



Institute for Ecology and Livelihood Action

Comments on the Forest Conservation Amendment Bill 2023

In order to frame our comments in the proper perspective am relying am going to basics. These are spelt out as follows

A. The underlying assumption that development as usual will continue and conservation will follow needs to be seriously questioned for the following reasons.

i. Global consensus (including India) is moving towards the phasing out of coal. In the context that coal is predominantly found in forested regions of the country, this should upfront provide a yardstick as to how we want to address the question of Forest Conservation.

ii. While the potential of renewable energy to replace coal is being done, it is being done with the development/business as usual model in mind. The relevance of renewable energy combined with the potential of internet/mobile and Geo-spatial tools for revitalizing decentralized governance incorporating the potential of local value addition to considerably reduce transportation and hence provide a qualitatively different approach to examining current growth models related to infrastructure development and related energy demands.

iii. The technological advancements listed above, provide the space for examining real time participation of local communities in governance provided, scientific tools of analysis can help local communities examine the relevance of local knowledge and tradition for which a break has to be made in the current class room methods of teaching, instead going for field lab methodology where local communities can overlay multidimensional field observations in historical, social and geographical transects to understand issues related to sustainable development, appropriate local value addition that takes into account nature's cycles and relevance of this for livelihood protection before being overawed by promises of jobs, productivity enhancement which bring in its wake steep costs to the local communities.

B. Due to India's unique geographical location, it has a rich diversity perhaps unparalleled in the world in terms of the diversity of habitats it can support. Historical injustice referred to in the preamble of the FRA is due to the fact that we have failed as a nation to recognise the relevance of this diversity and associated with it the diversity of culture and life support systems that come with it. The paper *Relevance of the Ecosystems Approach for Sustainable Livelihoods: A Plea for Community Ecosystem Evaluation methods: Case studies from Rajasthan, Gujarat, Maharashtra and elsewhere* by IELA provides an indication as to how this can be done. http://ielaind.org/wp-content/uploads/2017/05/Valuation-of-Ecosystems_-IELA_Habitat_Case-studies-from-different-States.pdf

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C. The destruction of forests is coming in many forms and each brings with it destruction of the life support systems that communities depend upon. The documentary Parvat Pir Si by Subrat Sahoo for instance brings out the impact of the short sighted approach to infrastructure development namely the creation of hydroelectric power in the hill State of Himachal Pradesh. How the neglect of the relevance of pastoralism is leading to such wanton destruction has been brought out in numerous studies. Studies in Uttarakhand for instance highlight how the replacement of Oak forests with Pine have resulted in ecological instability due to reduction in water retention capacity, loss of soil health and resultant destruction of springs, landslides, increase in forest fires etc, In Andhra, Telangana as elsewhere how plantation of eucalyptus to feed the paper mills has resulted in the loss of biodiversity and consequent livelihood support systems is well known, The destruction of mangroves due to the short sighted import/ export and development policy which gives more importance to the development of ports and urbanisation instead of looking at the concerns of small and marginal fishers and even pastoralists that depend on these resources apart from its relevance in controlling sea ingress, impact of cyclones etc. Crores of rupees are being pumped to mitigate these impacts but studies have shown that apart from issues related to corruption they come with other side effects. Even now impacts of destruction of forests and alienation leading to severe cases of malnutrition have not been able to be successfully countered by the development, health and nutritional programmes of the government.

D. The policy of alienation people from the forests, begun in real earnest by the British (even earlier incidences are there) and continued with greater ferocity after the Forest Conservation Act 1980 (to which BD Sharma as tribal Commissioner effectively replied to), has resulted in the increase of mafia activities to destroy the forests. These incidents and in particular man made fires have increased sharply following the Forest Rights Act as a means to mislead/ misguide local communities about the true significance of the Act in terms of establishing the relevance of forest based livelihoods in general and role of women in the conservation and development of the natural resources in particular.

E. The relevance of forest foods, medicinal plants is being promoted with a view to commercial exploitation of the forests (in control of corporations) rather than as a concrete programme that could help stabilize the lives and livelihoods of rural communities dependent on the forests. Forest rich States like Chhattisgarh, Uttarakhand have chosen to woo Corporates to exploit the minor forest produce available rather than depend on the strengths of local communities which could be further enhanced by appropriate local value addition processes.

F. Fragmentation and monoculture plantations etc have given space for invasive species to grow and flourish. With the alienation of local communities who once nurtured the forests conducive to their life support systems, forced migration and lack of attention to the forests have resulted in uncontrolled expansion of these invasive species. It is impossible to overturn this tide without recognition of the relevance of local traditional practices in protecting and maintaining the diversity of the forests. The Brandeis approach to the forest ignores the importance and relevance of the traditional knowledge of these communities.

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In short there is a need to decolonise the impact of the Forest Act 1927 and the Forest Conservation Act 1980 on the foresters and forest department of the country. Certainly those officers seriously concerned about the biodiversity and forest wealth of the country have in their own way tried to recognise the relevance of local communities in the preservation and conservation of the natural resources of this country. The Colonial/ Western based approach to forests and Forest conservation and development must stop if we are to seriously make a dent on the real issues related to conservation and its relevance to the local communities that have survived on them for centuries. The paper **A Participatory Approach for Integrating Community Knowledge in Ecosystem Assessment : Relevance of Geo-spatial tools to enhance Community Participation: Case Study of Ashankur** by IELA and Ashankur team provides a road map as to how real time participatory Ecosystem Assessment can be facilitated with the help of Geo- Spatial tools. http://ielaind.org/wp-content/uploads/2017/05/A-Participatory-Ecosystem-Assessment-of-issues-in-Ahmednagar-region_Relevance-of-Geo-Spatial-tools-to-enhance-community-participation.pdf

All India Forum for Forest Rights Struggle following a study done on the Status of implementation of the Forest Rights in 11 States came out with a set of five policy briefs on how the implementation of the Forest Rights Act could be strengthened in different ecological systems having focus on communities dependant on those systems.

<http://ielaind.org/wp-content/uploads/2017/05/AIFFRS-Policy-Brief-1-Overview-of-status-of-FRA-and-Way-forward.pdf>

http://ielaind.org/wp-content/uploads/2017/05/AIFFRS-Polcy-Brief-2-Perspective-on-Mangrove-Forests_Rights-of-Fishers-and-other-Forest-Dwellers.pdf

http://ielaind.org/wp-content/uploads/2017/05/AIFFRS-Policy-Brief-3-Perspective-on-Pastoralism-_-Case-study-of-Himalyan-Region.pdf

<http://ielaind.org/wp-content/uploads/2017/05/AIFFRS-Policy-Brief-4-Protected-Areas-and-Sanctuaries.pdf>

http://ielaind.org/wp-content/uploads/2017/05/AIFFRS-Policy-Brief-5-Perspective-on-Forest-Dependent-Communities_Case-study-of-communities-issues-strictly-not-coming-under-FRA.pdf

These have submitted to the Ministry of Tribal Affairs along with report and briefing notes in August 2020 . <http://ielaind.org/wp-content/uploads/2021/01/Note-for-the-Tribal-Minister-for-discussion-on-16th-August.pdf>

We trust these inputs will be sufficient for an entirely radical look at Forest Conservation, one that keeps the people of this country in the centre.

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