

**Women's Movement for Reservation in the Urban Local Bodies in Nagaland: An Analytical Review**

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**Abstract**

The reservation for women in the urban local bodies in Nagaland is one of the most contentious rights-centric issues in Northeast India. Under the leadership of the Naga Mothers' Association (NMA), the womenfolk in Nagaland make one of the most devoted and prolonged struggles to fight for the implementation of women's reservation in the urban local bodies. This paper tries to critically analyze different aspects associated with this issue of women's reservation in Nagaland. It is highlighted that the Naga women's activism for substantial space in the decision-making of the urban local bodies is an attempt to strike a greater balance between the Naga cultural values and gender equality. Since Different stakeholders invoke article 371A, an in-depth and detailed elaboration of Article 371A concerning the provision of reservation for women is tried to be given and it is highlighted that the debated provision of reservation did not violate the special autonomy for the Nagas given in the form of Article 371A of the Indian Constitution. It is stressed that the Naga women's struggle can be regarded as a case of indigenous feminism that requires special care. It is found that the growing call for gender justice within the community, and the external pressure can be utilized sensitively and cautiously to make ways for progressive change within the cultural groups.

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## **1. Introduction**

The under-representation of women in the political institutions is found in every Indian state in general and also in central legislative bodies. Different socio-political, and gender-specific aspects can be responsible for such gender disparity around the world, including Indian nation-state. Such aspects are also observable in the regional states of the Indian Union. The reservation of women in the decision-making institutions is also opposed in many areas; and the conceptual idea of reservation also carries some ambiguity. Yet, reservation in the popular discourse is considered as a modern tool to tackle the long-existed exclusion of one particular class, community, or gender in the particular spheres of life. The issue of reservation for women in the urban local bodies in Nagaland is one of the issues that reflected the tension between the women's rights, and cultural autonomy, and also between the forces of modernity and traditionalism. The movement for constitutional and basic political rights led by the women organizations in Nagaland is one of the most striking instances of women's activism for greater rights and autonomy. They showed their dissatisfaction over the systematic exclusion of women on the basis of gender; and fought for their constitutional rights. The Naga women in general were historically denied participation in the traditional decision-making bodies. Under the leadership of the Naga Mothers' Association (NMA), the apex women organization in Nagaland, the Naga women representatives emphasized the requirement of greater space for women in the decision-making bodies of Nagaland, especially in the urban local bodies. Unfortunately, this wishes of the Naga women is vehemently opposed by the Naga civil society bodies in Nagaland in different phases. Nagaland is one of

the North-eastern states of the Indian Union, dominated by the Nagas. The Nagaland state witnessed the prolonged two-decades long tussle both in support, and also in opposition to implementation of reservation of women in the modern political institutions in the form of town and municipal councils in Nagaland. The Nagas in their lifestyle and ways of life reflected the indigenous way of living. The Nagaland state since independence has been the center of secessionist claims, insurgency, and political turmoil. This issue is very much interesting for various causes. Firstly, it can be regarded as one of the most expressed women's movements for constitutional rights against a form of patriarchal interpretation of Naga culture. Secondly, it can be understood as a case of gender justice, and cultural autonomy. In Nagaland, the problem creating an obstacle to women's entry into decision-making institutions based on the fact that the tribal bodies tried to maintain gender-biased values and practices by directly opposing the state govt's decision of implementation of the women's reservation.

The Naga womenfolk in Nagaland have successfully participated in many spheres, but political decision-making traditionally remains as the exclusive domain of men. Although the customary laws of the Nagas differed considerably, the exclusion of women from the political decision-making is commonly observable in both the traditional and modern self-governing institutions in Nagaland. The underlying reasons behind such exclusion can be many. Over the opposition to implementation of the 33 per cent reservation for women in Urban Local Bodies, studies emphasized that it has led to discrimination against women (Amer, 2013; Niumai, 2015). To Renchumi Kikon Kuotsu, this legal acknowledgment and right of Naga

cultural practices left improvement of women's condition in an unfavorable position (Renchumi Kikon Kuotsu, 2018). Some studies have been done on these dynamics variously attempted to uncover the dynamic aspects behind this. To MoamenlaAmer, the barriers behind such situation include traditional continuation of patriarchal practices and values; negative role of political parties, rigid stand of Naga Hoho, and gender biased attitude of the society (Amer, 2013). ThongkholalHaokip argues that Indian state also adopted protectionist approach re-strengthening decentralized tribal form of governance where traditional institutions mostly remain untouched to considerable extend (Haokip, 2017). RenchumiKikonKuotsu and A. Wati Walling regarded the legal plurality in the form of Article 371A is contradicts over some issues, particularly issue of women's entry into political sphere" (Renchumi Kikon Kuotsu, 2018). Kham Khan SuanHausing's article "Equality as Tradition' and Women's Reservation in Nagaland" (Hausing, 2017) provides in-depth analysis of claims by both orthodox community leaders and also of supporters of women's reservation. It is pointed by author that the debated women's reservation could not be implemented because it is again the patriarchal deliberative bodies that decide on the matter. To author, the generalizing attempt to express Naga society as following egalitarianism often hides the patriarchal practices that negates equal basic rights, the emerging class division, gendered division of labour, which well subordinated women. Therefore, it can be safely said that different aspects played its part in making the political decision-making out of the general reach of women. The modern political institutions in Nagaland also did not have proper representation of the women. In such context, the turmoil over the women's reservation in Nagaland over the last two

decades showcased some very crucial dynamics concerning women's rights; cultural rights; and the role of the state.

## 2. Research Method

The research work is descriptive and analytical in nature. As the aspects analyzed in this study dealt with the recent developments that lacks many proper scientific works, the news articles as important sources of information are used in this study. This research work is a qualitative and secondary study. The data are gathered from the secondary sources. The secondary sources include edited books, journal articles, news articles etc.

## 3. The women's reservation in the urban local bodies in Nagaland: An Overview of the Prolonged Activism for Gender Justice

The Nagaland Municipal (First Amendment) Act, 2006, brings some amendments to the Nagaland Municipal Act, 2001. Along with some administrative changes, it crucially inserted Section 23A which brings the reservation of seats in Municipalities for the Scheduled Castes, scheduled Tribes, and women in accordance with the provisions contained in clauses (1) to (3) of the Article 243-T of the Indian Constitution. However, the government could not implement it immediately due to land and building tax related matters. This aims to ensure the due representation of those sections in the political decision-making bodies. As soon as the election comes nearer, the Naga tribal bodies opposed the implementation of the reservation with the argument that it violates the special cultural rights of the Nagas given under Article 371A of the Indian Constitution. There was controversy over the concept of reservation in Nagaland, which also works as a counter force against any kind of implementation of reservation. In the

midst of all such developments, all Naga women's organization, including the Naga Mothers' Association, formed a committee called "Joint Action Committee on Women Reservation" (JACWR) in 2011; and demanded the implementation of reservation. This can be regarded as the beginning of the activism for their political right by the Naga women.

**The Judicial Involvements: The different interpretations**

The women representatives of Nagaland, under the leadership of the Naga Mothers' Association (NMA) approached the Gauhati High Court on 27 June 2011. The judgment and decision of the High Court was given on 30 November 2011 in favour of the women representatives. The Single Judge Bench of the Gauhati High Court directed the respondent state i.e., Nagaland and the State Election Commission to hold elections to the Municipal and Town Councils of the state in accordance with the provision of reservation of seats for women as required under Article 243(T) of the Indian Constitution, and Section 23A of the Municipal Amendment Act, 2006. It also fixed a deadline to hold the elections. Based on this order, the Nagaland Govt declared the decision to conduct elections on 14 March 2012. A consultative meeting convened by the Nagaland CM Neiphiu Rio-led govt unanimously recommended to conduct the pending urban local bodies election with the provision of reservation. The Cabinet Committee that is formed in this connection passed a resolution against the previous High Court decision to implement the reservation and appealed the Gauhati High Court to reconsider the matter. But the violent protest starts soon after the judicial interpretation. The Nagaland govt quickly turned back to rely on the opinions of tribal bodies in reporting that no districts in Nagaland

willing to include women in elections as candidates. It became clear that the Naga civil society directly oppose the policy to implement reservation for women. In September 2012; the Legislative Assembly of Nagaland passed a resolution to exempt Nagaland from the Article 243T of the Indian Constitution, relating to women reservation. It rejected the Women Reservation Bill on the ground that Naga customary law do not allow women to participate in decision-making and justified it under Article 371A of the Constitution of India (Ao, 2019, p. 298). In such emerging line of 'consensus', the High Court Special Bench of Guwahati revoke its previous stand and defended the stand of the Legislative assembly of Nagaland that the women reservation in the town and municipal councils will not be implemented. The judgment to postpone the implementation of reservation is based on pragmatic consideration to go by the decision of the traditional interpretation of the group values, and not by the women activists. The Gauhati High Court argued that the Article 371A does not endorse clarification from the Nagaland state assembly about its stand, and that the Constitution framers wanted to ensure maximum autonomy to the Naga community. This judgment supported the decision of the Nagaland State Assembly to postpone the implementation of the women reservation in the urban local bodies. The Naga women representatives objected to this judgment; and the decision of the Legislative Assembly of Nagaland and the Nagaland Govt as the enforcement of patriarchal values in the name of protection of Naga culture. The Naga Mothers' Association also emphasizes that the decision to postpone the implementation of reservation as not relating any way to the Article 371A of the Indian Constitution. A detailed study of the reservation case, and the special autonomy for the Nagas under article

371A of the Indian Constitution also proves that the claims of women in Nagaland as reservation of women did not violate the special cultural Autonomy for the Nagas given in the form of Article 371A. They argued that the exclusion of women from the political decision-making bodies has nothing to do with the customary laws of the Nagaland and regard the systematic exclusion as necessary to change.

The Naga women representatives under the leadership of the Naga Mothers' Association (NMA) decided to challenge the decision of the Gauhati High Court in the Supreme Court. In April 2016, the Supreme Court of India had admitted a special leave petition filed by the Joint Action Committee on Women Reservation (JACWR), that challenged the constitutionality of the 2012 resolution. The women activists emphasized that the special autonomy and exemptions under Article 371A extend only to Acts of Parliament, and that the reservation flows from the Constitutional amendment (Saikia, 2017). The Supreme Court give stay order to the Gauhati High Court judgment of indefinitely postponing elections to the Municipal and the Town Councils. The Supreme Court thus ruled in favour of women's reservation. In August 2016, the apex court directed the state government to ensure 33 per cent reservation for women in the urban local bodies. In the Supreme Court judgment, the judiciary considered that the special autonomy given to the Nagas under the Article 371A of the Indian Constitution does not get violated while a case is made for reservation of women in the Urban Local Bodies. Importantly, the Supreme Court argued in favour of the reservation of women not with the direction that customary laws have to abide the gender justice norms but on the ground that the reservation of women in the municipal and town councils did not violate the special protection of the Naga customary

laws and practices. The apex court interpreted the matter of women reservation as not the case of the infringement of the right of the Nagas under Article 371A of the Indian Constitution.

The Nagaland Govt had no other option but to agree to the directive of the Supreme Court of India. The Legislative Assembly of Nagaland passed a resolution in November 2016 in which it declared the decision to conduct election with implementation of women reservation. Again, the decision of the Supreme Court is met with massive protest from the Nagas as expected. Just before the conduction of the urban local bodies election in 2017; various tribal bodies in Nagaland, including the apex body Naga Hoho, called boycott to oppose the women's reservation. The turmoil continued for around two weeks before the scheduled election that was to be held in February 2017. Despite the violent protests, the Nagaland state govt on this occasion decided to go ahead with the decision to implement 33 per cent reservation for women in the urban local bodies. The protests turned more vehement after this announcement and also lead to clashes between police and public at Dimapur where two people get killed while three gets injured. The protests then spread to different districts; gets intensified. That violence just before the urban local body elections forced the state govt to declare the process to conduct the election null and void. As protests by tribal bodies against the women's quota turned violent and the pressure from the different corners of Naga society, this time the Naga Mothers' Association (NMA) withdrew its name from the petition. After the Naga Mothers' association withdrew its name from the petition, the People's Union for Civil Liberties (PUCL) filed the petition in 2016; challenging the resolution of the Nagaland Legislative Assembly that rejects reservation of



women (Correspondent, 2022). It provided the necessary legal support. In February 2022, the Supreme Court regarded the women's reservation in the Urban Local Bodies in Nagaland as an important aspect of gender equality and bash the Nagaland state govt for delaying the elections. It gave the Nagaland govt time of six months to report back on how it proposed to implement the women's reservation. In March 2022, a consultative meeting convened by Chief Minister Neiphiu Rio-led govt unanimously recommended that the pending election to civic bodies in the state should be conducted according to the 74<sup>th</sup> Constitutional Amendment Act. The consultative meeting was attended by various stakeholders including various naga civil society organizations, and political parties. In April 2022, the Nagaland Govt informed the Supreme Court that it is ready to implement the women's reservation in the Urban Local Bodies. With that, the Supreme Court said there is no longer any impediment in holding elections to the Urban Local Bodies and directed the Nagaland Election Commission to notify the schedule for conduction of the election (Chowdhury, 2022). The consensus among the different stakeholders is evidently emerged to a certain degree in favor of the reservation of women. The years of struggle for basic political rights of taking part in the political decision-making by the women's rights activists in Nagaland finally seems to produce positive results. Importantly, it seems that the Nagas, who still maintains strict gendered social roles, internalized the cause of women's movement for greater role in the modern political decision-making, a sphere completely dominates by the male members of the Naga society. However, it is also important to note that the election is still pending till date. In July 2022, the Supreme Court again criticized the Nagaland govt for delaying the

implementation of reservation (Correspondent, 2022)

Looking at the issue of reservation only from the gender perspective also tends to restrict the overall reality concerning cultural rights. It has its own legal-political sides of the story. The recent directive of the Supreme Court to conduct municipal and town council elections with the implementation of women's reservation put pressure on the Nagaland govt to ensure the conduction of the election with reservation provision as soon as possible. The financial pressures in the form of lack of union funds to such urban bodies also created pressure on the state govt. The Supreme Court directive following the green signal from the Nagaland govt, and the financial pressures are the pragmatic factors that prepared the ground for the conduction of the ULB elections with women's reservation.

#### **4. Intra-Group Rights-centric Issues: The Observable Dynamics**

The matter not settled within the Naga society and hence, the issue of women's reservation emerged in front of the larger state mechanisms. Various form of deliberations happened between the Nagaland govt, and civil society bodies in Nagaland but unfortunately failed to generate consensus on the matter. The tribal bodies and the women representatives maintained their different views on the issue. The intra-group debate and deliberation failed to secure the aspirations of the indigenous women in Nagaland. In the case of Nagaland, the judicial machinery of the state gets involved when the constitutional rights of the women are on the stake. The larger Indian nation-state is bound to listen to the voices of the people even when the matter comes on the purview of the existing constitutional protection. It is important to highlight on some important

dynamics of the reservation spectacle. Firstly, there is a general viewpoint that the Nagas opposed the concept of reservation itself, and that it is not just about the women's reservation. However, as soon the discussion and consultation progress; it became clear that the Nagas in general opposed to the women's entry in the decision-making. As the discourse over women rights in Nagaland progressed, and the movements, deliberations, mobilizations also got intensified over the years, it became clear that a substantial section of the Naga society opposed the participation of women into the decision-making bodies. The Naga Hohovocally expressed its resentment against the reservation. To Naga Hoho, the reservation of women violates the autonomy of the Nagas. The Naga customary law exclude women from the political decision-making bodies. Despite the Naga women's activism for greater space for women in the urban local bodies in Nagaland; the tribal bodies in Nagaland remained stern in their opposition to reservation. In that way, the Patriarchal deliberations and settlement mechanisms decide the fate of women's reservation. To Hausing, these fail procedural fairness and democratic justice (Hausing, 2017). The move to supreme Court by the Naga Mothers' Association despite already shown resistance by the tribal bodies expressed the women's standpoint against the adamant tribal organizations, and bodies. It is a kind of breaking the shackles of patriarchy by the tribal women, forming a formidable case of movement for women's rights in a tribal society.

##### **5. The Reservation of Women in the Urban Local Bodies in Nagaland, and the article 371A: The Colossal Legal Scrutiny**

When the matter of women's reservation comes up, there has been talks that Article 371A gets violated in

the process, which is reflected in the narrative of the Naga tribal leaders. The constitutional shield of the Naga culture in the form of Article 371A of the Indian Constitution is closely invoked in the developments concerning reservation in Nagaland. The Nagas vehemently protests the reservation provision with the argument that this violates Article 371A of the Indian Constitution. This shield is used by the Legislative Assembly of Nagaland and is also, as mentioned above, once invoked by the Kohima Bench of the Gauhati High Court to nullify women's reservation in the urban local bodies in Nagaland. On the ground that the reservation of women went against the Naga culture, and the special autonomy of Nagaland state under Article 371A; the forces opposing the reservation of women abled to contain the genuine calls for progressive change that emerged itself from the Naga society. Article 371A of the Indian Constitution protects the religious or social practices of the Nagas, Naga customary law and procedure, administration of civil and criminal justice involving decisions according to the Naga customary law, and the ownership and transfer of land and its resources. No act of Parliament applied to the state of Nagaland in those matters without a resolution by the Legislative Assembly of Nagaland. The protection ensured under Article 371A bears important implication as the given protection left minimal ground to interfere in the internal affairs of the Nagas. It allowed the Nagas to hold considerable autonomy with the wide power of the Legislative Assembly of Nagaland and also allowed the Nagas to persevere their traditional governing institutions; and also abled to preserve the important aspects of their cultural and socio-economic importance. It provides a sort of protection to the Naga culture, traditional institutions, customary laws by giving special power to the legislative assembly of Nagaland. It recognizes a

form of Naga self-governance based on the system of special arrangement to protect the communitarian life-worlds of the Nagas.

The controversial provision of reservation of women comes up with the passing of the Nagaland Municipal Amendment Act, 2006 that amended the Nagaland Municipal Act, 2001. Importantly, it is not passed by the Union Legislature in India but by the Legislative Assembly of Nagaland. In other words, the Legislative Assembly of Nagaland passed both the Nagaland Municipal Act of 2001, and also the Nagaland Municipal Amendment Act of 2006. These are not the direct legislations or acts of the Indian Parliament. As both the original and the amended acts are acts of the Nagaland state, these acts become unrelated to the external protection ensured under the Article 371A of the Indian Constitution. As mentioned specifically under the Article 371A of the Indian Constitution, the legislative assembly of Nagaland can pass a resolution to apply the union laws, which could also have affected the different dynamics of the Naga culture. As regards the Amendment Act of 2006; the Nagaland state assembly did not pass any resolution in connection with Article 371A as the provision of reservation does not seem to fall under the subjects protected under the Article 371A of the Indian constitution. The only way to establish the relation of the provision of reservation of women with the Naga culture by its core value is to accept that the Naga society, in all forms and aspects of life, opposed the participation of women in the decision-making institutions of any kind. But as far as the 371A is concerned; the provision of reservation also does not violate the special autonomy enjoyed by the Nagas. The provision of reservation is thus at maximum can be regarded as an infringement of the Naga cultural value of keeping the women out of decision-making bodies; but it cannot be regarded

as an infringement of the article 371A of the Indian Constitution. The allegation that the Article 371A gets violated does not stand as genuine. The critical evaluation of the wordings of the Article 371A does not suggest any kind of violation of the special autonomy of the Nagaland state. Therefore, the invocation of the Article 371A of the Indian Constitution in opposition to reservation of women does not make any sense.

## **6. The Women's Rights Activism in Nagaland: A case of indigenous feminism.**

In the whole progress, the strategic position of the Naga women deserves attention. The Naga womenfolk tries to strike a greater balance between the Naga tradition, and gender justice. The call for progressive change from the community is thus observable in Nagaland. However, the Naga women's protest and activism should not be marked as their opposition to the Naga cultural values and customary laws. The Naga womenfolk pointed their dissatisfaction on one expression of cultures i.e., the systematic exclusion of them from the modern governing institutions. Historically, the Naga Mothers' Association also works towards a peaceful Nagaland state. They aimed to ensure the autonomy of the Nagas and played crucial role in the ceasefire process in the last few decades. It sticks on the importance of cultural autonomy and has shown concerns over the role of the Indian state, military on the settlement of political turmoil in Nagaland. But at the same time, they fought for the constitutional rights of women in Nagaland. They turned critical of some of the cultural practices; and a form of the interpretation of the Naga customary laws that discriminates women in important aspects of life. The leaders of the Naga Mothers' Association (NMA) strongly holds that the Naga customary laws were not threatened with reservation in modern decision-making making



institutions. In the process of their fight for the constitutional rights, the women organization in Nagaland did not attempt to attack the nature of the Article 371A and thus, did not sought to damage the cultural autonomy in the process. They gave weightage to the importance of the special provision for the Nagas for protection of the Naga identity, and the Naga societal culture. They maintained that their struggle to get greater rights and opportunities did not hamper the traditional self-governing institutions and the different customary laws of the different Naga tribes. The approach of the Naga women, as observable from the general activism of the Naga Mothers' Association (NMA); can be regarded as close to the approach of the Naga civil society bodies in the demand for protection of the special autonomy given to the state of Nagaland.

The Naga women have crucially shown that gender justice requires a form of challenging the dominant interpretation of cultural values within the group. This move from the Naga women can be regarded as the clear case of intra-group equality demands, intra-group activism. The intra-group deliberation is often projected as an important tool, especially concerning the matters within the cultural group. However, it is also necessary to admit that the Nagas internally struggled to generate consensus regarding the women's right to enjoy decision-making power in the urban local bodies in Nagaland. That is why, the external interference of the Indian nation-state can emerge as a viable option before the tribal women, as we have seen from the Nagaland case. The external interference is indeed a requirement felt in the case of the protection and promotion of women's rights in the stubborn nature of cultural interpretations. The wide believed caution that imposing external order on any culture is going to backfire and re-strengthen patriarchy in the case of Nagaland cannot be regarded as adequate

to address the demands of internal dissenters within the cultural group. The historical exclusion of women from the decision-making bodies forms the basis of the stiff, vehement opposition to reservation of women in the urban local bodies in Nagaland. The continued rejection of their claims within the cultural group led to rising demands from internal dissenters, i.e., the womenfolk in this case. Despite stern stand of the tribal bodies, and also violent protests; the Naga women shown the courage to fight for their basic autonomy to participate in the urban local bodies in Nagaland. By approaching the Supreme Court of India, they abled to pressurize the Nagaland govt in this regard. Taking this into the broader picture, this struggle by women can indeed encourage the other indigenous women to fight for their rights, by remaining within the broad confines of their culture.

## **7. The reflections of the tradition-modernity Interface in the developments concerning Reservation in Nagaland**

Among the indigenous populations around the world, including the tribal populations in the North-east India, a very clear observable dynamic is that forces of modernity face challenges in front of conservatism, and traditionalism. Any attempt to impose modernity met with call for the re-strengthening of the traditional values, traditionalism, and conservatism. The Nagas in Nagaland are not exception in this regard. Behind the protests by the tribal bodies, the continued and prolonged historical objection of the Nagas to any form of external interference on the Naga culture can be linked. The Naga customary practice of the exclusion of women from the traditional decision-making institutions played as a big hindrance to the entry of women into the modern decision-making

bodies. The Naga tribal bodies generally considered women's entry into political decision-making as against their cultural values and traditions. The fighting for some space in the decision-making bodies, though in the urban bodies, has significant value for the Naga women, who are historically denied any kind of space in the traditional self-governing institutions or bodies in Nagaland.

The Nagas reflected complex social relations, including the particular relationship that gives different social roles on the basis of gender. They maintained and recreated such social relations in which gender played an important determinant of differential social roles. Over the substantial period of time, the different Naga tribes emerged as sharing some common cultural attributes. One such expression is that in the Naga society, it is traditionally men who dominate, and control the decision-making bodies. The traditional decision-making institutions are the exclusive domain of men in Naga culture. Women also cannot inherit ancestral property in Nagaland. In general, it is evident that the Nagas in general did not allow the equal social relations without any considerations of gender. Gender emerged as an important determinant of the social and cultural symbols. The understanding of rights, and liberties can also be called as primarily shaped by such indigenous knowledge system developed over the course of time. In Naga society, the discussion of gender issues turns into justification to continue the existing order, especially the political one that protects the Naga culture (Kikon, 2017). The orthodox, and traditional elites of the cultural group sticks to the old interpretations, and traditions; much against the wishes of the intra-cultural claims of modernity. Such creates less scope for progressive changes within the society with traditional interpretation of culture, cultural values.

The internalization of modernity is also an important requirement. The reservation of women is supported by a section of the Naga civil society, especially by the women organizations in Nagaland. Although the all-male tribal bodies clearly opposed the reservation; the Naga women organizations wholeheartedly supported the reservation and fought hard for it. So, the saying that the Naga tribe in general opposed to the reservation of women does not stand tall and strong. Women forms inseparable part of any cultural group, including the Naga society that shown its own way of gender relations. Yet, the civil society bodies are comprised mostly of the male representatives of the society. The Naga Hoho is an all-men body, that plays crucial role in any decision affecting the Naga culture. Therefore, although the Nagas significantly becomes modernized after the advent of Christianity in the region during the colonial period, they still attempted to stick to some core cultural values.

The role of the Indian state in the interface between tradition and modernity is also contentious in nature. The Indian state faced challenges to accommodate the diverse cultural claims in the North-Eastern region of India, particularly from the Nagas, concentrated mostly in the state of Nagaland. Over the decades, the security-centric approach of the Indian union; and the establishment of the cultural rights basically make the nation-state; and ethno-cultural indigenous group guardians of two distinct entities, one is the territory, and the other is for the indigenous cultures. In the process, the customary value of the indigenous culture gets re-strengthened. The urge to distance the Naga culture from the interference of the central govt also hinders the call for progressive changes as evident in this case of women's reservation in the urban local bodies in Nagaland.

## 8. Conclusion

In this research work, it is also highlighted that the activism shown by the Naga women can be understood as case where women required to fight different levels of injustices. In case of Nagaland, the internal contestation shown by women in itself does not make ground for the implementation of reservation. It can be argued that gender justice requires both internal and external forces to assist. The activism for gender justice begins rather than ends with the activism shown by the Naga Mothers' Association and other women organization in Nagaland. The changes in the Naga societal values have to be introduced in such a way that proper consensus can be developed. This happened gradually after the continued pressures from different corners. The internal pressures in the form of women's activism alone did not bring progressive change. In this work, the myth that the Article 371A of the Indian Constitution gets violated by the implementation of the reservation of women in the urban local bodies in Nagaland gets debunked. This allegation makes no sense, as the Supreme Court also highlighted that Article 371A does not get violated in the implementation of reservation provision in the urban local bodies. The supreme Court ruling in favour of women reservation is one of the strongest reasons that paved the way for the success of women's activism in this regard. The external forces in the form of pressures from the Indian judiciary to enforce the provision of reservation also helped towards achieving this goal. Further, as discussed, a form of indigenous feminism can be said as emerging from the struggle for rights by the Naga women. As discussed above, the path towards women inclusive decision-making bodies is never going to be an easy one in Nagaland. It is still a long way towards greater gender justice, and gender equality in different fields of life. Yet, the activism shown by

the Naga women has to be remembered as one of the most crucial resistances against the forces of patriarchal bodies.

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