

COMMUNITY BASED FISHERIES MANAGEMENT

Institutional Options for Empowering Fisher Communities







Introduction

The Community Based Fisheries Management Project (CBFM-2) is the second phase of an action research project designed to establish whether the sustainable management of publicly owned and private water bodies can be carried out by community groups consisting largely of poor fishers. The first phase implemented by the Department of Fisheries, with the assistance of the WorldFish Center and supported by the Ford Foundation, demonstrated that the approach was possible in a limited number of water bodies. The second phase, with assistance from the DFID-UK, involved a much greater range of water bodies (target 120, final number 116) with a range of partners - the Department of Fisheries (DoF), the implementing NGOs, Banchte Shekha, BRAC, CARITAS, CNRS, CRED, GHARONI, Proshika, SDC, SHISUK, and the specialist NGOs, BELA for legal assistance and FemCom for media communications.

Institutional Arrangements

A wide range of institutional arrangements have been established under the project. Many of the project documents state that there are three main fisheries management approaches; fisher-led, community-led and women-led.

The definitions of the three approaches were:

1. Fisher-led Approach - Forming groups among the fishers for using each water body and then a committee or organisation representing these groups and taking management decisions in a participatory manner;
2. Community-led Approach - Participatory approach at the community level. Fishery managed by the community where participatory planning with different stakeholders is followed by forming a water body management committee according to the suggestions of all stakeholder categories;
3. Women-led Approach - Ensure participatory planning involving the whole community covering all stakeholders, with groups usually formed with women (in some cases, mixed groups with men and women), and the women's group members take a lead in resource management.

However these definitions fail to capture the full diversity of approaches adopted by project partners during implementation. By the end of the project, 10 different organisations had been involved in setting up community groups to manage CBFM-2 sites. These were three major national/international NGOs (BRAC, Proshika, CARITAS), a natural resources focused NGO (CNRS), a female focused NGO (Banchte Shekha), four small NGOs (CRED, SHISUK, SDC, GHARONI) and the Department of Fisheries (who established two groups without NGO assistance).

The Role of CBOs

The Community Based Organisations (CBOs) were the primary focus of project activities. As in CBFM-1, the concept was to establish groups who could manage and benefit from the management of the water bodies. Poor households were identified through a census and wealth ranking exercise which was carried out by the partner NGOs. If interested, these people were then invited to join the project. The group members then formed executive committees which were officially registered with either the Department of Co-operatives or the Department of Social Welfare of the Bangladesh government. The executive committees of the CBOs received training on administrative and financial management from the partner NGOs and set up bank accounts. At government owned water bodies (*jalmohals*) the CBOs were offered lease agreements from the Ministry of Land for 10 years, the maximum that is normally allowed for development projects. At private water bodies (mostly floodplain *beels*) and at most river sites (where leasing arrangements had been abolished in 1995) no formal tenure was arranged for the CBOs. However all CBOs were asked to sign a Memorandum of Agreement with the Department of Fisheries (DoF) which set out their respective responsibilities.

By June 2006, 130 CBOs had been established at 116 water bodies with 23,000 direct beneficiaries and around 135,000 wider project beneficiaries (including members of credit groups).



Diversity in NGO Approaches

Each of the implementing organisations (partner NGOs and DoF) brought their own slant to the way that they carried out project activities which started with the identification of direct beneficiaries. Table 1 shows the criteria for beneficiary selection used by the five implementing NGOs at project inception. The major national and international NGOs (BRAC, CARITAS, Proshika) had a strong focus on credit programmes and training. CNRS tended to stress the natural resource conservation aspects of the project and were keen to build community networks dealing with wider issues. Banchte Shekha looked at the project as an opportunity to demonstrate that poor women can be involved in a field-based activity such as fisheries management, and was very successful in achieving this, albeit in a Hindu dominated area. The smaller NGOs carried out fairly limited programmes dominated by credit and training activities - in the case of SHISUK, this was restricted to the promotion of particular community management model. The DoF sites demonstrated that it was possible to mobilise community groups without the involvement of NGOs.

The implementing organisations also had different approaches to the identification of and nomenclature for project beneficiaries, the formation of groups (group of fishers, community-wide groups, credit groups), the hierarchy of groups or committees (village, *beel*¹, watershed or upazila and district) and the degree and level of interaction with the Department of Fisheries. The project encouraged the development of cluster committees where representatives from a number of linked water bodies had a forum to discuss common problems. However these tended to only happen within groups supported by a particular NGO rather than between community groups supported by different NGOs. The project also organised regional networking meetings which led to the establishment of regional committees and might in the future lead to a national body representing community based fisheries groups.

¹ Lakes or depressions in the floodplain.

Table 1: Criteria for Selection of Direct Beneficiaries

Criteria	CNRS	CARITAS	Proshika	Banchte Shekha	BRAC
Fishing	Catch fish for their livelihood	Catch fish for part of their livelihood	Persons who physically catch fish for their livelihood	Catch fish for their livelihood or occasionally catch fish	Catch fish for their livelihood or occasionally catch fish
Land	Have less than 50 decimals of land including homestead in floodplains and up to 100 decimals of land excluding homestead in haor areas	Have less than 50 decimals of land including homestead	Have up to 100 decimals of land including homestead and cultivable land	Have less than 50 decimals of land including homestead	Have less than 50 decimals of land including homestead
Income	Have an annual income of less than Tk. 30,000 primarily from manual work	Have a monthly household income of less than Tk. 3000 (Annual Tk. 36,000)			Have an annual income of less than Tk. 10,000, primarily from manual work
Other criteria	Sell their labour for at least 100 days per year	Education level not higher than 10th grade. Not employed by GoB or NGO		Only female	

Water Body Variation

In addition to variations in approaches adopted by the partner NGOs, the project covered a range of different types of water bodies, usually classified as closed *beels*, open (or semi-closed) *beels*, floodplain *beels* and rivers. Although these names appear to refer just to the physical characteristics of the water bodies, each has implications for tenure and access that have profound impacts on how they will be managed and the expected level of benefits from them.





Closed Beels

Closed *beels* are usually managed as stocked fisheries, however under CBFM, this incorporates important factors contributing to their sustainability. The main change is that these are not completely fished out during the dry season. At the start of the monsoon, fingerlings are stocked into the *beel* and fishing is highly restricted while the fish grow. The community groups may allow a small amount of low intensity fishing after the banned period, typically using traps, hook and line or large mesh gill nets. This is usually reserved for group members or occasionally for subsistence fishers, however the main fishing activity is reserved for later in the year as the water level drops. Fishing in stocked *beels* is normally carried out as a group activity and the proceeds are routed through the *Beel* Management Committee (BMC), ensuring that there are sufficient funds to cover next year's main expenses, the lease for the water body due on or before 13th April (31st *Chaitro* - the end of the Bengali year) and the cost of fingerlings. Any excess revenue is distributed amongst the group members.

Closed *beels* are regarded as very valuable resources and most will have been under active management before the project. The transfer of fisheries access to a group of poor fishers under the CBFM will undoubtedly have upset the former leaseholders but for the new leaseholders, offers the potential of life transforming benefits which were well beyond their reach before the project.

Open Beels

In open or semi-closed *beels*, there is still a lease to be paid but fewer other costs. The main CBFM practices are the installation of sanctuaries (part of the *beel* which holds water through-out the year and where fishing is completely banned) and the observance of a closed season on fishing during the main fish breeding period, usually April-June. Community groups will also try to restrict the use of destructive fishing methods such as fine mesh or monofilament gill nets. Fishing activity is usually fairly widespread after the closed season with each fisher working for themselves and there are fewer opportunities for collective revenue generation for the group compared to the situation in closed *beels*. A common approach is to rely on periodic harvesting from brush piles (*katha*) in the water body. Other CBOs rely on regular contributions through the year from fishers or a last-minute collection before the lease is due.

In most open or semi-closed *beels*, poor fishers will be extremely happy to have gained access to a resource from which they were previously excluded but are unlikely to benefit to the same extent as fishers in closed *beels*. Any improvements in fisheries diversity and overall catches brought about through better management will tend to be counterbalanced by the possibility of increased fishing pressure after the closed period and the limited opportunities to collect revenue to pay the lease.

Many of these water bodies are integral parts of larger connected water systems so lend themselves to co-ordinated management systems between groups.

Lease or Lease-free

The most important factor is whether there is a lease to be paid to the Ministry of Land for access to the water body. All closed *beels*, nearly all open or semi-closed *beels* and a few river sites have government leases. Closed *beels* are valuable resources which usually attract the highest leases, however they also offer the prospect of substantial profits if managed as stocked fisheries. Open or semi-closed *beels* depend more on natural fish production although some have been stocked in CBFM-2.

All floodplain *beels*, sometimes referred to as private *beels* and most rivers have not been leased out by government in the recent past and are referred to as lease-free. However a fee may be paid to a private landowner in compensation for the use of the resource by the community groups. Although this means that the operating costs for a community group managing these resources will be lower than for leased water bodies, it also makes it more difficult for the community groups to establish clear tenure over the resource and very hard for them to exclude others.

Rivers

In most river sites, there is no lease, so costs are low, however it is also very difficult for the community groups to establish exclusive fishing rights and generate revenue. Again the main actions taken by community groups are to install sanctuaries, observe closed seasons and restrict the use of 'destructive fishing practices' such as small mesh gill nets. Fishers will continue to fish for themselves through-out the year. Harvesting from *kathas* (brush pile) may be used to generate revenue for the community groups.

The fishers in rivers were probably able to access the same water bodies before the project as they do now, so their main motivation for carrying out project activities is the expectation that they will result in an enhanced and more sustainable fishery. However rivers are connected to other water bodies and fish move around - the benefits are likely to be greater if many more communities manage their fishery in a similar way and conversely they will be unhappy if they are the only people who are carrying out these actions.

Floodplain Beels

In floodplain *beels*, often referred to as private *beels*, there is no lease and the extent of the water body is extremely variable. Typically, all but a few ditches or excavated ponds dry up during the dry season whereas only elevated roads, embankments and homesteads remain above the flood level during the monsoon. Community groups in these areas have established sanctuaries, however they may have to be excavated in order to hold water through the year. The groups will also try to enforce a banned fishing period and control destructive fishing practices.

Expectations of benefits are similar to those in rivers but any gains in fisheries are likely to be spread very thinly. Community groups have the responsibility of looking after sanctuaries which will hopefully mean that there are starter populations of fish at the onset of the flooding period, however these are likely to move far and wide as the water level rises and watercourses re-connect. Typical floodplain dwellers have a strongly seasonal pattern to their lives, farming in the dry season and fishing in the monsoon. There are few full-time fishers but everyone fishes when the land is flooded making it very hard to control fishing pressure.

Unusual Floodplain Systems

In addition to 'normal' floodplain systems the project includes two unusual floodplain systems which are managed quite differently.

The community groups organised by the NGO Banchte Shekha around Narail in south-west Bangladesh have been established as women-led fisheries. Banchte Shekha concentrates on women's issues and saw the project as an opportunity for empowerment. This means that, unlike most floodplain fisheries, there has been a clear change in access - women who didn't have access to fisheries resources have now become involved in fisheries activities.

The other exceptional situation is in the communities organised by the NGO, SHISUK in Daudkandi, near Comilla. SHISUK has developed an approach which has been described as floodplain aquaculture because it involves the enclosure of floodplain areas using bunds followed by stocking with fingerlings, fertilisation and feeding. This has been replicated by several others in the area, however the SHISUK model has a unique approach to community ownership and involvement which deserves further consideration. Ownership of the fishery is organised as a joint stock company with most of the shares allocated for land-owners and SHISUK, however some of the shares are also made available to landless or poor households. The involvement of a wide range of stakeholders is in contrast to other CBFM interventions where only poor households are involved. The benefits to this approach are said by SHISUK to revolve around the interaction between the better off and the poor and between people from adjacent villages who had no point of interaction in the past. Many have criticised the project for its potential impact on free movement of water and aquatic organisms across floodplains. However its benefits in terms of fisheries production are clear, and if implemented in the SHISUK way, offers clear benefits to livelihoods.



Credit and Revolving Funds

The project provided two different sources of financial assistance to community groups; micro-credit to make it easier for individual households to respect fishing restrictions and micro-credit to help CBOs with their start-up costs such as pay their lease in the first year of operation and initial stocking costs (Table 2).

Micro-credit for households was mediated through the NGOs and followed their own protocols in terms of repayment periods and whether there was - individual or group lending.

Micro-credit for CBOs was also disbursed by the NGOs, however these were one-off payments with no need for repayment to the NGO. For example, the NGO would deposit the first year's lease fee for a water body at the DC's office. However in subsequent years it was the responsibility of the BMC to pay the lease with the NGO taking no further interest. The intention was that each BMC would build up capital through group activities which would be sufficient to pay the lease due before the start of the Bengali year (14 April).

Table 2: Credit Disbursement in CBFM-2

Partner NGO	Micro-credit for Individuals (Tk)*	Micro-credit for Groups (Tk)**
Proshika	4,450,000	3,050,000
BRAC	4,000,000	2,800,272
Banchte Shekha	2,000,000	215,000
CNRS	2,200,000	799,377
CARITAS	2,100,000	2,761,480
CRED	600,000	62,974
GHARONI	0	0
SDC	0	448,052
SHISUK	0	132,000
Total	15,350,000	10,269,155

* Used for alternative income generation for households

** Used for start-up costs for CBOs (lease payment, stocking costs in first year)

Physical Works

Project funds were used to build community centres, many complete with furniture, tube wells and latrines, at the majority of the sites. The aim was to provide meeting points for the CBOs that could also be used for other community uses. Other capital expenditure was on earthworks in the water bodies, either for the excavation of sanctuaries or digging out silted-up channels to reconnect water bodies to rivers, canals or other water bodies. Funds for physical works were either routed through NGOs or the DoF.



Comparing NGO Approaches

It is not possible to come to firm conclusions about which NGO approach was best because of the inherent variability of water bodies, community groups and the NGOs' priorities.

At a subjective level, WorldFish Center field workers, people who have worked with the NGOs throughout project implementation, were asked to rate the strengths and weaknesses of the implementing agencies using twenty factors ranging from the quality of staff, to their ability to organise access to water bodies and their organisation of training activities for CBOs. The NGO which was rated highest was Banchte Shekha followed by CNRS and SHISUK. The implementing organisations which were rated lowest were the Department of Fisheries, GHARONI and SDC. However these were all late additions to the implementation programme.

According to the field workers, Banchte Shekha was particularly strong in the use of the CBO community centres and are likely to be interested in supporting CBFM approaches in the longer-term. However they were also rated highly for their training, micro-credit, staff quality and conflict resolution. BRAC were commended for their likely commitment to CBFM in the future and for organising access rights to the water bodies.

CARITAS were stronger on staff quality and linkages to local DoF and local elites. CNRS were highly rated for their staff quality, for conflict resolution, for habitat restoration and for linkages to DoF, the local administration and local elites. They received low scores² for micro-credit and IGA training. CRED were stronger on micro-credit, conflict resolution, organising access rights, habitat restoration and savings collection by the CBOs.

GHARONI received relatively low ratings overall. Proshika were commended for their likely commitment to CBFM, their partnership approach, for organising access rights and for linkages to DoF, local administrations and local elites. SDC had a very high rating for organising access rights but low ratings for other factors. SHISUK had very high scores for post project involvement and organising access while DoF were commended for organising access rights to the water bodies.

2. Although the field workers gave CNRS a low score for micro-credit, this probably reflects the fact that CNRS, as an organisation, has less experience in managing micro-credit than many of the other pNGOs. Their micro-credit approach has been developed specifically for the project and according to a recent assessment (Alamgir, D.A.H, Strategy Development for Project Management of Microfinance Activities/Funds in CBFM-2 and CBFM-SSEA Projects. 2006) has been recognised as one of the best CBFM-2 micro-credit programmes.

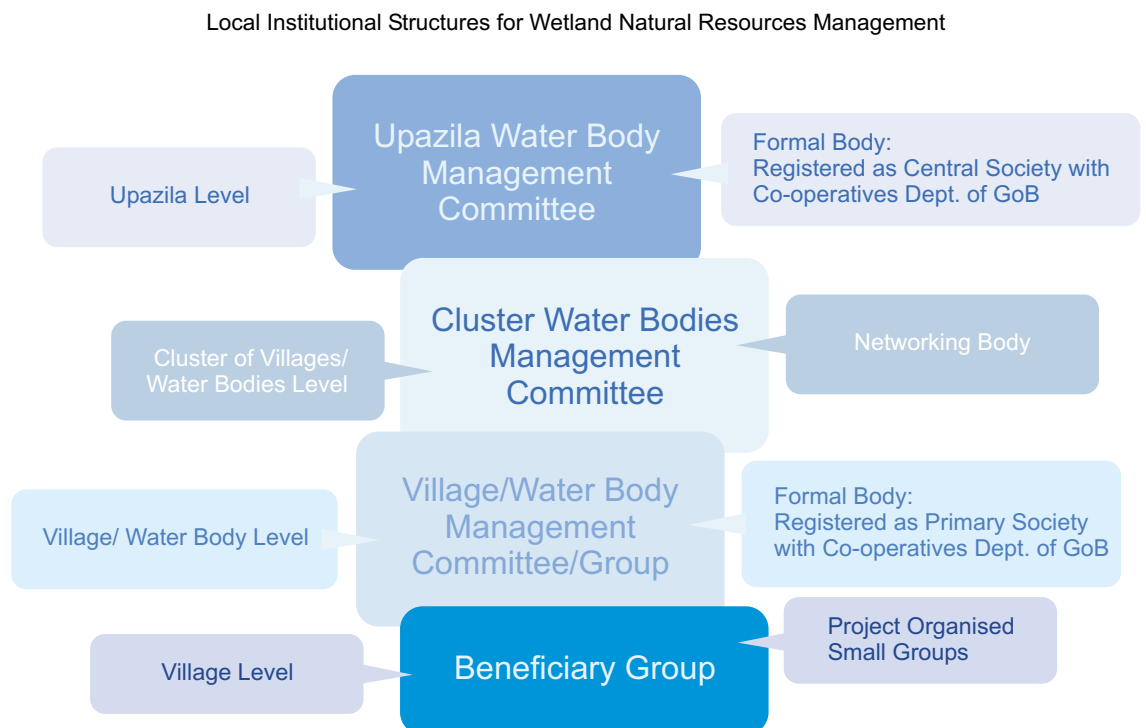
CBO Networking

While the main tasks of NGOs were to establish the CBOs and to support them through training and credit, most of the NGOs made active efforts to link CBOs together and to other stakeholders through committees, networks and clusters. The picture is confusing because each NGO developed their own system with their own terminology according to the needs of the community, the nature of the water body and the norms of the NGO.

CNRS developed a complex system with at least four tiers - Village Committees (for floodplain *beels*), Fishers Groups (for *jalmohals*), *Beel* or River Management Committees (managing the complete water bodies), Cluster Committees (managing a series of water bodies) and Apex Committees (co-ordinating management with other groups of water bodies, often at the upazila level).



Figure 3: CNRS Networking Arrangements



Exit Strategy

The intention was always to establish fully functioning, independent CBOs who could continue to manage their water bodies for many years to come after the end of the project. For much of the project they received day-to-day support from the partner NGOs and DoF however the plan was to withdraw financial and logistical support by the end of year five.

A CBO monitoring scheme was developed by the WorldFish Center to assess the preparedness of CBOs for independent operation. This was tested on the 14 CBOs established under CBFM-1 that continued to receive NGO support until mid-2005. Figure 4 shows the overall status of the 130 CBFM-2 CBOs at the end of 2005 and their anticipated position in August 2006 (original end of project) and March 2007 (end of project after 7 month extension). The CBOs in the upper two grades, a and b, are considered to be ready to operate on their own and once they reach these grades, are scheduled for release from project support. As can be seen from figure 4, over 80% of CBOs should be capable of reaching this point by the end of project (March 2007).

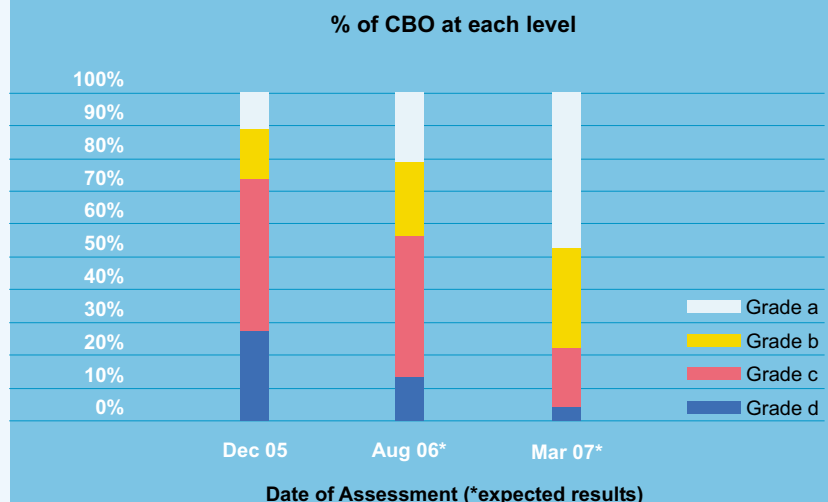
Proshika formed groups who were then represented on *Jalmohal* Management Committees and Sub-Committees and Advisory Committees. BRAC and CARITAS placed less emphasis on committees only organising *Beel* or River Management Committees.

CRED had a three tier approach with *Beel* or River Management Committees, Advisory Committees (involving more stakeholders) and Cluster Committees. Banchte Shekha, SHISUK, SDC and GHARONI had single tier management committees.

It is unclear how many of these committees actually met on a regular basis or had clear reasons for meeting. BMCs and RMCs were also involved in DoF and local authority meetings at the union, upazila and district level.

In addition, the project, through the Department of Fisheries, organised Regional Networking Meetings for all CBOs.

Figure 4: CBO Assessment



Of course reaching this "graduation point" does not mean that all support will be withdrawn. The CBOs will continue to receive support from the DoF, who are obliged to provide legal, administrative, training and fisheries management support under their MoA, and NGOs may continue to support CBOs through credit if it suits both parties.

LESSONS LEARNT



Paying Leases

The amount of lease due at each site varied enormously across the project, from around Tk. 700,000 to Tk. 5000 (US\$ 10,000 to 70). The management model for closed *beels* is clear and it should be possible for BMCs to raise enough funds through group activities to pay their water body leases. On the other hand, the situation in open *beels* is much more uncertain. Unless the BMC is very well organised, most fishing is carried out by individuals and there will be reluctance to contribute towards the lease. The opportunities for collective fishing are limited. The biggest danger is in year two of project activities as the first year's lease has been paid from project funds. BMCs in open *beel* sites need to focus very clearly on income generation otherwise they will very quickly find themselves in arrears which will inevitably result in claims of mis-management.



Lease-free Water Bodies

The expectation in floodplain *beels* and riverine sites is that CBFM-2 interventions will result in an improvement in fisheries. The WorldFish catch monitoring research programme has demonstrated higher production rates and increasing biodiversity at most sites, however the gains are modest. This will be a long-term process and in open sites such as floodplains and rivers will depend on what is happening in other surrounding water bodies. Once the limited extent of immediate fisheries benefits becomes apparent and with no real change in tenure, will the long-term gains be sufficient to hold the community groups and committees together?



Adjacent Water Bodies

Many of the CBFM-2 interventions (sanctuaries, closed seasons, gear restrictions, reconnecting water bodies through excavating channels) are designed to bring about long-term improvements to fisheries biodiversity and catches, however the result will depend on what happens in adjacent water bodies. Groups will soon become disenchanted if they think their actions are benefiting others with little immediate gain to them. It makes sense to link CBFM groups together but this needs to be thought through on a water body catchment basis. For example, in Hakaluki Haor seven water bodies are managed by project CBOs however there are over 200 water bodies which connect into a flooded area of up to 100 km² during the monsoon. In the south-west, community groups on the Fatki River have carried out community motivation activities in surrounding areas and have been successful in convincing non-project communities to install sanctuaries.

Credit, Community Centres and Physical Works

The level of project credit assistance was quite modest, and its clear intention was to generate alternative livelihood opportunities for fishers. Nevertheless, at many project sites, the credit programme seems to have generated much wider interest than the fisheries programme. Perhaps it is because the project resulted in a high degree of interaction between the CBOs and partner NGOs, many of whom concentrate on development through credit assistance. This meant that a wide range of credit-based activities were established under the project name: project funded micro-credit to individual households, NGO credit groups and many self-help credit groups where members contribute a set amount each week and can then borrow at times of hardship. This makes it very difficult to assess the effectiveness of credit disbursed by the project but clearly demonstrates its catalytic impact.

Similarly, the necessity for project community centres could be questioned, however they are tangible assets that support the status of project CBOs and should help their sustainability. As well as their obvious role in improving the sustainability of fisheries, sanctuaries appear to act as a strongly visible reminder to the group and the rest of the community that something is actually happening. The excavation of channels and deeper parts of water bodies is less visible but should provide long-lasting fisheries impacts if they have been properly planned.

CBO Sustainability

The major challenge which faces any project, operating in complex rural societies, is ensuring that the key institutions, in this case the CBOs, are truly sustainable. There are many examples of failure, where CBOs soon collapse once project support is discontinued or the original pro-poor aims of CBOs are overtaken by local politics.

In the case of CBFM-2 there are probably three main dangers - firstly that the rewards from community management are too few, secondly that the rewards are too great and thirdly the tremendous pressure on wetlands from agriculture development.

Clearly if the rewards from project involvement do not meet the expectations of CBO members, their motivation for continuing to carry out 'good deeds' such as observing fishing closed seasons and maintaining sanctuaries will decline. This is a real danger in river and floodplain sites where any gains are going to be long-term and shared with others. During the project life-time the group members have benefited from micro-credit schemes and day-to-day assistance from the partner NGOs, and although they may show strong support for the CBFM principles, these will be tested once the motivational influence of the partner NGO is withdrawn. Results from fisheries monitoring show that some of the smaller sites are generating very few returns from fishing - it is hard to see how these CBOs can continue on a long-term basis without further incentive-based support. This will also apply in open *beel* sites, particularly those with a high lease value but few opportunities for revenue generation for the CBO executive committee, usually the BMC. If the BMC cannot raise enough capital to pay the lease, they will doubtless be accused of financial mis-management by their group members or other stakeholders.

The second danger is that the proceeds from CBO membership are too lucrative to escape the attention of local influentials. The CBO will then be under constant pressure to include these people as members, or they will try to bring down the CBO through court action so that water body tenure reverts to the non-project system of lease allocation through auctioning. This is more of a danger at closed *beel* sites where the potential rewards can be substantial.

The third danger comes from the inevitable conflict which arises at many sites between landowners and fishers. The extent of water bodies varies with the season and many water bodies have become silted up. In many cases, farmers stake their claim to a piece of land by planting rice on it, even though it is officially within the fishery leased to the CBO. This can quickly escalate from a local dispute to a court case which might take years to resolve. This highlights the importance of proper demarcation of sites, however this is not simple in shallow *beels* where the extent of the water body varies through the year. Fortunately, CBOs have been able to continue managing fisheries despite such disputes, however the long-term sustainability must be in question.

Despite these dangers, experience from CBFM-1 sites suggests that the prospects for CBO sustainability may be better than expected. Of the 19 sites developed under CBFM-1 (6 closed *beel*, 3 open *beel* and 10 river sites), 15 sites continued to be managed by CBOs through the almost two year time gap between CBFM-1 and CBFM-2. The sites which dropped out during CBFM-1 were two closed *beel* sites where there was external pressure from locally powerful groups and two river sites where participation by fishers seemed to be the main problem. The remaining 15 sites were picked up in the second phase, when one other river site was dropped, again due to lack of interest by fishers. These 14 sites were all released from the project in mid-to-late 2005 and have continued to operate successfully.

Sustainability of CBO Networking

While the range of NGO-mediated and project-mediated networking committees established under the project make for an interesting study in institutional approaches, and have contributed greatly towards solving local problems during project start-up and implementation, there is a grave risk that very few of the networking structures will be sustained once project support ends.

Experience to date shows that local level committees, such as the Cluster and Apex Committees established by CNRS and Proshika have made the greatest contribution towards problem solving for CBOs as they had sufficient standing to be able to air problems faced by individual CBOs to the key power brokers at the upazila and district level. These committees will almost certainly terminate once NGO support is withdrawn from CBOs but should be replaced with local level networking initiatives. Regional and National Networking Committees can also make a valuable contribution and probably stand a good chance of being supported by the DoF once project funding closes, but both levels of networking are needed.

The development of sustainable networking arrangements is a priority for the remainder of the CBFM-2 project, linking not only CBOs established under this project but CBOs involved in similar activities in the same watersheds, areas, regions and nationally.



Source of Information

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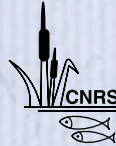
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