

## SUBMISSION OF COMMENTS ON DRAFT ‘NATIONAL FOREST POLICY’

### 1. Background

Ministry of Environment, Forest and Climate Change has prepared a new [Draft National Forest Policy, 2018](#) with the overall objective and goal to safeguard the ecological and livelihood security of people, of the present and future generations, based on sustainable management of the forests for the flow of ecosystem services. The new policy also aims to bring a minimum one-third of India’s total geographical area under forest cover. The new draft policy adds several critical issues to the existing forest policy of 1998, such as commercial use of forest produce, creating jobs linked to forest conservation, encouraging private plantations, watershed development, and mitigating climate change impacts through forestry. CUTS International wants to submit a few suggestions and objections concerning the subject document.

### 2. Comments

Section	Comment/Suggestion
<b>Section 4.1.1 (b)</b>	Despite the existence of National Master Plan for Forest Fire Control, forest fires have increased over the years. While under the program, forest officials were trained, community participation in forest fire control remained minimal. The plan to involve the village forest protection committees remained on paper due to inadequate training and awareness generation activities. For communities living in forest adjacent areas are the most susceptible to forest fires. Hence, it is more important to train them to mitigate the damages. There should be some programmes, focusing particularly on the capacity building of fire fighting among the forest adjacent communities and prepare sort of community wildfire protection plans. This will help communities to take individual and collective steps to protect themselves.
<b>Section 4.1.1 (c)</b>	The title seems vague as it is talking about enhancing the quality and productivity of natural forests. The productivity of forest defined in terms of the maximum amount of volume that the forest land can produce over a given amount of time. Forest quality is used as an index related to this timber productivity. On the other hand, site quality refers to the physical and chemical attributes of a forested area, including its soil, topography and climate.
<b>Section 4.1.1 (d)</b>	This section speaks contradictory to the previous section. While previous section 4.1.1 (C) spoke of planting locally suitable

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	indigenous species, this section speaks of introducing commercially important species such as teak, eucalyptus and bamboo in the forest land. This will not only disturb the ecosystem balance, but also cause huge damage to the natural biodiversity. Commercial plantation of pine monocultures replacing natural oak forests in the Himalayas, teak plantations in natural sal forests of central India, and eucalyptus and acacia in the wet evergreen forests of the Western Ghats have had disastrous impacts on biodiversity and groundwater. In absence of strong laws, public private participation in commercial plantation will also undermine local livelihoods.
<b>Section 4.1.1 (f)</b>	While the National Forest policy, 1998 spoke of creating national parks to protect biodiversity, the draft policy doesn't speak of any such thing. The draft policy states that the protection of biodiversity will be undertaken in sync with National Biodiversity Act. However, in absence of any punishments or incentives preservation of biodiversity will remain more theoretical than realistic.
<b>Section 4.1.2 (a)</b>	The agroforestry has been declining significantly over the past few decades principally because of adverse policies, weak markets and a dearth of institutional finance. To reverse the trend and to coordinate, converge and synergise the different components of agroforestry, India adopted National Agroforestry Policy in 2014. Promotion of agroforestry in the draft policy is laudable as it has the potential to ensure dual objectives of environmental sustainability and economic growth by reducing pressure on forests, recycling nutrients, protecting ecosystems, increasing crop yields and increasing farm income. The only concern is the poor land recording system of India, which can eventually help the farm owners keeping all the profit without benefiting the local people.
<b>Section 4.1.2 (b)</b>	As more and more people move into the cities, the country is continuously losing its urban tree cover. Acknowledging the importance of urban greens in the policy document is the correct step. However, this needs to be complemented by a legal framework in order to avoid diversion of urban green cover for development projects. In that respect, it is important to coordinate with the Urban Development Ministry and integrate urban forestry in the city's development plan.
<b>Section 4.2.2</b>	While it is the right step to undertake economic evaluation of the

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	forests, Payment for Environment Services (PES) is one of the many different tools that can complement and stimulate an enabling policy environment for sustainable economic development. Farmers or landowners, who have agreed to take certain actions to manage their land or watersheds in the forest area to provide an ecological service should be rewarded through area based or product based schemes. Yakpugang community forest in Mongar, Bhutan is a successful model that can be replicated in that respect.
<b>Section 4.3 (a)</b>	The section speaks of identification of wildlife rich areas and corridors outside PAs but does not expand on this idea. It does not specify the identification and selection process, financing, or monitoring of these areas.
<b>Section 4.3 (g)</b>	This is one area where Public Private Partnerships (PPPs) can play a major role to build tourist infrastructures, such as stores, restaurants, eco-friendly lodges and tour guide agencies creating job opportunities for local people.
<b>Section 4.9</b>	Women across the nation are involved in forest management, directly or indirectly. Examples can also be found of different women groups who have taken initiatives to teach fellow local women different aspects of forest management. Different women specific training and awareness courses need to be developed to ensure not only their effective participation in the forest preservation, but also be the beneficiary of it. For example, awareness generation on medicinal benefits of various plants; scientific conservation training of medicinal plants etc. can be very useful for women upliftment.

**In Sum:**

The draft National Forest Policy was long overdue as the last revision took place in 1988. The latest policy takes into account the most defining feature of the today's reality —climate change. Many other key emerging issues such as soil and water conservation measures, economic valuation of ecosystem services, forest certification, national forest ecosystem management information system and early warning systems and methods based on remote sensing technology and community participation have been introduced. However, as this policy is going to be an overarching policy for forest management, it needs some more work. There are several key issues that are missed in the latest draft of National Forest Policy. For example, there is no reference to any green tax or any national stream revival programme. The need for adopting necessary measures to prevent the prevalent widespread forest



diversions is also surprisingly missing. Although novel, ideas like compensatory afforestation and joint forest management have not been successful in the past. Without careful analysis of the reasons behind its failure, mere reintroduction will not produce different result. It appears that production forestry” and plantations are the “new thrust areas of the Forest policy. There are still some gaps that need to be filled and functions that need to be elaborated before finagling the document and presenting it in the parliament. There is a clear need of careful analysis concerning the competing needs of conservation and development and it should require some more time. We look forward to these modifications and the revised version.

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*Established in 1983, CUTS International (Consumer Unity & Trust Society) is a non-governmental organisation, engaged in consumer sovereignty in the framework of social justice and economic equality and environmental balance, within and across borders. More information about the organisation and its centres can be accessed here: <http://www.cuts-international.org>*

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