

National Biodiversity Action Plan

ASHISH KOTHARI, KANCHI KOHLI

Over the last few years the Ministry of Environment and Forests has become a rubber stamp for the most destructive and unsustainable process of “development” unleashed in India. Several environmental regulations have been systematically re-engineered to fall in line with the status quo of the great green cover-up. The National Biodiversity Strategy and Action Plan was just another victim of this process, dumped because it recommended uncomfortable steps necessary to reorient the economy and polity towards greater sustainability, accountability and democracy.

India's Ministry of Environment and Forests (MOEF) sure knows how to waste money and undermine its own initiatives. A million dollars for a wide-spread planning exercise has just been unceremoniously dumped.

In 1999, MOEF received a grant of about this amount, from the United Nations Development Programme (UNDP)/global environment facility, to prepare a National Biodiversity Strategy and Action Plan (NBSAP). This was part of India's obligations under the UN convention on biological diversity, which requires all party countries to prepare laws, plans, and policies that help achieve three main goals: the conservation of biological diversity, the sustainable use of biological resources, and the equitable sharing of benefits arising from such use. Starting 2000, the NBSAP was to be prepared in two years. It was to have built on the national policy and macro-level strategy on biodiversity, brought out by the government of India in 1999, by detailing specific actions that could help implement the broad strategies contained in that document. Over the next four years, MOEF facilitated one of the world's biggest exercises in environmental planning, involving tens of thousands of people from all walks of life (Apte 2006; Bhatt et al 2006). This resulted in a draft NBSAP (then onwards called the Final Technical Report or FTR; TPCG and Kalpavriksh 2005), along with several dozen local, state, regional, and thematic action plans to take account of the enormous diversity of situations in India. By 2004, India should have had a comprehensive NBSAP in place, based on the FTR.

It was only in January 2009, nine years after starting the process, that the MOEF finally released what it calls a National Biodiversity Action Plan (NBAP) (Arora and Bhatt 2008). One would have expected that with such a long gestation period, the product would be well-thought out,

comprehensive, actionable, and innovative. Unfortunately, though well-meaning and making many of the right noises, the NBAP fails on all these counts. Crucially, it barely goes beyond the 1999 macro-level strategy, thus failing to fulfil the mandate of the UNDP million-dollar grant.

Avoiding Specificity, on Purpose?

The NBAP sets out its objectives by stating that it is based on the principles laid out in the country's National Environment Policy (NEP), 2006, a highly contested and controversial document (Kothari and Kohli 2006; Lele and Menon 2005). The drafting of the NEP started around 2004, and the NBSAP process FTR was put on the backburner, on the grounds that the NEP needed to be finalised first.

The NBAP substantially ignores the outputs of the NBSAP process, including the FTR, even though the process gets a cursory one line mention in the introduction. Most tragically, though, in its lack of specificity, the NBAP appears designed to remain on the shelves of government and donor agencies.

It starts with presenting a brief assessment of biodiversity and its status in India, and a few lines of some key threats. Though the analysis is patchy, missing out on some crucial underlying causes such as the centralisation of decision-making in the hands of a tiny powerful elite, or the lack of meaningful citizens' participation, these sections are still useful. There are some glaring errors, e.g., a box on the vulture crisis (regarding the recent decimation of three species of vultures to near-extinction) fails to mention what most scientists now agree to be main cause: Diclofenac, a painkiller used in veterinary practice, which enters vulture bodies from dead cattle. (As an aside, this means that those drafting the NBAP did not take into account the MOEF's own Vulture Action Plan, which prominently mentions Diclofenac and the government's ban on this drug.)

The NBAP then moves into brief descriptions of ongoing activities, which forms most of section 5 in the Action Plan. So a substantial portion of the action plans focuses heavily on what the government is doing, bypassing very many innovative and successful initiatives by communities and non-governmental organisations (NGOs), such as on-farm conservation of

Ashish Kothari (ashishkothari@vsnl.com) and Kanchi Kohli (kanchikohli@gmail.com) are with Kalpavriksh – Environmental Action Group.

crop and livestock diversity, or community-led forest protection. In the same box on vultures, the report ignores the role of groups like the Bombay Natural History Society, which drew nationwide attention to the crisis and coordinated studies that showed the role of Diclofenac.

The suggested strategies and actions follow the description of ongoing initiatives, without an inventory of key gaps. This lack of a gap analysis is not becoming of an NBAP that is meant to be the guiding next steps for systematic and sustained conservation of biodiversity. In many ways, it only weakens the scientific credentials of the NBAP.

Erasing History, Ignoring the Present

The most important part of the NBAP are the 140 “actions”, clubbed under the following heads: conservation of biodiversity in the wild, on farms and offsite (ex-situ), augmentation and sustainable use of bio-resources, managing alien species, dealing with climate change, integrating biodiversity into development, tackling pollution and toxics, building up databases, taking policy and legal measures, developing capacity and using appropriate technologies, utilising economic tools and measures, and achieving international cooperation. An annex lists some key agencies that would be responsible for each strategy and a broad time frame.

Most of the “actions” listed are commendable, some even bold. Some of the preambular text is radical; for instance: “The loss and fragmentation of natural habitats affects all animal and plant species. We need to not only stop any further habitat loss immediately but also restore a substantial fraction of the wilderness that has been depleted in the past.” Bravo! Read in itself and without reference to history, the NBAP could even pass off as progressive.

But history cannot simply be erased, though MOEF has attempted to do so. The NBAP fails to excite, for two key reasons: (1) Most of the “actions” listed are actually broad strategies, with no detail on how they are to be implemented. Indeed, shockingly, 40% of these actions are picked up verbatim from the 1999 macro-level strategy. Though, commendably, there are sections

Box: Ignoring Innovation

Dozens of innovative actions contained in the FTR have been ignored.

For instance, a successful initiative by Deccan Development Society in Andhra Pradesh links the Public Distribution System (see www.ddsindia.com) to local foodgrain production through organic means (rather than relying on long-distance, expensive, wasteful transport of grains from Punjab and Haryana). This has encouraged biologically diverse and ecologically sustainable farming, and significantly enhanced livelihoods for very poor (including dalit women) farmers. The FTR recommended similar actions nation-wide.

Or to shift to another sector: education. The FTR recommended using various means of public transport – trains, buses, planes – as carriers of conservation messages. Millions of people could be reached out to through simple signage, announcements, and messages on tickets or brochures, without skyhigh costs.

Or take the example of large landscapes. Planning in India has been plagued by looking at elements of a landscape (or seascape) as isolated fragments (agricultural fields, pastures, forests, wetlands, mountains, settlements, etc), rather than in an integrated manner. The FTR provided in detail, actions that could link up land and water use across river basins, mountain ranges, and other large ecological units. This would help avoid fragmented planning and decision-making. The NBAP professes that it “takes into account ecosystem approach, where appropriate”, but its strategies do not reflect this other than recommending integrated river basin and coastal management (with no details on how this is to be done).

on climate change and living modified organisms (both issues that are recent), on most fronts it is as if nothing was learnt in the interim 10 years, where the global scenario has only made the challenges more complex. To take one example, the NBAP makes a recommendation to “integrate biodiversity concerns across development sectors (such as industry, infrastructure, power, mining, etc)”. The bracketed text is the only addition to what the 1999 document already said, but there is no elaboration of how the integration can be achieved in each of these sectors. This is what the million dollar grant was for, not to reproduce something already said years back.

(2) The NBAP substantially ignores the FTR that resulted from the 2000-03 NBSAP process. In 2004 the MOEF had explicitly said that the final action plan would be based on the FTR. That promise has fallen by the wayside. Of the FTR’s 100-odd strategies, only about a third appear in the NBAP, with no explanation on why the rest are left out. The FTR also spelt out about 300 specific actions to implement these strategies, most of which are missing from the NBAP (see box for examples). In leaving out such specific actions, MOEF has ensured that the NBAP is a toothless statement of intent, glossy enough to be paraded in international circles, but easy to ignore on the ground.

Let us take again the example of integrating biodiversity into economic sectors. Anyone waving this document in the face of the mandarins at the power ministry, for instance, would get laughed out of the room; even a bureaucrat or minister who feels for the environment, would be blank

about what to do, for the NBAP simply does not say. The FTR actually did say it had several pages of steps that the power, infrastructure, irrigation, agriculture, and other such sectors should take to make biodiversity a central concern. But none of this figures in the NBAP, nor has the MOEF said that it will use the FTR to implement its strategies. Does the MOEF claim that it is not possible for them to implement these, or perhaps they do not fall in line with the government’s agenda of bludgeoning through economic growth at any cost?

Or take the example of the bold statement the NBAP makes about stopping “any further habitat loss immediately”, quoted above. This would have required concrete actions such as, for instance, not allowing any more large-scale diversion of natural forests for mining and dams, or not allowing expressways to cut across remaining natural ecosystems, actions that the FTR contains, but which the NBAP ignores.

It also says: “Promote decentralised management of biological resources with emphasis on community participation”. Well-said. But if this is to be achieved, it needs actions such as amendments in laws and policies, and creation of appropriate institutions at local levels, which empower village assemblies and town wards to meaningfully participate in local decisions. Again, the NBAP does not provide such concrete actions, condemning this strategy to remain a nicely worded intent.

Quite ironically the NBAP supports the modern biotechnology sector, which is essentially based on a monoculture framework. Leave alone the threats and

unexplored risks of these new age technologies, this sector stands in contradiction to the biodiversity which celebrates a variety of life, rather than promote single crop mantras. The NBAP only cursorily mentions bio-safety concerns without giving due regard to the serious ecological, equity, and economic concerns raised by many civil society and farmers' groups.

In line with this, the document also treats traditional knowledge in a somewhat instrumental manner. It insultingly states that such knowledge "has to be scientifically validated through screening for biological diversity for commercially valuable products, so as to make bioprospecting useful and effective". This is an open invitation to biopiracy.

The NBAP also seems to support the dilution of regulatory systems related to development and industrial projects. It refers positively to the most regressive change to the Environment Impact Assessment (EIA) notification in 2006, as being more efficient, transparent and decentralised. Efficiency here can only mean clearing 100 projects a month, without sound appraisal, surely not in any way a biodiversity-friendly process. The plan ignores a number of crucial macro-level strategies that the FTR proposed, which could take biodiversity conservation, sustainable use, and equity into exciting new directions. These include:

- (1) State and national land use plans, backed by a clear policy, which identifies the sites most crucial for India's ecological, water, and food security, and buffers these against destructive development processes such as mining, big dams, and industries.
- (2) A governance regime that combines the best of decentralised, local decision-making (by people closest to the biodiversity and natural resources), with innovative landscape and regional level planning, and institutional reforms in centralised bureaucracies managing forests, wetlands, and other natural resources (some of these are mentioned in general terms, but not integrated and elaborated).
- (3) A fundamental review of the "development" model that we have adopted, especially in the last 15-20 years, which is imperative given all the accumulated evidence about how unsustainable it is.

(For instance, a recent review by the Ecological Footprint Network and CI showed how India is already using twice its biological carrying capacity, causing irreversible damage to soil, water, and natural ecosystems.)

(4) Positive links between culture, conservation, human rights, and other aspects of human life, as also between wild and agricultural biodiversity, all of which are crucial to the maintenance of life's balance and people's livelihoods.

(5) Special measures to empower specific groups such as nomads, artisans, and adivasis who are most dependent on biodiversity, including the provision of tenurial security to land or natural resources.

(6) Legal and policy measures for ecosystems neglected so far, such as marine areas.

Where Are the State, Regional and Local Action Plans?

Apart from the FTR, the 2000-03 NBSAP process also resulted in action plans for every state, for 10 "ecoregions" cutting across states (e.g., Western Ghats, Aravallis, Western Himalaya, etc), for about 20 local sites (ranging from individual settlements to small river basins, or districts), and for several themes (wild flora/fauna, domesticated biodiversity, urban biodiversity, livelihoods, culture, education, etc). During the NBSAP process, MOEF was very

excited about these, and promised to subsequently help with their implementation. UNDP too made similar pledges. But just as it unceremoniously dumped the FTR, MOEF also abandoned these other plans. Their existence is only mentioned in the introduction to the plan without stating if their findings influenced the NBAP or what has become of these. Fortunately, on the strength of the participatory process that produced them, several of these are being taken forward by state biodiversity boards, or civil society and community organisations. Fortunately too, some elements of the FTR are now incorporated into the Eleventh Five-Year Plan finalised in 2008, thanks to several NBSAP participants who were on relevant Planning Commission committees. Additionally, the process generated a number of initiatives that have carried on well beyond the NBSAP period: biodiversity melas or festivals in which farmers and others exchange experiences and resources, networking between communities and scientific organisations and government agencies, newspaper columns for children, and so on (Bhatt et al 2006).

And so from a document (the FTR) produced using the inputs of tens of thousands of people, we now have a NBAP that has been written by two individuals, with almost no public inputs. A draft of the NBAP was put up on the MOEF web site for public

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comments, but clearly this was tokenism, for the final version is almost the same as the draft. Civil society critiques of the draft, submitted to the MOEF and to the prime minister's office, resulted in a small handful of broad strategies (e.g., on education, or on people's participation) being picked up from the FTR and inserted into the NBAP, but the vast majority of the actions in the FTR have remained ignored.

Signs of the Times

The FTR had laid out a concrete institutional structure to ensure the implementation of the action plan. The NBAP talks of implementation taking place through various existing agencies, but does not specify who will coordinate or ensure that agencies do what they are being asked to. It will be instructive to see how MOEF takes forward the NBAP into implementation, but we will not be surprised if the document remains as toothless as the 1999 macro-level strategy.

This is especially so because this whole sorry story needs to be seen within the context of the powerful economic and political forces that are driving the country today. Over the last few years the MOEF has become a rubber stamp for the most destructive and unsustainable process of "development" that has ever been unleashed in India. In this era of globalisation and the race to a double-digit rate of economic growth, ecological concerns (and the interests and rights of communities most dependent on natural resources) are clearly secondary. Both the MOEF, and several environmental regulations, have been systematically re-engineered to provide a thin veneer of greenness to the god of growth (Kohli and Menon 2005; Menon and Kohli 2007). The NBSAP was just another victim of this process, dumped because it recommended uncomfortable steps necessary to reorient the economy and polity towards greater sustainability, accountability, and democracy. The MOEF's NBAP, by contrast,

has been allowed to go through as it falls in line with the status quo, and is a part of the great green cover-up. An expensive fig leaf, billed at a million dollars.

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