

Draft National Tourism Policy, 2015: A Mockery of Democracy

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Tourism is not just a holiday, it changes the entire social, cultural and economic nature of the place where it thrives. There are social costs: abuse of women, children particularly those forced into sex work, trafficking and child labour because of tourism. Ministry of tourism announced Draft National Tourism Policy of India in May 2015 and given only 10 day for public comments. The draft NTP 2015 echoes much of BJP's position on tourism since 1998. While it is the prerogative of the elected governments to form policy based on its promises as articulated in its manifestos and other documents, it is equally important to ensure that the process of policy formulation in the country is transparent and democratically decided. For tourism, the only directive giving document is the National Tourism Policy. Therefore, we believe that this document needs to be given the same consideration as the passing of any legislation and therefore brought to the Parliament for a discussion and a wider consensus. The government's attempt to scuttle this process by introducing it in the Cabinet is a manifestation of its autocratic nature which will affect millions of people whose homes have been turned into products to be traded in the tourism market.

Government's Envisioning of Tourism Development

The Indian Government created the Department of Tourism in 1958, which then became a Ministry, a couple of decades later. The 1st tourism policy was announced by the Government of India in 1982 followed by the National Action Plan for Tourism in 1992. A major shift in focus was experienced with the announcement of the 2nd National Tourism Policy by the NDA Government led by Bharatiya Janata Party (BJP) in 2002, wherein tourism was considered a national priority to enhance the socio-economic status of the country with emphasis on the creation of tourism related jobs, enterprises, infrastructure development and foreign exchange.

A departure in outlook of the Ministry of Tourism was during the 2nd Conference of Tourism Ministers which was held in New Delhi in August 2014 and chaired by the then Union Minister for Tourism, Shripad Yesso Naik. A resolution was adopted among which were 1. that all States and Union Territories (UTs) will develop tourism destinations keeping in view the principles of carrying capacity and sustainability, 2. that they will adopt the Sustainable Tourism Criteria for India (STCI) developed by the MoT for developing tourism in a responsible manner and 3. that the Departments of Tourism (DoT) of all States and UTs will endeavour to promote responsible tourism by ensuring the increased involvement of local communities both at District and Panchayat levels.

However, one and a half years down the line, these resolutions seem to have only been words spoken but not with an intent to act upon. On the ground, the focus of the MoT continues to be on infrastructure development, marketing and promotion, skill building and on the safety of tourist (though very little consideration is given to the threats faced by the local communities from tourists). Even mechanisms such as the STCI which was expanded to include Beaches, Backwaters, Lakes and Rivers in August 2014 and the Safe and Honourable Tourism Code (S&H Code) remain as mere tools, brandished every time the Government is questioned about community involvement or on issues of sustainability. Even prior to initiating the formulation of the National Tourism Policy 2015, one of the first schemes that was announced by the new government was the National Mission on Pilgrimage Rejuvenation and Spiritual Augmentation Drive (PRASAD), followed a few months later by Swadesh Darshan.

PRASAD as a scheme while it was introduced in 2014, the BJP party had already envisioned such a programme in the form of the 'Pilgrimage Tourism Development Fund' as mentioned in their 2004 manifesto. It was envisaged that this fund would be used to improve infrastructure, amenities, and cleanliness standards at 100 important centers of pilgrimage across the country in the next five years. What might have changed since then is that in 2004, a user fee to the pilgrims was seen as a way of raising resources for this fund, while in 2014 Public Private Partnerships (PPP) are seen as the vehicle for the promotion of pilgrim tourism in the country. Many state tourism departments have followed suit and are looking at the PPP model to restore and adopt historical and cultural assets into tourism products in Karnataka, Kerala, Madhya Pradesh, Himachal Pradesh, Rajasthan and Andhra Pradesh.

In their 2004 manifesto, there was a clear message that tourism is one of the tools for development, when it featured in NDA's strategy for economic development and employment generation¹. The manifesto also committed to initiating the promotion of tourism within the first 6 months, if it was elected to power. The parallel here, is that within the first

1 Draft National Tourism Policy, 2015: A Mockery of Democracy, EQUATIONS, March 2016

6 months of the party coming to power in 2014, both PRASAD and Swadesh Darshan schemes were announced, bringing the 2004 vision to fruition.

Among other elements of the action plan which were proposed in the 2004 manifesto are the following, which we believe are critical and being acted upon today:

"...One of its important milestones would be to increase foreign tourist arrivals from 30 lakh now to 1 crore by 2009, and 2 crore tourists by 2015..."

6) Integrated development of India's 6,000 km-long coastline through cruise and beach tourism.

7) The Coastal Regulation Zone (CRZ) provisions will be relaxed for tourism and critical urban development projects.

8) Rationalization and simplification of taxes; Tax holidays on large capital investments in tourism...

10) The North-East will be promoted in a special way to create new tourism destinations for foreign tourists..."

If we are to take a step back, the vision for tourism can be seen even in the current government's election manifesto of 1998 where they had placed importance to the tourism sector, with a separate section on its policy on tourism. While promotion, marketing and placing India on the global tourist map were some of the aspirations of the manifesto, other critical aspects of regulation were also raised. For e.g. the document clearly mentioned that a regulatory mechanism to avoid damage to the heritage and environment needs to be identified. Going a step further, the section on its policy on environment mentioned that tourism-related projects that would disturb the environment and cause degradation would not be passed. Further, the document discouraged high-end tourism and was in favour of tourism that is accessible to all². The party re-iterated its commitment to tourism, when it released its agenda for the Lok Sabha after it formed the NDA government in 1999, when it committed to update the National Action Plan on Tourism and to prioritise tourism development as a core activity³.

The BJP 2009 manifesto⁴ made clear linkages between tourism and employment generation. In the context of the North East region, it was suggested that tourism along with traditional skill-based industries would be given impetus. Tourism was also seen as a vehicle for development in the UTs. Specific plans for promoting tourism in the context of heritage and pilgrimage was also highlighted, through the proposal of tourism in the Ram Setu context.

While the previous documents did identify tourism as a vehicle of economic growth and offered a clear vision, it is the 2014 manifesto of the party which provides direction for the nature and form of tourism development. It does this by not only laying out the vision for tourism, but also highlighting inter-linkages between tourism and other sectors. It continues to stress on tourism development in the North East Region and in UTs and seeks cooperation between the states on security linked and inter-state disputes, so as to promote tourism. Apart from the old perspective of seeing tourism as a tool to generate employment, develop infrastructure and enhance foreign exchange earnings, the 2014 manifesto hopes to develop tourism in a 'mission mode' by creating 50 circuits around themes like: a) Archaeological and Heritage, b) Cultural and Spiritual, c) Himalayan, d) Desert, e) Coastal, f) Medical (Ayurveda and Modern Medicine).

In the context of international relations, the 2014 document proposes to create Brand India with what it terms as the 5 Ts: Tradition, Talent, Tourism, Trade and Technology. In the context of tourism, the government has followed up on its plan and has constantly promoted India by liberalising its visa regime despite not having a policy on the same, and promoting India at various international platforms. It is important to note that the manifesto is also committed to, "Evolve a national policy for tourism to provide needed infrastructure such as hotels, transports and removal of bureaucratic impediments."

In January 2015, MoT announced the formulation of a new tourism policy by May 2015. During EQUATIONS engagement with the Ministry of Tourism prior to this announcement, when we asked about whether a new policy was going to be formulated, the Secretary shared that there was no need and we may only need to revise certain sections that needed to be updated. We however believe that the formulation of the new policy was an important initiative taken by MoT, especially given current trends and developments in tourism, which make the 2002 policy's relevance redundant. EQUATIONS had however hoped that the outcome would be a different one as we saw this as an opportunity for progressive thinking but even this policy is uninspiring as it has only taken forward the its old line thinking.

As part of the process of policy formulation MoT sought direct contribution from industry stakeholders and state governments. The key concerns by Civil Society Organisations (CSOs) is that the policy aims to centralize power by placing tourism in the Concurrent List thereby undermining the scope of any meaningful participation of the State Tourism institutions, District Councils and by the constitutionally mandated elected bodies like Panchayats and Municipalities. What is starkly lacking in the draft NTP 2015, is the acknowledgement of people whose homes and backyards are promoted as tourism destinations. The policy does not concern itself with the impacts of tourism on the people – their lives and livelihoods. Even within the tourism industry, it is the private and formal sector which has been kept in mind while formulating the draft Policy. The unorganised sector and casual workforce within the formal sector have been completely forgotten.

For these three groups of people (people in tourism destinations, the unorganised sector and the casual workforce), a constant struggle has been to have their voices heard not just in the formulation of this policy but on a regular basis while the big businesses within tourism have the ease of access and the ear of the Ministry at all times. Why does this differentiation exist? Why does the Ministry lack inclination to hear these voices? Do they consider them as a nuisance or a stakeholder that does not exist?

If we are to reflect back on the resolution, it was unanimously agreed upon that the Departments of Tourism of all States and UTs will endeavour to promote responsible tourism by ensuring the increased involvement of local communities both at District and Panchayat levels, however the Ministry of Tourism themselves seem to have forgotten to involve people in tourism destinations, the organised sector and the casual workforce), while drafting the NTP 2015.

The trend of formulating new tourism policies is also being mirrored at the state level so as to align with the central one. Between 2015-2016, 9 states came up with new state tourism policies, of which 5 (Rajasthan, Maharashtra, Gujarat, Jharkhand and Jammu & Kashmir) are states where BJP and its allies have formed government. To draw a parallel, both the draft NTP 2015 and the recent Jammu & Kashmir tourism policy, speaks about tourism contributing to economic and social well-being with a focus on responsible / sustainable growth in their vision statement. Similarly many state governments have announced a scheme for heritage tourism, which was also an area identified in the BJP manifesto.

Why Do We Need A Policy?

Close scrutiny reveals that the present government has already started implementing the commitments made in their manifesto though the crucial aspect of the finalisation of the National Tourism Policy remains unaddressed. In the current situation, the policy becomes a redundant tool, a matter that needs be rectified before further implementation of the schemes new schemes as well as new developments that are being planned.

Both schemes, PRASAD (pilgrim destinations) and Swadesh Darshan (theme based circuits), are based on the all integrated development models which are top-down in approach and have no space for the participation and decision making processes of the local self governing institutions (LSGIs).

Five key agencies are proposed to be set up that will plan, guide and monitor the implementation of these schemes – the National Steering Committee, Mission Directorate, Central Sanctioning and Monitoring Committee, Project Management Consultant and Implementing Agency. Except in the preparation of the detailed project reports, where the LSGIs will be consulted, there is no reference of them in any of the other processes. We believe that this undermines the constitutional role of the LSGIs, which is not limited only to consultations, but is one of self governance through participation and decision making.

Additionally, the schemes are also heavy on infrastructure development and are to be implemented in a PPP mode which is in and of itself a problem, as this will lead to large tracts of land being acquired and where the regulation is with para-statal bodies. The schemes speak about slum up-gradation, building of convention centres, golf courses, aquamarine parks, shoreline development of natural water bodies, among other developments. One fears if slum up-gradation might be the justification of beautification and cleanliness drives forcing / evicting communities out of view of the tourist. How does the large scale development of golf courses, conventions centres and themes parks, which are extremely resource intensive fit in with the idea of sustainable development?

Further, the schemes do not seem to be informed by feasibility / impact assessment studies of already on-going tourism in these areas. For e.g. in the case of coastal tourism circuit proposed by the Swadesh Darshan scheme, there is enough evidence that the coastal tourism destinations are reeling under social impacts such as drug abuse, abuse of children, child labour and women and serious environmental damage to coasts reducing the fish yield of the fisherfolk. Similar issues are prevalent in pilgrimage tourism destinations like Puri and Varanasi.

All aspects of the resolution that was adopted in the August 2014 meeting appears to be have been forgotten when these schemes were being drafted, announced and implemented.

Activities such as Campaign Clean India which was initiated in 2011 by MoT to be implemented at tourism places, was taken up and expanded in 2014 as Swachh Bharat Mission (SBM) to cover the entire country. However, one aspect that has been missing from the beginning in MoT's approach is addressing the issue of caste and caste dynamics which are embedded in structural realities of our society. Without addressing the caste system, a mere awareness of cleanliness of the tourism destinations is and will continue to remain highly insufficient.

Apart from the schemes, the other aspect that was established prior to the formulation of the draft NTP was the Inter-Ministerial Coordination Committee on Tourism, a representation from all relevant ministries to address issues of convergence and synergy. In a letter to MoT, in February 2015, EQUATIONS had urged MoT to open up the discussions and consider inviting other Ministries such as Ministry of Development of North eastern Region, Tribal Affairs, Urban Development, Rural Development, Human Resource Development, Labour and Employment, Micro, Small and Medium Enterprises, Panchayati Raj, Social Justice and Empowerment, Women and Child Development and Youth Affairs and Sports – as tourism by nature is inter-disciplinary and each of these Ministries apart from the ones that are part of the Committee has a connection and role in the process of tourism development. What is unfortunate is that neither the centre nor some of states (Rajasthan, Maharastra, Gujarat and Karnataka) where such committees have already been constituted, have considered the wider engagement of the other departments which is crucial.

Within the draft National Tourism Policy there were proposals to set up a many of Boards – National Tourism Advisory Board, National Heritage Tourism Board, Medical and Wellness Tourism Promotion Board, Yoga Promotion Board, MICE promotion Bureau, Beach Development Authority & Tourism Investment Promotion Board (last two at the state level). The 1st among them is the establishment of Medical and Wellness Tourism Promotion Board and the Central University on Tourism and Hospitality. It may be just a matter of time before the others follow suit, maybe even prior to the finalisation of the Policy. EQUATIONS had raised concerns regarding these in its submission to MoT.

With regard to the Medical and Wellness Tourism Promotion Board, we believe that this is the responsibility of the Ministry of AYUSH and along with the MoT, to arrive at a strategy for its promotion and practice. Currently, Ayurveda and Yoga centres abound the tourism destinations. Often in places it is neither the practice followed nor is it part of the world view of people living in these places, though it is being thrust among them. Primary health care centres are often dysfunctional and or not available to people in far flung areas. Lastly, given that resources used in traditional systems of medicine are already under threat due to loss of biodiversity across the country, and recognising that these are systems of medicine still accessed by people, tourism will further aggravate this situation by competing with the local communities for access to these resources.

The Ministry of Tourism in coordination with the Ministry of AYUSH should regulate the practices of the tourism industry – tour operators, accommodation units, spas and health and wellness centres – to ensure that tourism does not violate the ethics and practice of the traditional systems of medicine and that neither are the resources nor the practices inaccessible to local communities due to tourism. We fear that these have not been the key concerns when the Board was established.

The current education structure is based on the needs of the policy and the industry without taking into consideration other critical aspects in tourism, binding the student with limited knowledge and exposure. EQUATIONS in its submission had suggested that the university should offer and also encourage tourism teaching institutions – to review and update tourism courses which are multi-disciplinary in nature and reflective of the current trends and perspectives in tourism. Another critical aspect that needs to be dealt with in tourism curricula is on tourism ethics and sustainability.

Current Trends in Tourism Development

Infrastructure creation through modernisation of existing airports and the development of low-cost airports to promote air connectivity, particularly to remote areas, continues to be a priority for the new government, and such development will see increasing stakeholding of private players. 50 no-frills airports and 15 greenfield airports were announced as of September 2014 and is one of the important areas that received attention even in the budget allocations for 2016-2017. What went unheard are the voices of resistance of the local communities from various corners of the country – against the Pakyong Airport in Sikkim, the Aranmula International Airport in Kerala, the Bhogapura in Andhra Pradesh on grounds of land acquisition and land pooling and on rehabilitation and compensation issues. The rushed, unplanned manner in which the airports are being pushed, without proper consent from local communities and even environmental clearances, is symbolic of wanting to create more infrastructure in the name of development without considering other options.

The ecosystems of the coasts, forest, mountains, islands – which have been subjected to unplanned & unregulated development continue to bear the brunt of tourism as both the state and centre plan to focus their energies on these regions either through schemes like Swadesh Darshan, Sagarmala project among others. The Minister in charge of Shipping declared 700 uninhabited islands across India to be developed for tourism, film-making, entertainment activities, and as honeymoon destinations. A reflection of this is seen in the 2004 manifesto.

While the government mentions that before coming out with any such plan for the islands, they would consider the environmental and adverse impact on the vulnerable indigenous populations living in the nearby islands. However in reality we know that tourism development (infrastructure) will mostly probably take precedence over any of these considerations and might also choose to ignore learnings from other island states that have borne the brunt of tourism.

In January 2015, the Principal Bench of the National Green Tribunal (NGT) on a Public Interest Litigation (PIL) ordered, to immediately demolish all Khokas and Dhabas (sheds and eateries) which are unauthorised and illegal being carried on at Solang Nallah and to stop the plying of all vehicles from Manali to Rohtang which are 15 years old from the up-coming tourist season. While this move affected the livelihoods of thousands of peoples on the other hand, massive infrastructure projects like roads and ropeways have been given the green signal. In the garb of controlling vehicular pollution, NGT inadvertently and illegally allowed for the construction of a ropeway between Vashisht and Rohtang Pass for which no feasibility study had been conducted, much less an EIA. The intention of the state and the judiciary is clear. Big businesses will be supported at all costs and will ensure that minor impediments like the informal sector would be cleared out of the way.

The impacts are not just in the way tourism development is conceived but also in the constant and systematic dilution of legislation. Calamities continue to abound in the hills and mountains. From the floods in Kashmir to the accidents in Himachal Pradesh and Uttarakhand involving tourists, the precarious nature of this ecosystem has been re-affirmed and the need to retain strict environmental regulations has been felt. MoT in 2014 issued a tender to undertake a study on Tourism Carrying Capacity of Existing and Potential Destinations for Planning for Infrastructure Development in Uttarakhand, the study which is still awaited. This also seems to have been one of the only studies on carrying capacities that has been commissioned by MoT, while in the August 2014, it was resolved that tourism destinations will be developed keeping in view the principles of carrying capacity and sustainability. While there have been no overarching changes suggested on governance of the coasts, many of the coastal states have been pushing for dilution of the Coastal Regulation Zone (CRZ) guidelines from the 200 mts to 100 mts, so that tourism may flourish. It may not be long before amendments to this legislation are made, if we are to follow what was stated in 2004 manifesto.

The labour laws are being diluted to restrict the formation of unions, reduction of auditory gaze on establishments and relaxation on smaller enterprises from compliance to basic labour laws. State governments of Gujarat, Rajasthan and Madhya Pradesh have amended their labour laws to make them more industry friendly. In the tourism industry, the hospitality sector has high levels of contract labour and the rest of the workers of tourist areas are self-employed and hence outside the purview of almost all labour laws. In the light of such draconian changes in laws regarding regulation and dilution of rights to the workers, the labour in tourism stands in a very precarious position, and will have no space to be heard. Tourism is time bound and already an unregulated sector. The implications of these changes in labour laws would further contractual employment thus having a broader impact on social security. Additionally, the unorganised labour force in tourism is high. With the dilution of laws for even the organised sector, there is little hope for the protection of labour in the unorganised sector.

An area where MoT could have influenced the outcome is the Gujarat Tourism Policy, 2015, given the resolution they had taken in August 2014, "Departments of Tourism of all States and UTs will adopt the "Sustainable Tourism Criteria for India" developed by the MoT for developing tourism in a responsible manner". Gujarat announced its Tourism Policy in September 2015, wherein they have included the concept of the STCI but it is not within the larger approach & context of the policy but under the sub-section on the Environment – Friendliness, Sanitation and Cleanliness. Sustainability as a concept is much larger and cannot be equated with only the environment.

However regulation in and of tourism is not a key concern of MoT. In a discussion related to the draft NTP, 2015 between EQUATIONS and a senior official in the Ministry of Tourism, the official exclaimed "We only receive 0.6% of the international tourists (6.97 million) the need of the hour is development and promotion and not regulation". What of the 1145 million domestic tourists which are not taken into account in the calculations?

The idea of planning and regulation, more so will be ignored now as the focus will continue to be on infrastructure development, skill building and promotion if they wish to reach the foreign tourist numbers especially as the growth rate in foreign tourists arrivals decelerated from 10.2% to 4.5% in 2015, with the budget seeing only a marginal increase from 1483 cr last year to Rs 1500 cr and for India to maintain its 52nd position on a global list of countries in terms of their travel and tourism competitiveness.

Lastly, the Tourism Vision 2030 document was commissioned by the Experience India Society, a group of entrepreneurs from the tourism and hospitality industry, prepared by KPMG and launched by MoT. One can only imagine (also as it is unavailable in the public domain) the contents of this document which we believe would be heavily focussed on aspects that are of concern to the big businesses and the framework in which they conceptualise tourism while ignoring the workers within the formal sector and the unorganised sector in tourism as well as people living in and around destinations affected by tourism.

A Flawed Mandate:

The reason why these documents, whether it is the National Tourism Policy or the Tourism Vision are one-sided is because they follow the mandate as defined in the 2nd Schedule of the Government of India (Allocation of Business) Rules, 1961 which is flawed and myopic in its perspective. The last amendment to the 2nd Schedule for Ministry of Tourism was from an Order dated 1st June 2006^s, which details the Business of the Ministry of Tourism as follows:

1. Development and Promotion of Tourism
2. International Cooperation in the field of Tourism
3. India Tourism Development Corporation and Autonomous Institutes

By 2006, India had experienced the many negative fallouts of unplanned and unregulated tourism, the manifestations of some which are detailed here.

Tourism is not just a holiday, it changes the entire social, cultural and economic nature of the place where it thrives. Local economies become dependent on tourism, which like a weed slowly strangles traditional occupations like agriculture, fishing, pastoralism, arts and handicrafts. Land and beaches get taken over for construction of tourism infrastructure affecting farmers, adivasis and fishworkers. Pastoralists find their movement restricted due to tourism and are often forced to 'settle down' and become labour in the tourism industry. People who are dependent on natural resources like forests, coasts and grasslands often find themselves restricted, as tourism is developed without taking into consideration the carrying capacity of these regions. There are also high levels of contract labour and the rest of the workers of tourist areas are self-employed and hence outside the purview of almost all labour laws. Artisans are co-opted into the tourism industry and often forced to compromise on their art to deliver cheap souvenirs. The unorganised sector which according to various studies contributes 60-70 % in tourism industry, is often seen as being a nuisance, affecting the attraction of the destination and therefore marked as something that should be removed.

There are social costs: abuse of women, children particularly those forced into sex work, trafficking and child labour because of tourism. Current forms of tourism, systemically and systematically perpetuate the caste system, with sometimes even furthering caste based occupations especially those concerning dalits and adivasis. Further, the tourism industry needs to take a positive view of dalits and adivasis for e.g. recognition of their arts and handicrafts. Gender and sexuality stereotypes are also upheld – some examples being women dressed up at front desks of hotels

and transgender communities having no other option other than sex work and begging in tourism destinations. Therefore tourism not only maintains but furthers social hierarchies.

Crux of the problem lies in the non-acknowledgement and the lack on intent by the Ministry of Tourism to act upon these issues. The MoT needs to believe that these are genuine and real time issues, that needs to be given due consideration and find an equal balance in terms of resources within MoT which currently is used only towards the development and promotion of tourism in India. The change needs to be brought in at the top most level, otherwise a flawed mandate will only result in a flawed policy.

We Demand:

1. A change in the mandate of the Ministry of Tourism to reflected in the 2nd Schedule of the Government of India (Allocation of Business) encompassing the multi-dimensional and complex nature of tourism development. Its core purpose should be to ensure that tourism policy, planning, coordination and regulation of tourism development needs is based on research and ground realities, privileging local community benefits and local economic growth.

2. The draft NTP 2015 echoes much of BJP's position on tourism since 1998. While it is the prerogative of the elected governments to form policy based on its promises as articulated in its manifestos and other documents, it is equally important to ensure that the process of policy formulation in the country is transparent and democratically decided. For tourism, the only directive giving document is the National Tourism Policy. Therefore, we believe that this document needs to be given the same consideration as the passing of any legislation and therefore brought to the Parliament for a discussion and a wider consensus. The government's attempt to scuttle this process by introducing it in the Cabinet is a manifestation of its autocratic nature which will affect millions of people whose homes have been turned into products to be traded in the tourism market.

End Note:

- 1 www.bjp.org/en/documents/manifesto/nda-agenda-for-development-good-governance-and-peace (accessed in March 2016)
- 2 www.bjp.org/documents/manifesto/bjp-election-manifesto-1998/chapter-4 (accessed in March 2016)
- 3 www.bjp.org/en/documents/manifesto/nda-agenda-for-a-proud-prosperous-india-lok-sabha-1999 (accessed in March 2016)
- 4 www.bjp.org/en/documents/manifesto/manifesto-lok-sabha-election-2009 (accessed in March 2016)
- 5 www.cabsec.nic.in/showpdf.php?type=allocation_aob_a286&special (accessed in March 2016)