

Conservation, Displacement and Tribal Right: An Anthropological Study on Tribal Issues in Achanakmar Tiger Reserve

Mollick Farhad

Author Affiliation: Associate Professor & Head, Department of Anthropology, Mahatma Gandhi Antarrashtriya Hindi Vishwavidyalaya, Wardha, Maharashtra-442005.

Reprint Request: Farhad Mollick, Associate Professor & Head, Department of Anthropology, Mahatma Gandhi Antarrashtriya Hindi Vishwavidyalaya, P.O.- Hindi Vishwavidyalaya, Wardha, Maharashtra-442005.
E-mail: farhad.mollick@gmail.com

Abstract

The adivasi right on forest was not recognized during colonial period neither was it ensured after India got freedom. The conflict between the state and communities over the use of forest resources was started with the passing of Indian Forest Act, 1865. The passing of the Scheduled Tribes (Recognition of Forest Right) Bill as Forest Right Act was considered as victory of indigenous people. Under the Forest Act, 2006 the forest dwelling scheduled tribes receive ownership rights over land and forest. But the conservationists, wild life activist and forest department remained opposed to the provision of Forest Right Act in the National Parks and Sanctuaries. In 2008 the Forest Right Act enacted with a provision to create wild life habitat for conservation of wild life and denying the right of forest dwelling tribal communities within critical wild life habitat. As per provision of the Act, under section 4 sub-section 2 of chapter-iii, the forest department has begun widespread evictions across the country. Now the question arises what extent Recognition of Forest Right Act is useful to enjoy their right over forest. Therefore the paper aims to examine the conflict between the right of the tribal people and conservation of forest resources in relation to Forest Policy and Recognition of Forest Right Act.

Keywords: Conservation; Displacement; Tribal Right.

Introduction

India has 668 Protected Areas, out of which there are 102 National Parks, 515 Wild life Sanctuaries, 47 Conservation Reserves and 4 Community Reserve. It extends over 1,61,221.57 sq.km covering 4.90 percent of total geographical area. The Sanctuary/National Park is declared for the purpose of protecting and developing wild life or its environment. The difference between them lies in the vesting of right of people living inside. Certain right of people living inside the sanctuary could be permitted, where as in national park no rights are allowed. The conservation reserves are the areas adjacent to national parks and sanctuaries and those areas which link one protected area with another. The right inside the conservation reserves is not affected.

An ongoing centrally scheme known as Project Tiger sponsored by Ministry of Environment and Forest was launched in 1973 with a view to promote conservation of tiger. It includes support for implementing the provisions of the Wild life Protection Act, 1972. Starting from 09 tiger reserves in 1973-74, the number has grown up to forty seven as on Sep, 2014. The tiger reserve is governed by project tiger, which is of special significance in the conservation of tiger. A total area of 68676.47 sq.km. is covered by the 47 tiger reserves, of which 38770.30 sq.km is core area/critical wild life habitat.

Origin of Research Problem

The forest is managed by the forest dwelling tribal community not only for their livelihood, but also for their socio-cultural life. They are residing on their

ancestral lands for generation. There exists a close relationship between forest dwelling scheduled tribes and forest ecosystem. They are inseparable from this ecosystem and can not survive in isolation. But their dependence on forest was always overlooked. There was always a conflict in between on the needs of the local *adivasi* and preservation of forest. The passing of the Forest Act (Recognition of Forest Rights) in 2006 was considered as a victory of indigenous people. On the other hand the forest officials remained opposed to the Act across the country. They have given stress to keep the provisions of the Act outside the national parks and sanctuaries fearing that the law would damage forest and wildlife. The concept of critical wild life habitat was then introduced in Recognition of Forest Right Act with a view to enhance the Wild life Protection Act and reduce local community interference on forest.

Inter Disciplinary Relevance

A conference on "Displacement, Forced Settlement and Conservation" was held on 9th-11th September, 1999 at Oxford. The conference addressed "In the case of India, it was argued that the scale of tribal cultures and natural resources must not be forgotten. The complexity of relationship of indigenous population with development must be kept in mind." Evidences of displacement from parks and sanctuary shows that "This does not work for the benefit of the local population nor the environment. People should be part of biodiversity; hence conservationists and social scientists should have shared aims". The above mentioned problem therefore need to examine from multidisciplinary platform which was bring together the view of social scientists, conservationists, wild life and social activists to understand the issues relating to the conservation and right of tribal people and also their relationship with forest. Achanakmar Wild life Sanctuary in Chhattisgarh notified as Achanakmar Tiger Reserve in 2009 was selected for the study with a view to examine the conflict between right of tribal people and conservation of forest resources in relation to Forest Policy and Recognition of Forest Right Act.

Forest Governance and Tribal Right

Forest is governed by two main laws, The Indian Forest Act, 1927 and The Wild Life Protection Act, 1972. Declaration of reserve and protected forest under Indian Forest Act, 1927 means no right either existed there or would exist in future. It was observed that there is no specific provision in Indian Forest Act, 1927 for the protection of tribal right over forest.

The Wild life Protection Act, 1972 empowers to constitute a protected area as a national park/ wild life sanctuary. It prohibits the resource exploitation including subsistence use by local communities in a wild life sanctuary. As a result tribal living in sanctuary has lost forest as a source of their livelihood. The restriction on the entry of the local people in wild life sanctuary through this Act leads in raising man-animal conflict. With the commencement of Wildlife Protection Act, 1972 and Forest Conservation Act, 1980, it was observed that there was no role of forest dwelling tribal community in the protection and management of local forest. With the coming up of Forest Conservation Act, a good number of tribal people became illegal residents on land over which they have been living for generation. A large area was also declared as forests without settling their right. People residing in and around the forest were termed as encroachers in their own land. That was a phase of conservation with increased state control. Thereafter the symbiotic relationship of the tribal with forest was stressed in the National Forest Policy of 1988. It aimed to involve tribal people in forest conservation and management. It also recognized the customary right of the tribal people on forest land. In 1990 a circular was issued by the Ministry of Environment and Forest in order to implement the provisions mentioned in National Forest Policy, 1988. But the Ministry failed to implement the 1990 guideline.

In 2002, a eviction notice was issued to forest dwelling tribal communities as they failed to produce residential evidence in forest as per Forest Conservation Act, 1980. A direction for their immediate eviction from the reserve forest instead of recognizing their right was issued. Large relocation from the core areas of National Parks and Sanctuaries increased the loss of livelihood of forest dwelling schedule tribe. Following the protest by tribal communities along with social activists against large scale evictions by forest department, Ministry of Environment and Forest issued a guideline in 2004 to address the issue of recognizing the right of tribal communities to forest land and resources. In 2005 the draft of Recognition of Forest Rights Bill was made to give due recognition the *adivasi* rights to forest resources and prevent the alienation of tribes from their own habitat. In addition the community is given the right to protect forest. But the main challenge of the Recognition of Forest Right Bill, 2005 was to solve the conflicting interest of recognizing forest right of forest dwelling schedule tribe while protecting forest and wild life resources. It also showed a lack of clarity in relation of provisions mentioned in Wild life Protection Act,

1972; Forest Act, 1927 and Forest Conservation Act, 1980. The tribal right bill was therefore opposed by the conservationist and wild life activists. In their view, the Tribal Right Bill may cause the elimination of large forest land and heavy ecological damage. The Ministry of Environment and Forest suggested that people right in the national park and sanctuary may be given after the declaration of protected areas (national park and sanctuary) as critical wild life habitat. Under much civil protest and pressure, the Scheduled Tribes and other Traditional Forest Dweller Act was enacted in 2006 and came into force in 2008. As per provision of the Forest Right Act "the forest rights recognized under the Act in Critical Wild life habitats of national parks and sanctuaries may subsequently be modified and provided that no forest right holders shall be resettled or have their rights in any manner affected for the purpose of creating inviolate areas for Wild life conservation". Because of which the existence of forest dwelling tribal communities in protected areas is coming under threat.

Development of Achanakmar Wild Life Sanctuary as A Tiger Reserve (Area under study)

Achanakmar Wild Life Sanctuary was established in 1975 under the Wild Life Protection Act of 1972. Wild Life Protection Act, 1972 laid the legal framework for the establishment of National Parks and Wild Life Sanctuaries and management of wild life habitat. The entire area of Achanakmar Wild Life Sanctuary was 551.55 square kilometers. It forms the core zone of Achanakmar- Amarkantak Biosphere Reserve notified on 30 May, 2005. The major part of Biosphere Reserve lies in Bilaspur district of Chhattisgarh and remaining part extends into Dindori and Shahdol district of Madhya Pradesh. The total area of Biosphere Reserve is 3,835.51 sq.km. Out of total area, an area of 1,224.98 sq. km. falls in Madhya Pradesh and the remaining area of 2,610.53 sq. km. falls in Chhattisgarh state. The core area (551.55 sq.km.) of Biosphere Reserve will be kept free from all human pressure. The remaining area of 3,283.96 sq.km. surrounding the core zone form the buffer zone. The manipulation activities may be permitted in the buffer zone according to general guideline for the management of biosphere reserve. The constitution of Biosphere reserve under its legal status do not change the status of legal ownership of lands and forest nor affect the right of the tribal and local people in any way.

The Achanakmar Tiger Reserve falls within the core zone of the Biosphere Reserve. In 2003, the 37th meeting of the steering committee of project tiger

recommended that Achanakmar Wild Life Sanctuary spreading over an area of 551.552 sq.km. be declared as critical tiger habitat. Achanakmar Wild life Sanctuary is one of the vital links in the Central India tiger heart land more particularly with Kanha. The Kanha-Achanakmar Corridor links the Kanha tiger reserve in Madhya Pradesh to the Achanakmar tiger reserve in Chhattisgarh. As on Sep, 2014 Achanakmar tiger reserve extends over an area of 914.017 sq.km., out of which 626.195 sq.km. was declared as core area/critical wild life habitat and 287.22 as buffer zone. It has numerous species of wild animals like Chital, Wild Bear, Leopard, Tiger Panthera, Striped Hyaena, Canis aureus Jackal. The birds which inhabit the sanctuary/reserve are peacock, parrot, myna, kingfisher and eagle. The forest has been categorized as Northern Tropical Moist Deciduous forest with trees like sal, saja, dhavda, tinsa, haldu, tendu, jamun, bel, karra and bamboo. The area has SAL (*shorea robusta*) as dominant species.

A. Conservation and Displacement

(i) Affected Village and Community

Achanakmar tiger reserve initially extended over an area of 551.552 sq.km. and subsequently got expanded over an area of 914.017 sq.km. The inhabitants are mainly Baiga. Baiga is a particularly vulnerable tribal group of Chhattisgarh as well as Madhya Pradesh because of their isolated living, dependency on forest economy, low literacy and high mortality rate. The other inhabitants residing in Achanakmar Tiger Reserve are Gond, Bhaina, Sauta, Dhanwar, Ahir, Panika and Kewat. It was decided that the villages located in the core area of Achanakmar wild life sanctuary renamed as Achanakmar tiger reserve, would be relocated on priority basis. At that time it was found that there were 22 villages inside the core area. It was decided in 2006 to relocate the *Jalda* village consisting of 53 families, *Bankal* of 26 families, *Samardhasan* of 12 families, *Bahuel* of 31 families, *Bokara Kachhar* of 23 families and *kuba* of 22 families from the critical wild life habitat of the reserve, where as the provision to create critical wild life habitat under Forest Right Act was enacted in 2008. The decision regarding relocation before declaring and demarcating critical wild life habitat is the violation of Forest Right Act.

Achnakmar tiger reserve was declared in 2009. It consists of 30 villages out of which 25 villages are in core area and 5 villages in buffer area. There are 25 villages with a total population of 8339 living

within the core area of Achanakmar Tiger Reserve. The villages were having high concentration of tribal's (83.67 percent). A total of 1774 house reside in twenty five villages. It was decided that twenty five villages located in the core area of the tiger reserve would be relocated in different phases. The first phase of displacement of six villages (*Kuba, Samardhasan, Bankal, Jalda, Bahaud and Bokara Kachhar*) was made in Dec, 2009. A total of 1611.984 hectares area would be acquired from 25 villages, out of which 196.779 hectares of land was already acquired from six villages during phase-1. 167 families from six villages namely *Kuba, Samardhasan, Bankal, Jalda, Bahuel and Bokara Kachhar* have been relocated in 2009. Out of 167 families relocated due to establishment of tiger reserve, 158 families (94.61percent) were tribals, more particularly Baiga (70.34 percent), a PVTG of Chhattisgarh as well as Madhya Pradesh, whereas sec.3(1e) of the Recognition of Forest Right Act recognized the habitation right of PVTG.

(ii) Rehabilitation Policy

As per provision of the Recognition of Forest Right Act, forest dwelling scheduled tribe would be relocated from critical wild life habitat with due compensation. According to the guideline of the ongoing centrally sponsored scheme of project tiger in 2008, the rehabilitation package for village relocation and rehabilitation with two options was proposed. The affected villages had opted option-2 as a rehabilitation package. If the family opts option-2, the forest department actively involves in the process of relocation from the tiger reserve. Option-1 provides payment of entire package amount (Rs. ten lakhs) to the family without involving the forest department in rehabilitation process. In case of option-2, the entire rehabilitation package amount Rs. 10 lakhs per family will be distributed as follows:

S. No.	The details of the rehabilitation package	Percentage to the total package of Rs. 10 lakhs
1	Agriculture land procurement (2 hectare) and development	35 percentage of the total package
2	Settlement of rights	30 percentage of the total package
3	Homestead land and house construction	20 percentage of the total package
4	Incentive	5 percentage of the total package
5	Community facility (access road, irrigation, drinking water, sanitation, electricity, tele communication, community centre, religious places, burial/cremation ground)	10 percentage of the total package

Revised guideline of the ongoing centrally sponsored scheme of project tiger in 2008 states that in the case of option 2, the relocation process would be monitored/implemented by the two committee namely state level monitoring committee under the chairmanship of chief secretary of the state and district level implementing committee under the chairmanship of district collector. Secretaries of related department, state principal chief conservator of forest, non-official members of respective tiger conservation foundation and chief wild life warden will be the member of state level monitoring committee. The members of district level implementing committee are CEO, representative official from PWD, social welfare, tribal, health, agriculture and education department and deputy director of tiger reserve/protected area.

(iii) Rehabilitation and Livelihood Issues in Resettlement Village

Three villages namely *Bankal, Bokra Kachhar and Smardhasan* relocating from the core area/critical wild life habitat were rehabilitated in one resettlement colony. The design and structure of the rehabilitation village looks like a colony than a village. The construction and design of the house is not like their original habitat. The house of the resettlement village is too hot in the summer season as it is made of cement. As a result they never like to sleep in. A total of 66 eligible right holders were rehabilitated in *Bahuel*, 41 eligible right holders in *Bokra Kachhar*, 30 eligible right holders in *Bankal*, 16 eligible right holders in *Smardhasan* and 22 eligible right holders in *kuba* rehabilitated village. A total of 175 eligible right holders resettled in five villages. The rehabilitated villages are high concentration of tribal (93.71 percent), more particularly Baiga (89.14 percent). At the time of relocation, Rs. 5000 as living expenses was given to the eligible right holder and forty five thousand deposited to their bank account. As per option-11, agricultural land was given. At the time of relocation, it was verbally assured that leveling of allotted agricultural land would be done. But it was not completed. Promises of living accommodation, school, health centre, roads, drinking water and livelihood sources were not fulfilled. It was found that the sources of drinking water were not in working order and availability of drinking water was not enough to sustain their livelihood in the resettlement colony. It was observed that lack of co-ordination in between social welfare, education, health and PWD department exists in the resettlement colony. No *aganwadi* has not yet been constructed in the rehabilitation site. They are not

permitted to go into the forest to collect either minor forest produce or fire woods. Due to setting up of tiger reserve they have lost their traditional livelihood which is collecting forest produce. On the other there are no livelihood options at the rehabilitation site. The only option has to go outside the area and work as wage labour.

They have not only lost their source of income, they are spending more money than before as their basic needs are being fulfilled by the market. They found themselves neck deep in debt as they were alien from their forest based economy. They find themselves more impoverished. It is the violation of Chhattisgarh State Forest Policy, 2001. Under the heading Bio-Cultural diversity Conservation (para 4.9) of Chhattisgarh State Forest policy, 2001 states that displaced tribal people "*rehabilitated on such sites and in such manner that their standard of living after rehabilitation is markedly improved.*"

(iv) Forest and Environmental Policy

National Environment Policy, 2004 issued by the Ministry of Environment and Forest had declared to give legal recognition of the traditional right of forest dwelling tribes. Under the heading "Forest and Wild life" it has recognized that "forest is the traditional homes of forest dwelling tribes". Under the heading of Rights and Concessions of Chhattisgarh State Forest Policy, 2001, Para No. 4.3.3 states that the socio-economic and cultural life of tribal's and other communities living within and near forest revolves around the forest. It also states that the rights and concessions enjoyed by them should be protected, with due regard to the demands of the conservation of biological diversity in the area. Para No 4.9 describes that "Tribals and rural people displaced if any, due to creation of such national parks/biosphere reserve/ or gene conservation should be fully and properly rehabilitated on such sites and in such manner that their standard of living after rehabilitation is markedly improved". It also describes that "Tribals and other indigenous people of the state, residing in and around forest areas, with rich cultural traditions and practices, should be encouraged to maintain their unique relationship with the forest for mutual benefits".

B. Tribal Right

(i) Tribal Right Over Forest

On 13 December, 2005 Ministry for Tribal Affairs introduced the Scheduled Tribes (Recognition of Forest Right) Bill, 2005 into parliament to recognize the forest rights and occupation in forest land who

have been residing in such forests for generations. The Recognition of Forest Right Act was then passed in 2006. It empowers the communities by recognizing their right to use, manage and conserve forest resources. The cut off date for holding ownership right to forest dwelling schedule tribe under the Recognition of Forest Right Act has been extended from 25 October, 1980 (As per Forest Conservation Act, 1980) to 13 Dec, 2005. It attempts to ensure livelihood and food security by recognizing community right over forest resource. The Forest Act, 2006 under the heading forest rights, section 3 (I) of chapter II states 12 specific rights, including the right to live in forest, to self cultivate, right to own, collect, use and dispose of minor forest produce and right to grazing inside the forest which are traditional and customary.

On the other a debate on "whether forest/wildlife or tribals" was raised due to the passing of the Act. Conservationist groups believe in that the Act is against the wild life interest as they allowed people to gain right inside the national parks and sanctuaries. There was a fear to wipe out the forest/wild life in the country. The Conservationist and Wild life Activist tried to keep the provisions of the Act outside the National Parks and Sanctuaries fearing that law would damage forest and wild life. Shankar Gopala Krishnan, spokes person for survival and dignity, pointed out that "The Forest Act is not a land distribution measure that will wipeout forests." "Activists who are fighting for tribal and forest dwellers rights point out that the best forest in India exist where tribals and forest dwellers have control over land and where they reside. According to the forest survey of India, 2003, 60 percent of the forest exists where tribal live. It shows that they have managed to conserve the forest better than others, said campaign for Survival and Dignity spokes person Shankar Gopala Krishan" (Gaur, 2008).

Under section 4 subsection 2 of chapter III, the Forest Right Act states, "The forest rights recognized under this Act in critical wild life habitats of national parks and sanctuaries may subsequently be modified or resettled, provided that no forest right holders shall be resettled or have their right in any manner affected for the purpose of creating inviolate areas for wild life conservation." As per provision of the Act, the state forest department has begun widespread eviction across the country in the name of conservation of wildlife. Achanakmar tiger reserve of Bilaspur district has witnessed an effort to evict local tribal and forest dwellers after the renamed of Achanakmar Sanctuary as Achnakmar Tiger Reserve.

(ii) Tribal Right within Tiger Reserve

The tiger reserve is based on assumption that local communities living in or around wild life conservation area have a negative impact. Therefore they must be relocated outside the boundaries of the reserves and the restriction of their movement into forest will be imposed. This cause of action will protect the wild animal and plant species from human encroachment.

The forest department takes advantage of the project of tiger reserve to facilitate the rehabilitation of the affected families to areas outside the forest, by making it mandatory for the villages to relocate if the villages are inside the core area. After eviction from the reserve the forest department will be secured a monopoly over forest.

The revised guideline for the ongoing centrally sponsored scheme of the project tiger, 2008 has also addressed the inviolate spaces for wild life and relocation of villages from core area/critical tiger habitat in tiger reserve. "According to present estimates of the Ministry of Environment and Forest there are 1487 villages with a population of 3.80 lakhs in just the 28 tiger reserves of which 273 villages and 1.1 lakh people live in what the Ministry calls the 'core' area, that is the area in which according to Ministry there should be no human habitation for the needs of tiger conservation." (Gaur,2008).

The provision relating to the forest right in National Park and Sanctuary mentioned in section 4 subsection 2 of chapter III of the Recognition of Forest Right Act is a crucial issue that goes denying rights to the tribals and forest dwellers. This provision is expected in making to avoid their right within a critical wild life habitat. Human habitation including tribal settlement has therefore to be evicted from the core area/critical wild life habitat. With taking the advantage of this provision the forest department very cleverly has / is being proposed to convert National Park/Sanctuary into tiger reserve. It was found that effort was also made to evict local tribal people before issuing the notification regarding the declaration of core area of Sanctuary/National Park as critical wild life habitat. From the field study of Achanakmar tiger reserve, it was observed that before demarcating the critical wild life habitat, it was decided in 2006 to relocate the six villages located in the core area of the reserve.

Conclusion

As per report of the samata study team, R.K.Rao, a senior forest officer, in his paper "Forest Myths, Jungle

Laws and Social Justice" was quoted, "If we look at the evolution of PA's concept in our country, their objective was preservation (not conservation) of wild life and PA's comprised of core area and a buffer zone, both within the PA, then came the concept of declaring the core area as a National Park and buffer as a Sanctuary under the Wild life Act in view of greater restriction that can be imposed in a National Park and buffer was shifted to outside the PA boundaries. Now the buffer zone is proposed to be declared as the conservation area under the 2003 amendment to the Wild Life Act; and most likely, the area beyond the conservation area, if any is left, will become the buffer zone" (Devullu et al.,2005). It is therefore clear that government is taking more land and natural resources from access of local communities by projecting them as main causes of degradation.

The earlier core area within the protected area is now known as critical wild life habitat. The critical wild life habitat is a legal provision as per Recognition of Forest Right Act. It was created to enhance the Wild Life Protection Act and avoid in continuation of rights of forest dwelling tribal communities over forest land. As a result most of the sanctuaries have/are being declared as critical wild life habitat and converted into tiger reserve. People living in critical wild life habitat, a new name of core area, were/are being evicted in the name of conservation of wild life. As a result the relocation has created a division between civil society group whose thought is on conservation and wild life protection and people's struggle group whose focus is on supporting human right issues. Keeping in mind both the need of conservation as well as requirement of tribal livelihood the issues on tribal right and conservation need more dialogue and integrate the view of conservationist, activist and community members.

Acknowledgement

The author is grateful to University Grants Commission, New Delhi for providing the opportunity for conducting this research work.

References

1. Devullu, P., Raj, M., Bhanumathi, K., Kumar, S. & Bandhopadhyay, A. (2005). *Indigenous and tribal communities, biodiversity conservation and the Global Environment Facility in India*, Forest Peoples Programme, Retrieved- February 17, 2015 from-<http://www.forestpeoples.org/sites/fpp/files/publication/2010/08/gefcodevindiamay05eng.pdf>.

2. Displacement, forced settlement and conservation (1999) in Refugee Study Centre. Retrieved- February 17, 2015 from- <http://mr31.qeh.ox.ac.uk/events/displacement-conservation>.
3. Dwivedi, R., Motilal, Seshadri, S. & Bandopadhyay, G., (2010). *Land Rights Violations at Achanakmar Wildlife Sanctuary (A Fact Finding Report)*, Chhattisgarh, Baiga Mahapanchayat, Nadi Ghati Morcha and Equations, Retrieved- April 07, 2015 from- <http://www.scribd.com/doc/52480983/Land-Rights-Violations-at-Achanakmar-Wildlife-Sanctuary-Chhattisgarh#scribd>.
4. Forest and Culture Department, Government of Chhattisgarh, (2001). *Chhattisgarh State Forest Policy, 2001*. Forest and Culture Department Mantralaya: Raipur, Retrieved - April 07, 2015 from- <http://www.cgforest.com/media/Forest%20Policy-Eng1.pdf>.
5. Forest Rights Act: general issues of implementation and performance of various states. *Sanhati*. Retrieved - April 07, 2015 from- <http://sanhati.com/news/1201/>.
6. Gaur, M. (2008). *The Forest Rights of Tribals*. New Delhi : Alfa Publication.
7. Government of India, Indian Council of Forestry Research and Education, (2012) *Achanakmar-Amkantak Biosphere Reserve Information Series (BRIS)*, Volume 3(1-2), Jabalpur.
8. Lakshmi. S. and etal., *Tribal Right and conservation of forest in India*, National University of Advanced Legal Studies, Cochin. Retrieved -February 17, 2015 from- <http://www.indlaw.com>.
9. Louis, P. (2008). *Rights of Scheduled Tribes of India: Acts, Commission and Recommendations*. Delhi: Mayank Publications.
10. Mallavarapu, R.B., *Development, Displacement and Rehabilitation : An Action Anthropological study on kovvada Reservoir in West Godavari Agency of Andhra Pradesh, India*, International Journal of Social Science. 2006; 1(1): 35-41.
11. Ministry of Environment & Forest, Government of India. (2008). *Revised guidelines for the ongoing centrally sponsored scheme of project tiger*. Retrieved - April 07, 2015 from- http://www.mahaforest.nic.in/act_rule_file/141042605509%20A%2019.pdf.
12. Ministry of Tribal Affairs, Government of India. (2013). *Regional consultation on implementation of Forest Right Act: 'Issues in implementation of community rights with focus on management and governance of CFR' Bhubneswar*, Retrieved - April 07, 2015 from-<http://tribal.nic.in/WriteReadData/CMS/Documents/201404210448365860542Bhubaneswar.pdf>.
13. Ministry of Tribal Affairs, Government of India. (2013). *Status report on implementation of the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006*, New Delhi, Retrieved - April 07, 2015 from-<http://tribal.nic.in/WriteReadData/archiveDoc/201311011208146716728MPR30thjune.pdf>.
14. Mollick, F. (2015). *Project Report on Wild life Conservation and Issues of Tribal Right*, University Grants Commission, New Delhi.
15. Patnaik, S. (2008). *Rights Against Odds: How Sacrosanct is Tribal Forest Rights?*, Proceedings from *Governing Shared Resources: Connecting Local Experience to Global Challenges, the Twelfth Biennial Conference of the International Association for the Study of Commons* Cheltenham, England Retrieved from- <http://dlc.dlib.indiana.edu/dlc/handle/10535/2135>.
16. Rangarajan, M. & Shahabuddin, G. (2006). *Displacement and Relocation from Protected Areas: Towards a Biological and Historical Synthesis*. Conservation and Society. Volume 4, No. 3, Retrieved-April 07, 2015 from- <http://www.indiaenvironmentportal.org.in/files/Displacement%20and%20Relocation%20from%20Protected%20Areas.pdf>.
17. Study Team of Samata (2004). "A Report on Indigenous tribal Communities, biodiversity conservation and the Global Environment Facility in India", Hyderabad, A.P.
18. Vasundhara & Kalpavriksh In collaboration with Oxfam. *A National Report on Community Forest Rights under Forest Rights Act: Status & Issues*. Retrieved - April 07, 2015 from- <http://www.indiaenvironmentportal.org.in/files/file/A%20National%20Report%20on%20Community%20Forest%20Rights%20under%20FRA%20-%20Status%20&%20Issues%20-%202012.pdf>.