



DAKSHINBANGA MATSYAJIBI FORUM (DMF)

Trade Union Regn. No.20474/92. Affiliated to National Fishworkers' Forum (NFF)

Head Office: 20/4, Sil Lane, Kolkata – 70015. Phone & FAX: 033-23283989 e-mail: dmfwestbengal@gmail.com

April 05, 2017

**Shri Rakesh Kumar Maurya,
Director,
Social Statistics Division,
Central Statistics Office, MoSPI
Wing-6, West Block-8,
R.K.Puram, New Delhi-110066.**

Sub: Inviting the comments / suggestions / modification on initial Draft National Indicator Framework for Sustainable Development Goals as prepared by MoSPI based on the inputs received from Ministries / Departments.

Sir,

Please refer to the communication resting with your Memo No. M-12012/3/2017-SSD-III dt.08.03.2017 on the subject mentioned above. Our comments / suggestions on the Draft National Indicator Framework are attached

Please note that we have confined our comments to **Goal 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development.**

In addition, we have commented very briefly regarding **inland fresh water resources** as the absence of the same in the Sustainable Development Goal Indicator framework prepared by you is a gross omission that fails the objective of the present exercise in a major way.

Attached please find some of our main comments that we could hurriedly compile in extremely short time.

With regards,

Pradip Chatterjee,
President
Dakshinbanga Matsyajibi Forum



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Comments on Global and National Indicators of SDGs

Goal 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development (M/o Earth Science)			
TARGET	GLOBAL INDICATORS	NATIONAL INDICATORS	DMF COMMENTS
14.1 By 2025, prevent and significantly reduce marine pollution of all kinds, in particular from land-based activities, including marine debris and nutrient pollution	14.1.1 Index of coastal eutrophication and floating plastic debris density	Health index of area of coastal water (percentage)	Presence of chemical contaminants in marine life, especially in fish should be an <i>indicator</i> .
14.2 By 2020, sustainably manage and protect marine and coastal ecosystems to avoid significant adverse impacts, including by strengthening their resilience, and take action for their restoration in order to achieve healthy and productive oceans	14.2.1 Proportion of national exclusive economic zones managed using ecosystem-based approaches	Percentage change in area under mangroves	Enactment of a Central Marine Fishing Regulation Act for the Indian EEZ that will follow the principles of sustainable fishing and provide preferential access to marine fish resources for small scale fishing communities should be an <i>indicator</i> . This act is to coordinate with state level Marine Fishing Regulation Acts for territorial waters.
14.3 Minimize and address the impacts of ocean acidification, including through enhanced scientific cooperation at all levels	14.3.1 Average marine acidity (pH) measured at agreed suite of representative sampling stations	Coral health index of Exclusive Environment Zone	
14.4 By 2020, effectively regulate harvesting and end overfishing, illegal, unreported and unregulated fishing and destructive fishing practices and implement science-based management plans, in order to restore fish stocks in the shortest time feasible, at least to levels that can produce maximum sustainable yield as determined by their biological characteristics	14.4.1 Proportion of fish stocks within biologically sustainable levels	The Indicator is being developed	Match fishing effort to available fish stock (sustainable yield). Follow principle of subsidiarity. Small and benign effort in fishing to be given preference against large and aggressive effort in fishing. Small scale fishing to have preferential access to fish stock over mechanized fishing. Destructive fishing gears like bottom trawlers, bull or pair trawlers, purse seines, fish finder devices and LED light fishing to be banned. These actions should be <i>indicators</i> .



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<p>14.5 By 2020, conserve at least 10 per cent of coastal and marine areas, consistent with national and international law and based on the best available scientific information</p>	<p>14.5.1 Coverage of protected areas in relation to marine areas</p>	<p>The Indicator is being developed</p>	<p>The target is dangerously wrong. Conserving at least 10% means allowance for destruction in rest 90%. We are against blanket ban on fishing in protected areas. Instead we demand that all our coastal and marine areas be protected with necessary norms for conservation agreed upon, adopted and governed by the small scale fishing communities who are by far the largest primary stakeholders and natural custodians of coastal and marine natural resources. These should be <i>indicators</i>.</p>
<p>14.6 By 2020, prohibit certain forms of fisheries subsidies which contribute to overcapacity and overfishing, eliminate subsidies that contribute to illegal, unreported and unregulated fishing and refrain from introducing new such subsidies, recognizing that appropriate and effective special and differential treatment for developing and least developed countries should be an integral part of the World Trade Organization fisheries subsidies negotiation</p>	<p>14.6.1 Progress by countries in the degree of implementation of international instruments aiming to combat illegal, unreported and unregulated fishing</p>	<p>The Indicator is being developed</p>	<p>Ban bottom trawlers, bull or pair trawlers, purse seines, fish finder devices and LED light fishing as these are highly destructive methods of fishing. Stop registration of new mechanized boats.</p> <p>If it is necessary to reduce the number of fishing boats to match fishing efforts to sustainably available fish stock, follow principle of subsidiarity. First reduce the number of large mechanized boats. Stop financing mechanized boats through loans and subsidies including fuel subsidies.</p> <p>These should be <i>indicators</i>.</p>
<p>14.7 By 2030, increase the economic benefits to small island developing States and least developed countries from the sustainable use of marine resources, including through sustainable management of fisheries, aquaculture and tourism</p>	<p>14.7.1 Sustainable fisheries as a percentage of GDP in small island developing States, least developed countries and all countries</p>	<p>The Indicator is being developed</p>	
<p>14.a Increase scientific knowledge, develop research</p>	<p>14.a.1 Proportion of total research budget allocated to</p>	<p>Allocation of budget resources for research</p>	<p>Small scale fishing communities to have</p>



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capacity and transfer marine technology, taking into account the Intergovernmental Oceanographic Commission Criteria and Guidelines on the Transfer of Marine Technology, in order to improve ocean health and to enhance the contribution of marine biodiversity to the development of developing countries, in particular small island developing States and least developed countries	research in the field of marine technology	as per the EEZ or coastline	governance rights to manage fisheries and all other activities that affect fishing. Enactment of necessary statutory instruments and their enforcement should be made indicators.
14.b Provide access for small - scale artisanal fishers to marine resources and markets	14.b.1 Progress by countries in the degree of application of a legal/regulatory/policy/institutional framework which recognizes and protects access rights for small-scale fisheries	The Indicator is being developed	Percentage share of small scale fishing to large scale mechanized fishing is suggested as an indicator of sustainability in fishing.
14.c Enhance the conservation and sustainable use of oceans and their resources by implementing international law as reflected in the United Nations Convention on the Law of the Sea, which provides the legal framework for the conservation and sustainable use of oceans and their resources, as recalled in paragraph 158 of “The future we want”	14.c.1 Number of countries making progress in ratifying, accepting and implementing through legal, policy and institutional frameworks, ocean-related instruments that implement international law, as reflected in the United Nation Convention on the Law of the Sea, for the conservation and sustainable use of the oceans and their resources	Percentage compliance of international laws	Compliance to International Conventions like FAO ‘Code of Conduct in Responsible Fishing’ and FAO ‘Voluntary Guidelines for Small Scale Fisheries’ should be made important additional indicators.



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Need for Sustainable Development Goal and Indicators on Inland Fresh Water Resources

It is unfortunate that inland fresh surface water resources along with fishing or fish resources and the small scale inland fishing communities that constitute the greatest non-consumptive use of fresh surface water, namely fishing, have failed to find a place either under the Target or under the Global or National indicators. This is a gross omission that fails the objective of the present exercise in a major way. It is

Ecologically fish is an indicator species for the health of water bodies – oceans, rivers, lakes, wetlands, ponds. Good fish needs good water.

In food security fisheries play a major role by providing cheap and good protein to the people.

As such sustainability and development of fisheries in inland waters should be considered as an important target and indicator of Sustainable Development Goals.

DMF urges upon the concerned authorities to make sustainable use and protection of inland fresh surface water resources including rivers, lakes, wetlands, ponds etc a separate and distinct Sustainable Development Goal with the following National Indicators -

Proper and adequate legislative and executive measures to protect the fresh surface water resources and their sustainable use that includes –

- i. Adoption of National Guidelines to restrict consumptive use of water from surface water bodies to sustain the ecological integrity and services of the water bodies;
- ii. State level legislative and executive measures to comply with and strict enforcement of the National Guidelines on consumptive use of water from surface water bodies.
- iii. Adoption of a National Policy on inland fisheries with guidelines to protect the water bodies with their sustainable use and confer tenure and governance rights to small scale fishing communities for fishing and fish farming in inland water bodies;
- iv. State level legislative and executive measures to comply with the National Policy on inland fisheries.

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