

Invisible Labour: Feminist Critique of Occupational Health and Safety Protections for Women Pluckers in Assam's Tea Gardens Under the Plantation Labour Act, 1951

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Abstract:

This paper offers a feminist critique of occupational health and safety (OHS) protections for women pluckers in Assam's tea gardens, with a particular focus on the Plantation Labour Act, 1951. Despite constituting the backbone of the tea industry, women pluckers remain marginalized and their labour rendered invisible by gender-neutral legal frameworks that fail to address their specific health and safety needs. Drawing upon feminist legal theory, the study critically examines the language, implementation, and enforcement of OHS provisions within the Plantation Labour Act. Through a review of existing literature, field-based observations, and comparative international perspectives, this paper highlights how women's lived experiences—shaped by intersecting factors of gender, caste, and class—are systematically excluded from legal protections and policy interventions. The research reveals significant gaps, including inadequate reproductive health provisions, insufficient sanitation facilities, limited maternity benefits, and limited access to grievance redressal mechanisms. Furthermore, the analysis contextualises these shortcomings within broader patterns of socio-economic vulnerability and institutional neglect. The paper concludes by recommending gender-sensitive reforms to the Plantation Labour Act, enhanced enforcement, and the empowerment of women workers through collective action and legal literacy initiatives. Ultimately, the study argues that centring feminist perspectives is essential for achieving substantive gender justice and meaningful occupational health and safety protections for women in Assam's tea industry.

Keywords: Assam tea gardens, women pluckers, occupational health and safety, feminist legal critique, Plantation Labour Act 1951, gender justice.
"One is not born, but rather becomes, a woman."
— Simone de Beauvoir

1. INTRODUCTION

Assam's tea industry stands as a defining pillar of both regional identity and national economic prosperity in India. Sprawling across verdant estates that blanket the state's landscape, the tea gardens of Assam produce over half of the country's total tea output, generating substantial foreign exchange and employment. Crucial yet often overlooked in this economic narrative are the women pluckers—the backbone of the industry—who meticulously harvest tea leaves day after day. Women constitute more than half of the workforce in Assam's tea gardens, and their skilled, laborious work is fundamental to the quality and quantity of tea produced. Despite their centrality, women's labour in the plantations remains largely invisible, undervalued, and marginalised within both policy frameworks and everyday practice. The invisibility of women pluckers is not only a matter of economic recognition but also reflects deep-seated gendered hierarchies that shape the division of labour, access to resources, and exposure to occupational risks. Women in Assam's tea gardens are predominantly assigned the most physically demanding and repetitive tasks, such as plucking, carrying heavy loads, and sorting leaves, often under harsh climatic conditions. These tasks expose them to a range of occupational health and safety (OHS) hazards, including musculoskeletal disorders, exposure to pesticides, inadequate sanitation, and persistent reproductive health challenges. The interplay of gender, caste, class, and ethnicity further exacerbates their vulnerability, as many women workers belong to Adivasi and marginalised communities with limited access to social and legal protections.

At the legislative level, the Plantation Labour Act, 1951 (PLA) was enacted as a landmark statute to regulate the working conditions and welfare of plantation workers across India. At first glance, the PLA appears to offer a comprehensive framework for safeguarding the health, safety, and welfare of plantation labourers, mandating provisions for medical facilities, housing, creche facilities, clean water, and other welfare measures. However, a closer examination reveals that the Act's language and implementation are largely gender-neutral and fail to account for the specific needs and vulnerabilities of women workers. Critical feminist legal scholars have argued that such gender-neutrality, far from ensuring equality, often serves to obscure and perpetuate systemic disadvantages faced by women. For example, the PLA's requirements for medical care and maternity benefits are inadequately defined and poorly enforced, leaving significant gaps in protection for women pluckers.

The disconnect between legal frameworks and women's lived realities is further aggravated by systemic failures in implementation and enforcement. Labour inspections are infrequent and often superficial; grievance redressal mechanisms are inaccessible or ineffective; and trade unions—where they exist—tend to be male-dominated, seldom prioritising women's concerns. This results in a pervasive culture of neglect and impunity, where violations of OHS norms and women's rights are rarely addressed. The lack of gender-disaggregated data and the absence of women's voices in policy-making further entrench their marginalisation. Addressing the occupational health and safety of women pluckers in Assam's tea gardens thus requires a fundamental rethinking of both law and policy through a feminist lens. A feminist critique foregrounds the importance of recognising women's invisible labour, articulating their specific health and safety needs, and challenging the structural inequalities that underlie their exploitation. It also calls for an intersectional approach that accounts for how gender intersects with other axes of identity and disadvantage, such as caste, ethnicity, and economic class. This paper aims to provide a comprehensive feminist critique of OHS protections for women pluckers in Assam's tea gardens under the Plantation Labour Act, 1951. It interrogates the adequacy of the Act's provisions, examines the barriers to effective implementation, and situates these issues within the broader context of gendered labour relations in the plantation sector. Through a review of existing literature, analysis of legal texts, and insights from field studies and comparative international standards, this study seeks to answer the following questions: How do existing laws and policies fail to address the occupational health and safety concerns of women pluckers? What are the lived experiences of women in Assam's tea gardens, and how do they navigate legal and institutional barriers? What reforms are necessary to ensure substantive gender justice and meaningful protection for women workers in the tea industry? By centring the voices and experiences of women pluckers and applying a feminist legal critique, this paper contributes to ongoing debates around labour law reform and gender justice in India. It underscores the urgent need for gender-sensitive legal and policy interventions that move beyond tokenistic inclusion towards genuine recognition and empowerment of women in Assam's tea gardens.

2. LITERATURE REVIEW

The complex realities faced by women pluckers in Assam's tea gardens have received growing scholarly attention. However, significant gaps remain in understanding and addressing their occupational health and safety (OHS) needs through a distinctly feminist lens. Existing literature traces the roots of women's marginalisation in plantation labour to colonial-era practices, when British planters recruited predominantly

tribal and marginalised women for plucking due to perceptions of their docility and endurance (Baruah, 2008). This legacy continues to shape the gendered division of labour and the undervaluation of women's work within the tea industry today.

Research on OHS in Indian tea plantations highlights a persistent neglect of women's specific health risks. Studies by Bhowmik (1992) and others have documented that women pluckers commonly suffer from musculoskeletal disorders, repetitive stress injuries, and chronic pain due to the physically intensive nature of their work. Exposure to pesticides and agrochemicals without adequate protective gear has been linked to respiratory issues, skin diseases, and reproductive health problems (Goswami, 2013). Poor access to clean water, sanitation, and menstrual hygiene facilities further compounds health hazards, while inadequate maternity benefits and lack of childcare place an additional burden on women workers. Despite these well-documented challenges, analyses of the Plantation Labour Act, 1951, reveal a troubling lack of gender sensitivity. Scholars such as Kabeer (2015) argue that the Act's gender-neutral language fails to recognize the distinct needs of women, resulting in ambiguous or absent provisions for reproductive health, maternity protection, and workplace safety. Enforcement is another recurring theme in the literature: weak inspection regimes, under-resourced welfare officers, and limited legal literacy among workers have all contributed to the Act's ineffectiveness in practice (Bhowmik, 2011).

Feminist legal theory provides a critical framework for re-examining these issues. Drawing on the work of MacKinnon (1989) and other feminist scholars, researchers argue that formal equality—treating men and women equally under the law—often perpetuates substantive inequalities in contexts where social and economic realities are deeply gendered. In the case of Assam's tea gardens, this means that women's heightened vulnerability to occupational health risks is rendered invisible by laws that do not explicitly acknowledge gendered harms.

Internationally, the International Labour Organisation (ILO) and other bodies have emphasised the importance of gender-sensitive OHS standards. Comparative studies show that countries with robust legal protections tailored to women workers—and with active women's representation in unions—achieve better health and safety outcomes (ILO, 2018). However, little research has examined how these international standards could be integrated into India's legal and policy frameworks for plantation workers.

Finally, a notable gap in the literature is the lack of studies that centre the voices and agency of women pluckers themselves. Much of the existing research is descriptive or legalistic, with limited engagement with women's lived experiences or their strategies for resistance and collective action.

In sum, the literature points to the urgent need for intersectional, feminist critiques of OHS protections in Assam's tea gardens—critiques that both expose legal and institutional shortcomings and amplify the experiences and demands of women workers.

Table: Selected Occupational Health and Safety Indicators among Women Pluckers in Assam's Tea Gardens

Indicator	Value/Percentage	Source	Notes
Women as % of total tea workforce	50–60%	Baruah (2008); Mishra (2016)	Women are the majority in plucking and field jobs
Average daily wage (INR)	145–167	Oxfam India (2019); Sharma (2014)	Often lower than minimum wage and less than men's wages
Women reporting musculoskeletal issues	65%	Goswami (2013); Chakraborty (2013)	Due to repetitive, strenuous work
Access to safe drinking water	35%	Oxfam India (2019)	Many estates lack adequate facilities
Access to functional latrines	28%	Oxfam India (2019)	Women are often forced to use the fields
Women receiving maternity benefits	<20%	Mishra (2016); Samanta (2010)	Benefits are often not provided or not accessible
Use of protective equipment (PPE)	<10%	Singh (2013)	Few workers receive gloves, masks, etc.
Reported cases of workplace harassment	Underreported	Roy (2014); Sinha (2015)	Social stigma and fear discourage reporting

3. PLANTATION LABOUR ACT, 1951: PROVISIONS AND PROMISES

The Plantation Labour Act, 1951 (PLA) was enacted as a landmark piece of social legislation to regulate the conditions of work in plantations and ensure the welfare of plantation workers across India. Its scope encompasses tea, coffee, rubber, and other types of plantations that exceed specified area and workforce size thresholds. The Act lays out comprehensive provisions concerning working hours, wages, health, housing, welfare, and safety, positioning itself as a legal bulwark meant to uplift the socio-economic status of plantation workers, including those in Assam's tea gardens. The PLA mandates a range of welfare measures designed to protect workers' health and safety. Key provisions include the requirement for employers to provide medical facilities, including the appointment of qualified medical practitioners and the establishment of hospitals or dispensaries within or near plantations. The Act also mandates the supply of potable drinking water, adequate latrines and urinals, and crèche facilities for the children of women workers. In addition, it prescribes rules for working hours, rest intervals, overtime, and leave with wages, as well as the provision of housing and educational amenities for workers and their families.

However, a closer analysis reveals that the Act's language is predominantly gender-neutral, lacking explicit attention to the nuanced and specific needs of women workers. For instance, while it mandates the provision of crèches and maternity benefits, it does not elaborate on the quality, accessibility, or adequacy of these services. Provisions for reproductive health, menstrual hygiene, and occupational risks unique to women—such as heavy plucking workloads during pregnancy or exposure to agrochemicals—are largely absent or ambiguously defined. The result is a framework that assumes a universal worker experience, thereby rendering invisible the gendered dimensions of plantation labour.

Enforcement of the PLA's provisions is theoretically structured through the appointment of inspectors, medical officers, and welfare officers, who are empowered to ensure compliance and address grievances. State governments are tasked with framing rules and overseeing their implementation, and plantation management is legally responsible for the welfare of its workers. However, in practice, enforcement remains weak due to chronic understaffing, bureaucratic inertia, and insufficient resources allocated to regulatory agencies. Inspection visits are few and often superficial, and the lack of gender sensitivity among officials frequently results in women's concerns being overlooked or trivialised. Furthermore, the PLA is silent on evolving workplace challenges such as sexual harassment, gender-based violence, and the need for gender-sensitive grievance redressal mechanisms. The absence of clear guidelines and accountability fosters an environment in which violations go underreported and unaddressed. Trade unions, while recognised under the Act, are typically male-dominated and may not prioritise women's occupational health and safety issues. Despite its progressive intent, the Plantation Labour Act, 1951, thus falls short in fulfilling its promises for women workers in Assam's tea gardens. Its limitations—rooted in gender-neutrality, vague mandates, and poor enforcement—underscore the necessity of a feminist re-examination and targeted reforms to address the overlooked realities of women pluckers and to ensure that legislative protections are both meaningful and effective.

4. GENDERED EXPERIENCES IN ASSAM'S TEA GARDENS

The everyday realities of women pluckers in Assam's tea gardens are shaped by deeply ingrained gender norms, intersecting with caste, ethnicity, and class to define their roles, vulnerabilities, and access to rights. Despite comprising the majority of the plantation workforce, women remain systematically marginalised, both in social hierarchy and in the structure of work itself. Their experiences illuminate the inadequacies of existing legal frameworks and the urgent need for gender-sensitive reforms.

Women pluckers typically begin their day before dawn, balancing domestic chores with the demands of plantation work. The task of plucking tea leaves is physically taxing, requiring repetitive motions, long hours of standing or walking across difficult terrain, and the carrying of heavy baskets. Unlike their male counterparts, who often occupy supervisory or technical positions, women are overwhelmingly concentrated in the lowest-paid, most labour-intensive roles. The wage gap persists, with women frequently earning less than men for similar or greater workloads—a disparity exacerbated by irregular payments and deductions.

Occupational health risks are omnipresent in daily routines. Musculoskeletal disorders, chronic back and shoulder pain, and repetitive strain injuries are widespread, owing to the strenuous nature of plucking and the lack of ergonomic tools or practices. Exposure to harmful agrochemicals, often without adequate protective equipment or training, raises the risk of respiratory problems, skin diseases, and long-term reproductive health complications. Pregnant women face particular jeopardy, as the absence of alternative tasks forces them to continue strenuous labour until late in pregnancy, often without sufficient access to maternity benefits or medical care.

The lack of gender-sensitive infrastructure further compounds these difficulties. Sanitation facilities in many tea estates are inadequate or nonexistent, forcing women to wait until dark or venture into unsafe areas to relieve themselves. This routine not only impacts their health—leading to urinary tract infections and other ailments—but also exposes them to the risk of harassment and violence. Access to clean drinking water and menstrual hygiene products remains severely limited, with little provision made for these necessities in the workplace.

Social and cultural factors intensify these occupational hazards. Many women pluckers belong to Adivasi or marginalised communities, experiencing layered discrimination that restricts their mobility, bargaining power, and legal literacy. The hierarchical and patriarchal organisation of tea estates, combined with the dominance of men in trade unions and management, often silences women's voices and inhibits collective action. Reports of sexual harassment and gender-based violence are not uncommon, yet fear of retaliation or social stigma discourages most women from reporting abuses.

Despite these formidable challenges, women workers have demonstrated resilience and agency, forming informal support networks and participating in sporadic collective actions to demand better wages and conditions. However, institutional support for such initiatives remains weak, and the absence of robust grievance redressal mechanisms means their efforts rarely translate into sustained change.

The gendered experiences of Assam's tea pluckers thus reveal the profound disconnect between legislative provisions and lived realities. They underscore the necessity for intersectional, participatory approaches in law and policy that genuinely address the specific needs and rights of women workers, moving beyond tokenism to meaningful inclusion and empowerment.

5. GAPS AND FAILURES IN LEGAL AND PRACTICAL PROTECTIONS

Despite the progressive intent of the Plantation Labour Act, 1951, and its promises to safeguard workers' welfare, significant gaps persist between the law's provisions and the everyday realities faced by women pluckers in Assam's tea gardens. These shortcomings are evident both in the content of the legislation and in the mechanisms designed for its implementation, revealing a troubling disconnect that perpetuates the invisibility and marginalisation of women's labour.

One of the most glaring legal gaps is the Act's failure to recognise and address the specific health and safety needs of women workers. Although the law mandates general welfare measures—such as the provision of medical care, crèches, and sanitation—it does not articulate standards tailored to women's reproductive health, menstrual hygiene, or maternity protections. The absence of clear guidelines for the quality and accessibility of such facilities has led to inconsistent, often inadequate provision on the ground. For example, crèches may exist in name but remain under-resourced and inaccessible. At the same time, medical facilities are frequently ill-equipped to address women's health concerns, especially those related to pregnancy and reproductive health.

Enforcement and monitoring mechanisms also fall short. Labour inspections are sporadic and often superficial, with inspectors rarely trained in gender sensitivity or the specific risks faced by women workers. This results in a culture of noncompliance in which employers can avoid accountability for unsafe or exploitative conditions. The lack of a robust grievance redressal system further compounds the problem: women are often unaware of their rights or fearful of reprisal if they attempt to report violations, and complaints are seldom taken seriously by authorities or management. In many cases, the male-dominated structures of trade unions and estate administration leave women's voices marginalised or ignored altogether.

Other practical gaps arise from the socio-economic and cultural context in which women pluckers live and work. Many are members of historically marginalised communities, facing intersecting disadvantages of caste, ethnicity, and class. These factors limit their access to education, legal literacy, and alternative employment, making them more vulnerable to exploitation. Wage disparities persist, with women often earning less than men for similar work, and irregular or delayed payments are common. Inadequate housing, unsafe drinking water, and poor sanitation further erode women's well-being and dignity.

International standards, such as those set by the International Labour Organisation (ILO), emphasise the need for gender-sensitive occupational health and safety laws and practices. However, India's legal framework falls short of these benchmarks, and there is little evidence of efforts to integrate international best practices into national or local regulations.

The cumulative effect of these legal and practical gaps is to render women's labour—and the risks they face—largely invisible within the plantation system. This invisibility not only undermines the effectiveness of existing legal protections but also entrenches a culture of neglect and impunity. Addressing these failures requires both a fundamental rethinking of law and policy and the active participation of women workers in shaping their own protections and rights.

6. COMPARATIVE AND INTERNATIONAL PERSPECTIVES

The challenges faced by women pluckers in Assam's tea gardens are not unique to India; they reflect broader, global patterns of gendered labour, occupational risk, and legal inadequacy in plantation economies. Examining comparative and international perspectives offers valuable insights into how other countries and global institutions address occupational health and safety (OHS) for women in similar contexts, and highlights lessons that could inform reforms in India.

The International Labour Organisation (ILO) provides a comprehensive framework for protecting workers' rights, with a specific emphasis on gender equality and OHS standards. Key conventions, such as the ILO Occupational Safety and Health Convention, 1981 (No. 155), and the Safety and Health in Agriculture Convention, 2001 (No. 184), set out clear obligations for member states to develop gender-sensitive policies, provide adequate protective equipment, and ensure access to health services for all workers. ILO Convention No. 111 on Discrimination (Employment and Occupation) further requires states to eliminate gender-based discrimination and guarantee equal treatment in the workplace. While India has ratified some ILO conventions, critical ones related to OHS and gender equality remain unratified or poorly implemented, limiting their practical impact on the ground.

Comparative experiences from other tea-producing countries, such as Sri Lanka, Kenya, and Bangladesh, present a mixed picture of progress and persistent challenges. In Sri Lanka, for example, legal reforms and active engagement by women's unions have resulted in improved maternity benefits, dedicated sanitary facilities, and periodic health check-ups for plantation women. The presence of trade unions led and

represented by women has been instrumental in highlighting specific health needs, advocating for workplace improvements, and negotiating with estate management. While gaps remain, Sri Lanka's experience underscores the importance of women's collective agency and targeted policy interventions.

Kenya, another major player in the global tea industry, has made strides in integrating gender considerations into workplace safety. The Kenyan government, in collaboration with international donors and NGOs, has implemented codes of conduct for tea estates that include gender-sensitive OHS standards, sexual harassment policies, and grievance redressal mechanisms. Capacity-building programs for women workers and gender training for supervisors have contributed to increased awareness and reporting of abuses. Nevertheless, enforcement challenges and socio-economic barriers continue to hinder the full realisation of these protections.

Bangladesh, facing similar socio-economic and cultural constraints to those in Assam, has also sought to align its plantation labour laws with international standards. Recent amendments to the Bangladesh Labour Act have introduced provisions for paid maternity leave, separate toilets for women, and on-site medical care. However, implementation remains uneven, and many women workers continue to endure hazardous conditions and limited access to justice.

These international and comparative experiences demonstrate that legal reform alone is insufficient. Effective OHS protections for women require a holistic approach that combines robust laws, strong enforcement, gender-sensitive training, and meaningful participation of women workers in decision-making. The integration of international standards into national laws, the creation of accessible reporting and redressal systems, and the empowerment of women through education and union representation are critical components of sustainable change.

For Assam's tea industry, these lessons highlight the urgent need to move beyond token compliance and adopt a proactive, gender-sensitive approach to occupational health and safety. Aligning India's legal framework with ILO conventions, fostering women's leadership in unions, and investing in workplace infrastructure and training can help bridge the gap between legislative promises and lived realities. Such reforms are essential not only for improving the well-being of women pluckers but also for advancing gender justice and ethical standards in the global tea supply chain.

7. PATHWAYS TO REFORM AND EMPOWERMENT

Bridging the gap between legislative intent and the lived realities of women pluckers in Assam's tea gardens requires a multifaceted approach—one that not only addresses legal shortcomings but also empowers women workers to claim their rights and shape their futures. Pathways to reform and empowerment must therefore be comprehensive, participatory, and grounded in gender justice.

A first and crucial step is amending the Plantation Labour Act, 1951, to incorporate explicit, gender-sensitive provisions. These should mandate adequate menstrual hygiene facilities, reproductive health services, and robust maternity benefits, alongside requirements for separate and safe sanitation infrastructure for women. The law should explicitly address workplace sexual harassment and gender-based violence, with clear codes of conduct and confidential, accessible grievance redressal mechanisms. Periodic review and updating of these legal provisions, in consultation with women workers and relevant stakeholders, would ensure that the law evolves with changing needs.

Strengthening enforcement and accountability is equally essential. Labour inspections must be regular, rigorous, and gender-sensitive, with women inspectors included in monitoring teams. State governments should allocate sufficient resources for welfare officers, medical staff, and legal aid, and ensure their training in gender-based occupational health and safety issues. Transparent reporting systems, public disclosure of inspection findings, and penalties for non-compliance would foster greater accountability among plantation management.

The empowerment of women pluckers hinges on their capacity to organise, advocate, and participate in decision-making. Supporting the formation and leadership of women's collectives and unions is critical for amplifying their voices and negotiating for fairer conditions. Capacity-building programs focused on legal literacy, health education, and leadership development can further enhance women's agency and confidence. Partnerships with NGOs, civil society organisations, and international bodies can provide much-needed support, resources, and advocacy at both local and national levels.

Integrating international best practices and aligning with ILO conventions on gender equality and occupational health can help raise standards and foster consistency with global norms. Periodic benchmarking against successful initiatives in other countries, such as women-led union action in Sri Lanka or gender-inclusive codes of conduct in Kenya, can inform context-specific reforms in Assam.

Ultimately, meaningful reform must be rooted in the participation and perspectives of women workers themselves. By centring their experiences and fostering collective empowerment, Assam's tea gardens can move beyond symbolic compliance towards substantive gender justice and well-being. Such transformation is not only a moral and legal imperative but also vital for the long-term sustainability and ethical credibility of the tea industry.

8. CONCLUSION

The plight of women pluckers in Assam's tea gardens, as revealed through a feminist critique of occupational health and safety protections, underscores a persistent and troubling disconnect between legislative intent and lived experience. The Plantation Labour Act, 1951, while progressive in its original vision, remains deeply inadequate in addressing the specific and intersectional vulnerabilities faced by women workers. Its gender-neutral language and lack of enforceable, gender-sensitive provisions have resulted in the invisibilization of women's labour and an ongoing perpetuation of unsafe, unhealthy, and exploitative working conditions.

The analysis presented in this paper demonstrates that meaningful change requires far more than minor amendments or superficial compliance with statutory norms. Instead, it calls for a fundamental reimagining of both law and practice through a feminist and intersectional lens—one that explicitly recognises the unique occupational health and safety challenges faced by women and embeds their voices and experiences at the heart of reform. Comparative and international perspectives further highlight that robust legal protections, strong enforcement, and women's collective agency are all vital to achieving genuine gender justice in plantation labour.

Recommendations for reform must therefore be multidimensional: amending the Plantation Labour Act to mandate gender-sensitive OHS provisions; strengthening enforcement and accountability; empowering women workers through education and unionisation; and integrating international best practices. Above all, the participation of women pluckers in shaping these reforms is crucial to ensuring that protections are not only well-intentioned but also effective and transformative.

The future of Assam's tea industry depends not just on the volume or quality of its produce, but on the dignity, health, and empowerment of the women who form its backbone. Advancing gender justice in this context is not merely a legal or policy challenge—it is a profound ethical imperative that demands the recognition and valuation of invisible labour and the creation of equitable, safe, and just workplaces for all.

When women's labour is truly seen and valued, justice does not remain a promise—it becomes a reality woven into every leaf and every life.

REFERENCES

1. Baruah, S. (2008). *Tea Industry in Assam: Problems and Prospects*. Guwahati: EBH Publishers.
2. Bhowmik, S. K. (1992). Women Workers in the Unorganised Sector: The Case of the Tea Plantations in India. *Labour and Development*, 1(2), 31-42.
3. Bhowmik, S. K. (2011). Plantation Labour Act: Its Implementation in Tea Plantations. *Indian Journal of Labour Economics*, 54(2), 243-256.
4. Chakraborty, S. (2013). Health and Occupational Hazards of Women Workers in Tea Gardens: A Study of Assam. *Social Change and Development*, 10(1), 67-81.
5. Goswami, B. K. (2013). Occupational Health Problems of Women Tea Workers: A Study in Barak Valley, Assam. *International Journal of Scientific and Research Publications*, 3(1), 1-6.
6. International Labour Organization. (2018). *Women and Men in the Informal Economy: A Statistical Picture* (3rd ed.). Geneva: ILO.
7. International Labour Organization. (2001). C184 - Safety and Health in Agriculture Convention, 2001 (No. 184). Geneva: ILO.
8. International Labour Organization. (1981). C155 - Occupational Safety and Health Convention, 1981 (No. 155). Geneva: ILO.
9. International Labour Organization. (1958). C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111). Geneva: ILO.
10. Kabeer, N. (2015). Gender, Labour Markets and Women's Empowerment in the Global South. *Journal of International Development*, 27(1), 1-13.
11. MacKinnon, C. A. (1989). *Toward a Feminist Theory of the State*. Cambridge, MA: Harvard University Press.
12. Ministry of Labour and Employment, Government of India. (1951). *The Plantation Labour Act, 1951*. New Delhi: Government of India.
13. Mishra, A. (2016). Living and Working Conditions of Women Workers in Tea Plantations in Assam. *Economic and Political Weekly*, 51(21), 67-75.
14. Nongbri, T. (2014). Women Workers and Labour Laws in India: A Critical Appraisal. *Indian Journal of Gender Studies*, 21(3), 405-423.
15. Oxfam India. (2019). *Addressing the Human Cost of Assam Tea: Women Workers in Assam's Tea Sector*. New Delhi: Oxfam India.
16. Parthasarathy, G. (2010). Collective Bargaining and Women Workers in Plantations. *Labour Studies Journal*, 35(2), 123-145.
17. Roy, S. (2014). Women in the Tea Plantations of North East India: A Study on the Problems and Challenges. *International Journal of Humanities and Social Science Invention*, 3(1), 1-5.
18. Samanta, G. (2010). Gender and Development in the Tea Plantations of Assam. *Gender, Technology and Development*, 14(2), 229-251.
19. Sharma, J. (2014). Marginalization of Women Workers in Tea Estates: A Case Study of Assam. *Indian Journal of Social Development*, 14(1), 57-73.
20. Singh, B. (2013). Exploitation of Women Workers in Indian Tea Plantations: A Case Study of Assam. *Asian Journal of Research in Social Sciences and Humanities*, 3(8), 112-127.
21. Sinha, A. (2015). Gendered Spaces and Labour Rights: The Case of Assam's Tea Gardens. *South Asia Research*, 35(3), 245-264.
22. Standing, G. (1999). Global Feminization through Flexible Labor: A Theme Revisited. *World Development*, 27(3), 583-602.
23. World Bank. (2016). *Improving Working and Living Conditions for Women in Tea Plantations: Policy Brief*. Washington, DC: World Bank.
24. Zinkin, T. (1962). The Plantation Labour Act of 1951: A Review. *The Indian Journal of Labour Economics*, 5(2), 155-163.
25. Women's Empowerment in Agriculture Index (WEAI). (2020). *Empowering Women in Tea Plantations: Global Experiences*. Washington, DC: IFPRI.