

08-May-2014

To,  
Dr. Vinod B. Mathur,  
Director - Wildlife Institute of India.

Dear Sir,

**Sub: Comment on the draft guidelines for wildlife research in India, 2014**

We, a group of ecologists and wildlife biologists working throughout the country, are writing in response to the guidelines drafted following a meeting held in Wildlife Institute of India on the 3<sup>rd</sup> of April, 2014 for conducting wildlife research in India. The guidelines are a laudable attempt to improve and formalize the process by which research permits are granted. However, we bring to your notice several issues that need further clarity and discussion:

1. The definition of research in the guidelines needs to be expanded. We propose the **inclusion of a category of 'Environmental and Social Research'**, which encompasses geology, hydrology, anthropology, sociology and other allied sciences.
2. The **scope of these guidelines needs to be defined unambiguously, such that it only encompasses research within Protected Areas (PAs)**. Phrases such as "PAs and beyond" and "PAs and other field sites" need to be replaced with "PAs".
3. While we appreciate the need for research that is applicable to management, we emphasize that there should be **no delay in processing permit applications or no denial of permits if proposed research is seen as not relevant to management objectives**.
4. We suggest that the **Research Advisory Committee only be employed for making recommendations on invasive research** to enable the Chief Wildlife Warden to grant permits within the stipulated time period (30 days for short projects).
5. We request that the **time frame provided within these guidelines for the processing of permits be made binding on the Forest Department**.
6. We strongly suggest that the **criteria for eligibility include individual scientists**, in addition to the currently mentioned non-governmental organizations and academic institutions.
7. We emphasize that the **Grievance Redressal Committee be an authority independent of persons who participate in the research permit granting process**. We also suggest that the **recommendations of this committee be binding on the Forest Department**.
8. The **decision to partner/collaborate with the Forest Department should not be a mandatory directive, but instead be the prerogative of the researcher or the research organization**. We emphasize that **research methodology should be developed by project investigators, given their expertise in the subject**.

We request that future revisions of these guidelines involve more members of the research community. We emphasize that the urgent need for encouraging research in India are not met by these guidelines. To make wildlife research in India comparable to global standards and facilitate informed management of wildlife and habitats by the Forest Department, we strongly recommend that the modifications suggested above be incorporated into future versions of the guidelines.

Thanking you.  
Yours' sincerely,



Tarun Nair  
(Authorised Signatory / Trustee)

**Researchers for Wildlife Conservation**

**Encl: Comment on the draft guidelines for wildlife research in India, 2014**

## **Comment on the Draft Guidelines for Wildlife Research in India, 2014**

The recently proposed guidelines for research emphasize the necessity for a greater understanding of wildlife and ecosystems and the incorporation of this understanding into wildlife conservation and management. It further highlights the urgent need to improve and formalize the process and contexts in which research permits are granted. We agree that these reforms can potentially provide greater procedural clarity to the application process for research permits, improve the working climate for researchers in Protected Areas (PAs), and promote meaningful relationships between scientists and the Forest Department. **However, there are important issues that arise from the proposed guidelines, which we raise in this document.** As a group of ecologists and conservation biologists involved in research and conservation projects throughout India, we have concerns regarding the content these guidelines, as well as the process by which the guidelines were framed.

### **1. Definition of wildlife research: going beyond ‘wildlife research’ (Points 2 and 4 of the Guidelines)**

Providing guidelines for research within Protected Areas needs to look beyond wildlife as the primary focus of research. The Wildlife (Protection) Act (WPA) is “an act to provide for the protection of [Wild animals, birds and plants] and for matters connected therewith or ancillary or incidental thereto” (Anonymous 1972). In so being, the Act encompasses within its ambit other types of research within Protected Areas. We point out that hydrological research within Kudremukh National Park, Western Ghats, clarified the intensity of the impact of iron ore mining in the region (Krishnaswamy et al. 2006) and aided in the formulation of conservation policy with respect to mining within the National Park (Dattatri 2005) and elsewhere (Gandhi 2014). Similarly anthropological and interdisciplinary research within PAs may be required to fully understand the ecological and social dimensions of conservation, and evaluate conservation initiatives. We therefore suggest including, within the definition of ‘research’, an additional category termed ‘Environmental and Social Research’, which encompasses any research within PA on the habitat, environment and matters connected therewith.

### **2. Prioritization of research proposals (Points 4 and 5 of the Guidelines)**

We are concerned about the philosophy of prioritizing certain kinds of research for giving permits, especially those with a management focus, and that the Forest Department still has the veto power to decide what research is deemed “necessary” or “appropriate”. While management-oriented research is undoubtedly important, there is no justifiable basis to prioritize it over knowledge that may provide benefits only in the long term. If a research project is not harming any wildlife or habitats, we submit that arbitrary assignment of worth to a scientist’s research amounts to an infringement of a citizen’s right to practice their profession. Unless there is established and sound evidence of a certain research activity being detrimental to wildlife or its habitat, no research should be delayed, dismissed or denied permits. Further, unless funding for the research is coming from the Forest Department, it is unreasonable for a department charged with management to have a say in determining priority, validity, or legitimacy of scientific research. We submit that the idea of “priority” in assessing a research project is not a healthy framework to work within. It should be acknowledged and understood that PA are spaces within which wildlife scientists conduct their research, and as citizens of a democratic country, they should be able to pursue their independent lines of scientific inquiry and curiosity in their careers. We emphasize that no delay or denial of permits should emanate from the objectives of a given research proposal.

**3. Clearly defining the scope of application of these guidelines (Point 2 of the Guidelines)**

The scope of the current guidelines is unclear. By using the WPA definition of wildlife, even a study on the in-situ behavior of rhesus macaques in residential areas would need to go through the processes delineated within the said guidelines. The ambiguity of this scope is emphasized by phrases such as “managers of PAs and other field sites” and “PAs and beyond” in point number 5.7. We strongly recommend that the ambit and scope of these guidelines be restricted to research within PAs, with the exception of invasive research involving the capture and handling of animals listed in Schedule I–IV of the WPA.

**4. Research Advisory Committee (RAC; Point 5.3 of the Guidelines)**

It is untenable for every project to have to go through an additional bureaucratic hurdle of an evaluation by the Research Advisory Committee. This will slow down the permit process considerably, and is a serious concern for researchers undertaking time-bound thesis projects, short-term projects, research that must be performed within a given window, and abiding by deadlines and requirements of grants and donor agencies. It is unreasonable for the Chief Wildlife Warden as well as other members of such a committee to meet at intervals that are regular enough to evaluate and dispose all proposals. As a result, permits are likely to be inordinately delayed, a situation that will be problematic for researchers and the Forest Department alike.

We believe that it is unnecessary to have committees for regular administrative matters such as granting permits. We instead suggest that every proposal be dealt with on a case-by-case basis, within the time frame prescribed in the WPA and these guidelines, as and when the application is submitted. Only projects involving handling of animals should have to go through the Research Advisory Committee.

**5. Time frame for projects (Point 5.3 of the Guidelines)**

The guidelines only “recommend” granting of permits for short-term projects within 30 days. This is vague, open to interpretation, and not binding on the Forest Department. We strongly recommend that this be made binding on the Forest Department. In keeping with this, we suggest that the phrase “it is recommended” under point 5.3 of the Guidelines be changed to “we stipulate”. Further, 120 days is an unduly long frame for granting permits. We submit that this be reduced to 30 days for short term ( $\leq 1$  year), and 60 days for long-term projects. It must be recognized that projects are usually time bound with strict reporting periods to granting agencies, and unnecessary delays severely compromise a researcher’s commitments, opportunities and credentials in the scientific community.

**6. Modification of projects (Point 5.4 of the Guidelines)**

As currently stated, researchers are bound to modify their proposal based on the recommendations of the Forest Department. Researchers must be granted an opportunity to justify existing proposals, rather than being forced to make modifications, as is the internally-followed process of peer review. Further, resubmitted proposals should be evaluated within a time frame of 15 days, or half the original stipulated time frame for granting permits, to avoid unreasonable waiting times for projects.

## 7. **Criteria for eligibility (Point 6 of the Guidelines)**

We suggest including independent scientists as eligible parties for the conduct of research in addition to academic and research institutions and non-governmental organizations, as currently stated in the guidelines.

## 8. **Grievance Redressal Committee (GRC; Point 9 in Guidelines)**

We emphasize that the GRC should be an independent committee for fair and objective redressal of grievances. As formulated, there is a conflict of interest in having the Chief Wildlife Warden and other members of the Forest Department in the GRC, as these members are likely to be an involved party in the grievances. We propose that the GRC have a 50-50 representation of independent biologists / scientists (with adequate representation of non-governmental research bodies) along with FD members, with no veto power for forest officials. We also propose that the GRC be comprised of scientists and managers from outside of the state within which the grievance is committed. Further, as with above, we ask that grievances be addressed within 30 days.

## 9. **Code of practice for wildlife research in India (Annexure III of the Guidelines)**

**Point 4:** The use of the word “should” can be misconstrued and misinterpreted in the granting of research permits, to only allow individuals and organizations that agree to collaborate with the Forest Department to conduct research. We suggest that the phrase “managers ... should seek to partner”, and “researchers should seek collaborative relationships” to “managers ... may seek to partner” and “researchers may seek collaborative relationships”, respectively. We also note here that this code of conduct and others therein confuse the role of Forest Department personnel as managers with their role as researchers. When dealing with external research permit applications, the Forest Department must prioritize their managerial responsibility of providing the required permits. Discussions on collaborative research can be initiated as a follow-up process independently.

**Point 7 and 11:** The decision to partner/collaborate with the Forest Department should not be a mandatory directive, but instead be the prerogative of the researcher or the research organization. Additionally, we emphasize that research methodologies should be designed by experts in the field. As the issue of collaborations between managers and scientists have been dealt with in Point 4, Annexure III of the Guidelines, we suggest that these two points be deleted.

**Points 8 & 15:** Authorship on peer-reviewed scientific publications should be based on objective international conventions of intellectual or field-based contribution and involvement during multiple stages of the project. We emphasize that this point should not be a binding factor, and further, should not be a deciding or influencing factor at the stage of granting research permits.

**Point 13:** We agree that researchers or for that matter anybody (e.g. tourists) should not provide any information that is harmful to the species or the area, such as specific locations of rare species, which might lead to their collection. However, this should not imply that researchers not do anything that is “sensitive to PA management” or highlight potentially negative impacts of management practices. In fact it is everyone's democratic right and duty to expose or raise concerns about questionable management practices and inefficient managers. We therefore suggest that the phrase “sensitive to management” be replaced with the phrase “demonstrably detrimental to the viability of species or ecosystems”.

## 10. Process of future formulation of guidelines

Overall, we appreciate the spirit and the attempt to engender much needed reform in the process of granting research permits and in allowing the development of research in multiple fields within PAs. However, we would like to express our concern and misgivings about the process by which these guidelines were drafted. There was inadequate representation of independent researchers and non-governmental organizations, in spite of the fact that a large fraction of wildlife and conservation research in India is conducted by this section of the population. **We question why more members from amongst the wildlife research community were not part of this decision making process especially given that the opening statements talk about the importance of diversity in research. This diversity can be truly and democratically practiced only when all relevant stakeholders have a voice in the decision-making process that affects them so tangibly and seriously.** We therefore strongly emphasize the need to engage with and involve independent researchers in future discussions and drafting of the said guidelines.

As mentioned in the Guidelines, today more than ever, there is a greater need for understanding the natural world from multiple perspectives and disciplines, and develop healthy cross-sectoral relationships. However, these goals will be compromised by vague wordings and indistinct or unreasonable requirements in the guidelines, that may be open to misuse and misinterpretation. There has been no mechanism put forward to bridge the asymmetric power dynamic between forest officials and researchers. The guidelines should be reframed to democratically accommodate and reflect the concerns of a wider body of researchers working across a diversity of landscapes and issues in India. We hope that this document will serve to guide this process, and strongly recommend that the points mentioned within this document be incorporated into future versions of the Guidelines.

### Literature cited

Anonymous. (1972). The Indian Wildlife (Protection) Act. Government of India.

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