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LEGAL LIMITATIONS: IN THE LIGHT OF MURIA TRIBE

AUTHORED BY - SANTWANA CHILLA, NALSAR 2026

Abstract

The Muria Tribe, hailing from Chhattisgarh, are finding themselves in an uncertain predicament due to internal displacement across the adjacent states of Andhra Pradesh, Odisha and Telangana. This research paper examines the legal complexities surrounding the Muria tribal group, who have the nomenclature of Gutty Koya in the migrated states of Telangana and Andhra Pradesh. The Muria tribe is a marginalized indigenous community that has been affected by the violence resulting from a crossfire between Maoists in the forest area of Chhattisgarh and the state-sponsored militant group, Salwa Judam. After multiple instances of violence, the community fled to undivided Andhra Pradesh and Odisha. According to local tribes, the Murias of Chhattisgarh and Gotti Koyas of Khammam district belonged to one clan, even though they lived in different states and had different names. Murias have the status of a scheduled tribe in the state of Chhattisgarh but lost their title due to forced migration to the neighboring states. Focusing on their loss of scheduled tribe status during migration, the study analyses the issue in the light of Action Committee v. Union of India. The study attempts to critique the effectiveness of area limitations and highlights governmental reluctance to recognize internally displaced tribal identity.

In the present paper, we will be asking a few questions about the law that is present in the country, and its implications for the most marginalized people of the country. The paper will look at the reasoning and the criteria that were taken into consideration while curating the Schedule tribe list and the situation of migrants and their legal status as tribal members while simultaneously looking at the slight but significant distinction between voluntary migration and internal displacement. This paper further advocates for tailored legal reforms that address the unique challenges of involuntary displacement and ensure the protection and inclusion of marginalized communities within the framework of social Justice.

Introduction

The mass migration of approximately 20,000 Murias¹, from Chhattisgarh to the neighboring states of erstwhile Andhra Pradesh and Odisha² unveils a poignant chapter of displacement and societal upheaval. The consequences of this movement have been multifaceted, impacting not only the displaced community but also triggering tensions and challenges in the receiving regions. The division of the Murias into East Godavari district in Andhra Pradesh³ and the more substantial presence in Telangana's Khammam district⁴ reflects the intricate nature of their dispersal. However, this migration has not been without complications, as the state-recognized Adivasis in Khammam, known as Koyas, faced threats and challenges due to the influx of Muria tribals.⁵

The root cause of this internal displacement⁶ lies in the crossfire between Chhattisgarh and Andhra Pradesh, compounded by Maoist activities in the Bastar and Dantewada regions. What began as a movement protesting against wealthy landlords evolved into a struggle for power.⁷

The Maoists, initially supported by the CPI, witnessed a shift with the establishment of Salwa Judum⁸, a state-sponsored counterinsurgency operation.⁹ This drastic change compelled the Adivasi community, including the Murias, to become involuntary participants, forced into the frontline of the "war on Maoists."¹⁰ As the movement transformed from peaceful protest to violent measures, the Murias sought refuge in neighboring states, indicating the harrowing impact of the conflict on their lives. The years 2005 to 2007 witnessed an accelerated influx of Murias into Andhra Pradesh and Odisha¹¹, signifying the urgency and intensity of the situation.

¹ Mamidi Bharat Bhushan, Study on the Identity & Socio cultural integration of Gutty Koya Tribals in Jayashankar Bhupalapally, Telangana, Save The Children 23 (2017), https://www.academia.edu/63837986/Identity_of_IDPs_and_Socio_Cultural_Integration_of_Gutty_Koya_Tribe.

² Swamy et al., *The Fragile Livelihoods of the Murias in Telangana and Andhra Pradesh* 48(4), SOCIAL CHANGE 528, 529 <https://doi.org/10.1177/0049085718801412>.

³ Thunga Ramesh, *Problems and Prospects of Gutti Koyas 3* THE LAW BRIGADE PUBLISHERS 100, 101 (2022), <https://thelawbrigade.com/wp-content/uploads/2022/12/Thunga-Ramesh-AJMRR.pdf>.

⁴ *Supra* note 1 at 5.

⁵ Centre for Social Justice, *A study on internally displaced persons of India Mapping and Citizenship Rights* 18 (June 20, 2013), https://www.centreforsocialjustice.net/wp-content/uploads/2015/12/A_Study_on_Internally_Displaced_Persons_of_India.pdf.

⁶ *About Internally Displaced persons*, UNHR, <https://www.ohchr.org/en/special-procedures/sr-internally-displaced-persons/about-internally-displaced-persons>.

⁷ *Where the State Makes War On Its Own People*, Camp. for Peace & Just. in Chhattisgarh (2006), https://cpjc.files.wordpress.com/2007/07/salwa_judum.pdf.

⁸ 17 Rajya Sabha Deb (15th Ser.) (2011) 12 (India), https://rsdebate.nic.in/bitstream/123456789/592078/1/IQ_223_03082011_S41_p1_p6.pdf.

⁹ *Supra* note 5 at 19.

¹⁰ *Supra* note 5 at 19.

¹¹ *Supra* note 5 at 20.

This migration narrative underscores the interconnectedness of socio-political factors, armed conflict, and displacement. The Murias, grappling with the consequences of external conflicts, were compelled to seek safety in unfamiliar territories. The ramifications of this mass movement extend beyond mere geographical relocation, shaping the socio-cultural dynamics of both the displaced and the communities receiving them.

Tribal Oppression

More than 500 scheduled tribes are notified under article 342 of the Constitution of India.¹² Forced displacement is a major concern within the Adivasi community. The reasons primarily are associated with state activities. Displacement does not exclusively feature the loss of shelter but extends to losing land and natural resources that are the basis of the economic survival of these tribal communities.

Murias have to face the brunt of the forest officials as they proceed to place themselves systematically in a privileged position among the tribals, especially in relation to those seen as outsiders belonging to a foreign state. In Telangana, the Muria community, in the initial years of their displacement, worked for various officials and non-tribal locals free of cost.¹³ They have been forced to do free work in the cotton mills, and they still claim to work for the officials and the forest department, despite having lands of their own to look after. Tribal groups suffer from various forms the oppression. However, some groups, like the Murias, are compelled to endure greater levels of oppression, constantly fearing unprovoked attacks on their property or people. Murias have witnessed their abodes get ransacked, officials destroy crops, and also have seen their women become victims of lathi-violence. A vast majority of the forceful displacement from Chhattisgarh was a consequence of the fear of death, injury, sexual violence, forcible recruitment, or regrettably, a combination of these fears.¹⁴ However, individuals belonging to the community, could not escape violence and discrimination in the migrated state as well.

The issue that brought the tribal community into the limelight in recent years is the result of the

¹² Kalpana Kannabiran, *Tools of Justice: Non-discrimination and the Indian Constitution* 242 (Taylor & Francis., 1st ed. 2013) (eBook).

¹³ *Supra* note 1 at 41,42.

¹⁴ *Supra* note 1 at 15.

Telangana government's 'Haritha Haaram'¹⁵ project. This is an afforestation program to increase the present tree cover from 24% to 33% and aims at making the State a "green city" that covers at least one-third of the State's geographical areas.¹⁶ With the same aim in mind, the Chief Minister of the State has stated that the lands should be given to the government so that the forests can flourish again. This led to conflict between Podu (Slash and Burn agriculture) cultivators and the forest department. The program protects tribal communities listed in the State of Telangana¹⁷ by ensuring that the uncertainties on their livelihood are looked after as per the rights given by way of the Forest Rights Act and the Constitution. The same situation cannot be extended to the Muria tribal community, who do not have a legal claim over the lands they have been cultivating for 20 years now. They are viewed to be encroachers who are illegally living in the area and have been evicted from their dwelling places by the forest department. The tribal encroachment is seen to be an obstacle for the Telangana government to promote the Afforestation program.

The fact remains that the Telangana government and its officials have been moving forward with infrastructural developments like the construction of flyovers, highways, and colossal malls, which extend to 15 acres. Non-tribals in Telangana have occupied many acres of land for which they are rarely held accountable because the people involved have power political affiliations and are not vulnerable to the legal system. On the other hand, the acquisition of the tribal land is justified on the premise of benefiting the public in large. However, on the contrary, tribals, markedly internally displaced tribal communities, like the Murias, are susceptible to government developmental programs, negatively.¹⁸

History of Scheduled caste and Scheduled Tribe list

The transformation of the Scheduled Tribe list from its inception in 1950¹⁹ to its current iteration signifies a nuanced understanding by the state that not every tribe necessitates or should be treated with special consideration. The initial categorization as "primitive tribes"²⁰ eventually evolved

¹⁵ Ayesha Minhaz, *With no place to call home, the Gutti Koya tribe fights for survival*, FRONTLINE, THE HINDU (Dec 29, 2022), <https://frontline.thehindu.com/social-issues/with-no-place-to-call-home-the-gutti-koya-tribe-fights-for-survival/article66281629.ece>.

¹⁶ *Id.*

¹⁷ GoI Minister of Social Just. & Empowerment, State wise/UT-wise of Scheduled Tribes in India, 1, 11(2023), <https://tribal.nic.in/ST/LatestListofScheduledtribes.pdf>.

¹⁸ *Supra* note 12 at 257.

¹⁹ The Const. (Scheduled Tribes) Order, 1950, MoL, 40 (1950).

²⁰ Department of Social Sec., *Revision of the lists of scheduled castes and scheduled tribes* 7 (1965), <https://tribal.nic.in/downloads/Statistics/OtherReport/LokurCommitteeReport.pdf>.

into the term "backward tribes."²¹ A pivotal moment in this evolution occurred with the Lokur Committee's scrutiny of the criteria for designating tribes as Scheduled Tribes in 1965. This committee emphasized the significance of traits such as primitiveness, the distinctiveness of culture, geographical isolation, and a collective reluctance to engage with the broader community.²² It concluded that tribes whose members significantly integrated with the general population should be ineligible for inclusion in the Scheduled Tribe list, aligning with the provisions outlined in Article 342 of the Constitution of India.²³ Concurrently, special schemes and social welfare programs were implemented to uplift Scheduled Castes and Tribes, ensuring their overall well-being paralleled that of other sections of society. The committee also acknowledged that if the population of a tribal group was too minimal to be considered a community, inclusion in the list might be impractical.

Turning our attention to the Muria tribe, inhabiting the forested regions of Telangana and Andhra Pradesh, we find a community characterized by a rich and unique culture steeped in customary rites, traditions, and beliefs. Notably, their cultural practices, such as the Gaur dance²⁴ and the amalgamation of animistic and Hindu doctrines, contribute to the distinctiveness of the Muria tribal group in Chhattisgarh. Despite the cultural richness, governmental recognition of the Muria community was a belated development, highlighting a historical oversight.²⁵

However, a more pressing concern surfaces as we delve into the plight of the Muria tribe. The forced displacement of as many as 55,000²⁶ from Chhattisgarh to the forested areas of Andhra Pradesh has led to severe neglect of their rights. The initial stages of displacement were marked by a lack of acknowledgment and humanitarian support for the tribal society. Instances of demolitions and violence perpetrated by forest officials further exacerbated their vulnerability. Despite the intervention of non-governmental organizations (NGOs) and human rights groups²⁷, the marginalization and violence against the tribals persisted.

Compelled to resettle in the interior forest areas, the Muria tribe lives in a state of perpetual fear

²¹ *Id.*

²² *Id.*

²³ INDIA CONSTI. Art. 342.

²⁴ *Supra* note 2 at 528.

²⁵ *Supra* note 3 at 107.

²⁶ Shubhranshu Choudhary, *Time to rehabilitate Gutti Koyas*, TELANGANA TODAY (June 29, 2022), <https://telanganatoday.com/opinion-time-to-rehabilitate-gutti-koyas>.

²⁷ *Supra* note 1.

and distress, devoid of a sense of belonging in their displaced state. The forested areas they now inhabit are isolated, and their interactions are confined to forest officials, police, NGOs, and human rights organizations.²⁸ What amplifies their plight is the lack of legal recognition as a scheduled tribe, even though they unequivocally meet the criteria outlined in Article 342 of the Constitution of India.²⁹ This denial of recognition subjects the Murias to heightened marginalization, violence, and discrimination compared to other listed Adivasi tribes in Telangana and Andhra Pradesh.

The underlying narrative echoes the need for comprehensive recognition and protection of the rights of marginalized tribal communities, particularly those who have undergone involuntary displacement. The complexities of their struggles underscore the imperative for systemic changes, legal amendments, and proactive measures by both state and central authorities to rectify oversights and provide equitable opportunities for these communities to thrive and preserve their dignity and legal status, that they are rightly entitled to under the Constitution of India.

Area Limitations

The Lokur committee established that there had been great criticism, both within the parliament and outside, that the area restrictions and limitations hamper social mobility as the communities concerned would confine themselves to the specified areas as they would be trading off their privileges and benefits by moving out.³⁰ With this covert constitutional restriction in place, it acts antithetical to the policy of social integration, and the advocacy of abandoning their isolation and promotion of intermixing of their groups with the rest of the population becomes a task that becomes difficult to achieve. After appreciating the considerations, the area limitations were removed by every State and Union territories.³¹

The report also considers whether, in a situation where a caste or a tribe that is listed as a scheduled caste or a scheduled tribe in a particular State or a Union territory, would be recognized as an SC or an ST in the migrated state.³² Having an all-India list for Scheduled castes and

²⁸ *Supra* note 5.

²⁹ *Supra* note 23.

³⁰ Department of Social Sec., *Revision of the lists of scheduled castes and scheduled tribes* 7 (1965), <https://tribal.nic.in/downloads/Statistics/OtherReport/LokurCommitteeReport.pdf>.

³¹ Department of Social Sec., *Revision of the lists of scheduled castes and scheduled tribes* 7 (1965), <https://tribal.nic.in/downloads/Statistics/OtherReport/LokurCommitteeReport.pdf>

³² Department of Social Sec., *Revision of the lists of scheduled castes and scheduled tribes* 12,13 (1965), <https://tribal.nic.in/downloads/Statistics/OtherReport/LokurCommitteeReport.pdf>

Scheduled tribes is not feasible from the constitutional point of view, as articles 341³³ and 342³⁴ specify the method of recognizing Scheduled Castes and Scheduled Tribes with respect to each individual state through the consultation of their respective governors. The report proceeds to state that the problem or the issues that arise is not of great significance and not so serious as to bring about a constitutional amendment.³⁵ This report fails to consider large forced internal “migrations” that take place due to civil uncertainties. The report primarily considers displaced persons to be individuals who traveled to India from East Pakistan. Through investigations, Assistant Commissioners concluded that the social disabilities seen in the communities of Scheduled Castes and Scheduled Tribes were non-existent. These communities received substantial benefits under rehabilitation schemes,³⁶ better than what was awarded to the Scheduled Castes and Scheduled Tribes in the respective states.

The committee and the constitution acknowledged the importance of policy decisions directed towards the upliftment of displaced individuals from Pakistan. Murias endure disabilities in relation to the officials and the Koya tribe of Telangana which was considered as one of the requirements to conclude the displaced people from Pakistan have a dignified and protected life. It has also been noted that the displaced people have gotten substantial benefits under rehabilitation schemes, on a scale better than those normally afforded to the scheduled castes in the state concerned.³⁷ Murias, on the other hand, have not seen any development. They face the same plight and have not been enabled with significant policy decisions for their upliftment. In addition to the entire tribal community losing its legal recognition as a scheduled tribe in the migrated state, there is a looming threat of displacement, once again. If it were not for The High Court of Telangana’s intervention,³⁸ the Muria tribe would have been victims of the ambitious “Haritha Haaram” project. Listing Murias as Scheduled tribes of Telangana is a necessary step in the right direction, which is to be considered by the Telangana Government.

³³ INDIA CONSTI. Art. 341.

³⁴ *Supra* note 23.

³⁵ Department of Social Sec., *Revision of the lists of scheduled castes and scheduled tribes* 14 (1965), <https://tribal.nic.in/downloads/Statistics/OtherReport/LokurCommitteeReport.pdf>.

³⁶ *Id* at 17, 18.

³⁷ *Id* at 18.

³⁸ *Supra* note 26.

Action Committee on Issue of Caste Certificate to Scheduled Castes and Scheduled Tribes in the State of Maharashtra and Ors.

V. Union of India (UOI) and Ors.³⁹

In this particular case, the State of Maharashtra denied extending benefits and rights that were available to Scheduled tribes and Scheduled Castes of the State to the Scheduled castes and Scheduled Tribes of another state who have migrated to Maharashtra. The issue before the court was whether the petitioner was entitled to avail the upliftment benefits of being a scheduled Caste and Scheduled Tribe in Maharashtra when the said individual had a scheduled caste certificate from Andhra Pradesh. After discussing articles 341 and 342 of The Indian Constitution, the court concluded that the president, with the consultation of the governor, is the only official who is competent to recognize the tribals that are to be named as Scheduled Caste or scheduled Tribe. Without the notification of the same, a tribe or a person belonging to a scheduled caste claiming to have the same rights as an ST or SC in the migrated State was deemed to not be allowed to claim the same. For the same reason, the petitioner was not entitled to admission under a reserved quota.

The conclusion that has been arrived at by the court emphasizes the importance of the notification to enroll a particular Caste or Tribe into the State's list. Such notification is necessary for the individual or the group, in its entirety, to be able to enjoy the enabling provisions given to the STs and SCs in the migrated State.

The court in this case, and the succeeding cases,⁴⁰ relied on the same ratio, which extensively relied on the premise that "through migration, the individual or the group has a better and more socially free and liberal atmosphere, and if a sufficiently long time is spent in socially advanced areas, the inhibitions and handicaps suffered by belonging to a specifically disadvantageous community do not truncate their growth and the natural talent of an individual gets the full scope to blossom and flourish."⁴¹ This is highly presumptuous of the Supreme Court when the same argument is extended to the Muria community, who have been persecuted from their primal State and have been equally, if not exponentially, marginalized in the migrated states of Andhra

³⁹ Action Committee on Issue of Caste Certificate to SCs/STs v. Union of India, (1994) 5 S.C.C. 244 (India).

⁴⁰ Marri Chandra Shekhar Rao v. Seth G.S. Medical College, (1990) 3 S.C.C. 130 (India); S. Pushpa v. Sivachanmugavelu, (2005) 3 S.C.C. 1 (India).

⁴¹ *Supra* note 39 at 258.

Pradesh, Odisha, and Telangana in particular.

The loss of identity experienced by internally displaced tribal individuals diverges significantly from that of non-tribals. When tribal groups are forcibly uprooted and relocated to a different state, they find themselves compelled to shed their tribal status, a distinction that holds particular significance. This transition from being recognized as tribals in their native state to assuming a non-tribal identity i.e., not securing enabling provisions or welfare schemes in an unfamiliar region, amplifies the challenges faced by internally displaced tribals. The disadvantage becomes glaringly apparent when one considers that the privileges and legal rights provided in their original state transform into a disadvantage in the new state, even though the circumstances of primitiveness and backwardness, as stated in article 342 are still prominently a characteristic feature of the tribal group.

In contrast, the experience of the average citizen undergoing migration, seeking educational opportunities or employment benefits, does not typically involve a fundamental change in social status. The benefit and entitlements accessible in the original state persist unchanged even after migration. Mobility is not constrained, and migration is indeed seen as a development process. The migration of backward communities, particularly tribals, entails inherent tradeoffs, with the challenges becoming even more pronounced in instances of forceful displacement. Migration for Murias was not an act that was viewed to be beneficial; rather, it served as an escape from violence, a quest for refuge, and is marked by the absence of legal recognition as a scheduled tribe. It is driven by the imperative to secure lives as a desperate response to state-sponsored violence and eviction rather than a pursuit of economic or occupational advancement.

The court, as a custodian of justice, holds the power to mandate states and institutions responsible for recognizing these displaced communities to make requisite amendments. The absence of such directives may inadvertently position the law as an instrument that, instead of safeguarding the marginalized, inadvertently facilitates institutional practices that perpetuate social hierarchies. This raises concerns about the efficacy of the legal system in ensuring equitable treatment for certain societal groups and enabling their upward mobility, especially when confronted with systemic challenges.

MIGRATION AND INTERNALLY DISPLACED PEOPLE

Migration, on the global stage, is a comprehensive term encompassing various forms of movement. The International Organization for Migration defines a migrant as an individual who relocates from their habitual residence, whether within national borders or across international frontiers, either temporarily or permanently. This movement can be prompted by a multitude of factors. Internal migration, on the other hand, pertains to individuals who move within a country's borders, irrespective of the reasons motivating such relocation.⁴²

The *World Refugee Survey* estimated the total number of IDPs in India to amount to 507,000, whereas the Global DIP Project estimates 3.9 million of the population to be displaced due to conflict-induced internal displacement.⁴³

The court delves into the intricate considerations surrounding tribes and castes sharing identical nomenclature across different states. It asserts that the specifications for such designations may differ, leading to varying degrees of disadvantages in distinct states. The court underscores that the mere inclusion of a caste as a Scheduled Caste in one state does not automatically entitle an individual from that caste in another state to the rights, privileges, and benefits accorded to a Scheduled Caste member in the latter state "for the purposes of this Constitution."

In the Action Committee case, the court presupposes that opting for migration implies choosing a more socially liberated and liberal environment, especially after spending a considerable time in socially advanced settings. However, this presumption proves flawed in the context of the Murias. Despite their migration to neighboring states since 2005, spanning 15 years, the promised development and advancement are notably absent. Many members lack essential documents such as ration cards and NREGA job cards, and educational opportunities for Muria children are alarmingly limited, as highlighted by the NGO "Save The Children."⁴⁴ Contrary to the Supreme Court's assumptions, social discrimination persists, and advancements in Muria livelihoods remain elusive.

A crucial aspect overlooked by the court pertains to whether internally displaced individuals are

⁴² *Migrants, refugees, or displaced persons*, UNESCO (Sep 23, 2021), <https://www.unesco.org/en/articles/migrants-refugees-or-displaced-persons>.

⁴³ Mahendra P Lama, *Internal Displacement in India: causes, protection and dilemmas*, OXFORD REFUGEE STUDIES CENTER (August, 2000), <https://www.fmreview.org/accountability-and-displacement/lama>.

⁴⁴ *Supra* note 1 at 26.

considered migrants. Indian census data categorizes migration reasons, including employment-seeking, better employment opportunities, migration of the family's earning member, and job loss.⁴⁵ The Muria tribe of Chhattisgarh, however, does not fit into any of these categories, as their displacement was involuntary, resulting from state-induced disruption.

The court's decision in the Action Committee case, centered on voluntary migration, does not apply to the circumstances of internally displaced people like the Muria tribal community. It prompts a crucial question: should there not be a differentiation in approach when addressing the challenges faced by internally displaced tribal groups, particularly when their disadvantages persist even in the state of migration? The principles derived from the judgment must be adapted to the distinctive challenges faced by internally displaced individuals, as their movement is not a matter of choice but, rather, a consequence of forceful displacement. The court's reliance on Ambedkar's response to Jaipal Singh, emphasizing eligibility based on voluntary migration, does not hold for internally displaced people, for whom the context of involuntary displacement necessitates a reevaluation of legal principles.

Governmental shortcoming

Article 342 of the Indian Constitution empowers the President of India, in consultation with the state's governor, to specify tribes or tribal communities as Scheduled Tribes through a public notification. In the case of the Muria tribe, whose members have been internally displaced and currently reside in Telangana, the Telangana government has the authority to recognize and recommend their tribal status to the central government.

Notably, the Telangana government has taken steps to recommend the inclusion of eleven tribes, namely Khaithi Lamada, Valmiki Boya, Mali, Chamar Mathuras, Chunduvallu, Bedar, Kirataka, Nishadhi, Pedda Boyas, Talayari, and Bharat Mathuras, into the Scheduled Tribe list.⁴⁶ However, a critical examination of the state's objectives is warranted, particularly in light of its reluctance to acknowledge internally displaced persons (IDPs) like the Murias as listed tribals.

⁴⁵ R.B. Bhagat & Kunal Keshri, *Internal Migration in the Countries of Asia* 5,7,9,10 (2020), https://www.researchgate.net/publication/343093233_Internal_Migration_in_India.

⁴⁶ *Assembly adopts resolution seeking inclusion of 10 castes in ST list*, THE HINDU (Feb 10, 2023), <https://www.thehindu.com/news/national/telangana/assembly-adopts-resolution-seeking-inclusion-of-10-castes-in-st-list/article66493854.ece#:~:text=Chandrasekhar%20Rao%20stated%20that%20Valmiki,socio%20Deconomic%20conditions%2C%20a%20ST.>

Despite the Telangana government's proactive stance in recommending multiple tribal groups for inclusion, it appears unwilling to extend the same recognition to the displaced Murias. Recognizing the tribal status of internally displaced Murias and recommending it to the central government for parliamentary approval would not be unconstitutional or objectionable. This is particularly relevant given that the Murias are already recognized as a Scheduled Tribe in their native state of Chhattisgarh.

The Telangana government's hesitancy to address the issue of internally displaced Murias, who number around 50,000, raises concerns about its commitment to recognizing and safeguarding the rights of these tribals. Shunning responsibility in this regard is not only a disservice to the displaced community but also undermines the principles of inclusivity and protection that the Scheduled Tribe status is intended to provide. Addressing the situation through proper recognition and inclusion in the Scheduled Tribe list would be a constitutional and ethical step toward upholding the rights and dignity of the internally displaced Muria community in Telangana.

Conclusion

In conclusion, the plight of the Muria Tribe unfolds a distressing narrative of forced internal displacement and subsequent marginalization. The intricate web of social, legal, and governmental challenges they face underscores the urgent need for comprehensive intervention. The distinction between voluntary migration and involuntary displacement is a cornerstone in understanding Murias' predicament. Unlike voluntary migrants seeking opportunities, the Murias were compelled to abandon their homeland due to violence, adding a layer of complexity to their legal status and identity in the new states. Legal recognition becomes a central issue as the Murias lose their scheduled tribe status post-migration. Judicial decisions, as seen in the Action Committee case, seem to grapple with voluntary migration assumptions, potentially leaving internally displaced persons in a precarious legal limbo. The need for a nuanced approach that acknowledges the unique circumstances of forced displacement is apparent.

Systematic oppression, exemplified by labor exploitation and violence, perpetuates the vulnerability of the Muria tribe. The Telangana government's reluctance to recognize their tribal status, especially in contrast to its acknowledgment of other tribes, raises questions about governmental responsibility and fairness in addressing the specific needs of marginalized

communities.

As we reflect on the constitutional provisions and potential amendments, it is clear that a concerted effort is needed to bridge the gaps in legal recognition and ensure the protection of rights for internally displaced tribal groups. Advocacy remains crucial, urging both legal and policy reforms that encompass the complexities of involuntary displacement and safeguard the dignity and well-being of communities like the Murias.

In the broader context, Murias' story serves as a poignant reminder of the challenges faced by internally displaced persons and the imperative for a compassionate and just response that upholds the principles of equality and human rights.

