

**INSPECTION REPORT OF THE CENTRAL
TEAM CONSTITUTED TO EXAMINE
VIOLATIONS OF THE FOREST
CONSERVATION ACT 1980, IN MUNNAR**

APRIL 2010

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1. Context and Constitution of the Central Team

During the visit of the Hon'ble Minister for Environment and Forests to Kerala on 19th Feb 2010, issues relating to encroachments of forest lands in Munnar of Idukki Dist, Kerala were brought to the notice of the Hon'ble MEF and it was decided that a Central team would visit Munnar to examine whether the Forest Conservation Act 1980 has been violated in Munnar. Accordingly, a Central Team was constituted by the Ministry of Environment and Forest, Government of India, vide letter F.No.1974/ADG (FC)/2010 dated 5/3/2010 and 15/3/2010 for the purpose with the following members:

1. Sri.K.S. Reddy Regional CCF, MoEF, Bangalore (Team Leader)
2. Sri.K.B. Thampi IG of Forests (NAEB), MoEF, New Delhi
3. Dr. Ullas Karanth Wildlife Expert and Member FAC, MoEF
4. Ms. Prakriti Srivastava Joint Director (Wildlife), MoEF, New Delhi

2. Objectives and Scope

2.1 The Terms of Reference of the Central Team were to examine whether the Forest Conservation Act 1980 has been violated by encroachments in Munnar and whether there is any need for the Central Government to get involved to ensure that the forests are protected. The Central Team after discussions with Forest and Revenue officials defined the scope of the present mission. It also took into consideration a specific petition filed by One Earth-

One Life Thrissur, Kerala (a voluntary organization) before the Central Team regarding violation of Forest Conservation Act in Munnar area.

2.2 It was decided that considering the time constraints and priority of issues involved, the Team would restrict its scope in its present visit primarily to examine if Forest Conservation Act has been violated in respect of 17922 acres of land set apart for afforestation to the Forest Department vide GO No (MS) No 379/80/RD dated 18/4/1980 pertaining to Munnar Forest Division.

3. Brief Overview of Kannan Devan Hills Lands

3.1 Brief History:

The extensive forests and plantation areas around Munnar in Devikulam Taluk are known as Kannan Devan Hills. The hills were named after Kannan Thevar, a local headman of the 19th century. The tract was largely unexplored, completely undeveloped and covered with forests and grasslands. In 1877, this wild tract of 227 sq. miles was given under lease to J.D.Munroe (who was then the Superintendent of Cardamom Hills) from the Raja of Poonjar. In 1878, the Maharaja of Travancore ratified the deed. For developing the area, Munroe formed the North Travancore Land Planting and Agricultural Society and its members developed their own estates in various parts of the KDH. Though many crops were tried, tea was finally considered as most suitable to the area. By 1895 most of the estates were purchased by James Finlay and Company. Though the pace of development subsequently quickened, most of the areas still remained wild. By 1960s all the estates in KDH except four, namely Thalayar, Lockhart, Devikulam and Vayalkadavu were owned by the Kannan Devan Hills Produce Company belonging to James Finlay group. In 1976, the Tata

Company came into the picture by associating with James Finlay and in 1983 was in full control of their estates as Tata Tea Limited. In 2005, the Tata Tea Limited handed over the estates to a new company re-named as Kannan Devan Hills Plantation Company Private Limited (KDHPC)

3.2 KDH ACT, 1971 (*Annexure-1*):

In January 1971, the Kerala Government promulgated the Kannan Devan Hills (Resumption of Lands) Act as part of land reforms of the State and the entire extent of KDH lands was taken over by the Government. Accordingly, all lands situated in the Kannan Devan Hills village in Devicolam taluk stood transferred to and vested in Government with effect from the appointed day (21.01.1971) free from all encumbrances except such lands which were exempted under the said Act. The District Collector was also mandated to cause survey, demarcation and notification of the land vested under the provisions of the Act.

3.3 Land Board Award (*Annexure-2*):

Subsequently, the Land Board of Kerala considered the petitions filed by the Kannan Devan Hills Produce Company and after careful consideration of the various issues involved, passed award in Proceedings No.LBA-2-5227/71 dated 29-3-1974. As per this order, 70522 acres of land would continue to vest with the Government free from all encumbrances of which 43452 acres of land was to be 'left as it is'. The KDHP Company was allowed to retain 57359 acres of KDH Lands. Out of the above 70522 acres, the Land Board observed that 'about 5000 acres of land available in the Melacheri river valley for distribution to landless poor'. The rest of the area containing forest growth and being very steep was considered 'not fit for occupation'.

3.4 Expert Committee report (*Annexure-3*):

In 1975, as per G.O. (MS) No. 993/ 75/RD Rev (N) dated 02-09-75, the Government constituted an Expert Committee to *inter alia* advise Government as to how the 70522 acres area that was vested with the Government, was to be utilized. The Expert Committee consisting of the Chief Conservator of Forests, Director, Survey and Land Records, Dy. Director Soil Conservation and the District Collector Idukki (Member Convener) submitted a detailed report on the utilization pattern of the different blocks of lands that were vested with the Government.

3.5 Government Orders on Utilization of Resumed Lands:

Based on the recommendations of the Expert Committee the Government vide G.O. (MS) 379/80/ RD dated 18-4-1980 (*Annexure-4*) approved the pattern of utilization of the land vested with Government under the KDH (Resumption of Lands) Act 1971. Out of the 70450 acres vested with the Government, an area of 43452.8 acres was 'to be left as it is' and an area of 17922 acres was earmarked for afforestation. Sanction was also accorded for the said 17922 acres of land to be transferred to the Forest Department immediately and the District Collector Idduki directed to take immediate action. In 1988, as per G O (MS) No787/88/RD dated 02.11.1988 (*Annexure-5*) a slight modification was made in the above-mentioned GO of 1980. The area 'to be left as it is' was reduced to 43244.5 acres. But there was no change in the area 'set apart for afforestation' i.e. 17922 acres.

3.6 Actions based on Land Board Award and Government Orders:

Based on the Land Board award and Government orders, the area which was ordered to be 'left as it is' was handed over to the Forest Dept. Part of this land

in Eravikulam - Rajamallay area was declared as a sanctuary in 1975 and elevated to the status of a National Park in 1978.

An area of 22253 acres, was also handed over in Mankulam to the Forest Department as per the order No.C4-37166/77 of the District Collector dated 28-6-1980. Subsequently, as per GO (RT) No. 754/ 07/Rev. dated 17-2-2007, it was decided to notify Mankulam area as Reserved Forest and the notification was issued as per GO (P) No 25/2007/F&WLD dated 16.05.2007. It is reported that the Forest settlement is in progress as per the Kerala Forest Act.

Regarding the area set apart for afforestation in Munnar Division even after 30 years, it is yet to be declared as Reserve Forest. The Forest Department had already taken possession of the said lands 'set apart for afforestation' and raised plantations in all the suitable areas and also protected the intervening shola patches and grass lands.

3.7 Proposal of the Forest Department for notification under Kerala Forest Act

The Forest Department has submitted a proposal to notify 17349 acres in the possession of the Forest Department and having the nature of forests in KDH lands as Reserved Forest in Munnar Forest Division to the State Government in 2008. The proposal includes the 16 blocks with 37 bits with their boundary descriptions (*Annexure-6*).

4. Verification of records and discussions

The Central Team visited Munnar from 10th to 12th April, 2010 perused the records pertaining to Kannan Devan Hills lands (KDH lands) in Munnar Forest Division, and looked into the issue if these lands are forest lands and attract the

provisions of the Forest Conservation Act, 1980. The Team conducted site inspections as well as held discussions with officials of Revenue and Forest Departments. The Team also had discussions with the MLA Munnar, District Collector, the representatives of the KDHPC and interested NGOs.

The Team then went to Trivandrum and had discussions with the PCCF Kerala and other senior officials of the Forest Department as well as had discussions with some NGOs on 13th April. The team also had discussions with the Additional Chief Secretary, Home Sri. K. Jayakumar and the Revenue Secretary Ms. Nivedita Haran.

4.1 Discussion with Shri. S.Rajendran, MLA Munnar:

The MLA, Munnar presented his views before the Central team on 11/4/2010 wherein he stated that the KDHPC was the biggest encroacher of Government lands in Munnar. He also mentioned a specific instance where the company had cleared shola Forest in Gudarale Estate to plant tea and that the Central Team may confirm this in its visit.

4.2 Discussion with the District Collector, Idduki:

The main points raised by the Collector during the discussion are as under:

- a) There are encroachments by the KDHPC and large areas are left out of the proposed notification of the Forest Department purposefully to benefit the KDHPC.
- b) One of the blocks identified as forests, Ka Block, is not properly demarcated and there is discrepancy in the extent of the area being notified and the actual area.

- c) Forest areas in Chanduvarai are not being proposed for notification by the Forest Department.
- d) The resurvey conducted by the Survey Department reporting to him, was not correct and the notification submitted by Forest Department was based on these resurvey records which have not been approved and published.
- e) An area of about 1000 acres in Viripara in Mankulam was conceded to the KDHP Company even though it should have been with the Forest Department.
- f) The area intended for Dairy Development has been included in the proposed notification, which was not the intention of the Government.
- g) The land in Kuttiyar valley where pattas have been given by the Government is for meeting the needs of the people in Munnar. This area was not meant for afforestation but for housing purposes and the Forest Department had agreed at the highest level that the area could be distributed to the landless poor but now the Forest Department has included the area in its notification proposal.
- h) Munnar needs to be developed with a focus on tourism for which land is required.

The Collector promised to put his viewpoints in writing before the Central Team with documentary proof. But no inputs were received by the Team in writing. He also promised that he would provide accurate maps to the Forest Department the next day. However it is reported that the maps have still not been received by the Forest Department. The Team notes this with some concern.

4.3 Discussion with Kannan Devan Hills Plantation Company Private Limited:

On 11.4.2010 the MD and other officials of KDHPC stated their position with respect to the lands held by them.

- a) Till 2005 the estates were owned by Tata Tea. Since 2005, a new company was formed with 74% of the shares under the control of the employees, 7% with a trust and the Tata Company retaining 19% of the shares.
- b) The lands in their possession are based on the Land Board Award and are open to any verification and they are not in possession of any extra land.

During the discussion it emerged that the company is managing their lands without an approved Management Plan as per the Forest Conservation Act. The MD, Kannan Devan Hills Plantation Company Private Limited, assured that they would prepare a Management Plan and submit for approval.

4.4 Discussion with NGOs/ Civil Society:

The Central Team also received representations from people and NGOs. The High Range Merchants Association also expressed that the township is facing hardships as most of the lands are with KDHPC. They also expressed that small encroachments are highlighted while the big encroachers are spared.

4.5 Views of the Forest Officials present during the visit at Munnar:

During discussions with the Forest officials on 11/4/2010 it was informed that the KDH lands in Munnar Forest Division for which proposal was submitted to the State Government to notify as Reserved Forest, were mostly well demarcated with permanent cairns and clearly defined boundaries and

free from encroachment. The forest area proposed for notification is in 16 blocks and forming 37 bits. The area in the proposed notification is mentioned as 17,349 acres, though the exact area could be computed only once the area was properly surveyed. Further, the officials produced records of joint verification conducted by Forest and Revenue officials in 13 out of the 16 blocks. They have certified that 13 of these blocks have been jointly verified by the officials of the two Departments and that the boundaries of these 13 blocks are clearly demarcated and free from any encroachment (*Annexure-7*). Later one more block has been verified and there also it was found to have clearly demarcated boundaries and free from encroachments.

4.6 Discussion with PCCF in Thiruvanthapuram:

The Central Team held a discussion with the PCCF Sri. T. M. Manoharan in the forenoon of 13/4/2010. During the discussion the PCCF reiterated his views given in his note dated 25/2/2010 on the "Implementation of Kannan Devan Hills (Resumption of Lands) Act 1971" (*Annexure 8*)

5. Field visits

Field locations were chosen for inspection based on the discussions with the local officials and also considering specific locations where violations were pointed out or suspected.

5.1 Inspection of Block 16 (Seven Malai) on 11/4/2010:

5.1.1 To ascertain the claims made by the Forest Department in the field, inspection was conducted by the Team. The area in Block 16 (seven malai) was verified. The boundaries were perambulated and were found to be

consolidated by permanent cairns, with clear boundaries and free from encroachment. Each permanent cairn constructed by the Forest Department was found to be beside the survey stones laid by the Survey Department in 1977 as informed by the local Revenue officials. The survey points were checked with GPS and as per the readings it was found that the co-ordinates broadly tallied with those with the Forest officials. The description of the boundaries as given in the proposal for notification was also verified and found to be correct. The area supports Eucalyptus plantation raised by the Forest Department.

5.1.2 The next site visited was another bit in the same Block 16 (Seven malai / part) where encroachments were alleged. This is an area not included in the proposed notification. However it is a part of the 17922 acres of land set apart for afforestation and to be transferred to the Forest Department. On inspection of the site, encroachments were found. The area had been cleared up for cultivation and some sheds had been made. The officials informed that the site had been subjected to repeated attempts of encroachment in an area of approximately 45 hectares and three previous evictions had already been done. They further informed that the area involved was not included in the proposal for notification of the area as Reserved Forest based on a decision taken in a Cabinet sub-committee in 2008. This area is a steep hill with all the physical attributes of the land referred in para5.1.1. It was informed that Eucalyptus was raised in this area from 2004 onwards after evicting the encroachment. But it has once again been encroached after clearing the Eucalyptus. The part of this land that is not encroached still supports a good plantation of Eucalyptus.

5.2 Inspection of Kuttiyar Valley Area:

The Team visited the area on 12.04.2010. It was found that the Eucalyptus plantations were cleared and burnt, a few temporary sheds constructed and land development works in progress. It was informed that recently the Revenue Department has distributed pattas in this land. Eucalyptus plantations were being raised in this area (283 acres approximately) from 1965 onwards by the Forest Department and subsequently by Hindustan Newspaper Limited (HNL). This area also has a steep gradient and has all the physical attributes of a forest like the areas surrounding it. It is adjacent to an important stream.

5.3 Inspection of Ka Block:

The next area visited was KA Block where the District Collector has alleged that there is no proper demarcation and there is discrepancy in the extent being notified and the actual area. The portions inspected by the team were found to be well demarcated and consolidated by permanent cairns. Survey stones were found along each cairn and the boundary was also seen demarcated by an old stone-wall (Kayyala). The FSI survey officials accompanying the team took the coordinates at the points of the survey stones, which were found to approximately tally with the readings with the Forest staff. The Forest and Revenue officials agreed that the complete boundary of the Ka block is demarcated by survey stones. The area supports a good Eucalyptus plantation raised by the Forest Department.

5.4 Inspection of Gudarale Estate:

The Central Team then visited the Gudarale Estate of the KDHPC where allegedly shola was converted into tea. However, on inspection it was found that the shola forest has not been felled. Only the Eucalyptus plantation owned by KDHPC around the shola patches had been cleared [after 3rd rotation as informed by the KDHPC] and was being replanted. In some parts, tea plantation has been raised in the felled Eucalyptus area. However the plantations were found right up to the banks of the stream. This is ecologically undesirable. The natural vegetation should be retained on stream banks. The ecological considerations could have been taken care if there was a proper and approved Management plan.

5.5 Inspection of Mankulam Division

The Team visited Viripara area in Mankulam Forest Division but due to want of proper maps and records, could not conduct verification by matching GPS readings with reliable maps at the right spatial scale. The State Government/ Forest Department needs to look into the matter of alleged encroachments by the KDHPC in this area and take appropriate action as per existing laws and rules.

6. Findings

6.1 Legal status of KDH lands proposed for notification as Reserved Forest in Munnar Forest Division

KDH lands proposed for notification support forest plantations and natural shola-grassland ecosystems. The lands are forests in terms of their physical status and as per one or more of the following records:

- a) The agreement between the Poonjar Raja and John Munroe dated 11/07/1877 (*Annexure-9*).
- b) The Land Board Award dated 29/3/1974 (*Annexure-2*)
- c) Report of The Expert Committee (*Annexure-3*).
- d) Working Plan of Munnar (1994-95 to 2003-04) in which list of plantations are mentioned (*Annexure 10*)
- e) The report of the Committee constituted as per the directions of the Hon'ble Supreme Court in their judgment-dated 12.12.1996 in Writ Petition No. 202/95 and chaired by Shri.V. Gopinathan, IFS, Conservator of Forests *inter-alia* to identify the areas which are forests irrespective of whether they are so notified or classified under any law and irrespective of the ownership. (*Annexure-11*).

From all these records it is clear that the lands are forests legally and as per records, besides physically having the nature of forest of high ecological and conservation values. The land involved therefore attracts the provisions of the Forest Conservation Act and cannot be diverted for non-forestry purposes without clearance of the Central Government, irrespective of ownership.

At present these lands are governed by the KDH Act, 1971 which does not have provision for booking cases for tree felling. There is only provision for summary eviction in case of encroachments. To ensure adequate protection and conservation, these lands need to be brought under effective legal framework.

6.2. Ecological importance of lands proposed for notification

The lands proposed for notification are lying as large forested patches in the Kannan Devan Hills and are ecologically important. This mountainous landscape is surrounded by four National Parks namely Eravikulam, Anaimudi, Pampadumshola and Mathikettan and two Wildlife Sanctuaries namely, Kurunjimala and Chinnar. In all the sites visited by the Team, signs were noticed that indicate that the area is a habitat for a variety of wild animals. The forest offers connectivity and acts as corridor for movement of several endangered species such as Nilgiri Tahr, Gaur, Elephants, tigers etc. A study by the French Institute, Pondicherry has classified these forests as High Value Biodiversity areas. These lands are also important catchments of major rivers. They also ensure perennial water supply to the people downstream including estate labourers and tribals. A report ‘The high degree of endemism in the shola grasslands of Munnar and its environs’ by Prof. E. Kunhikrishnan, Dept. of Zoology, University College, Thiruvananthapuram indicating the ecological importance of the area is enclosed as *Annexure-12*.

6.3 Encroachments/Violations of Forest Conservation Act

Although records indicate that there were attempts of large-scale encroachments in the past in this area, at present no such encroachments are reported. However, violation of the Forest Conservation Act, 1980/encroachments were observed in the areas of Kuttiyar valley and Seven Malay (part) referred to in para 5.2 and para 5.1.2 respectively.

Kuttiyar valley

The land ordered to be distributed by the Revenue Department comes well within the meaning of the term "Forests" defined by the Hon'ble Supreme Court in the judgment dated 12/12/1996 in WP(C) 202/95. Hence any action to convert the "Forest" land for non-forestry purpose without obtaining clearance from Government of India under the Forest Conservation Act amounts to contempt of the Hon'ble Supreme Court.

However, the need for providing housing for the landless poor is also a practical necessity in Munnar area and the State Government could get approval as per rules under Forest Conservation Act. The State Forest Department may take a view whether to defer inclusion of this area from the proposed notification. The State Government may also ensure that a Master Plan for development of this housing area is made and that development of this area is as per the management plan so that the ecology of Munnar is least disturbed. Committee observed that the proposed housing site is adjacent to a stream and the whole area is ecologically very important.

Seven Malai area

The Team observed that a portion of land in Sevenmalai is under encroachment. The area has been left out of the notification apparently to allot it for horticulture/ vegetable cultivation. The Central Team observed that the land comes under the purview of the Forest Conservation Act, as per records and in terms of physical and legal status under the Hon. Supreme Courts orders of 12/12/1996 in the WP 202. If this area is considered by the State Government as absolutely needed for the people

for vegetable cultivation, the State Government should follow the due process of law and obtain clearance under Forest Conservation Act.

6.4 Apprehension of encroachments/violations in future.

There is wide spread fear/apprehension that lands set apart for afforestation in Munnar Division may also be distributed for non-forestry purposes by the District Administration/State Government in future particularly in view of the District Administration distributing pattas in Kuttiyar valley without complying with the provisions/spirit of the Forest Conservation Act 1980 and orders of the Supreme Court dated 12.12.1996 in WP 202/95.

6.5 KDHPC Lands

The area of tea plantations with the Company as per the Land Board Award is 23549 acres while the balance area includes large extents of sholas, swamps, water-bodies, grasslands, fuel wood, etc. which are ecologically very important for a high altitude region like Munnar. It is pertinent to note here that these ecological considerations were reflected in the KDH -Deed of Notification dated 11th July 1877 .The exact clause reads as follows

"The grantee shall be bound to preserve the Forest trees growing on the banks of principal streams running through the tract to the extent of 50 yards of breadth on each side of the stream, the under wood only being permitted to be cleared and the land planted. Similarly he shall also be bound to preserve the trees about the crest of hills to the extent of a quarter mile on each side"

The spirit of the clause is much more relevant today with more pressure on the land due to increased pace of development. Therefore a Management Plan which takes care of the ecological needs of the area is essential which is also mandatory as per the Forest Conservation Act 1980.

6.6 Issuing of the Notification as Reserve Forest

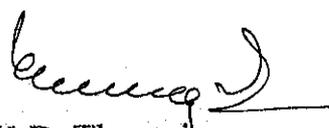
The Forest Department has submitted a proposal to notify 17349 acres in the possession of the Forest Department and having the nature of forests in KDH lands as Reserved Forest in Munnar Forest Division to the State Government in 2008. The proposal includes the 16 blocks with 37 bits with their boundary descriptions. For notifying these lands as Reserve Forests it is not necessary to wait for detailed surveys, maps and computation of exact areas. This was the procedure adopted by Government of Kerala while issuing notifications under the Kerala Private Forests (Vesting and Assignment) Act, 1971 and The Kerala Forests (Vesting and Management of Ecologically Fragile Lands) Act, 2003. A proper survey and mapping of the area could be conducted after issuing notification.

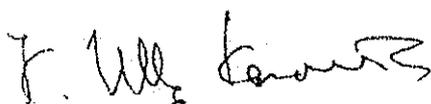
7. RECOMMENDATIONS

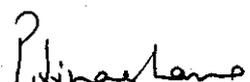
- 1.** The lands proposed by the Forest Department for notifying as Reserved Forest in KDH lands in Munnar are ‘forests’, physically, legally and as per records and accordingly come under the purview of the Forest Conservation Act 1980 as per the directions of the Supreme Court in WP 202/95. The lands are clearly identifiable in field, demarcated and having well defined boundaries. To ensure that these lands are protected as

- forests, these lands may be immediately notified as Reserved Forest in the first phase, and, detailed survey and mapping can follow.
2. All other KDH lands having the nature of forests coming under the preview of the judgment in WP 202/95 may be notified as Reserved Forests in second phase.
 3. The Kerala Forest Department should make available accurate lat-long readings in respect of all bits of forests/deemed forests in KDH lands in Munnar Forest Division using advanced equipment/survey techniques and put this information out in the public domain.
 4. If any forest area is absolutely necessary for non-forestry purpose, then the State Government should follow the due procedure and process as per the Forest Conservation Act to seek all prior clearances. In respect of any area so far diverted without following due procedures, the State Government should immediately submit proposal in this regard to the Central Government.
 5. As per the Forest Conservation Act 1980 the KDHPC should manage the lands under their control as per Working Plan/ Management Plan approved by Government of India. The Company should be directed to submit a detailed Management Plan including maps clearly specifying the extent and areas under different land use.


K.S. Reddy
(Team Leader)


K.B. Thampi


K. Ullas Karanth


Prakriti Srivastava

**LIST OF PERSONS WHO ACCOMPANIED THE CENTRAL TEAM
IN MUNNAR**

- | | | |
|-----|----------------------------|--|
| 1. | Shri C.S.Yalakki | -CCF (Protection) |
| 2. | Shri Teggi IFS | - CCF (Regional South) |
| 3. | Shri Bennichan Thomas IFS | - CF (High Range Circle) |
| 4. | Shri Mahesh Kumar | - DFO Munnar |
| 5. | Shri Sunil Babu, | - WLW Munnar |
| 6. | Shri K.S. Justin Stanley | - ACF Munnar |
| 7. | Shri Joshy Sebastin, | - Range Officer, Munnar |
| 8. | Shri M.A. Sasidharan Nair, | - Forester Munnar |
| 9. | Shri N.S. Sree Kumar | - Deputy Tehsildar, Devikulam |
| 10. | Shri K.D.Vijayan | - Deputy Tehsildar, Devikulam |
| 11. | Shri Bijn Augustia | - LDC, RDO office |
| 12. | Shri Ratan Sharma, | - Forest Survey of India,
Bangalore |
| 13. | Shri S. Sampath, S.T.A. | - Forest Survey of India,
Bangalore |

ANNEXURES

- Annexure 1 :** Kannan Devan Hills (Resumption of Lands) Act 1971.
- Annexure 2 :** Land Board Award 1974.
- Annexure 3 :** Expert Committee Report 1977.
- Annexure 4 :** GO MS. No. 379/80/RD dated 19.4.1980 regarding distribution of 70522 acres in KDH Lands.
- Annexure 5 :** GO MS. No.787/88/RD dated 2/11/1988
- Annexure 6 :** Proposal of Forest Department for notification under Kerala Forest Act.
- Annexure 7 :** Joint verification report of Forest and Revenue Departments
- Annexure 8 :** Note of PCCF dated 25.2.2010 on 'Implementation of Kannan Devan Hills (Resumption of lands) Act 1971, proposal for reserving 17922 acres of Kannan Devan Hills Lands under the provision of the Kerala Forests Act.
- Annexure 9 :** Agreement between the Poonjar Raja and John Munroe dated 11.07.1877
- Annexure 10 :** Areas listed as plantations in Working Plan of Munnar
- Annexure 11 :** Gopinathan Committee Report
- Annexure 12 :** The high degree of endemicity in the Shola grasslands of Munnar and its environs by Prof. E. Kunji Krishnan, Department of Zoology, University College, Thiruvananthapuram