

Conservation, Relocation, and Constitutional Justice: Governance Challenges in the Expansion of Core and Buffer Zones in India's Tiger Reserves

Ms. Simran Santani

Project Associate, IIM Indore, Rau-Pithampur Road, Indore

Prof. Sunder DL

IIM Indore

ABSTRACT:

Over the past five decades, India's tiger conservation framework has emerged as one of the most ambitious large carnivore recovery programmes in the world. Yet, the expansion of Core (Critical Tiger Habitat) and Buffer zones within tiger reserves, while ecologically justified to enhance habitat connectivity and species viability, often clashes with the rights and livelihoods of forest-dwelling and indigenous communities. This paper critically explores the governance challenges embedded in relocation policies linked to tiger reserve expansions, positioning the analysis at the intersection of conservation science, environmental law, and constitutional justice. Employing a qualitative systematic review of twelve academic works alongside policy and judicial documents, the study reveals a persistent tension between biodiversity goals and rights-based governance. Although tiger populations have rebounded, relocation efforts frequently result in livelihood insecurity, inadequate rehabilitation, and procedural lapses in securing Free, Prior and Informed Consent (FPIC), compounded by inconsistent enforcement of legal protections. The entrenched fortress conservation paradigm, which views human presence as incompatible with biodiversity, further marginalizes forest-dependent communities and intensifies governance conflicts. Arguing for a transformative shift, the paper advocates participatory, evidence-driven, and constitutionally grounded governance frameworks that integrate ecological science with social equity. It underscores the imperative for tailored rehabilitation, interdisciplinary assessments, robust legal compliance, and coexistence-centered conservation strategies to reconcile ecological imperatives with community rights and constitutional mandates, advancing a more just and sustainable model for tiger conservation in India.

KEY WORDS: Tiger Reserves; Forest Dwellers; Resettlement; Core and Buffer Zones; Forest Rights Act 2006

INTRODUCTION:

India is home to over 70% of the world's wild tiger population and is often cited as a prime example of large carnivore recovery in areas dominated by human activity (Jhala et al., 2021). The enhancement of tiger conservation governance was initiated by the 2006 amendment to the Wildlife Protection Act, 1972, which led to the creation of the National Tiger Conservation Authority (NTCA) and established a structured model for managing tiger reserves. These reserves comprise Core (Critical Tiger Habitat) and Buffer zones. The Core areas are identified as inviolable breeding habitats that are essential for supporting a demographically sustainable tiger population (Wildlife Protection Act, 1972 amended in 2006; NTCA). Core areas in tiger reserves are being enlarged for ecological reasons. Tigers need large areas of undisturbed forest habitats for their survival, reproduction, and access to food. Also, as tiger populations grow, they need more space so that they do not fight among themselves over territories. Sometimes, breeding habitats, water sources, and corridors of wildlife may also lie outside the existing core areas of tiger reserves, and hence there is a need to extend these areas to save these critical habitats. Therefore, it is not administrative or institutional goals that drive the extension of core areas in tiger reserves but the need to maintain ecological stability and tiger populations. It has been scientifically estimated that a stable tiger population of 100 tigers demands a landscape of 800 to 1000 square kilometres (Mandal et al., 2024). However, such habitats in large tracts are becoming hard to find in the densely populated regions. In India, tiger reserves cover an area of 2% of the country's land surface. In many cases, many tiger habitats are below optimal levels (Nautiyal et al., 2023; Mandal et al., 2024). As early as 2005, it has been found that a large number of villages are found in the tiger habitats - around 1,500 villages and 65,000 families in the tiger habitats in India (Ministry of Environment and Forests, 2005). In this scenario, it has been suggested that the relocation of villages can be a viable option in tiger conservation to ensure tiger breeding habitats and source populations (Mandal et al., 2024). However, the global expansion of protected areas has been criticized on various fronts. It has been stated that conservation efforts are not equitably distributed in terms of costs and benefits. It has been argued that biodiversity conservation provides collective goods but it also imposes costs on local communities by limiting access,

disturbing livelihoods, and displacing them (Krueger, 2009). Fanari (2019) positions the relocation of populations within the broader historical context of conservation-related dispossession. It has been argued that relocation of populations is a form of structural violence when it is undertaken without agency and proper protection. Exclusionary conservation, rooted in wilderness ideals, has frequently portrayed forest-dependent communities as threats rather than partners in environmental stewardship (Dowie, 2009). Empirical research highlights the socio-economic risks associated with conservation-induced displacement, including impoverishment, livelihood loss, cultural disruption, and erosion of traditional ecological knowledge (Cernea & Schmidt-Soltau, 2003; Brockington & Igoe, 2006; Torri, 2011). It is observed that uneven results have been reported from studies conducted in Similipal Tiger Reserve, where some people have benefited from the development of infrastructure, but there is economic instability due to the loss of livelihoods in the forest.

In response to historical injustices in conservation, India enacted the Forest Rights Act (FRA), 2006, which recognizes the rights of forest dwellers and mandates safeguards prior to relocation. The relocation of people from Core/Critical Tiger Habitats is governed under Section 38V (5) of the Wildlife (Protection) Act, 1972 (amended in 2006), which reads along with Section 4(2) of FRA, 2006. This also asserts that it should be of a voluntary nature. Disclosures made by Parliament show that 257 villages have been relocated on a voluntary basis under this legal framework (Press Information Bureau [PIB], 2025), and financial assistance has been made available through Project Tiger.

However, the implementation process has been challenged too. Ministry of Tribal Affairs (MoTA) has recently issued a directive to all state governments to obtain detailed data regarding villages and families residing in tiger reserves, along with any claims made under the Forest Rights Act and the process of relocation (Indian Express (January 15th, 2025). This directive from MoTA has come on account of complaints from Gram Sabhas residing within tiger reserves such as Durgavati in MP, Tadoba in Maharashtra, and several other tiger reserves, where there have been allegations of coercion and force being used for vacating these traditional habitats of residents without any recognition of rights. The Ministry of Tribal Affairs, therefore, pointed out that under Section 4(2) of the Forest Rights Act, there exists a prohibition of illegal eviction and demands free, prior, and informed consent for such relocation. By demanding reports from the states regarding the demographic details, status of claims, and procedures of payment of compensation, MoTA seems to be expressing increasing concern over the issue of accountability in relocation procedures. These developments reveal that relocation from tiger reserves is not merely a technical conservation intervention but an ongoing site of institutional negotiation between conservation authorities, tribal welfare institutions, state governments, and local communities. The gap between formal reporting mechanisms that describe the voluntary nature of the processes and the complaints of the people at the grassroots level highlights the importance of such an evaluation.

Records and arguments, available on Supreme Court Observer, such as in the *Wildlife First v. Union of India* (updated as on 28th July 2025) case, also highlights the constitutional and governance complexities involved in the protected area regime in India. Essentially, the discussion reveals a fundamental contradiction between ecological necessities such as the establishment of inviolate breeding habitats and a 'rights-based' approach to governance that privileges community consent, distributive justice, and historical redress (Indiakanoon, nd). Thus, the relocation from tiger reserves needs to be seen as a complex 'governance' phenomenon that intersects the fields of conservation biology, environmental law, federal administration, and social justice. While the 'conservation' perspective privileges habitat consolidation and demographic viability, critical scholarship has increasingly pointed to power imbalances, livelihood risks, and procedural shortcomings. More recently, the administrative measures initiated by the Ministry of Tribal Affairs have once again brought the issue of the relocated communities' compliance into the foreground.

This study examines the process and effects of relocating forest-dwelling communities. It reviews ecological reasons, social and economic impacts, and evaluates legal and institutional protections.

OBJECTIVE:

In light of the ongoing debate about conservation-related displacement and the expansion of core and buffer zones in tiger reserves, this study examines the process and effects of relocating forest-dwelling communities, particularly tribal groups, from protected areas in India. It also examines the rationale for relocating communities from protected areas from an ecological perspective and assesses the social and economic implications of relocation on displaced communities. The study

also seeks to assess the effectiveness of the existing mechanisms of law in dealing with the problem of relocation. The study, by bringing together existing literature, policy, and judicial pronouncements, seeks to assess whether the model of voluntary relocation is able to strike a balance between biodiversity conservation and the principles of equity, justice, and rights.

SCOPE:

The present study is limited to a review of the available literature on the phenomenon of conservation-induced displacement and relocation with specific reference to tiger reserves in India. The study has primarily used secondary sources of data, which include research articles, monographs, academic journals, policy studies, government publications, and newspaper reports. It focuses specifically on tiger reserves, examining the ecological rationale behind the expansion of core and buffer zones and the resulting relocation of forest-dwelling communities, particularly tribal populations. It is an analysis based on the literature on the conservation goals and the social, economic, and legal consequences of the relocation. This can later be followed up by undertaking any primary research.

METHODOLOGY OF REVIEW:

The current review employs a qualitative and systematic approach in exploring the issue of conservation-related displacement and relocation of forest dwellers. The review focuses on relocations from tiger reserves and their consequences in India. In order to conduct the review, literature has been gathered from various scholarly information websites, which include Google Scholar, ResearchGate, JSTOR and similar open-source academic sites. In addition to the scholarly literature, relevant information was also obtained from policy documents, government publications, and responses from parliament to obtain a holistic understanding of the subject. To be specific, relevant information was obtained from official publications issued by the Press Information Bureau (PIB), Government of India, with regard to the relocation of villages from core and critical tiger habitats. Furthermore, relevant documents and arguments related to the Supreme Court Case *Wildlife First v. Union of India* (Writ Petition No. 109/2008) were also referred to understand the legal context concerning eviction and recognition of forest rights. Relevant keywords were used for the literature search, and the keywords included conservation-induced displacement, relocation of people from tiger reserves, forest dwellers, protected areas, critical tiger habitats, the Forest Rights Act of 2006, rehabilitation and resettlement, and livelihood impacts of relocation, etc. Boolean operators AND and OR were also employed for the literature search. The review article has included literature from 2005 to 2025, which covers basic and recent literature on the topic of conservation and relocation. Literature selection was made in accordance with the inclusion and exclusion criteria. The inclusion criteria consisted of journal publications, academic studies, institutional publications, and governmental publications directly relevant to the subject of the relocation of the forest dwellers, with a special emphasis on the relocation of the inhabitants from tiger reserves and other protected areas. The exclusion criteria were applied to the publications that were not directly relevant to the objectives of the research, duplicate publications, and publications lacking relevance to the topic under study. After a rigorous screening of the publications, twelve research papers were selected. Relevant governmental publications were also included in the analysis. The body of literature selected for analysis was examined through a thematic analysis method. The studies included in the research process were analyzed to identify the principal themes, which included the reasons for relocation from tiger reserves, the impact of relocation, social and cultural impacts, rehabilitation, and the legal framework. The thematic analysis framework helped in the formulation of a comprehensive understanding of the displacement in the context of conservation and also identified the gaps in the existing literature. The selected studies were analyzed using thematic and narrative analysis. Each article was analyzed separately to identify the main issues, findings, and conclusions regarding the displacement of people from conservation areas, including tiger reserves, among others. A doctrinal method was also adopted for the analysis of relevant legal documents in order to understand the relevant legal framework regarding the displacement of people from forests. This has helped in the identification of common themes, patterns, and issues.

DISCUSSION AND ANALYSIS:

Straede and Treue (2005) claims that conservation and buffer zone regulations fail to reduce forest-dwelling people' reliance on protected area resources. The study found that people living in and near Royal Chitwan National Park derived most of their livelihood and income from forest products, while buffer zone forests were unable to sufficiently replace these resources. This shows a fundamental difficulty by the government, as conservation rules limit access which do not provide adequate livelihood alternatives, creating dependence and conflict. The report also covers

the impact of relocation and buffer zone measures in addressing the primary reasons of resource dependence. To solve these issues, the authors suggest to execute participatory governance mechanism, permitting access to forest resources in a regulated manner, and involving local people in conservation decision-making to maintain a balance between conservation goals and livelihood demands.

One of the case studies by Kabra (2009) illustrates that conservation-induced displacement has resulted in severe decline on the agrarian livelihoods of Adivasi communities, mainly the Sahariya tribe in Kuno Wildlife Sanctuary. Before relocation, these communities depend on diversified livelihood systems that includes agriculture, livestock, and produce from the forest, which guarantee food security and economic stability. However, post-displacement, agricultural income declined radically due to poor-quality of land, lack of water, loss of livestock, and breakdown of social and credit networks, forcing large number of households into wage labour and increasing poverty. The Author emphasized that relocation policies & rules most of the time fail to restore livelihood security and instead led to long-term socio-economic vulnerability. To overcome these challenges, the study recommends context-specific rehabilitation measures, improvement of irrigation and land facilities, restoration of integrated farming systems, rebuilding of social support networks, and a larger community participation in restoration planning to ensure both livelihood and conservation justice.

Mahesh Rangarajan and Ghazala Shahabuddin (2006) critically scrutinize the discussion surrounding displacement from protected areas by incorporating biological and social science perspectives. They contend that conservation policies regularly rest on the premise that presence of human intrinsically threatens biodiversity, whereby legitimizing relocation and the formation of “inviolable” zones. However, ecological research disclose that human nature interlinkage is nuanced and context-dependent, with certain traditional land-use practices historically contributing to the conservation of biodiversity. At the same time, social science studies points to significant livelihood disruptions, impoverishment, and marginalization resulting from relocation, often compounded by insufficient legal protections and insufficient rehabilitation measures. The authors recognize critical research gap: the lack of comprehensive ecological and socio-economic assessments informing relocation decisions. They recommend for interdisciplinary collaboration, comprehensive analysis of both ecological and social impacts, enhanced transparency in relocation policies and rules, and a paradigm shift away from coercive fortress conservation toward approaches that integrate scientific evidence with equity principles, accountability, and livelihood justice.

Mariacostanza Torri (2011) inspects the Sariska Tiger Reserve to demonstrate how top-down conservation policies which are based on strict protection and forced relocation have resulted in significant livelihood losses, social disruption, and conflicts between local communities and forest authorities. Enforcement of restrictions on forest access curtailed valuable income-generating activities such as grazing, collection of fuelwood, and agriculture. Additionally, relocation sites frequently offered inferior land quality and insufficient infrastructure, aggravate economic insecurity and stimulate mistrust toward governing bodies. The study emphasizes that excluding local communities and neglecting their traditional ecological knowledge undermined both conservation effectiveness and livelihood resilience, as communities were impelled to violate regulations to sustain their livelihoods. To address these obstacles, Torri recommend for a paradigm shift from coercive conservation to participatory and co-management frameworks that acknowledge indigenous knowledge, actively draw in communities in decision-making, strengthen rehabilitation support, and integrate livelihood development with conservation objectives to accomplish more equitable and sustainable results.

Andrew J. Bamford, Daniella Ferrol-Schulte, and Jennifer Wathan (2014) explored human wildlife interactions within a Wildlife Management Area (WMA) adjoining to Tanzania’s Selous Game Reserve, using a combination of socio-economic surveys and ecological transect monitoring. The study finds a rapid annual population growth rate of 5%, with nearly one-third of residents being immigrants primarily captivated by the availability of fertile land rather than conservation incentives. The author recognizes that activities such as pastoralism, agriculture, burning, and hunting negatively affect several large mammal species, especially elephants and buffalo, whereas the presence of cattle notably diminishes wildlife indicators. Contrarily, some species, including duikers, reacted positively to burning, underscoring species-specific ecological dynamics. A serious governance shortcoming is revealed as there is limited awareness among local residents regarding the WMA’s objectives and the lack of tangible benefits for the local community, which collectively countermines the authenticity of conservation efforts. The authors insist to depart from uniform policy frameworks toward context-specific, case-by-case management strategies that

address demographic pressures, increase equitable benefit-sharing, and include adaptive ecological planning that is an approach essential for the effective governance of expanding buffer zones and relocation around tiger reserves in India.

Dhakal and Thapa (2015) looked closely at communities residing near the buffer zone of Chitwan National Park, revealing increased livelihood insecurity associated to wildlife-induced crop damage, food scarcity, and heavy dependency on forest resources and remittances. The results revealed that buffer zone management often fails to distribute conservation benefits equally, with the people most affected by human-wildlife conflict experiencing least involvement in the process of decision-making. This exclusion cultivates inequities, undermines support of community for conservation, and contributes to resource extraction that is illegal and economic susceptibility. To reduce these challenges and difficulties, the authors recommends for highly remunerated, voluntary displacement are appropriate, the promotion of substitute livelihoods and sustainable energy options for example biogas, equitable revenue-sharing mechanisms, and strengthen community participation in governance of buffer zone to harmonize local livelihood security with conservation objectives.

Krithi K. Karanth, Sahila Kudalkar, and Shivangi Jain (2018) delve into the idea of voluntary resettlement from protected area across several tiger reserves in India, pointing out that relocation decisions are guided by a complex interplay of livelihood, conflict, and development factors. Leveraging extensive household survey data, the research indicates that while most residents showed willingness to relocate, their reasons to relocate varied widely from seeking improved agricultural prospects and reduced human wildlife conflict to experiencing better access to healthcare, education, and infrastructure. The authors argue that the National Tiger Conservation Authority (NTCA) compensation framework is too overly standardized, noting its primary focus on land-based rehabilitation inadequately covering the diverse needs of households who are dependent on forest resources or wage labour. The study reveals that effective relocation requires transparency, voluntariness, and shared decision making, accompanied by long-term independent monitoring, diversified livelihood support, policy formulation that is gender-sensitive, and situation-specific rehabilitation strategies. If conducted with genuine consent and ethically, voluntary displacement can increase human well-being at the same time advancing wildlife conservation goals.

Indigenous Rights Advocacy Centre (2022) offers a rights-based analysis of India's tiger conservation framework, highlighting that the expansion of tiger reserves has predominantly followed a "people-free protected areas" approach, which inadequately influence indigenous communities. While recognizing conservation successes such as an increase in tiger reserves count from 9 in 1973 to 52 in 2022 and remarkable tiger population recovery the report highlights the displacement of 18,493 families from 215 villages. Additionally, over 41,000 families remain within tiger reserves, facing potential displacement. The report underline paradox wherein relocation intensified after the enactment of the Forest Rights Act (2006) and amendments to the Wildlife (Protection) Act, in spite of these laws mandating rights settlement and consent obtained after proper information sharing. It depicts coercive relocation practices, inadequate rehabilitation, treating tribal populations as offenders under the law, human rights violations, and structural failures in implementing Gram Sabha consent and Free, Prior, and Informed Consent (FPIC) requirements. Significantly, the case of Biligiri Rangaswamy Temple Tiger Reserve demonstrates that coexistence models can facilitate tiger population growth without the relocation of indigenous peoples. Overall the report concludes that ensuring constitutional compliance, proper and complete implementation of the Forest Rights Act, prohibition of forced relocations, transparency indecision-making, and investment in coexistence-based conservation strategies are critical to blend biodiversity protection with indigenous rights especially as core and buffer zones in India's tiger reserves continue to expand.

Menon (2022) provides an in depth analysis of conservation policies and forest governance that have resulted in dispossession and marginalization of the Van Gujjar pastoral community in Uttarakhand. The paper explains that eviction, resettlement, and the denial of customary grazing rights are regularly legitimized through legal frameworks and conservation laws, incorporating a fortress conservation model that excludes forest-dependent communities and disregard their ecological contributions. It further uncovers significant governance shortcomings, such as the selective law enforcement, inadequate implementation of the Forest Rights Act, and failure to admit traditional knowledge and livelihood practices. These dynamics have induced livelihood insecurity, cultural erosion, and intensified dependence on wage labour. The study argues relocation policies as repeatedly being carried out without sufficient scientific basis or true community consent. To reduce these issues, Menon suggest for participatory conservation

approaches, complete knowledge of community forest rights, effective implementation of the Forest Rights Act, and adopting coexistence-oriented conservation models that harmonize biodiversity preservation with livelihood sustainability and constitutional justice.

Datta et al. (2024) examine the increasing livelihood vulnerability of communities that depend mainly on the forest within the Buxa Tiger Reserve, implying this to conservation policies and environmental changes. Their research illustrates moderate to high vulnerability among most households who are driven by factors such as human-wildlife conflict, crop damage, inadequate infrastructure, and bounded adaptive capacity. The paper further depicts the ineffectiveness of initiatives by the government and institutional mechanisms-including Joint Forest Management Committees and self-help groups mainly due to poor enforcement and inadequate community engagement. Remarkably, households who showed greater willingness or capacity to relocate were having enhanced adaptive capacity, emphasising the structural challenges faced by the local residents in areas near tiger reserve. The authors propose for improved governance, more impactful welfare programs, livelihood support to the people living in this areas, and authentic participation of forest dwellers in decision-making procedures to prevent conservation efforts don't end up placing an unfair burden on local populations.

Suhas Chakma (2024) provides an overcritical review of India's Project Tiger, saying that expansion for conservation has resulted in widespread relocation and structural violence of constitutional and legislative rights for Scheduled Tribes and forest inhabitants. The study shows that around 5,50,000 people have been nominated for the displacement, with a massive 967% rise in displacement per Tiger Reserve in the post-2021 era. Alarmingly, relocation has happened even in reserves where there is zero tiger presence, questioning the logic of "inviolable area" laws. The report shows extensive noncompliance with the Forest Rights Act (FRA), the Wildlife Protection Act, and the Free, Prior, and Informed Consent (FPIC) provisions, as well as authenticated examples of forced evictions without prior consent, extrajudicial killings, false imprisonment, and refusal of basic services. Concurrently, commercial tourism and development projects have been approved in core areas, depicting a dichotomy in which tribal groups are excluded and restricted while tourists and infrastructure are welcomed. The research points out to adopt coexistence models like the Biligiri Rangaswamy Temple Tiger Reserve, undertaking new evaluations before displacement, and rigorously enforcing FPIC and rehabilitation protections. In the context of expanding core and buffer zones, the author identifies a fundamental governance dilemma in which conservation goals tends to take precedence over constitutional justice and rights of indigenous communities.

Hari Prasad Pandey, Armando Apan, and Tek Narayan Maraseni (2025) look into the ecological consequences of conservation-driven resettlement within Nepal's Terai Arc Landscape, focusing on Chitwan and Parsa National Parks. Their study shows that resettlement enabled significant expansion of protected areas (922.52 sq. km) and recovery of supported species, particularly boosting tiger populations alongside improvements in forest cover and ecological connectivity. However, these conservation achievements require considerable trade-offs. Resettlement sites, are often placed within biological corridors and buffer zones, experienced habitat fragmentation, agricultural encroachment, increased infrastructure development, and escalating human-wildlife conflicts. At first, people seemed genuinely hopeful there was a sense that forest regeneration might actually improve things. And for a while, maybe it did. But that optimism doesn't quite hold up over time. Gradually, concerns start creeping in bushfires becoming more frequent, signs of pollution, and a general feeling that the environment isn't as stable as it was supposed to be. The authors point towards a paradox wherein strict protection inside core zones increases biodiversity but simultaneously displaces ecological pressures onto adjacent landscapes, by that means compromising corridor integrity. They uphold for participatory governance models, corridor-focused landscape planning, implementation and enforcement of green infrastructure, forest management which is community-based, conflict preventative measures, and the incorporation of environmental justice principles into conservation policies. The findings emphasize that ecological wins lacking inclusive governance and comprehensive landscape level way of thinking undermining both biodiversity conservation and social equity goals in debates surrounding core and buffer zone expansions.

The Supreme Court Case *Wildlife First v Union of India* (Writ Petition No. 109/2008) underscore important government challenges in implementing the Forest Rights Act (FRA) 2006 in the context of tiger reserve expansions in India. The case questions the constitutionality of the FRA and its association with wildlife protection laws, focusing on the expulsion of forest dwellers who were rejected for their land claims without due process. Between February and September 2019, the Court issued multiple orders to stay on eviction actions, directing states to submit affidavits

detailing claim rejection procedures, and including the Forest Survey of India to assess unofficial forest occupation through satellite surveys. Despite the FRA's aim to recognize the rights of Scheduled Tribes and forest dwellers, the Court observed widespread non-compliance by states; this non-compliance encompassed insufficient procedural transparency, inadequate communication with claimants, and the absence of spatial data concerning rejected claims. Furthermore, the extended duration of the satellite survey and inconsistent state cooperation hindered effective enforcement. This legal inspection underscores the tension between constitutional justice and conservation objectives, showing governance gaps in balancing ecological protection with the rights of indigenous population and forest-dependent communities in the middle of expansion of core and buffer zones in tiger reserves.

The Ministry of Tribal Affairs (2025) indicates that village relocations from core and critical tiger habitats in India are conducted on a voluntary basis, as specified under Section 38V (5) of the Wildlife (Protection) Act, 1972, and Section 4(2) of the Forest Rights Act, 2006. According to the National Tiger Conservation Authority (NTCA), count of villages that have been voluntarily relocated from tiger reserves is 257, with no official records of involuntary or forced relocations. But in spite of that, Gram Sabhas and civil society organizations across multiple tiger reserves have argued ongoing concerns regarding evictions, emphasizing the legal requirement for Gram Sabha consent and rights settlement prior to displacement. Rehabilitation and relocation efforts are backed financially under the Centrally Sponsored Scheme "Project Tiger," although detailed state-wise compensation data is not available publicly. The Ministry promises adherence to principles of prior informed consent, voluntariness, and proper care in relocation processes, restating these standards to state governments and referencing NTCA guidelines that sustain voluntary relocation as the baseline.

CONCLUSION & POLICY SUGGESTIONS:

In this paper, the issues related to the expansion of the core and buffer areas in tiger reserves in India, in terms of their impact on conservation, relocation, and constitutional justice, have been discussed. It can be seen that this is a major problem in the country, which affects the balance between the need to conserve biodiversity on one hand, and the need to protect the rights of forest-dwelling communities on the other. It can also be seen that the current model of tiger reserve protection in the country, which is widely acknowledged to have succeeded in terms of ecological integrity, particularly in terms of tiger recovery, has also seen a lack of balance in terms of legal, social, and governance issues. Across case studies from Sariska, Kuno, Buxa, Uttarakhand, and comparative insights from Nepal and Tanzania, a consistent pattern emerges: strict protectionist approaches based on "inviolable" core areas frequently marginalize indigenous and forest-dwelling communities without adequately restoring their livelihood security. Even when framed as a choice, it is frequently embedded in asymmetrical power relations with restricted livelihood planning and procedural security.

The implementation gap in the Forest Rights Act, 2006, the lack of consent in the Gram Sabha, and the discrepancies highlighted in the arguments relating to the *Wildlife First v. Union of India* case are indicative of institutional failures in balancing the mandate of protection with the constitutional mandate. At the same time, the literature shows that human-nature interactions are not uniformly destructive. Traditional ecological knowledge, diversified agrarian systems, and community-based forest management have historically contributed to biodiversity maintenance in several landscapes. Evidence from coexistence models such as Biligiri Rangaswamy Temple Tiger Reserve suggests that conservation outcomes need not rely solely on displacement. Moreover, ecological research has shown that the emphasis on strict core protection can create spillover effects in buffer zones and corridors. This creates new vulnerabilities and conflicts. Thus, the central governance dilemma is not whether conservation or rights should prevail, but how to design institutional arrangements that integrate ecological science, livelihood security, and constitutional justice. The enlargement of the core and buffer zones of tiger reserves must therefore transition from a fortress conservation perspective to an adaptive, participatory, justice-oriented governance framework.

The review identifies a number of critical issues confronting the resettled communities. Some of the primary issues include the insecurity of livelihoods arising from reduced agricultural productivity because of the quality of the land and the lack of irrigation, violation of integrated farming systems, and the increased use of wage labor and remittances. There is also a problem with the rehabilitation process, which is standardized and reveals a marked dependency on compensatory measures based on the use of the land, combined with a lack of diversified and specific livelihood planning. There is also a problem with the long-term monitoring of the resettled

communities. There is a problem with governance, including the partial implementation of the Forest Rights Act, 2006, a lack of Free, Prior, and Informed Consent, a lack of transparency in the process of claim rejection and relocation, and a lack of Gram Sabha participation in the decision-making process. Communities also face human-wildlife conflicts and pressures on buffer zones, including crop damage, livestock depredation, and food insecurity, compounded by the externalization of ecological pressures from core forest areas to corridors and settlements. The current fortress conservation approach makes these problems worse because it assumes that people and wildlife cannot live together. It treats human presence inside forests as a threat to biodiversity. Consequently, the forest-dependent population has often been viewed as an encroaching population, a view that eventually leads to the criminalization of the population, social stigma, and exclusion from deliberations of conservation governance. The institutional weaknesses are also exemplified through the poor performance of Joint Forest Management Committees and welfare schemes, as well as the lack of any interdisciplinary ecological and socio-economic studies conducted before the relocation process.

However, various scholarly works have presented various transformative governance approaches that challenge the inevitability of displacement through the promotion of coexistence models as a means of achieving positive conservation outcomes. Corridor-focused landscape planning is identified as essential to prevent shifts in ecological pressure. Furthermore, the principle of voluntariness in relocation should be procedurally verifiable rather than administratively assumed. Lastly, conservation governance has to be placed within constitutional justice frameworks, which ensure that community rights are respected as an integral, and not subsidiary, part of conservation imperatives.

The policy recommendations from this review call for addressing governance issues through a comprehensive and context-aware strategy. First, it is essential to make sure there is full compliance with constitutional and legal provisions by adhering to the Forest Rights Act (2006) prior to declaring critical tiger habitats, along with compulsory independent verification of Gram Sabha consent procedures. Transparency can be improved by creating a publicly accessible digital database that records relocation decisions, compensation details, and claim statuses, supported by institutionalized third-party legal and social audits for any tiger reserve expansions.

Second, the displacement framework needs redesigning to step beyond standardized compensation models toward context-specific rehabilitation packages that adapt to diverse livelihood profiles, including agrarian, pastoral, forest produce dependent, and wage labour communities. This covers guaranteeing essential resources such as irrigation, soil improvement, restoration of livestock, and access to the market at relocated sites. Long term multi layered livelihood transition grants should replace one-time compensation, and independent post-displacement monitoring at least for 5-10-year period must be mandated to evaluate socio-economic outcomes successfully.

Third, participatory and co-management models should be standardized by involving Gram Sabhas into buffer zone management committees with statutory decision-making authority, perceiving and incorporating traditional ecological knowledge into planning for conservation. Piloting community-conserved areas within buffer zones can foster shared stewardship and empower local populations.

Fourth, to shift from reserve-centric to landscape-level and corridor-centric ecological planning is important. This includes protecting ecological corridors through green infrastructure planning and regulated development while conducting progressive ecological impact assessments prior to any expansions in core areas.

Fifth, forward thinking measures to solve human-wildlife conflict is essential, that includes implementing real-time remuneration systems for loss of crop and livestock, expansion of insurance-based models for wildlife related damages, and actively promoting alternative energy solutions such as biogas and solar fencing to reduce forest dependency.

Sixth, institutional transparency and accountability must be strong enough, which can be done by annually publishing state-wise data on compensation and relocation, setting up an independent national-level Conservation and Rights Oversight Authority, and mandating interdisciplinary review panels that include ecologists, social scientists, and legal scholars prior to approving displacement proposals.

Finally, government should promote coexistence-based models that helps in scaling up successful examples like the Biligiri Rangaswamy Temple Tiger Reserve. Appreciating community forest rights as conservation assets rather than obstacles and motivating incentive-based conservation

mechanisms such as payments for ecosystem services and eco-tourism revenue sharing can coordinate ecological objectives with well-being of the community.

Hence the expansion of core and buffer zones in India's tiger reserves is both a conservation and constitutional governance challenge. On paper, the goal is straightforward: protect biodiversity. But in practice, it quickly runs into issues of rights, livelihoods, and how decisions are actually made. If conservation is meant to last, it probably can't rely on the old exclusionary model alone. There's a growing sense that it needs to shift toward something more grounded in rights, more participatory, and, ideally, guided by evidence rather than assumption. That means thinking not just about protecting tigers, but also about how people living around these landscapes sustain themselves.

In the end, it's less about choosing one over the other and more about holding both together. Bringing ecological science into conversation with democratic processes and social equity isn't easy, there are trade-offs, and not all of them are comfortable but it does seem necessary if conservation is to be both effective and fair.

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