



Rev.Aplw.(MD)Nos.42 and 43 of 2026

BEFORE THE MADURAI BENCH OF MADRAS HIGH COURT

DATED : 13.03.2026

CORAM:

**THE HONOURABLE MR.JUSTICE N.SATHISH KUMAR
AND
THE HONOURABLE MR.JUSTICE D.BHARATHA CHAKRAVARTHY**

Rev.Aplw.(MD)Nos.42 and 43 of 2026

and

W.M.P.(MD)Nos.6249, 6251 & 6252 of 2026

Rev.Aplw.(MD)No.42 of 2026:-

The Thozhuvam Trust,
Rep. by its Trustee,
P.Muthukumar,
S/o.K.Periasamy,
No.37, Gomathi Nivas,
Besant Road, Chokkikulam,
Madurai.

... Review Applicant / 3rd Party

-VS-

1.G.Thirumurugan @ Theeran Thirumurugan ... 1st Respondent/
Writ Petitioner

2.Union of India,
Rep. by the Principal Secretary,
Ministry of Environment,
Forest and Climate Change,
Indira Paryavaran Bhavan,
Jarbagh Road,
New Delhi.



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- 3.State of Tamil Nadu,
Rep. by the Principal Secretary to Government,
Environment for Forest Ministry,
State of Tamil Nadu,
Fort St. George,
Chennai.
- 4.The Principal Chief Conservator of Forests and Head of Forest Force,
Panagal Maligai, 1, Jeenis Road,
Saidapet, Chennai.
- 5.The Principal Conservator of Forests and Chief Wildlife Warden,
Panagal Maligai, 1, Jeenis Road,
Saidapet, Chennai.
- 6.The District Collector,
Office of District Collector,
Theni District.
- 7.The Wildlife Warden,
Megamalai Wildlife Division,
Forest Road,
Theni.
- 8.The District Forest Officer,
District Forest Office,
Theni, Housing Board Colony,
KRR Nagar, Theni.
- 9.The Regional Joint Director,
Office of the Regional Joint Director,
Animal Husbandry,
Allinagaram Veterinary Hospital Compound,
Theni.



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10.E.Ethalavulu

11.A.Benitto Paulraj

12.Malaimadugal Pathukappu Nalasangam (INSITU),
Rep. by its Secretary,
M.Sahaya Mathan,
No.74/5, Rayappar Street,
Rayappanpatti, Uthamapalayam,
Theni.

13.Colonel Pennycuick Parambariya Malaimadu Valarpor Sangam,
Reg.No.54/2018,
Rep. by its President C.Kennedy,
Door No.43, Ward 12,
Gounder Street, Melagudalur,
Uthamapalayam,
Theni.

... Respondents 2 to 13 /
Respondents 1 to 12

PRAYER: Review Application filed under Order XLVII Rules 1 and 2 read with
Section 114 of C.P.C., to set aside the order dated 04.03.2022, made in W.P.
(MD)No.8466 of 2020.

For Review Applicant : Mr.H.Arumugam

For R1 : Mr.T.Lajapathi Roy
Senior Counsel
for Dr.R.Alagumani

For R3 to R9 : Mr.D.Sadiq Raja
Additional Government Pleader

For R13 : Mr.A.Haja Mohideen



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Colonel Pennycuick Parambariya Malaimadu Valarpor Sangam,
Reg.No.54/2018,
Rep. by its President C.Kennedy,
Door No.43, Ward 12,
Gounder Street, Melagudalur,
Uthamapalayam, Theni District.

... Review Applicant

-VS-

- 1.G.Thirumurugan @ Theeran Thirumurugan
- 2.The Union of India,
Rep. through the Principal Secretary,
Ministry of Environment,
Forest and Climate Change,
Indira Paryavaran Bhavan,
Jarbagh Road,
New Delhi - 110003.
- 3.The State of Tamil Nadu,
Rep. by the Principal Secretary to Government,
Environment for Forests Ministry,
State of Tamil Nadu,
Fort St. George,
Chennai – 600 009.
- 4.The Principal Chief Conservator of Forests and Head of Forest Force,
Panagal Maligai, 1, Jeenis Road,
Saidapet, Chennai – 600 015.
- 5.The Principal Conservator of Forests and Chief Wildlife Warden,
Panagal Maligai, 1, Jeenis Road,
Saidapet, Chennai – 600 015.



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6.The District Collector,
Office of the District Collector,
Theni District – 625 531.

7.The Wildlife Warden,
Megamalai Wildlife Division,
Forest Road,
Theni – 625 531.

8.The District Forest Officer,
District Forest Office,
Theni, Housing Board Colony,
KRR Nagar, Theni – 626 331.

9.The Regional Joint Director,
Office of the Regional Joint Director,
Animal Husbandry,
Allinagaram Veterinary Hospital Compound,
Theni – 625 531.

10.E.Ethalavulu

11.A.Benitto Paulraj

12.Malaimadugal Pathukappu Nalasangam (INSITU),
Rep. by its Secretary,
M.Sahaya Mathan,
No.74/5, Rayappar Street,
Rayappanpatti, Uthamapalayam Taluk,
Theni District.

... Respondents

PRAYER: Review Application filed under Order XLVII Rules 1 and 2 read with
Section 114 of C.P.C., to review the order dated 04.03.2022, made in W.P.
(MD)No.8466 of 2020 and modified order dated 17.03.2022.



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For Review Applicant : Mr.A.Haja Mohideen

For R1 : Mr.T.Lajapathi Roy
Senior Counsel
for Dr.R.Alagumani

For R3 to R9 : Mr.D.Sadiq Raja
Additional Government Pleader

COMMON ORDER

The petitioners have filed the present Review Applications seeking to review the order dated 04.03.2022, made in W.P.(MD)No.8466 of 2020. According to them, their objectives are to protect native breeds of livestock from extinction and to implement development initiatives to ensure sustainable and resilient livelihoods.

2. It is the contention of the learned counsel for the petitioners that livestock forms an integral component of agriculture in India and makes a multifaceted contribution to its growth. According to the petitioners, the grazing restriction imposed on the grounds of forest conservation requires reconsideration. Therefore, they seek to recall the order passed by this Court dated 04.03.2022 in W.P.(MD) No.8466 of 2020, directing the authorities not to permit any domesticated cattle to venture into the forest area for the purpose of grazing.



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3. The learned counsels appearing for the petitioners would further submit that even under the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006, pastoral communities have grazing rights. According to them, the expression “community forest resource” includes grazing rights even in sanctuaries and national parks.

4. We have heard the learned counsel appearing for the parties and perused the materials available on record.

5. A detailed order had already been passed in the writ petition on 04.03.2022. In fact, in the writ petition, the respondents 11 and 12, representing a large section of cattle owners, were already parties to the proceedings. This Court had considered the importance of wildlife and, since the area is notified as a Tiger Reserve and the tiger is classified as an endangered species, and taking into consideration the provisions prohibiting cattle trespass into forests under Section 57 of the Tamil Nadu Forest Act, passed the said detailed order. Now, the said order is sought to be reviewed only on the ground that all the cattle owners are traditional forest dwellers.



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6. A perusal of the application filed for recall shows that the allegation that the petitioners are espousing the cause of forest dwellers is conspicuously absent. It is nowhere pleaded that all the cattle owners belong to pastoral communities. Further, any person claiming a right under the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006 must establish that they come within the purview of “Other Traditional Forest Dwellers.” However, absolutely no material has been placed or pleaded in this regard.

7. The intention of the petitioners appears to be to generally promote livestock breeding and the breeding of native varieties of cattle. No doubt, such purposes may be pursued. However, the State of Tamil Nadu otherwise has a vast extent of “Meikkal Poramboke” lands, and this Court has been passing orders for their preservation. Repeated directions have been issued not to convert such Meikkal Poramboke lands for other uses. When such large extents of land are otherwise available, and when the habitat of wildlife is shrinking and limited, any attempt to intrude into the minimal land available for the hapless flora and fauna cannot be countenanced.



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8. It must also be noted that several writ petitions, namely, W.P.(MD)Nos. 6994, 6998, 10556 of 2021 and 22146 of 2017, were filed before this Court by various persons claiming forest rights under the Forest Rights Act, 2006. By an elaborate order dated 17.03.2022, this Court held that none of the writ petitioners qualified as “Other Traditional Forest Dwellers.” That decision has attained finality.

9. Therefore, we do not find any error apparent on the face of the record warranting a review of the order dated 04.03.2022 passed in W.P.(MD)No.8466 of 2020. Accordingly, these Review Applications are dismissed. No costs. Consequently, the connected Miscellaneous Petitions are closed.

[N.S.K., J.] [D.B.C., J.]
13.03.2026

Neutral Citation : No
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To:-

- 1.The Principal Secretary,
Union of India,
Ministry of Environment,
Forest and Climate Change,
Indira Paryavaran Bhavan,
Jarbagh Road,
New Delhi – 110 003.
- 2.The Principal Secretary to Government,
State of Tamil Nadu,
Environment for Forest Ministry,
State of Tamil Nadu,
Fort St. George,
Chennai – 600 009.
- 3.The Principal Chief Conservator of Forests and Head of Forest Force,
Panagal Maligai, 1, Jeenis Road,
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- 4.The Principal Conservator of Forests and Chief Wildlife Warden,
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N.SATHISH KUMAR, J.
and
D.BHARATHA CHAKRAVARTHY, J.

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Common order in
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