



**ENVIRONMENTAL FOUNDATION  
(GUARANTEE) LIMITED**

**COMMENTS ON THE WILPATTU NATIONAL PARK  
MANAGEMENT PLAN 2019-2024**

**07.01.2019**

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Mr. S. Hettiarachchi  
Secretary to the Ministry of Tourism Development, Wildlife and Christian Religious Affairs  
6th Floor, Rakshana Mandiraya,  
No 21, Vauxhall Street,  
Colombo 02

Dear Sir,

### **Comments on the Wilpattu National Park Management Plan**

#### **General Comments:**

Section 2A of the FFPO mandates for the formulation of a management plan, which is to be prepared in accordance with the provisions of the Fauna and Flora Protection Ordinance (FFPO).

Reiterating the purpose of the FFPO- An Ordinance to provide for the protection and conservation of the fauna and flora of Sri Lanka and their habitats; for the prevention of commercial and other misuses of such fauna and flora and their habitats; for the conservation of the biodiversity of Sri Lanka.

As such the FFPO advocates strongly for conservation and that everything else is held secondary. However, quite dishearteningly the Wilpattu National Park Management Plan 2019-2024 fails to sufficiently adhere to the statutory norms underlined in the FFPO, instead development of the tourism sector is prioritized over the addressing of the ecological needs of the park for the conservation of the fauna and flora of the park.

Further, it is quite uncomfortably noted that certain recommendations in terms of action plans and measures do not fall in line with stipulations of the FFPO, examples of which will be discussed in detail below.

Section 2B of the FFPO stipulates that, prior to carrying and giving effect to any activity under a Management Plan, requires an assessment of the impacts of such activity on the fauna and flora and their habitat to be made.

However, upon the perusal of the Management Plan, it is evident that no such assessment has been carried out, the recommendations are ad hoc and are not substantially validated by scientific research or findings. Recommendations and actions that are not well understood can be detrimental to the overall aim underpinning the need for a Management Plan, "Conservation".

Certain issues on conservation are stated in a dispersed manner which takes away from the magnitude of conservation issues, that need to be directly addressed. The prioritization of the identified thematic areas as opposed to translating the idea of conservation reflects heavily on a development framework.

Areas that should have been addressed extensively:

Customary Practices- meaningful regularization in terms of Section 3 (3) B of the FFPO

Objective 4.7- should have expanded to include the externalities that are accrued as a result of unsolicited decision making. Such as the measures that are in place in terms of resettlement of displaced people during the war and settlements within and the peripheral areas of the WNP. Resettlement is and continues to have an adverse impact upon the ecology of the park, therefore, it is imperative for this to be addressed in detail with clearly identified regulations to effectively conserve park resources.

Mention of resettlement, is brief in the presented plan with a strategy and actions for resettlement purposes mentioned without detail. The notion premised is that resettlement is to be permitted within the ecological boundaries of the park.

Waste Management within the WNP is not addressed in the presented plan. Regulations to stipulate the use of polythene and and effective monitoring systems to ensure waste is minimized and effectively disposed of is necessitated.

A stringent Coastal monitoring system has to be bought in place. The western boundary of the park is flanked by a part of the Indian ocean, a region of uniqueness for the presence of marine mammal species such as the Indo- Pacific Finless Porpoise, Dugongs and Indian Ocean Humpback Dolphins. The conservation of these species should be addressed directly, and its conservation and protection should be stipulated under the Marine Unit of the DWC.

**Programme 1: Park operations**

The Management Plan identifies that the Department of Wildlife Conservation (DWC) is faced with funding difficulties, which has resulted in low staffs, which is a significantly contributing factor in weakening the departments stakes in effectively implementing and regulating the WNP.

However, measures that are used to raise revenue by attracting tourist and monetizing the park has to be done in a sustainable and environmental manner whilst adhering to the FFPO. Further, without extensively relying on remuneration from tourism, the DWC can take steps to effectively utilize the existing funds such as the 'Wildlife Preservation Fund.'

As such the below mentioned actions are notably problematic:

- 1.3 "Inter-sectoral harmony and agreement and harmony on the primacy of conservation.....is essential if biodiversity is to survive."
- The DWC at all times has to advocate for the conversation of the WNP, even if the other intergovernmental agencies are having contradictory interest. The DWC as mandated should not compromise on conservation, rather should ensure that the developments taking place are conducive to the environment of the WNP. Harmony is vital, however, the process of arriving at it, should not sabotage the underlying cause of "conservation".

- When identifying illegal settlements within the protected areas, it is imperative that the legal settlements and occupants land use patterns too are considered. Further management regulations or standards on land release and should be strictly implemented;
- Section 6 of the FFPO prohibits amongst other things the below-mentioned activities;
  - Make any fresh clearing
  - Construct or use any road or path so constructed
  - Construct or manage any tourist hotel or provide any service or facility similar to the services or facilities provided by a tourist hotel.
  - Introduce any waste material, garbage or any other material which is likely to pollute.

As such all activities proposed under 1.9 should be in accordance with and adherence to the aforementioned provisions, which will not cause disturbance to the biodiversity within the WNP.

- 1.5 “Ensure that all road entry points are manned and controlled at all times”  
Currently traffic enters and passes through Eluwankulam and Mulliakulam entry points without significant scrutiny. The road known as the B379 has in essence become a thoroughfare for the transfer of goods and people from Puttalam to Mannar. A clearly explained strategy to manage the movement of vehicular traffic which falls within the boundaries of the WNP is required. The mentioned actions are weak and do not address the illegality of entry into a national park under stipulations set in Section 5A of the FFPO.

### **Programme 2: Tourism Development and Visitor Use**

- The Management Plan makes recommendations for the development of infrastructure such as building new roads, tracks, bungalows.
- Section 3A of the FFPO prohibits the construction of tourist hotels within a one-mile radius of a National park such as the WNP. Section 9A of the FFPO expands to cover any development activity by the state or private party within a one-mile radius without the Director General's (DG) approval. The DG prior to giving approval should direct the applicant to carry out an Initial Environmental Assessment (IEA) or Environmental Impact Assessment (EIA), and due procedure associated with an EIA has to be met with before approvals could be granted.
- Therefore, each developmental proposal ought to be validated by IEA or an EIA before clearance could be granted, as such making certain recommendations superficial as given the dynamics of the WNP.
- Promoting tourism, in the context of the WNP should be viewed along the lines of ecotourism as the tourist visiting the WNP should be sensitized about merging into

the ecosystem as opposed to disrupting the normal course of such natural ecosystems.

- The capacity of tourist entering the WNP too should be closely monitored, ensuring there is an upper limit placed in terms of the entrance to ensure that the biodiversity is not disrupted by the influx of tourists.
- 2.4 The Wildlife habitats should not only be deemed as a commodity for sale, but the inherent need for conservation too should also be viewed in isolation.
- Include marine fishing communities and regularize fishing practices, such as enforcing the Fisheries and Aquatic Resources Amendment Act, No 11 of 2017, dealing with banning bottom trawling and other harmful practices of the principal act of 1996.
- 2.1 “Improve the facilities at bathing point in Kudiramalai and establish bathing points at appropriate locations (Kala Oya, Maklanmaduwa and Kokmote).” Bathing within the park should not be encouraged, the use of soaps will cause irreversible damage to the aquatic ecosystems. Furthermore, establishing bathing points within the park would increase the likelihood of human-wildlife conflict.  
2.3 “Continuously monitor the Pallekandal church festival activities with an upper limit to the number of pilgrims that can camp inside the park during the festivities to be reached in consultation with the church authorities.” In addition to monitoring church festivities, regulations need to be formulated, implemented and adhered to during the holding of the annual church festivities. Further, an upper threshold on attendees needs to be ratified or else, it leaves room for the threshold to be subject to change at convenience.

### **Programme 3: Environmental Management**

- It is concerning that statements without scientific backing is mentioned in the management plan. For example, 3.2 “The park is too small to support viable populations of leopard, sloth bear, elephant, lesser adjutant stork, crimson-backed woodpecker, spot-breasted eagle owl, and probably some other species.” Reference scientific studies, need to be mentioned to identify the basis on which these statement were made. A simple google scholar does not reveal any potential citations.

### **Programme 4: Outreach**

- 4.4 “Move away from an angry and antagonistic approach to elephants.” Further clarification and explanation on such an alternative approach needs to be expanded upon. Mentioning off broad statements without the knowhow of effectiveness can be detrimental to conservation – as this would only enhance the distrust between the community and the implementing personnel/ authorities.

**Other Comments: Strategic Management Framework (SMF) (2017-2021)**

- The SMF developed by the Department of Wildlife Conservation in the year 2017, puts conservation is the forefront, its rightful place. Whilst considering diverse thematic areas the findings of the SMF was a collaborative effort of many stakeholders who are experts in their own fields. However, the currently proposed management has taken a course of its own, deviating from the initially prepared SMF, prioritizing tourism, which calls into question the legitimacy of the proposed present-day management plan and the motives underpinning such a decision.
- Further, the SMF has identified critical areas of contention have not been addressed by the proposed management plan such as the:
  1. Illegal road within the National Park
  2. Threats posed by traditional fishing villages
  3. The Pallekandal Church
- Sustainable recommendations on promoting tourism identified in the SMF have been overlooked. Conservation and the sustainability of the National Park cannot be compromised to facilitate tourism. As such as proposed by the SMF identifying a co-area prior to engaging in any tourism upgrades, will be a good starting point.

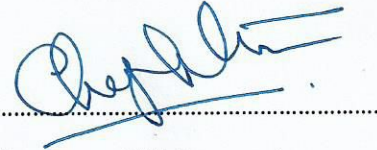
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