



ROLE AND IMPACT OF GEOGRAPHICAL INDICATION LAW IN PROTECTING TRADITIONAL KNOWLEDGE

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ABSTRACT

In the present paper, it has been argued how the law on Geographical Indications (GI) provides the best way of protecting Traditional Knowledge (TK). It has been illustrated with reference to the Indian legislation enacted to provide domestic protection to the GIs and its provisions which recognize GIs as a sui generis form of IPRs. Unlike any other Intellectual Property Right (IPR), the protection granted by GIs to an object rests upon a whole community instead of an individual.

The evolution of the law on GIs starting from the Uruguay Round of GATT till the Doha Work Programme has been discussed in brief in order to demonstrate the ongoing conflict between the developed and developing countries over the extent of protection accorded to a GI object under the law. Further, criteria for the protection of TK under the GI have also been analyzed. The discussion is based on several aspects like equity and justice, protection of biological diversity, avoidance of biopiracy, etc. The interrelation between GI and TK has been established with respect to two types of protection, namely, constructive and defensive.

Examples have been taken from the state of Assam (India) to illustrate how the registration of certain objects under GIs have not only provided economic incentives to the locals but also facilitated the transmission of traditional skills within generations as well as ensured community identification and self-

governance. However, it must be pointed out that while GI provides a label or reputation to a product, it is not able to protect the knowledge base and the skill sets used in manufacturing the goods.

Finally, it has been concluded that even though GI may not replace TK completely, the former should be treated as an important complement to the latter in ensuring adequate protection. In fact, GI law must be made more robust in consonance with the overall intellectual property rights regime.

Keywords: Geographical Indications, Traditional Knowledge, TRIPS Agreement, Intellectual Property Rights, Biopiracy, Cultural Heritage, GI Act 1999, Muga Silk, Assam, Sui Generis Protection

INTRODUCTION

Geographical Indication (GI) refers to the concept whereby a mark on goods of a certain place of origin has a geographical origin, and has qualities, a reputation, or characteristics that are basically attributable to the place of origin.¹

A product is considered to have Geographical Indication when it is characterized as belonging to a specific region and is attributed with characteristics and features that are mostly related to the region. GIs are equally strong as intellectual property rights, which offer integrity, quality, and originality to local products. Legal protection against theft and counterfeiting, which may be harmful to local economies and cultural heritage, is offered by Geographical Indications.²

Articles 22, 23, and 24 of the TRIPS Agreement do not require much on protection of Geographical Indications. Geographical Indications however cannot be compared to generic labels, which indicate the country of origin of a particular product, such as a Made in India label. Such a difference is explained by the fact that these generic trademarks are associated not with regard to certain properties or popular values that a specific place possesses but with the region in which a certain product is manufactured.³

Geographical Indications are experiencing a surge in popularity throughout the world as a means of positive preservation and dissemination of Traditional Knowledge. They help communities to construct and protect markets of what they refer to as biocultural products. A Geographical Indication is a mark or a sign that determines the geographical origin of a product and relates it with certain features in that region. An example is the Allahabad Surkha, a rare and common type of the guava fruit that has a strange flavor in the area of the Allahabad district, Uttar Pradesh, India. Here we see the name Surkha, or red,

¹ WIPO, Geographical Indications, *available at*: https://www.wipo.int/geo_indications/en/ (last visited on March 22, 2026).

² Ganesh Makam, Geographical Indications and Cultural Protection in India: Harnessing Intellectual Property for Regional Development, SSRN 1 (2023) *available at*: <https://ssrn.com/abstract=4490648> (last visited on Mar 22, 2026).

³ Yashwardhan Singh, Protection of Traditional Knowledge through Geographical Indications, The IP Law Post *available at*: <https://iplawpost.wordpress.com/2020/09/12/protection-of-traditional-knowledge-through-geographical-indications/> (last visited on May 22, 2024).

out of which it gets its name. This diversity is defined by the regions in which it is cultivated and characteristics of this region such as soil, water, humidity, temperature, etc., make it unique.

The manufacturers in Europe have gained a lot as they have made fortunes in products with a Geographical Indication label, mostly in industrialized countries. Harris Tweed, Champagne, Feta cheese, and Scotch whisky are some of the most popular Geographical Indications. Geographical Indications can be registered on items that are made locally by the residents using their own resources and experience as in, e.g. handicrafts, textile, traditional foods and medicines.⁴

Established Geographical Indication of origin (possessing a particular quality) can contribute to or maintain market value by increasing prices, or by offering a competitive advantage to goods that have gained goodwill due to their provenance.⁵ The other top concern is to protect these "biocultural products" against free-riders and unethical business practices which aim at taking advantage of their huge economic potential.⁶

1. The Geographical Indications Introduction

Geographical Indications of goods refer to products that entail an indication assigning the name of a nation or place to the product. Such a name is usually synonymous with a stamp of excellence and uniqueness because of its reputation in that particular geographical area, region, or country. Geographical Indication is an Intellectual Property Right (IPR) approved under Article 1(2) and Article 10 of the Paris Convention on the Protection of Industrial Property. They also fall under the provisions of Articles 22 to 24 of the Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS), which was included in the agreements that replaced the General Agreement on Tariffs and Trade (GATT) after the Uruguay Round.

1.1. Historical Background

The Uruguay Round of GATT negotiations began in 1986, which was a transitional year in the development of the policy making in India. By the time India presented its big package of economic reforms in 1991, the Uruguay Round discussions were already well developed, and this shows that the change of policy was rapid and led to the establishment of the Marrakesh Treaty in 1994 and the creation of the WTO. India had a long history of inward-looking economic policy and an autarkic trade policy, as a note-taker and a low profile player in the early years of the Uruguay Round negotiations.⁷

⁴ Ruchi Pant, "Protecting and Promoting Traditional Knowledge in India: What Role for Geographical Indications", IIED Working Paper 8 (2015).

⁵ *Ibid.*

⁶ *Ibid.*

⁷ Doha Declaration framework established the basis for these discussions.

In Doha, however, India wanted more goods to be included in the protection of Geographical Indications not merely the wines and spirits. This caused most countries to feel discriminated upon and therefore they were convinced to convince others that different things needed to be given a long time protection as they could market better when they differentiate their products better. Not every participant concurred and this was the most critical issue of the discussions developed by the Doha Declaration.⁸

The argument that was made by the opponents of this expansion was that the level of protection that was being offered by Article 22 was sufficient. They gave cautions that additional protection would be very expensive and could disrupt already legal marketing strategies. India and other like-minded countries lobbied for an extension of the sphere of Article 23 to cover all categories of commodities. But other countries like the US, Australia, New Zealand, Canada, Argentina, Chile, Guatemala and Uruguay were categorical to stop any such extension.⁹ The extension problem was one of the major problems of the Doha Work Programme (2001). However, there has been minimal development in terms of discourse, and the issue is still included among the open issues of implementation since there are acute differences in the views of the members of the WTO.¹⁰

1.2. The Geographical Indications Act of India

The TRIPS Agreement places the obligation on member countries of WTO to offer legislative solutions to prevent deceitful or illegal action within the market concerning the proclaimed geographical origin of goods. To enjoy the protection of the GI laws in other countries, a product has to be acknowledged as a Geographical Indication (GI) in its country of origin. WTO global trade regime gives Geographical Indications a special status as a protection mechanism of IPR by incorporating it in the TRIPS. This appreciation opens up newer possibilities of socio-economic development of the marginalized populations, which are the last to enjoy the national economic growth.¹¹

By passing the Geographical Indications of Goods (Registration and Protection) Act, 1999, India complied with its international commitments under TRIPS. After the Geographical Indications Rules were announced in 2002, the Act became operative in September 2003. Geographical Indications of goods in relation to goods The Act defines Geographical Indications in relation to goods as an indication that goods are of agricultural, natural or manufactured origin in a territory, region, or locality in which a particular quality, a reputation or other characteristic of goods is essentially attributable to its geographical origin. With manufactured goods, any one of the activities, production, processing, or preparation, must occur in that territory. .¹²

⁸ *Ibid*

⁹ *Supra* note 4, at 14

¹⁰ *Id.* at 14-15.

¹¹ *Supra* note 4, at 15.

¹² Section 3(1) and 6(1) of the GI Act; *Supra* note 8

The legislature formed the “GI Registry to help with registration. The Registry must have a list of GIs registered in India, with the names and addresses of the proprietors and authorized users. According to the Act, any association of individuals, producers, organizations or authorities organized to represent the interests of producers may request to be registered in writing by the Registrar. Hence, small-scale farmers have to become an association or society to request a GI.¹³

1.3. Registration of Geographical Indication in India

The Act provides that no person shall have the capacity to initiate proceedings to avert or seek compensation to the infringement of an unregistered Geographical Indication, which makes registration all but necessary but technically optional. Infringement remedies can be legally availed to a registered owner and authorized users. Section 3(1) makes the Controller-General of Patents, Designs and Trade Marks the Registrar of GIs and the GI Registry of all Indian jurisdictions is located at Chennai. Moreover, Section 6(1) provides that there should be a GI Register, which should be separated into Part A (registration details of GIs) and Part B (details of authorized users).¹⁴

All commodities that constitute a category of goods specified by the Registrar can be registered. The Registrar categorizes items in compliance with the International Classification of Goods (Section 8).¹⁵ One application may be filed in several classes, each with a fee. GI registration life is 10 years and may be renewed in periods. Indian law has no assignment, transmission, licensing, pledge, or mortgage of registered GIs.¹⁶

2. Protection of Traditional Knowledge

Historically, knowledge used to be considered a symbol of respect and dignity. As the economy became more knowledge-oriented, however, it has gained another connotation — knowledge became perceived as property and something that could have economic value. The future of any country will depend not only on its inventions and innovations but also on its time-tested Traditional Knowledge and practices that have been developed through centuries by indigenous peoples.¹⁷

Indigenous people tend to inhabit ecologically rich areas that contain plenty of natural resources. These people know about certain properties of plants that are not documented; moreover, they know about certain biological substances that plants contain which are useful for treating certain diseases. Today,

¹³ Section 8 of the Geographical Indications Act

¹⁴ *Ibid*

¹⁵ Mayuri Gogoi & Ipsita Kaushik, “Protection of Traditional Knowledge in the State of Assam and Role of Geographical Indication,” 2 *International Journal of Recent Advances in Multidisciplinary Topics* 35 (2021).

¹⁶ *Ibid*

¹⁷ *Supra* note 17, at 35.

pharmaceutical companies have realized the value of TK, as it enables them to conduct research more efficiently.¹⁸

Medicinal plants are in increasing demand due to the fact that they are not narcotic, non-toxic, and inexpensive. Therefore, the knowledge of what use plants and fruits can be put to is economically profitable. On the other hand, indigenous communities see TK as merely an intrinsic part of their culture, not as something they can use to develop economically.¹⁹

2.1. Criteria to Qualify as Traditional Knowledge

Traditional Knowledge refers to information that has been developed through convention over centuries. Traditional Knowledge consists of the development or improvement of means of production according to societal requirements. These improvements are the basis of traditional knowledge for future generations.²⁰

Important characteristics of TK are:

- a. Invention of a new process to meet a requirement.
- b. Transmission of the process through generations by way of customs and traditions.
- c. Confine the knowledge to the community because of common values.

A typical case study is the Neem tree, which has been employed for hundreds of years in India for farming, medical applications, personal hygiene, and cosmetics, as indicated in manuscripts dating back over two thousand years. Another is Turmeric, which has been mentioned since time immemorial in medicinal and cosmetic uses.²¹

2.2. Reasons to Protect Traditional Knowledge

- **Equity:** Many TK security mechanisms operate on principles of equity. Existing processes rarely recognize the contribution TK makes in value generation. Securing TK would bring equity to situations like those of the traditional farmers involved in "inherited resources" through seed selection and trade.²²

¹⁸ Riya, "Protection of Traditional Knowledge under Intellectual Property Rights Regime," 01 E-Journal of Academic Innovation and Research in Intellectual Property Assets 151 (2020).

¹⁹ *Ibid.*

²⁰ *Ibid.*

²¹ *Supra* note 20, at 154.

²² *Ibid.*

- **Conservation:** Agricultural biological diversity conservation serves the interests of the international community. IPRs may generate revenues to ensure continued practice of traditional agriculture techniques that are likely to be replaced by high yielding varieties.²³
- **Preservation of Traditional Cultural Expressions:** TK forms part of our cultural heritage and right to self-identification. Language and civilization loss constitute tragedies similar to biodiversity loss.²⁴
- **Biopiracy:** Benefit sharing and preventing "bio-piracy" form the main protection objectives. India argued that any patent that conflicts with the CBD should not be approved. Improved patent office data management could eliminate the issue of approving patents over TK.²⁵
- **Sustaining usage and growth:** The protection of TK from misappropriation may encourage its use. Encouraging development of TK is the main justification since TK represents an underutilized resource in the developmental process.²⁶

2.3. Approaches for the Protection of Traditional Knowledge

Protection can be achieved through Constructive and Defensive means:

2.3.1. Constructive Protection

This empowers TK owners to sue for misappropriation. These provisions include:

- a) Quality certification and endorsement of TK systems.
- b) Openness to the objectives of TK owners.
- c) Avoidance of improper application.
- d) Strengthening of traditional institutions.
- e) Equitable profit distribution.²⁷

2.3.2. Defensive Protection

These provisions prevent third parties from obtaining IPRs of TK. They include:

- a) Recognition of TK as prior art.
- b) Access by search authorities to TK databases.²⁸

²³ *Id.* at 154.

²⁴ *Ibid.*

²⁵ *Supra* note 20, at 151-152.

²⁶ *Ibid.*

²⁷ *Id.* at 162-163.

²⁸ *Ibid.*

2.4. Some Initiatives taken to Protect Traditional Knowledge

- **Beej Bachao Andolan:** This is a campaign launched by Kalpavriksh in 1995 to document local seeds and their conservation techniques in the Tehri Garhwal region.²⁹
- **Honeybee Network:** It was established by Ahmedabad based organization (SRISTI) as a database to protect the rights and ensure fair rewards of innovations done by the grass root innovators.³⁰
- **National Innovation Fund (NIF):** Established in 2000 by Department of Science & Technology, it provides institutional support for grass root technology, which involves protection and up-scaling of outstanding TK.³¹

3. Traditional Knowledge and Geographical Indications

GI protection is intrinsically related to IPR. Geographical indications protect two types of properties, namely: copyright (covering cultural expressions) and industrial property (trademarks and design). GI protection is mainly associated with "place of origin." It protects the name, reputation and quality associated with this origin.³²

Indigenous communities are constrained by such issues as structural inequalities, historical wrongs, difficulties in integrating customary practices into existing law.³³ Biopiracy is another major concern where the TK has been exploited by third parties without the requisite permission or remuneration.³⁴ Moreover, lack of official recognition under existing IP systems leaves oral history and TK manifestations open.³⁵ Furthermore, many communities lack financial and institutional support needed to mount campaigns for their rights.³⁶

TK constitutes an asset that requires positive and defensive protection. Defensive protection denies the parties other than the owner any right to IPRs of discoveries made through TK use. Defensive measures used include "prior informed consent" and "disclosure of provenance."³⁷ On the other hand, positive protection enables the holder to take legal action against misappropriation of TK.³⁸

²⁹ *Supra* note 20, at 162-163.

³⁰ Aditya Maurya, Geographical Indications and Intellectual Property Rights in India: A Nexus of Tradition and Sustainability, LSI E-Journal 1 (2000).

³¹ Simran Kaur Khalsa, IP and Indigenous Communities: Protecting Traditional Knowledge and Cultural Heritage, Mondaq (2024).

³² *Supra* note 33.

³³ *Ibid.*

³⁴ *Ibid.*

³⁵ *Supra* note 17, at 36.

³⁶ *Ibid.*

³⁷ *Ibid.*

³⁸ *Ibid.*

3.1. Inter-relation between Geographical Indications and Traditional Knowledge

GI is considered an effective measure of ensuring protection to TK as a custodian of eternal knowledge. Contrary to other forms of IPRs where rights are granted only to individuals, in GI, the exclusive right is granted to the entire population that lives in that particular area. GI is available in the public domain but not necessarily weak. GI confers a legal user with exclusive use of an indicative symbol.³⁹ GI offers hope since it cannot easily be transferred to any individual, therefore making it sustainable means of protecting traditional cultural expressions. However, GI protects against the misuse of labeled items and not the unique technology.⁴⁰

3.2. Importance of Protecting Traditional Knowledge

TK contains practices and cultural heritage that were accumulated over centuries. Its relevance lies in contributing towards environmental sustainability, health, and cultural identification.⁴¹ Traditional agricultural practices contribute significantly in protecting biodiversity and ecosystems, usually without the use of chemical fertilizers.⁴²

Traditional Knowledge is also relevant in global health matters. "WHO Global Report on Traditional and Complementary Medicine" 2019 refers to practices such as Ayurveda, Acupuncture, and Unani medicine as important part of global healthcare.⁴³ Approximately 40 percent of all pharmaceutical products including Aspirin and Artemisinin are developed on the basis of natural and traditional knowledge.⁴⁴ Loss of traditional knowledge results in cultural destruction, but protection makes indigenous people guardians of their knowledge.⁴⁵

4. Role of Geographical Indications Law in protecting Traditional Knowledge

According to Article 8(j) of Convention on Biological Diversity, many goods such as plant-derived medicines are derived from TK. Intellectual Property Systems provides means of stopping the exploitation of those ancient forms of creation.⁴⁶ GI law is essential, offering indirect protection that consists of establishing link between a particular commodity and its unique characteristics, which usually depend on the TK of locals.⁴⁷ In case of the Muga Silk of Assam, GI protects the weaving expertise

³⁹ *Ibid.*

⁴⁰ *Ibid.*

⁴¹ Dr. Marisella Ouma, Traditional Knowledge: the Challenges facing International Lawmakers, WIPO Magazine (2017).

⁴² Ma Nan, Yang Lun, et.al., The Significance of Traditional Culture for Agricultural Biodiversity-Experiences from GIAHS, BioOne Digital Library (2021).

⁴³ WHO Global Report on Traditional and Complementary Medicine (2019).

⁴⁴ WHO, Traditional Medicine has a long History of contributing to Conventional Medicine and continues to hold Promise (2023).

⁴⁵ *Ibid.*

⁴⁶ WIPO, Using Geographical Indications to Protect and Promote Culture (2021).

⁴⁷ WIPO, What is the relationship between TK and GIs? (FAQ).

passed for generations. By the time this paper is written, about 635 commodities in India received GI status starting with Darjeeling Tea.

4.1. Legal Framework for Geographical Indication

The act of 1999 prohibits any form of misuse and misrepresentation.⁴⁸ The applicant must demonstrate the uniqueness of a product with direct connection to its origin.⁴⁹ Furthermore, the legislation enables GIs to establish GI Producer Groups as well as Certification Bodies.⁵⁰ The fourth schedule of the Act defines various categories for 34 types of commodities according to international standards (Class 30 – tea & spices; Class 24 – textiles).⁵¹ The duration of registration of GI lasts 10 years but may be renewed later.⁵² GIs assure consumers of genuine products from which they can differentiate from fakes.⁵³ For manufacturers, GIs increase marketability and tourism opportunities.⁵⁴

4.2. Mechanisms for Protection under Geographical Indications Law

Protection may be requested either by a collective of producers or cooperatives.⁵⁵ Four main techniques are used:

- Sui generis.
- Certification or Collective Marks.
- Product Approval Schemes.
- Legislation on anti-competition.⁵⁶

Depending on the territory, those mechanisms may overlap.⁵⁷ There is no limitation on the number of authorized users who need to be real producers within that territory.⁵⁸ Any use of GI products with misleading information is illegal.⁵⁹ Infringement is defined as using GIs for suggesting a false origin of the product.⁶⁰ The penalty is provided under Sections 39 and 41 (imprisonment for up to 6 months or even 3 years; fines from INR 50,000 to INR 2,00,000).⁶¹

5. Impact of Geographical Indications Law on TK

⁴⁸ Ganesh Makam, Geographical Indications and Cultural Protection in India: Harnessing Intellectual Property for Regional Development, SSRN (2023).

⁴⁹ *Supra* note 48.

⁵⁰ *Ibid.*

⁵¹ *Supra* note 4, at 15

⁵² *Ibid.*

⁵³ *Ibid.*

⁵⁴ *Supra* note 48.

⁵⁵ WIPO, Why Geographical Indications matter to SMEs (Information Portal).

⁵⁶ WIPO, How are Geographical Indications Protected? (FAQ).

⁵⁷ *Supra* note 56.

⁵⁸ *Ibid.*

⁵⁹ *Supra* note 4, at 15

⁶⁰ *Ibid.*

⁶¹ *Ibid.*

Impact of GIs on cultural heritage is achieved through registration, which requires elaborated description of production. Thus, documentation is made accessible to upcoming generations. In addition, registering GIs brings economic advantages since items become more expensive. This gives rise to incentive for the younger generation to master TK, forming a sustainable model of knowledge transmission. Lastly, community management and self-respect among its members are facilitated through the creation of producer associations.

5.1. Economic Benefits

Economic impact of GIs on the local community is significant though financial assistance is necessary for the artisans.⁶² GIs grant independence for local producers, enabling them to build premium brands and increase job opportunities, thus preventing migration from villages to cities.⁶³ Promotion might positively affect tourism and regional gastronomy.⁶⁴ Successful application usually depends on professional workforce (like in Kanchipuram or Muga Silk).⁶⁵ GIs boost marketing potential for items produced in poor economic regions, raising prices and demand.⁶⁶

5.2. Cultural Preservation

GIs are seen as a safeguard against the duplication of unique goods such as Alphonso mangoes and Banarasi sarees in India.⁶⁷ Conservation protects against the loss of culture and creates a niche for unique goods, promoting community pride.⁶⁸ While GIs cannot provide protection to the underlying TK 'ability', they afford an indirect kind of protection through restrictions on labels placed on non-conforming goods.⁶⁹

6. Instances of Geographical Indication Law protecting Traditional Knowledge

India's Assam contains a treasure trove of TK. There has been a marked increase in income of producers and artisans with successful GI registrations, which has resulted in genetic resource conservation. In this research paper, three goods will be examined; a textile (Muga Silk), metal craft (Bell-Brass) and handicraft (Cane-Bamboo). The state of Assam is renowned for its tea, weaving and traditional metal industries.⁷⁰ Approximately 45 goods in Assam including Assam Orthodox Tea and Boka Chaul have received GI status.

⁶² Shruti Verma, The Economic Impact of Geographical Indications in Indian Communities, Aishwarya Sandeep (2023).

⁶³ *Ibid.*

⁶⁴ *Ibid.*

⁶⁵ *Ibid.*

⁶⁶ *Supra* note 62.

⁶⁷ *Ibid.*

⁶⁸ *Ibid.*

⁶⁹ WIPO, Intellectual Property and Traditional Handicrafts (2023).

⁷⁰ *Supra* note 17, at 36.

6.1. Muga Silk

Muga silk is among the rarest types of silk and is available only in Assam. The distinguishing factor is the goldish yellow color. The silkworm (*Antheraea assamensis*) is particularly vulnerable to pollution.⁷¹ Muga silk is one of the most organic fibers available.⁷² They are known to last longer than their wearers and develop a deeper golden color with age. It was granted GI status in 2007.⁷³ Sualkuchi, nicknamed the 'Manchester of Assam', is the center for Muga Silk production with almost all families engaged in handloom weaving of Muga silk. Muga silk constitutes 95 percent of global Muga silk production.⁷⁴

6.2. Bell-Brass Metal Industry

The bell-brass metal production of Assam has a long-standing tradition going back to the 7th Century A.D. Important sites include Sarthebari, Hajo and Raha.⁷⁵ Sarthebari is the central site for Bell-Brass situated close to Guwahati. Bell metal is an alloy of copper and tin. The metal is used for making utensils for religious and domestic purposes. Scrap metal is commonly recycled, making it a sustainable industry. Melting of the metals takes place in coal ovens and are pounded into required shapes.⁷⁶ For durability purposes, the metal articles are dipped in water and hand-polished.⁷⁷ It is one of the ancient skills.⁷⁸

6.3. Cane-Bamboo Handicrafts

Cane-bamboo crafts play a very important role in the Assamese society⁷⁹ and economy with origins dating back to the era of Bhaskara Varman.⁸⁰ Cane-bamboo is utilized in the construction of furniture, musical instruments, houses and domestic items. India ranks as the second largest producer of bamboo and 51 varieties of bamboo exist in Assam.⁸¹ The annual raw material worth Rs 4000 crores is obtained from it. Some of the notable varieties of bamboo include Bhaluka and Jati bamboo.⁸² Assam is renowned for its traditional musical instruments like flute and Gogona which are required during Bihu festivals.⁸³ Craftsmen manufacture dolls, toys and expensive cane furniture leading to economic development of the region.⁸⁴

⁷¹ *Id.* at 37.

⁷² *Ibid.*

⁷³ *Ibid.*

⁷⁴ *Ibid.*

⁷⁵ *Id.* at 38.

⁷⁶ *Ibid.*

⁷⁷ *Ibid.*

⁷⁸ *Id.* at 39.

⁷⁹ *Ibid.*

⁸⁰ *Ibid.*

⁸¹ *Ibid.*

⁸² *Ibid.*

⁸³ *Ibid.*

⁸⁴ *Ibid.*