



KUKI INPI MANIPUR

(Apex body of the Kuki Tribes)

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MEMORANDUM

To:

**Her Excellency,
Smt. Droupadi Murmu Ji,
Hon'ble President of India,
Rashtrapati Bhavan, New Delhi – 110004**

Subject: Urgent Appeal to Expedite Creation of Kukiland Union Territory with Legislature

Dear Madam,

We, the Kuki Inpi Manipur, on behalf of the collaboration of all the Villages Chief/Landlord in Hill Areas of Manipur, write with utmost urgency to bring to your kind attention the grave and ongoing humanitarian crisis faced by the **Adivasi Kuki community in Manipur**. The situation has deteriorated significantly since the outbreak of violence on **3rd May 2023**, resulting in massive loss of lives, widespread displacement, destruction of property, and systemic injustice against the minority Kuki population.

Background of the Crisis:

Since 3rd May 2023, Adivasi Kuki colonies in Imphal and villages in the Hill Districts have been targeted by radical groups such as Arambai Tenggol, Meitei Leepun, and other VBIGs, supported by radicalized police commandos, Meira Paibis, and CSOs like COCOMI, Kangleipak Kanba Lup, Federation of Haomee, WMC, Indigenous People Forum Manipur, FNCC and many other Meitei CSOs. These well-orchestrated attacks, allegedly supported by the state apparatus, have led to widespread massacres, rapes, arson, and displacement. Misinformation campaigns by certain media outlets have further vilified the Kuki community, distorting their historical presence and indigeneity in Manipur. Local and National Media outlets reportedly spread false information against the Adivasi Kuki Community, exacerbating the situation. The well pre-planned genocide Violence has led to significant displacement, destruction of properties and loss of life.

Key Concerns, Constitutional Violations and demands:

1. Urgent Appeal for Rescinding Unlawful Reserved Forest Declarations in the Scheduled Hill Areas of Manipur – Legal and Constitutional Violations (1927–2022):

These forest declarations, carried out between 1927 and 2022, violate:

- The Indian Forest Act, 1927 (Chapter II);
- The Forest Rights Act, 2006;
- Article 13 and 371C of the Constitution;
- The Manipur (Hill Areas) District Councils Act, 1971.

In numerous cases, tribal ancestral lands recognised villages have been converted into Reserved Forests **without notification, settlement of rights, or public hearings**, directly infringing upon the rights of the Scheduled Tribes.

All Reserved Forests declared in Manipur's Hill Areas under **Darbar Resolutions, Council Resolutions, or Standing Orders** before 1966 stand **legally repealed** under **Section 8(1)** of the **Manipur Hill Areas (House Tax) Act, 1966 (Manipur Act 9 of 1966)**, which states:

“All existing laws, including Council or Darbar Resolutions and Standing Orders relating to matters for which provision has been made in this Act are hereby repealed.”

Accordingly, forest reserves constituted without public notice, inquiry, or settlement of tribal rights have no legal force and are **null and void**. These include, among others:

- Khamenlok-Gwaltabi (1946), Kangchup (1940), Sambei-Purum (1936), Langol (1938), Cheklaphai (1945), Vangai, Kaimai, Tolbung (1935), Kangbung, Longja, Yangenching (1939), and Jirimukh (1940).

Despite this, the **State Government and Forest Department under Chief Minister N. Biren Singh** have attempted to revive these **extinct forest reserves**, violating:

- The Constitution (Art. 13, 300A, 371C),
- Forest Rights Act, 2006,
- Repealing provisions of the 1966 Act (Section 8(1) of the Manipur Hill Areas (House Tax) Act, 1966 (Manipur Act 9 of 1966),

Such actions represent a **coordinated attempt to dispossess Kuki tribal communities** of their ancestral lands, and propagate a **state-backed narrative of encroachment** by manipulating defunct forest laws. This campaign, amplified by radical Meitei groups, severely undermines communal peace and constitutional order.

We therefore reiterate our demand for:

- **Immediate and total rescission** of all such forest declarations;
- **Recognition of the 1966 repeal** as binding constitutional law;
- **Restoration of tribal land rights** and protection from state overreach.
- **Suspend or rescind forest declarations** made in contravention of law;
- Uphold tribal customary land rights and local governance authority as enshrined in the Constitution.

2. Appeal to Revoke Illegally Constituted Protected Forests in the Hill Areas of Manipur (1951–1967):

Between 1951 and 1967, large tracts of ancestral tribal lands were **illegally notified as Protected Forests** under **Chapter IV of the Indian Forest Act, 1927**, without any lawful inquiry or consent-based process.

These actions:

- **Bypassed statutory settlement proceedings** under Sections 29–34 of the Act;

- **Violated tribal land rights** under Section 158 of the Manipur Land Revenue and Land Reforms Act, 1960;
- Were executed without oversight by the Hill Areas Committee, violating Article 371C.

Based on the above legal and documentary review, the following forest zones--constituted between 1951 and 1967—were **illegitimately notified** and must be considered **invalid**:

1. **Tairenpokpi-Tamenglong Protected Forest**
(Sadar Hills Autonomous District / Kangpokpi District)
2. **Shikhong-Ningel Protected Forest**
(Sadar Hills Autonomous District / Kangpokpi District)
3. **Churachandpur-Khoupum Protected Forest**
(Churachandpur District)

Given the **flagrant disregard for constitutional, legal, and customary rights**, the **Central Government** must urgently direct the **State Government of Manipur** to:

- **Invalidate all illegal declarations** of Reserved Forests, Protected Forests, and Wildlife Sanctuaries in the Hill Areas;
- **Rescind ongoing enforcement actions** and **halt further intrusions** into tribal territories.

Failure to do so will not only erode the trust of indigenous communities in democratic institutions but also deepen ethnic polarization in a region already scarred by systemic marginalization and conflict.

3. **Urgent Request to Invalidate Illegally Constituted Reserved Forests and Wildlife Sanctuaries in Manipur's Hill Areas (1951–1967):**

A number of Reserved Forests and Wildlife Sanctuaries in tribal territories were **constituted unilaterally by the State** between 1951 and 1967. This was done without following:

- Chapter II of the Indian Forest Act (Sections 3–20);
- Tribal consent as required under customary practices;
- Consultation with ADCs and the Hill Areas Committee.

These territories are **not state land**, but community-owned ancestral lands.

Based on the above legal and documentary review, the following forest zones—constituted between 1951 and 1967—were **illegitimately notified** within the recognised Hill villages and must be considered **invalid**:

1. **Kanglatongbi-Kangpokpi Reserved Forest**
(Sadar Hills Autonomous District / Kangpokpi District)
2. **Nongmaiching Reserved Forest**
(Sadar Hills Autonomous District / Kangpokpi District)
3. **Dampi Reserved Forest**(Churachandpur District)
4. **Sambei-Purum Reserved Forest**(Kangpokpi District)
5. **Kaihlam Wildlife Sanctuary**(Churachandpur District)

We urge:

- An immediate **review and de-notification** of such sanctuaries and forests;
- Application of **PESA-like principles** in recognizing tribal jurisdiction over natural resources.

4. Urgent Appeal for Central Intervention to Rectify Systematic Manipulation of Land Records in the recognised villages in Hill Areas of Manipur (1960–2022):

From 1960 onwards, tribal lands in the Hill Areas of Manipur were progressively **recorded as government land, forest land, or blank entries**, despite longstanding customary occupation by tribal communities.

A detailed review of land records reveals:

- Hill village land documents were registered in Sub-Registrar offices of valley districts.
- These registrations violate Section 28 of the Registration Act, 1908, Section 2 and section 158 of the MLR & LR Act, 1960.
- Such manipulation has led to the overlapping of jurisdiction between hill and valley districts.

This administrative overreach undermines the constitutional safeguards for tribal lands and the integrity of official land records.

Illegality of MLR & LR Act Extension to Recognised villages in Hill Areas:

- The 1965 extension to Moreh and subsequent amendments in 1975 were unconstitutional.
- Executive notifications from 1985–2010, issued during non-functional periods of ADCs, lacked legal validity.
- Land transfers during this time are void.

In 1975, the MLR & LR Act was amended—**without the approval of the Hill Areas Committee (HAC)**—allowing selective extension of the Act to hill areas by executive notification. This led to:

- Extension to Moreh (1965) and other hill areas
- A failed attempt in 1989 to extend the entire Act due to lack of HAC approval
- The 2015 introduction of three controversial Bills, later rejected by the President after tribal protests

Despite several government directives:

- 2013 orders by Commissioner (Revenue), Manipur (Ref. No. 3/1/Misc./2005-Com (Rev) Pt.)
- 2011 letter from DC Chandel requesting transfer of records from Thoubal

Land records in hill areas still remain in valley district offices, in violation of these directives. Repeated representations by tribal leaders to the Manipur Administrator and the Hill Areas Committee have gone unheeded. The Government Order dated 24th April 2013 (No. 3/1/Misc/2008-Comp (Rev) Pt) on transferring land records remains unimplemented.

Letter No. DRO-101/14/2022-REV-REVENUE (dated 24th Oct 2022) confirms:

- 88 villages overlapping between Kangpokpi & Imphal East

- 152 between Kangpokpi & Imphal West
- 19 between Kangpokpi & Thoubal
- 9 between Kangpokpi & Bishnupur
- 119 between Churachandpur & Bishnupur
- Others between Chandel, Tengnoupal & Kakching

The Office Memorandum No. 16/2/MISC/2008-Com (Rev), dated 26th August 2008, and subsequent Order No. 14/1/2008-CON, dated 8th June 2009, which **illegally transferred powers** from the Hill Commissioner, Hill Areas Committee (HAC), and Tribal Affairs Department to the Revenue Department concerning village creation and recognition. This bypasses **Scheduled Matters** under the **HAC Order, 1972** and violates **Article 371C** of the Constitution.

The Revenue Department unconstitutionally assumed control of scheduled matters originally vested with the HAC under Article 371-C, including:

- Village recognition
- District/sub-division creation
- Acquisition of tribal land

Seven out of thirteen scheduled matters under the HAC have been transferred to the Revenue Department, violating constitutional protections.

Due to these manipulations, several villages now appear under dual jurisdiction—administratively as hill villages but revenue-wise under valley districts. This is unconstitutional and in direct violation of:

- **Section 28 of the Registration Act, 1908**
- **Section 2 and 158 of the MLR & LR Act, 1960**
- **Scheduled matters under the HAC Order, 1972**

This manipulation:

- Contravenes tribal protections under the Constitution;
- Violates the Forest Rights Act, 2006;
- Ignores the authority of the ADCs over land and resource management.

The Central Government must intervene to restore jurisdictional boundaries and correct the records accordingly:-

(i) Withdraw Unlawful Transfer of Powers:

We urge the rescinding of Office Memorandum No. 16/2/MISC/2008-Com (Rev), dated 26th August 2008, and subsequent Order No. 14/1/2008-CON, dated 8th June 2009, which **illegally transferred powers** from the Hill Commissioner, Hill Areas Committee (HAC), and Tribal Affairs Department to the Revenue Department concerning village creation and recognition. This bypasses **Scheduled Matters** under the **HAC Order, 1972** and violates **Article 371C** of the Constitution.

(ii) Rescind Illegal Land Allotments in Hill Areas:

We call for the **cancellation of all land allotments** (Jamabandi/Patta) within legally recognised Hill Villages in Hill Districts that have been processed or registered in the Sub-Registrar Offices of Valley Districts. These actions constitute violations of:

- **Section 28** of the Registration Act, 1908;
- **Sections 2 and 158(a)(b)** of the Manipur Land Revenue and Land Reforms Act, 1960;
- **Manipur Hill Areas (House Tax) Act, 1966;**
- **Article 371C** and related Scheduled Matters of the Hill Areas Committee.

(iii) Prevent Encroachment of Tribal Villages Land in Hill Areas by Non-Scheduled Tribes:

We seek urgent enforcement of land protections against **encroachments by non-STs**, especially Meitei individuals or organisations, into Adivasi Kuki village lands in the Hill Areas. These encroachments contravene:

- **Section 2 and Section 158 of the MLR & LR Act, 1960;**
- **Section 28 of the Registration Act, 1908;**
- **Scheduled Matters under the HAC Order, 1972.**

(iv) Revoke Unlawful Constitution of Panchayat Bodies in Hill Areas:

We urge the immediate **withdrawal of Panchayat institutions** illegally established within the jurisdictions of the Hill Areas Autonomous District Councils. This parallel system of governance undermines tribal autonomy and the statutory framework of the **Manipur (Hill Areas) District Councils Act, 1971**.

We request:

- Central appointment of a **Special Land Record Commission;**
- Freezing of forest/revenue entries post-1960 pending verification;
- Full restoration of customary ownership and village land maps.

5. Urgent Appeal for Central Action against Encroachment by Non-Scheduled Tribes in the Legally Demarcated Hill Areas of Manipur:

There is increasing encroachment by **non-tribal individuals and organizations** into tribal land in the Hill Areas, facilitated by unlawful land allotments and unauthorised settlements.

These encroachments:

- Undermine the land security of tribal communities;
- Contravene Section 2 and Section 158 of the Manipur Land Revenue and Land Reforms Act, 1960; Section 28 of the Registration Act, 1908; and jurisdiction of Manipur Hill Areas House Tax, Act, 1966 and ADC jurisdictions;
- Escalate ethnic tensions and insecurity.

We urge:

- Central directive to cancel illegal land allotments to non-STs;

- Strict enforcement of constitutional protections for ST areas.
 - All future registrations must comply with Section 28 and be registered in the sub-district where the land lies
 - Restore scheduled matters to the Hill Commissioner and Hill Areas Committee as per the Constitution and HAC Order, 1972.
 - **Review Unapproved Transfers:** For example, the Nongmaiching Reserve Forest notification (DRO-105/4/2022-REV-REVENUE, dated 5th Oct 2022) must be reviewed.
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6. Urgent Intervention Requested to Repeal the Illegitimate Extension of Valley District Police Jurisdictions into the Scheduled Hill Areas of Manipur:

Recent years have seen the illegal extension of **Valley-based police jurisdiction and stations** into Hill Areas, violating the spirit of **Article 371C** and the **ADC Act**.

The extension of police station jurisdictions of Manipur's Valley Districts into the Scheduled Hill Areas represents a systematic and unconstitutional encroachment upon the autonomous domains of the Hill Tribes, particularly the Kuki people. Under Article 166(3) of the Constitution of India, the allocation of executive functions to Ministers has been arbitrarily exploited by dominant Meitei Ministers of the State Government to facilitate this encroachment.

A pertinent example is the **Home Department Notification dated 14th June 2011**, issued in the name of the Governor by **Shri A.K. Sinha, Special Secretary (Home)**, which sanctioned the extension of various valley police stations into hill territories under the pretext of administrative convenience or response time.

The following are examples of Valley District Police Station jurisdictions unconstitutionally extended into the Hill Districts, all of which must be immediately withdrawn:

Imphal East to Kangpokpi District:

- Sagolmang, Yaingangpokpi & Maphou Dam PS → Saikul, Lhungtin, & Island Sub-Divisions
- Iril & Andro PS → Island Sub-Division

Imphal West to Kangpokpi District:

- Lamphel, Lamsang, Patsoi, Sekmai PS → Kangchup Geljang, Saikul Sub-Divisions

Thoubal District to Kangpokpi District:

- Nongpok Sekmai PS → Island Sub-Division, Kangpokpi District

Bishnupur to Churachandpur District:

- Moirang, Loktak PS → Henglep Sub-Division,
- Kumbi PS → Samulamlan Block,
- Phougakchao Ikhai PS → Kangvai Sub-Division,

Kakching to Chandel & Tengnoupal Districts:

- Sugnu PS → Chakpikarong Sub-Division,
- Pallel PS → Tengnoupal District

A letter dated **28th August 2022** from **Dr. Th. Charanjeet Singh**, Deputy Secretary (Home), requested the DGP to submit proposals for police jurisdiction reorganisation to align with revenue jurisdictions across all 16 districts by 29.08.2022. Yet, no concrete action has followed.

On **1st January 2024**, the Home Department issued an order (No.H-17/107/2023-HD-HD) in the name of the Governor to constitute a Committee to rationalise police jurisdictions along revenue boundaries. However, this initiative was undermined by a contradictory letter dated **11th September 2024** from **Shri L. Kailun, ADGP (L&O)**, refusing to reorganise Chandel District's police jurisdictions, citing vague concerns over "response time."

This refusal directly contradicts the 2022 directive and reveals a deliberate intent to maintain illegal Valley Police control in the Hill Areas. The "response time" excuse is a smokescreen to preserve control over tribal territories while facilitating Meitei militant intrusions.

These illegal extensions have significantly endangered the Kuki people in adjacent Hill Districts. On **3rd May 2023**, Meitei extremist groups—**Arambai Tenggol, Meitei Leepun, Meira Paibis**—with support from **state forces (Manipur Police Commando, IRB)**, carried out orchestrated ethnic violence:

- **228 Killed, 481 Injured**
- **4,1500 Internally Displaced Persons**
- **7,000+ Houses Burned or Destroyed in Hill Areas**
- **1838+ Houses burned or Destroyed in Imphal Areas**
- **350 Churches & Religious Sites Burnt**
- **4,000+ Students Displaced**

This campaign targeted **Kuki colonies in Imphal**, and soon extended to the Hill Districts—**Kangpokpi (120 villages), Tengnoupal (10 villages), Chandel (66 villages), Churachandpur (30 villages), and Jiribam Hill Areas (72 homes, schools, churches)**—all falling within the illegally extended jurisdiction of Valley Districts police stations.

This action:

- Breaches tribal autonomy and local governance;
- Lacks prior approval from the Hill Areas Committee;
- Infringes on customary law and community self-rule.

We seek:

- **Immediate withdrawal of such extensions;**
- Restoration of local jurisdiction through tribal law enforcement institutions.
- **Invalidate all Executive Orders** pertaining to police jurisdiction extension into Scheduled Hill Areas.
- **Rescind the 2011 Notification** issued by Special Secretary (Home), Shri A.K. Sinha, and all subsequent orders expanding Valley Police control.

- **Restore police jurisdiction to its lawful boundary**, co-terminus with the revenue jurisdictions under:
 - i. **Manipur Hill Areas District Council Act, 1971**
 - ii. **Manipur Hill People's Administration Regulation, 1947**
 - iii. **Manipur Land Revenue and Land Reforms Act, 1960**

7. Appeal for Institutional Safeguards, Constitutional Clarity, and Administrative Autonomy for the Hill Areas of Manipur:

To prevent further erosion of tribal rights, we call for:

- i. Strengthening of the **Autonomous District Councils** through constitutional amendment;
- ii. Clarification and implementation of Article 371C in spirit and form;
- iii. Consideration for bringing the Hill Areas under the **Sixth Schedule**
- iv. Consideration for bringing Hill areas viz. Kangpokpi District (Sadar Hills), Churachandpur District (Songpi), Tengnoupal District, Kamjong (Chassad) District, Pherzawl District, Noney Sub-Division (Noney District), Tousem Sub-Division (Tamenglong District), LM Block (Ukhrul District) and Hill Areas of Jiribam District as Kukiland **Union Territory with Legislature under Article 239A**.

8. Constitutional and Administrative Neglect of Manipur Hill Areas Autonomous District Councils (1972–2022) and Demand for Empowerment, Protection, and Structural Reform:

1. **Creation of Autonomous District Councils (ADCs):** The Manipur (Hill Areas) District Council Act, 1971, enacted under the Constitution (Twenty-Seventh Amendment) Act, 1971, enabled the creation of six ADCs on 14th February 1972 to provide autonomous governance to tribal hill areas.
2. **Statutory Framework – Section 3 of the Act:** The Act empowered the Administrator to divide hill areas into six autonomous districts, modify boundaries, and consult the Hill Areas Committee.
3. **Delineation of ADCs:** Official notification dated 14 February 1972 delineated six districts based on revenue jurisdictions. Recognised villages were listed in Manipur Gazettes dated 15 February 1972, 11 May 1974, and 12 November 1975.
4. **ADC Elections and Suspensions:** Councils were constituted on 1 August 1973. Over time, several ADCs were suspended and placed under district officials between 1988 and 1998.
5. **Demand for Devolution of Power:** The Hill Areas Committee opposed elections unless the Sixth Schedule was extended. The 2000s saw renewed MDC elections without addressing core autonomy issues.
6. **ADC Reversion & Controversies:** Despite tribal opposition, diluted provisions were reinstated. The 2009 Election Rules dropped the word “Autonomous,” symbolising diminished tribal governance.
7. **Powers & Limitations:** ADCs have jurisdiction over land, agriculture, forest (non-reserved), and tribal welfare, but lack financial and legislative authority under critical Articles of the Constitution.
8. **Conflict with Panchayati Raj Institutions:** Dual governance in hill areas undermines ADC authority. Zilla Parishad and Gram Panchayat overlaps need to be resolved.
9. **Recommendations:**
 - i. Establish a Union Territory with legislature for Kuki-dominated hill areas;
 - ii. Allocate separate budgets to each ADC;

- iii. Rescind the unauthorized establishment of Panchayat Local Bodies within the jurisdiction of the Hill Areas Autonomous District Councils, which undermines the constitutional and administrative structure specific to the Hill Areas.
- iv. Establish urban local bodies in Kuki inhabited tribal districts;
- v. Create autonomous zones in tribal-dominated regions;
- vi. Resolve dual jurisdiction in Kangpokpi and adjoining regions.

11. **Definition of Hill Areas:** As per the First Schedule of the Hill Areas Committee Order, 1972 and Manipur Gazette No. 209 (22 September 2009), the following areas are included:

- Senapati, Kangpokpi, Ukhrul, Kamjong, Tamenglong, Noney, Churachandpur, Pherzawl, Chandel, Tengnoupal.

The state must honour the territorial boundaries defined in these legal instruments.

9. Invocation of the Samatha Judgment for Protection of Tribal Land Rights in the Hill Areas of Manipur:

We reiterate the legal strength of the **Samatha Judgment (1997)** as a constitutional precedent for protecting tribal lands in Scheduled Areas and equivalent tribal territories like Manipur's Hill Areas.

All attempts to alienate land, impose forest laws, or extend state authority without ADC/HAC consent **violate the Samatha doctrine.**

The **Samatha Judgment** can be effectively **invoked to strengthen legal arguments** in the context of **Manipur's Hill Areas**, especially for protecting **tribal (particularly Kuki) land rights** and opposing **illegal jurisdictional extensions, land alienation, and state overreach:**

The **Samatha Judgment** clarified that **tribal lands — including government and forest lands — in Scheduled Areas cannot be transferred to non-tribals or private entities**, even for mining or industrial purposes.

◆ Application to Manipur:

- Manipur's **Hill Areas** (as per the **First Schedule of the Hill Areas Committee Order, 1972**) are constitutionally designated for **tribal self-governance**, akin in function to Scheduled Areas under the Fifth Schedule.
- The **Manipur (Hill Areas) District Councils Act, 1971**, gives similar autonomy to that envisioned under the Fifth Schedule.
- Therefore, **any attempt by the State Government or private companies to allocate land in these areas without ADC approval or contrary to tribal consent would be unconstitutional**, per Samatha.

Samatha emphasizes that **only tribal cooperatives or state instrumentalities** (not private parties) can undertake operations like mining in tribal areas — and **with the consent of tribal institutions.**

◆ Application to Manipur:

- The **Autonomous District Councils (ADCs)** and the **Hill Areas Committee (HAC)** are the legally empowered tribal governance structures in Manipur Hill Areas.

- The state government's bypassing of ADCs in land matters, police jurisdiction extensions, or forest clearances violates this principle.
- **Any state action without ADC/HAC consultation — especially involving land use — violates the constitutional spirit upheld in Samatha.**

The Supreme Court clearly held that **even state-owned land cannot be leased to non-tribals in Scheduled Areas**, as this would indirectly defeat the protective purpose of land transfer laws.

◆ **Application to Manipur:**

- Attempts by the Manipur Government to **reclassify or lease tribal land in the name of development, forest expansion, or police outposts** mirror the same violations the Samatha case opposed.
- **Extension of Valley Police Jurisdiction or Forest Department control into tribal lands** can be challenged using Samatha as violating tribal land protection principles.

Samatha reinforced that **tribal governance and self-determination are essential components** of India's constitutional framework, especially in Scheduled/tribal areas.

◆ **Application to Manipur:**

- The **erosion of ADC powers**, imposition of **Panchayati Raj institutions**, or **dual governance models (ADC + Zilla Parishad)** in Hill Areas can be challenged as undermining **constitutionally protected tribal self-rule. Revoke Unlawful Constitution of Panchayat Bodies:**
- **Restoration or enhancement of ADC powers**, or extension of **Sixth Schedule**, aligns with Samatha's constitutional reasoning.

10. Legal Submission — Constitutional Challenge to the Extension of State Jurisdiction into Manipur Hill Areas — Invocation of Samatha v. State of Andhra Pradesh (1997) 8 SCC 191:

This submission challenges the unconstitutional expansion of State Government jurisdiction, including revenue, police, and forest administration, into the Hill Areas of Manipur — particularly ancestral tribal territories inhabited by the Kuki people. These actions violate constitutional protections enshrined under:

- Article 371C of the Constitution of India;
- The Manipur (Hill Areas) District Councils Act, 1971;
- The Hill Areas Committee Order, 1972;
- The Manipur Land Revenue and Land Reforms Act, 1960 (particularly Section 158);
- The Forest Rights Act, 2006;
- The Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989.
- Manipur Hill Areas (House Tax) act, 1966

This violation is further reinforced by the binding precedent laid down in the landmark judgment of the Hon'ble Supreme Court in **Samatha v. State of Andhra Pradesh**, (1997) 8 SCC 191.

In *Samatha*, the Hon'ble Supreme Court ruled that **government land, forest land, and tribal lands in Scheduled Areas** cannot be leased or transferred to non-tribals or private entities, directly or indirectly, even for purported public or industrial purposes.

The core principles upheld in *Samatha* include:

- i. **Preservation of tribal land ownership and autonomy** over natural resources;
- ii. **Empowerment of local tribal institutions** (e.g., district councils) in governance and development;
- iii. **Restriction on state and private interference** in tribal areas without tribal consent;
- iv. Recognition that **constitutional protections for tribal areas take precedence over state economic interests**.

Although Manipur is not formally designated as a Fifth Schedule state, its **Hill Areas are governed under a parallel protective structure**, i.e.:

- a. **Autonomous District Councils** under the 1971 Act;
- b. **Hill Areas Committee** under Article 371C;
- c. Constitutional mandate to protect tribal land and governance autonomy.

The Supreme Court in *Samatha* emphasized that the **spirit of the Fifth Schedule must guide governance in all tribal regions**, irrespective of nomenclature. Accordingly, Manipur Hill Areas fall within the protective scope of the *Samatha* principles.

Therefore, **the extension of State control (police stations, revenue outposts, forest management, and settlement directives)** into the Hill Areas — without consent or consultation with ADCs and the HAC — is not only a violation of Article 371C but also contrary to the ratio decidendi in *Samatha*.

Reliefs Sought:

In light of the above, and consistent with the Supreme Court's ruling in *Samatha*, the following remedies are prayed for:

1. Declaration that any transfer, lease, or acquisition of tribal land in Manipur Hill Areas without the consent of the ADCs or HAC is unconstitutional and void ab initio;
2. Immediate halt to the extension of police jurisdiction, forest classification, and revenue settlements in the Hill Areas unless approved by the Hill Areas Committee;
3. Directive to the Government of India and Government of Manipur to uphold tribal autonomy as per Article 371C, and consider extension of the Sixth Schedule to the Hill Areas of Manipur;
4. Recognition that the Hill Areas of Manipur fall under the spirit of Fifth Schedule protections as per *Samatha*, and must be governed accordingly.
5. Recognition that the Hill Areas of Manipur viz. Kangpokpi District (Sadar Hills), Churachandpur District (Songpi), Pherzawl District, Tengnoupal District, Chandel District, Kamjong (Chassad) District, LM Block (Ukhrul District), Noney District, Tousem Sub-Division (Tamenglong District) and Hill Areas of Jiribam District as Kukiland Union Territory with Legislature under Article 239A (Puducherry Model).

11. Urgent Protection of Displaced Adivasi Kuki Properties in Imphal Areas and Hill Villages from Encroachment, as per Supreme Court Directive:

In light of recent conflict and displacement, we express deep concern regarding the protection of **Adivasi Kuki community properties**, both in the **Imphal areas** and **recognised Hill Villages**, from illegal occupation and encroachment. In accordance with constitutional safeguards and the

spirit of the Supreme Court's directive for protecting displaced persons, we submit the following urgent requests:

(i) Ensure Protection of Adivasi Kuki Properties:

We request strict directions to **protect displaced Kuki properties** from illegal occupation, both:

- In recognised Hill Villages within Hill Districts, and
- In urban and peri-urban Imphal areas where Kuki households have been targeted or vacated due to violence in strict compliance with the **directive orders of the Hon'ble Supreme Court (copy enclosed)**.
- Arrest all perpetrators involved in the **attacks, looting, vandalism, and illegal occupation** of homes and land belonging to Adivasi Kuki IDPs from both **Imphal Areas and Hill Villages**.

We respectfully urge your office to take immediate action to enforce land laws and constitutional safeguards, ensuring the **safe return, rehabilitation, and property rights** of displaced tribal communities.

12. Creation of Autonomous Regions:

We propose the **creation of dedicated Autonomous Regions** in Kuki-inhabited areas to ensure effective self-governance, protection of tribal rights, and equitable development. These regions should include:

1. Kamjong (Chassad)
2. LM Block (Ukhrul District)
3. Noney District
4. Tousem Sub-Division (Tamenglong District)
5. Pherzawl District
6. Chandel District
7. Hill Areas of Jiribam District

These areas have a significant Kuki population and require tailored administrative structures to address their specific socio-political, developmental, and security needs.

13. Coordination Between Proposed Autonomous Regions and Existing Autonomous District Councils (ADCs):

For efficient governance and policy implementation, we recommend the coordination of newly proposed Autonomous Regions with the existing ADCs as follows:

- (i) **Kamjong (Chassad) Autonomous Region** → to be coordinated with **Tengnoupal ADC**
- (ii) **Chandel Autonomous Region** → to be coordinated with **Tengnoupal ADC**
- (iii) **LM Block (Ukhrul District) Autonomous Region** → to be coordinated with **Sadar Hills ADC (Kangpokpi District)**
- (iv) **Noney Autonomous Region** → to be coordinated with **Sadar Hills ADC (Kangpokpi District)**
- (v) **Tamenglong Autonomous Region** → to be coordinated with **Churachandpur ADC**
- (vi) **Pherzawl Autonomous Region** → to be coordinated with **Churachandpur ADC**
- (vii) **Jiribam Autonomous Region** → to be coordinated with **Churachandpur ADC**

This structured coordination will help ensure consistency in governance, policy alignment, and service delivery across Kuki-administered areas within the Hill Districts.

14. Fair Compensation as per the LARR Act, 2013:

We respectfully urge that **fair and just compensation** be provided in accordance with the provisions of the **Land Acquisition, Rehabilitation and Resettlement (LARR) Act, 2013**, based on official property assessments and estimates by the respective Sub-Divisional Officers (SDOs) and Deputy Commissioners (DCs). Specifically:

- (i) **Provide fair compensation to Adivasi Kuki persons forcibly displaced from Imphal Areas**, including for **homestead land, buildings, jewellery, household properties, cash, vehicles**, and other assets. This must include **rehabilitation and resettlement plans** within the Hill Districts, including Kangpokpi, Churachandpur, Tengnoupal, Chandel, Pherzawl, and others.
- (ii) **Provide fair compensation to Adivasi Kuki persons forcibly displaced from Hill Villages**, including for **buildings, household properties, jewellery, cash, vehicles**, etc., in Kangpokpi District, Churachandpur District, Tengnoupal District, Pherzawl District, Chakpikarong Sub-Division (Chandel District), Hill Areas of Jiribam District and other Hill Districts. Rehabilitation must be ensured in their **native or original villages**.
- (iii) Provide fair compensation to landowners for the **road widening and improvement** project along the **Chakpikarong–Sajik–Aigejang–Khongtal** route in **Chakpikarong Sub-Division, Chandel District**.
- (iv) Provide full compensation amount to affected residents of **L. Jangnomphai (Veitum Khunou), N. Boljang (Erstwhhile, Natok Kuki), S.Saheibung (erstwhile Natok Kuki), Kangchup Geljang Sub-Division, Kangpokpi District**, for land acquired under the **New Broad Gauge Railway Construction** project.
- (v) Provide fair compensation to affected landowners for the **widening and improvement of Guite Road in Churachandpur District**.
- (vi) Provide full compensation amount to landowners for the **expansion of National Highways 2 and 37 in Kangpokpi District**.
- (vii) Immediately release pending bills of displaced Adivasi Kuki contractors whose completed public works were destroyed, tampered with, or demolished during the genocide violence.

15. Central Victim Compensation Fund (CVC)/ Manipur Compensation Scheme for Women Victims/Survivors of Sexual Assault/Other Crimes, 2023 as per the Provisions of Section 357A of Cr.P.C, 1973 or Section 396 of BNSS:

Ensure the provision of **fair and adequate compensation** of Rs 10 Lakhs each to the families of **deceased, injured, and sexual violence victims** from the Adivasi Kuki community and provide Govt. job to each of their kin under the **aforesaid Scheme**. Additionally, all **perpetrators and their accomplices**, acting with **common intent**, must be **identified, arrested, and prosecuted without delay**.

16. Appeal for Demolition of Illegal Constructions:

Demolish the illegally constructed Sanamahism worship structure within the jurisdiction of Phowoibi Village, Island Block, Kangpokpi District, along with other unauthorized constructions established within recognized Adivasi Kuki villages in the Hill Districts. These structures were erected without legal sanction and violate the territorial rights of the Adivasi Kuki community.

17. Urgent Call for Removal of Unauthorized Militant Camps in Kuki-inhabited Areas

We urgently call for the removal of unauthorized militant camps established in Kuki-inhabited areas, which pose a serious threat to peace, security, and the return of displaced communities. Specifically:

- (i) **Dismantle the UNLF (P) and MNRF camps** illegally and forcibly constructed at Thingkanbung (New S.L. Zougam), Machi Block, Tengenoupal District. *Location Coordinates: 24.624998, 94.108430*
- (ii) **Remove the UNLF (P) camp** illegally set up in the hill ranges of Satang Kuki village, Saikul Sub-Division, Kangpokpi District.

The presence of such unauthorized militant camps in the Scheduled Hill Areas of Manipur is not only unlawful but also endangers the fragile security environment and obstructs rehabilitation efforts of displaced tribal civilians. These encampments are a clear violation of territorial integrity and must be **evacuated without delay** to restore confidence and security among the displaced tribal population.

18. Stringent Action against Perpetrators of Violence:

We call for immediate and stringent legal action against all individuals, groups, and entities responsible for inciting, orchestrating, and executing violence against the Adivasi Kuki community. The following individuals and organizations, acting with common intent, have misused their positions and authority to promote enmity, distort facts, and perpetrate grave injustices:

1. Political Leaders:

- i. N. Biren Singh, former Chief Minister of Manipur,
- ii. Leisemba Sanajaoba, Member of Parliament (Rajya Sabha – Inner Manipur).
- iii. Meitei MPs, Ministers and MLAs

2. Militant Leaders and Cadres:

- i. Korounganba Khuman, Commander-in-Chief of Arambai Tenggol (AT), and his cadres,
- ii. Pramot Singh, Commander-in-Chief of Meitei Leepun, and his cadres,
- iii. Valley-Based Insurgent Groups (VBIGs/Meitei Militants),

3. Security Forces and Civil Participants:

- i. Manipur Police Commando,
- ii. India Reserve Battalions (IRBs),
- iii. Meira Paibis from Nongmeibung, Wangkhei, Soibam Leikai, Thangmeiband, Uripok, Ningthoukhong, Iroisemba, Khurai, and other locations,

4. Activists and Organizations:

- i. Khuraijam Athouba (COCOMI),
- ii. Wungnaoshang Kasar@Ashang Kasar (Indigenous People's Forum Manipur),
- iii. Gurumayum Barish Sharma (Former State President, BJYM, BJP MP)
- iv. Sapamcha Jadumani (Federation of Haomee),
- v. Moirangthem Edison, (AT Propagandist)
- vi. Micheal Lamjathang (Thadou Inpi Manipur) and TSA GHQ
- vii. Kangleipak Kanba Lup, IMF, WMC, FNCC and other accomplices.

These individuals and groups have acted in concert to falsely portray the Adivasi Kuki community as "illegal immigrants" or "refugees," despite their deep-rooted historical presence in the region.

They have actively spread misinformation, incited hatred, and made baseless accusations labelling Adivasi Kukis as "narco-terrorists," while deliberately concealing Meitei involvement in drug networks and land encroachment in the Hill Areas.

Their actions have included: Looting state armouries, Coordinated attacks involving abduction, lynching, rape, murder, and acts of extreme brutality—including burning victims alive, Publicly chanting genocidal slogans targeting the annihilation of the Adivasi Kuki community, Carrying out armed assaults, arson, looting, and forced displacement. As a result, over **220+ Adivasi Kuki villages in the Hill Districts** and more than **1,838+ homes in Imphal areas** have been destroyed or illegally occupied. The violence has claimed the lives of over **228+ individuals** and injured more than **481+ members** of the Kuki community. Despite overwhelming evidence, certain Meitei groups have continued to spread false narratives—falsely accusing Kuki men of sexual violence to incite retaliation, denying Meitei-led attacks, misrepresenting casualty figures to minimize Kuki losses, and shifting blame to obscure their own role in the provocation and escalation of conflict.

We demand that all perpetrators and accomplices be brought to justice under the full extent of the law.

19. Review of Suspension of Operation (SoO) Framework – Integrity Clause and Leadership Disconnect:

The **SoO Framework** signed in 2008 has become the subject of public distrust due to:

- Retention of the **Manipur Integrity clause** in its preamble;
- Perceived disconnect of SoO group leadership from tribal ground realities.

We urge:

- A review of the SoO preamble;
- Reassessment of SoO leadership participation;
- Expansion of the dialogue to include civil and traditional tribal leadership.

20. Census Records of India for Kangpokpi, Tengenoupal, Pherzawl, Kamjong, and Noney Districts:

The census records of India for Kangpokpi, Tengenoupal, Pherzawl, Kamjong (Chassad), and Noney Districts should be updated and registered in alignment with other districts. At present, the populations of these districts are still recorded under their former administrative districts, leading to unnecessary confusion and inconvenience for the residents. Accurate and district-specific registration is essential for proper governance, planning, and service delivery.

21. Repeal the Manipur (Hill Areas) Acquisition of Chief Rights Act, 1967: The Manipur (Hill Areas) Acquisition of Chief Rights Act, 1967, was enacted arbitrarily without the due consent or approval of the Kuki tribal chiefs, their descendants, or their respective tribes—who have inherited and sustained their ancestral lands for generations.

This Act violates the traditional rights of Kuki chiefs and the customary laws of Kuki tribes. It also contravenes several legal and constitutional provisions, including the Indian Succession Act, 1925; **Article 371C and the Hill Areas Committee Order, 1972:** The enactment of the Act **without the recommendation of the Hill Areas Committee (HAC)** is in clear violation of **Paragraph 4** and

Clause 9 of the Second Schedule, which reserves to the HAC exclusive legislative consultation on:

“The appointment or succession of Chiefs or Headmen.” **Non-Scheduled Tribe communities**, such as the **Meitei**, have **no legal standing** to interfere in such matters constitutionally reserved for tribal governance.

It also violates Article 31 or Article 300A of the Indian Constitution; and the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement (LARR) Act, 2013.

The Act was imposed by the Meitei-dominated state government with an ulterior motive—to extend the land revenue jurisdiction of the Valley Districts into the Hill Areas and to facilitate encroachment upon tribal lands. As the traditional Chief Rights serve as a key legal and customary safeguard for tribal land ownership, the state government, dominated by non-Scheduled Tribe Meiteis, has aggressively sought to abolish these rights. This was done through the misuse of legislative power, in an attempt to undermine the constitutional and customary protections afforded to Kuki tribal chiefs. The Act was imposed with the intent to undermine the traditional land rights of the Tribal Kuki people and to facilitate exploitation under the Meitei-dominated state government.

22. Urgent Establishment of District and Sessions Courts in Kangpokpi, Tengnoupal, and Pherzawl Districts:

The districts of **Kangpokpi, Tengnoupal, and Pherzawl** encompass vast and difficult terrain, making access to civil and criminal justice particularly challenging for the residents, especially the tribal Kuki population. At present, most legal matters originating from Kangpokpi District are being adjudicated at the District and Sessions Court located in Senapati, which imposes substantial logistical and financial burdens on litigants and adversely affects timely justice delivery.

This lack of judicial infrastructure:

- Denies effective access to justice for Scheduled Tribe communities residing in the Hill Districts;
- Overburdens existing courts in adjacent districts;
- Contravenes the principles of equitable justice and the mandate of Article 39A of the Constitution.

We therefore urge the Hon’ble Union Government and the Hon’ble Chief Justice of the High Court of Manipur to:

- Establish **District and Sessions Courts** in Kangpokpi, Tengnoupal, and Pherzawl Districts;
- Appoint **District and Sessions Judges** and necessary judicial staff in these districts;
- Ensure that all subordinate courts are adequately staffed and functional within their respective jurisdictions.

This institutional strengthening is critical to uphold the **rule of law, equality before the law, and access to justice** in Manipur’s Hill Areas, in line with constitutional values and judicial mandates.

23. Appeal for Establishment of High Court Benches in Churachandpur and Kangpokpi Districts:

The urgent establishment of High Court Benches in Churachandpur and Kangpokpi Districts is essential to ensure equitable access to justice for the Adivasi Kuki community. Since the onset of the May 3, 2023 violence, members of the community have been unable to safely access the Manipur High Court, which is perceived to operate under a predominantly Meitei administration and legal environment. This has raised serious concerns regarding the impartiality and fairness of judicial proceedings, leading to a growing lack of confidence in the current composition of the High Court bench.

In this context, the replacement of Meitei judges currently serving at the Manipur High Court is also necessary to restore trust and guarantee judicial neutrality. Given the high cost and inaccessibility of the Supreme Court, localized High Court Benches would help ensure that justice is accessible, timely, and impartial. Furthermore, the establishment of these benches would:

(i) Eliminate regional bias and perceived majoritarian influence; (ii) Address the challenges of physical inaccessibility and safety concerns; (iii) Reduce travel time and litigation costs for residents of the Hill Districts; (iv) Decrease the workload of the Principal Bench in Imphal; (v) Facilitate the inclusion of local customs, laws, and socio-cultural nuances in legal proceedings; (vi) Promote faster case disposal and efficient judicial delivery; (vii) Stimulate local economic growth by attracting lawyers, litigants, and legal professionals; (viii) Enhance judicial infrastructure in Churachandpur, Kangpokpi, Pherzawl, Tengnoupal Hill Districts.

In sum, setting up High Court Benches in these regions is not only a matter of administrative necessity but also a fundamental step toward achieving justice, equity, and constitutional fairness for marginalized communities in Manipur.

"The establishment of High Court Benches in Churachandpur and Kangpokpi Districts is both essential and inevitable to ensure equitable access to justice for the Adivasi Kuki community in the Hill Districts."

24. Appeal for Establishment of Office of the Registrar General of the High Court in Churachandpur District:

Since the outbreak of the genocide campaign on 3rd May 2023, launched by Meitei groups against the Adivasi Kuki community, the two communities have become geographically separated, with clear territorial divisions between the Hill Districts and the Valley Districts.

As a result, the Manipur High Court in Imphal is no longer accessible to the Adivasi Kuki people residing in the Hill Districts. This has created numerous challenges, including:

- Severely limited access to justice;
- Delayed case resolution;
- Lack of adequate legal representation;
- Continued marginalization under a majoritarian Meitei-led state administration.

We therefore urge the **establishment of an office of the Registrar General of the High Court in Churachandpur District**, to:

- Facilitate administrative coordination with tribal bar associations and ADCs;
- Promote equitable legal access and case management;
- Improve efficiency in case filing, listing, and service of legal documents.

This measure is both essential and inevitable for ensuring justice, equitable legal access, and administrative efficiency for the Adivasi Kuki community.

25. Appeal for Establishment of Central Universities in Kangpokpi, Tengenoupal, and Churachandpur Districts:

Establishing Central Universities in Kangpokpi, Tengenoupal, and Churachandpur Districts is essential to ensuring equitable access to higher education for Adivasi Kuki students, who continue to face significant barriers due to the geographic and ethnic division between the Valley and Hill Districts, particularly since the events of May 3, 2023.

Such institutions would play a vital role in addressing long-standing injustices and disparities faced by the Adivasi Kuki community, including limited access to quality education, healthcare, and economic opportunities. A Central University in these districts would promote inclusive development by creating pathways for Adivasi Kuki students to pursue higher education and meaningful careers, thereby contributing to the broader progress of the region and the nation.

26. Appeal for Provision of Emergency Medical Helicopter/Air Ambulance Services in Hill Districts:

In the Hill Areas of Kangpokpi, Churachandpur, Pherzawl, and Tengenoupal Districts, proper healthcare facilities such as intensive care units and super-specialty medical equipment are severely lacking. The number of Medical Officers and Nurses is also insufficient. During critical and time-sensitive emergencies, it is extremely difficult to access advanced medical facilities in Guwahati or Shillong due to poor road connectivity and long travel times.

We respectfully appeal for:

- **Provision of an air ambulance or medical helicopter service** to serve these remote districts;
- **Deployment of trained emergency medical teams** capable of handling trauma, maternal, and pediatric cases;
- **Establishment of landing facilities and medical helipads** in key locations within each of the mentioned districts.

This initiative is essential to ensuring timely, life-saving medical transportation and equitable healthcare access for the residents of these vulnerable and underserved regions.

27. Appeal for Continued Restraint on Free Movement between Hill and Valley Districts:

Strict maintenance of **buffer zones between the Hill Districts and the Valley Districts** is imperative to prevent further clashes between the Meitei and Adivasi Kuki populations. This

measure should remain in place **until the Union Territory with Legislature demand is formally addressed and resolved in Parliament.**

Constitutional safeguards for the Adivasi Kuki people and their ancestral lands under **Article 239A** must be prioritized before any relaxation of movement is considered.

28. Urgent Appeal for Acquittal of Falsely Charged Adivasi Kuki Leaders and Restraint by Investigative Agencies:

Law enforcement agencies, including the **NIA, CBI, and state police**, must refrain from arbitrarily arresting **Adivasi Kuki leaders** who have represented and defended their community against grave atrocities and systemic injustices. These individuals have been falsely charged in numerous cases arising from the conflict triggered on May 3, 2023.

We urge the Government of India to:

- **Ensure unconditional acquittal of all falsely charged tribal leaders;**
- **Review all pending cases and FIRs filed without due process;**
- Prevent any misuse of investigative agencies for politically motivated or ethnically biased purposes.

These arrests appear to target those who have defended the Adivasi Kuki community against acts perpetrated by state-sponsored radicalized **Meitei militias**—acts allegedly supported by certain **MPs, Ministers, MLAs, police commandos, IRBs, Meira Paibis, COCOMI, Meitei civil society organizations, and select local media outlets.**

We respectfully demand urgent central oversight, legal rectification, and protection of legitimate community leadership.

29. Continue Imposition of President's Rule:

We urge the Union Government to **continue the imposition of President's Rule in the State of Manipur**, in light of the current situation and the continuing ethnic tensions between the Meitei and Adivasi Kuki communities.

Since the enforcement of President's Rule, there has been a **marked decline in violence, loss of life, and destruction of property.** The humanitarian situation has stabilised to a certain extent, and the number of displaced persons has not escalated further—indicating that central intervention has played a key role in maintaining peace and preventing fresh confrontations.

However, the underlying issues remain unresolved. The geographical, administrative, and communal divide continues to deepen, and there is a **grave risk of renewed escalation** if state control is prematurely reinstated.

30. Restraint on Deployment of Meitei Officers and Jawans in Hill Districts and Fringe Areas of Manipur:

Tensions and violence have frequently escalated in the Hill Districts and fringe areas wherever Meitei officers or Jawans are deployed under various security formations, including the Indian Army, Assam Rifles, CRPF, BSF, and Manipur Police. Their presence has consistently been

associated with **biased operational conduct**, favouring the Meitei community at the cost of the safety, dignity, and rights of Adivasi Kuki civilians.

Numerous reports and incidents reveal that these deployments have often resulted in **unprovoked intimidation, arbitrary detentions, targeted searches, and violence** against unarmed civilians in the Hill Areas, thereby exacerbating fear, mistrust, and resentment within the community.

In this context, we earnestly urge the Ministry of Home Affairs to take the following actions:

1. **Immediately halt the deployment of Meitei officers and personnel** in Adivasi Kuki-inhabited areas and sensitive fringe zones;
2. **Ensure that all security deployments in the Hill Districts are composed of neutral personnel** from outside the state or from non-involved communities;
3. **Establish independent monitoring mechanisms** to oversee the conduct and impartiality of security forces operating in the Hill Districts;
4. **Implement community liaison structures** involving local tribal representatives to ensure transparency and trust in security operations.

The **continued presence of Meitei personnel poses a grave threat** to peace-building and communal reconciliation. It also severely undermines the constitutional promise of equality, impartial protection, and non-discrimination.

The deployment of neutral security forces is not only imperative for restoring peace and order but is also essential to rebuild the shattered trust between the state and the Adivasi Kuki people. We appeal for your timely intervention in the interest of justice, security, and national unity.

31. Appeal to discredit Fabricated Colonial-Era Orders Used to Delegitimise Kuki Land Rights:

Recent attempts to delegitimise Kuki ancestral land claims rely on selective references to alleged Standing Orders from the Manipur State Durbar era, such as the supposed 1933 order by T.A. Sharp declaring Kukis as “aliens and refugees” in Naga areas, and a 1941 order requiring Kukis to seek permission from Naga chiefs before settlement. These claims lack verifiable archival support and contradict established colonial records.

No authenticated official copies of these so-called Standing Orders exist in the British Library India Office Records, National Archives of India, or Assam State Archives. Further, such orders would have no legal standing in matters of tribal status, land rights, or revenue jurisdiction—areas governed by formal legislation, not Durbar instructions.

Colonial-era ethnographers and administrators—including R. Brown (1873), J.H. Hutton (1931), and T.C. Hudson (1908)—explicitly documented the Kukis as native tribes of Manipur with established village territories, political institutions, and martial recognition. The Kuki Rebellion of 1917–1919 was also acknowledged as an internal uprising by a native community.

Therefore, any reliance on fabricated or unauthenticated orders to portray Kukis as “refugees” or “non-natives” of Manipur is historically, legally, and morally indefensible. Such fabrications are part of a broader pattern of narrative manipulation aimed at eroding tribal land rights.

We urge the Union Government to:

- i. Acknowledge the **customary and historical land rights** of the Kukis as native inhabitants;

- ii. Reject and discredit the use of **unverified colonial documents** to undermine Scheduled Tribe claims;
- iii. Support **archival transparency and verification** to counter historical distortion.

32. Clarification on Historical Relief and Repatriation Status of the Kukis (1957–1968):

The **Government of India** formally recognized the displacement of the **Kuki people from Burma (now Myanmar)** and extended relief assistance following their repatriation to Indian Territory. This recognition is documented in **Memo No. P3/9/66** from the **Ministry of Home Affairs**, which records the provision of relief funds to repatriated Kuki families.

In accordance with this acknowledgment, the **Manipur State Government** disbursed payments to affected Kuki repatriates on four separate occasions:

- **22 April 1957**
- **7 July 1959**
- **28 February 1966**
- **18 July 1968**

These disbursements constitute official recognition of the Kukis' **refugee and repatriate status**, and substantiate the Government's commitment to support their resettlement. They are not Illegal immigrants as alleged by some Radical Organisation to **Delegitimise Kuki Land Rights**.

Furthermore, the **Parliament of India**, in a **Lok Sabha Q&A dated 13 November 1968** (Unstarred Question No. 513, Ministry: External Affairs), addressed the issue of **compensation for Indian repatriates from Burma**. This record includes references to Kuki repatriates under the broader framework of Indian returnees displaced by geopolitical events in Burma, particularly following **Operation Khawdownmi** and subsequent Burmese nationalisation policies that adversely affected Indian-origin communities.

Population Trends Confirming Historic Settlement and Non-Abnormal Growth:

Census records from the late 19th and early 20th centuries confirm a consistent and legally documented **Kuki population** in Manipur:

- **1881:** 25,384
- **1901:** 28,000
- **1911:** 44,431
- **1921:** 66,255
- **1931:** 79,066
- **1951:** 1,00,748

These figures affirm that the **Kuki presence in Manipur predates Indian independence**, and that population growth has been **organic and historically continuous**. By 2025, demographic estimates place the Kuki population at approximately **8, 00,000**, reflecting normal growth patterns over seven decades. No evidence suggests abnormal or artificial demographic expansion.

33. Urgent Appeal for the Development of a Dedicated Road Corridor to the Hill Areas of Manipur:

Since the outbreak of the **ethnic violence and genocidal campaign on May 3, 2023**, the **lifeline of the Hill Areas** has been severely disrupted. The arterial routes connecting the tribal Kuki-dominated hill regions to the rest of the country have been **blockaded, vandalized, or rendered unsafe** due to continuous threats and targeted aggression.

This has resulted in:

- **Obstruction of emergency medical services** and acute shortage of life-saving drugs;
- **Disruption of essential commodity supply chains**, including food, fuel, and infant nutrition;
- **Denial of safe passage** to tribal populations, leading to large-scale suffering and humanitarian crises.

The existing roadways are no longer reliable or secure for the Adivasi Kuki population. These disruptions have created **systematic economic strangulation**, curtailed mobility, and isolated the Hill Areas from governance, relief, and rehabilitation mechanisms.

In view of the above, we urge the Government of India to:

- **Sanction and construct a new all-weather road corridor** that provides **exclusive, safe, and unhindered access to the Hill Districts**;
- Declare the proposed route as a **strategic and humanitarian corridor** under central security control;
- Allocate **special infrastructure funding** for hill connectivity under the Ministry of Road Transport & Highways, MoRD, MDoNER and MoTA;
- Ensure tribal consultation and oversight in the road's planning and implementation.

Such a corridor is **inherent, inevitable, and indispensable** for the survival, security, and long-term development of the tribal Kuki people.

34: Immediate redressal Measures and Constitutional Demands:

Given the above grievances, we respectfully urge the Hon'ble President of India and the Union Government to:

1. Recommend the **creation of Kukiland Union Territory with Legislature** (Puducherry Model) under Article 239A of the Constitution;
2. Safeguard the **traditional chieftainship system** and customary land ownership of Scheduled Tribes;
3. Restore and reinforce the constitutional and legal primacy of the **Hill Areas Committee** in all Scheduled Matters;
4. Halt all activities in tribal lands conducted without the consent of **Autonomous District Councils** or village authorities;
5. Recognize that **non-Scheduled Tribes (Meiteis and others)** have no legal or moral authority to interfere in tribal governance, culture, or territory.

Conclusion:

The creation of Kukiland Union Territory with Legislature is no longer a political aspiration, but a necessary constitutional and humanitarian measure. It is essential to restore dignity, justice, and security to the Adivasi Kuki people.

We trust in your commitment to uphold the Constitution, protect Scheduled Tribes, and ensure a peaceful future for all communities in Manipur.

With deepest respect and urgency,



[Lenin Haokip]

Legal Affairs Secretary

Kuki Inpi Manipur

Email ID: [paominlen.haokip@gmail.com]

Contact: [9366562510]

Dated: 1st August, 2025

Copy to:

1. The Registrar, Supreme Court of India, Tilak Marg, New Delhi
2. The Ministry of Home Affairs, Government of India
3. The Ministry of Tribal Affairs, Government of India
4. The Ministry of Rural Development, Government of India
5. The Ministry of DoNOR, Government of India
6. The Hon'ble Chairperson, NCST. Delhi
7. Shri Nirupam Chakma, Hon'ble Member, NCST, New Delhi
8. The Hon'ble Governor, Manipur



भारत सरकार द्वारा मान्यता प्राप्त
(Recognised by Government of India)
Registered Under Societies Registration Act XXI of 1860
Registration No.: 49/1967-68(Old), New Regn.No. : 160/2006-07

अखिल भारतीय आदिवासी विकास परिषद Akhil Bharatiya Adivasi Vikas Parishad

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Kolkata, West Bengal

Prakash Velip
Ex. Minister, Goa

Joint Secretaries

Bala Bachchan, MLA
Ex. Minister, MP

Talo Mugli, Ex.Minister
Arunachal Pradesh

Girish Kumar Meena
Joint Secretary

Tsherring Lepcha
State President, Sikkim

Ref. No. **ABAVP/PS(I)/2025/04**

01/08/2025
Date:/...../2025

To,

**Smt. Droupadi Murmu Ji,
Hon'ble President of India,
Rashtrapati Bhavan, New Delhi – 110004**

Subject: Endorsement of the Memorandum Submitted by Kuki Inpi Manipur (Ref.01/KIM/Memo/PS(I)/2025/01) Regarding the Humanitarian Crisis in Manipur

Respected Rashtrapati Ji,

The **Akhil Bharatiya Adivasi Vikas Parishad (ABAVP)**, being a national platform committed to the protection and advancement of the constitutional, social, and territorial rights of all Adivasi and Scheduled Tribe communities in India, writes to extend its unequivocal **endorsement and solidarity** with the Memorandum submitted by **Kuki Inpi Manipur**, dated **1st August 2025** (Ref.01/KIM/Memo/PS(I)/2025/01), regarding the **grave and ongoing humanitarian crisis** affecting the Adivasi Kuki community in Manipur.

Having reviewed the content of the aforementioned Memorandum, we fully **support the concerns, facts, and demands** presented therein, which outline in clear and substantiated terms:

- The **targeted ethnic violence** against the Adivasi Kuki community since 3rd May 2023;
- The **unlawful displacement, mass killings, destruction of homes and villages**, and continued denial of basic human rights and protections;
- The **systemic violations** of constitutional provisions including **Articles 14, 21, 25, 300A, and 371C**, and other statutory protections accorded to Scheduled Tribes under various central laws;
- The **role of radical elements and state complicity** in fuelling violence and obstructing justice;
- The urgent need for **Army protection, neutral security deployment, AFSPA enforcement in Valley Districts**, and **continued President's Rule** to safeguard peace and justice;
- The legitimate and long-standing **demand for Union Territory with Legislature** status for the tribal-dominated Hill Areas of Manipur as a means of guaranteeing autonomy, safety, and self-governance.



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R. C. Verma, IRS(Retd)

R. S. Nautial
Ex. Zila President

Secretaries

Birsa Tirkey, IRS(Retd)
Chairman,
Tribal Development Board
Kolkata, West Bengal

Prakash Velip
Ex. Minister, Goa

Joint Secretaries

Bala Bachchan, MLA
Ex. Minister, MP

Talo Mugli, Ex.Minister
Arunachal Pradesh

Girish Kumar Meena
Joint Secretary

Tsherring Lepcha
State President, Sikkim

Ref. No. **ABAVP/PS(I)/2025/04**

Date: **01/08/2025**/2025

As a national body representing Adivasi interests across India, we urge your good office to treat this matter with the **highest priority** and intervene through all available constitutional and administrative mechanisms to ensure the safety, dignity, and rightful protection of the Kuki tribal community in Manipur.

We appeal to the Indian Army under your leadership to continue upholding its sacred constitutional duty of **protecting the lives of all Indian citizens, particularly those who have been rendered vulnerable due to systemic violence and neglect.**

We also respectfully request that the Indian Army consider deploying additional neutral security forces in volatile areas of Manipur's Hill Districts, and help facilitate relief, rehabilitation, and return of displaced Kuki families to their ancestral lands.

We stand in full **solidarity with the Adivasi Kuki community** and extend our unwavering support to the **Kuki Inpi Manipur's legitimate representation and demands.**

With utmost respect and sincerity,

Yours faithfully,

(Luckybhau Jadhav)
National Youth President
Akhil Bharatiya Adivasi Vikas Parishad
Email: luckyjadhav75@gmail.com
Phone: +91-9763191270
Dated: 1st August, 2025

Copy to:

1. The Ministry of Home Affairs, Government of India
2. The Ministry of Tribal Affairs, Government of India
3. The Hon'ble Chairperson, NCST, Delhi
4. Shri Nirupam Chakma, Hon'ble Member, NCST, New Delhi
5. The Hon'ble Governor, Manipur

पत्राचार का पता : प्लॉट नं. 101, एफ-विंग, एका बिल्डींग, पाथर्डी गांव, नाशिक

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**GOVERNMENT OF MANIPUR
SECRETARIAT: HOME DEPARTMENT**

ORDERS BY THE GOVERNOR: MANIPUR

Imphal, the 10th October, 2023

No. H-3608/2/2023-HD-HD: Whereas, the Hon'ble Supreme Court of India passed orders dated 25-09-2023 in the Special Leave Petition (Civil) Diary No.19206/2023 [Dinganglung Gangmei Versus Mutum Churamani Meetei & Ors] with connected cases giving directions as mentioned inter alia below:

"4(ii) The situs of these religious buildings be protected from encroachment and the buildings be protected from damage/ destruction.

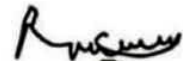
"(iii) The Government of Manipur should ensure the protection of the properties of the displaced persons as well as the properties which have been destroyed/ burnt in the violence and prevent their encroachment. In case any property has been encroached, the encroachers be directed to forthwith remove their encroachment, failing which the person concerned would be liable for contempt of court for non-compliance of the orders of the Supreme Court of India."

2. Whereas, the State Government views the matter very seriously with utmost sensitivity as any such incident may further ignite or aggravate law and order situation in the State.

3. Respective Deputy Commissioners and Superintendents of Police have been advised suitably to take action vide Home Department letters No.H-2002/4/2023-HD-HD dated 03-10-2023 and to implement the aforesaid directions of the Hon'ble Supreme Court of India.

4. Now, therefore, the Governor of Manipur is also pleased to reiterate for general public/ Organizations that nobody without any exception shall violate the orders passed by the Hon'ble Supreme Court of India as mentioned in Para No.1 under any circumstances. Anybody found violating the same shall be booked under relevant provision of law of the land for the time being in force and shall be liable for contempt of the Hon'ble Supreme Court of India. The State Government also appeals to all concerned including public functionaries to comply with the Court's orders dated 25-09-2023 to avoid any Contempt proceedings.

By orders & in the name of Governor,



(T. Ranjit Singh)

Commissioner (Home), Government of Manipur.

Copy to:

1. Secretary to Governor, Manipur.
2. Secretary to Chief Minister, Manipur.
3. Chief Secretary, Government of Manipur.
4. ADGP(Intelligence), Manipur and Overall Operational Commander.
5. All District Magistrates of Manipur
6. All Superintendent of Police of Districts.

**to take up all necessary
precautionary and preventive
measure within their respective
jurisdictions to avoid untoward
event**

Copy also to:

1. Shri Kuldip Singh, IPS (Retd), former DG (CRPF), Security Advisor to Government of Manipur.
2. Director (IPR), Manipur for causing wide publicity of the above orders through Media Houses as news items.