



DAILY CURRENT AFFAIRS 20-01-2026

Mapping Perspective

1. Greenland

Prelims Perspective

2. Jamma Bane Lands
3. INS Sudarshini

Mains Perspective

4. Tiger Global Tax Ruling
5. Coconut Root Wilt Disease

Greenland

Syllabus: Prelims Bits – Mapping.

Context:

- Proposal by former US President **Donald Trump to acquire Greenland** has resurfaced in discourse.
- Strong opposition from:
 - **Denmark** (sovereign authority)
 - **European allies**
- Grounds of opposition:
 - **Violation of sovereignty**
 - **Contravention of international law**

About Greenland

a) Political Status

- **Kalaallit Nunaat** (indigenous name).
- World's **largest island**.
- Status:
 - **Self-governing territory** within the **Kingdom of Denmark**.
 - Extensive internal autonomy under **Self-Rule Act, 2009**.
- Powers distribution:
 - **Denmark controls:** Defence, foreign affairs, currency.
 - **Greenland controls:** Domestic governance, resources, administration.
- Right to **self-determination** recognised under the Self-Rule Act.

b) Location and Strategic Geography

- Situated in:
 - North Atlantic Ocean
 - Arctic region
- Lies:
 - Largely **within the Arctic Circle**
 - Between **North America and Europe**

- Strategic importance:
 - Arctic sea routes
 - Proximity to North America
 - NATO security architecture



Key Physical and Geological Features

a) Greenland Ice Sheet

- Covers **~80% of the island**.
- Second largest ice sheet after **Antarctica**.
- Significance:
 - Major indicator of **global climate change**
 - Key contributor to **sea-level rise**.

b) Geological Structure

- Part of the **Canadian Shield**.
- Dominated by **Precambrian rocks**.
- Represents ancient continental crust.

c) Fjords and Glaciers

- Deeply indented coastline with numerous fjords.

- Important glacier:
 - **Jakobshavn Glacier** – among the fastest-moving outlet glaciers globally.

Resource Potential

- Rich in:
 - Rare Earth Elements (REEs)
 - **Critical minerals** (for batteries, electronics, defence)
 - Potential **hydrocarbon reserves**
- Strategic relevance in:
 - Global energy transition
 - Supply chain security
 - US–China technological competition.

International Law and Sovereignty Constraints

a) UN Charter Provisions

- **Article 2(4)** of the UN Charter:
 - Prohibits **threat or use of force** against territorial integrity or political independence.
 - Bars acquisition of territory through coercion.

b) Principles Governing Territorial Transfer

- Any transfer requires:
 - **Free and voluntary consent** of:
 - Sovereign state (**Denmark**)
 - People of Greenland.
- Annexation or coerced cession:
 - Considered **illegal** under modern international law.
 - Violates principles of:
 - Sovereignty
 - Self-determination
 - Non-intervention.

Jamma Bane Lands

Syllabus: GS-2: Governance, land reforms

Context:

Recently, the **Karnataka government amended its land revenue law** to modernise and resolve long-standing issues related to **Jamma Bane lands**, an age-old system of land records prevalent in the **Kodagu (Coorg) district**.

About Jamma Bane Lands

- **Meaning:**
 - *Jamma* means **hereditary**.
- **Nature of Tenure:**
 - Jamma Bane is a **distinct form of land holding** unique to Kodagu district.
 - It is different from other land tenure systems found in Karnataka.
- **Historical Background:**
 - These lands were granted between **1600 and 1800** by:
 - Rulers of the erstwhile **Kingdom of Coorg**, and
 - The **British administration**.
 - Grants were made to local communities **in return for military service**.
- **Land Characteristics:**
 - Comprise two major components:
 - **Wetlands** used mainly for **paddy cultivation**, and
 - **Forested highlands**, many of which later evolved into the famous **coffee estates of Coorg**.
- **Legal Framework:**
 - Initially governed by the **Coorg Land Revenue and Regulations Act, 1899**.
 - After integration with Karnataka, these lands came under the **Karnataka Land Revenue Act, 1964**.

Issues with Jamma Bane Lands

1. Ownership Complications

- Ownership is recorded in the name of the **original pattedar** (first landholder).
- Over generations:
 - Names of successors were **added**, but
 - The **primary ownership record was never changed**.

- This led to **outdated and ambiguous land records**.

2. Administrative and Legal Problems

- Difficulty in:
 - Sale or transfer of land
 - Obtaining loans
 - Clear succession recognition
- Increased scope for **disputes and litigation** due to unclear titles.

Significance of the Amendment

- Aims to **modernise colonial-era land records**.
- Seeks to ensure:
 - Clear ownership titles
 - Better land governance
 - Reduced disputes and administrative delays

INS Sudarshini

Syllabus: Prelims – Current Affairs | GS-3; Security Forces & Defence

Context:

INS Sudarshini will undertake *Lokayan 26*, a 10-month transoceanic expedition.



About INS Sudarshini

- Indigenously built Sail Training Ship (STS).
- Built by **Goa Shipyard Limited**.
- Based at **Kochi, Kerala** under the **Southern Naval Command**.
- Commissioned on **27 January 2012**.
- Purpose: To train sailors in seamanship, survival at sea, weather handling, and navigation.

Key Features

- Three-masted **barque**.
- Operates under **sail or power**.
- Endurance: Continuous deployment up to **20 days**.

Lokayan 26 Expedition

- Duration: **10 months**.
- Distance: Over **22,000 nautical miles**.
- Ports: **18 foreign ports** across **13 countries**.
- Participation in global events: *Escale à Sète* (France) and *SAIL 250* (New York, USA).
- Objective: Long-range sail training for Indian Navy and Coast Guard trainees.

Tiger Global Tax Ruling

Syllabus: GS-3: Indian Economy – Taxation

Context:

- Supreme Court held that Tiger Global's **\$1.6 billion capital gains** from selling Flipkart stake to Walmart are **taxable in India**.
- Denied benefit under the **India–Mauritius DTAA**.
- Overturned **Delhi High Court (2024)** and upheld **AAR (2020)** view.
- Considered a **landmark ruling** for cross-border investments and startup exits.

Core Legal Issue

- Whether Mauritius-based Tiger Global entities were entitled to **capital gains tax exemption** under **India–Mauritius DTAA**.

- Applicability of:
 - **Grandfathering clause** (shares acquired before 1 April 2017)
 - **Treaty abuse / tax avoidance** doctrine
 - **Substance over form** principle

Deal At The Centre Of Contention

THE DEAL In 2018, three funds of Tiger Global sold their shares in Flipkart:  <ul style="list-style-type: none">➤ Tiger Global International II Holdings (Mauritius) ₹13,122cr➤ Tiger Global International III Holdings (Mauritius) ₹1,259cr➤ Tiger Global International IV Holdings (Mauritius) ₹58cr	TIGER GLOBAL'S CONTENTION: <ul style="list-style-type: none">➤ No capital gains arise on investments made before April 2017 when India-Mauritius treaty was amended➤ Hold valid tax residency certificate issued by Mauritius I-T'S COUNTER <ul style="list-style-type: none">➤ Mauritius entities had limited commercial substance of their own and real control and decision-making lay outside Mauritius➤ Arrangement structured to obtain tax treaty benefits, raising concerns of treaty abuse & impermissible avoidance
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Background of the Dispute

Investment Structure

- Tiger Global invested in Flipkart via:
 - Tiger Global International II, III, IV Holdings (Mauritius-based).
- Exit in **2018** after Walmart acquisition.

Claim by Tiger Global

- Sought "**Nil**" **withholding tax certificate**.
- Argued:
 - Capital gains exempt under DTAA.
 - Protected by **grandfathering clause**.

Tax Authorities' Stand

- Mauritius entities:
 - Lacked **independent decision-making**.
 - Had **no real control** over investments.
- Effective control lay in **United States**.

- Structure primarily to **obtain treaty benefits**.

Institutional Trajectory of the Case

Authority	Key Finding
AAR (2020)	Structure designed to avoid tax; DTAA benefit denied
Delhi High Court (2024)	Set aside AAR; held tax avoidance finding arbitrary
Supreme Court (2026)	Reversed HC; upheld AAR; gains taxable in India

Supreme Court's Key Reasoning

- DTAA protection not automatic.
- Applies only when:
 - Assets are **directly owned** by Mauritian entity.
 - There is **genuine commercial substance**.
- Held that:
 - Mauritius entities were **conduit entities**.
 - Real control and decision-making were **outside Mauritius**.
- Reaffirmed principle of **"Substance over Form"**.

Important Concepts for Prelims

(a) DTAA – Double Taxation Avoidance Agreement

- Bilateral treaty to avoid taxing the same income in two countries.

(b) Grandfathering Clause

- Exempts transactions done **before a new law/date** from new tax regime.
- In this case: shares acquired before **1 April 2017**.

(c) Tax Residency Certificate (TRC)

- Proof of tax residence to claim DTAA benefits.
- SC held: **TRC alone is not sufficient**.

(d) Permanent Establishment (PE)

- Fixed place of business through which business is carried on.
- SC: DTAA applies only if assets are owned through **PE in Mauritius**.

Broader Implications

For Foreign Investors

- End of automatic treaty protection.
- Greater scrutiny of:
 - Decision-making authority
 - Commercial substance
 - Operational presence

For Offshore Structures

- Mauritius and Singapore routes face:
 - **Closer examination**
 - Possible **reassessments** where legally allowed

For Deal-Making

- Higher:
 - Tax uncertainty
 - Litigation risk
 - Compliance costs
- Tax insurance and indemnities become **costlier and scarcer**.

Impact on Indian Startup Ecosystem

- Comes amid **startup funding slowdown**:
 - 2025 funding: **\$10.5 billion**
 - 17% lower than 2024.

Likely Effects

- More cautious:
 - Exit planning
 - Valuations
 - Structuring of investments
- Investors to prioritise:
 - Profitability
 - Tax certainty
 - Robust governance structures.

Significance

- Reinforces India's shift towards:
 - Anti-treaty abuse jurisprudence
 - GAAR-type reasoning
- Signals:
 - India's commitment to curb **round-tripping and treaty shopping**.
- Balancing challenge:
 - Revenue protection **vs** ease of doing business.

Coconut Root Wilt Disease

Syllabus: GS-3: General Science – Diseases.

Context:

Recently there is increase in Coconut Root Wilt Disease.

What is it?

- A **chronic, debilitating disease** of coconut palms.
- Caused by a **phytoplasma** (phloem-limited pathogen).
- Non-fatal, but leads to long-term decline in productivity.

Geographical Distribution

- Predominantly in **southern India**:
 - Kerala (most affected)
 - Parts of Karnataka and Tamil Nadu

Symptoms

- Yellowing and flaccidity of leaves.
- Necrosis of leaflets.
- Poor root development.
- Reduced flowering and nut setting.
- Progressive decline in yield.



Impact

- Severe **economic losses** to small and marginal coconut farmers.
- Infected palms act as **permanent reservoirs**, aiding disease spread.
- Threatens sustainability of coconut-based rural livelihoods.