

EVALUATION OF LABOUR CONDITIONS AND WORKER RIGHTS IN THE TEA INDUSTRY WITH SPECIAL REFERENCE TO CORRAMORE TEA ESTATE

Rahi Masoom¹, Priyanka Swargiary²

¹M. Com 3rd semester, Nalbari Commerce College, Nalbari, Assam

²Assistant Professor, Department. of Economics Nalbari Commerce College, Nalbari, Assam

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ABSTRACT

The Tea Industry is a significant economic sector in India, especially in the Northeastern Regions. The tea industry, being labor-intensive, directly employs millions of workers; hundreds of workers are often employed under challenging conditions in this industry. Against this backdrop, the paper tries to evaluate the labor conditions and worker rights in the tea industry, focusing on the Corramore Tea Estate in Udalguri, Assam.

This study employs a mixed-method approach. Both primary and secondary data are used for the study. Primary data are collected through a structured questionnaire, and survey. Secondary data are collected from journals, newspapers, government reports, etc.

The study reveals that the Tea Estate employs a predominantly female workforce with diverse educational qualifications, ranging from illiteracy to graduation. Working in the tea industry serves as the primary source of income for most workers. However, the study observes that the workers receive remarkably low wages, highlighting concerns

about their economic well-being. The paper suggests that analyzing the working conditions and labor rights can help address the issue of financial well-being and overall labor conditions at Corramore Tea Estate.

The study emphasizes the reliance of Corramore Tea Estate's predominantly female workforce on low wages as their main income source, underscoring the urgent need for improved working conditions and strengthened labour rights to support their economic well-being.

Keywords: Labour Conditions, Worker Rights, Tea Industry, Corramore Tea Estate

INTRODUCTION

India is the second-largest tea producer globally. The main tea-producing states of India are Assam, West Bengal, Tamil Nadu, and Kerala. Assam produces 50% of India's tea. India has a long and rich history with tea, dating back to the early 19th century when the British established tea plantations in Assam. Assam, located in north-eastern India, it quickly became a significant tea-producing region due to its ideal climate and geography for growing tea.

Despite the growth and profitability of the tea industry in India, labor conditions and worker rights have been longstanding issues. Many tea plantation workers in Assam and other regions encounter obstacles like inadequate pay, unsatisfactory working environments, and limited access to essential amenities like healthcare and education. The "abandoned tribes" or "Adivasis", who are often marginalized and exploited due to their socioeconomic status. These workers, often descendants of tribal communities, face discrimination and are vulnerable to unfair labor practices. Another critical issue is the prevalence of contract labor in the tea industry, which results in a lack of job security.

Worker rights in the tea industry have been a point of debate, with concerns raised about the lack of collective bargaining power for laborers. Trade unions have faced challenges in organizing workers and advocating for their rights, leading to a disparity in power dynamics between labor and management. It is crucial for participants in the tea industry such as government authorities, plantation owners, trade unions, and community organizations, should work together and address these labor issues. Improving wages, working conditions, and access to social welfare programs for tea plantation workers is essential to ensure a more equitable and sustainable industry.

There is limited focus on how specific regional policies and regulations in Assam affect tea garden workers. Investigating the impact of local labor laws, government interventions, and industry-specific regulations on worker rights and conditions could provide valuable insights for policy improvement. Research in Assam often addresses

labour conditions in a general sense, but there is a lack of intersectional analysis that considers how factors such as ethnicity, caste, gender, and socio-economic status interact to affect workers' experiences. Analysing these intersecting factors could reveal deeper insights into the unique challenges faced by different groups of workers within Assam's tea industry. There is a need for detailed studies on the effectiveness of trade unions and other forms of worker representation in Assam's tea industry. Research could focus on successful case studies of unionization efforts, the role of local labour organizations, and how they impact workers' ability to negotiate better conditions and rights. The tea industry in Assam is experiencing changes due to economic developments and technological advancements. There is a gap in understanding how these changes affect labour conditions, such as the introduction of mechanization or shifts in market demand. Research could explore how these factors influence employment patterns, wage structures, and working conditions. Existing studies highlight general poor health and safety conditions but lack specific research into the prevalence and management of occupational health issues in Assam's tea gardens. Investigating specific health hazards, the effectiveness of health services, and preventive measures could provide a clearer picture of workers' health and safety challenge. While. There is limited research on the effectiveness of recent reforms and initiatives aimed at improving labour conditions in Assam's tea industry. Evaluating the impact of these interventions, including government programs and NGO initiatives, can provide insights into their success and areas for improvement.

The rationale for focusing on Corramore Tea Estate:

Corramore Tea Estate is significant in the tea industry, and its labor practices reflect broader industry-wide concerns. It is Located in Udalguri, Assam, India, Corramore Tea Estate is situated in a region notorious for labor rights violations. As a large tea estate, Corramore has a substantial workforce, making it an ideal case study for examining labor conditions and worker rights. By addressing labor issues at Corramore, the estate can set a positive precedent for the broader tea industry.

LITERATURE REVIEW

Sen (2022) explores labour rights in India, focusing on the legal framework, constitutional provisions, and judicial efforts to safeguard workers' interests and enhance labour conditions^[11]. Lyon highlights the role of working conditions and workers' rights in shaping electoral preferences and political dynamics within the Democratic Party, underlining their influence on political support^[7]. Bhattacharya (2014) critiques contemporary discussions on labour, emphasizing the need for a holistic view of labour rights, including issues of worker exploitation and alienation within capitalism^[3]. Yusifli (2022) discusses the potential for recognizing safe and

healthy working conditions as fundamental human rights, reflecting the evolving understanding of workers' rights under the International Labour Organization^[14]. Carden & Hall (2009) argue that economic development is the primary driver of improved labour conditions, rather than mandated labour standards, stressing the importance of economic progress over regulatory measures^[4]. Mittal (2024) investigated that historically, migrant workers in the Indian tea industry faced poor conditions due to colonial influences, low wages, malnutrition, minimal healthcare, accidents, and closures, necessitating research for improved living standards^[8]. Yasmin & Siddique (2024) have observed that the history of labourers moving from Chotanagpur to North-Eastern tea plantations during the British period highlights exploitative conditions and generational servitude in the tea industry^[13]. Siegmann & Sathi (2022) explores that unfree labour has been integral to South India's tea industry since colonial times, with economic and social coercions shaping workers' conditions, including long hours, low pay, and gendered obstacles^[12]. Behal (2024) has found out that labour conditions in the Assam Valley tea industry involved indentured migrant workers, with employment rising from 107,847 in 1885 to 247,760 in 1900, reflecting significant growth and exploitation^[1]. Das (2023) has recently discussed that the tea industry in eastern India has seen oppressive labour conditions since colonial times, with the Chargola Exodus of 1921 marking an early organized protest against bondage labour, reflecting enduring challenges^[5]. Mittal (2024) discussed that migrant workers in the Indian tea industry face poor living conditions, low wages, and minimal rights, necessitating further research to improve their situation, especially focusing on women labourers^[8]. Niroshini (2024) observed that the paper highlights challenges encountered by female workers in the tea industry, including inadequate wages, poor healthcare, and marginalization in terms of workforce casualization, occupational mobility, and union representation^[9]. Bhattacharya (2024) has found in his study, the dire livelihood crisis faced by tea garden workers in Dooars, West Bengal, emphasizing the need to address their socioeconomic conditions and prevent migration for sustenance^[2]. Saha et al. (2023) their research paper discusses rising wage theft in the tea industry due to ineffective labour market institutions, leading to labour rights violations and social rights infringements among tea plantation workers^[10]. Kuasha et al. (2024) their study highlights low wages, lack of education, limited human rights awareness, and ineffective trade unions among tea workers at Doldoli Tea Garden, emphasizing the need for improved labour conditions^[6].

OBJECTIVES

- To analyse the financial status of tea garden workers
- To examine the working conditions of tea garden workers

RESEARCH METHODOLOGY

The study employs a comprehensive mixed methods approach that integrates quantitative and qualitative research methodologies to comprehensively analyze the subject matter. By utilizing this approach, the study aims to capture a broader spectrum of insights and data that can enrich the understanding of the examined phenomena.

Primary and secondary data are utilized for the quantitative aspect of the research. The primary data is gathered using a systematic questionnaire designed to gather numerical data from participants in a systematic manner. This structured approach ensures that responses can be easily quantified and analyzed statistically. Additionally, a survey is conducted to collect further quantitative data, allowing for a broader reach and gathering diverse perspectives.

On the other hand, secondary data plays a crucial role in informing the research findings. This is gathered from various existing resources, including academic journals, newspapers, and government reports. By integrating insights from both primary and secondary data, the study aims to enhance the reliability and depth of its conclusions, ultimately contributing to a more nuanced understanding of the research topic.

Study Area

The study area for this research paper is Corramore Tea Estate.

Corramore Tea Estate is a well-known tea estate in Assam, India, and is located in the Udalguri district, Assam, India acquired by McLEOD RUSSEL in 1994.

Corramore Tea Estate is known for its flavourful and aromatic teas, produced using a combination of traditional and modern methods. The tea estate is spread over 480 hectares. It is certified by Fairtrade, Organic, and Rainforest Alliance.

The estate was founded in the 1860s by Robert Logan, a Scottish farmer, and has been producing exceptional tea for over 120 years with its rich history and heritage, Corramore Tea Estate is now a part of the Williamson Tea family (A Williamson Magor Group Enterprise), known for its high-quality tea production. The Regd office of the tea estate is located in Four Mangoe Lane Surendra Mohan Ghose Sarani Kolkata, West Bengal, India.

Population size

All the labors of the Corramore Tea Estate.

Size of the Sample

The sample size for studies on labor conditions and worker rights in Corramore Tea Estate and other tea estates in Udalguri, Assam, India., the tea plantation workers were randomly selected, and a total of 60 workers (39 females and 21 males) took part in this discussion for the study.

DATA ANALYSIS

Age of the Respondents

Age	Count of Respondents	Percentage
Under 20	0	0%
20 -29	16	26.67%
30 - 39	26	43.33%
40 - 49	15	25%
50 or older	3	5%
Total	60	100%

Table 1 : Age of the Respondents

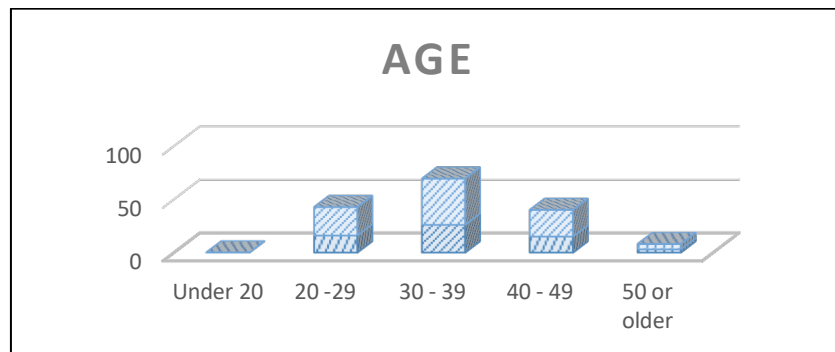


Figure 1 : Age of the Respondents

The above table and graph reveal that out of a total of 60 respondents, there were not any respondents who were under 20 years old, 26.67% of respondents were aged 20 to 29, and the age range between 30 to 39 is 43.33%, the age range between 40 to 49 is 25%, the age of 50 or older was 3%.

Gender of the Respondents

Gender	Respondent's count	Percentage
Male	21	35%
Female	39	65%
Non-Binary	0	0%
Prefer not to say	0	0%
Total	60	100%

Table 2 : Gender of the Respondent

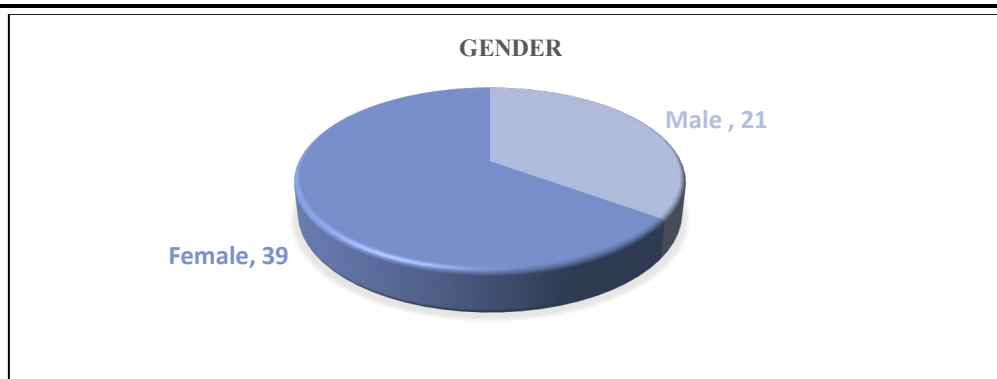


Figure 2 : Gender of the Respondent

The above table and graph reveal that out of a total of 60 respondents, there were not any respondents who were non-binary, 35% of respondents were male and 65% of respondents were female.

Education Level of the Respondents

Education level	No. of respondents	Percentage of Respondents
No formal education	2	3.33%
Primary Education	10	16.67%
Secondary Education	25	41.67%
Vocational Training	50	83.33%
Higher education	23	38.33%
Total	60	100%

Table 3 : Education Level of the Respondents

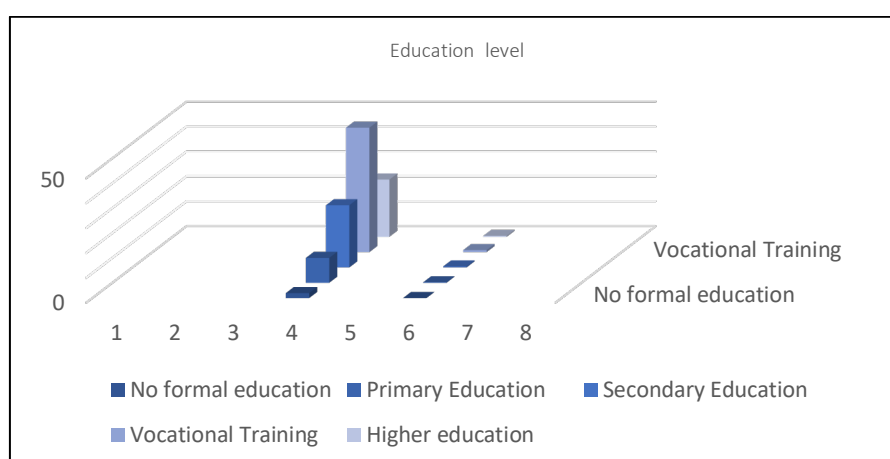


Figure 3 : Education Level of the Respondents

The above table and graph reveal that out of a total of 60 respondents, 3.33% of respondents didn't get any formal education, 16.67% of respondents completed primary education, 41.67% of respondents completed secondary education and

83.33% of respondents got vocational training and 38.33% of respondents completed higher education.

Employment Duration

Employment duration	No. of respondents	Percentage of respondents
Less than 1 year	3	5%
1-3 years	8	13.33%
4-6 years	11	18.33%
7-10 years	26	43.33%
More than 10 years	12	20%
Total	60	100%

Table 4 : Employment Duration

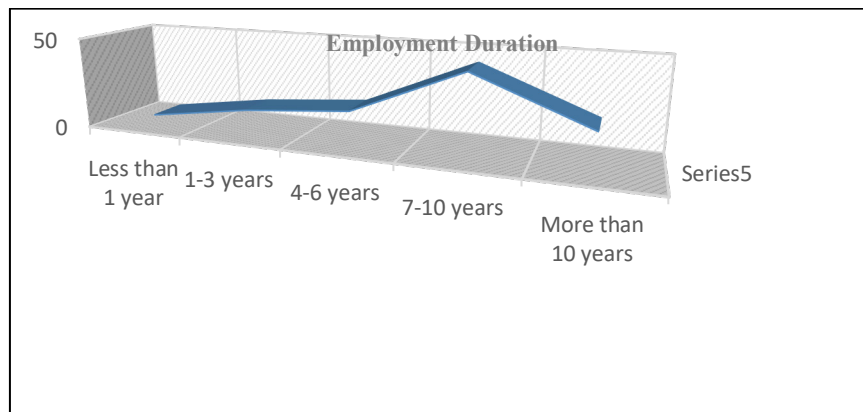


Figure 4 : Employment Duration

The above table and graph represent the employment duration of respondents, it reveals that out of 60 respondents, the employment duration of 5% of employees was fewer than 1 year, 13.33% were 1 - 3 years, 18.33% were 4 - 6 years 43.33 % were 7 - 10 years and 20% were more than 10 years.

Job Position of the Respondents

Job Position	No. of respondents	Percentage of the respondents
Field Worker	52	86.67%
Supervisor	1	1.67%
Manager	1	1.67%
Administrative Staff	3	5%
Other	3	5%
Total	60	100%

Table 5 : Job Position of the Respondents

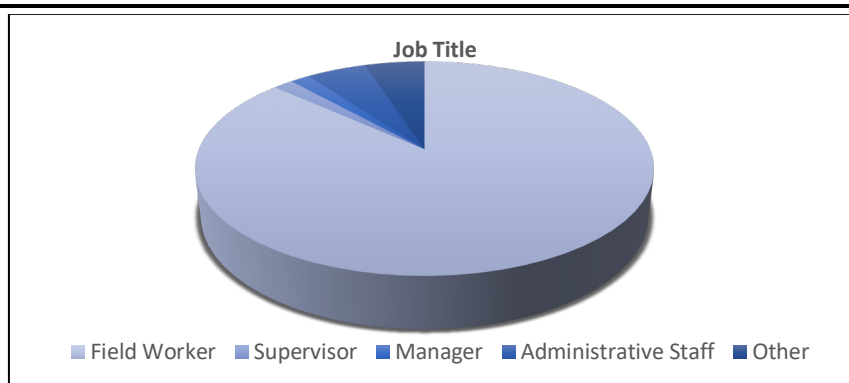


Figure 5 : Job Position of the Respondents

In the above table and diagram, out of 60 respondents, there was 86.67% of respondents were field workers, 1.67% respondents were supervisors, 1.67% respondents were managers, 5% respondents were administrative staff and 5% respondents were other employees including production workers and drivers.

Monthly Wage of the Respondents

Monthly Wage	No. of respondents	Percentage of the respondents
Less than ₹ 3000	0	0%
Less than ₹ 5000	47	78.33%
Less than ₹ 7000	8	13.33%
Less than ₹ 9000	0	0%
Less than ₹ 12000	0	0%
Total	55	100%

Table 6 : Monthly Wage of the Respondents

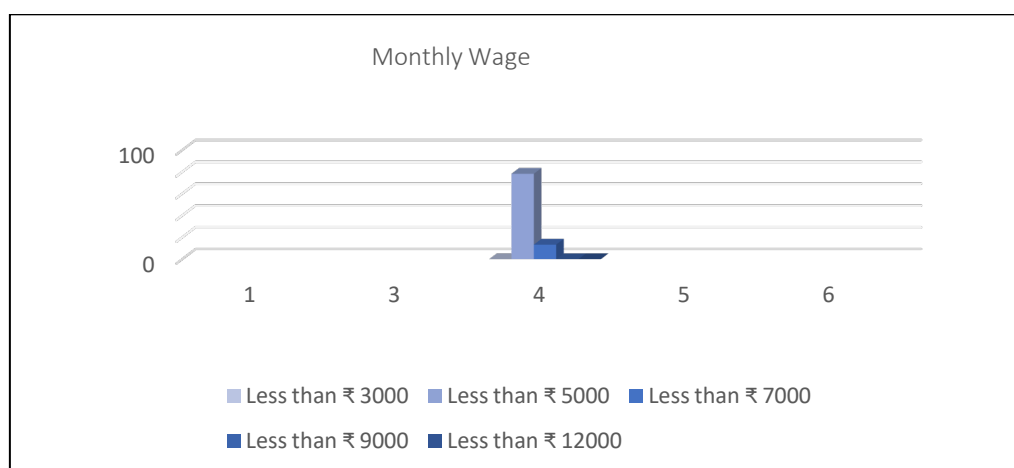


Figure 6 : Monthly Wage of the Respondents

The above table and graph reveal the monthly wage of the workers, out of 55 field and production workers, the monthly wage of 78.33% of workers was less than ₹5000 and 13.33% of workers got less than ₹7000 monthly wage.

Working Hours

Working hours per week	No. of respondents	Percentage of respondents
Less than 40 hrs	0	0%
40-50 hrs	60	100%
50-60 hrs	0	0%
more than 60 hrs	0	0%
Total	60	100 %

Table 7 : Working Hours

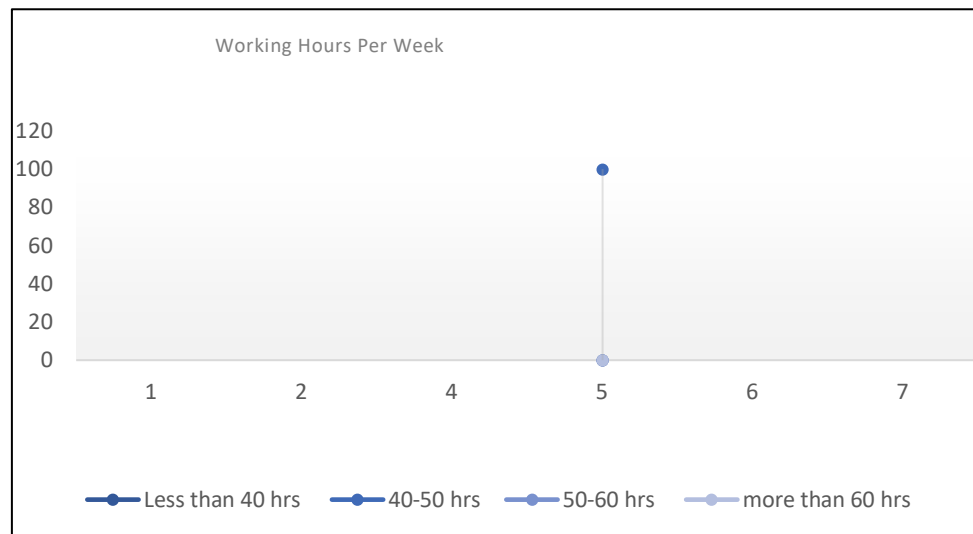


Figure 7 : Working Hours

The above table and graph reveal that out of 60 workers, 100% workers work 40 to 50 hrs per week.

Additional Financial Benefits

Additional Financial Benefit	No. of respondents	Percentage of the respondents
Yes	60	100%
No	0	0%
Total	60	100%

Table 8 : Additional Financial Benefits

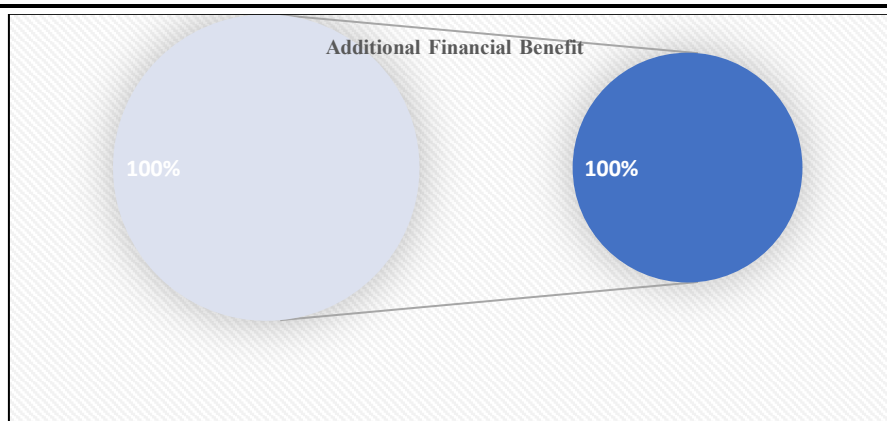


Figure 8 : Additional Financial Benefits

The above table and diagram reveal that out of 60 respondents, 100% of the respondents agree that they do receive additional financial benefits.

Current wage satisfaction

Current Wage Satisfaction	No. of respondents	Percentage of the respondents
Very Satisfied	3	5%
Somewhat Satisfied	2	3.33%
Neutral	30	50%
Somewhat dissatisfied	25	41.67%
Very dissatisfied	0	0%
Total	60	100%

Table 9 : Current wage satisfaction

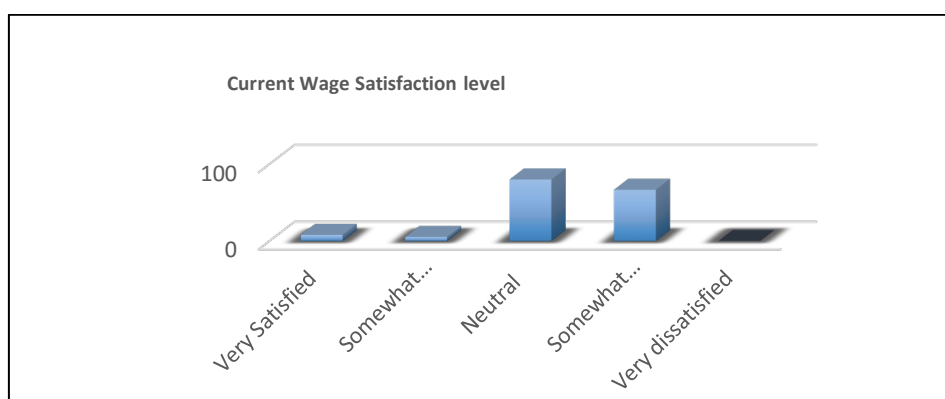


Figure 9 : Current wage satisfaction

The above table and graph reveal that out of 60 respondents 5% of respondents were very satisfied with the current wage level, 3.33% of respondents were somewhat satisfied, 50% of respondents were neutral, and 41.67% of respondents were somewhat dissatisfied.

Opinion of the respondents on the current wage level as per the Industry Standard

Opinion on wage level as per the industry standard	No. of respondents	Percentage of the respondents
Much Below Industry Standard	28	46.67%
Below Industry Standard	27	45%
At par with Industry Standard	5	8.33%
Above Industry Standard	0	0%
Much Above Industry Standard	0	0%
Total	60	100%

Table 10 : Opinion of the respondents on the current wage level as per the Industry Standard

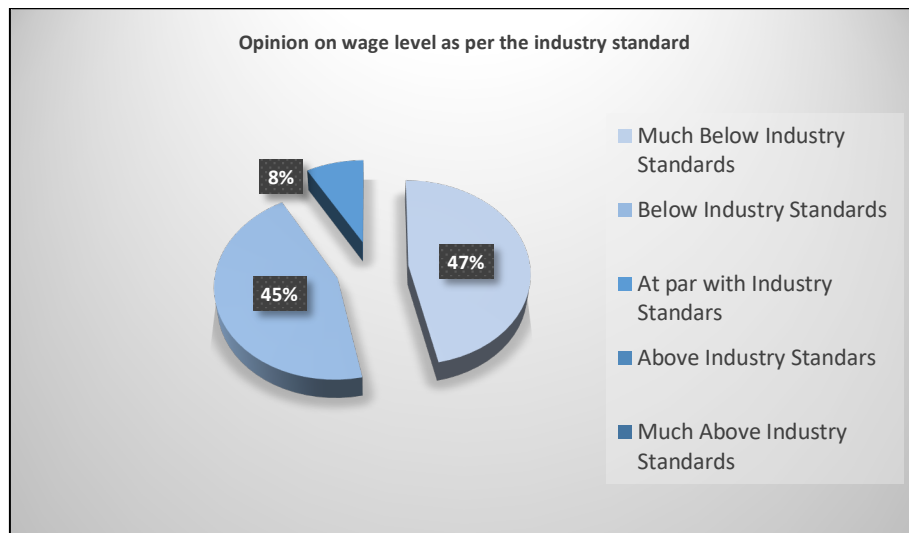


Figure 10 : Opinion of the respondents on the current wage level as per the Industry Standard

Opinion on the fairness of the wage

Whether the wage is fair	No. of respondents	Percentage of respondents
Yes	3	5%
No	55	91.67%
Unsure	2	3.33%
Total	60	

Table 11 : Wages Fairness

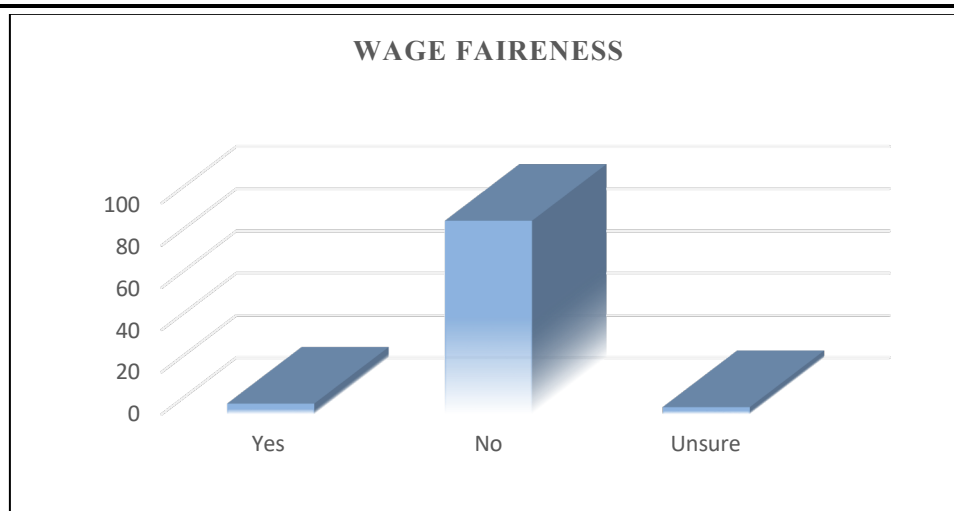


Figure 11 : Wages Fairness

The above table and diagram reveal that out of 60 respondents, 46.67% of respondents believed that the wage level was much below the industry standard, 45% believed that the wage level was below the industry standard, and 8% of the respondents believed the wage was at par with industry standard.

Overall Safety of the Working Environment

Overall safety	No. of respondents	Percentage of respondents
Very safe	0	0%
Safe	42	70%
Neutral	16	26.67%
Unsafe	2	3.33%
Very unsafe	0	0%
Total	60	100%

Table 12 : Overall Safety of the Working Environment

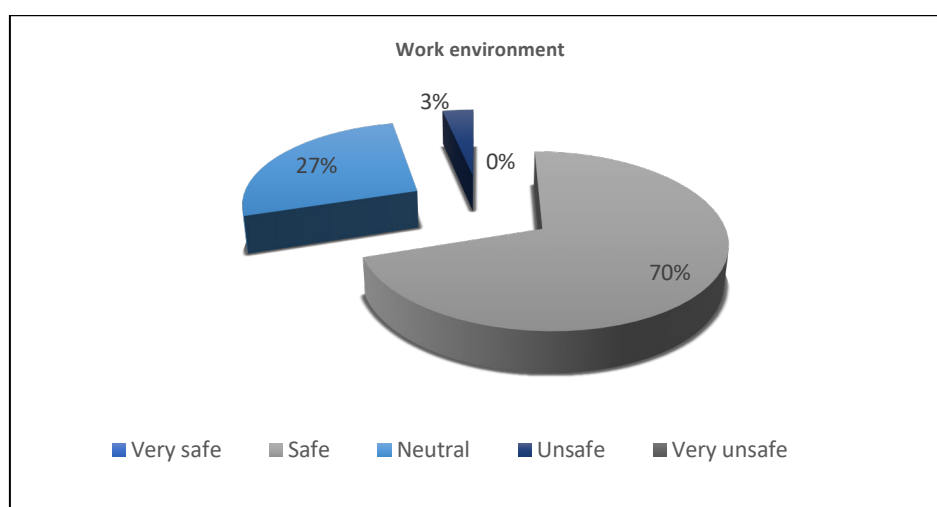


Figure 12 : Overall Safety of the Working Environment

The above table and diagram reveal that out of 60 respondents, 70% believed that the work environment is safe, 26.67% believed the safety of the work environment is neutral, and 3.33% believed that the work environment is not safe.

The attitude of the management toward the protection of workers' health.

Attitude of the management	No. of respondents	Percentage of respondents
Very poor	0	0%
Poor	1	1.67%
Neutral	39	65%
Good	20	33.33%
Excellent	0	0%
Total	60	100%

Table 13 : Attitude of the management toward the protection of workers' health

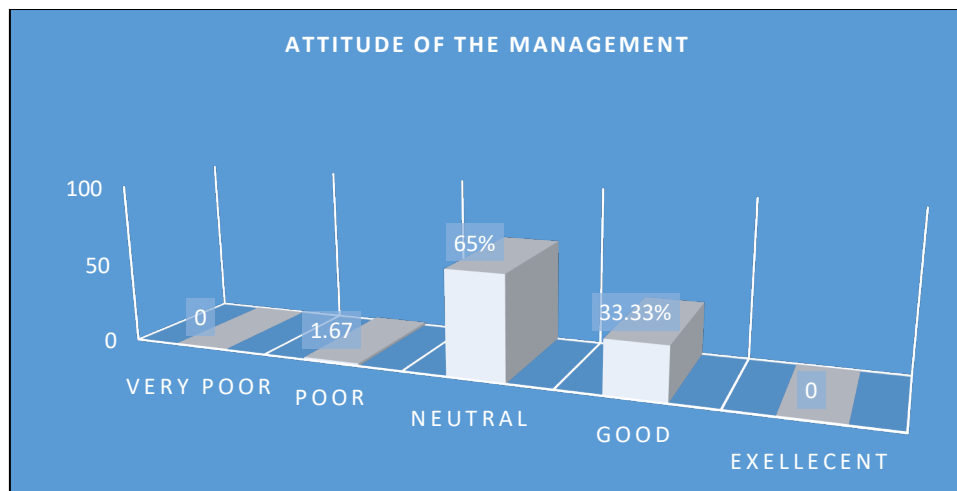


Figure 13 : Attitude of the management toward the protection of workers' health

The above table and graph reveal that out of 60 respondents, 1.67% of respondents believed that the attitude of the management toward the protection of workers' health is poor, 65% of respondents were neutral, and 33.33% of respondents believed that the attitude of the management toward the protection of workers' health is good.

Adequate facilities for rest and meals during work hours

Adequate facilities	No. of respondents	Percentage of respondents
Yes	2	3.33%
No	58	96.67%
Total	60	100%

Table 14 : Adequate facilities for rest and meals during work hours

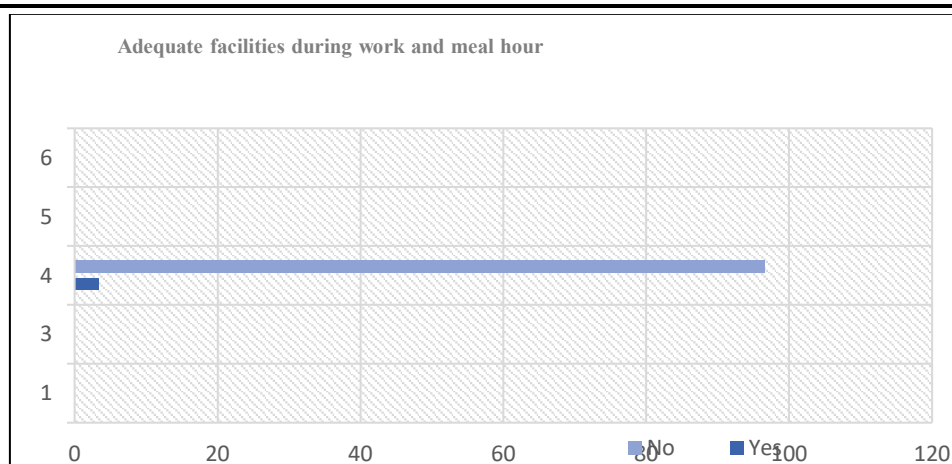


Figure 14 : Adequate facilities for rest and meals during work hours

The above table and graph reveal that out of 60 respondents, 3.33% of respondents agree that there were adequate facilities for rest and meals during work hours, and 96.67% of respondents disagree that there were adequate facilities during work and meal hours.

Access to protective equipment (e.g., gloves, masks).

Access to any protective equipment	No. of respondents	Percentage of respondents
Always	60	100%
Sometimes	0	0%
Rarely	0	0%
Never	0	0%
Total	60	100%

Table 15 : Access to protective equipment (e.g., gloves, masks).

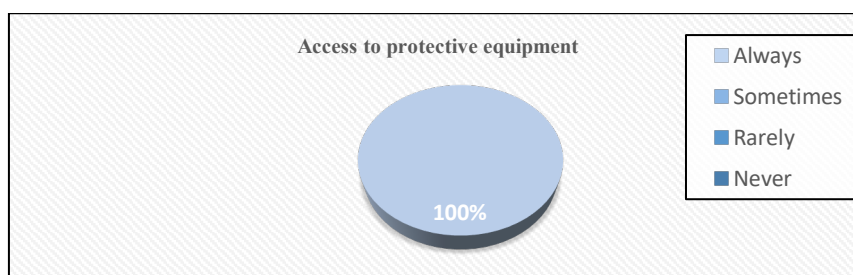


Figure 15 : Access to protective equipment (e.g., gloves, masks)

A system in place for reporting and addressing safety hazards.

A system in place for reporting	No. of Respondents	Percentage of respondents
Yes	60	100%
No	0	0%
Unsure	0	0%

Total	60	
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Table 16 : A system in place for reporting and addressing safety hazards.

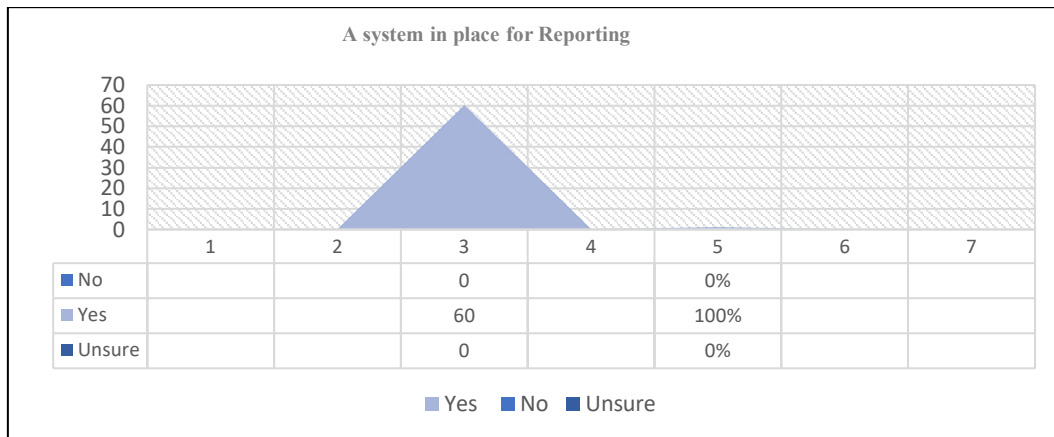


Figure 16 : A system in place for reporting and addressing safety hazards.

The above table reveals that out of 60 respondents, 100% of respondents agree that there is a system in place for reporting and addressing safety hazards.

The overall working conditions in terms of comfort and cleanliness

Cleanliness and Comfort	No. of respondents	Percentage of respondents
Excellent	2	3.33%
Good	43	71.67%
Average	15	25%
Poor	0	0%
Very Poor	0	0%
Total	60	100%

Table 17 : The overall working conditions in terms of comfort and cleanliness

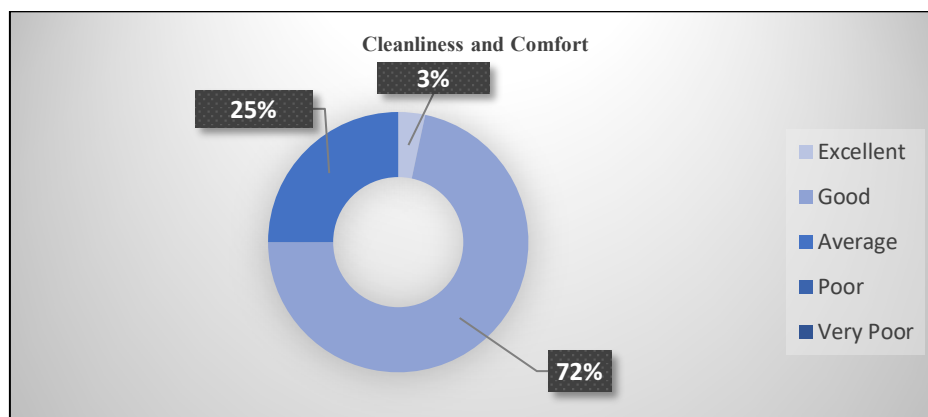


Figure 17 : The overall working conditions in terms of comfort and cleanliness

The above table and diagram reveal that out of 60 respondents, 3.33% of respondents rated that the overall working conditions in terms of comfort and cleanliness were excellent, 71.67% of respondents rated good, and 25 % of respondents rated average.

FINDINGS

- i. The data indicates that the majority of respondents fall within the 30 to 39 age range, comprising 43.33% of the total, while no respondents were under 20 years old. This highlights a demographic skew towards younger to middle-aged adults among the surveyed population.
- ii. The data indicates a gender distribution among the respondents, with 35% identifying as male and 65% as female, while no respondents identified as non-binary. This highlights a significant majority of female respondents in the sample.
- iii. The data indicates that a significant majority of respondents, 83.33%, received vocational training, while a notable portion, 38.33%, achieved higher education, highlighting the diverse educational backgrounds among the participants.
- iv. The data indicates that a significant portion of respondents, specifically 43.33%, have been employed for 7 to 10 years, highlighting a trend towards longer employment durations among the surveyed group.
- v. The data indicates that a significant majority of the respondents, 86.67%, were field workers, highlighting the predominance of this group within the surveyed population. This distribution underscores the essential role of field workers in the overall workforce composition.
- vi. All 60 workers have a uniform schedule of 40 to 50 hours per week, indicating a consistent workload.
- vii. All 60 respondents unanimously acknowledge receiving additional financial benefits, highlighting a strong consensus on the financial advantages experienced.
- viii. The data indicates that a significant portion of respondents, 50%, remain neutral regarding their wage satisfaction, while a combined total of 41.67% express some level of dissatisfaction, suggesting a general discontent with the current wage levels among the majority.
- ix. Over 91% of respondent's view wage levels as inadequate, believing they fall below industry standards, highlighting a critical concern about compensation.
- x. The data shows that 92.67% of respondents consider the wage unfair, indicating widespread dissatisfaction. Only a small minority view it as fair, suggesting a need to re-evaluate compensation practices.
- xi. The data shows that 70% of respondents view the work environment as safe, while only 3.33% see it as unsafe, indicating a generally positive perception of workplace safety.

- xii. Most respondents view management's attitude toward worker health protection as neutral or good, with few expressing negativities indicating a generally favourable perception of management's commitment.
- xiii. The data shows significant dissatisfaction among respondents about the adequacy of rest and meal facilities during work hours, indicating a critical need for improvement in workplace amenities.
- xiv. All respondents confirm the availability of necessary protective equipment, indicating a strong commitment to workplace safety and ensuring employees are well-equipped for their tasks.
- xv. The data shows unanimous agreement among respondents on the existence of a system for reporting safety hazards, indicating a strong perception of safety management in the organization.
- xvi. The data shows that 71.67% of respondent's view working conditions as good, with few ratings as excellent, indicating potential for improvement in comfort and cleanliness.

RECOMMENDATIONS

After analyzing the data, the authors recommend implementing comprehensive training programs focusing on agricultural best practices, safety protocols, and workers' rights that can empower workers and improve productivity, establishing reasonable working hours that comply with labour laws, and ensuring that workers are not overworked. Implementing a system for monitoring working hours can contribute to achieving a healthy balance between professional and personal life.

The authors also recommend to ensure all labours are compensated with a living wage that accurately represents the expenses associated with daily life of living in their area. Regular wage reviews and adjustments based on inflation and market conditions can help maintain fairness.

Providing designated areas for rest and meals, ensuring that workers have access to nutritious food and sufficient breaks during their shifts. This can improve overall morale and productivity.

Formation of health and safety committees to address workplace concerns collaboratively.

By focusing on these areas, the tea industry can create a more sustainable and equitable working environment for its employees.

CONCLUSION

The study underscores the significant reliance of the predominantly female workforce at Corramore Tea Estate on low wages, which are often insufficient to meet their basic needs and support their families. This situation not only highlights the economic vulnerability of these workers but also points to a broader systemic issue within the agricultural sector.

The findings of the study reveal a pressing necessity for improved working conditions that go beyond mere wage increases. This includes ensuring safe and healthy work environments, access to necessary facilities, and the provision of adequate breaks and support services. Such improvements are essential not only for the physical well-being of the workers but also for their mental and emotional health, which can significantly impact their productivity and overall quality of life.

Moreover, Empowering the workforce through education about their rights and providing avenues for collective bargaining can help them advocate for better pay and conditions.

Ultimately, addressing these issues is crucial for promoting the economic well-being of the female workforce at Corramore Tea Estate. By enhancing their working conditions and reinforcing their labor rights, a more equitable and sustainable agricultural industry, where workers are valued and compensated fairly for their contributions can be created. This, in turn, can lead to improved economic stability for the workers and their families, fostering a healthier community and a more resilient economy overall.

REFERENCE

- [1] Behal, R. P. (2024). Labour Resistance in Indenture Plantations in the Assam Valley. 62–84. <https://doi.org/10.1017/9781009339810.004>
- [2] Bhattacharya, D. (2024). Study on livelihood crisis and socio-economic condition of tea garden workers in Dooars of West Bengal. *International Journal for Multidisciplinary Research*, 6(3). <https://doi.org/10.36948/ijfmr.2024.v06i03.23198>
- [3] Bhattacharya, S. (2014). Is labour still a relevant category for Praxis? Critical reflections on some contemporary discourses on work and labour in capitalism. *Development and Change*, 45(5), 941–962. <https://doi.org/10.1111/dech.12123>
- [4] Carden, A., & Hall, J. (2009). FOUR PROPOSITIONS ABOUT INTERNATIONAL LABOUR STANDARDS. *Economic Affairs*, 29(4), 78–79. <https://doi.org/10.1111/j.1468-0270.2009.01951.x>
- [5] Das, B. (2023). Hundred Years of Chargola Exodus: Changes and Continuity in the Tea Plantations in Eastern India. *Contemporary Voice of Dalit*, 2455328X2311696. <https://doi.org/10.1177/2455328x231169637>
- [6] Kuasha, N. A., Sarkar, M., & Das, T. (2024). An investigation on livelihood status of tea workers at Doldoli Tea Garden, Sylhet. *Journal of Agroforestry and Environment*, 17(1), 13–19. <https://doi.org/10.55706/jae1703>
- [7] Lyon, G. (2019). Working conditions, workers' rights, and candidate preference in the 2016 Democratic primary. *Public Opinion Quarterly*, 83(4), 805–816. <https://doi.org/10.1093/poq/nfz047>
- [8] Mittal, A. (2024). SS17-01 MIGRANT WORKERS IN THE TEA PLANTATION SECTOR. *Occupational Medicine*, 74(Supplement_1), 0. <https://doi.org/10.1093/occmed/kqae023.0129>
- [9] Niroshini.V. (2024). Challenges of women workers in tea plantation industry. *International Journal for Multidisciplinary Research*, 6(2). <https://doi.org/10.36948/ijfmr.2024.v06i02.17807>
- [10] Saha, D., Bhue, C., & Singha, R. (2023). Rising wage theft in tea industry: consequences of ineffective labor market institutions. *Labor History*, 65(1), 23–39. <https://doi.org/10.1080/0023656x.2023.2243472>
- [11] Sen, A. (2022). RIGHTS OF LABOUR IN INDIA. *THE JOURNAL OF UNIQUE LAWS AND STUDENTS*, I(IV). <https://doi.org/10.59126/v1i4a9>
- [12] Siegmann, K. A., & Sathi, S. (2022). Unfreedoms in south India's tea value chain: reproduction and resistance. *Globalizations*, 19(6), 971–988. <https://doi.org/10.1080/14747731.2022.2047437>

- [13] Yasmin, B., & Siddique, G. (2024). Plateaus to Foothills: The Historical Migration of Tea Garden Labourers from Chotanagpur to North-Eastern Tea Plantation Zones of India during the British Period. *Journal of Migration History*, 10(1), 42–62. <https://doi.org/10.1163/23519924-10010002>
- [14] Yusifli, Z. (2022b). Workers rights and human rights: toward a new fundamental principle? In Edward Elgar Publishing eBooks (pp. 107–125). <https://doi.org/10.4337/9781788977371.00011>

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