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Land Rights and Laws for Management and Protection of Forests in Manipur

Aribam Bidyarani Sharma

Ph.D. Student (UGC JRF), Department of Mass Communication, Manipur University, Canchipur, Manipur, India

Abstract:

Land rights and laws for management and protection of Forest in Manipur can be dealt with under three different heads: (a) Forest Rights and Forests Laws during the British Period (b) Forest Rights and Forest laws in Manipur after independence (c) Forest Rights and Forest laws after its inclusion in the concurrent list of the Constitution of India. During the British regime and after independence, the Indian Forest Act, 1927 was the main law of both Forest and wildlife. Some state regulations were also framed in accord with that Indian Forest Act 1927. In the later stage, M.L.R. & L.R. Act, 1960, Forest Rules 1971, Wildlife Protection Act 1972, and Forest Conservation Act were passed. Though M.L.R. & L.R. Act 1960 is a land act, it speaks of forests and wildlife. However, the laws were hardly implemented except levying taxes or custom taxes on the highways or the main road as the chiefs opposed the survey and land settlement of hilly areas. It is also a fact that the rights of the chiefs had already been acquisitioned by passing an act in 1967. There was a fear amongst the tribal chiefs and thus opposed the move as they thought that once the survey had been completed, the tax would be increased and it would give a foot hole for the land-seekers of the valley. The Govt. has all the powers to acquisition any land if it has a proprietary interest.

Now, with the inclusion of the subject matters of forest and wildlife in the Concurrent list of the Constitution of India, it has become a fundamental right to enjoy a good environment and fundamental duty of every citizen of the country to protect the environment, forest, wildlife etc. Manipur has no big industry. Forest and wildlife are good sectors for generating a good income to the state. The central laws and directives of the Supreme Court as regards forest, wildlife and environment are binding on all the states if there are no alternative state laws. Protection of the environment is a fundamental right challengeable in the court if anything done to the environment affects our personal liberty to enjoy it. Felling of trees, wild-full quarrying, killing of wildlife, mining that affect our enjoying a good environment are all illegal acts. It requires approval of the Central Government for the use of forest land exceeding 10 hectares of land for non-forest purpose. Hundreds and thousands of hectares of forest land are converted into agricultural land or wasteland each year because of jhum cultivation, forest-fire and encroachment. It should be checked urgently. Forest, wildlife and the natural environment are the common properties of all citizens.

Keywords: *Afforestation, Forests, Jhum Cultivation, Manipur, Meities*

1. Introduction

During the time of Rajas and Maharajas, prior to the British regime, all lands belonged to the king (the ruler) and land revenue was collected in kind. However, forests being the gifts of nature, there was no hard and fast rules as to its administration. It was considered as the common properties and common hunting grounds for both the major communities -the Meiteis and Tribals. And killing of wildlife was considered a game to try their hands, to show off their strength and for fulfillment of customary community obligations. There were often disputes between the Meitei king and tribal Chief as to whether a kill or a hunt should belong to him or not, or whether the hunt was killed by his arrow / spear or not, but hardly because the forest belonged to him or the forests falls within his territory. So, the deciding principle was rather a physical fight or might or surrender. Living in the valley area or in the hilly area was a matter of personal choice.

It does not mean that there had not been any armed conflicts between the two communities. Several battles were fought between the two communities. Consequently, the one who lost the battle had to pay tributes to the victorious. But it was not regular and systematic. It was during the British period only when systematic Forest Divisions were made and regular taxes were levied. So, while dealing with the implementation of forest and wildlife protection laws, it has to be dealt with under three different heads: (a) forest protection laws during the British period in Manipur; (b) forest protection laws of Manipur after Independence; and(c) Central forests protection laws after its inclusion in the concurrent list.

1.1. Forest Laws during the British Period in Manipur

There was no systematic forest management and administrative organization in the state of Manipur prior to the British Rule in Manipur (1891). Till the year 1931, the state had neither a separate Forest Department, nor Forest Policy, nor trained professional for the management and administration of ever expanding forest of the state. There were instances that some persons in the king's service were given rights to collect taxes from some particular hilly areas. They were known as HAO-LAMBU/ HAORUMBU in some local areas (which means: Hao=tribal people; lambus/rumbus=owner of the land/owner of tribal inhabited land) to help collection of land tax. It was the 'Phoonan Selungba' who was directly in charge of all matters relating to land and its taxes. It was in the year 1898, the forests of Manipur had been put nominally and in an ill-defined way under the contract of Assam Forest Department for their management and in a similar vague manner within the sphere of influence of DFO, Cachar Division under an agreement with Assam Government.

'During the early period of British Rule, no separate forest officer was appointed and forests affairs were looked after by the President, Manipur state Darbar (PMSD) during which collection from forest produces were introduced through toll stations and a few forests were reserved. It was only in the year 1931(1st November that a separate Forest Department was constituted under the charge of a separate forest member in the Darbar. Considerable improvement had taken place since then through a brief forest policy highlighted under Darbar Resolution No.10A, 1932 which envisaged four types of forest in the state, viz:

State Reserve	-To be put under strict state protection
Valley Forest Reserve	-For the villages situated in the valley, but depending on the nearby forests for meeting their requirements.
Hill Village Reserve	-Known as ¼ miles reserve maintained around each recognized hill village (pawa reserve).
Open Reserve	-Open for commercial and domestic requirements of people.

The first forest officer involved in the management of forest of the state was Mr. D. C. Kaith, an officer from Himachal Pradesh taken on deputation in the year 1932. He was given the first assignment to write about Manipur forests specially of Jiri –Barrak drainage forests which at present Western Forest Division, Jiribam Forest Division, Southern Forest Division and a portion of Tengnoupal Forest Division. He divided these areas into nineteen timber blocks for proper management and extraction. Mr. Kaith's report was very comprehensive and was taken as the foundation of Forestry in Manipur.

Shri Hari Singh, a product of Edinburgh, succeeded him and stayed in Manipur for over a year. Shri Reddy replaced him and worked up to 1942. During this period, Shri L.I. Singh was the Durbar Member in charge of Forest and it was during this period that Indian Forests Act 1927 was adopted in Manipur with a few modifications'. (ANNUAL ADMINISTRATIVE REPORT 2010-11, p.2-3). So, Indian Forest Act, 1927 was the principal/guiding law for the administration, management and protection of forest and wildlife in Manipur at the relevant time. During 1939-41, a Ranger was trained in Forestry Course for the first time. At that time, the entire state was a Forest Division.

As of right on Reserve Forest land, It is pointed out, "After the issue of a notification under section 4, no right shall be acquired in or over the land comprised in such notification, except by succession or under a grant or contract in writing made or entered into by or on behalf of the Government or some person in whom such rights was vested when the notification was issued; and no fresh clearings for cultivation or for any other purposes shall be made in such land except in accordance with such rules as may be made by the state Government in this behalf." Section 9 declares, "Rights in respect of which no claim has been preferred under section 6 and of the existence of which no knowledge has been acquired by inquiry under section 7, shall be extinguished, unless before the notification is published". Even when a claim had been made the forest officer had the right to admit or reject it. (Section 4,6,7 and 9 of Indian Forest Act-1927)

1.2. Forest Laws of Manipur after Independence

Even after independence, the Indian Forest Act 1927 remained in vogue in Manipur with certain additions or omissions from time to time. However, it is a matter of record that there had been substantial changes in the nature of the customary authority and the extent of control as exercised by the village councils and chiefs, after independence. The enactment of Manipur Land Revenue Act, 1960 authorized the government to carry out survey and settlement operations in the hilly regions. Complementary to this act was the Manipur Hill Areas (Acquisition of chiefs' rights) Act 1967 under which the government would acquire all rights over land and the chiefs would be given compensation in return. Their rights to collect tax from the cultivator were also abolished. However, it remained a decision/law on paper only as the Chief system still continued. The formal claim of the Forest Department over all forest lands led to a continued conflict between the state and the Naga and Kuki chiefs. But these chiefs used the uncertainty caused by the conflict to assert their rights over all tree resources especially in cases where they gained monetary benefits (State of Forests in Manipur, p.68).

As such, the exploitation of forest resources combined with the demand of industry and other household requirements facilitated the nexus between the chiefs and contractors.' Then, the people of the hill led by their chiefs, opposed to the survey and settlement operations because they felt that once these operations were completed they would have to pay higher taxes. It might also give a foothold to land seekers from the valley. Further, the tribal elite feared that with the enforcement of land ceiling laws they would be deprived of their surplus land and their power would be undermined. As is rightly observed in a study on the Kukis by T.S.Gangte, the profit of forestry in the post- independence period seldom went to the ordinary tribals. The major portions of the revenue went to the contractor who had an understanding of the market and trade. The trader-chief nexus (where it exists) can only be broken with the settlement of land rights in the hill district (State of Forest in Manipur, Chapter –V, p.68).

As of 'right to all tree, jungles or other natural products growing on land set apart for forest reserves and to all trees, brush –wood, jungle, other natural product, wherever growing except in so far as the same be the property of any person, vest in Government, and such trees, brush- wood, jungle or other natural product shall be preserved or disposed of in such a manner as may be prescribed keeping in view of the interest of the people in the area with regard to the use of the natural products'.(Section 12 of M.L.R. And L.R. Act 1960). And after the amendment of Section 2 of the M. L.R. & L.R. Act in 1976 to the effect that "the state Government may by notification in the official gazette extend the whole or any part or any section of this act to any of the hill areas of Manipur also as may be specified in such notification". The state Govt. has the power to acquisition any land in the valley or in the hilly areas in the public interest (adopting the procedures as given in section 4, 5,5A,6 and 7 of the Land Acquisition Act of 1894).

About the enforcement of the M.L.R. Act And L. R. Act, it is laid down under sub-section (3) of section 1 that the Act shall come into force on such date as the state Government may, by notification in the official Gazette appoint and it is in the discretion of the state Govt. to enforce different provisions at different places. Thus, there were 1478 villages in the hill areas (including 24 villages of the Jiribam Sub-Division) satisfying the definition of 'hill areas' (A Study of the Land System of Manipur,1985, p.76). However, the provisions under Chapter I to VIII, XII, XIII and some sections of Chapter X were enforced for the first time in the sub-Division of Thoubal, Bishenpur, Imphal West, Imphal East with effect from 1/6/1961; in 92 villages of Churachandpur from 1/3/1962; in Makhao Tampak, Churachandpur from 26/11/1964; and 14 villages of Sadar Hills Circle, Mao Sub-Division from 26/2/65.

The government failed to introduce the MLR and LR act in the whole of hill areas, nor could enact a consensus law meant only for the hill areas. The North-East stands unique in having different land tenure systems compared to the rest of India. In Manipur, the land tenure system of the Kukis varied from that of the Nagas. The Kuki chiefs had the overall authority over the land in their jurisdiction; the Nagas had their individual share of land for disposal for which the consent of the chief was not mandatory. The chiefs of the Kukis are hierarchical and the chiefs of the Nagas are village headman, mostly elected. So, in the case of the forest also, in Kuki areas, the forest land belongs to the chief of that area. In other case, a forest may belong to the chief or a community or an individual. So, bringing the land tenure system on a common platform was rather difficult while the government failed to introduce a common law. As such, the income from forest and forest produce mostly did not go to the state exchequer but in the pockets of contractors, communities or the chiefs, and the valley people have hardly any access.

It is only after 1971 that Manipur had its own forest rules called 'The Manipur Forest Rules 1971, which came into force from the 10th September, 1971. It has given detailed rules for the protection of forests and also of wildlife. While chapter 1 deals with the meanings of different terminology used in the said Rules, chapter 2 deals with the rules for the protection of forests from getting afire and its probable causes and its penalties (Rule 12 to 19).In chapter V, it has given the names of 49 (rare, economic, fruit bearing and good quality) trees to be reserved in protected forest areas. Some of them are: Albizzia procera (khal),Amoor rohituka (Heirangoi), Anthocephalus cadamba (Kali Kodam) Artocarpus intergrifolia (Theibong), Bischulfia javanica (Uthum Naraoibi), Bambusa malabaricum (Tera), Gmelina arborea (wang), Mangifera Indica (Heinou). Pinus Khasia (Uchan), Michlia spp (Leihao), Tectona grandis(Chingshu),etc.(Manipur Forest Rules 1971, Chapter-V)

The Rules prohibits looping of branches of trees, wounding of trees for extraction of gum, uprooting or felling of trees, removal of forest produces etc. However, there is relaxation for the forest villagers or license holders as regards- grazing of cattle, right of collection of firewood, hunting right and cultivation rights. Rule 31 speaks of preventions of cutting, sawing, conversion and removal of trees and timber and the collection, manufacture and removal of forest produce and cutting of grass and pasturing of cattle shall be regulated so far as may in accordance with the provisions of working plans/working sentence duly schemes duly approved by the Government, in so far they are not inconsistent with this rules.

The Forest Department has the right to manage only the reserved forest area of 1,467 km² (8.42% of the total forest area) (State of Forest Report, 2009, FSI) directly and to take care of the protected forests. There has been a major portion of the unclassified forest area of 11,780 km² (67.63%)(State of Forest Report, 2009, FSI) not controlled by the department where traditional shifting cultivation is widespread and where excessive exploitation of forest land, hunting, quarrying and deforestation are done. Practically there has been no control over the massive destruction of the forests. Legally, the unclassified forest belongs to the state whereas the *de-facto* control lies in the hand of the local chiefs.

Manipur has no sufficient legislation to protect the forests and wildlife like that of Assam or other neighbouring states except the Manipur Forest Rules 1971 and Wildlife Protection Act 1972 which had been formulated to implement the provisions of Indian Forest Act 1927 in the state. All the policies and the rules of the Forest Department of Manipur are guided by the Indian Forest Act, 1927 and the Forest Conservation Act 1980, which are in force in the rest of the country. However, there had been a provision in the MLR and LR Act (1960) which did make some mention of forest land and rights thereof, not to be in the private hands. It states that the right to all the trees, jungles, natural produce on such land shall be vested with government.

With the election of Autonomous District Councils in 2015 in the hilly districts of Manipur, there had been a recommendation for the shift in the management and administration of forests. It had been recommended that the management of the forest be done by Autonomous District Councils. It requires reconsideration in the light of the Sarkaria Commission. And there should be a clear cut demarcation in the control and administration of the forests between the state and tribal communities as it is one of the major income generating sectors of the state of the commercial/industrial products.

1.3. Central Forest Protection Laws after Its Inclusion in the Concurrent List

Before independence, even in Manipur, Forest Departments of individual states continued to regulate forests in accord with the Indian Forest Act of 1927, as implemented by state regulations. The said Indian Forest Act, gives the states jurisdiction over both public and private forests and facilitate the extraction of timber for profit. Public forests are those in which state governments have a proprietary

interest. Village forests are established when a state assigns to village community the right over any forest in the vicinity of that village under certain conditions and rules to protect and develop the forest at the same time to allow them to collect fuel-wood and timber. The state Government having its proprietary interest may declare any forest or wasteland as Protected Forests by giving notification in the Gazette and after satisfying claims and counter-claims with due legal process. By so doing the Govt. can impose restrictions in the entry into the area, collection of firewood, quarrying, agricultural works etc. even before the completion of legal process of acquiring it. However, protected forest cannot be created out of a reserve forest.

As told earlier, forest land or wasteland may be notified as a reserve forest by a state government's declaration in the official gazette. By so doing, previously recognized individual and community rights over the forest were extinguished upon such a notification and access to the forest and forest produce became a matter of permission by the state authority or forest Department acting under governing laws and regulations. The act includes procedures for making claims against the government for the loss of legal rights over the forests.

'Till 1976, forestry as a subject was in List II (state list) of the Seventh Schedule of the Constitution of India. Hence state Governments were responsible for the conservation and development of forests. Being a state subject, the Government of India had no statutory powers to intervene. In 1976, the central Government first issued guidelines to all the states to consult Government of India before diverting more than 10 hectares of forest land to non-forest use. However, the guidelines being non-statutory in nature were mostly ignored by the states and diversion of forest land continued at almost the same rate as before. Recognizing the gravity of the situation, Government of India brought about constitution (Forty second Amendment) Act, 1976 and the subject of Forest and Wildlife were brought under List III (concurrent List) of the Seventh Schedule of the Constitution of India. Since then, the Central Govt. generally sets the broad national policy and legal framework, and supporting statutes. These, at the national level, act as a guiding framework for the states.' (GANESHMURTHY 2011, p.15)

Following the above mentioned constitutional amendment, The Forest Conservation Act, 1980, Scheduled Tribes and other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006, The public Liability Insurance Act 1991, etc. were passed. The Wildlife Protection Act 1972 had already been enacted. It was intended to forbid indiscriminate diversion of forest lands into agricultural, housing, industry, mining-zones etc. In October 1992, guidelines were issued detailing the terms and conditions subject to which diversion could be allowed. One of the essential conditions was that the user agency would adequately compensate for forest loss by raising compensatory afforestation at non-forested land of equivalent area.

In addition, the Supreme Court of India has also adjudicated cases concerning forest and environment under Article 14 (equality before the law), and Article 21 (protection of life and personal liberty). The Constitution of India, one of the longest and the most exhaustive Constitution of any independent nation in the world, has given recognition for protection and preservation of forest and wildlife. As part of the natural environment and life support system, forests have engaged the attention of all sections of society. Part IV of the Constitution of India contains Directive Principles of State Policy. Article 48(A) of the Constitution falling under Part IV reads; "Protection and improvement of environment and safeguarding of forest and wildlife: The state shall endeavor to protect and improve the environment and to safeguard the forest and wildlife of the country."

Furthermore, forests and protection of wild animals and birds are subjects listed in entries 17A and 17B respectively of list III (concurrent list) of the Seventh Schedule of the Constitution of India. Hence these subjects are of common interest to both the Central and State Governments. Without protection of forests, wildlife cannot be protected. Protection of either of them will mean the protection of the other. There are several parks and sanctuaries protected for the protection of wildlife.

'Encouraged by an atmosphere of Freedom and articulation in the aftermath of the Emergency, the Supreme Court entered one of the most creative periods. Specifically the Court fortified and expanded the Fundamental Right enshrined in Part III of the Constitution. In the process, the boundaries of the fundamental Right to Life and Personal Liberty guaranteed in Article 21 were expanded to include environmental protection. The Supreme Court strengthened Article 21 in two ways. First, it requires laws affecting personal liberty to pass the tests of Article 14 and Article 19 of the constitution, thereby ensuring that the procedure depriving a person of his or her personal liberty be reasonable, fair and just. Second, the court recognized several unarticulated liberties that were implied by Article 21. It is by this second method that the Supreme Court interpreted the right to life and personal liberty to include the right to a wholesome environment'. (Shyam and Rosencranz 2001, p.49). It thus forms the basis for further litigation, some of which are as follows:

(a) In DEHRADUN QUARRYING CASE, AIR-1988, SC-2187, the Supreme Court revealed the basis of its jurisdiction to entertain environmental cases. In SUBHASH KUMAR Vrs. STATE OF BIHAR, AIR-1991, SC-420, 'the Supreme Court held that the right to life includes the right to enjoy unpolluted air and water'. It does help in the restriction of wild quarrying, mining, deforestation or even in town planning if anything endangers or impairs the quality of life.

(b) In the case of T.N.GODAVARMAN THIRUMULKAPAD V UNION OF INDIA, AIR-1998, SC-769, the court observed, "To ensure protection of the Forest wealth, the forest officer in the north eastern states may be empowered with authority to investigate, prosecute and confiscate on the lines of the powers conferred on the forest officers in many other states in the country".

(c) As regards protection of Wildlife, in STATE OF BIHAR V MURAD ALKI KHAN as quoted, in AIR -1989 SC-1, the Apex Court observed, "The policy and objects of the wild life laws have a long history and are the result of increasing awareness of the compelling need to restore the serious ecological imbalances introduced by the degradation inflicted on nature by men. The state to which the ecological imbalances and the consequent environmental damages have reached is so alarming that unless immediate, determined and effective steps were taken, the damage might become irreversible. The preservation of the fauna and flora, some species of which are getting extinct at an alarming rate, has been a great and urgent necessity for the survival of humanity."

(d) In ANIMAL AND ENVIRONMENT LEGAL DEFENCE FUND Vs UNION OF INDIA, AIR-1997, SC-1071, the Apex Court observed, "Under S. 26(I)(i) of the Indian Forest Act, 1927, any person who in contravention of any rules made in this behalf by the state government hunts, shoots, fishes, poisons water or sets traps or snares shall be punishable in the manner provided in that section. According to the petitioner, in view of these provisions, the ancestors of the present tribal could not have acquired any fishing right in the Pench River. The present permits which are issued in lieu of the traditional right, therefore, are unwarranted and must be cancelled or set aside".

2. Conclusion

Manipur is a hilly state. 90% of the total land area constitutes the hilly areas and only 10% of the state is the valley area. About 65% of the total state populace living in the 10% valley area, has no access to the 90% hilly areas as a matter of legal right to settle there where almost all the forests are located. People generally are not much concerned about things where he has no right. What the valley people have to be concerned about environment is limited to the 10% valley area. Mostly the hilly people are born and brought up in the naturally grown forests. So, they believe in the natural growth of the forest. They are not much concerned about afforestation except horticultural activity. Once, the hilly people were dependent on the forest only to meet their daily needs for survival. But today, maximum exploitation is done to the forest which is a common property, with a view to private commercial or industrial interest with less afforestation efforts.

When the state plan expenditure on forestry, soil conservation and rubber plantation plus non-plan expenditure amounts to approximately Rs.7884, (rupees seven thousand eight hundred and eighty four approximately), the total income (revenue) was Rs.1,98,35,572 (rupees one crore ninety eight lakh thirty five thousand five hundred seventy two only), for the year 2010-11. The income from some of the major products as timber, firewood, cane, bamboo, sand and stone amounts to a total of Rs.1,83,85,306 (Annual Administrative Report, 2010-11, Chapter VII and Annexure-8). Forest is one of the productive assets of Manipur. It should not be allowed to be used as private property of a few people at the cost of others.

The income from Misc. items such as Wildlife Offence Fee, Moreh Rest House Fee, Forfeited Security Fee, Zoological Garden Entry Fee and others amounts to: Rs.8,20,856 (rupees eight lakh twenty thousand eight hundred and fifty six). These are the income from the major items out of the total income of Rs.1,98,35,572.00. (Annual Administrative Report, 2010-11, Chapter VII and Annexure-8). So, forest and wildlife are some of the biggest income generating sectors of Manipur, even though the state does not own any big industry. It is a sector to which greater attention should be paid.

Enactment of new laws only will not do much to the protection of forests and wildlife if people in and around the forests are not co-operative and do not lend a helping hand. If forest is there, wildlife is also there. And if forest is protected, wildlife is automatically protected. For this, mass education is the need of the hour. It requires mass awakening on the importance of forest and wildlife for the very existence and survival of the human race itself. For any project, Government or Private, the Environment Impact Assessment report should be tabled before the public so that they might take part and give suggestions in dealing with development and any evil consequences. Population growth, rapid urbanization and industrialization and their impacts are some of the major threats to the environment to be tackled with. Another threat is the encroachment into the forest land and continuing hunting, poaching and felling of trees. It can be checked if people in and around the forests are co-operative and are acquainted with the importance of forests and wildlife.

As part of a mass movement for protection of forest, wildlife and environment, initiatives like making environmental films and documentaries need to be taken up on state funding. Leaving areas to meet the daily requirements of the tribals and their communities for their survival, the remaining areas, if declared reserved or protected, in the public interest, it will lead the valley people to feel better for the protection of forest and wildlife. The encroachment into the forest land should immediately be stopped, and those who had already settled in the reserve forests should be deported in an area as decided or reserved by the Govt. If the whole population of the state grow or plant a tree each, twice a year, there will be a growth of more than 50 lakhs trees in a year, no special occasion or day will be required for afforestation programme. As a matter of record, there are a total of 1845 encroachers approximately as on 31/3/2008 (Annual Administrative Report, 2010-11, Annexure-5). They should be deported urgently or be treated as per provision of law.

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