

# Comments on ‘Draft Protocol /Guidelines for Voluntary Village Relocation in Notified Core/Critical Tiger Habitats of Tiger Reserves’

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## General comments

While the comments given below are on the specific issues this protocol deals with, it is important to place them in the context of other related documents, including the NTCA guidelines on identification and notification of Critical Tiger Habitats (CTH) of November 2007, the draft protocol on Critical Wildlife Habitats, and the draft protocol on tiger reserves. A number of issues are crucial here:

1. *Combine Relocation and CTH notification protocols:* Though this protocol is titled as if it deals only with relocation, it also has some provisions for the identification and notification of core/critical tiger habitats. This is confusing; either there should be a separate full-fledged protocol on the identification and notification of Tiger Reserves and core/critical tiger habitats, or preferably, ***the two should be merged so that all aspects relating to the Tiger Reserves including identification, notification, recognition of rights, determination of damage and options for co-existence, and relocation, are dealt with in one document. This has been done with the protocol on critical wildlife habitats.*** In any case, MoEF has not yet released a draft of a protocol on identification/notification of Tiger Reserves and core/critical tiger habitats, in the absence of which this protocol on relocation remains without a context and is incomplete.

2. *Basic principles:* In most Tiger Reserves, CTHs were notified in December 2007 without proper process of identification, study, and consultation. In general, all processes relating to tiger reserves (and other protected areas) need to be made much more knowledge-based, transparent and participatory, including full consultations with relevant Gram Sabhas and their consent for various decisions affecting them, inclusion of local knowledge systems and independent wildlife and social science research, and so on. Secondly, in tune with the changing focus of conservation worldwide and India's own obligations under the CBD Programme of Work on Protected Areas, there is a need to explore various models of integrated, inclusive conservation that include options for co-existence and co-management first and foremost, and relocation only where these are not feasible. A range of such options would present themselves as being scientifically valid, even for tigers.

3. *Outdated species centric approach:* Related to the above principles is the need to go beyond a species-centric approach that is evident in this protocol (or in the general approach to the tiger). Such an approach is contrary to current ecological approaches that argue for a more holistic and landscape approach as most ecological processes are linked on complex ways. The biggest problem associated with the continuing focus on the tiger is that declines in densities of other species might not be noticed or addressed, and such changes might in the long run affect the tiger. One example is the decline in bee densities that might affect pollination of large trees that could result in decreased recruitment and changes in forest structure affecting all species residing with these forests. The continuing focus on the tiger needs to be rethought and nuanced. Thus the emphasis in the guidelines in differentiating between CWH and CTH could be tempered by noting that these two areas are only legally different and that the differences are not ecological as is being suggested by the guidelines (see section 4.3).

4. *Recognition of (individual and community forest) rights:* It is not enough to say that recognition of rights is necessary before relocation. Firstly, in almost all protected areas, this recognition is highly delayed, and in many cases actively being obstructed by PA officials. Secondly, in many areas states have stopped the FRA process after dealing with claims to *individual* rights, whereas *community* rights have not been initiated or processed. MoEF in consultation with MoTA must issue a circular insisting on the full recognition of rights, both individual and community, as also processing of development facilities under Section 3(2) of the FRA, not only as a precondition to any proposal for relocation, but because this is now the statutory requirement under WLPA and FRA as legal entitlement of communities. Just as in the case of the July 2009 guideline of MOEF on diversion of forest land, this circular should instruct state governments to obtain evidence from the gram sabha on completion of the FRA process, and to obtain written consent on the relocation. Without this, relocation will always remain forced (see next point).

5. *Induced relocation is forced relocation:* While this protocol and other documents of MoEF/NTCA now explicitly mention that all relocation will be 'voluntary' and no force will be used, there is a widespread practice of *induced* relocation in which subtle and not-so-subtle pressures are put on communities in such a way that they *are forced* to ask for or agree to relocation. This includes continued denial of rights including obstruction in making claims under the Forest Rights Act, misinformation that they only have one chance to avail of relocation packages, and willfully withholding the information that communities have the option to stay on where they are *with* the rights recognized under FRA. Most communication to communities has been only about the relocation packages being offered, not about other options available to them by law.

6. *Evidence of irreversible damage and lack of co-existence options are legally required before relocation can be considered:* Both the WLPA and the FRA explicitly provide for two crucial steps prior to deciding on relocation: evidence that the activities of local people are causing *irreversible damage*, and that *options for co-existence* are not available. In not a single case where relocation is currently ongoing, have such studies and processes been carried out. In many cases studies and information which support strong possibility of co-existence are not even looked at, as in Simlipal. At best, scattered information on human-wildlife conflicts or poaching cases has been used to ‘prove’ irreversible damage or impossibility of co-existence, as if the mere presence of these is evidence enough. Nor is there a single instance where gram sabha consent has been sought and obtained on the matter of irreversible damage and co-existence, which is required in the WLPA. This draft protocol on relocation also completely ignores the need to carry out these steps.

7. *Steps for relocation:* While this protocol incorporates a number of steps for relocation, it does not yet amount to a full set of operational guidelines on relocation. MoEF must come up with such a set. For guidance it should refer to the proposed guidelines given to it by the Future of Conservation Network in 2008 (attached here for easy reference; or see <http://www.kalpavriksh.org/networks/future-of-conservation->) and to the recommendations of the FoC national consultation on relocation from tiger reserves (also attached; or see [http://assets.wwfndia.org/downloads/relocation\\_from\\_trs.pdf](http://assets.wwfndia.org/downloads/relocation_from_trs.pdf)).

8. *Scheme for co-existence and co-management:* In line with the MoEF scheme on relocation, there should be a scheme to support co-existence and co-management, in the case of protected areas (including critical tiger habitats & critical wildlife habitats) where these are determined to be the appropriate options. Otherwise there will remain a bias in PA management towards relocation, rather than giving all options equal priority.

9. *Stay illegal and improper relocation:* While the protocol is under consideration the relocation process is going on in the tiger reserves without following statutory requirements under FRA and WLPA. For instance, in Simlipal TR two core villages Jamuna and Kabatghai have been informed by the Sub-collector and forest department to convene Palli Sabhas in June to discuss relocation whereas the process of recognition of forest rights and other requirements under WLPA, FRA are not completed. The MOEF should issue a letter to the state governments to stop the ongoing relocation of villages till the protocol is finalized and implemented.

10. *Appeal and grievance mechanism:* There is no mechanism suggested for objection, appeal and grievance redressal as also for offence and penalties to deal with violations of the procedural compliance to the FRA and WLPA. The protocol should suggest that in case of grievance and violations of FRA the affected communities can appeal at a district level body (it can be the DLC) or at the SLMC set up under the FRA. Necessary actions should be taken against the concerned officials under Section 7 of the FRA.

**Specific comments**

<b>Section of Protocol</b>	<b>Current Text</b>	<b>Comments</b>	<b>Suggested text/ additions</b>
<b>Preamble</b>	<p><i>The purpose of this protocol is to facilitate the State forest department to carry out village relocation from notified core/critical tiger habitats, in compliance.....</i></p> <p><i>It must be emphasized, that such relocation must be purely voluntary and must not in any manner use force or coercion to enforce relocation/rehabilitation from core/critical tiger habitats of tiger reserves.</i></p>	<p>The guidelines are oriented more towards making sure relocation happens, rather than making sure it happens only where absolutely necessary; the two are very different.</p> <p>For relocation to be truly voluntary, the community must have information about all its options, and the facilities to avail of them. The Forest Rights Act (FRA) recognizes the rights of communities living within proposed Core/Critical areas, and thus options must be given to communities to continue with rights as provided under Sections 3(1) and 3(2) of FRA. Not to do so would be tantamount to forcible eviction by putting improper and illegal pressure on communities to accept relocation.</p>	<p>Suggested changed text: “The purpose of this protocol is to facilitate the State forest department to ensure that the process of relocation of villages (where required) from notified core/critical tiger habitats is in strict compliance with the relevant provisions of the WLPA and FRA.”</p> <p>Suggested additional text at end of this para: “This would include any manner of pressure or inducements relating to restrictions which deny the full range of rights available as per the law (including the Forest Rights Act), and withholding of information regarding the option of staying on with such rights if the communities choose to do so.”</p>
<b>1.1 / 4.4</b>	<p><i>“It has been established that a minimum inviolate area of 800-1200 sq.km is required for a viable population of tiger”</i></p>	<p>It needs to be made clear from the beginning, that the term ‘inviolate’ does not necessarily mean ‘human-free’ and therefore inevitably leading to relocation, and that the co-existence option is also available (as is the case with the draft protocol for Critical Wildlife Habitats). Providing such a definition of ‘inviolate’ at the beginning will help reduce arbitrary use of the term.</p> <p>By not restricting the term ‘inviolate’ to mean only ‘no-use’ or ‘human-free’, and by including ‘compatible uses’ that do not violate tiger (or other) conservation objectives, it would help in the conservation of a larger area of wildlife</p>	<p>Suggested additional text: “For the purposes of this protocol, the term ‘inviolate’ means “‘no use’ <u>or</u> ‘minimal use’ including compatible uses that do not violate conservation objectives.”</p>

		<p>habitat, given that in the Indian context, no-use areas would necessarily be few and mostly isolated fragments. Such a definition has been recommended by two national workshops on CWH, as also by the majority members of the MoEF-MoTA Committee on FRA.</p> <p>The Minister's own remarks relating to Biligiri Rangaswamy Temple Wildlife Sanctuary point to the possibility of co-existence of tigers and adivasis; this must therefore be explored at the same level as relocation options, in all tiger reserves.</p>	
<b>1.5 / 3.5</b>	<p><i>.... These ... include completion of the process of recognition and vesting of rights as specified in Section 6 of the said Act; establishing, by the concerned agencies of the State Government vis-à-vis their powers under the WPA, 1972, that the activities/ impacts of right holders are sufficient to cause irreversible damage to wild animals; concluding the non-availability of other coexistence options by the State Government; preparation of resettlement package while providing a secure livelihood; and free informed consent of the Gram Sabha.</i> (Section 3.5 cites the precise text)</p>	<p>While the need to establish irreversible damage and lack of options of co-existence, both with the consent of STs/forest-dwellers, are cited, these are not followed up by concrete or specific steps in Section 6.</p>	<p>Suggested text given below in comments for Section 6.</p>
<b>3. Relevant</b>	<p>3.3. Section 24 of the WPA, 1972 provides for acquisition of rights</p>	<p>Relevance of this provision with respect to the relocation process needs to be explained.</p>	

<b>provisions</b>	<i>in or over the land declared by the State Government under Section 18 (constituting a Sanctuary) or Section 35 (constituting a National Park).</i>		
<b>4.5 (b)</b>	<i>Establishing the identified core/critical tiger habitat as inviolate through voluntary relocation on mutually agreed terms and conditions</i>	Establishment of CTH can also happen through exploring options of coexistence. It need not always be through relocation. The specific text of the WLPA does not require relocation as a necessary step towards establishing an inviolate area.	Suggested changes (in bold): “Establishing the identified core/critical tiger habitat as inviolate <b>through co-existence options or</b> voluntary relocation, <b>as determined by due process</b> , on mutually agreed terms and conditions”
<b>4.7</b>	<i>The relocation is voluntary, and is done only if people are willing to move, as per the relevant provisions of the FRA, 2006, read with WPA, 1972</i>	It needs to be clearly stated that the communities have rights to continue in their current location as provided under FRA and gram sabha can reject any relocation plan.	Suggested changes (in bold): “The relocation is voluntary, and is done only if people are willing to move <b>after having been given all the options including those of staying on with rights vested under the Forest Rights Act and those of relocation</b> , as per the relevant provisions of the FRA 2006 read with WPA 1972”
<b>5.1</b>	<i>The salient points relating to ‘critical tiger habitat’ (CTH) and ‘critical wildlife habitat’ (CWH) are comparatively indicated below:  CTH- Process outlined in WPA, 1972</i>	If this means process for notification of CTH then it is not outlined in the WLPA 1972. The MOEF guidelines of 2007 provided for a procedure for notification of both CTH and CWH. The CWH guidelines are now being revised. But it is not clear which guidelines are meant for the CTH. As stated above in the General Comments, it is therefore important to have a protocol for the identification and notification of Tiger Reserves and CTHs, either as part of an expanded protocol covering all aspects of TRs/CTHs including relocation, or as a separate protocol issued along with this one on relocation.	
<b>5.5</b>	<i>Section 13 of the FRA, 2006 provides that the said Act shall be in addition to and not in derogation of the provisions of any other law for</i>	The reason why section 13 is mentioned here is not clear. In any case, if it is, then Section 4.1 must also be mentioned, which states: “Notwithstanding anything contained in any other law for the time being in force, and subject	

	<i>the time being in force.</i>	to the provisions of this Act, the Central Government hereby recognises and vests forest rights in” STs/OTFDs	
<b>5.6</b>	<i>Therefore, under section 4(b) of the FRA, 2006, the field authorities /Field Director of a Tiger Reserve may identify the core/critical tiger habitat as per section 38V 4(i) of the WPA, 1972, using the criteria of 800-1200 sq.km</i>	<p>The reference to 4(b) of the FRA appears to be a mistake here.</p> <p>The WLPAs require this to be done with an expert committee. Moreover, knowledge relevant for this would be available with communities also. FRA also recognizes the rights of the communities under 3 (1)(i) to conserve, protect and regenerate. Thus representatives of gram sabhas along with field directors and other local experts should form a committee for identification of CTH.</p>	Suggested change (in bold): “Therefore, as per section 38V(4)I of the WPA, 1972, <b>an expert committee that includes relevant officials, and independent experts from NGOs and local scheduled tribes and other traditional forest-dwellers,</b> may identify the core/critical tiger habitat, using the criteria of 800-1200 sq.km)”
<b>6.1</b>	<i>Step I: Identification/notification of the core/critical tiger habitat The identification should be done as provided under section 38V (4)(i) of the WPA, 1972.</i>	<p>The identification should be done in a transparent and open manner and in consultation with the gram sabhas. The open consultation should include public hearing, notices in local language and all options available to communities have to be discussed. Minutes of meeting with gram sabhas and gram sabha resolutions should accompany the project proposal.</p> <p>Refer also to our general comments above, regarding the need for a fuller protocol, with this one or separately, on identification and notification of Tiger Reserves and core/critical tiger habitats.</p>	Suggested additional text at end of para (as suggested also for 5.6 above): “This would be through an expert committee consisting of relevant officials, and independent experts from NGOs and local scheduled tribes and other traditional forest dwellers.”
<b>6.2</b>	<i>Step II: Establishing the core/critical tiger habitat for creating inviolate area for tiger involving relocation of families/villages from such areas.</i>	<p>After identification, relocation is not necessarily the next steps. The steps under this must include all the provisions of the law, including</p> <ul style="list-style-type: none"> <li>ensuring that recognition of rights is complete;</li> <li>ensuring that communities are informed of all</li> </ul>	Suggested changes (in bold): “Step II: Establishing the core/critical tiger habitat for creating inviolate area for tiger involving <b>either co-existence options with or without modification of rights,</b> or relocation of families/villages from such areas.”

	<p><i>Operational guidelines for Step II (Village relocation)</i>  <i>[Involving provisions of WPA, 1972 read with provisions contained in the FRA, 2006]</i></p>	<p>options they have, including of staying on with rights under FRA, and of relocating;</p> <ul style="list-style-type: none"> <li>• establishing whether there is irreversible damage, with ST/OTFD consent;</li> <li>• establishing whether co-existence options are available or not, with ST/OTFD consent;</li> <li>• establishing due process for relocation where necessary, including consent, full package, etc</li> </ul>	<p>“Operational guidelines for Step II (<b>co-existence or relocation</b>)...”</p>
<p><b>(new)</b> <b>6.2.2</b></p>	<p><i>Establishing ecological damage, options for co-existence, and need for relocation</i></p>	<p>Sections 38V(5)ii and iii require steps relating to establishing irreversible damage and concluding that options for co-existence are not available.</p>	<p>Suggested added text:          “The expert committee established under Section 38V(4)i, consisting of relevant officials and independent experts from NGOs and local communities, should undertake studies and consultations with a view to establishing the positive and negative impacts of local community practices in the proposed core/critical tiger habitat; such studies should include the historical, social, and ecological characteristics of the area, including the interplay of natural and human elements in the shaping of current landscapes and biodiversity;          The committee must consult with other experts, and with the local STs/other forest-dwellers on the issue of whether their activities are causing irreversible damage or not, and if it is concluded that they are, then to seek their consent for the same;          The committee must consult with other experts, and with the local ST/other forest-dwellers on whether reasonable options for co-existence are available or not, taking into account also the studies and conclusions regarding the impacts of their activities, and come to a conclusion on co-existence options with or without modification of activities and rights, seeking the consent of STs/other forest-dwellers if the conclusion is that there are no co-existence options available;          The committee should, in its final report, recommend options for co-existence with or without modification or</p>

			rights, or relocation, giving full justification and reports of relevant studies and consultations.”
<b>(new) 6.2.3</b>	<i>Establishing management and governance for co-existence</i>	This would be similar to the steps under CWH where co-existence is considered to be the appropriate option.	<p>Suggested text: “In areas where co-existence has been agreed upon, the Forest Department, with the forest-dwelling communities, should prepare a joint management plan for the CTH, in the light of the modified rights. This should also include scientific inputs by appropriately qualified ecologists and social scientists, and local community expertise, to balance the dual objectives of livelihood security and wildlife conservation.</p> <p>For the implementation and monitoring of the joint management plan, the concerned gram sabhas in the CTH area would prepare plan for management of CTH under section 3 (1)(i) and section 5 of FRA, through committees formed under Rule 4 (e). Such committees can form a federation for management of larger landscapes. A joint management body will be set up with a equitably balanced membership of the Forest Department, local communities including from gram sabha committees, and locally knowledgeable civil society organizations. The planning process should be based on a combination of plans developed by gram sabhas for areas under their management (as per Sections 3(1)i and 5 of FRA), processes of the Forest Department, and other expert inputs. Management should also aim to be adaptive, involving regular monitoring and feedback, and changes in strategies based on this. Further guidance on co-management should be developed by the National Committee, based on recommendations by the MoEF-MoTA Committee on FRA and relevant civil society inputs.”</p>
<b>6.2.2 (note that numbers</b>	<i>Relocation of villages after recognition/settlement of rights as above (i.e., identification/prioritization</i>	There is a need to specify that the entire process of planning for relocation from the very beginning must be with the relevant gram sabhas, and also to reiterate the legal provision (Section	<p>6.2.2 will be renumbered 6.2.4 (and so on for further sections)</p> <p>Suggested additional text (in bold): “Relocation of villages</p>

<p><b>of existing sections will change hereafter )</b></p>	<p><i>of villages, cut off date for residing families, choice of options etc.</i></p>	<p>38V(5)vi) that no relocation can take place unless facilities are in place at the relocation site.</p>	<p>after recognition/settlement of rights, <b>establishing irreversible damage, and exploring co-existence</b>, as above.</p> <p>Suggested additional text (to be inserted into appropriate parts of 6.2.2, now 6.2.4):  “Planning for the relocation must be done right from the start with gram sabhas that have consented to be relocated; this includes all aspects of the packages being provided. Special efforts need to be made to facilitate the participation of less privileged villagers in this process, and in particular the landless, minorities, and women. The final plan must have the written consent of the gram sabhas.”</p> <p>“As per Section 38V(5)vi, no relocation can take place unless the agreed to facilities and land allocation have been provided at the resettlement locations, and the gram sabhas have given a written resolution to this effect.”</p> <p>“Only families that give their consent to relocate, and with the relevant Gram Sabha’s consent, should be relocated; all families who do not volunteer to relocate should be allowed to stay.”</p>
<p>6.2.2.5</p>	<p><i>The cash option has been provided to cater to people who are not interested in a resettlement, but wish to establish themselves elsewhere under ‘mutually agreed terms and conditions’, as indicated in the WPA, 1972. This has adequate checks and balances as the money is provided through the District Collector after the villager produces evidence of his</i></p>	<p>The mutually agreed terms and conditions mentioned in section 38 V (5) are regarding the whole process of relocation and not just for self-establishment of affected families who are not interested in resettlement (option II). Quoting it for a specific component is problematic. The point should be either deleted or explained clearly in the context of the full meaning.</p> <p>The cash option is highly problematic and needs to be urgently rethought as villagers might not have the ability to adequately find a suitable</p>	

	<i>procuring land etc.</i>	<p>substitute for their livelihoods outside the forest.</p> <p>We suggest that the guidelines remove all reference to the cash option and focus instead on the adequate state-supported relocation package as that is in line with the FRA. The FRA is very clear that villagers have to be satisfied with the arrangements that are made for their relocation before agreeing to relocate.</p>	
6.2.2.7.	<i>Once the villagers have given the due consent, the necessary recognition/settlement of rights must be done as indicated under 6.2.1 above.</i>	It suggests that recognition of rights would be done <i>once</i> the villagers have given due consent which means recognition of rights after obtaining consent. This is not as per law.	This line should be deleted, or replaced with: “The necessary recognition/settlement of rights must be done as indicated under 6.2.1 above, before any process of relocation is carried out.”
6.2.2.8.	<i>Records of the rights vested in the said villages/forest dwellers must be obtained from the Gram Sabha, as have been approved by the District level Committee under Section 6(5) of the FRA, 2006. In case where records of forest rights are unavailable, the matter should be taken up with the District Collector.</i>	In case where records of forest rights are not available or where the recognition process is not complete the district collector should be asked to ensure completion of the process under FRA.	Suggested text: “In case where records of forest rights are unavailable or the process of recognition of rights under FRA is not complete the matter should be taken up with the district collector and the district collector should be asked to ensure completion of the process.”
6.3.1.2.	<i>In case of forest villagers having no tenurial rights, two bank accounts should be opened for each family viz., a savings account with a deposit of Rs. 1 lakh, and a joint savings account with the District Collector for an amount of Rs. 9 lakhs.</i>	This gives a meaning that forest villagers can not have tenurial rights whereas FRA recognizes rights of the forest villages. The meaning is not clear in this point. If it means forest villagers who are not eligible under the FRA, then this should be clearly stated.	

6.4. Related complementary guidelines	6.4.5. <i>The Forest Department (through the Field Director) must execute a MoU on stamp paper with the beneficiary as a proof of voluntary settlement.</i>	This can be manipulated and villagers forced to do this MOU as a proof of settlement. If the MOU has to happen then it should also indicate if the complete process has been followed in the relocation. Additionally it should have the approval of the gram sabha.	Suggested additional text at end of this para: “Such a MoU should mention about completion of procedural requirements under FRA and WLPA and should have the approval of the relevant gram sabha.”
	6.4.10 <i>... and a State level Monitoring Committee must oversee the process.</i>	Since all processes under the FRA are being monitored by the SLMC set up under that Act, it is important that it be given a role in this protocol also.	Suggested changes in text: “ ... and the State Level Monitoring Committee set up under the Forest Rights Act must oversee the process.”
Annex 2 Check list	<i>Stage 1 Identification/notification of core/critical tiger habitat</i>	<p>This should include gram sabha members and the local experts, and a resolution from gram sabha that they are aware of the identification and notification</p> <p>Copies of studies showing coexistence is not possible, including discussion with gram sabhas, details of irreversible damage or threat of damage with proof of facts, should also be included.</p>	<p>Suggested additional text for specific documents required under this head:</p> <p>“Copy of expert committee report(s) with proposed boundaries, justification, and other aspects of the core/critical tiger habitat, along with relevant studies and consultation reports.</p> <p>Copy of resolution from relevant gram sabhas that they are aware of the process of identification and notification of the core/critical tiger habitat, have participated in this process, and have consented to it.”</p>
	<p><i>Stage 2 Recognition/settlement of rights</i></p> <p><i>Relocation of villages</i></p>	<p>A number of steps and documents are needed at this stage, including those relating to completion of recognition of rights under FRA, studies and consent regarding irreversible damage, studies and consent regarding co-existence, and so on.</p> <p>This will include a third sub-head between the existing two on recognition and relocation, that of establishment of damage and of co-existence options.</p> <p>Additionally the relocation process needs some additional steps.</p>	<p>Suggested additional text for steps and specific documents required under this head:</p> <p>(under Recognition/settlement of rights”</p> <p>“Resolution of relevant gram sabhas that the process of recognition of rights under the Forest Rights Act is complete.”</p> <p>(new sub-head): “<b>Establishment of damage and co-existence options</b>”</p> <p>(under this new sub-head)</p> <p>“Report of expert committee on positive and negative impacts of local communities, and recommendations relating to damage, co-existence, and relocation; along with reports of consultations and studies to back up the</p>

			<p>recommendations. Consent of relevant gram sabhas regarding irreversible damage and co-existence options.”</p> <p>(under Relocation of villages) “Copy of relocation plan developed with relevant gram sabhas. Reports of monitoring bodies. Resolution of gram sabhas that facilities and land allocation at relocation sites are complete, and they are willing to move. Process and reports of social audits of relocation”</p>
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