs the State to protect common people from several forms of pollution and improve the quality of the environment. It is a non-justiciable nature that helps to shape the policy and enlightens interpretation of judicial and quasi-judicial acts, including in the NGT.

Article 51A(g) Civic Responsibility in the Environment Conservation: Provides “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”. This article is recognized under the fundamental duty of the Indian Constitution, which imposes an obligation on citizens in India to maintain a sustainable, pollution-free environment. This article is used as a weapon by the marginalized communities to act against environmental polluters and violators before the NGT.

Marginalized Communities

Marginalised communities are the communities where people are discriminated against based on their social, economic, political, and cultural background. They have been excluded from full participation in civil life. People are treated as being marginalised due to several factors such as religion, race, gender, disability, origin, economic status, sexual orientation, ethnicity, or immigration status. People of these communities face systematic barriers, including limited access to resources, employment opportunities, decision-making power, and denial of proper health care facilities, education, and equal treatment in society.

Environmental degradation in India has an adverse impact on marginalized communities. These communities include the Scheduled Castes, the Schedule tribes, the rural poor, urban slum dwellers, etc. These Scheduled Castes and the Schedule tribes people, who are ecologically vulnerable, live in polluted areas, along with limited access to environmental amenities. Further, Schedule tribes are facing disadvantages due to mining, deforestation, and dam projects on ancestral lands, and the rural poor who live their life on natural resources are getting poorly affected due to environmental pollution. In these urban slums, people live in overcrowded and unsanitary conditions with minimal access to essential resources. Due to the socio-economic background of the marginalised people, they are forced to live near hazardous sites, and denied access to the minimum quality of life and an equal justice system.

Environmental Justice and Marginalized Communities

Historical Background of Environmental Justice in India: In India, environmental justice has been evaluated through judicial activism rather than legislative provisions. Internationally, it emerged around 1980 during the civil rights movement. Still, in India, it evolved in the post-1980 era through the public interest litigation and several landmark case studies such as Rural Litigation and Entitlement Kendra v. State of Uttar Pradesh (1985), M.C. Mehta v. Union of India (1986), and Vellore Citizens’ Welfare Forum v. Union of India (1996). These landmark judgments helped to set up the foundation of environmental justice in India with the applicability of fundamental rights to live in a healthy environment, as provided by the Constitution of India.

However, environmental justice is still a burning issue in a developing country like India, where a particular community have been historically facing discrimination or deprivation based on several grounds. Now, the movement of environmental justice has slowly transformed into a social issue from a green issue in India, where environmental destruction already negatively impacts the vulnerable groups who are suffering from socio-economic marginalization.

Problem of the research: Environmental Destruction and Impact on Marginalized Communities: In India, Marginalized groups are known as vulnerable groups, which include Dalits, Racial and Ethnic Minorities, Scheduled Castes, Adivasis or Scheduled Tribes, People with Disabilities, Fisherfolk, Religious Minorities, Rural Agricultural Workers, Refugees, and Urban Slum Dwellers, etc., often reside in areas most exposed to environmental risks. The reasons for these environmental risks are improper disposal of hazardous industrial emissions, inappropriate maintenance of dangerous wastes, contaminated water sources, air pollution, land contamination, and deforestation. Due to a lack of socio-economic background and their limited opportunities in the field of education, health benefits, legal resources, and political representation, they become vulnerable.

The most interrelated factors that affect marginalized communities in India due to environmental hazards are:

- *Proximity to Hazardous Zones:* Mineral-rich forests, which have rich sources of biodiversity, are the hotspots for mining activities. The states of Odisha, Chhattisgarh, and Jharkhand have been suffering ecological degradation due to large-scale projects, including hydroelectric dams and mining. For example, the Odisha POSCO steel plant project affected the land of the state and the livelihood of thousands of Scheduled Tribes forest-dwelling villagers, who struggled to get justice due to limited legal resources and awareness.
- *Urban Poor and Industrial Waste:* Urban marginalized people mostly live in slum areas where they are exposed to environmental toxins due to inadequate maintenance of industrial waste or effluents. Industrial effluents are a significant cause of air pollution in India, such as unauthorized colonies and people living in slum areas in Delhi and Kolkata, or big cities in India, regularly inhale polluted air and live in inadequate sanitation due to inadequate urban planning, and dumping illegal industrial hazards.
- *Bhopal Gas Tragedy (1984):* The Bhopal Gas leak incident occurred in 1984, which is considered the most terrifying disaster in the history of India. Due to the negligence of Union Carbide Corporation, the toxic methyl isocyanate gas was leaked, and more than half a million working-class people and unprivileged communities who lived in nearby areas were exposed to the poisonous gas and died or suffered from long-term health issues. The whole communities were struggling to get justice. The slow legal response and weak enforcement of environmental accountability illustrate the systemic neglect of poor communities in environmental governance.
- *Lack of Legal Literacy and Political Voice:* Due to a Lack of Legal Literacy and Political Voice, marginalized communities cannot reach the legal tribunal on time. Further, to prove environmental issues, scientific evidence and expert testimony play a crucial role, and rigorous legal procedures affect the community, who cannot access justice without a legal aid cell. Thus, due to a poor socio-economic background, their voices remain unheard in the justice forum, and make them everlasting victims of “development-induced displacement” and environmental harm.

Connection Between Social Justice and Sustainable Development: The concept of social justice is incomplete without including environmental justice. In India, the environmental crisis has now become a socio-economic crisis for the marginalised people because the environment becomes both a source of livelihood and vulnerability for marginalized populations. India is facing dual challenges, such as economic development and maintaining a sustainable environment for all. Sustainable development implies meeting the needs of the present without compromising the ability of future generations, which cannot be achieved if vulnerable groups are not receiving justice on time and a sustainable environment for their better livelihood.

The government in India introduced several policies and legislation to eradicate socio-economic discrimination for vulnerable people through incorporating environmental justice into sustainable development. The special tribunal has been formed under the National Green Tribunal Act, 2010, and Judicial activism through the NGT has played a potential role in bridging these gaps, but it still faces weak enforcement links.

Origin of Specialized Environmental Tribunal: To control the adverse impact on marginalized communities due to environmental hazards and to eradicate inappropriate discrimination against unprivileged communities, India demands a proper justice system. Thus, the central government set up a special tribunal to deal with environmental issues in 2010, which is known as the National Green Tribunal. The tribunal aims to provide justice to all with fair treatment.

Despite the existence of several constitutional rights and the active role of NGT in delivering environmental justice, marginalized communities in India are still deprived of achieving environmental justice due to a disconnection between law and its proper implementation, and between ecological protection and social equity. The study is playing a crucial role in understanding the effectiveness of the NGT in protecting the human rights of marginalised people while balancing sustainable development in a developing country like India.

Establishment and Jurisdiction of the National Green Tribunal (NGT): To achieve sustainable development goals, a nation needs a proper justice system for its people. A strong environmental justice system is essential to achieve sustainable development agendas. India has established a special tribunal to protect citizens from environmental harm and to ensure justice. The special green tribunal is known as the National Green Tribunal, which was established in 2010 under the National Green Tribunal Act with the special aim of disposing of environmental cases within 6 months without discriminating based on socio-economic background. Its role as a quasi-judicial authority and significant parts of the tribunal are:

- Jurisdiction and powers deal through Sections 14, 15, 16, and 18.
- Principles applied: *Polluter Pays, Precautionary Principle, Sustainable Development.*
- Special features of the tribunal: Speedy disposal of cases (6-month norm) with the help of technical and judicial members.

Evaluation of the NGT's Role in Protecting Marginalized Communities

The National Green Tribunal has adjudicated numerous cases relating to the environment where marginalized communities are directly involved:

1. Sterlite Industries Case (Thoothukudi, Tamil Nadu): In this case, the residents of Thoothukudi, mainly belonging to fishing and lower-income communities, were suffering from several health issues due to dangerous emissions and effluents discharged

from the Sterlite copper plant. Protestations of people turned into violence in 2018, which led to several deaths and injuries. Protests escalated into violence in 2018, resulting in deaths and injuries.

The government of the state of Tamil Nadu ordered the closure of the Sterlite copper plant, which was directly spreading pollution, and people suffered health issues.

When the case was produced before the NGT, it was held that directly shutting down the plant was not fair and against the rule of natural justice, where the company did not get enough chance to present their side. Thus, NGT was allowed to reopen the plant, but later the Supreme Court overruled the NGT decision and restored the shutdown of the plant.

Throughout the whole issue, people's participation was very low, and ultimately, marginalised people's voices remain overlooked.

2. *Vedanta Mining Case (Niyamgiri Hills, Odisha – Dongria Kondh Tribe)*: Niyamgiri Hills were the home of the Dongria Kondh Tribe. Dongria Kondh was a small tribal community were depended on these hills for its livelihood and culture. Vedanta company wanted to set up a bauxite mine in the Niyamgiri Hills. Initially, NGT permitted mining, but later it was halted by the NGT due to inadequate consultation with locals. Here, the Supreme Court agreed with the NGT decision, and the law allowed the tribal community to make its decision.

3. *POSCO Project (Jagatsinghpur, Odisha)*: The proposed POSCO steel plant was another example where vulnerable people were threatened with displacement, which significantly impacts their livelihood. Later, NGT suspended the proposed project and ordered further inspection and assessment of social and ecological consequences. Here again, consent obtained from affected people remains questionable before granting such a project.

4. *M.C. Mehta Series (Ganga Pollution, Delhi Air Pollution, etc.)*: In the field of environment, the M.C. Mehta cases have shown a roadmap to deal with environmental issues through the PILs, and the environmental directions provided by those cases have been significantly implemented by the NGT. The NGT has taken follow-up and monitors the industrial pollution, vehicular emissions, and waste burning issues that adversely affect the marginalised people.

Critical Evaluation of the NGT's Role in Protecting Marginalized Communities

The role of the national green tribunal is evolving in a progressive manner, which reforms speedily, specially, and equally, an environment justice system in India for all, particularly for those who have limited right to access justice. Over the past years, NGT has pronounced several landmark orders to protect the environment and the common people's rights. But after analysis of different cases of the NGT, through the eyes of marginalized communities, the outcomes appear mixed.

Strengths

- *Specialized forum*: It is a dedicated environmental forum which aims to provide justice within 6 months from the date of registration of the cases. So, it is considered the faster environmental dispute resolution compared to regular courts.
- *Progressive application of principles*: The NGT decided its cases on the basis of the Polluter Pays, Precautionary Principle, natural Justice, and Sustainable Development norms. It is not bound to follow any procedure of civil or criminal procedure courts. Thus, the tribunal can easily manage the long timeline to get fast justice.
- *Judicial reach*: It is easily accessible or reachable for all, such as NGOs, activists, and individuals. The individuals can represent the affected communities without following the rules of traditional *locus standi*.
- *Awareness and visibility*: Currently, the tribunal has been successful in dealing with High-profile cases (e.g., POSCO, Vedanta, river pollution monitoring), which brought environmental justice issues into mainstream discourse.

Weaknesses & Limitations

1. *Procedural Barriers*: Due to the demand for scientific evidence and legal literacy, marginalised groups still face multiple issues in getting proper justice.
2. *Limited Enforcement Powers*: Decisions of NGT face limited enforcement powers because their implementation usually depends on state governments and pollution control bodies, and most of the time, due to political influences, enforcement can dilute the impact.
3. *Urban-Centric Operation*: It is harder for the vulnerable groups to access the tribunal due to a lack of NGT branches, i.e., the principal bench and major zonal benches are in Delhi, Pune, Chennai, Kolkata, and Bhopal.
4. *Inconsistent People's Participation*: It is not a people-friendly court due to limited representation in pre-approval consultations or legal hearings.
5. *Economic Development vs. Environmental Protection Dilemma*: The NGT always faces a dilemma between economic development and environmental protection, which sometimes leads to the denial of people's rights.
6. *Lack of environmental tribunal*: The existence of a few numbers of environmental tribunals in India lead to get inaccessible jurisdictional barrier and high cost-effective justice for marginalised communities.

Implementation Gaps and Systemic Issues

It is proven that the NGT delivers many judgements in favour of marginalised groups, but the enforcement of the judgement faces several systematic barriers which prevent them from getting proper justice, such as:

- Follow-up mechanisms are too weak after the judgment.
- State agencies follow a delayed compliance system.

- Misuse of EIAs (Environmental Impact Assessments) is often used to sideline local voices.
- Traveling and litigation costs prohibit many vulnerable groups.

Thus, despite the existence of progressive legal rights in India, people are still suffering deprivation and environmental inequality.

Recommendations for Reform

In order to make the operation of the NGT more consistent with the principles of environmental justice among the marginalized groups, the following steps will be suggested:

Legal and Procedural Reforms

1. *Strengthen Legal Aid and Representation*
 - In every district, it is necessary to establish Environmental Legal Aid Cells based on the community, which will closely monitor large-scale industrial or mining activity.
 - It should be mandated that state governments must provide free expert evidence support for vulnerable communities while they are litigating against polluters.
 - Mandate Community Consultation Before Clearances: It should be mandatory to consult with the community and receive consent from locals for statutory procedures if the projects will be placed near tribal, rural, or ecologically sensitive areas. Thus, it is necessary to integrate Prior Informed Consent into the statutory procedure
2. *Extend Jurisdictional Reach*: It is necessary to overcome geographic barriers to deliver timely justice. Thus, mobile benches for remote regions are essential to overcome these barriers.

Institutional Improvements

3. NGT needs a strengthened monitoring and Enforcement wing to follow up on compliance defaulters.
4. India needs a Transparent Environmental Impact Assessment Process that discloses all EIA reports in local languages for the public and provides accessible summaries for low-literacy populations.
5. NGT needs to include Integrating Social Justice Indicators, which helps to assess the upcoming projects, such as social vulnerability mapping alongside ecological impact analysis.

Capacity Building

6. *Community Environmental Literacy*: The Government should launch a National Environmental Justice Education Programme with the aim of empowering marginalized communities to recognize the legally challenging ecological threats.
7. NGT needs to appoint more judicial/technical members who have expertise in indigenous rights, rural livelihoods, and social equity to understand the root-level problems.

Conclusion

The National Green Tribunal is a major move towards incorporating environmental justice in the Indian legal context. To the marginalized communities, mostly vulnerable to ecological issues and social-economic deprivation, it provides an official channel of justice against environmental degradation. The difference between law and lived reality is still large however as it can be seen in the analysis of cases. The transformative potential of the NGT is hampered by procedural complexities, bias in the city operations, poor enforcement, and lack of grassroots involvement. The Dongria Kondh case of the Vedanta and the forced settlement of the villagers in the POSCO project have shown that meaningful justice needs to be represented by legal proclamations and effective action, which is grounded locally. In order to realise its vision of being a provider of access to environmental justice to everyone, the NGT needs to move on to a different plane of activity as a quasi-judicial court, it needs to become an active institution of environmental democracy; one that balances industrial development with the inalienable rights of communities to clean water, air, land, and a dignified life. It is only at that point that sustainable development in India will be inclusive, equitable, and just.

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