To:
Nodal Officer
Chhattisgarh State Climate Change Centre
Aranya Bhavan, Nava Raipur
Chhattisgarh

Sub: Response to public consultation on draft Eco-restoration Policy

Greetings from the Ashoka Trust for Research in Ecology and the Environment (ATREE), Bangalore. ATREE is a globally recognised non-profit organisation focused on environmental conservation and sustainable, socially just development. ATREE engages in the generation and dissemination of rigorous interdisciplinary knowledge that informs and is informed by the needs of grassroots communities, policymakers and the wider public. I am writing in response to your notice dated 24th July 2024, regarding the draft Eco-restoration Policy for the State of Chhattisgarh.

At the outset, we commend the initiative of the Chhattisgarh government to formulate an ecosystem restoration policy. In the context of escalating natural resources degradation and climate change and the need to secure rural and forest-based livelihoods, it is imperative for the state government to formulate actionable visions, with necessary community, institutional and financial support. The draft policy contains a number of positive aspects, such as prioritising eco-restoration over afforestation, recognising the value of multiple natural ecosystems, and envisaging evidence-based approaches for restoration.

At the same time, owing to the importance of this policy, we believe that there are some aspects that require improvement to enable better outcomes. These include goal-setting (that is sensitive to the trade-offs involved), stronger role for local communities and democratic governance structures, restoring open natural ecosystems and embedding this new policy within the broader policy and governance context. Our detailed comments on these issues follow.

A wider and more in-depth consultation with civil society groups, researchers, local communities and governance institutions, scientists and other government departments/agencies would be beneficial to identify shortcomings and make improvements. In addition to our comments below, we request that the current public consultation window of 5 days be further extended and that the draft be translated into local languages to enable wider engagement, especially by rural and forest-dependent communities.

We seek your kind consideration of our comments in the preparation of the final guidelines and would appreciate the opportunity for further discussions, as necessary.

Sincerely,

Abi T. Vanak
Director, Centre for Policy Design
Ashoka Trust for Research in Ecology and the Environment
29 July, 2024

****

COMMENTS ON CHHATTISGARH DRAFT ECO RESTORATION POLICY

1. Identify the goals of restoration

Successful ecosystem restoration requires identifying a practical and relevant goal. Since restoration interventions can be undertaken at multiple scales and for multiple objectives, a guiding framework is necessary to identify goals and trade-offs. An ecosystem restoration policy should therefore focus on laying out the guiding principles of ecosystem restoration that can provide clear direction, engage actors, facilitate coordination, enable monitoring, and align efforts with broader environmental, social, and economic objectives.

While the draft references various sources, including the Supreme Court Expert Committee recommendations, State Forest Policy 2001 and several international principles, there is more clarity needed regarding the key principles that should guide ecosystem restoration in the state. For example, under what conditions can biodiversity conservation take precedence over community rights and livelihoods? How can climate resilience be balanced with agricultural productivity? What trade-offs are acceptable between ecosystem services and urban development? This would involve working with diverse stakeholders to set land type and tenure-specific goals (e.g., agriculture, commons, community forest lands, forest department lands).

Recognising that these considerations require contextual, bottom-up solutions, the policy should create a framework to engage relevant stakeholders, determine ecological benchmarks and offer decision parameters on these issues, rather than proposing specific or blanket strategies like "massive afforestation programmes on private, community and panchayat lands", "creation of wood-lands in urban areas", "creating a network of hotspots

of biodiversity", etc. (pg 40). Such an approach will promote restoring ecologically functional ecosystems that can enhance the livelihoods of those who depend on them.

Additionally, basing the proposed approach in forest ecosystems on the change matrix in forests requires closer scrutiny, especially in light of the recommendations of the Supreme Court Expert Committee that highlights the drawbacks of conflating plantations with forests.

2. **Empower local communities and institutions**

Local communities are vital for ecosystem restoration as they ensure efforts are sensitive to local ecology and livelihoods, promote stewardship, leverage local knowledge, and enhance accountability. This alignment fosters sustainable, long-term outcomes.

While the draft contemplates community engagement as an approach for restoration, there is scope to enhance the role and contribution of local communities. Specifically, the policy should recognise the role of local democratic institutions in deciding and implementing restoration activities, and promote community-led restoration. In the case of forest lands, Gram Sabhas under the Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006 (FRA) must have a central role and the policy must focus on accelerating the recognition of Community Forest Resource (CFR) rights and enabling CFR management.

Currently, a significant amount of public funds under programs like the Compensatory Afforestation Fund and National Afforestation Program are under-utilised and can be made available for restoration activities. Allocating these budgets to CFR Gram Sabhas, proportional to the forest lands they manage, would improve restoration outcomes through more socio-ecologically appropriate interventions.

3. **Expand the coverage of landscapes and ecosystems**

Chhattisgarh has 4,784 thousand ha (about 35% of the TGA) affected by different kinds of degradations (Indian Council for Agricultural Research, 2010). This spans different ecosystems, including human-dominated ecosystems such as farmlands. The UN Decade for Restoration recognises the need for ecosystem restoration across different landscapes.

The draft's primary focus is currently on forest ecosystems and has scope for expansion to other ecosystems. For instance, the chapter on the need (drivers) of ecological restoration only discusses forests. While other ecosystems such as wetlands, rivers, grasslands and urban areas are mentioned, there needs to be additional details and need to address the drivers of degradation. Highlighting mining-led ecosystem degradation in the draft is a

progressive step but strategies for restoration should address both the ecosystem and the underlying functions and services (such as hydrological flows) at appropriate scales. Crucially, agricultural lands and grazing commons need to be included in the scope of this policy. Additionally, urban tanks require immediate restoration to combat severe eutrophication caused by untreated urban and industrial sewage.

The policy must adopt a more holistic approach covering all types of ecosystems because they are interconnected and their health depends on their interactions. Addressing the drivers of degradation and creating a vision spanning all ecosystems will ensure holistic and effective restoration. A recent study conducted by ATREE (commissioned by the Chhattisgarh Rajya Niti Aayog) highlights the urgent need for ecological restoration of natural wetlands (particularly oxbow lakes, only 5 of which remain) and proposes a typology based on their sociological health. Such studies must be leveraged to expand the scope of restoration and to prioritise restoration decisions.

4. Eco-restoration vs. Afforestation

Large-scale afforestation as a restoration approach is no longer advocated by the UN Decade of Restoration, as there is growing recognition of the importance of unique ecosystems such as grasslands and shrublands which are rich in ecosystem services. The draft rightfully recognises this shift and the need to limit afforestation and restore open natural ecosystems.

However, the draft needs to engage with broader evidence. For example, afforestation is being proposed as a strategy in forest ecosystems (pg 41) and private, community and panchayat lands (pg 40), while limiting grasslands restoration to protected areas (pg 42). Afforestation should be used carefully, limited to cleared or degraded forests and subject to community decisions. Forest restoration should prioritise natural regeneration and reforestation.

Restoration must extend to natural grasslands that exist outside protected areas (which cover a larger area in Chhattisgarh than grasslands within protected areas), particularly in the northern districts of Surajpur and Balrampur. When undertaken in line with the priorities of local communities, these activities can enable the management of grasslands as multi-use ecosystems benefitting livelihood, biodiversity and climate change goals. Recognising community forest rights of pastoral communities must also be prioritised as an important step in this direction.

5. Create linkages with existing policy frameworks

A new ecorestoration policy should be set within the context of existing laws, policy and programs to ensure coherence, enable institutional coordination, leverage existing frameworks and enhance resource efficiency. This integration aligns restoration goals with associated local and national priorities, ensuring compliance with established laws and regulations.

The policy should make these linkages explicit and functional by mapping relevant laws and programs, aligning it with existing frameworks and establishing mechanisms for convergence. These would include, without limitation, State Action Plan on Climate Change, Compensatory Fund Act, Green India Mission, Wetlands Conservation and Management Rules, Panchayat (Extension to Scheduled Areas) Act, National Rural Employment Guarantee Act, FRA, etc. In terms of funding and budgetary aspects (which the draft misses), the policy should integrate these existing sources of public finance which could provide a significant resource base to mobilise action.

Additionally, the policy must envisage solutions to the identified challenge of weak enforcement and monitoring of rules on the diversion of forests and other ecosystems for developmental purposes. For example, the draft rightly highlights the issue of forest diversions for mining and can propose measures for (better) implementation of public participation and free prior informed consent provisions in existing laws.

6. <u>Operationalise research and evidence-based practices</u>

Promoting research and evidence-based practices is essential for the success of a new ecorestoration policy. Effectiveness, efficiency and sustainability of interventions can be improved by grounding efforts in scientific research and traditional knowledge. Suitable monitoring and evaluation frameworks must be applied to restoration activities to create feedback loops for learning and improvement.

The draft is progressive in recognising these needs. However, more explicit consideration is required for their operationalisation through institutional mechanisms and processes for these collaborations and activities. In the spirit of participation and inclusion of public opinion and expertise, the policy should lay out an empowered consultative mechanism for feedback from scientists, civil society and local communities that can guide action. It should also ensure that restoration action in any ecosystem is based on a detailed analysis of the drivers of degradation, needs of restoration (and trade-offs) and participatory formulation of interventions (including monitoring indicators).

7. <u>Social justice and equity as the bottom line</u>

Social justice is crucial in (and for) ecosystem restoration and restoration efforts must be inclusive, equitable and beneficial for all, particularly marginalised communities. Since an ecorestoration policy spans ecological and social dimensions, it is important for it to recognise historical injustices and adopt equity (in resources, decision-making, etc.) as a guiding principle. This means that the future goals of the policy should account for how different stakeholders have been affected by past actions (relating to natural resource management and use).

For example, in terms of "Habitat Creation/Management" within forest ecosystems (pg 41), the draft emphasises restoring natural habitats lost or degraded by human activities, such as through creating wildlife corridors. It is vital to recognise the outsized impact of large-scale, resource-intensive developmental projects and ensure that remediation efforts do not harm local livelihood practices through exclusionary conservation practices.