

## *Zamindari Abolition Act 1950 and Delay of its Implementation*

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**Abstract:** From ancient times to the colonial period, the traditional rights of the peasants in the land, i.e. the right of possession of the land from generation to generation in return for payment of rent, were maintained. But the traditional rights of the peasants were extinguished when the state declared the zamindars as the owners and proprietors of the land under the Permanent Settlement of 1793. Although land reforms were carried out several times during the colonial period, the ownership and proprietorship of the land by the peasants was not established. Moreover, exploitation and oppression of the disenfranchised peasantry by the zamindars continued. The Zamindari Abolition Act was enacted in 1950 after the establishment of independent Pakistan at the end of colonial rule. In this Act, the Permanent Settlement was abolished and the peasant's right to land ownership and proprietorship was legally established. Due to the delay in the implementation of this act, the people were deprived of these benefits. This article will review the obstacles that arose in its implementation after the enactment of the Zamindari Abolition Act. Based on a qualitative methodology, data gathered from archival documents and other sources was used to write this paper. The historical research approach has been used to analyse the sources. It employs primary—such as government reports, assembly proceedings, newspapers, etc.—as well as secondary—such as books and scholarly articles. The paper concludes that because of the long time spent in implementing the Act due to the various obstacles and its impacts, mostly negative, on the state and society, an exploitation-free society dreamed by the people of East Bengal could not be established.

**Key Words:** Zamindari Abolition Act, Land Revenue Commission, East Bengal Provincial Legislative Council.

### **Introduction**

It is a common perception that the Zamindari Abolition Act was passed in 1950 and it was implemented in the same year. But the fact was that the Bill relating to this act was passed in the East Bengal Provincial Legislature on February 16, 1950 and came into force as a law from May 18, 1951. Acquisition of interests of zamindars and other rent-receivers under this act

was completed in 1958. The processes were finally completed in 1964 by compensating all rent-receivers including zamindars, *debottars*, *waqfs* and so on.<sup>1</sup> During these fourteen years, the implementation of the abolition of the Zamindari Act faced various obstacles. Scholars have discussed this issue separately while writing articles or books on other subjects. Badruddin Umar in his book *Permanent Settlement of Bangladesh Peasant* wrote that the Bill relating to this Act was introduced in April 1948 and became an Act in February 1950.<sup>2</sup> But the text mentioned nothing about when and how this Act was implemented. However, Kamal Siddiqui in his book titled *Land Reforms and Land Management in Bangladesh and West Bengal: A Comparative Study* remarked that,

By January 1957, the government, having won the case in both the High Court and the Supreme Court, was finally in a position to proceed with wholesale acquisition. This was completed by the middle of 1958.<sup>3</sup>

But he did not discuss the obstacles faced in the implementation of this Act and how the government overcame those obstacles. Kابدul Islam in his *Land Revenue System of Bangladesh 1947 to 2000*, dealt with land reforms, acquisition of ownership interests of middlemen or rent-receivers and payment of compensation, rate and method of compensation, determination of ceiling system, form of tenancy, and discussed in detail about land revenue, rent, and land development tax.<sup>4</sup> But he did not discuss when and how the Act was implemented and what were the hurdles faced in implementing the Act. T. Hussain in his book *Land Rights in Bangladesh: Problems of Management* discusses various issues but he did not include the obstacles that delayed the implementation process. However, he very briefly mentioned the case of zamindars in the Dhaka High Court and Supreme Court of Pakistan.<sup>5</sup> Shawkat Ali in his article entitled 'Land Reform Measures and Their Implementation in Bangladesh' very briefly mentioned the case of zamindars in Dhaka High Court and Supreme Court of Pakistan but did not explain it in

detail.<sup>6</sup> This research will examine the obstacles that delayed the implementation process of the Act. This article has been written on the basis of a qualitative approach, under which data collected from documents and other sources have been used. The sources have been analyzed following the historical research method. Following the historical method, it uses primary documents, e.g., Assembly Proceedings, Government Reports, newspapers, and secondary sources, e.g., books, scholarly articles, etc.

### **Background of the Zamindari Abolition Act**

One of the electoral promises of the Muslim League in the 1946 election was to abolish the zamindari system without compensation. The Muslim League won the election and formed the government. After the establishment of the independent state of Pakistan in 1947, there was intense pressure on the Muslim League government to enact and implement legislation to abolish the zamindari system, both from inside and outside the East Bengal Provincial Legislative Council. But as the Muslim League was a landlord-dominated political party, it adopted a slow-walk policy in introducing the Zamindari Abolition Act.

There was constant pressure on the government to abolish the zamindari system. In addition, due to the involvement of vote politics, the demands of the peasant community for the abolition of zamindari became highly important.<sup>7</sup> In this situation, on April 10, 1947, the government introduced a bill in the Bengal Provincial Legislature under the name 'Bengal State Acquisition and Tenancy Bill, 1947'. But the League Government did not proceed to pass the Bill in the Assembly on the pretext that it would not be possible to carry out the proceedings of the Legislative Council due to the preoccupation of the British rulers with the complicated plans of the transfer of power and partition of the country.

In this situation, the *Tebhaga* Movement on the one hand and the political leaders including the elected members on the

other, put tremendous pressure on the government to abolish the zamindari system. Considering the overall situation, a Bill named 'East Bengal State Acquisition and Tenancy Bill, 1948' was raised in the East Bengal Provincial Legislature on April 7, 1948. The Bill was referred to a Select Committee. Among the 45 members of this Select Committee, 20 were zamindars.<sup>8</sup> Although the Select Committee was formed, the Bill did not make any progress, mainly because the landlord-dominated Muslim League was maneuvering to protect the interests of the landlords. Then, the Muslim League government re-introduced the Bill in the East Bengal Provincial Legislative Council on December 13, 1949.<sup>9</sup>

After re-introducing the Bill in the Provincial Legislative Assembly, the members of the Assembly participated in the discussion and engaged in heated arguments for and against the abolition of the zamindari system. The intention of the zamindar-influenced Congress members who opposed the abolition of the zamindari system argued, firstly, to maintain the zamindari system at any cost and secondly, to try their best to obtain additional privileges for the zamindars if they ultimately failed to preserve the zamindari system. They argued that the acquisition of zamindari would not be possible, as it would create many complications. It will also not be possible to formulate a policy for determining compensation. They were of the opinion that at first the rules and procedures for the gradual acquisition of zamindari and compensation should be formulated, and then this legislative initiative should be taken. They also argued that the implementation of the legislation enacted through this bill would make it difficult for low-income rent-receivers to survive in society. The land under the control of the zamindar was his personal property. The Congress members requested the government to provide adequate compensation to the zamindars. The basis of their statement was, firstly, that all rent-receivers were not zamindars, so there was no need for a zamindari abolition law. Secondly, the proposed legislation would increase compensation. They requested the government to increase the

proposed compensation for the property acquired by the zamindars.<sup>10</sup> It was evident from their statement that the main objective of the zamindar-influenced Congress party members was to protect the interests of the zamindars.

The members of the Legislative Council, who were in favor of the abolition of the zamindari system, argued that the Bill should be passed to abolish the zamindari without compensation as per the election promise. However, some of the ruling party's Muslim zamindar-influenced members were in favor of paying compensation for the abolition of the zamindari. They were of the opinion that the acquisition of land of zamindars or jotedars without compensation would be unfair. Some of them advised the government to acquire land with a small compensation for more crop production and distributing the acquired land among the landless tenants.<sup>11</sup> That was, firstly, they supported the abolition of the zamindari system and by acquiring the zamindari with a small compensation and distributing the land among the landless people. After a long discussion, the East Bengal State Acquisition and Tenancy Bill was passed by the East Bengal Provincial Legislature on February 16, 1950.<sup>12</sup> Through a long legal process, the Bill became the East Bengal State Acquisition and Tenancy Act, 1950 or the Zamindari Abolition Act, and the Act came into effect on May 18, 1951.<sup>13</sup>

**Obstacles in Implementation of the Zamindari Abolition Act:** The Zamindari Abolition Act was not implemented till 1964. Various obstacles arose in this process and could not be overcome quickly. These were:

### **The Muslim League Government's Slow-moving Policy**

It took a long time to enact legislation abolishing the zamindari system due to the Muslim League government's policy. The government adopted a slow-moving policy in the implementation of this law. After the Zamindari Abolition Act was enacted, the government did not take any initiative to implement it for a long time. Although the Bill to abolish zamindari was passed in the

East Bengal Provincial Legislature in February 1950, the consent of the Governor General was not received until March 1951. Basically, it was difficult to implement the Zamindari Abolition Act during the Muslim League government. On March 10, 1951, Mother Box, a member of the East Bengal Provincial Legislature, remarked:

The zamindari system would be abolished, but a long time has since been passed, we have taken no action as yet. This delay has made the people question the *bona fide* of our government. Really if we mean business, we should have abolished zamindari long ago. But I do not know what is standing in the way of the government in the execution of this scheme when we find that proprietors after proprietors are coming with prayers for surrendering their estates to the government for management by the Court of Wards. If there is any *bona fide* intention of the government regarding the abolition of zamindari, the government should have availed of this opportunity for taking all these estates under the management of the Court of Wards. Moreover, besides acquisition, this abolition requires some sort of set-up in the official administration. We find nothing in this respect. I would submit that such action on the part of the Government has really led the people to question the *bona fide* of the Government regarding the abolition of the Zamindari.<sup>14</sup>

### **Litigation Moved by the Zaminders**

With the fall of the East Bengal Muslim League government after the election of 1954, the newly formed United Front Government took initiatives to implement the Act quickly. Due to the case of the zamindars of East Bengal, the government could not implement the Act. On April 2, 1956, when the East Bengal government published a gazette notice to acquire the zamindari, the zamindar of Muktagachha *Aat Ani Raj Estate* in Mymensingh<sup>15</sup> and 83 other zamindars filed a writ petition in the Dhaka High Court challenging the validity of the Zamindari Acquisition Act and the amendment ordinances of 1956. In this writ suit, the government sought a direction to quash the

Gazette Notification of April 2, 1956 and stay in possession of the zamindari till the final disposal of the suit. On April 13, 1956, the hearing of the writ case filed by 84 zamindars began in the Dhaka High Court. In the hearing, Barrister Siddharth Roy, who came from Kolkata on behalf of the petitioner zamindars, said that according to the system of governance of Pakistan, a 'Writ of Mandamus' should be issued with the order to cancel the notification published in the Additional Dhaka Gazette on April 2, 1956, regarding the ownership of zamindari rent and occupation of *khasmahal* lands because the East Bengal State Acquisition and Tenancy Act of 1950 is against Article 5 of the Fundamental Rights Chapter of the Constitution of Pakistan enacted in 1956. The article states that all citizens are equal in the eyes of the law and are entitled to equal protection under the law. The lawyer argued that a law that differentiates one citizen from another was against the rule of law. On the other hand, Dhaka's prominent lawyer, Advocate B. A. Siddiqui filed 14 more petitions in court challenging the validity of the notification dated April 2, 1956, on the above grounds and additional grounds against encroachment of the *waqf* estate. Showing the same argument, Barrister Abu Sayeed Chowdhury filed more than 50 petitions in court, raising the validity of the said provincial government circular. Barrister Chowdhury argued on behalf of several waqf estates that acquiring *waqf* property by the government was illegal under Article XVIII of the Fundamental Rights of the Constitution of Pakistan.<sup>16</sup>

After the hearing, on April 24, 1956, a double bench consisting of Chief Justice Amin Uddin Ahmed and Justice Hasan of the Dhaka High Court issued an interim injunction to prevent the government from acquiring the rent-collecting rights and special lands of the zamindari in accordance with the notifications of the provincial government on April 2 and 13, 1956, and the case was dismissed. The bench issued a ruling directing the provincial government, the Finance Secretary and Revenue Department (Land Revenue Branch) to show cause within 21 days as to why a 'writ of mandamus' should be issued

to quash the zamindari acquisition notification published in the Additional Dhaka Gazette. In this situation, on April 13, 1956, following the order of the High Court, the previously announced radio speech of the Minister of Land Acquisition Department was cancelled.<sup>17</sup> On April 14, 1956, the Chief Minister of East Bengal told reporters that as per the government's notification dated 2 April 1956, Dhaka High Court 1956, although the order issued on April 13 did not reach the hands of the East Bengal government, the government decided to stop the acquisition of zamindari in East Bengal. On June 11, 1956, the hearing of the zamindari writ started in the special bench consisting of Chief Justice Amin Uddin Ahmed, Justice Ispahani and Justice Hamudur Rahman. It should be noted that on April 13, 1956, the provincial government stopped taking ownership and occupying *khas* land due to an interim injunction of the Dhaka High Court on the application of the landlords.<sup>18</sup>

### **Constitutional Barriers**

About 100 zamindars filed a writ petition in the Dhaka High Court on April 13, 1956, challenging the validity of the provincial government's zamindari acquisition notice. Advocate General S.N. Baker, the famous British Mr. D.N. Preet, former law minister of Pakistan A.K. Brohi presented arguments on behalf of the provincial government. On the other hand, the eminent advocate of Patna High Court Shri P. R. Das (brother of *Deshbandhu* Chitta Ranjan Das), Barrister Shri Ashok Sen of Calcutta High Court, Barrister Siddharth Roy, Barrister Abu Sayeed Chowdhury and Barrister B.A. Siddiqui of Dhaka High Court. Shri P.R. Das argued on behalf of the zamindars that the Zamindari Abolition Act was anti-establishment and offensive. He placed the following explanations to validate his point:<sup>19</sup> (a) this act provides for the confiscation of property but not in the public interest which can be called a fraud direct, and (b) the Act was contrary to Article 5 of the Constitution. This article states that all citizens were equal in the eyes of the law and all were entitled to be protected by the law. On



February 29, 1956, the repealed Acts were declared valid. But it did not apply to Article 5 of the Constitution. It was not possible to do anything contrary to Article 5 of the Constitution.

In this connection, Shri Das further said that this act could have been saved by amending this article in the presence of two-thirds of the members of the council. Sections 3 and 37 of the Zamindari Acquisition Act were repugnant to Article 5 of the Constitution. Section 3 of this act was anti-constitutional for two reasons - (i) it has the power for the government to issue notices of acquisition of zamindari to any zamindar at will and indiscriminately, and (ii) there was scope for taking discriminatory measures also on the question of time in issuing such notices by the government. Das explained the matter in more detail and said that if the government so desired, it could issue a notice of acquisition of middle title and possession of *khas* land to one person in 1951 and another in 1956. As a result, the latter could easily enjoy the property rights for five years. But the previous person would be deprived in this regard. The government also had the power not to give any notice to the latter under this section. Therefore, it is clearly proved to be biased towards the interests of the said persons. It is prohibited in Article 5 of the Constitution. The experienced lawyer referred to two judgments of the Supreme Court of the United States- the Chinese Laundry Case and the Baltimore Case. These two cases were mentioned only to prove that it was wrong for the council to grant the authority a law that was blatant and favoritist. But Section 3 of the said Act has scope for this and the said section did not mention how the authority would work. He explained specifically about Section 37 of the Zamindari Abolition Act and said that this section mentions 8 types of compensation. But it was contrary to the idea of equal rights for all in the eyes of the law mentioned in the regime.<sup>20</sup>

In this context, he referred to the issue of the Land Reforms Act of Uttar Pradesh, India. He said that the Uttar Pradesh Land Reforms Act provides for equitable compensation and it was 8 times the value of the encroached land. Additionally, the act also provides for rehabilitation allowances for landlords. Shri Das further said that although the law does not provide any prohibition in favor of class division in any case, in the case of

such class division, there must be good reasons consistent with the main objective of the law. This distinction could be accommodated if compensation was provided based on the value of the land and the size of the holding. According to Section 37 of the Act, the difference in compensation based on the net income of the individual could not be valid.<sup>21</sup>

The Act was not justified as it provides for the encroachment of *waqf* estates. According to Article 18 of the Constitution, read with Article 25 on Directive Principles of the Constitution, the government was bound to protect *waqfs* and other religious institutions. However, the zamindari act has provided for the eviction of all these institutions. According to him, all *waqf* properties belong to the creator of the world. Therefore, according to the Zamindari Abolition Act, although it was possible to take possession of people's property, the creator who owns the *waqf* property could not be classified as the owner. According to the constitution, the citizens of the country could manage the places of worship and institutions according to their religious beliefs. In view of the above situation, possession of *waqf* property was against the constitution.<sup>22</sup>

Barrister Ashok Sen presented the statement on behalf of the other six petitioners. Mr. Sen criticized Provincial Government Ordinance No. 3 of 1956. This ordinance ordered the provincial government to take over the rest of the zamindaris.<sup>23</sup> He stated that the Ordinance No. 3 of the Provincial Government on March 22, 1956, was not properly promulgated because the permission of the Governor General was not taken earlier for this. He said that this ordinance was against the rule of law. Because whatever the ordinance was, it must be consistent with the constitution.<sup>24</sup>

### **Appeal against the Verdict of the High Court**

From June 11 to June 22, 1956, the hearing of the East Bengal zamindari acquisition writ lasted for 10 days. After the hearing, the Dhaka High Court verdict was suspended. On August 7, 1956, the Special Bench of the Dhaka High Court gave its verdict on the famous Zamindari Abolition writ. Chief Justice

Amin Uddin Ahmed read out the 173-page verdict for five hours. The High Court declared the Zamindari Abolition Act and subsequently the Governor's amending ordinances valid. The other petitions against government notices regarding *khas* land included in *Waqf*<sup>25</sup> and *Devottar*<sup>26</sup> properties, the Special Bench declared the above notice regarding possession of *khas* land null and void. The judgment directed the government to release the *khas* lands of *devottar* and *waqf* estates. The court stated that the government could legally take over all other properties except the *khas* land of *devottar* and *waqf* estates.<sup>27</sup>

The zamindars applied to the Dhaka High Court to suspend possession of the zamindari for another two weeks. The judges dismissed their appeal but allowed them to appeal to the Supreme Court of Pakistan. It was said that through the Zamindari Abolition Act, the government has established the rights of the subjects by taking over the zamindari and eliminating the middleman. After the judgment in the zamindari usurpation case on 7 August, 1956, the Minister of Revenue and Zamindari Expropriation Department of East Pakistan announced that the notification issued by the government on 2 April, 1956, for taking over the whole zamindari of the province would come into effect immediately after the publication of the judgment.<sup>28</sup> On August 9, 1956, the zamindars filed several petitions in the Special Bench of the Dhaka High Court to stop the government from acquiring the right to collect rent. That is, the notice that was given on April 2, 1956, by abolishing the mediation of the province, to order the provincial government to refrain from acting accordingly, the lawyers N. C. Nandi and Abu Sayeed Chowdhury submitted an application on behalf of 65 zamindars.<sup>29</sup> Then on August 15, 1956, the Dhaka High Court issued an order to the provincial government to refrain from accepting all types of rent-receiver rights until October 25, 1956, under the East Bengal Land Acquisition and Tenancy Ordinance. The court issued the above 'Set Order' as per the petition filed by the zamindar seeking time to appeal to the Supreme Court.<sup>30</sup>

### **Appeal to the Supreme Court**

On January 17, 1957, the Full Bench of the Supreme Court of Pakistan rejected all appeals challenging the validity of the Zamindari Abolition Act. All these petitions sought the annulment of various notifications issued by the Government of East Pakistan for usurpation of rent-receivers rights. All appeals were dismissed by the Full Bench of the Supreme Court. This judgment dismissed all appeals challenging the legality of zamindari acquisition and thereby removed the last obstacle to the government acquisition of zamindari.<sup>31</sup> An editorial published in the *Daily Ittefaq* dated January 19, 1957, titled 'Zamindari Occupation' stated that this judgment removed all legal restrictions on the Zamindari Abolition Act. The entire country greeted this verdict with joy. The fate of the crores of countrymen was intertwined with this. The feudal land distribution system was the biggest obstacle to the economic progress of agrarian East Pakistan. Ownership of land by a handful of individuals and unlimited exploitation over the peasants impoverished the entire country. The zamindari system was responsible for all the miseries of the masses. The people of the country hoped that this judgment will put an end to it and the socio-economic development of the country will accelerate.<sup>32</sup>

Zaminders again appealed against the judgment to the Supreme Court dated May 12, 1959, protesting the issuance of the *Waqf* property acquire order of the East Bengal government.<sup>33</sup> Hearing of this appeal was held with full bench of the Supreme Court of Pakistan. The bench was formed by Chief Justice Mohammad Munir, Justice Shahabuddin, Justice A. R. Cornelius, Justice Amir Uddin Ahmed, Justice Mohammad Sharif and Justice S. A. Rahman. At the end of hearing, the bench delivered the final judgment on this appeal on July 9, 1959. Justice Shahabuddin and Justice S. A. Rahman agreed with Chief Justice Mohammad Munir's written judgment. Justice A.R. Cornelius and Justice Amir Uddin Ahmed dissented with the Chief Justice in separate

judgments. As a result, the Supreme Court allowed the government's appeal against the order of the High Court in the said case on the basis of a majority.<sup>34</sup> Consequently, the appeal of the *mutawallis* of the *waqf* property was dismissed and the government was entitled to take possession of the *waqf* property.

### **Final Judgement and Difficulties Regarding Compensation**

On March 22, 1956, the government was entrusted with the responsibility of collecting all the previous rents and cesses of the acquired zamindaris. The government announced that ex-rent-receivers would recover the arrears of tax from their ex-tenants through compromise or civil courts. The ex-rent-receivers can recover the remaining rent from their ex-tenants through compromise or civil court. As per Section 68 (E) of the Zamindari Abolition Act, 24 months were granted to the concerned from the date of possession of the Zamindari to collect the corresponding dues or to effectuate the decree. Later, it was claimed that the government was not able to take full advantage of the Act due to the delay in its implementation and in fact they got only a few months to file the tax collection charges in the courts. In view of these difficulties, an Ordinance was issued amending Section 68 (E) of the Act and again giving 24 months. This Ordinance was published on July 27, 1959, in the Additional Dhaka Gazette. An official press note issued on August 11, 1959, said that the attention of former rent-receivers was being drawn to the Ordinance to enable them to take full advantage of this extension of time for the recovery of pre-occupation rent arrears of zamindari occupied after March 22, 1956. All were informed in the official press note about the responsibility for arrears from the pre-zamindari occupation period.<sup>35</sup>

It should be noted that the compensation for the acquisition of zamindari in East Pakistan was fixed at Rs 36,34,01,111. Out of this, the dues of domestic zamindars and middlemen were Rs 26,40,77,226 and the dues of non-resident (foreign, especially resident in India) zamindars and middlemen were Rs

9,93,23,885. A total compensation list of 35 lakh landlords and middlemen was prepared. Native landlords and middlemen were paid cash compensation for a period of five years starting in 1963. Non-resident landlords and middlemen were provided with compensation in the form of non-transferable bonds in annual installments for a period of 40 years. Interest was also provided at a rate of 3% per annum. In 1962-63 the compensation list and annual scholarship list were finally prepared and published in the official gazette. The list was handed over to the concerned District Commissioner. The final acquisition of all types of land was completed in 1964.<sup>36</sup> Thus, it took a long time to implement the Act, mainly due to politics and litigation.

### **Conclusion**

The benefits of the Zamindari Abolition Act have not been realized due to the delay in the formulation and implementation of the Act. Various obstacles can be attributed to this. The most important of these obstacles was the lawsuit filed by the zamindars. The slow-moving policy of the Muslim League government in East Bengal can also be blamed for this. After overcoming these obstacles, the government of East Bengal was finally able to implement the Act in 1964, but during this period it had various effects on the society and the state. Finally, the people of East Bengal though dreamed that an exploitation-free society would be established after the abolition of the zamindari system, it had not been materialized because of the long time spent in implementation process.

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15. The zamindar of Muktagachha Eight Ani Raj Estate in Mymensingh was Shri Jivendra Kishore Acharya Chowdhury.
16. *The Daily Ittefaq*, 14 April 1956.
17. *The Daily Ittefaq*, 14 April 1956.
18. *The Daily Ittefaq*, 15 April 1956.
19. *The Daily Ittefaq*, 15 April 1956.
20. *The Daily Ittefaq*, 12 June 1956.
21. *The Daily Ittefaq*, 12 June 1956.
22. *The Daily Ittefaq*, 13 June 1956.
23. *The Daily Ittefaq*, 13 June 1956.

24. *The Daily Ittefaq*, 14 June 1956.
25. Donation of land to an institution or individual for religious purposes is called *Waqf*. There are two types of *Waqf* namely (i) *Waqf Lillah*—Property donated to religious institutions for the purpose of worshiping Allah, and (ii) *Waqf Awlad*—Endowments made for the benefit of legitimate heirs.
26. The barren land donated by institutions or individuals engaged in Hindu religious work is called *Devattar*.
27. *The Daily Ittefaq*, 8 August 1956.
28. *The Daily Azad*, 8 August 1956.
29. *The Daily Ittefaq*, 10 August 1956; *the Daily Azad*, 10 August 1956.
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