

Hearing the Unheard:

Climate Displacement and Tribal Justice in India

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Abstract

Surpassing the fancy lifestyles of the metro and tier-1 cities, there exists a community in the forests, their life depends on these forests, it gives them their identity, it is their home. However, the irresistible problem of climate change is slowly pushing these communities away from their homes either because of developmental activities or the changing climate. Climate change has become a global issue, but for India's tribal communities, it is posing significant threats to their lives and livelihoods. Despite the growing reality, Indian Law fails to specifically include climate induced displacement within its ambit. The legal framework is largely restricted to recognizing the problems caused by development induced displacement.

The article deeply analyses the problem by first diving into the conceptualization of displacement in the domestic legal

frameworks and the judicial position on the same. Further, to illustrate the gravity of the issue through the real world instances, several examples from India have been quoted in the study. Additionally, the effects of climate-induced displacement on the cultural heritage of the tribal communities have been discussed and to substantiate them, several examples have been covered from studies conducted in Indian tribal areas. Primarily, the importance of providing recognition to climate-induced displacement wherein various constitutional and policy reforms have been suggested with a special reference to the best international practices in this regard and what inspiration India can draw from the same to resolve the issue at the domestic level. Towards the conclusion, the article showcases how a fundamental reorientation of climate governance is the need of the hour.

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Keywords

climate-induced displacement, tribal justice, environmental policy, India

INTRODUCTION

A home is more than a physical shelter. It is a place which acts as a fixed point of existence, a place of identity, a corner that could feel safe. The idea of having a place to call home often seems simple and unquestioned. However, not everyone is fortunate enough to have this permanent space in their life. What we perceive to be a safe space still remains a dream for many. The reason for this doesn't necessarily relate to routine causes such as poverty, nor is it associated with the mainstream and the visible population of the nation. There are certain groups which still remain invisible, their problems are often overlooked and their voices often go unheard. They are miles away from the mainstream populace, they are isolated and distant, they don't reside in fancy houses or cities, they don't travel in

metros, they don't work in big corporate offices. They live in the forests, they are deeply associated with nature, forests are the major source of living for them. They are the 'Tribes' and forests are their 'homes'.

The survival of these people depends on forests². Their culture originates from these forests. It provides them with their identity. Consequently, it carries huge socio-economic and cultural value for them. Imagine, if these groups are forced to leave this space. Where will they go in such a situation? How will this affect their lives? How will they even survive? These critical questions, which are often overlooked, decide the fate of these invisible communities. The unrecognized problem of Tribal Displacement poses a serious threat to

² *To Whom Do Our Forests Belong?*, ON LIFE & WILDLIFE (Mar. 3, 2021), <https://onlifeandwildlife.com/2021/03/03/to-whom-do-our-forests-belong/> (last visited Mar. 15, 2026).

their very survival³. Notably, this has now taken the form of a broader constitutional and Human Rights concern. The nitty-gritty of the problem along with the contemporary developments taking place around it are discussed in the article further.

WHO ARE THE TRIBES?

Before understanding the problem, let us first dive into what population constitutes under the definition of the Tribe, as in, who are being referred to in the article. According to the Dictionary of Anthropology⁴ tribes may include various sub-groups such as sibs or villages and may have a leader or a common ancestor as well as a patron deity. Anthropologists such as W.J. Perry⁵

defines Tribes as a group speaking a common dialect and inhabiting a common territory. Similarly, social reformers such as Kamladevi Chattopadhyay⁶ defines a tribe as a social group a Tribe is a social group associated with a social area, dialect, cultural homogeneity and unifying social organization. There is no universally accepted definition or a fixed standard that could help identify tribes and importance may be given to different aspects or characteristics. In India, for instance, tribal populations have been defined on different bases such as geographical or regional distribution, language and ethnic roots. Having discussed what actually includes the tribal population, let us now look at what displacement is and how it is actually effected.

³ *India's Tribal Cultures: Traditions and Challenges*, MEER,

<https://www.meer.com/en/83807-indias-tribal-cultures-traditions-and-challenges> (last visited Mar. 15, 2026).

⁴ *Definition and Classification of Tribe*,

<https://ir.nbu.ac.in/server/api/core/bitstreams/9d97c9d1-74d6-4056-8d99-edfb26ff233a/content> (last visited Mar. 15, 2026)

⁵ *Climate Change and Displacement*, UNITED NATIONS HIGH COMM'R FOR REFUGEES,

<https://www.unhcr.org/what-we-do/build-better-futures/climate-change-and-displacement> (last visited Mar. 15, 2026)

⁶ Kaumudhi Challa, *Development-Induced Displacement: Legal and Human Rights Perspectives*, 73 BHARATI L. REV. 76 (2013)



CONCEPTUALIZATION OF DISPLACEMENT IN INDIAN LAW

Displacement in its very basic sense refers to a situation wherein an individual or a group is forced to leave their homes, neighborhoods or traditional lands which in turn causes breakdown of social networks, livelihoods and cultural ties. Displacement is often involuntary in nature and results in splitting communities and making people lose their cultural identities⁷. Broadly speaking, there can be two categories due to which displacement can take place– the first category is development-induced displacement and the second one is climate-induced displacement. The former one, also known as DID,⁸ is associated with the

forced relocation of people due to various large scale developmental projects such as building of dams, highways, reservoirs, mining, military installations, urbanization etc⁹. A committee was set up by the Ministry of Welfare and a policy which suggested a nationwide policy for all the affected communities including the tribal communities, forest dwellers, artisans etc. However, it took 8 long years for them to formulate a policy on project affected displacement and it was only in 2004 that a nationwide policy namely the National Policy for Resettlement and Rehabilitation¹⁰ of Project Affected Families was implemented. There are two problems which are still unaddressed which is our major source of concern. The first one being, the Policy has its own grave loopholes and secondly, it doesn't deal with climate-induced displacement.

⁷ *Climate Change and Displacement*, UNITED NATIONS HIGH COMM'R FOR REFUGEES, <https://www.unhcr.org/what-we-do/build-better-futures/climate-change-and-displacement> (last visited Mar. 15, 2026).

⁸ Kaumudhi Challa, *Development-Induced Displacement: Legal and Human Rights Perspectives*, 73 BHARATI L. REV. 76 (Oct.–Dec. 2013).

⁹ Kalim Siddiqui, *Development Induced Displacement of Rural Communities in India: A Critical Review*, 5 TURKISH ECON. REV. (2018).

¹⁰ National Rehabilitation and Resettlement Policy, 2007 (India).

Without addressing these two key-issues, the problem cannot be resolved¹¹.

The judiciary has also intervened in certain matters and have upheld the rights of the tribal people thus protecting their interests. As in the case of *Samatha v. State of Andhra Pradesh*¹², the court held that tribal land in scheduled areas cannot be transferred to private mining companies, thus emphasizing the protection of tribal land rights and self-governance. Then, in the *Orissa Mining Corporation case*¹³ as well, the court emphasized upon the Gram Sabha's decision as to whether mining violates their religious and cultural rights. This case is also known as the *Niyamgiri case* as it involved a major

decision concerning the Dongria Kondh Tribe. But these judgements are limited to development-induced displacement.

UNDERSTANDING CLIMATE INDUCED DISPLACEMENT

Climate induced displacement refers to a situation wherein forced migration is caused due to environmental and climate linked changes¹⁴. It is a result of sudden disasters such as cyclones, floods, landslides etc. or due to slow onset changes such as sea level rise, desertification, salinization, and ecosystem degradation, etc. People tend to leave their native places and shift to other safer areas in search of a stable living¹⁵.

¹¹ Midhat Fatimah, *COP29: Will India Finally Address Climate Migration?*, DEUTSCHE WELLE (Nov. 8, 2024),

<https://www.dw.com/en/cop29-will-india-finally-address-climate-migration/a-70736648> (last visited Mar. 15, 2026).

¹² *Samatha v. State of Andhra Pradesh*, (1997) 8 SCC 191

¹³ *Orissa Mining Corp. Ltd. v. Ministry of Env't & Forests*, (2013) 6 SCC 476

¹⁴ Shreya Singh, *Climate Migration and Displacement: Challenges and Responses*, INDIAN COUNCIL OF WORLD AFFS. (Feb. 21, 2024),

https://www.icwa.in/show_content.php?lang=1&level=1&ls_id=10542&lid=6710 (last visited Mar. 15, 2026).

¹⁵ Shatabdi Das, *Climate Hazards and Displacement in India*, IWM POST (2022),

<https://www.iwm.at/publication/iwmpost-article/climate-hazards-and-displacement-in-india> (last visited Mar. 15, 2026).

Climate based displacement has become much frequent in the present times because of the increasing changes in the climatic conditions throughout the world¹⁶. The current data estimates show increasing global warming levels causing threat to the ecosystem. Institutions such as the IPCC have warned of the harmful consequences of climate change and point out migration to be one of the major negative outcomes of climate change, especially in the South-Asian countries. However, at the domestic level, severe gaps exist when it comes to legal frameworks relating to climate-induced displacement.

POSITION IN THE DOMESTIC LEGAL FRAMEWORKS

In India, there are several laws relating to land acquisition, environmental protection and tribal rights, but there are no laws which specifically talk about

climate-induced displacement. Studies and data show that almost around 14 million people are affected by climate induced displacement every year and marginalized communities such as the Indian tribal groups are at the highest risk¹⁷. Yet we are not fully equipped to deal with the ever increasing risk of climate based migration.

The Indian Constitution has envisaged for the protection of Tribal Communities through various provisions such as Article 21¹⁸, which talks about the Right to life; including right to livelihood and a healthy environment; Article 14¹⁹, which talks about equality before the law; Article 46²⁰, which promotes education and economic interests of Scheduled Tribes; and Fifth Schedule²¹, which

¹⁶ Vitasta Kaul, *India's Climate Exodus Has Begun*, FRONTLINE (June 12, 2025), <https://frontline.thehindu.com/environment/climate-migration-india-floods-displacement-2024/article69686419.ece> (last visited Mar. 15, 2026).

¹⁷ Ingvild Vetthus, *Disasters Will Displace 14 Million People Every Year*, NORWEGIAN REFUGEE COUNCIL (Oct. 20, 2017), <https://www.nrc.no/news/2017/october/disasters-will-displace-14-million-people-every-year> (last visited Mar. 15, 2026).

¹⁸ INDIA CONST. art. 21.

¹⁹ INDIA CONST. art. 14.

²⁰ INDIA CONST. art. 46.

²¹ INDIA CONSTITUTION. Sched V.

extends special protection for Tribal Areas.

Indirectly, these provisions protect the interests of Tribal communities but they don't explicitly deal with climate induced displacement. We have certain statutes such as the Forest Rights Act²², 2006, the PESA Act²³, 1996, Environmental Protection Act²⁴, 1986 along with the various land acquisition laws. Yet, the problem remains the same, these laws don't recognize climate induced displacement. Resultantly, significant gaps persist with regards to legal frameworks governing and recognizing displacement based issues.

CASE STUDIES OF CLIMATE-INDUCED TRIBAL DISPLACEMENT

Various such illustrations hail from India wherein different communities from different parts of the nation have been subjected to climate induced migration. One such prominent example is the Sunderbans from West Bengal²⁵. Studies suggest that a significant portion of the population has been forced to migrate as the delta is experiencing increasing unsustainability of agriculture due to rising sea levels and frequent cyclones. This has caused significant loss to livelihood. Similarly, the Beed district of Maharashtra and the adjoining areas have been facing agrarian crisis due to recurring droughts which is further aggravated by changing climatic conditions over the years. A fraction of the population consists of the scheduled tribes (nearly 3 percent) of which almost around 80 percent of the population

²² Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006, No. 2, Acts of Parliament, 2007.

²³ Panchayats (Extension to the Scheduled Areas) Act, 1996, No. 40, Acts of Parliament, 1996 (India)..

²⁴ Environment (Protection) Act, 1986, No. 29, Acts of Parliament, 1986 (India).

²⁵ Chhaya Bhardwaj & Nabeela Siddiqui, *Climate Mobility in India: A Confused Understanding of Climate Refugees, Displacement, and Mobility*, REFUGEE L. INITIATIVE BLOG (Oct. 15, 2025), <https://rli.blogs.sas.ac.uk/2025/10/15/climate-mobility-in-india-a-confused-understanding-of-climate-refugees-displacement-and-mobility/> (last visited Mar. 15, 2026).



routinely migrate outside the village to earn their livelihood. The condition becomes worse for the children because they miss out on schools if they accompany their parents.

Identical situation rises from the Kendrapada district of Odisha²⁶. The area has been consistently struck with major cyclones and super cyclones in the last few decades, namely the Fani, Bulbul which regularly pull out people from their traditional patterns of livelihood and force them to engage in other jobs such as working in tea gardens, brick kilns, or construction sites. Data suggests that every year almost 2.5 million people migrate from Odisha²⁷. Almost one fourth of the state's population comprises the tribal people

consisting of more than 60 different categories of tribes. The tribal community is particularly vulnerable to bearing the consequences of migration.

Another such example is Almora district of Uttarakhand. Uttarakhand is one of the most disaster prone districts of the nation. Tribals and nomads from the hilly areas leave their traditional pasturelands. This has led to almost 1700 villages turning into ghost villages. Studies show that some communities such as the Van Gujjars, the Bhotiyas have permanently moved their homes to the Tarai Plains or other urban centers.²⁸ The Saharsa district of Bihar shows a similar situation. The area is the most flood-prone region in the Kosi division of Bihar. The land has become unfit for cultivation due to widespread flooding and waterlogging in the monsoon

²⁶ *Climate-Induced Displacement and Migration in India: Case Studies from West Bengal, Maharashtra, Odisha, Uttarakhand and Bihar*, CLIMATE ACTION NETWORK S. ASIA (Jan. 2021), https://cansouthasia.net/wp-content/uploads/2021/02/Migration_India_20_02_2021.pdf (last visited Mar. 15, 2026).

²⁷ Sarneswar Rao, *Tribal Displacement and Human Rights Violation in Orissa*, SOCIAL ACTION: A Q. REV. SOC. TRENDS (2005).

²⁸ *Migration in the Mountains: Why 'Progress' in Uttarakhand Is Pushing People Away*, UNITED NATIONS CHRONICLE, <https://www.un.org/en/un-chronicle/migration-mountains-why-progress-uttarakhand-is-pushing-people-away> (last visited Mar. 15, 2026).

season, depletion of groundwater table and contamination of ponds have resulted in large scale displacement of indigenous communities. Large scale displacement took place in this region around the 1950s, the displaced communities are struggling to get their allotted lands through long-pending litigations.²⁹

A common pattern could be observed from the above illustrations. The primary reason for abandoning the traditional lands is climate change. Communities in these areas largely depend on agriculture and affiliated occupations. Environmental degradation and climate change has led to reducing agricultural outputs, forcing people to look for other occupations to earn a living³⁰. Coastal areas have witnessed submerging of agricultural lands due to

rising sea levels. Sometimes people also lose their houses due to frequent flooding and choose to vacate the lands and search for new residence, a problem most commonly observed in the flood prone areas of Bihar. Similarly, hilly areas are witnessing frequent disasters of increased intensities, affecting the fragile ecosystems³¹. Temperature rise also affects the tropical rains and monsoons, forcing these communities to shift to safer economic options. The situation becomes more problematic for certain isolated communities like the Todas³², one of the indigenous communities of the Nilgiris. This is an extremely closed community, with very limited interaction with the mainstream

²⁹ G. Srihari, *Land Acquisition and Tribal Displacement in India*, 5 SHIKSHAN SANDHODHAN: J. ARTS, HUMAN. & SOC. SCI. (2022).

³⁰ Jyoti Shetty, *Loss of Tribal Land and Displacement: Impact on Women*, 3 AFRO-ASIAN J. ANTHROPOLOGY & SOC. POL'Y 71 (2012).

³¹ Vikram Aditya, *Displaced from the Hills: Livelihoods of Tribal Communities in Eastern Ghats Under Threat*, DOWN TO EARTH (Feb. 24, 2021), <https://www.downtoearth.org.in/forests/displaced-from-the-hills-livelihoods-of-tribal-communities-in-eastern-ghats-under-threat-75657> (last visited Mar. 15, 2026).

³² Osama Manzar, *Preserving Our Vanishing Tribes, Their Heritage, Language and Wisdom*, MINT (Sept. 8, 2017), <https://www.livemint.com/Opinion/AhrviHfdlAluJ6ffBBpUQN/Preserving-our-vanishing-tribes-their-heritage-language-an.html> (last visited Mar. 15, 2026).

population. Trends already show a dwindling population and the problem of displacement is further affecting their livelihood as they lack relevant skills to get employment in the outside world.

DISPLACEMENT LEADING TO VANISHING CULTURAL HERITAGE

India is a home to over 700 diverse tribal communities, each one having a distinct culture of its own. Tribal communities are deeply associated with nature and culture. The tribal culture is interwoven with forests³³. It symbolizes a sacred relation between humans and nature and is a way to respect this sacred relationship. It is most often related to worshiping nature and viewing forests as sacred entities, fulfilling every human need. One such festival being celebrated by communities in Jharkhand, Odisha

and west Bengal is the Sarhul festival³⁴. Celebrated in the Chaitra month, it signifies the worship of nature, particularly the Sal Tree and the union of the earth and the sun, which is a significant example of promoting harmony between humans and nature.

Recent government data estimates suggest that there has been a significant loss to tribal cultural heritage in India. Languages being a prime example. Of around 780 different languages being spoken by the population nationwide, 250 have been lost in the last 50 years and many have been declared as endangered by UNESCO. The tribal languages are even more difficult to preserve because they lack scripts.

The older generations also have huge repositories of traditional knowledge within themselves. They utilize various forest based resources to treat various

³³ Vidyut Joshi & Chandrakant Upadhyay, *Tribal Situation in India*, TRIBAL DIGIT. DOCUMENT REPOSITORY, <https://repository.tribal.gov.in/handle/123456789/75237> (last visited Mar. 15, 2026).

³⁴ *Sarbul*, GOV'T OF JHARKHAND, CHIEF MINISTER'S OFF., <https://cm.jharkhand.gov.in/sarbul> (last visited Mar. 15, 2026).



fatal illnesses. They pass this knowledge to their younger generations. This knowledge cannot be preserved until and unless these communities stay close to the forests. The problem of displacement is separating these indigenous communities from their native places, which is acting as a hurdle in the generational flow of indigenous knowledge too.

For instance, the oldest tribal community of India i.e. the Jarawa tribe³⁵ who hail from the islands of Andaman and Nicobar is a classic example of one such community which has tried to protect their rich cultural heritage throughout history. They are known for their isolation and resistance to connect with the outsiders in order to protect their rich culture, and to prevent the spread of certain life threatening diseases. However, even this community

has now started experiencing the impact of climate change which is posing certain socio-economic challenges for them.

RECOGNIZING CLIMATE INDUCED DISPLACEMENT IN INDIA

One of the major reasons why constitutional protections fail to protect the displacement of these communities is that the climate-induced displacement remains largely unrecognized in India³⁶. This is because courts often deal with the issue of environmental protection, but the interests of these forest based communities are largely ignored. Climate based displacement is not just a violation of the major fundamental rights of

³⁵ *Indian Tribes*, MINISTRY OF EDUC., GOV'T OF INDIA, <https://sathee.iitk.ac.in/article/social-science/indian-tribes/> (last visited Mar. 15, 2026)

³⁶ Chhaya Bhardwaj & Nabeela Siddiqui, *Climate Mobility in India: A Confused Understanding of Climate Refugees, Displacement, and Mobility*, REFUGEE L. INITIATIVE BLOG (Oct. 15, 2025), <https://rli.blogs.sas.ac.uk/2025/10/15/climate-mobility-in-india-a-confused-understanding-of-climate-refugees-displacement-and-mobility/> (last visited Mar. 15, 2026).

individuals, but also the human rights³⁷. The existing legal frameworks fail to take into account climate induced displacement as already discussed before. Some potential solutions which could be adopted are discussed below-

Developing a specific definition for climate induced displacement and integrating climate displacement into disaster management frameworks, India's National Action Plan on Climate Change (NAPCC) and environmental law frameworks can help to a greater extent in formalizing the climate related displacement norms. Setting up a dedicated National Climate Displacement Authority can also help to resolve displacement related concerns. Further, a Climate Displacement Rehabilitation Policy could be established for ensuring proper compensation to the victims,

livelihood restoration and focusing on culturally appropriate relocation for tribal communities.

Recently, India's Environmental Impact Assessment regime has also seen major shifts. Further effective additions into it can be done by making the process more transparent and inclusive. Climate Vulnerability Assessments can be done, displacement risk analysis can also be incorporated. Additionally, states may ensure Free, Prior and Informed consent (FPIC) mandatory before relocation of Tribal communities, ensuring gram sabha's consent in climate adaptation or relocation decisions can also help increasing their participation.

Some of the best international practices in this regard can be adopted in India to deal with the problem. Fiji's example can be considered for adopting a formal national Policy for climate-induced relocation³⁸. Just like Odisha, families

³⁷ Hitomi Kimura, *Addressing Climate-Induced Displacement: The Need for Innovation in International Law*, in GLOBAL ENVIRONMENTAL CHANGE AND INNOVATION IN INTERNATIONAL LAW (Neil Craik, Cameron S.G. Jefferies, Sara L. Seck & Tim Stephens eds., Cambridge Univ. Press 2018).

³⁸ Liam Moore, *Putting Principles into Practice: Lessons from Fiji on Planned Relocations*, FORCED MIGRATION REV., Issue 69 (Feb. 2022),

from several coastal villages in Fiji were being displaced due to rising sea levels and coastal erosion. Relocation was considered the last resort after exploring adaptation measures and was done only through community participation and consent after duly considering cultural and social ties of communities before relocation. A similar strategy can be adopted in India, especially for the most vulnerable areas such as Sunderbans, coastal Odisha and Himalayan areas.

The European union uses Strategic Environmental Assessment (SEA)³⁹ to evaluate environmental and social impacts of Policies before they are implemented. This procedure includes environmental risk assessments, climate vulnerability analysis and evaluation of social impacts on vulnerable communities. Establishing dedicated

institutions such as the Internal Displacement Monitoring Centre (IDMC), would improve policy planning and rehabilitation measures, thus fulfilling the void of lacking comprehensive data on climate-induced displacement.

CONSTITUTIONAL AND LEGAL POLICY REFORMS

We already have strengthened constitutional norms including Article 21, a broader interpretation to include right to environmental security, right to ecological habitat and protection from forced environmental displacement may help us further strengthen the norms. Further, strengthening tribal governance through strong enforcement of Forest Rights Act and PESA, recognition of community forest rights, ensuring free, prior and informed consent before relocation can also help to a larger extent. Further, considering a new Climate Displacement and Rehabilitation Law that provides legal recognition to displacement, providing proper

<https://www.fmreview.org/climate-crisis/moore/>. (last visited Mar. 15, 2026).

³⁹ Susanne Müller, *Strategic Environmental Assessment in EU Development Cooperation*, SWITCH TO GREEN (July 8, 2021),

<https://www.switchtogreen.eu/publications/in-eu-development-cooperation/>.

rehabilitation and compensation mechanisms, livelihood restoration programs, and engaging their participation in relocation decisions.

CONCLUSION

Climate change is the most burning issue of the present times, it is something which is irresistible and inalienable. It has the potential to cause a huge loss to humanity. Understanding the gravity of the issue, the best approach is to find solutions that serve the interest of the most marginalized too. The Tribal communities are deeply intertwined with forests, rivers, mountains and coastal areas, so much so that their identities, livelihoods and cultural practices cannot exist without the forests. However, we are highly unequipped for dealing with the major issues such as climate-based displacement, which may have a devastating impact on the lives of the tribal communities. The Indian laws continue looking at the problem largely

through the narrow lens of development which ultimately leaves the issue unrecognized. This has produced a situation of legal invisibility, where even after being vulnerable and the victims, the voices of these communities go unheard. The constitutional protections are strong, yet absence of a dedicated statute is restricting the effective realization of the protections being guaranteed by the constitution.

International climate based reports such as 'Costs of climate inaction: displacement and distress migration' emphasize that climate based displacement may result cause devastating impact to almost around 60 million people by 2050 in five south Asian countries including Bangladesh, India, Nepal, Pakistan and Sri Lanka⁴⁰. This further emphasizes the need to

⁴⁰ *Costs of Climate Inaction: Displacement and Distress Migration*, PEOPLE'S ARCHIVE OF RURAL INDIA, <https://ruralindiaonline.org/hi/library/resource/costs-of-climate-inaction-displacement-and-distress-migration/> (last visited Mar. 15, 2026).



come up with solutions that satisfy the needs of the contemporary times. Ultimately, addressing climate change requires a fundamental reorientation of climate governance and the international best practices can serve as the best inspiration for implementing solutions for climate based displacement.

