
ASYMMETRIC FEDERALISM AND TRIBAL AUTONOMY IN MIZORAM: A CONSTITUTIONAL ANALYSIS OF ARTICLE 371G

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ABSTRACT

The constitutional framework for the State of Mizoram appears to reflect a distinctive approach to the management of diversity at the regional level, as well as the management of indigenous practices, as reflected more broadly throughout the framework of the Constitution of India. While acknowledging the authority of the larger framework, the inclusion of Article 371G of the Indian Constitution and the institutional framework reflected throughout the Sixth Schedule of the Indian Constitution seem to reflect an attempt to protect the customs, land, and social structures of the Mizo people.

This was done as part of the constitutional and political framework for the transition to the State of Mizoram.

This paper seeks to explore the constitutional design and the practical operation of these provisions in order to evaluate the extent to which they facilitate the achievement of tribal autonomy within the context of the Indian Constitution. Through a doctrinal analysis of the provisions of the constitution, the relevant legislation, and the institutional structures, the study seeks to evaluate the interface of tribal autonomy and the principles of constitutional supremacy. This includes the role of autonomous institutions, the reach of the relevant legislative provisions protecting customary law and land ownership, and the relevant constitutional restraints on the operation of these provisions.

The paper contends that the constitutional regime that is applicable in Mizoram does not establish a regime of absolute autonomy but, rather, a regime of structured autonomy, wherein the institutions that have been established by the tribals have substantial powers in relation to those matters that have an association with customary law, although these powers are still located within the overarching regime of constitutional governance. As such, it is submitted that this analysis would also be relevant in the broader context of discussing the regime of asymmetric federalism and indigenous self-governance that is located within the Indian constitutional matrix.

Keywords:

Article 371G; Sixth Schedule; Tribal Autonomy; Asymmetric Federalism; Mizoram; Indigenous Governance.

I. INTRODUCTION

When it comes to managing diversity within the federal system, India's constitutional framework demonstrates a very distinctive pattern. In fact, the Indian Constitution's founders were aware that a comparable constitutional framework would not be able to handle the complexity of the nation's many regions. As a result, the Indian Constitution has several clauses pertaining to asymmetric federalism, in which several states have been given preferential treatment to maintain their social and cultural identities.

One of the most significant examples of such asymmetry is the provisions of Article 371G, which offers special constitutional protection to the state of Mizoram. This article guarantees that the Mizoram Legislative Assembly must approve any parliamentary legislation pertaining to religious or social practices, customary laws and procedures, the administration of civil and criminal justice in compliance with customary laws, and land ownership or alienation. The political agreement that resulted in Mizoram's establishment as a sovereign state in 1987 led to the inclusion of these clauses in the constitution.

In addition to Article 371G, the Sixth Schedule of the Indian Constitution allows for the creation of autonomous district councils in several tribal regions of Northeast India, which have been giving the indigenous people some autonomy. The Indian Constitution's provisions thus demonstrate an effort to balance the ideas of ethnic, cultural, and regional sovereignty with the principles of national integration.

Another role of the judiciary has been the interpretation of the application of these provisions. Decisions like the case of *Samatha v. State of Andhra Pradesh*¹ are a reflection of the commitment to the rights of the tribals as provided for by the Constitution to prevent exploitation of tribal lands and resources. These are the interpretations of the application of the provisions on tribal autonomy in the Indian judicial system.

This paper seeks to examine the constitutional regime applicable to tribal autonomy in Mizoram with special reference to Article 371G and the Sixth Schedule. Through a doctrinal

¹ *Samatha v. State of Andhra Pradesh*, (1997) 8 SCC 191.

method of analysis of constitutional provisions, court decisions, and scholarly writings, the paper seeks to assess the relevance of asymmetric federalism in safeguarding tribal identity while sustaining the Indian federal system. It is submitted that the constitutional regime applicable in Mizoram is an important example of the adaptability of federalism.

Research Gap

While a great deal of research has been done on the constitution's framework for tribal autonomy, most of it has primarily looked at the framework of asymmetric federalism and how the Sixth Schedule's Autonomous District Councils operate. The functioning of customary rules, the administrative structure of tribal government, and the difficulties facing the tribal governance mechanism in Northeastern India have all been the subject of some investigation. On the other hand, not much research has been done on how the Sixth Schedule and Article 371G apply to the State of Mizoram.

Existing literature appears to have considered these provisions of the constitution as individual instruments of protection without an analysis of their combined role in determining the extent of tribal autonomy within the state. Moreover, there is a lack of analysis of the role of constitutional supremacy vis-à-vis customary forms of governance and autonomous institutions in Mizoram.

By offering a specific analysis of the constitutional provisions pertaining to tribal autonomy and the ways in which the Sixth Schedule and the provisions of Article 371G shape the boundaries of tribal autonomy as part of the larger Indian constitution, the current study aims to close this information gap.

Statement of the Problem

The constitutional mechanism that provides for tribal autonomy in India is designed in a manner that it strikes an appropriate balance between the need to preserve indigenous identity, customs, and autonomy on one hand, and the overarching principles of constitutional supremacy and integration on the other. In the context of Mizoram, it is achieved by the operation of both Article 371G of the Constitution of India and the Sixth Schedule provisions.

However, despite these constitutional provisions, issues arise as to how far these provisions promote substantive tribal autonomy. Although the constitutional framework provides for the

authority of traditional institutions and autonomous district councils, these institutions still operate within a broader legal and administrative framework that is subject to the Constitution of India.

Additionally, the existence of customary laws, autonomous institutions, and constitutional provisions often creates concerns about legislative competence, administrative powers, and the safeguarding of basic human rights. The absence of clear doctrinal analysis of the interaction between Article 371G, the Sixth Schedule, and constitutional supremacy makes it essential to examine their practical application and effectiveness in facilitating tribal self-governance.

In this respect, this study will aim to assess the constitutional regime in which tribal autonomy in Mizoram is situated and evaluate the effectiveness of the mechanisms in place in meeting the objectives of the maintenance of tribal identity within the larger constitutional structure.

Research Objectives

1. To study the constitutional framework of tribal autonomy in Mizoram under Article 371G and the Sixth Schedule.
2. To study the institutional structure and functioning of Autonomous District Councils in the state.
3. To assess the extent to which constitutional mechanisms enable tribal self-governance in the context of constitutional supremacy.

Research Questions

4. How does Article 371G relate to the Sixth Schedule in determining tribal autonomy in Mizoram?
5. How far do the Autonomous District Councils help in achieving effective self-governance?
6. Is there substantive autonomy in the constitutional scheme, or is it subject to certain structural constraints of constitutional supremacy?

Research Hypothesis

It is hypothesized that the constitutional regime applicable to Mizoram creates a regime of

structured autonomy, in which indigenous institutions of indigenous governance are both recognized and protected as part of a broader constitutional hierarchy of supremacy. Although Article 371G and the Sixth Schedule provide substantial protection for tribal self-governance, their application nonetheless appears to be subject to constitutional principles of judicial review, parliamentary supremacy, and fundamental rights.

Research Methodology

This paper examines the constitutional framework on tribal autonomy in Mizoram using a doctrinal technique of legal research. A doctrinal approach to legal study is one that relies heavily on legal analysis and interpretation. The provisions of the Indian Constitution, specifically Article 371G, and the institutional architecture created by the Sixth Schedule of the Indian Constitution serve as the study's main legal sources.

In addition to constitutional and statutory provisions, the study examines judicial interpretations and administrative practices that influence the functioning of autonomous institutions within the State. Secondary sources, including academic scholarship on asymmetric federalism, tribal autonomy, and constitutional governance in Northeast India, are also considered in order to situate the constitutional framework of Mizoram within the broader discourse on federal diversity and indigenous self-governance.

Through this doctrinal analysis, the research seeks to evaluate the extent to which the constitutional provisions applicable to Mizoram facilitate meaningful tribal autonomy while remaining embedded within the broader hierarchy of constitutional governance.

II. Literature Review

Tribal autonomy in Northeast India is an issue that has been widely studied by scholars in the field of constitutional laws, political sciences, and indigenous governance. A significant part of the available literature has focused on the constitutional provisions that aim to cater to the needs of ethnic diversity without undermining the territorial integrity of the Indian nation-state.

Another study by B. L. Hansaria² is available in the academic sphere.

² B.L. Hansaria, *Sixth Schedule to the Constitution of India* (Universal Law Publishing 2010).

Hansaria suggests that the Sixth Schedule embodies a special experiment in the practice of asymmetric federalism, which grants tribal communities a measure of self-governance through the larger constitutional framework provided in the Constitution of India.

The political and administrative procedures of the Northeast Region's Autonomous District Councils have also drawn the attention of other scholars. Sanjib Baruah³, for instance, emphasizes the significance of the Sixth Schedule for the defense and advancement of tribal rights; yet, the practical exercise of autonomy is restricted for administrative and political reasons.

Studies conducted in Mizoram have also highlighted the importance of Article 371G, which has been recognized as an important provision for the protection of customary practices and local governance systems at the local level. Article 371G has restricted the application of Parliamentary legislation with regard to religious practices, social customs, customary laws, civil and criminal justice, and the ownership and transfer of land. It has been recognized that this provision has helped to strengthen the capacity of local institutions to protect their customs while being part of the national framework.

Despite these contributions, relatively little scholarly attention has been given to the interaction between Article 371G and the system of Autonomous District Councils that are part of the Sixth Schedule. Most scholarly works examine each of these institutions individually, without examining their interactions in shaping the broader structure of tribal autonomy in Mizoram.

Thus, by examining the interaction between these constitutional processes as institutions and the overall impact of all these mechanisms on the practice of tribal self-governance within the constitutional framework, this paper aims to add to the body of existing literature.

III. Constitutional Framework of Tribal Autonomy

“Tribal autonomy in the Constitution of India is part of the larger approach of the Constitution of India to the problem of social and cultural diversity in a unified approach. In the context of the areas where the indigenous population is strong in the matter of indigenous laws, the Constitution of India has made provisions that cover the autonomy of the local population while

³ Sanjib Baruah, *Durable Disorder: Understanding the Politics of Northeast India* (Oxford Univ. Press 2005).

ensuring the dominance of the Constitution of India. The approach of the Constitution of India in the context of Mizoram is largely the result of the interplay of Article 371G⁴ of the Constitution of India and the Sixth Schedule⁵ of the Constitution of India”.

The “Sixth Schedule, which establishes Autonomous District Councils with legislative, administrative, and limited judicial powers over specific subjects, particularly those on the application of customary law, the administration of land, etc., is one of the earliest attempts to give the tribal people of some parts of North-Eastern India some degree of self-governance”. As a result, these District Councils are established within the state and federal constitutions with the goal of facilitating some degree of local self-governance. In order to preserve indigenous law and society, the Constitution acknowledges the necessity of some institutional autonomy.

The Constitution (Fifty-Third Amendment) Act, 1986⁶ included Article 371G, which strengthens the Mizoram constitutional structure even if the Sixth Schedule applies to some tribal tracts in the Northeast. It should be mentioned that the political and constitutional agreement that resulted in Mizoram becoming a fully fledged state included Article 371G. “According to Article 371G, unless the Legislative Assembly of Mizoram chooses to accept the “Act, no Act of Parliament” about any of the topics mentioned in that article shall apply to the State of Mizoram”.

“These issues include Mizo religious and social customs, customary law and procedure, the administration of criminal and civil justice in accordance with customary law, and the ownership and transfer of land and its resources”.

Thus, within the framework of the nation's constitution, Article 371G and the Sixth Schedule have created a special structure that supports tribal autonomy. The preservation of indigenous people and their institutions and the upholding of constitutional unity and governance are two components of the Constitution that the system is intended to balance. “The autonomous institutions are constrained by the basic framework of the Constitution, but they also have the authority to handle local issues in accordance with their own traditions and customs”.

⁴ INDIA CONST. art. 371G.

⁵ INDIA CONST. sched. VI.

⁶ The Constitution (Fifty-Third Amendment) Act, 1986, No. 53, Acts of Parliament, 1986 (India).

This constitutional structure is part of a larger framework of asymmetric federalism, in which various regions within the Union are accorded differing levels of autonomy based on their historical, social, and cultural circumstances. In the case of Mizoram, the interplay between Article 371G and the Sixth Schedule is an effort at sustaining indigenous forms of governance while at the same time ensuring that such autonomy is circumscribed by the supremacy of the Constitution. As such, there is no question of absolute independence in the structure of tribal institutions, but rather a structured form of autonomy that is part of a larger scheme of constitutional supremacy.

IV. Institutional Structure of Autonomy in Mizoram

Mizoram's institutional framework for tribal autonomy is the product of a number of constitutional provisions, legislative actions, and the region's long-standing political structure. In this framework, the tribal system of governance is integrated with the larger framework of the Indian constitution through a number of institutions designed to support the exercise of autonomy. The constitution's provisions are reflected in the autonomy exercised through these organisations.

One of the integral parts of such a system is the system of Autonomous District Councils provided for in the Sixth Schedule to the Constitution of India. The purpose of such a system is to confer a certain degree of autonomy on tribal people by giving them the power to control matters closely connected with their traditional institutions and methods of local government. The District Councils have legislative authority over certain matters within the areas for which they are established. Along with legislative powers, the District Councils also have administrative powers conferred upon local institutions for the conduct of development activities and administration at the district level.

The legislative powers of these councils are of particular importance with regard to issues of custom and land relations. In many tribal societies of the North-East, land ownership and use are often associated with custom and community land relations. Thus, these councils can be seen as institutional devices that enable the incorporation of custom into the formal processes of governance. At the same time, their legislative powers are subject to approval within the constitutional framework, thus reflecting the powers of the state and Union governments.

Moreover, the Supreme Court has also highlighted the importance of the protection of tribal

land and tribal governments under the constitutional framework. For instance, in the case of *Samatha v. State of Andhra Pradesh*⁷, the Supreme Court held that the transfer of tribal land to non-tribals in the scheduled areas is a violation of the protective objectives under the Constitution, although the case related to the Fifth Schedule areas.

In addition to these institutions under the Sixth Schedule, Article 371G also influences the institutional arrangement of governance in Mizoram through its provisions in the Constitution. Article 371G limits the extension of Parliamentary legislation in any particular area; therefore, it is clear that these provisions have given an important role to the Legislative Assembly of Mizoram in deciding the applicability of national legislation that may have an impact on customary practices or land management.

Thus, the institutional framework of autonomy in Mizoram works through multiple tiers of governance. At one tier, local institutions such as the Autonomous District Councils hold power over matters closely related to customary law. At another tier, the power to decide on the applicability of national legislation on matters related to customs rests with the State Legislature through the mechanism provided by Article 371G. These institutions, together, aim at ensuring that indigenous institutions of governance remain an integral part of the constitutional framework of the state.

V. Contemporary Challenges

Despite the constitutional provisions that are meant to protect tribal autonomy, the effective implementation of the framework has encountered several challenges. For instance, there are a number of inconsistencies between tribal institutions and constitutional and contemporary administrative practices, despite the fact that provisions like Article 371G of the Indian Constitution and the administration of the Sixth Schedule of the Indian Constitution are intended to protect tribal institutions.

One of the challenges that can be highlighted is related to the financial and institutional dependence of these autonomous institutions on state or Union government institutions. Although autonomous district councils have been granted legislative and administrative authority over specific local matters, their lack of financial autonomy frequently limits their ability to effectively exercise these responsibilities. Financial support for development

⁷ *Samatha v. State of Andhra Pradesh*, (1997) 8 SCC 191.

initiatives and administrative functions is often provided by state or central government funds, which can impact their autonomy. Therefore, it can be stated that autonomy is often restricted by structural challenges.

The interplay between constitutional principles and customary law, particularly with regard to matters of equality and rights, is another aspect of complexity. The Mizo social and cultural landscape is fundamentally shaped by customary law, which is protected by the constitutional framework.

However, there are certain customary laws that have the potential to conflict with emerging constitutional values, especially in relation to issues involving gender equality, property rights, and access to justice. The codification of customary law, while being in the interest of greater clarity and legal certainty, also raises questions about the extent to which customary law is willing to accommodate emerging constitutional values.

Administrative and governance issues also result from the overlapping jurisdiction of the institutions that operate within the state. The presence of state government authorities, local administration, and independent district government can create complexities that result from the overlapping layers of governance. The presence of these overlapping layers of governance can sometimes create ambiguity as regards the allocation of authority and responsibility, particularly in the areas of land management, local development, and the administration of local custom.

In addition, the changing social and economic circumstances in the state have brought about new issues in the traditional systems of governance. With the rise of urbanization, migration, and economic growth, there have been changes in land usage and social structure. This has led to concerns about the ability of traditional law to keep pace with the demands of modern governance. In such cases, the autonomous institution must deal with the challenge of cultural traditions.

These developments, therefore, underscore the fact that the constitutional setting in which tribal autonomy in Mizoram is located is one where the social and institutional setting is constantly evolving. Although the protection afforded under Article 371G and the Sixth Schedule is important, the effectiveness of these provisions in the contemporary setting will be a function of the ability to evolve and balance the challenges that arise while continuing to uphold the

imperatives of autonomy and the constitutional setting.

VI. Comparative Analysis of Autonomy Models

Article 371A and the Constitutional Framework in Nagaland

“Based on a comparative study, an analysis of the North-Eastern region’s measures for the protection of indigenous institutions has revealed both parallels and variances. The provisions for the protection of the customs and usages of the people of the State of Nagaland under Article 371A of the Indian Constitution may be superior to those for the people of Mizoram under Article 371G of the Indian Constitution”.

“Unless the Legislative Assembly of the State of Nagaland determines otherwise, no Act of Parliament pertaining to Naga religious and social practices, customary law and procedure, the administration of civil and criminal justice, or the ownership and transfer of land and its resources shall be applicable to the State”.

This is notwithstanding the fact that the same principles have been followed for the framing of Article 371G; the applicability of the same is limited to specific areas, thus creating a more specific legislative framework for the restriction of the parliamentary laws. In addition to the above-mentioned differences in the Constitution, the powers vested in the autonomous bodies in Nagaland have been interpreted as giving relatively more extensive powers in the context of the dispute resolution process. In the case of Mizoram, the judicial powers of the autonomous bodies have been closely linked with the entire judicial system of the state, with the constitutional courts of India holding the final authority.

Such distinctions also suggest that the constitutional arrangement applicable in Nagaland may grant a higher level of substantive autonomy with regard to issues of customary governance. At the same time, such autonomy may also give rise to issues of tension between customary practices and constitutional provisions, especially with regard to issues of fundamental rights. Thus, this comparison also reveals that various constitutional regimes are grappling with issues of balancing indigenous autonomy with constitutional supremacy in different ways.

B. Lessons from the Pre-2019 Constitutional Framework of Jammu and Kashmir

Another point of comparison is the constitutional provisions that, prior to their repeal in 2019,

governed the former “State of Jammu and Kashmir under Article 370 of the Indian Constitution”. The State Legislature of the State of Jammu and Kashmir has been granted a great degree of autonomy to manage things that would have otherwise been under the authority of the Parliament of India by “the provisions of the Indian Constitution that previously governed the State of Jammu and Kashmir” Compared to what is permitted under Articles 371A or 371G, this definition of asymmetry is far more expansive.

But compared to the states in the northeast, Jammu and Kashmir had a very distinct institutional structure. “Although the Sixth Schedule calls for the creation of autonomous district institutions to support local self-rule in tribal regions, Jammu and Kashmir’s constitution did not have any such institutional system”. As a result, autonomy was limited to the state government’s legislative branch.

In contrast, the Mizoram region’s constitutional architecture blends the decentralized institutional framework of the “Sixth Schedule” with the “legislative protection provided by Article 371G”. The outcome is the establishment of a framework in which local government bodies like the “Autonomous District Councils”, in addition to the state legislature, can exercise autonomy.

It could therefore be argued that the framework applicable to the region of Mizoram strikes a better balance between local self-governance and integration with the overall framework of the Indian Union.

VII. Recent Judicial Developments

Contemporary Judicial Interpretation of Sixth Schedule Autonomy

It has been judicially established that special constitutional protections of tribal regions are always subject to the broader constitutional framework. In the 1966 Supreme Court case *State of Nagaland v. Ratan Singh*⁸, the Court assessed the implementation of central criminal laws in Nagaland and concluded that the Constitution's provisions pertaining to tribal autonomy must coexist peacefully with the larger constitutional framework rather than creating a separate legal system.

⁸ *State of Nagaland v. Ratan Singh*, AIR 1967 SC 212.

The constitutional boundaries that govern tribal autonomy in the Northeast have also been clarified by recent judicial decisions. The courts are placing more stress on the idea that while constitutional provisions like Article 371G and the Sixth Schedule offer significant protection to indigenous structures, this protection must be considered in the broader context of the Constitution's supremacy.

There are judicial pronouncements with regard to the powers of autonomous institutions that reaffirmed that legislative and administrative powers vested in these institutions are subject to constitutional limitations, including judicial review principles and the safeguarding of fundamental rights. With regard to land management, environmental regulations, and traditional laws, judicial decisions sought to strike a balance between preserving indigenous institutions and conformity with national constitutional standards.

These judicial interpretations again emphasize the notion that the constitutional provisions for tribal autonomy are not of an absolute character. Rather, they are part of a defined framework wherein constitutional courts have the power to interpret and apply the extent of institutional autonomy.

Doctrinal Implications for the Concept of Structured Autonomy

This developing judicial interpretation also provides relevant clarity from a doctrinal standpoint on the notion of structured autonomy as a constitutional concept. While articles such as 371G provide legislative autonomy for the preservation of customary practices and indigenous institutions, there is no exclusion of the "application of fundamental rights or the role of the constitutional court".

Consequently, the constitutional framework for tribal autonomy should be understood to have created a system where indigenous forms of governance are recognized and supported, but still remain part of the broader hierarchy of constitutional authority. The concept of structured autonomy, therefore, is an affirmation of the continued attempt of the Indian constitutional system to balance cultural diversity with the supremacy of the Constitution.

VIII. Recommendations

Legislative and Institutional Reforms

In order to improve the efficacy of the constitutional framework for tribal autonomy, certain

legislative and institutional measures could be taken. One such aspect is the financial and administrative capacity of the “Autonomous District Councils”. Even though the latter has been entrusted with legislative and administrative powers in certain aspects of governance, its actual functioning to a large extent depends on the financial allocations from the state and central governments. It could be argued that the creation of a stable framework for the funding of such institutions could improve the efficacy of the functioning of the latter in exercising their constitutionally recognized powers.

Furthermore, additional legislative clarity on the interface between customary law and legal governance may assist in addressing any uncertainty surrounding the extent of institutional control. Thoughtfully designed legal frameworks that accommodate the role of custom and ensure consistency with constitutional imperatives may assist in bolstering the balance between self-governance and constitutional accountability.

B. Judicial and Constitutional Guidance

The advancement of jurisprudence on tribal autonomy might also be aided by increased institutional focus on the subject in the judicial system. This is because of the complexity of issues involving customary law, land issues, and constitutional protection, and it might be helpful for there to be specialised judicial consideration of these issues. This might also help in the harmonisation of customary law with the developing body of constitutional rights and principles.

In a broader context, it is important that the dialogue between constitutional institutions, state authorities, and indigenous governance systems continues in order to ensure that the goals of tribal autonomy, cultural preservation, and democratic governance remain aligned in the Indian constitutional context.

IX. Conclusion

The constitutional regime of tribal autonomy in Mizoram is a unique attempt by the Indian Constitution to balance the need to preserve tribal traditions while meeting the requirements of a single constitutional system. The Indian Constitution offers institutional measures to protect the customs of the Mizo people through the combined effect of Article 371G and the system of government outlined in the Sixth Schedule. This is a component of the Constitution’s larger

effort to use the federal system's asymmetry to solve the issue of regional diversity.

The analysis of the above provisions, which has been conducted in this paper, shows that the provisions of the constitution which apply to Mizoram do not create a system of absolute or independent self-governance. Instead, they create a system where the local authorities are given a level of autonomy over matters closely related to customary law, while still being part of the broader hierarchy of constitutional law. The legislative provisions set out in Article 371G, along with the institutional autonomy provided through the Sixth Schedule bodies, create a system where indigenous law can be continued within the system of the Constitution of India.

Yet, the exercise of this autonomy is still subject to the basic principles of the supremacy of the constitution. The parliamentary power, the jurisdiction of the constitutional court, and the general framework of the fundamental rights still set the boundaries for the exercise of the autonomous institutions. This is a paradigm of the balance struck by the constitution between the values of diversity and the integrity of the constitution.

The challenges facing the framework, such as institutional capacity, financial dependency, and the relationship between traditional principles and developing constitutional values, serve to reinforce the argument that tribal autonomy is not static, but rather it is constantly developing and changing in accordance with changing social and constitutional circumstances. To address the challenges, it is necessary for institutions and laws to be fully and thoughtfully engaged so that the constitutional principles of tribal autonomy, culture, and democratic government are fully aligned.

It is within this framework that one can understand the constitutional regime that obtains in Mizoram as being best characterized as a model of structured autonomy, in which indigenous autonomy finds support within the broader structure of constitutional supremacy. As such, this model represents the ability of the Indian constitutional model to support diversity without compromising the integrity of the broader constitutional model.

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