



INTERNATIONAL LAW
JOURNAL

**WHITE BLACK
LEGAL LAW
JOURNAL**
**ISSN: 2581-
8503**

Peer - Reviewed & Refereed Journal

The Law Journal strives to provide a platform for discussion of International as well as National Developments in the Field of Law.

WWW.WHITEBLACKLEGAL.CO.IN

DISCLAIMER

No part of this publication may be reproduced or copied in any form by any means without prior written permission of Editor-in-chief of White Black Legal

– The Law Journal. The Editorial Team of White Black Legal holds the copyright to all articles contributed to this publication. The views expressed in this publication are purely personal opinions of the authors and do not reflect the views of the Editorial Team of White Black Legal. Though all efforts are made to ensure the accuracy and correctness of the information published, White Black Legal shall not be responsible for any errors caused due to oversight or otherwise.

WHITE BLACK
LEGAL

EDITORIAL TEAM

Raju Narayana Swamy (IAS) Indian Administrative Service officer



Dr. Raju Narayana Swamy popularly known as Kerala's Anti Corruption Crusader is the All India Topper of the 1991 batch of the IAS and is currently posted as Principal Secretary to the Government of Kerala . He has earned many accolades as he hit against the political-bureaucrat corruption nexus in India. Dr Swamy holds a B.Tech in Computer Science and Engineering from the IIT Madras and a Ph. D. in Cyber Law from Gujarat National Law University . He also has an LLM (Pro) (with specialization in IPR) as well as three PG Diplomas from the National Law University, Delhi- one in Urban Environmental Management and Law, another in Environmental Law and Policy and a third one in Tourism and Environmental Law. He also holds a post-graduate diploma in IPR from the National Law School, Bengaluru and a

professional diploma in Public Procurement from the World Bank.

in Public

Dr. R. K. Upadhyay

Dr. R. K. Upadhyay is Registrar, University of Kota (Raj.), Dr Upadhyay obtained LLB , LLM degrees from Banaras Hindu University & Phd from university of Kota.He has succesfully completed UGC sponsored M.R.P for the work in the ares of the various prisoners reforms in the state of the Rajasthan.



Senior Editor

Dr. Neha Mishra



Dr. Neha Mishra is Associate Professor & Associate Dean (Scholarships) in Jindal Global Law School, OP Jindal Global University. She was awarded both her PhD degree and Associate Professor & Associate Dean M.A.; LL.B. (University of Delhi); LL.M.; Ph.D. (NLSIU, Bangalore) LLM from National Law School of India University, Bengaluru; she did her LL.B. from Faculty of Law, Delhi University as well as M.A. and B.A. from Hindu College and DCAC from DU respectively. Neha has been a Visiting Fellow, School of Social Work, Michigan State University, 2016 and invited speaker Panelist at Global Conference, Whitney R. Harris World Law Institute, Washington University in St.Louis, 2015.

Ms. Sumiti Ahuja

Ms. Sumiti Ahuja, Assistant Professor, Faculty of Law, University of Delhi, Ms. Sumiti Ahuja completed her LL.M. from the Indian Law Institute with specialization in Criminal Law and Corporate Law, and has over nine years of teaching experience. She has done her LL.B. from the Faculty of Law, University of Delhi. She is currently pursuing Ph.D. in the area of Forensics and Law. Prior to joining the teaching profession, she has worked as Research Assistant for projects funded by different agencies of Govt. of India. She has developed various audio-video teaching modules under UGC e-PG Pathshala programme in the area of Criminology, under the aegis of an MHRD Project. Her areas of interest are Criminal Law, Law of Evidence, Interpretation of Statutes, and Clinical Legal Education.



Dr. Navtika Singh

Nautiyal



Dr. Navtika Singh Nautiyal presently working as an Assistant Professor in School of law, Forensic Justice and Policy studies at National Forensic Sciences University, Gandhinagar, Gujarat. She has 9 years of Teaching and Research Experience. She has completed her Philosophy of Doctorate in 'Intercountry adoption laws from Uttranchal University, Dehradun' and LLM from Indian Law Institute, New Delhi.

Dr. Rinu Saraswat



Associate Professor at School of Law, Apex University, Jaipur,
M.A, LL.M, Ph.D,

Dr. Rinu have 5 yrs of teaching experience in renowned institutions like Jagannath University and Apex University. Participated in more than 20 national and international seminars and conferences and 5 workshops and training programmes.

Dr. Nitesh Saraswat

E.MBA, LL.M, Ph.D, PGDSAPM

Currently working as Assistant Professor at Law Centre II, Faculty of Law, University of Delhi. Dr. Nitesh have 14 years of Teaching, Administrative and research experience in Renowned Institutions like Amity University, Tata Institute of Social Sciences, Jai Narain Vyas University Jodhpur, Jagannath University and Nirma University.

More than 25 Publications in renowned National and International Journals and has authored a Text book on Cr.P.C and Juvenile Delinquency law.



Subhrajit Chanda



BBA. LL.B. (Hons.) (Amity University, Rajasthan); LL. M. (UPES, Dehradun) (Nottingham Trent University, UK); Ph.D. Candidate (G.D. Goenka University)

Subhrajit did his LL.M. in Sports Law, from Nottingham Trent University of United Kingdoms, with international scholarship provided by university; he has also completed another LL.M. in Energy Law from University of Petroleum and Energy Studies, India. He did his B.B.A.LL.B. (Hons.) focussing on International Trade Law.

ABOUT US

WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal providededicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you

WHITE BLACK
LEGAL

EFFECTIVENESS OF THE FOREST RIGHTS ACT **ON THE LIVELIHOOD OF TRIBAL** **COMMUNITIES IN WAYANAD.**

AUTHORED BY - THERES EMMANUEL (7th Semester BA.LLB),
CO-AUTHOR - ANN MARY JOY (9th Semester B. com. LLB),
CO-AUTHOR 2 - ANN KOCHIKUNNEL (3rd Semester B. com. LLB),

Students

Kristu Jayanti College of Law

ABSTRACT

In our rapidly changing world, tribal communities continue to occupy an underprivileged status within society. The enactment of the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006, has emerged as a pivotal force in the upliftment of tribal communities, addressing various facets of their development. Recognizing the vulnerability of tribal groups in our nation, the imperative to safeguard their interests and rights is underscored. This study delves into the specific context of Wayanad, a district in Kerala, examining the nuances of the Forest Rights Act 2006 and its impact on tribal communities. The research accentuates the dual focus on the shortcomings of the Forest Rights Act 2006 in Wayanad and the positive strides made in livelihood improvement through its implementation. It meticulously analyses the impediments faced by tribal communities, stemming from a lack of awareness about the legislation. The study reveals critical deficiencies in environmental habitat protection, leading to the degradation of grasslands due to commercial activities such as dams, mines, and industrial projects. Furthermore, the Act is revealed to confer possession rights and essential amenities to indigenous communities, while also emphasizing the preservation and management of natural resources. The paper underscores the exploitation of the tribal populations by empowered authorities tasked with upholding the provisions of the Act. Transparency within various committees, such as Grama Sabha, Subdivisional Level, District Committee, and State Committees, emerges as a crucial necessity, as observed in the assessment. In conclusion, this study advocates for the refinement and effective implementation of

the existing Forest Rights Act, stressing the need for transparency, awareness programs, and proper training to empower tribal communities. It recommends entrusting tribal populations with the responsibility of forest maintenance, promoting community empowerment for the overall peace and security of tribal areas. It is clear that the implementation and rectification of downfalls of the existing act is focused on this study.

Key Words: Forest Rights Act, 2006, Tribal Communities, Population.

1. INTRODUCTION

The main goal of the Forest Rights Act of 2006 was to establish a balanced and mutually beneficial relationship between forest protection and the enhancement of the living standards of indigenous groups residing in these areas. This legislation granted indigenous individuals the freedom to exploit and safeguard forest resources, representing a substantial improvement over prior rule. Indigenous groups, who heavily rely on woods for their sustenance and survival, have historically been subjected to exploitation by official rules. The rights of indigenous communities, which are intricately connected to the forests, have often been subjected to examination, leading to legal approval for coerced displacements. During the period of British rule and in subsequent legislation after gaining independence, lawmakers ignored and suppressed these tribes, portraying them as threats to forest resources. The Forest Rights Act of 2006 was designed to rectify historical disparities and is under the jurisdiction of the department responsible for the development of scheduled tribes, overseen by the central minister of tribal affairs.

The implementation of the Forest Rights Act has brought about significant transformations in the lifestyle of indigenous communities. The outcomes, however, vary, with certain persons reaping advantages from the action while others persist in adhering to old patterns and experiencing modest improvements. The primary objective of the act was to enhance the status of indigenous communities by ensuring their access to essential services, thereby integrating them into mainstream society. However, the introduction of specific restrictions on the procurement and accumulation of forest resources in Wayanad has significantly affected their traditional means of sustenance, forcing people to adapt to unforeseen methods of survival. The aim of this study, titled "Effectiveness of the Forest Rights Act on the Livelihoods of Tribal Communities in Wayanad," is to examine the impact of

several factors, including living conditions, income sources, and traditional customs, on the livelihoods of these communities.

2. LITERATURE REVIEW

Merlin Mathew and K. B. Umesh (2019) in the article titled 'Tracking the Status of the Forest Rights Act, 2006, and its Impact on the Livelihood of Tribal Communities in Wayanad District of Kerala, India,' primarily examines the effectiveness of the Forest Rights Act (FRA) in enhancing the livelihoods of tribal groups. The study analyses many aspects of the Act that seek to enhance the socio-economic conditions of these indigenous groups. However, the efficacy of the Forest Rights Act is hindered by hurdles arising from insufficient implementation and limited awareness among the intended recipients. The study emphasizes that the Act's poor fulfilment can be attributed to these concerns, resulting in an insufficient overall implementation of the Forest Rights Act in the Wayanad district of Kerala.

Sherin. S Das (2017), in the research article titled "Forest Rights Act: A Statute Update of Kerala" an essential aspect concerning tribal areas in Kerala is emphasized. The research emphasizes that a substantial number of tribal areas in the state lack official recognition as Grama Sabha, impeding the effective implementation of the Forest Rights Act (FRA). The successful implementation of the FRA hinges on the collaboration and synchronized endeavours of various departments, including the Revenue department, Forest department, and Tribal department. The research emphasizes a specific barrier unique to Kerala, where the lack of recognition of Grama Sabha in many tribal areas impedes the full enforcement of the Forest Rights Act. In the event that these areas are not officially acknowledged as Grama Sabha, the indigenous populations residing there may be deprived of the intended advantages and entitlements outlined in the FRA.

The article authored by Aditya v. Nai and Vishnu V.S (2018) bearing the title 'Globalization, Land Alienation, and its Impact on the Right to Livelihood of the Tribal Communities in Kerala.' The main aim of the study is to analyse the influence of globalization on indigenous communities in Kerala and propose measures to acknowledge and safeguard their rights, particularly with regards to their livelihoods. Vishnu V.S.'s study clearly illustrates that the effects of globalization are readily observable in the tribal people of Kerala. This study examines the impact of this global phenomenon

on the traditional lifestyles and land ownership of these communities, with a specific focus on the right to make a living. The report not only recognizes the challenges posed by globalization but also seeks to provide practical suggestions for mitigating adverse effects and protecting the rights and livelihoods of Kerala's indigenous community.

In their 2019 study titled 'Tribal Livelihood in Wayanad, Kerala: Changing Patterns,' Merlin Mathew and K.B Umesh highlight the complex interplay between socio-economic factors and contemporary strategies that impact the livelihoods of tribal communities. The study indicates a substantial shift in the traditional dependence of these communities on forest resources, signifying a departure from past patterns. The research emphasizes the substantial impact of the socio-economic milieu and evolving methods on moulding the way of life of tribes in Wayanad, Kerala. The study examines the complex factors that impact the livelihood patterns of the tribal group through an analysis of the current conditions and strategies. This thorough analysis enables a deeper understanding of the complex processes within the socio-economic framework of Wayanad's indigenous communities.

The research 'Decentralisation, Participation and Boundaries of Transformation: Forest Rights Act, Wayanad, India' by Sudheesh R. Chemmencheri (2013) demonstrates that the livelihoods of tribal tribes in the area are greatly influenced by an intricate combination of socio-economic elements and contemporary techniques. This investigation provides a thorough understanding of the complex interplay between these elements, clarifying the evolving nature of indigenous livelihoods in Wayanad. This study emphasizes the significant impact of present socio-economic conditions and modern approaches on the transformation of the way of life of tribal communities in this specific area of Kerala. The research seeks to uncover the intricate elements that impact the present livelihood patterns of the indigenous people in Wayanad through a comprehensive analysis. This extensive inquiry is essential for providing a thorough comprehension of the socio-economic milieu that impacts the choices and strategies for survival of these individuals.

C. A. Wilson and M. Rajesh (2018) in their work, titled "An Analysis on the Impact of Forest Rights Act 2006 in Wayanad among the Tribal People in the District of Kerala," the author examines the significance of the Forest Rights Act 2006 as a legal remedy for addressing historical injustices experienced by forest-dwelling communities. This study thoroughly examines the correlation

between the implementation of the Forest Rights Act and the positive transformations observed in the livelihoods of the indigenous community in the Wayanad district of Kerala. The Forest Rights Act 2006 is a consequential legislative initiative designed to address the longstanding grievances of those living in forested areas. Wilson and Rajesh's research emphasizes the crucial role of the legal system as a remedy and comprehensively analyse its impact on the indigenous population in Wayanad. This study deepens our comprehension of the concrete ramifications of the Forest Rights Act by demonstrating connections between the legislation and the tangible enhancements in the livelihoods of the indigenous community.

3. METHODOLOGY

This study utilizes a standardized approach, employing secondary data collected from multiple sources to obtain relevant insights. The research methodology used in the study is of a descriptive nature. The databases consist of academic literature, and significant resources related to the topic obtained from publications, journals, legislation, research papers, and reports published by governmental and non-governmental organizations. A thorough and methodical analysis of the gathered data has been conducted, and conclusions have been drawn from these findings. This study aims to gain a comprehensive understanding of certain aspects of the Forest Rights Act of 2006 and its implementation in the Wayanad region.

3.1 RESEARCH QUESTIONS

- Whether there is an effective implementation of the existing Forest Rights Act 2006?
- What impediments does the tribal community encounter because of the insufficient awareness the Forest Rights Act 2006 in Wayanad?
- How the limitation on the Exploration of Forest goods effects the livelihood of the tribal community?

3.2 OBJECTIVES

The primary aim of this study is to identify the deficiencies in the implementation of the Forest Rights Act (FRA) of 2006 in Wayanad, along with the significant advancements in enhancing the welfare of the forest dwellers. The project seeks to investigate the challenges faced by indigenous populations, including their low understanding of legislation. Furthermore, the study highlights notable

shortcomings in the protection of biological ecosystems, leading to the degradation of grasslands due to commercial activities.

4. DISCUSSION

Implementation of the existing Forest Rights Act 2006 in Wayanad.

In the Wayanad district of Kerala, a significant majority of the native population, totalling 23.39%, resides either within or in close proximity to forested areas. The implementation of the Forest Rights Act (FRA) in 2006 was anticipated to enhance the confidence and understanding of indigenous communities. The purpose of this legislation was to safeguard the rights of indigenous communities and foster the ecological well-being of the woodlands. However, in Kerala, the implementation of the Forest Rights Act is carried out through the Oru Sabha instead of the gram panchayat.

The study in Wayanad district, comprising 769 participants, revealed that a remarkable 69.41% of them were unfamiliar with the FRA Act of 2006. According to the provisions of the act, tribes were given the right to inhabit land. Nevertheless, in certain instances, they encountered difficulty in acquiring it, and a small percentage of them were incapable of furnishing substantiation to validate their assertions of ownership. A designated portion of the land under the Thirunelli Panchayat was assigned for cultivation, while the remaining area, which was under the jurisdiction of the tribal community, was exempted. The primary objective of the act was to streamline the agricultural utilization of the land, hence fostering economic stability for the tribes. However, the survey indicated that the majority of individuals were allocated less than one acre, therefore not achieving this goal. Furthermore, a minute proportion of persons (0.79%) expressed uncertainty regarding their complete acquisition of property ownership.

Only 20.42% of the individuals who gained ownership managed to purchase both agricultural and housing properties, while a mere 21.72% secured agricultural property over one acre in size. Regarding properties intended for community social use, 48.89% of the tribes were uninformed, and 37.58% were unable to obtain ownership. Even among individuals who possessed these abilities, a substantial proportion were uncertain about the exact goals they were meant to achieve.

According to Section 3(1)(c) of the Forest Rights Act 2006, underprivileged groups are given the authority to utilize forests for their sustenance. However, in Wayanad, a mere 18.75% of the

population was aware of this offer. The lack of awareness can be linked to the difficulties posed by forest access restrictions imposed by forest departments and the presence of wild animals. 50.07% of respondents reported that their lifestyle stayed the same following the implementation of the act.

In order to achieve the objectives of the Forest Rights Act, it is imperative to enhance the efficiency and effectiveness of its implementation. Improving the existing system is crucial for efficient coordination among several projects and development agencies. In order to ensure the proper execution of the act, it is imperative to identify and rectify any errors, deficiencies, and weaknesses.

Impediments faced by tribal communities in Wayanad because of the insufficient awareness the Forest Rights Act.

In the current context, the judiciary plays a crucial role in addressing the deficiencies of authorities in implementing laws. The execution of the Forest Rights statute has been impeded by the ineffectiveness of authorities, leading to a dearth of knowledge among indigenous groups regarding many aspects of the statute. The indigenous tribes' lack of understanding contributes to ambiguity, potentially leading to the misconception of their rights.

A significant impediment faced by tribes is the denial of their rightful entitlements. Tribes often have challenges in establishing their land rights, as they are regularly taken advantage of by authorities who abuse their lack of knowledge. Indigenous folks' involvement in decision-making processes regarding forest management, which directly impacts them, is limited. The main objective of the Forest Rights Act of 2006 is to improve the economic condition of indigenous communities by granting them land rights specifically for agricultural activities. Nevertheless, the execution of this legislation in the Wayanad region has been deemed ineffective.

The implementation of the act aimed to rectify historical injustices and address the shortcomings of previous legislation that denied forest-dwelling populations of their rights. However, the limited knowledge and understanding of the Forest Rights Act among tribal communities provide a significant obstacle to their empowerment.

Limitation on exploration of Forest goods and its impact on the livelihood of the tribal community.

The indigenous populations, previously strongly connected to the forested areas, are presently encountering challenges that have rendered their daily lives arduous. The implementation of restrictions on the exploitation of forest resources, engagement in agricultural operations, and the practice of shifting cultivation has resulted in substantial disturbances to their traditional ways of life. The inability to gather tubers, animal flesh, honey, and other fruits, together with the restrictions on cultivating traditional crops such as ragi, corn, tiny millet, and sorghum, has compelled them to abandon their forest habitats. Driven by the need to get food by working on farms and getting paid jobs outside the forest, they have adopted different ways of eating, which involve harmful habits like drinking alcohol and using tobacco, due to increased interaction with the prevailing society. This has ignited an existential quandary among the indigenous people.

The Forest Rights Act of 2006 was enacted to tackle these issues by enhancing the preservation of forests and protecting the welfare and food accessibility of Scheduled Tribes living in forest regions. The main goal of the Act is to protect biodiversity and maintain ecological balance.

The survival of these tribes has historically relied on their close relationship with the forest, primarily through traditional farming methods and the collection of forest products. The practice of shifting cultivation, which was once prevalent in agriculture and yielded crops such as Ragi, Chama, and Muthari, is now limited as a result of restrictions governing the utilization of forest land. As a result, the tribes have been compelled to abandon their traditional agricultural practices and crops in favour of unfamiliar methods, such as cultivating rice and pepper. Furthermore, they have been driven to explore alternative methods of generating income, such as engaging in goat and cow farming.

Despite the increasing prevalence of modern livelihood strategies, there is a lack of supportive programs available for indigenous populations. The enforcement of the Forest Rights Act has brought about significant changes to people's lives by imposing restrictions on the use of forest land and reducing the availability of residential property. A displaced resident described the change, confirming that they used to rely on the forest for food and resources, but now they are engaged in paid work, using their earnings to buy goods from the local market and experiencing increased poverty.

A clear constraint that has been identified is the hindrance in collecting forest resources for sustenance. Tribal populations encounter supplementary obstacles as a result of the limitations imposed by forest authorities on activities such as procuring firewood with knives, harvesting bamboo, trimming willows, and engaging in fishing within forest perimeters. These challenges are further intensified by the already arduous process of collecting tubers and other essential items on a daily basis.

1.5 FINDINGS

The examination of the Wayanad tribal community exemplifies the multifaceted implications of the Forest Rights Act, revealing both beneficial and detrimental outcomes. The enactment of the Act has undeniably bolstered the confidence of indigenous groups by bestowing upon them the rights of land ownership. However, this newly gained possession has also posed a subtle challenge, since it tends to confine tribal tribes to specific areas.

A significant restraint identified in the study is the imposition of restrictions on the gathering of forest commodities. This constraint poses a significant threat to the traditional methods of survival for the indigenous community, leading to the disturbance of longstanding traditions and making them vulnerable to economic vulnerabilities. Furthermore, the implementation of the Forest Rights Act is hindered by a lack of transparency, creating a favourable atmosphere for those in authority to exploit it. The absence of openness in the implementation of the Act not only undermines the intended benefits for the indigenous population but also perpetuates a cycle of mistrust and disappointment.

The research findings endorse the adoption of comprehensive awareness campaigns and specialized training programs aimed at empowering indigenous communities. By disseminating information about their rights and the complexities of the Forest Rights Act, local communities can enhance their ability to effectively govern land ownership and utilize resources. The report proposes a substantial shift in forest management by entrusting the responsibility of upkeep to indigenous groups. This approach not only acknowledges the inherent connection between indigenous inhabitants and their environments but also enhances their capacity for making informed decisions. By actively including tribal tribes in the conservation and sustainable utilization of forests, a harmonious and mutually advantageous relationship can be developed between these communities and their natural

surroundings.

1.6 CONCLUSION

The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act of 2006 is a significant legislative accomplishment since it acknowledges and safeguards the rights of individuals residing in forest areas. This Act was enacted to address the long-standing disparities faced by indigenous communities residing in forested areas. The Forest Rights Act has the potential to significantly transform the intricate relationship between forest resources and the populations reliant on them, by offering a versatile legislative framework.

The Forest Rights Act encompasses extensive provisions that provide precise elucidations regarding institutional arrangements, rejuvenation, and the sustainable governance of forest resources. The implementation and subsequent application of this law have had a substantial impact on both the lifestyle and economic prosperity of indigenous communities. The Act has not only obtained legal acknowledgment but has also played a substantial role in advancing social equity, empowering indigenous communities, and implementing effective forest management approaches.

However, the implementation of the Forest Rights Act is not devoid of challenges, and certain limitations have hindered the full realization of its objectives. The Act's objective of enhancing the economic circumstances of tribal individuals has led to significant and frequently detrimental changes in the traditional lives of tribes in Wayanad due to the specific restrictions imposed on their livelihoods.

Under a broader context, the Forest Rights Act presents a promising avenue for positive change, as it fosters equity in society, empowers indigenous communities, and promotes the sustainable governance of forests. To maximize its impact, it is crucial to address the identified shortcomings in the execution. A complex and adaptable strategy is necessary to ensure that the Act effectively accomplishes its intended objectives and serves as a potent instrument for enhancing the economic well-being of tribes, especially in areas like Wayanad where the impact on livelihoods is particularly substantial.

REFERENCE

Chemmencheri, S. R. (2013). Decentralisation, participation and boundaries of transformation: Forest Rights Act, Wayanad India. 12-14.

- Das, S. S. (2017). Forest Rights Act A Statue Update of Kerala. 3-5.
- Umesh, M. M. (2019). Tribal livelihood in Wayanad, Kerala, changing patterns. 3-4.
- Ummesh, M. M. (2019). Tracking the stats of Forest Rights Act, 2006. 117 - 133.
- V.S, A. v. (2018). Globalization, Land Alienation and its Impact on the Rights to Livelihood of the tribal Communities in Kerala. 83-99.
- <https://kirtads.kerala.gov.in/library/>,2018
- <http://www.researchsquare.com>,2023
- <http://thiikindiaquarterg.org/index.php/think-ida/article/view>,2019
- <http://www.jstor.org>,2015



W H I T E B L A C K
L E G A L