



DAKSHINBANGA MATSYAJIBI FORUM (DMF)

Trade Union Regn. No.20474/92.

Affiliated to National Platform for Small Scale Fish Workers (NPSSF)



Memo No- DMF/President-19/23

Date- 10.01.2023

To
The Member Secretary
WBSCZMA, DD-24,
Sector I, Salt Lake,
Kolkata 700064

Sub: Inclusion of fish landing centres in the CZMP mapping process.

Ref: Letter from the PMMF to the Dept of Environment, WB dated 26/09/2022 on the subject matter of "Public Hearing regarding draft Coastal Zone Management Plan 2019" and allied matters

Dear Madam,

The undersigned is a registered trade union whose members belong to traditional small-scale fishing communities in West Bengal and therefore is an important primary stakeholder in any policy decision involving administration and/or governance of coastal areas, where hundreds of thousands of fishworkers and other traditional coastal communities have been living and pursuing livelihood activities.

This letter is in furtherance to the letter of an affiliated trade union of ours, namely the Purba Medinipur Matsyajibi Forum (PMMF), vide Memo No. PMMF/A/208(4)/22, dated 26/09/2022, as mentioned above. In the said letter PMMF had pointed out the concerns of the coastal fisherfolk and emphasised on the identification of their activity-zones in the coastal areas for indication of the same in the Coastal Zone Management Map and plans as per law (particularly para 4 r/w para 5(iii) of Annexure IV of the CRZ Regulation, 2019). The PMMF has articulated its concerns vividly in the said letter and during the erstwhile public hearing dated the 6th of September, 2022.

However, the PMMF has neither received any response to its letter nor has the PMMF seen any initiative relevant to the above concerns taken by the authorities, especially the Land Records department of the District Collector, the Department of Fisheries, and the representatives of IESWM—the agency tasked with finalising the CZMP. We are still awaiting the fulfilment of promises made to us during the said public hearing meeting, wherein the Member Secretary of the West Bengal Coastal Zone Management Authority (WBSCZMA) specifically directed the aforementioned authorities to include the fish landing centres and fisherfolk activity zones in the cadastral maps of the Coastal Zone Management plan. In this regard it is further submitted that during the public hearing on the 6th of September, 2022, the PMMF had submitted our earlier communications to the WBSCZMA particularly our letter, vide memo no. DMF/VP/EM/10/21, dated 22/02/2021, wherein we have provided a detailed description, including land records, of the areas wherein 44 fish landing centres and fishing activities have taken place.

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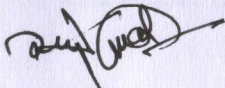
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and Wetland Management
DD-24, Sector-I, Salt Lake
Kolkata-700 064

It is further humbly pointed out that we are yet to receive a copy of the minutes of the meeting of the public hearing held on 6th of September, 2022.

Furthermore, as far as we know, no other public hearings are scheduled or have taken place for the other two coastal districts of West Bengal, namely, the North and South 24 Parganas. In this regard, we will be highly obliged, if you could kindly share the dates of the said public hearing meetings for North and South 24 Parganas districts.

We humbly request your necessary action on this issue before the map is finalised in its current form. Otherwise it will have rendered the public hearing redundant.

Thanking you-



(Debasis Shyamal)

Mob-9933602808

President,
Dakshinbanga Matsyajibi Forum

জল বাঁচাও, তট বাঁচাও

উপকূলের লোক বাঁচাও



PURBA MEDINIPUR MATSYAJIBI FORUM

পূর্ব মেদিনীপুর মৎস্যজীবী ফোরাম

দক্ষিণবঙ্গ মৎস্যজীবী ফোরাম (রেঃ জিঃ নং- ২০৪৭৪/৯২) এর শাখা



Memo No- PMMF/A/208(4)/22

To
The District Magistrate and Collector,
Purba Medinipur District,
Ganapatnagar, Uttar Sanamui.

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Institute of Environmental Studies
and Wetland Management
DD-24, Sector-I, Salt Lake
Kolkata-700 064

Subject: Public Meeting on CZMP 2019 held on 6th September 2022

Dear Madam/Sir,

Greetings from Purba Medinipur Matsyajibi Forum
(branch of Dakshinbanga Matsyajibi Forum)

The contents of this letter relate to the meeting that was held on the 6th of September, 2022 on the subject of Public Hearing for the finalization of the Coastal Zone Management Plan (CZMP) under the CRZ, 2019 process for Purba Medinipur district. This meeting was attended by the representatives of the following: Purba Medinipur District Planning Officer, Institute of Environmental Studies and Wetland Management (IESWM), West Bengal Environmental Department, Assistant Director of Fisheries, Marine and Assistant Director of Fisheries, Brackish, Department of Fisheries (Purba Medinipur District), other government officers and representatives of the Purba Medinipur Matsyajibi Forum (PMMF).

During the meeting, certain resolutions had been made in order to strengthen the process of the finalizing the CZMP through the inclusion of fisher representation and fishing livelihoods. However, as on the date of submission of this letter, no such follow up action has been initiated by the relevant department. In view thereof and of the need of the hour, we submit to you the following requests:

A. Mapping of fishing-related activities in the CZMP, 2019:

During the aforementioned meeting, the PMMF had brought to the notice of the officials present that fishing related activities, infrastructure, housing areas, and other relevant aspects of fisher livelihoods are to be included in the CZMP as per Annexure-IV in the CRZ, 2019 notification. These were not included in the draft CZMP which was uploaded on the website of the WB Environmental Department. Acknowledging the absence, the Land Records department of the District Collector, the Department of Fisheries and the representatives of IESWM, the agency tasked with finalizing the CZMP had been directed to liaise with members of the PMMF to make these inclusions. However, this process has not been initiated. Any CZMP that is completed without the inclusion of the fishing-related activities and livelihood spaces shall violate the directions of the CRZ, 2019. And as a result of the absence of this vital aspect of the CZMP, the fishing communities face the threat of eviction from coastal areas.

B. Submission made by the Department of Fisheries

During the meeting, it was brought to the notice of the PMMF that the Purba Medinipur office of the Department of Fisheries had submitted a fisheries plan for the district to the mapping agency. However, this plan and its contents are unknown to the fishers themselves. It would be vital that a copy of this plan is made available to the fishing community, for checking its accuracy and ensuring that the plan made by the Department of Fisheries includes all aspects related to livelihood activities and habitation. Furthermore, in order to aid the process of mapping as indicated in Point A above, we request that a copy of this plan be made available to PMMF in local vernacular language. The availability of the plan in advance of the physical meetings to carry out the mapping shall strengthen the mapping exercise.

C. Minutes of the meeting

The meeting held on the 6th of September, 2022 was an extensive one. Many department representatives were present and officers of the agency tasked with finalizing CZMP made presentations. Likewise, representatives of the PMMF placed their comments during the meeting. We would request you to kindly make available to PMMF a copy of the minutes of the meeting such that we can maintain a record at our end of all the subject matters and topics covered on the day.

We urge you to kindly expedite the process of mapping and direct the relevant offices to initiate the process of engaging with the fishing communities. We also request you to make available to us the plan prepared by the Department of Fisheries and the Minutes of the Meeting held on the 6th of September, 2022 in relation to the finalization of the CZMP, 2019 as well as email us at pmmf2018@rediffmail.com and to kindly copy us in further discussions and execution of decisions from 6th September, 2022 meeting in the future.

Kind regards,

(Debasis Shyamal)

Copy to-

- 1) Principal Secretary, Ministry of Environment, Forests & Climate Change, New Delhi- 110003
- 2) Member Secretary, National Coastal Management Authority, Office of the Ministry of Environment, Forests & Climate Change, New Delhi- 110003
- ✓ 3) Secretary, Environment Deptt. & Member Secretary, WBSCZMA, Kolkata.
- 4) Assistant Director of Fisheries, Brackish, Purba Medinipur.
- 5) Assistant Director of Fisheries, Marine, Purba Medinipur.

Debasis Shyamal
General Secretary. 26/09
Purba Medinipur Mahayajol Forum
Branch of Dakshinbanga Mahayajol Forum



DAKSHINBANGA MATSYAJIBI FORUM (DMF)

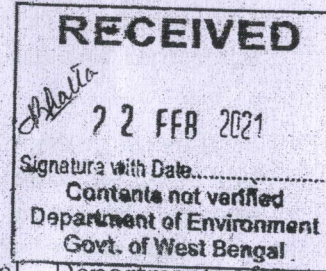
Trade Union Regn. No.20474\92. Affiliated to National Fishworkers' Forum(NFF)

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

Memo No-DMF/VP/EM/10/21

Dated: 22/02/2021

To
✓ Member Secretary,
West Bengal State Coastal
Zone Management Authority,
5th Floor, Pranisampad Bhawan,
→ Block LB-II, Salt Lake, Sector III,
Bidhannagar, Kolkata 700 106



Ref: Coastal Zone Management Plan of West Bengal, Department of Environment, Govt. of West Bengal, July 2018& CRZ Maps

Sir,

This is in reference to the above Plan a copy of which has been received by the undersigned from Department of Environment, Govt. of West Bengal vide their Letter No. EN/1562/RTI/15/2020(copy attached).

The undersigned is a registered trade union whose members belong to traditional small fishing communities in West Bengal and therefore an important primary stakeholder in any policy decision involving administration and/or governance of coastal areas, where lakhs of fishing and other traditional coastal communities have been living and pursuing livelihood activities. The CRZ Notifications of 1991, 2011 and 2019 expressly provide for several provisions that direct identification and mapping of the habitats and land uses of fishing and traditional coastal communities. However, on careful scrutiny of the above referred Plan and Maps, it becomes evident that the directions have not been complied with.

As per the CRZ Notification 2011, the Management Plan ought to have provided for detailed plans for long term housing needs of coastal fisher communities in view of expansion and other needs, provisions of basic services including sanitation, safety, and disaster preparedness. There are no such provisions made in the plan.

Further, from the above referred CRZ maps provided to us, it is evident that the fishing villages, common properties of the fishermen communities, fishing jetties, ice plants, fish drying platforms or areas infrastructure facilities of fishing and local communities such as dispensaries, roads,

schools, and the like, which should have been indicated on the maps, have not been done at all.

Not only this is in clear violation of the CRZ Notification, 2011, but it amounts to gross violation of the Fundamental Rights to Life and Livelihood of the fishermen guaranteed by our constitution. Without acknowledging their existence, the infrastructure related to their daily livelihood and without making provision for their safety and livelihood activities, the Management Plan suffers from omission of substantial facts and represents partial and/or wrong facts regarding present land use.

Even the fishing Zones in the water bodies and the fish breeding areas have not been marked, which poses serious risks to livelihood security and biodiversity. The Plan is not only incomplete but incapable of any meaningful use for planning future activities and/or approving the same.

Further, in view of the continuous encroachments and threats on the habitats as well as livelihood activities of the coastal fisher people leading to displacement of thousands, the incomplete/defective plan will be instrumental to aggravate the situation.

It is further highlighted that features like cyclone shelters, rain shelters were also supposed to have been indicated on the CZM Maps for the purpose of rescue and relief operations during cyclones, storms, tsunami and the like. That nothing of this sort has been done is evidence of complete non-application of mind and shows extreme negligence in view of recurrent disasters like Super Cyclone Amphan.

However, from the minutes of the 40th meeting of the National Coastal Zone Management Authority held on 28th August, 2020 at New Delhi, we have learnt that the CRZ Notification 2019 prescribes for updation of CZMP, by *"engaging reputed and experienced scientific institution(s) or the agencies including the National Centre for Sustainable Coastal Management (NCSCM), Chennai, of Ministry of Environment, Forest and Climate Change and in consultation with the concerned stakeholders"*. The meeting, minutes of which clearly shows the attendance of Shri Ranjan Ray from the State of West Bengal, decided that *"NCZMA deliberated the status and decided that the coastal State Government/ Union Territory Administration shall expedite the updation/revision of CZMP's and shall submit to this Ministry for early approval."* (copy attached).

We strongly hope that you would act urgently on this updation/revision of the Coastal Zone Management Plan of West Bengal and would follow the *"Guidelines for updation of coastal zone management plan prepared as per CRZ Notification, 2011 to align it with CRZ Notification, 2019"*. (copy attached).

We take this opportunity to mention that the above referred guideline stipulates among other points:

"b) Data to be provided by the States/UTs to the authorized agencies

....

iv) Stakeholder data such as Municipal maps, Notifications for legally designated urban areas etc., for new CRZ-II areas, fishing Zones in the water bodies and fishing village boundaries, breeding and Page 3 of 11 spawning grounds of fish and the like, for updating the CZMP, as applicable.

v) Infrastructure facilities such as roads, jetty, port, fish landing centers, etc.

vi) Existing authorised structures on the seaward side and features like cyclone shelters, rain shelters, helipads and other infrastructure including road network for the purpose of rescue and relief operations during cyclones, storms, tsunami and the like."

The guideline further provides for public consultation in the following manner:

"g) Public consultation of draft CZMP updated or revised based on CRZ Notification, 2019

(i) The draft CZMP so updated or revised shall be published in the websites of the concerned CZMAs of the states/UTs and also given wide publicity soliciting suggestions and objections.

(ii) The draft CZMP shall be submitted by the State Government or Union territory to the concerned Coastal Zone Management Authority for appraisal, including appropriate consultations, and recommendations thereof. Public hearing on the draft CZMP shall be held at district level by the concerned CZMA, as stipulated in para 6 (i) of Annexure-IV of the CRZ Notification, 2019.

(iii) Based on the suggestions and objections received, the draft updated CZMPs shall be finalised and submitted by the state Governments/UT administrations for final approval of MoEFCC."

We sincerely hope that omissions in the existing approved CZMP and Maps of West Bengal as pointed out by us are adequately dealt with immediately in relation to the rights of the fishing and other coastal communities, while revising and updating the said Maps and Plan.

We hope that wide, fair and proper public comments and consultations would be undertaken in order to complete the task set unto you by the CRZ Notification 2019 as well as the decision taken by the National Coastal Zone Management Authority.

We wish to participate in the process and assist the state agency in our humble capacity to ensure that rights of the fishing and other traditional coastal communities are safeguarded and their fundamental and statutory rights and entitlements are duly indicated with provisioning of appropriate and adequate management.

We further wish to point out that pending the finalization of such a revised Map and Plan, rights of fishing and other traditional coastal communities should not be ignored, overseen and/or violated in the haste to push through and/or grant approval to projects. It is also pertinent to protect the rights and entitlements of fishing communities till the revision / updation of the CRZ Management Plan.

We therefore, seek an urgent intervention on your behalf to pass appropriate interim order to all local authorities, including the district administrative authorities, authorities regulating fishing activities, local Panchayats, Municipal Corporations, Housing and other development departments and/or Corporations under the West Bengal Town and Country (Planning and Development) Act, 1979 specifying their role in safeguarding the rights and entitlements of fishing and other traditional coastal communities.

Thanking you,

Sincerely,

Debasis Shyamal
(Debasis Shyamal)

Vice-President
Dakshinbanga Matsyajidi Forum (DMF)

Memo No- DMF/VP/EM/10(3)/21

Copy to:

- 1) Principal Secretary,
Ministry of Environment, Forests & Climate Change,
Indira Paryavaran Bhawan, Jor Bagh Road,
New Delhi - 110003
- 2) Member Secretary,
National Coastal Zone Management Authority,
Office of the Ministry of Environment, Forests
& Climate Change, Indira Paryavaran Bhawan,
Jorbagh Road, New Delhi - 110003