

IMPACT OF COMPENSATORY AFFORESTATION ON LAND & FOREST RIGHTS: INTERIM REPORT

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The Community Forest Rights-Learning and Advocacy (CFR-LA) process was initiated in 2011. It facilitates the exchange of information and experiences related to the Community Forest Rights provisions of the Forest Rights Act. It encourages people-to-people learning, awareness and training programmes, and provides need-based and site-specific help. As part of CFR-LA, evidence-based advocacy on CFR is done on state and national levels by holding dialogues, writing petitions, producing citizens' reports, newsletters, state reports, and by organizing consultations. Websites <http://fra.org.in>, <http://www.cfsla.org.in/> and <https://groups.google.com/forum/#!forum/CFR-la> (discussion group) have been created, which include over 400 participants. Local community members, their sangathanas, civil society groups at local, state and national levels, researchers and academics are part of the CFR-LA process.

TWITTER: [@ForestRightsAct](https://twitter.com/ForestRightsAct) for information on FRA.

IMPACT OF COMPENSATORY AFFORESTATION ON LAND & FOREST RIGHTS: INTERIM REPORT

Compensatory Afforestation (CA) is a statutory process meant to compensate the loss of forests to mining, industries, infrastructure etc., mainly by raising plantations on non-forest land or degraded forest areas. Apart from the costs for compensatory plantations, the government also collects the net present value (NPV) of 'diverted' forests and a range of other funds from user agencies (companies and government agencies) who use the forests for non-forest activities. The huge amount of money thus collected, standing at Rs.42,000crores today, is being termed as Compensatory Afforestation Fund (CAF). So far part of these funds have been released for carrying out afforestation and plantation activities through an ad hoc mechanism through the compensatory afforestation fund management and planning authority (CAMPA).

With the enactment of the Compensatory Afforestation Fund Act, 2016, the huge amount of CAF has been brought under the control of the forest bureaucracy, and will be used for plantations and afforestation. The CAF Act has been widely opposed by adivasis and forest dwellers, women organizations, particularly vulnerable tribal groups and pastoral communities, researchers, activists and international organizations for bypassing the rights of communities, and the authority of the Gram Sabhas over forests as vested by the Forest Rights Act. In response, the then Minister of Environment, Forests and Climate Change had made an assurance in the Rajya Sabha that the Rules formulated under the Act, to be passed within a year, will address Forest Rights Act and provide for the consent of gram sabhas for CA activities on lands vested in them in conformity with the FRA.

While the Rules are still pending beyond the deadline, existing CA projects under the ad-hoc CAMPA continue to operate across forest-rich states. These funds are additionally channeled through climate change mitigation schemes at the national level, such as the Green India Mission, or the state level, such as Ama Jungle Yojana (Odisha) and Haritha Haram (Andhra Pradesh), to forcibly set up plantations on common lands. Yet, instead of arresting deforestation, CA stands witness to increased forest diversion for large-scale development and infrastructure projects, causing the double dispossession of forest-dwelling communities. First, when they lose forests for development projects, and then, when plantations to compensate for the diversion are set up on their common lands.

This brief contains the preliminary findings of an ongoing study on the implementation of compensatory afforestation programmes, their impact on tribals and forest dwellers, rights vested in them through the FRA, as well as on forest and biodiversity. While the present brief presents interim findings from the states of Odisha, Jharkhand, Maharashtra and Chhattisgarh, documentation of case studies from other states is ongoing. The study will also bring out cases of alternative approaches of community based afforestation initiatives.

The findings presented in the interim brief are extremely relevant as the government is in the process of implementing the CAF Act for which rules are under preparation. Implementation of the CAF Act will lead to the release of over Rs. 42,000 crores for compensatory afforestation and related activities under the control of forest bureaucracy.

Methodology and data sources

The brief draws on:

- 1) 63 case studies based on field data collection from the states of Odisha, Jharkhand, Maharashtra and Chhattisgarh through an open-ended questionnaire, covering 58 villages in total.
- 2) Testimonies and information shared at meetings and consultations on forcible plantations and compensatory afforestation involving forest movements, state groups, activists, researchers, CSOs, among others
- 3) Secondary data analysis of plantation works downloaded from the Forest Clearance and egreenwatch websites, to present findings on forest diversion and species composition of afforestation by the forest departments
- 4) 44 plantation-related conflicts reported by the Land Conflict Watch website from across the states
- 5) Analysis of Google Earth maps downloaded from e-greenwatchwebsite
- 6) Secondary research, existing and ongoing, on compensatory afforestation

OVERVIEW OF MAJOR CONCERNS REGARDING CAF

The major concerns relating to the CAF Act are that:

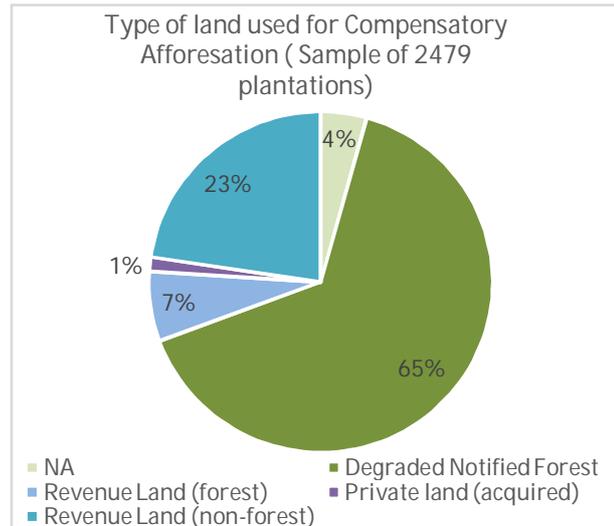
- i) It creates a perverse incentive for forest diversion as opposed to its stated objective of arresting deforestation
- ii) It facilitates dispossession of adivasis, other traditional forest dwellers, PVTGs and pre-agricultural communities, pastoralist and nomadic, women from community forest lands and resources vested in them by the FRA, as well as other common lands under their title, use and occupation
- iii) It undermines the rights and authority of gram sabhas to govern and manage community forest resources, by
 - a. Bypassing the requirement of the free, prior and informed consent of gram sabha for using/diverting forest land, which is now a legal requirement under FRA, PESA
 - b. Empowering Joint Forest Management Committees or Van Suraksha Samitis to undertake plantations, which are dominated by the forest bureaucracy but no longer have legal standing after FRA
- iv) CA destroys natural biodiversity and disturbs local ecosystems on account of its preference for monoculture commercial plantations, often through exotic or invasive species
- v) It threatens the food security and livelihood of forest-dwelling communities by replacing food habitats with monoculture plantations.
- vi) It facilitates massive corruption and mismanagement of a large volume of public funds, as established by the government's own reports
- vii) Implementation of CAF Act accentuates the threat of forcible plantations and land conflicts due to the denial of tenurial and food security has the potential of further inflaming conflict in LWE areas

KEY FINDINGS AND ANALYSIS

TYPE OF LAND USED

Secondary data downloaded from e-greenwatch website for 2479 compensatory afforestation projects in 10 states was analysed. These projects cover an area of 63,628 ha. taken up at a cost of Rs 195 crores during the period 2007-2017. No data is available for the performance and survival of the trees planted in these plantations on the e-greenwatch website.

The data analysis shows that almost 70% of the compensatory afforestation has actually been taken up on forest lands rather than non-forest lands. This is in violation of the guidelines (para 3(2)(i)) issued under the Forest (Conservation) Act, 1980. As per these guidelines, CA should be done on non-forest land in the same district where there is diversion of forest, or in areas closer to it. Only if non-forest land is not available should the plantation be set up on degraded forest land twice the area of diverted forest land.



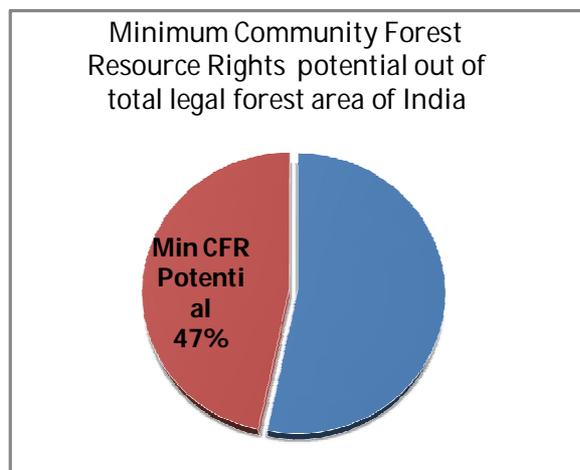
Consultations with community members, activists, researchers and CSOs also revealed that plantations drives have been most actively pursued in dense forest areas in some states. In Maharashtra, for instance, the CA plantations have been carried out in Gadchiroli district, Wadsa forest division, where about 1000 ha were taken over for plantations in the years of 2015-17 in a region with 70-90% natural forest cover. Similarly, in Kandhamal, Odisha, plantations have been pursued with fervor, despite the area being one of the most heavily dense forests in the country. It is becoming evident that forest land with potential for recognition of rights or where forest rights (IFR and CFR rights) have been already vested are being illegally handed over to the forest dept for compensatory afforestation. This is likely to accelerate with the recent guidelines proposed by MoEF to create land banks for CA purposes covering revenue lands/*zudpi jungle/chhole/bade jharka jungle/jungle-jhari land/civil-soyam lands and all other such category of lands* and other forms of community forests, without any mention of FRA. For example, in Odisha about 50 percent of total forest land comes under the revenue forest categories recorded in the record of rights of villages and over which local communities have traditional rights.

ADVERSE IMPACT ON FOREST RIGHTS

Studies on Forest Rights Act estimate that a minimum of **47%** of India's forests are now legally vested as CFRs of adivasis and forest-dwelling communities. However, only **3% of this 47%** has officially been recognized.¹ The abysmally low performance of CFR rights recognition raise serious

¹¹ CFR-LA, PROMISE AND PERFORMANCE: TEN YEARS OF THE FOREST RIGHTS ACT IN INDIA: CITIZEN'S REPORT ON PROMISE AND PERFORMANCE OF THE SCHEDULED TRIBES AND OTHER TRADITIONAL FOREST DWELLERS

threats for dispossession as the forests being diverted for non-forest purposes as well as those allocated for compensatory afforestation come under potential CFR areas.



This section documents the violation of the bundle of forest rights- namely, community rights, community forest resource rights for governance and management of forests, and individual forest rights- by virtue of CA plantations, from 63 case studies collected in Odisha, Jharkhand, Maharashtra and Chhattisgarh, as well as Google Earth imaging. It also draws from testimonies of participants from state and national level consultations.

STATUS OF RECOGNITION OF CFR/CR

In 43 out of 56 instances (information is not available for 7) CFR/CR rights have been claimed, with recognition (titles issued) in only 22 cases. This includes even cases where CR/CFR titles have been granted illegally to the Joint Forest Management Committee (e.g. Edmagondi, Chhattisgarh).

In some of the recognised claims only part of the CFR claimed was recognised, without offering reasons as per the legal procedure. For instance, in Pitaguda in South Forest Division of Kalahandi, out of 300 acres claimed as CFRs, only 13 acres were recognized.

TOTAL NUMBER OF VILLAGES	56*
	<i>Information not available for 7 villages</i>
Community Rights/ Community Forest Resource Rights claimed	43 villages
CRs/CFR rights recognized	22 villages
CR/CFR rights pending	21 villages
CR/CFR rights not yet claimed	13 villages

There is evidence to suggest that in several villages, FRA claims are kept pending or are outrightly rejected in anticipation of CA plantations. In Ganjadih and Arjuni (Baloda Bazaar, Chhattisgarh), the plantations were set up on CFR and IFR lands soon after they were claimed. In Arjuni, Chinabhatta (Gariyabandh) and Kasaundi (Baloda Bazaar), all in Chhattisgarh, IFR claims were expressly rejected and then taken over for plantations. In Kasaundi, this has meant great hardship to 4 marginal farmers whose IFR claims were rejected on the grounds that the claimed area was in the "orange zone", and then taken under plantations. In the case of village Pimpalgaanv, Wadsa forest division, Gadchiroli district, the forest department has set up plantations in 2015-16 and in the year 2016-17,

covering claimed IFR lands which have been under occupation by some adivasi households for 30 years.

PLANTATIONS AND CLOSURE OF VESTED CFR/CR LANDS

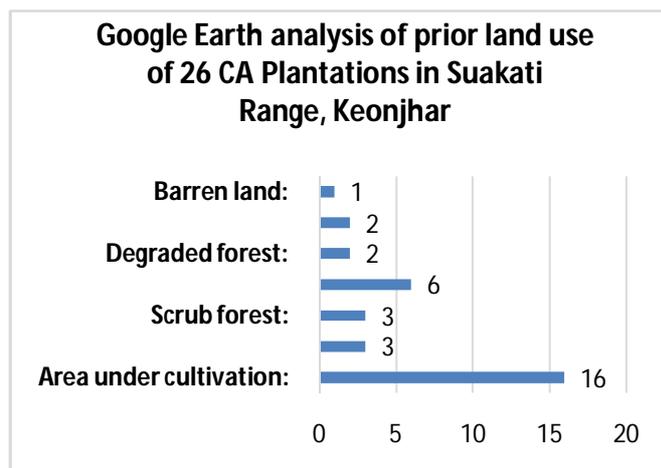
Out of 56 villages (information not available for 7 villages), Forest Department has taken up plantations on CFR/CR lands in **50 cases**. The plantations illegally restrict the rights over these lands under multiple sections of FRA, 2006.

The Forest Department follows the practice of fencing such plantations, posting guards, installing CCTV cameras, and illegally alienating such lands from Gram Sabhas and tribals and forest dwelling rightsholders. In Gadchiroli, the plantation is proposed on CR lands adjacent to villagers, where even the pathway to the plantations has been blocked. Consequently, the exercise of grazing (S.3(1)(d) FRA) and NTFP collection (S.3(1)(c), FRA) rights is prevented or severely restricted. At least 29 villages experience high degrees of restriction on NTFP collection. In 14, the plantations restrict grazing rights. In Kaima village, Jharkhand, the Forest Department burnt pastures and herbs to set up the plantations.

The CA plantation sites were illegally fenced off by FD in 25 out of 45 cases, restricting multiple rights vested by FRA. This is actionable under Prevention of Atrocities Act.

Some villages also report denial of access to sites of cultural or religious significance. In Arjuni, Chhattisgarh, villagers have lost access to the samshan or burial grounds inside the forest, and in Sarasdol to the *kurrapatof* Gond and Bhinjwara tribes. In Sohavan, Jharkhand the plantation has been set up on the *khelmaidan*. In Niyamgiri, where the Dongria Kondhs, a PVTG community opposed mining in their habitat areas, CA plantations have been proposed on sacred groves deep inside the forest.

LOSS OF INDIVIDUAL FOREST RIGHTS TO PLANTATIONS



In 13 villages, loss of IFR lands (claimed, pending, rejected, and not yet claimed) to CA plantations were reported, including in Beriyadamar, Jharkhand, where the houses were forcibly destroyed for a CA plantation. More importantly, individual forest lands eligible for rights recognition, but not recognized till date, has been forcibly taken up for plantations.

In Chinabhatta village, Gariyabandh district, Chhattisgarh, a woman belonging to the Gond tribe applied for IFR titles in 2008 over 5 acres of land that she had been cultivating for 30 years. After much struggle, title was given for 2.5 acres of this land, while the other 2.5 acres were taken over by teak plantations. Similarly, in Kasaundi, Baloda Bazaar district, Chhattisgarh, IFR claims on 4 marginal farmers over the land they were cultivating for 20 years were

rejected, and then fenced off for plantations. The FD has coercively displaced them from their plots by letting cattle lose on their cultivation, 'arresting' the farmers' own cattle, or throwing away their taunga. They have now been pushed into distress migration for daily wage labour.

A separate analysis of satellite imagery of 26 CA plantation sites in Suakati Range, Keonjhar Forest division, clearly shows that 16 plantations have encroached on cultivated areas and 3 have been taken up on land under shifting cultivation. Almost all the cases are in villages with Juang PVTGs illustrating how plantations are affecting the most vulnerable people of India. Sample Google Earth time-lapse imagery is attached as **Annexure 1**.

OTHER COMMON LAND RIGHTS

In addition to forest lands, successive guidelines and circulars by the MoEFCC have also brought revenue and other common lands such as *zudpi jungle*, *chhote/bade jhadka jungle*, *jungle-jhari land*, *civil-soyam lands* under land banks for CA activities.² These lands are traditionally used and accessed by forest-dependent tribal and OTFDs, and fulfill critical livelihood needs.

Forcible plantations have also been taken up on these lands. In Sasapasi village, Dhenkanal district, about 26 households had pattas inside the revenue forest village. and had also claimed IFR titles to small plots of adjacent lands which had been under their cultivation. In 2014-15, a plantation was set up over 70 acres of land in this and adjacent villages through the JFMC, which included 16 acres of the same lands under habitation and cultivation. When the forest department did not heed to the complaints of the villagers, they decided to uproot the plantations in exercise of their rights. Consequently, the Range Officer in connivance with the JFMC filed false cases against 14 villagers. At the police station, 6-8 of these villagers were forced to sign blank papers, and also an undertaking that they would not claim the lands under plantation. It was only after complaints and petitions to the State Human Rights Commission and the Tribal Department that the Collector initiated an inquiry into the matter.

CAMPA funds have also **been used to forcibly 'relocate' communities from Protected Areas, as in the case of 4 villagers in Polavaram.** For those already displaced by development projects, as in Odisha for the Rengali River project, the FD has set up plantations forcibly on the provisional pattas they were granted over the land for rehabilitation.

Some villages in Maharashtra initiated court proceedings against the Forest Department over forcible plantations in response to which FD agreed to pay compensation, but has actually not done so.

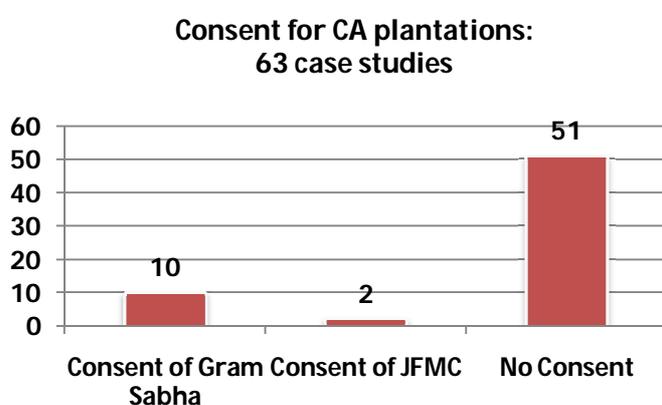
VIOLATION OF THE AUTHORITY OF THE GRAM SABHA

FRA vests legal authority with the Gram Sabhas of forest rights holders to govern and manage forests. With a minimum potential for recognizing CFR rights over at least 47% of India's forests, FRA establish the decision making authority of Gram Sabhas over a vast expanse of forests. This entails that any kind of forest land use and forestry activities in CFR areas require the consent of the

² 2003 Guidelines.

Gram Sabhas. In case of forest land diversion this legal requirement is specifically provided in guidelines issued by MoEF and MoTA as well as reinforced by the Supreme Court (*Niyamgiri* case). The same legal requirement must apply to the CA plantations requiring the forest dept to obtain free prior informed consent of Gram Sabhas and forest rights holders. The institutional mechanism under CAF Act completely negates the legal authority of Gram Sabhas by proposing management of CAF funds by authorities at the national and state level are heavily stacked by forest bureaucracy with no representation of tribals and forest dwellers, people's representatives. This section documents how the CAF Act actively undermines the democratic forest governance by marginalizing community institutions in decision-making that impacts their rights. These findings are drawn primarily from the 63 case studies from 3 states, and testimonies and evidence from meetings and consultations with affected persons, activists, researchers, CSOs.

CONSENT OF GRAM SABHA FOR CA PROJECTS



In about 53 cases from the 63 case studies no consent was taken from Gram Sabhas for plantation. In only 10 cases the Forest Department obtained the consent of gram sabhas for CA projects on village land or vested CFR lands as in Pitaguda (Odisha), Kaima (Jharkhand) and 8 sites in Maharashtra (oral consent). In 2 cases (Edmagondi, Rajnandgaon in Chhatisgarh; Pimpalgaonv, Gadchiroli in Maharashtra), the Forest Department fraudulently undertook consultations

with the Joint Forest Management Committee instead of the Gram Sabha.

Testimonies from consultations reveal that the FD undertook fraudulent and coercive consent proceedings in several villages, often through violence and illegal arrests. In Tadoba (Maharashtra), some villages in Odisha, men and women both were assaulted to obtain their consent. FIRs were also falsely filed against 14 men in Sasapasi village, Dhenkanal, and 4 in Tadoba, who were detained at the police station and coerced into signing on blank papers.

UNDERMINING DEMOCRATIC FOREST GOVERNANCE

The implementation of CAF is found to gravely undermine democratic forest governance by sidelining the gram sabha in decision-making processes. Plantation works are instead carried out through Joint Forest Management Committees, Van Suraksha Samitis and others, which are dominated by the forest bureaucracy. These JFMCs no longer enjoy legal validity after the enactment of FRA, since the authority for forest management now vests in the Gram Sabha.

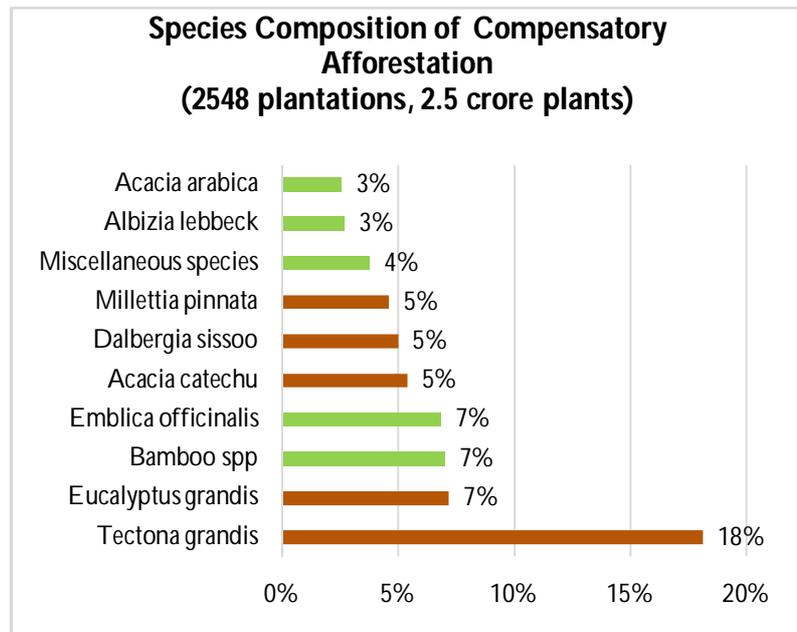
In Odisha, Maharashtra, Jharkhand, Chhattisgarh, among other states, these JFMCs have been revived particularly in areas where the Gram Sabhas are active in asserting their rights, as in Sasipala village, Dhenkanal mentioned earlier, where the JFMC was also behind the false FIRs against 14

villagers. In Maharashtra, anganwadis, private schools, among a range of other actors, are activated to undertake plantation drives, to the complete exclusion of gram sabhas.

DESTRUCTION OF NATURAL FORESTS AND BIODIVERSITY BY CA PLANTATIONS

The study also assessed the impact of CA plantations on forests and natural biodiversity as well as its usefulness in livelihood of forest-dependent communities.

The FD shows a strong preference for monoculture, commercial, exotic and invasive species that demand excessive resources and harm the surrounding biodiversity. . Data from 2548 CA plantations from 10 states clearly show that 60% of the plantations are of commercial species, with teak and eucalyptus together comprising more than 25% of trees planted.



The emphasis on planting commercial timber species to replace valuable, diverse natural forests illustrated the underlying failure of CA strategies.

THREATS TO NUTRITIONAL AND LIVELIHOOD SECURITY

Monoculture plantations of commercial species are of scarce use for the food basket or livelihood of forest-dwelling communities. The replacement of natural biodiversity on forest and common lands by monoculture species, coupled with prohibitions on cultivation, restricted access to NTFP collection, is found to have an adverse impact on the food security of forest-reliant communities.

As in the case of the KutiaKondh PVTG from Kandhamal, Odisha, eucalyptus plantations set up on their CFR and cultivable lands have severely affected their food basket, which earlier comprised 25 diverse forms of millet cultivated. Those still engaging in cultivation and collection of NTFP in the area have been harassed, arrested or physically assaulted by the State Forest Department.

IMPACT ON WOMEN AND PVTG

It is clear that CA plantations are contributing to the further dispossession of vulnerable groups even within adivasi and forest-dwelling communities, specifically women and Particularly Vulnerable Tribal Groups (PVTGs).

Excessive restrictions on NTFP collection and grazing across sites have a disproportionate impact on women within communities, who are responsible for meeting the daily livelihood needs of households. They are either forced to travel long distances, or experience harassment and violence in attempts to access fenced off plantation areas.

The study documented evidence of long-lasting adverse impacts of plantations on PVTGs such as the Kutia Kondh in (Kandhamal) and the Kamar tribe in Gariyaband (Chhattisgarh). Under the FRA, PVTGs are entitled to special Habitat Rights (S.3(1)(e), FRA) on account of their almost complete reliance on forest resources for self-sufficiency. The denial of access to this habitat has adverse impact on their food security, and cut off most avenues for livelihood sustenance. The Kutia Kondh community has only now resorted to distress migration outside their habitats- an unprecedented move in their community. The Kamar PVTG in Tuhametha village (Gariyaband district, Chhattisgarh) lost 20 IFR lands over 25 acres to forcible bamboo plantations, fenced from all sides. The villagers have been threatened by the Forest Dept. against cultivating the area, and are now driven to distress migration as daily wage labour.

PERVERSE INCENTIVE FOR DEFORESTATION

While the stated goal of CAF is to compensate for forests diverted for development and infrastructure projects, in practice, it creates a perverse incentive to accelerate deforestation. Between 1980-2016, more than 1.5 million hectares of forest land have been diverted under the Forest Conservation Act, 60% of which is for infrastructure, irrigation, mining and other development projects.³

The Table I shows the extent of forest lands diverted since 1980. 46% of forest diversion nationally has been carried out after the enactment of Forest Rights Act, 2006, mostly without ensuring recognition and vesting of rights and without taking consent of Gram Sabhas. In Jharkhand, 64% of forest land diversion occurred after FRA, 2006.

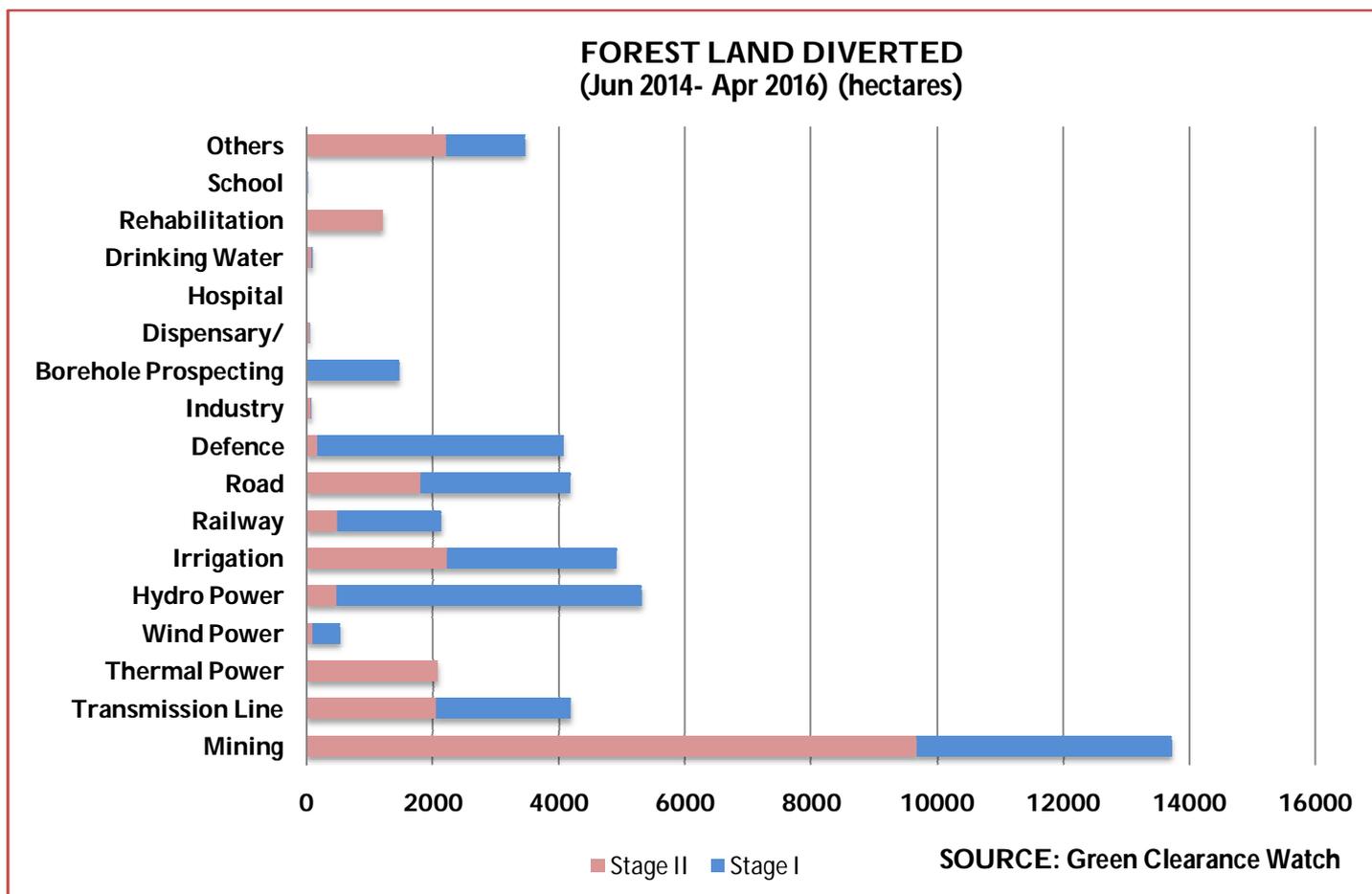
Forest Land Diversion			
	Land Diverted(Ha)		
	1980-2016	2006-16	%
India	1,510,146	702,551	46
Chhattisgarh	50,138	30,494	61
Jharkhand	37,176	23,707	64
Odisha	72,275	30,667	42
Maharashtra	37,753	16,607	44
Rajasthan	41,406	20,870	50
<i>Source: egreenwatch.nic.in</i>			

For further comparison, between June 2014 and April 2016, just prior to the enactment of CAF Act, the MoEFCC has granted **Stage-I** approval for diversion of 47,500 hectares of forests nationally. This is more than the forest land diverted in the decade between 2006-16 in the states of Chhattisgarh and Maharashtra combined! The mining sector accounts for the highest share of 29%.⁴

³<http://www.cseindia.org/userfiles/Forest%20clearance.pdf>

⁴<http://www.greenclearancewatch.org/node/7762>

Stage-I in the forest clearance process is the stage at which in principle agreement to the project proposed on forest lands is granted, based solely on the identification and mutation of lands for compensatory afforestation. The rapid pace of Stage-I clearances preliminarily suggests that the compensatory afforestation process has been reduced to one item on the government's agenda of granting speedy disposal of clearances for increased diversion of forest land for non-forest purposes.



CORRUPTION AND MISMANAGEMENT OF FUNDS BY FD

Government reports point to the sheer inefficiency and incompetence of the forest dept to implement CAF projects. The CAG report 2013 brings out glaring inefficiency in the utilization of CA funds. It states that a meager 12% of accumulated CA funds until 2012 were released to the states, that a further 40% of those remain unspent, and that grave irregularities plague the utilization of these funds by the forest department. For instance, plantations sites are identified on existing teak and acacia plantations, or on lands earmarked for road widening, or in the middle of dense vegetation. It notes that 53 out of 56 CA plantations raised on Jhabua land bank in Gujarat between 1997-2000 failed due to the lack of maintenance. In Tamil Nadu, jatropa plantations raised in 2005-6 in 10 districts reveal a survival rate of nil to 75%, on account of lack of maintenance.

Participants at the consultation reported that in West Bengal, Jharkhand, Sikkim and Kashmir, the Forest Department has passed off dense natural forests, or those under community management, as CAMPA plantations. Often, the same sites are identified for CA for multiple different projects. The survival rate of plantations ranges from a dismal zero to 75%. CAMPA funds have also been used to purchase guns and ammunitions, luxury cars, mobile phones, laptops and foreign trips for forest bureaucracy, as well as on non-permissible activities such as eco-tourism, in Chhattisgarh.

Participants at the consultation also reported that CA is often undertaken in name only, while the large amounts of public money remain unspent or are siphoned off. In West Bengal, Jharkhand, Sikkim, Maharashtra and Kashmir, the Forest Department has passed off dense natural forests, steep slopes of mountains, and even forests under community management, as CAMPA plantations. Often, the same sites are identified for CA for multiple different projects.

AGGRAVATING CONFLICTS

There are apprehensions that implementation of CAF Act through an empowered and more aggressive forest bureaucracy will intensify conflicts and LWL activities in forest and tribal areas. The demand for land banks driven by the private sector are causing governments to prematurely delineate land and dispossess rightsholders even in the absence of any development-related activities, which is also likely to aggravate conflicts. The website www.landconflictwatch.org already documents approximately 44 conflicts linked to forest plantations across the country, impacting 51,000 people and 114,000 hectares of forest lands. This can safely be called an under-estimation. Increased conflicts related to tenurial security, dispossession, displacement and human rights violations are likely to place private investments in these areas under jeopardy.

DEMANDS AND RECOMMENDATIONS

- 1) Repeal of CAF Act or amending it to ensure compliance with the Forest Rights Act;
- 2) Ensure that all accumulated CA funds are democratically managed and administered by transferring to the Gram Sabhas empowered to manage and conserve forests, and, at the minimum, all activities with the fund must be done with the free, prior and informed consent of Gram Sabhas;
- 3) Those illegally evicted and/or relocated for CA plantations must be restituted and compensated'
- 4) Immediate withdrawal of Guideline F.No.11-423/2011- FC, dated 8th November 2017 for creation of land banks for CA purposes from revenue and common lands.