



NATIONAL FEDERATION OF SMALL-SCALE FISHERWORKERS

Submissions of the National Federation of Small-Scale Fishworkers (NFSF) and the North and Middle Andaman Small-Scale Fisheries Union (NMSSFU) on the Draft Policy on Comprehensive Development of Fisheries in A&N Islands.

The National Federation of Small-Scale Fishworkers (NFSF) and its affiliate the North and Middle Andaman Small-Scale Fisheries Union (NMSSFU) submit their comments on the Draft Policy on Comprehensive Development of Fisheries in A&N Islands 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 – Most of the common fish workers and their representatives are not internet savvy. If the Fisheries Directorate of the A&N administration really intended to collect the opinions of the small scale fish workers of A&N islands, they should have reached out to them and held sufficient number of community consultations on 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 NMSSFU observe with utmost concern that –

- i) The draft policy fails to consider the situation of A&N fisheries sector with reference to the small-scale fish workers, its largest stakeholders. It also avoids subscribing to the universally recognised policy directions iterated in the National Policy for Marine Fisheries 2017 like sustainable development, socio-economic upliftment of fish workers, principle of subsidiarity, participatory governance, inter-generational equity, gender justice, precautionary approach etc.

The draft policy does not even mention the commitments made by our country to ensure implementation of international guidelines like Code of Conduct on Responsible Fisheries (CCRF) or Voluntary Guidelines for Small Scale Fisheries.

Instead the draft policy openly declares that “The primary focus of the policy is to attract investment for sustainable fisheries development in the islands with new initiatives in brackish



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water aquaculture and Mariculture of high value species.” Large investment with big business, not small scale fisheries, is the loadstar of this draft policy.

- ii) Blinded by the commitment to pave the way for big business in A&N fisheries, the authors of the policy did not leave any space in the policy document to mention the specific difficulties and sufferings of small scale fishing communities in both marine and inland sectors;
- iii) The draft policy limits utilization of islands fisheries resources largely to the development of capital intensive culture-based fisheries like mariculture, and brackish or freshwater aquaculture enterprises. It neglects improvement of the small scale fisheries based capture or culture fisheries sectors which are the backbones of islands’ fisheries and provides livelihood for most of the small scale fish workers.
- iv) The draft policy fails to consider the sustainable yield of the islands’ fisheries potential. For sustainable utilization of fisheries resources, the thumb rule is to match fishing effort with sustainable yield. This rule needs to be followed by applying the principle of scale subsidiarity. The policy neither mentions such principles nor finds the need to assess the sustainable yield of fish and consider preferential access of small scale fishing communities to marine fish resources in planning to enhance the islands’ fish production.
- v) No environmental impact assessment (EIA) is provided for the reclamation of 618 hectares of area for development of brackish water aquaculture. Such development will involve reclamation of mangrove cover which will threaten the survival of important species in the mangrove ecosystem such as the saltwater crocodiles and the 60 species of mangroves which are crucial for carbon sequestration.
- vi) The draft policy proposes to promote cage culture in 5 bays of the islands. The bays are Shoal Bay, North Bay, Chidia Tapu and Minnie Bay. Bays have sensitive ecosystems, rich biodiversity, natural nurseries for fish and are important fishing grounds of small scale fishers. Bays have less wave, sea current and winds and as such are considered suitable for cage culture. But, for the same reasons, bays are more susceptible to pollution. Promotion of cage culture in bays will have big impact on small scale fisheries.
- vii) The draft policy refuses to recognize the main problems of small scale fish farmers of A&N islands, who are suffering from want of quality fish seed and feed, market for their produce and finance. It advocates for the entry of big business in fisheries with commercially viable species and direct sale in overseas market.
- viii) The system of auctioning the sites in marine, brackish and freshwater aquaculture on PPP mode is exclusionary by its design. Small-scale fish workers with their limited investment capabilities will automatically be excluded if the sites are allocated to the highest bidder based on e-tender. Such a system facilitates the promotion of ‘blue grabbing’ of coastal and inland spaces by private investors in the name of development by displacing the traditional small-scale fishing communities from their livelihood.
- ix) The draft policy fails to mention the need for legal recognition of customary tenure rights of the small-scale fish workers over the waters and adjoining lands used by fishing communities in both marine and inland sectors for the work in fishing.



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- x) The system of leasing out the water bodies for aquaculture by the A&N administration violates the customary tenure rights of traditional small scale fishing communities who have ensured sustainable use and protection of the water bodies for their livelihood, for generations. The leasing system of the administration denies community ownership and exiles the small-scale fish workers from their own home.
- xi) The draft policy fails to acknowledge the impact of farming commercial fish species like Cobia, Pompano, Seabass, Groupers etc. on the sustainability and reproductive capacity of the local ecosystems as well as the negative social effect on the traditional small-scale fish workers who depend on the native species of the island ecosystem for their livelihood. This is actually a decree of eviction for the small scale fish farmers.
- xii) The document also does not have any mention of subsidies to assist small-scale fish farmers with necessary inputs for sustainable fish farming of native species.
- xiii) There is no mention of subsidies to small scale fish workers for making vessels, investing on sustainable gear, insurance coverages for accidents and death, access to cold storage boxes and infrastructure for mobile fish vending, and access to other social security coverage. Climate finance for loss and damage to fishing gear and property of fishing communities from extreme weather events is also grossly absent in the document.
- xiv) In section 17.1 on fisheries resource management, the draft policy fails to acknowledge the participation of small-scale fish workers in decision making and consultation related to sustainable management of the islands' fisheries. The draft policy has no commitment for community based resource management or co-management.
- xv) Application of community-based Monitoring, Control and Surveillance to ensure that the rules and regulations of the A&N Islands Marine Fishing Regulation regarding use of fishing gear and protection of natural resources are strictly implemented, is absent in the document.

The National Federation of Small-Scale Fishworkers (NFSF) and the North and Middle Andaman Small-Scale Fisheries Union (NMSFU) reject the Draft Policy on Comprehensive Development of Fisheries in A&N Islands and urge upon the Directorate of Fisheries, Andaman and Nicobar Administration to fundamentally revise it so that the livelihood of small-scale fish workers and its natural resource base is protected instead of promoting big business to destroy the same.

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