

## **Illegal Immigration in India: A Case of Rohingya Muslims**

**Anirudh**

Research Assistant, Shyam Lal College, University of Delhi

### **Abstract**

The Rohingya Crisis in Myanmar has triggered a refugee spillover in the neighbouring countries causing significant regional and security implications, especially for India. India faces the challenge of balancing its approach between humanitarianism and national security. The threats of extremism, transnational crimes, demographic pressure etc are exacerbated by having illegal immigrants inside our territory. India has resorted to the deportation of these immigrants by prioritising national security but at the same time, humanitarian aid and initiatives to address the plight of the Rohingya community reflect her commitment to democratic and humanitarian ideals. The paper traces the history of the crisis in Myanmar and examines how it has evolved over different phases. It also briefly discusses challenges and threats to India's security while highlighting the efforts taken to mitigate these threats as well as to address the humanitarian plight of the community. This paper concludes by proposing how India can move forward from here ensuring a safe repatriation of the immigrants while safeguarding national security.

### **INTRODUCTION**

The world has been witnessing the evolving Rohingya conflict and the violence in Myanmar. The Rohingya are a predominantly Muslim ethnic minority group from the northern side of the Rakhine state in Myanmar who have lived for centuries in Myanmar - formerly known as Burma<sup>1</sup>. However, they have been denied citizenship in Myanmar and have become stateless since then. This ethnic and political violence has manifested itself in the form of a refugee crisis spillover in neighbouring countries. This has been termed a humanitarian catastrophe by many organisations including the Advisory Committee on Rakhine State led by Kofi Annan.<sup>2</sup>

This crisis has serious regional implications including security threats that emanate from immigrants who are entering illegally into neighbouring countries including India. According to the public estimates of the Indian government in 2017, an estimated 40,000 Rohingya are in India

---

out of which only 20,000 are registered with the UNHCR. The figures might have changed following the military coup in February 2021. India has accorded the status of ‘illegal immigrant’ to Rohingya and not that of refugee because they have arrived in India without legal documentation.<sup>3</sup>

This paper deals with the challenges to India's national security arising from this crisis as well as other issues surrounding it and how India can navigate through a spectrum with national security on one end and humanitarian concerns on the other.

### **TRACING THE HISTORY**

The origin of the Rohingya crisis in Myanmar can be traced back to the colonial rule in erstwhile Burma. This whole crisis can be divided into three different phases which will help understand the backdrop of the present-day situation.

*Phase One* is the colonial phase. In this phase, the British colonial recruitment policy and territorial divisions exacerbated conflicts among different ethnicities<sup>4</sup>. The British wanted the support of the Burmese people in their efforts against the Japanese in World War 2. However, the majority, Buddhists did not support the British but the minorities such as Rohingya pledged their allegiance to the British. This was not perceived well by the Buddhists and resentment got built up. They had a secessionist intention in those days as they were promised a land of their own by the British in return for supporting them in WW2<sup>5</sup>. In a country already as diverse as Burma, the seeds of ethnic segregation were sowed by the British.<sup>6</sup> Soon after independence, some Rohingyas decide to pick up weapons against the forces of Myanmar. This came to be known as the Mujahid insurgency which lasted for the first few years after independence. This was done to achieve an independent Arakan state and merge it with East Pakistan.

*Phase Two* is the post-independence phase where General Aung San and other leaders from the frontier regions tried to work towards reconciliation among different ethnicities with the *Panglong agreement*. This agreement, whose details are still conjecture, was just enough to hold some peace for the next few years. However, in 1962, a military coup established the rule of General Nay Win and ended whatever unity that was achieved. In 1964, the concept of ‘national races’ or ‘*Taingyintha*’ was introduced by General Ne Win which was adulterated over time to denote the exclusivity of the members of one single community united against ‘enemies’ both

inside and outside.<sup>7</sup> In the same year, the National Security Act and subsequently, laws such as the Constitution of 1974, the Citizenship Law of 1982, the Marriage laws in the 1990s etc were introduced. In due course of time, Rohingyas were stripped off of their civil, political, and human rights. Since the 1970s, military operations like *Nagamin*, *Pyi Thaya*, etc. and several crackdowns on the Rohingya in Rakhine have forced more than one million to flee to neighbouring countries. *Phase Three* can be said to have started in 2012 when some political and economic changes were introduced by the President.<sup>8</sup> These were aimed at delegating some powers to the lower levels of government and to ease up the control of military and security forces. However, riots broke out in the Rakhine state in 2012 between the majority, Buddhists and minority Rohingya. The clashes resulted in deaths, displacement, and destruction of property, primarily affecting the Rohingya population. There were instances of increased brutality and suppression in 2016- 17 which exacerbated the migrations. From 2012 to 2016 the violence in Rakhine State has taken at least 1,000 lives and has internally displaced over 1,40,000.<sup>9</sup>

### **RESPONSE FROM ROHINGYAS**

Ever since the 1960s, in response to the continued violence and perpetuating crisis in the Rakhine state, many organisations have emerged over a period of time claiming to be the face of the Rohingya community. These include the Rohingya Solidarity Organisation (RSO), Arakan Rohingya Islamic Front (ARIF), Arakan Rohingya National Organisation (ARNO), Aqa Mul Mujahideen (AMM) and the most prominent one lately, Arakan Rohingya Salvation Army (ARSA).

Some of these organisations have tried to resort to violence as a response to the Myanmar government's policies and actions. Outfits like AMM have been designated as ipso-facto terrorist organisations by the governments of India and Myanmar. However, the year of 2012 saw the emergence of a new group. Also known as Harakh al-Yaqin (HaY), ARSA claims itself to be an ethno-nationalist group and a pioneer of the Rohingya struggle against the Myanmar government but its nature and priorities have been deemed to be extremist.<sup>10</sup> ARSA however, has been in the news for its extremist face after October 2016 when the group took responsibility for a major attack on the Border Guard Police of Myanmar which led to the death

of several policemen<sup>11</sup>. Since then, it has been repeatedly linked with such clandestine activities including the murder of 99 Hindus in 2017<sup>12</sup>, playing a part in the killings of moderate Rohingya Muslim leaders. A 2019 report titled *Reviving the Courageous Hearts* talked of the group's capacity to use violence and linked ARSA with previous mujahid groups in Myanmar.<sup>13</sup>

ARSA has claimed to be the pioneer of the rights of Rohingya and the protagonist of the struggle against the Myanmar Army. In response, it has been marked as an extremist group by the government of Myanmar. Myanmar's authorities subsequently described ARSA as being connected with Al Qaeda, and ISIS<sup>14</sup>. ARSA has since been routinely identified as a terrorist group by other influential regional actors, including the governments of Bangladesh, China, and India. The leader of ARSA is a Pakistani national named *Ata Ullah*. He was raised in Saudi Arabia and it is believed, as per the reports of the International Crisis Group, that the funding and support for the Rohingya insurgency come from the likes of Saudi Arabia and Pakistan based on his connections there. HaY was established and is overseen by a committee of some twenty senior leaders headquartered in Mecca, with at least one member based in Medina. All are Rohingya émigrés or have Rohingya heritage. They are well connected in Bangladesh, Pakistan and possibly India.<sup>15</sup> However, it is to be noted that ARSA doesn't fully represent all the Rohingya. There has been resistance from the community against ARSA and its claim of being the sole/main representative of the community.

### **PRESENT DAY SITUATION**

The Rohingya find themselves trapped between the Myanmar Army and the Arakan Army (AA) who are fighting to gain power and control. The AA wants a land of their own, free of Rohingya Muslims.<sup>16</sup> There was a temporary truce between the junta of Myanmar and the Arakan Army in 2020, which was brokered by the Nippon Foundation. The peace was cut short when the struggle started again in July 2022 following air strikes by the Myanmar army and retaliatory attacks by the Arakan Army.<sup>17</sup> Since 2017, 730000 Rohingya have fled to neighbouring countries, predominantly Bangladesh, taking the total number of Rohingya immigrants to over 1 million.<sup>18</sup> This shows that the situation in Myanmar is too uncertain at the moment to predict or plan anything related to this crisis. However, neighbouring countries like Bangladesh, India, Malaysia etc. face the challenge of dealing with a huge number of Rohingya

---

immigrants crossing illegally into their territories.

### **IMPLICATIONS FOR INDIAN SECURITY**

The Indian government has time and again emphasised the security threats that emanate from having illegal immigrants inside the territory of our country. Now, the Rohingya community comes with its own set of challenges and threats which are multifaceted.

The first and direct threat is the links of Rohingya extremist outfits such as ARSA, RSO, and AMM with transnational jihadi and terror outfits like Al Qaeda, LeT and Jamaat-ul-Mujahideen (JMB). These links could easily exploit and radicalise Rohingya in India. As mentioned above, there are proven connections between Rohingya militant organisations and Pakistan.<sup>19</sup> This poses a serious threat of terrorism and extremism in India resonating with the proxy war idea of Pakistani intelligence to destabilise India. A news report from January 2020 pointed out the involvement of the Pakistani intelligence agency ISI in training Rohingyas in Bangladesh with the help of JMB in the Chittagong hill tracks of Bangladesh.

The Azad Maidan Riots of 2012<sup>20</sup> is a small example of how the presence of Rohingya aggravates the prospects of radicalisation. The *Cox Bazaar* of Bangladesh is a hotspot for these terrorist organisations to lure youth and channel their resentment and frustration over lack of facilities and deplorable living conditions towards extremism and radicalisation.. Time and again, terrorists of Al-Qaeda, IS, LeT, JMB, etc. have mentioned the plight of the Rohingya community and swore to wage *jihad* or a religious war. Although the Rohingya themselves have not shown any connection to these outfits but these terrorist organisations have repeatedly invoked the narrative of *Ghazwa-e-Hind* where Hind is not just limited to India but parts of South Asia.<sup>21</sup> The authorities of Malaysia have also reported the recruitment of Rohingya by IS.<sup>22</sup>

The second challenge is that of human trafficking. The South Asian region is plagued by transnational organised crimes. According to a report from the UN Office on Drugs and Crimes, over 150,000 people are trafficked within South Asia every year for sex work, labour, forced marriages, and organ trade and it is often the very economic state and conditions that contribute to the vulnerabilities of young people, women and children.<sup>23</sup> We have usually seen that women and children are more prone to face the brunt of this exploitation. Rohingya women are not any less vulnerable to the same. There have been reports of the trafficking of Rohingya women for prostitution or marriage in India.<sup>24</sup> Some Rohingya women respondents confirmed the same in

a study conducted by MMC Asia.<sup>25</sup> So, it becomes a pressing challenge for the country and for the society as well.

The third major challenge is drug trafficking. The Golden Triangle (Laos, Myanmar, Thailand) is notoriously known as the global centre for drug production and trade. Myanmar is the second largest producer of Opium in the world. As we know India and Myanmar share border with each other, flow of drugs becomes a threat to the security and stability of India. There have been reports which have directly linked the production of Opium in Myanmar and increased seizures of the same in the northeastern states of India.<sup>26</sup> In Bangladesh, Rohingya were found to be involved in a raid conducted on the trade of a drug called 'Yaba'. They belonged to Teknaf town located in the *Cox Bazaar*, which is the largest Rohingya settlement in Bangladesh.<sup>27</sup> The maritime route used for smuggling drugs into India moves from Myanmar to *Cox Bazaar* and then to India.<sup>28</sup> Now, it is to be emphasised here that the push to engage in drug trafficking and smuggling comes from poor living conditions and a lack of money.

Considering how Rohingyas form a vulnerable group in society from the lens of social, financial and political security, they become easy prey for organisations involved in transnational crimes to lure and use them for illicit purposes. This was pointed out in a report by UNDOC; 27

*“Displaced, poor and migrant communities bear the brunt of this criminal activity and on occasion are forced to engage in opium farming or illegal resource extraction for their survival; this can lead to civilians becoming drug users or fall into debt at the mercy of crime groups.”*

Another challenge is the threat posed by demographic change, particularly in north-east India. That region is already suffering from the constant influx of refugees and immigrants from Bangladesh. The people from northeast India face a challenge to their identity because of this. If we take the example of Assam, the state has been thrown into disarray and insurgency because of the presence of illegal immigrants.<sup>29</sup> In such a delicate situation, having Rohingya and other illegal immigrants in these areas could be detrimental to the peace and stability of the region. The state of Manipur has been experiencing ethnic tension and turmoil for some time now. It is believed that one aspect of this violence is the support that the *Kuki* community has for immigrants coming from Myanmar who share the same ethnicity.<sup>30</sup> Against such a backdrop, the presence of Rohingya in the region could fuel the tensions and aggravate an already poor situation. The same has been emphasised time and again by different political leaders and

---

stakeholders in the NER.

Now, having discussed the implications for the security of India, we shall take a look at how India has responded to the complexities of the Rohingya crisis.

### **INDIA'S RESPONSE**

Despite not being a signatory to the Refugee Convention of 1951 and the subsequent Protocol of 1967, India has always been welcoming to refugees and asylum seekers. However, the stance of India towards Rohingya from Myanmar has been slightly different for multiple reasons.

In the beginning, when the *third phase* of the crisis started back in 2012, India was sympathetic to the community. As a token of the same, India announced a relief package of 1 million US\$.<sup>31</sup> The then-Indian government led by UPA also allowed the Rohingyas to enter India.<sup>32</sup> The Indian Government did not take up the issue publicly and showed faith in the Myanmar Government to ensure that Myanmar doesn't tilt towards China which is keen to take advantage of the situation. Also, India has high stakes in the development of Myanmar with the likes of the Kaladan Multimodal Transit Transport Project and Trilateral Highway Project which would act as a gateway to Southeast Asia etc. These reasons prompted India to adopt a pro-Myanmar Government approach.

However, the NDA government led by PM Narendra Modi changed its stance towards Rohingyas. It has reiterated time and again that Rohingya need to be deported back to Myanmar. The reason often cited behind this is that Rohingyas are not refugees or asylum-seekers but illegal immigrants. They have been deemed illegal immigrants because of the Foreigners Act of 1946, enacted by the Central Legislative Assembly, which is the basis of India's conduct towards refugees. This act clearly states that any person living inside of India without proper documentation is an illegal immigrant.<sup>33</sup>

Indian government plans to identify, restrict and safely deport these immigrants back to Myanmar.<sup>34</sup> This was made evident when in a case pertaining to the deportation of Rohingyas in the Supreme Court of India, the government submitted an affidavit which emphasised that Rohingyas have no fundamental right to reside in the country and the government is committed to deporting them. This was propounded in the judgment too.<sup>35</sup>

The Indian government, in the beginning of 2024, carried out raids led by the National

---

Investigating Agency to capture those who traffic Bangladeshis and Rohingya into the country as well as these immigrants.<sup>36</sup>

However, India has been very much sensitive to the humanitarian concerns of the community. Indian approach has been constructive and conducive to our strategic interests. India looks forward to rehabilitating these refugees and as a step in the same direction, India has signed an MoU with the Government of Myanmar which has seen India commit US\$ 25 million over five years for the reconstruction of the violence-torn Rakhine state starting from 2017.<sup>37</sup> Apart from this, India has also tried to bolster the Bangladeshi capacity to host refugees with Operation *Insaniyat* by extending material assistance to help with the large influx of Rohingyas.<sup>38</sup> This shows India's unwavering commitment to the plight of refugees and its efforts to live up to the reputation of being one of the leading countries to offer humanitarian assistance to those in need.

### **WAY FORWARD FROM HERE**

India stands tall worldwide for its unwavering commitment to democracy, peace and non-violence. With initiatives like 'Neighbourhood First', 'Look East', etc. aimed at improving relations with neighbouring countries, India has always strived to achieve stability and growth not just for itself but for neighbours from South and Southeast Asia. Also called India's gateway to Southeast Asia, Myanmar is immensely important to us. India shares historical, cultural and ethnic ties with the people of Myanmar.

The internal security of India is compromised by illegal immigrants, drug trafficking and transnational crimes taking place through the porous border with Myanmar. At the same time, instability, chaos and human rights violations in Myanmar are detrimental to our strategic interests. That being said, it becomes imperative for India to engage with Myanmar and ensure its commitment towards regional stability while keeping its strategic interests in mind. Although India has taken some steps towards the humanitarian concern of Rohingyas while maintaining a balance with its security concerns, these efforts have not proved to be enough.

When we look at the situation from the security perspective, India has always maintained the position of safe and speedy deportation and rehabilitation of Rohingya immigrants in India. However, we see that although there has been repeated mention of the deportation of Rohingyas, hardly any progress is evident on the ground. We still don't know the exact number of illegal



Rohingya immigrants in India. Also, no clear-cut plan has been devised as to how we plan to deport them back. On the other hand, the condition of Rohingyas currently living in refugee camps is deplorable. They do not have sufficient access to basic amenities like food and healthcare. Now, although India is firm on its stand to deport them back, we hold a moral obligation to ensure these amenities until the deportation starts. This situation has become a tightrope walk for Indian policymakers.

So, the only way forward from here is to engage with the junta and other stakeholders and platforms like ASEAN to take up the Rohingya Crisis. Initiatives towards a stable and peaceful Myanmar can ensure a safe and speedy return of these immigrants from India. This way, India can navigate its way through the security concerns and the humanitarian aspect of the Rohingya Crisis.

## **REFERENCES**

- <sup>1</sup> Rohingya refugee crisis explained. (n.d.). <https://www.unrefugees.org/news/rohingya-refugee-crisis-explained/#Rohingya>
- <sup>2</sup> Advisory Commission on Rakhine State. (2017). TOWARDS a PEACEFUL, FAIR AND PROSPEROUS FUTURE FOR THE PEOPLE OF RAKHINE. In *Final Report of the Advisory Commission on Rakhine State*  
[https://www.kofiannanfoundation.org/app/uploads/2017/08/FinalReport\\_Eng.pdf](https://www.kofiannanfoundation.org/app/uploads/2017/08/FinalReport_Eng.pdf)
- <sup>3</sup> Sawant, A., Sharma, R. S., GOVERNMENT OF INDIA, MINISTRY OF HOME AFFAIRS, MINISTER OF STATE IN THE MINISTRY OF HOME AFFAIRS, & RIJJU, K. (2018). ROHINGYA REFUGEES/MIGRANTS. In *LOK SABHA*.  
<https://www.mha.gov.in/MHA1/Par2017/pdfs/par2018-pdfs/ls-31072018-English/181.pdf>
- <sup>4</sup> Walton, M. J. (2008). Ethnicity, Conflict, and History in Burma: The Myths of Panglong. *Asian Survey*, 48(6), 889–910. <https://doi.org/10.1525/as.2008.48.6.889>
- <sup>5</sup> Settles, D., & Settles, D. (2022, February 10). The Rohingya Genocide is Rooted in British Colonialism. Spheres of Influence. <https://spheresofinfluence.ca/the-rohingya-genocide-is-rooted-in-british-colonial-legacy/>
- <sup>6</sup> Ganesan, N., & Hlaing, K. Y. (2007). Myanmar: state, society and ethnicity.  
<http://ci.nii.ac.jp/ncid/BA81680925>
- <sup>7</sup> Nick Cheesman (2017) How in Myanmar “National Races” Came to Surpass Citizenship and Exclude Rohingya, *Journal of Contemporary Asia*, 47:3, 461- 483, DOI: 10.1080/00472336.2017.1297476
- <sup>8</sup> Max Beauchamp, “Beyond bigotry: Unravelling ethnic violence in Rakhine”, *New Mandala*

- (December 19, 2013), <http://www.newmandala.org/beyond-bigotry-unravelling-ethnic-violencein-rakhine/>
- <sup>9</sup> Arnold, K. (2016). Myanmar's Shame: Living inside Rohingya Ghettos, March 31, 2016, <http://www.cnn.com/2016/03/31/asia/myanmar-rohingya-camp/>
- <sup>10</sup> Lee, R. (2021). Myanmar's Arakan Rohingya Salvation Army (ARSA): An Analysis of a New Muslim Militant Group and its Strategic Communications. *Perspectives on Terrorism*, 15(6), 61–75. <https://www.jstor.org/stable/27090916>
- <sup>11</sup> Solomon, F. (2016, October 10). Nine police have been killed in border post attacks in western Burma. *TIME*. <https://time.com/4524441/burma-myanmar-border-attacks-rakhine-rohingya/>
- <sup>12</sup> Amnesty International. (2021, October 7). Myanmar: New evidence reveals Rohingya armed group massacred scores in Rakhine State. <https://www.amnesty.org/en/latest/news/2018/05/myanmar-new-evidence-reveals-rohingya-armed-group-massacred-scores-in-rakhine-state/>
- <sup>13</sup> Amnesty International. (2021, October 7). Myanmar: New evidence reveals Rohingya armed group massacred scores in Rakhine State. <https://www.amnesty.org/en/latest/news/2018/05/myanmar-new-evidence-reveals-rohingya-armed-group-massacred-scores-in-rakhine-state/>
- <sup>14</sup> *Ibid*
- <sup>15</sup> Myanmar. (2023, October 1). Crisis Group. <https://www.crisisgroup.org/asia/south-east-asia/myanmar>
- <sup>16</sup> Quinley, C. (2024, May 21). 'Nowhere to go': Rohingya face arson attacks in Myanmar's Rakhine State. *Al Jazeera*. <https://www.aljazeera.com/news/2024/5/21/nowhere-to-go-rohingya-face-arson-attacks-in-myanmars-rakhine-state>
- <sup>17</sup> *Informal ceasefire with Myanmar military 'not permanent' solution, Arakan Army says*. (2022, November 27). Myanmar Now. <https://myanmar-now.org/en/news/informal-ceasefire-with-myanmar-military-not-permanent-solution-arakan-army> says#:~:text=Serious%20battles%20took%20place%20between,ultimately%20resulting%20in%20renewed%20clashes.
- <sup>18</sup> Future bleak for Rohingya in Bangladesh, Myanmar. (2023, August 21). *Human Rights Watch*. <https://www.hrw.org/news/2023/08/20/future-bleak-rohingya-bangladesh-myanmar>
- <sup>19</sup> Chaudhury, D. R. (2018, July 12). Rohingya terrorists linked to pro-Pak terror groups in Jammu & Kashmir. *The Economic Times*. <https://economictimes.indiatimes.com/news/defence/rohingya-terrorists-linked-to-pro-pak-terror-groups-in-jammu-kashmir/articleshow/55046910.cms?from=mdr>
- <sup>20</sup> Mumbai Bureau. (2021, December 4). *Two killed as protest in Mumbai against Assam riots turns violent*. *The Hindu*. <https://www.thehindu.com/news/national/other-states/two-killed-as-protest-in-mumbai-against-assam-riots-turns-violent/article3754170.ece>

- <sup>21</sup> Memri. (2014, May 23). Jihad and Terrorism Threat Monitor (JTTM) Weekend Summary. *MEMRI*. <https://www.memri.org/reports/jihad-and-terrorism-threat-monitor-jttm-weekend-summary-91>
- <sup>22</sup> IS recruiting Rohingya refugees in Malaysia, says anti-terror chief,” Today, August 27, 2018, <https://www.todayonline.com/world/recruiting-rohingya-refugees-malaysia-says-anti-terror-chief>
- <sup>23</sup> Isheeta.Sumra. (n.d.). *preventin of human trafficking*. <https://www.unodc.org/southasia/en/topics/frontpage/2009/preventin-of-human-trafficking.html#:~:text=Over%20150%2C000%20people%20are%20trafficked,young%20people%2C%20women%20and%20children.>
- <sup>24</sup> OUTLOOK ARTICLE PULITZER CENTER
- <sup>25</sup> Development And Justice Initiative (DAJI), DAJI, & Brenner, Y. (2019). Rohingya migration to India: patterns, drivers and experiences. *Briefing Paper*. [https://mixedmigration.org/wp-content/uploads/2019/04/063\\_briefing-paper\\_Rohingya\\_India.pdf](https://mixedmigration.org/wp-content/uploads/2019/04/063_briefing-paper_Rohingya_India.pdf)
- <sup>26</sup> *Challenges to India’s national security: the illicit flow of drugs from Myanmar to India-Pre and post Myanmar Coup of 2021 – CENJOWS*. (2023, June 8). <https://cenjows.in/challenges-to-indias-national-security-the-illicit-flow-of-drugs-from-myanmar-to-india-pre-and-post-myanmar-coup-of-2021/>
- <sup>27</sup> ORF Article
- <sup>28</sup> *Challenges to India’s national security: the illicit flow of drugs from Myanmar to India-Pre and post Myanmar Coup of 2021*
- <sup>29</sup> Lt Gen (Retd) S K Sinha, PVSM. (1998). Illegal Migration into Assam. In *satp.org*. [https://www.satp.org/satporgtp/countries/india/states/assam/documents/papers/illegal\\_migration\\_in\\_assam.htm](https://www.satp.org/satporgtp/countries/india/states/assam/documents/papers/illegal_migration_in_assam.htm)
- <sup>30</sup> Roy, E. (2023, August 5). Looking northeast: Amid violence, a new resolve on ‘illegal immigrants’ in Manipur. But no easy answers. *The Indian Express*. <https://indianexpress.com/article/political-pulse/looking-northeast-violence-illegal-immigrant-manipur-8877886/>
- <sup>31</sup> *India announces \$1 million to Myanmar's troubled Rakhine state*. (n.d.). NDTV.com. <https://www.ndtv.com/india-news/india-announces-1-million-to-myanmars-troubled-rakhine-state-507565>
- <sup>32</sup> Khan, A. (2019, July 13). *Congress gave Rohingyas free access to India and land - The Sunday Guardian Live*. The Sunday Guardian Live. <https://sundayguardianlive.com/news/congress-gave-rohingyas-free-access-india-land>
- <sup>33</sup> India. (1946). THE FOREIGNERS ACT, 1946. In *THE FOREIGNERS ACT, 1946*. <https://www.indiacode.nic.in/bitstream/123456789/2259/3/A1946-31.pdf>
- <sup>34</sup> RIJJU, K. & GOVERNMENT OF INDIA. (2017). STAND OF GOVERNMENT ON ROHINGYAS. *RAJYA SABHA*. <https://www.mha.gov.in/MHA1/Par2017/pdfs/par2017->

---

pdfs/rs-20122017/534.pdf

<sup>35</sup> O r d e r. (2017). In *IN THE SUPREME COURT OF INDIA* (legal case INTERLOCUTORY APPLICATION NO.38048 OF 2021).

[https://main.sci.gov.in/supremecourt/2017/27338/27338\\_2017\\_31\\_1502\\_27493\\_Judgement\\_08-Apr-2021.pdf](https://main.sci.gov.in/supremecourt/2017/27338/27338_2017_31_1502_27493_Judgement_08-Apr-2021.pdf)

<sup>36</sup> Pandey, D. K. (2024, February 6). *NIA chargesheets 24 ‘operatives’ of international syndicates trafficking Bangladeshi nationals and Rohingya into India*. The Hindu. <https://www.thehindu.com/news/national/nia-charge-sheets-24-operatives-of-international-syndicates-trafficking-bangladeshi-nationals-and-rohingyas-into-india/article67817783.ece>

<sup>37</sup> India-Myanmar – Bilateral Brief

[https://www.mea.gov.in/Portal/ForeignRelation/Mynmar\\_may2020.pdf](https://www.mea.gov.in/Portal/ForeignRelation/Mynmar_may2020.pdf)

<sup>38</sup> Operation Insaniyat- Humanitarian assistance to Bangladesh on account of influx of refugees [ICC Legal Tools Database | Operation Insaniyat - Humanitarian assistance to Bangladesh on account of influx of refugees \(legal-tools.org\)](#)