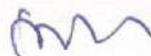


**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
		<p style="text-align: center;">BEFORE THE ODISHA HUMAN RIGHTS COMMISSION</p> <p style="text-align: center;"><u>OHRC Case No.3351 of 2023</u></p> <p>Linki Sahoo, At: Dhauragoth PS: Purunakot, Dist: Angul, Odisha ... Complainant</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.3314 of 2023</u></p> <p>Baji Nayak, At: Dhauragoth (Nua Asanbahal), PO: Tainsi, P.S.: Purunakot, Dist: Angul, Odisha ... Complainant</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.3350 of 2023</u></p> <p>Rosalini Sahu, At: Dhauragoth, Dist: Angul, Odisha ... Complainant</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer,	



ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p style="text-align: center;">Satkosia (Wildlife) Division.</p> <ol style="list-style-type: none">2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.1694 of 2025</u></p> <p>Nilakantha Sahu & Others At: Dhauragoth, PS: Jarapada, Dist: Angul, Odisha</p> <p style="text-align: center;">... Complainants</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.3473 of 2025</u></p> <p>Rekha Pradhan At: Nua Asanbahal, PO: Tainsi, P.S.: Purunakot, Dist: Angul, Odisha.</p> <p style="text-align: center;">... Complainant</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p>	

**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p style="text-align: center;"><u>OHRC Case No.3474 of 2025</u></p> <p>Bhikari Nayak & Others At: Nua Asanbahal, PO: Tainsi, P.S.: Purunakot, Dist: Angul, Odisha ... Complainants</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.3476 of 2025</u></p> <p>Panchu Nayakk & Others At: Nua Asanbahal, PO: Tainsi, P.S.: Purunakot, Dist: Angul, Odisha ... Complainants</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.2365 of 2023</u></p> <p>Santilata Naik, W/O: Lochan Naik, At: Tuluka, P.S.: Purunakot, Dist: Angul, Odisha. ... Complainant</p> <p style="text-align: center;">- Versus-</p>	

PKC

Page -3

**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar</p> <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.2510 of 2023</u></p> <p>Smt. Jema Pradhan, At: Tuluka, P.S.: Purunakot, Dist: Angul, Odisha.</p> <p style="text-align: center;">... Complainant</p> <p style="text-align: center;">- Versus-</p> <p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar</p> <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.2371 of 2024</u></p> <p>Sanjay Samal At: Paikapatnasahi, PO/PS: Narasinghpur, Dist: Cuttack, Odisha.</p> <p style="text-align: center;">... Complainant</p> <p style="text-align: center;">- Versus-</p> <p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar</p> <p style="text-align: center;">... Respondents</p>	

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**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p style="text-align: center;"><u>OHRC Case No.2374 of 2024</u></p> <p>Shakti Swarup Naik At: Banakira, PO: Khirda, P.S.: Bantala, Dist: Angul, Odisha. ... Complainant</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.2417 of 2024</u></p> <p>Puna Jani, At: Tuluka, P.S.: Purunakot, Dist: Angul, Odisha. ... Complainant</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.1591 of 2025</u></p> <p>Dola Samal & Others, At: Dhauragotha, PO: Tainsi, P.S.: Purunakot, Dist: Angul, Odisha. ... Complainants</p> <p style="text-align: center;">- Versus-</p>	

PKC

Page -5



**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar</p> <p style="text-align: center;">... Respondents</p> <p><u>OHRC Case No.3875 of 2025</u></p> <p>Antara Samal, Vill: Dinabandhupur, Ranasinghpur, P.S.: Narasinghpur, Dist: Cuttack, Odisha.</p> <p style="text-align: center;">... Complainant</p> <p style="text-align: center;">- Versus-</p> <p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar</p> <p style="text-align: center;">... Respondents</p> <p><u>OHRC Case No.2673 of 2023</u></p> <p>Pratap Sitha, Vill: Dinabandhupur, P.S.: Narasinghpur, Dist: Cuttack, Odisha.</p> <p style="text-align: center;">... Complainant</p> <p style="text-align: center;">- Versus-</p> <p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar</p> <p style="text-align: center;">... Respondents</p>	

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**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p style="text-align: center;"><u>OHRC Case No.465 of 2025</u></p> <p>Jayaram Sahu & Others At: Tikarpada, PS: Purunakot, Dist: Angul, Odisha</p> <p style="text-align: center;">... Complainants</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.4245 of 2025</u></p> <p>Mamata Pradhan, At: Katrang PO: Tikarapada, PS: Purunakot, Dist: Angul, Odisha</p> <p style="text-align: center;">... Complainant</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No. 1447 & 3180 of 2025</u></p> <p>Bharat Kumar Jani & Others, At: Baghuapal, PS: Narasinghpur, Dist: Cuttack, Odisha</p> <p style="text-align: center;">... Complainants</p> <p style="text-align: center;">- Versus-</p>	

PKC

Page -7



ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar</p> <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.1506 of 2025</u></p> <p>Mamita Pradhan, At: Nua Bhurukundi PS: Narasinghpur, Dist: Cuttack, Odisha</p> <p style="text-align: center;">... Complainant</p> <p style="text-align: center;">- Versus-</p> <p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar</p> <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.1524 of 2025</u></p> <p>Nayana Pradhan, At: Gualsahi PS: Narasinghpur, Dist: Cuttack, Odisha</p> <p style="text-align: center;">... Complainant</p> <p style="text-align: center;">- Versus-</p> <p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar</p> <p style="text-align: center;">... Respondents</p>	



**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p style="text-align: center;"><u>OHRC Case No.2749 of 2025</u></p> <p>Sitaya Pradhan, At: Guhalsahi PS: Narasinghpur, Dist: Cuttack, Odisha ... Complainant</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.2926 of 2025</u></p> <p>Tulasi Naik, C/O: Kabi Naik, At: Baguapal, PS: Narasinghpur, Dist: Cuttack, Odisha ... Complainant</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.3030 of 2025</u></p> <p>Smt. Dukhi Behera, At: Guhala Sahi, PO/PS: Narasinghpur, Dist: Cuttack, Odisha ... Complainant</p> <p style="text-align: center;">- Versus-</p>	

PKC

Page -9



**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar</p> <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.3156 of 2025</u></p> <p>Nisha Jani, At: Nandakishorepur PS: Narasinghpur, Dist: Cuttack, Odisha</p> <p style="text-align: center;">... Complainant</p> <p style="text-align: center;">- Versus-</p> <p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar</p> <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.3157 of 2025</u></p> <p>Smt. Abala Pradhan, At: Guhalsahi PS: Narasinghpur, Dist: Cuttack, Odisha</p> <p style="text-align: center;">... Complainant</p> <p style="text-align: center;">- Versus-</p> <p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar</p> <p style="text-align: center;">... Respondents</p>	



ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	<u>Contd.....</u> 09.02.2026	<p style="text-align: center;"><u>OHRC Case No.3178 of 2025</u></p> <p>Sumati & Shrimati Pradhan & Others At: Nandakishorepur, PO: Alara, PS: Narasinghpur, Dist: Cuttack, Odisha ... Complainants</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.3181 of 2025</u></p> <p>Mangulu Pradhan & Others, At: Baguapal, Ransinghpur, PS: Narasinghpur, Dist: Cuttack, Odisha ... Complainants</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.3210 of 2025</u></p> <p>Niranjan Dehury & Others, At: Guhalsahi, PS: Narasinghpur, Dist: Cuttack, Odisha ... Complainants</p> <p style="text-align: center;">- Versus-</p>	

PKC

Page -11



**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
<u>Contd.....</u> 09/02.2026		<p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar ... Respondents</p> <p><u>OHRC Case No.3211 of 2025</u></p> <p>Saroj Naik & Others, At: Baghuapal, PS: Narasinghpur, Dist: Cuttack, Odisha ... Complainants</p> <p>- Versus-</p> <p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar ... Respondents</p> <p><u>OHRC Case No.3212 of 2025</u></p> <p>Sridhar Pradhan & Others, At: Guhalsahi, PS: Narasinghpur, Dist: Cuttack, Odisha ... Complainants</p> <p>- Versus-</p> <p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division.</p> <p>2. Collector & District Magistrate, Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar ... Respondents</p>	



**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	<u>Contd.....</u> 09.02.2026	<p style="text-align: center;"><u>OHRC Case No.3213 of 2025</u></p> <p>Dillip Pradhan & Others, At: Nandakishorepur, Alara, PS: Narasinghpur, Dist: Cuttack, Odisha ... Complainants</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.3509 of 2025</u></p> <p>Sushama Pradhan, At: Balikiari PS: Jodumu, Dist: Cuttack, Odisha ... Complainant</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: center;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.3463 of 2024</u></p> <p>Pabitra Nayak & Others, At: Chhotokei, Dist: Angul, Odisha ... Complainants</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate,	

PKC

Page -13

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**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p style="text-align: center;">Angul.</p> <p>3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar ... Respondents <u>OHRC Case No.2726 of 2024</u></p> <p>Barun Kumar Bisoi & others, At/PO/PS: Purunakot, Dist: Angul, Odisha ... Complainants</p> <p style="text-align: center;">- Versus-</p> <p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division. 2. Collector & District Magistrate, Angul. 3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar ... Respondents <u>OHRC Case No.2759 of 2024</u></p> <p>Akshaya Kumar Prusty & another, At: Gopalpur, PS: Purunakot, Dist: Angul, Odisha ... Complainants</p> <p style="text-align: center;">- Versus-</p> <p>1. The Divisional Forest Officer, Satkosia (Wildlife) Division. 2. Collector & District Magistrate, Angul. 3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar ... Respondents</p>	



**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p style="text-align: center;"><u>OHRC Case No.466 of 2025</u></p> <p>Sibaram Sahu, At/PO/PS: Purunakot, Dist: Angul, Odisha</p> <p style="text-align: right;">... Complainant</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: right;">... Respondents</p> <p style="text-align: center;"><u>OHRC Case No.2626 of 2023</u></p> <p>Nabakishore Bisoi, Satkosia Abhayaranya & Praja Suraksha Samiti, Purunakot, Dist: Angul, Odisha</p> <p style="text-align: right;">... Complainant</p> <p style="text-align: center;">- Versus-</p> <ol style="list-style-type: none">1. The Divisional Forest Officer, Satkosia (Wildlife) Division.2. Collector & District Magistrate, Angul.3. Principal Chief Conservator of Forest (Wildlife) Odisha, Bhubaneswar <p style="text-align: right;">... Respondents</p> <p style="text-align: center;"><u>ORDER</u></p> <p>The present proceedings arise out of complaints filed by Shri Nabakishore Bisoi, President, Satkosia Abhayaranya & Praja Suraksha Samiti, along with other</p>	

PKC

Page -15



ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p>affected persons, questioning the legality, fairness and voluntariness of the process adopted by the State authorities for relocation of residents from certain villages situated in the buffer, fringe and ringed-out areas of Satkosia Tiger Reserve. The villages concerned include Bhurukundi, Asanbahal, Kataranga, Tuluka, Tikarapada, Gopalpur and adjoining habitations and other adjoining villages, some of which are revenue villages and some of which are forest villages are ringed out villages of Satkosia Tiger Reserve. The petitioners alleged that the relocation was carried out without free and informed consent of the Gram Sabha, without prior settlement of forest rights under the Forest Rights Act, 2006, in violation of the guidelines of the National Tiger Conservation Authority, and in a manner that resulted in arbitrary exclusion of eligible beneficiaries, inclusion of ineligible persons, inadequate compensation and severe hardship to displaced families.</p> <p>2. The Commission heard the complainant through learned counsel Shri Prasanna Kumar Behera and also heard the Principal Chief Conservator of Forests (Wildlife), District Collector, Angul, Field Director, Satkosia Tiger Reserve, Divisional Forest Officers and</p>	

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ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	<u>Contd.....</u> 09.02.2026	<p>other officials. The Commission perused the relevant records, including the Sanctuary Notification of Government of Odisha in Forest, Fisheries and Animal Husbandry Department No.4F 33/76-12727/FEAH, dtd.19th May, 1976 declaring Satkosia Gorge Sanctuary for the purpose of protecting, propagating and developing the wildlife, Government of India Notification No.8F(S)/321200612080/F&E, dtd.31.12.2007, Notification No.8F(WL)15/2018-26856, dtd.14.12.2018 of the Government of Odisha in Forest, Environment & Climate Change Department with regard to excluding some village as ringed out village from the said tiger reserve hereinafter referred to as rationalization notification of 2018, Government of Odisha Notification No.8F(WL)67/2016-12000 F&E, dtd.29.06.2016 relating to relocation of village from the Sanctuary and National Park and Tiger Reserve and Notification No.FE-WL/WLF0021-2016/12390, dtd.19.07.2021 revised guidelines issued for relocation of villages from the sanctuaries, National Park or Tiger Reserve inaccessible forest area including the area connecting wild life habitat, all the resolutions of the DLIC Meetings which is headed by the Collector & District Magistrate, Angul of which the</p>	

PKC

Page -17

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ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
Contd..... 09.02.2026		<p>D.F.O. (WL) Satkosia is the Member-Convenor, NTCA guidelines protocols for voluntary relocation inside the core and critical tiger habitat, different Gram Sabha so-called resolutions, enumeration lists disbursement details and other documents.</p> <p>3. On examination of the legal framework, the Commission observes that relocation from a core or critical tiger habitat is governed by Section 38V of the Wildlife (Protection) Act, 1972, as amended, and the guidelines issued by the NTCA. Such relocation can only be undertaken after strict compliance with statutory safeguards, including scientific assessment of irreversible damage to tiger habitat, determination that coexistence is not feasible, prior recognition and settlement of all rights under the Forest Rights Act, 2006, and obtaining free, prior and informed consent of the affected Gram Sabha. Relocation must be genuinely voluntary and based on a mutually agreed rehabilitation package.</p> <p>4. In the present case, it is not in dispute that the villages in question does not come within buffer zone but are ringed-out areas and not within the notified core or critical tiger habitat, as clarified by the rationalised notification of 2018. However, these are inside the forest. While the</p>	



ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	<u>Contd.....</u> 09.02.2026	<p>NTCA guidelines do not mandate relocation of villages from buffer/ fringe or ringed out areas, once the State Government chooses to implement a relocation programme in such areas, particularly under its own Resolution of 2016 and subsequent notification modifying the same extending relocation benefits to buffer and ringed-out villages, and also villages located in inaccessible forest stated to be done on demand of inhabitant there and in their interest, the process must still conform to constitutional safeguards, statutory requirements and principles of natural justice. Voluntariness, transparency, settlement of forest rights, valid Gram Sabha consent and fair compensation remain non-negotiable requirements.</p> <p>5. Upon consideration of the materials placed on record, the Commission finds that the relocation process in the present matter suffered from serious procedural infirmities. In several instances, relocation was initiated or completed without prior recognition and settlement of individual and community forest rights under the Forest Rights Act, 2006. The absence of such settlement strikes at the root of voluntariness and renders the consent, if any, legally infirm.</p>	

PKC

Page -19



ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	<u>Contd.....</u> 09.02.2026	<p>6. The Commission further finds that Gram Sabha meetings were either not held at all or were conducted without proper notice, without ensuring the required quorum and in a hurried manner. Many eligible adult residents were absent, and the circumstances in which resolutions were obtained do not inspire confidence as to their free and informed nature. Such defective Gram Sabha processes cannot be treated as valid consent under law.</p> <p>7. It is also evident that enumeration of beneficiaries was carried out in a non-transparent manner. Enumeration lists were not properly published, cut-off dates were fixed or extended arbitrarily without adequate publicity or ratification by the Gram Sabha, and objections were not effectively invited or considered. This resulted in exclusion of eligible persons, including married daughters, persons with disabilities and long-term residents, while in some cases ineligible persons were included without proper verification. Such arbitrariness directly affected entitlement to compensation and rehabilitation benefits.</p> <p>8. The Commission notes that compensation and ex-gratia payments were in several cases disbursed without fair and scientific valuation of houses, land, trees, livestock and livelihood assets. Inadequate compensation</p>	



**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	<u>Contd.....</u> 09.02.2026	<p>and incomplete rehabilitation support caused grave hardship to the displaced families. Relocation from one's ancestral village entails loss of home and hearth, disruption of livelihood, severance from social and cultural roots and deep psychological distress. While the creation of inviolate spaces for tiger conservation serves the greater interest of society and ecological balance, such objectives cannot be pursued by disregarding statutory safeguards and human dignity. Non-adherence to prescribed guidelines and procedures amounts to violation of human rights and has a direct bearing on denial of appropriate compensation and rehabilitation.</p> <p>9. During the course of inquiry, it has been clearly established that the procedure/protocol prescribed by the NTCA which protocols adopted and required to be followed in addition to the benefit as desired by the State Government for relocation villages outside the core or critical tiger habitat, were not followed in letter and spirit. Such non-adherence cannot be treated as a mere procedural lapse. It necessitates examination of accountability of the officers responsible for planning and executing the relocation. Where such violations attract departmental misconduct, appropriate disciplinary</p>	

PKC

Page -21

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**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p>proceedings must be initiated. Further, if the facts disclose commission of offences under any criminal law, including coercion, fabrication of records or criminal misconduct, the State Government is duty bound to proceed in accordance with law.</p> <p>10. The Commission also takes note that several affected habitations are revenue villages or contain revenue settlements. In such cases, displacement cannot be treated at par with forest villages alone. Rights under revenue laws, land records and tenancy rights must be verified, and relocation from revenue villages must be undertaken with heightened safeguards, ensuring land-based rehabilitation wherever feasible and continuity of civic amenities and livelihood support.</p> <p>11. The Commission hence, finds merit in the individual grievances raised by several affected persons, including those specifically recorded during the proceedings, whose rights and entitlements were adversely impacted due to the defective process. These grievances require immediate verification and corrective measures.</p> <p>12. In view of the above findings, the Commission recommends the Government of Odisha to constitute a High-Level Inquiry Committee within four weeks,</p>	

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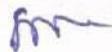
ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	<u>Contd.....</u> 09.02.2026	<p>consisting of the Secretary, Forest and Environment Department, with Secretaries of the ST & SC Development Department, Revenue & Disaster Management Department, Law Department and one independent expert having knowledge of wildlife law, the Forest Rights Act, 2006 and rehabilitation policy to be nominated by the government. Who shall head the said Committee shall be decided by the Chief Secretary to Government of Odisha. The Committee shall examine the entire relocation process village-wise relating to Satkosia Tiger Reserve except the village Raiguda which was located within the core or critical tiger habitat and relocation done since long, for which this Commission did not entertain the complaints regarding to the same. The Committee shall verify compliance with statutory provisions and guidelines, identify wrongful exclusion or inclusion of beneficiaries, assess adequacy of compensation and rehabilitation, and recommend corrective measures including payment of differential compensation, restoration of rights and livelihood support. The Committee shall also identify officers responsible for procedural violations and recommend departmental and criminal action wherever warranted. The inquiry shall be</p> <p style="text-align: right;">Page -23</p>	

PKC



**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	<p>Contd..... 09.02.2026</p>	<p>completed and a detailed report shall be submitted to the Government within six months of such constitution</p> <p>13. Pending submission of the inquiry report, no further relocation, even if described as voluntary, shall be undertaken from any buffer, fringe or ringed-out village of Satkosia Tiger Reserve unless forest rights are fully recognised and settled and a valid Gram Sabha resolution is passed with valid quorum for the same and also approval of the same from the Government of Odisha in Forest, Environment and Climate Change Department.</p> <p>14. The Chief Secretary to Government of Odisha shall report compliance on the recommendations of this Commission with regard to constitution of the Committee within six ^{weeks} months hence.</p> <p>A copy of this order be forwarded to the Chief Secretary, Government of Odisha, the Principal Secretary, Forest, Environment & Climate Change Department, the Secretary to Government of Odisha, ST & SC Development Department, the Secretary to Government of Odisha, Revenue & Disaster Management Department, the Secretary to Government of Odisha, Law Department, the Principal Chief Conservator of Forests (Wildlife), Odisha, Collector & District Magistrate, Angul, Divisional</p>	

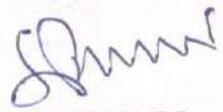
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**ODISHA HUMAN RIGHTS COMMISSION
ORDER SHEET**

Case No. _____ of 20 _____

Name of the Complainant _____

Sl. No.	Date	Order passed by the Commission	Office action taken with date
	Contd..... 09.02.2026	<p>Forest Officer, Satkosia (Wildlife) Division for necessary action and so also the complainants.</p> <p style="text-align: center;"> JUSTICE S. PUJAHARI CHAIRPERSON</p>	
	<u>Later</u> 09.02.2026	<p>It appears that in page-24 paragraph-14 of the order dtd.09.02.2026 'six weeks' has been inadvertently reflected as 'six months'. Accordingly, in that para the word 'months' be corrected by 'weeks'. P.A. to make necessary correction in the order accordingly.</p> <p style="text-align: center;"> JUSTICE S. PUJAHARI CHAIRPERSON</p>	

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Page -25