

## MoEF/MoTA Committee on Forest Rights Act

### Implementation of Forest Rights Act in MADHYA PRADESH: Report of field visit, 20-24 May 2010

Devendra Pandey and Sharachchandra Lele

**Note: This report is written for the purposes of the Committee's ongoing work; any views contained in this are not necessarily those of the entire Committee and are not to be taken as final views or recommendations by the Committee**

### Overview

MP is one of the states to take up FRA implementation in a mission mode, and has devoted substantial resources (about Rs 11 crores from the State budget and Rs 5.5 crores central assistance) and attention to the exercise. The implementation is being done in about 30,000 gram sabhas of the State. The use of GPS-enabled survey methods and creation of computerized databases of the beneficiaries are some of the novel features. Consequently, by 30 June 2010, Madhya Pradesh had processed about 4 lakhs FRA claims against which 121,466 claims had been approved (97,192 title deeds issued), 255,103 claims rejected, and rest are pending at various levels. The percentage of rejection is very high for claims submitted by Other Traditional Forest Dwellers (OTFD) (98%).

The positive features notwithstanding, much more ground remains to be covered and there are also several lacunae in the manner of implementation so far.

1. There has been no substantial progress on Community Forest Rights. The claims being reported under CFR category are either pertaining to sec.3(2) (diversion to non-forest purposes) or claims to minor public spaces such as burial sites, cattle grazing, threshing grounds, ponds, or sacred sites. There is a lot of confusion in the minds of the implementing agencies between development rights and CFRs. There is also lack of awareness about the CFR provision among local communities.
2. There has been no attempt to initiate the process of claims in and around Protected Areas, or to take up the demarcation of Critical Wildlife Habitat through a public process. Similarly, the special cases of forest dwellers displaced by development projects (sec. 3(1)(m)) have not been addressed at all.
3. There are a number of cases of 'omission' w.r.t. individual claims, including process not having started at all in interior areas, claims 'lost' by FRCs and not transmitted to next level and not reflected in the monitoring system at all, or FRCs refusing to entertain claims.
4. In several cases, the grounds for rejection are invalid, such as "land being reserved for settling Bangladesh refugees", or are often not mentioned.
5. A major flaw in terms of process is that rejections have not been communicated to the claimants, so that they may appeal the case if they wish to. Hence there are only a few cases of appeals to SDLC or DLC.
6. Also in terms of process, the detailed participatory process as laid down in the Act and Rules has not been followed in reality. Gram Sabha meetings have not really

happened, and discussions on the claims have not taken place in the Gram Sabhas. The process is entirely driven by government officials and a major role is played by the forest department officials in the field.

7. The interpretation of criteria for accepting claims has been selective. In Forest Villages, OTFDs have been given title deeds in some cases even when they settled in the village only ~50 years ago. But this relaxation is not happening for OTFDs elsewhere.
8. The government has not completed the process of mutation of land records for house and cultivation title deeds that have been handed out. Even Forest Villages, which are specifically required to be converted as per the Act to revenue villages, have not been so converted.

## Visit Programme and Sources of information

A two-member team of the FRA committee, consisting Devendra Pandey (co-chair) and Sharachchandra Lele, visited the state during 20<sup>th</sup> to 24<sup>th</sup> May 2010 to assess the situation regarding the implementation of the FRA and issues arising out of it. The field visit mainly covered villages in Khandwa, Burhanpur and Harda districts. The Tribal Welfare Department provided full logistic support for the visit and considerable cooperation was provided by the Forest and Revenue departments. The committee's programme went as follows:

20<sup>th</sup> May: Indore

- a. Arrival Indore in the evening.
- b. Informal meetings with CCF Indore, DCF Indore
- c. Meeting with two persons from local NGO

21<sup>st</sup> May: In Khandwa खंडवा district

- a. Formal meeting with the DC and other district officials in Khandwa DC's office.
- b. Field visit to revenue village Kumatha कुमठा (in sub-division Pandhana पंधना), a village with high rejections, including field verification of one claim
- c. Field visit to Forest Village Dhakana ढाकना, tehsil Khalwa खालवा, sub-division Harsud हरसूद.
- d. Meeting at the Circuit House, Khandwa in the late evening with a group of about 100 people claiming to be evicted from nearby forest village Nandwa नान्दवा (block छेगांव)

22<sup>nd</sup> May: In Burhanpur बुरहानपुर district

- a. Village level meeting at Forest Village Chandani चांदनी, block Khaknar खकनार
- b. Village level meeting at Revenue Village Jhanjar झांझर (high rejections), block Neapanagar नेपानगर,

- c. Meetings at Burhanpur Forest Rest House with villagers from other parts of Burhanpur district
- d. Village level meeting and field verification in Revenue Village Baroli, Ichchhapur Panchayat, block Burhanpur, (last village bordering Maharashtra)

23<sup>rd</sup> May: In Harda हरदा district, and Betul बैतुल district

- a. Village level meeting and field visit in Forest Village Dhega डेगा (in मुंडाभूरु hamlet), block Timarni टिमरनी, district Harda हरदा (visit organized by Anurag Modi, Shramik Adivasi Sangathan)
- b. Meeting at village Bhora on Betul-Hoshangabad road enroute to Bhopal with representatives from
  - i. Village Kachhaar कछार, block Shahpur, district Betul बैतुल
  - ii. Village Mankadhana मनकाढाना, block Ghodadongri घोडाडोंगरी, district Betul
  - iii. Village Danwakheda दानवाखेडा, block Gholadongri, district Betul
  - iv. Kisan Adivasi Sanghathan/Samajwadi Jan Parishad, village Kesala केसला, district Hoshangabad होशंगाबाद (including representatives of people displaced by Tawa Dam)

24<sup>th</sup> May: Meetings in Bhopal:

- a. Meetings with civil society groups, including
  - i. Madhuri Krishanswamy, Jagrit Adivasi Dalit Sangathan जागृत आदिवासी दलित संगठन, Badwani
  - ii. Rajesh Bhadori, Madhya Pradesh Lok Sangharsh Sajha Manch
  - iii. Khedut Majdoor Chetana Sangh खेडुत मजदूर चेतना संघ, Alirajpur
  - iv. Nitin Diwan, Tarashi, support NGO working in 3 districts
  - v. Rajesh Yadav
  - vi. Vivek, Vikalp विकल्प, working in Kanha National Park
  - vii. Mata Dayal, Birsa Munda Bhoo Adhikar Manch बिरसा मुंडा भूअधिकार मंच, Rewa district
  - viii. Vinod Pateria, Nadi Ghaati Morcha नदी घाटी मोर्चा, Dindori
  - ix. Siya Dulari, Samaj Chetana Adhikar Manch समाज चेतना अधिकार मंच
  - x. Uma Chaturvedi (inputs over phone)
  - xi. Rakesh Diwan, Tehelka newspaper
- b. Meeting with Principal Secretary Tribal Welfare (Dr.Birdi) and Commissioner Tribal Welfare.

Additional information was obtained from village-wise summaries provided by district officials, district-wise summaries and a compilation of materials provided by

the Tribal Welfare Department, and independent studies and submissions made to the committee.

## Observations and Analysis

1. Background: Madhya Pradesh is one of the most important states vis-à-vis the implementation of the Forest Rights Act 2006, because a) it is home for a large population of Scheduled Tribes and Other Forest Dwellers (22,600 villages are considered forest dependent, including at least 1 crore STs), b) it has a large area of forest lands (~95,000 sq.km), c) it has had a history of conflicts between state agencies and forest dwellers over forest rights, d) it has a range of unsettled areas (e.g., orange areas), several hundred forest villages, and so on. One would therefore expect a large number of cases for individual rights, and also expect substantial claims for community forest rights. MP also has a large number of Protected Areas, its people have suffered displacement under various dam projects, and the ST population includes a number of Primitive Tribal Groups, so one would expect special efforts to address these issues under the special provisions in the Act.
2. Individual Rights: Progress made so far: The state has made a significant effort at implementation of the Individual Rights under the act. The state has approached this in a mission mode, with an internal target of completing the process in 6 months (a goal set by the Chief Minister), thereby giving a big push to implementation. (The latest deadline for completion of FRA implementation set by the state is 30 June 2010, although this administrative goal has been misunderstood as a final cutoff—see below). It started awareness building activities even before the Rules were promulgated, and launched implementation within days after the Rules came into force, i.e., January 2008. A large number of claims have been filed (~4.0 lakhs by 30 June 2010) and processed 87% of them. It has used GPS technology (through personal digital assistants—PDAs) for mapping the boundaries of a large fraction of the approved claims and has built a state-wide digital database of these approved claims and claimants, including photographs, copies of pattas, etc. which can be accessed by government officials.
3. Individual Rights: Limitations in outcomes: In spite of the abovementioned efforts, there are significant shortfalls and lacunae in the implementation that need to be addressed urgently. These lacunae are both of outcome and of process. Since the FRA is attempting to change both the distribution of rights but also the process of forest governance, both outcome and process aspects become important. First, about outcomes:
  - a. Coverage not complete, many areas missed: A number of remote villages have not been reached. E.g., villages in Betul on the border with Chhindwara district, or remote parts of Alirajpur. No process has been initiated at all in these parts.
  - b. Claims ‘misplaced’: Claims filed by villagers, for which they have acknowledgement, are not showing in government records at all. In Dhega village, where villagers showed receipts but their claims were not to be found in either accepted or rejected list. It is happening in at least Alirajpur and Rewa districts and also Dhega village in Harda, where the number of claims for which acknowledgements have been issued by the GSs is

greater than the number in the government list. We suspect this to be happening in many areas.

- c. Claimants discouraged from filing: The administration has often taken the short-cut of using the 1993 ‘list of encroachers’ provided by the Forest Department as the list of legitimate claimants under FRA. As a result, in the field, many potential claimants who may not be in this list are told that they are not eligible. For some claimants the area is reduced since they were cultivating less area in 1993. At the same time, this list is not available to the public to substantiate their claims.
- d. Inappropriate grounds for rejection: While some of the rejections are clearly on valid grounds (people claiming rights to land that is not actually being cultivated)<sup>1</sup>, we also found cases where the grounds for rejection were either not given at all or were inappropriate. For instance, in a village in Betul, the reason was given as “land identified for resettling refugees”, which cannot be reason (since clearly the land had not been occupied by refugees but by tribals). Since rejections are not being communicated (see below) and right to appeal has not been explained, these rejections are not being re-examined.
- e. Rights of displaced persons not addressed: Madhya Pradesh has a large number of communities or persons affected by dam-related displacement, e.g. Sardar Sarovar, Tawa dam, Narmada Sagar, Omkareshwar dam, etc. Several of these people did not get properly resettled, and many of them are living on encroached lands in various parts of the district. Specific cases of Tawa and Omkareshwar oustees were brought to our notice.
- f. Rights of communities in and around Protected Areas not addressed: The FRA process has simply not been initiated in and around Protected Areas, in spite of the categorical requirements laid down in the Act.
- g. Special cases of PTGs, Mankars, Nayaks, Banjaras: There are significant numbers of people belong to primitive tribal groups (PTGs) in Madhya Pradesh, but there has been no attempt to address the special problems they face and special provisions made for them in the Act vis-à-vis right to habitat. Similarly, communities like the Mankars, Nayaks and Banjaras are effectively tribal, but not designated as STs due to some quirks of fate. The state has not addressed their situation.
- h. General neglect of OTFD claims and some very selective acceptance: A review of the data provided by the state shows that although 1.33 lakh claims were submitted by OTFDs, only 1868 claims had been approved and the rest were rejected. Also noteworthy is that these acceptances are primarily only in 4 districts: Burhanpur, Bhopal, Seoni and Dindori. In other districts, the rejection rate is 100%. Our field verification showed that in one Forest Village (Chandni, in Burhanpur), some OTFDs were given pattas even though they did not meet the 75 year criterion, (they had moved there nearly 50 years ago, when the Forest Village was settled/re-settled). But in another Forest Village (Dhega), the applications of 29 Gowlis, who have been living there and cultivating land (and also involved in dairying) for about 30 years were rejected. The reasons for OTFD claim

---

<sup>1</sup> Case of Kumatha village, Khandwa district.

rejections in most places were that they could not prove 75 years residence & cultivation. We conclude that a) there has been no attempt by the state to figure out how 75 years residence can be proved (usually old settlement records can be useful), b) no attempt properly apply the MoTA guideline about how to interpret the clause ‘residing in and dependent upon forest land’, and c) selective relaxation in a few places for reasons that are not made clear<sup>2</sup> and not applied uniformly. At a policy level, the question of whether OTFDs are required to prove 75 years of residence in the village or also 75 years of cultivation of forest land, and whether such a requirement is fair to many non-ST but poor communities (such as Scheduled Castes) needs to be re-examined.

4. Community Forest Rights claims have not been made at all. We did not come across a single claim filed, let alone processed, that pertained to community rights over forest. The claims listed in FRA monitoring data under CFR category by the government all pertain to either requests for forest land diversion for developmental activities (sec.3(2)) or minor claims for access to community graveyards, ponds, temples, etc, averaging to 1.5 hectares per claim<sup>3</sup>. In spite of some circulars issued from Bhopal, frontline Tribal Welfare officials are not at all cognizant of the CFR provisions (they continue to think development rights are same as CFRs). They admitted that they did not make any efforts to publicise this provision or to facilitate the filing of CFR claims.
5. Serious lacunae in process: The entire exercise has been done in a mission mode, with the objective of processing and finishing off the claims exercise. But the Act has a strong focus on process as well, and only an adherence to process will ensure proper implementation in cases that are complicated or outside the mainstream. Moreover, activation of the Gram Sabha and autonomous functioning of the FRCs is required for the long-term governance of community forests as spelt out in the Act. We observed that:
  - a. Non-effectiveness of FRCs and GSs: In most places, the FRCs are non-functional. The secretaries of the FRCs are simply signing on the claims forms without applying their minds, sometimes on blank forms that are filled out later on. The FRCs are not involved in verification of claims—it is typically the Forest Department’s staff and maybe Revenue Department staff. The so-called resolutions passed by the Gram Sabhas are mostly on paper, without any real meetings or due deliberation by the adult general body of the village.<sup>4</sup> The constitution of FRCs is also often a flawed process, with JFM committees becoming FRCs.<sup>5</sup> Although MoTA reiterated that 2/3<sup>rd</sup> of the general body has to be present for quorum of Gram Sabha to be fulfilled, this is clearly not happening.<sup>6</sup>
  - b. Unfulfilled role of Tribal Welfare department: The Act envisages the Tribal Welfare department (TWD) as the nodal agency to initiate and facilitate implementation, precisely because of the long-standing conflict

---

<sup>2</sup> It appears that the FD championed the case of the OTFDs of Chandni.

<sup>3</sup> Information provided by Dept of Tribal Welfare, MP, in response to specific query.

<sup>4</sup> This can be seen from the fact that ALL applications submitted to the FRC have been passed on to the SDLC in almost all the districts.

<sup>5</sup> When asked, several villagers did not know the difference, and the presidents were the same for both.

<sup>6</sup> Prin.Secy, admitted as much in his presentation (page 270 of volume 2 of वन अधिकार compilation).

between the Forest Department and the forest-dwelling communities. To discharge this role, the TWD is required to play a role *independent* of the Forest Department and to act as a champion of (ST and other) forest dwellers' rights. This means that providing forms, providing inputs, facilitating form-filling, facilitating screening, etc. should be done only by the TWD, not the FD. But in fact, the work has been done largely by either FD's frontline staff (Forest Guards) or Revenue frontline staff or Panchayati Raj staff (such as Secretary of Gram Panchayat). These people are then exercising their power in various ways, including selective facilitation, demanding bribes for filling and forwarding forms, etc.<sup>7</sup> The TWD also has not gone out and identified potential claimants and publicized the act amongst them.

- c. Denial of rights through incomplete process: Although the fraction of rejections is quite high (2.5 lakhs out of 4 lakhs), we found no evidence that the rejection decisions had been systematically conveyed to the claimants, and that they had been told about their right to appeal within 60 days. We found no evidence of appeals having taken place, which is quite surprising and indicative of lack of information, not lack of disagreement with decisions of the SDLC or DLC.
- d. Misleading cutoff date: Everywhere, villagers and activists are under the impression that there is a cutoff date for filing claims, and that date is 30 June 2010. This date was a revised version of the cutoff date announced by the MP government for completing the mission. But the Act does not specify or permit any such time limit.<sup>8</sup>
- e. Forest villages not converted to Revenue villages: Although the process of accepting individual claims in Forest Villages has been initiated, the conversion of Forest Villages (वन ग्राम) into Revenue Villages (राजस्व ग्राम) has not yet taken place. Title deeds have been given individually, but it is not clear whether all residents are receiving rights (in fact, they are not), and also the common land within the village is not being converted to revenue land.
- f. Mutation of land records not happening: More generally, the process of mutation of land records is not being completed, so that the lands to which pattas have been issued are remaining as 'forest lands' in the records (and in fact not entering the database of the land records and survey settlement (भू अभिलेख एवं बन्दोबस्त) agency. Although the rules clearly specify that this mutation has to take place, the MP government appears to have passed the responsibility back to MoTA by asking for directions.<sup>9</sup> Moreover, given that neither the forest boundaries nor the revenue boundaries in MP state's land records have been digitized and geo-referenced, the PDA-based survey and sketch of these lands has generated

---

<sup>7</sup> We received enough complaints about illegal demands for money for filling forms and forwarding claims from sufficiently different locations that there has to be truth in them.

<sup>8</sup> All it says is that there will be a period of 3 months for accepting claims after the GS has issued a notice calling for claims, and that this period can be extended by the Gram Sabha.

<sup>9</sup> Presentation by O P Rawat, Prin.Secretary TWD, at National Workshop to formulate Post-Implementation Action Plan held in 2008?, see page 209 of volume 2 of वन अधिकार compendium.

limited benefits. Unless these PDA-derived sketches are somehow linked to existing land records, they will not be of much value. Similarly, there is no evidence that the DLCs are using remote sensing data to verify the ground situation of 2005 where the claims are being contested or decisions appealed against.

- g. Forms for Community Forest Rights: The TWD distributes both forms together (individual claims and community claims), so claimants are filling both forms and submitting them, although the community claim form is to be filled only by the Gram Sabha or FRC. Moreover, the pattas for community rights are being issued in the name of the persons who lead the community claim process, rather than in the name of the Gram Sabha or village.
- h. Non-availability of evidence: Forest offence cases constitute an important potential piece of evidence of cultivation or occupation of forest lands. But several claimants (especially those who have been affected by floods, fire, repeated evictions, etc) have indicated that they do not have these documents, and are not getting access to Forest Department records to obtain copies. may not have these documents with them. But access to Forest Department records is not being given to the public.

6. Continuing conflicts between local communities and Forest Department:

- a. One of the most difficult elements of the implementation process is the question of how the Forest Department is to deal with those that it sees as “post-2005 encroachers”. The Act does not give rights to those who encroached forest land after December 2005 (in case of STs) or even earlier (in case of non-STs). The Act does specify that ‘no person shall be evicted or removed from forest land under their occupation till the recognition and verification procedure is completed’. In practice, there is enormous gray area here. For instance, it is not clear if the ‘completion’ has to be at the village level/ block level/ district level or state level. At the same time, the Secretary (Forests) of MP has issued instructions<sup>10</sup> to forest officials that “those who were evicted from forest land before 31 Dec 2007 should not under any circumstances be allowed to encroach again”.
- b. Moreover, forest officials are in theory authorized to ‘prevent’ any fresh encroachments. The problem is in determining what constitute ‘fresh encroachers’, what constitutes ‘prevention’ and what constituted ‘legal eviction’ in the past. There is ample evidence that Forest Department has not followed due process in the past and cannot be depended upon to fairly address these complicated questions. There are also many allegations of false cases, of illegal eviction or continued prevention of cultivation by those in occupation of forest lands for several years, and in general of Forest Department high-handedness, which require very serious attention.
- c. At the same time, the danger, and even actual occurrence of, fresh encroachments is undeniable, especially after the enactment of the

---

<sup>10</sup> Circular from Secretary (Forests) dt.21 Jan 2008 (page 26 of vol.2 of वन अधिकार compilation )

FRA 2006. It is well known that certain tribal communities (such as Barelās) from western MP (Badwani, Jhabua, etc. which are largely denuded), have over the years moved in large numbers into the forests of Khargone, Burhanpur and Khandwa, driven by poverty and led by leaders (locally called Nevadia Patels) who organize the encroachment process—a process not necessarily supported by the local tribal communities of the area. One such group (led by one Mr. Nathu Patel) met us en masse at Khandwa. They claimed they had been cultivating forest land in Nandwa village since 1960s, and had been recently evicted by the Forest Department. But they could present any evidence of previous or ongoing cultivation and many members admitted to being landholders from different villages and to have recently joined the group. .

- d. Given the above, we believe that the only way forward would be putting in place an impartial monitoring and grievance redressal mechanism at all levels (sub-division, district and state) that involves civil society groups also. Currently, there is a lack of civil society involvement, especially of those groups that are known to have put in many years of grassroots work on these issues.
7. Shortfall in monitoring and grievance redressal: Apart from the specific issue of continuing conflict over ‘encroachment’ and over the functioning of the forest department in general, we observed that there was no independent monitoring and grievance redressal mechanism in place to which individuals and grassroots groups could turn for immediate redressal. E.g., FRA ‘adaalats’ on a monthly basis in district headquarters, or ‘sunwais’ at various places could provide quick identification of grievances and feedback that goes beyond reports provided by line agencies themselves.

## **Some Immediate Recommendations**

While certain issues may require to be dealt with at the national policy and legislative level, there are many steps that the state government can and should take immediately to address the above lacunae. These are summarized below, and their essence has already been communicated to the TWD.

1. Increasing reach:
  - a. An immediate circular and public announcement needs to be issued that there is a no deadline for submission of claims, and that those missed out in the rounds so far are still entitled to submit claims, and also those whose claims have been rejected due to inadequacies, can resubmit. If necessary, GS resolutions extending the deadlines for submission should be sought.
  - b. Special efforts need to be initiated to spread awareness and bring in the claims of those living in remote areas.
  - c. Details of each claim (whether accepted, rejected or in process) should be put up on a public website so that each claimant can find out where his/her claim has reached, and so that those whose claims have been ‘misplaced’ and are not in the system at all can bring this problem to the attention of

authorities. Even circulating gram sabha-wise total claims filed would be a first step, but individual claim lists need to be circulated too.

2. Improving process:
  - a. All rejected claims must reach the claimant, along with **clear reasons of rejection** in local language (proper ticking of options, or adding other reasons), and along with clear indication of the procedure that is still available to the claimant to make an appeal against the rejection.
  - b. When individual claim forms are distributed, they should not be accompanied by the form for community rights.
  - c. The lists available with the forest department of 1980 encroachers, 1993 encroachers, and forest encroachment offenses (esp. post 1993) should be made public so as to act as possible sources of evidence for claimants, but directions must be issued to ensure that the 1993 list does not become the sole basis for filing individual claims.
  - d. More generally, TWD should ensure that its staff approach villagers directly in all remote and forested areas as far as possible and not through the Forest Department to avoid the possible bias. For this purpose, TWD may have to recruit extra staff and train them separately.
  - e. A public, independent and easily accessible grievance redressal process must be put in place immediately to invite and address the kinds of complaints that came before this team. Special efforts should be made to independently investigate complaints of ongoing eviction of potential claimants.
3. Re-examining outcomes: Special teams including civil society activists should be constituted to investigate areas with high rejection rates, and especially the very high rejection of OTFD claims. The clarifications issued by MoTA regarding the 'residing on forest land' criterion, and other such clarifications, need to be kept in mind when re-examining rejection cases. Although the MoTA has indicated that the DLC's decision is final, the TWD can ask the DLCs to reconsider their decisions where they have been based on incomplete information or incorrect application of criteria.
4. CFRs: The TWD needs to take up the issue of CFRs afresh. TWD should educate and guide the tribal communities about the provisions and benefits of CFR as per the Act. Genuine CFR claims have not been received (or in a few cases are being prevented from being filed). The input and involvement of grassroots groups and activists who have been active on the question of community forestry (as distinct from JFM) will be crucial in this regard, and needs to be actively sought to work out a strategy for spreading awareness and getting forest dwellers to exercise this right.
5. Conversion of Forest Villages to Revenue Villages must be pursued *in toto* (not on the basis of individual claims alone) and should be carried to completion. Clarifications and instructions must also be issued so that in all forest lands where claims have been accepted, mutation of records to convert those patches into revenue land and given them khasra numbers etc is completed.
6. Addressing the complicated cases: The state may consider setting up dedicated task forces to understand and address the following categories of cases:

- a. Communities living in wildlife sanctuaries and National parks, where rights need to be first recognized and then the Critical Wildlife Habitat concept needs to be properly implemented.
  - b. Groups or households displaced by development projects, which did not get proper compensation and ended up encroaching on forest land.
  - c. The needs of Primitive Tribal groups, such as Baigas, who have great difficulties in understanding the implications of the act, who do not follow mainstream concepts of individual land rights, and are located in remote areas.
7. The **inputs of grassroots activists** and other groups working for a long time in tribal areas or representing non-partisan tribal interests; such as those listed above, are critical to the success of the implementation. These groups provide the reach into remote areas that is currently lacking in the TW dept. They need to be brought into the process at all levels as advisors and watchdogs. The state-level Monitoring Committee needs to include key persons from such groups, and this SLMC needs to play a much bigger role, and become the steering committee for implementation.