

Displacement from Tiger Reserves: A Human Rights Crisis for India's Scheduled Tribes in the Name of Conservation

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Abstract

India's tiger reserves, critical for conserving the endangered Bengal tiger, have displaced numerous Scheduled Tribes (STs) from their ancestral lands, raising concerns about human rights violations. This article examines whether relocations under the Wildlife Protection Act (WLPA) of 1972, justified to protect a species threatened with extinction, breach STs' rights as enshrined in the Indian Constitution and international frameworks like the UN Declaration on the Rights of Indigenous Peoples (UNDRIP). Focusing on the Forest Rights Act (FRA) of 2006, the Land Acquisition, Rehabilitation, and Resettlement Act (LARR) of 2013, and recent displacements in the Nagarahole (2024–2025) and Ranipur (2024) Tiger Reserves, it analyzes how conservation policies often violate legal safeguards. A 2024 Rights and Risks Analysis Group report estimates 5.5 lakh displacements, underscoring the scale of the issue. The article advocates for a coexistence model, inspired by the Soliga tribe's success in Biligiri Rangaswamy Temple (BRT) Tiger Reserve, to balance ecological goals with human rights.

Key Words: Tiger, Reserves, Tribes, Human Rights, Displacement, Wildlife, Rehabilitation.

Introduction

India's tiger reserves, established under Project Tiger since 1973, have increased the Bengal tiger population to 3,682 by 2023, representing over 70% of the world's wild tigers (Press Trust of India, 2023). This success, however, often comes at the cost of displacing Scheduled Tribes (STs) from their

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ancestral lands. The WLPA mandates inviolate core areas, leading to relocations justified as essential for tiger survival. Yet, these displacements raise a critical question: Do they violate STs' human rights under domestic and international law? This article investigates this issue through the lens of the WLPA, FRA, and LARR, focusing on recent displacement cases in Nagarahole (2024–2025) and Ranipur (2024) Tiger Reserves. Drawing on a 2024 Rights and Risks Analysis Group report estimating 5.5 lakh displacements (Rights and Risks Analysis Group, 2024) and X posts documenting tribal resistance (Jenu Kuruba Tribal Community, 2025), it argues that forced relocations breach constitutional protections and proposes a coexistence model to align conservation with human rights.

Legal Frameworks: Conservation vs. Human Rights

Wildlife Protection Act (WLPA) of 1972

The WLPA of 1972 is India's primary legislation for protecting endangered species like the Bengal tiger, listed as endangered by the IUCN (World Wide Fund for Nature, 2022). Section 38V, amended in 2006, mandates inviolate Critical Tiger Habitats (CTHs), often requiring the relocation of human settlements (Government of India, 2006).

The Act stipulates voluntary relocations with free, prior, and informed consent (FPIC), scientific evidence of harm to wildlife, and adequate rehabilitation (National Tiger Conservation Authority, 2008). However, implementation frequently bypasses these safeguards. In Nagarahole Tiger Reserve, Jenu Kuruba families faced eviction attempts in 2024 without FPIC, prompting their return to rebuild villages in May 2025 (Jenu Kuruba Tribal Community, 2025).

In Ranipur Tiger Reserve, 45,000 people were slated for displacement in 2024 without evidence of ecological necessity. The WLPA's fortress conservation model prioritizes inviolate spaces, often ignoring STs' ecological contributions. The Soliga tribe's coexistence in BRT Tiger Reserve, where tiger numbers nearly doubled from 35 to 68 between 2010 and 2014, demonstrates tribes can support conservation (Rights and Risks Analysis Group, 2024).

Forest Rights Act (FRA) of 2006

The FRA of 2006 recognizes STs' and Other Traditional Forest Dwellers' (OTFDs) rights to forest land, resources, and community governance (Ministry of Tribal Affairs, 2006). Section 4(2) permits relocation from CTHs only with FPIC, scientific evidence of harm, and proof that coexistence is unfeasible, with

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Gram Sabhas overseeing decisions. The FRA's precedence in Scheduled Areas, reinforced by the Panchayats (Extension to Scheduled Areas) Act (PESA) of 1996, emphasizes tribal autonomy (Government of India, 1996).

Implementation, however, is inconsistent. In Nagarahole, Jenu Kuruba's FRA claims for community forest rights were ignored, with forest officials using coercive tactics like deploying guards (Tribal Rights Advocacy, 2024). In Ranipur, tribal communities faced relocation pressures without FRA compliance, despite stable tiger populations (Comptroller and Auditor General of India, 2024). By 2023, only 5% of community forest rights claims were recognized, per the Ministry of Tribal Affairs, undermining the Act's intent (Barpujari, 2019).

Land Acquisition, Rehabilitation, and Resettlement Act (LARR) of 2013

The LARR Act of 2013 ensures fair land acquisition and rehabilitation for STs, with Section 41 prohibiting land acquisition in Scheduled Areas without Gram Sabha consent and Section 42 mandating comprehensive rehabilitation (Government of India, 2013).

Compliance is weak. In Ranipur, displaced families received inadequate compensation and no land, violating LARR provisions (Survival International, 2024). In Nagarahole, Jenu Kuruba families reported minimal resettlement support, forcing many into labor migration (Jenu Kuruba Tribal Community, 2025). These failures highlight systemic gaps in rehabilitation enforcement.

Constitutional and International Human Rights Frameworks

The Indian Constitution protects STs through the Fifth and Sixth Schedules, restricting land transfers in tribal areas and granting Gram Sabha autonomy (Government of India, 1950). Article 21 (Right to Life) encompasses cultural and environmental rights, supporting STs' forest-based livelihoods. PESA reinforces local governance, requiring Gram Sabha consent for land decisions (Government of India, 1996).

Internationally, India's obligations under the International Labour Organization's Convention No. 107 (1957) mandate equal rights and cultural preservation (International Labour Organization, 1957). Although India has not ratified UNDRIP (2007), its principles, including FPIC and rights to ancestral lands (Article 10), are influential (United Nations, 2007).

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The UN Special Rapporteur on Indigenous Peoples' Rights notes that 50% of global protected areas overlap with tribal lands, often leading to unconsented displacements, as seen in India (United Nations, 2023). These frameworks suggest forced relocations violate human rights standards.

Case Studies: Recent Displacements in Nagarahole and Ranipur

Nagarahole Tiger Reserve (2024–2025)

Nagarahole Tiger Reserve in Karnataka has been a hotspot for recent displacement conflicts. In 2024, the NTCA intensified efforts to relocate Jenu Kuruba families from the core area, citing tiger conservation needs (Tribal Rights Advocacy, 2024). Over 52 families faced eviction without FPIC, violating the FRA and WLPA. Forest officials restricted forest access, closed schools, and deployed over 100 guards, prompting a 2025 protest where Jenu Kuruba rebuilt their villages.

X posts from May 2025 highlight their resistance, emphasizing ancestral land rights (Jenu Kuruba Tribal Community, 2025). Despite displacements, Nagarahole's tiger population grew, suggesting coexistence was viable (Ministry of Environment, Forest and Climate Change, 2023). The Jenu Kuruba's sustainable practices, like honey collection, have historically supported biodiversity, yet their rights were ignored, reflecting a pattern of human rights violations.

Ranipur Tiger Reserve (2024)

Declared a tiger reserve in 2022, Ranipur in Uttar Pradesh planned to displace 45,000 people by 2024, as reported by RRAG (Rights and Risks Analysis Group, 2024). The relocation, justified under the WLPA, lacked FPIC and evidence that tribal presence harmed tigers, whose population remained stable (Survival International, 2024). Affected STs were offered minimal compensation (Rs. 15 lakh per family) and no land, violating LARR's rehabilitation mandates (Comptroller and Auditor General of India, 2024).

The CAG criticized Ranipur's non-compliance with FRA, noting forced evictions and unchecked ecotourism in core areas (Comptroller and Auditor General of India, 2024). Tribal communities in Ranipur have coexisted with wildlife, relying on forest produce. The displacement plan, driven by tourism interests, ignored their ecological contributions, prioritizing commercial gains over human rights (Down to Earth, 2024).

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Conservation Policies and Human Rights Violations

Forced Displacement Without Consent

The WLPA's FPIC requirement is often ignored. The 2024 RRAG report estimates that Project Tiger will displace 5.5 lakh STs and forest dwellers, with 2,54,794 relocated before 2021 and 2,90,000 planned post-2021, a 967% increase per reserve (Rights and Risks Analysis Group, 2024). In Nagarahole, coercive tactics like denying forest access violated FRA and UNDRIP's consent principles (Tribal Rights Advocacy, 2024). In Ranipur, the absence of Gram Sabha consultation breached legal safeguards (Comptroller and Auditor General of India, 2024). A 2019 Supreme Court order to evict over one million forest dwellers, later stayed, underscored the scale of this issue (United Nations, 2023).

Inadequate Rehabilitation

Rehabilitation under WLPA and LARR is inadequate. The NTCA's Rs. 15 lakh per family package is insufficient, and land scarcity hinders resettlement, with 1,01,844 families awaiting relocation at a cost of \$1,853 million (National Tiger Conservation Authority, 2023). In Ranipur, displaced families received barren lands (Survival International, 2024). In Nagarahole, Jenu Kuruba faced similar neglect (Jenu Kuruba Tribal Community, 2025). These failures violate LARR's comprehensive rehabilitation mandate and Article 21's right to dignity.

Criminalization and Violence

Conservation efforts have led to violence. RRAG documents extra-judicial killings, torture, and arrests in tiger reserves, with hundreds of alleged poachers killed in Kaziranga between 1985 and 2014 (Rights and Risks Analysis Group, 2024). In Nagarahole, Jenu Kuruba faced intimidation and detention in 2024 (Tribal Rights Advocacy, 2024). These actions contravene Article 21 and UNDRIP's prohibition on forced displacement (United Nations, 2007).

Denial of Traditional Rights

The FRA's community forest rights are often denied. In Nagarahole, Jenu Kuruba were restricted from accessing honey and other produce (Jenu Kuruba Tribal Community, 2025). In Ranipur, similar restrictions forced tribes into economic precarity (Survival International, 2024). This violates FRA, PESA, and STs' right to self-determination.

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Recent Developments and Global Context

The 2024 RRAG report highlights that five tiger reserves, including Kawal and Satkosia, displaced 5,670 families despite having no tigers, questioning the rationale for such actions (Rights and Risks Analysis Group, 2024). The 2022 WLPA amendments strengthened wildlife penalties but ignored tribal rights, while the proposed Forest (Conservation) Amendment Act of 2023 threatens FRA safeguards (Down to Earth, 2023). A 2024 Supreme Court ruling in *Vanashakti vs. State of Maharashtra* mandated FRA compliance before protected area notifications, offering accountability (Supreme Court of India, 2024).

Globally, conservation-induced displacement is a recognized issue. The UN Special Rapporteur notes that tribal displacements often lack justification (United Nations, 2023). The World Wildlife Fund has faced criticism for human rights violations in conservation projects, emphasizing rights-based approaches (United Nations, 2023). The Soliga model in BRT, where tiger populations thrived, is a global exemplar, supported by studies showing increased tiger density despite human presence (Carter et al., 2012).

Reconciling Conservation with Human Rights

Coexistence Models

The Soliga's success in BRT demonstrates that STs can enhance conservation, with tiger numbers doubling from 2010 to 2014 (Rights and Risks Analysis Group, 2024). Their practices, like controlled burning, manage ecosystems effectively (Down to Earth, 2024). Scaling this model, per NTCA's 2023 guidelines, requires recognizing FRA rights and involving Gram Sabhas (National Tiger Conservation Authority, 2023).

Robust Rehabilitation

Rehabilitation must align with LARR, providing fertile land, housing, and livelihoods. The Nagarahole and Ranipur cases underscore the need for monitoring (Survival International, 2024; Jenu Kuruba Tribal Community, 2025). Rights and Resources International (2021) estimates that devolving governance to STs saves \$4-5 trillion globally (Rights and Resources International, 2021).

Legal Harmonization

Harmonizing WLPA, FRA, and LARR requires prioritizing FRA's precedence in Scheduled Areas and enforcing FPIC. Aligning with UNDRIP would strengthen India's commitments. The 2024 Supreme Court ruling provides a legal foundation (Supreme Court of India, 2024).

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Community Empowerment

Empowering Gram Sabhas under PESA and FRA ensures tribal agency. The Jenu Kuruba's 2025 resistance in Nagarahole reflects this potential (Jenu Kuruba Tribal Community, 2025). Community Conserved Areas, like Nagaland's, offer participatory models (Down to Earth, 2024).

Global Advocacy

International pressure, such as Survival International's 2017 boycott call, can advocate for rights-based conservation (Survival International, 2017). The Indigenous Peoples Law & Policy Program can provide legal support (Indigenous Peoples Law & Policy Program, 2024).

Conclusion

Displacements from tiger reserves, as seen in Nagarahole (2024–2025) and Ranipur (2024), violate Scheduled Tribes' human rights, breaching constitutional protections (Article 21, Fifth Schedule), domestic laws (FRA, LARR), and international standards (UNDRIP). The 2024 RRAG report's estimate of 5.5 lakh displacements highlights the crisis, with forced evictions, inadequate rehabilitation, and violence undermining STs' rights (Rights and Risks Analysis Group, 2024). While the WLPA aims to protect tigers, its implementation flouts FPIC and ecological evidence, as shown by stable tiger populations in tribal areas. The Soliga model in BRT proves coexistence is viable. By adopting coexistence models, ensuring robust rehabilitation, harmonizing laws, and empowering communities, India can safeguard tigers while upholding STs' human rights, fostering sustainable conservation.

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