

NFSF Statement on the Draft Indian Standard *for* SUSTAINABLE BEACHES OPERATION — REQUIREMENTS

The Bureau of Indian Standards in the Ministry of Consumer Affairs, Food and Public Distribution of the Government of India has prepared a document titled *Sustainable Beaches Operation Requirements and Recommendations* and has placed it in the public domain for comments.

The document is supposed to provide Indian Standard that specifies the requirements for the sustainable operation and maintenance of beaches, focusing on key aspects essential to effective and responsible beach management.

The National Federation of Small-Scale Fish Workers (NFSF), being the largest national organisation that represents the beach based small-scale fishing communities, has been very much concerned with sustainability of beaches. Sustainability of beaches is essential for the livelihood of the fishing communities who fish in the coastal waters with beach landing fishing crafts and use the beaches for both pre and post-harvest activities.

NFSF is sorry to find that the instant *Draft Indian Standard* is published only in English precluding the access of millions of coastal fish workers to the document. Invitation of comments by the Bureau of Indian Standards certainly excluded the fish workers who are the largest primary stakeholders of our beaches. The colonial legacy is much too evident in this.

NFSF demands that the *Draft Indian Standard* be published in all regional languages of coastal India and made available to the stakeholders including the coastal fishing communities. Consultations should also be held with the stakeholders including the coastal fishing communities to collect their comments and suggestions.

NFSF is extremely perturbed that a document that claims to lay down Indian Standard for *Sustainable Beaches Operation Requirements and Recommendations* has been blind to beach-based fishing activities and beach-based fishing communities in its observations and recommendations. It may not be out of place to remind the authors of this document of the fact that by the statistics officially presented by the Government of India there are about 5 million beach-based fishers in the country who operate 1,40,272 motorised traditional and 55,748 manual traditional beach landing fishing boats. According to the Marine Fisheries Census 2016, there were 3,477 marine fishing villages along India's coast. Can anybody talk about beach sustainability in India without talking about beach-based fishing or fish workers?

Yet, this Draft Indian Standard excludes the largest primary stakeholders of our beaches and confines its concerns of beach sustainability to beach tourists and tourism service providers. It has conceptually cleaned out coastal small-scale fishing and related activities from our beaches.

It thus proposes fencing off beaches for tourists and tourism related activities to banish fishing communities from coastal stretches where they have been fishing from ancestral times.

It is conspicuous that the Draft Indian Standard has not mentioned the potential role of small-scale fishers in rescue and relief operations and the need to use their natural skills.

This Draft Indian Standard, that professes an ecosystem approach, actually aims at exclusion of small-scale coastal fishing from the natural and social ecosystem prevailing for centuries and inclusion of large-scale tourism and related activities in its place. All the talk about environmental and ecological conservation contained in the draft fall short of covering up its ulterior intent.

NFSF refuses to be duped by the good words of the draft and proclaims that our beaches belong primarily to the small-scale coastal fishing communities – the children of the sea. There can be no plan of action or standard operating practice for beach conservation or sustainability without participation of the small-scale fishing communities and their sustainability.

The Draft Indian Standard prescribes Beach Management Committee (BMC) as the administrative authority to conserve and manage a beach. In doing so it has side lined the fact that beaches are dynamic entities that are influenced by processes that are beyond the area of operation of a BMC. A shoreline intervention like port, harbour or wharf, even if not adjacent to a beach, can cause its erosion or accretion by intervening the sand movement. Mining, including sand mining; building of sea wall or artificial reefs also may also have damaging impact on the sustainability of beach. It is too difficult to imagine that a BMC will be in a position to address these, especially when the Draft Indian Standard fails to provide the BMCs with required jurisdiction.

NFSF holds that the Draft Indian Standard for *Sustainable Beaches Operation Requirements and Recommendations* is scientifically wrong and practically untenable as it fails to make an integrated approach on the one hand and propose a proper authority for the task on the other.

NFSF demands immediate withdrawal of the Draft Indian Standard for *Sustainable Beaches Operation Requirements and Recommendations*.

Our beaches are not for sale.

A handwritten signature in blue ink, reading "Pradip Chatterjee", is positioned above the typed name.

Pradip Chatterjee.
President (NFSF)

September 9, 2025.