

## Tribal Customary Inheritance and Gender Justice *Liuleh*, Women's Empowerment, and the Liangmai-Naga of Northeast India

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### Abstract

Tribal women in Northeast India experience multiple forms of marginalisation shaped by (1) gender, (2) ethnicity, (3) categorisation as Tribe, (4) geography, and (5) economic exclusion. While tribal women participate actively in social and economic life, patriarchal structures continue to prohibit them from land ownership, decision-making, and the so-called "man's job." This paper examines the Liangmai-Naga customary practice of *liuleh*, i.e., women's inheritance, and explores its role in women's empowerment. The study utilises an ethnographic approach, conducting interviews with Liangmai-Naga people. Customary laws in oral and written form are utilised in the study. The findings suggest that *liuleh* provides women the right to utilise land, economic autonomy, and socio-cultural recognitions. The study further contributes to debates on tribal women's rights and gender justice in Northeast India.

**Keywords:** *Liuleh*, Liangmai-Naga of Northeast India, Tribal customary law, Tribal women, Gender justice, Women's empowerment

### 6.0 Introduction

Tribal societies in Northeast India are often perceived as relatively egalitarian because women traditionally participate in social, economic, and community life. However, this perception

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obscures the gender inequalities within patriarchal systems. Despite tribal women's active roles in society, they are largely prohibited from land possession, decision-making, and political representation. Existing scholarship on tribal societies has given insufficient attention to the day-to-day practices of women. In particular, the role of Indigenous customary inheritance systems in shaping women's economic agency remains underexplored.

This paper addresses this gap through an examination of the Liangmai-Naga customary practice of *liuleh*, which refers to women's economic inheritance. While Liangmai-Naga customary laws allow only males to inherit ancestral land, *liuleh* provides women with certain economic rights and the possession of movable assets. Customary law allows women to access land and forest. Here, women's relationship to land is mediated through male kinship structures, through the father before marriage, the husband after marriage, and the son in widowhood. Widows are entitled to possess family or community land through inheritance rights. Likewise, widows without sons and unmarried women have the right to inherit land under customary provisions.

The study asks: how does *liuleh* function as a mechanism of women's economic rights within a customary system that has patriarchal characteristics? Drawing on ethnographic interviews, customary practices and oral tradition, the paper argues that *liuleh* operates as a system of economic liberty and social empowerment for women. *Liuleh* both accommodates and negotiates androcentric structures. Thus, the study contributes to broader debates on tribal customary law and women's rights. It also engages and advances gender justice and feminist understandings of agency in contemporary India.

## 6.1 Literature Review

Available literature on selected themes relating to the topic is reviewed.

### 6.1.1 Myth of Tribal Egalitarianism

The Liangmai-Naga community is known for collective living and shared reciprocity that shape its social life (Maisuangdibou 2022a, Thanzauva 2022 and Longchar 2012). Scholars note that tribal worldviews integrate God, land, nature, and humans as a collective oneness. This relationship emphasises sharing and collective survival (James 2006, Sharanappa, 2023, Kurian 2021 and Changkija 2018: 33–37). Within this framework, landlessness and caste-based hierarchies are absent, and community identity based on land is prioritised over individual recognitions and achievements (Maisuangdibou 2022a: 124).

This communitarian ethos contributed to the perception that tribal women enjoyed greater freedom and dignity as compared to women in caste-dominated societies or even Western societies. Furer-Haimendorf (1939: 96) famously observed that Naga women possessed a degree of freedom and social respect rarely found elsewhere in India. Similarly, Mal and Saikia (2024:1) argue that tribal societies are more egalitarian than hierarchical caste societies. Women with their own *liuchiu* (morung or dormitory) as a social institution, and the visible participation of women in agriculture, festivals, and everyday community life reinforced this view.

However, scholars caution against romanticising tribal societies as fully egalitarian. While tribal women experienced greater social involvement, they remained excluded from different social-political arenas. They do not participate in political authority, decision-making, and customary domains (James 2011 & 2017, Kire 2018:3, 7; and Buongpui 2013). Thus, the discourse of tribal egalitarianism often obscures the women's struggle and the persistence of patriarchal systems.

### *6.1.2 Gendered Exclusion in Inheritance and Power*

Despite communitarian ideals, Liangmai-Naga society remains patrilineal, with men controlling inheritance, landholding, and socio-political authority (Newmai 1998: 43 and Jamir 2011:16). This exclusion reveals the limits of tribal egalitarianism. In the broader tribal culture of Northeast India, such as the Khasi and Garo that practice a matrilineal system, political, cultural and religious authorities remain largely in the male domain (Buongpui 2013:79 & 220). This contradiction reveals the limits of tribal egalitarianism. Thus, the status of tribal women is largely limited and strictly monitored by androcentric lenses.

Newmai (1998) and Daimai (2000) both describe that the Liangmai-Naga customary law defines women's role largely to household responsibilities, agriculture, and so-called "women's jobs" shaped by customary rules (Newmai 1998:43–45 and Daimai 2000: 36–39). In the community, women play an indispensable role in its survival. Women contribute substantially to the economy but remain excluded from governance and decision-making. Moreover, the sharpest form of inequality emerges in the sphere of inheritance and land rights, where women do not inherit their family name and land. They depend on male folks for their identity and recognition (Newmai 1998: 43–44). Marriage further shifts women from their father's clan to their husband's identity, reinforcing gendered power structures (Daimai 2000: 36–39). Practices such as *liuman* (bride price) do not translate into women's ownership of property.

At the same time, scholars note that tribal women exercised limited forms of autonomy (Maisuangdibou & Chandran 2026). They engage in household management, farming, production and business activities. Furthermore, communitarian structures often provided support for vulnerable women or orphans through free services from the clan and the community as a whole (Newmai 1998: 43-45 and Miri 1991); nevertheless, such activities remained within the broader framework of gendered hierarchies.

### *6.1.3. Gaps in Scholarship on Customary Economic Practices*

Existing scholarship on tribal women is largely dominated by two narratives: (1) celebrating tribal women's relative freedom and (2) critiquing their exclusion from political and inheritance structures. While these perspectives are important, they often reduce tribal women's experiences to the binary issues of empowerment versus oppression. Much of the literature focuses on political participation of women, customary exclusion, and gender justice, while comparatively less attention has been given to women's everyday economic practices and indigenous mechanisms of self-reliance.

In the Liangmai-Naga context, one such underexplored institution is *liuleh*, a customary practice that grants spinsters rights over movable property and access to land use. Although limited in scope, *liuleh* provides women with a degree of economic power, autonomy, and the ability to produce. Women's legal rights over their economic production and maintenance. Yet the *liuleh* practice is ignored in academic discussions on tribal land rights and women's empowerment. This omission is significant because economic rights shape material security. As Virginia Woolf (2018) argued in *A Room of One's Own*, economic independence is foundational to women's freedom and selfhood, re-examining customary economic practices such as *liuleh*, therefore, opens possibilities for understanding gender justice from within. Rather than solely processing through externally imposed models of empowerment, *liuleh* opens the way for women's autonomy. This study addresses the gap by analysing *liuleh* as a gendered economic institution.

## 6.2 Theoretical Framework

This study draws on feminist anthropology (Margaret W. Conkey 2003, Don Kulick 2007), property and agency theory (Jensen and Meckling 1976), and Indigenous knowledge systems to examine the socio-cultural embeddedness of *liuleh* within Liangmai-Naga society. Feminist anthropological perspectives emphasise that women's agency must be understood within specific cultural and customary contexts rather than through universal or liberal models of empowerment. In the larger context of tribal women in India, gender relations are shaped by intersecting structures of patriarchy, ethnicity, caste or tribe category, customary law, geography, and economic marginalisation.

The study engages with Amartya Sen's capability and agency framework, which conceptualises empowerment in terms of individuals' ability to access resources, make choices, and exercise agency within given social conditions (1982, 1985 & 1997 and Crocker & Robeyns 2012). It also draws on Bina Agarwal's (2003) work on gender and property rights, which highlights the importance of women's access to property in securing economic stability, bargaining power or recognition. At the same time, the study incorporates Saba Mahmood's (2005) concept of non-liberal agency, which recognises that agency may be exercised within the system, rather than only against it.

Within this framework, *liuleh* is understood as a form of agency within a patriarchal customary system. The customary system contains internally negotiated forms of agency. Rather than understanding empowerment solely through resistance and transformation, this study examines how women negotiate their rights and dignity. The study further contributes to broader debates on Indigenous-tribal women's rights and gender justice.

## 6.3 Methodology

This study adopts a qualitative ethnographic approach to examine the customary practice of *liuleh* among the Liangmai-Naga community. Ethnography is suitable for this research as it enables an in-depth understanding of lived experiences, cultural-customary meanings, and the everyday operation of economic inheritance practices within their social context. Data were collected from 25 Liangmai-Naga people from different locations in Manipur and Nagaland between 2023 and 2024. The sample includes 19 women and 6 men, drawn from different age

groups and socio-cultural backgrounds. The sample size was considered sufficient to understand and analyse the topic where recurring ideas emerged consistently across interviews. Semi-structured questions were utilised in interviewing both in person and by telephone. The sample was intended to capture the diverse perspectives on *liuleh* and its impact on women's experiences.

The data were analysed thematically. This analysis is to identify patterns related to economic agency, inheritance practices, and gender relations. This approach enables an examination of how *liuleh* operates as a cultural system of women's agency within a patriarchal structure. Secondary sources were also used to situate the findings within broader debates on Indigenous knowledge, customary law, and gender issues.

Ethical considerations were strictly followed. All participants were informed about the purpose of the study and provided oral consent prior to interviews. Although the topic was not considered sensitive, consent was obtained for the use of names where participants agreed. To ensure clarity of common Liangmai surnames such as Newmai and Pamai, full names of interviewees are used in the text, while remaining attentive to Indigenous naming practices. The study is limited by its relatively small sample size that focuses on selected Liangmai-Naga villages, which do not fully represent wider regional or inter-tribal variations. Additionally, reliance on oral narratives may lead to interpretive bias, though triangulation with customary and secondary sources helped minimise this limitation.

## **6.4 Context: Liangmai-Naga Society & *Liuleh***

### **6.4.1 Defining *Liuleh***

The Liangmai word *liuleh* is derived from two terms: *liu* (women) and *leh* (inheritance), signifying the inheritance, property, possession, or income of women (Kenhiping Marenmai, personal communication, December 16, 2023). This customary practice is observed among the Hamai (Zeliangrong/Luangdimai) community, which includes the Inpui, Liangmai, Rongmei, and Zeme. Through *liuleh*, spinsters are granted the right to own land within the family or village-community land for farming, cultivation, agriculture, and animal husbandry for their own income. It also includes the right to possess a granary, utensils, tools, ornaments, precious goods, and other movable assets. This capital is their income, and it could be expanded with support from their families and peers (Ramwiliu Newmai, personal communication, December 14, 2023).

The practice applies to any woman who has attained puberty and is prepared for marriage. It serves as a way of managing income and resources to secure future benefits for themselves, their marriage, their husbands, and their children. More importantly, *liuleh* affirms women's rights to capital, economic participation, and self-reliance, empowering them as independent individuals with control over their own resources, rather than as dependents of their families. *Liuleh* functions simultaneously as a customary inheritance practice, a system of women's movable property rights, and a culturally recognised form of economic security.

### **6.4.2 Modern Liangmai-Naga Tribal Women**

The contemporary situation of Liangmai-Naga tribal women has become increasingly complex under the pressures of modernisation, migration, and socio-economic transformation. Their marginalisation operates both within their customary communities and in wider urban social

contexts. This marginalisation is shaped by intersecting factors such as gender, ethnicity, tribal identity or Scheduled Tribes (STs), geographical location, and economic disadvantage (Maisuangdibou & Chandran 2026). Although the majority of Liangmai-Naga women continue to depend on traditional land-based occupations such as farming and forest-related work, a growing number have migrated to cosmopolitan cities for employment in both public and private sectors. While government employment offers stability and job security, women in the unregistered private sector often remain vulnerable to exploitation, both physical and psychological abuse, and job loss.

In interviews, Siwangliu Newmai and Lydia Newmai highlighted the experiences of tribal women from Northeast India in cosmopolitan metropolises such as Delhi, Kolkata, Mumbai, and Bangalore. They noted that Liangmai-Naga women like any tribal women often face discrimination based on the above-mentioned forms, and are frequently stereotyped, objectified, and rendered vulnerable to exploitation. Therefore, the persistence of *liuleh* becomes particularly significant in contexts where tribal women experience economic and social insecurity outside their customary environments.

Despite these challenges in metropolises, many Liangmai-Naga women continue to support their families. The sacrifices of Liangmai-Naga or tribal women, which are deeply rooted in tribal values of communal responsibility that continue to shape their struggles. This worldview strongly influences contemporary women's lives, both at home and outside, guiding them to stand up for their families.

### **6.4.3 Liangmai-Naga Tribal Women and Economy**

The Liangmai-Naga tribal economy is a land-centred economy. It depends immensely on land, ecology, and natural resources for its sustenance (Longchar 2012, Sangtinuk 2004). Therefore, the people's right to land is critical for their survival, economic sustenance, social empowerment, and human dignity. The tribal worldview upholds land or nature as part of the total community. This cosmic community is not anthropocentric but cosmic and holistic (Longchar 2017, Varughese & Mukherjee 2024 and Maisuangdibou 2022). Therefore, traditionally, there is no exclusive form of private landownership that can be freely traded or sold, particularly in rural areas where customary land systems continue to operate. However, this pattern is changing in urban areas of tribal land, where land is already commercialised. According to interviews with Liangmai-Naga elders Hunibou Newmai and Kenhiping Marenmai, land for the Liangmai-Naga community is "living, dynamic, and divinely ordained for the community"; thus, it cannot be commodified. However, this traditional worldview is challenged by modern values of privatisation and commercialisation.

Liangmai-Naga existence depends largely on land and community living, but it is also determined by women's participation in economic life, as noted by Maningbamliu Marenmai and Zinkamliu Moita (personal communications, December 16, 2023; May 11, 2023). Land is invaluable in this society, and women's access to land and natural resources is crucial for the overall well-being of the community (Kendiliu Chawantingduimai, personal communication, May 15, 2023) and upheld by Ramwijnliu Marenmai (personal communication, December 16, 2023). Ramwiliu Newmai explained that women take care of the family by contributing to the economy (personal communication, December 14, 2023).

In the contemporary context, some Liangmai-Naga have also emerged as successful entrepreneurs and businesspersons (Kenplingliu Marenmai, personal communication, December 16, 2023; Silamliu Newmai, personal communication, December 21, 2024; Masenlungliu Pamai, personal communication, May 12, 2023). Despite several women reaching the top, the majority of them still depend on farming and other agricultural work. This is largely because the community continues to remain rural and agriculturally dependent (Shimray 2008: 54-64). Yet, even as women sustain the economy, and access to land. Their rights to inherit and control land remain restricted, rendering customary practices like *liuleh* crucial sites for negotiating gender justice.

Significantly, Liangmai-Naga women and land are interconnected. Earth or land has provided life, economy, and resources. Thus, separating women from land rights undermines their lives. Furthermore, it undermines their family survival, economic security, and the whole community's future. Such exclusion weakens women's social identity, security, and rights. The interconnectedness between women and land forms the socio-cultural foundation for understanding *liuleh*. The right to utilise land and natural resources creates agency through which women's rights are negotiated within the Liangmai community.

## 6.5 Findings

The findings reveal that *liuleh* functions as an important indigenous economic institution for Liangmai-Naga women. Although entrenched within patriarchal socio-cultural systems, it provides women with recognised access to movable property, productive resources, and economic participation. The data further indicate that *liuleh* operates not only through individual ownership but also through collective systems of reciprocity and communal support. At the same time, changing economic and social conditions are reshaping its meaning and practice in contemporary tribal society.

### 6.5.1 *Liuleh as Gendered Economic Capital*

The findings indicate that *liuleh* functions as a form of economic capital (Pappala 202 and Nagaraja, 2020). Every unmarried woman can possess *liuleh*. These assets include grain, livestock, ornaments, utensils, money, and other movable assets (Maningbamliu Marenmai, personal communication, 2023). Here, women are allowed to cultivate portions of their family, clan or community land, and their products belong exclusively to them. This access to land and natural space provides women with limited autonomy within the patriarchal system. These practices demonstrate that women's economic participation extends beyond domestic labour to include ownership, production, resource management, and economic contribution.

The case of Nganiliu Marenmai (1924-2011), a woman from Chiang village, Tamei, Manipur, illustrates how her *liuleh* enabled her to sustain her family and financially support her husband's education during the 1940s-50s (N. Asenliu Njuta, personal communication, 2023). Such examples reveal that *liuleh* historically enabled women to control their assets. This material power negotiates space and serves as the agency of their family sustenance and economic security.

The findings further suggest that *liuleh* contributes to women's self-reliance and entrepreneurship. Their *liuleh* or assets could be invested through local trade and commerce. Women, therefore, emerge not as dependents within the male-centric household but active economic agents. Thus, Liangmai-Naga's value of *liuleh* produces capital not only for women, but even for their family and community.

#### *6.5.2 Conditional Agency within Patriarchy*

Although *liuleh* provides women with economic rights, the findings demonstrate what Mahmood (2005) conceptualises as such agency remaining conditional within a patriarchal and patrilineal social order. Participants emphasised that women exercise exclusive authority over their *liuleh*. In this case, no family member has the right to confiscate it. Here, *liuleh* creates a limited but significant sphere of female economic ownership, control, and participation (Sen 1982 and Hicks 2002).

However, this autonomy does not translate into structural equality. Women are excluded from the inheritance of land and family immovable properties. They are also excluded from governance or political authority and decision-makings. This sphere of the domain is exclusively dominated by male-centred inheritance systems. While women actively participate in agriculture, household management, and economic production, their policy-making power largely operates through male-dominated family structures rather than through equal authority. To illustrate further, girls have the right to have a relationship with boys, but arranging marriage is considered a man's job.

At the same time, the findings indicate that *liuleh* functions as a practical mechanism of security and survival. Women are able to use, preserve, exchange, and expand their possessions independently. This process enables the women's economic stability within restrictive social conditions. *Liuleh*, therefore, reflects a multifaceted dynamic in which women experience both empowerment and limitation. It does not dismantle patriarchy, yet it creates important spaces through which women negotiate for themselves. *Liuleh* therefore provides women with economic recognition and relative autonomy.

#### *6.5.3 Collective Systems: Mawatbo and Community Support*

The findings also reveal that *liuleh* is sustained through collective systems of reciprocity and mutual assistance. Collective sharing and helping are embedded within Liangmai communal life. The practice of *mawatbo*, in which members of the same *liuchiu* (girls' dormitory) or age-group cooperate through rotational labour and reciprocal support. Moreover, family and clan members assist in establishing or expanding this asset. This shared workforce strengthens women's ability to accumulate and sustain *liuleh* over time. This collective workforce and production demonstrates community sharing in spite of individual ownership of *liuleh*.

Such collective systems reinforce solidarity and social bonding. Women support one another through shared labour. Thus, the study implies that women's economic participation is deeply rooted in Indigenous-tribal communitarian relationships and mutual dependence. Women's ability to use community land and forest upholds these economic benefits.

#### 6.5.4 Transition and Changing Meanings of *Liuleh*

The findings further indicate that *liuleh* is undergoing a gradual transformation due to rapid modernisation and globalisation. There is growing urbanisation, education, migration, and changing economic aspirations that affect Liangmai-Naga women and the community at large. Traditionally, *liuleh* was closely connected to agrarian or communal land systems and subsistence-based economies. However, younger generations increasingly engage with urban employment, wage-based economies, formal education, and modern property relations that differ significantly from traditional village life. Today, many women have migrated to cities seeking jobs and employment.

Consequently, older forms of *liuleh* centred on grain storage, livestock, and subsistence production are gradually changing in both meaning and practice. Today, the *liuleh* economy is replaced by money capital. Nevertheless, the findings suggest that *liuleh* continues to retain symbolic and practical significance as a customary institution that affirms women's economic rights, self-reliance, and social recognition. Even amidst socio-economic transformation, *liuleh* remains an important cultural mechanism through which women negotiate identity, livelihood security, and gendered belonging within the community.

### 6.6 Discussion

The findings demonstrate that *liuleh* impedes dominant assumptions about Liangmai-Naga women, property, and empowerment. Here, *liuleh* can be viewed as a counter-patriarchal mechanism within patriarchy itself. Though not fully emancipated, however, some space of autonomy is created within. Existing scholarship often portrays tribal or Liangmai-Naga women either as relatively empowered or as subordinated in male-dominated frameworks. This study demonstrates that *liuleh* acts as an intermediate or negotiated space. It suggests that women exercise economic agency in the community through owning, earning and profiting. Although constrained, *liuleh* functions as a gendered economic space. It reveals the complex ways in which indigenous customary law functions. *Liuleh* thus represents a paradoxical form of freedom within patriarchal dominance.

#### 6.6.1 *Liuleh* and Feminist Understandings of Property

Feminist theories of property emphasise that access to economic resources is central to women's rights and dignity (Conkey 2003: 870). In this context, *liuleh* functions as an indigenous mechanism of economic security because it provides rights over movable wealth and productive resources. Many inheritance systems exclude women from ownership and control of property, however, *liuleh* creates a socially legitimate sphere through which women can exercise forms of self-reliance, resource management, and economic participation. Likewise, Liangmai-Naga urban experiences of insecurity contrast sharply with the customary *liuleh*, which provides women with a measure of economic security and social recognition within their community.

At the same time, *liuleh* is different from Western or liberal notions of ownership and property. Liangmai-Naga women's wealth is not an entirely individualistic control, but it falls within a communitarian ownership. Their access to land, though not owned, is a critical mechanism

of women's position in society. Likewise, women share workforce among themselves to expand their *liuleh* which is a collective commitment. Though women have the right over their *liuleh*, this ownership is understood through communitarian responsibilities. This suggests that women's economic agency emerges through Indigenous-tribal customary and collective frameworks rather than external paradigms.

### *6.6.2 Liuleh in Relation to Other Inheritance Systems*

Compared to dominant patrilineal inheritance systems across India, *liuleh* provides Liangmai-Naga women with relatively greater economic autonomy. This asset is women's right and authority over their own movable properties (Kelkar 2011). The study challenges the assumption that women's empowerment can be measured solely through land or immovable property. Although land ownership is significant, women's access to cultivating land, forest resources, and economic control, as outlined in Agarwal's (1992 & 1996) framework, also constitute important dimensions of agency and livelihood security. The practice of *liuleh* enables women to curtail their own autonomy and liberty within the tribal communitarian system of land sharing. In that sense, men, though they own the land, do not have absolute ownership, as tribal land is collectively owned rather than individual property.

The findings further distinguish *liuleh* from dowry systems prevalent in many parts of South Asia. In Liangmai-Naga society, *liuman*, a bride's price similar to a dowry, is paid by the man's family to the woman's family. In that sense, *liulam* (price of a bride or dowry) is paid by the man and not the woman. Whereas dowry often reinforces women's dependency within the husband's household. Women are subjected to appropriation by marital families; *liuleh* is recognised as the woman's own possession. She owns the assets according to customary authority. Participants stressed that no family member, including the husband's family, has the right to confiscate a *liuleh*. In this sense, *liuleh* functions not merely as symbolic wealth but as a source of bargaining power and economic stability within the Liangmai-Naga customary society.

### *6.6.3 Transformative Possibilities and Structural Limits*

The study further demonstrates that *liuleh* accommodates and challenges patriarchal structures. On the one hand, women continue to be excluded from inheritance of clan land and political authority. Moreover, after marriage, *liuleh* often becomes integrated into the husband's household economy, reflecting the continuing dominance of the patrilineal system. However, women's customary rights to utilise the family, clan, and community land and forestry are transformative in themselves.

Women's *liuleh* creates spaces through ownership, autonomy, and participation within customary society. Its significance lies not in challenging or dismantling patriarchy entirely but in enabling women to negotiate through it. Though *liuleh* has its limitations, it is positioned as a force to negotiate economic and cultural space for women. The *liuleh* system upholds women's ability to utilise the land, produce, market the production, and have possession over the capital, which is a critical empowerment mechanism. The findings suggest that women's agency in Liangmai-Naga society, as Mahmood (2005) delineates, operates through dynamic negotiation. Rather than producing absolute equality, *liuleh* enables negotiated forms of agency.

At the same time, participants perceived *liuleh* as more transformative than merely accommodative because it remains identified as the woman's own possession. It provides a degree of economic ownership, independence and survival capacity. The study, therefore, argues that indigenous customary practices such as *liuleh* reveal how pathways to gender justice may emerge from within tradition itself, even while remaining shaped and constrained by broader gender-hierarchical structures. Gender justice grounded in the Liangmai-Naga customary system and aligned with the broader or dominant feminist paradigm can be liberative.

## 6.7 Recommendations and Policy Implications

The study highlights the need to strengthen women's economic rights within tribal customary systems while addressing the structural inequalities that continue to limit their autonomy. Since tribal society is deeply land- and community-centred, women's access to land, resources, and economic capital must be recognised as essential not only for women's empowerment but also for the sustainability of tribal communities.

### 6.7.1 Legal Recognition of Customary Women's Rights

Customary practices such as *liuleh* should receive greater legal and policy recognition. They are indigenous forms of women's economic rights and security. Tribal development policies need to acknowledge and protect women's customary access to property, resources, and livelihood systems. Rather than relying solely on external or urban-centred models of empowerment, local-based practices should be enhanced through policy making. Such recognition is important because increasing privatisation, urbanisation, and the weakening of communal systems threaten the continuity of indigenous women's customary rights and economic self-sufficiency.

### 6.7.2 Integration with Government Welfare Schemes

Welfare and livelihood programmes of the government, such as the Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA) and the Pradhan Mantri Kisan Samman Nidhi (PM-KISAN) should be integrated with tribal women's customary economic systems (see Pellissery & Jalan 2011). Such government schemes, like *liuleh*, can be manifested in women's empowerment and economic freedom. These programmes can strengthen women's self-reliance by improving access to employment opportunities, agricultural support, credit systems, forest resources, and local markets. However, because land entitlement and formal land titles are often male-centred, policies must ensure women's direct and independent access to these benefits and resources.

### 6.7.3 Protection of Communal Land and Resource Systems

Women and land are inseparable. In that sense, protecting communal land control systems remains crucial for tribal women's empowerment and economic participation. More than anything, this shared community land provides economic space for women (Kuokkanen, 2011). In all Liangmai-Naga villages, communal ownership enables every citizen to access land, cultivation, and forest resources. This creates livelihood opportunities and community sustenance. The critical

point is women's right to use of land, cultivation and natural resources. This creates livelihood opportunities and community sustenance. The growing privatisation of land and forest risks excluding women from these customary rights. It not only weakens the collective foundations of tribal society but also puts women to a large extent. At this point, strengthening community-based land governance and safeguarding collective ownership through government support is critical. Such a dimension can support women's self-reliance and sustainable tribal development even in the future.

#### *6.7.4 Revitalising Indigenous Women's Economic Practices*

Customary systems such as *liuleh* and *mawatbo* should be revitalised. Not only modern education, skill development, and women's entrepreneurship initiatives, but also traditional practices need to be synthesised. Contextualisation of *liuleh* and scientific expertise in a critical manner can enhance women's emancipation. Integrating indigenous economic practices with contemporary opportunities can enrich women's identity and rights. Such approaches may contribute to building more equitable and sustainable tribal societies. Moreover, grounded women's rights and dignity in indigenous values can determine the future of women and the collective well-being of the community.

### **6.8 Conclusion**

This study demonstrates that women experience greater autonomy and participation than their counterparts in many other societies, but they continue to face exclusion within a male-dominated structure. Although communitarianism exists, patriarchy coexists with it. Women are legally prohibited from landholding, political leadership, and decision-making authority. Thus, the tension between communitarian ideals and patriarchal realities in tribal society reveals that the claim of so-called "egalitarianism" is incomplete.

Within this context, the study examined *liuleh* as a culturally grounded institution of women's economic rights. The findings show that *liuleh* endows Liangmai-Naga women with economic power. On the other hand, *liuleh* operates within a patriarchal system but women's empowerment cannot be understood solely through legal, liberal, or individualistic frameworks. It demonstrates that women's agency often emerges through negotiation, adaptation, and communal relationships rather than through purely individual forms of resistance.

More broadly, this study contributes to wider conversations on indigenous feminism and decolonial gender discourse. *Liuleh* is both accommodating and transformative within Liangmai-Naga customary law. Indigenous practices such as *liuleh* therefore reveal that pathways to gender justice can emerge from within tradition itself, even while requiring continuous critical engagement, reinterpretation, and structural transformation in order to become more inclusive and genuinely emancipatory.

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