
FOREST LEGISLATION, TRIBAL MARGINALISATION, AND THE STRUGGLE FOR LAND RIGHTS: THE CASE OF PVTGS IN THE NILGIRIS

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ABSTRACT

From historical times, tribal communities have been the indigenous inhabitants of forest land and custodians of resources. However, with the migration and urbanisation, the land and resources of the tribal's began to be encroached upon by the governments and big corporations, which undermined the rights of the tribes

By employing a doctrinal research approach, the study explores the history of the tribal land and resource rights of PVTGs in the Nilgiris and how the challenges began to arise when their rights to their ancestral lands and resources were encroached upon and undermined by British colonial forest policies, which continued after India's independence through laws such as the National Forest Policy of 1952 and the Wildlife Protection Act, 1972. However, despite the enactment of protective frameworks, these tribal groups are still face obstacles in reclaiming and using their land and resources in forests because of a lack of awareness about the laws, bureaucratic inefficiencies, and ongoing state- and corporate-backed encroachment on their land.

By studying forest governance from colonial times to post-independence, this study argues that the marginalisation of PVTGs in the Nilgiris is due to legislative and structural impediments. Even though statutes make a transformative legal shift for the tribes, their implementation remains fraught with bureaucratic delays, legal obstacles and inadequate accountability. What is needed is to ensure transparent implementation of Statutes such as the Forest Rights Act, 2006, community participation with Gram Sabha, legal literacy amount PVTGs and ethical engagement by civil society organisations.

Introduction

The indigenous communities have been serving as protectors of forests, living in harmony with nature and preserving its resources. However, they have been facing several challenges with colonial governance in India, urbanisation and policy frameworks, particularly those classified as Particularly Vulnerable Tribal Groups (PVTGs).

The Nilgiris biosphere was established in the year 1996 and is home to 16 tribal communities, which span Tamil Nadu, Kerala and Karnataka. It is home to several tribes, such as Todas, Irulas, and Kotas, who have been facing threats to their land and resource rights because of several factors.

The plight of PVTGs in the Nilgiris stems from historical exclusion, beginning with colonial forest policies that prioritised revenue generation. Post-independence laws on forest perpetuated the restrictive practices of the colonial laws, further alienating PVTGs. Conservation initiatives, while critical for biodiversity, have also sidelined the rights and needs of these communities, creating conflicts between ecological preservation and human livelihoods. The bureaucratic inefficiencies, encroachment by corporations, and lack of awareness of protective legislation, such as the Forest Rights Act of 2006, increased the challenges.

Addressing these challenges requires a holistic approach that balances ecological conservation with the recognition and protection of the rights, traditions, and livelihoods of the PVTGs in the Nilgiris Biosphere Reserve.

Overview of PVTGs

India has a considerable tribal population dispersed throughout its numerous states. Some tribal groups are endangered and have low socioeconomic indicators. The Dhebar Commission (1960-1961) reported that within the Scheduled Tribes, there was a disparity in the rate of development due to low birth rates and high death rates. A Scheduled Tribes subcategory was established during the fourth Five-Year Plan to identify groups deemed to be at a lower stage of development. A "Primitive tribal group" subcategory was created. This group's characteristics included a pre-agricultural way of life based on hunting and gathering, zero or negative population growth, and a very low degree of literacy¹. At the end of the Fifth Five-

¹ Ministry of Tribal Affairs, Government of India, *Overview of Primitive Tribal Groups (PTGs)* (2013).

Year Plan, 52 communities were classified as "primitive tribal groups," chosen based on suggestions from the state governments. Twenty groups were added at the end of the sixth five-year plan, two more were added in the seventh, and one more was added in the eighth, for 75 groups that were designated as PTG. The PTGs were renamed Particularly Vulnerable Tribal Groups (PVTGs) by the Indian government in 2006. These disadvantaged and archaic tribal communities had unique needs, demanding special support through government policies and initiatives.²

There are 25 PVTGs in five South Indian states, most of which are divided among multiple states. Kerala has five PVTGs (Cholanaiyakan, Kurumba, Koraga, Kadar, Kattunayakan), Karnataka has two (Jenu Kuruba, Koraga), and Tamil Nadu has six (Irula, Kattunayakan, Kota, Kurumba, Paniyan, Toda).³ Prominent tribal studies experts B.D. Sharma and Surajit Sinha discuss the characteristics that can be used to identify PTGs. Tribal communities with pre-agricultural technology were one of the seven characteristics; small communities, with the population of divided clusters not exceeding "a few thousand"; extremely low literacy levels; poor socio-economic connection with urban centres and settled peasants; distinctive linguistic and cultural traits; low fertility; declining populations, and an unbalanced age structure; and poor nutritional levels were the other two.⁴ Additionally, the Ministry of Tribal Affairs has identified four key characteristics of backwardness: low literacy, a population that is stable or shrinking, a subsistence level of economy, and a pre-agricultural level of technology.⁵ The characteristic to identify tribes is still unclear, creating confusion as the tribes that are identified as PVTGs in one state are not classified as PVTGs in another. In Tamil Nadu, the 'Paniyan' tribe is considered as PVTG, while the same tribe is not considered as PVTG in Kerala and Karnataka.⁶

The biosphere was established in the year 1996 and is home to 16 tribal communities across the states of Karnataka, Kerala and Tamil Nadu.⁷

While evaluating the status of PVTGs in these regions, three interconnected characteristics

² A.K. Singh, *Particularly Vulnerable Tribal Groups (PVTGs)*, *Geo-Analyst* 24, 25 (Dec. 2017).

³ Hebbar, R. (2021). Particularly vulnerable tribal groups in South India: From "backwardness" to "poverty." *India International Centre Quarterly*, 48(3/4), 309–320.

⁴ A. SENGUPTA & O. GOYAL, *THE WORKING OF THE INDIAN CONSTITUTION* (1st ed., Routledge 2024).

⁵ Ministry of Tribal Affairs, Government of India. (2021). *Annual report 2020–2021*. Government of India.

⁶ Hebbar, R. (2021). Particularly vulnerable tribal groups in South India: From "backwardness" to "poverty." *India International Centre Quarterly*, 48(3/4), 309–320.

⁷ A. SENGUPTA & O. GOYAL, *THE WORKING OF THE INDIAN CONSTITUTION* (1st ed., Routledge 2024).

come to the fore: their historical affiliation with the mainstream and the structural factors that contributed to their marginalisation. One problem is that local tribal populations' cultural and economic interdependence has been disrupted by the conservation agenda, which has frequently forced them out of their habitat. Second, the plantation economy's widespread presence and detrimental effects on nearby indigenous people make up the second characteristic. Third, the widespread nature of untouchability and caste-based discrimination against some PVTGs.

Modern Struggle for PVTGs in Nilgiri Biosphere

One of the primary challenges faced by PVTGs is the alienation from their traditional lands and resources. Historically, colonial forest policies disrupted indigenous land-use patterns by designating vast forest areas as government reserves, restricting tribal access. Post-independence forest laws, such as the Forest Conservation Act of 1980, further perpetuated exclusionary practices. Even the Forest Rights Act (FRA) of 2006, which aimed to restore rights to forest-dwelling communities, has faced challenges in its implementation.⁸

Environmental conservation policies also pose significant challenges. While these policies are designed to protect biodiversity, they often undermine the traditional rights of PVTGs. For instance, the creation of protected areas in the Nilgiris, such as wildlife sanctuaries and national parks, has led to restrictions on hunting, foraging, and shifting cultivation—practices integral to PVTG livelihoods.⁹ This has not only disrupted their economic activities but also eroded their cultural practices tied to the land.

Health and education are additional areas of concern. Access to healthcare services remains limited in remote tribal regions of the Nilgiris. Malnutrition, lack of clean drinking water, and poor sanitation contribute to high morbidity and mortality rates among tribes.¹⁰ Similarly, educational opportunities are inadequate, with low enrolment and high dropout rates among tribal children. The lack of culturally relevant curriculum and language barriers further alienates tribal students from the education system.

⁸ Bandi, M. (2014). Forest Rights Act: Towards the end of struggle for tribals? *Social Scientist*, 42(1/2), 63–81.

⁹ Hebbbar, R. (2021). Particularly vulnerable tribal groups in South India: From “backwardness” to “poverty.” *India International Centre Quarterly*, 48(3/4), 309–320.

¹⁰ Sarap, K. (2017). Erosion of access to resources, poverty and public action in the tribal belt of central India. *Sociological Bulletin*, 66(1), 22–41.

Socio-cultural challenges, such as the erosion of traditional knowledge systems, also threaten the identity of PVTGs. Modernisation and integration into mainstream society have led to the loss of indigenous languages, rituals, and ecological knowledge. For instance, the Todas, who are known for their intricate embroidery and temple architecture, now face difficulties in passing on these traditions to younger generations amid external cultural influences.¹¹

Forest Legislation and Tribal Marginalisation during Colonial Rule

The downgrading of tribal rights related to PVTGs began with the colonial policies imposed by the British in India. The British aimed to carry out the wealth of India to England, which was very much visible through their policies during their rule in India. Their focus was on the commercial extraction of the forests rather than protecting and preserving the rights of local communities.

With the increase in their foothold over India, the British established the Forest Department in 1864 and the Indian Forest Service in 1867, where their primary goal was to regulate the resources and lands of the forests to extract forest resources.¹²

The first legislation regarding forests, the Indian Forest Act of 1865, significantly impacted the land rights of tribal communities. The primary aim of this legislation was to consolidate control over forest resource management by the British.¹³ The act, for the first time, classified forests into different categories such as reserved, protected and village forests, allowing the state to regulate access. Before the enactment of the act, the communities had free access to the forest resources for their livelihood, activities like hunting, gathering fruits, and wood. The act effectively criminalised these practices, leading to restrictions on the tribal livelihood. This also led to economic hardship and the disruption of traditional practices for the tribals as the enforcement of the act stripped their rights, making them sometimes engage in illegal means to meet their basic needs and alienating them from their ancestral lands, which were declared as state property.

¹¹ Sundar, N. (2021). *Traditions in transition: PVTGs of the Nilgiris*. Routledge.

¹² Durga Lakshmi, S. (2023). A critical appraisal of livelihood rights of tribals with special reference to particularly vulnerable tribal groups of Tamil Nadu. *International Journal of Law, Education, Social and Sports Studies*, 10(2).

¹³ S. Jissa, British Forest Policy in India, in *Current Status and Challenges for Conservation and Sustainable Use of Biodiversity* 147 (S. Sheeba & N. Ratheesh eds., 2020).

In 1894, the British introduced the first formal Forest Policy, which was based on the recommendations of Dr Voelcker given in a report on 'Improvement of Indian Agriculture', 1893.¹⁴ The policy emphasised the commercial value of the forests, mainly focusing on the extraction of timber and other forest resources to generate revenue for the British Empire. The policy reinforced the idea of state control over forest resources, transforming forests into government property. It recognised the interdependence of forestry and agriculture, and the policy aimed to relax earlier restrictions on forest access for local agricultural communities. The Forest Policy 1894 laid down that permanent cultivation should come before Forestry and satisfy local needs at a competitive rate without regard to revenue.¹⁵

Decades later, the Indian Forest Act, 1927, was enacted with the primary objective of regulating forest produce and defining forest offences. The act sought to control the transportation and levy duties on forest produce, enhancing revenue for the government. The act detailed various offences related to the management of forests, prohibiting certain activities within reserved forests and establishing penalties for violations.¹⁶ The act alienated village communities from their traditional rights to access and utilise forest resources.¹⁷

These policies prioritised revenue generation for the British Empire, leading to the prohibition of shifting cultivation and grazing, restricting tribes' access to their ancestral land, and transforming forests into state property, which plunged the tribal population into poverty and disrupted their traditional ways of life, highlighting the exploitative nature of colonial rule.

Evolution of Forest Legislation Post Independence

The earlier administration's primary aim was to extract wealth from India, systematically reshaping the country's forests to serve the imperial interests. Forests were used for commercial purposes and resource extraction in England. Forestry was not seen as an important factor and was considered after agriculture. The acts like the Forest Policy Act of 1894, the Indian Forest Act, 1927, categorised forests into reserved, protected, and village forests, significantly

¹⁴ Ministry of Env't & Forests, National Forest Policy, Resolution No. 3-1/86-FP (1988) (India).

¹⁵ Durga Lakshmi, S. (2023). A critical appraisal of livelihood rights of tribals with special reference to particularly vulnerable tribal groups of Tamil Nadu. *International Journal of Law, Education, Social and Sports Studies*, 10(2).

¹⁶ Bijoy, C. R. (2017). *Forest rights struggle: The making of the law and the decade after*. *Law, Environment and Development Journal*, 13(2).

¹⁷ S. Jissa, British Forest Policy in India, in *Current Status and Challenges for Conservation and Sustainable Use of Biodiversity* 147 (S. Sheeba & N. Ratheesh eds., 2020).

curtailing the traditional rights of the tribal and local communities who were indigenous to the land. Their means of livelihood, like the practice of hunting, gathering, and shifting cultivation, were criminalised, disrupting their socio-economic and cultural systems. The alienation from ancestral lands plunged many tribal populations into poverty, forcing them to adopt illegal practices for their survival.

After India gained Independence, the first legislation regarding the Forests was the National Forest Policy of Independent India, 1952. Though the policy was the first such policy in India to recognise the tribal symbiotic relationship with the forests, it being highly focused on the protection, preservation and development projects in forests such as mining, industries, etc, did not provide much relief to tribes.¹⁸ The legislation maintained the importance of national interest over local demand, and the rights of tribes over the forest resources were sidelined.

The act effectively revoked the rights that were granted to the local populations, making them into concessions controlled by the state, which meant that even though the forests could be used by the local populations, they were now subject to the oversight of the state. To ensure that national interests are prioritised over local needs, the act emphasised that the forests, regardless of the ownership, will now be perceived as national assets by the state and those under the control of tribes.¹⁹ The national forest policy classified forests into four categories: **Protection Forests**- Designated to safeguard the environment by preventing soil erosion, conserving water resources, and maintaining ecological balance; **National Forest**- Earmarked for timber production and other commercial purposes to meet national economic needs; **Village Forests**- Intended to meet the local needs of rural communities, including fodder, firewood, etc; **Treelands**- Referred to forested lands that were outside government control, often privately owned or under local management.

Future policies like the Wildlife Protection Act 1972, and the Forest Conservation Act 1980 still did not bring a change in perspective of the government towards the land and resource rights of tribes in the forests, as the tribes were still considered outsiders and lawbreakers of their own forest land until the enactment of the Forest Policy 1988.

The forest policy of 1988 recognised that the conservation and livelihood of the forests are

¹⁸ Hari Charan Behera, *Forest Policy and Tribal Rights*, SSRN

¹⁹ Durga Lakshmi, S. (2023). A critical appraisal of livelihood rights of tribals with special reference to particularly vulnerable tribal groups of Tamil Nadu. *International Journal of Law, Education, Social and Sports Studies*, 10(2).

equally important. The government recognised the tribes and initiated a Joint programme which oversaw the integration of local communities for protection, management and conservation of forests through Joint Forest Management.²⁰

Joint Forest Management (JFM) was an approach and program under the National Forest Policy of 1988, where state forest departments supported local forest-dwelling and forest fringe communities to protect and manage forests, and share the costs and benefits from the forests with them.²¹ After the Forest Policy of 1988, the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006, was passed in India, which recognised the rights of the forest-dwelling tribal communities and other traditional forest dwellers to the forest resources.²² This act encompassed rights of self-cultivation and habitation, which were classified as individual rights. These rights enabled tribes to cultivate land for their personal use and establish habitation within forest areas. The FRA acknowledged various community rights such as Fishing rights, access to water bodies, Intellectual property and traditional knowledge of tribes related to the forest resources. The act included special provisions for the Particularly Vulnerable Tribal Groups (PVTGs). Section 3(1)(e) of the Forest Rights Act, 2006²³, recognises the habitat rights of the Particularly Vulnerable Tribal Groups. The recognition of Habitat rights provided the PVTGs with the legal recognition of their customary territories, ensuring they can maintain their traditional lifestyle without the fear of eviction. Through this, the PVTGs could access the resources essential for their livelihoods, such as medicinal plants, food, and materials for shelter. The act also allowed the tribes to claim their ancestral lands from the government. But several States have denied 1.75 million land rights claims of tribes, and other traditional forest dwellers have also been rejected by the governments and have been awarded land titles of more than 1.98 million.²⁴

Commercialisation of Forests and Tribal Displacement

The issues related to tribal rights have been ongoing since the British rule and the introduction of plantations. The laws that have been brought on over a period have done nothing significant

²⁰ Ministry of Environment, Forest and Climate Change. (1988). *Aim and objectives under National Forest Policy, 1988*.

²¹ Sundarban Tiger Reserve, *Annual Report 2024–2025* (2025)

²² Durga Lakshmi, S. (2023). A critical appraisal of livelihood rights of tribals with special reference to particularly vulnerable tribal groups of Tamil Nadu. *International Journal of Law, Education, Social and Sports Studies*, 10(2).

²³ The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, No. 2 of 2007.

²⁴ 1.75 Lakh Forest Rights Claims Rejected by State Governments, *Econ. Times* (Sept. 24, 2020).

for the tribes and PVTGs in the Nilgiris. Despite the FRA, the implementation of the rules and protection of the land and resource rights of the PVTGs in the Nilgiris have been facing delays because of bureaucratic complexities surrounding land classification issues. For example, in Gudalur, Tamil Nadu alone, 31 Gram Sabhas submitted a total of 2,224 claims, out of which 1,911 were individual claims and 313 were community claims in 2009. However, the whole procedure is stalled, and not a single title deed has been issued in Tamil Nadu due to the High Court's interim order requiring court permission for issuance. In Pandalur Taluk, data reveals that alone 286 claims were rejected out of 303 forms, highlighting the slow and inefficient bureaucratic process in the implementation of the act²⁵. The encroachment of the forest land for commercial purposes, such as plantations, has increased the challenges to claim and protect their land and resource rights.

The lack of knowledge of the laws arose because of the lack of available translations of laws in the native languages of the tribes. NGOs, which are expected to help these tribes, are now coming out as informers to the government, as they, after collecting information from the tribes, are filing the cases back against the tribes. The tribes expect the NGOs to help with the issue between the government and them, mediate in the issue, give their information, and later on, these NGOs would give these papers to the government authorities, helping them out to try to evict the tribals from their lands. The Non-Governmental Organisations refrain from dissent against the policies of the state as they are financially reliant on the Foreign Contribution Regulation (FCR) funding. To ensure their continued operations, they maintain favourable relations with the government.²⁶

The commercialisation of the biosphere where the tribes have been dominated has brought on significant demographic changes, with the indigenous population being displaced and their traditional livelihoods disrupted. The change that has occurred throughout the forests over a period has brought about a series of problems to the Adivasi communities living in the Nilgiris reserve.

K.T. Subramaniam, the secretary of Adivasi Munnetra Sangam (AMS) speaks on this issue, informing that:

²⁵ Action for Community Organization, Rehabilitation and Development, Implementation of Forest Rights Act in Gudalur (2015).

²⁶ Hebbar, R. (2021). Particularly vulnerable tribal groups in South India: From “backwardness” to “poverty.” *India International Centre Quarterly*, 48(3/4), 309–320.

"When the forests went Adivasis lost access to food sources and traditional medicine, they were forced to work as labour in plantations where they faced ill-treatment and received poor pay, eventually most Adivasi communities here faced health risks, high rates of infant mortality and no access to education he explained. The police and the forest department would continuously harass us, framing us with false charges."²⁷

In the Gudalur, Pandalur, and Masinagudi region of Nilgiri district. There has been a land ownership and demographic scenario unfolding all along. The land in these areas has predominantly been owned and controlled by large estates, with 300 smaller estates managing between 2,000 and 4,000 acres each. These smaller estates are owned by Malayalis.²⁸ The tribal and Dalit population of these areas typically own only one acre or even less, and particularly vulnerable tribal groups like Mullu Kurumbas have received land titles (patta) during the rule of the British, but most tribal families have not been formally granted recognition of their rights over their ancestral lands by successive governments. In fact, the Tamil Nadu government last issued land titles in this region in 1973 to residents of Erumad near the Kerala border.

The lands in these regions of Nilgiris were leased to over twelve companies for cultivating coffee; however, because of poor coffee yields in the region, many of them switched over to tea cultivation. Now these companies hold over 32,000 acres of forest land. The Government of Tamil Nadu tried to reclaim these lands from the companies under Section 17 of the Land Ceiling Act, but the companies contested this in court, with the court providing them to continue using the land during the pending legal resolution, but also prohibited further encroachment of the forest land. Despite the ruling of the court, reports over time have indicated that these companies have been ignoring the court order and continue exploiting the land with allegations of illegal logging activities, with numerous tricks for transporting forest timber.²⁹

Conclusion

The history and laws of forest management in India reveal an increasing trend of marginalising PVTGs, most prominently in the Nilgiri Biosphere Reserve. Colonial forest management

²⁷ Mongabay. (2019, April 11). *Nature and tribal welfare takes a back seat during the elections in the Nilgiris.*

²⁸ M. Rao ed., *Reframing the Environment: Resources, Risk and Resistance in Neoliberal India* (1st ed. 2020).

²⁹ Durga Lakshmi, S. (2023). A critical appraisal of livelihood rights of tribals with special reference to particularly vulnerable tribal groups of Tamil Nadu. *International Journal of Law, Education, Social and Sports Studies*, 10(2)

policies shifted control from people to the state, making practices such as hunting, gathering, and shifting cultivation illegal. However, forest management regulations and laws adopted after independence, in the interest of national progress and forest conservation, primarily followed the colonial model of excluding tribal people from their ancestral forest habitats. In this regard, progressive regulations like the Forest Rights Act of 2006, which sought to revive and recognise the individual, community, and habitat rights of forest-dwelling people, have encountered increased bureaucratic delays.

In the case of PVTGs of the Nilgiris, the PVTGs have continued to face major challenges in the restoration of their rights over the land. Meanwhile, the economic interests of the inhabitants over plantation development and other industries related to forests have also led to the alienation of tribal land. The conservation of forests is of prime importance; however, the importance of the connection between PVTGs and forests is unfortunately neglected.

What is urgently needed is strict and transparent implementation of the FRA, recognition of habitat rights, and meaningful participation of Gram Sabhas in decision-making processes. Legal literacy, accountability of the state authorities, and ethical civil society organisations' engagement are all equally required. A balance between ecological conservation and social justice is not just a policy choice but an imperative duty towards the Constitution as well as morality for the protection of rights, dignity, and identity of PVTGs in the Nilgiris.

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