

A STUDY ON SOLITARY CONFINEMENT AS A PUNISHMENT

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ABSTRACT:

In India there are numerous thorough disciplines gave by the court to the captured. Yet, the capital detainment of capital punishment is the best most extreme disciplines. The piece of the death penalty is the solitary confinement. Solitary confinement is a type of detainment in which a prisoner is detached from any human contact, frequently except for individuals from jail staff, for 22– 24 hours per day, with a sentence going from days to decades. It is for the most part utilized as a type of discipline past imprisonment for a detainee, typically for infringement of jail directions. Be that as it may, it is likewise utilized as an extra measure of security for powerless prisoners. On account of detainees at high danger of suicide, it can be utilized to forestall access to things that could enable the detainee to self-hurt. In any case, this sort of disciplines is extremely thorough. The physiological impact of this discipline influence the brains of the rebuffed people. Later there is not any more solitary confinement gave despite the fact that the individual submits an intense activity. There are numerous explanations behind the execution and the dismissal of the solitary confinement. The legal procedural execution is additionally so genuine. So as to investigate this sort of discipline under law, an exploration has been made. Frame this paper we can discover something about the solitary confinement.

Keywords are solitary confinement, protection, punishment, impacts , illness, mental.

INTRODUCTION:

Solitary confinement is a sort of detainment inside which a detainee is disengaged from any human contact, more often than not except for individuals from imprison specialists, for 22–

24 hours day by day, with a sentence beginning from days to decades. It is for the most part used as an assortment of social control on the far side confinement for a hostage, normally for infringement of jail rules. Be that as it may, it's also utilized as an additional live of assurance for powerless prisoners. Inside the instance of detainees at high danger of suicide, it might be utilized to stop access to things that would allow the prisoners to self-hurt. A sentence of solitary confinement can be dispensed just for offenses under the correctional code. The discipline can be granted for offenses under extraordinary violations (Shahzad Bokhary, 1970). Solitary confinement uncovers what the decimation brought by the torment of solitary confinement enlighten us regarding being human. It contends that detachment uncovered the judicious with others on which our reality as sense making animal depends.

Solitary confinement is beyond the political violence ([THE EXPERIENCE OF SOLITARY CONFINEMENT:](#)). Solitary confinement when can be ordered. The sentence of solitary confinement is a mode of undergoing the sentence of rigorous punishment. It is not a substantive sentence by itself (Hari Singh Gour & Shashi Kant Verma, 1961). Solitary confinement is very rare and employed for serious and dangerous offenders. Although the death penalty is one of the aforementioned six categories of punishments, it is infrequently applied in the practice of the judicial punishment under Indian Penal Code. ([Polizzi 2017](#))

There are many new improvements in the punishments and new amendments of sections adding many changes in the kinds of punishment. To study anything relating their practice and demerits, it is necessary to take a study on the origin and the past flow of the practice of such punishment. Here this paper attempts to study about why do the solitary confinement should not be given, and why do the practice of such punishment is restricted and not in use. This paper even tries to study about solitary confinement, to analyse the effects, impacts of the solitary confinement, to compare the solitary confinement as a punishment in the present and the past cases in the Indian judiciary.

Origin of solitary confinement :

In 1829, the first experiment in solitary confinement within the United States begins at the Eastern State Penitentiary in Philadelphia. It supported a Quaker belief that prisoners isolated

in stone cells with solely a Bible would use the time to repent, pray and realise their faults and mistakes. However several of the inmates go insane, commit suicide, or are not any longer able to operate in society, and also the follow is slowly abandoned throughout the upcoming years. ([Guenther 2013](#))

Solitary confinement :

Solitary confinement is the act of separation of individuals in the closed cells for 22-24 hours per day, for all intents and purposes free of human contact for timeframes going from days to years. Few detainee framework utilize the expression "solitary confinement" for alluding to jail of isolation or position in limiting house. The quantity of individuals under solitary confinement in US is hard to decide. They absence of dependable data and inadequacies in information gathering thoughts constituting solitary confinement. This discipline is given under area 73 and 74 of Indian Penal code .

Terms in solitary confinement depend on charges that are required, settled and upheld by jail authorities with next to zero outside oversight. Numerous jail frameworks have a hearing procedure, however hearings are regularly spur of the moment. Jail authorities fill in as prosecutors, judges and juries, and detainees are seldom permitted legitimate portrayal. ([Guenther 2013](#); [Polizzi 2017](#))

Limitations of solitary confinement :

In capital punishment a sentence of isolation, such constraint should for no situation surpass fourteen days on end, with interims between the times of single of not less period than such periods; and once the detainment granted might surpass three months, the lone should not surpass seven days in anybody month of the full detainment granted, with interims between the times of singular of not less span than such periods.

I) 3 months in the entire (Section 73).

(ii) 14 days on end with interims of at the very least 14 days.

(iii) 7 days in multi month with interims of under 7 days if the detainment granted is over 3 months (Section 74).

The punishment may exceed as follows :

Not more than	(i) 6 months	1 month of the punishment of solitary confinement
	(ii) 1 year	2 months of the punishment of solitary confinement
More than	1 year	6 month of the punishment of solitary confinement

United States with regards to solitary confinement :

Solitary confinement of detainees in United States passes by the quantity of names—disengagement, SHU (exceptional lodging units), authoritative isolation, supermax penitentiaries, the opening, MCU (administration control units), CMU (interchanges administration units), STGMU (security danger aggregate administration units), deliberate or automatic defensive guardianship, extraordinary units such as Confinement should be behind steel door for 22 to 24 hours each day

- Many limited and restricted contact with other human beings and their family members
- No phone calls and rare non-contact family visits
- Very much limited to access to rehabilitative training or programs or educational programming ([Arrigo and Bullock 2008](#))
- Rarely inadequate medical and mental health treatments and awareness for the prisoners
- Restricted and very rare reading materials provided and personal property
- Physical torture such as restraint chairs, forced cell extraction
- “No common beating torture,” such as sensory deprivation, permanent bright lighting, extreme temperatures, and forced insomnia
- Chemical torture, such as stun grenades and stun guns

Beginning of the 1970s, imprison managers at the government, state, and nearby level have lied on the expanding rate on separation and isolation of the detainees to control the detainees, for example, men, ladies, and youth in their authority. In 1985, there were a higher specialist's

modest bunch control techniques over the region. In excess of 40 states have super-greatest security—or "supermax"— offices primarily intended to have the general population in the long term disconnection in the prisoners.

Number of individuals under isolation in United States

There were in excess of 80,000 men, women, and youngsters in isolation in each jail over the United States, as per the Bureau of Justice Statistics ([Eastaugh 2017](#)) Nearly every state uses some form of solitary confinement but there no proper system to inform or maintain any data on the number of prisoners who are under the solitary confinement. Prisoners are often confined for months or even years in the prison. As with the overall prison population, people under he solitary confinement is always maintained secretly.

Reasons for placing the people under solitary confinement

Prisoners can be placed in isolation under the solitary confinement for many reasons, from serious infractions, such as preventing them from fighting with another inmate, to minor ones, like talking back to a guard or getting caught with a pack of cigarettes. ([Guenther 2013](#); [Polizzi 2017](#); [O'Donnell 2013](#)) Other times, prisoners are thrown into the solitary confinement for not breaking any rules at all. Prisons have used solitary confinement as a tool to manage gangs, isolating people for simply talking to a suspected gang member. Prisons have also used solitary confinement as retribution for political activism.

The effect of the long term solitary confinement

Many prisoners are released directly to the streets after the isolation of years. Numerous studies had expressed the physiological effects of the solitary confinement , which can produce the symptoms, such as:

- Visual and auditory hallucinations
- Hypersensitivity to noise and touch
- Insomnia
- Uncontrollable feelings of rage and fear
- Distortions of time and perception

- Increased risk of suicide
- Post-traumatic stress disorder (PTSD)

Prison isolation correctly matches with the that of torture as mentioned in several international human rights conditions and thus constitutes a violation of Human Rights. The United Nations convention defines the term torture as a kind of the state-punishment act “by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person” for information, punishment, intimidation, or for a reason based on discrimination. ([Gangrade](#))

Since the 1990s, the U.N. Board of trustees Against Torture has more than once censured the utilization of solitary confinement in the U.S. In 2011, The United Nations Submitted a provide details regarding torment cautioning that solitary confinement can add up to torment or remorselessness, barbaric or corrupting treatment when it is given as a discipline in the legal. End of solitary confinement in US penitentiaries

Detainees and their relatives were well uncovering the torment and the savagery rehearse inside the jail in the term of solitary confinement. A few associations, for example, United States and AFSC have likewise went with in the overview of the act of the solitary confinement. Politicians and other open identities, for example, previous President Obama, Supreme Court Justice Anthony Kennedy, and Pope Francis have reported their perspectives against the long haul solitary confinement, while the U.S. Senate has called for changes from the U.S. Department of Prisons. ([Metzner and Fellner 2010](#)) In recent years, several states have re examined the policy of practicing the inhuman punishment of solitary confinement, but India is also in the practice of abolishing this shameful practice in the India. Prison isolation must end for the safety of communities, to respect our responsibility to follow international human rights law, to take a stand against torture wherever it occurs, and for the sake of our common humanity against cruelty and inhumanity.

Methodological considerations of the researches :

In the matter of research, there are two methods to take under this topic. The researches were more restricted in this topic. Though it is restricted it is taken under two methods. One method is with the volunteer participation of the people and the other is with the inmates in solitary confinement. The people who are in the volunteer participation may be under the

pressure or may be influenced by the money and power. They may express anything extravagantly regarding their known facts. The survey with the inmates in solitary confinement is also in risk because the answer from them anything against the solitary confinement or the prisoners may increase their time period of solitary confinement or it may further develop the mental stress and the illness problem to the prisoners. In many researches which were already conducted by many researchers, the members for the survey were even chosen by the prison officers only. One another idea to study the inmates externally by using the medical records , cameras but it will also be difficult to conclude anything without any proper questionnaire or any kind of interview.

Indian landmark cases referring solitary confinement

- **Unni Krishnan & Ors. v. State of Andhra Pradesh & Ors., 1993 SC**

As per the order from Supreme Court “Right against solitary confinement” is one of the rights that falls under Article 21 (Right to Life) of the Constitution. In this case, the Apex court declares that the right against solitary confinement falls under the Right to Life in Article 21 of the Indian Constitution.

- **Sunil Batra v. Delhi Administration, 1979 SC**

Supreme Court clearly explained that the solitary or single cell confinement is prior for the rejection of the mercy petitions aslike the other cases by the President of India, and that was unconstitutional. In this case the the solitary confinement was given under the section 30 of sub class (2). Here the Supreme Court says that the results of long solitary confinement are disastrous to the physical and mental ill health for those who are subjected to it. In this case the court declares that the solitary confinement is abolished in UK but it was still in practice in U.S.A. Here they declares there are some practice of solitary confinement.

- **T.V.Vatheeswaran V State of Tamil Nadu SC 1983**

In T.V Vatheeswaran case, which the learned Senior Counsel for the petitioner and the learned Amicus Shri Ram Jethmalani were placed, the two-Judge Bench considered whether the appellant , who was convicted for the offence of murder and was sentenced to death in January 1975 and was also kept in solitary confinement for 8 years along with the commutation of the

death sentence. The Court already faced the consideration of the appellant's plea by making many observations. ([Reiter and Koenig 2015](#))

Other Indian cases referring solitary confinement

- Devender Pal Singh Bhullar vs state of Delhi
- Rajendra Prasad Vs State of Uttar Pradesh
- Unni Krishnan J.P and others Vs State of Andhra Pradesh
- Mary Ram Vs Union of India and others
- A.K.Gopala Vs State of Madras
- P.Rathinam Vs Union of India and others

Constitutional arguments made against solitary confinement

1. It violates the basic concept of common natural human dignity
2. It denies the basic human rights of the people
3. It causes many significant mental illness and physical pain and suffering
4. It is unnecessary in many of the cases

Arguments made in favour of solitary confinement

1. It is necessary to prevent some rare cases of suicides
2. It is an additional measure followed for the protection of an inmate from other inmates as it includes the social isolation in the prison.
3. In case of violations against the prison regulations, it can be given to some extent of punishments.

Article 21 with reference to solitary confinement

Article 21 of Indian constitution in 1949 :

This article deals with the Protection of the life and the personal liberty. No person shall be deprived of his life or personal liberty except according to procedures established by law.

On January 19, 1975 when the Sessions Judge gave the sentence of death, the prisoner was kept in the solitary confinement contrary to the decision of the Court in Sunil Batra v. Delhi

Administration¹ 1978 4 SCC 494. Before the punishment, he was a under remand for two years. On these facts, the argument advanced in the Court on the side of the prisoner was that taking away his life after keeping him in jail for 10 years, and almost eight years of was spent illegally in the solitary confinement is a violation of the fundamental rights guaranteed by the **article 21 of the Indian constitution**. ([Sastry 2005](#))

Prisoners Rights :

Even every inmates have certain common basic rights that were protected by the U.S. Constitution. This article explains their rights, including the rights to be free from the “cruel and unusual punishment” and many serious punishments. Prisoners were given with certain rights to some extent as a normal human being when they are inside the prison. These rights are provided in the Constitution of India, the Prisons Act, 1894 . Prisoners are the persons and they have some rights and do not lose their common constitutional rights. In the case of **State of Andhra Pradesh v Challa Ramkrishna Reddy**, it was said that the prisoners are entitled to all his fundamental rights unless his liberty has been constitutionally reduced. The Supreme Court said that a prisoner, whether he is a convict, under-prison does not cease to be a human being, he enjoys all his fundamental rights provided by the Constitution of India including the right to life guaranteed by the Constitution. ([Gilani 2009](#))

Article 14 of the Constitution of India says that the State shall not deny to any person with their equality before law or the equal protection of laws within the territory of India. Thus Article 14 should be treated as such with its constituents . The article 14 is very useful for all citizens and basis for the prison authorities to determine the variety of prisoners in the prison.

Article 19 of the Constitution of India granted almost six freedoms to the all citizens of India. Among all these freedoms certain given freedoms are not allowed to enjoy by the prisoners

¹ <https://www.casemine.com/judgement/in/5609ac09e4b014971140dd8f>

because of the nature of these freedoms. But the “freedom of speech and expression”² and “freedom to become member of an association”³

Article 21 of the Constitution of India says that No person shall be deprived of his life or personal liberty except according to procedure established by law. This Article stipulates two concepts i.e., right to life and principle of liberty. By Article 21 of the Indian Constitution it is clear that it is available not only for the common people but also to those people behind the prison. ([Sastry 2005](#); [Palmer 2014](#)) Following are the rights of prisoners provided under the Article 21 of the Constitution of India:-

- Right of inmates to have protective homes,⁴
- Right to have free legal aid,⁵
- Right for a speedy trial,⁶
- Right against the cruel and the unusual punishment,⁷
- Right of fair trial,⁸
- Right against the custodial violence and death incase in the police lock-ups or encounters,⁹
- Right to life with human dignity,¹⁰

² Article 19(1)(a) of the constitution of India.

³ Article 19(1)(c) of the Constitution of India.

⁴ Upendra Baxi v. State of U.P., (1983) 2 SCC 308.

⁵ M.H. Hoskot v. State of Maharashtra, (1978) 3 SCC 544.

⁶ Hussainara Khaton v. State of Bihar, (1980) 1 SCC 81.

⁷ Jagmohan Singh v. State of U.P., AIR 1973 SC 947.

⁸ Rattiram v. State of M.P., (2012) 4 SCC 516.

⁹ D.K. Basu v. State of W.B., (1997) 1 SCC 416.

Apart from the rights of prisoners Constitution of India, there are some other rights were also provided to the prisoners. They are as follows

- Right to meet their friends and to consult lawyer,¹¹
- Rights against solitary confinement, handcuffing & bar fetters and protection from torture,¹²
- Right to have paid reasonable wages in prison.¹³

Prisoner's Rights under the Prisons Act, 1894

Prisons Act, 1894 is the first legislation formed in India regarding the prison regulation in India. This Act mainly focus on reformation of prisoners in connection with the rights given to the prisoners. Following Sections of the Prisons Act, 1894 are related with the reformation of prisoners:-

- Accommodation and sanitary conditions for prisoners,¹⁴
- Provision for the shelter and safe custody of the excess number of prisoners who cannot be safely kept in any prison,¹⁵
- Provisions relating to the medical examination of the prisoners by a well qualified Medical Officer,¹⁶

¹⁰ Jeeja Ghosh v. Union of India, (2016) 7 SCC 761.

¹¹ Sunil Batra v. Delhi Administration, AIR 1980 SC 1579.

¹² Prem Shankar Shukla v. Delhi Administration, AIR 1980 SC 1535.

¹³ People's Union for Democratic Rights v. Union of India, AIR 1982 SC 1473.

¹⁴ Section 4 of the Prisons Act, 1894.

¹⁵ Section 7 of the Prisons Act, 1894.

¹⁶ Section 24(2) of the Prisons Act, 1894.

- Provisions relating for the separation of prisoners like containing the female and male prisoners, civil and criminal prisoners and convicted and undertrial prisoners,¹⁷
- Provisions relating to the treatment of undertrials, the civil prisoners, parole and temporary release of prisoners.¹⁸

In 2016, the Parliament has passed the Prisons (Amendment) Bill, to amend the Prisons Act, 1894 with a motive to provide protection, rehabilitation and the welfare of the prisoners.

Effects and impacts of solitary confinement

There are many effects due to the solitary confinement as a practice of punishment in the judiciary. There are psychological illnesses and physical illness suffered by the prisoners under the solitary confinement. The researches made by many researchers clearly stated that the prisoners who are under solitary confinement has been affected by Visual and hearing hallucinations, Hypersensitivity to noise and touch, Insomnia and many other sleeping sickness, Uncontrollable feelings of fear and death , increased rate of suicide by many deprivations, dangerous perceptions and many traumatic diseases and disorders.

In a research, Andersen (2000) interviewed almost 133 prisoners under solitary confinement and 93 from the non solitary confinement. He conducted surveys with many questionnaire and took the participation of the prisoners. [\(Sastry 2005\)](#). The results shows that the mental illness is more with the people in the solitary confinement as the punishment given for the crime. And the normal prisoners were not that much mentally affected. Andersen in his study in 2000 first used the term 'disorder' which means the problems including violent impulses, chronic tiredness, complete breakdown of the self identity, suicidal tendencies and developing communication problems. These effects were all taken into the researches for the efficient conclusion regard the solitary confinement.

¹⁷ Section 27 of the Prisons Act, 1894.

¹⁸ Sections 31 and 35 of the Prisons Act, 1894.

Contrasting effects of solitary punishment

Contrary to the researcher's effects by the solitary confinement which is usually given as there are many psychological and mental illness to the prisoners, Samantha San in the study of Psychological Effects of solitary confinement On Prisoners in 2014 studied about the solitary confinement. This study compares the punishment of solitary confinement with the other imprisonment of the prisoners to find out the health issues between them. That study was to check whether solitary confinement prisoners have mental illness by taking survey all around the world. The research made by Zinger and Wichmann (2001) was made into reference. Though they tracked the people who are released from solitary confinement, there is no significant change in the health effects. ([Reiter and Koenig 2015](#)). Their health was good as other common prisoners. This was a complete contrasting research in the matter of health of solitary confinement. But there was one problem in that the participants was given only limited confidentiality and no more complete confidences. The inmates may be at risk and they were not at safest side.

Abolition of solitary confinement as punishment

A punishment is something which were given to the wrong doer to make them realise their mistake and faults. Those punishments should be given in such a way which should make the person not to do any wrong again. So the punishment should be learnable, it should not make the prisoners mentally and physically week and get affected with stress. So many people who undergone the punishment were requesting to cancel this kind of punishment. In order to abolish this punishment many researchers were stating their researches against the solitary confinement.

Broadsley and Scogin (1988 , P 279) also point out that the social isolation is the main cause for the negative mental health effects in single cell confinement. Brodsley experimented the effects by taking 69 prisoners and asked to complete Isolation Sentence-Completion Test was to study about the mental statement of the prisoners. In the research he found out that two – third of the prisoners have psychiatric syndrome, 45% of them were with the anxiety and 36% of them were with the chronic depression.

Danold O.Hebb (1951) also wanted to express how the sensory has been affected by the imprisonment especially Solitary Confinement. He also proved that the their sensory were affected after the solitary confinement. Many researchers suggest that the solitary confinement has bad ill effects on the prisoners.

In Tamil Nadu there are no people in the prison kept under the solitary confinement. They took into the consideration of the illness, psychological impacts and the mental effects that the prisoners suffer due to that kind of ill-treatment.

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