



DAKSHINBANGA MATSYAJIBI FORUM (DMF)

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

Head Office: 20/4, Sil Lane, Kolkata – 700015. Phone & FAX: 033-23283989 e-mail: dmfwestbengal@gmail.com

Date: 17th February, 2021

To:

Joint Secretary (Marine Fisheries and CVO),
Department of Fisheries,
Ministry of Fisheries, Animal Husbandry and Dairying,
Govt of India,
Krishi Bhavan,
New Delhi-110001,
India.

Sub: Submission of comments on the Draft National Fisheries Policy 2020 by Dakshinbanga Matsyajibi Forum (DMF)

Madam/Sir,
Greetings from Dakshinbanga Matsyajibi Forum (DMF).

Please find enclosed the comments of DMF on the Draft National Fisheries Policy 2020.

Sincerely,

Milan Das

Milan Das,
General Secretary,
Dakshinbanga Matsyajibi Forum.



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Comments on Draft National Fisheries Policy 2020

Dakshinbanga Matsyajibi Forum (DMF) welcomes the publication of the Draft National Fisheries Policy 2020 (NFP 2020) which has been long overdue.

DMF also welcomes publication of the Draft NFP 2020 in 11 languages of the country. We demanded that the draft should be published in all regional languages of the country.

DMF notes that the draft was uploaded on the Department's website on 15th January 2021 and comments were invited to be submitted by 30th January 2021 providing only 15 days' time for stakeholders' review of the 45-page document. This has been further extended to the 17th February 2021. This short period is tantamount to denial of the scope of review by the communities of small-scale fishers, fish farmers, fish vendors and allied workers, who constitute the great majority of primary stakeholders. **DMF demands extension of the date for submission of comments at least up to 15th April 2021.**

We are also utterly aggrieved to note that the Department of Fisheries, Government of India has taken **no effort to facilitate stakeholders' consultation on the Draft NFP 2020**. We take this opportunity to remind the Department of Fisheries under the Ministry of Fisheries, Animal Husbandry & Dairying, Government of India that their responsibility does not end with publication of the draft and calling for submission of comments on the same. As the Department of Fisheries, they have the responsibility to take their level best efforts to facilitate stakeholders' consultations on the new Draft NFP 2020. **DMF demands that the Department of Fisheries of Government of India should organise regional and State/UT level stakeholders' consultations on the new Draft NFP 2020 in collaboration with the Fisheries Departments of the States/UTs.**

Overview

DMF acknowledges that the instant Draft NFP 2020 is much more comprehensive than the earlier ones in dealing with various sectors and aspects of fisheries in India. It has identified many problems of different sectors and proposes to place fishers and fish-farmers at the core of the policy. However, there have been gaps in carrying forward this objective in dealing with various subjects like Blue Economy, infrastructure development, trade and governance etc. **In not recognising the centrality of small-scale fisheries, the policy falls short in dealing with the matters of sustainability, inequity and conflict within the fisheries sector.**

DMF welcomes the inclusion of climate change impacts, ecological decline of natural-resource base and the ways and means to address these. Though it appears that the climate change impacts have not been identified or addressed with reference to the whole of Indian fisheries, including inland fisheries. Furthermore, by continuing to place the fisheries sector under the umbrella of the Blue Economy framework, **the policy is unable to do justice to its commitment to stem the ecological decline.**



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DMF strongly asserts that the natural resources related to fisheries are common property assets protected by the Public Trust Doctrine. These assets cannot be privatised and should be utilised sustainably for the benefit of the society through the primary stakeholders like **fishers and fish-farmers**. The government has a role to ensure this. As such, all notions and practices of co-management of such resources should be based on the above principle.

Section-wise comments related to the Draft NFP 2020

A. Introductory Sections:

Introduction

DMF reiterates its long-standing position that the approach of small-scale and traditional fishers, fish-farmers and allied fish workers is not aligned with the extractive interests of the Blue Economy development framework. **Fisheries sector cannot be within the framework of 'Blue Economy' as long as the latter does not ensure the protection and promotion of the fisheries sector with its natural resource base that sustains 28 million fishers and fish farmers and many more ancillary workers.**

DMF demands that the policy's focus should start by mentioning the central role of small-scale fish workers as by far the largest primary non-consumptive stakeholders and natural custodians of the waterbodies of the country. In this regard, it has also failed to mention that small-scale fisheries are more traditional, more sustainable and more equitable. In view of this, DMF proposes the following inclusion:

"Role of small-scale fish workers in the fisheries sector of India is central since small-scale fish workers are by far the largest primary non-consumptive stakeholders and natural custodians of the waterbodies of the country. In addressing the challenges and prospects of the sector, it is important to recall that small-scale fisheries are more traditional, more sustainable and more equitable".

Mission

DMF highlights the crucial role played by the huge number of allied workers like fish sorters and dryers, fish vendors, net makers and repairers etc. majority of whom are women in sustaining the small-scale fisheries value chain. As such, it is vital that the mission of the policy also address the social and economic goals and well-being of allied fish workers.

B. Marine Fisheries:

The current draft proposes a shift of fishing effort to the deep-sea as a way to create the opportunity to rationalise fishing effort and sustain marine resources. **DMF is alarmed that the core problems relating to the marine fisheries sector have not been addressed in the policy.** DMF would like to highlight that for the small-scale and traditional fishers in the marine sector, the biggest threat to their livelihoods are the mechanised fishing vessels and the use of destructive fishing gears. This has directly resulted in the small-scale sector's share in marine fisheries declining



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steadily over the years, while at the same time comprising of the largest share of persons involved in fisheries work, at-sea and across the value chain. A result of this has been that the small-scale fishers have been pushed below the Poverty Line in many regions, thus, perpetuating their marginalisation in social and economic realms. **DMF demands that the policy begin by acknowledging the long-standing issues of inequity and unsustainability in the near-shore fishing sector.**

In order to do so, DMF proposes the use of the following principles:

1. **Matching effort to available stock:** In view of over-exploitation in near-shore areas (0-200 meters depth), effecting the realignment of different categories of fishing effort, namely non-motorised, motorised, mechanical;
2. **Preferential Access:** The small-scale non-motorised and motorised sector be given preference to access marine fish resources for their contribution to sustainability, equity and employment. This shall be put in place through a combination of the following measures:
 - a. Stopping the introduction of new mechanised fishing vessels and subsidies to existing mechanised fishing vessels;
 - b. Reducing existing over-capacity by applying the principle of scale subsidiarity, that is, first reducing the number and effort of the mechanised fleet;
 - c. Enhancing exclusive fishing areas for small-scale non-motorised and motorised fishing boats up to the territorial waters in general, and further on the basis of existing fishing areas accessed by them, with provisions for future expansion;
 - d. Introducing extended and staggered ban periods with 4 months ban for mechanised fishing, 3 months ban on motorised fishing with livelihood compensation and no ban on manual fishing, applying the principle of scale subsidiarity;
3. **Restricting Destructive Gears:** In view of the aggressive nature and the indiscriminate destruction to the natural stock caused by destructive fishing methods, put in place a regime of restrictions which include banning bottom trawling and purse seining, fishing with fish finders, LED lights and/or mosquito (zero) nets;
4. **Penalties for violations:** Penalties for violations of the regulations should also be implemented according to the principles of scale-subsidiarity which means that the scale of the penalty must be proportional to the effort and capacity of the fishing vessel.

Marine Protected Areas

DMF welcomes the draft proposal on providing legislative support for ensuring tenure rights of traditional fishers and for protecting their livelihoods in Marine Protected Areas. These guarantees and rights should be extended to Coastal Protected Areas like the Sunderbans and strengthened with the following measures:

1. Consultation with the small-scale fishing communities operating in the area and taking their informed consent as a mandatory measure in introduction of Coastal and Marine PAs;
2. Right of participation of the affected small-scale fishers in the management of the Coastal and Marine PAs.



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Co-management

While DMF welcomes the participatory or co-management proposed by the Draft NFP 2020, the reference made in the draft regarding examples set by Kerala, Tamil Nadu and Puducherry cannot be accepted without an elaboration and assessment of the policy frameworks underlying those. There are issues of side-lining small-scale fish workers from fisheries management.

Deep-sea fishing

DMF notes that private investments will be promoted in deep-sea fishing and processing to fully harness the potential of the marine fishery for inclusive development. Promotion of private investments is not conducive to promotion of artisanal/small-scale fishers in undertaking deep-sea fishing. DMF proposes that the space for development of capability of small-scale fishers to undertake deep-sea fishing must be well defined and protected against the interests of private investors. Furthermore, deep-sea fishing shall be approached by first addressing the near-shore conflicts as outlined in the section under 'Marine Fisheries' of our submission.

Monitoring, Control and Surveillance

DMF welcomes the need for better regulation in the marine fisheries sector. However, the MCS vision from the perspective of the small-scale fishers is as follows:

1. The experience regarding the existing MCS regime is that the small-scale fishers are continuously threatened and encroached upon by the mechanised sector and there is almost no administrative protection. As such, the MCS system must be directed primarily to protect the small-scale fisheries from the aggression and encroachment of the larger fishing vessels;
2. The Department of Fisheries on the coastal States/UTs, coastal Marine Police and the Indian Coast Guard should be adequately sensitised and equipped regarding the existing regulations and mechanisms to control fishing in the TW and the EEZ beyond it;
3. The Department of Fisheries on the coastal States/UTs and the Department of Fisheries of the Government of India should play the nodal role in the exercise of MCS mechanisms;
4. DMF is of the firm opinion that the assessment of Illegal, Unreported and Unregulated (IUU) fishing and measures to curb the same do not take into account the ground realities of the small-scale fishing sector in India:
 - a. The registration and licencing system, as well as the reporting of catch are yet to be fully operational in the small-scale fisheries sector;
 - b. Fishing is the livelihood and traditional right for most of the small-scale fishers. As such, they cannot be designated as being engaged in IUU fishing.

C. Inland Fisheries:

The experience of DMF with the inland fisheries sector is that the declined state of inland fisheries, particularly that of riverine fisheries, has been simultaneously accompanied by the decreasing accessibility of the small-scale fish farmers to waterbodies, including ponds and tanks. This makes it indispensable to have statutory measures to protect their access to the water and fish



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resources, as well as to protect those resources from encroachment, degradation and dispossession. DMF proposes enactment of 'Small-Scale Fishers and Fish Farmers Right to Waterbodies (Sustainable use and Protection) Act' that would guarantee the right of small-scale fishers and fish farmers to access and protect water and fish resources in inland water bodies including rivers, canals, reservoirs, estuaries, floodplain lakes, natural lakes and wetlands, tanks and ponds.

The **riverine fishers** are worst affected by external factors that has greatly reduced the fish resources in the Indian rivers. DMF welcomes the observation regarding displacement of riparian communities observed in the Draft NFP 2020. In order to stem the out-migration of communities, to stem their marginalisation and to restore the ecological health of rivers, DMP proposes that:

1. Immediate and effective steps to stop the use of harmful fishing gears and devices like mosquito nets, dynamite and electric fishing and poison;
2. Strict control over installation and operation of dams, barrages, dredging and inland waterways so that these do not adversely affect the movement and proliferation of fish species in the river waters;
3. That diversion of water for consumptive use from rivers should be controlled to maintain the ecological flow in order to ensure proper quality and quantity of water;
4. DMF additionally holds that the Draft NFP 2020 should propose empowerment and capacity-building of river-based fishing communities to manage the resources, as well as protection of their traditional rights where part or the whole river falls under any protected or reserved area.

While welcoming the concern expressed in the Draft NFP 2020 regarding the use of harmful fishing gears and exploitation of the resources, **DMF objects to the shifting of responsibility of the same to marginal communities. It is to be noted that not the marginal communities but a few individuals are responsible for the act.**

The **management approach** for inland capture fisheries proposed in the Draft NFP 2020 includes review of the leasing policies. DMF holds that the small and traditional fishers and fish-farmers engaged in livelihood practice on inland natural waters must have inalienable livelihood rights on those resources. As such, they should not be turned into lease holders subject to bidding from time to time. **Livelihood rights cannot be put up for bidding.** The small and traditional fishers and fish-farmers engaged in livelihood practice or engaged in fishing or fish farming on the natural waterbodies should be given water-use titles (pani-patta), either collective or individual, for the respective waterbodies.

The draft NFP proposes the leasing of **reservoirs** for better management. DMF is of the opinion that leasing policies and fishing rights are mutually contradictory instruments since fishing rights include the inalienable right of small and traditional fishing communities on waterbodies but



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leasing actually extinguishes this right and subjects livelihood rights to bidding. As such, DMF proposes community water-use titles on reservoirs wherever applicable. DMF also holds that pens and cages in reservoirs should be used exclusively for raising of stocking material in order to enhance the scope of capture fisheries in the reservoir waters. Additionally, only local species should be raised in the ponds and cages. The commercial utilization of the pens and cages for producing table fish is harmful for the open-water fisheries in the reservoir.

D. Aquaculture:

DMF is alarmed at the observation in the Draft NFP 2020 that “Genetic improvements in the agriculture sector have allowed farmers to raise high yielding varieties and increase their per hectare yield and thus also the income”. The experience of Indian agriculture or Green Revolution has made it clear that high agricultural yield does not necessarily lead to high incomes. Thousands of farmers have been committing suicides in the agricultural areas with highest productivity in the country. DMF does not want a similar situation to happen in the Indian aquaculture sector. As such, it is proposed that this reference of increasing income of fish farmers by adopting genetically improved, high yielding varieties be removed from the draft.

E. Brackish water Aquaculture:

DMF is alarmed at the scale of expansion in coastal brackish water aquaculture that is being proposed in the draft NFP 2020. DMF recalls that the 1996 Supreme Court judgement came as a welcome relief to millions of small-scale fish workers around our coasts who had been bearing the brunt of wildly spreading intensive prawn aquaculture that obstructed their access to the sea and degraded the coastal ecology. Intensive aquaculture undertaken by shrimp farms around our coast are wreaking havoc to the coastal soil, groundwater and waterbodies including river, estuaries and coastal waters. These are burning examples of blatant violations of the guidelines of the Coastal Aquaculture Authority Act, 2005 and Rules.

The main policy direction regarding the wildly spreading malpractice of intensive shrimp aquaculture should be immediate stoppage of the malpractices and controlling and regularizing shrimp farms and hatcheries for the best interest of our coastal environment and fisheries. Likewise, the proposed management of wastewater arising out of aquaculture operations as stated in the Draft NFP 2020 is not enough. **The shrimp farms should be strictly restrained from releasing their untreated wastewater into the watershed. Also, the conversion of agri-fields into shrimp farms should be disallowed and effective measures are to be taken to stop salinity increase in soil and groundwater.**

F. Mariculture:

Mariculture involves the erection of cages and moorings sturdy enough to withstand extreme weather events and recurrence of severe cyclones around the Indian coastline. This would require intensive capital investments for establishment and running of mariculture enterprises.



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Thus, it is not at all suitable for the small and traditional fishers, nor can it accommodate the large number of fishing communities who are reeling under the combined impacts of over-fishing by the mechanised sector and pollution.

Leasing of marine waters is in violation of the public trust doctrine which holds that the water commons cannot be privatised.

Proliferation of mariculture, apart from obstructing access of small-scale fishing communities to fishing areas, will invariably increase the pollution load in and around the mariculture areas, further hampering the open-water fish stocks and the livelihoods of small-scale fishing communities.

The PPP model proposed to play an important role in the entire mariculture development process as mentioned in the Draft NFP 2020 has very little scope for inclusion of the small and traditional fishers as they do not have either investment capabilities or technologies.

In this background, the Marine Spatial Planning (MSP) approach proposed in the Draft NFP 2020 is not going to favour the small and traditional fishing communities who are in need of a **'Coastal and Marine Fishing Communities Rights Act'** that guarantees their habitat, access to fish resources and their right to protect those resources as well. The enactment of the aforesaid act would mitigate the conflicts between fishers and mariculture farmers arising from obstruction in access to fishing ground and encroachment of fishing areas as envisioned in the Draft NFP 2020. **In view of the above DMF is of the opinion that Mariculture is not a suitable recipe for the mitigation of problems in Indian marine fisheries.**

G. Seaweed farming:

In some areas, collection of seaweed by coastal people mainly from the fishing communities has been witnessed, though directly linked with industrial processes for commercial purposes. Seaweed collection provides livelihood for many people. While the thrust for promoting seaweed farming along the coastline has been proposed in the Draft NFP 2020, its effect on small-scale fisheries, if practiced on a large scale, has not been assessed. Long stretches of near-shore seaweed farming may intervene in small-scale fishing practices with fixed bagnets, beach seines and similar gears that require to be fixed or dragged on or through the sea-bottom. The seaweed farming areas may also bar the entry of fishing boats. In view of the above, DMF reiterates the need for a **'Coastal and Marine Fishing Communities Rights Act'** in this context as well.

H. Infrastructure:

observes that the Draft NFP 2020 neglects the centrality of Beach Landing Centres (BLCs) that are used by small-scale fishing communities. Small-scale fishing has the potentiality to generate much more employment in the fisheries sector, and at the same time, is more sustainable and equitable than its mechanised counterpart. Thus, the policy on infrastructure should primarily focus



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on the BLCs. Since, admittedly, more than 90% of the 3400 fishing villages have traditional and motorised boats operating from the beaches, the policy should ensure that each BLC is equipped with:

1. Facilities for storage, roads and transport, auctioning, electricity, fuelling, ice procurement, fish drying and internet, market with cold-chain connectivity net, boat repairing places, shelters for undertaking fishing operations, restrooms and creches taking into consideration women and working mothers, medical facilities and drinking water availability;
2. In view of climate change, each and every BLC should have secure refuge facilities for boats and equipment, as well as accessible early weather warning systems;
3. In view of sea-level rise and resulting erosion, and recurrent cyclones, there should be open buffer area on the landward side of each BLC to fall back;
4. Educational facilities for the children of the fish workers who reside on the beach during the fishing season.

The infrastructure policy proposed in the Draft NFP 2020 mainly proposes facilities for the marine fishing sector, while the inland sector provides more than 2/3rd of the total fish produced and the largest share of employment in the fisheries sector, and also suffers from lack of infrastructure facilities much more than the marine sector. The policy should attach proper weightage for developing infrastructure for landing, transportation, cold-chain maintenance and market facilities (both wholesale and retail). Any master plan related to fishing infrastructure must start with micro plans that would prioritise BLCs and in addition, consider the points mentioned above.

I. Post-harvest and Trade:

Improving supply chain and value chain

The **value-addition** subsection of the Draft NFP 2020 fails to include BLCs and the associated role of small-scale vendors, as well as fish sorters and dryers. **Strengthening the value chain should not adversely affect these important sections of small-scale fish workers serving as human agents for value addition through their work on smoking, curing, pickling and drying fish by introducing external agents that may replace them.**

The small-scale fish workers' contributions to the value chain should be strengthened through certification and labelling schemes. Necessary care should be taken to ensure that small-scale fish workers roles and contributions to the value chain are not excluded from and/or adversely affected by the certification and labelling schemes.

Developing domestic marketing

DMF proposes that the Central government in collaboration with the State/UT governments must take immediate and effective measures to upgrade fish markets with adequate facilities. Together with improvement of FHs and FLCs, BLCs should also be considered for upgradation as



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the most important sector catering to the domestic fish markets.

DMF also proposes that the **centrality of small-scale fishing and small-scale fish vending in fulfilling local, regional and domestic demand must be recognized when executing these policy initiatives.**

Promoting trade and food safety

The experience of DMF on the ground is that the trickle-down effects of India's seafood growth and rising economic status, the majority of small-scale fishers, fish-farmers and fish workers are marginalised. DMF demands that the livelihood interests of these groups should be protected in the face of adverse pressures related to global trade.

J. Environment and Climate Change:

The section on the climate change is almost marine sector exclusive and misses to note the climate change impacts, in both marine and inland fisheries sector, due to droughts, floods, high winds and erosion together. Further, the increase in frequency and intensity of cyclones and salinity ingress in rivers and backwaters due to lack of flow and sea-level rise should also be taken into account. Another important observation is the exasperation of the impacts of pollution and over-fishing because of reduction of ecosystem resilience due to climate change. Given that the most severe impacts of these fall upon small-scale fishers, and **the resulting coping mechanisms must be proposed through participatory climate crisis management mechanisms with the small-scale fish workers.**

K. Ensuring ecosystem health and integrity:

DMF welcomes that the Draft NFP proposes regulatory mechanisms to control pollutants. DMF is of the understanding that pollution is one of the many causes that are leading to ecological decline and thus, **proposes the addition of regulatory mechanisms to control destructive fishing methods like bottom trawling, purse seining and mosquito net or zero net fishing or fishing by electric charge, dynamite or poisons, as well as over fishing methods like fishing with LED lights and fish finders.**

Regulating fish meal production and wild collection of juveniles

DMF objects in limiting policy initiatives only in discouraging the conversion of edible fish species to fishmeal. Indiscriminate netting of species that are non-edible to humans but edible to fishes and other water life or which are predators of fishes and other life down the food chain disrupts the marine food chain and impact the ecosystem. This ultimately affects fisheries in general, and the small-scale fishing communities in particular. Stringent measures are called for in this regard. **It is felt that on account of the importance of the matter, it deserves to be placed as an integral policy position under Marine Fisheries.**



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Blue Economy and Marine Spatial Planning

DMF reiterates its long-standing position that the approach of small-scale and traditional fishers, fish-farmers and allied fish workers is not aligned with the extractive interests of the Blue Economy development framework. We have witnessed many examples of how the extractive uses of the coasts and oceans, and its related infrastructure, have acted as encroachments on our livelihood spaces, disrupting social and economic activities, and having a negative impact on the environment. At the core of Marine Spatial Planning as a tool is the idea of dividing the coastal and marine spaces between different actors of the Blue Economy. This approach fundamentally goes against the mobile nature of marine fishing and shall lead to a curtailment of the space available for small-scale fisheries.

In view of the above, DMF proposes other components of the Blue Economy be treated as encroachments on the natural-resource base that entails infringements on the rights of the small-scale and traditional fishing communities. As such, there should be statutory safeguards with administrative initiatives to protect the fisheries sector with instruments like 'Coastal and Marine Fishing Communities Rights Act', which *inter alia* will protect the natural-resource base of fisheries, the livelihood of small and traditional fishing communities and other components of Blue Economy and provide permissible space to other components of the Blue Economy.

L. Social Security and Safety-nets:

Securing small-scale fisheries and aquaculture

DMF is in complete agreement with the direction in the Draft NFP 2020 regarding the need to define small-scale fisheries and will welcome all consultations with the relevant government authorities for conducting the same.

Meeting social security, gender equity and building resilience

DMF proposes that a comprehensive social security net should be provided to all categories of fish workers including fishers, fish-farmers, fish-vendors and allied workers which should include housing, life, accident and health insurance cover, old and infirm pension, widow pension and educational support for children. These benefits should be supplemented by insurance cover for vessels, gears and equipment, and crop insurance for small-scale fish workers, including fish farmers.

Women fish workers, both within the household and at work, play a crucial role in the maintenance and sustenance of small-scale fisheries. **DMF holds that sector-wise gender-segregated data should be generated to ascertain women fish workers' contribution to fisheries and thus, help in planning to ensure gender equity. There should be women specific schemes to comprehensively address their requirements. Women should get preferential access to the general schemes for fish workers. Also, the sectors having major contribution of women fish workers need to get more government assistance.**



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DMF has already stated its position regarding increase of **fishing ban period** in the marine sector applying the principle of scale subsidiarity. The fishing ban period mechanism should be applied to the inland sector as well for enhancement of the quantity and health of the fish stocks in all waterbodies including rivers, reservoirs, lakes and wetlands. During the fishing ban period, each and every small-scale fish worker depending on the concerned sector for livelihood, should be provided with INR 5000/month as livelihood compensation.

Institutional Credit

Regarding availability of institutional credit, DMF holds that loan-based credit schemes cannot replace existing and long-standing subsidies made available to small-scale fishing sector as they are part of the management tools used to address inequity in fisheries and must be continued.

In the recent experience of fishing community members in accessing government schemes and related institutional credit (like KCC and PMMSY), DMF found that the layout of the schemes should be more appropriate to the requirements of small-scale fish workers and the attitude of the financial institutions involved should also be sensitive to their needs.

Vessel crew and harbour-based Fish workers

A comprehensive database has to be developed regarding vessel crew and harbour-based fish workers situation and contribution to fisheries activities. This should be supplemented by the immediate implementation of the ILO 188 'Work in Fishing' convention in consultation with vessel crew and migrant fish workers.

DMF proposes a dedicated subsection for vessel crew and harbour-based fish workers wherein the policy should provide for written contracts, minimum wage rates, safe working conditions, compensation during fishing ban periods, medical and health facilities with life and accident insurance cover and facilitate collectivisation.

For migrant fish workers, the policy should additionally provide:

- **Dedicated data on migrant fish workers situation and contribution to fisheries activities;**
- **For their passage to and from home states, as well as guarantee for food and shelter during disruptions in fishing activities like during inclement weather conditions and Covid-19 pandemic.**

M. Fisheries Governance

DMF is extremely unhappy to note that the section on fisheries governance misses the centrality of fishers, fish-farmers and allied workers in the related policy proposals which was promised under the Objectives section of the Draft NFP 2020. **The small-scale fishing communities must have the right to administer or govern their sustainable access to the fish and water resources as well as the right to protect those resources from other activities and processes.** The overarching approach to fisheries governance should be the recognition of the right to governance of



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the small-scale fish workers in all the sectors of fisheries related to them and should be carried through all governance initiatives in the sector like resource-management, building of community institutions, consolidation of input and output supply channels, capacity building etc.

DMF proposes that fisheries governance should be based on the principle of securing the livelihoods of the small-scale fishers, fish-farmers and allied fish workers and *inter alia* sustaining fisheries resources by the fishing communities themselves.

Concluding comments

In preparing the above submission, DMF was constrained to limit these comments on the salient policy positions proposed in the Draft NFP 2020. It has not been possible within the short time provided to make the submission a more detailed review of the draft policy document or holding community consultations on the same. The responses contained in this draft reflect the on-ground experiences of members of the DMF.