



Implementation and Implications of the Forest Rights Act, 2006 on Tribal Rights: A Case Study of Munda Tribe in Jharkhand

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Abstract

As per the 2011 census, India had 104.3 million Scheduled Tribes, 94.1 million of whom live in far-flung regions. This paper aims to provide a comprehensive account of execution of ‘the Forest Rights Act, 2006 (FRA)’ that aims to protect the rights of tribals. Author has conducted this study with special reference to Munda Tribe in Jharkhand. Section 3(1)(i) of FRA grants right to “protect, regenerate or conserve or manage” the community forest resource in addition to Community Forest Rights (CFR) and Community Rights (under Sections 3(1)(b) and 3(1)(c). These rights ensure sustainable livelihoods for the community. FRA is a revolutionary law that creates a legislative foundation for institutional change in forest governance that benefits the poor. The author argues that the Act’s execution is heavily dependent on whether agencies follow its spirit or strive to hinder or minimize its effect owing to dilutions, ambiguities, and omissions. The areas of dilution, ambiguity, and omission include: (1) limited recognition of tribals, (2) insufficient implementation procedures and safeguards, and (3) rejection of claims. The author emphasizes the importance of prioritizing the settlement of CFR rights to promote meaningful community engagement in forest management. This includes activities such as habitat restoration and ensuring the protection of livelihoods.

Keywords: Tribal Rights, FRA 2006, Jharkhand, Munda Tribe, Community Forest Rights

1. Introduction

Munda Adivasi constitutes an important group in Indian socio-cultural fabric with an approximate population of 22.28 Lakh.¹ This tribal group is mostly originated from the Scheduled Areas of Jharkhand, Odisha

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¹ Ayan Bandyopadhyay et al., “A comparative demographic analysis of the Munda community in coastal region of Sundarban, West Bengal,” 11 *Journal of Research in Humanities and Social Science* 43–50 (2023).

and West Bengal.² Munda Adivasi possess a rich cultural heritage of their distinctive customs and language. They speak in ‘Mundari’ dialect.³ They possess a specific land tenure system which is characterized as KhuntKatti system which has also been recognized under Chota Nagpur Tenancy Act, 1908.⁴ KhuntKatti System ensures communal ownership of forest resources and collective rights. This Mundari custom ensures fair access to forest resources for subsistence. Ancestral rights of Munda people, rooted in pre-colonial period, are essential to their uniqueness and traditions. Nevertheless, the Munda community continues to face many challenges in safeguarding its land and resources.⁵

Land alienation in the area has incited dissatisfaction among tribal populations throughout the 18th and 19th centuries, resulting in several agitations and uprisings.⁶ The Pathalgadi movement started in 2018 in Simdega, Jharkhand, and is important in this regard that it started in villages of Jharkhand to assert tribal democratic rights to oversee forest and land resources.⁷ The Munda tribe insurrected against the government owing to disputes around land and forest access. More than one hundred villages in ‘*Khunti*’ and ‘*Simdega*’ districts proclaimed their entitlement to self-governance in accordance with decentralization statutes such as Panchayat (Extension to Scheduled Areas) Act, 1993, and FRA, 2006.

‘The Forest Rights Act, 2006 (FRA)’ recognizes the forest rights of ‘Scheduled Tribes (STs)’ and ‘other traditional forest dwellers

² Ram Dayal Munda and S Bosu Mallick, *The Jharkhand Movement: Indigenous Peoples’ Struggle for Autonomy in India* (International Work Group for Indigenous Affairs, Copenhagen, 2003).

³A.B. Ota, S.C. Mohanty and A. Sahoo, “MUNDA” (Scheduled Castes and Scheduled Tribes Research and Training Institute, 2016).

⁴ Mukesh Kumar Shrivastava, “Mundari Khuntkatti: An Institution of Customary Right over Land,” 13 *The Oriental Anthropologist* 267–80 (2013).

⁵ Nitish Priyadarshi, “Impact of Mining and Industries in Jharkhand” *American Chronicle* (2008).

⁶ Romila Thapar and Majid Hayat Siddiqi, “Chota Nagpur: the precolonial and colonial situation” *Trends in ethnic group relations in Asia and Oceania* (United Nations Educational, Scientific and Cultural Organization, 1979).

⁷ Di Chiara Correndo, “The counter-hegemonic potential of law: from the Wilkinson’s Rules to the Pathalgadi movement in India,” 1 *DPCE online* 131–56 (2021).

(OTFDs)'. However, several studies point out towards insufficiencies in FRA, 2006. Thus, the desired success has not been attained. This study is an attempt to examine the execution of FRA, 2006 with special emphasis on Munda tribe in Jharkhand. It comprehensively analyses the structure of the subject forest law and its impact on tribal population, especially on Munda tribe. With the help of data provided under previous empirical research in this area, the author has critically analyzed the FRA. Author has explained about Simdega or Pathalgadi Movement and how it is linked to poor operation of FRA.

2. Anatomy of Forest Rights Act, 2006

FRA, also known as '*the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006*' is an important legislation that identifies customary rights of the tribals and Other Traditional Forest Dwellers (OTFDs) in India.⁸ This law seeks to rectify the injustices experienced by the tribals and OTFDs in colonial as well as post-colonial period. This framework facilitates the documentation of forest rights and specifies type of proof mandatory for acknowledgement of such rights. FRA admits that tribals and OTFDs possess equivalent rights in forests alongside flora and fauna, constituting a vital component of the ecosystem.

FRA, 2006 empowers the district level committees to facilitate the communication with tribal leaders to guarantee forest rights as well as rights over its resources like land or water.⁹ Eligibility to acquire these rights is restricted to the individuals who primarily resides in forest areas and depends on forest ecosystem for their livelihoods. Under this law, a claimant may be either the member of designated Scheduled Tribe in that particular area or that individual or tribal group must have resided in the forest for a duration of 75 years at least.¹⁰ Under this Act, *Gram Sabha* is delegated with work to identify forest

⁸ Deva Prasad M and Suchithra Menon C, "Indian Forest Rights Legislation: Significance of Recognizing the Legal Pluralism for Indigenous Peoples Rights," 41 *Statute Law Review* 78–88 (2018).

⁹ Geetanjoy Sahu, "Implementation of the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Rights) Act 2006 in Jharkhand: Problems and Challenges," 9 *Journal of Land and Rural Studies* 158–77 (2021).

¹⁰ *The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, ACT NO. 2 OF 2007, 2006.*

and rights over its resources. As soon as the Gram Sabha decides upon the matter, it is forwarded to the sub-divisional as well as district levels with final authority resting with the district level committee. The tribal groups and OTFDs have the right to contest the decision of these committees in case of curtailment of their rights. According to this Act, the right over forest land is final if once granted to any individual. Additionally, this right is non-transferable and cannot be sold even to the members of that tribal group itself. Yet, it may be transferred through succession.

Under 'Section 3(1)(a)' of the FRA, tribals are entitled to claim the right to occupy and utilize forest land for inhabitation or agricultural purposes.¹¹ This right applies to forest lands possessed prior to December 13, 2005, and a nuclear household may claim a maximum of 'four hectares' of forest land. Before regulation of forest land by British colonial authorities and subsequent nationalization of forest produce by Government of India post-Independence, tribals possessed customary and traditional rights over these lands and resources. But these customary forest rights were only enforceable on the discretion of the Forest Department which substantially impacted socio-economic status of the tribals. This Act, however, targets to reinstate customary rights of tribals and OTFDs like KhuntKatti System or Bhuinhari System as already been recognised under Chota Nagpur Tenancy Act, 1908 but lacked implementation.¹²

It underscored the necessity of addressing historical injustices faced by tribals and other communities residing in forests and acknowledged their essential role in survival and sustainability of forest ecosystems. It acknowledged the tribal rights to manage forest resources, enabling them to guard, restore, preserve, and supervise community forest resource they have historically safeguarded for sustainable utilization.¹³ The FRA seeks to simplify the intricate procedure of centralized forest diversion, as outlined in the 'Forest

¹¹ Geetanjoy Sahu, "Implementation of the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Rights) Act 2006 in Jharkhand: Problems and Challenges," 9 *Journal of Land and Rural Studies* 158–77 (2021).

¹² Julufa Islam Choudhury, "Chotanagpur Tenancy Act: A Handbook On Tenancy Law In Jharkhand" (HRLN, 2015).

¹³ *The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, ACT NO. 2 OF 2007*, 2006.

Conservation Act of 1980', by enabling state governments to implement development projects on forest land to enhance essential services in local communities. Permissible development activities encompass schools, dispensaries, hospitals, fair price shops, telephone lines, minor water bodies, drinking water supply pipelines, construction of rainwater harvester, canals, roads, non-renewable energy sources, skill upgradation training centers, and community centers.

Section 4(2) of FRA delineates procedure for relocation and resettlement of individuals for conserving wildlife.¹⁴ Initial step involves demonstrating the necessity of relocation from a scientific perspective, facilitated by public consultation. The concept of '*Free Prior Informed Consent (FPIC)*' is essential for resettlement that includes compensating them.¹⁵ The FRA, 2006 has been amended several times. In its amendment rule and guidelines of 2012, the quorum for Gram Sabha was reduced from two-thirds to one-half of its members.¹⁶ Also, decisions regarding rejection or the need for modification in the claims were required to be communicated to claimants. Under this amendment rule, a procedure for identifying village forests and integrating them into broader frameworks was established. Claims categorized as non-rejection must be supported by two forms of evidence. Satellite imagery should be utilized in the management of these claims. The representation of Scheduled Tribes (STs) in the Forest Rights Committee was increased.¹⁷ Transit permits for the transportation of Minor Forest Produce (MFP) required modification, and royalties, along with other revenue associated with MFPs, were to be collected solely by these committees. The ministry informed relevant authorities following these amendments to enhance understanding of tribal groups about local environment without any risk of apprehension.

¹⁴ Geetanjoy Sahu, "Implementation of the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Rights) Act 2006 in Jharkhand: Problems and Challenges," 9 *Journal of Land and Rural Studies* 158–77 (2021).

¹⁵ Sandip Chowdhury, "Forest rights in Jharkhand: Too early to rejoice," 2021.

¹⁶ *The Scheduled Tribes & Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006, Amendment Rule, 2012 & Guidelines.*

¹⁷ *Ibid.*

Amendment Rules, 2012 to FRA proposed collaboration among Gram Sabha committees and the forest department on plans of mutual significance and shared objectives.¹⁸ Communities residing in forests possess the right to carry or transport minor forest products using any mode of transportation. No committee or individual official at panchayat, sub-division, or district level shall have power to accept, decide upon, or cast-off claims related to forest rights. It provides that committee constituted by Gram Sabha may have authority to issue transit passes for the transportation of minor forest produce. State Level Monitoring Committees were empowered to keep an account of execution of the law and to provide details about the forest/tribal communities involved. The Act empowered Gram Sabha to approve the decisions associated to issuing of licenses and allocation of proceeds for the afforestation and improvement of forest condition. Therefore, FRA has remained momentous in altering forest governance.¹⁹ and improve the relationship between forest communities and their environments on a global scale. Forest-dwelling communities have maintained socio-cultural relationships with forests for centuries, a relationship frequently disrupted by limitations on local access and forest use imposed by colonial forest governance frameworks. This caused diminished access to forests resources and damage of cultural identity of tribals. Numerous studies indicate that individuals establish a connection with forests through regular proximity, acquiring unique ecological knowledge and frequently applying it to formulate cost-effective, efficient, and impactful forest management strategies.

3. Ground Realities of FRA, 2006 and Simdega Movement by Munda Adivasi

The struggle of Munda community was exemplified by Birsa Munda in Ulgulan movement which is also known as Munda rebellion.²⁰ It aimed to ensure rights of Munda Adivasi over forest and its resources. This resulted into the enactment of ‘the Chotanagpur Tenancy Act (CNT

¹⁸ *The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, ACT NO. 2 OF 2007, 2006.*

¹⁹ Flavia Lopes and IndiaSpend.com, “‘My village, my rule’: Forest rights are fostering self-sustaining communities in Maharashtra” *Scroll.in*, 2022.

²⁰ Kumar Suresh Singh, *Birsa Munda and His Movement, 1872-1901: A Study of a Millenarian Movement in Chotanagpur* (Seagull Books, 2002).

Act)' and 'the Santhal Pargana Tenancy Act (SPT Act)'.²¹ Chota Nagpur Tenancy Act, 1908 controlled land transfer from tribal to individual of community not belonging to any tribal group. It specifically protected the rights of Mundari KhuntKattidars which is a title given to a traditional tenancy that recognizes the ownership of the tribals over forest resources and land. In 2016, the Jharkhand government came up to repeal CNT, 1908 which led to the emergence of Pathalgadi Movement in Simdega, Jharkhand.²² Projected revisions to the CNT and SPT Acts encountered significant opposition throughout the state. This effort to undermine rights generated distrust among tribals and heightened doubt towards the government. In order to increase consciousness of their rights, tribals began constructing 'Pathalgadis' that displayed provisions of certain laws. There were more than 300 villages that conformed with this practice.²³ Pathalgadi is one of the customary practices of Munda tribe which they use to exercise on the event of birth, death or any other important event of their tribal members.²⁴ However, this movement where the stone slabs were erected over the grounds written over with the constitutional provisions and provisions of PESA, 1993 as well as FRA, 2006 was particularly seen in Khunti and Simdega districts of Jharkhand.²⁵ 'Pathalgadi movement' in Simdega adopted an extra focused approach by concentrating their agitation on asserting their rights under FRA, 2006. 'Jangal Bachao Andolan (Save the Forest Movement)' played a significant role in this process, suggesting that

²¹ Amrita Mukherjee, "Customary Law and Land Rights: The Cautionary Tale of India, Jharkhand, and the Chotanagpur Tenancy Act" *In J. Hendry, M. L. Tatum, M. Jorgenson, & D. H. Wagner (Eds.), 2018.*

²² "Amendments to century-old laws on tribal rights spark protests in Jharkhand"

²³ Anupama Roy and Ujjwal Kumar Singh, "Pathalgadi Movement, Self-Governance, and the Question of 'Weak Statehood'" *Neubert, D., Lauth, HJ., Mohamad-Klotzbach, C. (eds) Local Self-Governance and Varieties of Statehood. Contributions to Political Science.* (Springer, 2022).

²⁴ Hilary Standing, "Munda Religion and Social Structure" (Unpublished Doctoral Thesis, School of Oriental and African Studies, University of London, London, 2017).

²⁵ Amarnath Tewary, "The Pathalgadi Rebellion" *The Hindu*, 2018.

the movement has been somewhat influenced by external factors.²⁶ Khunti Pathalgadis are large stone slabs that are painted green and engraved with provisions of 'Panchayats (Extension to Scheduled Areas) Act (PESA)', along with warnings for outsiders regarding entry into the village without permission. This movement asserted that tribal communities are the real owners of the forest resources. The movement was centered around the ideology of '*Jal, Jungle, Jameen*' which are essential for the tribal way of life. The rampant mining and other industrial operations caused a fear of displacement among the tribal communities in Jharkhand. Local activists played central role in empowering communities and asserting their rights, coordinating events and speeches that emphasize the historical context of Adivasi struggles and resistance.

The Pathalgadi movement employed discursive tactics of resistance that center on the creation and dissemination of narratives, categorized into three main themes: tribal identity, the adverse impacts of industrial development, and the threats posed by outsiders and government officials.²⁷ The narratives establish a compelling discourse that validates the necessity of the movement. The legal tactics in this movement included criticizing the rhetoric and commitments of those in power to hold them accountable for the violation of their forest rights. The Pathalgadi movement being rooted in the assertion of legal rights as provided under the Constitution of India, PESA, 1993 and FRA, 2006, emerged as a reaction towards governmental efforts in repealing CNT Act, 1908. Also, it emphasized on assertion of their rights as enshrined under FRA, 2006. The militant tactics of the movement included violent methods of confrontation. Simdega has been a significant location for Naxal insurgency operations conducted by Jharkhand.²⁸ The Pathalgadi movement influenced forest governance and livelihoods of local populations. Munda tribals opposed any intervention from forest department, especially regarding single-crop plantations. There were also threats

²⁶ Eva Davidsdottir, "Our rights are carved in stone: the case of the Pathalgadi movement in Simdega, Jharkhand," 25 *Routledge, Taylor and Francis Group* 1111–25 (2021).

²⁷ EPW Engage, "Jal, Jangal aur Jameen: the Pathalgadi Movement and Adivasi Rights" *Economic and Political Weekly (Engage)*.

²⁸ *Ibid.*

given to the forest authorities, but no violence was reported on the part of Munda tribals.

The Pathalgadi movement has often been characterized for its non-violent techniques and adhering to the law of the land. However, state produced narrative paints a different picture of this movement, characterizing the movement as ‘Anti-Constitutional’ and driven by separatist ideology.²⁹ Mining corporations encroach upon Khuntkatti territories, neglecting Munda tribal rights and established legal frameworks. Conflicts emerge from encroachments on agricultural land, as local governments tend to favour the encroachers. However, the ground realities reveal that Munda tribals are still suffering with the mass displacement in various areas of Jharkhand due to several ongoing developments as well as mining projects in the area. It has been reported in a number of studies that there have been forest land conflicts between tribals and the industrial corporations which were trying to set up their industries in districts like Khunti and Simdega.³⁰ This suggests misrepresentation of Pathalgadi movement by the government that undermines the legitimacy of this movement in asserting their rights over forest resources and land.

The movement, which began in 2018 within Munda tribal communities of Simdega district, underscored the discrepancies between legislative intent and actual conditions regarding forest rights recognition. The implementation of the Act exposed deficiencies in its procedural framework, especially regarding claim filing and verification processes. Tribal groups come across several difficulties while going through a complex bureaucratic process. It may be related to documentation, technical mapping, verification protocols, etc. The institutional challenges further exacerbate these issues because of inadequate capacity and resources as well as limited knowledge about tribal customs.

The absence of coordination among different implementing agencies resulted in administrative bottlenecks that notably hindered the acknowledgement of forest rights. The Simdega movement highlighted significant deficiencies in the FRA’s protective framework,

²⁹ Amarnath Tewary, “The Pathalgadi Rebellion” *The Hindu*, 2018.

³⁰ Eva Davidsdottir, “Our rights are carved in stone: the case of the Pathalgadi movement in Simdega, Jharkhand,” 25 *Routledge, Taylor and Francis Group* 1111–25 (2021).

particularly regarding the legal safeguards for traditional forest dwellers against displacement and the inadequate recognition of cultural and religious rights. The Pathalgadi Movement, through its sustained activism and community mobilization increased the awareness about forest rights among the tribal groups.³¹ It also led to the initiation of community-led documentation process in ascertaining their rights over forest resources and reinforced the involvement of Munda women in the tribal forest governance. The movement raised the issue of timely processing of the claims and transparency in the verification procedure. It also impacted the dispute resolution as well as integration of tribal traditional knowledge in forest administration and practices.

However, implementation of this law has proven ineffective, with only 17 percent of the entire estimated forest area.³² According to one study, Monthly Progress Report on FRA, collected by Ministry of Tribal Affairs (MoTA), showed that approximately 18,93,477 claims were recognized over 17,857,026.94 acres of forest land in 2018, comprising 46,73,117.58 acres for 'Individual Forest Rights (IFRs)' and 13,183,909.36 acres for 'Community Forest Rights (CFRs)' claims, throughout India.³³ The scale of FRA implementation varies significantly across India, both in terms of uniformity and pace.

The five leading states- Odisha, Chhattisgarh, Madhya Pradesh, Tripura, and Maharashtra—accounted for 71% of all recognized forest rights claims and 76% of total forest lands recognized in India in 2018.³⁴ FRA has prompted significant debate in India, as various stakeholders and the Ministry of Tribal Affairs (MoTA) contest the inclusion of non-tribals as OTFDs. As per this, OTFDs must establish that they resided on or were reliant on forest land before 2015, and must present 75 years of evidence to substantiate their tenure rights under the law. This provision is stringent and resulted into

³¹ Hilary Standing, "Munda Religion and Social Structure" (unpublished Doctoral Thesis, School of Oriental and African Studies, University of London, London, 2017).

³² Simrin Sirur, "More than 15 years on, implementation of Forest Right Act is lagging, new report finds" *Mongabay* (2024).

³³ Geetanjoy Sahu, Abhilash Toppo and Aindrila Ganguly, *Forest Rights Act Implementation In Jharkhand Promise And Performance* (Tata Institute of Social Sciences (TISS), 2018).

³⁴ *Ibid.*

considerable discrimination against other traditional forest dwellers (OTFDs) during the recognition process. According to a study, in Jharkhand, Gram Sabha affiliates in some districts said that OTFDs rights are often denied and lacks sufficient support for their claims at grassroots level of forest governance. For example, it indicated about 1256 IFR claims where no OTFD claim was presented at Gram Sabha level which reveals that there is a misperception at village level with regards to rights of OTFDs and proof required for recognition of their claims.

In districts where Gram Sabhas had authenticated claims of OTFDs, the state and district level members dismissed these claims due to insufficient proof.³⁵ Section 4 (6) of FRA permits forest dwellers to claim a maximum of 4 hectares of forest land for individual or shared use, either for inhabitation or agricultural purposes.³⁶ Nevertheless, MoTA explained that 4 hectare limit outlined in provision pertains exclusively to rights under Section 3 (1) (a) of the Act and does not extend to any other provision, including the alteration of lease, or conversion of forest villages into revenue villages, among others.³⁷

Average IFR recognized part in Jharkhand is 1.77 acres, which is lesser than national average of 2.56 acres and significantly less than that of other Indian states.³⁸ Average documented CFR range in Jharkhand is 47.74 acres, which is less than national average of 182.94 acres and suggestively lower than that of other Indian states.³⁹ This significant disparity between claimed and identified area under IFRs and CFRs is evident in Jharkhand. Surveys from various tribal villages in Jharkhand indicate that, regardless of social groups, approved IFR area is smaller

³⁵ Geetanjoy Sahu, "Implementation of the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Rights) Act 2006 in Jharkhand: Problems and Challenges," 9 *Journal of Land and Rural Studies* 158–77 (2021).

³⁶ Madhusudan Bandi, "Forest Rights Act: Towards the End of Struggle for Tribals?," 42(1/2) *Social Scientist* 63–81 (2014).

³⁷ Geetanjoy Sahu, "The Genesis, Process, and Implications of the Forest Rights Act, 2006," 10(2) *Review of Agrarian Studies, TISS, Mumbai* (2020).

³⁸ Geetanjoy Sahu, "Implementation of the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Rights) Act 2006 in Jharkhand: Problems and Challenges," 9 *Journal of Land and Rural Studies* 158–77 (2021).

³⁹ *Ibid.*

than claims made by forest dwellers. This holds true for CFR claims as well.

Therefore, in Jharkhand, Munda tribals claims to rights and resources have been partially legitimized through both national and state legal frameworks. Concurrently, there have been dilution of their rights. Tribal resistance manifests in many forms, including legal claims and outright fierce conflicts.

4. Conclusion

FRA is an important law, but its effective implementation did not occur. It is the need of hour that innovative approaches like institution of *Van Suraksha Samiti* (Forest Protection Committees) is facilitated under the said Act which may effectively enhance the functioning of this law. It is required that Gram Sabhas under the Act is adequately empowered to aid in its smooth functioning. Digitization of the forest record at village, sub-division and district levels is essential as GPS instruments are available which can accurately provide the measurements of the land.⁴⁰ This may greatly help in addressing the conflicting claims and rejection of Community Forest Rights (CFR) applications. Jharkhand government is needed to gather backing from technical institutions like 'National Remote Sensing Centre', 'Bhaskaracharya Institute for Space Applications', 'Geo-Informatics' etc. to develop training platforms and raise awareness about tribal rights and enhance capacity building. It is crucial for Ministry of Environment and Forest to collaborate with Ministry of Tribal Welfare for its impactful execution. It would be beneficial if state government promote cooperation among State Forest Department and State Tribal Welfare Department. Active involvement of state government and empowerment of Gram Sabha will facilitate in more streamlined decision-making. It is required that the technological machinery developed by the state government is utilized to resolve the land conflicts involving tribals and big corporations. It will enhance the accountability and transparency in the implementation of FRA, 2006. The collective administering over forest land resources by ensuring

⁴⁰ Kunal Purohit, "In Jharkhand, the digitisation of land records stripped many villagers of their farms overnight" *Scroll.in*, 2019 available at: <https://scroll.in/article/946981/in-jharkhand-the-digitisation-of-land-records-stripped-many-villagers-of-their-farms-overnight> (last visited April 22, 2024).

CFRs is crucial to protect Munda tribal rights from their exploitation by external entities.⁴¹

⁴¹ Vasundhara and Kalpavriksh, *A National Report on Community Forest Rights under Forest Rights Act: Status & Issues A National Report on Community Forest Rights under Forest Rights Act: Status & Issues* (Community Forest Rights Learning and Advocacy Process (CFR LA), 2008).