

**Thiru A. Raja**  
Minister for Environment and Forests  
Paryavaran Bhawan  
CGO Complex, Lodi Estate  
New Delhi 110003

26 August, 2004

**Subject: Concerns regarding MoEF's Proposal "Biodiversity Conservation and Rural Livelihood Improvement in Forested Landscapes"**

Dear Thiru Raja,

We have heard that MoEF is proposing, for GEF funding, a project on biodiversity conservation and livelihoods through landscape planning, as a follow up to the India Ecodevelopment Development. Having read the proposal, we would like to point to the following serious concerns we have regarding the project:

- a. Planning of the project itself remains top-down, not involving the relevant communities;
- b. Mechanisms of integration of various developmental sectors, are weakly developed;
- c. Issues of the tenurial security of local communities, especially to relevant land, forest, and water resources, are not dealt with;
- d. The issue of livelihood security of people living *inside* PAs is side-stepped.
- e. Initiatives taken by communities themselves, to conserve ecosystems and wildlife populations, are not being integrated or learnt from;
- f. Essential elements of landscape level planning are weakly developed;
- g. The justification for large-scale funding from the World Bank is not clear, especially if sectoral integration is one of the objectives, for then enough money is already available within the Indian economy!

Each of the above concerns are elaborated in the attached note. We urge that MoEF seriously reconsider its application to the World Bank for this project. Instead, it should look for alternative, more sustainable, and participatory ways of taking up landscape level planning for conservation and livelihoods enhancement. In particular, we would urge the following steps:

- a. Opening up the process of planning for such a project, to public inputs, especially from the potentially affected communities and relevant civil society organisations;
- b. Ensuring that communities resident within protected areas are also brought into the fold, and that issues of customary/tenurial rights, unsustainable development processes, and community initiatives in conservation are also centrally integrated into the project;
- c. Exploring the possibility of putting together funds for such a project, from existing funds available with various line departments, including forest, rural development, tribal welfare, panchayats, watershed, and others (especially keeping in mind that without cooperation and 'buy-in' from these departments, landscape planning and management is impossible);
- d. Exploring much more acceptable donor agencies for the purpose, if at all it is felt necessary to raise some catalyst or seed money for the project from outside the governmental system.

We would be happy to provide additional inputs along the lines mentioned above, if need be.  
Thank you, with regards,

**(Ashish Kothari)**

**GEF Project Proposal on  
“Biodiversity Conservation and Rural Livelihood Improvement in Forested Landscapes”**

1. It is commendable that MoEF is considering moving from an exclusive focus on protected areas or specific sites, to a landscape or seascape level management strategy. This is undoubtedly an urgent need in India, as identified in a number of documents including the National Wildlife Action Plan, and the draft National Biodiversity Strategy and Action Plan.
2. Landscape level planning requires, at the very least, the following: (1) integration of the various sectors of planning and programmes relating to natural resources, including rural and urban development, conservation, and livelihoods; (2) central stake and involvement of citizens, in particular local communities and their representative bodies, as also of relevant civil society organisations and government departments.
3. However, the project concept currently under discussion, does not go deeply enough into these requirements, and therefore runs the risk of failing to meet the core objectives of achieving conservation and meeting the livelihood needs of resource-dependent communities. **In particular, the following shortcomings exist (elaborated separately below):**
  - h. Planning of the project itself remains top-down, not involving the relevant communities;**
  - i. Mechanisms to ensure the integration of various developmental sectors and departments, which are open and participatory, are weakly developed;**
  - j. Issues of the tenurial security of local communities, especially to relevant land, forest, and water resources, are not dealt with;**
  - k. The issue of livelihood security of people living *inside* PAs is side-stepped.**
  - l. Initiatives taken by communities themselves, to conserve ecosystems and wildlife populations, are not being integrated or learnt from;**
  - m. Essential elements of landscape level planning are weakly developed, some of them being absent;**
  - n. The justification for large-scale funding from the World Bank is not clear, especially if sectoral integration is one of the objectives, for then enough money is already available within the Indian economy!**

Each of the above points is elaborated below.

4. The project planning so far, including the formulation of this proposal, has not involved any local communities, or grassroots organisations working with such communities. This was a fundamental flaw with the initial planning of the India Ecodevelopment Project too, so it does not seem that we have learnt this lesson as yet. Any further work on this or other proposals should start with consultations and dialogues with relevant local communities (this has been rightly stressed in Section 6.5).
5. Component 2 of the proposal rightly stresses on the integration of biodiversity into various sectors. However, the issue of institutional mechanisms by which to ensure that such integration happens (e.g. river basin level coordination bodies, legal and financial means which ensure that all departments integrate biodiversity issues, and so on), is weakly developed. In addition, the vital importance of linking wild and agricultural biodiversity conservation across the landscape, is not dealt with.
6. The proposal rightly states (in the Background) that “local people, when rights and access are limited, often have little incentive to use natural resources in a sustainable way”. This is a very basic lesson of centralised, top-down conservation policies all over the world, and it is commendable that it is recognised at the outset in the proposal. The proposal also talks about achieving “social sustainability” (Section 6.3). Unfortunately, however, there is no operative part of the proposal that then goes into this issue, e.g. no mention of the need to secure rights and access to livelihood resources, or of the need to revive tenurial security to land and forests and link conservation to the creation of such stakes. There is also no mention of the role of customary laws and practices, traditional knowledge, and traditional village-level institutions of decision-making, all of which are vital ingredients of any community-based conservation strategy.
7. Component 1 of the proposal only talks about “local communities that live adjacent to” PAs. This conveniently side-steps the fact that most of our PAs have people living *inside* them. Given that it

is neither justified nor feasible to move most of these people out of their current settlements, or out of their dependence on the resources of the PAs, a way has to be found to integrate their livelihood needs and rights within the PA system. Whatever model is found, these few million people cannot be ignored in any landscape level management strategy!

8. By now we know of many hundreds of initiatives across India, in which communities have conserved ecosystems and wildlife populations on their own or with help from NGOs or official agencies. These need to be learnt from, especially in terms of how they integrate biodiversity conservation and livelihood security, and build in the above-mentioned aspects. Yet the proposal does not have any element of such learning, which would be vital to reach the objectives of the proposed project.
9. Landscape or seascape level planning and management requires coordination of various governmental sectors, joint work by government and civil society, large-scale mapping exercises, environmental impact assessments at the level of the entire scape (e.g. river basin level impact assessments), creation of landscape level institutional structures (e.g. river basin, or mountain range, authorities). These elements are weakly developed or missing from the proposal (relevant especially for Component 2 on “Mainstreaming biodiversity in production landscapes”).
10. One of the lessons of the India Ecodevelopment Project concerned the ability (or lack thereof) of the Forest Department in many PAs to spend large amounts of money in a productive manner. It is not clear whether this proposal has taken this lesson on board, for this issue has not been addressed in justifying the budget.
11. Any such project needs to be linked to developments on the panchayat front (including the relevant legislation), as also to work relating to the biodiversity action plan and law.
12. There is considerable experience of landscape level planning and management in other countries, including in some countries that have situations similar to India’s. The project should build in a component of learning from such experiences.
- 13. Finally, seeking World Bank funding for this seems totally unjustified. This is for the following reasons:**
  - a) It subjects India to conditionalities and pressure from external sources, reducing the chances of indigenous solutions and innovations to flourish.
  - b) If sectoral integration is being aimed at (a fundamental pre-requisite of landscape level management), then very substantial funding would become available for the proposed activities from the various better-endowed departments (e.g. Rural Development), obviating the need for large external funding. If on the other hand such integration is not aimed for or achieved, then landscape level planning will not work anyway, regardless of large external funding! (this point is missed out in Section 5.2 of the proposal).
  - c) If however any external funding is felt to be justified, e.g. as catalyst resources, the World Bank is the worst agency that this could be sought from. The Bank is globally known to be an agency whose overall funding to countries leads to serious environmental degradation and social disruption, and many of its projects in India too are criticised for this. Taking funds for such a project from this agency only helps to provide it a green cover it does not deserve.

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