



## NATIONAL FEDERATION OF SMALL-SCALE FISHERWORKERS

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### **Draft Mariculture Policy for Andaman & Nicobar Islands An Instrument for Selling Out Islands' Coastal Land and Waters A Warning Bell for Small-Scale Fisheries**

The National Federation of Small-Scale Fishworkers (NFSF) and the North and Middle Andaman Small-Scale Fisheries Union (NMAFSU) submit their comments on the Draft Policy '**Harnessing the Potentials of Blue Economy through Mariculture Policy, 2025**' in the following lines –

#### **A. Regarding the procedure of finalizing the Draft Policy**

The procedure followed in finalizing the draft policy betrays bureaucratic cynicism regarding stakeholder participation.

1. **Language of Publication of the draft policy** – The most important stakeholders of the policy by both number and relevance are the small-scale fish workers of the Andaman and Nicobar Islands. The small scale fishworker communities of A&N Islands have three major language groups – Hindi, Telegu and Bengali. The draft policy has been published only in English, thereby precluding the scope of the small-scale fishing communities of the UT to know its contents.

2. **Public/Community Consultations** – Although the draft policy mentions in Section 5 (Purpose and Approach) that “a series of stakeholder meetings were organised by the A&N Administration to discuss and deliberate on the points that could strengthen the sea food exports from the Islands” and that the policy guidelines were developed after taking ideas from all stakeholders, NFSF and NMAFSU observes that small-scale fish workers were not involved in any such stakeholder meeting or community consultation and their views and ideas were not taken into consideration while preparing the guidelines of the draft policy.

This is in gross contradiction with the principles enshrined in the Pre-Legislative Consultative Policy (PLCP) dated 05.02.2014 issued by the Ministry of Law and Justice, Government of India.

***We demand immediate publication of the draft policy in Hindi, Telegu and Bengali and holding of sufficient number of community consultations with the small-scale fish workers of A&N Islands before finalizing it.***

#### **B. Regarding the contents of the Draft Policy**

With regards to the contents of the draft policy, NFSF and NMAFSU observe with utmost concern that –

- i) **No space for SSF in sustainable management of natural resource:** The draft policy on 'Harnessing the Potentials of Blue Economy through Mariculture Policy, 2025' blatantly ignores the role of small-scale fish workers, the largest primary non-consumptive stakeholders of the waterbodies, in sustainable natural resource management.
- ii) **No sign of India's commitment to Global policy guidelines:** The policy fails to acknowledge India's commitments to various global instruments such as FAO's Voluntary Guidelines for Securing Sustainable Small-scale Fisheries in the Context of Food Security and Poverty Eradication (VGSSF Guidelines); the



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Code of Conduct for Responsible Fisheries (CCRF); United Nations' sustainable Development Goals (SDGs); Global Biodiversity Framework etc.

- iii) **Violates ICRZ Notification:** The draft policy bypasses the regulatory framework of Island Coastal Regulation Zone (ICRZ) Notification 2019 and does not mention of adequate measures to adhere to the provisions of Section 5 on Prohibited Activities within ICRZ which include destruction of corals, setting up of new fish processing units, discharge of untreated waste and effluents from industries, cities or towns and other human settlements etc.
- iv) **Displacing SSF to bring in big business:** By its very nature, the policy excludes small-scale fish workers and promotes private investment to boost productivity through mariculture. Auctioning of sites on PPP mode and allocating them to the highest bidder through open e-tender restricts the participation of the local fishing communities in the process. Small-scale fish workers with limited access to land, fixed assets and capital are unable to compete with powerful business and private firms in the auction and are thus automatically excluded from the process.
- v) **Selling-off SSF spaces to private farms:** The large-scale capital-intensive nature of mariculture envisioned in the policy not only threatens the vast biodiversity of the islands, it also discourages local participation in sustainable fisheries management. By inviting external investment from private businesses, the policy risks escalating conflicts between local small-scale fishers and external investors over traditional fishing grounds and space used by small-scale fish workers for allied fisheries activities.
- vi) **Small-scale fishers' access to their waters restricted:** The suggested sites for open sea cage culture such as Shoalbay, North Bay, Chidiyatapu and Minnie Bay are areas traditionally used and protected by small-scale fish workers for their subsistence and livelihood. Introduction of capital-intensive sea cage culture will restrict access of small scale fishers in those areas.
- vii) **Cage culture in bays – most dangers:** The suggested sites for open sea cage culture such as Shoalbay, North Bay, Chidiyatapu and Minnie Bay are areas important for coral reefs and sea grasses that contribute to growth of fish stock. Mariculture will decrease pH level in those waters (acidification) and this will impact the coral reefs and sea grasses.
- viii) **Algal bloom – another danger of mariculture:** Mariculture may also cause algal blooms that may negatively impact fisheries. Under certain circumstances, especially within sheltered bays, these organisms can proliferate to such an extent that they result in widespread fatalities of fish and invertebrates. This adverse impact occurs due to oxygen depletion caused by the overwhelming proliferation of these algae which causes fish kills, contaminates seafood, and disrupt ecosystems, leading to economic losses and food insecurity.
- ix) **Introduction of exotic species – a criminal offence:** The draft policy allows introduction of exotic or non-native commercial species with some examinations by experts and final recommendations by MoEF. This is dangerous for the eco-system as the long term and spatial impacts of exotic species cannot be tested in laboratories. We also know that scientific research is, more often than not, influenced by profit making enterprises. Well known environmental dictum of **Precautionary Principle** should be followed. Exotic species should never be introduced in open water cage culture.



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- x) **Commercial and exotic species are alien to local food security:** Moreover, it must be emphasized that production of commercial and exotic species for export does not fulfil the nutritional needs of the local island population who mainly rely on locally harvested fish species from small-scale capture fisheries.

Both the draft policy for 'Comprehensive Development of Fisheries of Andaman and Nicobar Islands' and the draft policy for 'Harnessing the Potentials of Blue Economy through Mariculture Policy, 2025' has one mission – to push through capital intensive extractive fish production systems in the natural and pristine waters of the Andaman and Nicobar Islands. This is at the cost of the natural resource base that has produced invaluable fisheries wealth for hundreds of years and has provided livelihood for thousands of small-scale fishing communities. The small-scale fisheries of ANI persisted without any appreciable investment from either the Government or the profit seeking entrepreneurs whom the Government is hell-bent to bring in.

These policies will marginalise the small-scale fishing communities of the Andaman and Nicobar Islands and will make the independent self-employed fishing communities dependent on the profiteers and their agents for their livelihood.

The Government of India and the Andaman and Nicobar Islands Administration should revise their mission and adopt policies that would help in developing a thriving small-scale fishery of the islands by stopping pollution and encroachments of its waters as well as overfishing and destructive fishing by the mechanised fishing boats like trawlers and purse seiners.

Instead of intensive culture systems like mariculture, cageculture, intensive shrimp farming and introduction of exotic commercial species that harm the local ecosystem, traditional and improved traditional fish culture should be encouraged. The road to prosperity lies with ecosystem enhancement and not with the destruction of the ecosystem.

The National Federation of Small-Scale Fishworkers (NFSF) and the North and Middle Andaman Small-Scale Fisheries Union (NMAFSU) reject the Draft Policy 'Harnessing the Potentials of Blue Economy through Mariculture Policy, 2025' and requests the A & N Administration to rescind it.

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