



## Politics of the Caste Certificate in India: A Case-Study of Kandhamal Riots

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The 1950 Presidential Order, restricting Scheduled Caste (SC) status to Hindus (later Sikhs/Buddhists), sparked a crisis in Indian secularism by ignoring caste discrimination within Christianity and Islam, a silence maintained by early Indian leaders. While secularists prioritized minority rights without talking of Dalit Christian or Dalit Muslim, the so called communal forces opposed to reservation of Dalit Christians and Dalit Muslims due to the fears of mass conversion. However, this position is contradictory, as conversion continues regardless, as seen in Kandhamal. This paper examines the pivotal role of the caste certificate in the decision to undergo religious conversion, specifically within the context of the Kandha-Pana conflict in Kandhamal. Central to this tension is the Pana community's demand for Scheduled Tribe (ST) status. Under current Indian law, Dalit Christians (SCs) lose reservation benefits upon conversion, while Scheduled Tribes (STs) like the Kandhas retain them. By interrogating the 1950 Presidential Order and employing ethnographic methods, this paper explores how the exclusion of Dalit Christians from the reservation system drives Panas to seek ST status as a means of socio-economic survival. Ultimately, the research bridges the gap between the theoretical politics of caste identity and the practical lived experiences of converts in Kandhamal.

**Key Words:** Caste Certificate, Conversion, Kandhamal, 1950 Presidential Order, Secularism

Justice S C Mohapatra said in his interim report on the 2007-08 Kandhamal violence that “the violation in Kandhamal was the result of concentrated discontentment prevailing among the people since long. They relate to conversion-reconversion, land grabbing & non-maintenance of land records and fake certificates”. He, however, does not elaborate on the conversion and reconversion issues but says that “in spite of the Orissa freedom of religion act, illegal conversions were taking place which created discontentment”. To him, suspicion among the Scheduled Tribe and Scheduled Caste inhabitants of Kandhamal is the main cause of riots with the tribal suspecting that

'Pana' dalits are capturing their land through fraudulent means. Besides the issues of land and conversion and re-conversion, Justice Mohapatra says fake certificate is another major factor that creates discontent among Kandhatribals who constitute 52 per cent of Kandhamal's population. (See Sunday pioneer, today issue, 22nd July 2009 [www.dailypioneer.com/190733/Kandhamal-lies-nailed.html](http://www.dailypioneer.com/190733/Kandhamal-lies-nailed.html)) The 28 page long report says that land is being grabbed by the 'Pana'. It is a fact that a section of the 'Pana' has encroached upon the vast stretches of land which originally belong to the 'Kandhas'. As per the land regulation law of Orissa, nontribal can neither buy nor take possession of land from tribal owners. Along with these lines, the report says that many 'Pana' Christians who have lost their SC tag after conversion to Christianity has managed to secure a false certificate. Some of the 'Pana' Christians also submit their fake tribal certificate for the government jobs and to grab land and reap quota benefits in education.

In his PhD (Mishra, 2015), the author has discovered that religious conversion in Kandhamal as a multifaceted phenomenon has been driven by various socio-political motivations, Among these motivations, the 'caste certificate' emerges as a pivotal factor, often serving as the primary determinant for individuals contemplating conversion. In fact, the 'politics of the caste certificate' has intensified the historical Kandha-Pana conflict, specifically through the demand of the Kui-speaking Panacommunity for Scheduled Tribe (ST) status. This demand is rooted in the structural disparities between the Scheduled Caste (SC) and Scheduled tribe (ST) on reservation systems. Under the current Indian constitutional provisions, a member of a Scheduled Tribe (such as the Kandha) retains their ST status regardless of religious conversion. In contrast, a member of a Scheduled Caste (such as the Pana) forfeits their SC status upon converting to Christianity or Islam. Consequently, to secure long-term access to affirmative action benefits in post-conversion, the Pana community seeks reclassification of its community as an ST. In 1981, the state government forwarded a recommendation to central government,



seeking tribal status to Kui speaking Pana Christians (Lingaraj 2008). In 1991, Pana Christian elite leaders formed PhulbaniKui Jana KalyanaSangha (PKJS) at Bhubaneswar, whose office bearers were all Panas (ibid.). The PKJS started vigorous campaign for providing ST status to Kuispeaking Pana Christians at different levels. They claimed that their language is Kui. They said that they too dwelled in the forests until the government notified them as SCs in 1956. Further, they asserted 'we have the same festivals, the same marriage and death rituals. We have the same mother tongue i.e. Kue, so why should we not be considered tribals' (Times of India, Delhi Edition, Oct 12, 2008: 12).

With the demand of ST status by Pana Christians on the claim of having same culture as Kandha especially in the context of language, Kandhas started a direct conflict with Panas who, they believed, had fraudulently sought to become competitors in their legitimate entitlement. The Kandhas were afraid that their current access to opportunities would be substantially curtailed if the Panas, with their better education and exposure, were made to compete with them. The Kandhas were determined not to allow this under any circumstances (Mohanty 2008). However, the people's mobilization by PKJS generated cultural backing to obtain the ST status. On the other hand, the Kandha community got angry over this development. The Kandha leaders of PhulbaniKuiSamanyaSamiti (PKSS), a tribal forum, decided to counter PKJS in an aggressive manner. They saw it a forum of Panas to encroach on their language in order to claim ST status. Mainly, three fears gripped the Kandha mind: fear of losing linguistic identity, fear of assimilation on linguistic line, and fear of marginalization with regard to resources. Consequently, tribals took to violence several times to disassociate Panas from their claim (Roul 2014). To understand the hatred of Kandhas towards Panas, it is essential to understand Kandha-Pana relationship in Kandhamal.

When Pana came to Kandhamal, Kandha whose name has been used to name the district Kandhamal, welcomed them with open heart and gave them shelter in their villages and they in turn acted as mediator between Kandhas and Oriyas and worked as weavers and petty traders (Thaidy 1965; Pathy 1976 & 1995). Along with it, they were performing two functions: first, they were working as serfs to Kandhas. So "Kandha raja, Panapraja" was the popular catch phrase of the time and it has been prevailing till today (Mohanty 2008; Lingaraja 2008), second, they were working as the Meriah provider to Kandhas for which they were given land

as reward for their service to Kandhas (Mahapatra and Bhattacharya 1996). Meriah practice, to Kandhas, is a tradition where they kill human child for their betterment. The Kandha never use anybody of their own community as a Meriah. So, Panas acted as brokers who were supplying Meriah child to the tribal community. When Panas failed to supply Meriah child, they even sacrificed their children for the tribal Meriah practice to appease mother goddess (Mohanty 2008).

F.G. Bailey noted the following about the relations between Kandhas (whom he refers to as Kond) and Panas (whom he refers to as PAN): "The correct traditional behaviour between a Kond and a PAN symbolizes their relative political and economic status. The PAN takes cooked food and water from a Kond: but a Kond cannot take these things from a PAN without being polluted. A PAN may not enter a Kond house, because his presence would pollute it and render necessary a ritual cleansing. Equally a Kond will not go into a PAN house, though in this case it is not the house which is polluted but the intruder. Touch defiles. The Kond addresses a PAN as „son“ or „child“ while the latter must reciprocate with „father“. A PAN squats to converse with a Kond, if the latter is standing: or the Kond sits on a verandah, while the PAN must squat in the street. The PANS live in their own ghettos. Their houses are smaller and meaner than most of the houses of the clean castes, and in the old street which adjoins Baderi hamlet the houses are crammed close together. The PANS may not use the village wells or bathing place, because they would bring pollution. Every aspect of their lives reveals the PANS in a position of ritual and social inferiority" (Bailey 1960: 134).

However, this social order in Kandhamal was transformed by the activities of British Administration, Christian missionaries and Hindutva groups. The British Administration employed Panas to clear forests and roads, construct buildings and railway works and work in paper industries, and paid them higher wages and on the other hand, introduced new land relations that deprived the Kandhas of their traditional rights over the forest land. It is partly due to this British policy and partly due to their commitment to their own culture, that the Kandhas have a history of vociferous resistance to religious conversion by evangelists. On the other hand, over the years, a majority of Pana have embraced Christianity. Consequently, Kandhas started hating Panas who were close to Christianity and blamed them as traitor to their old religion and society. It is because of their conversion to Christianity and interaction with the market



economy following British rule, in post-independence period, they got government jobs and become money lenders with surplus money earned from jobs and business, whereas Kandhas decided to stay away from interaction with the British Administration over most part of 19th century (Mohapatra and Bhattacharya 1996). A few Panas took advantage of money lending and got the Kandha lands mortgaged and thus Kandhas lost their land to them. Some Pana petty bourgeoisie started to cheat Kandhas in several ways. Some notorious Pana started to steal goats, hens, and cows of Kandhas. Sometimes, they did not pay the price of Kandula Dal which they were selling for Kandhas. These kinds of incidents also did annoy Kandhas (Kumar 2008). "The Khond purchases the Meriah victims. Unless brought with a price, they were not deemed acceptable to the Goddess earth (TaruPenu). Victims from their own tribe were not procurable. The agents, mainly Panas...sometime purchased but more frequently kidnapped the children (from outside plain) whom they sold to Khonds. They occasionally (even) sold their (Khonds) own offspring without any hesitation" (Swaro 1990). The Kandhas felt that the Panas who were their dependents at one time, were land owners, and thus for the Kandhas, the Panas became exploiters and land snatchers (Kanungo 2008).

The absence of reservation for Christian Panas under current Indian constitutional provisions, along with their attempts to secure fake tribal certificates—as noted in the Mohapatra Committee Report—highlights that they require reservation benefits similar to Hindu Panas. The importance of a caste certificate to them is reflected in their conversion experience; in fact, due to the inability to obtain caste certificates, some Hindu Panas individuals in Kandhamal have converted to Christianity. Let us examine two conversion narratives from Kandhamal driven by the inability to secure these certificates.

SanjeevDigal, the former NayebSarpanch of Barakhamba Village of Kandhamal district, was denied a Scheduled Caste certificate in the past, which caused his conversion along with his family members. He changed his religion in the year 1993 at the age of 17. At that time, there were both Hindus and Christians in his village. In his view, the behaviour of Christian people was very good in comparison to Hindu. Since there was no problem between Hindu-Christian people at that time, he used to go to both Hindu and Christian ritual celebrations. However, his regular visits to Christian celebrations in his village created suspicions in the mind of Hindus about his religious identity, and this

could be the reason he did not get a caste certificate. While Hindus understood from the behaviour of Sanjeev that he had converted to Christianity, Sanjeev himself did not think he was a Christian because according to him, he had not been baptized. But from Hindus' perspective, he was a Christian since he had been continuously attending church and Christian functions. This sort of misunderstanding finally led to denial of SC certificate to Sanjeev. Denial of caste certificate in effect denied Sanjeev's 'self-identity' as he perceived it. He says:

*"I admit the fact that though I have become Christian on my own yet it is not my choice. I forced myself to convert. However, gradually I realized that Christianatmosphere is very much conducive for leading a good life since it is based on love, service and justice. Right now, I am proud to be a Christian".*

TrinathDigal from the same district had a similar kind of problem like Sanjeev. TrinathDigal had converted himself after the 2008 riots. Before his conversion to Christianity, he had a good relationship with Christianity, sometimes, going to church also. The reason for his going to church was his faith in Christianity. His closeness with the church increased with the help of a pastor when he was ill. At the time of 2008 riots, he ran into the jungle out of fear, but when he came back, he found his house undamaged. A little later, when he applied for the Scheduled Caste certificate, he was asked by Revenue Inspector to bring signatures from Hindus testifying that he was Hindu. Some agreed, but many refused because of his perceived links with Christianity. When he went to Revenue Inspector with these signatures, he was told he did not have sufficient signatures to be issued the caste certificate. He was advised instead to issue a Christian residence certificate from Tahasil office. Since he is an uneducated and poor person, in such a situation, he had no alternative than to convert to Christianity. Now, can we say this is a simple instance of exercising freedom of choice? To quote him

*"Since, my Hindu brothers were considering me Christian; I had no other alternative except to become Christian by issuing Christian residence certificate"*

In both the cases, the denial of a caste certificate effectively forced Hindu Dalit conversion to Christianity; it was not a matter of personal choice or a heartfelt spiritual appeal. It appears that had they received the certificate, they would not have converted. Interestingly, their post-conversion realization as a Christian suggests that a caste



certificate is insufficient to bind a potential Hindu convert to their original faith.

The Kandha-Pana conflict over 'caste-certificate' issue in Kandhamalor the conversion of Hindu Panas to Christianity due to non-availing of caste certificate may be traced back to the Constitution (Scheduled Castes) Order, 1950 which stipulated that only Dalits professing the Hindu religion (later amended to include Sikhs and Buddhists) could be classified as Scheduled Castes (SC). While Dalit Christians and Dalit Muslims existed, contemporary discourse often omitted discussions of caste within these faiths, asserting that such hierarchies were unique to Hinduism.

Ambedkar himself was more than aware that caste operates among Christian and Muslim communities in India. Dalit Christian employees from Southern Railways met him in Madras in his several visits prior to the operation of the Assembly and brought to his attention the issues of caste discrimination faced by them. So also Nehru was aware of caste based discrimination among Christians. Yet, it is very surprising that these stalwarts did not bother to debate at least on this issue of reservation for Dalit Christians and Muslims in the Assembly. It is a different matter that representatives from religious minorities agreed with S P Mukherjee to do away the British policy of reservation for Muslims and Christians and did not bother to even talk about reservation policy for their Dalit members. There was no discussion of caste among Christians and Muslims, unlike the other religious minority of Sikh community whose representatives vigorously forced the issue of recognition of the caste question outside Hindu fold and demanded for reservation policy for a few major Dalit communities among Sikhs. (Patnaik, 2016) Once the Presidential Order was issued in 1950, Sikh Dalits demanded to include 'all Sikh Dalits' which was obliged in amending the Order in 1956. On the contrary, K M Munshi's proposal to drop caste from the report on minorities in the Constituent Assembly was unanimously accepted in the Assembly, without any debate whatsoever. No body – Ambedkar, Nehru and others – did talk about caste among Muslims and Christians in the Assembly, except the lone voice of Wilson who raised the reservation for Dalit Christians in education sector on the concluding day of the Assembly while adopting the Draft. (ibid.)

Patnaik (2016) mentions in his article that early Indian secular leaders, specifically B.R. Ambedkar and Jawaharlal Nehru, were aware of caste discrimination among non-Hindus but prioritized reform within the Hindu community and

failed to address casteism in minority communities. This silence is framed as the origin of a crisis in Indian secularism, where religious minorities were perceived as homogenous and free from caste, resulting in the sacrifice of equal opportunities for Dalits who converted to religions other than Sikhism. Since 1986, Dalit Christians and Muslims have expressed disenchantment with this constitutional position, feeling alienated from the principle of secularism. In response to this, and due to a lack of alternatives against the Hindu right, these communities have petitioned the Supreme Court since 2004–2005 to strike down Paragraph 3 of the Constitution (Scheduled Castes) Order, 1950. They argue that this paragraph, which limits Scheduled Caste status to Hindus, Sikhs, and Buddhists, is discriminatory and violates fundamental rights guaranteed under Articles 14, 15(4), and 16(4) of the Indian Constitution, as it introduces a religious basis for reservation in a secular state.

The Modi government is opposed to 'providing reservations for Dalit Christians and Muslims'. Its Minister for Social Justice is on record stating that the government opposes this demand, citing concerns that it might encourage mass religious conversions. However, the BJP's overall position on this issue is contradictory. First, the party erroneously denies the existence of caste among Muslims and Christians, a claim that is factually incorrect. Second, it confuses the demand for caste-based reservations within these religions with the colonial-era policy of reservations based on religious identity. Third, the government claims that extending these benefits would lead to large-scale conversions from Hinduism, falsely assuming that such conversions have not occurred in the absence of such a policy. On the contrary, by not recognizing caste among Muslims and Christians and by failing to initiate reforms within them, the Indian Constitution and subsequent laws have created the impression that these religions are egalitarian enough to manage their own affairs, prompting victims of caste to migrate to them. Potential converts and victims of caste discrimination are led to believe that caste-free practices are followed by non-Indic minorities—a misconception historically reinforced by the Indian Constitution and currently by the BJP's incoherent policy.

The dithering UPA government, scared of the Hindu right, did not even debate the report by the Ranganath Misra Commission, which recommended reservation for all Dalits across religious groups by deleting the controversial Paragraph 3 of the Presidential Order of 1950 and



making Scheduled Caste status religion-neutral, similar to Scheduled Tribes. By simply tabling the report in the Lok Sabha on the last day of the 2009 winter session, the UPA government seemingly thought it had discharged its secular responsibilities, failing to gather the courage to debate the report in subsequent sessions up to 2014. The constitutional silence that began in 1950 continues despite protests by Dalit Christians and Muslims seeking to rectify this. Consequently, subaltern groups are left to fight their battle in the Supreme Court to remove the unconstitutional provisions of the said Paragraph 3 of the Presidential Order of 1950. While political theorists justify constitutional secularism in the face of the Hindu right's assault, they fail to recognize that it cannot be justified in the face of protests by Dalit Christians and Muslims.

Dalit scholars among Christians and Muslims argue that there is caste discrimination among Christians and Muslims and they demand for equality of opportunities in education, jobs and political representation. While the Presidential Order denies reservation, the Constitution under Art. 25 (b) (2) does not even recognize that social welfare reforms are necessary for Christians and Muslims. Thus, both the Constitution and the Constitutional Order (CO) 1950/1990 reinforce each other. (ibid.) Both assume that there is no need to reform religious practices in Christianity and Islam in India. These two religions that came to India from outside are assumed as egalitarian and homogenous entities as they do not believe in caste system in theory.

As stated earlier, Christian and Muslim representatives, along with Ambedkar and Nehru, remained silent on the issue of caste within Christian and Muslim communities. Nehru, conversely, believed that Hindus should reform themselves first; for him, tackling Hindu communalism was a priority, as detailed in *The Discovery of India*. Consequently, he remained quiet regarding the need for reform within non-Hindu religions, leaving this crucial issue to the respective members of the Assembly. Despite being an agnostic, Nehru acted as though he were a representative of the Hindu community. Ambedkar's silence on this issue likely stemmed from a similar approach: prioritizing Hindu reform. However, it must be noted that Ambedkar did not maintain this stance consistently before joining the Assembly. In *Pakistan or the Partition of India* (Ambedkar, 2014), he criticized Gandhi and Nehru for their complicity with Muslim leadership, which he argued was fomenting trouble for secular democracy. He described their attitude as "Muslim

appeasement" and warned that failing to boldly criticize "Hitler-like forces" among Muslims would eventually produce similar reactionary forces among Hindus, threatening democracy. What a prophetic warning from Ambedkar? Yet, Ambedkar did not question the reform narrative of the Indian Constitution. His plea for Hindu code bills initiating reforms for women among Hindus only proves my hunches that he was a willing partner of a Nehruvian legacy which he was quite rightly very critical before. But his criticisms of Nehruvian legacy and so also his views on caste in all religions simply vanished in the portals of the Assembly and later when he became India's Law Minister in the Nehru cabinet. It is indeed very strange that Ambedkar who was a critique of minority appeasement policy of Nehru and Gandhi and is now a perpetrator of same legacy: reform Hindus first, postpone reforms of minorities indefinitely and assume that minorities are egalitarians or reform themselves on their own. These are elements of a narrative of minority appeasement. Ambedkar's inconsistency is very revealing here. Losing a debate by raising a point about non-Indic subaltern life is one thing but it is a different thing altogether to shy away from a debate about subaltern life and keep quiet in order to appease non-Indic elite interests. Ambedkar's inconsistency has compromised with his own critique of democracy as an appeasement policy. What a prophetic warning from Ambedkar! Yet, he did not question the reform narrative of the Indian Constitution. His plea for the Hindu Code Bills—initiating reforms solely for Hindu women—only validates that he became a willing partner in the Nehruvian legacy, which he had previously, and quite rightly, criticized. (Patnaik, 2014) His criticisms of this legacy, along with his views on caste across all religions, seemed to vanish within the portals of the Assembly, and later, when he became India's Law Minister. It is indeed strange that Ambedkar, a critic of the minority appeasement policy of Nehru and Gandhi, became a perpetrator of the same legacy: reforming Hindus first, while postponing reforms for minorities indefinitely, based on the assumption that minorities are inherently egalitarian or will reform themselves. Ambedkar's inconsistency has compromised his own critique of democracy as an appeasement policy.

Because caste was overlooked among non-Indic minorities, there was no perceived need to reform these religions or provide equal opportunities for non-Indic Dalit groups. This is arguably a central failure of the Indian Constitution. Dalit Christian and Muslim organizations have complicated their



own case by not directly confronting this specific reform narrative within the Constitution. By primarily challenging the Constitution (Scheduled Castes) Order as unconstitutional—rather than highlighting ongoing internal discrimination—they have struggled to combat the consistent denial of caste-based discrimination within these religious communities. Both at the time of the Constitution's drafting and 70 years into Indian politics, significant evidence exists to prove that various forms of caste segregation persist in public religious life, including in places of worship, marriage, and cemeteries, as well as in educational and social opportunities for Dalit Christians and Muslims.

The Ranganath Misra Committee argues that the Scheduled Caste category is a religion-neutral group; however, the Constitution of India is silent on the existence of Scheduled Castes within all religions. It is indeed strange that the Committee finds no fault with the Constitution despite non-Indic minorities having been excluded from its reformative welfare perspective since 1950. Even stranger, however, is that non-Indic Dalit groups and secular political theorists—who are usually quick to identify flaws in the Constitution (Scheduled Castes) Order of 1950—raise no objection to the Constitution's overall reform narrative. Therefore, a revision of this narrative is essential to move beyond the current impasse in Indian secularism.

#### Reference:

- [1]. Ambedkar, B. R. (2014): "Pakistan or the Partition of India" (1946), in Writings and Speeches, Vol.8, Ministry of Social Justice and Empowerment, Government of India (New Delhi: Dr. Ambedkar Foundation).
- [2]. Bailey, F.G. (1960), *Tribe, Caste, Nation*, Bombay: Oxford University Press.
- [3]. Kanungo, Pralay (2008), "Hindutva's fury against Christians in Orissa", *Economic and Political Weekly*, 43 (37): 16-19.
- [4]. Kumar, Lenin (2008), *Kandhamalre Dharma Naanre Raktara Nadi*, Bhubaneswar: Nisan.
- [5]. Lingaraj (2008), "Kandhamal: Sampradayika-Jatikanannian- EkaBislesana", *Samadrusti*, 1(15): 35-37.
- [6]. Mahapatra, Bishnu and D. Bhattacharya (1996), "Tibal-Dalit Conflict: Electoral Politics in Phulbani", *Economic and Political Weekly*, 31 (2/3): 160-164.
- [7]. Mohanty, N.R. (2008), "Kandhamal: Issues and Challenges", *Seminar*, 591: 61-65.
- [8]. Mohanty, Sarat Chandra (2008), "Adivasi", *SCST RTI*, 48 (1).
- [9]. Pathy, Jaganath (1976), "Political Economy of Kandhamal", *Men in India*, 56(1): 1-36.
- [10]. Pathy, Jaganath (1995), "Colonial Ethnography of the Kondha: „White men“'s Burden“ or Political Expediency?“, *Economic and Political Weekly*, 30 (4): 220-228.
- [11]. Patnaik, Arun K. (2016) "A Critique of Constitutional Secularism in India", *Journal of Polity and Society*, Vol. 8, Nos. 1-2, 2016.
- [12]. Roul, Kamalakanta (2014), *Kandhamal Violence and The State: A Study of Politics of Ethnicity, Caste, Class and Politics*, PhD Thesis, New Delh: Delhi University
- [13]. Swaro, Dasarathi (1990), *The Christian Missinaries in Orissa: Their impact on Nineteenth Century Society*, Calcutta: PunthiPustaka.
- [14]. Thiady, S. (1965), *Phulbani the Khond Land*, Berhampur: Arun Press.