

Journal of Kolkata Society for Asian Studies : Vol. 10. No. 2, Dec. 2024

The Journey of Rhythms: Copyright Protection and Cultural Significance of Limbu Ethnic Music

Purbita Das

The Journey of Rhythms: Copyright Protection and Cultural Significance of Limbu Ethnic Music

Purbita Das

Abstract

Recently, the major focus of Ethnomusicological research is on the study of the relationship among most of the world's cultures through music. Since Ethnomusicology follows the methodology to study the kinds of music with a socio-cultural perspective, therefore it will be more appropriate to describe Ethnomusicology as a study of Intercultural Musicology than cultural musicology. The Eastern Himalayan region is home to multiple ethnic groups and cultures. The socio-cultural study of these groups through Intercultural Musicology methodology will help in understanding some ethnic groups of this region. Limbu ethnic people are an important group residing in the hilly regions of Eastern Nepal, Sikkim, Darjeeling, Kalimpong, Bhutan, and other parts of North East India and the sociocultural study of this group in identifying their ethnic identity through Intercultural Musicology will be an interesting exploration.

Keywords : *Culture, Music, Methodology, Limbu, Ethnic*

Introduction

“Music is the expression of the soul of a people, and copyright ensures that this expression is respected and valued.” – WIPO Director General (Tang, Daren. Statement made during the launch of the WIPO for Creators initiative, Geneva, Switzerland, August 10, 2020. World Intellectual Property Organization (WIPO, Accessed July 15, 2024. <https://www.wipo.int>). The traditional music of any ethnic group or region is one of the basic elements which represent the symbol of their culture and ethnicity. In this paper, an attempt has been made to discuss the history and relevance of ethnic music of Limbu ethnic people which is instrumental for their cultural and ethnic identity. The Limbu and *Yakthung* communities are integral members of the *Kirata* nation or *Kirata* Confederation, with deep roots in the hilly and mountainous terrain of East Nepal spanning from the Arun river to the Mechi rivers. They also extend into Southern Tibet, Bhutan, Sikkim, Darjeeling, Kalimpong, and various regions of North East India. Today they have been scattered all over the world. The word Limbu means an archer or bearer of bow and arrow. The Limbus are known as *Yakthung Thi-bon* or Des Limbu (Ten Limboo), from which thirteen Limbu sub-tribes have emerged. A Limbu male is called *Yakthumba* and a female is known as *Yakthungma* (Subba, 2017). Their language is known as *Yak Thung Pan* the language belongs to the Himalayan group of Tibeto-Burman eastern sub-groups of complex pronominal dialects. It is placed in the Austro-Asiatic linguistic group. Their script is called '*Srijinga Lipi*'. They are also known as *Tsong* in Sikkim and *Subba* within the Nepali community (Subba, 1995).

Limbu Legacy: Cultural Heritage and Traditions

The Limbu culture boasts of a rich tapestry of folk literature, encompassing diverse forms such as *mundhum*, proverbs, folklore, and folk songs. Within Limbu folk literature, *mundhum* serves as a comprehensive repository, embracing legends, myths, folktales, historical narratives, sermons, and moral teachings conveyed through oral poetic tradition. A longstanding tradition prevails among the Limbu people of recounting *mundhums* and observing rituals and ceremonies in unique and time-honored ways. Central to their religious practices are shamans, known as *Phedangma*, who hold authoritative roles in overseeing significant rituals and societal occasions including weddings, birth ceremonies, and funerals (Limbu, 2015). It has its philosophy of life and world, its *Tumyang* tradition of organizing society, its own *YakthungPan* that is Limbu Language and *Srijings*, the Limbu script. They have their rich folklore, folk music, art and skills (Durga, S.A.K., 2017). They have their specific traditions and culture.

The Limbu communities residing in regions, such as, Sikkim, Darjeeling, Assam, Nepal, and Bhutan maintain distinct identities owing to the richness of their folk literature and cultural traditions, which remain vibrant and enduring. Among these traditions, *Yumawad* stands as a significant religious scripture, carefully preserved and passed down orally through generations by their spiritual leaders. This oral transmission of religious and cultural knowledge, termed *Yumawad*, holds a central place not only in Limbu religious practices but also finds expression in traditional music, blending social narratives, dreams, and everyday experiences (Subba, 1999). There has been a rich tradition of Limbu folk-songs like *Palam* songs, *Hakpare* songs, *Khyali*, *Tumhyang*, *Loi*, *Olo* songs, etc.

The Limbu folk dances, folk songs, folk music and folk musical instruments are very simple. The Limbu folk songs and music have kept alive their original belief as the re-telling of *Mundhums* and are included in Limbu traditional music with moral and social stories related to everyday life. The word *Lang* means dance, *Samlo* means music and the words *Mukla* and *Mungsama* mean musical instruments in Limbu language.

Tradition of Celebrating Limbu Ethnic Songs and Dances

Limbu ethnic music, dance and musical instruments are the resources of Limbu culture and identity. The ethnic music of Limbus is tremendously rich. There are songs and dances in Limbu culture for occasions from birth to death. There are songs which are sung in group, as duet and in solo style. This ethnic music reflects the joy, sorrow, traditions, religious beliefs, likes and dislikes of the Limbu society. The way of conversation of Limbus is itself very poetic, musical. One noteworthy genre of Limbu songs is “*Hakpare*,” often sung by *Fehtangbas*, the religious mentors, in a style that is both poetic and exploratory.

Other types of songs include Labour songs, agricultural songs, sad songs (*hamlapwah*), songs of joy, etc. Among sad songs, there are songs for those in sick condition and death lamentation songs. There are songs even for things left behind after death called ‘*Ningwahso Samlo*’. Some important Limbu songs are, namely, *Palam*, *Hakparey*, *Pangkhyali*, *lamri*, *dange* or *namringey*, *tamke*, *mangsamlo*, *mering*, *lori*, *kelang*, *mehngtang*, *kengjori*, *chirak*, *lak*, *tumyyang*, *pang* etc (Subba, 1999). Thus a detailed discussion of Limbu ethnic music can give us a lucid idea about their traditional music and its relation with their culture and identity.

Palam Samlo

The word *Palam* is the combination of two Limbu words, 'Pan' which means dialect or dialogue and 'Lam' means way or medium and *Samlo* means song. *Samlo* means song. In this way, *Palam* means a medium of talking (Subba, 2017). Today *Palam* denotes tune, poem, word, rhythm and an established form of music.

Some Limbus believe that there is a folk story behind this *Palam* song and dance. In the early days of hunting and collection from nature, foods were not enough for the people. In such a situation the leader of the Limbu group ordered a group of birds to provide the paddy seeds. During the harvesting time, these birds started to eat the ready crops. According to the agreement, people could not stop the birds. In such a situation people gathered together holding their hands started singing and dancing making a joint sound like 'ha ha ha ha....', stepping on the paddy, so that they can thresh it and can also scare the birds from coming closer to the paddy fields. This kind of song and dance developed as *Palam* Song and dance with time (Barman, 2022). At the end of each line of the song, a sound of ha ha ha... is drawn. It was in a different form in initial days. In the later days it was developed as the medium to exchange the feelings of each other. That is why *Palam* is considered as the romantic ethnic song of the Limbu.

Palam's song is sung in three parts. The first part is called '*Kai Semma*'. It is the introductory part, where one person or groups of people ask each other whether they have any blood relation or not. If the partners or group have any blood relationship they have to go through some customary obligation by touching the feet and cannot take part in song with such individual or group (Barman, J.K., 2022). If they do not have any blood relation then only they can continue with the next part of the song which is called '*Mayyapi*'. This is the main part of the song.

In *Palam* songs, there exists a poetic and rhythmic tune. These songs express personal past and present experiences, knowledgeable things, true love and affectionate relationship. This particular song cannot express any kind of vulgar or immoral feelings (Bohlman, P.V., 2002). Generally *Palam* songs are sung among young boys and girls in a verbal competitive manner or it is a kind of question-answer song between these groups. First an individual starts a line of the song then the group follow his or her line. In this way it takes the form of group song. Mainly in *Palam* there are the exchange of romantic words among young boys and girls.

In the third part of the song singers sing the '*Semmui*' (departing) *Palam*. This will be full of painful emotions to depart from one another. In this part singers use the words describing the uncertainty of life in this world. Emotions of imagination, expectation, difficulties are expressed by the singers. They pledge to meet again to sing and dance again in any particular place, festival or in some occasion. Finally, they bid farewell to each other with love and respect.

Hakparey samlo

Hakparey is another form of Limbu ethnic song. This type of song is sung in groups, as duet or solo. Melody and rhythm are the main characteristics of this type of song. Lyrics full of joy and sorrow make this song more touching and effective. The singers take permission (*tutummyang*) from the listeners for starting the song and take permission to end. The singers also recite *Mundhum* in the midst of the song.

According to *Mundhum*, *Hakparey Samlo* was introduced during the rule of Limbu king *Yehang*. The young daughter named *Idukhang* of the eldest king *Sodahang* died at a very young age. The King was immersed in grief. He locked himself in a room and did not talk to anybody for many days. People were waiting for their king to come out of this grief. One day suddenly the king came out of his palace and talked to the people (Chatterjee, S.K., 1951). There was a celebration among the people after this. People shouted *Hang Parey*, which means the King Speaks. Many people believe that in course of time this *Hang Parey* took the form of *Hakparey*.

Khyali Samlo

Khyali is also a popular song in the Limbu folk tradition. *Khyali* is much similar to *Palam* songs. But in this particular song there is no such kind of dance and songs as performed during the time of paddy harvesting. It is just like a musical competition between two young groups of boys and girls. This type of songs are simple but rhythmic and have both Limbu and Nepali words.

The origin of *Khyali* music dates back to the agricultural era when people used to work together. It was customary to assist each other's family. The families were also united during those times. Still there is tradition to help in farming called '*Parma*' in villages. It was during such gatherings that the tradition of *Khyali* originated. In Limbu traditions during the time of any social and family celebration, the guests are asked for any help through *Khyali*.

Tamke Samlo

It is believed that the *Tamke* song started during the agricultural era. The story behind the origin of this song is as follows. In the olden days, young people were too lazy. Instead of cultivating they were engrossed only with playing and hunting. The fertility of the soil and production of crops was seriously affected. As a result, there emerged the possibility of famine. An old man named *Kusarakpa* came up with a solution. He encouraged the young boys and girls to compete with each other while planting paddy by singing songs. This song is very much related with agriculture, that is the reason why Limbus called this type of songs as *tamke* which means *Tamma*, meaning to flourish and *kema* means to plant or strengthen. During the song they pray for the fertility of the soil and good production (Yakthung, M., 2015).

Pang Samlo

Pang Samlo is another popular folk song of the Limbu community. It can be entertaining and instructive depending on the time and situation. Rhythm and melody are the basis of this type of song. Through this, the feelings of love, sorrow, happiness, hope and despair; that are grown in the mind are expressed. Especially this type of song is sung in loneliness in the memory of love and close friends (Subba, S., 2018).

Nuwamphma (Lollori)

Lolori Samlo is a song for babies. A mother and another member of the family make a baby laugh, play, and sleep with this type of song. There are a variety of baby songs (lullabies) in Limbu traditions

Kesam

Ke(Chabrung) has many rhythms and dances. These rhythms and dances are believed to have been started by an old man named *Kusarakpa*. He is also believed to have sung *Kesam*. *Kesam* is sung to increase happiness, auspiciousness or joy.

Hamlakwa

In Limbu culture *Hamlakwa* is the mourning song, which is sung during the time of the death of some dear and close relatives. It is very touching and heartbreaking. *Hamlakwa* means the sound of crying (Subba, J. R., 2005).

Amubawa Hamlakwa

In life, everybody has to pass through different situations. If someone cries in a difficult situation, he or she also can cry in happiness. so, *Amubawa Hamlakwa* expresses such emotions when someone cries out of happiness.

Semui Hamlakwa

This type of song is sung during the time of taking leave of some near and dear one. This song expresses the agony and pain of parting with some loved ones.

Meringenn Hamlakwa

This song is sung when someone is on a deathbed. At the last moment of life. The crying sound in such a situation is known as *Meringenn Hamlakwa*.

Sangu Sakma Pengma Hamlakwa

Human birth is predictable. The probable date and month of birth are specified. But nobody can predict death. Life is entangled in the dilemma of life and death. *Sangu Sakma* is the outburst of such emotional expression (Yakthung, M., 2015).

Semering Hamlakwa

This particular song is the expression of grief during the time of burying some near and dear ones after death. *Semering Hamlakwa* is the emotion when the relatives of the deceased weep bitterly.

Niwangso Hamlakwa

This type of song expresses the painful emotions when someone misses and remembers dear ones who had passed away. Events, occasions or things that are related to the dead person remind the moments with him or her and make someone weep (Yakthung, M., 2015).

Kengjori Samlo

Kengjori Lang is a form of dance. *Keng* means the large hip bone and *Jori* means to knock. Thus this is a fun dance, so the songs for this also contain humour. There is a humorous question answer through songs between two groups. Dancers dance dashing their hips. The song resembles the *Palam* but it is a bit slow in rhythm.

Chirak Lang Samlo

Chiral lang Samlo is the song sung during the threshing of the paddy straw. Generally, healthy youths participate in this kind of dance. They move three steps forward and three backward holding their hands and dancing as if threshing the straw with their legs. The song related to this type of dance is also full of fun (Yakthung, M., 2015).

Chelekwa Pang Samlo

In Limbu folklore there is an abundance of songs related with imitation. Especially during festivals, gatherings Limbus perform this songs and dance for entertainment.

Limbu Tradition and Dances

Limbu culture is also rich in folk dances. To every particular music or song or occasion they have some specific dance. Among some culturally significant folk dances are as follows.

Yalang

Yalang dance originated since the time of the beginning of the ideas of the agriculture. In Limbu language ‘*Ya*’ means paddy and ‘*Lang*’ means dance. Thus *Yalang* means the dance performed during the time of paddy harvesting season. Limbus perform this type of dance throughout the year during the time of celebration or any festival. This is a group dance, which can be group of two persons ranging to a large group. Focus of the dance is in coordinating the footsteps. People with blood relations cannot take part in this kind of dance.

After holding hands and standing in a circle, the dance starts from the left step. Singing *palam*, the group moves forward and backward shaking hands and dancing. If someone by mistake touches the feet of anyone while dancing, the person has to apologize. In this dance, there is the tradition of arranging the dancing partners by brothers and sisters. There is no specific time for this dance. It may be for a short while or may continue for whole night and day. Even some fall in love during this type of dance.

K Lang

K means *Chyabrung* (a musical instrument, drum) and *Lang* means dance which is performed only during some auspicious occasions. Generally, it is performed without any song. The *Chabrung* players stand in a line and dance, women also join them.

Thakmama is a kind of *K Lang* which is performed during house warming ceremony. During dance they pray for the longevity and security of house to the god *Aukwanama*. *K Lang* dance is customary performed during any Limbu wedding. There are a variety of *Chabrung* dances, especially in the name of some animals and birds like *Yasa Lang*, *Khire Lang*, *Miluk Lang*, *Mora Lang*, *Muya Lang*, *Phungpith Lang*, *sawa Lang* and many more.

Limbu Folk Musical Instrument Chabrung

Limbu *Chabrung* is called *Kay* which etymologically means Tiger. *Chabrung* is a kind of drum made up of Tiger’s skin. The Nepali name *Chabrung* came from the sound this instrument produces. Man

who plays *Chabrung* is called '*Ke Sangla*'. In the olden days, *Chabrung* used to be made only from the trunk of a yeast tree. They used to cut out the middle portion of the tree by making holes from both sides of the trunk, which would be covered with the skin of the tiger (Limbu, 2011). Then the skin would be tightly stretched. To make the sound more melodious, a small hole is made in the middle of the *Chabrung* trunk and a small bamboo stick is inserted and the wheel is placed on its top, which is called '*Laikpa*'. However, in time, it is no longer possible to make *Chabrung* by using tiger's skin. In time, the skins of deer, chital, etc. are used to make *Chabrung*. Nowadays even the skins of goat, cow or calf are used. On the left side of the *Chabrung* is a small wooden piece called *goji*. Small woolen pieces and a bell called '*Singchangey*' is placed on the right side and is called '*Hukchangey*'.

Kom

An ancient musical instrument of the Limbus is called *Binayo* in Nepali. It is made from a small type of bamboo. In a small piece of dried bamboo a small hole of about 2-3 inches is made, so that a needle is pulled out of it. In order to hold it, a short thread is tied at the base and a long thread at the top. A kind of melodious sound comes out when the thread on the top is shaken and pulled. It is placed between both the tips and the long thread of the tip is shaken to release the rhythm from the wind. This instrument cannot give a perfect melody but can help in providing rhythm to a song.

Marchunga (Fenjey Com)

In the past, the *Murchunga* instrument was widely renowned as a symbol of love, cherished by young people for expressing their affections. To play it, one would hold it between the teeth and pluck it with a finger at its end. Unfortunately, the significance of this instrument is now fading, as younger generations show less interest in it.

Negra Mung

Known as '*Perage*' in *Mundhum* language and '*Negra*' in common parlance, this traditional percussion instrument holds significance among the Limbu Community. It is often played during weddings, ceremonial welcomes, and funerals, without any specific accompanying songs. Consisting of two parts, the male component, *Kumba*, is larger than the female component *Kumma*. Additionally, *Negra* is often accompanied by a bell. With historical roots dating back to the *Chogyal* Kingdom, it is regarded as a cherished gift to the Limbu people

Kingana

It is a bell like musical instrument, which is made up of circular of bronze leaf. A hole is made on one side and hanged with a thread. It is played by banging on the bronze leaf with a stick. It is played with the rhythm of *Negra*. In Limbu language called as *Negrare Kugamphma*, *Kingana* means Kingana's pair is *Negara*.

Limbu Tradition and Copyright Protection

Section 2(p) of the Copyright Act provides the definition of 'musical work' as follows:

"*musical work*" means a work consisting of music and includes any graphical notation of such work

but does not include any words or any action intended to be sung, spoken or performed with the music;

Copyright laws can protect the original musical compositions and performances of the Limbu people, ensuring their cultural expressions are not exploited without permission. Proper copyright management can provide the Limbu community with economic opportunities through royalties, licensing agreements, and cultural tourism (Durga, S.A.K., 2017). Copyright can facilitate the sharing of Limbu music in educational and cultural contexts, promoting understanding and appreciation of their heritage.

It is crucial to approach copyright protection with sensitivity to the cultural values and traditions of the Limbu community. The active participation of the Limbu people in the copyright process is essential to ensure that their rights are protected in a way that aligns with their cultural practices. Copyright protection can help promote Limbu music on a global scale, raising awareness and appreciation while ensuring that the benefits return to the community.

Judicial Analysis

Community for Creative Non-Violence v. Reid (1989): This case established the importance of determining the ownership of copyright in works created by independent contractors, relevant for works created in collaboration with non-Limbu artists or organizations.

Bright Tunes Music Corp. v. Harrisongs Music, Ltd. (1976): This case highlights issues of copyright infringement, where similarities in musical compositions led to legal disputes. It underscores the importance of protecting original Limbu compositions from unauthorized copying.

Indian Arts and Crafts Board v. The Sunshine State Cooperative Association (1991): While primarily focused on trademark issues, this case emphasizes the protection of indigenous cultural expressions, relevant for ensuring that Limbu music is recognized and protected as a distinct cultural heritage.

Conclusion

Limbu culture is thus so rich in traditional music, dance and songs. Ethnomusicological study of Limbu community is an interesting subject. The social fabric of Limbu ethnic people is vibrant with the existence of rich traditional music. This unique feature of Limbu culture and traditions is instrumental in maintaining the identity of Limbu community even among the multi-ethnic societies like of Nepal, Darjeeling, Sikkim and other places. In almost all social and religious ceremonies Limbu people are involved in music, dance, and use musical instruments (Gaenszle, M., 2024).

When looked at from the ethno musical perspective, in Limbu traditional rites, rituals, and ceremonies their ethnic music plays the central role. Right from birth to death, the Limbu traditions employ a great deal of music. Thus, it may be claimed that communication of Limbu ethnic identity is carried out in rites and ceremonies consisting largely of music. In this respect, in the Limbu ethnic group music serves as an essential criterion of their identity. It is an inseparable part of their social and cultural life. But in this age of globalization and digitization ethnic values gradually are losing their significance (Tang, D., 2020). All these root and rich traditional and cultural ethnic legacies have been limited to formal customs only.

Copyright protection is a vital tool in preserving and promoting the cultural significance of Limbu ethnic music. By safeguarding their musical heritage, the Limbu people can ensure its continued vibrancy and transmission to future generations, while also gaining recognition and economic benefits (Khamhak, B.L. & Subba, A.B., 2017).

The ethnic music of Limbus has created positive aspects in the movement for building and consolidating common ethnic identity. In India, the Limbus received tribal status in 2003 and the West Bengal Limbu Cultural Board was established by a resolution dated 10th February 2016 by the West Bengal Government. Every cultural aspect of the Limbu community deals a typical tribal features and music is one of the detrimental factors greatly contributes in retaining the tribal character of the Limbu ethnic people.

References

- Barman, J. K. 2016. 'Musical Instrument of Limbu in Sikkim'. *International Journal of Current Research*, 8(8), pp. 37419-37423.
- Barman, J. K. 2022. 'Folk Songs of Limbu: A Study and Analysis'. *IJNRD - International Journal of Novel Research and Development (IJNRD)*, 7(12), pp.365-371.
- Bohlman, P. V. 2002. Ethnic Music. In: Bohlman, P. and Otto, E., eds. *The Land without Nightingales: Music in the Making of German-America*.
- Chatterjee, S. K. 1951. *Kirata-Jana-Kriti: The Indo-Mongoloids: Their Contribution to the History and Culture of India*. Royal Asiatic Society of Bengal, Calcutta.
- Durga, S. A. K. 2017. *Ethnomusicology, A Study of Intercultural Musicology*. B. R Rhythms, Delhi.
- eLibrary TuCL, 2024. [Online] Available at: <https://elibrary.tucl.edu.np/handle/123456789/22201> [Accessed 20th June 2024].
- eLibrary TuCL, 2024. [Online] Available at: <https://elibrary.tucl.edu.np/handle/123456789/12619> [Accessed 20th June 2024].
- Gaenszle, M. 2024. Martin Gaenszle's ResearchGate profile. [Online] Available at: <https://www.researchgate.net/profile/Martin-Gaenszle> [Accessed 20th June 2024].
- Khamhak, B.L. & Subba, A.B. 2017. *Literary Theory and Limboo Literature*. Printed at Riza Press, Jorhang, South Sikkim.
- Limbu, R.K. 2011. 'Ya? Lang: An Intangible Limbu Cultural Heritage'. *Contributions to Nepalese Studies*.
- Limbu, R.K. 2015. *Limbu Indigenous Knowledge and Culture*. National Foundation for Development of Indigenous Nationalities, Jawalakhel, Lalitpur.
- Limbus, n.d. Limbus: An outline of their music and culture. [Online] Available at: https://www.academia.edu/8003804/LIMBUS_AN_OUTLINE_OF_THEIR_MUSIC_AND_CULTUR [Accessed 20th June 2024].

- Research Gate, 2019. Cultural Heritage and Intellectual Property. [Online] Available at: https://www.researchgate.net/publication/329417949_Cultural_Heritage_and_Intellectual_Property [Accessed 29th June 2024].
- Research Gate, 2020. Exploring Indigenous Knowledge System and Limbu Cultural Identity in Nepal. [Online] Available at: https://www.researchgate.net/publication/342281806_Exploring_Indigenous_Knowledge_System_and_Limbu_Cultural_Identity_in_Nepal [Accessed 15th July 2024].
- Subba, B. B. 1999. *Limbu Sanskritima Lokgeetko Mahatwa*. Edited by Pawan Chamling ‘Kiran’. Nirman (Nepali), South Sikkim.
- Subba, C. 1995. *The Culture and Religion of Limbu*. Printed at Bani Offset Mudranalaya, Teku, Katmandu.
- Subba, D. 2017. *Limbu Lokwarta*. Translated by Srimati Hanga Labung and Srimati Anu Gurung. Katmandu.
- Subba, J. R. 1999. *The Limboos of the Eastern Himalayas with special Reference to Sikkim*. Printed at Ambika Printers, New Delhi.
- Subba, J.R. 2003. *Mujoklung Khajoklung Mundhum*. Printed at Ambika Printers, 109 Ground Floor, Prakash Mohalla, East of Kailash, New Delhi.
- Subba, J. R. 2005. *The Philosophy and Concept of Yuma Samyo Tradition*. Printed at Ambika Printers, Basement Prakash Mohila East of Kailash, N.D.
- Subba, S., 2018. *Salesian Journal of Humanities and Social Sciences*, IX, pp. 56-63.
- Tang, D. 2020. Statement made during the launch of the WIPO for Creators initiative, Geneva, Switzerland, August 10. World Intellectual Property Organization (WIPO). Accessed July 15, 2024. Available at: <https://www.wipo.int>.
- Yakthung, M. 2015. *Yakthung Paandang nu sapsok*. Printed at Kanche Printing Press, Katmandu.

Bio Profile of the Author:

Assistant Professor, School of Law, Brainware University

Email id: pd.law@brainwareuniversity.ac.in.