Empowered lives.
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Guidance for Submitting a Request to the Social and Environmental Compliance Unit (SECU) and/or the Stakeholder Response Mechanism (SRM)

Purpose of this form

- **If you use this form, please put your answers in bold writing to distinguish text**
- **The use of this form is recommended, but not required. It can also serve as a guide when drafting a request.**

This form is intended to assist in:

(1) Submitting a request when you believe UNDP is not complying with its social or environmental policies or commitments and you are believe you are being harmed as a result. This requestcould initiate a 'compliance review', which is an independent investigation conducted by the Social and Environmental Compliance Unit (SECU), within UNDP's Office of Audit and Investigations, to determine if UNDP policies or commitments have been violatedand to identify measures to address these violations. SECU would interact with you during the compliance review to determine the facts of the situation. You would be kept informed about the results of the compliance review.

and/or

(2) Submitting a request for UNDP "Stakeholder Response" when you believe a UNDP project is having or may have anadverse social or environmental impact on you and you would like to initiate a process that brings together affected communities and other stakeholders (e.g., government representatives, UNDP, etc.) to jointly address your concerns. This Stakeholder Response process would be led by the UNDP Country Office or facilitated through UNDP headquarters. UNDP staff would communicate and interact with you as part of the response, both for fact-finding and for developing solutions. Other project stakeholders may also be involved if needed.

Please note that if you have not already made an effort to resolve your concern by communicating directly with the government representatives and UNDP staff responsible for this project , you should do so before making a request to UNDP's Stakeholder Response Mechanism.

Confidentiality If you choose the Compliance Review process, you may keep your identity confidential (known only to the Compliance Review team).

If you choose the Stakeholder Response Mechanism, you can choose to keep your identity confidential during the initial eligibility screening and assessment of your case. If your request is eligible and the assessment indicates that a response is appropriate, UNDP staff will discuss the proposed response with you, and will also discuss whether and how to maintain confidentiality of your identity.

Guidance When submitting a request please provide as much information as possible. If you accidentally email an incomplete form, or have additional information you would like to provide, simply send a follow-up email explaining any changes.

Information about You

Are you…

1. A person affected by a UNDP-supported project?
   Mark "X" next to the answer that applies to you: Yes: **X** No:

2. An authorized representative of an affected person or group?
   Mark "X" next to the answer that applies to you: Yes: **X** No:

If you are an authorized representative, please provide the names of all the people whom you are representing, and documentation of their authorization for you to act on their behalf, by attaching one or more files to this form.

Representing majority of the people in the IHRML project area as the Member of Parliament (Lok Sabha), Idukki Constituency, Kerala. Hence no separate authentication is required.

3. First name: **Adv. Joice**

4. Last name: **George**

5. Any other identifying information: **Member of Parliament (Lok Sabha) representing the people in the India High Range Mountain Landscape project area.**

6. Mailing address: **VP/10/175E, Idukki Colony P.O., Cheruthony, Idukki, Kerala**

Flat No. 38, South Avenue, New Delhi 110011

7. Email address: **joicegeorgeadv@gmail.com, idukkimpjoice@gmail.com**

8. Telephone Number (with country code): **+91 9447506900 (Mob)**

9. Your address/location: **VP/10/175E, Idukki Colony P.O., Cheruthony, Idukki, Kerala**

   Flat No. 38, South Avenue, New Delhi 11001

10. Nearest city or town: **Ernakulam**

11. Any additional instructions on how to contact you:

12. Country: **India**

What you are seeking from UNDP: Compliance Review and/or Stakeholder Response

You have four options:

- Submit a request for a Compliance Review;
- Submit a request for a Stakeholder Response;
- Submit a request for both a Compliance Review and a Stakeholder Response;
- State that you are unsure whether you would like Compliance Review or Stakeholder Response and that you desire both entities to review your case.

13. Are you concerned that UNDP's failure to meet a UNDP social and/or environmental policy or commitment is harming, or could harm, you or your community? Mark "X" next to the answer that applies to you: Yes: **X** No:

14. Would you like your name(s) to remain confidential throughout the Compliance Review process?
    Mark "X" next to the answer that applies to you: Yes: No: **X**

    If confidentiality is requested, please state why:

15. Would you like to work with other stakeholders, e.g., the government, UNDP, etc. to jointly resolve a concern about social or environmental impacts or risks you believe you are experiencing because of a UNDP project?
    Mark "X" next to the answer that applies to you: Yes: **X** No:

16. Would you like your name(s) to remain confidential during the initial assessment of your request for a response?
    Mark "X" next to the answer that applies to you: Yes: No: **X**

    If confidentiality is requested, please state why:

17. Requests for Stakeholder Response will be handled through UNDP Country Offices unless you indicate that you would like your request to be handled through UNDP Headquarters. Would you like UNDP Headquarters to handle your request?

    Mark "X" next to the answer that applies to you: Yes: **X** No:

    If you have indicated yes, please indicate why your request should be handled through UNDP Headquarters:

    Initial discussions with Kerala State Government and UNDP officials are over with no commendable outcomes. The Forest Officials, both in Centre and State and some of the UNDP Country officials are acting as hand and glove in manipulating records while preparing the project dossier with an intention to commit fraud on the people. Hence interventions from UNDP headquarters is required.

18. Are you seeking both Compliance Review and Stakeholder Response?
    Mark "X" next to the answer that applies to you: Yes: **X** No:

19. Are you unsure whether you would like to request a Compliance Review or a Stakeholder Response? Mark "X" next to the answer that applies to you: Yes: **X** No:

    Both Compliance Review and Stakeholder Response, as falsification documents and fraud on people are involved.

Information about the UNDP Project you are concerned about, and the nature of your concern:

20. Which UNDP-supported project are you concerned about? (if known):

    India High Range Mountain Landscape Project (IHRML) – Developing an effective multiple-use management framework for conserving biodiversity in the mountain landscape of the High Ranges, the Western Ghats, India

21. Project name (if known):

India High Range Mountain Landscape Project (IHRML) – Developing an effective multiple-use management framework for conserving biodiversity in the mountain landscape of the High Ranges, the Western Ghats, India

22. Please provide a short description of your concerns about the project. If you have concerns about UNDP's failure to comply with its social or environmental policies and commitments, and can identify these policies and commitments, please do (not required). Please describe, as well, the types of environmental and social impacts that may occur, or have occurred, as a result. If more space is required, please attach any documents. You may write in any language you choose:

The Kerala Forest Department (KFD), Ministry of Environment & Forests, submitted a detailed project report to UNDP and GEF on 29th August 2013 for the CEO endorsement. The said project Document was purportedly prepared on the basis of the inputs gathered from a stakeholder workshop held at Munnar on 12th March, 2013. As a matter of fact, the representatives of the people and other stakeholders of the project area participated in the workshop were not informed about the IHRML Project and its objectives. According to Mr. S. Rajendran, Member of Legislative Assembly representing Devikulam Constituency, the meeting was convened for discussing about the tourism development of Munnar and its surrounding areas as told in the meeting. Among the 144 participants, 60 persons were forest watchers, drivers and KFD officials. The minutes of the stakeholder workshop held on 12th March 2013 is a fabricated one created for the purpose of meeting the prerequisites for the project preparation.

The representatives of the people of the project area have strong reservations against the manner in which the project was conceived, finalized and forwarded to the donor agency. The project proposal itself is a fraudulently conceived one. The total project area is within the jurisdiction of 34 Grama Panchayaths, the Local Self Government (LSGD) institutions having constitutional recognition and none of them were invited for the workshop except two. The particulars and statements incorporated in the project document are factually incorrect and contrary to the true state of affairs. The legal status of the lands in the project area is also wrongly stated to give the impression that the area covers vast track of Protected Areas including Reserve Forests. The minutes of two discussions with Government of Kerala, UNDP officials and Peoples Representatives in the Project Area are attached as Appendix I and II.

There is suspicion regarding the manner in which the KFD managed to get a letter from the President of a planters association offering $ 1000,000/- contribution and the said organization is one of the signatories in the representation requesting withdrawal of the project (Appendix III). There was no discussion/deliberation among the various government departments to facilitate the convergence of funds under various schemes as part of IHRML.

23. Have you discussed your concerns with the government representatives and UNDP staff responsible for this project? Non-governmental organizations?
Mark "X" next to the answer that applies to you: Yes: **X** No:

If you answered yes, please provide the name(s) of those you have discussed your concerns with

Name of Officials You have Already Contacted Regarding this Issue:

First Name	Last Name	Title/Affiliation	Estimated Date of Contact	Response from the Individual
Dr. Ruchi	**Pant**	**Program Analyst Energy & Environment Unit UNDP, India**	**10.02.2015**	**No commendable response**
Sri. G.	**Padmanabhan**	**Emergency Analysis and OICDM Unit UNDP, India**	**27.03.2015**	**No commendable response**
Smt. Gitika	**Goswamy**	**Technical Officer UNDP, India**	**27.03.2015**	**No commendable response**

24. Are there other individuals or groups that are adversely affected by the project?
    Mark "X" next to the answer that applies to you: Yes: **X** No:

25. Please provide the names and/or description of other individuals or groups that support the request:

First Name	Last Name	Title/Affiliation	Contact Information
[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]

[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]

All other individuals/political parties/organizations/planters associations who have active role and representation in the project area

Please attach to your email any documents you wish to send to SECU and/or the SRM. If all of your attachments do not fit in one email, please feel free to send multiple emails.

Submission and Support

To submit your request, or if you need assistance please email:project.concerns@undp.org

We are not able to receive phone calls at this time and apologize for the inconvenience.

For more information, please visit www.undp.org/secu-srm

APPENDIX I

OFFICE OF THE FIELD DIRECTOR PRO KOTTAYAM

GOVERNMENT OF KERALA

No. 1445/D2/2015/F&WLD(1)

Forests & Wildlife (D) Department
Dated: 03.03.2015

FD(PT) Kottayam

Section	A2
	10/3/15
S.S	
A.A	
T.A	
F.D	

The Additional Chief Secretary to Government

Adv. Joice George , M.P
Paliyath House
Thadiyampadu P.O,Idukki, Kerala

Sri S Rajendran, M.L.A
Ikka Bhavan
Ikka Ngar, Munnar P.O,
Idukki. PIN - 685612

Sri. Roshy Augustine,M.L.A
Cherunilathu chalil
Idukki Colony P.O
Vazhzthope, Idukki. PIN-685 602

Sri K.K Jayachandran,M.L.A
Kunnathu Veedu
Kunchithanni P.O
Idukki. PIN-685565

Sri V.P Sajeendran,M.L.A
Valliyothumala
Kolencheri P.O
Ernakulam. PIN-682311

Sri T.U Kuruvila M.L.A
Thombrayil House
Choladu P.O
Kothamangalam,
Ernakulam. PIN - 686681

Dr.B.S Corrie,IFS
The Principal Chief Conservator of Forests &Head of Forest Forces
Thiruvananthapuram

Sri G Harikumar,IFS
The Principal Chief Conservator of Forests (Wildlife)
Thiruvananthapuram

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Sri O.P Kaler, IFS
Additional Principal Chief Conservator of Forests (BDC)
Thiruvananthapuram

Sri Amit Mallick, IFS
Field Director
Project Tiger
Aranya Bhavan, Forest Complex
S.H Mount P.O., Kottayam

Sri Sanjayan Kumar,IFS
Deputy Director
Periyar East Forest Division
Kumili, Thekkady P.O., Idukki

Dr. Ruchi Pant
Programme Analyst,
Energy and Environment Unit
United Nations Development Programme,
55, Lodhi Estate, New Delhi-110003

Sir,

Sub:- Forest & Wild Life Department - Meeting on India Highrange Mountain Landscape Project scheduled to be held on 27/03/2015 - Reg.

Ref: Minutes of the meeting held on 10.02.2015

I am directed to forward herewith copy of the Minutes referred above for kind information.

Yours faithfully,
P. VIJAYACHANDRAN
Deputy Secretary
For Additional Chief Secretary to Govt.

Approved for issue,

Section Officer.

APPENDIX I

MINUTES OF THE MEETING CONVENED BY HON'BLE MINISTER FOR FORESTS AND WILDLIFE, GOVERNMENT OF KERALA ON INDIA HIGH RANGE LANDSCAPE (IHRL) PROJECT, MUNNAR HELD ON 10TH FEBRUARY 2015

Present:

Adv. Joice George , M.P

Sri T.U Kuruvila M.L.A

Sri S Rajendran, M.L.A

Sri. Roshy Augustine,M.L.A

Sri. P.K.Mohanty IAS, Additional Chief Secretary (Forests)

Dr.B.S Corrie, IFS
The Principal Chief Conservator of Forests &Head of Forest Forces, Thiruvananthapuram

Sri G Harikumar,IFS
The Principal Chief Conservator of Forests (Wildlife) , Thiruvananthapuram

Adv. (Dr.) Ruchi Pant
Programme Analyst, United Nations Development Programme, New Delhi

Sri. Pramod Krishnan
Conservator of Forests(Wildlife), Palakkad

Sri O.P Kaler, IFS
Additional Principal Chief Conservator of Forests (BDC), Thiruvananthapuram

Sri Amit Mallick, IFS
Field Director, Project Tiger, Kottayam

Sri Sanjayan Kumar,IFS
Deputy Director, Periyar East Forest Division, Idukki

1) The meeting commenced at 10.30 am with Chief Secretary, Government of Kerala (GoK) on the chair. The Additional Chief Secretary, Forests and Wildlife, GoK welcomed the Hon'ble MP and MLAs. The Chair explained the purpose of the meeting and invited Hon'ble MP to initiate the discussions.

2) The Hon'ble MP Advocate Joice George recalled the events leading to the present meeting. He argued that he is not against Forest Conservation, but interest of the people is the foremost and this has to be protected. In this circumstances there is a huge

apprehension about the project. The project can not be allowed to be continued without removing the people's apprehension.

3) Adv. Joice George MP, further remarked that his apprehension is not merely on expansion of the PA network but is based on a series of incidents which culminated in the IHRL Project. In the process, he expressed his opinion on the status of Cardamom Hill Reserve, affidavit of the Chief Secretary in the Supreme Court, World Heritage Tag, Ecologically Fragile Land, notification of four Shola National Parks, Kasturi Rangan's Report and issues relating to creation of buffer around PAs. He also raised apprehension about the Tiger Conservation Plan of Periyar Tiger Reserve. He further opined that he is not against conservation however, any conservation project without active consultation with the people and people's representatives will remain in paper and cannot be implemented. He wanted a revisit of the Project Document.

4) Then Sri. Rajendran, Hon'ble MLA alleged that during 2012 he was a participant of the Stakeholder's Meeting and the 14th signatory. In that meeting there were 144 participants of which 44 were Forest Department Watchers. The outcome of the meeting became an Annexure of the Project. The real project was never discussed with the people or people's representatives. Sri. Roshy Augustine and Sri. T.U. Kuruvila, Hon'ble MLAs expressed that this is the first time they are getting an opportunity to air their views on the project.

5) Sri. Rajendran, Hon'ble MLA of Munnar reiterated that although he had participated in the Stakeholder's Workshop he was unaware of the fact that the Project would be formulated based on the said Workshop and posed for external funding. He denied having given any consent to the Project during the Stakeholder Workshop. He also insisted that the minutes of the stakeholder workshop in which he had participated should be withdrawn. He also insisted that no project activity should be taken up till a concrete decision is taken involving stakeholder consultation.

6) Sri. Roshy Augustine and Sri. T.U. Kuruvila, Hon'ble MLAs also expressed that the Project needs the acceptance of all stakeholders and unless everyone is taken on board the project will not succeed. They also stated that although consultation for the

project had commenced during 2012, they were kept in the dark. So the project may be withheld till agreement is reached.

7) After due deliberations, the Chief Secretary suggested that a stakeholder consultation meeting on the IHRL Project can be done and all concerns with regard to the Project can be addressed before actual implementation of the Project in the field.

8) In the meantime, the Hon'ble Minister for Forests and Wildlife joined the meeting. The Chief Secretary briefed the Hon'ble Minister about the discussions. Having heard the views of the Hon'ble MP and MLAs, Hon'ble Minister stressed that it is necessary to take at the issue without preconceived views. He pointed out that the people are already dissatisfied by Kasturi Rangan Report and as such it is natural that they may have apprehension about this project also and therefore it is essential to address their apprehension by keeping them informed of the details of the project. Chief Secretary also emphasized that it is necessary to win the confidence of the people before going ahead with it. He also informed that a grant-in-aid development project for the betterment of living standards of cultivators and other stakeholders and for conservation of biodiversity is welcome. He further prompted the UNDP representative to throw more light on document of IHRL Project. Dr. Ruchi Pant representing UNDP informed that the Project Document is flexible to the extent that the stakeholder concerns can be incorporated and amendments made within the overall budget limit. The Additional Chief Secretary informed that already work for baseline studies have been awarded to various research institutions within and outside Kerala for facilitating the implementation of the Project. After listening to all participants the Hon'ble Minister opined that there is a definite need to understand the Project, to reach on consensus on the components of the project and owning the implementation of the Project. To conclude the deliberations he also suggested to have a presentation on the Project and to decide on a convenient date.

After due deliberations, the following decisions were taken:

APPENDIX I

1. A PowerPoint Presentation on the Project would be made at Thiruvananthapuram on 27th March 2015 at 3 PM. The participants of this meeting and other people's representatives shall be invited to attend.

2. All project related activities including the ongoing studies shall be put on hold till 27th March 2015.

3. With regard to other issues raised by Hon'ble MP and MLAs the following decisions were taken.

    a. Idukki-Udumbannoor Road, a road constructed long before the Forest (Conservation) Act, 1980 (Maniyarankutty-Kaithapara Section) shall be permitted to be tarred with the existing width. Head of Forest Force will take further action in this regard.

    b. Retaining wall construction in NH-49 (Neriyamangalam-Adimali portion) shall be allowed to be continued as per Rules. Head of Forest Force will take further action in this regard.

    c. 7 PMGSY Roads, for which the Forest Department has given Stop Memo shall be allowed unless there is violating of any Rule. Head of Forest Force will take further action in this regard.

    d. In respect of other road constructions stalled by the Forest Department, the Head of Forest Force will take follow up action and submit proposal to Government for taking further decision.

The meeting concluded by 12 noon.

APPENDIX II

GOVERNMENT OF KERALA

No. 1445/D2/2015/F&WLD

Forests & Wildlife (D) Department
Dated: 13.04.2015

The Principal Secretary to Government

Adv. Joice George , M.P
VP/10/175E, Idukki Colony P.O.,
Idukki, Kerala

Sri S Rajendran, M.L.A
Ikka Bhavan, Ikka Ngar, Munnar P.O.,
Idukki. PIN - 685612

Sri. Roshy Augustine, M.L.A
Cherunilathu chalil, Idukki Colony P.O.,
Vazhathope, Idukki. PIN-685 602

Sri. K.K Jayachandran, M.L.A
Kunnathu Veedu, Kunchithanni P.O.,
Idukki. PIN-685565

Sri. T.U Kuruvila M.L.A
Thombrayil House, Choladu P.O.,
Kothamangalam, Ernakulam. PIN - 686681

Dr.S.K.Khanduri
Inspector General of Forests,
Ministry of Environment, Forests and Climate Change,
Govt. of India.
A3-Tower 5, New Moti Bagh, New Delhi

Dr.B.S Corrie, IFS
The Principal Chief Conservator of Forests &Head of Forest Forces
Thiruvananthapuram

Sri. G Harikumar, IFS
The Principal Chief Conservator of Forests (Wildlife)
Thiruvananthapuram

Sri. G.J.Teggi, IFS
The Principal Chief Conservator of Forests (WP&R)
Thiruvananthapuram

APPENDIX II

Sri. O.P Kaler, IFS
Additional Principal Chief Conservator of Forests (BDC)
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Sri. Amit Mallick, IFS
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Sri. Sanjayan Kumar, IFS
Deputy Director
Periyar East Forest Division
Kumili, Thekkady P.O., Idukki

Shri. G.Padmanabhan
Emergency Analysis and OICDM Unit
United Nations Development Programme,
55, Lodhi Estate, New Delhi-110003

Smt. Gitika Goswamy
Technical Officer,
United Nations Development Programme,
55, Lodhi Estate, New Delhi-110003

Sir,

Sub:- Forest & Wild Life Department - Meeting on India Highrange Mountain Landscape Project scheduled to be held on 27/03/2015 - Minutes - Reg.

I am directed to forward herewith copy of the Minutes of the meeting held on 27.03.2015 for kind information ~~action~~.

Yours faithfully,
P. VIJAYACHANDRAN
Deputy Secretary
For Principal Secretary to Govt.

Approved for issue,5

Section Officer.

APPENDIX II

~~Draft~~

MINUTES OF THE MEETING CONVENED BY HON'BLE MINISTER FOR FORESTS AND WILDLIFE, GOVERNMENT OF KERALA ON INDIA HIGH RANGE LANDSCAPE (IHRL) PROJECT, MUNNAR HELD ON 27TH MARCH 2015

Present:

1. Adv. Joice George, MP, Idukki
2. Shri.T.U.Kurivila, MLA
3. Shri.K.K.Jayachandran, MLA, Udumpanchola
4. Shri.Roshy Augustine, MLA, Idukki
5. Shri.S.Rajendran, MLA, Devikulam
6. Dr.B.S.Corrie, Head of Forest Force, Kerala.
7. Shri.S.C.Joshi, Principal Chief Conservator of Forests (D & PFM)
8. Shri.G.Harikumar, Chief Wildlife Warden, Kerala
9. Shri.O.P.Kaler, Addl. Principal Chief Conservator of Forests (BDC)
10. Shri.G.J.Teggi, Principal Chief Conservator of Forests (WP & R)
11. Dr.S.K.Khanduri, IG (WL), Ministry of Environment & Forests & Climate Change.
12. Shri.Amit Mallick, Field Director (PT), Kottayam.
13. Shri.Sanjayankumar, Deputy Director, Periyar Tiger Reserve East, Thekkady.
14. Shri.Sudarsanan, Joint Director, ST Development Department.
15. Shri.G.Padmanabhan, Emergency Analysis and OIC DM Unit, UNDP, India
16. Shri.Gitika Goswami, Technical Officer, UNDP
17. Shri.P.Vijayachandran, Deputy Secretary, Forests & Wildlife Department.

The meeting commenced at 11.00 am with the Hon'ble Minister for Forests, Environment, Transport, Sports and Cinema in the chair. The Hon'ble Minister welcomed the participants and explained the very purpose of the meeting. He invited their views and suggestions about the India High Range Landscape Project (IHRL).

2. Adv. Joice George, MP and Shri.S.Rajendran, MLA, Devikulam expressed their displeasure on certain activities supposed to have been conducted in the Project area related to the project contrary to the decisions taken in the previous meeting held on 10.02.2015. The Chief Wildlife Warden clarified that no activity has happened in the High Range Landscape with the concurrence of the Forests & Wildlife Department related to this project consequent to the above decision. UNDP has

engaged a PR agency to create a positive image about the project but no work has been initiated so far.

3. The Hon'ble Minister intervened in the discussion and informed that nothing shall happen contrary to the decisions of the previous meeting and any activity related to IHRL Project should not be implemented without the consent of the Government.

4.Agreeing to the views of the people's representatives, the Forest Secretary also gave assurance in this regard.

5. Following the above, the Chief Wildlife Warden made a presentation of the Project. Principal Chief Conservator of Forests (WL) and Chief Wildlife Warden elaborated on the project objectives and strategy highlighting the landscape approach of management and land use plans. The role of project in securing and mainstreaming long term sustainability in the production sectors securing livelihoods was also highlighted in his presentation. Thereafter opened same for the discussions.

6 Adv.Joice George, MP raised certain issues about the project through a power point presentation. He argued that as per the project document, CHR appears as a Reserve Forest and that is against the policy of the Government. He alleged that this project is an effort to articulate the CHR area as part of Reserve Forest and to bring the same under the status of Buffer to the protected Areas in the landscape. He also mentioned that the project is drafted without adequate stakeholder consultation. He also mentioned that his perception is that some of the facts used for the project formulation are wrong. In addition, he also raised issues related to nomination of World Heritage Sites (WHS), Western Ghat Ecology Expert Panel (WGEEP) report, Udumbanchola Conservation Project etc. In response Inspector General, Ministry of Environment & Forests and Climate Change clarified that the buffer to WHS has no legal sanctity.

7 The Principal Secretary, F&WLD noted the effort made by the Hon'ble MP, Idukki in preparing his detailed presentation and requested to spare a copy along with the substantiating documents so as to examine the same and take appropriate decisions. He also requested the MP to put forth his conclusive suggestions for a fruitful outcome and taking further action on this.

APPENDIX II

6. In conclusion, the Hon'ble Minister stated that the Principal Secretary, Forests & Wildlife Department will examine the apprehensions raised by the Peoples' Representatives as well the pros and cons of the Project in detail and advise the Government on the subject. The Government will take appropriate decisions on this taking care of the interests of the people and farmers in the landscape. Final decision will be taken only after addressing concerns of the stakeholders for which one more meeting will be convened. Till then, the status quo shall be maintained.

The meeting concluded at 12.30 PM noon.

APPENDIX III

Joint Memorandum submitted on behalf of the Cardamom Planters and Spices Growers in Idukki District, Kerala by the registered Associations before

Sri.Oomman Chandy,Hon'ble Chief Minister

Respected Sir,

Sub : Request to stop the implementation of High Range Mountain Landscape Project framed by the Global Environment Facility (GEF) and UNDP with a focal objective to reduce the pressure from the Tea and Cardamom sectors.

We, the undersigned Registered Associations are the leading farmers associations representing the small, medium and large cardamom planters and spices growers in Idukki district, Kerala and working for the last several decades. We represent them in the conferences called by the Ministries, Government Departments, Trade Unions etc and in the policy making discussions directly affecting the cardamom and other spices planters/growers.

Sir, a project named **"India: Developing an Effective Multiple Use Management Framework for conserving Biodiversity in the Mountain Landscape of the High Ranges, Western Ghats"** with financial aid worth 67,50,000 USD from GEF, approved in December 2013and implementing by UNDP with co-partnership of the MoEF and Kerala Forest Department are now in implementing stage. The project (in short called HRML project) report has adverse remarks on Cardamom and Tea plantations. The project will adversely affect Lakhs of farmers who are holding one acre or lesser area, medium and large plantations. The project report limited the number of workers altogether in Tea and cardamom plantations into 93000. But in reality, more two lakh labors are working in the plantations in those sectors. The HRML project will be a direct hit to their employment. Either implementing agency or the co-partners never made a detailed discussion with the registered associations about the project before or after the approval of the project. On enquiry, we learned that no discussions were made with the MP, MLA's or the elected Panchayath Members, till date.

We are glad to inform you that we are doing eco friendly cultivations and we are the protectors of the environment. In fact, even by continues commercial cultivation of cardamom, tea and other spices for more than two centuries, the ecology in high ranges of Idukki is still remaining without much harm. This is a proof to our remarkable care in maintaining the environment. But we regret to point out that in the project narrated cardamom and tea cultivation as a threat to the nature. It demands to reduce the pressure from cardamom, tea and tourism sectors to restore the ecology. The report purposefully ignored the flow of Foreign Exchange to India obtaining through the export of Spices and Tea producing in the project area and also through tourism. The project report used nearly 21 paragraphs (82 to 102) to detail the threats, which we strongly oppose and write to note that most of those allegations are baseless or false.

Sir, we would like to point out that cardamom is mainly cultivating in Udumbanchola Taluk. The intensive cardamom cultivation zone is known as cardamom hills. Cardamom Hills are not an exclusive cardamom cultivation zone, but it is a major Black Pepper production area too. In cardamom Hills, cardamom is cultivating in about 40,000 Hectors and the remaining area were cultivated with Pepper, Ginger, Coffee, Tea, Paddy and other food and vegetable crops.

According to the project, the population density is only 282 person per sq.Km but the actual population density in most of the project area, especially in Udumbanchola Taluk is more than 400 persons per Sq.Km. This is almost equal to a fully Urbanized area. Even if the project area densely populated agriculture/ plantation area, the satellite pictures provide forest look which cause to make false decision about the highranges of Idukki district. Such defect was happened in Kasthuri Rangan Committee report also. This is emphasis the necessity of field verification before approving such projects.

We wish to point out that the **Government of Kerala has already filed affidavit before the Hon'ble Supreme Court stating that the Cardamom Hills are fully Revenue Land under the control of Revenue Department. Trees in Cardamom Hills are protected by the Forest Department, but the land was not notified as a Reserve Forest till date**. The said affidavit was filed by the State Government as defendant in the case filed by an NGO with fraudulent documents. Below signed two associations are also implied in the case as defendant. But in Paragraph 10 of the project given in Page 9 states that "Cardamom Hill Reserve (CHR) with an area of 865 Sq.Km was notified as a Reserve Forest in 1897 but has only a small portion under exclusive conservation regime (eg: Mathikettan)". This is a repetition of the fabricated fraudulent document filed before the Hon'ble Supreme Court and hence we suspect the influence of such ill motive NGO s on charting this project.

Following are the Focal Area Objective of the HRML Project:

1. Add 11600 Hectors (Ha) area into the Protected Area (PA) for improved management of the existing 8 Protected Area having an extent of 37100 Ha.
2. Accord elevated protection status leading to improved eco connectivity between PA's for at least 84600 Ha of High Value Biodiversity Areas (HVBA).
3. Direct reduction in pressure from the production sectors (Tea, Cardamom and Tourism).
4. Regeneration of forest fragments for the restoration of corridors.

It is to be noted that in Paragraph 44 and 45, the project report disclose the details of Protected Area(PA) and High Value Biodiversity Area(HBVA). But the project never disclosed the details of the proposed new PA. In the meantime, In Para 10, the report alleged that the Cardamom Hills are Notified Reserve Forest but only a small portion under exclusive conservation regime. So the target is clear.

Cardamom is a shade loving plant and that is why the cultivators are protecting trees. In the meantime, excess shade is also not suitable for cardamom and hence shade regulation is a part of the cultivation practice. Provisions given in the Cardamom Rules 1935 for making shade regulation itself shows the necessity of proper shade regulation. It is to be

noted that even if a part of the lower shade were regulated, the cardamom canopy cover the soil and its coverage is almost 100%. When other crops like Pepper, Ginger etc are converting to cardamom, farmers are always planting new tree plants for shade. As a result, within the last two decades, the total tree cover in Idukki district improved remarkably. Even the common people can identify these changes on physical verification. All these facts were ignored in the project and made allegation that the tree canopy cover reduced from 80-90% into 35-50% and thereby the ecology of the region were affected badly.

Sir, from the above facts, it is evident that the HRML project was prepared without proper consultation with the people living in the project area or with the Stake holders and without taking their declared consent. The Forest department claims that they have gathered approval from the stake holders in a workshop held at Munnar in 2013. But the said workshop never disclosed about the actual Focal Area Objective of the HRML Project. Launching of any type of project without proper consultation with the people and stake holders will not be accepted. By making a slight modification or through polishing, occurring damages could not be recovered fully. Because of the price fall, farmers are really struggling to maintain the crop and any type of forceful modifications in the cultivation methods may lead to massive suicide of farmers. Hence we humbly request you to take steps to abandon the HRML project which is launched without making proper consultation process with the stakeholders. In the meantime we assure you our extended co-operation for launching projects for protecting the environment if it disclosed the full details during the consultation process with the people and stake holders and implementing after collecting their declared consent.

Yours faithfully,

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