



WILDLIFE FIRST

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26.7.2008

The Member Secretary
& Deputy Conservator of Forests
Wildlife Division, Mysore 570008

Sir

Sub: Suggestions on "Eco-tourism" Policy
Ref: Your letter No. DCF/WL/Eco-TOP/08-09 dt. 11.6.2008

Thank you for writing to us and seeking suggestions on formulation of a policy to regulate commercial wildlife tourism in and around PAs in Karnataka.

In response to your request referred at (2) above, Wildlife First is pleased to present its specific suggestions for the consideration of the Committee and Government.

We would be happy to provide any additional inputs or suggestions which may be necessary to strengthen the efforts to ensure that our fragile PAs are insulated from the escalating pressures of commercial wildlife tourism from both private and government controlled resorts.

Kindly keep us posted on the decisions of the Committee and share a copy of the recommendations to the Government.

Thanking you
Sincerely

Praveen Bhargav
Managing Trustee



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Suggestions on Wildlife Tourism Policy

Background:

The tourism sector in India is buzzing with new initiatives. While this is a welcome development, not all that is being said and labeled as “ecotourism” portends well for wildlife. Before analyzing why we need to tread with caution, it is important to understand some fundamental issues concerning wildlife tourism.

An insatiable thirst for land has already shrunk India’s forests alarmingly. Consequent to this, forest cover is down to just 19 per cent. Even within this landscape, just four percent constitute wildlife reserves which are tiny islands. These Protected Areas (PAs) are far too small to cater to the huge commercial wildlife tourism pressures.

Policy suggestions:

Wildlife First, has observed the growing pressures of ill planned tourism in and around PAs in Karnataka which are causing negative impacts. Listed below are key issues and policy suggestions that we wish to present:

1. Commercial Wildlife Tourism is today being wrongly classified as “ECO-TOURISM”. There is nothing ecological about most tourism projects that are presently operating around PAs including private and quasi-government entities. These can at best be called “ECO-NOMIC TOURISM”.

Policy suggestions: All commercial wildlife tourism projects must not be classified or called as “Eco-tourism”. A separate set of strict norms and evaluation parameters approved by an independent panel of ecologists and conservationists must be evolved for classifying genuine Eco-tourism projects.

2. It appears that the tourism department and tour operators are attempting to crash land an African wildlife tourism model of intensive vehicle borne wildlife safaris. This is a matter of serious concern. It must be stressed that the famous Serengeti-Masai Mara-Ngorongoro Reserves in Africa are spread over 30,000 sq km. In comparison our scattered Wildlife Reserves are miniscule areas of just 500-800 sq km with hard edges that abut villages and fragmented by highways, dams and mines. They do not have large buffer areas and migratory corridors for wildlife to range freely over several wildlife reserves.

Policy Suggestions: PAs in Karnataka, due to the reasons outlined above, require strict safeguards to deal with the growing trend of high end vehicle borne tourism. First, an objective impact assessment of commercial wildlife tourism must be conducted at all PAs with high visitation by an independent panel of qualified ecologists (not consultants or retired officials with links to high profile tour operators). Based on scientific assessments and recommendations of the panel, the number of resorts, visitors, vehicles and tourism zones and all other related aspects must be fixed and appropriate guidelines framed as per the existing guidelines of the National Tiger Conservation Authority (NTCA) FNo PS-DIR-PT/2003 dated 14th December, 2007 which includes phasing out all existing tourism infrastructure including fishing camps outside PAs.



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3. It must be recognized that luxury wildlife tourism creates resentment amongst local communities since they are stopped from entering reserves and even relocated outside while urban people in expensive vehicles are allowed to drive in and watch wildlife. Such a tourism model also has nothing to offer by way of a responsible revenue sharing mechanism with local communities or the PA. The present trend of merely employing a few locals as drivers and tour guides and organizing a 'traditional dance' by the camp fire is grossly inadequate to address this deeper social issue which has serious implications for long-term protection of PAs.

Policy Suggestions: We therefore suggest that the process of identifying appropriate buffer areas and notifying them as Ecologically Sensitive Areas (ESAs) in compliance with the 4.12.2006 Orders of the Supreme Court in WP 460/2004 must be completed in order to regulate commercial wildlife tourism in the immediate vicinity of PAs. This will reduce the potential for land use conflicts and minimize resentment among local communities.

4. Most agencies that promote commercial wildlife tourism are completely unaware of the negative ecological impact of unscientific manipulation of wildlife habitats to accommodate the hedonistic wildlife viewing demands of high-end tourists. Wide (20-30 metre) linear view lines have been cut in many areas which have been taken over by unpalatable weeds and exotic species like parthenium. High densities of chital in the view lines also cause over grazing of palatable grasses. Trees standing in such view lines also suffer considerable elephant damage. Further, innumerable forest roads have fragmented habitat and construction of water holes and salt licks at inappropriate locations are some of the other examples that affect wildlife habitats.

Policy Suggestions: We therefore suggest that the issue of managing wildlife habitat, particularly in the tourism zone must be done scientifically and not under pressure or local "understanding" between park managers and tour operators. All existing prescriptions for tourism zones in Management Plans must be referred for review to the panel of ecologists referred at (2) above.

5. Proposals to introduce elephant safaris are constantly mooted which can be disastrous. This will trigger the demand to create elephant camps in the forest interiors. New settlements will come up to house mahouts that gradually expand over time. Working elephants also carry diseases that may affect the wild populations. They overgraze forests around camps which degrade and open up forests. Elephants are also used to encircle and harass a carnivore feeding on a kill for a grand photo opportunity in some PAs in North India.

Policy Suggestions: We strongly suggest that there must be a clear policy not to encourage elephant safaris and further, all existing elephant camps must be moved out of PAs.

6. The forest department also has to deal with hordes of day visitors, particularly in Reserves that are along highways and popular tourism circuit routes. In response department is also trying to establish/upgrade facilities insider PAs. This would be violative of the provisions of the Wildlife (Protection) Amendment Act, 2002.



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Policy Suggestions: We suggest that such day visitation must be with prior bookings and regulated based on the approved number of tourists/vehicles that are allowed. An appropriate formula may be worked out for day and overnight visitors from resorts based on advance bookings. Furthermore, creation of visitor amenities like parking, rest and recreation areas must be outside the ESA and at a safe distance from PAs. However, research and education related visitation must be as per appropriate Guidelines.

7. There are other issues and proposals that have the potential of causing serious damage apart from violating the law. These include:

- i. The idea to handover 200 forest guesthouses to Jungle Lodges which will open up inaccessible areas to tourism and increase other pressures like roads and civil constructions.
- ii. Preposterous proposals to re-start sport hunting and introduce baiting.
- iii. Several resorts play loud music, organize gaudy events for the New Year with noisy fireworks. Some unscrupulous operators take tourists on "night safaris" with powerful search lights on public access highways and even inside where officials "co-operate".

Policy Suggestions: The guidelines to implement the policy must clearly prohibit the implementation of such tourism activities inside PAs.

We are aware that there is a proposal by Kudremukh Iron Ore Company Limited (KIOCL) to start luxury tourism operations inside the Kudremukh National Park at Malleswara in collaboration with Jungle Lodges. It is pertinent to note that even after three years of the landmark judgment of the Supreme Court, Kudremukh Iron Ore Company Limited (KIOCL) continues to be in illegal possession of over 5000 hectares of land within the limits of the Kudremukh National Park (KNP) in brazen violation of the Supreme Court Judgment, without dismantling its plant and machinery. Their proposal to start "eco-tourism" was rejected by the Supreme Court vide its Judgment dated 15.12.2006.

The company has ravaged the Kudremukh National Park for nearly thirty years. There is an urgent need to carry out massive ecological restoration of the area as per directions of the Supreme Court. In view of these facts the government must immediately evict them and recover the land in illegal possession of the company. Since the Supreme Court has already rejected their plea to start "eco-tourism" in Kudremukh, Jungle Lodges or any other entity tying up with the company would amount to a violation of the Apex court orders. The Wildlife (Protection) Amendment Act, 2002 also prohibits all kinds of tourism activity within the limits of a National Park.

We urge the Government to consider these policy suggestions including the legal position as outlined above and ensure that an appropriate wildlife tourism policy is framed. We would be happy to provide further inputs and suggestions to the Committee if required.