

To

July 30, 2008

Dr Manmohan Singh,
Prime Minister of India and Minister for Environment
Government of India.

Respected Sir,

Sub: Drop the National Biotechnology Regulatory Authority proposals mooted by the DBT immediately

A group of fifty farmer leaders and NGO representatives from fifteen states of India met on July 24th 2008 to debate and deliberate on the proposals put forward by the Department of Biotechnology to set up a National Biotechnology Regulatory Authority [NBRA], through a new legislation proposed called the National Biotechnology Regulation Bill, 2008. In addition, civil society groups created a debate on the NBRA proposals through other means, in other cities too. Through this letter, we would like to bring to your attention our objections and concerns, keeping the national interest in mind, with regard to the NBRA.

We object to the very process of the formulation of this draft Bill by DBT and its so-called consultative processes [run in a few cities with very little time provided for comprehensive debate and discussion on the proposals and with no involvement of primary stakeholders]. Farmers' organizations and consumer organizations have not been involved and no bottom-up processes have been used to come up with these proposals.

After going carefully through the proposals, we demand that the NBRA proposals be dropped immediately since the draft legislation has serious shortcomings and objectionable clauses.

1. While the Swaminathan Task Force report which first mooted the idea of an NBRA stated: *"the bottomline for any biotechnology regulatory policy should be the safety of the environment, the well being of farming families, the ecological and economic sustainability of farming systems, the health and nutrition security of consumers, safeguarding of home and external trade and the biosecurity of the nation"*, these very cornerstone recommendations do not find a place in the draft proposals. The Preamble to the draft Bill is a give-away of the blatant pro-biotech leanings of the new proposals.
2. As you know, a recent United Nations report pointed out the lack of biosafety capabilities in India (like in many other countries) especially with regard to bio-terrorism with the use of biotechnology. In this context, it would be disastrous to go in for a single-window, fast-track clearance system in the form of NBRA, just to appease the biotech industry at the expense of the security, health and environment of the nation.
3. While one of the ostensible reasons for bringing in a separate legislation and for setting up the NBRA is to remove the existing conflict of interests in the current regulatory regime, the very fact that the NBRA would be set up under the Department of Biotechnology (which has the mandate of promoting modern biotechnology) would reinforce such a conflict of interest. This is unacceptable and totally inconsistent with the spirit of such legislation as spelled out by Dr M S Swaminathan in his task force report. Sadly, even Dr Swaminathan has turned a blind eye to what he had said in the task force report.

4. A single-window, fast-track clearance system proposed in the NBRA draft is not at all necessary and actually leaves much space for unscientific, undemocratic and corrupt functioning with very little checks and balances. In that sense, this is a Bill that has been created by the wrong people for the wrong reasons, with wrong perspectives with potential disastrous consequences.
5. The institutional mechanism of decision-making in the NBRA, with a 4-member committee consisting of scientists taking all decisions is undemocratic and authoritarian (Section 11(1)). It has been found time and again that even a broad-based and inter-ministerial body like the Genetic Engineering Approval Committee (GEAC) is unable to address all stakes and concerns during decision-making. Even though the NBRA proposals talk about various committees and offices to be set up, all of them have been given only an advisory role and the narrow 4-member 'Products Ruling Committee' clearly is not bound by the advice and recommendations of all these various units and committees.
6. The NBRA denies and violates the constitutional right of state governments over their agriculture. There is not only no role allowed for state governments in decision-making under the NBRA, there is a denial of their state level mechanisms and regulations over their agriculture pertaining to biotechnology. This is completely unconstitutional (Section 25, 33(2)).
7. As per the provisions of Section 31 the NBRA is allowed to amend the first schedule, and this defeats the very purpose of a separate legislation for regulation and takes away the power of the elected parliamentarians over this law.
8. The over-riding effect of the NBRA on other existing regulations is a matter of serious concern. It tramples upon the Biological Diversity Act, for instance. (Section 29)
9. Similarly, Section 33 (4) specifies time frame of three years for appeals on the repealed act is unacceptable as problems can arise with earlier decisions, given the imprecise and unpredictable nature of transgenic technology.
10. It is very obvious that within the NBRA, risk assessment will be on narrow technical parameters and it is not clear how all the other cornerstones of regulation laid down by the Swaminathan Task Force report will be met.
11. The NBRA proposals do not contain any clauses related to conditional approvals, for a limited period, subject to review and revoking of approvals. It appears that an approval would be valid for all time to come, irrespective of other considerations!
12. There are no provisions in the NBRA for liability, redressal and remediation. As we know from past experience from across the world, even confined trials could involve losses and damages related to contamination and recalls which will cost a lot in terms of redressal and remediation. NBRA makes no mention of making the GM developer liable for redressal and remediation.
13. Even the penalty clauses have been left to be evolved in the Rules. Section 16 related to penalties and offences, an offence is narrowly defined to include only offenders "who knowingly fail to comply" and leaves room for misuse.
14. Under Section (8), no wrongful decision of the NBRA can be invalidated and leaves room to justify almost anything.

15. The scope of the NBRA, for some inexplicable reason, does not cover storage, distribution and export of GMOs and products thereof. This leaves a vast area of regulation out of the scope.
16. The NBRA proposals don't talk about any mandatory prior informed public consent in its decision-making; this is a violation of the principle enshrined in the Cartagena Protocol. The NBRA proposes to make only decisions of the body public, but not the bases on which decision-making took place; it also does not talk about how public will be involved in decision-making. All of this will only reinforce the current non-credible, opaque functioning of regulators.
17. The NBRA seems to negate and discount the existing systems of seed assessment and regulation by having over-arching and over-riding decision-making authority.
18. The NBRA seeks to make amendments to the Food Safety & Standards Act with regard to clauses that govern GM foods' regulation. The proposal to alter the definition of GM foods under the FSSA is obviously a way to scuttle the labeling regime of GM foods and this is objectionable.
19. The Appellate Tribunal proposed to be set up under the NBRA is not acceptable in its constitution and is not broad based to include farmers' and consumers' representatives. Further, an appeal to be filed within 30 days is unreasonable – given that GM technology is unpredictable and any appeals mechanism cannot be time-bound with such technologies. Further, bar on judicial reviews on decisions taken by the Appellate Tribunal is objectionable (Section 20(2), (4), 26).

Given all the above unacceptable clauses and proposals in the NBRA, we demand that the NBRA proposals be dropped immediately. What we in fact need is utmost consideration to be given to protecting and conserving our biodiversity, environment and health, with due consideration also to ethical, social and cultural issues involved with the application of modern biotechnology. There is a dire need to go beyond narrow risk assessment. There is a need to uphold the rights of states and citizens to remain GM-Free.

We believe that what India needs is not the NBRA but a statutory framework with the mandate of protecting and conserving the environment and health, food and nutrition security, farmers' rights and livelihoods and ensuring social justice (from the application of modern biotechnology) and such a framework should be based on the Precautionary Principle.

It is important for the Government of India to note and learn that across the world, intense scientific processes like the IAASTD (International Assessment of Agricultural Science & Technology for Development) are concluding that Genetically Modified crops and foods are not the way forward and that ecological agriculture is the way forward. Any proposal like the NBRA would therefore be unwise and incongruous and we urge you to intervene and get the current proposals dropped immediately.

Sincerely,

Sd/- as below.

CC: 1. Minister for Health & Family Welfare
2. Minister for Agriculture

3. Secretary, Department of Biotechnology
4. Dr M S Swaminathan, Member of Parliament

Sd/-:

1.	Yudhvir Singh, Bhartiya Kisan Union; National Convenor of Indian Coordination Committee of Farmers' Movements, New Delhi
2.	Sunilam, Kissan Sangharsh Samiti, Madhya Pradesh
3.	Chukki Nanjundaswamy, Karnataka Rajya Raitha Sangha, Bangalore, Karnataka
4.	Dr. Nammalvar, Tamil Nadu Organic Agriculturists Movement, Trichy, Tamil Nadu
5.	Ramanjaneyulu & Kavitha Kuruganti, Centre for Sustainable Agriculture, Hyderabad, Andhra Pradesh
6.	Kannaiyan Subramaniam, Thamizhaga Vivasayigal Sangham, Tamil Nadu
7.	Umendra Datt, Kheti Virasat Mission, Jaito, Punjab
8.	Usha S & Sreedevi Lakshmi Kutty, THANAL, Trivandrum, Kerala
9.	Shiraz, Gorakhpur Environment Action Group, Uttar Pradesh
10.	Utkarsh Sinha, Centre for Contemporary Studies & Research, Lucknow, Uttar Pradesh
11.	Sridhar R, Kerala Paddy Protection Forum, Trivandrum, Kerala
12.	Devinder Sharma & Bhaskar Goswami, Forum for Biotechnology & Food Security, New Delhi
13.	Jagannath Chatterjee, Living Farms, Bhubaneswar, Orissa
14.	Balbir Singh Billing, Bhaichara Kisan Sangathan, Punjab
15.	Dharmendra Kumar, FDI Watch, New Delhi
16.	Chandan Mukherjee, SEVA, Kolkatta, West Bengal
17.	Wilfred d'Costa, INSAF, New Delhi
18.	Anil Chaudhary, PEACE, New Delhi
19.	Alka Awasthi, CECOEDECON, Jaipur, Rajasthan
20.	Satish Natrajan, Sahaja Samrudhha, Karnataka
21.	Nilesh Desai, SAMPARK, Jhabua, Madhya Pradesh
22.	Kapil Shah, Jatan, Baroda, Gujarat
23.	Mathew, CYDA, Pune, Maharashtra
24.	Nitin Mate, YUVA, Nagpur, Maharashtra
25.	Jaikrishna & Rajesh Krishnan, Greenpeace, Bangalore
26.	Manoj Chauhan, Human Rights Lawyers Network, New Delhi
27.	Shefali Sharma, Researcher, Trade & Agriculture, New Delhi
28.	Dr Vithal Rajan, Development Activist, Hyderabad, Andhra Pradesh
29.	Dr Vandana Shiva, Navdanya, New Delhi
30.	Dr Mira Shiva, Public health activist, New Delhi
31.	Megha Mann, Staff Correspondent, The Tribune, Punjab
32.	Dharmendra Malik, Bhartiya Kissan Union, Uttar Pradesh
33.	Bharat Mansata, Vision Acres, Van Vadi, Maharashtra
34.	F Variava, Sahayak Trust, Mumbai, Maharashtra
35.	Vinita Mansata, Earthcare Books, Kolkatta, West Bengal
36.	Prof Trilochan Sastry, Professor, Indian Institute of Management, Bangalore
37.	Himanshu Thakkar, South Asia Network on Dams, Rivers & People, New Delhi
38.	Ujjwala Pendse, Dr M L Dhawale Memorial Trust, Thane, Maharashtra
39.	Umesh Varma, Development Activist, Hyderabad, Andhra Pradesh
40.	Aruna Rodrigues, Sunray Harvesters, Mhow, Madhya Pradesh
41.	Afsar Jafri, Focus on the Global South India, Mumbai
42.	Satinath Sarangi, Bhopal Group for Information & Action, Bhopal, Madhya Pradesh
43.	Dr G P I Singh, Professor & Head, Preventive & Social Medicine, Dayanand Medical

	College and Hospital, Ludhiana, Punjab
44.	Suhasini Mulay, Individual, Mumbai
45.	Dr M S Chari, Former Director – Central Tobacco Research Institute and Managing Trustee, Centre for Sustainable Agriculture, Hyderabad
46.	Smitu Kothari, Director, Inter-Cultural Resources, New Delhi
47.	Shoma Chatterji, Freelance Journalist & Author, Kolkatta, West Bengal
48.	Dr Suresh Mishra, Bhopal, Madhya Pradesh
49.	Prof Jagmohan, Association for Democratic Rights (Punjab) and Shahid Bhagat Singh Research Committee, Ludhiana, Punjab
50.	Prof Rama Melkote, Anveshi and Retd. Professor of Political Science, Osmania University, Hyderabad, Andhra Pradesh
51.	Raj Sadosh, President, Lekhak Parishad, Abohar, Punjab
52.	Pandurang Hegde, CHIPKO-APPIKO Movement, Sirsi, Karnataka
53.	Chennaiah Poguri, Secretary-National Coordination, APVU (AP Agricultural Workers' Union), Chittoor, Andhra Pradesh
54.	Prof T S Ananthu, Navadarshanam Trust, Krishnagari, Tamil Nadu
55.	Navnit Joshi, Triveni Media Consultancy Services, Chandigarh
56.	Lakshmi Suryanarayanan, Educationist, Chennai, Tamil Nadu
57.	Zakir Hussain, Plant Pathologist, Centre for Sustainable Agriculture, Hyderabad, AP
58.	Prof Ajit Kumar, School of Engineering & Technology, IGNOU, New Delhi
59.	Gobind Thukral, Editor, South Asia Post
60.	Kabir Khan, Pahal, Bhai Ghaniyaji Public Welfare Library, Jalandhar, Punjab
61.	Kultar Singh Sandhwan, Giani Zail Singh Center for Rural Development, Faridkot, Punjab
62.	Jaya Iyer, Bhumi-ka, New Delhi
63.	Prabhjot Sodhi, National Coordinator, GEF-UNDP Small Grants Programme, Centre for Environment Education, New Delhi
64.	Inderjit Nandan, Hoshiarpur, Punjab
65.	Sudhir Aggarwal, Berlin, Germany
66.	Jyoti and Janardhana Mamtora, Corporate Trainers, Vadodara, Gujarat
67.	Ponnambalam, Managing Trustee, CREATE, Paramakudy, Tamil Nadu
68.	Ashok Sharma, Take Action Teams Project, South West Asia
69.	G John, Pragathi Seva Samithi, Warangal, Andhra Pradesh
70.	Sanyasi Rao, ARTS, Srikakulam, Andhra Pradesh
71.	Vishwanadh, VIKASA, Visakhapatnam, Andhra Pradesh
72.	R Lingaiah, CROPS, Warangal, Andhra Pradesh
73.	Saraswati Kavula, Film maker, Hyderabad, Andhra Pradesh
74.	Luit Goswami, Rural Volunteers Centre, Assam
75.	Shveta Kaul, Youth4Change India, Pune, Maharashtra
76.	Shailesh Shah, Baroda, Gujarat
77.	Sheelu Francis, Tamil Nadu Women's Collective, Tamil Nadu Resource Team, Kalanjium Farmers' Association, Tamil Nadu
78.	Arun Ambatipudi, Chetna Organic, Hyderabad, Andhra Pradesh
79.	Shiva Shankar, Rakshana, Guntur, Andhra Pradesh
80.	Kisan Mehta, Save Bombay Committee, Mumbai, Maharashtra
81.	Priya Salvi, Prakruti, Mumbai, Maharashtra
82.	Krishna Prasad, Sahaja Samrudhha Organic Farmers' Movement, Karnataka
83.	Nagendra Khangarot, Budget Analysis Rajasthan Centre, Rajasthan
84.	G John, THREAD, Jatni, Orissa
85.	Dr Tarak Kate, Dharamitra, Wardha, Maharashtra
86.	Sangita Sharma, Annadana Soil & Seed Savers Network, Bangalore, Karnataka
87.	Dr Thomas Varghese, Chairman, Kerala State Agriculture Prices Board,

	Thiruvananthapuram, Kerala
88.	Prof M K Prasad, Chairman and MD, Information Kerala Mission, Thiruvananthapuram, Kerala
89.	Dr A S K Nair, Scientist, Centre for Earth Science Studies, Aakulam, Thiruvananthapuram, Kerala
90.	Adv Daisy Phillipose, Lawyer, High Court, Kochi, Kerala
91.	Satheesh Sathyavardhan, SAMVADA, Bangalore, Karnataka
92.	C R Neelakantan, Political Activist and Environmentalist, Ernakulam, Kerala
93.	Purushan Eloor, Periyar Malineekarana Virudha Samithi, Kochi, Kerala
94.	Robin C A, Chief Editor, Keraleeyam Monthly, Thrissur, Kerala
95.	Ms Eliyamma Vijayan, Director, SAKHI Womens Resource Centre, Thiruvananthapuram, Kerala
96.	Dr Santhi, Scientist and Environmentalist, Thiruvananthapuram, Kerala
97.	Ms Deepa Gopinath, Lecturer, College of Engineering, Thiruvananthapuram, Kerala
98.	S Guruvayoorappan, Wildlife Preservation Society of India - South Zone, Palakkad, Kerala
99.	Sri Ribhurajan, President, Santhi Yoga Satsangham, Thiruvananthapuram, Kerala
100.	Air Commd. S Radhakrishnan (Retd.), Consultant, Thiruvananthapuram, Kerala
101.	Brig. Oommen John Retd.), HRD Consultant, Thiruvananthapuram, Kerala
102.	Varghese Thoduparambil, Karshaka Munnettam, Muriyad, Thrissur, Kerala
103.	Dharmarajan, Jaiva Karshaka Samithi, Thrissur, Kerala
104.	Sreekumar P R, GREENS, Thiruvananthapuram, Kerala
105.	Rony Joseph, INFACT, Pala, Kottayam, Kerala
106.	S Chandrasekharan Nair, Kerala Farmers Internet Forum, Thiruvananthapuram, Kerala
107.	Adv Pourn, General Secretary and Jacob V Lazer, Treasurer, People's Union for Civil Liberties, Kerala
108.	Ms Nalini Naik, Generla Secretary, Self Employed Womens Association (SEWA-Kerala), Thiruvananthapuram, Kerala
109.	Saroop Roy, Equations, Thiruvananthapuram, Kerala
110.	T P Padhmanabhan, SEEK, Payannur, Kannur, Kerala
111.	Sudheer Neeleswaram, Kasaragod Prakrithi Samrakshana Samithi, Thaikadapuram, Kasaragod, Kerala
112.	Joy Daniel, Institute for Integrated Rural Development, Aurangabad, Maharashtra.
113.	Dr Sarada Money, Social Scientist, Thiruvananthapuram, Kerala
114.	T J Babychan, Organic Bazaar, Thiruvananthapuram, Kerala
115.	Chittatinkara Krishna Pillai Vaidhyar, Vaidhyakalanidhi, Thiruvananthapuram, Kerala
116.	Dr A Latha, River Research Centre, Thrissur, Kerala
117.	Dr A Bijukumar, Reader, University of Kerala, Thiruvananthapuram, Kerala
118.	Geo Jose, National Alliance for People's Movement, Kochi, Kerala
119.	Hariharan, Secretary, Kissan Jyothi Farmers Club, Vaduvanchal, Wyanad, Kerala
120.	K Gangadharan, President, Wyanad Paddy Collective, Wyanad, Kerala
121.	N Badushah, Wyanad Environmental Protection Council, Naiketti, Wyanad, Kerala
122.	Pandiode Prabhakara, National Farmers Protection Committee, Palakkad, Kerala
123.	John Master, Vasundhra Organic Farmers Club, Sulthan Battery, Wyanad, Kerala
124.	Pradeep, Harithasena, Kuttiadi, Kozhikode, Kerala
125.	C Raju, National Agriculturists' Awareness Movement, Nagercoil, Tamil Nadu
126.	P Kumaresan, Human Rights Sangamam of India, Nagercoil, Tamil Nadu
127.	Gouthaman, South India Rice Trading Company, Nagercoil, Tamil Nadu
128.	Palraj, Agricultural Products Producers & Traders Association [APPTA], Kanyakumari, Tamil Nadu
129.	Jonsan, Human Rights Protection of India, Nagercoil, Tamil Nadu

130	G Kannan, Centre for Consumer Care, Viruthunagar, Tamil Nadu
131	K M R Karthikayan, Secretary, Pulses Manufacturers' Association, Viruthunagar, Tamil Nadu
132	C Backiya Lekshmi, General Secretary, Federation of Consumer Organisations of Tamil Nadu and Pondicherry [FEDCOT], Madurai, Tamil Nadu
133	Dr R S Lal Mohan, Nature Conservation Trust, Nagercoil, Tamil Nadu
134	Prof S Peer Mohammed, Federation of Consumer Councils of Kanya Kumari District, Tamil Nadu
135	S R Sreeram, Consumer-Human Rights Protection Association, Nagercoil, Tamil Nadu
136	Dr K Swarnalatha and Dr Jasmine Asir, Nagercoil Women's Consumer Protection Centre, Nagercoil, Tamil Nadu
137	Nandita Shah and Deepak Suchde, Sharan, Mumbai
138	Mohan Rao, Manukonda Development Professional, Hyderabad, Andhra Pradesh
139	Dr V Rukmini Rao, Gramya Resource Centre for Women, Hyderabad, Andhra Pradesh
140	Deepa Rose, KHPT, Dharwad, Karnataka
141	C B Ramkumar, "Our Native Village" Eco-resort, Karnataka
142	Suresh Dewan, Gram Seva Samiti, Hoshangabad, Madhya Pradesh
143	Subrat Kumar Sahu, Film maker, New Delhi
144	Janagiraman, Concerned citizen, Chennai, Tamil Nadu
145	Anant and Sandhya Phadke, concerned citizens, Pune, Maharashtra
146	Dr P Ram Mohan Rao, General Secretary, Jana Vignyana Vedika, Andhra Pradesh
147	Subhash Mehta, Devarao Shivaram Trust, Bangalore, Karnataka
148	Walter Mendoza, Centre for Education & Documentation, Mumbai, Maharashtra
149	Wangkhaerakpam Ramananda, Forum for Indigenous Perspectives & Action, Imphal, Manipur
150	Radha Holla, Breastfeeding Promotion Network of India, Delhi
151	Anshuman Das, Development Resource Communication & Services Centre, West Bengal
152	Debbeet Sarangi, Organic Farming Association of India Orissa Chapter, Bhubaneswar, Orissa
153	Ratnakar Sahoo, Organic farmer, Bolangir, Orissa
154	Shiba Prasad Sahoo, AHIMSA Club, Bargarh, Orissa
155	R Lingaiah, CROPS, Warangal, Andhra Pradesh
156	P Viswanadh, VIKASA, Visakhapatnam, Andhra Pradesh
157	Dr Manvir Gupta, Medical practitioner & President-IMA, Faridkot, Kotkapura, Punjab
158	Gaurav Sahai, KVM, Panchkula, Haryana
159	Ajay K Sharma, Director, Akiko Planet, Pathankot, Punjab
160	K Sukumaran, Lawyer, Gudalur, Tamil Nadu
161	Pankaj Jain, Environmental Justice Action Group, Chandigarh, Punjab
162	Sudarshan Juyal, concerned citizen, Mumbai
163	Radhika Kalia, Clinical Psychologist, Dr R N Cooper Municipal General Hospital, Mumbai, Maharashtra
164	Chandrasekhar, P V Srinivas & Ratna, Centre for Sustainable Agriculture, Hyderabad, Andhra Pradesh
165	Samantak Das, Concerned individual, Kolkatta, West Bengal
166	Ch Narendra, Forum for Human Rights, Hyderabad, Andhra Pradesh
167	R Ashok Kumar, Bombay Sarvodaya Mandal, Mumbai, Maharashtra
168	Dr Shambu Prasad, Xavier's Institute of Management, Bhubaneswar, Orissa
169	Dr Amar Singh Azad, Medical practitioner, KVM Punjab
170	Prem Chand, KRUSHI, Karimnagar, Andhra Pradesh
171	Medha Patkar, Narmada Bachao Andolan
172	Anjum Rajabali, Film Script writer and teacher, Mumbai, Maharashtra

173	Deepak Suchde, Krushi Teerth, Madhya Pradesh
174	Suma Josson, Film maker, Mumbai, Maharashtra
175	Prof T K Bose, West Bengal Agriculture Commission, Kolkatta, West Bengal
176	Prof R N Basu, West Bengal Agriculture Commission, Kolkatta, West Bengal
177	Prof D K Bagchi, West Bengal Agriculture Commission, Kolkatta, West Bengal
178	Prof N Mukherjee, West Bengal Agriculture Commission, Kolkatta, West Bengal
179	Dr Aniruddha Das, Assistant Secretary, Paschim Banga Vigyan Mancha, Kolkatta, West Bengal
180	Dr S G Kabra, Director-Legal Affairs & Medical Audit, SDM Hospital, Jaipur, Rajasthan
181	Priya Nagesh and Ramasubramaniam, Samanvaya and Anti-GMOs Working Committee of Organic Farming Association of India, Chennai, Tamil Nadu
182	Capt J Rama Rao, Forum for Sustainable Development, Hyderabad, Andhra Pradesh
183	Madhumita Dutta, Corporate Accountability Desk-The Other Media, Chennai, TN
184	Kanchi Kohli, Kalpavriksh, New Delhi
185	Sarampalli Malla Reddy, Andhra Pradesh Rythu Sangam, Hyderabad, Andhra Pradesh
186	Rahul Saxena, Lok Vigyan Kendra, Palampur, Himachal Pradesh
187	A Sankar, EMPOWER, Tuticorin, Tamil Nadu
188	Sukla Sen, Ecological Democracy, Mumbai, Maharashtra
189	Manohar Bhau Parchure and Col Vikram Bokey, Maharashtra Organic Farming Federation [MOFF], Pune, Maharashtra
190	Ashok Khosla, Development Alternatives, New Delhi