



# **WILDLIFE FIRST**

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04.04.2018

### **VIEWS/SUGGESTIONS ON THE DRAFT NATIONAL FOREST POLICY, 2018**

#### **Introduction and Background:**

Wildlife First has been involved in conservation of forests and wildlife since 1995 and was nominated to the National Board for Wildlife (2007-2010). The second undersigned trustee represented Wildlife First on the NBWL and a sub-committee of the NBWL on the Compensatory Afforestation Fund Bill 2008 and the Wildlife (Protection) Act, 1972. He was also a member of the Boundary Rationalization Committee and NTCA site evaluation committees.

Based on a careful analysis of the draft policy, we are submitting the following specific policy suggestions that are, in our considered view, extremely crucial for long-term conservation of forests:

It is requested that the Ministry of Environment, Forests and Climate Change considers these policy suggestions objectively and ensures that the draft policy is properly recast in larger national interest.

#### **Summary:**

The draft National Forest Policy 2018 disappoints on several counts. Despite the advancement of scientific knowledge since 1988 when the current National Forest Policy was adopted, and overwhelming data on the massive threats that forests face, **the draft policy is bereft of knowledge-driven solutions that have the potential to balance the competing needs of conservation and development.** Furthermore, **failed ideas like compensatory Afforestation, catchment area treatment and Joint Forest Management** have been included in spite of massive evidence **on failures documented by the CAG, parliamentary committees** and other independent assessments. There is also the addition of a new and **dangerous idea called "Enrichment of dense forests", which will lead to hitherto untouched forests being tampered with.** Where is the need to "enrich" already "dense forests"? Such "policy prescriptions" are nothing more than **seeds sown in the policy for more corruption-ridden projects** to be included in Working Plans and Schemes and certainly not in line with the **Government's avowed commitment to Good Governance.**



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## **SPECIFIC SUGGESTIONS ON DRAFT NATIONAL FOREST POLICY 2018**

### **1: Move from Compensatory Afforestation to a Landscape/Ecosystem Regime**

*The following policy important suggestion may please be included in Para 4.1.1 which lists various strategies to reduce threats:*

**Forest fragmentation** - the breaking up of large blocks of forests into smaller patches due to ill planned intrusion of developmental projects is one of the most serious threats to long-term conservation. Peer reviewed scientific research has clearly established that fragmentation has devastating impacts - it disrupts landscape connectivity, creates new edges, eliminates rare species and leads to steady degradation of habitat and increased human-wildlife conflict. Specific policy prescriptions are necessary to address this vital issue and enable a fundamental change towards a scientific landscape/ ecosystem approach that is anchored on minimizing fragmentation of large blocks of contiguous forests.

**The policy must therefore clearly emphasize the need for consolidation of the remaining blocks of large forests** by eliminating / minimizing fragmentation, or honey combing, through strategies that inter alia include: strategic acquisition of thickly forested leased lands/private owned deemed forests within contiguous forested landscapes, establishing forest connectivity over a wide altitudinal range. This is crucial to mitigate the impact of climate change and for securing wildlife corridors. A large part of the CAMPA fund must be applied for various forest consolidation activities/projects and **not wasted on raising plantations.**

### **2. Minimizing indiscriminate diversion of forest land and instituting new monitoring conditions and mechanisms**

*The following policy suggestions are with reference to **Para 2.7** which is part of the guiding objectives to reduce diversion and improve compliance of conditions:*

**The forest conservation policy will also have to address the unbridled grant of forest land** for development projects, which cause fragmentation. In order to ensure a pragmatic balance between conservation and development we suggest that the policy must prescribe that: **proposals for diversion of forest land amidst large forest blocks and/or forming part of a contiguous forested landscape - irrespective of the area sought – shall ordinarily not be considered**, by applying the **principle of avoidance**, unless it is of **great National importance**. However, in scattered / small pockets of forests that do not form part of a large forested landscape or wildlife corridor or an important wildlife niche / wetland etc., policy amendments can be considered for a more enabling fast track forest clearance regime.



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**Brand new Monitoring mechanism:** Monitoring of conditions is the weakest link in the forest clearance process. The loopholes in the current regime - including the current on-line forest clearance system - give ample scope for exploitation by unscrupulous project proponents in collusion with authorities involved. Since most violations are clearly intentional, without timely detection, as is the situation now, there is little or no scope for rectification later. We therefore suggest that this important lacuna is appropriately addressed by a policy prescription of a four-stage monitoring process –

- i. Commencement** of breaking/clearing/marking/foundation stage of the project;
- ii. Continuous** – during all key identified project milestones;
- iii. Periodic** – annual / six months based on nature of the project; and
- iv. Surprise** - at-least 10% of cases including those where complaints or news reports of violations have been received / observed; must be made mandatory

The policy must also encourage the transfer or mutation of non-forest land immediately adjacent to RFs/PFs and/or within enclosures of RFs or PAs/Tiger Reserves or in areas forming important wildlife corridors. It must be emphasized that States must ensure this before granting State II clearance to project proponents.

### **3: Improving Forest Cover and consolidation of habitats /corridors:**

*The following policy suggestions are with reference to **Para 2.8, 4.1.1(b) & (e)** for increasing forest cover and afforestation:*

Instead of the current approach on compensatory Afforestation which relies primarily on raising plantations, “Enrichment of dense forests”, assisted regeneration, planting of suitable trees and grass in river catchments etc., **the forest policy must usher in a fundamental change of (i) identifying areas where forests stand degraded but contain root stock and (ii) those legally notified forests which have been completely mined / ploughed etc.** In case of degraded forests with root stock, only policy prescriptions of natural recovery based on strict protection must apply. This is extremely important to ensure that we recover natural forests that are degraded and not create monoculture plantations with exotic trees in such degraded forests/ natural scrub forests/ natural grasslands as is being done now. This will also reduce the burden on the exchequer and ensure that the large 55,000 crore CAMPA fund governed by the CAF Act, 2016 is not squandered away on ecologically damaging *pit and plant* afforestation projects in such degraded forests, which can recover with just protection.

The Policy must unambiguously clarify that Plantations shall be only in: (i). mined / ploughed areas; (ii). completely damaged / modified areas where natural recovery is not possible; (iii). forest lands already under Forest Development Corporations; (iv) and privately owned lands where agro forestry projects benefit farmers as well.



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## **4: Commercial extraction of NTFPs**

*The following policy suggestions are with reference to **Para 4.1.1 (e)** on NTFPs:*

Even though well-researched data has established that commercial extraction of NTFPs has resulted in dangerous over-extraction and can no longer be considered sustainable, the draft policy regrettably is advocating promotion of "market oriented approach embedded in sustainability" as part of business plans. **We strongly submit that the National Forest Policy must promote conservation of forests above all else. We urge a complete rethink and recast of the policy to promote NTFP for business under the veil of "sustainability"**. This is a hugely retrograde policy prescription not backed by any credible data on sustainability. It appears to be promoting the interests of certain large business houses aggressively marketing natural *desi* remedies, which is resulting in grave overexploitation and degradation of forests, as well as destruction of the resource itself.

## **5: Wildlife**

*The following policy suggestions are with reference to **Para 4.3** on wildlife:*

One of the most important management interventions for Protected Areas (PAs) is Voluntary Relocation of people and notification of PAs as Critical Wildlife Habitats. **Even though wide ranging individual and community rights have been granted over a whopping 50 lakh hectares of forest land including PAs, causing massive habitat loss and fragmentation, not one hectare of Critical Wildlife Habitat has yet been notified. It is therefore vital that both the forest and wildlife policies address this threat squarely.** Furthermore, in many areas, even though people are increasingly demanding resettlement voluntarily, the response of the Government has been rather poor. **We therefore submit that the policy must highlight the need for voluntary relocation from PAs for which funding from the CAMPA fund can be allocated as provided under the CAF Act 2016.**

**We urge that the policy prescription of "restoring habitats" must be qualified to restrict it to natural restoration only with protection measures. Huge ecological damage is presently being perpetrated due to year-on-year funding to State Forest Departments through approval of poorly drafted Management Plans without due scrutiny; These are packed with unnecessary but highly lucrative civil works and earth moving proposals such as water retention trenches, excavation of feeder drains, check dams, enrichment planting, water harvesting structures etc. It is time to stop the destruction of natural forests caused by such un-scientific policy prescriptions which are also **sowing the seeds for more corruption-ridden projects to be included in Working Plans and Schemes and certainly not in line with the Government's avowed commitment to Good Governance.****

Sincerely

**K.M. Chinnappa / Praveen Bhargav**  
Trustees