

Gendered Labour Governance and Unequal Rights in Tea Plantations: Evidence from Golaghat, Assam

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Abstract

Women's labour in Assam's tea plantations is embedded within a system where statutory rights exist formally but are selectively realised through conditional, segmented, and discretionary labour governance. Drawing on qualitative research in Golaghat district, this paper examines how gendered inequalities are produced and sustained through everyday plantation work regimes rather than through absence of legislation alone. Based on in-depth interviews with sixteen women workers, participant observation, and discussions with estate authorities, the study analyses the gap between the Plantations Labour Act, 1951 and workers' lived realities. Findings show that entitlements related to wages, maternity benefits, sickness leave, sanitation, and work-related essentials are not uniformly accessible but mediated by employment status (permanent/temporary), managerial discretion, and weak enforcement structures.

The paper reconceptualises feminisation of labour as an ongoing process of labour governance characterised by normalised precarity, conditional access to welfare, and everyday disciplinary practices within plantation hierarchies. It demonstrates that women workers' marginalisation is reproduced not only through economic exploitation but also through systematic regulation of access to rights, bodily needs, and collective representation.

By foregrounding how inequality is actively produced rather than merely experienced, the study contributes to feminist labour scholarship by revealing contemporary mechanisms through which plantation economies sustain gendered subordination despite formal legal protections.

Introduction

Assam is a key contributor to India's tea industry, producing over half of the country's total tea and supporting a large plantation workforce. The state's tea gardens are internationally recognised for their economic importance, playing a significant role in national exports and sustaining regional livelihoods.

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Within this plantation economy, women form the core of the labour force and are indispensable to the production process (Khatoniar & Das, 2025). Plantation commodities such as tea rely heavily on women's labour, particularly in labour-intensive tasks, making women central to sustaining productivity (Rasaily, 2014). In Assam, approximately one million women are employed in tea gardens, constituting nearly half of the plantation workforce (Borthakur, 2023; IDH, 2020). Their concentration in activities such as tea plucking is shaped by gendered assumptions that associate women with dexterity, patience, and precision. This gendered organisation of work serves both production efficiency and the reproduction of a stable labour force. At the same time, women tea plantation workers are frequently showcased in visual representations and state narratives as emblematic figures of the industry. However, this symbolic visibility contrasts sharply with the structural conditions governing their labour, highlighting the need for a sustained gendered and political-economic analysis of women's work in Assam's tea plantations.

From a feminist perspective, the discourse on gender and labour in tea plantations raises critical questions about the intersections of public and private spheres, production and reproduction, and the so-called "triple burden" carried by women. Scholars emphasise that plantation ideology continues to systematically oppress workers, with women disproportionately bearing the brunt of hierarchical and exploitative labour practices (Baruah, 2018; Patel, 2020). Besky (2014) critiques the plantation economy by interrogating "three parallel visions of justice"—justice as property, justice as fairness, and justice as sovereignty—highlighting the alienation of female workers and the persistent injustices they face. The gendered division of labour reinforces a social hierarchy in which women are confined to the lowest and most expendable positions, often treated as a cheap and abundant labour force rather than recognised as skilled or specialised contributors (Gurung & Mukherjee, 2018). This theoretical and empirical framing underscores the structural marginalisation and feminisation of labour that define the Assam tea plantation industry, providing a critical foundation for analysing not only continuity but also the evolving forms through which women workers' subordination is reproduced.

Global scholarship on women and labour highlights that women's work is often excluded from national income statistics, implying that a substantial portion of their labour remains unremunerated and unaccounted for in GDP calculations (Chakraborty, 2022). Women's contributions are particularly undervalued economically due to narrow definitions of what constitutes "productive" or "market-oriented" activities. According to the Census of India (2011), 'work' is defined as any activity that is productive and compensated, and a 'worker' is a person primarily engaged in such work. Individuals who work for the majority of the reference year are categorised as 'main workers,' while those engaged for only a limited portion of the year are considered 'marginal workers.' Similarly, the NSSO classifies a person as a worker if she or he is involved in any economically gainful activity, including tasks such as animal care, fodder collection, and food preparation—activities predominantly undertaken by women (Mondal, 2022). Consequently, in discussions on women and labour, a critical question arises: what is

recognised as work, and whose labour is counted as economically productive (Ekka, 2022). This issue underscores the structural invisibility of women's labour, a key dimension of feminisation theory, and is directly relevant to understanding both the persistence and institutional normalisation of women's marginalisation in Assam's tea plantations.

Based on the aforesaid, the present study was designed to examine the challenges faced by women workers in the tea plantations of Golaghat, with a focus on understanding their working conditions and experiences of gender-based discrimination. The study aims to provide a critical insight into the lived realities of women tea plantation workers in Assam through a feminist lens. The central argument of this paper is that, although women constitute a substantial proportion of the plantation labour force, their work remains undervalued, gendered, and structurally exploited, encompassing both paid plantation labour and unpaid reproductive responsibilities. Drawing on feminist perspectives on labour and social reproduction, the study highlights the gendered division of work, the adverse conditions under which women labour, and the socio-economic constraints that shape their marginalisation within the plantation system.

The current paper addresses pertinent research questions including an exploration of the working conditions of women working in tea plantations, the influence of gendered power relations on their work conditions, their day-to-day psychological, social and financial impediments, and how context-specific and feminist-focused policies can contribute to empowerment. In pursuit of these questions, the paper places special emphasis on the voices and lived experiences of women workers, while also contributing to broader debates on gender, labour, and justice within the plantation sector in India.

Mapping the Theoretical Context

The paper theorises and foregrounds the feminisation of labour as its central analytical framework. Feminisation of labour provides a critical lens for examining the gendered organisation of work beyond women's numerical participation in paid employment. It refers to the qualitative transformation of labour characterised by low wages, employment insecurity, limited social protection, and the systematic devaluation of work predominantly performed by women. Feminist political economy scholars argue that women's labour is constructed as flexible and supplementary, thereby reinforcing gendered hierarchies within labour markets. This transformation also reflects a broader shift in employment relations, where irregular and precarious conditions—once associated with women's 'secondary' work—have become widespread across sectors (Kanji and Menon-Sen, 2001). Azis (2020) describes feminisation as an "*increase in women employment, particularly in the labour sector*" and emphasises "*its focus on the changing nature of women's work, from domestic and care-based labour to subcontracted and informal employment*" (p.3).

Within this conceptual framing, plantation economies such as the tea industry represent a distinctive and historically entrenched site of feminised labour. Tea plantation work

relies heavily on women for labour-intensive tasks, while authority, ownership, and decision-making remain largely male-dominated. Feminisation theory therefore enables an analysis of how occupational segregation, paternalistic management practices, and uneven enforcement of labour regulations collectively sustain women's subordinate positions, even within formally regulated labour regimes (Khatoniar & Das, 2025). It also highlights the structural interdependence between paid plantation labour and unpaid reproductive labour, where women are expected to simultaneously manage wage work and domestic caregiving responsibilities, effectively subsidising the plantation economy.

In the context of Assam's tea plantations, feminisation of labour is further reinforced through the intersection of global capitalist processes and local socio-economic inequalities. Globalisation and expanding capitalist production have intensified structural vulnerabilities, disproportionately affecting women across rural, Dalit, and tribal communities in conditions of paid, underpaid, and unpaid labour (Patel, 2009, 2020). Within plantation labour systems, women's work is systematically devalued not only through wage structures but also through deeply embedded socio-cultural norms that normalise their dual burden of productive and reproductive work. These norms shape labour participation in ways that reproduce the perception of women's work as secondary, thereby sustaining its invisibility and economic undervaluation.

To further situate feminised labour within the plantation context, it is necessary to engage with the socio-cultural construction of gender. Gender, as a socially produced division of roles and expectations, operates as a foundational axis of hierarchy across households, workplaces, and institutions. It produces enduring inequalities in access to resources, opportunities, and decision-making power (Kabeer, 2000), thereby constraining women's agency—the capacity to define and pursue one's own life choices (Chakraborty, 2020). Sen (1988) further argues that persistent inequality may lead marginalised groups to internalise subordinate positions, thereby normalising compliance within unequal structures.

The tea plantation system exemplifies these intersecting gendered labour hierarchies. As Baruah (2018) explicates, plantations represent a transition from feudal to capitalist relations in which women's labour is instrumentalised as an input to production rather than recognised as skilled work. Women's work is routinely classified as unskilled and assigned lower status, confining them to the least valued segments of the labour hierarchy. Even where formal wage parity may exist, occupational segregation ensures that women remain concentrated in lower-valued tasks, demonstrating how gender continues to mediate labour valuation. Similarly, Neetha (2021) highlights that women's concentration in the lower segments of the informal economy and their persistent marginal status are reinforced by policy frameworks shaped by patriarchal assumptions that position women as dependents rather than workers in their own right. These structural conditions collectively sustain the long-term reproduction of feminised labour regimes.

Importantly, this theoretical framework also provides the basis for examining not only the continuity of feminisation in plantation labour, but also its evolving and increasingly institutionalised forms. The empirical findings of this study illustrate how feminisation is reproduced through contemporary mechanisms such as differential access to statutory entitlements, conditional welfare provisions, and managerial control over mobility, dignity, and bodily autonomy, thereby extending rather than merely replicating earlier forms of labour subordination.

Review of Literature

The existing literature on women workers in the unorganised sector collectively demonstrates that women labourers are systematically undervalued, economically insecure, and embedded within broader structures of patriarchy and economic exploitation. Scholars widely agree that the distinction between organised and unorganised labour is not merely administrative but deeply political, as it determines access to rights, protection, and dignity at the workplace. Divyakamakshi and Kalavathi (2014) highlight that while the organised sector is characterised by regular employment, unionisation, and state oversight, the unorganised sector—where a large proportion of women workers are concentrated—remains largely unprotected and precarious, thereby perpetuating structural inequality.

Empirical studies further reveal that women in the unorganised sector experience multiple and intersecting vulnerabilities, including job insecurity, long working hours, wage discrimination, limited legal protection, poor working conditions, and instances of exploitation (Gaur and Rana, 2002). These conditions are not incidental but structurally produced, reflecting the systemic positioning of women's work as secondary and undervalued. Such vulnerabilities directly constrain women's productivity, well-being, and upward mobility, reinforcing cycles of poverty and marginalisation (Buragohain and Anand, 2024).

Focusing specifically on plantation labour, scholars highlight the intersection of gender, class, and capitalist relations in shaping women's lived realities. Baruah (2022) underscores the reliance of the tea plantation industry on cheap and temporary female labour, arguing that this reflects both capitalist extraction and patriarchal control. Women are required to perform dual roles—as wage workers in plantations and as unpaid caregivers within households—thereby intensifying their labour burden. Marx's *Economic and Philosophical Manuscripts* (1844) further situates women's status as an indicator of broader societal development, pointing to the continued exploitation of women workers as evidence of deeper structural inequalities within capitalist systems.

The literature also documents the wide-ranging and persistent deprivations experienced by women tea plantation workers in their everyday lives. Sarkar, Chowdhury, Roy and Chowdhury (2016) identify challenges such as inadequate healthcare services, alcoholism, maternal mortality, denial of basic rights, child labour, lack of access to clean drinking water, early marriage, disease outbreaks, illiteracy, and entrenched

superstitions. These findings suggest that exploitation extends beyond the workplace into broader social and community spheres, significantly affecting women's health, education, and overall quality of life. Agarwalla (2021) further reinforces this argument by highlighting the paradox wherein women, despite being the backbone of the tea plantation economy, are relegated to the lowest occupational and social positions and continue to be perceived as unskilled and cheap labour.

While much of the literature emphasises structural oppression and victimhood, Borthakur (2023) provides an important corrective by foregrounding women's agency and everyday forms of resistance. Her study shows that women tea plantation workers in Assam negotiate workplace and household discrimination through subtle strategies such as deception, gossiping, slacking, rumour-spreading, and informal resistance. These practices, though often overlooked, demonstrate that women are not passive victims but active agents navigating constrained structural conditions.

Overall, the literature provides a comprehensive understanding of structural vulnerabilities such as wage discrimination, job insecurity, and poor working conditions. However, it remains limited in several important ways. First, much of the scholarship treats women workers as a homogeneous category, thereby obscuring sector-specific and context-specific realities, particularly within historically regulated plantation economies. Second, studies focusing on tea plantations have largely emphasised production relations and economic exploitation, with comparatively less attention to women's lived experiences, bodily vulnerabilities, and everyday negotiations of survival. Third, while agency is acknowledged, it is not sufficiently integrated with structural analysis, leading to a fragmented understanding of women's lived realities.

Despite Assam's centrality to India's tea economy, there remains a limited body of empirically grounded, gender-sensitive research that systematically engages with women tea plantation workers through sustained field-based inquiry. Existing studies do not adequately capture how gendered labour hierarchies are reproduced through everyday institutional practices, welfare exclusions, and differentiated access to rights within plantation systems. This creates a clear research gap in understanding the lived, embodied, and structural dimensions of women's labour in tea plantations.

Against this backdrop, the present study is conceptualised to develop a context-specific, gender-responsive, and empirically grounded understanding of the challenges faced by women workers in the tea plantation industry of Golaghat, Assam.

Research Objectives

The objectives of the study are as follows:

- To examine the working conditions of women workers in tea estates through a feminist analytical perspective.
- To explore the everyday lived experiences and challenges faced by women working in the tea plantation sector.

- To propose context-specific and gender-responsive strategies for the empowerment of women tea plantation workers.

Research Methodology

The study was conducted in the Golaghat district of Assam and adopted a qualitative approach with a descriptive research design. Golaghat district is a significant centre of tea plantation activity in Assam and forms an important part of the state's tea economy. The district comprises numerous tea estates engaged in the cultivation and processing of tea leaves. At present, there are seventy-four tea estates in Golaghat district, distributed across Golaghat, Bokakhat, and Dhansiri regions (Directorate of Tea Tribes and Adivasi Welfare, Government of Assam, 2023).

For the present study, two tea estates (referred to as TE1 and TE2) were selected due to their large workforce. TE1 comprised 3,214 tea plantation workers, of whom 1,994 (62%) were women, including 821 permanent and 1,173 temporary workers. TE2 comprised 2,371 workers, of whom 1,430 (60%) were women, including 428 permanent and 1,002 temporary workers.

Purposive sampling was used to select participants. The inclusion criteria focused on married women tea plantation workers aged 25–40 years with at least one child. Both permanent and temporary women workers were included, while those not meeting these criteria were excluded. A total of sixteen women tea plantation workers (eight from each tea estate) were interviewed in-depth after obtaining formal permission from the respective tea garden authorities.

Primary data were collected using semi-structured interviews. The first author conducted interviews with participants within the tea gardens and during home visits, enabling in-depth engagement with their lived experiences. In addition, interviews were conducted with tea garden managers of TE1 and TE2 to obtain contextual information on the organisational structure and functioning of the estates. Permission was also obtained to access official records, which facilitated the development of detailed profiles of the selected tea estates. Secondary data included estate records and reports, which were used to analyse workforce composition and demographic characteristics.

The study further employed participant observation during field visits. Detailed field notes were maintained to capture contextual and non-verbal dimensions of everyday work practices and social interactions.

Data were analysed using thematic analysis. Interviews were transcribed verbatim in Assamese and subsequently translated into English. The data were then systematically coded, and themes and subthemes were developed inductively. These themes were organised to ensure conceptual coherence and analytical depth, integrating diverse empirical insights related to the research focus. Field notes from observations were also incorporated to triangulate findings and strengthen interpretation.

Each of the sixteen women tea plantation workers who participated in the study was assigned a pseudonym (P1–P16), where “P” denotes participant, following informed consent. This coding system was adopted to ensure confidentiality and anonymity of respondents in accordance with ethical research considerations.

Ethical considerations, including informed consent, confidentiality, and voluntary participation, were strictly adhered to throughout the study.

Key Research Findings

The study reveals how gendered labour inequalities in tea plantations are systematically produced through conditional access to statutory rights and differentiated labour governance practices.

1. Meagre Wages

The women tea plantation workers received weekly wages of Rs. 232 per day on every Friday. It was disbursed in cash after a deduction of 12% as Provident Fund, resulting in a net amount of approximately Rs. 1200 to Rs. 1250 per week. While this wage structure appears uniform across workers, both male and female, the study reveals that the adequacy of wages must be understood within the broader structural context of plantation labour rather than as an isolated figure. Around 68% of the women tea plantation workers reported that their savings were insufficient to meet basic household needs, particularly in the context of rising prices and large family sizes.

P3: “The available savings are not enough to meet the basic requirements, as the prices of goods are also increasing. However, we try to manage with whatever we have.”

P10: “The available savings are too less. But, we have learned by now how to manage with fewer saving.”

The responses indicate that the issue is not merely the “low wage” in absolute terms, but the structural conditions that define how wages are fixed, perceived, and lived. The plantation wage system operates within a historically stabilised framework where wages are standardised across categories of workers, thereby limiting scope for negotiation. This standardisation often masks the inadequacy of wages in relation to contemporary cost of living and household survival needs.

The persistence of Rs. 1200–1250 per week as a wage level reflects the long-term institutionalisation of plantation labour as “low-cost labour”, which is maintained through a combination of economic dependency, restricted labour mobility, and limited alternative livelihood options. Workers’ dependence on plantation employment for housing and basic services further weakens their bargaining position, making wage negotiation structurally difficult.

Historically, plantation labour in Assam has evolved through systems of controlled settlement and dependency, where workers' mobility and economic choices remain constrained within estate boundaries (Duara & Mallick, 2012). This embedded dependence reduces the possibility of exit from the system, thereby reinforcing acceptance of prevailing wage structures. In addition, patterns of migration and historical marginalisation of labouring communities (Baruah, 2008) contribute to limited access to education and alternative employment pathways, further sustaining wage stagnation.

From a gendered perspective, women's wages are additionally shaped by the undervaluation of their labour within the broader plantation economy. Although wage parity may exist formally, women's work is often concentrated in labour-intensive yet low-status tasks such as tea plucking, which are socially constructed as "unskilled". This reinforces the perception of women's labour as supplementary, thereby legitimising low wage thresholds within the system.

Over time, such wage structures become normalised both institutionally and socially, reducing the perceived legitimacy of demands for wage enhancement. Women workers, embedded within these conditions of economic constraint and social acceptance, often develop coping strategies centred on subsistence management rather than wage resistance.

2. Unsanitary Workplace Environment

Chapter III of the Plantations Labour Act, 1951 mandates the provision of separate and adequately maintained latrines and urinals for male and female workers, to be located in accessible areas and maintained under hygienic conditions (Plantations Labour Act, 1951).

Interviews were conducted with women tea plantation workers and tea garden authorities from both estates to assess the availability of sanitation facilities at the workplace. According to the management of Tea Estate 1 (T1), a total of 994 latrines and urinals were provided, of which 546 were designated for female workers and 448 for male workers. In contrast, the authorities of Tea Estate 2 (T2) reported the availability of 16 sanitation units, evenly distributed between male and female workers. However, all sixteen women workers interviewed stated that no latrines or urinals were accessible within or in close proximity to the tea garden areas, indicating a clear discrepancy between official claims and workers' lived experiences.

P1: "There are no latrines near the tea garden. So, we do it outside."

P4: "Not a single latrine or urinal is available in the tea garden area. We don't have any other way apart from doing it outside."

The responses highlight not only a gap between official reporting and lived reality, but also the institutional conditions through which such gaps are produced and sustained. The existence of reported infrastructure alongside its non-accessibility to workers

indicates weak accountability mechanisms and limited independent monitoring within the plantation governance system. In practice, compliance with statutory provisions appears to operate more as a formal administrative requirement rather than an enforceable obligation shaped by workers' everyday experiences.

This gap is enabled by the structural positioning of women tea plantation workers within a highly dependent labour regime. Their access to livelihood, housing, and basic amenities is largely mediated through the plantation management, which significantly constrains their ability to question, report, or challenge inadequate facilities. Such dependency creates a condition where statutory rights exist on paper, but their realisation is contingent upon managerial discretion and local power hierarchies.

From a gendered and feminist perspective, the absence of sanitation facilities reflects the systemic invisibilisation of women's bodily and reproductive needs within plantation labour structures. The organisation of work assumes uninterrupted labour participation, without adequate consideration of gendered requirements such as privacy, sanitation, and menstrual hygiene. The discomfort associated with discussing bodily needs in male-dominated administrative spaces further contributes to institutional silence, where non-provision is normalised rather than contested.

Field observations corroborated that in the absence of accessible sanitation facilities, women workers were compelled to resort to open defecation, thereby compromising their dignity, safety, and health. Such conditions also severely undermine menstrual hygiene management, increasing vulnerability to infections and long-term health risks. The disparity between official records and ground realities suggests gaps not only in implementation but also in auditing and enforcement of labour welfare provisions under existing legal frameworks.

Thus, the issue extends beyond infrastructural inadequacy and reflects a deeper structural marginalisation of women within the plantation system, where gendered needs are systematically deprioritised despite formal legal safeguards.

3. Non-Compliance with Provision of Leaves with Wages

Chapter VI of the Plantations Labour Act, 1951 mandates that workers are entitled to paid leave at the rate of one day for every twenty days of work for adults, and one day for every fifteen days in the case of young workers. Data regarding the provision of annual leave with wages was collected through interviews with women tea plantation workers and tea garden authorities across both tea estates. The management of Tea Estate 1 (T1) reported granting fourteen days of paid annual leave to both permanent and temporary workers, while the authorities of Tea Estate 2 (T2) stated that workers received one day of paid leave for every twenty days worked in accordance with the provisions of the Act.

Contrary to these claims, four temporary women workers from T1 reported being denied annual leave on the grounds that their employment was limited to a six-month

period. As a consequence, the benefits relating to paid leave were effectively restricted to permanent workers. The findings therefore indicate partial compliance with the provisions of the Plantations Labour Act, 1951 and reveal greater vulnerability among temporary women workers in comparison to permanent workers.

The findings indicate that the gap between statutory entitlement and actual access is produced through the institutional organisation of labour within the plantation system. Although the law provides for paid leave, its implementation is filtered through employment categories that differentiate between “permanent” and “temporary” workers. This classification functions as an administrative mechanism through which rights are selectively extended, thereby transforming a universal entitlement into a conditional benefit.

This structural differentiation is further reinforced by the precarious position of temporary women tea plantation workers within the labour hierarchy. Their dependence on short-term or seasonal employment significantly limits their bargaining power and reduces the likelihood of raising grievances. In such a context, the fear of job loss and lack of alternative livelihood options contribute to passive acceptance of unequal treatment, thereby sustaining the existing system of exclusion.

From a feminist labour perspective, this reflects the broader process of casualisation of women’s work within plantation economies, where labour flexibility is achieved through insecurity and restricted social protection. Paid leave, instead of functioning as a statutory right, becomes a benefit that is unevenly distributed and closely tied to employment status. This enables plantation management to reduce financial liabilities while maintaining workforce control, thereby embedding inequality within the very structure of labour organisation.

Over time, such differential treatment becomes normalised within everyday plantation life. Women workers begin to internalise these distinctions as part of the work culture, particularly in contexts where hierarchical authority structures discourage collective resistance or questioning. This normalisation process ensures the reproduction of unequal labour relations, where temporary women workers remain at the margins of welfare entitlements despite their integral role in plantation production.

4. Non-Compliance with Provision of Maternity Leave

As per Chapter VI of Plantations Labour Act, 1951, workers shall be entitled to obtain maternity allowance in case if the woman is in confinement or expected confinement (Plantations Labour Act, 1951).

Information on sickness and maternity leave was obtained through interviews with women tea plantation workers and the management of both tea estates. The authorities reported that women workers were entitled to fourteen days of paid sick leave and nearly six months of maternity leave, divided between the pre-natal and post-natal periods. However, four temporary women workers from the T1 tea estate stated that

they were denied maternity leave on the grounds that their employment lasted only six months in a year. This indicates a clear exclusion of temporary workers from maternity benefits, amounting to a serious violation of women's labour rights and revealing the conditional and uneven application of statutory entitlements.

The findings indicate that maternity entitlements are not uniformly realised but are mediated through employment status, which becomes a key organising principle of inequality within the plantation system. Although maternity protection is legally guaranteed, its actual implementation is shaped by the classification of workers as permanent or temporary, thereby producing differentiated access to reproductive rights within the same workplace.

This exclusion is enabled by the structural organisation of plantation labour, where temporary employment is designed in ways that externalise women's reproductive needs from workplace responsibility. In such a system, maternity is not fully recognised as a labour-related entitlement but is instead repositioned as an individual or private responsibility of the woman worker. This redefinition allows the denial of maternity benefits to appear administratively legitimate within the existing labour structure.

The precarious position of temporary women tea plantation workers further reinforces this exclusion. Their dependence on short-term employment and continuous access to work for livelihood security significantly limits their ability to challenge such decisions or assert entitlements during pregnancy. In this context, reproductive health needs are subordinated to production priorities, where labour continuity is prioritised over social protection.

From a feminist political economy perspective, this reflects how the feminisation and casualisation of labour operate simultaneously in plantation economies. Women's reproductive roles are structurally unaccommodated within flexible employment regimes, and maternity protection becomes contingent rather than universal. Moreover, since maternity leave entails wage payment without immediate labour output, exclusion of temporary workers serves to reduce managerial costs while preserving labour flexibility.

Over time, such exclusion becomes normalised within plantation life, where both institutional actors and workers may come to accept differential entitlement as standard practice. This normalisation renders structural inequality less visible, despite its significant consequences for women's health, dignity, and long-term well-being. The result is a system in which maternity rights exist in principle but are unevenly realised in practice, particularly for the most insecure categories of women workers.

5. Non-Compliance with Provision of Sickness Leave

Under Chapter VI of the Plantations Labour Act, 1951, workers are entitled to sickness allowance upon certification by a qualified medical practitioner (Plantations Labour Act, 1951). The study also assessed the availability and usability of medical leave for

women workers. All fourteen women interviewed across the two tea estates reported that availing medical leave required the submission of a hospitalisation certificate. This condition effectively excluded instances where workers were unwell but required short periods of rest at home or outpatient treatment for two to three days. The women noted that medical leave was largely impractical, as their health needs often involved recuperation at home rather than hospital admission, even when advised by a doctor. Thus, while medical leave existed formally, its restrictive implementation rendered it largely inaccessible in practice. This points to a substantive violation of labour rights and underscores a mode of subordination that intensifies women workers' vulnerabilities within the plantation labour regime. The findings indicate that the operational definition of "illness" within the plantation system is narrowly constructed and institutionalised through administrative requirements. Only conditions requiring hospitalisation are recognised as valid grounds for leave, while short-term illnesses and preventive rest are excluded from consideration. This creates a structural gap between workers' lived health realities and the formal criteria used to regulate access to leave.

Such a framework shifts the burden of proof onto women tea plantation workers, who are required to demonstrate severity of illness in order to access entitled benefits. In doing so, sickness is transformed from a lived bodily experience into an administratively verified condition, thereby reducing the autonomy of workers in making health-related decisions. The requirement of hospital certification thus operates as a gatekeeping mechanism that regulates access to medical leave.

At the same time, the precarious economic position of women workers further constrains their ability to utilise such provisions. Dependence on daily wages and fear of wage loss discourage them from taking leave unless absolutely necessary. This creates a situation where women may continue working despite illness, thereby prioritising income security over health recovery.

From an economic perspective, such restrictive conditions also function as a cost-containment strategy. By limiting eligibility to cases of hospitalisation, the plantation system reduces the frequency of paid leave, thereby controlling wage-related expenditures. This reveals how labour welfare provisions are structured in ways that balance statutory compliance with cost minimisation.

Furthermore, women's health concerns—particularly those requiring rest and recuperation rather than clinical admission—remain structurally undervalued within the plantation labour regime. Over time, this institutional logic contributes to the normalisation of working through illness, reinforcing a labour culture where productivity is prioritised over health and well-being. The result is a system in which formal entitlements exist, but their accessibility is mediated by restrictive conditions that disproportionately disadvantage women workers.

Negotiated Agency Amidst Apathetic Management

The women tea plantation workers reported an indifferent and often inconsistent attitude of tea estate managers, whose frequent changes further contributed to uncertainty in workplace relations. Seven out of sixteen women workers also reported experiencing rude behaviour from managerial staff within the tea gardens.

P11: "We are all afraid of the manager, because he is very strict. Although it is a good thing, because this is the reason why the garden is in a good condition, but the problem is that, sometimes, we the women are not able to reach the tea garden on time, because we need to wake up early, finish up with all the household work, and the garden is also very far. Also, we never get timely drinking water. We are told to bring water bottles and biscuits from home. We bring our water bottle from home and use it till eleven, because by the time we get water, it is eleven. It takes a lot of time for us to reach as the garden is too far, but still, instead of 4pm, we are told to leave by 4.30 pm if we are late. We have a lot of things to say, but we stay silent as we don't want it to reach till our manager's ears. Everyone is afraid of him. He is extremely strict and rude. He says "You will not work and then you will come to me begging for money." If someone does not come for work, then he asks, "What did you come here for?" He becomes very rude. He doesn't even allow us to sit for some time in between our work. The manager also cuts our wages if we don't go. Suppose someone didn't go for work today, then she does not get the wages the next day. He speaks very rudely. In fact, our husbands also don't speak to us as rudely as much he does."

P12: "I am very scared of the manager. He is very strict. If any worker doesn't reach the garden on time, then the worker is sent back home and their wages are also deducted for that day. The problem is that, as we are women, we need to finish up with all the household duties before leaving for work. Also, the garden is located at a distance. Therefore, it takes time for us to reach till there. Not just me. Everyone is scared of the manager. He speaks very rudely when he is angry."

P13: "If we reach a little late then we get scolded, or sometimes Sir sends us back. These things happen... As the garden is at a distance from home, these things happen. We are sent back if we are late."

P7: "The manager comes to the garden in the morning in his car, and starts yelling as why anyone hasn't arrived yet. He says, "The 8 hours' time that you get is for your work, don't you know that you are supposed to work right now?" The problem is that, the tea garden where we work is located very far. So, it takes time for us to reach till there. Therefore, if we get late, he scolds us, and doesn't allow us to leave for home on time. He exceeds the working duration, if we get late. He also doesn't give us enough time to eat. We should get 1 hr lunch-break for eating, but we don't even get half-an-hour time. Sometimes, we just get 20 minutes. We also do not get drinking water for long durations. We hardly get any time to eat. He keeps yelling at us. Also, if we don't work, then we are not given any wages. If we are in

the need of money, even if we go till his office asking for it, he does not give. He does not give at all, no matter what. Our wages are so less, we hardly have any savings left with us; we need to educate our children as well. Still, even if someone, who doesn't have any savings left goes to him asking for money, he does not give. Sometimes, he also threatens us, that if we don't work, then we will not get our wages. If anyone reaches the garden late, then the manager sends them back and also doesn't provide them with the wages for that day. If someone is not well, then they get their wages if they come to the hospital, but if there is anyone else coming along with them, then they have to go to the garden for work, else their wage shall get deducted."

The narratives reflect that managerial authority is experienced not merely as administrative supervision but as a form of everyday disciplinary power embedded in the plantation labour system. The manager's role extends beyond work allocation into regulating time, movement, bodily needs, and wage security, thereby shaping a highly controlled work environment. Fear, rather than dialogue or negotiation, emerges as the dominant mode of workplace interaction.

This form of control is enabled by the structural hierarchy of the tea plantation system, where managerial authority is closely linked to decisions over wages, attendance, and job continuity. The workers' dependence on daily wages and limited access to alternative employment significantly constrains their capacity to contest managerial behaviour. As a result, disciplinary practices such as wage deductions, restricted breaks, and strict enforcement of reporting time function as mechanisms of labour control rather than isolated managerial decisions.

From a gendered perspective, these dynamics are further intensified by the intersection of work demands and unpaid domestic responsibilities. Women are required to complete household labour before joining plantation work, which directly affects punctuality and reinforces their vulnerability to punitive action. This creates a gendered temporal burden, where delays rooted in caregiving and domestic work are interpreted as indiscipline.

The accounts also indicate that silence and compliance are not passive responses but strategic adaptations within unequal power relations. Speaking out or challenging managerial authority is perceived as risky due to the possibility of wage loss or job insecurity. Consequently, women workers often negotiate agency through silence, endurance, and adjustment rather than over resistance.

While managerial strictness may be justified within productivity-oriented frameworks, the findings highlight that such control is experienced as disrespect and psychological pressure by workers. The absence of empathetic workplace practices, combined with rigid enforcement of rules, reinforces a climate of fear that undermines dignity and well-being.

Thus, the managerial behaviour cannot be understood solely at the level of individual conduct. It is embedded within a broader plantation system characterised by hierarchical authority, economic dependence, gendered labour burdens, and normalised disciplinary practices, where everyday disrespect becomes structurally sustained rather than incidental.

Non-Compliance with Work-Related Essentials

As per Chapter IV of the Plantations Labour Act, 1951, the employer shall ensure the provision to the workers of work-related essentials such as umbrellas, raincoats, blankets, and other amenities for protection from rain and cold (Plantations Labour Act, 1951).

During the interviews with women workers, eight out of sixteen reported not receiving essential work supplies. Women workers engaged on a temporary basis further shared that they were required to purchase basic work-related essentials on their own, as such provisions were largely restricted to permanent women tea plantation workers. This indicates a clear differentiation based on employment status and suggests only partial compliance with statutory provisions under the Act, while simultaneously increasing the financial burden on already low-paid workers.

The findings indicate that access to even basic work-related protections is structurally mediated through employment categorisation within the plantation system. The distinction between permanent and temporary workers operates as an administrative mechanism through which entitlements are selectively distributed. In this arrangement, “permanence” becomes the criterion for eligibility, thereby converting statutory welfare provisions into conditional benefits rather than universal entitlements.

This differentiation is enabled by the broader organisation of plantation labour, where segmentation of the workforce allows management to regulate costs and obligations. By limiting provisions such as protective gear to permanent workers, the plantation system reduces expenditure while transferring the responsibility of basic protection to temporary workers. For women already engaged in low-wage labour, this results in additional out-of-pocket expenditure, thereby deepening economic vulnerability.

From a labour process perspective, such exclusions are not merely administrative oversights but reflect a cost-management strategy embedded within the plantation economy. The classification of workers into permanent and temporary categories thus functions as a key mechanism through which welfare responsibilities are differentiated and minimised.

Over time, such unequal access becomes normalised within everyday plantation life. Temporary women tea plantation workers often adjust to these exclusions as part of routine work conditions, even when they are experienced as unfair. This normalisation is reinforced by the absence of alternative employment opportunities and the workers’ dependence on plantation wages, which limits their ability to challenge such practices.

The findings therefore highlight how labour protections, though formally mandated, are unevenly realised in practice, with employment status serving as the primary axis through which inclusion and exclusion from basic work-related rights are determined.

Gender Disparity in Trade Unions

One of the women tea plantation workers from the tea estate (T2) reported gender disparity in leadership within trade unions.

P9: “Did you hear about the Assam Chah Mazdoor Sangh? We have it here. If there is a meeting then the women do participate, but the position of secretary is not given to any woman. However, they pay attention to the problems we share. At present twenty-one of us are a part of the union.”

The absence of women tea plantation workers from key leadership positions, particularly that of secretary, indicates a persistent gendered hierarchy within trade union structures (Buragohain, 2023). Although women workers do participate in union meetings, their limited representation in decision-making positions constrains their ability to shape agendas, priorities, and outcomes. As a result, while women’s issues may be acknowledged within union discussions, their articulation and prioritisation remain mediated through predominantly male leadership structures.

The findings suggest that participation and representation operate as distinct dimensions within trade union functioning. While women workers are formally included as members, decision-making authority remains concentrated in male-dominated leadership roles. This structural arrangement produces a gap between presence and influence, wherein participation does not translate into substantive power over decisions affecting workers’ lives.

This imbalance is enabled through institutionalised leadership patterns within trade unions, where leadership positions are historically and consistently occupied by men. Such continuity reinforces a masculinised structure of authority that shapes not only decision-making but also the framing of issues considered important. Consequently, gender-specific concerns of women workers are often acknowledged but not fully integrated into collective bargaining priorities (Borah, Sharma & Dutta, 2026).

Power relations further shape women’s engagement within these spaces. The ability of women tea plantation workers to assume leadership roles or speak assertively is constrained by both formal hierarchies and informal norms that privilege male authority in public negotiation spaces. In such contexts, women’s participation is often limited to attendance or passive agreement rather than active agenda-setting.

Additionally, gendered divisions of labour in both domestic and plantation work restrict the time, mobility, and energy available for sustained union engagement. These structural constraints further reduce women’s likelihood of assuming leadership positions, thereby reinforcing their marginal presence within decision-making processes.

Thus, the findings highlight that trade union participation alone is insufficient to ensure gender equity. Without transformation in leadership structures and decision-making power, women workers remain included in form but excluded in substance from influencing labour governance and advocacy.

The Vulnerability of Temporary Women Workers

The research highlights the heightened vulnerability and structural subordination of temporary women workers in comparison to their permanent counterparts. Employed for only about six months each year, temporary workers were systematically excluded from several statutory and welfare entitlements, including medical and maternity benefits, and were also required to arrange their own work-related supplies.

This differentiation is not incidental but is embedded in the organisational structure of plantation labour, where employment status functions as a key axis for allocating rights and entitlements. The categorisation of workers into “permanent” and “temporary” creates an institutionalised hierarchy through which access to welfare provisions becomes conditional rather than universal.

The absence of year-round employment security further deepens their economic precarity, as irregular income flows limit their capacity to absorb additional expenses arising from healthcare needs, maternity-related costs, or occupational requirements. In this context, exclusion from statutory benefits is not only a legal or administrative gap but also a mechanism that reinforces economic dependence and labour vulnerability.

From a labour regime perspective, temporary employment enables cost flexibility for plantation management, as it reduces long-term obligations related to social security, leave entitlements, and workplace provisions. This structural arrangement shifts the burden of welfare provisioning onto workers themselves, thereby intensifying inequality within the workforce. Over time, such differentiated treatment becomes normalised within plantation life, where temporary workers internalise their marginal position as part of the employment structure. This normalisation further limits collective resistance and sustains patterns of unequal treatment within the plantation labour system.

Discussion

The empirical realities documented in this study can be most coherently interpreted through the framework of feminisation of labour, which extends beyond the increasing participation of women in wage work to include the systemic restructuring of labour into insecure, devalued, and socially unprotected forms. The findings demonstrate that feminisation in the tea plantation economy is not a static or historical condition but a continuously evolving process, reproduced through institutional practices, managerial control, and differentiated access to statutory entitlements.

A central finding of the study—the persistence of meagre wages—reflects the continued ideological positioning of women’s labour as secondary and replaceable within plantation

capitalism. However, this study extends existing scholarship by showing that wage suppression is not only a market outcome but is reinforced through institutionalised segmentation of labour between permanent and temporary workers, where wage-related vulnerabilities are intensified for temporary women workers through exclusion from benefits. This aligns with the broader governance failures highlighted in the Performance Audit on Implementation of Schemes for Welfare of Tea Tribes (Assam, 2024), which documents persistent gaps in enforcement of labour welfare provisions across tea estates. Thus, the “gap” between law and lived reality is not incidental but structurally produced through weak regulatory oversight and plantation-level discretion.

The study further demonstrates that feminisation operates through the gendered invisibilisation of embodied needs, particularly evident in the absence of accessible sanitation facilities. While official records claim adequate infrastructure, workers’ narratives reveal systemic non-functionality and inaccessibility (Khatoniar & Das, 2025). This contradiction indicates not only implementation failure but also a deeper governance logic where compliance is performative rather than substantive. The audit findings on welfare implementation similarly indicate that monitoring systems in tea estates remain weak and often fail to capture ground-level realities, enabling continued neglect of basic entitlements.

Importantly, the findings show that feminisation is being intensified through conditionalisation of rights, where entitlements such as leave with wages, maternity benefits, and sickness leave are made contingent upon employment status, documentation requirements, or restrictive verification processes. For instance, sickness leave is operational only under hospitalisation conditions, effectively excluding everyday illness and reinforcing disciplinary control over women’s bodies. Similarly, maternity benefits are denied to temporary workers on the basis of contractual duration, revealing how reproductive labour is excluded from institutional responsibility. These practices indicate a shift from overt exclusion to procedural exclusion, where rights formally exist but are practically inaccessible.

The study also highlights a less visible but significant dimension of contemporary feminisation: the emergence of negotiated agency under conditions of managerial authoritarianism. Women workers develop adaptive strategies to survive within systems characterised by wage deductions, surveillance, and time discipline. However, this agency is constrained and individualised rather than collective, shaped by fear of job loss and structural dependence on plantation employment. This reflects a shift in labour control mechanisms—from physical coercion to administrative and economic disciplining.

A further critical dimension emerging from the study is the weakening of collective bargaining structures. Although women participate in trade unions, their exclusion from leadership positions limits their ability to influence decision-making processes (Borah, Sharma & Dutta, 2026). This reinforces a gendered hierarchy within labour representation systems and reflects broader structural patterns of exclusion documented in plantation governance systems.

What emerges from these findings is not merely the continuation of feminised labour but its reconfiguration under neoliberal and managerial regimes of control, where exploitation is maintained through contractual fragmentation, bureaucratic barriers, and performative compliance with labour laws. The tea plantation system therefore does not simply reproduce older forms of feminisation; it actively deepens them through new mechanisms of invisibilisation, conditionality, and institutional neglect.

Conclusion

The lived realities of women tea plantation workers in Assam are embedded within deeply entrenched patriarchal structures and capitalist labour regimes that continue to shape their everyday experiences of work, dignity, and survival. The findings of this study demonstrate that women's labour in tea plantations is characterised not only by economic precarity but also by systemic marginalisation through unequal access to statutory entitlements, restrictive institutional practices, and gendered control over bodies, time, and mobility. Despite formal legal protections, the translation of rights into practice remains highly uneven, revealing a persistent gap between policy and lived reality.

Viewed through a feminist and capability-based lens, these conditions reflect structural constraints that significantly limit women's ability to exercise agency, expand choices, and achieve well-being. The intersection of gendered labour hierarchies, employment insecurity, and weak enforcement of labour protections collectively reinforces a system in which women workers remain positioned at the margins of recognition, protection, and decision-making. Their paid labour is inseparable from unpaid domestic and caregiving responsibilities, further intensifying their workload and constraining their opportunities for empowerment.

While the study proposes interventions such as rights-based awareness programmes, financial literacy initiatives, improved workplace infrastructure, gender audits, and stricter enforcement of labour laws, it is important to recognise that such measures operate within a historically entrenched plantation system shaped by long-standing relations of dependency, control, and institutionalised inequality. The persistence of managerial authority, contractual segmentation of labour, weak regulatory enforcement, and socio-economic dependence on plantation employment means that implementation of reforms is neither linear nor straightforward. Welfare provisions often remain conditional, unevenly enforced, or diluted through bureaucratic and organisational practices that are deeply embedded in plantation governance structures.

Moreover, the historical evolution of tea plantation labour in Assam has normalised hierarchies of gender, class, and labour control, making forms of subordination appear routine and socially acceptable over time. In such a context, even well-intentioned policy interventions risk being absorbed into existing structures without fundamentally altering power relations unless accompanied by sustained political will, institutional accountability, and collective worker mobilisation.

Thus, addressing the marginalisation of women tea plantation workers requires more than fragmented welfare measures; it demands a sustained transformation of structural power relations within the plantation economy. This includes strengthening enforcement mechanisms, ensuring accountability of plantation management, and creating institutional spaces that enable women workers' collective voice and representation. Only through such long-term and structurally grounded interventions can the embedded inequalities within the tea plantation system begin to be meaningfully challenged, paving the way for substantive rather than symbolic empowerment.

References

- Agarwalla, R. (2021). Tea garden women: Issues of socio-economic status—A study on tea garden women of Assam. *International Journal of Legal Science and Innovation*, 3(5), 27–30.
- Azis, A. A. (2020). Gender, globalization and feminization of division of labour. In *Proceedings of the 13th International Interdisciplinary Studies Seminar (IISS 2019)* (pp. 30–31). Universitas Brawijaya, Malang, Indonesia. https://www.researchgate.net/publication/340120145_Gender_Globalization_and_Feminization_of_Division_of_Labour
- Baruah, J. (2018). The public versus private space: The feminization of work in tea plantation. *ANTYAJAA: Indian Journal of Women and Social Change*, 3(2), 207–217. <https://doi.org/10.1177/2455632718794570>
- Baruah, J. (2022). Women labourers in tea plantation in Assam: A Marxist feminist articulation. In B. Nath & B. J. Kalita (Eds.), *Tea plantation labour of Assam: Migration, culture and identity*. Notion Press.
- Baruah, P. (2008). *The tea industry of Assam: Origin and development*. Eastern Book House.
- Besky, S. (2014). *The Darjeeling distinction: Labour and justice on fair trade tea plantations in India*. University of California Press.
- Borah, C., Sharma, P., & Dutta, D. (2026). Plantation patriarchy and gendered leadership: Women's political voice in tea plantations of Assam. *Labor History*, 1–29. <https://doi.org/10.1080/0023656X.2026.2634083>
- Borthakur, U. (2023). Women's activism and resistance to exploitation: A study of women workers in the tea estates of Assam. *Social Change*, 53(4), 486–499. <https://doi.org/10.1177/00490857231203415>
- Buragohain, J. & Anand, M. (2024). Feminist social work insights into the self and psychosocial environment of women tea plantation workers: Reflections from Golaghat district, Assam. *Journal of Social Work & Social Development*, 15(01), 1-18. Visvabharati University.
- Buragohain, J. (2023). *Psychosocial issues and working conditions of women tea plantation workers: A study from Golaghat District of Assam* (M.Phil. dissertation). University of Delhi.
- Chakraborty, A. (2020). Negotiated agency amidst overlapping vulnerabilities of women migrant workers in South Asia. *Social Change*, 50(1), 61–76. <https://doi.org/10.1177/0049085719901070>
- Chakraborty, A. (2022). Where do migrant women work? Glimpses of paid and unpaid work. In V. Patel & N. Mondal (Eds.), *Gendered inequalities in paid and unpaid work of women in India*. Springer Nature.
- Comptroller and Auditor General of India. (2024). *Performance audit on implementation for*

welfare of tea tribes. <https://cag.gov.in/en/audit-report/details/120539>

Divyakamakshi, G. & Kalavathi, S. (2014). Gender discrimination in an unorganised sector. *Indian Journal of Applied Research*, 4(12), 215–217.

Duara, M., & Mallick, S. (2012). *Tea industry in Assam (India): Issues of migration and gender discrimination*. International Proceedings of Economics Development and Research, 54, 174–177. <https://doi.org/10.7763/IPEDR.2012.V54.35>

Ekka, K. T. (2022). Gender and livelihood in post-cocoon activity: Understanding patriarchal legitimisation of women's work in Raigarh, Chhattisgarh. In V. Patel & N. Mondal (Eds.), *Gendered inequalities in paid and unpaid work of women in India*. Springer Nature.

Gaur, K. D., & Rana, R. (2002). Participation of women in unorganised sector. In J. L. Singh, R. K. Pandey, & A. K. Singh (Eds.), *Women in unorganised sector: Problems and prospects*. Sunrise Publications.

Government of Assam. (2023). *Golaghat district*. <https://golaghat.assam.gov.in/>

Gurung, M., & Mukherjee, S. R. (2018). Gender, women and work in the tea plantation: A case study of Darjeeling Hills. *The Indian Journal of Labour Economics*, 61, 537–553. <https://doi.org/10.1007/s41027-018-0142-3>

IDH. (2024). *Women in the Assam tea industry*. <https://www.idhsustainabletrade.com/publication/addressing-gender-based-violence-in-tea-gardens-in-india/#chapter-1>

Kanji, N., & Menon-Sen, K. (2001). *What does the feminisation of labour mean for sustainable livelihoods?* International Institute for Environment and Development. https://www.iatp.org/sites/default/files/What_does_the_Feminisation_of_Labour_Mean_for_.htm

Khatoniar, D., & Das, S. (2025). Women, work and tea plantations: Mapping gender on laboring bodies. *Asian Journal of Women's Studies*, 31(1), 26–46. <https://doi.org/10.1080/12259276.2025.2461341>

Mondal, N. (2022). Women's work: Workers' agency and dignity of labour under lens. In V. Patel & N. Mondal (Eds.), *Gendered inequalities in paid and unpaid work of women in India*. Springer Nature.

Neetha, N. (2021). Crisis after crisis: The pandemic and women's work. *The Indian Economic Journal*, 69(3), 425–440. <https://doi.org/10.1177/00194662211013234>

Patel, V. (2009). *Discourse on women and empowerment*. The Women Press.

Patel, V. (2020). Introduction: Changing contours of paid and unpaid work of women. *Social Change*, 50(1), 7–11. <https://doi.org/10.1177/0049085719901049>

Rasaily, R. (2014). *Women's labour in the tea sector: Changing trajectories and emerging challenges* (Discussion Paper No. 31). National Research Programme on Plantation Development.

Sarkar, S., Chowdhury, A., Roy, P., & Chowdhury, M. (2016). Socio-economic status of the tea garden women workers: A case study from Sub-Himalayan regions of West Bengal, India. *International Journal of Applied Research*, 2(10), 681–684.

Sen, A. K. (1988). Freedom of choice: Concept and content. *European Economic Review*, 32(2–3), 269–294.