

Submission for the Call for Input for the Study on ‘the rights of Indigenous Peoples in conflict and post-conflict situations’

Submitted by

International Solidarity for Academic Freedom in India (InSAF India)

InSAF India is an Indian diaspora led collective of anti-caste academics and scholars focusing on civil and political rights in India.

Indian Alliance Paris

Indian Alliance Paris is an organization of diasporic Indians and their French colleagues striving for a democratic and inclusive India.

International Work Group for Indigenous Affairs (IWGIA)

Since 1968 IWGIA has cooperated with Indigenous organisations and international institutions to promote the recognition and implementation of the rights of Indigenous Peoples. IWGIA promotes and defends Indigenous Peoples’ rights through documentation, supporting empowerment and advocacy.

Asia Indigenous Peoples Pact

The Asia Indigenous Peoples Pact (AIPP) is a regional organization committed to promoting and defending Indigenous Peoples’ rights and human rights, and to articulating issues of relevance to Indigenous Peoples.

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(This report is 5 pages long.)

**Developmental Violence as Mechanism for Erasure of the
Rights of Indigenous Adivasi Peoples in Bastar, Chhattisgarh, India:
Repression of Youth-Led Justice-Based Peacebuilding Efforts**

This joint submission by International Solidarity for Academic Freedom in India, Indian Alliance Paris, Asia Indigenous Peoples Pact and International Work Group for Indigenous Affairs is in pursuance of informing the EMRIP's report on the Rights of Indigenous Peoples' in Conflict and Post-Conflict Situations, to be presented to the Human Rights Council at its sixty-third session in September 2026. The submission draws upon state reports, investigative reportage by local journalists, civil society fact-finding missions, and consultation with activists and legal workers in the region.

There is a long and distinctive history of India's Indigenous Adivasi peoples'¹ resistance movements to protect their stewardship of *jal, jangal, jameen* [waters, forests, lands] and sustainable livelihoods from rapacious deforestation, displacement and industrialization in the name of 'development'. The associated rights of Indigenous Peoples/Adivasis (meaning 'first inhabitants') to their lands, natural resources and customary practices are safeguarded in the provisions of the Fifth Schedule of the Indian Constitution.² This submission details the specific and prolonged *form* of state intervention – 'developmental violence'³ – used by the Indian state to suppress the Adivasi/Indigenous Peoples' efforts to assert their identity, autonomy and rights to land and resources through justice-based peacebuilding efforts,⁴ in particular in the Bastar Division in the state of Chhattisgarh, where a conflict situation has impacted the lives of the Adivasi/Indigenous Peoples ever since the state's formation in 2000. The aims of this approach are territorial control and resource appropriation, a policy described as 'clear, build, hold' by the Indian government.⁵

Section 1: Blurring the Boundaries of Conflict and Post-Conflict in Bastar

Following on from the British colonial regime to the neoliberal paradigm adopted in the early 1990s, successive governments have increasingly permitted corporate interests to dominate India's economic and development policies. Under the pretext of development, the state and extractive industries have been forcibly acquiring Adivasi/Indigenous Peoples' lands, leading to large-scale dispossession and displacement. In the face of the Adivasi/Indigenous Peoples' resistance to this landgrab, India has invoked the discourse of 'internal security threat' against them.⁶ The discourse focuses on the armed Naxalite movement that has resisted the entry of mining and other industries in Adivasi regions,⁷ in particular in the Bastar Division, as the cause of lack of peace and development in the region. Intensive state militarization and the recent 'deadline'-led approach for 'extermination' of armed insurgency is presented as the only definitive solution.⁸ The result of this discourse, however, is the targeting of the Adivasi/Indigenous communities as a whole for facilitating the entry of corporate interests in the region. This includes isolating the Naxalite movement and drying up the support for it as well as suppressing all other Indigenous resistance movements while more mining sites are opened up in the region. That is, the Indian State is 'securing' the development of Bastar as a consolidated, permanent counter-insurgency grid that redefines Adivasi/Indigenous Peoples' territories as a zone of exception to be administered not through civilian institutions but through force – hereafter referred to as 'developmental violence'.⁹ The nearly five-decade long Naxalite-led armed struggle and alternative governance, however, is one face of Adivasi/Indigenous Peoples' resistance to the state's developmental violence. More recently, the region's Adivasi/Indigenous youth began rights-based organizing/mass mobilizations and legal action as a method of 'justice-based peacebuilding'.¹⁰

The 2005 state-backed vigilante operation Salwa Judum (literally meaning 'Purification Hunt' in Gondi language), set the template of developmental violence as the mechanism for collective punishment of Adivasi/Indigenous communities, with destruction of entire villages, mass displacement with thousands forced to live in camps under prison-like conditions (strategic hamletting), summary executions and sexual violence.¹¹ While the Supreme Court of India declared Salwa Judum unconstitutional in 2011, many of the vigilante forces were appointed as 'special police officers' (SPOs). Later, they were constituted into special

counter-insurgency formations such as the District Reserve Guard (DRG), as part of an evolving permanent infrastructure of occupation and conflict across Bastar. In the past two years, the Indian State has sharply escalated its developmental violence, with its security forces,¹² legal apparatus and administrative arms acting in concert to suppress and increasingly attempting to extinguish the Adivasi/Indigenous Peoples' movements in several ways:

- **Establishment of a security camp grid in Adivasi/Indigenous Peoples' territories without FPIC** to (1) embed security forces more deeply and permanently in Adivasi areas and constrict Indigenous life; and (2) carry out counter-insurgency operations, resulting in extrajudicial killings by security personnel who get monetary rewards for killing both combatants and ordinary villagers, arbitrary detentions, mass disappearances and forced surrenders (see **Annexure** for a detailed account of the rewards-for-killing policy and a 985% increase in the number of people killed between 2023 and 2024; and example incidents of all the violations noted here), as well as aerial and mortar bombardments.¹³ These actions violate UNDRIP Articles 4, 7, 10, 18, 19, 25, 29, 30 and 32. The destruction of Adivasi/Indigenous Peoples' sacred groves and burial grounds for building the security camps, and the restriction of access to sacred sites (and grazing pastures) by mining companies fencing off lands acquired without FPIC, violate Articles 25–29 and 32, which recognize Indigenous Peoples' rights to maintain spiritual relationships with their lands, and protect and conserve resources.¹⁴
- **Deliberate creation of internal divisions and distrust within Adivasi/Indigenous Peoples' communities.** People from the same families/communities have joined the Naxalites or the security forces. The surrender policy for insurgents refers to 'reintegration' into the 'mainstream', but high unemployment, few job opportunities and diminishing agricultural work means many surrendered Naxalites rearm by joining the DRG.¹⁵ These actions violate UNDRIP Articles 4, 41 and 42.
- **Criminalization of Adivasi/Indigenous Peoples' youth-led mass movements and political participation** with arbitrary detention of Indigenous Peoples' human rights defenders (HRDs) including women HRDs under repressive legislation to silence dissenting voices. These actions violate UNDRIP Articles 4, 18, 19. This point is elaborated on in Section 3.
- **Abrogation of command responsibility with state actors functioning under full impunity.** As detailed in Section 4, all domestic avenues of redress have closed their doors to the Adivasi/Indigenous Peoples' communities: the judiciary remains deferential to State narratives (see Section 2), while the National Human Rights Commission (NHRC) largely accepts the police's account of violence committed, without any independent inquiry (see Section 4). These due diligence failures violate UNDRIP Articles 28, 37, 40, 41, and 42.
- **Gaining public consent** for all the above through the uncritical reproduction of police statements in mainstream media, which normalizes the violence and reduces Bastar's lived realities of socio-economic deprivation and loss of traditional Adivasi/Indigenous Peoples' economic practices to a 'security problem' of 'Left-Wing Extremism' in the national consciousness.¹⁶

In this context, in violation of UNDRIP Articles 3, 4, 30, 41 and 42, as detailed below, there is no forum within India where Adivasi/Indigenous' Peoples can seek justice, protection or accountability, and the boundaries between military command ('conflict') and civil administration ('post-conflict') have effectively vanished.

Section 2: Corporate–Military Convergence in Developmental Violence: Violation of FPIC and Geopolitical Influences

India's constitutional obligations towards Indigenous land rights are enmeshed within a legal framework comprising several laws, executive instruments, and judicial pronouncements that together govern land, forests, mines and minerals, and the environment. Specific laws, such as the *Provisions of the Panchayats*

(Extension to Scheduled Areas) Act 1996 (PESA) and the *Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006 (FRA)*, recognize the autonomy and right to FPIC of Indigenous Peoples – described therein as Scheduled Tribes (STs) and Other Traditional Forest Dwellers (OTFDs) – but which are either not implemented or frequently violated.¹⁷ This situation, along with India’s declaration that *all* Indians are ‘indigenous’ (see Note 1) enables the state to contravene UNDRIP Articles 3, 4, 41, and 42 with regards to centring Indigenous participation in developmental mechanisms that impact on their governance and political and administrative systems.

Since joining the global markets in the 1990s, India has also been presenting its natural resources as a vital source of national revenue, as public assets are privatized and state income falls. Chhattisgarh has over 28 known minerals and critical minerals like lithium and graphite, with applications including batteries, electronics, superconductors and aerospace industries. In 2024–2025, its mineral production (13.6%) ranked third amongst all Indian states. India has also joined the problematic ‘just transition’ approach to justify extracting critical minerals. For instance, in July 2023, without consulting its Adivasi/Indigenous peoples and in violation of UNDRIP Articles 30, 41 and 42, India amended its mining regulations to permit private companies to bid for critical mineral exploration licences.¹⁸

Within this broader context, the escalation of militarization since January 2024 has occurred in parallel with the acceleration of extractive and ‘developmental’ projects across Indigenous territories. In March 2025, ArcelorMittal became the first multinational corporation to enter Bastar,¹⁹ revealing the political economy that sustains the violence: the conversion of Indigenous land without FPIC into zones of profit under the protection of security forces, violating UNDRIP Articles 10, 18, 19, and 30. Development projects, highways, railways, and large-scale mining operations, are advancing in the shadow of the security camps,²⁰ their routes almost overlapping with the mineral belts identified by the Ministry of Mines. The language of national ‘security’ blurs in with climate change and energy transition to ensure uninterrupted extraction through the elimination of Indigenous land rights.

Section 3: Bastar’s Youth at the Forefront of Justice-based Peacebuilding, and the Proscription of Moolwasi Bachao Manch

Recently, a powerful, innovative attempt by Adivasi/Indigenous youth at justice-based peacebuilding emerged in the region. This peacebuilding method was rooted in ending conflict in the region, with participatory parity and the recognition of Adivasi/Indigenous Peoples’ rights on their land, natural resources, lives, and livelihoods, and accountability for the violence and repression faced by them, as enshrined in UNDRIP Articles 3, 4, 7, 10, 18, 19, 41 and 42.

In May 2021, four people were killed during police firing on a peaceful sit-in protest by villagers against a security camp set up in Silger, south Bastar, without consent. As the protest continued, a decentralized, grassroots collective of Adivasi/Indigenous villagers and community representatives formed and soon evolved into a youth-led platform, Moolwasi Bachao Manch ([Save the Indigenous Peoples’ Movement]; ‘MBM’).²¹ Membership was organic, emerging from protest sites. Young Adivasi/Indigenous men and women participated jointly at the protest sites and in organizational roles. Registers of office-bearers and regular members were maintained locally. Many of MBM’s leaders grew up surrounded by the conflict of the Salwa Judum, with families directly impacted by killings and imprisonment, burning of villages, displacement, and sexual violence.²² The movements advocated against all developmental violence, including built infrastructure that did not benefit villagers; industrial and mining activities leading to deforestation and degradation of Bastar’s fragile forest ecosystems and critical biodiversity; the everyday intimidation and violence against women; and the extrajudicial killings, enforced disappearances, custodial torture and incarceration on false criminal charges. They articulated an alternative development model rooted in Indigenous stewardship of lands and natural resources and ecological sustainability, sustainable livelihoods and democratic participation, and aligned with international principles of just transitions to climate-resilient futures. They demanded respect for Indigenous land rights, establishment of public health

and education at village level, accessible sources of clean drinking water and energy, and participatory parity in the region's civil administration.²³

This rights-based organizing and mobilizing was soon cast as threats to the State–corporate agenda. To dismantle the movement, State authorities repeatedly humiliated, intimidated, surveilled, arrested and imprisoned many Adivasi/Indigenous youth activists (around 40 since 2022) under sweeping ‘terrorism’ charges.²⁴ Finally, Chhattisgarh Government, on 30 October 2024, declared MBM an ‘unlawful organization’ under the *Chhattisgarh Special Public Security Act, 2005* (CSPSA), framing its justice-based peacebuilding as ‘instigation of the general public’ against the state’s ‘vision of development’. MBM had to dissolve, and all its protests site opened since 2021, some ongoing as long as two to three years, were dismantled.²⁵ The affected community pursued every available domestic remedy, representation to the Government, petition to the High Court, and appeal before the Supreme Court, but failing to be heard at every step.²⁶ Although the ban officially lasted a year, it *de facto* remains in place. MBM’s ex-President Raghu Midiyami, ex-Vice President and WHRD Suneeta Pottam, and ex-General Secretary Gajendra Mandavi remain incarcerated with their colleagues.²⁷ Multiple false cases and serial re-arrests are preventing release, with the National Investigation Agency (NIA) attempting to round up remaining organizers. Clearly, and in contravention of UNDRIP Articles 4, 18 and 19, the deprivation of liberty of MBM members is intended to disable the justice-based peacebuilding methods being developed by politically conscious Indigenous youth.

Section 4: Failure of Legal/Judicial Processes for Conflict Resolution and Post-Conflict Possibilities of Justice-Based Peace in Bastar

In their struggle to maintain their autonomy and the right to local self-governance of their *jal, jangal* and *jameen*, the Adivasis/Indigenous Peoples have attempted to engage in good-faith negotiations with the Indian State ever since India achieved independence in 1947. However, the State has never seriously engaged in the idea of justice-based peace.²⁸ Rather, the criminal justice system – from investigation to adjudication – functions as an extension of the counterinsurgency apparatus with no accountability attached to acts of violence committed by the State. Accordingly, the National Human Rights Council (NHRC), the public forum for seeking protection, lacks the institutional independence and enforcement powers necessary to operate in highly securitized/militarized environments.

In nearly every alleged killing of an insurgent or villager, the First Information Report (FIR) is filed *against the deceased* rather than the perpetrators. The victim is labelled a ‘Naxalite’, and the security forces’ claim of ‘self-defence’ is accepted. This presumption of guilt precludes impartial inquiry and legally forecloses the possibility of an independent investigation. Many killings are simply listed as ‘unknown Naxalite’ in the NHRC database or may not even be reported as per the law.²⁹ Bodies of victims are frequently returned in plastic bags, half-dressed, or with unstitched post-mortem incisions, or not kept under the appropriate conditions so that they start to decompose,³⁰ symbolizing no regard for the dead or the dignity of their communities. Under NHRC guidelines and Section 176 of the Code of Criminal Procedure, every killing by the State must be independently investigated within 48 hours. In practice, inquiries are perfunctory and rely exclusively on the reports of the same security forces or state police involved in the killings. Families seeking justice often face threats of violence, surveillance and humiliation, and are also routinely denied the right to file counter-complaints because the existence of the prior case (against the deceased) allows the state pretext for refusal.³¹ Testimonies of eyewitnesses, including entire villages, are dismissed as ‘biased’ or ‘influenced by Maoist propaganda’.³² Such procedural inversions effectively converts every killing into a ‘lawful execution’. When the NHRC has acknowledged extrajudicial executions, its response has been limited to token recommendations for compensation.

Due to courage and persistent efforts of Adivasi/Indigenous women, over 99 rapes were reported during the Salwa Judum. No case, however, has been registered against police personnel. The same holds for all cases of state-inflicted sexual violence in the years since, including the rare instance in which the NHRC and the

National Commission for Schedule Tribes (NCST) confirmed that sexual violence occurred. Survivors continue to live under surveillance and fear, while the accused continue in service.³³

To date, there has also been no investigation/prosecution in relation to the intimidation of HRDs working in Bastar, including those who have sought protection from the NHRC. HRDs seeking judicial redress for Adivasi/Indigenous Peoples' human rights violations, including extrajudicial killings and custodial torture, have been reprimanded or treated with suspicion by the judiciary.³⁴ The tactic of re-arresting in new cases just as people become eligible for release is commonly used to keep Adivasi/Indigenous Peoples' HRDs in jail without trial.³⁵ Apart from HRDs, thousands of Adivasis/Indigenous persons have been detained on manifestly fabricated charges of being 'Naxalites; and of participating in serious offences such as rioting, murder, unlawful assembly, and the use of arms and explosives. Routine 'area domination exercises' and 'search operations' conducted by security forces frequently result in mass arrests from weekly markets, villages, and forest paths, often without warrants, independent witnesses, or any credible evidence. Bail is routinely denied as a matter of course under a sweeping and ill-defined pretext of 'national security'. Petitions seeking discharge, quashing of proceedings, or even urgent medical relief are regularly dismissed without reasoned judicial orders, in clear violation of basic principles of due process. Trials frequently extend over several years; yet, in the overwhelming majority of cases, proceedings ultimately culminate in acquittal due to the prosecution's complete failure to establish guilt.³⁶

Conclusion and Recommendations

This submission has shown how India is consistently in violation of various articles of UNDRIP. From the intermeshing of Constitutional obligations and an extensive legal framework for Indigenous rights (see Note 17) with conflicting forest, mines and minerals legislations to criminalizing Adivasi/Indigenous youth's justice-based peace-building movements and assertion of Indigenous identity, India is violating Articles 3, 4, 41 and 42, according to which Indigenous Peoples must be directly involved in shaping their governance and their political and administrative systems and that Indigenous Peoples' rights and demands are at the core of negotiations, peacebuilding processes and any developmental mechanisms. The escalated militarization of Bastar with weaponization of public services in rural Bastar violate Articles 7 and 30, as these negate the right of the Adivasi/Indigenous Peoples to live in peace and assert their collective right to life, liberty and security. By forcibly acquiring their lands and criminalizing Adivasi dissent against these state actions, the Indian State is contravening Articles 10, 18, and 19, which state that Indigenous Peoples cannot be forcibly displaced from their lands and their full and effective participation is a must in all decision-making processes affecting them, and that FPIC must be followed before adopting measures impacting Indigenous Peoples' rights.

The submitting organizations respectfully urge EMRIP and all relevant UN mechanisms to urge the Government of India to: end militarization of Bastar with withdrawal of security forces and removal of security camps; allow international monitors to access the region, including the UN Special Rapporteur for Indigenous Peoples' Rights, UNHRC, and Indigenous Peoples' and human rights organizations; release all Adivasi/Indigenous Peoples' prisoners and withdraw cases against Adivasi/Indigenous Peoples' HRDs and activists; conduct an independent and impartial inquiry into all acts of violence, including extrajudicial killings, sexual violence, drone bombings, arbitrary detentions, arrests and disappearances, ensuring accountability of perpetrators of violence and just compensation for victims; and establish robust open consultative processes recognizing and respecting Adivasi/Indigenous Peoples' rights on their lands and resources. Until this time, the government should declare a moratorium on auctions and permissions for and initiation of mining and other industrial activities in Adivasi/Indigenous Peoples' areas.

ANNEXURE

For the joint submission by International Solidarity for Academic Freedom in India, Indian Alliance Paris, Asia Indigenous Peoples Pact and International Work Group for Indigenous Affairs, in pursuance of informing the EMRIP’s report on the Rights of Indigenous Peoples’ in Conflict and Post-Conflict Situations, to be presented to the Human Rights Council at its sixty-third session in September 2026.

The rewards-for-killing policy

While Chhattisgarh Police and the security forces have been operating under a reward-for-killing mechanism,³⁷ this was formally codified through Chhattisgarh state’s revised Surrender and Rehabilitation Policy in March 2025. By offering financial payments for every person ‘captured (dead or alive), the state has created a incentivizing policy for committing extrajudicial actions.

The reward declarations in most cases are assigned after deaths occur. The absence of a public registry of wanted persons or transparent verification procedure allows anyone killed to be retroactively labelled as a ‘Naxalite’ and announced as a quantifiable ‘success’. Official press releases openly publicize the monetary ‘value’ of operations – INR 3.33 crore [33.3 million], INR 5.25 crore [52.5 million], etc.³⁸

As per policy, arrests also invite incentives. However, the government’s own data show that since early 2024 the ratio of killings to arrests markedly escalated.³⁹ In October 2025, an analysis was conducted by the Campaign for Peace and Justice in Chhattisgarh (CPJC) of official figures for 2020–2024 for the Bastar Division from the *Bastar Police Action and Outcome Report (2024–2025)*. Key points from the analysis are given below.

Year	Deaths	Arrests	Surrenders	Total	Deaths %	Arrests %	Surrenders %
2020	40	438	342	820	4.9 %	53.4 %	41.7 %
2021	51	494	551	1,096	4.7 %	45.1 %	50.3 %
2022	30	291	415	736	4.1 %	39.5 %	56.4 %
2023	20	387	398	805	2.5 %	48.1 %	49.4 %
2024	217	925	792	1,934	11.2 %	47.8 %	41.0 %

- Killings rose from a total of 141 in 2020–2023 to 217 in 2024.
- The ratio of killings to arrests collapsed from 1:19 (2023) to 1:4 (2024), a clear indicator of a shift from capture to elimination.
- The proportion of killings among all recorded outcomes (deaths + arrests + surrenders) increased from 2.5% to 11.2%. In 2023, for every person killed, there were around 40 arrests or surrenders. In 2024, that ratio dropped to 8.

Year	No. of Encounters	No. of Alleged Naxalites Killed	Average Killed per Encounter
2023	68	20	0.29
2024	121	217	1.79
% Increase	+78%	+985%	+517%

- While the number of reported incidents of exchanges of fire between security forces and alleged Naxalites nearly doubled between 2023 (68) and 2024 (121), the number of deaths in those encounters increased tenfold, from 20 to 217.

These figures clearly demonstrate a sharp intensification of State violence since early 2024. Besides killings, mass illegal detentions and coercive surrenders are also reported. In many instances of the killings, villagers and family have said people are taken alive, tortured, and later staged as Naxalites. Some incidents are listed below.

1 January 2024: On 1 January 2024, six-month-old Mangli Sodi was killed in Mutvendi village during what police claimed was ‘crossfire’ between Naxalites and security forces. Her mother Maase sustained a bullet injury. The police stated compensation of INR70,000 had been deposited in Maase’s account. The villagers refuted the police’s claims, asserting that no Naxalites were present and alleging indiscriminate firing by security forces. Maase was coerced into signing documents that offered a compensation. The police also forcibly buried Mangli without allowing customary rituals, violating the family’s cultural and religious practices.⁴⁰

20 January 2024: The police claimed killing two female and one male Naxalite on 20 January 2024, near Belam Nendra and Belam Gutta villages in Bijapur district and recovering significant munitions and weapons. But the villagers rejected this account, and said security forces opened fire on a group of Adivasi villagers traveling to Gorna village to join a protest against the killing of six-month-old Mangli Sodi. Two teenage girls and a man were killed. Survivors, including 12-year-old Jimme Uika and 10-year-old Chhotu Podiam, refuted police claims that the deceased were Naxalites, asserting no Naxalites were present. The survivors were also captured, tied and beaten by security forces.⁴¹

27 March 2024: According to the police, six Naxalites were killed in an encounter near the Chipurbhatti forest in Bijapur, including two women. According to the Naxalites, two of the deceased were their activists but the others killed were not Naxalites but villagers. Photographic evidence also showed least one victim tied and alive prior to being shot, indicating this was an extrajudicial killing.⁴²

31 March 2025: According to the police, Renuka, a Naxalite leader, was killed in an ‘exchange of fire’ near Indravati river in the hills around Nelgoda, Ikeli, and Belnar villages on the border of Dantewada and Bijapur districts. A reward of INR2,500,000 was declared on her. According to the family, her hands were mutilated, indicating torture prior to death, and the police would not share the post-mortem report with them. Renuka had been in poor health and had been living in Belnar village in Bhairamgarh block of Bijapur District. On 31 March, the police came in the early hours of the morning and she was interrogated for several hours before being taken and killed near the river.⁴³

2 April 2024: The body of 17-year-old Kamli Kunjam in Naxalite uniform, was among 13 bodies claimed by the police to be Naxalites killed in an encounter near Korcholi and Nendra villages. Villagers reported that the deaf and mute teenager with learning disabilities was forcibly taken from her home. Her bangle was later found in the forest with evidence of a person being dragged, raising likelihood of sexual violence before her death.⁴⁴

10 May 2024: During a police firing on villagers from Pidiya and Itawa, Bijapur District, collecting forest produce, 10 of the 12 killed were civilians. Others were injured and many villagers were detained, forced to lift the bodies, and then held hostage in Bijapur. Families attempting to file complaints, accompanied by human rights defender Bela Bhatia, were denied access to the police station. Later, while most of those detained were released, some were falsely recorded as ‘arrested Naxalites’.⁴⁵

8 November 2024: According to the police, three Naxalites were killed in an ‘exchange of fire’ near the Rekhapalli-Komathpalli area of Bijapur District. One Naxalite killed was identified in a police report released on 9 November 2024 and a reward of INR800,000 stated against his name while the other two were not identified. According to the villagers, security forces encircled about nine villages in Bijapur District, including Rekhapilli, in a sweeping operation in which over 40 individuals from five villages were forcibly rounded up and detained. Two youth were also killed after being pulled out of their homes by the security forces, in indiscriminate acts of firing. In addition, eight members of Moolwasi Bachao Manch were also detained in Gundiraguda village.⁴⁶

11–12 December 2024: The police claimed that they killed seven Naxalites in an ‘exchange of fire’ in the Abujhmad forest near Kummam and Lekawada villages in Narayanpur district of Bastar on 11 December 2024. One of them, Karthik, had a reward of INR2.5 million announced. According to reports, the police

made no mention of any children in the area being injured or killed. Later a journalist investigation revealed eight people had been killed, and as per the villagers this included three minors. Four children were also injured. On 17 December 2024, police claimed that at least four civilians sustained bullet injuries because the Naxalites had used villagers, including the children, as human shields. An infant, Rainu, whose father was killed, was abducted by the police and abandoned in the next village where he was found by his mother three days later.⁴⁷

1 February 2025: According to the police, an ‘exchange of fire’ took place in the Gangaloor area of Bijapur District. They recovered the bodies of eight armed Naxalites killed, with possibility of more deaths. Later, the villagers stated that a staged encounter had happened in Korcholi and Todka villages. As per the people, the police entered the villages, storming inside homes, early in the morning on 1 February. Many villager fled into the forests of Todi Hills, from where gunshots were heard after a few hours. Eight of several people detained by the police were still in custody on 3 February.⁴⁸

5–7 July 2025: According to the police, seven Naxalites were killed in an encounter in Indravati National Park in Bijapur district during an operation over days. However, according to the villagers, one of those killed was a government school cook, Mahesh Kudiya, from Irragutta village.⁴⁹

14 August 2025: According to the police a village youth, Abhay Netam, sustained a bullet injury during cross-firing between Naxalites and the police in the Neljhar forests near Kokameta village in Kondagaon district, an area previously declared ‘Naxal-free’ by the government. Netam alleged that he had gone to the forest with three other youth for bird hunting. The police damaged their motorcycle and as the youth were dragging it back, they caught three of them and opened fire. As Netam pleaded with them to stop, he was hit by a bullet himself.⁵⁰

It has also been reported that detainees may reappear weeks or months later as ‘surrendered Naxalites’ in the State’s ‘rehabilitation and skill-training programme’. The detainees, many of them ordinary Adivasi villagers, are often showcased as reformed Naxalites in public surrender ceremonies. At one centre in Bijapur district, 200–250 individuals, including 60–70 women and children as young as 14, were found to be held without charge or trial. Detainees are compelled to perform menial labour – cleaning, cooking, and maintenance – rather than receiving any genuine training. Women reported sexual harassment and coercion by security personnel.⁵¹

¹ Although India is a signatory to International Labour Organization (ILO) Convention 107, and the UN Declaration on the Rights of Indigenous Peoples, domestically it does not recognize the specific category of ‘Indigenous Peoples’. In official parlance, the term ‘Scheduled Tribes’ is used to identify India’s Indigenous Peoples based on historical, cultural and socio-economic factors. However, the criteria used are still derived from contested anthropological descriptions of these communities as ‘backward’ and ‘uncivilized’ people (as outlined in the 1965 Lokur Committee Report (<https://socialjustice.gov.in/public/ckeditor/upload/11301676262859.pdf>)). For the historical context, see Sharma, B.D. *Unbroken History of Broken Promises. The Indian State and the Tribal People*. New Delhi: Freedom Press, 2010; Sundar N. *Subalterns and Sovereigns: An Anthropological History of Bastar, 1854-2006*. Oxford University Press, 2008.

² The Fifth Schedule of the Constitution of India contains special provisions for the administration and control of ‘Scheduled Areas’, or those areas with a high concentration of Indigenous populations, with the objective of protecting the autonomy and culture of the Indigenous Peoples. Historically, the Adivasi/Indigenous peoples have always resisted the efforts of the dominant state, both prior to and after 1947, to erase their identities, cultures and customary laws. The British therefore designated Adivasi/Indigenous Peoples’ areas as special legal zones termed as ‘Scheduled Tracts’, ‘Scheduled Districts’, ‘Partially Restricted Tracts’ or ‘Backward Tracts’ in response to various Adivasi/Indigenous Peoples’ revolts during that period. After 1947, Adivasi/Indigenous Peoples’ representatives in the Constituent Assembly, as well as civil society groups, advocated for ensuring that these areas retained their special legal and land rights. This was done through inclusion in provisions of the Fifth Schedule under Article 244 of the Constitution, wherein ‘Fifth Schedule Areas’ (FSAs) are designated as areas with a significant Indigenous population and exist in ten states: Andhra Pradesh, Chhattisgarh, Gujarat, Himachal Pradesh, Jharkhand, Madhya Pradesh, Maharashtra, Odisha, Rajasthan and Telangana. (Sundar, N. ‘We will teach India democracy’: Indigenous voices in Constitution making. *Journal of Imperial and Commonwealth History* 2024, 52, pp.181–213

(<https://www.tandfonline.com/doi/abs/10.1080/03086534.2023.2196838>); Human Rights Lawyering Clinic, National Law School of India University. *Human Rights and Environmental Implications of the Proposed Sijimali Bauxite Mine in Odisha*. HRLC, 2024 (<https://www.nls.ac.in/wp-content/uploads/2024/04/Under-the-Surface-Human-Rights-and-Environmental-Implications-of-the-Proposed-Sijimali-Bauxite-Mine-in-Odisha.pdf>).

³ Development as a good standard of living in India is commonly understood as benevolent state actions bringing ‘good’ for (most) people, such as roads, schools and health services. However, because the State’s understanding of development entails land acquisition, displacement and dispossession, for the marginalized Adivasi/Indigenous communities, development has played out as ‘developmental violence’. This has mostly been enforced by actual violence, entailing massacres, disappearances, arrests and imprisonment, and sexual violence disproportionately affecting Adivasi/Indigenous communities. In the absence of official documentation, which is acknowledged by the National Human Rights Commission, civil society and academic research estimates that ~70 million Indians have been displaced by industrial/mining projects between 1947 and 2010, of whom nearly half (~47%) are Adivasi/Indigenous Peoples who form 8.6% of India’s population (from International Solidarity for Academic Freedom in India and Indian Alliance Paris. *Developmental Violence: The Persistent Denial of Justice-Based Peace for the Indigenous Adivasi Peoples of Bastar Division, Chhattisgarh State, India*. 21 November 2025. Joint submission in response to the call for inputs to the Independent Expert’s Report on Peace and International Solidarity, to be presented to the 62nd session of the UN Human Rights Council in June 2026 (<https://www.academicfreedomindia.com/post/developmental-violence-the-persistent-denial-of-justice-based-peace-for-the-indigenous-ativasi-peoples-of-bastar-division-chhattisgarh-state-india>)). See also Fernandes, W. *The Poor Pay the Price: Development Induced Displacement*. Council for Social Development, 2021; Ministry for Tribal Affairs, Government of India. *Report of the High Level Committee on Socioeconomic, Health and Educational Status of Tribal Communities of India*, Ministry for Tribal Affairs, 2014 (<https://cjp.org.in/wp-content/uploads/2019/10/2014-Xaxa-Tribal-Committee-Report.pdf>).

⁴ Such justice includes social, economic, cultural and political justice: accountability of the people instrumental in the developmental violence as well as just distribution of the resources that Adivasi/Indigenous Peoples are deprived of while the country’s elite enjoys the fruits of ‘development’ (from International Solidarity for Academic Freedom in India and Indian Alliance Paris. *Developmental Violence: The Persistent Denial of Justice-Based Peace for the Indigenous Adivasi Peoples of Bastar Division, Chhattisgarh State, India*. 21 November 2025. Joint submission in response to the call for inputs to the Independent Expert’s Report on Peace and International Solidarity, to be presented to the 62nd session of the UN Human Rights Council in June 2026 (<https://www.academicfreedomindia.com/post/developmental-violence-the-persistent-denial-of-justice-based-peace-for-the-indigenous-ativasi-peoples-of-bastar-division-chhattisgarh-state-india>)).

⁵ Chhattisgarh was carved out of the state of Madhya Pradesh in 2000, at the same time as the neighbouring state of Jharkhand was carved out of the central-eastern state of Bihar. It has been argued that ‘smaller states’ would provide a better administration and so also development of all peoples in the regions, including the Adivasis/Indigenous Peoples, who formed over a quarter of the population in both states. However, as time passed, it became clear that this policy instead allowed the neoliberalism-favouring governments of the time and thereafter, to set up and become key players in extractivist regimes in both states, in spite of having legislations that are meant to operationalize Adivasi/Indigenous Peoples’ land rights and rights to resources in Adivasi regions (Adhikari, A. and Chhotray, V. The political construction of extractive regimes in two newly created Indian states: a comparative analysis of Jharkhand and Chhattisgarh. *Development and Change*, 2020, 51(3), pp. 843–873 (<https://doi.org/10.1111/dech.12583>); Munda, R.D. and Bosu Mullick, S. (eds) *The Jharkhand Movement: Indigenous Peoples’ Struggle for Autonomy in India*. Copenhagen, IWGIA, 2003. (https://iwgia.org/images/publications/0120_jharkhand_movement.pdf)).

The Bastar Division lies in the central Indian state of Chhattisgarh, covering an area of 39,000 km² comprising eco-sensitive and biodiverse forested hills and river systems. As per the 2011 census of India (latest census), there are 42 Scheduled Tribes in Chhattisgarh with a total population of 7,822,902. That is, the Adivasis/Indigenous Peoples form ~30% of Chhattisgarh’s population. A significance proportion live in the Bastar Division, including the Gond, Koya, and Madia tribes. In all, Adivasis/Indigenous Peoples form about 70% of Bastar Division’s 2.8 million people and all its seven districts are Fifth Schedule Areas. Bastar is also highly resource rich. (Census India (2011). A-11 Appendix: District wise scheduled tribe population (Appendix) Chhattisgarh. Table series number A10ST1. New Delhi: Office of Registrar General and Census Commissioner. <https://censusindia.gov.in/census.website/data/census-tables>). See also Chakravarti, S. *Clear Hold Build: Hard Lessons of Business and Human Rights in India*, Harper Collins, India, 2014.

⁶ Since 1947, the Indian State has consistently used military force to eliminate internal rivals perceived as significant threats, such as the crushing of the Telangana peasant’s struggle (1948–1951) and the killing of the last ruling head of the Bastar state, Pravir Chandra Bhanja Deo, in ‘police action’ in 1966. The numerous Adivasi/Indigenous communities, including forest dwelling tribes, were incorporated by the state within its borders without their prior consent. In the early decades of state formation, the ‘development’ paradigm was rooted in a grand narrative of industrialization for self-sufficiency in which the displacement of some peoples was inevitable for the ‘greater common good’. Since the 1990s, with the adoption of the liberalization, privatization and globalization agenda by

successive union and regional governments, the narrative of development has become tied to ‘internal security’ to justify land alienation and dispossession in Scheduled Areas alongside the structural adjustment required by the international financial institutions such as World Bank, in which public service oriented governance and existing public service institutions are systematically dismantled in favour of privatisation (Dhanagare, D.N. (1991) *Peasant Movements in India, 1920-1950*. Delhi: Oxford University Press; Sundar, N. (2007). *Subalterns and Sovereigns: An Anthropological History of Bastar (1854-2006)* (Second edition). New Delhi: Oxford University Press; Sharma, B.D. (2010) *Unbroken History of Broken Promises—Indian State and the Tribal People*, New Delhi: Freedom Press; Prasad, V. *The Poorer Nations: A possible history of the Global South*. Verso, 2012); Garge, R. Left wing extremism – a brief security review. 26 July 2017. Vivekananda International Foundation (<https://www.vifindia.org/article/2017/july/26/left-wing-extremism-a-brief-security-review>); India Justice Project and European Center for Constitutional and Human Rights (IJP & ECCHR). *In the Name of Development: Indigenous Rights Violations and Shrinking Space In Chhattisgarh*. Berlin: ECCHR, 2022 (https://www.ecchr.eu/fileadmin/user_upload/ECCHR_CHHAT_WEB_DS.pdf); Sundar, N. (2023) ‘We will teach India democracy’: Indigenous voices in constitution making. *Journal of Imperial and Commonwealth History*, published online 27 April 2023; <https://doi.org/10.1080/03086534.2023.2196838>); <https://www.pib.gov.in/newsite/printrelease.aspx?relid=82281>)).

⁷ The Naxalite movement, is rooted in the 1967 Naxalbari uprising – a peasant revolt in West Bengal advocating for land redistribution. While the original revolt was severely repressed by the state, in the 1980s, some movement leaders entered the Adivasi/Indigenous Peoples’ belt in central-southern-eastern India. The protracted struggle that is now nearly five decades long, is rooted in land dispossession, socio-economic marginalization, and demands for the rights of the Adivasi/Indigenous communities, particularly in forested and tribal regions. In the main, the Naxalites in Adivasi regions are Adivasi/Indigenous Peoples. The government and the media refer to Naxalism as ‘Left-Wing Extremism’ even though Government commissions themselves have also recognized that the roots of insurgency lie in the systemic marginalization and denial of Adivasi rights. The terms Naxalism/Naxalites and Maoism/Maoists are used interchangeably. (Sundar, N. Bastar, Maoism and Salwa Judum, *Economic and Political Weekly* July 22–28 2006, 41, 29, pp. 3187–3192; *Development Challenges in Extremist Affected Areas. Report of an Expert Group to the Planning Commission*, Government of India, New Delhi, April 2008 (<https://tribal.nic.in/downloads/other-important-reports/DevelopmentChallengesinExtremistAffectedAreas.pdf>); *Report of the Committee on State Agrarian Relations and the Unfinished Task in Land Reforms*, Department of Land Resources, Ministry of Rural Development, Government of India, New Delhi, 2009 (<https://cdnbbsr.s3waas.gov.in/s3d69116f8b0140cdeb1f99a4d5096ffe4/uploads/2024/08/20240827227000916.pdf>); *Report of the High Level Committee on Socio-Economic, Health and Educational Status of Tribal Communities of India*, Ministry of Tribal Affairs, Government of India, May 2014, <https://cjp.org.in/wp-content/uploads/2019/10/2014-Xaxa-Tribal-Committee-Report.pdf>); Gaikwad, R. Manmohan: Naxalism the greatest internal threat. *The Hindu*, 17 October 2021 (<https://www.thehindu.com/news/national/Manmohan-naxalism-the-greatest-internal-threat/article16886121.ece>).

⁸ Ministry of Home Affairs. Press Release: National Policy to Combat Left Wing Extremism, 7 February 2024. (<https://www.pib.gov.in/PressReleaseIframePage.aspx?PRID=2003503®=3&lang=2>).

⁹ As per 13 December 2025, there are 586 fortified police stations in Adivasi/Indigenous Peoples’ regions compared with 66 in 2014; 361 new security camps have been built in the past six years, and there are also 68 night-landing helipads. (Press Release, Ministry of Home Affairs. 13 December 2025. From Red Corridor to Naxal-Free Bharat: A Decade of Decisive Gains (2014–2025) (<https://static.pib.gov.in/WriteReadData/specificdocs/documents/2025/dec/doc20251213729901.pdf>). See also Sharma, A. Chhattisgarh’s unquiet peace. *Frontline*, 10 December 2025 (<https://frontline.thehindu.com/politics/chhattisgarh-silver-jubilee-naxalism-development-advansi-land-rights/article70357226.ece>).

¹⁰ Oral statement by ex-President Raghu Midiyami on the ban on Moolvasi Bachao Manch, November 2024, (<https://youtu.be/AufhErqYgGs?si=a3UR4rzCuVRyJ3Rp&t=435>).

¹¹ The Salwa Judum displaced over 350,000 villagers, razed hundreds of Adivasi/Indigenous Peoples’ villages, and perpetrated widespread rapes, disappearances, and extrajudicial executions – none of which has ever been prosecuted. It has been reported that over a period of two years, the Salwa Judum vigilantes burned or cleared out 644 of the 1,354 villages in Dantewada district (‘What is the Salwa Judum?’ Campaign for Peace and Justice in Chhattisgarh Archive (<https://cpjc.wordpress.com/>); Bharadwaj, S. Gravest displacement, bravest resistance: The struggle of Adivasis of Bastar, Chhattisgarh against imperialist corporate landgrab, *Sanhati* 1 June 2009 (<https://sanhati.com/excerpted/1545/>). *When the State Makes War on Its Own People: Violation of Peoples Rights During the Salwa Judum*. People’s Union of Democratic Rights, 2006 (2007) (https://cpjc.wordpress.com/wp-content/uploads/2007/07/salwa_judum.pdf); *Death, Displacement and Deprivation; The War in Dantewada: A Report*, Human Rights Forum, December 2006 (<https://cpjc.wordpress.com/wp-content/uploads/2007/07/hrfdantewadareport.pdf>); ‘Being Neutral is Our Biggest Crime’ Government, Vigilante, and Naxalite Abuses in India’s Chhattisgarh State. Chapter IV Abuses by Salwa Judum, Human Rights Watch, 2008 (<https://www.hrw.org/reports/2008/india0708/index.htm>); Sundar, N. Pleading for Justice. *India Seminar*, No. 607,

2010 (https://www.india-seminar.com/2010/607/607_nandini_sundar.htm); Sundar N. *The Burning Forest: India's War Against the Maoists*. Juggernaut Books, India, 2016; International Solidarity for Academic Freedom in India. 29 September 2025. *State-Inflicted Violence Against Indigenous Adivasi Women in Bastar Division, State of Chhattisgarh, Central India*. Submission to the UN Committee on the Elimination of All forms of Discrimination Against Women 94th Pre-Sessional Working Group on the List of Issues Prior to Reporting (LoIPR) October 2025 (https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/SessionDetails1.aspx?SessionID=2818&Lang=en)).

¹² Security forces in Bastar include militarized units of Chhattisgarh State Police and India's paramilitary forces, which comprise the Central Armed Police Forces (CAPF) and are under the Union Ministry of Home Affairs. These include the Border Security Force (BSF), the Central Reserve Police Force (CRPF), ITBP (Indo-Tibetan Border Police), Central Industrial Security Force (CISF) and Sashastra Seema Bal (SSB). These forces are being used outside of their mandates as regiments by the Government of India under legislative mandates covering thematic areas from border security to industrial security in areas of internal conflict including Kashmir, Manipur and Bastar. In addition, the government of Chhattisgarh also has its own paramilitary formations alongside the state police, such as the District Reserve Guard (DRG) and Bastar Fighters, which in particular recruit Adivasis/Indigenous Peoples. Both the CAPF and the state formations do not have power to arrest or detain a suspect. That power remains with the Chhattisgarh State Police. However, the paramilitary units work along with the police in the region.

¹³ Between 2021 and 2024, at least five major aerial bombardments were reported in Bijapur and Sukma districts. In April 2021, twelve bombs were dropped between Botalanka and Palagudda; in April 2022, coordinated strikes hit Bottetong, Mettagudem, Duled, Sakler, and Pottemang. January 2023 saw bombings across six villages, including Mettaguda and Bottethong, followed by helicopter gunfire. In April 2023, the Morkemetta hills were attacked, leaving behind unexploded ordnance. Most recently, on 7 April 2024, high-intensity explosives were dropped across Palaguda, Ittaguda, Jilorgada, Gommaguda, and Kanchal. In April 2025, aerial assaults were reported in the Karregutta hills along the Telangana border. Eyewitness accounts and photographic evidence collected by local activists confirm direct bombing of agricultural fields and the presence of unexploded ordnance and shrapnel inside people's homes. Here it is to be noted that there is no legal or physical demarcation between Adivasi/Indigenous Peoples' lands and 'conflict zones'. Therefore, every aerial strike necessarily affects civilian areas – homes, agricultural plots, and community forests, forcing people to abandon cultivation and restricting access to forest produce (Forum Against Corporatization and Militarization, Foundation The London Story, International Solidarity with Academic Freedom in India (InSAF India), India Justice Project and London Mining Network, *Violation of Civil and Political Rights of Indigenous Peoples in India*. Submitted to the UN Human Rights Committee for India's ICCPR review (2024), (https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCCPR%2FCSS%2FIND%2F58549&Lang=en); Subramaniam, M. As Maoists ask for ceasefire, security forces shell hills sheltering top insurgent leaders. *Scroll.in*, 29 April 2025 (<https://scroll.in/article/1081780/as-maoists-ask-for-ceasefire-security-forces-shell-hills-sheltering-top-insurgent-leaders>)).

¹⁴ A major proportion of the above mentioned numbers of military installations in Note 9 are in Bastar, where in many areas, the security camps are sited every 2–5 km. A ratio of one armed personnel for every nine civilians has been found. The security camps have led to armed policing of forest access and the systematic collapse of civilian administration. They are constructed, often overnight to avoid resistance, on Indigenous land under the pretext of facilitating 'development' for Indigenous communities in the region. That is, these constructions are not temporary forward posts but permanent installations financed through long-term budgetary allocations and built on Adivasi/Indigenous Peoples' agricultural and forest land, without consent or due process, institutionalizing occupation. In this, the government's connectivity infrastructure, e.g. mobile towers, and the welfare programme, Niyad Nellanar, has become a mechanism for normalizing this occupation – ostensibly designed to 'bring development to remote areas', the scheme routes essential public services – rations, healthcare, education, and identity documentation – through the security camps comprising heavily fortified compounds encircled by barbed wire and armed patrols. The scheme's implementation has thereby normalized armed forces presence in everyday life and rendered civilian administration redundant. Village life is under much surveillance, with freedom of movement curtailed by checkpoints and patrols. People are fearful of venturing into the forests as activities essential to subsistence, for example the collection of minor forest produce, fetching water, or grazing cattle, are subject to harassment, intimidation, and surveillance. The weekly markets, which form the backbone of the local economy, have come under heavy military presence, undermining women's ability to trade and sustain household income (Ganjendra Mandavi. What is Adivasi Perspective on the so-called development? Meeting at Jawaharlal Nehru University, April 2022 (https://youtu.be/U_mGxqXMHFE?si=vEMKC18FgvT4ddDB); *Citizens' Report on Security and Insecurity, Bastar Division, Chhattisgarh*, August 2024, (https://cgnarratives.github.io/report_en.pdf); ; ETVBharat. Watevagu camp in PLGA stronghold to boost anti-Naxalite ops. *ETVBharat* 22 December 2024 (<https://www.etvbharat.com/en!/bharat/watevagu-camp-in-plga-stronghold-to-boost-anti-naxalite-ops-enn24122204031>); InSAF India and London Mining Network. Session 2: Behind the deadline: resource extraction and the state-corporate nexus, 5 June 2025 (<https://youtu.be/Qnny6h3kWIM?si=FI25f87ZaxoH1b8P&t=733>); New Security Camps In Sukma, Bijapur Under 'Niyad Nellanar' Scheme Bring Development. *ETV Bharat*, 14 September 2025 (<https://www.etvbharat.com/en!/state/new-security-camps-in-sukma-bijapur-under-niyad-nellanar-scheme>

[bring-development-enn25091403218](#)); Ministry of Home Affairs, Press Release: Union Home Minister and Minister of Cooperation Shri Amit Shah addresses the valedictory session of ‘Bharat Manthan-2025: Naxal Mukta Bharat - Ending Red Terror Under Modi’s Leadership’ in New Delhi, 28 September 2025 (<https://www.pib.gov.in/PressReleasePage.aspx?PRID=2172513>); PTI. Senjo, M.R. ed. Security forces set up new camp in Chhattisgarh's Maoist stronghold. *Rediff* 23 November 2025 (<https://www.rediff.com/news/report/security-forces-set-up-new-camp-in-chhattisgarhs-maoist-stronghold/20251123.htm>); Subramaniam, M. As Maoists retreat, why many fear security forces in Chhattisgarh villages. *Scroll.in*, 26 January 2026 (<https://scroll.in/article/1090115/as-maoists-retreat-why-many-fear-security-forces-in-chhattisgarh-villages>).

¹⁵ As mentioned in Note 7, is well known that today the Naxalite movement is itself overwhelmingly composed of Adivasi/Indigenous Peoples, many of whom took up arms as a political response to protracted land alienation, economic exploitation, and systemic State violence. The Supreme Court of India, in *Nandini Sundar & Ors. v. State of Chhattisgarh* (2011), explicitly condemned the government’s practice of recruiting Adivasis/Indigenous Peoples into the police, recognizing that arming untrained Adivasi youth to fight their own communities was an abdication of constitutional responsibility. Despite this, the model persists under the new labels. (Sharma, A. The Adivasis bear the brunt: Bela Bhatia. *Frontline* 9 April 2025 (<https://frontline.thehindu.com/the-nation/adivasi-rights-bastar-militarisation-bela-bhatia/article69399495.ece>); Kandasamy, M. ‘Paramilitary forces dance after killing Adivasis’: Soni Sori, *Frontline*, 15 March 2025 (<https://frontline.thehindu.com/social-issues/social-justice/interview-with-tribal-rights-activist-soni-sori-corporate-greed/article69332872.ece>); Bharadwaj, A. In Chhattisgarh, the war on Maoists becomes a war on Adivasis, *Frontline*, 9 April 2025 (<https://frontline.thehindu.com/the-nation/battleground-bastar-maoist-insurgency-counter-operations/article69396194.ece>); Kumar, R. Accused of extrajudicial killings by families of victims, former Maoists-turned-police troopers say they yearn for peace. *Article-14* 12 March 2025 (<https://www.article-14.com/post/accused-of-extrajudicial-killings-by-families-of-victims-former-maoists-turned-police-troopers-say-they-yearn-for-peace-67d0fad548fd6>); Subramaniam, M. Skill training for surrendered Maoists or forced detention by Chhattisgarh police? *Scroll.in* 22 August 2025 (<https://scroll.in/article/1085674/skill-training-for-surrendered-maoists-or-forced-illegal-detention-by-chhattisgarh-police>); (BBC News Hindi.

Naxalites के खिलाफ मोर्चे पर तैनात DRG का आंखों देखा हाल और आदिवासियों की आपबीती Ground Report [Eyewitness accounts of Adivasi experiences and DRG deployed on the frontlines against Naxalites] Uploaded 29 September 2025 (<https://youtu.be/6psspY5HHoM>).

¹⁶ *Citizens’ Report on Security and Insecurity, Bastar Division, Chhattisgarh, August 2024*, pp. 9,58,74, https://cgnarratives.github.io/report_en.pdf; International Solidarity for Academic Freedom in India (InSAF India), India Justice Project, London Mining Network, Indian Alliance Paris, *Bastar’s Endangered Traditional Economic Practices*, 15 March 2025, Submission for the United Nations Expert Mechanism on the Rights of Indigenous Peoples (EMRIP) *Report of the Expert Mechanism on the Rights of Indigenous Peoples: the Rights of Indigenous Peoples to Their Traditional Economies*, May 2025, <https://www.ohchr.org/sites/default/files/documents/issues/indigenouspeoples/emrip/cfis/study-trad-eco/subm-indigenous-their-traditional-ngo-insaf.pdf>; <https://docs.un.org/en/A/HRC/EMRIP/2025/3>); Press Release, Ministry of Home Affairs, 10 April 2025. Naxal Mukta Bharat Abhiyan: From Red Zones to Growth Corridors: India’s Decisive Battle Against Left Wing Extremism, (<https://www.pib.gov.in/PressReleasePage.aspx?PRID=2120771>).

¹⁷ See Notes 1 and 2, and for a detailed account including explanations for the various categories of tribes, including Schedule Tribes and OTFDs, see International Solidarity for Academic Freedom in India (InSAF India), Adivasi Researchers Collective, Bagaicha Social Centre, London Mining Network, India Justice Project, Indian Alliance Paris. *Citizens in Waiting for Over Seven Decades: The Struggle of India’s Adivasi and Other Traditional Forest-Dwelling Peoples for Recognition of Their Indigenous Rights*, March 2025 (<https://www.ohchr.org/sites/default/files/documents/cfi-subm/report-60th-session/subm-60th-session-aca-2-insaf-india.pdf>).

The Fifth and Sixth Schedules of India’s Constitution establish ‘the centrality of rights to land and autonomy to the attainment of all other fundamental and human rights of Adivasis and indigenous peoples’ through upholding of customary laws and devolving land-related decision-making, including consent for land acquisition for mining/industrial/militarization projects, to institutions like the Gram Sabha (Village Council) in both national and state-specific legislation’ (Human Rights Lawyering Clinic (HRLC), National Law School of India University, *Human Rights and Environmental Implications of the Proposed Sijimali Bauxite Mine in Odisha*, 2024, p.9 (<https://www.nls.ac.in/wp-content/uploads/2024/04/Under-the-Surface-Human-Rights-and-Environmental-Implications-of-the-Proposed-Sijimali-Bauxite-Mine-in-Odisha.pdf>)). Chhattisgarh’s core legal framework thus comprises *Provisions of the Panchayats (Extension to Scheduled Areas) Act, 1996* (PESA), *Chhattisgarh Provisions of the Panchayat (Extension to the Scheduled Areas) Rules, 2014*, *Chhattisgarh Land Revenue Code, 1959 (Amendments)* and the *Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act 2006* (FRA), and the *Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act 2013* (LARR).

However, with respect to the Scheduled Areas, while FPIC implies actively seeking consent of Indigenous communities at the point of conceptualizing a development/mining project, and respecting their right to withhold

consent if deemed appropriate by the community in accordance with their historical customary land rights and resources stewardship, India's land rights legislation contains different standards of consent, ranging from consultation to FPIC. Under PESA, the State only has to consult Gram Sabhas as 'one among several stakeholders whose perspective must be accounted for in determining developmental priorities ... before granting licenses or leases for already-planned mining in Scheduled Areas'. LARR makes consultation mandatory via public hearings and seeking consent from local representative bodies. FRA and Forest Conservation Rules recognize the right to FPIC. On the ground, FPIC is commonly treated as a 'check-list' item for demonstrating agreement of the affected communities, often following 'coercion, duress, threats, or intimidation' (HRLC, 2024, pp.41–42).

In addition, as the Indian State retains the colonial principle of eminent domain, it 'retains the legal authority to determine "lawful" and "unlawful" uses of land, administrative categorization of STs [Scheduled Tribes], their status as rights holders or encroachers, as well as developmental priorities and allocation of resources' (HRLC, 2024, pp.34–35). For example, under the *Mines and Minerals (Development and Regulation) Act 1957*, the state authorities grant public agencies and private actors leases for mineral exploration and mining 'with no participation of rightsholders and affected communities' (HRLC, 2024, p.10). Legislative amendments and new laws have further diluted existing guarantees of self-governance to enable ease of access to Adivasi/Indigenous Peoples' lands for extractive and developmental projects. For instance, amendments to the *Forest Conservation Act, 1980*, have removed the requirement for mandatory consent from forest-dwelling communities when seeking government approval for forest land diversion (Tapasya. Minister says new forest laws don't dilute tribal rights. they do – and govt planned dilution since 2019. *Article-14*, 19 September 2022 (<https://article-14.com/post/minister-says-new-forest-laws-don-t-dilute-tribal-rights-they-do-and-govt-planned-dilution-since-2019-6327ce7b38a42>)).

Finally, authorities routinely manipulate Gram Sabha meetings to falsely demonstrate that consent has been obtained for projects, ignoring decisions made by the community. Just as one example, in the Chargaon Metabodli Mines project, a false Gram Sabha was held in a different village (Pakhanjor) instead of having the meeting in the village of Chargaon, and false records were created (Section 6.1 in *Citizens' Report on Security and Insecurity, Bastar Division, Chhattisgarh*, 12 August 2024 (https://cgnarratives.github.io/report_en.pdf#)).

¹⁸ Singh, Y., Parihar, P.S. and Maithani, P.B. (2012). Rare-Metal and Rare-Earth Mineral Resources of Chhattisgarh: A Boon for Economic Development. In Proceedings of the National Seminar on 'Emerging Trends in Scientific Research'. New Delhi: Excellent Publishing House, pp. 136–172 (https://www.researchgate.net/publication/316715989_RARE-METAL_AND_RARE-EARTH_MINERAL_RESOURCES_OF_CHHATTISGARH_A_BOON_FOR_ECONOMIC_DEVELOPMENT); *The Economic Times*. India to launch first-ever auction of critical mineral blocks, including world's new fuel, from Nov 29. 28 November 2023 (<https://economictimes.indiatimes.com/industry/indl-goods/svs/metals-mining/india-to-launch-first-ever-auction-of-critical-mineral-blocks-including-worlds-new-fuel-from-nov-29/articleshow/105555755.cms>); Jayaram, D. and Ramu, C.M. India's critical minerals strategy: Geopolitical imperatives and energy transition goals. FIIA Briefing Paper 386, FIIA Publications, April 2024 (https://fii.a.fi/wp-content/uploads/2024/04/bp386_indias-critical-minerals-strategy.pdf); Government of India, Ministry of Mines. *Annual Report of Ministry of Mines 2024–2025* (<https://mines.gov.in/admin/download/67b42e623b87e1739861602.pdf>).

¹⁹ For example, recently, one gold block in Kanker District and three iron-ore blocks in Bailadila, Dantewada District – covering over 2,500 hectares – have been leased for extractive purposes. In March 2025, ArcelorMittal S.A. (Luxembourg), through its joint venture ArcelorMittal Nippon Steel India, obtained a Composite Licence to explore and mine two 850-hectare forest blocks (Bailadila Deposits 01A and 01B) in Dantewada district. The iron ore blocks fall within the Bailadila Reserved Forest, part of the Indravati River catchment, a vital watershed for the region. The forests are dense tropical and mixed deciduous, home to endangered species and the hills are sacred sites for Adivasi/Indigenous communities. The local Adivasi/Indigenous communities were neither notified nor consulted, even though these communities have opposed mine expansions and fraudulent 'consent' processes for years. In Narayanpur District, three iron-ore blocks, including one exceeding 1,000 hectares, are prepared for auction. Numerous surveys and exploration licences are underway. All these clearances have been granted without FPIC (Kukreti, I, Chinnapannavar, S. and Thakur, P. Chhattisgarh may have stopped Bailadila mining, but for how long? *DownToEarth*, 5 July 2019 (<https://www.downtoearth.org.in/mining/chhattisgarh-may-have-stopped-bailadila-mining-but-for-how-long--65461>)); Chhattisgarh ends iron ore mining deal with Adani Group, *CW Construction World.in*, 29 September 2023 (<https://www.constructionworld.in/energy-infrastructure/coal-and-mining/chhattisgarh-ends-iron-ore-mining-deal-with-adani-group/44995>); 'Section 3.2. Mining' of the *Citizens Report on Security and Insecurity* (2024, pp. 13–15); (<https://mines.gov.in/webportal/content/details-of-successful-auction-during-the-year>); Gera, S. in Will Modi Sarkar listen to the Adivasis of Bastar now that the Maoist insurgency is nearing its end? *The Wire* 30 May 2025 (<https://youtu.be/yIWfCGXCMpE?si=0sNRgFmcD6udVemE>); Sundar, N. in Session 3: Courts as Instruments of State Power – Judicial Complicity in Indigenous Dispossession and Criminalisation in Adivasi Regions in India, 19 June, 2025 (<https://www.academicfreedomindia.com/deadline-or-death-sentence-webinar-series/session-3-behind-the-deadline>)).

²⁰ FPIC – see Note 17. For example, in Raoghat and Aamdai Hills, large-scale iron-ore projects were approved without Gram Sabha consultation or consent. Where assemblies met and objected, their resolutions were dismissed

as ‘non-binding’. Key transport corridors – such as the Rowghat–Jagdalpur railway line – have been pushed through with extensive deforestation and compulsory acquisition, accompanied by the installation of new security camps to ‘protect’ project sites. The 52-km Nelasnar-Gangalur road runs close to the Bailadila iron-ore mines. It traverses 17 Adivasi/Indigenous Peoples’ villages and is punctuated at intervals of 3–5 km by approximately 11 security camps (*Citizens’ Report on Security and Insecurity, Bastar Division, Chhattisgarh*, August 2024 (https://cgnarratives.github.io/report_en.pdf); Will Modi Sarkar listen to the Adivasis of Bastar now that the Maoist insurgency is nearing its end (<https://www.youtube.com/watch?v=yIWfCGXCMpE>); Behind the Deadline (1): Resource Extraction and the State-Corporate Nexus (<https://www.academicfreedomindia.com/deadline-or-death-sentence-webinar-series/session-2-behind-the-deadline>)).

²¹ Subramaniam, M. (8 June 2021). At Bastar protest site, the young almost brokered a breakthrough – but now fear police harassment. *Scroll.in* (<https://scroll.in/article/996938/at-bastar-protest-site-the-young-almost-brokered-a-breakthrough-but-now-fear-police-harassment>); Subramaniam, M. (20 February, 2022) In Bastar, Bhumkal inspires young Adivasis to keep nine-month-old Silger protest alive, *Scroll.in* (<https://scroll.in/article/1017776/in-bastar-bhumkal-inspires-young-adivasis-to-keep-nine-month-old-silger-protest-alive>).

²² See Endnote 11, and Raman, S. and Saraswati, B. Caring and fierce, jailed Adivasi activist Suneeta Pottam fights injustice everyday in Bastar. *BehanBox*, 3 July 2024 (<https://behanbox.com/2024/07/03/caring-and-fierce-jailed-adivasi-activist-suneeta-pottam-fights-injustice-everyday-in-bastar/>).

²³ At the protest site level, each sit-in or dharna elected its own President or Sachiv from within the directly affected village, ensuring accountability to the community and guaranteeing that decisions originated from the people impacted and from concrete grievances such as land acquisition without consent or arrests of community members, and were conducted in village spaces visible to all. For example, communities with the help of MBM exercised their constitutional powers by passing resolutions in Gram Sabhas explicitly rejecting police camps and unlawful land acquisition. These resolutions served as the democratic foundation for community demands and grounded the protests in the Fifth Schedule and PESA (see Note 17). In addition, MBM submitted petitions, memoranda and letters to administrative or political authorities. Memorial meetings, cultural events, and observances that affirmed community identity, collective memory and solidarity with other national and global struggles were also organized. Permissions for such gatherings were regularly notified to district authorities, underscoring the open and transparent character of the justice-based peacebuilding movement. Engagements with the authorities were directed towards securing lawful remedies and demonstrated the movement’s consistent effort to seek dialogue. MBM’s Constitution and Regulations 2021 available at: <https://www.scribd.com/document/797501250/उद-देश-य-व-नियमवाली-मूलवासी-बचाओ-मंच>.

²⁴ Around 40 Adivasi/Indigenous youth leaders have been imprisoned since 2022. Harassment and persecution included confiscation of personal property such as mobile phones, beatings, coercion to surrender as ‘Naxalites’, and being arbitrarily picked up from homes or protest sites or when travelling between them or to seek State permission for holding events, and sexual intimidation of women. On 3 September 2024, India’s National Investigation Agency (NIA) conducted multiple raids in Narayanpur on about 35 Indigenous Adivasi people including social activists, and another arrest warrant was issued for Lakhma Koram under the anti-terrorism law, Unlawful Activities (Prevention) Act (UAPA). Entire protest gatherings also face repression and the sites demolished. In February 2025, in the fourth arson attack by security forces on Madhonar Jan Andolan’s Toyameta site, banners displaying martyrs, Indian Constitution, PESA/FRA, tents, and other belongings of the people were set on fire. Mobile phones were banned so that the attack could not be filmed. (Campaign for Peace and Justice in Chhattisgarh, Unlawful arrest, detention and extrajudicial killing of villagers in Bijapur District, Chhattisgarh, *Mainstream Weekly*, 16 November 2024, <https://www.mainstreamweekly.net/article15239.html>; Toyameta village is in Bastar district; Press Release 15 February 2025. Madhonar Jan Andolan Toyameta Dharna (Kadiameta Jan Sangharsh) (<https://x.com/IndInsaf/status/1891521581530108053>); Goyal, P. ‘Protest and you’ll be jailed’: Two tribal minor girls held in Bijapur, kin left in dark for 15 days, *Newslaundry* 30 November 2024. (<https://www.newslaundry.com/2024/11/30/protest-and-youll-be-jailed-two-tribal-minors-held-in-chhattisgarh-kin-left-in-dark-for-15-days>); Foundation The London Story, India Justice Project, International Solidarity with Academic Freedom in India (InSAF India), London Mining Network and Indian Alliance Paris. *State Repression of Indigenous Youth Adivasi HRDs-Led Climate Justice Movements in Bastar*, 30 April 2025. Submission for the report of the Special Rapporteur on the situation of human rights defenders working on climate change and a just transition (<https://www.academicfreedomindia.com/post/human-rights-defenders-working-on-climate-change-and-a-just-transition>).

²⁵ Government of Chhattisgarh. 30 October 2024. Chhattisgarh Gazette, Extraordinary, Notification No. F-4-101/Home-c/2024, 30 October, 2024 (https://img.haribhoomi.com/uploadimage/library/free_files/pdf/mahana_2024_11_18_014521.pdf). The notification was made public only on 18 November 2024, thereby effectively negating the legally mandated two-week window to file an appeal against the ban, a blatant violation of due process. See also the oral statement by ex-President Raghu Midiyami in Note 10. On 25 November 2024, activists from the ground alerted that the protest site of the Maad Bachao Manch Jan Andolan [Save Mount Maad People’s Movement] at Orchha village in the district of Narayanpur

was surrounded by police personnel from the Orchha police station from about 4am. The people present at the site were forcefully dispersed and activists on the site were arrested. They noted that ‘an attempt was being made to destroy the Orchha movement’.

²⁶ MBM representatives submitted a formal representation to the State Government on 22 November 2024, within the time allowed by law, and challenged the notification as arbitrary, unsupported by evidence and violative of fundamental rights. The law requires such a representation to be considered by an independent Advisory Board within a fixed period (18 weeks). However, no reply was ever provided, and the statutory period expired on 5 March 2025 without any decision being communicated. After this failure, MBM, through its ex-President, Raghu Midiyami, filed a petition before the High Court of Chhattisgarh. The petition challenged both the ban notification and the constitutionality of the Chhattisgarh Special Public Security Act, highlighting that the Advisory Board had failed to act within the legally mandated period. On 5 May 2025, the High Court dismissed the petition at the admission stage, terming it ‘premature’ on the ground that Advisory Board proceedings were allegedly pending, even though the timeline had already lapsed. MBM then filed a Special Leave Petition before the Supreme Court of India, which the Court summarily dismissed on 25 August 2025, echoing State narratives by labelling the petitioners as ‘Maoists’.

²⁷ Arrests are largely made on the ground of being ‘associates’ of the Communist Party of India (Maoist). Some individuals booked in old cases dating years, suddenly revived to justify their incarceration. Others named in freshly fabricated cases. In every instance, the unstated reason was association with MBM and participation in MBM protests or leadership activities. See for example, Frontline Defenders, Arrest and detention of four indigenous human rights defenders in Bastar District. 2024 (<https://www.frontlinedefenders.org/en/case/arrest-and-detention-four-indigenous-human-rights-defenders-bastar-district-chhattisgarh-2>); UN Special Rapporteur for Human Rights Defenders. India: arrest and ongoing detention of Adivasi human rights defenders Raghu Midiyami and Suneeta Pottam (joint communication), 9 October 2025 (<https://srdefenders.org/india-arrest-and-ongoing-detention-of-ativasi-human-rights-defenders-raghu-midiyami-and-suneeta-pottam-joint-communication/>).

²⁸ Sharma, A. Insurgencies end through political settlements, not just military action: Ajai Sahni. *Frontline*, 10 April 2025 (<https://frontline.thehindu.com/the-nation/india-naxal-insurgency-2026-political-solution-chhattisgarh-ajai-sahni/article69380987.ece>); India Justice Project and European Center for Constitutional and Human Rights. *In the Name of Development: Indigenous Rights and Shrinking Space in Chhattisgarh*. ECCHR, 2022 (<https://www.ecchr.eu/en/case/shrinking-space-in-chhattisgarh/>).

To date, the Indian State has not utilized peaceful dispute resolution mechanisms for any territorial disputes. India has chosen to engage militarily with its own citizens, with specialized counterinsurgency units that are legally permitted to murder and torture without any consequences against the perpetrators. India also does not have any law in force that permits conscientious objection, which means that anyone who categorically denies following an order of a superior can have legal proceedings initiated against them and face stringent jail sentences under one or more of draconian ‘anti-terror’ and ‘law and order’ instruments including *Armed Forces (Special Powers) Act*, the *National Investigation Agency Act*, the *Unlawful Activities (Prevention) Act*, as well as regional state legislations such as the *Chhattisgarh Special Public Security Act*, the *Andhra Pradesh Public Security Act*, the *Odisha Special Armed Police Act*, the *West Bengal Maintenance of Public Order Act*, among others, to provide complete impunity to the the Indian army or the Central Armed Police Forces (see Note 12) during operations against the combatants. Specifically in regard to Bastar, all attempts at peace talks since 2004 have also thus failed. For example, in 2004, during the Andhra Pradesh peace talks, the Naxalites agreed to a ceasefire with the State. However, only a few months later, the talks collapsed as the State conducted targeted Naxalite killings, arrest of cadres, and attempted to infiltrate and expose the networks of the Naxalites. Similarly, in West Bengal’s Jangalmahal (Lagarh), local protests by Adivasi/Indigenous Peoples’ groups against land and forest grievances, as well as police atrocities led to massive agitations against the state government. The state government appointed interlocutors for the negotiation. However, multiple security actions as well as the targeted extra judicial killing of a senior politburo leader in a military operation in 2011 by the Indian State and the West Bengal state government meant that the confidence in the talks was shattered. The interlocutors stepped down from their positions, and there was distrust in the Maoist camps against the actions of the State (Navlakha, G. Impunity, war and justice. *Sanhati*, 2014 (<https://sanhati.com/excerpted/9771/>); Burke, J. Indian forces claim to have killed Maoist commander Kishenji. *The Gaurdian*, 24 November 2011 (<https://www.theguardian.com/world/2011/nov/24/indian-maoist-commander-kishenji-killed>); Haragopal G. The Maoist Movement and the Indian State: mediating peace. *Socio-Legal Review*, 2012, 8(1), p. 113 (<https://repository.nls.ac.in/cgi/viewcontent.cgi?article=1022&context=slr>); Ray, P.R. Peace as a weapon of war against people. In: *War and Peace in Junglemahal: People, State and Maoists*, Ed: Biswajit Roy, Raj Publications, 2014; Maringanti, A. Talks between the Maoists and the State: Learning from the Andhra Experience. *Economic and Political Weekly*, August 21–27 2010, 45(34), pp.39–43, 45). Reproduced from: International Solidarity for Academic Freedom in India and Indian Alliance Paris. *Developmental Violence: The Persistent Denial of Justice-Based Peace for the Indigenous Adivasi Peoples of Bastar Division, Chhattisgarh State, India*. 21 November 2025. Joint submission in response to the call for inputs to the Independent Expert’s Report on Peace and International Solidarity, to be presented to the 62nd session of the UN Human Rights Council in June 2026 (<https://www.academicfreedomindia.com/post/developmental-violence-the-persistent-denial-of-justice-based-peace-for-the-indigenous-ativasi-peoples-of-bastar-division-chhattisgarh-state-india>)).

²⁹ Lamba, S. NHRC records of the killings in Bastar raise more questions than answers. *The Wire*, 3 August 2025 (<https://thewire.in/rights/nhrc-records-of-the-killings-in-bastar-raise-more-questions-than-answers>).

³⁰ Subramaniam, M. The claims, the truth and the body bags of karregutta op. reporters collective, 17 July 2025 (<https://www.reporters-collective.in/trc/the-claims-truth-and-body-bags-of-karregutta-op>).

³¹ For a recent example see: Advocate Bela Bhatia's X post dated 5 February 2025: 'Police Raj in Bastar? TI Gangalur Bijapur district has refused to admit a police complaint by family members of those killed in the 1 February 2025 fake encounter. "We don't admit a complaint against the police," he said. People determined not to move.' (<https://x.com/Belaben/status/1887132233968013337>). See also Aggarwal, N. Justice abducted: The Jagdalpur Legal Aid Group's latest tryst with injustice. *Bar and Bench*, 25 May 2017 (<https://www.barandbench.com/columns/justice-abducted-jagdapur-legal-aid-group>).

³² For example, see Mishra, R. Activist claims that Abujhmad encounter was fake, four children injured. *Hindustan Times* 18 December 2024 (<https://www.hindustantimes.com/india-news/activist-claims-that-abujhmad-encounter-was-fake-four-children-injured-101734522118586.html>); Goyal, P. 'Bullet lodged near her vertebrae': Four children fired at by security forces in Chhattisgarh. *NewsLaundry* 18 December 2024. (<https://www.newslaundry.com/2024/12/18/bullet-lodged-near-her-vertebrae-four-children-fired-at-by-security-forces-in-chhattisgarh>).

³³ India Justice Project and European Center for Constitutional and Human Rights (IJP & ECCHR). *In the Name of Development: Indigenous Rights Violations and Shrinking Space In Chhattisgarh*. Berlin: ECCHR, 2022 (https://www.ecchr.eu/fileadmin/user_upload/ECCHR_CHHAT_WEB_DS.pdf); see also Choudhury, C. The NCST's report on gangrapes and assaults in Bastar says there is a breakdown of discipline among security forces. *The Caravan* 12 May 2016 (<https://caravanmagazine.in/vantage/bastar-ncst-report-gangrapes-assaults-result-breakdown-discipline>); ICF Team. NHRC indicts Chhattisgarh police for sexual violence against Adivasi women in Bastar. *Indian Cultural Forum* 11 January 2017 (<https://indianculturalforum.in/2017/01/11/nhrc-indicts-chhattisgarh-police-for-sexual-violence-against-ativasi-women-in-bastar/>).

³⁴ Chitkara, R. From forest to prison, when security laws criminalise Adivasi resistance. *Outlook*, 21 January 2026 (<https://www.outlookindia.com/national/voices-from-prison-how-indias-security-laws-criminalise-ativasi-resistance>); UN Special Rapporteur for Human Rights Defenders. India: arbitrary arrest and detention of Adivasi woman human rights defender Suneeta Pottam (joint communication). 15 October 2024 (<https://srdefenders.org/india-arbitrary-arrest-and-detention-of-ativasi-woman-human-rights-defender-suneeta-pottam-joint-communication/>); Bhatia, G. Punished for Seeking Justice: India's Supreme Court Ruling in Himanshu Kumar v. State of Chhattisgarh, *Völkerrechtsblog*, 26 October 2022 (<https://voelkerrechtsblog.org/punished-for-seeking-justice/>).

³⁵ For example, see the 2025 joint communication by UN Special Rapporteurs for Human Rights Defenders, Promotion and Protection of the Right to Freedom of Opinion and Expression, Freedom of Peaceful Assembly and Association, Minority Issues and the Working Group on Arbitrary Detention on the rearrest of Adivasi WHRD Suneeta Pottam: India: arbitrary arrest and detention of Adivasi woman human rights defender Suneeta Pottam (joint communication). 15 October 2024 (<https://srdefenders.org/india-arbitrary-arrest-and-detention-of-ativasi-woman-human-rights-defender-suneeta-pottam-joint-communication/>); see also the case of Sheela Marandi, who was rearrested several times, including in 2021 (Persecuted Prisoners Solidarity Committee. Sheela Marandi: another victim of injudicious system. *CounterCurrents*, 8 July 2016 (<https://countercurrents.org/2016/07/sheela-marandi-another-victim-of-injudicious-system/>)).

³⁶ The assertion that thousands of Adivasis have been arrested on fabricated allegations of so-called 'Naxal activities' is grounded in a sustained and consistent pattern identified in extensive empirical research conducted by the Jagdalpur Legal Aid Group, who worked in the region between 2013 and 2019: the majority of prisoners in Bastar prisons (which are also among the most overcrowded in the country) are Adivasi/Indigenous undertrials, with most charged in cases categorized as 'Naxal offences'. The accused were predominantly illiterate Adivasi/Indigenous men between the ages of 18 and 30, with subsequent acquittal rates ranging between 95% and 98% in several districts (Jagdalpur Legal Aid Group. *Undertrial Prisoners in the Bastar Division, 2015* (https://sanhati.com/wp-content/uploads/2015/11/Undertrial-prisoners_Bastar.pdf); Pandey, S. Anti-Terrorism Courts and Procedural (In)Justice: The Case of the National Investigation Agency (NIA) Special Courts in South Chhattisgarh, India. *Socio-Legal Review*, 2020, 16(1), pp.109–139; <https://repository.nls.ac.in/slr/vol16/iss1/5/>)).

This criminalization of Adivasis/Indigenous Peoples' has been acknowledged in official government reports (e.g. Ministry for Tribal Affairs, Government of India. *Report of the High Level Committee on Socioeconomic, Health and Educational Status of Tribal Communities of India, Ministry for Tribal Affairs, 2014*, section 9.11 (<https://cjp.org.in/wp-content/uploads/2019/10/2014-Xaxa-Tribal-Committee-Report.pdf>). In recognition of this systemic injustice, repeated demands have been made for the release of undertrial prisoners in Bastar. Although successive governments have responded by constituting committees to reassess cases against the Adivasis/Indigenous Peoples, for example the Patnaik Committee and the Buch Committee, these initiatives have remained largely ineffectual (Indigenous Peoples Rights International. *Criminalisation of Adivasis and the Indian*

Legal System. November 2021. Baguio City, Philippines, pp.203–204 (<https://iprights.org/wp-content/uploads/2025/11/Criminalisation-of-Adivasis-and-the-Indian-Legal-System-Full-Report.pdf>).

³⁷ Subramaniam, M. Rs 5 crore bounty: Are rewards making anti-Maoist operations more deadly? *Scroll.in* 12 August 2024 (<https://scroll.in/article/1071794/rs-5-crore-bounty-are-rewards-making-anti-maoist-operations-more-deadly>); Kumar, R. Accused of extrajudicial killings by families of victims, former Maoists-turned-police troopers say they yearn for peace. *Article-14* 12 March 2025 (<https://www.article-14.com/post/accused-of-extrajudicial-killings-by-families-of-victims-former-maoists-turned-police-troopers-say-they-yearn-for-peace-67d0fad548fd6>); see also Annexure G in *Violation of Civil and Political Rights of Indigenous Peoples in India, Forum Against Corporatization and Militarization, Foundation The London Story, International Solidarity with Academic Freedom in India (InSAF India), India Justice Project and London Mining Network*, p. A99. Submitted to the UN Human Rights Committee for India's ICCPR review (2024), (https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCCPR%2FCSS%2FIND%2F58549&Lang=en). The lists provide varying details of the police's identification of the victims of the following: names, father's name (or spouse name for a woman if identified as married), age, village of origin and facial photograph of the deceased.)

³⁸ PTI. 10 Naxalites killed in Chhattisgarh's Gariaband carried total Rs 5.25 crore bounty. *Press Trust of India* 12 September 2025 (<https://www.ptinews.com/story/national/10-naxalites-killed-in-chhattisgarhs-gariaband-carried-total-rs-5-25-crore-bounty/2909194>); PTI. Basavaraju, 26 other slain Naxalites carried cumulative bounty of Rs 3.33 cr in Chhattisgarh: Police. *The Economic Times* 23 May 2025 (<https://economictimes.indiatimes.com/news/defence/basavaraju-26-other-slain-naxalites-carried-cumulative-bounty-of-rs-3-33-cr-in-chhattisgarh-police/articleshow/121353240.cms>).

³⁹ Note that killings such as that of a six-month-old baby, or the dead body discovered by a journalist in Kummam (see Representative Incidents in this annexure), are absent in police reports to the NHRC.

⁴⁰ Subramaniam, M. Baby, 2 Teens & 3 men die in January, as Bastar's anti-Maoist war intensifies. Families accuse police, they blame Maoists. *Article-14* 5 February 2024 (<https://tribe.article-14.com/post/baby-2-teens-3-men-die-in-january-as-bastar-s-anti-maoist-war-intensifies-families-accuse-police-they-blame-maoists-65c05f5bd0d1c>).

⁴¹ Subramaniam, M. Baby, 2 Teens & 3 men die in January, as Bastar's anti-Maoist war intensifies. Families accuse police, they blame Maoists. *Article-14* 5 February 2024 (<https://tribe.article-14.com/post/baby-2-teens-3-men-die-in-january-as-bastar-s-anti-maoist-war-intensifies-families-accuse-police-they-blame-maoists-65c05f5bd0d1c>); Raj, V. Chhattisgarh: Three Naxals including two female killed in encounter with security forces, Search ops underway. *The Daily Jagran*, 20 January 2024, (<https://www.thedailyjagran.com/india/chhattisgarh-three-naxals-including-two-female-killed-in-encounter-with-security-forces-search-ops-underway-10128444>).

⁴² See Table 2, page 33 of in *Violation of Civil and Political Rights of Indigenous Peoples in India, Forum Against Corporatization and Militarization, Foundation The London Story, International Solidarity with Academic Freedom in India (InSAF India), India Justice Project and London Mining Network*, p. A99. Submitted to the UN Human Rights Committee for India's ICCPR review (2024), (https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCCPR%2FCSS%2FIND%2F58549&Lang=en) (2024); Mishra, R. Bijapur encounter faked, say Maoists; police deny charge. *Hindustan Times* 30 March 2024 (<https://www.hindustantimes.com/india-news/bijapur-encounter-faked-say-maoists-police-deny-charge-101711738533427.html>).

⁴³ Shantha, S. A rebel's journey: Gumudavelli Renuka's life and death in the Maoist movement, *The Wire*, 5 April 2025 (<https://thewire.in/rights/a-rebels-journey-gumudavelli-renukas-life-and-death-in-the-maoist-movement>).

⁴⁴ Raman, S. Those killed include innocents, say Adivasis of recent anti-Naxal operation in Bastar. *BehanBox* 18 April 2024 (<https://behanbox.com/2024/04/18/those-killed-include-innocents-say-adivasis-of-recent-anti-naxal-operation-in-bastar/>); Subramaniam, M. Dead 'Maoist' talking: The aftermath of a security operation in Chhattisgarh, *Scroll.in*, 31 July 2024 (<https://scroll.in/article/1071347/dead-maoist-talking-the-aftermath-of-a-security-operation-in-chhattisgarh>).

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