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Executive Summary

For those who belong to urban spaces, and might have visited forest areas as tourists, the picture above would invoke the pristine beauty of nature, accompanied with a lamenting concern to preserve this beauty and biodiversity. This, in the words of John Berger, is understood as a “way of seeing”. Each way of seeing is affected by what a person knows or believes. As an outsider, this way of seeing would call for the forests to be left alone. This way of seeing is also ‘one’ of the multitudes of ways of seeing, and includes those of tribal communities who depend on forests for their livelihood, conservationists who want to protect forests and wildlife and see forest dwellers as ‘encroachers’, and the Indian State that has to accommodate all such perspectives while prioritising development. Which of these ways of seeing becomes dominant is an interesting study of the process of democracy in India, and a litmus test of upholding the values espoused by the Constitution.

With the Forest Rights Act, 2006, as the focus, the following Paper expands on:

- What forces led to the alienation of forest dwelling tribes from the forests
- How the Forest Rights Act, 2006 (FRA), with the aim of redressing the historical injustice to forest rights of tribals, came into being
- The challenges facing the Act’s implementation
- The larger opposition to the FRA by forest and wildlife conservationists
- How The Indian State can harmonise the concerns of forest conservation with the recognition of the rights of forest dwelling tribes and other-traditional forest dwellers.

In India, forests don’t just harbor floral and faunal biodiversity. From a socio-anthropological perspective, they are the abodes of the tribes of India, the last communities which represent a way of life different from the one brought about by private ownership of property and unsustainable mass production of goods.

Tribal life is characterized by common ownership of land and agrarian economic activity, which fosters egalitarian values in power relations and organizational system (Xaxa et al. 2014: 251). In India, almost 60% of the forest cover of the country is found in tribal areas (ibid 2014: 49), however, there are no official census figures for the forest dependent population. Different estimates put the figures from 275 million (World Bank 2006) to 350-400 million (MoEF 2009) (Nayak et al. n.d.: 5).

The Forest Rights Act, 2006, was enacted to recognize occupancy rights and the use of forest produce as a source of livelihood entitlements for the forest dwelling tribes and other forest dwellers. At the time, it was estimated that about 20% of government controlled and managed forestland will come under the occupational titles recognized under this law (The Ministry of Environment and Forests 2009: 18).

However, as per the latest Monthly Progress Report from November 2018, only 7.1% of the recorded forest area has been distributed as land titles to recipients under the FRA. Further, in the last 10 years, only 3% of the minimum potential of Community Forest Resource rights could be achieved (CFR-LA Dec 2016: 5). This paper investigates the challenges inherent in recognising forest rights, as well as the larger debate surrounding their implementation.

A Brief History

In the 19th century, tribal people in the Indian subcontinent co-existed with the forests, practising their livelihoods as Jhum cultivators, Hunter-Gatherers, Animal Herders and Settled cultivators. Their way of seeing the forest encompassed, not just a source of livelihood, but a home; a way of life in which both the forests and its inhabitants were in a sustainable relationship. Their stake in these forests was different from that of the British, whose foray into India changed how this relationship was to be ‘seen’ forever. As outsiders themselves, or Dikus, with the intention to commodify forest resources, the British usurped the autonomy of tribals over forest land. Commercial interest in the mass of timber wealth led to the conception of laws that changed the forests from being a common property resource, to being a state owned property (NCERT 2009: 39). Consequently, people from tribal communities were deemed as outsiders on their own land, and this “way of seeing” entered the legal and bureaucratic discourse.

In post-Independence India, unsurveyed community lands under the Princely States, zamindars and private owners were transferred to the Forest Department, declaring them as reserved forests, while no concrete attempt was made to secure forest rights of tribal
communities (Bose 2010: 7). In the late 1960s, there was a push for setting up national parks for tigers and other large animals by two social groups - first, a class of ex-hunters turned conservationists belonging mostly to the declining Indian feudal elite and second, representatives of international agencies, such as the World Wildlife Fund (WWF) and the International Union for the Conservation of Nature and Natural Resources (IUCN), seeking to transplant the American system of national parks on Indian soil (Guha 1989: 71). This led to the enactment of The Wildlife (Protection) Act, 1972, under which national parks and wildlife sanctuaries were established based on the fortress approach and deep ecology. This in-situ conservation approach was galvanised in India (Sahu 2019). National parks increased from 5 in 1970, to 98 in 2007 (38219.72 sq km), and further to 104 national parks in 2019 covering 40501.13 sq km. Wildlife sanctuaries increased from 62 in 1970, to 510 in 2007 (120543.95 sq km) and further to 550 in 2019 covering 119775.55 sq km (Bijoy 2017: 73). It has been noted that in this Western approach to conservation, the needs of the local population have not been taken into account. In many parts of Africa, for instance, designated wildlands are managed primarily for the benefit of rich tourists. In India with its long settled, agrarian based, and dense population, which has maintained a finely balanced relationship with nature, the setting aside of wilderness areas has resulted in a direct transfer of resources from the poor to the rich (Guha 1989: 71).

The issue of dispossession of tribal lands got a fresh perspective in the 1990s when BD Sharma, the then Commissioner for Scheduled Tribes and Scheduled Castes, identified the problem of non-recognition of tribal rights on land and forests as the main reason behind tribal unrest. His recommendations to the Ministry of Environment and Forests led to the issuing of guidelines by the Ministry for the regularisation of forest land rights. However, the guidelines were not followed up by states procedurally (Bose 2010: 17).

Meanwhile, in 1996, a public interest litigation challenging the lack of enforcement against commercial encroachers led the Supreme Court (TN Godavarman v. Union of India) to order stricter implementation of forest laws across India (Springate-Baginski et al 2009). The Apex Court declared all lands recorded as forests in Government records, and brought them under the purview of the Forest Conservation Act, 1980. Thus, land earlier recorded as scrub forests, areas of worship, sacred groves and small areas of Sal forests, which were categorized as common land, came under the control of the Forest Department. Due to these forest laws, tribal communities of Central India, who were forest owners, now became encroachers, and were often arrested and imprisoned for minor offences (Xaxa et al. 2014).

Consequently, in 1996, the Environment Ministry issued orders to remove ‘encroachers’ from forest land, leading to large scale evictions of tribal people. The uproar against these evictions gave a fresh impetus to the tribal rights movement in India, and led to the formation of the ‘Campaign for Survival and Dignity’ in 2002 which spearheaded the demand for the recognition of forest rights. Amidst the opposition by the Conservationist Lobby, which viewed tribal people as encroachers, the Forest Rights Act was passed in 2006. However, the Rules to implement the Act were notified only in 2008, due to opposition by conservationists, forest bureaucracy, and mining lobbies. The rules were further amended in 2012 (Bose 2010).
What does the Forest Rights Act Try to Achieve and How?

The intent of the Forest Rights Act (FRA) is to undo the historical injustice to tribals and recognise, not just their rights, but also give them responsibility in the management of forest land and resources, thus making them authoritative participants in forest governance (Bijoy 2017).

During the debate on the Forest Rights Act in the Lok Sabha on December 15, 2006, the then Minister of Tribal Affairs, P.R. Kyndiah, highlighted that:

“It is also true that the number of forest dwelling tribals whose land rights were largely denied for ages, for generations or since time immemorial and have not been recorded; as a result of which they were treated as encroachers and they were thrown out. They were the victims. Tribals living in forests suffer from a sense of fear psychosis. They are living with a sense of uncertainty that any time they might be evacuated. They are both psychologically and physically alienated” (Lok Sabha, n.d.).

To address this alienation and acknowledge forest rights, the act recognises and details in all, 14 rights of Forest Dwelling Scheduled Tribes (FDSTs) and Other Traditional Forest Dwellers (OTFDs) on forest land and its resources, for both individuals and communities, who have been occupying the forest land before December 13, 2005. These rights include – the right to hold and live in forest land, the right to use minor forest produce, and the right of conversion of Pattas or leases on forest land to titles and other community Forest Rights (Ministry of Tribal Affairs 2017-18: 65).

Gram Sabhas have been given the responsibility over the process of verification of individual and community claims to forest rights. To further safeguard these rights, Section 4(5) of the act clearly states that no member of a forest dwelling Scheduled Tribe or other Traditional Forest Dwellers shall be evicted or removed from forest land under their occupation till the recognition and verification procedure is complete. Further, if forest dwellers in areas designated as Critical Wildlife Habitats have to be resettled or have their rights modified, the free informed prior consent of Gram Sabhas has to be acquired regarding resettlement packages that ensure secure livelihoods (Bijoy 2017).

The FRA establishes a three tier body system - Gram Sabhas at the village level, Sub-Divisional Level Committee (SDLC) and District Level Committees (DLC) to receive and verify claims on forest lands. The Gram Sabha is the first body to receive and verify claims and pass a resolution for the same to the SDLC, which further passes it to DLC whose decision is final and binding. The law also permits the claimant the right to appeal against the decisions of these bodies in the same hierarchy. In the process of examining Claims, Gram Sabha is also assisted by a Forest Rights Committee, which is notified under the Rules of the FRA and constitutes members of the Gram Sabha.
The three tier structure for complaints and trials regarding the FRA.

The FRA in the Supreme Court

After the notification of rules of the FRA in 2008, cases were filed in various High Courts by Retired Forest Officers Associations challenging the constitutional validity of the Act. In January 2015, the Supreme Court of India transferred, to itself, all such cases in the various High Courts, and the matter is currently pending there (Bose 2010). On February 13, 2019, the Supreme Court ordered evictions of tribals whose claim to land under the Forest Rights Act had been rejected so far. The order was based on affidavits filed by states on the implementation of FRA. In the light of concerns that due process was not followed by states in verifying and rejecting claims, the Union Government filed a review petition in the Supreme Court. The order to evict was stayed on February 28, 2019, and the next hearing is planned for 10 July 2019. Meanwhile, states have been asked to review the rejection of claims and give a final report on the same by the next hearing date (Rajagopal 2019).
Implementation

When former Prime Minister, Manmohan Singh, had introduced the Bill of the FRA on December 13, 2005, he made a statement that “By this Bill the dispossessed tribals would become again possessed” (Lok Sabha, n.d.).

10 years since the conception of the Act, however, state governments have displayed an inertia in following due process. Monthly progress reports by the Ministry of Tribal Affairs reveal the high rejection rate of claims on land, while ground reports by researchers shed light on the half-hearted implementation of the FRA.

As on November 30, 2018, out of the total claims filed, land titles have been distributed in only 44.83% of the cases, with the top 3 states being Odisha (68.52%), Kerala (65.54%) and Tripura (63.34%), and bottom 3 states being Goa (0.25%), Bihar (1.51%) and Karnataka (5.71%) (Ministry of Tribal Affairs 2018). With a forest area of 38,000 sq km and 6665 claims filed, Uttarakhand has a 0% title distribution, as the process of granting forest rights has not even started in the state. However, it is interesting to note that Government Departments and hotels have encroached in the revenue and forest land area around the Jim Corbett tiger reserve in the state (Department-related Parliamentary Standing Committee on Science & Technology 2019: para 9.29). Further, out of the total claims filed, the total rejection rate reported is 45.90%. The rejection rate of more than 50% has been recorded in 8 states - Uttar Pradesh (80%), Uttarakhand (73.5%), West Bengal (67.98%), Karnataka (64%), Maharashtra (61%), Madhya Pradesh (58%), Bihar (52.5%), Chattisgarh (50%) (Ministry of Tribal Affairs 2018).
As per the reply by the Minister of Tribal Affairs in the Rajya Sabha, Sudarshan Bhagat, the major reasons for the rejection of claims reported by state governments include; non-occupation of forest land prior to December 13, 2005, claims being made on land other than forest land, multiple claims, and lack of sufficient documentary evidence (Dalwai 2018). As per wildlife conservationist groups opposing the FRA in the Supreme Court, all rejections of claims of land recorded by the states implementing the FRA should be deemed as encroachments and swift action be taken (Gokhale 2019). They are of the view that due process has been followed, with Gram Sabhas themselves having rejected 14.77 lakh claims, as of September 2018. According to them, the high rate of rejection indicates that most claims are bogus, which can also be verified by satellite imagery analysis by other independent institutions (Wildlife First 2019).

However, ground reports reveal that the process of verification of claims has been, in many cases, arbitrary and has often violated the provisions of the Forest Rights Act:

- The FRA rules and guidelines make it mandatory for the verifying bodies to communicate the rejection of applications to claimants so that the latter can file an appeal against the decision within 60 days. (MTA, UNDP 2014: 37). However, ground reports reveal that claimants were not informed about this, and lost their opportunity to appeal as well. Ground reports also reveal the influence of forest officers and patwaris on Forest Rights Committees and Gram Sabhas in claim decisions, which is a violation of both the letter and spirit of the FRA. The DLC and SDLC have to record reasons, in writing, for the rejection of any claims, and not insist upon any particular form of evidence. However, in practise, either the reasons have not been recorded or are not valid under the law (Gokhale 2019).
• Research by Madhusudan Bandi in Chhattisgarh and Gujarat shows that the exclusive reliance on satellite imagery to settle claims has led to high rates of rejection. According to him, satellite imagery is unreliable as the sole proof of claims due to factors like vegetation and shifting cultivation (Mohanty 2019). However, Rule 13 details various evidences that can be taken into account for verifying claims, while clearly mentioning that a minimum of two pieces of evidence must be considered by the three tier bodies (MTA, UNDP 2014).

• Bandi also notes the callous attitude of NGOs which get funds to make tribal people aware of the law, and help them fill out application forms and pursue claims (Mohanty 2019).

• The biggest hurdle in the implementation of the FRA is the lack of human resources available within the tribal departments of states, which are the nodal agencies for the Act’s implementation, and therefore the continued reliance on forest bureaucracy on the ground (Kukreti et al. 2019).

The successful implementation of the Act depends on the awareness of the forest-dwelling tribes, the capacity building of Gram Sabhas and the initiative by the respective State Governments in ensuring that due process is followed.

**Why is the Dependence of Forest Dwellers on Forests for their Livelihood a Concern for the Future of Forests as a Whole?**

The continuing opposition to the FRA and its half-hearted implementation concerns, at the heart of it, larger conflicts in ways of seeing forest management. Wildlife conservationist groups advocate a deep ecology and fortress approach to forest conservation, based on which national parks and wildlife sanctuaries, a form of inviolate forest territories, have been established in India. This approach of conservation excludes the symbiotic relationship between human beings and nature, and the former's dependency on forests. It sees them as encroachers and tries to limit their presence and activity in forest areas, in order to conserve forests and wildlife.

So what is the real picture? How much truth is there in the claim that the presence of tribals in forests in a threat to the latter. These fears, with respect to tribal inhabitation of forests, are not unfounded.

Granting forest rights in scattered parcels of forest land leads to habitat fragmentation, or breaking up of large forest blocks into smaller pieces. Fragmentation has been scientifically established as the most serious threat to long-term conservation of forests and biodiversity (Wildlife First 2019). Further, activities in and around forest areas, like grazing, shifting cultivation, collection and selling of minor forest produce, create anthropogenic pressures on forest resources in an unsustainable manner which contributes to forest degradation. Shifting Cultivation is reported as one of the major reasons for the degradation of forests in North-East India. Furthermore, different estimates for area under shifting cultivation ranges from 5 million hectare to 11.6 million hectare, involving 3 to 26 million people in 16 different states across the country.
Similarly, overgrazing due to increasing livestock adversely impacts the regeneration capacity of forests. The incidence of grazing is estimated to affect 78% of India’s forests. The large livestock population also results in huge collection of tree fodder. The annual requirement of dry and green fodder is estimated to be 569 MT and 1025 MT, respectively, against the availability of 385 MT and 356 MT.

The collection of firewood for sale in the market, though illegal, is also extensive in many forested regions in the country, and constitutes a source of livelihood for 11% of the population (Nayak et al. n.d: 5-6).

**Other Threats to Forests and Wildlife**

Though Shifting Cultivation and biotic pressures are listed as reasons for forest degradation, the Status of Forest Report 2017 also notes diversion of forest lands for developmental activities, as the reason for forest degradation (PIB News 2018). However despite the practice of land acquisition for development purposes, no consolidated government data exists regarding private land acquired, as well as Common Property Resources and forest land diverted for development projects (Xaxa et al. 2014: 263).

As per the Standing Committee Report on ‘Status of Forests’ from 2013-14 to 2017-18 under the Forest (Conservation) Act, 1980, approval has been granted for a diversion of 70920.61 hectares of forest land for non-forestry purposes (Department-related Parliamentary Standing Committee on Science & Technology 2019). The Xaxa report says that from the period of 1951-1990, in 13 states, 37.55% of common and forest land was taken for development projects (Xaxa et al. 2014: 263).

As per the reply by the Ministry in the Rajya Sabha, as of December 13, 2018, the total forest area diverted in the last 3 years (2015-18) for all non-forestry purposes like mining, irrigation and industrial purposes is 20314.12 hectare or 203.14 sq km, with the top 3 states being Telangana, (5137.38 ha), Madhya Pradesh (4093.38 ha), and Maharashtra (1159.68 ha). For the purpose of mining alone, the top 3 states in forest area diversion are Odisha (3014.56 ha), Chattisgarh (500.09 ha) and Madhya Pradesh (443.13 ha)(Lakshmanan 2018). It is to be noted that Odisha, Chhattisgarh and Madhya Pradesh are also the states with substantial tribal populations and with one of the largest forest covers in terms of absolute area (Xaxa et al. 2014: 49).

The argument for the fortress approach towards conservation takes the focus away from other visible threats to wildlife. In India, between 2014 and 2016, a 52% increase in poaching and wildlife crimes has been observed, with over 30,382 wildlife crimes and mortality recorded till December 31, 2016 (Kiran et al. 2017). The trend of constructing linear infrastructure projects through protected forest areas leads to fragmentation of forest land and increasing deaths of wild animals. As per the Minister of Environment, Forests and Climate Change’s own admission in the Parliament, the traditional corridors of elephants and their
habitats have been fragmented due to utilization of forest land for agricultural purposes, development works like hydro-electric power process, irrigation dams, canals, transmission lines, rail lines, and roads (Kumar 2018). Furthermore, 298 elephants have died in India from 2015-16 to 2017-18 due to reasons like poaching, electrocution and train accidents (Haque 2019).

**Forests and Forest Dwelling Communities: A Mutually Beneficial Relationship**

As a solution, it is the forest dwelling communities themselves who can be made the van-guards of forest and wildlife conservation, if their rights and relationship with the forest are first recognized and guaranteed.

For instance, Niyamgiri and Athirapally, both high-value biodiversity hotspots, were protected by communities against destruction using FRA’s legal protection (Sahu 2019). The Bishnoi Community in Rajasthan has also established how it is their ingrained cultural sensibility that led them to fiercely protect blackbucks against poaching. One can argue that the case of Bishnoi Community is exceptional because they worship the blackbuck for religious and spiritual reasons. However, the example of how Pangti Village in Nagaland was transformed from that of ‘hunters’ of Amur Falcons to ‘protectors’ of the same, shows the potential for community participation in protecting wildlife (Ghosh 2018). Van Panchayats in Uttarakhand, with powers over clearly demarcated community forests, are a form of community conservation system with legal sanction (Campaign for Survival and Dignity n.d.).

To strike a balance between forest conservation and tribal rights, it is not the number of people but their ‘consumption patterns’ in a forest that need to be managed (Sinha 2019). Gram Sabhas, under the Forest Rights Act, have not just been given community forest rights, but also the duty to protect forests, wildlife and biodiversity under section 5 of the FRA. Section 5(e) also provides a key power to “ensure compliance with gram sabha decisions concerning community forest resources”, potentially providing scope for a penalty clause (Campaign for Survival and Dignity n.d.).

However, despite this potential, the approach of the state on the ground has not been cooperative with forest dwellers. There are still reports of forest departments restricting tribals from accessing forest resources in national parks on grounds of protecting wildlife, as in the case of Panna National Park in Madhya Pradesh (Pandey 2016). There has also been an attempt by the MOEFCC to dilute the powers of Gram Sabhas with regard to forest clearance proposals (Choudhury 2019). Further, the creation of National Parks has resulted in alienation of rights and consequent displacement and forced migration of tribal people (Xaxa et al. 2014: 256). Subsequently, the Central Government has interpreted section 5, not as providing powers, but as imposing duties. The Rules make no reference to these rights, only a passing mention of the ‘duties’ of persons under section 5 (Campaign for Survival and Dignity n.d.). A key trend that has been observed in the implementation of FRA is that there is a
reluctance to recognize community forest rights over those of the individual (Bijoy 2017: 86). This is because they give the community the right to collect, own, use and sell minor forest produce. As per FRA Guidelines, the monopoly of the Forest Corporations in the trade of MFP in many States, especially in the case of high value MFP such as tendu patta, is against the spirit of the Act, and should henceforth be done away with (MTA, UNDP 2014: 39). The latest monthly status report on the progress of the FRA reveals that, out of the total community rights claims filed, titles have been distributed in only 48.57% of the cases (Ministry of Tribal Affairs 2018).

The Way Forward

There is a requirement of a paradigm shift in the approach to development, one which places more faith and investment in decentralised decision making with mutual respect for all stakeholders in the management of common resources. Further, as asserted by Geetanjjoy Sahu, tribal activists and wildlife conservationists need to work together (Sahu 2019). To jumpstart this, the FRA has to be implemented in letter and in spirit.

Elinor Ostrom and her 8 Principles of Management of Commons can lead the way. As per her research on how Communities manage common resources, (for which she also became the first woman to win a Nobel Prize in Economics in 2009) communities can engage in sustainable use of commons resources by laying down common rules and taking ownership of decision making. Her research reinforces the argument for community forest management with the claim that:

“When collective action is high, when forest users themselves monitor regularly, forest conditions get better; and when local groups have long-term rights and can harvest from a forest, they protect its conditions more.”

However, it is not the theoretical framework of community forest management alone that would bring desirable results. According to Ostrom, there is no one-size fits all approach to governance systems in forests. She acknowledges that no one entity - state, market, communities - can make the best decision. There is, therefore, a need to evolve polycentric systems of governance, with no arbitrary proportion on governance between local communities and governments, rather one which takes into account what suits the local and ecological conditions and social settings, while simultaneously empowering people. Her findings have countered Garrett Hardin’s “Tragedy of the Commons” approach, which places no faith in a community’s capacity for managing resources, and thereafter became an authoritative voice in promoting private ownership and capitalism (Mendez 2010).

However, as recorded by the Campaign for Survival and Dignity, which spearheaded the FRA from its inception to present times, forest management techniques like Joint Forest Management, in practice, allow Van Surakhsha Samitis to circumvent the decision-making powers of Gram Sabhas, and plantations under Compensatory Afforestation scheme do not
make reference to Forest Rights (CSD n.d.). On the other hand, Elinor Ostrom’s principles lay stress on ensuring that the decision making rights of community members must be respected by outside authorities (On the Commons n.d.).

Therefore, the discourse must shift towards implementing the FRA in spirit, and ushering forest governance that taken into account the rights and responsibilities of forest dwellers. As rightly submitted by TERI (The Energy and Resources Institute) to the Standing Committee:

> “Ecological security of the nation, sustenance and livelihood needs of the people living in and around forest have the first right on forest and any economic derivative is subordinate to these objectives” (Department-Related Parliamentary Standing Committee on Science and Technology 2019: para 10.17).

As per the reply by the Minister of Tribal Affairs while closing the debate on the Forest Rights Act, before Passing it in Lok Sabha on December 15, 2006: “It has been proved by statistics collected by the Forest Ministry that wherever there are tribals, there are dense forests in those places” (Lok Sabha n.d.). It is, therefore, time to harmonise tribals rights to forests along with forest management and effectively implement the Forest Rights Act in spirit.
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