

Can Postcolonial Feminism Revive International Relations?

ARPITA CHAKRABORTY

International relations must distance itself from its Eurocentric and masculine moorings if it is to address its increasing irrelevance in the modern world and become more “international” and truly inclusive. The theoretical position of postcolonial feminism gives the discipline the best chance of doing so. The effect of conflict on women in Kashmir and the North East illustrates how a postcolonial feminist perspective enriches an understanding of the issue and enables international relations to reflect the lived reality of the people.

The modern discipline of international relations and its 20th century trajectory is presented to the newcomer in a huge number of textbooks and compilations. What is remarkably absent from international relations’ self-presentation ... is awareness of its colonial and imperial roots and contexts.

—Branwen Gruffydd Jones (2006)

What does the discipline of international relations look like from the personal perspective of a post-colonial subject living in a First World nation? The idea of the self as a subject from a developing country in the global South, of a woman with the sociocultural capital of the middle class in Indian society, informs my analysis of postcolonialism and feminism. The intersectionalities of these two schools of thought have complexities and nuances that at times distance international relations from its Eurocentric moorings, and hence the choice of postcolonialism and feminism is my attempt to understand how international relations can be unpacked and used in my own social reality.

In order to situate this theoretical understanding in praxis, I have cited the effect of conflict in postcolonial states on women. I have specifically used the examples of the situation in Kashmir and the north-eastern states in India to see how a postcolonial feminist perspective enriches the understanding of this issue, and how the use of such a perspective is imperative for international relations to evolve an understanding that mirrors the experience of the people.

Feminism and International Relations

From the critique of international relations “as a sphere of male influence and action” (Youngs 2004) rose the feminist critique of this discipline. Far removed from the lived experiences of domination, oppression and power structures of women, the traditional discourse of international relations dealt with the state as the main, if not the only, agent of international relations, thus obliterating the real life implications that concepts such as security, war and violence have on women as subjects. The inherently masculine and gendered nature of the basic tenets of the discipline meant that the perspectives of women were absent, both as actors as well as passive recipients of the repercussions of international relations across the world. With the formidable work of the first generation of feminist theorists involved in critiquing the traditional positivist rationalist approach of international relations (Tickner 1997, 2005, 2011; Moon 1997), there was a turn in international relations towards an ontological realism that reimagines the sociopolitical situations that give rise to gendered power structures. The gendered nature of power structures pervades every strata and aspect of contemporary patriarchal society, and manifests

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Arpita Chakraborty (arpita.chakraborty3@mail.dcu.ie) is a PhD candidate at the Ireland India Institute, Dublin City University.

itself in state relations, how they are constructed, and how they interact with each other. Feminist international relations theorists have, therefore, attempted to show how the inherent idea of masculinity has shaped state structures and relations; the gendered aspect of such structures in terms of the participation of women at the highest levels of interaction; and how such gendered assumptions have affected the decision-making processes, choices and perceptions, not only of international relations as a discipline, but of *realpolitik*. Western theories of universal justice have been built on a rather abstract Eurocentric concept of rationality, and based on a definition of human experience that excludes women. According to S Benhabib and D Cornell (1987), the universalism they defend is defined by identifying the experience of a special group (of elite men), as paradigmatic of human beings as a whole.

However, to say that international relations has failed to bring the perspective and experiences of women within its realm of theorisation is also to say that there is a consolidated and shared realm of such perspectives and experiences for women. While all feminist international relations theorists may agree that there are unquestioned masculine assumptions within international relations about how state structures work, there are questions to be raised about what constitutes the feminist experience. There is now a substantial body of work by international relations theorists who have shown how questioning such assumptions brings out alternative narratives and understandings of state structures and reveals how gender as a hierarchical tool works to keep the structure of the state in order (Cohn 1993; C Enloe 1990, 1993). However, epistemologically speaking, what is the experience of women? When international relations theorists talk about rethinking ideas of sovereignty, war, violence and state from the perspective of women, what do they mean? The answer to this question only partially lies in the methodological alternatives suggested by the likes of J Ann Tickner (1997), C Enloe (1993) and Marysia Zalewski and Jane Parpart (1998), and comes from earlier feminist positions of the likes of Sandra Harding (1987, 1991).

Ontological realism is a methodological tool suggested by theorists like G Youngs (2004) and supported by the works of many feminist international relations theorists. What this means is that in order for international relations to reflect the lived reality of today, it must include the gender perspective and the experience of women, while theorising on the interaction between sovereign states. By acknowledging how gender influences power relations, one of the basic concepts of interest in international relations, one can unearth how international relations affect power structures between men, between women, between men and women, and the construction of the world we live in. However, a rich body of feminist work (for example, that of Black feminism and Dalit feminism)¹ has already contested the existence of any coherent body of shared experience that women might have, based on their gender identity. In the postcolonial, globalised, neo-liberal, neo-imperial world that we inhabit, dramatic lines of separation exist between women on the basis of their race, caste, class and nationality. The behaviours of states and their interactions

with each other are inextricably linked to these factors, and in turn influence the interactions of the individual with the state. Moreover, as existing works by feminist international relations scholars have shown, there is an unbroken link between the individual's interactions with the state (with all its assumed masculine traits and ways of transaction) and the interactions between states themselves. This, then, brings in the question of how the power relations between established Western loci of power and postcolonial developing countries affect their citizens. The hierarchy of power structures established within and between states has far-reaching implications on the lives of their inhabitants, and this is most visible in the marginalised existence of those at the very bottom of such structures. Postcolonialism in this context, then, becomes a theoretical tool that helps bring to light such structures in the neo-imperial, globalised world order.

In order for the discipline to comprehend the world as it is today, with the unequal power relations and contributions of states to the global polity and economy, international relations needs a clearer perspective on how individuals contribute to their state's position. Feminist research has long since established the crucial contribution of women through housework and unorganised labour in the economy in the globalised world, especially in developing countries. Kathleen Staudt (1997) put it very succinctly when she said, "Women had little or no hand in the process of state formation or consolidation. Yet male control over women—specifically over their labour, sexuality, and reproduction—was central to laws and policies that governed the gender realm."

Intersectionality of Postcolonialism and Feminism

However, the importance of feminism is not only one of methodological accuracy and inclusion. It is a question at the heart of international relations, one that brings its practitioners head-on with the long-overdue realisation that international relations is a discipline that owes its genesis and life to imperialism, and has been feeding the same since its birth (Jones 2006). By not questioning the historical origins of unequal power relations in the international arena, international relations has chosen to be ahistorical at the expense of, one dare say, its relevance to a greater part of the "international" population. Postcolonial societies, experiencing the neo-imperial regimes of today, situate themselves in the contemporary world through their history; and so do many other groups and peoples like the Blacks in America and the Dalits in India. These groups constituted the "other" in the European imagination during colonial times, and the Eurocentric political and social theories that dominated Europe's understanding of these societies equated their culture of difference with that of regression. As John Agnew (1998) suggests,

The language of modern thought is filled with the fusion of time and space into binary distinctions between those areas that are 'ahead' or 'advanced' and those that are 'backward' or 'behind', distinctions that are also reflected in our intellectual division of labour between those who study third world development and those who study advanced capitalist states, the latter being accorded a higher status in the international relations intellectual hierarchy.

I would like to take this idea forward and try to assess the concerns voiced by many international relations experts that

incorporating such theoretical positions might compromise the core disciplinary structures of international relations.

The knowledge produced as part of international relations has contributed in significant ways to the maintenance, propagation, or sometimes destruction of the power structures in international society. As Bernard Cohn (1996), among others, has shown, knowledge has been central to the way in which the European civilisation gained and continued its hegemony in the last few centuries. This might sound banal or to some extent provocative, but international relations seems not to have taken sufficient cognisance of this fact. The discipline has been unable to comprehend until recent times the power structures within which it is situated. A cursory glance at the textbooks of international relations, as well as the dominant theories being taught in classrooms, will reveal that the discipline has not till now been able to comprehend the risk of basing the understanding of the “international” on predominantly three geographical regions: Europe, North America and, to some extent, Australia. The body of literature on which international relations builds itself primarily borrows from the political history of Europe and North America; the history, experience and interaction of the rest of the world is hardly, if ever, reflected. The implication of this is not simply the loss of nuance and complexity in understanding the “international” as it is today; it also leads to only a fragmented understanding of how that “international” came to be.

An ahistorical understanding of the contemporary world order can never lead to knowledge that can comprehend the contemporary world. If it does not feed the power structures unknowingly, it will be unable to see beyond the status quo or question it. Other disciplines had seen this coming long ago. Anthropology, for example, despite its colonial origins, has been able to shed the blinds of Eurocentric conceptions of the world and the self. The school of Subaltern Studies in Indian historiography also shows how cognisance of the postcolonial subject, in terms of power structures and how they have affected our very understanding of how power works, is another example.

Feminism has become one of the many schools of thought within international relations. While feminist international relations scholars have been trying to make the discipline aware of the inherent gender biases in its understanding of how states interact with and influence each other, the discipline as a whole is yet to sensitise itself on these ideas. The need for postcolonial feminism in the discipline, however, does not only emanate from this compartmentalisation or from a lack of representation of the postcolonial woman as a subject in the international relations discourse. Though there is a complete absence of acknowledgement of the fact that the globalised neo-liberal world of today is based on unequal power structures, with women from the developing countries at the base of the hierarchy, the need for postcolonial feminism in the discipline does not end here. Postcolonial feminism is not only representative of women in developing countries, it is a theoretical position that advocates an understanding of how the superstructures of state relations, to borrow a term from Karl Marx, have been based on the labour and social exploitation of

this subjective position. Hence, from the international relations perspective, this is not a school of thought, but an active principle that should pervade all its works, no matter from what methodological positions they come. In order to become a discipline that not only feeds the imperial and neo-imperial needs of the superpowers, but historically provides lucid understanding of world affairs from a perspective acceptable to a larger part of the world population, international relations today is in desperate need of an overhaul of its basic assumptions and world views.

Who is this body of knowledge for, after all? Who needs to understand the relations between states, and for what? How are the behaviours of states affecting the lives of people living in this world? How are the asymmetrical and hierarchical power equations propagated and continued? These are questions that will force theorists of international relations to look inward and see who raises the questions they have been answering and how these answers are helpful to them. Postcolonial feminism is a perspective from the world view of the people at the very base of the hierarchical power structure of the world, what in Indian historiography is known as the “subaltern.” Gayatri Chakravorty Spivak (2008, 2014), Chandra Talpade Mohanty (1988, 2003) and others have shown how these subjective positions can only be assumed, and how through their assumption scholars can bring in the perspective of the powerless and voiceless. This is the voice that is missing in international relations today, and it is this voice that postcolonial feminism hopes to bring to our understanding of world relations.

Two Examples from the South Asian Subcontinent

Europe, or for that matter the First World, is not facing exactly the same challenges as postcolonial nations. There might be convergences, but there are divergences as well. In postcolonial nations, the ghost of colonialism is not yet dead, and every now and then it raises its ugly head. Postcolonial nation states like India consciously try to emerge from their colonial pasts, and one of the ways has been to try and form a stable nation and not be dragged back to the days of empire. As postcolonial nations are the most recent entrants in the project of nation-making, the violence that states undergo on the way to becoming nations is very much visible in these nation states. Since these new nation-making projects have seen nations and empires failing (such as the break-up of Soviet Russia, or the separation of East and West Pakistan), they seem to get more anxious with every dissenting voice. Postcolonial India also suffers from this anxiety. Civilians are the first victims of the violence unleashed by nation-making projects in any postcolonial nation state.

Unidirectional and linear theories and world views are not always sufficient to understand every society. Likewise, to see the oppression of women in the First World and the global South as the same, and to work through the same structures would be to ignore the specificities of their different locations. In postcolonial states, the oppression of women takes a completely different turn. Women who are at the margins of these postcolonial nations, in particular, face the worst kinds of oppression. Not only do the power dynamics between men and women here lead to rape and assaults on women, but the oppression is

worsened by the power relations between the state and the subject civilian population on the margins. Here, the whole state acts as a masculine and patriarchal structure. Rape, here, is not an aberration in a fairly normal system; rather, rape is used by postcolonial states to discipline and punish the dissenting population.² It is in this light that postcolonial feminism becomes relevant in any discussion on international relations.

In order to understand the implications of feminism in international relations, let us consider a few examples of “state violence” and how it affects the lives of millions of women living in the shadow of war, violence and insecurity. Further, we will try to understand how a feminist critique of these existing masculine state structures in the postcolonial world could possibly make different nations see international relations as something dealing with people rather than abstract structures.

My examples will be from two regions of South Asia—Kashmir and North East India—which are officially described by the Government of India as “disturbed zones” (Chadha 2012). The history of these two regions since 15 August 1947 has been marred by violence against the local populations by the Indian state. In the postcolonial Indian state, the process of integration of various states into the Indian union was not a very smooth one.³ Integration seemed most tedious when it came to bringing Kashmir and the North East within the Indian union. By using various strategies, however, the Indian state finally brought these distinct regions under its domain. With the integration of Kashmir and the North East into the Indian union, there began yet another unending saga questioning the legality of this forced integration and subsequent questioning of the myth of “Akhand Bharat.”⁴

Since 1947, there has been continuous questioning in these two regions of the integration and of the absence of people’s participation in this forced marriage. The movements in these two regions—far from being monolithic and homogeneous—have been too complex in their demands and in their tactics of resistance to Indian rule. From autonomy, to plebiscite,⁵ to *azaadi* (independence), and to a questioning of the human rights violations by the Indian state, the demands of these movements have been multiple. Also, multiple have been the ways of resistance, from petitioning the Government of India, to sit-in protests, to the boycott of elections and mass mobilisations, and to armed insurrections. The response of the Indian state to all these demands has been far from democratic. In 69 years of Indian rule, the bodily violation of men and women has been most horrifying. My focus in this article will be mostly on this aspect of militarisation—bodily violation of the civilian populations of Kashmir and the North East.

Stifling Dissenting Voices

To stifle various dissenting voices coming from Kashmir and the North East, the Indian state enforced the draconian Armed Forces (Special Powers) Act (AFSPA). According to this law,

Any commissioned officer, warrant officer, non-commissioned officer or any other person of equivalent rank in the armed forces may, in a disturbed area, if he is of opinion that it is necessary so to do for the maintenance of public order, after giving such due warning as he may

consider necessary, fire upon or otherwise use force, even to the causing of death, against any person who is acting in contravention of any law or order for the time being in force in the disturbed area prohibiting the assembly of five or more persons or the carrying of weapons or of things capable of being used as weapons or of firearms, ammunition or explosive substances.⁶

AFSPA came into force in 1958 in various parts of the North East and in 1990 in various parts of Kashmir. In 2001, almost all of Kashmir was brought under its ambit. Precisely because of this act, the Indian military, which has been involved in gross human rights violations, has always found an easy escape route. Despite some criticisms of the act, even the Supreme Court in *Naga People’s Movement of Human Rights v Union of India* (27 November 1997) upheld the act as constitutional, thus giving the military almost a free hand. According to the Census of India 2011, the eight states under AFSPA in India (Assam, Manipur, Mizoram, Meghalaya, Nagaland, Tripura, Arunachal Pradesh, and Jammu and Kashmir) have 5,64,06,558 citizens. They live in a constant state of terror, with their constitutional rights threatened and their lives under perpetual risk (Kazi 2015).

There have been innumerable instances from both Kashmir and the North East where, with the unbridled power of AFSPA, the Indian military has been involved in bodily violation of civilian women. Historically, rape has been used—and continues to be used—as a weapon of intimidation and humiliation by the oppressor. It is used to crush the oppressed, both physically and psychologically. In a typical patriarchal society, more horrible than the physical violation is the psychological torture that the victim undergoes. Understanding well that civilians in Kashmir and the North East, like any other part of South Asia, associate women with the *izzat* (honour) of the family, society and region, the Indian state in several instances, in demonstrating its typical patriarchal macho nationalism, targets the woman’s body to prove its dominance.

Kunan Poshpora is one such ugly example of army brutality in Kashmir. In this case, on 23 February 1991, about 53 women in the two villages of Kunan and Poshpora in Kupwara district were allegedly raped by men of the Rajputana Rifles. The victims included minor girls, pregnant women and aged women.⁷ In September 1990, the *Illustrated Weekly of India* published a report titled “Protectors or Predators” in which they listed at least seven cases of rape from January to August 1990. In one of these cases, the article detailed, how in Kupwara town, after a crackdown, 26-year-old Rabia was caught alone by three jawans who

snatched her baby out of her arms and knocked her to the ground with their rifle butts. They then gagged her with one of her own *phirans*, tore her kurta, and raped her. One of them even pressed his boot down on her child’s chest so that he could not cry out while they were unleashing their passion. This carried on for an hour, after which she fainted. (Singh 1990)

A landmark report documenting cases of rape and other cases of human rights violations, “Alleged Perpetrators—Stories of Impunity in Jammu and Kashmir,” published by the International People’s Tribunal on Human Rights and Justice in Kashmir (IPTK), was released in December 2012. This report not only documented in full detail the various cases of rape and human rights violations, but also made public the names of

“alleged perpetrators.” Case numbers 42, 57, and 98 of this report document in detail the rape crimes against women from Kashmir. Despite these human rights reports, there has been no stopping these heinous crimes of the Indian military. Twenty-six years after the mass rapes in the villages of Kunan and Poshpora, nobody has been punished. In many other such rape cases too, the perpetrators roam free and justice evades the victims.⁸

Rape and bodily violation of women also mars the history of the North East. One of these cases was the rape and murder of Thangjam Manorama Devi on 11 July 2004. Remembering the 10th year of Manorama’s rape and murder, a statement by Women Against Sexual Violence and State Repression (wss) on 10 July 2014 noted,

Ten years ago, in the early hours of 11 July 2004, the bullet-riddled body of 32-year-old Thangjam Manorama Devi was found in Laipharok Maring of Imphal East district of Manipur. She had been picked up by the paramilitary Assam Rifles from her home in Bamon Kampu Mayai Leikai and was raped and killed. Manorama was suspected of links to an underground separatist group. Soldiers raided her home around midnight, asking the family to wait outside while they questioned her. They signed an ‘arrest memo,’ an official acknowledgement of detention, put in place to prevent ‘disappearances,’ and took her away. Later that day her semi-clad body was found in a nearby village. She had been fired (at) with several bullets. There were gunshot wounds to the genitals, and semen on her skirt, suggesting she was raped before being tortured and killed.

The army alleged that Manorama Devi was an armed insurgent working with an underground group in Manipur and that she was shot when she tried to escape from custody. However, Manorama’s family, friends, activists and various human rights organisations have repeatedly argued that Manorama was a peaceful activist who had been protesting for the removal of the draconian AFSPA from Manipur and the North East, and precisely because she was becoming an obstacle for the free reign of the army, her voice had to be stifled.

The killing of Manorama Devi led to widespread protests not only in Manipur, but in many parts of the North East and across various cities of India. The ruthlessness of the Indian security forces and the failure of the Indian government to take note of such serious human rights violations caused women from Manipur to protest the killing of Manorama Devi. On 15 July 2004, a few elderly women stood completely naked in front of the Assam Rifles headquarters with a banner saying, “Indian Army Rape Us.” Only after this protest did Manorama’s rape and murder become national news, otherwise it would have been one more case of bodily violation of a woman, brushed aside by the Indian state.

The state-sponsored violence and lack of accountability of the state in situations of escalating tension in Kashmir and the North East have repeatedly invited criticism from international organisations. Organisations, like Physicians for Human Rights, Human Rights Watch (1993, 1998, 2008) and Médecins Sans Frontières (2006), have all indicted the state on its inability to address the violence and its effect on the residents of these areas. The involvement of the international community, however, in response to one of the longest-sustaining conflict situations in the world, leaves much to be desired. “Conflict,” “territorial disputes” and “separatism” are what is highlighted

in the international domain, while the fact that so many lives have been lost in one region, and whole generations made hostage to international border disputes and forced to live in warlike situations, has been marginalised in the international discourse between states (Human Rights Watch 1998).

Gendered Structures

The Indian state, like any other, is inherently masculine and patriarchal. However, it is also different in its modus operandi, as shown above through the examples of Kashmir and the North East. Its structures are deeply gendered, so much so that in popular Indian textbooks, India is called “Bharat Mata” (Mother India) and Indian land is seen as the body of a woman, which has to be protected at any cost. Kashmir is often called the head or crown and the North East one of the arms of Mother India, and mass movements in these regions are projected, thus, as a threat to the integrity of the body of Mother India. The masculine, patriarchal state structure sees in the Kashmiri separatist movement a threat of emasculation from the Islamic other, as represented by Pakistan. Symbolism wins over real lives, and, in the process, the voices of the marginalised are subdued. The recent ruling by the Supreme Court on AFSPA, ordering a probe into 1,528 cases of alleged fake encounters in Manipur in the last 20 years (*Indian Express* 2016), provides new hope of intervention by the judicial branch of the state. The bench said,

It is high time that concerted and sincere efforts are continuously made by the four stakeholders—civil society in Manipur, the insurgents, the state of Manipur and the Government of India, to find a lasting and peaceful solution to the festering problem, with a little consideration from all quarters. It is never too late to bring peace and harmony in society.

How would the discipline of international relations understand and interpret such cases of state-sponsored gender violence in the postcolonial world? Despite some interventions made by feminism, international relations even now more or less works on the popular lines of “free trade,” “international cooperation,” “geopolitics” and “national and international security.” These ideas and structures are often projected as gender-neutral, which is far from the truth. As many feminist scholars have emphasised, these ideas and structures are, in fact, deeply masculine and patriarchal. In the name of neutrality, women—not as some abstract category, but as living bodies, flesh and blood—are often missing in the discourse. Postcolonial feminism brings to the table the specificities of the oppression of women in postcolonial nations. To ignore these specificities will be to embrace feminism as a homogeneous and monolithic discourse. It is in this light that one has to see feminist intervention in the postcolonial Indian state and international relations. Human rights organisations working in the European Union or the United States have at times tried to intervene and condemn acts of violation of women’s bodies in the name of fighting “insurgency” by the postcolonial Indian state. However, the criticism has remained limited to non-state actors.

Feminist interventions in international relations must take up the issue of bodily violation of women in India and elsewhere in such a way that it becomes a state discourse—or at least forcefully questions it—and is not limited to non-state actors

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only. Thus, when a woman is raped or tortured in such situations, governments of different nations recognise that a woman's body is being violated under the supposedly "gender neutral" garb of "national security."

Conclusions

The world portrayed by the theoretical domains of international relations reminds me ironically of a medieval map, in which most parts of the planet were still undiscovered. The decidedly colonial knowledge base that is the inheritance of the discipline of international relations is evident in every aspect of its body of thought. I started this article by positing my critique as coming from the perspective of a woman from the global South. From that perspective, this is what my understanding is: international relations needs to address urgently its relevance in "international" society in its true sense, not only as a tool for Western society to

understand their "inferiors." The theoretical position of postcolonial feminism gives it the best chance of doing so.

Postcolonial feminism is required in international relations not as an added voice of the powerless. The marginality of such voices provides a perspective of the world which, till now, has remained excluded from international relations. In order to remain relevant as a discipline in the globalised world, international relations must locate itself historically in the colonial past of Europe and reread the neocolonial present. Hence, what postcolonialism means to this discipline is not a separate school of thought, but an understanding that permeates the whole body of work. While this is easier said than done, we have the examples of other disciplines, which have successfully overcome the trap of Eurocentrism in the past. In times when postcolonial states like China and India are being projected as the next superpowers, this is an urgent task.

NOTES

- 1 Examples of such work are Sharmila Rege (2006) and Angela Davis (1981, 2003), among many others.
- 2 There is a huge body of literature on the use of rape as a weapon in conflict in feminist international relations. For an annotated bibliography, see http://genderandsecurity.org/sites/default/files/sexual_violence_and_armed_conflict_annot_bib.pdf.
- 3 For more details, see T Haokip (2012), T C Sherman (2007) and Perry Anderson (2012), among others.
- 4 Roughly translated as undivided India, this is reflected in the flag of Bharat Mata used by many right-wing organisations, which show India as comprising almost the entire subcontinent, including Bangladesh, Pakistan and Myanmar. See Ram Punyani (2004).
- 5 A plebiscite was promised to the people of Kashmir, according to UN Resolution 47, and was agreed upon by both India and Pakistan, [http://www.un.org/en/ga/search/view_doc.asp?symbol=S/RES/47\(1948\)](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/RES/47(1948)). Ironically, while India justifies its rule in Kashmir and claims majority support on the basis of the success of its voting system in parliamentary politics, this promise has not materialised to this day.
- 6 The Gazette of India Extraordinary, Part II, Section 1, Ministry of Law and Justice (Legislative Department), New Delhi, 11 September 1990, http://mha.nic.in/hindi/sites/upload_files/mhahindi/files/pdf/Armedforces_J&K_Spl.powersact1990.pdf.
- 7 A recent book, *Do You Remember Kunan Poshpora?* (Batool et al 2016) describes this case and the legal tactics of delay used by the state in detail.
- 8 This form of impunity of the armed forces is seen in other parts of the country as well, and two recent notable cases of sexual violence have been those of Soni Sori and Madkam Hidme in Chhattisgarh.

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