

Way towards Re-Introducing Criminal Defamation in Digital Diplomacy Affecting National Security: A Comparative Analysis with India

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Abstract— At present, defamation in Digital Diplomacy which is also known as cyber diplomacy or E-Diplomacy has become a significant issue due to its liberty and speedy dissemination of expressions in real time regardless of their validity. Thus, this research aims at finding out the possibility of re-introducing the statutory right of criminal defamation in Sri Lanka regarding digital diplomacy affecting national security. The objectives of this research involves identifying whether defamatory statements which affect the national security in digital diplomacy could be covered by reintroducing criminal defamation laws to the existing legal framework of Sri Lanka and to introduce necessary amendments to the existing legal regime to fill the gaps in the current system of law. The methodology of this research is a combination of Black-letter methodology and the comparative research methodology. These methodologies are used in order to provide a descriptive legal analysis on the area. Moreover, this research would employ a qualitative analysis of primary data including Constitutional provisions, Penal Code provisions, the Computer Crimes Act and judicial decisions and secondary data of journal articles, books and the internet. Additionally, this research will discuss the Indian legal regime relating to the said subject area to highlight the differences in the Sri Lankan and Indian legal regimes. The study indicates the significance of reincorporating criminal defamation laws with necessary amendments to the Sri Lankan legal system with a view of addressing the prevailing issues relating to digital diplomacy affecting national security. Finally, the study concludes providing effective recommendations to the said issue

while protecting the national security of the State and balancing strong inter-state relationships within digital diplomacy at least to a certain extent.

Keywords— Defamation, Digital Diplomacy, National Security

I. INTRODUCTION

“Let us never negotiate out of fear, but let us never fear to negotiate.”

-John F. Kennedy-

Diplomacy is a crucial element which ‘allows a state to accomplish their foreign policy objectives and coordinate their endeavour through dialogue and negotiations to influence the behaviour and subsequent decisions of foreign governments.’¹ At present, it has evolved into a digital platform by way of so-called digital diplomacy. This could be considered as a strengthening point in traditional diplomacy. Digital diplomacy means the utilization of digital tools of communication (which is also referred to as social media) by diplomats to communicate with each other and also with the general public,² through virtual communications methods where stakeholders build complex relationships among each other, even before the physical presence of them. Furthermore, it has effectively minimized the exclusive policy control of States and created a platform for people to express their opinions directly and in

¹ Ross, A. Digital Diplomacy and US Foreign Policy. *The Hague Journal of Diplomacy* 6(3-4): 451-455.

² Lewis, D.. Digital Diplomacy. Gateway House. <<https://www.gatewayhouse.in/digital-diplomacy-2/>> accessed 28 May 2020.

real time³ towards good governance by incorporating a common pool of ideology of the general public without following the dictatorship ideology.

For instance, in India, the Indian Foreign Secretary handles their official Twitter accounts to clarify the questions and take suggestions as well as to interact with people who want to let them know the information about family members who were stuck in Libya. And as a result, 18,000 Indian citizens were rescued from Libya during the 2011 civil war. Here, Prime Minister Narendra Modi has called his ambassadors to “remain ahead of the curve on digital diplomacy”⁴ because of its aspect of massive beneficiality towards the unpredictable situations that arise between inter States, even sometimes States are reluctant to use digital diplomacy due to its risks or the challenges that they have to face by using it. Moreover, the recent proposed Agreement between Sri Lanka and USA which is called as the Millennium Challenge Corporation Agreement led to a wide public discussion which resulted in dissemination of information in digital platforms via videos, posts, articles etc on the aftermath of the Agreement if the proposed Agreement was to be executed. This resulted in reconsideration of the decision of signing the said Agreement because it highlighted the adverse impacts to the national objective, sovereignty and national security which ultimately made the proposed Agreement rendered inoperative.

Therefore, Sri Lanka, being a middle income country can get the full benefit out of its cost efficiency, if Sri Lanka has strong legal safeguards. Furthermore, when analysing the Sri Lankan domestic legal system, the criminal defamation laws which had been repealed from the Penal Code has led to the necessity of re-

introducing an express right to criminal defamation relating to issues arising with regard to national security in digital platforms.

II. METHODOLOGY AND EXPERIMENTAL DESIGN

The research methodology would be a combination of Black-Letter Methodology and Comparative Research Methodology. Under this, a comparative analysis between Sri Lanka and Indian jurisdictions is conducted in order to distinguish the concepts in law. Moreover, the research would employ a qualitative analysis of primary data such as constitutional provisions, other relevant statutory provisions and judicial decisions and secondary data of journal articles, books, research papers and the online sources.

Specifically, the Sri Lankan context is analyzed based on the primary sources including the 1978 Constitution, Penal Code No. 2 of 1883 and the Computer Crimes Act No. 24 of 2007, whereas the Indian context is analysed referring the Indian Constitution 1950, the Indian Penal Code Act No. 45 of 1860 and the Indian Code of Criminal Procedure 1973.

The extent of this research is limited only to the Sri Lankan and Indian jurisdictions. Moreover, only a limited number of judicial pronouncements will be discussed in both the Sri Lankan and Indian contexts, because the research area is broad. Another limitation is that the research is limited to the Black-Letter Methodology and Comparative Research Methodology.

III. RESULTS AND DISCUSSION

A. Effect of defamatory statements in Digital diplomacy

At present, digital diplomacy has become an emerging trend involving both merits and demerits. On one hand, it facilitates two ways communication, creates open conversations through social media platforms such as Twitter, Facebook, youtube channels, instagram, apps etc which pave the way for a State to communicate with both the local and international

³ Jayatilaka, C. The Effects of Digital Diplomacy on International Relations: Lessons for Sri Lanka, <<https://lki.lk/publication/the-effects-of-digital-diplomacy-on-international-relations-a-lesson-for-sri-lanka/>>, accessed 28 May 2020.

⁴ Lewis, D. Digital Diplomacy. Gateway House. <<https://www.gatewayhouse.in/digital-diplomacy-2/>> accessed 30 May 2020.

community, extend diplomatic networks and relationships, lead to transparency and decreases financial and other related costs. And as a small state, Sri Lanka can reduce the financial cost when executing foreign policies as well as by promoting national interest to the international community while gradually influencing public opinion.

On the other hand, best practices on digital diplomacy involve many challenges including confidential information leakage, hacking of the accounts, user anonymity, accountability of the information and dissemination of digital content within a short period of time in a massive community regardless of their geographical location and validity of the information. The scandal of WikiLeaks is illustrative of this.⁵ In this case, WikiLeaks published secret files which included some of a massive collection of confidential emails from Syrian government officials and an overview of U.S. military detention policies. This was criticized by former President Barack Obama as a threat to the U.S. national security.⁶ Thus, at present modern diplomacy is facing many changes at a fast rate which ultimately will disruptively affect the national security and inter-state relationships between States, if digital diplomacy is not maintained properly. Moreover, this will also affect international politics and the public will try to act as virtual diplomats by influencing diplomacy subjectively, because of their own experience, educational background, age and gender etc through digital platforms, with groundless arguments and opinions which will lead to conflict of national interest.

Moreover, if the general public tries to respond to information relating to national interest according to their own perspectives by going beyond the limitations specified in Article 14(1)

(a) of the Constitution,⁷ it will affect not only the national security, but also the breakdown of long lasting inter-state relationships among nations, because of their lack of knowledge about the risks involved in digital platforms. It may lead to complex crises in relation to the physical war, even though the root causes might occur in the virtual environment.

For instance, recently, the former Minister of Finance has tweeted stating that “Pictures from UL 504 from London taking passengers to Shanghai via Colombo: the Sri Lankan crew seen posing with the Chinese flag! The question is why China did not choose one of their own airlines to carry their citizens home. They have over a dozen international carriers!”⁸ For instance, this statement might adversely affect the long lasting inter-state relationships with China based on the subjective interpretations of the general public. Further, this might affect more because the person who had tweeted the above statement is one of the credible political figures in the country. As a result it may adversely affect the national security of the country which might lead to inter-state wars between countries.

Moreover, at present there are many instances relating to creating and attempting to trend hashtags relating to the LTTE terrorist movement such as #eelam, #eelamlibrary, #backtoeelam etc by LTTE friendly diaspora community, even though the Sri Lankan Military had successfully defeated the said terrorist group more than 10 years ago. Therefore, the said LTTE movement might arise strongly in the digital platform by way of a bottom up approach in near future which may be a challenge to Sri Lanka's national security. The Republic of Kosovo would be illustrative of this. It being a newest middle income country and having lack of state recognition in the international arena after declaration of its independency from Serbia,

⁵ Wikipedia, *WikiLeaks*, <<https://en.wikipedia.org/wiki/WikiLeaks>> accessed 28 May 2020

⁶ Michael Ray, 'WikiLeaks', *Encyclopaedia Britannica* (edn 2020) <<https://www.britannica.com/topic/WikiLeaks>> accessed 28 May 2020.

⁷ The Constitution of the Democratic Socialist Republic of Sri Lanka 1978, Art.14(1)(a).

⁸ <https://twitter.com/mangalalk/status/1250324245474754560?lang=en>.

has acquired through part of their governmental digital campaign which is led by individuals & non-state actors by way of creating digital content such as videos, hashtags, blog post related to images, landmarks information etc according to their interests and passion as well as pointing out the location as State in online maps in order to acknowledge the international community positively about the existence of Kosovo's identity as an independent State while allowing the international community to generate it in digital platform instead of high costly diplomatic methods to gain state recognition. Moreover, it is crystal clear that means of digital diplomacy is strong enough to create a revolutionary footprint either by building up a nation or destroying a nation. Thus, it is necessary to provide effective recommendations to address the said issue under the concept of defamatory publications to avoid adverse interferences to the national security.

B. Indian legal regime relating to defamation and digital diplomacy

India is a country which recognizes criminalizing defamation in their Penal Code. The main argument was whether defamation should be considered as a wrong which falls under the category of civil, criminal or both.⁹ Section 499 of the Indian Penal Code¹⁰ provides for defamation which states that person is said to defame another whoever by words spoken or intended to be read or by signs or visible representations makes or publishes any imputation relating to any person intending to harm or knowing or having reason to believe that the imputation will harm the reputation of the person. Further, the said section provides for some exceptions which express that it is not defamation to impute truth which public good

requires to be made or published opinion expressed in good faith respecting the conduct of a public servant and touching any public question and publication of true reports of courts. Section 500 of the Penal Code¹¹ on the other hand provides for the punishment for defamation which states that whoever defames another shall be punished with simple imprisonment for a term which may extend to two years or with fine or with both highlighting that criminal defamation has been recognized in India.

Article 19(1) (a) of the Indian Constitution¹² guarantees the right to freedom and expression of citizens of India. Simultaneously, Article 19(2) confers certain restrictions to be imposed on all fundamental rights including freedom of speech and expression. These restrictions relate to "interest of sovereignty and integrity of India, security of state and friendly relations with foreign states."¹³ Furthermore, according to Section 199(1) of the Indian Code of Criminal Procedure,¹⁴ "no court shall take cognizance of an offence punishable under Chapter XXI of the Indian Penal Code except upon a complaint made by a person aggrieved by the offence."¹⁵ Further, as per the Section 199(2), if an offence falling under Chapter XXI of the Indian Penal Code is committed against a person who is the President, Vice-President, Governor of a State, Administrator of a Union territory or a Minister of the Union or of a State or of a Union territory, or any other public servant employed in connection with the affairs of the Union or of a State regarding his conduct in discharge of his public functions, a Court of Session may take cognizance of such offence upon a complaint in writing made by the Public Prosecutor.¹⁶

In *Subramanian Swamy v The Union of India*¹⁷, several petitioners were politicians who were charged with criminal defamation. The issues

⁹Chaudhary, P., *Defamation in India - IPC Section 499/500 vs Freedom of Speech*, (edn 2017) <<https://www.clearias.com/defamation-freedom-speech/>> accessed 29 May 2020.

¹⁰ Indian Penal Code Act No.45 of 1860.

¹¹ *ibid.*

¹² The Constitution of India, 1950.

¹³ *ibid.*

¹⁴ The Indian Code of Criminal Procedure, 1973

¹⁵ *ibid.*

¹⁶ *ibid.* Section 199(2).

¹⁷ Writ Petition (Criminal) No.184 of 2014.

that were discussed in this case were whether Sections 499 and 500 of the Indian Penal Code is in line with Article 19(2) of the Constitution and the issue of supremacy over larger public interest over individual interest. Here, the Supreme Court was of the view that it was a reasonable restriction on the right to freedom of expression while further emphasizing that the Penal Code provisions are not disproportionate. Additionally, the court held that proportionality and reasonableness of a restriction should not be considered from the viewpoint of the person upon whom the restrictions are imposed but considering the viewpoint of the interest of the general public.

Apart from this, recently, the 'Times of India' has reported an article relating to criminal defamation which stated that a Delhi Court has directed the Chief Minister Arvind Kejriwal to appear before it for a complaint filed against him for retweeting a defamatory video against the Prime Minister Narendra Modi.¹⁸ However, this case was brought in the perspective of maintaining political stability.

When analysing the above facts, it is clear that if an issue relating to political interest arises due to a defamatory statement in digital diplomacy, Indian jurisdiction has a remedy to resolve it through criminal defamation. Therefore, this could be considered as a merit, because it is better to have at least something rather than not having any mechanism to address the issues arising in the digital platform. Yet, the true aim should be to maintain the national interest and the national security rather than protecting the individual interests which are beneficial for their own survival.

Moreover, it is important to identify the locus standi in relation to criminal defamation cases. As per Section 199 of the Code of Criminal

¹⁸(2019) 'Defamatory video: Delhi CM Arvind Kejriwal asked to appear before court on December 13', *The Times of India*, 30th November <<https://timesofindia.indiatimes.com/city/delhi/defamatory-video-delhi-cm-arvind-kejriwal-asked-to-appear-before-court-on-december-13/articleshow/72308358.cms>> accessed 30 May 2020.

Procedure, no court shall take cognizance of the offence except upon a complaint made by the aggrieved person. This is because 'aggrieved person' does not mean the person defamed. And according to Section 499 of the Penal Code, any person whose reputation has been damaged can sue for defamation. Here, 'any person' may refer to a single individual, an association or collection of persons or a company. Therefore, it seems that locus standi can be brought in light of the concept of Public Interest Litigation. However, when analysing the decided cases in India, it is clear that this depends on the facts and circumstances of each case. *Maulik Kotak v State of Maharashtra*¹⁹ demonstrates this. In this case it was held that a complaint for defamation should be filed by the aggrieved person and by the person defamed and not by any other person who was not defamed.

C. Sri Lankan legal regime relating to defamation and digital diplomacy

Article 14(1)(a) of the Sri Lankan Constitution guarantees "the freedom of speech and expression including publication to every citizen in Sri Lanka."²⁰ As the Indian Constitution has imposed certain restrictions on the freedom of speech and expression, the Sri Lankan Constitution has also imposed certain restrictions with regard to freedom of speech, expression and publication under Articles 15(2) and 15(7) of the Constitution.²¹ According to Article 15(2), Article 14(1)(a) shall be subjected to certain restrictions in the interest of racial and religious harmony or in relation to parliamentary privilege, contempt of court, defamation, incitement to an offence.²² Further, according to Article 15(7), there are some restrictions imposed on Article 14 which includes the interest of national security and public order. And it should also be noted that the Constitution, being the supreme law of the

¹⁹ Criminal Writ Petition No.428 of 2007.

²⁰ The Constitution of the Democratic Socialist Republic of Sri Lanka, Art.14(1)(a).

²¹ *ibid*.

²² *ibid* Art.15(2).

country, should be given priority over all other laws of the country. Therefore, every publication should be subjected to the limitations prescribed in the Constitution, even though new trends have emerged as a result of new technological developments.

Computer Crimes Act No. 24 of 2007 was introduced to identify computer crimes, procedure for investigation and prevent computer crimes and matters connected thereto. This Act covers offences relating to hacking in digital platforms.²³ Additionally, Section 6 of the said Act deals with computer crimes committed against national security, public order & national economy. However, it does not extend to cover defamatory statements published in digital platforms, specifically activities which generate the digital diplomacy against the interest of the State as well as national security of the State. It could be argued that even though civil actions can be pleaded by way of delictual actions for defamation, it is not sufficient for instances which involve national interest and national security of the state. This has led certain issues to go unaddressed since there is no provision on criminal defamation in the Penal Code at present²⁴, even though earlier there were provisions on criminal defamation under Chapter XIX of the Penal Code 1883 which was titled as 'OF DEFAMATION', particularly which was identical to the defamation Chapter in the Indian Penal Code. Section 479 of this Chapter provided for the offence of defamation whereas Section 480 provided for the punishment for defamation. In the case of *Sinha Ratnatunga v The State*²⁵ it was held that a statement may be defamatory, even though the readers do not believe it to be true and it was further held that the Penal Code makes the requisite criminal intention or knowledge an additional ingredient for defamation. This emphasizes the situation prior to 2002 where criminal defamation was

part of the Penal Code. Thus, the amendment which repealed the defamation chapter in the Penal Code has created a gap in the existing legal system that needs to be addressed to secure national security while maintaining the inter-state diplomatic relationships strongly through digital platforms.

IV. OBSERVATIONS AND RECOMMENDATIONS

Therefore, when analysing the above facts it can be observed that defamatory statements published in digital platforms which relate to the interest of nation and inter-state relationships is not widely addressed by the Computer Crimes Act and the Penal Code does not stipulate any provision for defamation, even though the Constitution contains provisions on restrictions imposed on protection against defamatory statements which can affect the national interest and national security.

Consequently, following recommendations were made after identifying loopholes in the law while comparing the Sri Lankan and the Indian legal systems.

Incorporate a clear and a wide definition of criminal defamation than what is included in the Indian Penal Code to the Sri Lankan Penal Code which is not inconsistent with the supreme law of the country: the Constitution, because if an overlap arises between the two it will affect the Rule of Law and the public interest. Thus, it would be effective to include the phrase "national security" to the proposed provision to give prominence to address the issues specifically arising with regard to national security through digital diplomacy.

Re-introduce or propose an amendment to the Penal Code which makes everyone liable for criminal defamation irrespective of their status or the position, specifically with regard to issues relating to national interest and inter-state relationships.

According to Section 199(2) of the Indian Code of Criminal Procedure, it could be identified that persons holding higher offices of the

²³ Section 3 of the Computer Crimes Act No. 24 of 2007.

²⁴ This was repealed by the Penal Code (Amendment) Act No. 12 of 2002.

²⁵ [2001] 2 Sri LR 172.

government have been given immunity from making defamatory contents in digital platforms which affect the national security and inter-state relationships. Therefore, it would be effective to impose liability regardless of their higher positions. If not it could be considered as them having unequal access to law which is inconsistent with the Constitutional provisions and would be a violation of the concept of Rule of Law.

Unlike in the Indian situation, it would be effective to authorize Public Interest Litigation in order to allow a person to represent a community with regard to defamatory issues arising in relation to national security, specifically in digital platforms, because it is the obligation of every citizen "to uphold and defend the Constitution and the law"²⁶ and "to further the national interest and to foster national unity."²⁷

Communication professionals can be hired by the government officials to run their social media accounts on behalf of them while maintaining confidentiality.

Social media training courses can be conducted effectively to educate diplomats to protect national security.

The standards of the contents of Twitter and Facebook pages should be maintained regularly to overcome national security issues that might arise relating to digital diplomacy.

Increase judicial activism in Sri Lanka in a manner which will allow the judiciary to play an active role in interpreting issues falling under criminal defamation.

V. CONCLUSION

The study reveals that criminal defamation is not a part of the Sri Lankan legal regime after it was repealed by the Penal Code (Amendment) Act No.12 of 2002. Even though the Computer Crimes Act was brought because provisions of

the Penal Code was inadequate to facilitate the emerging new trends of offences with regard to unauthorized access to computers, the Computer Crimes Act has not extended to cover the defamatory acts in digital diplomacy in order to safeguard the national security and inter-state relationships. Therefore, it would be effective to re-introduce criminal defamation to the Sri Lankan legal system in a way that issues arising out of digital diplomacy can also be addressed.

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²⁶ The Constitution of the Democratic Socialist Republic of Sri Lanka, Art. 28(a).

²⁷ *ibid* Art. 28(b)

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