

## **Significance of the Forest Rights Act, 2006 and its implementation in forest-dwelling communities of India**

Abee Narayan

*Indian Institute of Forest Management  
Indian Institute of Forest Management, Nehru Nagar, Bhopal*

---

**Abstract:** The paper tries to focus on the implementation status of the Forest Rights Act, 2006 (FRA) in India, and implications on the forest-dwelling communities in India. The work elaborates on various forest dwellers, their legal statuses, and their progress in claiming the rights including community forest rights under section 3(1)(i) of Forest Rights Act, 2006 of India. The study focuses on the Juang community of Keonjhar, Odisha who are classified as particularly vulnerable tribes under the Dhebar Commission. The main focus of the study was to measure the implementation status of FRA in the Odisha state of India and to study the influencing factors which every community used to implement the act in their region. The article documents the claim procedure and their current status in various regions and also looks into forest dependency on food among these tribes. The documentation also helps to understand the intricacies of FRA and the roadblocks ineffective implementation of the right at a larger scale. The work also looks into the livelihood options of forest-dwelling communities after FRA and the resource management techniques of forest depended on communities bestowed by the rights. The study also tries to document forest food dependency of communities and the significance of conservation of traditional knowledge.

**Keywords:** Forest Rights Act, Community Forest Rights, Scheduled Tribes, Sustainable Forestry

**One-liner:** The paper tries to analyze the status of forest rights in particularly vulnerable communities of India and try to find the best practices for sustainable forestry and to fast track the claims under FRA.

---

Date of Submission: 16-04-2020

Date of Acceptance: 01-05-2020

---

### **I. INTRODUCTION**

With India's size and its heterogeneity, she is not an easy country to govern. A population of 1.22 billion people spread onto twenty-nine states and six union territories with border tensions in both North West and North East of the nation, she has always found herself too difficult to be governed. As a by-product of these tensions 'national unity' has always dominated the policy concerns of the interim government, but as a repercussion of such thinking overt centralization and reluctance to opening up of decision-making process at ground level has affected the poor of the nation. In Nehru's vision of planned development, the state occupied the foremost priority. The state was instrumental in providing to society the public goods from which everyone would benefit. India became a highly interventionist state that pursued welfare and socialist objectives by itself regulating the entire country. This resulted in a public sector with a huge army of employees whose interest lay in its self-perpetuation and the acquisition of as much benefit as possible from the economy. The bureaucrats became the arbiters of public interest blatantly refusing the advice and consent of the citizens so much that one aspect of democratic struggle in India now is to make the government more accountable to people of the nation. The nation always accepted the fact that scheduled caste and the scheduled tribe has faced historical injustice, let it be including exceptions in article 15 or creating special development plans for tribals in article 244 to creating a statutory commission for the minority in the form of the national commission for scheduled caste and scheduled tribe (NCSC&ST). Now when it comes to creating an exemplary example between rhetoric and reality, the Indian government sets high standards. To date, Parliament has not found time to discuss any recommendations made by the NCSC&ST according to Public Policy and Politics in India: How Institution Matter by Kuldeep Mathur(Mathur, 2013). The economic reforms in 1991, gave rise to a plethora of NGOs and stressed the importance of participatory democracy. Traditionally NGOs worked locally restricted to a certain geographical location rendering services and supplementing efforts of government in delivering government-approved entitlements. The reforms led to a larger role for NGOs such as influencing government in policy making and pressuring the government for enactment of new rules and amendments. The government has opened up to an extent where experts and NGO leaders to committees of policymaking but the final call still lies with the bureaucrats. The recommendations are filtered by the civil servants without consultation of committee members who drafted the policy. The general dissent among the NGOs is that they push their agenda for a

policy change with a civil servant and when the process is almost complete, the bureaucrat changes and a new officer comes and NGOs have to start the process of advocacy from the scratch which might not give the desired result. The need for an alternate channel through which advises can be solicited and put forward to the ministers will be the only way to reduce the powerful dominance of bureaucracy.

The Forest Rights Act, 2006 also is filtered through the problems mentioned above. The strong bureaucratic set up has ensured that the benefits of the act are not implemented with its full essence, rather allowed to trickle down to create non-perennial benefits to the mentioned section of the society. After the implementation of the rights in 2008, eleven years have passed and still, even one tribe in India have not received Habitat Rights, no pastoralist community has got exclusive rights for grasslands and even the Particularly Vulnerable Tribal Groups (PVTGs) in India have not received form 'C' for community rights. The study focussed on measuring the implementation status of FRA across India. The case study was conducted in the Keonjhar district of Odisha on the Juang community. Juang is classified as PVTGs under the constitution of India and is one of the most backward communities in India in terms of the MPI index. Unlike the other two communities mentioned above, the Juangs do not have a strong collective organization among the community to fight for their rights. The indigenous community heavily relies on NGOs for policy advocacy regarding FRA. The Juang community has claimed for Habitat Rights under Form 'B' of community rights under FRA. The process is still in the nascent stage and is constantly supported by regional NGOs at every step of the claim process.

## **II. MATERIAL AND METHODS**

The data collection was done using PRA tools such as focus group discussions and semi-structured interviews. The data collected was analyzed and observations were noted. The study mainly makes use of primary research techniques such as focus group discussions and semi-structured interviews for data collection. The preliminary aim of the study is to document the procedure for claim process of various forest dwellers and to understand the intricacies in the implementation of the forest rights in India. The implementation and post-claim management are not documented in recent studies on forest rights. The results of this study emphasize on giving insights to the current situation in Keonjhar of Orissa rather than giving a decision making output. The research will help in acquiring new insights into the problem which can further be modified and elaborated for another study. The study also emphasizes the post-claim management of community resources in all the regions under the study.

In research design, the study plans to conduct a before and after study in locations where community rights are distributed where the focus will be on the impact of the forest rights on the community livelihood. A longitudinal study is done for regions which are still undergoing the claim process and a retrospective-prospective study on the dependency of the community on the forest for its sustenance. Nonprobabilistic sampling is proposed for all the locations. In non-probabilistic sampling as discussed convenience sampling is chosen. The field facilitator chooses the village in his or her convenience and that villages or hamlets are chosen for the study. The visiting villages should have successful claim documents or any other desired progress the study is emphasizing in the context of forest rights.

## **III. RESULTS AND DISCUSSION**

### **Odisha – Juang Community, Keonjhar**

#### **Context**

In India, forests are the second largest after agriculture in terms of land use and are integral to the environment, economy, culture, and history of the country. Forests cover approximately 20% (64.1 million hectares) of India (FAO, 2007) with an estimated 49 percent is considered 'natural' forest or agroforestry, and the remaining 33 million ha of planted forest ranks second worldwide (ITTO, 2006b). These forests are not only environmental but also the social resource of the country. Forests in India are currently managed for ecological security and for addressing the livelihood needs of forest-dependent communities. Communities managed their forests since ancient times till the time when the British introduced several legislations curtailing the rights of forest-dependent communities in British India (Dutta, 2016). Forest dependent communities all over India was severely affected by the commercial forestry rules of the colonial era. The laws didn't change much even after India got independence, but in 1988 a ray of hope was seen with the formulation of the NFP or the National Forest Policy. It suggested the idea of empowering and involving the local communities in forest protection and development activities. It was after this suggestion that the Joint Forest Management (JFM) program was instituted in 1990 and Joint Forest Management Committee (JFMCs) was given the responsibility of helping in designing micro-plans for regeneration, protection, and management of their forests. The scientific and technical part was to be dealt with by the Forest department. This was a partially decentralized mechanism of managing forests with the Forest department having the first say in all major administrative decisions. As time progressed, many communities argued that they should get management and tenure rights too, and should have access to

daily needs like fuelwood without paying any fee to the Forest department no matter how nominal it may be. It was in 2006 that the FRA was enacted and community forest management (CFM) came into play in India legally.

Odisha is among the poorest states in India, with very high levels of income poverty. About 47 percent of the population was classified as below the poverty line in 2000 (Commission, 2003). The percentage of poor people in southern and western Odisha is particularly high. 'Scheduled tribes' and 'scheduled castes' are among the poorest groups in the state; the tribal population, which accounts for about 22.13 percent of the total population, is the poorest of all. Southern Odisha is one of the poorest regions in India. Of the total number of poor, 90 percent live in rural areas, and poverty is particularly intense among tribal populations living in forest-fringe villages. The majority of tribal people live in southern and western Odisha, where most of the state's forests are located (Baginski & Blaikie, 2007).

This study mainly focuses on the challenges for providing proof under FRA's habitat right, a sub-clause in community rights extended to pre-agricultural communities and particularly vulnerable tribal groups (PVTGs). Due to a healthy grass root level NGO support, there is a growing awareness among the forest-dwelling community about their rights. Even though the Rights are gaining its ground but there aroused many problems of the definition and its sub-clauses being vaguely enunciated, and the procedures for filing the claim process being conspicuously indeterminate, that the right suggests a perfect idea which has miserably failed in ground reality when looking back after 11 years of its implementation. The sad truth is that even one case of habitat rights has been approved to date in India even after identifying a humongous 75 primitive and vulnerable tribal groups by the government of India. The threat of losing their habitat to external forces among the forest-dwelling communities remain the same. The habitat rights are explained in section 2(h), and 3(1)e where it predominantly elucidates on what constitutes a habitat but procedure for filing the rights under these sections is not explained under the rights. The ambiguity surrounding habitat rights has slowed down the process to an extent where even one habitat right has been given to date. The overall FRA status in Odisha is predominantly focusing on IFR titles, and for CFR and CR the titles are yet to be distributed. The table below shows the progress of FRA in Odisha.

**Table 1: FRA status of Odisha**

<b>Title</b>	<b>Claims received</b>	<b>DLC approved</b>	<b>Titles are given</b>
<b>IFR</b>	73736	58439	57541
<b>CFR</b>	180	180	-
<b>CR</b>	370	331	-

**Table 2: status of PVTGs in FRA**

<b>Category</b>	<b>Number of titles</b>
<b>CR</b>	39
<b>CR (PVTG)</b>	20
<b>CR at the gram sabha</b>	21
<b>CR at SDLC</b>	18
<b>IFR</b>	15297
<b>IFR (PVTG)</b>	4988
<b>IFR at Gramsabha level</b>	12462
<b>IFR at SDLC level</b>	2835

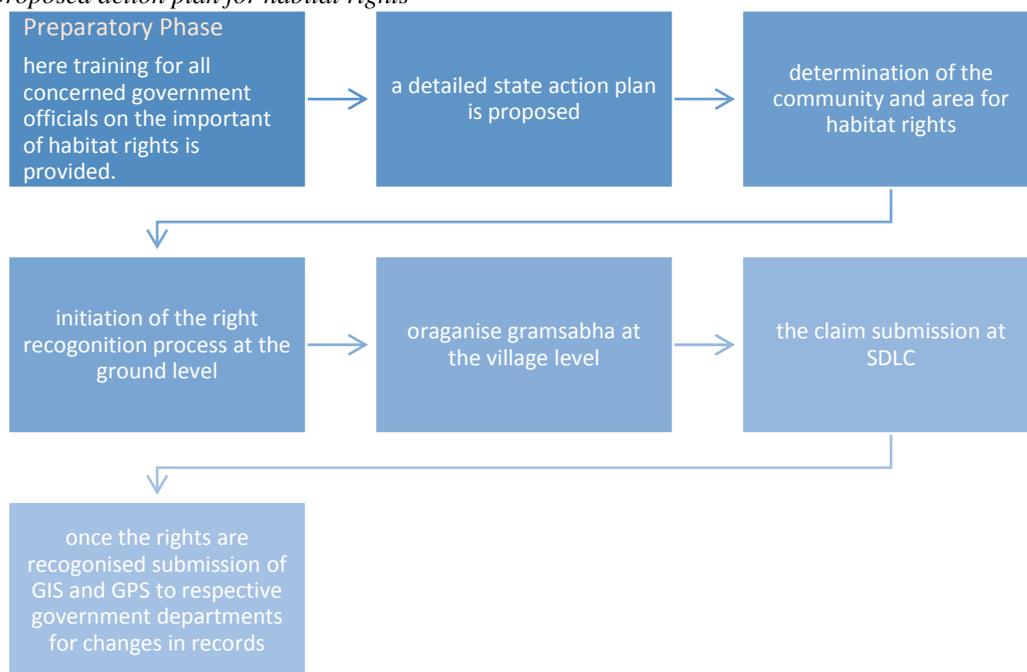
There are 180 CFR, and CR claims passed at the DLC level in Keonjhar district, and the titles will be issued soon. The claim forms are with Vasundhara for further verification of land demarcation and other documents. The main focus of the study is the progress of Habitat Rights in the Juang community of Keonjhar district of Odisha. The habitat rights forms were sent back from SDLC as the mapping of the region was not done correctly in the case of the Juang community. The claim process is moving at a snail pace when it comes to community rights, especially habitat rights.

### **Forest rights status**

The claim process for habitat rights among the Juang community in the Banspal tehsil is under process. According to the villagers, 11 villages collectively have applied for the habitat rights under form b of the forest rights act. According to the forest rights act section 3(1)(e), rights including community tenures of habitat and habitation for primitive tribal groups and pre-agricultural communities have to be granted under community rights claim of the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act. The Gupta Ganga Forest rights committee is part of the 11 other committees that collectively are demanding the rights over a forest cover of 486 sq/km. The Juang are territorial neither do they go into another territory for

cultivation nor do they allow others to cultivate in their land. They restrict other tribes from practicing shifting cultivation in their area. A case that happened 20 years ago was mentioned where a dispute between other tribes in terms of the boundary was referred, and this has been used as a piece of territorial map evidence in claim processing. During the king's rule, he had given the Juangs' 'Nistar' rights for the forest. The Juang are divided into four clans. Satkhand clan: used to serve the king by giving him all the pulses they used to grow in their forest lands. Along with that, they also used to give the castle to the king for the feast. Jharkhand clan: used to provide the brooms which were collected by them from forests. Rebna clan: used to give the Basmati rice grains to the king. Kathua clan: used to provide all the firewood needed for the palace and the king. They also offered woods and ropes for chariot construction during the great Rath Yatra time. And in return, they were free to use the forest resources they had during the King's time. They had the exclusive rights towards timber extraction in the forest, and complete administration of forest was done by the tribe with minimal external interference for the administration of forest. These two were the primary evidence for common boundary and ancestral rights, respectively.

*The proposed action plan for habitat rights*



**Figure 1: the action plan flow diagram**

**Forest management**

The village settlement was loose and irregular than the linear single street model. The community lived in hamlets, carefully ensuring the maximum availability of land for cultivation. This clan coming together and living will help the efficient use of cultivable and homestead property. The majority of the forest was baby forest having trees of 5-10 years approximately. When asked, it was told that the land was given by the revenue department to the forest officials as part of compensatory afforestation. The compensatory afforestation has resulted in many villagers losing the usufruct land which they had been using for shifting cultivation earlier.

**Table 3: transect walk analysis**

<b>Resources</b>	<b>Forest produce</b>	<b>Water and water-based products</b>	<b>Domestic produce emphasis on livestock</b>	<b>Agriculture</b>	<b>Cultural significance</b>
<b>Activities</b>	Collection of food, grazing for fodder, firewood collection	Water for daily use and drinking, Bathing, washing, fishing	Taking them for grazing and collecting dairy products and eggs from goats, cows, and hens	Working in the fields and identifying and clearing a patch of land for shifting cultivation	Worshipping the rivers, trees, and hills in the forest as part of the tradition.

<b>Problems</b>	Rights not obtained till date	Not perennial	Restriction on grazing in the reserve forest	Yield is reducing due to a small rotational period.	The forest is cleared for scientific forestry and check dams constructed by the forest department.
<b>Strengths and opportunities through forest rights</b>	Forest rights allow them to get community rights for the forest range	Making canals by cutting streams to the main river will help in agriculture	A cooperative will help in generating more income for the community	Habitat rights would help them to practice agriculture	Protection from external influences on encroachment of sacred groves
<b>Perception</b>	Cannot survive without forest	Life is depended on the river	It's a safety resource when forest and agriculture fail to feed them.	Cannot practice swidden cultivation as land under the community holding is reducing	Destruction of sacred grooves is a symbol of the kalyug or end of the world.

#### IV. CONCLUSION

The forest depended community strongly believes that they are the original inhabitants of the forest and consider the forest as their mother. They worship the river, hills, and the trees in the forest and live in harmony with the forest. The communities for generations have conserved and lived sustainably with the forest and there is no need to scientifically prove their conservation and management plans to get community rights as they have more sustainable knowledge than urban dwellers. The rights would allow forest depended on communities to live like in olden times when the king gave them the entire rights of the forest which would ensure the safeguards of the forest. The forest is secure in the hands of the tribe and all we need to do is ensure nobody else tries to influence or threaten their living. If we reduce the influence of external forces, then the community will thrive in conserving the forest. Our forests have continuously degraded under British and then under democratic rule by promoting commercial or scientific forestry. The plantation forestry has always degraded the ecological balance of the forest and with the management, in community hands who uses forest for sustenance purposes, it is logical to believe that the biodiversity of the forest will increase.

The use of community land for cultivation is also managed by the community on the common rationale of human thinking. The equity which every country deems utopian is simply practiced here. The socialistic thinking of the needy gets more is reflected in every community decision like the farmland given based on mouths to feed and the common understanding that humans are susceptible to profligacy is the reason behind restricting the community from farming twice in a year in the allotted land. These are the traits that we lost in the evolution from prudent socialist to turpitude capitalists.

The sites which are worship places in the forest for Juangs are the perfect examples of how religions can help in biodiversity conservation. Unlike the modern religion which belief in worshipping an unknown, the Juang tries to connect the supernatural to the mightiness of the forest. If you observe the religious sites in the forest, they act as a separate ecosystem that is rich in biodiversity. The trees and river streams which are worshipped are conserved and guarded by the tribe. The tree species of the genus *Ficus* to which belong to Banyan and Peepal is one of the keystone resources for the community in Asia and Africa (Gadgil & Guha, 2000).

The tribes are territorial and they strongly guard their territory. This has been a standout trait in every tribe all over the world. In new Guinean highlanders defeat and drive away a neighboring group from its territory, the conquerors do not occupy this territory. They cut valued fruit yielding trees from the conquered group's territory, thereby rendering it far less desirable for decolonization by the conquered. The actual territory may be physically occupied only later if it's not reoccupied by the vanquished group (Rappaport, 1984). In Juang territory there have been cases of disputes over territory with neighbors and these territorial disputes are provided as the pieces of evidence for demarcation of customary boundary in the claim process. According to Durkheim, "Religion is an interdependent system of beliefs and practices regarding things which are sacred, that is to say, apart forbidden, beliefs and practices which unite all those who follow them in a single moral community" and for tribes, the beliefs, practices, and sacredness are intertwined with nature vehemently. The Cautin River begins as a trickle in the volcanic mountains of central Chile and runs through the heart of

indigenous Mapuche territory. They in their ceremonies and prayers invoke the spirit of the rivers and the spirit of the mountains. Water is life to them, its spiritual being gives them strength which connects their dependency on the natural resources to conservation through their belief systems. This story from Chile is breathtakingly resonated in Keonjhar too. The two tribes which don't even know each other's existence are intermittently following the same traditions and facing the same threats of crony capitalism.

The Juang community has managed the forest of Gonasika for generations before independence during the king's rule and they believe that they can manage the resources if the government can guarantee that there will be no external influences from various sources such as forest or revenue department and private mining and extraction companies. The major problem faced by the forests of Orissa is different stakeholders having contradictory interests and an uncoordinated effort for the greater good. The forest policies have not been effective in raising the quality of the forest and the livelihood of rural people (Sarap, 2007). Orissa comprising of 24 princely states and part of three ex-colonial provinces, has a complex history of forest governance. The princely states and provinces had different forest laws and policies. In 1972, the Orissa forest act (based on the Indian forest act 1927) was passed, superseding prior laws in an attempt to bring uniformity to forest governance. Thus the legal forests of Orissa have emerged as the consequences of a mosaic of laws and policies over the last century. However, the non-recognition of the critical dependence of forest communities on forests and forest land, and the consequent denial of their rights has been constant in this complex process (Kumar & Choudhary, 2005). The non-recognition of rights on shifting cultivation land has resulted in community losing lands to government in the name of compensatory afforestation in Keonjhar. After independence, the government of Orissa did not recognize the shifting cultivation as legitimate land use and settled all shifting cultivation areas including forest land, as government land (Kumar & Choudhary, 2005). This led to the criminalization of the community practices of swidden agriculture, threatening one of the main sources of livelihood of the Juang community.

The FRA process in Juang Pirha can help us to understand the intricacies of the forest-dwelling communities and especially into the manner of living amongst the primitive tribal groups. The community as a whole are laggards when it comes to tedious bureaucratic procedures and they believe these are beyond their comprehension. The NGOs play a major role in helping the community in getting their rights in the forest.

The introduction of IFR is slowly making the community think differently. Individualism, a social theory favoring freedom of action for individuals over collective action is evolving in the hamlets of Juangs. The community emphasis on the collectivist culture can be seen in different walks of their life. For example, every village or hamlet has a community hall called Majang where they gather every evening to connect. They have a community building for youths to stay so that they can inculcate a community bond between the youth. The land is divided among the community for agriculture through a series of Gramsabha meetings where every family put forward their needs and community as a whole decides the division of land.

Introduction of IFR titles means that the community cannot practice shifting cultivation anymore as they cannot afford to leave their land uncultivated because of the dependency of the whole family on the farmland. The community interference and distribution of land according to the need is no longer feasible as every community member has got individual land. From an outsider's perspective, we cannot decide whether collectivism is better than individualism for the tribe or vice versa but one thing we can observe is that the IFR has fastened the process of the transition. The low power distance culture can be predominantly observed in the tribes of Gonasika. The relationship between Sardar or the headman and the community is a great example of a low power distance community. Low power distance cultures challenge authority, encourage a reduction of power differences between management and employees, and encourage the use of power legitimately (Hofstede, 2001) in this case between headman and the villagers. The community is also understanding the rights and learning about the rights and a sudden transition from slash and burn to settle agriculture can create a temporary phase of confusion.

### **Habitat rights**

The complete understanding of the rights is supposed to be done considering various parameters for PVTGs and habitats. The operational definition of habitat states that "Habitat constitutes the customary cultural, ecological and social territory of a tribe which does not necessarily comprise a compact or bounded geographical area. Habitat rights may be defined as a bundle of rights that relate to livelihood, social, cultural, and religious practices of tribal communities embedded in the territory comprising their habitat. This rights regime is mediated by their various forms of traditional institutions and leadership base who play a crucial role in multiple affairs of the tribe. Many such rights are not necessarily exclusive to one community and may be shared with other communities living in the habitat area based on age-old traditions of mutuality and reciprocity". The CFR is talking about the rights of a hamlet or village but habitat rights are for the whole community.

The important point to consider here is

- Tribe: the community for generations is claiming a certain stretch of land as their territory and this customary boundary should be considered as the habitat for them.
- Socio-cultural practices: the sacred sites of the forest should be under community ownership and the area of worship can be used as a piece of evidence for any claim processes for tribes.
- Resource sharing: the forest where community rights are given should have proper resource sharing with all the stakeholders. The revenue, forest departments should also have their fair share on the right for resources but with approval of Gramsabha. A paradigm shift in the powers from the government to the community is the biggest factor of forest rights
- Livelihood: the community practices shifting cultivation and the forest is the main food basket for their subsistence and the community should be given rights for practicing slash and burn in the forest land with a management plan incorporating the indigenous knowledge on ecological conservation.
- Natural markers which the community identifies as their customary boundary should be considered for the recognition of the rights
- The ancestral knowledge and ways of management are to be laid down as the management plan for the plan thus reviving the century-old practices which are endangered with the threat of modernization.
- Their traditional knowledge about the land on the availability of flora and fauna in different parts of their territory is proof of their customary boundaries and their knowledge base on the potential herbal medicines.
- All the historical studies conducted on the tribe will give an insight into the tribes and their right in the forest which they are residing for generations.

The main rights embedded in the habitat rights are

- Right to perform religious or cultural rites over the geographical locations related to their clans
- Right to protect and conserve such natural entities/sacred areas
- Right to protect and conserve places of their religious and spiritual importance (irrespective of their distance from the actual settlement of PVTGs) from any modification or destruction.
- Rights over existing cultural sites and the right to decide and identify newer sites for holding their rituals/cultural events in the future.
- Right to practice their traditional systems of agriculture and other livelihood sites in and around forests where they have regular, periodic or seasonal access.

Many of the forests produce are still unknown to the larger society due to a lack of knowledge about their utility and methods of processing and storing. The tribes, on the other hand, have extensive knowledge about the forest food and the local ways to preserve the food for the harsh times.

## REFERENCES

- [1]. Odisha Forest department. (2017). Annual Report.
- [2]. Baginski, O. S., & Blaikie, P. (2007). forest people and power:the political ecology of reform in south Asia.Earthscan forestry library.
- [3]. Bose, S. (1961). Land use Survey in a Juang Village. In Man In India (p. 173).
- [4]. Commission, G. P. (2003). Government of India Report.
- [5]. Department, G. F. (2017). Annual Report. Ahmedabad.
- [6]. Dras, O. (1985). The hema system of range reserves in the Arabian peninsula: its possibilities in range improvement and conservation projects near east.Dublin: Croom helm.
- [7]. Dutta, A. (2016). Improving the Quality of Life of Marginilaised Community in Chattisgarh.
- [8]. Elwin, V. (1964). The Tribal World of Verrier Elwin.
- [9]. FAO. (2007). FAO report on India.
- [10]. Forde, C. (1963). Habitat,Economy, and Society: A Geographical Introduction to Ethnology. New York: Dutton.
- [11]. FSI. (2003). Forest Survey of India.
- [12]. Gadgil, M., & Guha, R. (2000). the use and abuse of nature. oxford.
- [13]. GOI. (2000). Government of India. census 2001.
- [14]. Goldschmidt, W. (1979). A General Model for Pastoral Social System' Pastoral Production and Society. Cambridge: Cambridge University Press.
- [15]. GoO. (2011). Government of Odisha: census. <https://kendujhar.nic.in/economy/>.
- [16]. Grigg, D. (1980). The Agricultural Systems of the world: An Evolutionary Approach. Cambridge: Cambridge University Press.
- [17]. Hofstede, G. (2001). Culture's Consequences. SAGE.

- [18]. hunter, w. w. (1872). Orissa or the vicissitudes of Indian province under native and British rule.
- [19]. India, G. o. (2011). Census of 2011. Census.
- [20]. ITTO. (2006b). international tropical timber organization.
- [21]. Kardulias, N. (2016). The Ecology of Pastoralism.
- [22]. Karnataka, F. d. (2018). Annual Report 2017-18.
- [23]. Khazanov, A. (1984). Nomads and the Outside World. Cambridge: Cambridge university press.
- [24]. Khosla, A., & Bhattacharya, P. (2018). Tracking the Implementation of Forest Rights Act, 2006, and Its Impact on the Livelihood of Forest Dependent People in the State Of Tripura, India. *IOSR Journal Of Humanities And Social Science (IOSR-JHSS)*.
- [25]. Kohli, K. (2019). Supreme Court Ruling on FRA. EPW.
- [26]. Kumar, K., & Choudhary, P. (2005). A Socio-Economic and Legal Study of Scheduled Tribes' Land in Orissa. Vasundhara.
- [27]. Kumar, K., Singh, N., & Kerr, J. (2014). Decentralization and democratic forest reforms in India: Moving to a right-based approach. Elsevier.
- [28]. Lal, P. (1974). The Tribal man in India: a Study in the Ecology of the Primitive Communities. *Ecology and Biogeography in India*.
- [29]. Leeds, A., & Vadya, A. (1965). Man, Culture, and Animals: The Role of Animals in Human Ecological Adjustments. Washington: American Association for the Advancement of Science.
- [30]. Madegowda. (2018). ATREE website.
- [31]. Mathur, K. (2013). Public Policy and Politics in India: How Institution Matter. Oxford.
- [32]. MOEFCC. (2018). annual report.
- [33]. Mukerji, A. (2003). Forest Policy Reforms in India - Evolution of the Joint Forest Management Approach. fao.
- [34]. Mundoli, S., Joseph, G., & Setty, S. (2015). Trends in Farming and Livelihood Activities among Soligas in Tiger Reserve. *Agroecology and Sustainable Food Systems*.
- [35]. Nadaf, H., & Biradar, R. (2017). Regional Variation in Poverty in Karnataka: An analysis of its trends and factors contributing. *International Journal for Multi-Disciplinary research*, 359-364.
- [36]. Odisha Government. (2002). Government Of Odisha Report.
- [37]. Rappaport, R. (1984). Pigs for Ancestors. Yale University.
- [38]. Sarap, K. (2007). Forest and Livelihoods in Orissa. *Forest, People, and Power*.
- [39]. Setty, R. S., Bawa, K., Ticktin, T., & Madegowda, C. (2008). Evaluation of a Participatory Resource Monitoring System for Nontimber Forest Products: The Case of Amla Fruit Harvest by Soligas in South India. *Ecology and Society*, 13-19.
- [40]. Sharma, V. P., Kohler-rollefson, I., & Morton, J. (2001). Pastoralism in India: a Scoping Study.
- [41]. Stanley, O. D. (2004). Wetland Ecosystems And Coastal Habitat Diversity In Gujarat, India. *Journal of Coastal Development*, 46-64.
- [42]. Thadathil, A. (2017). Socio-Economic Inclusion of Nomadic Tribes: A Case Study of Malai Pandaram in Kerala. academia Edu.
- [43]. Vasundhara. (2015). Notes on Alienation of Juang communal Lands by the State in Juangpirh, Orissa. Vasundhara journal.

Abee Narayan. "Significance of the Forest Rights Act, 2006 and its implementation in forest-dwelling communities of India." *IOSR Journal of Humanities and Social Science (IOSR-JHSS)*, 25(4), 2020, pp. 35-42.