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14<sup>th</sup> April 2018

Delhi

To  
Shri Noyal Thomas  
Dy. Inspector General of Forest (Forest Policy)  
Government of India  
Ministry of Forest, Environment and Climate Change  
Forest Division  
Indira Paryavaran Bhavan, New Delhi 110003

Sub: The Review of Draft National Forest Policy, 2018.

Dear Sir,

This written representation is in relation to the recently formulated Draft National Forest Policy 2018. We would like to draw your attention to the plight of tribal communities and other marginalized communities who will be most impacted by commercialization of forest.

Ninety percent of the Scheduled Tribes predominantly live in forest areas and intractable terrains and 95% of them are below poverty line and totally depend on forest, agriculture or agriculture based activities. Most of them turnout as migrant construction labor due to their displacement for the so-called exploitation of minerals and other development projects.

With this background we would like to state some of our concerns on the Draft National Forest Policy, 2018.



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The Draft NFP 2018 is self-contradictory as on one hand it aims at using forest to mitigate climate change and on the other hand places more than required emphasis on the commercialization of forest which is a major threat to climate change mitigation. Since the ratification of Paris Agreement, India has promised to create an additional carbon sink. For this India has to increase its forest cover from 24% to 33%. The Draft Policy mentions about the efforts to increase the forest cover. However the Draft does not make a difference between the forest cover and tree cover. What the draft believes to achieve through afforestation is increase in tree cover and not forest cover. By focusing on this the Draft Policy emphasizes on monoculture. This can lead to major disturbance in the local ecology. For instance- studies have shown that the plantation of eucalyptus in the name of afforestation has depleted groundwater in Arkavathi Basin, which led to fall in water supply in Bengaluru. Eucalyptus also has negative allelopathic properties- i.e. it does not encourage vegetative growth under its cover.

### **Section 3 and 4.1.1**

- The Draft focuses on the need to stimulate growth in the forest based industry sector and encourage forest corporations and industrial units. Commercialization of forest is a major threat to the forest dwelling communities and tribal communities. Most of the livelihood of these communities (350-400 million people) depends on NTFP's. The Draft Policy focuses on increasing the timber species which will lead to reduction in the NTFP's. It has to be remembered that forests are much more rewarding in terms of NTFP's than timber produce.



- Economic use of timber as emphasized in the Draft can be very dangerous- as there is no specification of how government can monitor the exploitation of the forest by the corporates.

### **Section 2.8 and 4.1.1**

- There is a lot of emphasis on afforestation. The policy read with CAMPA provides both funds and physical space for afforestation. However pushing non-indigenous "commercially important" invasive timber species to meet afforestation targets will damage local ecology and groundwater recharge. A recent report of CAG has pointed out that 50%-60% compensatory afforestation has not taken place. This needs a strong monitoring system. However the Draft Policy has no mention of monitoring of this mishappening.

### **Section 4.11**

- The Draft Policy is not in line with FRA and PESA which are protective legislations for the indigenous communities. The NFP should be a synergy of FRA, PESA, Forest Protection Act and Wildlife Protection Act. The Draft Policy does not elaborate on engaging local people in forest management. "Participatory approach" is vaguely used and needs more clarity and elaboration. Gram Sabhas should be made important decision makers in all matters concerning the forest and ecosystem.



### **Section 2.9**

- The policy states the extension of protected areas and corridors for maintaining the forest cover. However this proposal ignores the flaws in the exclusionary model of protected areas governance which has caused displacement of local population and dignity and rights violation.

### **Section 4.3**

- Strengthening wildlife conservation has been mentioned in the Draft Policy. In this it has to be a regulation on movement of private vehicles in protected areas and reduction of commercial resorts in the protected areas.

#### **Section 4.1.1 (a)**

- The Draft Policy does not consider mining as a threat to forest conservation. More than 50% of mining happens in forest areas and hence mining should be seen as a threat to forest ecosystem and proper regulations and guidelines should be issued.

#### **Section 4.1.2**

- Promotion of cultivation, harvesting, transportation and marketing of wood would be ensured “by relaxing the existing felling and transit regime in the country”. This provision in the Draft Policy will open window for illegal transportation of timber leading to high levels of corruption in the bureaucracy.



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The Draft Policy is a shift from tribal to timber. The Draft Policy aims at creating new 'zamindars' and turn the tribals into slaves. The Draft Policy will dilute the access of tribal community to the forests and disturb the natural ecosystem affecting the life and livelihoods of millions of people. The indigenous community should be made part of the mission to mitigate the effects of climate change and not be excluded from the process. The Draft aims at excluding the forest community from sustainability planning.

With these few points we would request the Policy to consider broader participation of the stakeholders.

## **About mm&P**

mm&P (mines, minerals & PEOPLE) is a growing alliance of individuals, institutions and communities who are concerned and affected by mining. The isolated struggles of different groups have led us to form into broad a national alliance for combating the destructive nature of mining.

Rebbapragada Ravi  
mm&P Chairperson

Ashok Shrimali  
mm&P Secretary General