



Institute for Ecology and Livelihood Action

Shri Noyal Thomas
Dy Inspector General of Forests (Forest Policy)
Government of India
Ministry of Environment & Forests and Climate Change
Forest Policy Division
Indira Paryavaran Bhawan
Vayu Wing, 6th Floor
Jor Bagh Road, Aliganj
New Delhi 110003

Subject : Draft National Forest Policy dated 14th March 2018-03-24

Dear Sir,

We have read with interest the new draft National Forest Policy and note the reference to increase in forest cover as a result of implementation of the 1988 National Forest Policy. We would also take the opportunity to mention what is not stated here, namely that the moment, the issue of benefit distribution questioned the right of communities to get the benefit of their labour, the interest of communities in the protection process received a big setback. We would also like to note that the deafening silence on FRA 2006 and the relevance of CFR for this process.

We would also like to point out here that while commemorating 10 years of the Act, members of civil society expressed their concern and alarm that only 4% of the total potential of the lands to be recognised under the Act had actually been done. Of more concern was the focus on IFR primarily which destroys the spirit and essence of the Act namely that the recognition of rights of Forest Dwellers is distinct from the process of granting individual pattas for cultivation. It is what brings upfront the essence of the injustice done to forest dwellers and forest dependent communities, namely the life support system drawn from the forest.

There is a need to acknowledge upfront that the focus on conservation has in no way taken away the commercial orientation of the Forest Department, the prime cause behind the decimation of the forests. Eco- Tourism is being promoted as a win-win situation and the resultant mushrooming of tourist resorts in and around sanctuaries is turning out to be not only an eyesore but a major threat to the wildlife we claim to want to conserve and protect. The impact on livelihoods of local communities is not only marginal in terms of livelihood generation, it is in fact negative as sanctuary after sanctuary is sought to be closed to the resident community denying them their basic livelihood needs.

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On the other hand, the rule of law is flouted with impunity to divert forests for so called 'development' projects. The increasing conflicts with local resident communities dependent on forests across the country are a reflection of this. The Supreme Court ruling on CAMPA funds reflects the growing concern that offset measures are merely a ploy than an actual solution to the need to maintain forest and vegetative cover. Ignoring the essence of this concern, the Government cynically passed CAF in 2017 providing a way out to governments to misuse the money in the name of afforestation, green cover, and climate change ignoring the requirements of local communities rather further alienating them instead.

If we do not want this policy to turn out to be the sham that it is, we ask you to seriously consider the suggestions given by us below.

- a. FRA and in particular CFR must be implemented in letter and spirit and for this Communities need to be empowered, this includes recognition of traditional wisdom.
- b. Productivity orientation is a typical commercial orientation to the forest which has resulted in its decimation in general and the focus of commercial trees in particular. The comprehensive outlook recognised by the local communities need to be brought up front.
- c. The failure of CAMPA as an offsetting mechanism and the need to engage seriously with local communities to find the appropriate development path consistent with ecology and livelihood needs.
- d. The need to make the prime task of the National Community Management Mission, the facilitation of a rejuvenation process (correcting historical injustices along the way) so that communities can develop and manage their own forests we welcome it. It will become counterproductive at this stage if the Mission is made an adjunct of the Forest Department rather than seeing how it can work closely with the Ministry of Tribal affairs and other related departments as to how the letter and spirit of FRA can be implemented.
- e. The clause related to Private participation in forests needs to be deleted. It is our contention that proper engagement with communities will considerably bring down the costs of rejuvenation and management of the forest rendering funds from the Private Sector redundant.
- f. Need to develop people's science modules for eco restoration keeping in mind livelihoods and sustainability issues. Deep historical study of the vegetation and related social and economic equations that were its part will form an intrinsic part of such initiatives.
- g. Live engagement with people's representatives and those from civil society and people's organisations should be made an intrinsic part of the policy framework.

Thank You

With regards

Viren Lobo

Managing Trustee

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