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the standoff between the stakeholder institutions

Clearly, there is considerable confusion about the roles, present status, and future of the KFCS initiative. On the one hand, the initiative is considered by some to have ended in 1971 with the creation of the new state of Himachal Pradesh and cessation of all grant-in-aid or payment of revenue, on the other many of the cooperatives are actually still functioning, notwithstanding the adverse situation. Viewed from a strictly legal perspective the cooperatives continue to have a de jure existence. The de facto position remains more complex as in some areas the cooperatives continue to manage areas originally under their management in collaboration with the Department of Forests while in other areas they do not play any active role in forest management. The roles played and the positions taken by each stakeholder institution are analysed below before attempting to look for solutions. A brief summary of the present position, commented by the author, is given in Box 3.

Role of the State Governments

Punjab Government (1937 to 1966)

As early as 1955, in independent India, the political apparatus had misgivings about the continuation of the KFCS in the given form. On July 1, 1955, the Chief Minister of the Punjab, Sh. Bhimsen Sachar, made the following observations.²³

1. The KFCS scheme in fifteen years of operation had spread to only 73 societies, covering 60,000 acres of a total 600,000 acres of land in Kangra District. This was very unsatisfactory progress and he thought probably resulted from the Rs 50,000 limit placed on grants-in-aid to KFCS.
2. Before agreeing to increase the outlay, the scheme should be thoroughly revised under the following principles.
 - a) The cooperative societies should be eliminated and management of these forests placed in the hands of the panchayats. The cooperatives were not sufficiently broad based as membership was confined to khewatdars, and even they were not fully represented. The principle that the profits of the natural resources of a village should go to a restricted group and not the body of the entire village (bartandars) was incorrect. Secondly, the distribution of profits as dividends to individuals is not correct. Thirdly, the government's avowed responsibility was to strengthen the development of panchayats, which now covered the entire territory and so should be utilised.

²³ Note dated 1.7.1955 from Sh. Bhim Sen Sachar, Chief Minister, Punjab, reproduced in Rawal (1968) Volume 2, pp. 125-26

- b) The scheme should be given up if it did not cover the entire forest territory. It amounted to unjustified preferential treatment by the government of those 73 villages with KFCS as they receive special monies as grants-in-aid while the remaining 513 did not.
- c) Reserved forests should be removed from the KFCS' purview as the focus of the KFCS scheme was only to improve the condition of the UPFs.

Based on these considerations and worried over the government's continued financial commitment to the programme, Sh. Sachar asked the FD to prepare a comprehensive scheme. No records are available that tell us whether this was done or whether a revised scheme covering all forest areas was proposed for the entire district. However, in 1955/56, the department abandoned two societies that had been formed in Hamirpur Tehsil and which were merely awaiting formal notification, and they never came into existence. The withdrawal of political will and support for KFCS seems to have developed from this point in 1955. It speaks of the FD's inability to convince the chief minister of the experiment's goals and aims and of its demonstrated strengths and achievements, and thus to win his political patronage and support for its continuance.

The government decided not to further expand the KFCS scheme without discussing or negotiating with the KFCS, which in the author's view demonstrates a lack of political vision and support within the Punjab Government. Despite this, the KFCS scheme continued and in 1961 the KFCS actually became more autonomous, receiving their revenue receipts back in place of the grant-in-aid.

Himachal and Himachal Pradesh Government (1967 to 1997)

When the Punjab was reorganised in 1966, Kangra District was merged into Himachal. Himachal Pradesh became a fully-fledged state of the Republic of India in January 1971. Two factors played against the future of the KFCS. The first was the lack of any knowledge and experience about an initiative such as the KFCS amongst the new state's political establishment. In some respects, the KFCS can be seen as a casualty of the bitter infighting between the 'old' and 'new' Himachal. Some people allege that the HP Government of the time, with strong representation from 'old Himachal', was not favourably oriented towards funding and supporting an initiative such as KFCS. Vested interests of local forest contractors in the considerable standing volume of timber in the KFCS forests are also thought by some to have played a role in reducing political support for the KFCS initiative.²⁴

The new state of HP inherited a unique institutionalised attempt at PFM from the Punjab, and had an excellent opportunity to look sensitively at people's management of forests, and to develop the approach as a sustainable and viable demonstration model for the hills as a whole. For whatever reasons, the FD decided instead to use its newly acquired control over the KFCS to strike a final blow at the initiative. Nevertheless various attempts were made to revive or take a fresh look at the societies over the next few years. In 1980 the forest minister appointed a committee²⁵ to give recommendations for renewing financial support to the KFCS. In 1981, the committee recommended that the KFCS be allowed to carry on their work as before. This issue came before the legislative assembly, and in a subsequent meeting, the forest minister approved the resumption of financial aid to the KFCS from 1982 onwards. Nothing came of these assertions, however. The HP Government notified²⁶ the formation of another committee in

²⁴ According to interviews with senior retired Cooperatives Department officials.

²⁵ Referred to in a report appearing in the newspaper Jansatta, dated 27.9.1996

²⁶ HP Govt. letter no. COP:F/S/-29/89 dated 6.10.1990

1990 to look into the rehabilitation of the KFCS, but the state legislative assembly was dissolved soon after and the committee could not fulfil its mandate. Then in 1993, acting on instructions from the registrar of cooperatives, the assistant registrar of cooperatives at Dharamsala selected five representatives from the KFCS for a state level committee for the revival of KFCS. However, these members have yet to be called for a formal meeting.

Role of the Forest Department

The role played by the FD in initiating and supporting the KFCS can be divided into four phases.

Phase 1: 1940/1 to 1954/5

The FD pioneered a very different and unique approach when it started the KFCS, a big departure from the very conservative system of forest conservancy usually applied at the time. Separate financial and technical allocations were made and strictly implemented through independent institutional structures set up to closely support the KFCS initiative. The concept approach was considered to have achieved its objectives, and it was recommended in early 1955 that it be extended to Hamirpur tehsil and in Nurpur tehsil.

Phase 2: 1955/6 to 1966/7

After 1955 the Punjab Government's support for the scheme dropped sharply, financial provisions for the initiative were reduced, and the FD stopped extending and expanding the concept to newer areas. This change became even more marked after Kangra was integrated into 'Himachal' following the Punjab reorganisation in 1966.

Phase 3: 1967/8 to 1972/3

The originally more or less autonomous functioning of the KFCS was further curtailed through the introduction of R. D. Rawal's centralised 'Integrated Working Plan', which was published in 1968 and remained in effect until 1985. By then, the fundamental basis of the KFCS initiative had already been undermined, and the FD had begun to lose interest in managing these forests through the cooperatives. In effect, the FD appropriated the right of management to itself, despite a clearly laid out autonomy and the power of each KFCS to approve its own management plan. In the opinion of the author, the FD was simply interested to regain control of and profit from forest land that had been successfully rehabilitated and regenerated through the hard work of the KFCS members.

In 1971 Kangra became a part of the state of Himachal Pradesh and the KFCS experiment moved to the new Himachal Pradesh FD. The KFCS scheme was initially not sanctioned beyond 1971, and for almost a year its very foundation was questioned. The HP government then gave in to pressure from the KFCS and superseded the FD, renotifying²⁷ the societies for another two years ending March 1973, on the same terms and conditions as before. Among others, this meant a resumption of the grant-in-aid to the KFCS for 1972 and 1973, but in fact

²⁷ Letter No. 4-55/70-SF dated 31/3/1973 from Forest Secretary to CCF, FD, HP. The same notification however increased the inspection fees payable by the KFCS as follows:
for first Rs 1,000 surplus income of the KFCS = 10 %
for the next Rs 4,000 = 12 %
for the next Rs 5,000 and above that = 15 %

these funds were not released to them until the 1980s. In 1973, using a legal loophole provided by the act of transfer of the district to HP, the FD refused to renotify the scheme. This completed the uncertainty about the KFCS' role and confusion over its legal status, as they were co-operatives they were still registered. The FD and the KFCS now held diametrically opposing views about their respective legal rights to manage the forest land under dispute. This is illustrated by the incident in KFCS Gahin Lagore (see Box 2).

Box 2: An Anecdote from Gahin Lagore Forest Cooperative Society

The old men in the village recounted this anecdote, their eyes dim but their memory clear, about the early days when the DFOs were kings of all they saw. The forest cooperatives had just been formed and had started working as people's organisations. I have no way of verifying the truth of this anecdote, but still feel that the story should be told.

A new DFO who had just joined Nurpur Forest Division came to Gahin Lagore and was met by one of his forest guards, whose daughter was to be married. The guard requested the sahib to grant him a dry tree to be used as fuelwood for the ceremonies. As was the fashion in those days, the DFO then and there sanctioned a tree. FD staff went to the nearby forest, which belonged to the Gahin Lagore Forest Cooperative Society, marked a suitable tree and chopped it down.

The KFCS president was appalled by this circumvention of all norms and took it as humiliation to the society, since its permission and concurrence was necessary before the DFO could take such action. He reached the site along with the society's forest officers, seized the implements from the FD staff and registered a damage report against the forest guard concerned.

This society's presumption angered the DFO, who felt that his powers were being challenged and he filed a complaint in the police station against the president, alleging harassment of forest staff intent on their duty. When the inquiry began, the question arose as to how these powers over forests, which were under absolute ownership of the DFO, could have been given to some people's 'society'. The managing committee explained, but being ignored, checked its own records for the notifications setting up and empowering the KFCS. Finding nothing, they asked the FD and the CD staff at Nurpur for copies, which were located. No photocopying machines existed at that time, so the documents were photographed with a camera and the prints produced as evidence in the police station.

The president and KFCS members requested all the sahibs who had come from Dharamsala to help them, but nothing came of it. The president felt cheated by the government's behaviour, on one side creating the society and legally giving it a role, and on the other not forcing its own departments to honour the concept. He went on to file a case against the DFO for defamation, but after the active intervention of the CD, he was ultimately convinced to drop it.

Things did not end there as the DFO in question later become Conservator of Forests for Kangra District. He was responsible for the WPs that were under preparation and included the role of the KFCS. He had never forgotten his humiliation when a mere 'society' had questioned a forest officer's acts. Holding such a crucial position, this conservator was instrumental in creating the FD's position that since the grant-in-aid was being paid to the KFCS to manage forest and shamlat lands which were now once again vested with the department (although technically they were not), the grant-in-aid need not be continued. From that point onwards, the FD used technical excuses to ensure that grant-in-aid was not available to the KFCS after 1973, and they were left to fend for themselves.



The high level of erosion in one part of KFCS Maranda Bhangiar's forest. For many years members have wanted to plant trees here but have been prevented by the fact that the forest department does not recognise them under the law.

Phase 4: 1973/74 to 2000/01

Nationalisation of NTFPs and the state's legal takeover of forest management, including the right to fell timber, led the FD to discontinue, without providing any reason, its old agreement with the khewatdars to give them their zamindari share of the revenue from timber felling. Thus within a few years, the KFCS, after successfully regenerating degraded forest land, lost not only the legal right to manage these lands and the technical advice and backup of the FD, but also their sources of income – grants-in-aid and their zamindari shares. Forests in this belt require a minimum 30 to 40 year cycle for the trees to reach harvestable maturity. The KFCS lost authority over their forests almost 30 years after they had first received the degraded lands, at a time when the decades of KFCS protection, plantation, and controlled extraction had rehabilitated these forests and brought them close to the peak of their capacity.

Despite the complex inter-institutional linkages and different types of support given to the KFCS, the main responsibility for the initiation, implementation, technical input, and facilitation of the KFCS lay with the FD. After 1973, the FD completely disregarded their existence and its responsibility towards these 70 institutions.

In the early eighties some DFOs entrusted a few societies (such as Bhagotla) with the responsibility of implementing the activities planned in Rawal's WP, essentially planting and protection of allotted areas. The KFCS were not involved in other forest divisions. Later the FD discarded the separate integrated working plan for KFCS, and included the individual KFCS forest areas in the respective plans of the territorial divisions, without seeking the opinions of the KFCS about this step. The reasons for the position taken by the FD are detailed in Box 3.

The KFCS have had difficulty reconciling themselves with the FD's loss of faith in their ability to manage and protect their forests, even though many continue to work on management

principles laid down and followed since 1942. In reality, the legal ambiguity and unclear demarcation of roles seems to be the real basis of the problem.

Role of the Cooperatives Department

The FD and the CD played different roles in supporting the KFCS, and there was often considerable confusion about who was responsible for what. As the KFCS were registered under the Cooperatives Act, final responsibility fell on the CD. Staff sensitive to the experiment provided administrative support (e.g., accounting and auditing of accounts) and organisational management inputs (monthly meetings of representatives of KFCS to discuss common problems and plan) through a special wing created at the inception of KFCS called the forest societies section. With the transfer of Kangra to Himachal Pradesh, these responsibilities were amalgamated and devolved to the new CD of HP, which neither created a special wing, nor deputed special staff to provide support to the KFCS. The responsibility for managing the month to month working of the KFCS, including accounts and audits, which had previously been handled by specially trained staff of the development branch of the Punjab CD, now fell to the overburdened staff of the general Cooperatives Department of HP. They were neither trained in the special accounting heads of the KFCS accounts nor oriented to getting support for these cooperatives from the FD. Although the CD continued to provide administrative support and facilitated some irregular meetings, the KFCS were essentially orphaned after 1971 (or even 1966) and the department seems not to have accepted any responsibility for continuing the scheme.

At the end, the CD found itself the parent department to a set of primary cooperatives that no longer had any legal assets (forests) from which to generate income. The institutions responsible, the FD and the state government, have remained insensitive to their pleas despite much correspondence exchanged over the last 23 years. Files in the office of the additional registrar, CD, Dharamsala, are full of letters to the CD headquarters at Shimla concerning the revival of the KFCS. Letters were also written to the conservator of forests in Dharamsala asking him to involve the KFCS in the implementation of the social forestry scheme, and later in the Van Lagao Rozi Kamao (VLRK) scheme. Despite their best efforts, and resolutions from the KFCS demonstrating their readiness to become involved in these schemes, the FD refused, arguing that the targets given for the Kangra Forest Circle were too small, and that these schemes for people's participation were to be carried out through community organisations other than KFCS as laid down in the schemes, although the guidelines for the social forestry and VLRK schemes betray no such narrowness. The CD continues to audit the KFCS accounts annually and since 1993 has been providing a management subsidy of Rs 1,200 per annum per society. The role of the CD is limited, however and the department has not succeeded in supporting the societies in their struggle.

Role of the KFCS

The KFCS were slowly stripped of the benefits of preserving their forest wealth, losing successively the zamindari share incomes, the shares of proceeds from resin and timber sales, and the grants-in-aid. Further the legitimacy of the societies, the root for effective community forest management, has diminished through confusion over their legal right to control their forests, and the FD taking over management of the forests and implementation of the working plans.

Although a few KFCS, such as Khalet, Tripal, and Gahin Lagore, possessed strong leadership, their attempts to oppose the status quo were mostly limited to letters, petitions, and resolutions

sent by individual KFCS to officials of the FD, the CD, and the political hierarchy. Until recently, KFCS members made few collective efforts, and there was no organised network of KFCS that could mobilise others to oppose the FD moves to isolate the KFCS from their forests. Long distances between the KFCS, the relative inaccessibility of the areas in which they lie, and the lack of institutional mechanisms to bring together the 70 odd societies to discuss common problems and plan their common future, prevented the KFCS from mounting an effective joint opposition to the new state's approach. The erosion of a feeling of ownership amongst the members, resulting from the loss of any direct benefit from the onerous task of protecting and maintaining the forests, also contributed to the inaction.

At present, the average KFCS member distrusts the existing KFCS status and feels that the forests managed by the KFCS were both far superior to those managed by the FD and infinitely more beneficial and responsive to people's needs. When asked whether panchayats should manage forests, people in KFCS areas say no. They make a clear distinction between the panchayats, which in practice are run by political parties and groups, and the KFCS, which they see as central to people's management because of their apolitical character. The internal dynamics of the KFCS is an interplay between different sections of a village's forest user groups and can be designed to ensure equity and sustainability.

Despite being scattered and limited, KFCS leadership did use the state's political apparatus effectively on two occasions. In KFCS Gahin Lagore, in the Nurpur forest range, the land survey for a link road went through the KFCS forest; it required the felling of 40 khair trees in UP 29. There was an imperative need for the link, so the KFCS felled the trees and took them under its control. When the KFCS wrote to the DFO to explain the situation and ask for his advice, he declared the move illegal, found the number of trees the rakha had recorded were fewer than those actually felled, and seized the wood and auctioned it – causing great resentment within the KFCS. The FD then publicly auctioned some mature khair trees; these were marked in the KFCS forest, but the field level FD staff had more trees felled than were marked. The KFCS closely monitored the felling and immediately complained to the HP forest minister and convinced him to visit the site. The minister saw both the stumps of the 40 illegally felled trees and the 50 khair sleepers that had been stored in the local school in collusion with the lower level FD staff. He ordered the DFO to suspend the range officer and FD staff concerned and called a review meeting at Dharamsala.²⁸

In the second case, the government's failure to pronounce any clear policy on KFCS prompted the leadership of a few societies to approach a local member of the legislative assembly (MLA) to have a question²⁹ raised in the assembly on the KFCS's status and the HP Ministry of Forests' plans for their future. The forest minister went on record to state that the HP Government had extended the scheme and paid grants-in-aid in 1972 and 1973, and not thereafter. He rejected the demand for unconditional release of grants-in-aid to all KFCS, saying that "the possibility could be considered for those KFCS that were working properly."

District forest cooperative societies union

In the early 1990s, the active leadership in the district decided that the lack of an organised platform for concerted action was an important factor limiting their efforts to effect change. A 'sangharsh samiti' (advocacy committee) was formed to lobby for the revival of the KFCS, but it was not very active and did not last long. Subsequently, the KFCS formed the Kangra District

²⁸ Reported in the daily newspaper, *Dainik Tribune*, 5/2/1996.

²⁹ Question No. 799, taken up and answered by the Forest Minister in the HP Legislative Assembly on 5/4/1994.3

Forest Cooperative Societies Union as a union of all KFCS; the Union was registered on 27 July 1996 (Registration No. 418) as a cooperative headquartered in the Ghurkari KFCS. In its first meeting after registration, the Union decided to seek the intervention of the High Court³⁰, and if need be, the Supreme Court of India, to stop the FD from taking over management of their forests. The KFCS maintain that the government failed to denotify the Kangra Forest Scheme, and the CD did not liquidate the KFCS. Other demands include reinstating the legal sources of KFCS income (hak chuharam, resin, grant-in-aid), as well as reviving their power to plan, implement, and protect their forests and supervise timber allocations, especially for ceremonial use at home (for cheiyi and other rituals), particularly important now that lack of wood has become a major problem. The KFCS accept the need to amend their by-laws to ensure that women and bartandars are more actively involved and they agree with basic joint forestry management principles. The union believes that community management through the KFCS concept will stop the degradation of the Himalayan forests; one aim is for KFCS to be expanded to all of Himachal Pradesh over the coming years.



Local MLA of the area, B.B.L. Butail planting trees in the KFCS forest during the van mahotsava, organised in 1999.

³⁰ The union has collected funds from all its members and hired the services of an experienced advocate in the High Court Shimla. At the time of writing, the petition has been filed.

Box 3: The Positions Taken by the Stakeholder Institutions

The various arguments are summarised and commented upon by the author.

The Position Taken by the Forest Department

The FD uses various contradictory arguments for having taken over the management of lands that were under the KFCS.

1. *The FD maintains that the lands given to KFCS were panchayat lands and since the HP Common Land Vesting and Utilisation Act of 1974 gave legal ownership of shamlat lands to the FD, it sees no reason for allowing KFCS to manage these lands nor to support the costs of their management in terms of grant-in-aid.*

In reality the KFCS were formed and given ownership of these lands in 1945 whereas the shamlat lands were given to the panchayats only in 1961. Besides, the proportion of the KFCS land that is shamlat is less than 1% of the total. Perhaps other factors are simultaneously acting on this state-people's interface over rights of access and use of forests. As a part of the Land Reform Acts between 1972 and 1974, the government transferred to the FD the ownership of all shamlat land, which by its own settlements had been vested with the khewatdars for more than a century. This seizure, done without any discussions or granting of compensation to the rightful owners, has further reinforced the idea that the state is non-participatory and self-seeking, leading to a situation of open access extraction and resulting in a typical 'tragedy of the commons' situation.

2. *The FD claimed that "the Govt. of HP was now the owner of all forest land (including KFCS managed lands) and the legal guardianship of all forest land was vested with the Forest Department³¹" and maintains that the amended Indian Forest Act of 1980 puts all categories of forest land in the different states under the ownership of the respective FDs, and thus that no cooperative can legally claim any right over such lands.*

This is partly the result of the application of the HP Revenue Act to the unique forest management initiative of KFCS, without consideration for the special order that created them when under Punjab State. This argument is further extended to say that the KFCS cannot claim any rights ('malkiti hakuks') arising out of ownership of forest/common lands, nor does the KFCS have any right to remove non timber forest products from the forest areas under their management. The FD refuses to acknowledge that it was itself responsible, as legalised through a government notification and a special order, for the creation and sustenance of the KFCS, and for handing over the said forests to them for management. Lacking clear guidelines from the government, the FD appears to be attempting to hide behind technical arguments.

3. *The FD claims that since the government extension of the KFCS scheme expired in March 1973, these societies are now illegal, working in an unauthorised manner, and getting revenue from the government forests by irregular means – and the FD has no reason to draw up WPs for them.³²*

The KFCS legally exist as cooperatives, as they were formed under the Punjab Cooperatives Act (II of 1912) and are presently governed under the HP Cooperative Societies Act of 1968. Even after 1973, most have continued electing their MC's every two years and having their accounts audited annually by the CD.

The same FD had drawn up WPs for the same areas to be managed under the KFCS up to 1983, refuting their own objection that the KFCS were functioning illegally after 1973. Such double standards demonstrate the FD's lack of a cohesive long-term PFM policy.

³¹ From Choudhary, CF Dharamsala, *Parawise Comments on the Report on 'Revival of Cooperative Forest Societies in District Kangra and Cho Reclamation and Soil Conservation Societies of Una District'*, by the HP Institute of Public Administration. (undated document, probably 1990)

³² Ibid.

4. *Giving a reason for its volte face, the FD asserts that “the present situation is totally different from that of 1935. At that time, undemarcated forests were in a deplorable state and the government was short of funds. These forests have now been planted; no more areas are available for planting and there is no dearth of funds.”*³³

This seems to imply that the creation of the KFCS and the support the FD extended was simply a device the FD used since it lacked the funds necessary to manage such badly degraded forest areas. Now that the forests have, by their own admission, been successfully rehabilitated, they feel compelled to take them back from the KFCS before the main benefits (timber) can be reaped. There can be no better admission of the state’s vested interests in forest resources than this and it suggests that the recent pronouncements on JFM and ‘people’s participation’ are not being made with the seriousness they deserve.

In 1989 a senior forestry professional went on record to say³⁴ that

“...since the government has not accorded sanction of continuation of the Societies from 31.3.1972 onwards, the forests given to the Societies are no longer under the control of the KFCS. The management of the forests has been taken over by the FD and henceforth, all activities connected with these forests (cognisance of forest offences, trees for bartan etc.) will be done by the DFO only, and under no circumstances by the Society.”

During the period 1973 to 1995, the FD seemed to assume that it legally controlled the forest areas that were under the KFCS. However, CF Dharamsala (district headquarters of Kangra) accepts that the management of these forests still legally resides with the KFCS. The present CF at Dharamsala believes that until recently, old colonial thinking prevailed in the FD, which opposed participatory forest management programmes in general, and KFCS in particular. He maintains that the present thinking in the department is to rehabilitate the KFCS and empower them once more to manage the forests. It does seem that the FD previously had a strong commercial interest in forests in terms of timber and the revenue generated, but after the period of rapid deforestation in HP from 1970 to 1985, when even the FD lost control over forests which were exploited to an unprecedented degree, the department priority is now conservation. This assertion, however, has yet to be reflected in a clear policy on PFM in general, and specifically with regard to the KFCS scheme.

The Position Taken by the Cooperatives Department

The views of the assistant registrar of the CD on KFCS can be gauged from the document “Parawise Comments for Revival of KFCS”, brought out by his office. The assistant registrar blames the improper functioning of the KFCS on the “lack of financial and technical assistance to the KFCS by both the FD and CD.” He feels that the policy of extension of the scheme by small, one to five-year increments was detrimental to a plan for the development of the forests, which is a long-term issue. He suggests a blanket extension for a thirty-year period.

The Assistant Registrar (AR) states that the KFCS that were financially weak “collapsed because of the non-payment of grant-in-aid since 1973.” He recommends that the pending grant-in-aid should be released immediately to the concerned KFCS so they can revive their forestry operations. He says that the FD must provide the management and the employees of the KFCS with technical guidance so they can undertake the improvement, protection and management of the forest lands. He also suggests that a special cell again be created within the CD to provide support to the KFCS, as was the practice in Punjab. The AR finds the lack of coordination between the FD and the CD to be one of the reasons the KFCS received no proper guidance. He recommends the formation of a district-level coordination committee, consisting of the DFOs, the deputy registrar, and the assistant registrars of the CD (the FD holding the chair). Thus far not much has come of these suggestions, as meetings and correspondence have continued to flow between the FD and the CD without any concrete results, the actual decision making power resting with the politicians. In addition, the CD itself has no clearly stated policy for its KFCS wards.

³³ Ibid.

³⁴ Vide his letter (No.F:9-45/3810, dated 12.6.1989) to all DFOs, and subsequently through Range Officers Jwalamukhi (15.7.1989), to all KFCS of Dehra Division.