



POLICY BRIEF

Robust Gram Sabha Sustainable Forests Secure Livelihoods

**Catalysing CFR management plans
to protect, regenerate, conserve
and manage forests**

June 2026

A civil society initiative

On December 19, 2025, the Ministry of Tribal Affairs, Government of India organised a **National Consultative Workshop on FRA 2006** in New Delhi that included more than 20 researchers and civil society organisations to discuss key challenges in the implementation of the FRA. Building on this dialogue and seeking to contribute constructively to the effective implementation of the Act, many of the participants came together to identify priority issues and develop practical recommendations to move closer to the FRA's promise and potential.

This policy brief is the first in a planned series addressing specific themes and proposing actionable pathways for reform.

Authors:

Sharachchandra Lele, **Gautam Aredath** (Ashoka Trust for Research in Ecology and the Environment); **Milind Thatte** (Tribal Ethos and Economics Research Foundation); **Geetanjay Sahu** (Tata Institute of Social Sciences)

Contributors (alphabetically):

Anubhav Shori, Chhattisgarh Vanadhikar Manch; **Avinash Mattur**, Shivganga Samagra Gramvikas Parishad; **Brajesh Dubey**, Bharat Rural Livelihoods Foundation; **Dharamchand Khair**, Rajasthan Adivasi Adhikar Manch; **Girija Devi**, Centre for People's Forestry; **Johnson Topno**, Partnering Hope into Action Foundation; **Keshav Gurmule**, SRISHTI; **Namita Mishra**, Foundation for Ecological Security; **Samar Bosu Mullick**, Institute of Community Forest Governance; **Sandeep Minhas**, People for Himalayan Development; **Santanu Chakraborty**, Society for DISHA; **Trupti Mehta**, ARCH Vahini; **Tushar Dash**, Vasundhara

Correspondence: Sharachchandra Lele, ATREE (slele@atree.org)

Design: Gautam Aredath



"It is the priority of our government to ensure that tribals get their right. No one has right to snatch away their lands."

Hon'ble Prime Minister Shri Narendra Modi
National Tribal Conclave, New Delhi
25 October, 2016

ABBREVIATIONS

CA: Compensatory afforestation

CFR: Community forest resource

CFRMC: Community forest resource management committee

CFRMP: Community forest resource management plan

CFRR: Community forest resource rights

DA-JGUA: Dharti Aaba Janjatiya Gram Utkarsh Abhiyan

DC: District Collector or Deputy Commissioner

DFO: Divisional Forest Officer

DLC: District Level Committee under the FRA

DLMC: District Level Monitoring Committee under the FRA

JFM: Joint Forest Management

FD: Forest Department

FDC: Forest Development Corporation

FRA: The Scheduled Tribes and Other Traditional Forest Dwellers
(Recognition of Forest Rights) Act, 2006

MoTA: Ministry of Tribal Affairs, Government of India

NFP: National Forest Policy

NREGA: Mahatma Gandhi National Rural Employment Guarantee Act, 2005

NWPC: National Working Plan Code (of 2023, unless mentioned)

VSSA: Van (Sanrakshan evam Samvardhan) Adhiniyam, 1980

WP: Working Plan

MoTA must clarify legal ambiguities, stop violations and enable resources to support CFR management

The Forest Rights Act, 2006 vests primary authority over forest management in CFR areas in the Gram Sabha.

Gram Sabhas are required to prepare and implement Community Forest Resource Management Plans (CFRMP), and Working Plans of the Forest Department need to be modified to integrate the CFRMPs.

Yet Gram Sabhas face significant challenges in operationalising these requirements.

Forest Departments try to dismiss CFRMPs because they differ from their own Working Plans. This is natural because the two have different scales and objectives. Instead, FDs continue to enforce Working Plans over Gram Sabha objections, even seeking to restrict rights in order to continue their felling and planting operations.

Failure to support and strengthen Gram Sabha-based forest management has negative consequences for both forest dwellers and forests.

To resolve this situation and to strengthen Gram Sabha-based forest management, MoTA must issue binding guidelines under Section 12 of the FRA:

- to assert precedence of CFRMPs over Working Plans,
- to stop Working Plan operations in CFR areas, and
- to build Gram Sabhas' capability to make and implement their own management plans

Gram Sabhas' powers under the FRA undermined by parallel legal and administrative mechanisms

Gram Sabha – the general body of the village, consisting of all adult members, with full participation of women – is the institution at the centre of the FRA's framework. It is a democratic and deliberative forum for local communities to discuss, debate, decide and act to protect forests, watersheds and ecologically important areas, wildlife and biodiversity, and the cultural and natural heritage of forest dwellers.

Forest dwelling Scheduled Tribes and other traditional forest dwellers are integral to the very survival and sustainability of the forest ecosystem.

Preamble of the FRA

Yet the primacy of the Gram Sabha in the protection and management of community forest resources is repeatedly contradicted and curtailed by older legal and administrative mechanisms, that continue to follow a centralised and top-down form of forest governance.

Nearly twenty years after the passage of this landmark law, the transformation of Gram Sabhas into effective units of self-governance and prosperity remains unfulfilled.

This brief focuses on the management of CFR areas by Gram Sabhas through CFRMPs, and their interface with the Forest Department's Working Plans.

GRAM SABHA'S KEY POWERS



Rights recognition

SECTION 6(1)

- Determine the nature and extent of individual and community forest rights
- Recommend rights for final approval of the DLC



Forest management

SECTION 5(a-d), RULE 4(1)(f-g)

- Protect forests, wildlife, biodiversity and ecologically sensitive areas
- Protect cultural and natural heritage from destructive practices
- Prepare and implement management plans
- Regulate access to forest resources and issue transit permits



Statutory role

SECTIONS 4(2), 7, 8

- Approve any curtailment of rights or resettlement in Critical Wildlife Habitats
- Initiate criminal proceedings against FRA violations

CFR management plans of Gram Sabhas are undermined by Forest Department Working Plans

NON-COMPLIANCE

Working Plans enforced in CFR areas over Gram Sabha objection

FDs continue to impose timber felling and plantation activities in CFR areas, even where Gram Sabhas have objected. This curtails Gram Sabhas' ability to manage their CFR areas for multiple needs, such as NTFPs, grazing, cultural beliefs, and local conservation.

Often the FDs' rationale is: "since felling is under a centrally-approved Working Plan, it must continue."

NON-COMPLIANCE

Non-recognition and cancellation of rights in timber felling areas

In some CFR areas where forest lands have been assigned to Forest Development Corporations, FDs have attempted to restrict rights recognition or even to cancel recognised titles.

This is done so as to not disturb the commercial timber felling activities of the FDCs.

ERROR

Confusion about what 'integration' with Working Plans means

Rule 4(1) (f) requires Working Plans to be modified to integrate CFRMPs, but the meaning of "integration" is unclear. MoTA's 2015 Circular clarified that Gram Sabha and the CFRMC shall be the authority to modify the Working Plan as per the CFRMP. But MoTA's 2023 Guidelines introduced ambiguity by asking CFRMC to "coordinate with Forest Department for integration."

The 2023 Guidelines or the NWPC do not provide any procedure for revising Working Plans to incorporate CFRMPs, and hence this requirement has been effectively stalled.

TIMELINE

- Early 19th century**
British administration introduced WPs to maximise timber yield from Indian forests
- Post-independence**
NFP 1952 continued the emphasis on 'sustained supply of wood for industry'
- 1988**
New NFP banned clear felling, but primary focus of WPs continued to be timber
- 1998**
Supreme Court mandated WPs before any felling. WPs to be approved by the central government (AIR 1998 SC 769)
- 2004**
NWPC published, which contains the same basic ideas about sustainable timber yield, and lacks guidance for other forest management goals (NWPC revised in 2014 & 2023)
- 2006**
FRA enacted: Gram Sabha vested with CFR management authority under Section 3(1)(i) and Section 5
- 2012**
FR Rules amended: CFRMP to be integrated with WP with "modifications as may be considered necessary by the CFRMC"

A different, but still problematic, approach is visible in parts of Maharashtra (e.g., Ekal project in Gadchiroli district) where the administration is facilitating the preparation of CFRMPs in a hurry with limited attention to forest management. Instead, their primary focus is on execution of works under the NREGA.

2015

MoTA Circular (23.4.2015)

2017

Maharashtra government issued optional format for a simple CFRMP (6.7.2017)

2023

- MoTA Guidelines for CFR Management (12.9.2023)
- VSSA Rules prescribed procedures for WP approval, but did not bring alignment with FRA

2024

- MoTA-MoEFCC Joint Advisory on FRA (14.3.2024)
- DA-JGUA Operational Guidelines provides indicative format for CFRMPs

2025

- Chhattisgarh FD issues letter restricting CFR management until 'model CFRMPs' are prepared (letter was revoked)
- Chhattisgarh FD officially requests cancellation of CFR titles in forest lands used by FDC (30.6.2025)

ERROR

CFRMPs dismissed as 'non-scientific'; NWPC imposed

Forest officials routinely reject CFRMPs as non-scientific or insist they conform to NWPC standards – despite the NWPC being primarily procedural. The 2024 Joint Advisory of MoEFCC and MoTA supports this erroneous position because it suggests that Gram Sabhas ought to take the help of forest officials in preparing CFRMPs and contemplates the creation of "model CFRMPs" in consonance with the NWPC.

The NWPC does not contain any guidance for local scale, multi-purpose forest management. Moreover, requiring central government clearance for a plan that does not involve tree felling would be unnecessary and violative of the FRA's intent of locally developed plans, thereby delegitimising traditional knowledge and disempowering Gram Sabhas.

GAP

CFR areas have no distinct legal category in forest records

Recognised CFR areas under Section 3(1) (i) of the FRA are not recorded as a distinct category in forest records or revenue records. This administrative invisibility means Forest Departments treat CFR areas as ordinary Reserve Forest or Protected Forest, creating and applying Working Plans and conducting other activities in a manner oblivious to CFR rights.

Gram Sabhas have the right and authority to manage CFR areas through simple, locally developed CFRMPs

Primacy of CFRMP

The FRA vests primary authority over the management of forests in CFR areas in the Gram Sabha, and asks that forest management on such lands must be in conformity with the CFRMP prepared by the Gram Sabha. CFRMPs must meet the criteria of 'sustainable use', 'conservation', and 'equitable use' that are stipulated in various provisions of the Act and the Rules.

Simple, locally comprehensible

There is no requirement under the FRA or Rules for the CFRMP to follow any particular format. MoTA's 2015 Circular affirmed that each Gram Sabha is free to develop its own simple, locally understandable CFR conservation and management plan, but MoTA's 2023 Guidelines is silent on this point.

Working Plan no longer applies

If the Gram Sabhas have the right to manage their CFR areas based on locally developed CFRMPs, then FDs cannot continue to impose requirements of WPs in such areas. The WPs need to be modified based on CFRMPs for which a process must be prescribed.

No clarity about CFR areas in NWPC or VSS Rules

In 1998, the Supreme Court mandated WPs for all forest divisions and suspended timber felling in the absence of WPs. Rule 12, VSS Rules, 2023 governs preparation and approval of WPs in accordance with the NWPC. NWPC requires documentation of forest rights, but does not clarify whether and how WPs should cover CFR areas.

The Gram Sabha shall monitor the [CFRMC] which shall **prepare a conservation and management plan** for community forest resources in order to sustainably and equitably manage such community forest resources for the benefit of [forest dwellers] and **integrate such conservation and management plan** with the micro plans or working plans or management plans of the forest department with such modifications as may be considered necessary by the [CFRMC].

Rule 4(1)(f), FR Rules 2008 as amended in 2012

MoTA should issue binding guidelines to clarify how CFRMPs are to be finalised and the applicability of Working Plans

1. Clarify precedence and integration as follows:

- | | | |
|---|--|---|
| a | CFRMP supersedes the WP within CFR areas. Upon creation of a CFRMP in accordance with Rule 4(1)(f), the WP shall cease to apply to those CFR areas, and shall stand modified to that extent. If the WP applicable to any CFR area has already expired, no new WP shall be prepared for the area. | Precedence
of CFRMP |
| | NWPC shall not apply to CFR areas. | |
| b | <p>Pursuant to Rules 4(3) and 16, the CFRMPs created in accordance with Rule 4(1)(f) shall be dealt with in the following manner:</p> <ol style="list-style-type: none"> 1. CFRMC shall share the CFRMP with the District Level Monitoring Committee, 2. The District Collector shall facilitate the sharing of comments by all departments represented in the DLMC on the CFRMP with the Gram Sabha, within a period of 30 days, 3. The Gram Sabha shall consider all such comments at a meeting specially convened for this purpose, and shall have the authority to accept or reject such comments, and 4. The final CFRMP, as approved by the Gram Sabha, shall be shared with the DLMC. | Procedure to
finalise
CFRMP |
| c | Since the FRA does not explicitly allow Gram Sabhas to propose or undertake tree felling, CFRMPs shall not be subject to the procedural and approval requirements under the Rule 12 of the VSS Rules. | No additional
approval
required |
| d | CFR areas under Section 3(1)(i) shall be recorded as a distinct category – 'CFR' – in all forest and revenue records of state governments and Forest Departments. | Recording of
CFR areas |
| e | The state government shall mandatorily obtain the prior consent of all concerned Gram Sabhas (irrespective of whether forest rights are recognised or pending) before proposing to use any existing forest land for CA. If consent is given for using CFR areas for CA, any activities undertaken shall be in accordance with the CFRMP, without abridging any recognised use rights, and with Gram Sabha as the implementing agency. | Prior
consent for
compensatory
afforestation |

2. Harmonise Working Plans and CFRMPs as follows:

- | | | |
|---|---|---|
| a | All felling operations and/or plantation activities (including CA) under any WP (or any other plan or scheme) shall be stopped (or not be permitted, as the case may be) in any lands (i) where forest rights of one or more Gram Sabhas have been recognised, and (ii) in relation to which any Gram Sabha has submitted a claim for the recognition of forest rights and has passed a resolution to stop felling and/or plantation activities, using its powers under Section 5 of the FRA. | Cessation of
timber
felling |
| b | If, however, the recognised CFR area is managed as a monoculture plantation for timber operations (including in areas leased to FDC), Gram Sabha may request the state government through the DLMC for interim arrangements that continue tree felling while transitioning to multi-use forestry within the WP period. In such cases, the WP shall be revised on terms acceptable to the Gram Sabha, including for revenue sharing (which shall not be less beneficial than the existing orders under JFM), and written consent of Gram Sabha shall be obtained. For clarity, non-statutory committees shall continue to be superseded by CFRMCs as per MoTA's 2023 Guidelines. | Interim and
transitional
arrangements
in plantation
sites |

3. Support CFRMP preparation and implementation as follows:

- | | | |
|---|---|--|
| a | Gram Sabhas shall be free to develop their own simple format for the CFRMP which its members can understand with ease. It may comprise the rules and regulations governing forest access and use, and activities to be taken up for conservation and regeneration. Financial support must be extended by the state tribal departments to Gram Sabhas for the preparation of CFRMP. | Ease of
CFRM
planning |
| b | Funds available to the FD for forest management, afforestation, improvement, restoration, etc. at the district/forest division level shall be divided between the FD and each CFR-titled Gram Sabha on a pro-rata basis based on the forest area that is managed by each entity. DLMC shall ensure that such amounts are transferred to the Gram Sabha in advance of the proposed utilisation period. Any conditions relating to usage of the funds, such as utilisation certificates or audits, must be informed in advance, and necessary training and/or support must be provided. | Sharing of
forestry
funds |
| c | All non-felling improvement operations, such as plantation, soil conservation, assisted natural regeneration, etc., will be only as prescribed in the CFRMP and with the Gram Sabha as the implementing agency. The DLMC shall provide necessary resources and assistance to the Gram Sabha towards such operations and initiatives. The DLMC will also ensure that the FD provides forest protection support to Gram Sabha upon demand. | Converging
resources
and support |



Catalysing CFR management plans to protect, regenerate, conserve and manage forests

Policy Brief, June 2026

