

An analysis of Human Rights violation in Jammu and Kashmir region and the impacts of 35A & 370: Before and after Evaluation

¹Dr. Ramesh Kumar, ²Vaibhav

¹Associate Professor, ²Research Scholar
Department of Political Science,
Central University of Haryana, Mahendergarh

Abstract: Human rights are always the most debating issue since the ancient times. Yet in the context of Jammu & Kashmir it was dragged too much. Human rights are the most bewildered concept because some rights are positive for some others while the same become the reason of violation. Jammu and Kashmir region is also the compact of this type of situation. To maintain the peace in this region the security forces initiated many operations in which arrest and detentions were increased. It is damn true that in the military operations the disappearances are increased and by seeing this chance many liberalised groups and NGO's like Amnesty international started to counter the Indian government on this issue. The blames prosecuted by them are that no legal provisions are adopted by security forces in the arrest and detention. After the abrogation of Art 35A & dilution of 370 the conflicts are decreased and in this reference the police and security forces actions are also decreased. The rights of women were also concerned in the context of Art 35A & 370. The immovable property rights of women were most concerning issue even they lost their citizenship after marrying with the men out of the related state. The impeachment of these special provisions increased the status of the women. The concept of Right to education which is considered as the bone marrow of the education system is also located in Jammu and Kashmir educational system. The government of India is also trying to solve the problem of the migrants in the respected region. The overall scenario and the researches reflect that the graph of Human rights is increased in the Jammu and Kashmir region after the abrogation of the Art. 35A & 370. In this research paper descriptive and before and after methodology is adopted. To reach at desired outcome secondary sources are used.

Keywords: Human rights, Militants, Insurgency, Financial aid

Introduction

The issue of human rights are always the most concerning issue in the Kashmiri region. Yet various theorist stipulates its according to their perception such as realist considers it as a "soft issue" in international relations as contrast to 'core' issue like security and prosperity while liberalists consider the rights are the product of liberal philosophy. Some famous NGO's like Amnesty international mentions in its report that India is responsible for harassing the rights in this region. It published its report proclaiming that central government is responsible for undue arrest and detention in this region. While many feminist concerns about the rights of women against the patriarchal system and considers that hard core rule of the Islamic scholars and the Art. 370 and 35A are responsible for the deteriorated conditions of the women in this region. The Hindi liberalist parties are mobilising the masses by adhering the view of Hindu radicalism in this region and provoking that Hindu community is in danger this region. In this reference it is necessary to what the actual situation of rights and who is responsible for this. Is actually the Art.370 & 35A are the two broad streams who hanged the rights or they were actually needed. This paper is try to investigate the rights of the people in that region and what the basic conditions are necessary at the ground level for improving the rights of the people in that region. In the Global world human rights are the major actor to impose the constraint on the behaviours of governments. They are as necessary as water and air in the contemporary time period. The Jammu and Kashmir was assimilated in India on 27 Oct,1947 by the instruments of accession. It is the state who is at top of India in northern frontiers geographically but here a question is arose that being a part of India why this state is too much controversial. The answer observed from its geographical location. Kashmir is a Himalayan region that both India and Pakistan say is fully theirs. The area was once a princely state called Jammu and Kashmir, but it joined India in 1947 soon after the sub-continent was divided up at the end of British rule. India and Pakistan subsequently went to war over it and each came to control different parts of the territory with a ceasefire line agreed. There has been violence in the Indian-administered side - the state of Jammu and Kashmir - for 30 years due to a separatist insurgency against Indian rule. After getting defeat in war Pakistan adopted the policy of "Bleed India with thousand cuts". The separatist activities run by the Government of Pakistan has been observed for the violation of peace in this region. The peace and the enhancement of the rights for the development of the people are proportionally related but the question is that what type of peace is disturbed and what type of rights are developed with the establishment of Art. 370 and to whom the problem is occurring for the removal of Art 370 and 35A. The legality of impeachment of this article and the establishment of this article in past can may be judged and if it is legally acceptable by the court then what the circumstances get occurred on the legality of constitution. This paper is based on the secondary sources. Mainly the investigation is done by focusing on the issue of the Human Rights.

History of Art. 370 & 35A

The main reason behind the insertion of Article 370 was that the State of Jammu and Kashmir was not ready to get included as a normal state because of the war going on between India and Pakistan over the state due to which Gopalswami Ayyangar a minister

in Union drafted the Article 370 and got it inserted in the Constitution of India. While the key drafter of Indian Constitution Dr. Bhim Rao Ambedkar and Sardar Vallabh Bhai Patel had opposed this because they wanted to count it as a united nation not to calculate separate states under one province.

Hari Singh the maharaja (King) of the Kashmir on October 26th 1947 signed an instrument of accession in which it was cleared out that he is surrendering the three jurisdictions to the Government of India namely – external affairs, defence and communications of the state¹. Further after this the British ruler changed the instrument and somehow convinced the Nehru to overlook the instrument and create new policy for the state and impose it for the benefit of the nation. The issue of Article 370 was first being dealt in the year 1949 immediately after the republic of India and separation of both the nations namely India and Pakistan. Due to which many politicians and ministers felt threat for the citizens of Jammu and Kashmir. The war taking place in between both the nations was very much disturbing for both citizens and nation. Also the decision of making it a separate state was partly wrong when concerned for the purpose of unity and one nation. After this a major operation or incident took place in the society when Sheikh Abdullah was arrested on 9th August 1953 but before that Sheikh Abdullah wrote a letter to Maulana Azad and Nehru's letter as well as note on Abdullah's arrest. On 8th August 1953, an order was passed saying that Sheikh Abdullah has been dismissed from the post of Prime Minister on the order of Sadr-i-Riyasat via a letter and in the same letter it was also mentioned that Bakshi Ghulam Mohammad to be appointed as new Prime Minister of the nation. Now-a-days when whole of the world is getting developed in every field but this state and its residents are not able to grow and develop themselves eventually to keep growing and develop themselves and their city too so as to cope up with the new trends that are being followed out in the world. After so many successful years of implementation of Article 370 of Indian Constitution, a case was being filed in the Supreme Court regarding validity of this article as it clearly violates Articles 14, 15, 21 are the basic fundamental rights of any person which are being conferred or given by the Indian Constitution for every citizen is equal. The case was being dealt out and an application regarding the same was sent to the parliament to consider the concerned issue and necessary changes in the Constitution of India. The parliament of India took a decision which evolved each and everything in the society and mindsets of the people by declaring Article 370 to be unconstitutional due to its clear violation of fundamental rights conferred by the Constitution of India for each and every citizen. But the people of Jammu and Kashmir were not able to accept this change due to which many terrorist attacks, riots, etc., took place for which the Presidential Rule was imposed and a huge number of armed forces were sent there to control the situation and maintain peace in the state. The state is still not allowed to function normally as it is still under army control and many services like mobile networks are not working, social networking sites are blocked, transportation with other states are also limited like airports are available but for limited use, railways have limited its train services in the state, etc.

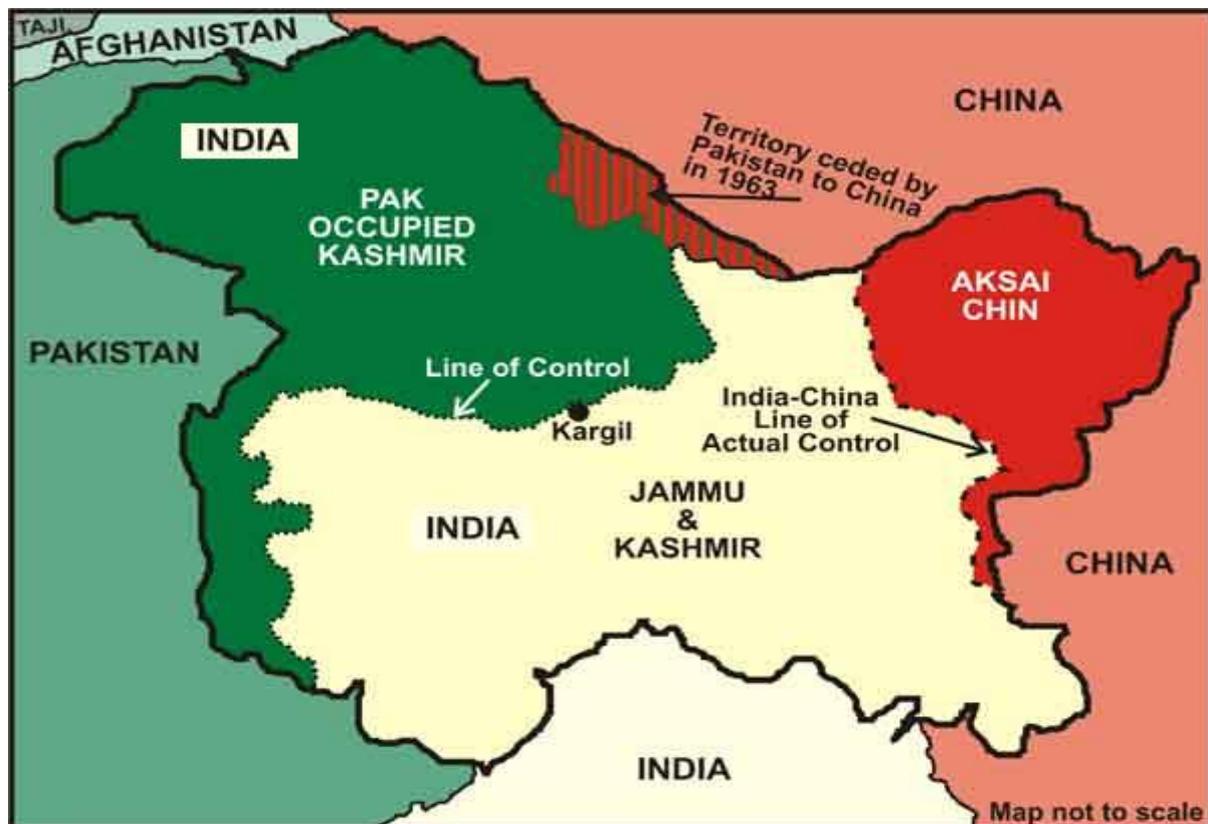
But for a change the relations between both the nations have improved due to the exposition of Pakistan in front of World Agencies due to which the Pakistani President is trying to improvise the relation between both nations by several steps one of them is opening a corridor for Sikh community to visit their gurudwara situated in the Pakistan's land. Although due to the several terrorist acts organised or sponsored by the Pakistan are exposed completely because of which Pakistan has now given numerous statements before the World Agencies for not getting indulged in any terrorist act for which they can give assurance.

Issue of Human Rights with 370 & 35A

Human rights are those provisions which provides the status to develop its virtue as a human being. Since after the civilisation these are concerned but with Hochpoch backgrounds and discussions. Many medieval western philosophers like Thomas Hobbes, John Locke and G.W.F. Hegel tried to pay much tribute to develop the concept of rights on universal level but they were failed. The most concerning issue for the development of the human civilisation is considered as the human rights in actuality what they are and how they develop the status of human being. The Rights consists mainly three categories civil, political, socio-economic. The Universal declaration of the rights overwhelmed the concept of the human rights with appropriate defensive proofs and justified the concept how it is necessary for the development of the human civilisation. Jammu & Kashmir is the status which had the special status in past. It is done by a presidential order during 1954 on temporary basis but the worrying concern is that it never rectified as the legal provision or never passed by the parliament till 2019. Without due recognition from the parliament it is still continue which is removed by another presidential order². The main aspect of this order is that Art. 35A is removed and the Art. 370 is only diluted with some provisions. It is not totally removed or abrogated. Art 35A which provides some special rights to the Jammu and Kashmir people infact they are the part of the Union of India. Article 370 under Part XXI empowers Jammu & Kashmir to have its own constitution³. It grants autonomous status to J&K. It restricts Parliament's legislative powers in respect of J&K. The residuary power which exists only in the centre, A state of India which have those special rights also hampers the feeling of Equality among the states of India. Along with the powers of the separate Parliament the centre orders were not forcefully applicable on the Jammu and Kashmir. Art. 35 A which is also the region for creation the inequality and provides special rights to the people of the Jammu and Kashmir. Article 35A, incorporated into the Constitution in 1954, provides special rights and privileges to the citizens of the state. Article 35A gives the Jammu & Kashmir Legislature full discretionary power to decide who the 'permanent residents' of the state are⁴. In other words, it grants such powers to J&K including the power to restrict settlement to the state and acquire immovable property. Immovable property rights which was a great innuendo on the integrity and the legality of the constitution of the India because these are mentioned in the Fundamental Rights but in the case of Jammu and Kashmir it practices on the basis of his own constitution. The worst example of the political rights is that the people of the Jammu and Kashmir were unable to elect the members of the legislative assembly of their own state legislative body. Even the women of the Jammu and Kashmir can lost their property rights after marrying with the people another state. These provisions were working like a chain which tied the Jammu and Kashmir in its own. The aftermath of this fastening is that Jammu and Kashmir lasted without industrial development and. Infact the pace of the Globalization is as slow as the walk of tortoise. The source of foreign currency is only the tourism which is also hampered in the COVID-19 pandemic. The greatest unpleasant mark for the people of the Jammu and Kashmir was now removed by the

presidential order by dividing this region in to two Union territories. This was the action which is tasted to establish the Rule of the law in this region.

The issue of the civil rights was also the surge for the development of the people but here the case is different. Yet it is damn true that the civil rights are also despaired by these special provisions Art 370 & 35A but here then role of Pakistan is increased to create the insurgency in this region. The geographical location of this region was also the reason for unneeded invasion of the Pakistan. Due to the hilly region the Pakistani militants enters in the region of the Jammu and Kashmir and create the insurgency⁵.



Source: <https://www.google.com/search?q=jammu+and+kashmir+map+with+pok+and+disputed+territory&tbm=isch&ved=2ahUKewjC6pzO-qP8AhVozqACHZcZC7wQ2-cCegQIABAA&oq=jammu+and+kashmir+map>

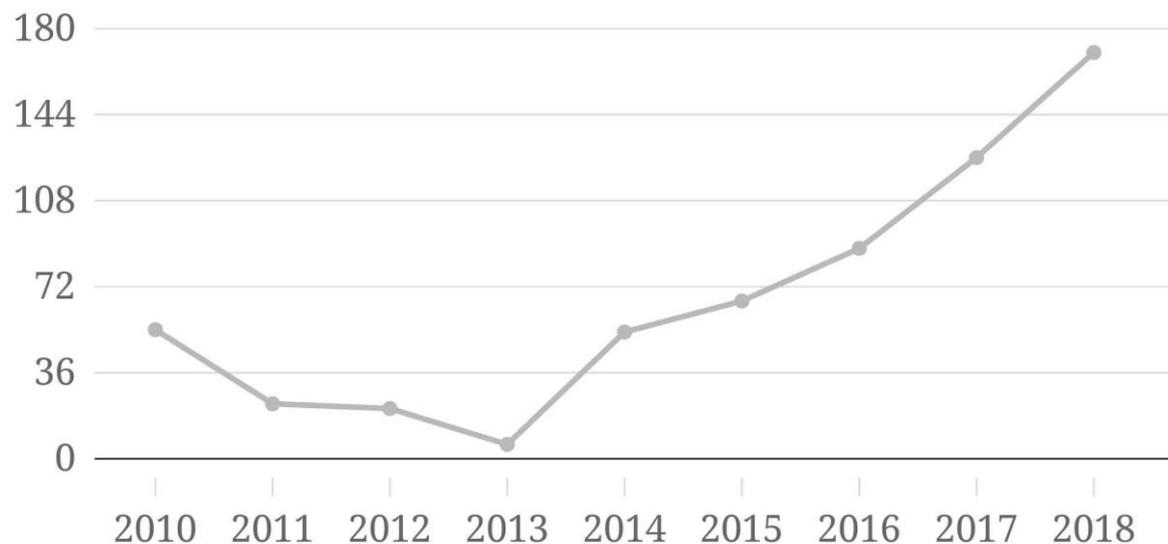
After getting the defeat in the forefront wars Pakistani military adopted the policy of the “Bleed India with thousand cuts”. According to this the Pakistani and the Afghan militant enters in the region and trifle the environment of the fear. The area occupied by the Pak was also the evil result of China’s expansion policy. It is the region of India which connects the India with the central Asian region. Despite the most crucial region of India it is also the region which has which is replete with many terrorist launchpads along with the Line of actual control. According to a study of UN the 56 organizations of terrorist are filled with the ideology of religious radicalism. However, it is true that these organizations also hampers the civil rights of the related community from which they belong. Their main objective is to hamper the peace in this region indirectly. A report of Indian express pays the tribute to the people which were only killed to express their views again the Shariat Laws. The terrorist activities were started in India Jammu and Kashmir region during 1989. It is because till that time Talibani group entrenched its roots at international level and the aids from USA in the guise of the funds, ammunition and advanced weapon fastened its pace. The conditions of the women in that region were very worst because of these militant activists⁶. Until this week, residents of Jammu and Kashmir, whose population is majority Muslim, had exclusive rights to property and state government jobs, among other privileges, though women marrying non-residents stood to lose those benefits. But the constitutional changes put residents and people from elsewhere in India on equal legal footing. Many women and women’s rights activists condemned the online comments that welcomed the changes for making it easier to marry Kashmiris.

Its deeply sexist,” said Rituparna Chatterjee, an independent journalist and activist who runs the Twitter handle @indiametoo handle that spotlights the stories of survivors of sexual harassment. “Women’s bodies have been battlegrounds for men for centuries. The latest comments on Kashmiri women are only testimony to this fact.”

The militants which adopted the ideology of the Shariat laws. Shariat laws are the most bewildered concept of the world about the rights of the women. The maximum freedom of the women were hampered by the Shariat laws. Along with this the institutionalised group the Pak-ISI was also the region to murder the civil rights if the people. The main features of Pak-ISI strategies are :- intensification of proxy war operations in a wide area extending from Jammu & Kashmir to North East, in-depth and extensive use of India’s immediate neighbourhood for executing its plans, subversion, indoctrination and training of vulnerable sections of society, espionage⁷. destabilizing the economy of the country by circulating fake currency notes and promoting drug trafficking, direct and indirect support to the underworld elements operating within and outside the country; and Raising the pitch of high-voltage

disinformation campaign to discredit India's security forces for alleged violation of human rights. The following graph reflects then data of militant recruitment in the Jammu and Kashmir region.

Militant recruitment in Kashmir (2010-2019)



Scroll.in

Source: Observer Research Foundation

The Government has adopted a well coordinated and multi-pronged strategy to tackle the activities of Pak-ISI by strengthening the border management to check illegal cross-border activities, gearing up the intelligence machinery, close interaction between different agencies of the Central and State Governments, neutralizing of plans of militants and anti-national elements by coordinated action, upgradation of police and security forces with advanced sophisticated weapons and communication system, etc. The Central Government has been sensitizing the State Governments about the threat perception and activities of Pak-ISI in the country. However if we observe the aftermath of the removal of 35A, there is no doubt that it increased the peace establishment possibilities in this region at the ground level but the foreign aid from China and the Pakistan cam never made able to India to overcome the region. The China which has the desires to cut the India from Central Asian region are dwelling their projects in the Gilgit Baltistan region. It also provides the weapons to the Pakistani militant groups for creation of insurgency in this region. India is also the crucial country which can challenge the hegemony of China in this region so due to this fear China also wants to ditch-up India in the proxy war with the Pakistan. Yet some critical philosophers consider India for rampaging the human rights in this region. The Amnesty international and the Greenpeace are the two NGO'S which desires to investigate the status of the human rights in this region but they are denied by India to give permission of the investigation of the human rights in this region. The Amnesty international which published its report by claiming that India is prescribing its hegemonic powers for Kashmiri people. The part of its reports puts its views on forefront are :-

“Human rights violations have risen dramatically in Jammu and Kashmir since late 1989, the start of the campaign for secession or for the state to join Pakistan. Many thousands of Kashmiris are arbitrarily detained under special laws that lack vital legal safeguards and provide the security forces with sweeping powers to arrest and detain. They are held for months or years without charge or trial⁸. Torture by the security forces is a daily routine and so brutal that hundreds have died in custody as a result. Scores of women claim that they have been raped. Efforts by relatives to use legal avenues to obtain redress have been persistently frustrated: court orders to protect detainees are routinely flouted and the legal machinery in the state has broken down. A judge of the Jammu and Kashmir High Court said in October 1994 that the rule of law in the state had ceased to exist.”

- The government of India arrested the young protesters with the help of security forces⁹.
- The torture in Jammu and Kashmir is of the exceptional brutality and explains the appalling number of people who have died in the custody of the security forces¹⁰.
- Hundreds of Kashmiris have died in the custody of security forces after arrest in “crackdown operations” to identify suspected militants.

Yet along with these criticisms the Amnesty international also advocated the steps forwarded by the Indian government for enhancement of the Human rights in this Jammu and Kashmir region. The concept of the economic rights were also the most debating issue in the context of the Jammu and Kashmir. Since 2019 the pace of the industrialisation was very slow in Jammu and Kashmir region. The Art. 35A And 370 impinged the Jammu and Kashmir in its own. None other opportunities of the development occurred in this region. Most of the economy of the region is based on the primary sector, agriculture. The Kashmir valley is also known for the sericulture and cold water fisheries. Wood from Kashmir is used for the making of the Cricket Bats. Kashmiri saffron is also very famous and brings a handsome amount of foreign exchange in this state but due to the lack of industrialisation most of its raw materials is exported to the Haryana and Punjab. The reason for underdevelopment of the industries were also hindered in the legal provisions of the Art. 370 and 35A. The immovable property rights and other special provisions of the these special articles

dwelled the poverty rate in the Jammu and Kashmir region. After the impeachment of the Art.35A and dilution of Art. 370 has opened the major horizons for the investors and for the industrial sectors. Now the immovable property rights were also transferred into the dustbin box. The overall evaluation of the dilution of Art. 370 and abrogation of Art. 35 A changed the socio-economic status of the people. The basic tenet inclined with the economical aid to Jammu and Kashmir is that there is no audit and record for the expenditure of budget and grant in aids provided by the government. It is because Jammu and Kashmir had in some extents the economic sovereignty but after the abrogation of the special Articles it may be questioned about the expends of the Government. Also now the CAG is responsible for the annual audits of the budgets and expenditure because after the formation of the Union territories it is the subject of CAG. The development of Jammu and Kashmir started from the villages. Development of rural areas is key to overall development of the union territory. The rural sector needs infrastructure to support and ensure significant investments and developmental aids." The government added, "In the recently announced budget for J&K, under MGNREGA, 426 lakh person days are targeted to be generated during 2022-23"¹¹.

What changed on the Ground after the abrogation of 35A & Dilution of 370

The changes occurred on the ground were pleasant. The welfare schemes are increased in the UT'S. "Also, 60,000 job cards are proposed to be issued based on demand and 1 lakh developmental works of different nature will be initiated and expected to be completed." Under Rashtriya Gram Swaraj Abhiyan (RGSA), 1,500 elected representatives will be provided exposure visit outside Union Territory of J&K¹². Capacity building and refresher training will be imparted to 1,12,000 participants (PRIs/Line Department Officers/Officials) in phased manner¹³.

Prime Minister Narendra Modi and the Hindu nationalist Bharatiya Janata Party had long opposed Article 370 and revoking it was in the party's 2019 election manifesto. They argued it needed to be scrapped to integrate Kashmir and put it on the same footing as the rest of India. After returning to power with a massive mandate in the April-May general elections, the government lost no time in acting on its pledge.

Critics of Monday's move are linking it to the economic slowdown that India is currently facing - they say it provides a much-needed diversion for the government. Many Kashmiris believe that the BJP ultimately wants to change the demographic character of the Muslim-majority region by allowing non-Kashmiris to buy land there. Although Home Minister Amit Shah's announcement in parliament on Monday came as a surprise to most Indians, it would have taken the government some preparation to arrive at the decision. The move also fits in with Mr Modi's desire to show that the BJP is tough on Kashmir, and Pakistan. Kashmir will no longer have a separate constitution but will have to abide by the Indian constitution much like any other state. All Indian laws will be automatically applicable to Kashmiris, and people from outside the state will be able to buy property there. The government says this will bring development to the region. I want to tell the people of Jammu and Kashmir what damage Articles 370 and 35A did to the state," Mr Shah told parliament. "It's because of these sections that democracy was never fully implemented, corruption increased in the state, that no development could take place." The government is also moving to break up the state into two smaller, federally administered territories. One region will combine Muslim-majority Kashmir and Hindu-majority Jammu. The other is Buddhist-majority Ladakh, which is culturally and historically close to Tibet.

P Chidambaram, a senior leader in the opposition Congress Party described the decision as a "catastrophic step" and warned in parliament that it could have serious consequences.

"You may think you have scored a victory, but you are wrong and history will prove you to be wrong. Future generations will realise what a grave mistake this house is making today," he said.

The statement of P.Chidambaram is opposed by the feminist active in Jammu and Kashmir. They put the prolonged situation in her Research paper on the human rights of the Women in Jammu and Kashmir region. Kashmir women which have suffered long time from immovable property rights. But in few researches there is a new stance is also observed which claims India army for violation of Human rights. The feminist scholar of Jammu Kashmir centre of studies pointed in her research that the Burka is considered as the symbol of legacy to check. Each and every vehicle is being checked is it specified with Burka wore women.

Conclusion

Human rights are consisted in two terms. The positive rights and the negative rights. Some rights are may be the guise of violation for others. In Jammu and Kashmir the same situation is observed the intervention of state and the security forces may be considered as the forceful restrictions for others. The use of military forces in the Kashmir region is the mode of oppression for the separatist militants. The operation All out is also started for the arrest of the militants but due to cultural similarity they misguided the local people of the Jammu and Kashmir, the fallout of this are that the millions of the youths are drained on the roads against the law and military. In this reference the security forces tried to control the situation by arresting and implementing the Art. 144. Due to maintain law and order the voice of Human rights violation has been overwhelmed by the legal procedure. Yet it is damn true that the arrest and detention were increased in Jammu and Kashmir region. The Right to privacy and Right to life are also hampered at some extent but the consequences of this are later observed that the most of arrest and detention are done for the formation of peace in the respected region. The deployment of Kashmiri Pandits were also the example of the dreadful displacement of the rights and feelings of the people. But here the drawback of the government are experienced that what government has done for the replacement of the Kashmiri Pandits. On this issue government should form the effective committee to investigate the displacement ration of the Kashmiri Pandits and apply the strict rules for the rehabilitation of the Kashmiri Pandits. The insurgent militants arrest blossoms the sprinkle on the local residents. Overall accumulations are experienced that the voice of the human rights were raised by the militant groups for the savage of their life.

References

1. Sharma Aditya (2019) Legal history of Art 370 & 35A and current status. <https://www.legalserviceindia.com/legal/article-863-legal-history-of-article-370-and-35a-and-current-status.html> Last retrieved on 10 Dec, 2022.
2. Explained What are Articles 370 and 35A? Why they are important for J&K.(2022). *The Business standard*. https://www.business-standard.com/article/current-affairs/explained-what-are-articles-370-and-35a-impact-on-kashmir-if-it-is-removed-why-is-bjp-against-article-35a-in-kashmir-mufti-pdp-abdullah-modi-119072900626_1.html Last retrieved on 12 Dec, 2022.
3. Buchanan Kelly (2019) FALQs: Article 370 and the Removal of Jammu and Kashmir's Special Status. <https://blogs.loc.gov/law/2019/10/falqs-article-370-and-the-removal-of-jammu-and-kashmir-special-status/> Last retrieved on 13 Dec, 2022.
4. Buchanan Kelly (2019) FALQs: Article 370 and the Removal of Jammu and Kashmir's Special Status. <https://blogs.loc.gov/law/2019/10/falqs-article-370-and-the-removal-of-jammu-and-kashmir-special-status/> Last retrieved on 15 Dec, 2022.
5. Khan, N. N. (2001). Kashmir Issue and Pakistan's Foreign Policy. *Pakistan Horizon*, 54(1), 9–18. <http://www.jstor.org/stable/41393978> Last retrieved on 17 Dec, 2022.
6. Feminists condemn men's remarks about marrying Kashmiri women. (2019). *The Dawn*. <https://www.dawn.com/news/1498919> Last retrieved on 18 Dec, 2022.
7. Mitra Chenoy Dr. Kamal (2022). Human Rights Violations in Jammu & Kashmir - A Report. <https://www.outlookindia.com/website/story/human-rights-violations-in-jammu-kashmir-a-report/211099> Last retrieved on 19 Dec, 2022.
8. Patel Aakar, chair of Amnesty international (2022). India: Increases in unlawful killings in Jammu and Kashmir highlights Government's failure to protect its minorities. <https://www.amnesty.org/en/latest/news/2022/06/india-increase-in-unlawful-killings-in-jammu-kashmir-highlights-governments-failure-to-protect-its-minorities/> Last retrieved on 21 Dec, 2022.
9. Kamthan Anushka (2021). Human rights violation in Jammu and Kashmir. <https://www.probono-india.in/research-paper-detail.php?id=803> Last retrieved on 22 Dec, 2022.
10. Mohiuddin, L. (1997). Human Rights Violations: A Case Study of Kashmir. *Pakistan Horizon*, 50(2), 75–97. <http://www.jstor.org/stable/41393573> Last retrieved on 24 Dec, 2022.
11. Institute of Peace and Conflict Studies. (2019). Article 370 and the Reorganisation of Jammu and Kashmir. *Institute of Peace and Conflict Studies*. <http://www.jstor.org/stable/resrep19799> Last retrieved on 26 Dec, 2022.
12. Two Years After Article 370 Read Down, Rights Violations Continue: J&K Rights Forum. *The Wire* <https://thewire.in/rights/article-370-two-years-read-down-rights-violations-continue-jk-rights-forum> Last retrieved on 28 Dec, 2022.
13. Two Years After Article 370 Read Down, Rights Violations Continue: J&K Rights Forum. *The Wire* <https://thewire.in/rights/article-370-two-years-read-down-rights-violations-continue-jk-rights-forum> Last retrieved on 28 Dec, 2022.