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2 TITLE: Making the ‘man-eater’: tiger conservation as necropolitics

4 ABSTRACT: In this article I analyze the practice and politics of classifying a tiger as a ‘man-  
eater’ in South India to explore what doing so reveals more broadly about the relations  
6 between animal life and the kinds of human life marked as expendable by the state. I draw on  
Achille Mbembe’s theory of necropolitics in order to analyze how the Indian State attempts  
8 to manage human-wildlife relations in a contested plantation landscape of high priority for  
wildlife conservation. While there is a large literature theorizing wildlife and biodiversity  
10 conservation as the practice of biopolitics, I argue conservation, as both a typology of space  
and set of ideologically malleable practices, remains under-theorized as a form of  
12 necropolitics, the politics mediating death. I examine how the Indian State goes about  
reclassifying tigers from a strictly protected endangered species to killable—the process of  
14 making the ‘man-eater’—in relation to how the state both values and devalues human and  
non-human life as a process rooted in colonial histories of accumulation by dispossession.  
16 This article responds to calls across political ecology and political geography to better  
theorize the role of non-human animals as essential subjects of inquiry in political  
18 contestations. It does so through exploring the spatial contours of deadly encounter between  
plantation workers and tigers in the plantation-conservation necropolis.

20

Keywords: necropolitics; tigers; India; wildlife conservation; less-than-human geographies;  
22 political animal geography

24

26

## 1. INTRODUCTION

28

One afternoon in Gudalur, a small town in Tamil Nadu, India near the borders of Kerala and  
30 Karnataka, I received a text message and photograph from a former Tamil Nadu Forest  
Department staff member. In the photograph, there was a man. He was splayed at an angle,  
32 his head turned sideways. But where his torso ought to have been there was nothing, just  
blood-stained grass.<sup>1</sup> The accompanying message said, “Found this morning. Man-Eater.”  
34 The man was a tea plantation worker from Jharkhand, one of the poorest states in India.<sup>2</sup> The  
tiger that was thought to have done the killing was shot dead eight days later, and two police  
36 officers would be sent to the hospital with their own wounds from bullets they caught in  
crossfire. It was never conclusively proven the police killed the right tiger, however.

38

The moment of deadly encounter between species is a prism through which questions of  
40 significant debate for advancing political animal geography as a field of research become  
focused (Hobson, 2007; Srinivasan, 2016). In this article, I chart the politics and procedures  
42 through which a tiger is made killable by the Indian State to advance thinking relationally  
about how the state values the lives of certain humans against those of certain animals, and  
44 the racialised violence embedded in these calculations in a landscape with the world’s single  
largest population of wild tigers (Jhala et al., 2015). My aim is take seriously the bidirectional  
46 nature and flows of power embedded in the hyphen connecting human with animal in

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<sup>1</sup> I later learned this photograph was taken *after* the man’s body parts were found scattered throughout the area and brought back together.

<sup>2</sup> Poverty here is in reference to several gross economic indicators, including the Reserve Bank of India and Census of India statistics on the percentage of population below the poverty line, as well as household asset indicators (2011-2012).

‘human-animal relations’. When the life of a single tiger is held in the balance, what is  
48 signified in the politics determining which lives (human and animal) are secured and which  
are sacrificed at the hands of sovereign power? This leads me to ask: what can the  
50 procedures, practices, and politics surrounding the killing of a tiger and attempts to classify it  
as a ‘man-eater’<sup>3</sup> reveal about the relationships between animal life and the kinds of human  
52 life marked as expendable by the state? I approach this question through examining the  
making of the ‘man-eater’ in relation to Achille Mbembe’s theory of necropolitics (Mbembe,  
54 2003). Necropolitics contributes to understanding the deathly side of what is a more  
theoretically advanced understanding of biodiversity and wildlife conservation as biopolitics,  
56 and does so with vitally important attention to the racializing practices found at the heart of  
the capitalist colonial project (Biermann & Mansfield, 2014; Fletcher, 2010; Mbembe, 2003).

58

Necropolitics advances grappling with the position of animals as political subjects enmeshed  
60 in more-than-human contestations by directly engaging with the geographies of “who must  
die” when species meet (Collard, 2012; Mbembe, 2003: 11; Philo 2017). Animal geography  
62 has a longstanding commitment to questions of non-human politics—most persistently  
through engaging with forms of animal ethics and the politics of animal commodification  
64 (Collard, 2014; Emel & Wolch, 1998; McKnight, Wolch, & Emel, 1998; Shukin, 2009;  
Wolch & Emel, 1995). There is a robust literature on the killability of animals, especially as  
66 pertains to domestic livestock, slaughterhouses, and zoos (Animal Studies Group 2006;  
Chrulew, 2011; Chrulew, 2017; Cudworth, 2015; Gillespie, 2018; Shukin, 2009; Wadiwel  
68 2002; 2015). Especially pertinent to this article, Chris Wilbert (2006) offers a valuable  
contribution for thinking about man-eaters in relation to their colonial imaginary as

---

<sup>3</sup> The term ‘man-eater’ is employed here because it is the most common descriptor for a carnivore that eats humans (male, female, or otherwise) within the context of the study region. This term is not meant to suggest that only men are subject to tiger or leopard attacks.

70 monstrous beings with agential capacities. But as Buller (2014) reviews, more recent  
attention in animal geography has focused on animal geographies' ontological politics,  
72 revealing "interspecies contact or symbiogenesis based upon a more convivial, less fixedly  
human and more risky approach to boundaries, to political actors, and to political outcomes  
74 that inherently challenges what it means to 'belong' or to pertain'" (314). This shift towards  
animal ontological politics and 'convivial' human-animal relations has raised criticisms by  
76 scholars, especially drawing on critical race theory, feminist studies, and postcolonial studies,  
concerned with the ways the 'ontological turn' overlooks the very *human* politics of  
78 difference underpinning human-animal relations and the histories of whom or what 'counts'  
as human or animal (Emel 1995; Jackson, 2013; 2015; Kim 2015; 2017; Olson, 2017;  
80 Sundberg, 2014). I am therefore concerned quite simply about what happens when human-  
animal encounter isn't convivial, but deadly, where the geographic conditions that prefigure  
82 the moment of encounter crystalize difference enacted through race, caste, and class in  
producing *less-than-human geographies* (Laurie & Shaw, 2018; Philo, 2017). Less-than-  
84 human geographies signal a turn towards giving more attention to 'direct' acts of violent,  
visceral harm and the geopolitical environments that foreground them, rather than, as is more  
86 common in human geography to date, forms of structural, slow violence produced through  
social inequalities in the 'letting die' of surplus populations (Philo 2017; Tyner 2013, 2015).  
88 While the killability of tigers is essential to my discussion of making the man-eater and will  
be discussed later in the article, my primary concern here lies with the death of humans  
90 resulting from these more-than-human entanglements.

92 In bringing animals to the center of this discussion of violent more-than-human politics, the  
interdisciplinary field of political ecology, being broadly concerned with issues of justice in  
94 the co-production of environments and access to natural resources, has increasingly come to

engage with more-than-human geography and post-humanist theory on the one hand, and the  
96 politics of animals on the other (Collard 2014; Robbins 2011; Margulies and Bersaglio, 2018;  
Sundberg, 2014; Turner 2015). The theoretical and methodological tools and practices of  
98 political ecology are familiar to political geography, with both fields offering unique vantage  
points from which to analyze and examine politics of the environment at different scales of  
100 inquiry (Benjaminsen et al., 2017; Bigger and Neimark, 2017; Dalby, 2000; Emel, Huber, &  
Makene, 2011; Robbins, 2003, 2008; Turner 2015; Whitehead, 2008). Critical analyses of  
102 this kind demand research operating not only ‘from below’ or ‘from above’, but with critical  
attention to politics as the expression of discontent where power (from above) and resistance  
104 (from below) meet in space. I therefore situate my engagement with necropolitics through  
post-humanist political ecology as a research practice for interrogating the relations between  
106 animals and the elements of the Indian State as a political animal geography of wildlife  
conservation. My aim here is to grapple with the subject of the animal and the subject of the  
108 state apparatuses operating literally on the ground in Gudalur, as well as from a distance, in  
co-producing the problem of the man-eater as it encountered its human prey in a deeply  
110 politicized post-colonial landscape.

112 In what follows, I describe and advance my argument for understanding the incident of the  
man-eater in Gudalur as an act of necropolitics, followed by an overview of the political  
114 economy of this landscape to situate my analysis within the appropriate colonial and  
postcolonial historical context of Gudalur’s land tenure politics. I then move to a discussion  
116 of the rules and bureaucratic procedures of making a man-eater in India in order to bring  
forward how the practices and procedures of classifying a tiger as a man-eater can be  
118 understood as the bureaucratization of violent politics within the necropolitical space of the  
plantation. I end with a discussion of what this incident demonstrates in stitching together the

120 life of a single tiger with how the state legal, repressive, and bureaucratic apparatuses attempt  
to manage the process of making the man-eater. This discussion clarifies how the underlying  
122 political economy of the postcolonial plantation landscape is central both to the death of the  
tiger's victim but also the tiger itself.

124

## 126 2. CONSERVATION NECROPOLITCS

128 The work of Michel Foucault has been heavily influential in political ecology for illuminating  
how the modern state reproduces the conditions for compliance over subjects through  
130 capillary forms of discursive power, what Foucault described as governmentality, the  
'conduct of conduct' (Fletcher, 2010; Foucault 1991: 48; Legg, 2005; Rutherford, 2007).

132 Studies of contestation and conflict in and through the environment drawing on the logics of  
governmentality are more numerous than those drawing on Foucault's related work on

134 biopolitics, how the state wields power over the population (as opposed to the individual) by  
'making live' and 'letting die' (as opposed to sovereign power asserted as 'take life or let

136 live') (Foucault 1991; 2003: 239-264; 2007). Foucault's concerns here were with the  
everyday making of sovereign subjects and the increasingly intimate ways beginning in the

138 mid-18<sup>th</sup> Century in Europe through which sovereign powers sought to "penetrate society,  
exact compliance, and invoke commitment" (Sivaramakrishnan 1999:5). Biopolitics is

140 therefore about the production and maintenance of the state's population, and how in order to  
do so, the state at the level of the population asserts "individualizing and totalizing form[s] of

142 power" (Foucault, 2000: 332; Jessop 1990: 236).

144 Biopolitical theory has more recently informed the development of a better understanding of  
regulating non-human life in the context of biodiversity conservation (Biermann &  
146 Mansfield, 2014; Srinivasan 2014; Fredriksen 2016). Extending biopolitics into spaces of  
nature conservation has in turn expanded the purview of whom or what be might considered  
148 as biopolitical subjects (Biermann & Mansfield, 2014; Lorimer & Driessen, 2013; Srinivasan,  
2014). Recent interventions have focused explicitly on ‘more-than-human’ biopolitics  
150 (Cavanagh, 2014), drawing Foucault into close readings with animal and more-than-human  
geographies to consider the regulation of animal life at the level of the singular animal, the  
152 population, and entire ecosystems (Biermann, 2016; Hodgetts, 2017). But how do we  
consider the more-than-human entanglements of lives whose encounter is often a mortal one?  
154 Here biopolitics falls short of helping theorize how and why regimes of governmentality  
maintain the geographical conditions for encounter between human and non-human  
156 populations that are not mutually supportive or reliant, but ambivalent or antagonistic  
(Cavanagh 2014; Ginn, 2014; Hodgetts 2017). For this reason I am interested in the under-  
158 theorized role of the active making of death that occurs alongside biopolitics as distinct from  
the processes of ‘letting die.’

160

Necropolitics speaks to the inadequacies of biopolitics to address the violent and racialised  
162 forms of difference produced in colonial and postcolonial geographies (Mbembe 2003;  
2005). While biopolitics focuses on the *bios*—life—how the sovereign subject must be  
164 conserved for the state to go on, these practices of ‘making live’ are always in dialectical  
relation with death, but also what is made killable—or in the words of Mbembe, the  
166 “contemporary forms of subjugation of life to the power of death (necropolitics)” (2005: 39).  
This is not to say death does not figure in biopolitics, or that death has been ignored in critical  
168 studies of human-animal relations (Emel & Neo, 2010; Gillespie & Collard, 2015; Lopez &



Gillespie, 2015; Shukin, 2009). Rather, the concept of necropolitics addresses the  
170 inadequacies of biopolitics' engagement with the *active political* processes of death as  
necessary for the maintenance of other kinds of life under particular political regimes.

172

I am drawn to necropolitics for its geographic nature in understanding the power of killability  
174 (cf Singh and Dave 2015) in relation to economic spaces of productivity, and how this helps  
advance a more nuanced understanding of the work of death in studies of political ecology,  
176 what Cavanagh and Himmelfarb (2015) have called *necropolitical ecology*. Cavanagh and  
Himmelfarb (2015) highlight the inadequacies of strictly Foucaultian accountings of  
178 biopolitics that under-theorize issues of race, caste, and class within colonial and post-  
colonial contexts (Legg 2007). As they describe, "Foucault (2003:254–255) is at pains to  
180 illuminate the ways in which 'racism'—understood as a logic that separates the normative  
elements of a population from 'the inferior race (or the degenerate, or the abnormal)'—  
182 constitutes the primary means of inducing a caesura 'between what must live and what must  
die'" (Cavanagh and Himmelfarb 2015: 58). Mbembe therefore does much needed work in  
184 making biopolitics 'travel' to the postcolony, both in a geographical sense, but also in  
advancing theory more attuned to the dehumanizing practices and technologies at the heart of  
186 the colonial processes of territorialization, economic plundering, and production of the  
colonial subject. When Mbembe writes that in the context of the colony, the colonized were  
188 relegated "into a third zone between subjecthood and objecthood", he also is speaking to their  
spatial relegation from the *bios*, the population made to live through the context of the slave  
190 plantation (2003: 24). Mbembe describes how the plantation developed as a spatialized zone  
of exception for lives cast as less than human within the colonial state. Necropolitics shows  
192 how politics can be understood as "the work of death" (16)— not just the making of the *bios*-  
subject and its securitization—but in enabling a certain population to thrive, whom the state

194 targets, through what processes, under what conditions, and the spatial conditions necessary  
for acceptable extermination by sovereign power.

196

In bringing necropolitics to considerations of political animal geography, it is important to  
198 acknowledge the historical postcolonial terrain this argument advances on. Much like  
Agamben's concept of bare life (1998), Mbembe developed the theory of necropolitics to  
200 respond to what he saw as the new and disturbing ways in which colonial states developed  
zones of exception enabling horrific atrocities and acts of violence. Bare life, as described by  
202 Agamben, is the expression of humans removed from the privileged sphere of politics and the  
state, or *bios*, reduced to the *zoe*, "the simple fact of living common to all living beings  
204 (animals, men, or gods)" (Agamben, 1998:1). Being reduced to bare life strips humans of  
value, rendering humans as animal bodies, killable without a crime being committed, an act  
206 of violence occurring beyond the law. As Laura Hudson (2011) explains, "Because  
humanness is made a political, conceptual category rather than a biological fact, certain  
208 humans can be defined as no longer fully human or deserving of 'human rights'" (1664).  
Mbembe infuses Agamben's theory of bare life with an acute analysis of the particular ways  
210 in which slavery, capitalism, and colonialism work to actively animalize humans through  
geographies of death (Hudson, 2011).

212

I take up necropolitics in order to infuse an analysis of making the man-eater with the  
214 political economy of land tenure contestations born out of violent colonial and post-colonial  
histories. I do this in order to show what kinds of *human life* are deemed acceptable to  
216 exposure to death through their relation to animal life. In this way, this isn't a story about the  
killability of tigers *per se*, but tigers as state subjects bestowed with certain rights and  
218 protections in relation to other human subjects with differentiating access to inclusion or

exclusion from what McIntyre and Nash (2011) have called the *biopolis* or *necropolis*. These  
220 are the spaces in which sovereign powers work to reproduce life on the one hand and spaces  
of “negation or socially dead” on the other (2011: 1467). Like biopolitics and necropolitics,  
222 their existences are entwined, both necessary to ensure their mutual reproduction (McIntyre  
and Nash, 2011).<sup>4</sup> Necropolitics and by extension the necropolis, which expands on the  
224 spatial characteristics of necropolitics Mbembe set out, becomes a way to name and  
historicize deathly encounter in the spaces of surplus populations’ excess. In this light,  
226 necropolitics is a means for theorizing the position of non-human animals as state subjects  
but whose own vulnerability and exposure to death are entangled in reproducing *less-than-*  
228 *human* geographies. *Less-than-human* geographies signals “what diminishes the human...not  
what renders it lively, but what cuts away at that life, to the point of, including and maybe  
230 beyond death” (Philo: 2017: 258). This is different from examining the kinds geopolitical  
violence of unjust social conditions enabling the death of ‘surplus populations’ through  
232 structural violence (Tyner 2013, 2015). Instead, a shift towards what activates certain  
geographies as ‘less-than-human’ is a turn towards examining acts of visceral, ‘direct’  
234 violence head on, in order to make sense of the geopolitical conditions that foreground these  
acts.

236

---

<sup>4</sup> A point on language- for there appears to be confusion in the literature over the different meanings between necropolitics and thanatopolitics- and in fact the terms are often used interchangeably in the geographical literature (Tyner 2015). I invoke necropolitics as I understand Mbembe did, in the context of how sovereign powers control the capacity to kill as a response to surplus population, and the geographical contours of space that enable this. This is different, for instance, than how Stuart Murray employs thanatopolitics to understand mobilising death as a political act of resistance against biopower— in his example, how suicide bombers engage death as politics (Murray 2006). My reading then is of thanatopolitics as a form of resistance to biopolitics through death, rather than necropolitics, which I read as another form of disciplining power over a sovereign population (Mbembe 2005).

It is necessary here to differentiate between negative interactions between species which  
238 emerge in landscapes humans and large animals co-inhabit, and those that are expressly  
necropolitical in nature. Doing so also helps to set a broader agenda for engaging with  
240 conservation as necropolitics. There is a large literature on human-wildlife interactions in  
India and what is commonly referred to in the conservation literature as ‘human-wildlife  
242 conflict’—a framework broadly understood as characterizing instances of negative  
interactions between species in which wildlife damage, destroy, injure, or kill people,  
244 people’s livestock, or other personal property people care for or rely on (Madden 2004;  
Peterson et al. 2010; Redpath 2015). There is nothing expressly necropolitical about negative  
246 interactions between humans and wildlife when taken at face value, such as crop raiding by  
elephants or livestock predation by tigers or leopards. There are instances in which these  
248 kinds of negative interactions might be characterized through the lens of structural violence  
(Tyner 2013; 2015), as persistent social inequalities can produce the conditions in which  
250 certain communities are more vulnerable to the impacts of negative encounters with wildlife  
than others (Ogra 2008; Massé 2016; Margulies and Karanth 2018; Rai et al., 2018). But here  
252 an important distinction must be drawn between incidents of negative interaction between  
humans and wildlife and accounts like that of the man-eating tiger in Gudalur as an  
254 expression of conservation necropolitics. Without diminishing the significant material,  
bodily, and emotional impacts that incidents of human-wildlife conflict can produce (Jadhav  
256 and Barua 2012; Barua et al. 2013), to be understood as necropolitical acts I argue there  
should be evidence of calculation in (re)producing deathly spaces, where certain people are  
258 more systematically assured of exposure to greater risk of bodily harm and death compared to  
populations the state actively attempts to secure and maintain.

260

In the empirical case of the Gudalur man-eater, this distinction will be made clear through a  
262 historical accounting of plantation workers in relation to the plantation necropolis, a spatial  
zone of exception that confirms the status of laborers as expendable lives when calculated  
264 against the state's biopolitical efforts to secure, maintain, and increase the state's population  
of tigers and other wildlife within the same landscape. As I will show, the tea plantation  
266 geography in Gudalur situated alongside a protected area landscape with one of the highest  
densities of elephants and tigers in the world reproduces conditions through which  
268 particularly marginalized workers are ensured of heightened risk of encounter with dangerous  
animals, both through their geographic proximity to the conservation biopolis as well as  
270 temporally, with worker movement in and out of the plantation landscape occurring at  
periods of time in which animal presence is also frequent. Framing these encounters as  
272 instances of 'human-wildlife conflict' serves to de-politicize the social and geographical  
conditions of necropolitical encounter by instead focusing on individual incidents of animal  
274 attack as unfortunate but ultimately 'natural' events.

### 276 3. METHOD

278 This work draws on 10 months of research conducted in 2015-2016 while living in the town  
of Gudalur in the Nilgiris District in western Tamil Nadu State. Gudalur is also the name of  
280 the taluk, or minor administrative district, where the tiger was killed on the Wood Briar  
Estate near the village of Devarshola near the border of Mudumalai Tiger Reserve. During  
282 this time I interviewed over 100 Kerala, Karnataka, and Tamil Nadu Forest Department staff  
working in this geographic region across three protected areas, in addition to conducting  
284 interviews with conservation and *adivasi* rights activists and NGO staff, wildlife biologists,  
and local political groups. This represents an active choice in 'studying up' (Nader, 1972,

286 2011), to more explicitly take notice of the individuals embedded within institutions of power  
often poised as monolithic actors in and of themselves. I make this choice to focus my  
288 research efforts within institutions of state power explicit here in order to clarify which  
voices are presented as more active and present than others in my analysis. This research is  
290 further informed by close readings of secondary materials including historical gazetteers and  
colonial-era travel writings, policy briefings and reports of state-level forest departments,  
292 central government materials of the Indian Forest Service, the National Tiger Conservation  
Authority (NTCA), as well newspaper reports surrounding the events of man-eating tigers in  
294 the Gudalur region in 2015 and 2016.

296 In what follows I chart the history of Gudalur as a postcolonial landscape. I do this to  
contextualize the production of spaces in which certain people are actively made more  
298 vulnerable in exposure to deathly encounters with animals than others.<sup>5</sup> This sets the terms  
for a reading of the Gudalur tea plantation landscape as a conservation necropolis.

300

#### 4. PRODUCING THE PLANTATION

302

##### *4.1 Landscapes of Exception*

304

Concerted efforts to ‘open up’ the Gudalur region for colonial extractivist activities began at  
306 the turn of the 19<sup>th</sup> Century. The British did not attempt to disrupt the traditional feudal  
landholding system of the *janmis*, nobility who held absolute and hereditary claim by birth to  
308 lands which they leased to tenant farmers and later British planters, after the fall of the

---

<sup>5</sup> For a close reading of the biopolitical stakes of vulnerability and exposure in contemporary issues of global environmental change, see Cavanagh, 2014.

Pychee Raja in Wayanad in 1805.<sup>6</sup> Instead, as Menon et al. (2013: 453) explain, “areas under  
310 the control of *janmis* could be better characterised as zones of accommodation, zones in  
which the British chose to recognise local *janmis* as a conduit through which to eventually  
312 raise revenue.” Under British colonial rule, land was largely classified as productive  
agricultural land, reserved forest [e.g. for timber management], or ‘wastelands’— a category  
314 comprising of ‘unimproved’ lands suitable for cultivation or economically ‘unproductive’  
forests (Gidwani, 2008; Gidwani & Reddy, 2011). Today, these ‘wastelands’ would be  
316 characterized as tropical evergreen, moist deciduous, and semi-deciduous forests and  
grasslands (Prabhakar, 1994; Prabhakar and Gadgil, 1998). In order to ‘improve’ these lands  
318 beginning in the late 19<sup>th</sup> Century, the principal aim of forest management was the increased  
production of teak and other hardwoods. Areas without valuable hardwoods (or after their  
320 wholesale extraction) were transformed into coffee, rubber, cinchona, and tea plantations,  
with tea eventually becoming the predominant cash crop in the region for both large  
322 plantation holders and smaller scale farmers (Thurston, 1913: 17, 113; Prabhakar, 1994;  
Menon et al., 2013).

324

The production of the plantation landscape in the Gudalur region is a history of accumulation  
326 by dispossession (Harvey, 1996; McIntyre and Nast, 2011), which foregrounds the region’s  
eventual position as a site of intense land tenure conflict (Raman, 2010).<sup>7</sup> These lands were  
328 already inhabited by a variety of different peoples prior to colonization, including a large  
number of what are now referred to as *adivasi* communities, indigenous or first peoples

---

<sup>6</sup> Pychee Raja led an armed resistance against the British occupation after the fall of the Mysore Kingdom following the killing of Tipu Sultan by British armed forces in 1799.

<sup>7</sup> Ravi Raman (2012) provides the most comprehensive and insightful investigation of tea plantation labor and how it is historically situated within the world economy.

330 (notably the Kattunaikan and Kurumba tribes, but also Paniya).<sup>8</sup> Unsurprisingly, it was many  
of the ‘wastelands’ described above that were the lands being worked and lived in by many  
332 *adivasi* communities (Burton, 1900; Thurston, 1909). Following the armed resistance of the  
Pychee Raja against the British occupiers, *adivasi* communities were forcibly evicted from  
334 their lands, or forced into bonded or indentured labor on commodity and agricultural  
plantations (Menon et al., 2013; Raj, 2013; Raman, 2010; Thurston, 1909; 1913: 17).<sup>9</sup>  
336 Through a series of legislative acts including the Forest Acts of 1865, 1878, and later 1927,  
the British Crown vested all ‘wastelands’ [forest] and uncultivated lands to the Crown (Hedge  
338 and Enters, 2000; Krishnan, 2009). These were important acts for ensuring that ‘wastelands’  
became productive as economic ‘forests’ (e.g. timber plantations). With the passage of India’s  
340 Forest (Conservation) Act (1981) and then Wildlife Protection Act (1972), many of these  
forests, often adjacent to tea plantation landscapes, were converted into protected areas for  
342 conservation, including what is now Mudumalai National Park in Tamil Nadu (Hegde &  
Enters, 2000; Krishnan, 2009).

344

Today Gudalur taluk comprises 12 revenue villages (~749 km<sup>2</sup>), and slightly less than half of  
346 this land is classified as *janmam* lands, as opposed to government *ryotwari* revenue lands  
(Krishnan, 2009). The tea plantation landscape of this region had three primary waves of  
348 expansion in the Nilgiris, with three concomitant influxes of workers. The first influx of labor  
occurred in the late 19<sup>th</sup> Century with the initial expansion of tea, which occurred with the  
350 conversion of coffee plantations into tea after a series of devastating coffee blights. Tea

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<sup>8</sup> *Adivasi* translates as “first people” or “original inhabitant” in Hindi, and refers to the “Scheduled Tribes” of India as designated in the government census.

<sup>9</sup> In the Janmi period these landscapes were already sites of *adivasi* exploitation, in which *adivasis* in particular were kept as bonded labourers or outright slaves (*adscripti globae*), whose tenure to the land were transferred to colonial lessees.



picking is a daily activity, and the switch from coffee to tea resulted in a shortage of laborers  
352 to work in the more intensive production and harvesting of tea compared to coffee (Raman,  
2010; Raj, 2013). The second influx came during the Grow More Food campaign beginning  
354 in the 1940s and 1950s, with the third and largest influx of plantation workers arriving  
following the 1964 Indo-Ceylon Agreement (Menon et al., 2013). At this time Tamil  
356 repatriates were brought to the region from Sri Lanka to work on the newly formed  
government-owned Tamil Nadu Tea Plantation Corporation (TANTEA) developed for the  
358 purposes of Tamil repatriate resettlement (Menon et al., 2013). These plantations were largely  
carved out of State Reserve Forest. In time, additional Tamil repatriates came to also work on  
360 privately held *janmam* plantations. As the number of migrant workers on tea estates came to  
settle in the Gudalur region, *adivasi* dispossession of land continued. The proletarianization  
362 of *adivasis* in the 20<sup>th</sup> Century continued through rampant land alienation with influxes of  
settlers from the Kerala coast, again during the Grow More Food campaign (Steur, 2011).  
364 During this time many *adivasis* came to work as agricultural wage labourers either for settlers  
(primarily from Kerala), or in some cases as plantation labourers (Raman, 2010; Raj, 2013).  
366 Table 1 is a summary of Gudalur's tea estates, including the government-owned TANTEA  
estates, holdings of publicly-traded corporate holdings (Hindustan Unilever), as well as  
368 smaller, private estates. Given illegal expansion of tea cultivation in the region on plantation  
lands, which will be discussed further below, the actual area under tea cultivation is likely  
370 much greater than the percentages presented in Table 1.

#### 372 *4.2 'Progressive' politics and landscapes of ambiguity*

374 The middle of the 20<sup>th</sup> Century saw a series of progressive labor and land reform acts passed  
in Kerala and Tamil Nadu with the intention of improving labor conditions for plantation

376 workers and to settle land rights in the region through the abolishment of the *janmam* system.  
The Tamil Nadu Gudalur Janmam Estates (Abolition and Conversion into Ryotwari) Act of  
378 1969 (henceforth *Janmam* Act) was intended as a progressive act of legislation to secure  
*patta* or land titles for tenants on *janmam* lands with expired leases. In its original intent, the  
380 government agreed to compensate the *janmis* and turn title of land over to legitimate tenants.  
With the exception of two estates that purchased *janmi* rights prior to the 1969 Act, all other  
382 tea estates in the Gudalur region came under what the Act identified as ‘Section-17’ lands.  
According to the Act, estate tenants would obtain title for cultivated lands on their estates,  
384 while the State Revenue and Forest Departments would take control over uncultivated lands.  
The aim of the act was therefore to transfer ownership of lands under productive cultivation  
386 by estates to the estate owners themselves, while transferring all other land ownership back to  
the state (Krishnan, 2009). With the exception of one estate, the majority of land within  
388 estates fell under the categories of ‘uncultivated’ or ‘forested’ lands,<sup>10</sup> which would mean that  
estates would lose significant land holdings should the Act be implemented (Krishnan, 2009).  
390 All *janmam* leases in Gudalur have since expired, but despite 50 years since the passage of  
the *Janmam* Act the matter of its implementation has been held up in India’s higher courts  
392 (including the Supreme Court), as estate owners and present-day *janmis* have filed writ  
petitions questioning the various statutes of the Act and its legality. In lieu of the Act’s  
394 implementation, what has ensued instead is a half-century of litigation and contestation in the  
courts over who holds legal claim over formerly leased *janmam* lands.

396

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<sup>10</sup> A significant parallel debate to the contestation over the *Janmam* Act relates to the very definition of forest in India, which again traces its history back to Gudalur, when the Nilambur Kovilangam, TN Godavarman, filed a case in the Supreme Court after witnessing the rampant deforestation taking place in Gudalur as a result of land ‘encroachment’ when he drove through the Gudalur area in the 1990s. See Menon et al., 2013 for a detailed discussion of the implications of the Godavarman Judgement for defining forest in Gudalur and its relations to the *Janmam* (1969) Act.

Within this legal ambiguity, tea plantation landscapes have flourished as zones of exception.  
398 As Krishnan (2009) explains, in the most comprehensive study of the *Janmam* Act to date,  
“With a legally tenuous status, leased landscapes have also emerged as realms of ambivalent  
400 control. Both the state and planters were unable to, or abstained from, exercising power in  
any conclusive manner given the legal ambiguity” (Krishnan, 2009: 291). In practice, this  
402 ambiguity has led to tea estates expanding cultivation in order to reduce the amount of land  
they might lose should the Act be implemented (Krishnan, 2009). More dramatically,  
404 Section-17 lands have been occupied by migrant and tenant farmers, many of whom are  
workers on plantation estates employed as casual, temporary workers so that estates are not  
406 required to provide the services, benefits, and protections full-time plantation labourers are  
provided by law under the Plantation Labour Act of 1951 (Besky, 2008). Estates have also  
408 been accused by the government of encouraging workers and tenant farmers to occupy  
uncultivated tracts of estates to plant with tea and other commodity crops (especially during  
410 booms in tea, black pepper and ginger markets), thus ensuring that additional lands could not  
be surveyed as ‘forest’ under the Section-17 stipulations.

412

What has resulted in the Gudalur region, particularly in O’Valley and Devarshola (where the  
414 man-eating incident in 2016 occurred), is a dramatic decline in forest cover over the past  
several decades and a concomitant increase in the expansion of the built environment in line  
416 with the region’s growing population of unsettled occupants, who now wish to claim land  
title under the *Janmam* Act as the lands’ legitimate tenants (often through securing false  
418 titles). As of a 2002 government survey, over 50 percent of undeveloped ‘forest’ land on  
estates had disappeared since the 1969 Act was notified and surveyed in 1974, with a  
420 corresponding increase in developed areas of plantations from 19,700 acres to 25,757 acres,  
with another 10,928 acres in additional cultivation by occupying famers (cited from

422 Krishnan, 2009: 291). In the process, villages and dispersed settlements have sprung up as  
sizeable towns without formal land rights.

424

These issues remain contested despite Supreme Court orders for the Forest and Revenue  
426 Departments to implement the *Janmam* Act. The state government faces the dilemma of what  
to do about ‘encroacher’ occupants on Section-17 land that is supposed to be vested back to  
428 the state, as it was previously surveyed as ‘forest’, but is now under cultivation or even  
developed as settlements. The most recent orders from the Court, given in a judgement in  
430 March 2018, also dictates that estates should compensate the Tamil Nadu government for  
destruction of forest since the 1969 Act was first notified and lands were surveyed. But whom  
432 should be considered rightful landowners, given the dramatic increase in population since the  
*Janmam* Act was notified, especially in the context of the histories of this landscape as  
434 originally appropriated from *adivasi* communities during pre-colonial and colonial periods,  
remains a matter of heated debate.

436

The production of tea estates as landscapes of exception in Gudalur shapes them as sites of  
438 vulnerability and exposure for workers, including exposure to animal encounter. Located at  
approximately 11°30’ N, Gudalur’s average sunrise and sunset times range between roughly  
440 6-6:30 AM and 6-6:30 PM, respectively, depending on the season. In accordance with the  
Plantation Labour Act, estate owners are legally permitted to require laborers to work  
442 anytime between 6 AM and 7 PM. Dangerous encounters with wild animals by humans in  
South Indian plantation landscapes tend to occur in the early morning or evening, when  
444 human visibility is lower and laborers are either headed to or from the fields for work  
(Kumar, Mudappa, & Raman, 2010). As the Mudumalai Tiger Conservation Plan indicates  
446 based on camera trap data, these are the times when both leopards and tigers are most

actively hunting (Singh, 2014: 76). While the Plantation Labour Act was meant to ensure the  
448 well-being and safety of plantation workers, guaranteeing them housing, health care, rations  
and schooling for children (Besky, 2008: 2), many tea plantations on *janmam* lands remain  
450 vulnerable spaces for laborers because plantation labor laws are inconsistently followed or  
applied. While the progressive land and labor acts of the mid-20<sup>th</sup> Century appear well-  
452 intentioned in improving worker safety and settling *janmam* lands with formal land titles, in  
Gudalur, they have had led to the scenario of solidifying these landscapes as precarious  
454 spaces for some of India's most marginalized peoples who work on lands they do not own.  
As 'necropolitans' residing and working within the plantation landscape, laborers are  
456 predisposed to the hazards of confinement within a spatio-temporal environment of  
heightened exposure to interspecies encounter along the boundaries of a high-priority tiger  
458 conservation area (McIntyre and Nast, 2011). Plantation laborers are poorly paid, often  
housed in abysmal and precarious housing, and unprotected by inconsistently enforced labor  
460 laws that employers contest. The laboring population is predominately composed of Sri  
Lankan Tamil repatriates, *adivasis*, Dalits ('untouchables'), and lower-caste migrants from  
462 other parts of India. Echoing McIntyre (2011: 19): "Race becomes a marker not just of  
irregularly offered employment, but a marker that one deserves the misery to which one is  
464 consigned."

466 But it is not just animal temporalities that predispose plantation laborers to heightened risk of  
dangerous animal encounter. Just alongside this plantation landscape is one of the most  
468 important wildlife conservation complexes in South India, made up a series of national parks,  
wildlife sanctuaries, and reserve forest. As half of a "dialectical spatial unity" conjoined to  
470 the biopolis (McIntyre and Nast 2011: 1472), the tea plantation landscape serves as a space of  
economic productivity, but does so alongside this space of non-human biopolitical

472 reproduction and securitization. In what follows, I describe how the plantation necropolis is  
sutured to the conservation biopolis through the animals that weave through them, on the one  
474 hand disrupting the administrative and bureaucratic practices of spatial purification,  
territorialization, and separation at the heart of postcolonial statecraft, but on the other  
476 reinforcing the interwoven relations between race, class, and efforts to conserve and protect  
animals (Kim 2015; 2017).

478

## 5. PROCEDURES OF KILLING

480

Found at the tri-border junction of Kerala, Tamil Nadu, and Karnataka are a set of protected  
482 areas, two of which are notified as Tiger Reserves (Mudumalai Tiger Reserve in Tamil Nadu,  
Bandipur Tiger Reserve in Karnataka), the strictest notification of conservation space in  
484 India. Tiger Reserves, unlike National Parks or wildlife sanctuaries without this additional  
notification, not only fall under the jurisdiction of individual states and the Central  
486 Government Indian Forest Service, but must also develop approved management plans in  
accordance with the National Tiger Conservation Authority (NTCA). The NTCA oversees all  
488 tiger conservation programs in India. In 2013 the NTCA developed a “Standard Operating  
Procedure to deal with emergency arising due to straying of tigers in human dominated  
490 landscapes” (No.15-37/2012-NTCA, 2013). The document contains lengthy procedures and  
protocols for “for dealing with incidents of tiger straying in human dominated landscapes”  
492 (2). The purpose is “to ensure that straying tigers are handled in the most appropriate manner  
to avoid casualty / injury to human beings, tiger, cattle and property” (2). What follows is an  
494 itemized 22 bullet-point standard operating procedure (SOP) for how to handle a stray tiger  
(or leopard—the SOP is inconsistent in discussing only tigers or tigers and leopards) in a  
496 human-dominated landscape.

The 22 action steps of the SOP include the constitution of a committee for “technical  
498 guidance and monitoring” of the strayed cat, establishing “identity of the tiger by comparing  
camera trap photographs with India’s national camera trap repository,” and carrying out  
500 “detailed research” in order “to assess the reasons for the frequent tiger emergencies in the  
area.” Several of the guidance steps refer to issues of maintaining law and order: “In all  
502 instances of wild carnivores like tiger / leopard straying into a human dominated landscape,  
the district authorities need to ensure law and order by imposing section 144 of the Criminal  
504 Procedure Code.” This act dates to the British Raj and was first used to disrupt and quell  
protests during the Indian Independence movement; it prohibits any assembly of five or more  
506 people in an area where it has been imposed and cannot exceed two months. The maximum  
punishment is three years imprisonment for failing to comply.

508 What follows are a series of protocols on how to tranquilize a tiger, in the event trapping the  
animal is unsuccessful. It is to be determined by the Chief Wildlife Warden (CWW) of the  
510 state whether or not the animal should be relocated to the wild or placed permanently in a  
zoo. Next are more guidelines on reducing the possibility of causing panic or a mob,  
512 including establishing a forest department media liaison and more noteworthy, “in case  
monitoring using camera traps (Phase-IV) is on-going in the area, the minimum tiger  
514 numbers based on individual tiger captures, should not be given undue publicity without due  
cross checking with the National Tiger Conservation Authority” (5). This is to minimize the  
516 possibility of over-extrapolating about the number of tigers in an area without a firm grasp of  
their real population size (as camera traps may capture images of the same tiger many times).  
518 But as interviews revealed, this is also to reduce public anxieties about the number of tigers  
that might have already inhabited the landscape but were simply hitherto undetected.

520 It is in Annex II that the protocols for the “Declaration of Big Cats as ‘Man-Eaters’” are  
described (Annexure II: 17). The first bullet point of the annex begins: “Both tiger as well as  
522 leopard are known to cause habituated loss of human life (man-eaters). Such confirmed  
‘man-eaters’ should be eliminated as per the statutory provisions provided in section 11 of the  
524 Wildlife (Protection) Act, 1972.” It then reiterates the parallel statutes of the WPA that the  
CWW has the sole authority to declare a tiger or leopard a man-eater, and that he or she must  
526 also do so in writing and explain the reasons for the declaration. Various protocols are then  
put forth with how to handle a man-eater, including the assembly of a committee, camera  
528 trapping, and positive identification of the animal prior to any consideration of declaring a  
man-eater. An important point reiterated several times in the protocols is how essential it is  
530 for it to be clear that the animal is indeed a ‘habituated’ man-eater and not an animal that has  
killed a person or persons due to ‘chance encounter’:

532 As most of our forests outside protected areas are right burdened, the probability of chance  
encounters is very high...The declaration of an aberrant tiger / leopard as a man-eater  
534 requires considerable examination based on field evidences. At times, the human beings  
killed due to chance of encounters may also be eaten by the animal (especially an  
536 encumbered tigress in low prey base area). However, such happenings are not sufficient for  
classifying a tiger / leopard as a ‘man-eater’, which can best be established *only after*  
538 *confirming the habituation of the aberrant animal for deliberate stalking of human beings,*  
*while avoiding its natural prey.* (Annexure II: 18, my emphasis).

540 What follows are the protocols necessary for going about killing the animal as an absolute  
last-resort, including the requirement for a written statement from the CWW explaining the  
542 justification for declaring the animal as a man-eater and the appropriate bore size of weapons  
which should be used for its destruction.



544 I outline the complex bureaucratic procedures the Indian Forest Department is mandated to  
follow in order to consider how bureaucratic visions of space, nature, and landscape also  
546 figure into our understanding of the production of man-eaters and related enactments of  
deathly spaces. In turning to necropolitics and the necropolis in the context of postcolonial  
548 tea landscapes as zones of exception (and in moments of human-animal encounter, zones of  
exceptional death), I wish to draw out how the quotidian bureaucratic processes that exist on  
550 paper must be understood as occurring within ambiguous spaces through which state power is  
unevenly exerted.

## 552 6. THE MAN-EATER THAT WASN'T

A week after the incident of the Gudalur man-eater I met with a high-ranking Forest  
554 Department officer from Tamil Nadu who worked to capture the tiger. In addition to the  
incident itself, we also discussed the question of responsibility, and the complex relationships  
556 forged between deadly animals, marginalized communities, and the state apparatuses tasked  
with conserving species. Shot through these conversations were the contours of state  
558 territoriality, conservation as biopolitics (Biermann and Mansfield, 2014), and the friction  
produced when animals transgress administrative boundaries intended to signify the limits of  
560 their geographic acceptability. Speaking of another man-eater from the previous year and the  
Tamil Nadu Forest Department's attempts to quietly push the tiger West across the Kerala  
562 border, the officer said:

I know it isn't ideal, but once an animal crosses that border, it really isn't our issue  
564 anymore...Of course that isn't how these things really should be dealt with, but we  
have jurisdictions animals don't understand. If a tiger kills a man in Kerala and then  
566 kills a woman in Tamil Nadu, whose tiger is it? These animals are smarter than  
anything, we can't just keep them in one place...We are putting borders up they do not

568           respect. They do not see Kerala, or Karnataka, or Tamil Nadu. They see forest, and they  
          have just as much right to exist here as we do.

570   And yet, the ways in which the Indian Forest Service and state Forest Departments attempts  
to govern wild animals in India would suggest the contrary, that they very much *do* believe  
572   animals understand administrative boundaries. There are deep contradictions between how  
the state attempts to govern animal populations as biopolitical subjects through spatial  
574   separation and enclosure, and how individual state actors understand individual animals to  
navigate space, as evidenced above.

576

Tigers are territorial animals, and in territorializing space, individual tigers, especially males,  
578   compete with one another in contests over their respective domains. An increasing population  
of tigers will therefore require an increasing amount of space in which to live, and a prey  
580   base to support their sustained reproduction (Wikramanayake et al.,1998). Debates about the  
total population size and density of tigers in India and within the region are a matter of  
582   intense, even at times vitriolic debate between wildlife ecologists and tiger biologists  
(Gopalaswamy et al., 2015; Harihar et al., 2017; Karanth, 2011; Qureshi et al., 2018). In the  
584   context of Mudumalai National Park and the broader Mudumalai-Bandipur-Wayanad-  
Nargahole landscape, tiger numbers have been steadily rising for at least the past decade  
586   (Table 2). As of the 2014 India Tiger Census, this landscape was determined to have 570  
tigers—more than any other single landscape in the world (Jhala et al., 2015: 14). As of 2014,  
588   Mudumalai National Park was assessed to have 74 tigers, or a tiger density of 20.4/100 km<sup>2</sup>,  
“at par with the some of the best Tiger Reserves in India and far exceeds those in rest (sic) of  
590   Asia” (Singh, 2014: 236-237; Figure 1). According to Mudumalai’s current Tiger  
Conservation Plan, this density matches the park’s estimated carrying capacity, or even  
592   exceeds it, based on prey density calculations (Singh, 2014: 134). So while the Mudumalai

594 Tiger Conservation Plan acknowledges that the “carrying capacity of tiger in the core [the  
596 extent of the National Park] is saturated,” there is no indication in the management plan that  
598 efforts in the future will shift to maintaining a population of this size. On the contrary, the  
600 plan suggests means by which non-native species might be removed from the former timber  
602 plantation turned protected area to continue supporting a growing tiger population without  
604 limits (2014: 135). To that end, the second of three primary management goals for the park is  
“increasing the range and abundance of tigers, co-predators and prey *outside* Mudumalai  
Tiger Reserve by enhancing source-sink connectivity and development of dispersal  
corridors” (Singh, 2014: 124, my emphasis). And yet the management plan, inclusive of  
Mudumalai’s buffer zone management plan, is opaque regarding where exactly these tigers  
might live or roam, or what the consequences of this growing population will mean for long-  
term wildlife management beyond the park’s borders.

606 The Tiger Conservation Plan for Mudumalai articulates the perspective that tigers “prefer  
undisturbed areas of the reserve that connects adjoining contiguous habitat” and that they are  
608 “intolerant” of the disturbed habitat outside of the reserve (Singh, 2014: 70). And yet at the  
same time, the plan makes no mention of an idealized tiger population for the region—the  
610 implication of the plan’s objectives is that more tigers signifies a better tiger reserve and  
better tiger conservation management outcomes. Written into the plan is the inherent  
612 contradiction of state practices of conservation territorialization: the political spatial  
enclosure of animals seeking to preserve ‘inviolable space’ for ‘wildlife’ and ‘wild animals’  
614 without taking into account their movement, impermanence, and dynamism (Ingold, 2005).  
This is not to suggest that tiger populations should not be enabled to live and reproduce as  
616 biopolitical subjects as a consequence of capital-intensive commodity agriculture dominating  
once-forested landscapes where tigers previously roamed in greater numbers. Rather, I argue

618 that the state has chosen to deliberately intervene into the lifeworlds of tigers and goes to  
great lengths to assure their flourishing. The state’s conservation apparatuses must therefore  
620 acknowledge their responsibilities to citizens who live in close relation to the conservation  
biopolis, drawn into the plantation necropolis through a history of colonial dispossession. In  
622 reading across the long history of whose lives are secured and those whose are not in  
conserving tigers, these mortal interspecies calculations are imprinted with the racialized  
624 logics of Gudalur’s colonial history that reduce certain human lives to an impoverished  
existence in the maintenance of the plantation—codified through the necropolitics of tiger  
626 conservation.

628 Govindrajan (2015: 34) notes in her own accounting of a man-eating leopard in Central India  
that “human-wildlife conflict is shaped by the unruly nature of human and nonhuman animals  
630 inhabiting geographies that overlap and intersect and are themselves unruly.” But to ignore  
the explicitly political context underpinning encounters between big cats and other large  
632 mammals with certain kinds of people in telling the story of the Gudalur man-eater would be  
to pay insufficient attention to the role of the state in mediating these encounters and the  
634 inherent contradictions that exist between state bureaucratic conservation practices and the  
biogeographies of the animals they seek to govern as biopolitical subjects. Increasing  
636 incidents of human-wildlife conflict and public attention to them, both by political parties and  
the media, had reached a fever pitch by the time I was conducting fieldwork in and around  
638 Gudalur in 2016. Over the course of just a few months, widespread strikes were held in  
Gudalur District in protest of what various political parties felt was the ineptitude of the  
640 Forest Department to deal with mounting incidents of violent interactions between people  
and wild animals. It was an election year in Tamil Nadu and *the* primary topic of political  
642 parties on both the right and left were regarding ‘human-wildlife conflict.’ During the riots

that broke out just a year prior following the deaths of two individuals, an *adivasi* man in the  
644 neighbouring district of Wayanad in Kerala and a female tea plantation worker in Gudalur,  
forest department officers and conservation NGO employees were beaten up in a riot, and a  
646 Forest Department jeep was burned (Figure 2; Margulies, 2018).

So when the latest killing of the man from Jharkhand occurred in Gudalur, not only local, but  
648 state level bureaucrats understood the slow pace of the bureaucratic machinery's paper-  
shuffling would be unable to stop an all-out riot. What happened in Gudalur was something  
650 quite exceptional when compared to other accountings of man-eating cats in India that  
remained on the prowl for months at a time in India in the past, slowly adding names to their  
652 human body count (Mathur, 2016). Almost immediately following the man's death, the Field  
Director of Mudumalai Tiger Reserve, in coordination with the Gudalur District Forest  
654 Officer, set up an encampment in the tea estate where the tiger was believed to be hiding. For  
over a week the tea plantation became a veritable battlefield with 150 law enforcement agents  
656 including a Special Tiger Protection Force with tiger sniffing dogs from neighboring  
Karnataka and the Tamil Nadu Reserve Police Force poised against one common enemy- an  
658 old and injured, increasingly hungry tiger.

660 While the Gudalur tiger was eventually killed, it never actually became a man-eater, at least  
not in the formal sense as described in the prior section. The committee required by the  
662 NTCA provisions for declaring a man-eater was formed, but it never formally declared the  
tiger a man-eater because of insufficient evidence it was a 'habituated' killer. Unless the tiger  
664 continued to eat people, the committee argued they were unable to declare him a man-eater;  
and yet, given the charged political atmosphere, nor did they feel they could afford to wait for  
666 the tiger to kill again. As the NGO representative of the committee reported publicly to the  
media: "The tiger did in fact eat the human prey. As per the law, if a tiger eats only one

668 human prey, it cannot be declared a man-eater. But at the same time we cannot wait for  
another kill in order to confirm it as a man-eater because people's lives are at stake.”  
670 Conveyed in this statement is the friction at work in competing modalities of state  
bureaucratic time (Mathur, 2016). The committee had to wait to declare the tiger a man-eater,  
672 but they ‘could not wait’ in this instance because people's lives were at stake and in this  
instance, the media, the public, and politicians were watching. And yet to wait is precisely  
674 what they were legally compelled to do. The pace of these state apparatuses moving at  
different speeds against each other produced an entropic release of force— a tiger shot from  
676 all angles in ‘self-defense’ by police, who in so doing also shot themselves. Like the tiger the  
year before, the tiger both had to be and could never be a man-eater.

678

For the elements of the state bureaucracy on the ground, there was no easy choice. To declare  
680 it a man-eater they would have to wait for more people to die, and in so doing, face the threat  
of public uprising that had been mounting for years in response to the uneven political  
682 geographies of vulnerability and insecurity produced through uncertain land tenure claims.  
On the other, they could hastily declare the tiger a man-eater but later face admonishment by  
684 the National Tiger Conservation Authority for failing to follow the mandated protocols, as  
well as perhaps the international NGOs who offer training, technical assistance, and funding  
686 to the Forest Department, and even larger agencies like the World Bank who have invested  
significant funding in tiger conservation for over a decade (i.e. The Global Tiger Initiative).  
688 These institutions expect to see their financial investments awarded with increasing tiger  
populations, not increasing tiger deaths.

690

### *6.1 On the deadly encounter*

692

In the context of human-wildlife encounter in Gudalur, the ‘contact zones’ of encounter  
694 between humans and animals are enmeshed in contestations over the constitution and  
separation of conservation biopolitical space in relation to the necropolitical space of the  
696 plantation (Haraway 2008: 216; McIntyre & Nast, 2011). Encounter value helps theorize the  
commodification of when and where species meet—for instance, how chance encounter with  
698 charismatic wildlife generates capital through spectacular accumulation (Barua 2016b; 2017;  
Brockington, Duffy, & Igoe, 2008; Igoe, 2010; Igoe, Neves, & Brockington, 2010). As Barua  
700 writes, “An encounter poses problems; it reconfigures identities, space, political economies”  
(Barua, 2016, p. 265). But what of encounters that humans wish to avoid, in which encounter  
702 isn’t convivial or ambivalent (Ginn, 2014), but where encounter spells death? It is within this  
context that the literature in animal and more-than-human geography tends to fall short of the  
704 normative political commitments to justice that (at least some) political ecology asserts as  
essential (Mann, 2009; Loftus, 2017). There are easy slippages that disable animal  
706 geographic theory from advancing critically across a terrain of justice and for whom, enacted  
across various kinds of difference, when animals as individuals are divorced from how the  
708 state ascribes value and protections onto them at the level of the population. On the one hand,  
literature on animals as ‘lively commodities’ advances a better understanding of the role of  
710 animals as sentient subjects in the circulation of capital through conservation landscapes, but  
is generally less attentive to the everyday encounters through which particular wild animals  
712 are engaged in acts of destruction and violence (Collard, 2012; Collard & Dempsey, 2013;  
Barua, 2016b; 2017). The case of the Gudalur man-eater reveals a less-than-human  
714 geography of exposure, where the biopolitics of governing conservation space as a zone of  
accumulation through wildlife reinforces the necropolitics ruling the plantation as a zone of  
716 exception, in which marginalized and racialized classes and castes of people are maintained  
within spaces of unrelenting precarity in the name of profit maximization.

718

But what of the animal in the case of the man-eating tiger; how does closer attention to the tiger itself, not as a species but as an individual, inform a more incisive political analysis?

720

Shot through the bureaucratic considerations of the tiger's killability as outlined above, there

722

is also the time and space of the tiger. Mathur (2014: 151), in describing how a man-eating leopard came to terrorize a small town for months in a remote region of Himalayan India

724

describes how understanding the time of the leopard was central to understanding the terror it instilled in the local community. Similarly, the Gudalur tiger created the conditions for chaos

726

through its own form of time, but it was equally the tiger's *biogeographic* collision with Gudalur's political economic history that created the man-eater that wasn't a man-eater.

728

Despite widespread understanding, even by Forest Department staff, that tigers do not merely 'stray out' of protected areas, they also live in and amidst peopled landscapes, it was the

730

tiger's act of 'transgressing' this invisible line of demarcation between 'the wild' and 'the human' that set the procedures for its death in motion. It is believed the tiger had been injured

732

in a territorial fight with a more dominant male tiger. In losing this territorial battle, the tiger may have left Mudumalai and entered into the tea plantation landscape in search of easier

734

prey. Or perhaps the tiger had been living within the tea estate for some time. The history of the tiger's geography, in this instance, remains uncertain.

736

The eventual killing of the tiger represented the collision of uncertain land tenure rights and

738

illegal development against the constitution of animal space and the space of the plantation, producing the conditions in which contestations between landless labourers, land occupants,

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the forest department, India's higher courts, and tea plantation owners converged. It is

therefore impossible to treat the incident of the man-eater of Gudalur as a simplistic issue of

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human-wildlife conflict—but rather, the man-eater highlights how misleading the framing of



744 ‘human-wildlife conflict’ as a static set of relations appears when viewed through the lens of  
history. As one local conservation NGO advocate complained of the handling of the man-  
eater, “It would be of great help to both humans and wildlife, if the government expedites the  
746 process of removing encroachments from [the] ecologically sensitive Nilgiri biosphere  
reserve, at the same speed with which they eliminated a male tiger in Gudalur.” This quote  
748 points to the entangled relations of the tiger with the now decades pending court cases over  
whom has land tenure rights in the contested forests, villages, and plantations landscapes of  
750 Gudalur. As Laurie and Shaw (2018: 16) compel: “We must challenge those autopsies that  
return “natural” causes of deaths. Social murder hangs across the truncated lives of  
752 capitalism. And we are complicit.” In this light, framing the incident of the Gudalur man-  
eater as an example of ‘human-wildlife conflict’ represents a strategy of anti-politics  
754 (Ferguson, 1990), de-politicizing both the state and plantation owners’ culpabilities in  
maintaining the uneven geographies through which dispossessed and marginalized workers  
756 are more systematically made more vulnerable to carnivore attack than property-owning  
classes in the region.

758

The story of the Gudalur man-eater highlights how tiger biogeographic space and tiger space  
760 as demarcated by the Forest Department and NTCA through the Tiger Reserve contest one  
another. As the protocol recommending that additional photographic evidence produced of  
762 tigers and possible tiger numbers in social landscapes be withheld from the public suggests,  
there is, on the one hand, the intractable notion in tiger conservation management efforts in  
764 India that tigers *should* live in government notified tiger protected areas, *not* elsewhere. And  
yet on the other, we see in this procedural action the acknowledgement by conservation  
766 experts within the bureaucratic apparatus that this is simply false—tigers *do* live outside  
Tiger Reserves. But in ‘straying out’ the tiger crossed a threshold of uncertainty between

768 biopolitical space and necropolitical space as conservation subject. The tiger also, through its  
unruliness, offers us an embodied geographic critique of state visions of animal space and the  
770 division between that which is human and that which is not. As Youatt (2008) writes,  
“because nonhumans constitutionally (rather than intentionally) refuse to internalise the  
772 meanings of human language, they are able to resist becoming self-regulating subjects to a  
significant extent, relying instead on their own semiotic interpretations of the environment  
774 and acting according” (394). The tiger’s mobility, in this sense, is inscribed with political  
significances, producing geographic contestations.<sup>11</sup> At the same time, as a formally  
776 recognized endangered species with strict laws regarding their protection and killability,  
tigers carry the law of the state in their very being, (re)producing spaces in which differential  
778 valorizations of life across the species divide are acted out. In this context, it does not seem  
an exaggeration when residents of the Gudalur area would exclaim that their lives were worth  
780 less than that of the tiger, for in many ways it is hard to see it as otherwise.

## 782 6. CONCLUSION

784 In this article I have shown how an analysis of the killing of a ‘man-eater’ in India requires  
engaging with the postcolonial political economy of the plantation landscape, and in doing  
786 so, presented biodiversity conservation as necropolitics. An analysis of the man-eating tiger  
in Gudalur, in its entangled relations with a host of other actors, reveals plantation landscapes  
788 as *less-than-human* necropolitical landscapes. Considering the death of the Gudalur man-

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<sup>11</sup> While discussing the active capacities of the tiger, it is beyond the scope of this article to interrogate deeper questions about the tiger’s agency and the growing literature on animal sentience within animal studies and animal geographies. However, I agree with Chris Wilbert (2006: 32), who writes about the agency of man-eaters, that it is helpful to think of animal agency as an *intra-active* process of becoming (following the work of Karan Barad), not internal to the individual subject but an emergent relation between beings, which draws attention to “the promiscuous mixings of our worlds.”

eater in the context of necropolitics is to interrogate how the state responds when tigers  
790 transform from biopolitical subjects to unruly individuals, and how the value of various kinds  
of species lives are inscribed in space in relation to one another. In arguing for a reading of  
792 this plantation-conservation landscape as a necropolitical landscape, I have sought to advance  
engaging with animals as political subjects (Barua, 2014; Hobson, 2007; Srinivasan, 2016),  
794 embroiled in (re)producing unjust political geographies of difference across species divides.

796 In advancing my argument, I drew on Achille Mbembe's (2003) theory of necropolitics for  
analyzing conservation geographies of deadly human-animal encounter within postcolonial  
798 landscapes. I did so in order to clarify the necessity of engaging with conservation landscapes  
as entwined products of colonial and postcolonial histories of capitalist accumulation by  
800 dispossession (Rai et al., 2018). My analysis of the space of deadly encounter between a  
'man-eater' in Gudalur is therefore situated in a historical reading of the plantation landscape  
802 as a zone of spatial exception. In analyzing both the political economic history of this  
plantation/conservation landscape alongside the procedures and practices of making the man-  
804 eater, I advance the value of necropolitical theory for understanding of some of the relations  
between animals and the state. I did so by considering the production of acceptability of  
806 death—both human and non-human alike—within a contested geography of both high  
conservation and agricultural commodity production value.

808

The case of the Gudalur man-eater is advanced through engaging with political animal  
810 geography as a subdisciplinary field of scholarship seeking to reinvigorate animal  
geographies with stronger attention to human politics and to expand political geography's  
812 engagement with animals as complex subjects worthy of intellectual engagement. The  
general lack of attention in political geography to animals as more than natural resources that

814 carry political significations has stunted theorizing the role and relations of animals to state  
power, despite a reinvigorated body of work bringing the state and its effects ‘back’ into  
816 contemporary discussions of the environment (Lunstrum 2018; Parenti, 2014; Robertson &  
Wainwright, 2013). There is much to be gained from continuing efforts to read across sub-  
818 disciplinary boundaries to develop more theoretically robust scholarship on animal relations  
with the state.

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## 8. FIGURE CAPTIONS

1060

Figure 1. Number of reported tigers residing within Mudumalai National Park by year. Data  
1062 obtained from the Tiger Conservation Plan for Mudumalai Tiger Reserve prepared for the  
National Tiger Conservation Authority (Singh, 2014).

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Figure 2. Tamil Nadu Forest Department jeep burned during protests following a prior

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incident of a man-eating tiger near Nellakotta, Gudalur in 2015.

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1084 9. TABLES

**Table 1.** List of tea plantations in Gudalur taluk, Nilgiris District, Tamil Nadu, India. Area planted and grant area shown are official records presented in hectares rounded to the nearest whole number. Percent in cultivation is the area planted divided by grant area as a percentage. Data sorted by tea area planted. Data is from 2015 and obtained from International Tea Database ([www.teadatabase.com](http://www.teadatabase.com)) and used with permission. TANTEA is the acronym of the government owned Tamil Nadu Tea Plantation Corporation.

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<b>Name</b>	<b>Company</b>	<b>Area Planted</b>	<b>Grant Area</b>	<b>Percent in Cultivation</b>
Wentworth Tea Estate	Harrisons Malayalam Ltd	611	1361	45
Rockwood Tea Estate	Hindustan Unilever Limited	433	877	49
Cherangode Tea Division	TANTEA Thiashola Plantations Private Limited	394	394	100
Davershola Tea Estate	TANTEA	357	1491	24
Marapalam Tea Division	TANTEA	350	510	69
Kolappalli Tea Division	TANTEA	344	416	83
Cherambadi Tea Division	TANTEA	342	390	88
Nelligalam Tea Division	TANTEA	334	335	100
Attikunna Tea Estate	M/S Parry Agro Industries Ltd.	328	913	36
Devala Tea Division	TANTEA	324	444	73
Mayfield Tea Estate	Harrisons Malayalam Ltd	308	807	38
Strathern Tea Estate	Parry Agro Industries Ltd.	305	632	48
New Hope Tea Estate	Manjushree Plantations Ltd.	299	3461	9
Seaforth Tea Estate	Mahavir Plantations Ltd.	275	1034	27
Caroline Tea Estate	Parry Agro Industries Ltd.	260	563	46
Terrace Tea Estate	United Plantations Ltd.,	239	239	100
Glenvans Tea Estate	Manjushree Plantations Ltd.	238	3045	8
Devon Tea Estate	Hindustan Unilever Limited	209	757	28
Quinshola Tea Estate	TANTEA	206	213	96
Sussex Group Tea Estate	Woodbriar Estate Ltd.	197	533	37
Woodbriar Tea Estate	Woodbriar Estate Ltd.	162	343	47
Rousdon Mullai Tea Estate	Rousdonmullai Tea Estates Pvt. Ltd.	122	359	34
Royal Valley Tea Estate	Sampath Tea Industries (P) Ltd.	111	186	60
Periashola Tea Estate	Panchura Estate Limited	107	246	43
Barwood Tea Estate	Barwood Estate	85	85	100
Silver Cloud Tea Estate	Silver Cloud Tea Estates (P) Ltd.	72	104	69
Bitherkadu Tea Estate	Woodbriar Estate Ltd.	55	85	64
Udayagiri Tea Estate	Sri K. Gopalakrishnan	47	48	98
Kurunberbeta Tea Estate	Shri K.P. Madhavan Nair	45	45	100
Kusumam Tea Estate	Kusumam Tea Plantations	39	39	100
Visalakshi Tea Estate	Visalakshi Estate.	38	61	63
Glenrock Tea Estate	Glenrock Estates Pvt. Ltd.	32	187	17
Nadukani Tea Estate	Nadukani Plantations Ltd.	32	130	25
Kalleri Tea Estate	Thai Plantations Ltd.	31	43	73
Bernside Tea Estate	Smt. E.R. Wapshare & Co.	24	24	100
Nelliyalam Tea Estate	TANTEA	23	23	100
Panchura Tea Estate	Panchura Estate Limited	22	201	11
Kumarappa Plantations Tea Estate	Shri A. Kumarappan,	21	98	21
Surrey Tea Estate	Shri S.V. Pappu Chettiar	20	20	100
Parkglen Tea Estate	Parkglen Estate	20	20	100

C.T.A. Tea Estate	C.T. Alvikutty & K. Pathuma Ltd.	10	10	100
Sudarsana Tea Estate	Sudarsana Estate Private Ltd.	10	10	100
Solai Malai Tea Estate	Shri S.S.P. Subramanium Chettiar	10	12	79
Mani Tea Estate	Shri S.S.P. Subramanium Chettiar	10	10	100
Gavipara/ Nalini Tea Estate	Elixir Plantations Pvt. Ltd.	10	10	100
Shri Meenakshi Tea Estate	Shri K.M. Kashi M.A	5	21	24

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**Table 2.** Estimated number of tigers per state and Western Ghats landscape (total) between 2006-2014. Numbers acquired from the National Tiger Conservation Authority. 2014 total is slightly higher than combined totals for three states presented because 2014 census included the state of Goa. Percentage change in tiger populations between census years listed in parentheses for comparison.

	<b>2006</b>	<b>2010</b>	<b>2014</b>
Karnataka	290	300 (3.5)	406 (35.3)
Kerala	46	71 (54.4)	136 (91.6)
Tamil Nadu	76	163 (114.5)	229 (40.5)
Western Ghats (Total)	402	534 (32.8)	776 (45.3)