

Grassroots Mobilization of ‘Citizenship Right’ of the *Bihari* Minority in Bangladesh: Opportunities, Constraints and Collaboration

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Abstract

The Bihari minority in Bangladesh has consistently demanded the substantive ‘right to citizenship’, which has been steadfastly rejected because of long-standing political and historical disputes over Bangladesh’s independence. As a result, the community’s continued marginalization and denial of basic requirements has reached a breaking point, necessitating a major intervention to guarantee them a legitimate right to citizenship in Bangladesh. In response to this, a group led by the young people in this Urdu-speaking community has attempted to prove their citizenship claim through legal mobilization, demonstrating a bottom-up approach to the realization of human rights, even though workable answers to this issue are yet to be found. Hence, this essay aims to investigate the process of grassroots legal mobilization experience of this particular group, paying specific attention to their legal and political aspirations, obstacles encountered, and future prospects for these efforts.

Introduction

Amongst the displaced people around the world, 3 million Urdu-speaking Community of Bangladesh, commonly identified as ‘*Biharis*/Urdu-speakers/Stranded Pakistanis’, are the vulnerable minority group since they started living in Bangladesh (Macdonald, 2021). For decades, majority of *Bihari* minority has been in stretched situation that continuously keeps them away to lead normal life in their home country. Gradual transformation of this community as ‘stranded’ and their nexus to Pakistan relates back to the historical context of the independence of India/Pakistan in 1947. Historically, Indian subcontinent was divided on religion and communal violence exploded among the communities of different religions and ethnic origins (Muquim, 2017: 17). Consequently, nearly one million Urdu-speaking, non-Bengali Muslims; originally lived in Indian State of Bihar adjacent to Bengal; migrated to erstwhile East Pakistan during 1947 (Haider, 2018: 29). They considered East Pakistan as their permanent residence, and continued until the blood-shed state separation of East/West Pakistan and the independence of Bangladesh (Paulsen, 2006: 59). Since the independence, they have been living in Bangladesh primarily in the camps, known as ‘Geneva camps/settlements’ established jointly by ICRC¹ and UNHCR², to keep them separate following the registration of their repatriation to Pakistan (Muquim, 2017: 21). And this also contributed to their being ‘stranded Pakistanis’.

Most of the slum-like settlements are in Dhaka, capital of Bangladesh, identified with severe overcrowding, poor basic facilities, and sub-standard living conditions. Though the Ministry of Food and Disaster Management is responsible to maintain the camps, limited services are provided compared to the amenities undertaken by the residents themselves, the assistance received from UNHCR and other international organizations (Kelley, 2010: 369). They are completely being deprived for ages from basic/fundamental human rights due to their ambiguous status as ‘citizen’ in Bangladesh, as citizenship implies “a direct legal relationship between the individual and the State” (Amawi, 2000: 159) which entitles one to claim and exercise his/her legal entitlements. Therefore, this historical discrimination and deprivation has urged them to raise their voice and grassroots mobilization attempts are seen thereby,

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¹ International Committee of the Red Cross.

² United Nations High Commissioner for Refugees.

especially by a youth-led lobby group, to ensure their ‘right to citizenship’ in Bangladesh. With continuous and concerted mobilizing efforts they got normative ‘citizenship right’ in 2015, however, their legal mobilization journey still continues due to the lack of justiciability/implementation which has turned this right into a mere ‘paper right’. Bangladesh government is yet to make concerned policies to let them enjoy their citizenship right at its full (Muquim, 2017: 2). Hence, this is the primary research context which this write-up takes into consideration.

In particular, this paper attempts to focus on this ongoing socio-legal injustice/right struggle of the *Bihari* minority and their bottom-up legal mobilizing efforts thereto considering secondary data of scholarly journal articles, newspaper articles, case decisions, international reports, and following the research question- to what extent does the Urdu-speaking/*Bihari* Community in Bangladesh enjoy ‘citizenship right’ and how has been the grass-root mobilization of this community making the path from ‘strangers to citizen’ till today?

In so doing, the paper first introduces the key actor of this legal mobilization and their identification on the rights violated and several root-causes related thereto. This briefly follows their legal mobilization journey with special reference to the approaches/legal-political opportunities they invoked, practices attempted, constraints faced and further collaboration with other national/international actors, focusing the potential of their mobilizing struggles, and finally concludes with some key findings.

Primary Actor of This Right Mobilization and Their Deterrence of *Bihari* Community Rights Infringed

Civil society organizations have potential to contribute to re-describe national/international laws and, by explicitly engaging in the political and legal implications of their actions, promote social justice (Handmaker and Arts, 2018: 13). Following this a civic grouping, Association for the Young Generation of Urdu-Speaking Community (AYGUSC) of 11 young camp residents, has grown within the *Bihari* community itself during the beginning of 1990s. Members of this youth-led lobby group, the key actor, resort to legal mobilization to regularize *Bihari* status in Bangladesh. By 2000s, nearly 80% of young Urdu-speakers who was born in the camps came with the promise of political liberalization (Sholder, 2011: 6) identifying themselves as Bangladeshi and considering rehabilitation through Bangladeshi citizenship and integration into mainstream society as the most doable future (Urbanksy, 2009). Moreover, gross marginalization and discrimination towards their own community for ages have insisted them to argue and claim, representing the *Bihari* community, for ‘citizenship right’ and protection of basic human rights that the camp residents legally deserve in Bangladesh also regretting the older generation’s contribution to their community’s marginalization claiming for only repatriation to Pakistan (Kelley, 2010: 360). Furthermore, Like *Roma* and Women minority/interest groups at the European level (Jacquot and Vitale, 2014: 593), another hypothesis accounts for their attempting legal mobilization is the gradual development of their litigation capacities over time (Kelley, 2006: 370) which has been explained in the subsequent segment.

This ‘interest group’ finds that the negation of ‘citizenship right’ has encountered the camp inhabitants with disavowal of other fundamental constitutional rights, such as, legal identity/passport, right to vote³, right to employment⁴, right to education in own language or any other affirmative action programmes. Moreover, Urdu-speakers cannot lodge complaints/appeals to the City Corporation or any regulatory watchdogs to claim their underprivileged services. Even political demonstration and any sort of ad hoc, ‘rude’ forms of accountability (Hossain, 2009) are limited for their unwarranted situation and resentment from the majority Bangladeshi society.

³ Article 122, The Constitution of the People’s Republic of Bangladesh, 1972.

⁴ Article 29 and 40, *ibid*.

Concerned to the basic human rights, the settlement/camp condition is dilapidated and utterly dismal. Since camp populaces are entirely reliant on Bangladesh government and charity from other organizations to meet their basic needs, they are being denied 'right to adequate standards of living'⁵ (Abrar and Redclift, 2007). For instance, the perimeters of the camps are fixed, therefore, ten to twelve family members live in tiny places without any privacy, with poor sanitation, improper drainage, garbage disposal system, polluted water and deteriorated 'health right'⁶ issues (Paulsen, 2006: 55; Namati, n.d.-a). Adding to their grim living conditions, they are engulfed to poverty and insufficient nutritional intake.

Bihari children have hardly access to 'right to education'⁷ as camp address is a virtual bar to the entrance to the government-funded schools and careers in the formal sectors (Ahsan and Hussain, 1990: 289). Having limited afford for private schools, approximately 10% of primary-aged and 2% of secondary-aged children only attend the school, thus, their livelihood is concentrated in low-paid jobs, relegated to informal sectors (Nahar, 2000: 180). Hence, social problems associated with unemployment/poverty like gangs, drugs, child labor and child marriage have become the signature marks of these camps (Lynch and Cook, 2006; Mantoo, 2013: 129).

Accountable Factors for Rights Violation and Social Exclusions Examined by the 'Interest Group' Advocating *Bihari* Rights

While advocating *Bihari* rights, this 'community group' encountered the following root causes causing the refusal of 'right to citizenship', social exclusion and other injustices towards this Urdu-speaking community:

Firstly, diplomatic impasse between Bangladesh and Pakistan has sealed the possibility of either repatriation to Pakistan or citizenship in Bangladesh. After the independence of Bangladesh, many *Biharis* opted for repatriation but Pakistani government was hesitant to receive them, as about 120,000 were repatriated only (Sholder, 2011: 5). For this, Bangladesh government considers camp residents as 'stranded Pakistanis' rather than Bangladeshi citizens and still there is no constructive discussion between two countries concerning *Bihari* issues. Therefore, this diplomatic deadlock has turned them into the elongated standing de facto 'stateless' people in the world and victimized them depriving 'citizenship right'. This becomes an 'injustice' when Bangladesh refuses/denies 'citizenship' to the young generations who born here after she got independence (Malik, 2000: 19).

Secondly, State Bureaucracy and structural bias are also responsible in depriving *Biharis* from their basic rights. Considering Bengalis as 'self' and *Biharis* as 'other', an inherent propensity remains among the public officials to confer extra-advantage to the Bengalis through institutional patterns and practices. Bureaucrats promote policies those maximize Bengali power, pay, and accommodate some groups to regulate their inclusion in the regulated industry. *Biharis* of Bangladesh are undoubtedly one such group who has been experiencing exclusionary powers of State actors that makes them vulnerable to their rights (Chatterji, 2012: 1070). Lack of standard parameters and awareness are seen in bureaucracy during handling '*Bihari*' issues, especially, while providing community members their necessary entitlements (Muquim, 2017: 2). Furthermore, having bias, public officials often arbitrarily decide that being *Bihari*, he/she is not entitled to the services (Paulsen, 2006: 56) based on their settlements addresses.

Thirdly, age-long misrepresentation and marginalization have marked 'social stigma' on *Biharis* that also triggering to their 'social exclusion'. They face systematic informal discrimination while

⁵ Article 15, *ibid.*

⁶ Article 18, *ibid.*

⁷ Article 17, *ibid.*

interacting with mainstream society for bearing camp addresses (Chhotray and McConnell, 2018: 114), which instantly marks out them while ethnically indistinguishable. For instance, *Biharis* attending government schools outside the camps have an increased rate of dropping out because of the harassment both by the teachers and apprentices. However, those have another address beyond the camp, are only capable to access proper employment and education facilities in the university (Sholder, 2011: 19). Ironically, the existing social stigma makes it hard to find landlords who will rent *Biharis* outside the camp, even having affordability (Abrar and Redclift, 2007). Moreover, societal tendency to humiliate them by labelling ‘refugee’ still prevails, when UNHCR does not recognize them as refugees anymore (UNHCR, 2015: 1-2).

Finally, memories of blood-stained national birth (Roy, 2018: 1) and non-alliance of *Biharis* in Bangladesh liberation war, nurtures her deep-seated remnants of anger against the very community (Farzana, 2009: 231) which has been identified by the ‘lobby group’ as an underlying reason for their deprivation of ‘citizenship right’.

Nature, Extent and Constraint of The Legal Mobilization Approaches Adopted by The Civic Group

People living in the camp provided the main impetus for this right mobilization, therefore, the youth-led community group has started promoting ‘citizenship right’ considering legal mobilization as their legitimate legal-political claim to protect fundamental human rights (Handmaker, 2022b: 9) and to resist or counteract exercise of power against the historical injustices and discriminations against the *Biharis*, with a focus on the socio-legal context (Handmaker, 2022a).

Adopting Legal-Political Opportunity Structures as ‘Mobilizing Approach’

As legal mobilization approach, the ‘interest group’ has leveraged ‘legal-political opportunity structures’ (ibid) in supporting their claim. However, to what extent/ways these have been applied can be extracted from the following analysis:

Taking Advantage from Political Opportunity Structure

Political opportunity structure symbolizes the level to which a system is open to be influenced from ‘social movements’ and other ‘extra-institutional’ groups. If the existing political system is vulnerable to a challenge, it creates opportunity for others, such as, the movement members, to use this opportunity “time to push through a social change” (Meyer, 2004: 126) and this vulnerability can be caused by increased political pluralism, decline in repression etc.

While mobilizing *Bihari* rights, the collaborating external support of parallel social movements, national/international institutions (elaborated later), political networks were contributory to the young activists’ access to technical and legal support which also included the pro bono representation of a *Bihari* lawyer. Without these, it was implausible for the lobby group to read and invoke the politico-legal climate to strategically determine the efficacy of legal strategy, as we know legal opportunity also derives from political opportunity structure. This becomes obvious when Advocate M.I. Farooqui commented, lawyer of their first petition, “in deciding to take legal action we had not only read the law; we read the judges” (Southwick, 2011: 131), meaning taking advantage from the existing institutional political vibe.

Most significantly, in 2007, this community group took another political prospect to advance their citizenship claim through the engagements of the ‘caretaker government’⁸, as an instance of ‘political pluralism’, which challenged the existing adverse political system disfavoring their ‘citizenship’ right.

⁸ An interim non-party government operating, after the completion of 5 years regular tenure of elected government, until the new parliament comes into session with newly elected democratic government.

This military-civil caretaker government, though considered as political crisis for the absence of elected government, was full of potentials for comprehensive regime-change, what this group availed, and finally Election Commission was designated to bring reforms which included formal registration of *Biharis* also (O'Neil et al., 2015: 13). Observing the positive consequences it occasioned for camp inhabitants, Michael Trebilcock⁹ is quoted as accepting that "a political crisis can also be a catalyst/opportunity for a policy shift like happened for *Bihari* minority" (O'Neil et al., 2015).

Furthermore, the lobby group appointed Rafiqul Islam Miah as lawyer in their second petition in 2008, who was politically well connected and candidate of the 2008 general election for 'Dhaka 16' constituency, where this *Bihari* camp/settlement situates. Therefore, he technically included the *Bihari* citizenship issue into his party election agenda (*Bdnews24*, 2008). Realizing the worth of Urdu-speakers' votes, opponent party also got provoked and backed this legal mobilization promising the community rehabilitation in Bangladesh and distributed pamphlet even in 'Urdu' for the first time (O'Neil et al., 2015: 14). Thus, this young civic group leveraged political opportunities; from political institution, political parties' even political personnel's ends; to advance their 'citizenship right' claim.

Applying Legal Opportunity Structure

Social Movements very often recognize that there are moments when legal avenues can be very productive to mobilize legal rights, coining this as 'legal opportunity'. Comparing to political opportunity structure, this implies the more formal one, using legal stock, tools and legal institutions only, to influence and enforce public policies across wide range of human rights issues (Vanhala, 2018: 381) and with both success and failure it can influence legal mobilization dynamics (Vanhala, 2018:407). Therefore, the very 'interest group' has also exercised legal opportunities through strategic litigation in the Supreme Court of Bangladesh claiming the already available legal stocks and norms as their legal stand.

Firstly, the Citizenship (Temporary Provisions) Order, 1972 and the Citizenship Act, 1951 in Bangladesh have not defined 'citizenship' in terms of 'ethnicity' rather assured either by birth¹⁰ or descent¹¹ (Paulsen, 2006: 58) also recognizing those who were born before independence but their forefathers' were permanent resident here (Haider, 2018: 30). The community group took this national legislative advantage supporting their claim, as they were born in Bangladesh and their ancestors were also born and permanent residents in this land even prior to Bangladesh's independence in 1971. Moreover, as Bangladesh Constitution pledges equality¹² and non-discrimination¹³ towards every citizen regardless of religion, race, caste, sex or birth-place (Paulsen, 2006: 59), they claimed this legal opportunity to ensure their basic rights without any discriminatory approach.

Secondly, they also applied legal stock of authoritative precedents from the landmark Appellate Division case *Bangladesh v. Professor Golam Azam*¹⁴ which reaffirms, "neither the Constitution nor any concerned laws, define Bangladesh citizenship in exclusionary way on ethnicity, instead, ensure full fundamental, civil and political rights to every citizen" (ibid: 57). The youth-led group further took shield of *Mukhtar Ahmed* case¹⁵ decision; "mere filing of application for the citizenship of another

⁹ Michael J. Trebilcock is a New Zealand-born, Canadian-based law academic. He is currently professor of law at the University of Toronto.

¹⁰ Section 4, Citizenship Act, 1951.

¹¹ Section 5, ibid and Article 2, Citizenship Order, 1972.

¹² Article 27 of the Constitution of the People's Republic of Bangladesh.

¹³ Article 28, ibid.

¹⁴ (1994) 46 DLR (AD) 192.

¹⁵ *Mukhtar Ahmed v. Government of Bangladesh* (1982) 34 DLR 29.

country or application for “repatriation” to Pakistan did not affect one’s Bangladeshi citizenship status” (Haider, 2018: 32-33); to defend their previous generation’s stake and to strengthen their claim for ‘right to citizenship’.

Thirdly, they urged legal opportunity of equal citizenship right from international laws also as *Anika Ali v Rezwanul Ahsan*¹⁶ held that “Bangladesh Courts can take into consideration the principles enshrined in the Bill of Rights¹⁷” (Muquim, 2017: 135).

Following aforementioned ways, the civic interest group has tried to leverage legal-political opportunity structures to support *Bihari* minority and the resolution finally turned out in the Courts (Kelley, 2010: 360).

Combining Legal and Non-Legal Strategies as ‘Legal Mobilization Practice’

The ‘interest group’ started rights mobilizing through ‘non-legal’ strategies like seminars and conferences with legal activists, academic and scholars of Bangladesh Refugee and Migratory Movements Research Unit. This associated them with broader networks of Bengali intellectuals and lawyers and helped to deter ‘social prejudice/stereotyping’ towards them through exchanging their views. They also collaborated the Council of Minorities’ ‘paralegal’ programmes to help camp residents in obtaining legal documents, birth certificates; enabling systematic data collection on the *Bihari* experience of state services and administrative processes; which is crucial for policy-influencing and taking further legal action (Namati, n.d.-b). Eventually, the community group with aforementioned associates recognized ‘citizenship’ as necessary condition for their rehabilitation. Therefore, they have been spotted to do peaceful ‘protests’ urging the government to recognize them by enlisting as voters, which was the entry point to progress their citizenship claim. Due to the government’s denial, the group invoked strategic litigation before the Supreme Court in 2003. As the ‘practice’ of legal mobilization, they filed litigation in combination to their ‘protests’, since legal mobilization is tied with litigation, also to reinforce each other. Moreover, it helped court mobilization as these social justice movements were not for the elites rather coupling with deprived communities. (Handmaker, 2022a).

In *Abid Khan v. Government of Bangladesh*¹⁸, the young group urged the Court to direct Election Commission to register the ‘petitioners’ as voters as they were legally major and born in Bangladesh either before or after independence (Haider, 2018: 32). Court ruled in favor of them asking the Commission to move into Court’s direction and established legal precedent indicating the efficacy of class action which proved critical in next petition (Kelley, 2010: 363). However, the process postponed till next election which led another petition¹⁹ in 2008 requesting the Court to direct Election Commission to enroll ‘all the *Biharis*’ as voters with camp addresses (Southwick, 2011: 134) and issue national identity card (Kelley, 2010: 364). This petition was potential platform facilitating their overall integration into Bangladeshi society. After four years, for structural biases of the Court, a partial decision came favoring the community except those who wished to be repatriated to Pakistan. In 2013 the group appealed and finally in 2015 Supreme Court declares all the residents

¹⁶ (2012), 17 MLR (AD).

¹⁷ Universal Declaration of Human Rights, 1948 (UDHR) and its covenants, including the International Covenant on Civil and Political Rights, 1966 (ICCPR) and International Covenant on Economic, Social and Cultural Rights, 1966 (ICESCR).

¹⁸ (2003) 55 DLR 318.

¹⁹ *Md. Sadaqat Khan (Fakku) and others v Chief Election Commissioner, Bangladesh*, Writ Petition No. 10129 of 2007.

are 'citizens' of Bangladesh, accordingly, eligible, and entitled to be enrolled as voters. Thus, camp residents were given national identity cards, but without any access to have Bangladeshi passport (Muquim, 2017: 27).

Additionally, the bureaucracy's responsibility to protect *Biharis* from systemic neglect is still an issue. Despite 2015 judgment, no execution occurs at its full and continuous denial of civil and socio-economic rights exist. Bangladesh government cultivates pious promises of equal citizenship rights, safeguarding international reputation, but violates implementing obligations which turn this minority into "diminished citizen" (Amawi, 2000: 159), an 'artificial minority' (Haider, 2018: 26). Therefore the 'civic group' is still fighting resorting 'non-legal' attempts, collaborating other NGOs, alongside the legal platform to create national/international pressure to implement rights.

In-sum, interest group's such concerted legal mobilization, combining both legal and non-legal strategies, has been challenging mainstream policies and approaches on political, social, legal and moral grounds aiming to shift society's dominant values and power to truly establish their 'citizenship right', just as seen in post-apartheid South Africa (Ballard et al., 2005: 631).

Existing Constraints in Mobilizing *Bihari* Rights

The 'lobby group' has been encountering several constraints in their legal mobilization journey which also corresponds to the root causes of their rights violation and social exclusion mentioned in segment 3. For instance, lack of necessary structural/institutional support (Handmaker, 2022c: 13), due to structural biases (Handmaker, 2022a) of the Court, State bureaucracy and public officials, respectively, through delayed judgments without any execution monitoring, non-compliance to Court's decision in promulgating/implementing policies supporting *Bihari* rights, discriminatory stand of public officials in co-operating even with logical issues etc. Also, the legal costs (Vanhala, 2018: 384) in conducting cases for almost 12 years were another constraints to them.

Moreover, over-generalization of 'hatred discourse' towards the camp residents based on disloyalty/disaffection during Bangladesh liberation war (Paulsen, 2006: 57), creates unexpected hurdles in their journey, in worst cases, leading sporadic instances of hostilities towards their legal/peaceful attempts by Bengalis living adjacent to the camps. Last but not the least, ensuring their own 'inclusivity' and 'collective action' in legal mobilization challenges this group as there is false deterrence within the residents that struggling for rights can cause their eviction from the camps by the government (Urbanksy, 2009).

Collaboration with Different Actors Evaluating the Mobilizing Effort's Future Potential

The youth-led group has been mobilizing their claim of 'citizenship right' collaborating with legal and human-rights advocates, academics and national/private/international institutions. Their interaction with National institutions, notably the Supreme Court, played a key role in the determination of citizenship problem but was not the single catalyst of change. Influence of international institutions like UNHCR and the UN Resident Coordinator was also a contributing factor (Kelley, 2010: 370) as their diplomatic missions constantly placed the resolution of the citizenship issue before the government which added renewed vigor to the caretaker government.

The group is further collaborating with private actors (NGOs) campaigning for the rights of Urdu-speaking Community in Bangladesh²⁰ to implement their equal/non-discriminated rights in every

²⁰ Such as AFB, OBAT Helpers, Concern Worldwide Bangladesh, Muslim Welfare Development Organization, and Bangladesh *Nari Mukti Kendra*

sphere with the authority of right to citizenship (Muquim, 2017: 78). Responding to the persistent disavowal of functional citizenship, the very group concerted with Council of Minorities conduct legal and advocacy programmes for camp residents.

They are continuing their mobilizing mission with the assistance of International institutions also. The group represented through UNHCR in several conferences held in the Netherlands, Thailand, and Malaysia over the past few years to spread awareness about the community's citizenship status in Bangladesh (Muquim, 2017: 81). Recently, UNDP²¹ and UNICEF²² have also pursued ways to include the Urdu-speaking minority in their programs, and the UN Resident Coordinator has been a strong advocate on their behalf. They are collectively advocating to ensure dedicated action from Bangladesh government, donor support, and efforts of the *Bihari* community itself, so that equal entitlement to basic rights can be implemented in practice (Southwick and Calabia, 2008)

Notably, aforementioned legal, non-legal and paralegal initiatives of this 'lobby group' have serious potential/broader goals while mobilizing specific 'right to citizenship' for the community, which also attract other national/international institutions to support them. Their success in 'legal initiative' has already provided the community new instruments to challenge/improve their position increasing their legal capacity to revert to the Courts, for instance, at present a writ petition is pending claiming stay order against government eviction of several camp lands in Dhaka (Muquim, 2017: 163). Moreover, it opens doors of new forms of mobilization within the camps including community legal services to make the inhabitants conscious about their rights and help them steer administrative and legal processes. Other 'non-legal activities' concerted with different NGOs have potential to mentor a new generation of legal activists and new forms of class action on behalf of Urdu-speakers like the recent right to information claim; to increase domestic civic and middleclass attention including international funders towards the community's poverty, exclusion, insufficient national and international legal protection (Haider, 2018: 27). Furthermore, their 'paralegal' works have high probabilities to resolve camp resident's civil legal issues, and to give them required information to be in informed position to deal with future problems also.

Conclusion

Bihari minority in Bangladesh cannot exercise their rights as 'citizen' carrying a historical root of marginalization and deprivation (Kelley, 2010: 349). The poor living conditions including livestock living side by side with the community (Paulsen, 2006: 55), bureaucratic state structures and public service provider's denial to provide key facilities for their socio-economic mobility (Haider, 2018: 37), social prejudice towards the camp address etc. have contributed to worsen their conditions until a new generation 'interest group' challenged those assumptions. Their continuous effort of legal mobilization of 'right to citizenship', using available legal-political opportunity structures, has brought significant human rights achievement when Supreme Court legally recognized their citizenship right.

However, the expected improvement/implementation is still missing as Bangladesh has no specific mandate to provide them full national protection, and yet to establish durable solution for them as citizens. Therefore, exploring all sort of collaboration with national, international, private actors, the key actor of this legal mobilization i.e. the youth-led group, has been trying to ensure full social integration and equal treatment to the *Bihari* minority adopting various legal/non-legal/para-legal practices, for instance, raising national/international awareness for policy adoption, mobilizing own legal activists, navigating international fund etc. Respecting the high potential and noble aim of their legal mobilizing efforts, international and domestic actors/agencies should continue to support this grassroots 'civic

²¹ United Nations Development Program.

²² United Nations Children's Fund.

group' in pursuing social, political and economic advancement of *Biharis* as full citizens of Bangladesh.

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