

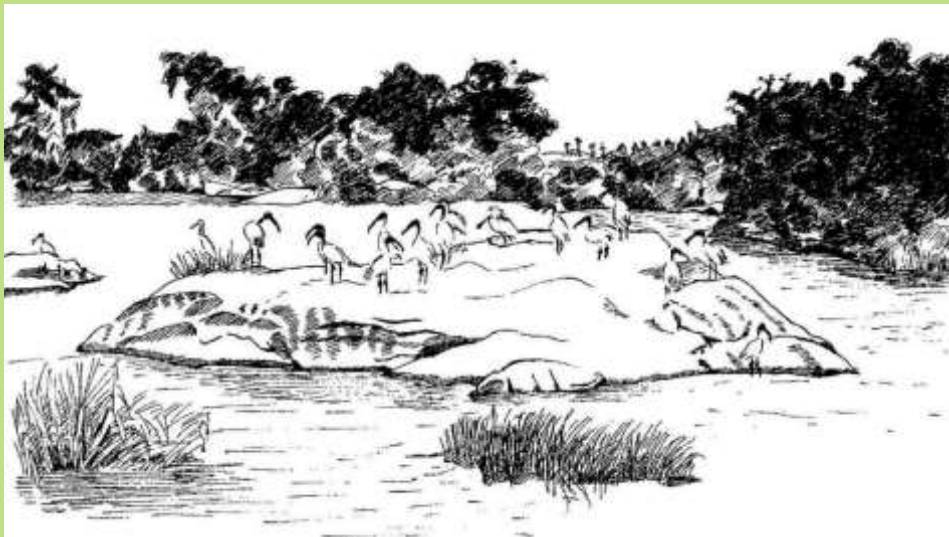
# *CASE STUDIES*

## **BIODIVERSITY ENABLING ACTIVITIES:**

### **India Case Study**

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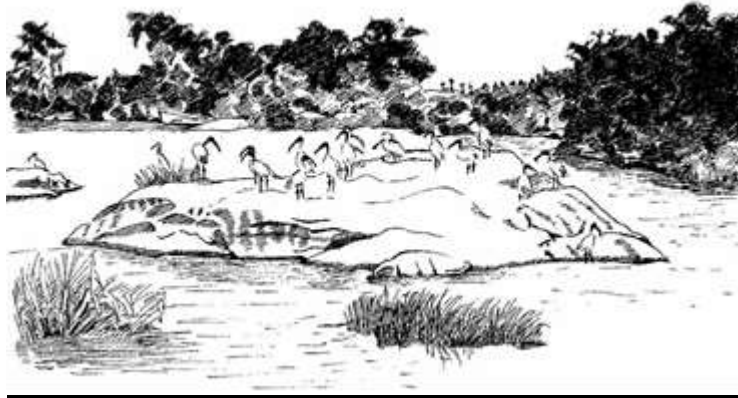
CAS/E&F-Bio/1999



**RaAG**

Research, Assessment and Analysis Group

Report prepared for The Global Environment Facility, Washington DC, March, 1999.



### **Abbreviations**

BAP	Biodiversity Action Plan
BCPP	Biodiversity Conservation Prioritisation Project
BSAP	Biodiversity strategy and Action Plan
BSI	Botanical Survey of India
CBD	Convention on Biological Diversity
COP	Conference of Parties
EA Project	Enabling Activities Project
GEF	Global Environmental Facility
GOI	Government of India
IIPA	Indian Institute of Public Administration
MoEF	Ministry of Environment and Forests, Government of India
NGO	Non Governmental Organisation
PA	Protected Area
STAP	
TOR	Terms of Reference
UNCED	United Nations Conference on Environment and Development
UNDP	United Nations Development Programme
UT	Union Territory
WWF	World Wide Fund for Nature
ZSI	Zoological Survey of India

## A. Background to the Study

Biodiversity enabling activities are defined as “(Activities) that prepare the foundation for design and implementation of effective response measures required to achieve convention (CBD) objectives” [TOR 1998, p.1].

In response to a request from the Conference of Parties (COP), the GEF has made available financial resources to developing country parties essentially to assist in the preparation of the first national report, to build up capacities and to prepare the National Biodiversity Strategy and Action Plan (BSAP).

By May, 1998, the GEF had supported about 115 biodiversity enabling activities covering 120 countries, for a total of over US \$ 37 million. Though it is too early to assess the impact of enabling activities, it is thought that an assessment of experience will provide useful insights on design, implementation and approval processes, including expedited processes, pioneered for enabling activities and how such procedures might be applied to similar GEF activities in the future.

Accordingly, the GEF Monitoring and Evaluation Unit has launched a worldwide study of Biodiversity Enabling Activities. In the context of this study, a team consisting of consultants, GEF and implementing agency staff is visiting countries in Asia, Eastern Europe, Africa, and Central and South America. In addition, for a few selected countries, including India, a national case study is being prepared.

The GEF has approved a sum of US \$ 968,000 to India for preparing a Biodiversity Strategy and Action Plan. The Indian case study focuses on this project with the objectives of documenting its history and assessing its development process and its current implementation. The specific terms of reference are :

*The following activities are to be covered under the assignment and reported:*

- *Get a clear understanding, in relation to the CBD of:*
  - *GOI's understanding of National Reporting requirements under the Convention.*
  - *Adequacy of the project to meet these reporting requirements as well as needs for strategic biodiversity planning.*
- *Document and review the interactions between the various actors involved in project design.*
- *Review related legislation/projects undertaken during 1992-98 to assess whether, together with the new project, they comprehensively cover biodiversity planning needs in India, or is a progress in that direction -- this is to be done at a broad level.*
- *Discuss the earlier and current project with agencies and individuals involved or having relevant expertise/experience as they are related to the current project.*
- *Assess the current project design in light of these, especially in terms of process and appropriateness.*
- *Identify strengths, weaknesses and lessons learned.*

## **B. History of the Project**

The Ministry of Environment and Forests (MoEF), Government of India (GOI) was first informed of the availability of enabling grants by the UNDP Delhi Office in March, 1996. Another letter, on this subject, was addressed to MoEF, by UNDP, in September, 1996. Both these letters mentioned that an amount ranging between US \$ 150,000 to \$ 350,000 could be available.

UNDP again reminded MoEF, in October, 1996, indicating the possible deadline for submitting a request as October, 1996. UNDP, Delhi has clarified that an upper limit of US \$ 350,000 was being indicated as the proposal was being envisaged for accessing project development funds (PDF), which have such an upper limit.

The MoEF subsequently wrote to UNDP, in early December, 1996, indicating their intention to apply for the enabling grant as also for a grant to help them prepare the National Report to be submitted to the COP. The UNDP wrote back, in mid-December, giving the objectives of the BSAP.

Between December, 1996 and September, 1997, the MoEF and the UNDP worked at developing the project proposal. To facilitate this process, the UNDP recruited a full-time consultant in July, 1997. However, despite this, the proposal was not finalised by September, 1997.

As the initial proposal sought assistance for both the BSAP and the national report, the MoEF decided, in September, 1997, to delink the two proposals and to separately seek US \$ 25,000 for preparing the national report. This was perhaps because of the delays in finalising the larger proposal and the urgency to finalise and submit the national report. The smaller proposal of US \$ 25,000, for preparation of the national report, was finally approved and the approval communicated to MoEF in December 1997.

Meanwhile, work continued on the BSAP proposal, which was eventually finalised in March, 1998 and forwarded to GEF Washington in May, 1998.

Unfortunately, though the project was considered by the GEF council in June, 1998, it was deferred at the instance of four member countries because of the sanctions imposed on India. It was again taken up by the GEF Council in October, 1998 and was finally approved.

The project was awaiting final signatures, in Delhi, in the first week of March 1999, but has since been signed.

The initial communication regarding the possibility of posing such a project was made in March, 1996. However, the project was finally signed only in March, 1999, over three years later. Could this period be shortened?

In analysing the history of the project, four phases can be identified.

### **Phase I – March 1996 to December 1996:**

**8-9 months**

It took this much time for the MoEF to indicate its intention to apply for the enabling activity grant. Evidence suggests that this delay was mainly due to the fact that the MoEF was under the impression that the maximum funds available were US \$ 350,000, which was too small an amount to attract them. This is borne out by the fact that the MOEF's attitude changed after they realised that, like Brazil, they could also get a much larger amount for the BSAP. Apparently, this realisation came during discussions with UNDP and GEF officials during COP3, in Buenos Aires (November, 1996).

**Phase II – December 1996 to March 1998:****15-16 months**

This was the phase during which the project was formulated and the project document finalised. Looking at the project document, fifteen to sixteen months seem to be too long a period for its formulation. This is especially so because the project was not formulated through a participatory process, involving a large number of stake-holders. In fact, as will be discussed later, the project was formulated almost exclusively by officials of the MoEF and UNDP-Delhi staff, with the assistance, for some months, of a full-time UNDP consultant.

Also, the data and thinking reflected in the proposal were already available to the MoEF in December, 1996, especially as various reports had already been completed and various committees had sat or were sitting to deliberate on all these matters.

It is difficult to determine whether the inordinately long time taken in formulating the proposal was due to some special circumstances or just the result of inevitable bureaucratic delays. Though there is evidence of extensive consultations between the MoEF and UNDP, in this period, the pace of project formulation remained painfully slow. Notes made by the UNDP consultant, who worked on the project, suggest that he experienced difficulty in meeting MoEF officials, getting information from them and learning about other relevant initiatives and activities.

**Phase III – March 1998 to October 1998:****7-8 months**

This was the time taken from project finalisation to project approval. Part of this delay was presumably due to the fact that because of the size of the project, it was processed like a full GEF proposal, conforming to all GEF project requirements including a STAP review, GEFOP approval and GEF Council approval. However, significant delay occurred because of deferment in June, 1998.

**Phase IV – October 1998 to March 1999:****5-6 months**

This is the time it has taken, from GEF council approval to the signature of the project document. Whereas, under GEF procedures, 15% of the funds can be accessed as soon as a project is approved by the GEF council, a delay of 5-6 months in a 24 month project needs to be analysed. In the Indian case, this might not matter as the GOI has not yet accessed even the 15% funds available. However, in certain situations it could be critical.

Considering the same project was finally passed in October 1998, while the situation had not changed and the sanctions against India were still in position, perhaps more could have been done in June, 1998 itself to ensure that the project was not delayed. Given the scope of the sanctions, this project hardly merited deferment.

**Conclusion**

In conclusion, it can be said that the three years it took for project formulation, approval and operationalisation, is too long a period. This is especially so given the nature of the project document, the amount of information and

expertise already available in India, and the methodology adopted for project formulation.

Delays could also have been prevented, in phase 1, if the total picture, laying out all the options, could have been made clear to MoEF right from the start. If the MoEF had known that they could apply for a larger grant, this might have saved eight or nine months. Also, the grant available to each country for preparation of BSAP should not be rigidly fixed but should be determined on the basis of a formula, which takes into account the size and biodiversity richness of a country. Even large grants, as required by countries like India, should be able to avail the “fast track” clearance procedures. Otherwise, there is a bias against larger countries.

Perhaps expecting an already overworked MoEF and a similarly overworked UNDP to find adequate time to prepare the proposal was unrealistic. Both with the objective of speeding up preparation and widening the discussion, it would have been preferable to set up a small committee of experts who could have been assisted by MoEF/UNDP. Such a model has been followed for other GEF projects, with good results. The committee should have had, as members, individuals who had enough personal standing to get the required access to MoEF officials and data and a familiarity with past and ongoing activities and processes relevant to biodiversity conservation.

### **C. Project Formulation Process**

As already mentioned, India’s Biodiversity Enabling Activity Project (EA Project) was formulated almost exclusively by officials of the MoEF and UNDP staff, assisted for a while by a UNDP consultant. There was little involvement of other ministries of GOI, of state governments, of NGOs, institutions or experts outside these two agencies. There was not even a committee set up to formulate the proposal.

Given the nature and scope of the proposal, on the face of it this appears an inappropriate process. This is especially so because the proposed EA Project seeks to involve other departments and ministries of GOI, state governments, NGOs, institutions, experts and others in the process of formulating the BSAP. Surely if all these people are to be involved in the project they might have been consulted in its formulation.

Sometimes the need to quickly finalise a document makes it difficult to formulate it in a participatory manner. However, considering it took 15 to 16 months to formulate the proposal, no such consideration could have weighed on the minds of MoEF. Therefore, the lack of participation seems inexplicable. Infact, most of the experts (outside the MoEF) consulted during this study were not even aware of this project.

However, having said this, it must also be acknowledged that prior and concurrent to this project formulation exercise, many other consultations were being organised by MoEF in the area of biodiversity conservation. In all of these, issues pertinent to this project were being discussed. A list of some of these consultations and processes was provided by MoEF and is given below.

**Chronology of some important activities undertaken relating to preparation of National Action Plan on Biodiversity by MoEF from 1994 onwards**

<b>January 1994</b>	After an interministerial meeting held under chairmanship of Secretary (E&F) on 31.12.93, it was decided to initiate action for preparing a comprehensive legislation on Biodiversity, and a National Action Plan on Biodiversity
<b>February, 1994</b>	A group of experts identified for preparation of National Action Plan on Biodiversity.
<b>February 1994 to Sept. 1995</b>	Seven meetings of the Group held under chairmanship of the Additional Secretary.
<b>June, 1995</b>	Based on the inputs of the Group of Experts, a first draft document prepared in June 1995.
<b>April, 1996</b>	After wide-ranging discussions, the draft document was revised considerably and a presentation of the National Action Plan was made by MoEF during the GEF meeting in Vigyan Bhawan.
<b>May, 1996-Dec. 1996</b>	Consultations with BSI/ZSI, other experts. Inclusion of a chapter on Policy.
<b>March, 1997</b>	Circulated the draft document to all State Governments/Union Territories, experts, NGOs, Ministries/Departments, agencies etc.
<b>10 June, 1997</b>	Organisation of National Consultation on Biodiversity.
<b>July -Dec., 1997</b>	Revised the draft, based on inputs received in National Consultation and written comments received.

Source: MoEF

## **Conclusions**

Therefore, even though the MoEF did not see it fit to discuss this project proposal with a wider audience, it certainly had access to the thinking and views of NGOs, experts and institutions. The important thing, therefore, is whether these views and thoughts were reflected appropriately in the EA proposal. As will be discussed later, to a great extent they were.

However, many of the existing gaps in the EA project and many of the delays in its formulation could have been avoided if a more participatory process for formulating the proposal was followed.

### **D. The EA Proposal and its Appropriateness**

In order to assess the appropriateness of the proposal, it is important to first review the work already done in India, which is relevant to the formulation of the BSAP.

The project document lists some of the relevant activities (projects, reports and legislation) that are prior or concurrent to the project. These include:

- National Report (Implementation of Article 6 of the Convention on Biological Diversity in India), 1998
- Draft BAP, ongoing
- National Biodiversity Act, ongoing



- The Environment Action Programme, 1993
- The National Wildlife Action Plan, 1983- currently under revision
- National Forestry Action Plan, 1996?
- Ecodevelopment Project, ongoing
- Other GEF Projects, ongoing
- Biodiversity Conservation Prioritisation Project (BCPP), 1996-1999

In actual fact, over the years there have been a large number of consultations, studies and reports on various aspects of biodiversity. Though the project document lists only those that were or are being undertaken by the MoEF (except for the BCPP), even this list is not complete. There are, of course, many more done by other Central Government agencies, state government agencies, and by NGOs and expert institutions. Though it might not be possible and useful to provide a comprehensive list here, some of the more pertinent ones are being listed below, with occasional descriptions.

### *Consultations and Studies on Biodiversity Conservation*

The concern for Biodiversity *per se* is recent, at least in its idiom. Historically, much of what is talked about today as biodiversity conservation was covered under wildlife conservation. Perhaps the first comprehensive gap analysis for ecosystems was done by WA Rodgers and HS Panwar, at the Wildlife Institute of India, in the mid 1980s. This was published in 1988 and assessed the adequacy of the protected area system in India in terms of its coverage of different biomes, biogeographic provinces, zones and realms. Though it only looked at the gaps in the PA system, it brought out, perhaps for the first time, the level of protection the various ecosystem types were getting in India. Close on its heels, in 1989, was published a management assessment of the PAs in India, by the Indian Institute of Public Administration, New Delhi. This study, sponsored by the MoEF, documented the management status of India's PAs and listed the various threats that biodiversity within them faced.

Also sponsored by the MoEF and the Wildlife Institute of India, the IIPA brought out a national Directory of PAs (1984) and, subsequently, Directories of PAs of Himachal Pradesh, Andaman and Nicobar Islands, and Karnataka (1990-1995).

Meanwhile, the MoEF had set up a Core Committee to develop a national strategy for conservation and sustainable development. The report of this committee was published in 1990, with significant recommendations for biodiversity conservation.

In 1990, the MoEF set up a committee, chaired by Secretary(E&F), to prepare a Status Report on Biodiversity Conservation. Various inputs were received by this committee and, in 1991, the MoEF asked the IIPA to collate all these inputs and prepare a Status report and a chapter on strategic directions.

Subsequently, the MoEF commissioned the IIPA to undertake additional research and prepare a comprehensive status report. These were prepared and submitted to the MoEF in 1993-94. In 1992, the IIPA also prepared a briefing paper and an assessment of legal coverage for biodiversity conservation for the MoEF, as background material for the Rio Conference.

Also in 1992, the Centre for Environmental Education, Ahmedabad, prepared, for the MoEF, the National Report to UNCED (June, 1992), titled

*Environment and Development: Traditions, Concerns and Efforts in India.* The MoEF also organised, in December, 1992, an Expert Level Consultation on Conservation of Biological Diversity.

In 1992 the MoEF initiated a process to formulate the Environment Action Program for India, sponsored by the UNDP. As a part of this exercise, the IIPA was sponsored to produce a report on Biodiversity, which was integrated into the final GOI report published in 1993. The MoEF also sponsored, in 1992, the MS Swaminathan Research Foundation to organize a series of workshops for policy makers on the conservation and sustainable management of biological diversity. The foundation also published, in 1992, a report on *Biodiversity: Implications for Food Security*.

In 1994, the MoEF constituted another committee to finalise the National biodiversity Action Plan. The outputs of this committee were handed over to the Forest Survey of India, which compiled these and brought out a draft national Biodiversity Action Plan in 1995. This was discussed by the committee and additions and changes were suggested. Therefore, the process to finalise the Action Plan and Strategy continued and culminated with the draft National Policy and Action Strategy on Biodiversity, which is currently awaiting formal government clearance.

Concurrently, the Planning Commission, in preparation of drafting the eighth plan, had set up a steering group under the Chairmanship of Prof. M.S.Swaminathan. The Steering Group came up with a detailed report that included an in-depth analysis of the status of biodiversity conservation in India. Subsequently, in its eighth plan document (1992-97), the Planning Commission also focussed on biodiversity planning and laid out a broad strategy for its conservation. The Ninth Plan (1997-2001), recently finalised, also talks about methods for conserving biodiversity.

Some of the State Governments also took an initiative and many of them set up state environment and/or biodiversity boards, notably Himachal Pradesh, Punjab, Madhya Pradesh, Gujarat and Kerala. Some state level assessments of biodiversity also began appearing. For example, the Karnataka Planning Board produced a biodiversity status report and action plan for Karnataka, titled *Operationalising Karnataka State Biodiversity Policy* (1996). WWF India also produced biodiversity profiles for Arunachal Pradesh and Jammu and Kashmir.

In this period, the GOI was also reviewing national policy and law. In 1992, the GOI approved the National Conservation Strategy and Policy Statement on Environment and Development. The Wild Life (Protection) Act was amended in 1991. An exercise is on to formulate a national biodiversity act.

Even outside the MoEF, various activities were being undertaken. Perhaps the most comprehensive exercise to prioritise for biodiversity conservation was initiated by WWF India, along with a consortium of NGOs, under the Biodiversity Conservation Prioritisation Project (BCPP). Over a hundred NGOs and institutions got together to prioritise from among species and sites and to identify priority conservation strategies, both at the micro and macro levels. For sites and species, this exercise has covered the whole country and, for micro strategies, it is based on work over two years in 59 village clusters of two or more villages each, in eight sample states and union territories of India. The BCPP prioritises both at the national state levels, for all ecosystem types and for priority species. It also describes the preferred village level strategies for biodiversity conservation, as identified by the

villagers themselves, and the resultant changes that need to be brought about in state and national level policies, laws and programs.

### *Coverage and Gaps*

In order to prepare a comprehensive biodiversity strategy and action plan for India, various types of information and processes are required. A review of completed and ongoing activities might, initially, suggest that most or all of what is required has already been done. However, a closer look and detailed discussions with experts, suggests that at least the following gaps exist.

1. Most of the past and ongoing studies and exercises are at the national level. Barring recent initiatives in Karnataka and a few other states, the involvement of state governments has been peripheral. This is particularly significant, as biodiversity cannot be conserved without the involvement of state governments.
2. Even at the national level, the involvement of other ministries and departments, and of the Planning Commission, was peripheral and notional. Whereas other agencies, especially the Planning Commission, and Ministries of Agriculture, Rural Development and Science and Technology, were also involved in planning for biodiversity conservation, there was little co-ordination and joint planning with the MoEF. Other ministries and departments, whose activities and programs had a profound impact on biodiversity, especially Ministries of Water Resources, Human Resource Development, Industry, Tourism, Mining, Transport, Finance, and Defence were hardly involved in the process of biodiversity conservation planning and action.
3. Though these studies and processes were using and generating a large volume of data, there was little effort at trying to reconcile and authenticate diverse data-sets.
4. The MoEF made efforts to widely discuss these issues, through workshops and committees. However, given the criticality of the issues involved, the discussions were not wide enough. For example, those most significantly affected by strategies and action plans for biodiversity conservation are the rural communities, especially those living in and around wilderness areas. They are also the most important stake holders, without whose cooperation biodiversity cannot be saved. However, little of the national debate has so far involved them.
5. Much of the focus of past and ongoing studies and committees has been on the ecosystems, species and landscape features that need to be conserved. There has been little focus on how they are to be conserved, especially in terms of grass roots strategies that are fair and workable.
6. Though some effort has been made to look at the socio-economic and fiscal dimensions of conservation, much more attention needs to be given to these aspects.

These, then, are some of the gaps that the enabling project needs to fill in order to be appropriate. Discussions with various experts brought out the fact

that these were also some of the main concerns that had emerged in the various consultations organised by the MoEF.

### *Assessment of the EA Project*

The justification of the EA project for India is based on the fact that, despite a lot of things having happened, there still remain some important gaps in the preparation for drafting a National Biodiversity Strategy and Action Plan. Its appropriateness, therefore, can be judged by how comprehensively it covers these gaps.

#### 1. Involvement of State Governments.

Almost all the experts with whom the project document was discussed felt that this was a top priority. It was thought that, as many exercises had already taken place at the national level, one focus of the EA should be to enable state governments to assess their own biodiversity status and conservation needs, and develop appropriate strategies and action plans. They should, ofcourse, do this in collaboration with state level experts, NGOs and institutions. Happily, the EA project document also sees this as a priority activity. It says (p 4-5): “..this process is best carried out at the level of states. The Gol intends that each of the 25 States and 7 Union Territories assess their biodiversity resources and develop strategies and plans to ensure its conservation and sustainable use.”

The document goes on to specify a methodology for doing this. It says (p 10): “The planning process in each state will be coordinated by a lead agency nominated by the state government. In each state, experts from cross sectoral departments will participate in the planning process along with NGOs, scientists and local governments.”

However, when one looks at the budget, there appears to be no budgetary provisions for supporting state level activities. Though some funds (\$120,000) are available for sub-contracts, the document indicates that these would be given out by the Project Manager, in consultation with the national/state nodal agencies, to institutions/organisations and consultants (p 30). Where, then, are the resources for the nodal agencies? Besides, the amount budgeted is hardly adequate for 32 states and UTs.

Considering that many of the states have or are in the process of setting up state councils or boards to plan for and oversee the implementation of environmental and biodiversity conservation initiatives, it might be desirable to give these bodies the responsibility of preparing the state BSAP. The funds of the EA could be made available to them. They would, ofcourse, involve local NGOs, Institutions and experts. An advantage of this would be that an institutional structure would come into position not just to formulate the BSAP but to facilitate its implementation.

#### 2. Involvement of Other Central Ministries and Agencies

Again, this is an explicit objective of the EA project. On p4 it says: “Responsibility for integrating environmental concerns into sectoral plans lies with the Central Planning Commission..” However, the only methodology mentioned is the setting up of a steering committee (p9) with representation of the Planning Commission and other ministries. Considering that integration of biodiversity concerns into other sectors is an explicit objective of article 6 of

the CBD, much more than this is required. Besides, the experience with earlier such committees has been that there is poor attendance from other ministries and agencies, who are often represented by junior functionaries without proper briefing.

It is important to keep all concerned ministries and agencies, at central and state levels, involved in this process right from the beginning. This can only be done if there is substantive and not just notional participation by these agencies. As the Planning Commission has the role of 'integrating environmental concerns into sectoral plans', it might be persuaded to take up this exercise through its sectoral divisions. Discussions with the Secretary, Planning Commission suggest that the Commission might be willing to play this role, if called upon to do so.

A concurrent assessment, through special studies, can be made of the actual and potential sensitivity to biodiversity concerns, of schemes and programs of various sectors.

### 3. Authentication and Reconciliation of Data

The Zoological Survey of India, the Botanical Survey of India, the Forest Survey of India, the Central and State Pollution Control Boards, and innumerable other government and non-government agencies and institutions, universities, colleges, and individuals collect data relevant to biodiversity conservation. Data regarding socio-economic factors relevant for biodiversity conservation are also similarly collected. However, there is no serious attempt to authenticate and reconcile all these data and to do a proper gap analysis. Consequently, data once mentioned in a document, whatever their authenticity, get repeated over and over again and often form the basis of significant decisions. Also, even a cursory look at various documents shows the wide variations and even contradictions between different data sets. There is, therefore, an urgent need to arrive at a set of scientifically accepted methodologies for data authentication and, using these, to authenticate various data-sets and reconcile differences and contradictions. On the basis of such an exercise, a gap analysis needs to be done so that missing or weak data-sets crucial to biodiversity conservation can be identified and focused on.

The EA Project document mentions this as an objective (p 8) when it says: "The first level will be stocktaking and assessment of biodiversity information at the state level...The second level would will be stocktaking and aggregation of information at the national level, analysis of this information and its reconciliation with the state-level BSAPs. " However, the methodology by which this would be done has not been spelled out. Nor has any explicit budgetary provision been made for this.

### 4. Widening Participation and Discussion

In order for the BSAP to reflect the myriad complexities and diversities of India, and to have a chance of being accepted and owned by various stake holders, it is essential that the process of its formulation is as participatory as possible and certainly involves all the major stake-holders. This is also, clearly, an important objective of the EA Project, In various pages it states: "The BSAP....will be developed through a participatory planning process

involving all major stake holders”(p 1); “The BSAP would be developed through a broad-based participatory planning process” (p 8); etc.

The project document also outlines the methodology for invoking participation, which is mainly to be done through workshops and consultations. The budget also reflects adequate allocations for holding such workshops and consultations.

However, one concern that remains is that such a process would involve primarily urban professionals. These professionals have already been involved in some of the earlier consultations organised by the MoEF. Though the number of professionals involved might increase, it would still be more of the same. What is critically needed is to involve various grass roots activist groups and, through them, a sample of rural communities.

Briefing documents of national and state level concerns can be prepared, outlining proposed strategies and action plans. These can be disseminated, through grass roots organisations, to rural communities who can discuss these and send back their own concerns and preferred strategies. These can then be compared to the national and state level proposals and an optimal interface worked out.

Such an exercise has recently been tried out in eight states and union territories of India, under the BCPP, where community biodiversity registers were established and local perceptions recorded. Perhaps lessons can be learnt from these and other initiatives and the coverage expanded to cover all the states and UTs of India. However, adequate budgetary provisions need to be made for the purpose.

## 5. Developing Grass Roots Conservation Strategies

We know far more about what to conserve and where to conserve, than we know about how to conserve. National and state level strategies of conservation must build upon and be a synthesis of micro level strategies that have been found optimal and effective. To do this, the BSAP exercise must take into consideration ongoing conservation initiatives and debates, such as joint forest management initiatives, the ecodevelopment approach and other community based conservation efforts. It must also consult with village communities to determine what would work best and how to make national and state policies, programs and laws supportive.

The earlier suggested exercise at the community level could also facilitate this process. However, the project must see this as a priority and make adequate budgetary provisions to that end.

## 6. Socio-economic and Fiscal Dimensions of Biodiversity Conservation

This is, again, addressed as a priority in the project document. For example, the document states (p 8): “ Existing studies on valuation of biodiversity and data from primary resource sectors- agriculture, fisheries, forestry, tourism, etc. will be analysed to estimate direct and indirect use values of biodiversity”. However, though this would help provide a macro sectoral picture, it is equally important to assess and analyse the dependence of the common person, living in and around wilderness areas, on biodiversity resources. Such an analysis would not only bring out the real social and economic value of biodiversity but also demonstrate the types of alternatives and incentives that are needed to ensure sustainable use of biodiversity.

Specific methodologies and budgetary provisions would be needed for this.

## **Conclusions**

A close study of the project document reveals that, in its objectives, it addresses most of the gaps identified. Though the methodologies for achieving many of these objectives have not been explicitly stated, the project document does specify that detailed methodologies would be developed in a participatory manner.

The main weakness in the project document appears to be its budgetary proposals. On the one hand, it does not appear to support the proposed methodology of having lead institutions at the state level prepare state BSAPs. A large proportion of the resources are earmarked for national level activities and national professionals. Explicitly, nothing is allocated for the state governments and their lead agencies and, even if, the amount earmarked for sub-contracts is to be used for funding state level activities, it is too small, in absolute terms, and too small a proportion of the whole. Therefore, in this respect, the budget does not reflect the priorities underlying the rest of the proposal: that of building up the national BSAPs from state level BSAPs.

The budget also does not seem to allow for other priority activities like the involvement of local communities in the process and the prioritisation of local level conservation strategies.

Perhaps the objectives of the project would be better served if the MoEF considered recasting the budget and making a bulk of the funds available for state level and community level activities. Some resources could also be made available for meaningfully involving other central ministries and agencies into the process.

It is obvious that the size of the grant (\$ 968,200) is far less than what would be required, even if the suggested changes were made. However, as the MoEF and other agencies are, even without this project, undertaking many of the activities that this project envisages, there could be a closer coordination of these various initiatives. Payments to national consultants could also be curtailed and the resources so saved could be used for village level consultations.

## **Lessons learnt:**

### *Lesson Learnt:*

Guidelines about the process by which the project is to be formulated must be very specific and must adequately take into consideration well known bureaucratic constraints.

### *Lesson Learnt:*

The process of project formulation can be speeded up if :

1. Information regarding options and choices is provided, in full, as early as possible, to the concerned countries.

2. The size of the enabling grant is not rigidly fixed but determined in accordance with a formula which takes into consideration the size and needs of a country. All such proposals should be dealt with on the “fast track”.
3. Detailed guidelines are issued regarding the process of formulation of the proposal. Such a process must not expect over-worked bureaucracies to find time to speedily design such projects. Also, such processes must be participatory and transparent.
4. National consultants assisting in the process must be chosen from among those who are well aware of the relevant on-going processes in the country and who have the personal standing to be able to interact appropriately with the government and the UNDP.



# ANNEXURE



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GOVERNMENT OF INDIA

MINISTRY OF ENVIRONMENT & FORESTS

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लोदी रोड, नई दिल्ली-110003

LODI ROAD, NEW DELHI-110003

May 3, 1999

Dear Prof. Singh,

Thank you for sending a copy of your draft Report on Biodiversity Enabling Activities – India Case Study, enclosed with your letter dated 7<sup>th</sup> April, 1999.

2. We have examined your Report. We very much appreciate some of the useful suggestions made by you specially in the sections dealing with "Conclusions and Lessons Learnt". We would however, like to point out certain facts for your consideration:

- (i) It is mentioned on page 2 that the MOEF was first informed of the availability of enabling grants by the UNDP in March 1996, followed by another letter in September 1996 and a reminder in October 1996, but the MOEF responded only in early December 1996 indicating their intention to access the grants. The fact is that the UNDP's letter to the subject matter division of MOEF informing of the funds availability is dated 26<sup>th</sup> September, 1996 and MOEF's response letter to UNDP is dated 3<sup>rd</sup> October, 1996.
- (ii) It is mentioned on page 3 that the project formulation and finalisation of the document took 15-16 months (December 1996 – March 1998). The fact is that after MOEF communicated its willingness to access the funds on 3.10.1996; the discussions for preparing the project actually started only after UNDP appointed a consultant for this purpose in June 1997 initially for 3 months, extended later by another 3 months. The concerned officials of the MOEF devoted considerable time with the UNDP consultant during this period, even though they were hardpressed for time, since during that period extensive work through consultations was going on for biodiversity legislation, Action Plan, Biosafety etc. We are surprised with the observations made by the UNDP consultant that he experienced difficulty in meeting MOEF officials, and obtaining information from them, or that this could be because of 'inevitable bureaucratic delays' mentioned on page 3 of the report.

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- (iii) Contrary to what has been mentioned by the UNDP consultant, it is the subject matter division of the MOEF, which had been kept in dark by the UNDP about the project after the term of the consultant was over. It is only about a fortnight ago that the subject matter division received a copy of the approved and signed document of BSAP project from UNDP.

From the facts mentioned above you will note that MOEF did not cause delay in expeditious processing of this proposal.

3. You have mentioned in your report that MOEF did not involve State Governments and other Central Ministries/Departments while formulating this project. We would like to point out that very detailed series of consultations were held by the Ministry with NGOs, State Governments, eminent experts and others. In fact on page 5 of your draft Report you have given a chronology of some important activities undertaken for preparation of National Action Plan on Biodiversity from 1994 onwards. As can be seen from the information in your Report these consultations were extensive, wide ranging, and the inputs received were incorporated in the BSAP Project.

4. In the section dealing with "Coverage and Gaps" you have pointed out the need for involving States more proactively in this exercise. We agree that States must closely and totally involve themselves with BSAP project. In a federal system like ours no field level project can function successfully unless the States totally endorse it and effectively execute the project. We agree that adequate budgetary provisions for supporting State level activities should be made.

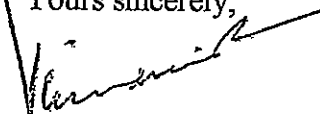
We also generally agree with the suggestions made regarding authentication and reconciliation of data by utilising the services of BSI, ZSI, FSI and other agencies. The importance of developing grass root conservation strategies is also well recognised.

All the aspects mentioned above would be taken care of during the operationalisation of the project. The methodologies have not been explicitly stated as these details would need to be worked out by the National Project Director and got approved by a National level Steering Committee. The fact that a National Action Plan in Biodiversity, which gives the broad framework and guidance in regard to the gap areas, has already been prepared should be seen as a point of strength, particularly because this has been drawn by the MOEF without waiting for any assistance of GEF, considering it as part of its overall national responsibility. It remains to be seen as to what extent the proposed project would help MOEF in filling up the gap areas.

5. We observe that most of the lessons learnt relate to GEF improving its overall approach towards such projects. It would certainly help developing countries to clearly know the details of the options and choices available to a particular country at the earliest possible. Such proposals should be dealt on "fast track" basis and the size of the enabling grant should be determined in accordance with a formula which takes into consideration the size and needs of the country and there should be enough room for flexibility vis-à-vis the overall requirement of funds for the country. It is also expected that guidelines must be transparent, realistic and participatory. We must most certainly actively involve all major stakeholders, specially at the grass root levels. However the funding arrangements for actual conservation effort at the grass root level need to be also known so that unnecessary expectations are not aroused at the field level.

6. You may like to incorporate some of our suggestions in the final report that you prepare on this subject. We would be happy to have a copy of the same for our information and record.

With regards,

Yours sincerely,  
  
(Vinod Vaish)

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