



# DAKSHINBANGA MATSYAJIBI FORUM (DMF)

Trade Union Regn. No.20474/92. Affiliated to National Fishworkers' Forum (NFF)

Head Office: 20/4, Sil Lane, Kolkata – 70015. Phone & FAX: 033-23283989 e-mail: dmfwestbengal@gmail.com

April 14<sup>th</sup>, 2018

To:

Shri Noyal Thomas, DIGF, Forest Policy,

Shri Jitesh Kumar, Technical Officer, Forest Policy,

Ministry of Environment, Forest & Climate Change,

6<sup>th</sup> Floor, Vayu Wing, Indira Paryavaran Bhawan,

Jor Bagh, New Delhi 110 003.

Email: digfpolicy-mef@nic.in/jitesh.kumar@nic.in/toforestpolicy@gmail.com

Sub: Submission of comments on the Draft National Forest Policy 2018.

Sir,

Please refer to the communication resting with your office memo F.No.1-1/2012-FP(Vol.4) Dt. 13.03.2018 regarding invitation of comments/views/suggestions on the Draft National Forest Policy 2018.

Our comments on the Draft National Forest Policy 2018 are enclosed.

Yours faithfully,

Pradip Chatterjee,

for Dakshinbanga Matsyajibi Forum (DMF)

Mobile: 9874432773



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## Comments on the Draft National Forest Policy, 2018

### Overall Comments:

1. The draft policy fails to indicate the legitimacy of its evolution. In a democratic country like India the forest policy has been drafted without any consultation with the people of the country, especially without any official interaction with the forest dwellers.
2. The draft policy appears to be ignorant of the spirit and content of the laws of the country on forest, forest dwellers and forest management. It has miserably failed in building on the observations and directives of the Forest Dwellers' Rights Act as well as the Amendments to the Wildlife Protection Act in dealing with conservation and rights of the people dependent on the forest for their habitat and livelihood. It is retrogression to the colonial laws on forest management and a continuation of the age old policy of injustice to the forest dwellers. It is an exercise in “conservation without people”.
3. The draft policy attaches primary importance to commercial value of forest and to forest as a destination for investment. Thus it fails to consider forest as a repository of ecological services indispensable for the wellbeing of the society, natural environment and sustainable livelihood practices. It thus fails to consider inter-generational equity and continues to consider forests as means of present day economic growth and gain.
4. The draft policy commits an impermissible blunder by treating any tree cover as forest. Blinded by a drive to commercialise forests it attempts to enhance use of timber and wood as a means to increase the value of forests. It also tries to treat any tree cover including social forestry and plantations as forest, for the purpose of replacing forests with plantations and other efforts like social forestry with a view to subject forest land and trees to commercial use.
5. The draft forest policy fails to indicate linkages with land use policy, water policy, agriculture policy, animal husbandry, forest dwellers etc. As such it is not compatible with the social and governance structure of the country.

### Comments on the Preamble:

1. It is not true that “As a result of the implementation of the 1988 policy prescriptions, there has been an increase in forest and tree cover and reduction in the diversion of forest land for other land uses”- section 1.4. According to MoEF forest land diverted for non-forest purposes between October 1980 and July 2016 stands at 1.49 million hectares. The Forest Survey of India 2015 says that total forest area increased by 3,775 sq. km since 2013. In the same period, 2,511 sq. km of very dense and mid-dense forests were completely wiped out. Government sanctioned industrial ventures and infrastructure developments are the major contributors for annihilation of forest.
2. It is also not clear what has been indicated by the “low quality and low productivity of our natural forests” – section 1.4. The statement lacks context. Quality of natural forests are area specific. Productivity of a natural forest is not only area specific but also accounts for the ecological services of the forest. It cannot be compared as an industrial or agricultural enterprise. It appears that the statement hints at the commercial valuation of the forests.



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3. The preamble states the need for a new forest policy without pointing out the specific major areas where the earlier policy of 1988 has been inadequate for which a new policy is called for. Only stating that there have been changes in some sectors or there should be a new effort in forest management is not sufficient. The true purpose of the new policy is not apparent from what has been stated in section 1.5.

## Comments on the Goal and Objectives:

This section provides the space for proposing all good intentions and making tall promises. Even in this the draft policy appears to be hollow on two cardinal points –

1. It pledges to “Safeguard forest land by exercising strict restraint on diversion for non-forestry purposes, and strict oversight on compliance of the conditions”- section 2.7. It fails to indicate how it is going to be done when Government is the greatest agent for such conversions.
2. It talks to “Incentivize sustainability in community managed, community owned private forests and creating a sustained peoples' movement for achieving these objectives” – section 2.14. But it stops short of giving community ownership to forest dwellers in general. Thus exhibiting the colonial mistrust towards indigenous people in managing natural resources.

## Comments on Essential Principles of Forest Management :

1. Drive for “productivity increase” of natural forests – (section 3.1) smacks of extractive commercialization of forests.
2. Increase in productivity of forest plantations – (section 3.2) indicates same extractive policy orientation that will place the choice of species and management of plantations on commercial lines.
3. No role of local community is indicated in strengthening the “network of national parks, sanctuaries, conservation reserves, community reserves, biosphere reserves and important wildlife corridors and biodiversity heritage sites (Section 3.4).
4. LPG appears to be the only mentionable energy alternative (section 3.5). Bio-gas and solar alternatives are left out.
5. Non Timber Forest Produce (section 3.6) is not the property of the Forest Department, these belong to the forest dwellers. Any proposal to manage the same without the ownership and management by forest dweller communities is unjust and illegal.

## Comments on Strategy:

1. The new draft policy has registered a definite improvement over the policy of 1988 towards commercial exploitation and extraction of forest resources by dropping all references to diversion of forest land and the conditions or compensations for the same contained in section 4.4 of the earlier draft.
2. ‘Participatory Management’ mentioned in the draft Policy (section 4.1.1 (h)) appears to give a marginal role to the forest dwelling communities. It does not recognise the primary role of forest dwellers in the ownership, protection and sustainable utilisation of forest resources. Clearly Gram Sabha of forest dwellers and JFMCs created by the forest department are basically different and incompatible entities. To tag JFMCs with Gram Sabha means encroaching upon the rights of Gram Sabha.



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3. In the case of management of NTFP (section 4.1.1 (i)) it fails to mention that these are to be owned and managed by forest dwellers themselves. Thus, the present draft policy violates the law of the country and intends to further marginalise the forest dwelling communities.
4. By stating that “As far as community forest resources management under Forest rights Act is concerned, the new policy will address the same under participatory forest management and the same will be addressed through the proposed community forest management mission” (section 4.11) the draft National Forest Policy violates the Forest Rights Act 2006. It is a clear attempt to water down the rights of the forest dwellers in managing and protecting forest resources and sneak in through the proposed ‘community forest management mission’.
5. The draft policy talks of ‘Economic Valuation of Forests’ (section 4.2.2) . The eco-system services provided by a forest together with its socio-cultural contributions cannot be evaluated on economic terms.
6. The reference made to the Compulsory Afforestation Fund’ (section 4.10.3) appears to be naive and grossly inadequate. The fund together with the CAMPA Act should be questioned as they are the products of diversion of forest resources for big business. Also, they violate the rights of forest dwellers enshrined in the Forest Dwellers’ Rights Act of 2006.

## Conclusion:

The draft National Forest Policy is a retrogressive step as it has failed to improve upon the earlier policy and has watered down the core principles drawn and incorporated in it through a government and civil society exercise.

We urge upon the MoEF&CC to suspend the present draft National Forest Policy from further processing and take initiative to hold wide and in depth consultations with all stakeholders with primary emphasis on the tribal people and other forest dwellers before drawing a new draft policy.

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