



NATIONAL PLATFORM FOR SMALL SCALE FISHWORKERS

Date: 30th January, 2021

To:

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

Sub: Submission of comments of the National Platform for Small Scale Fish Workers on the Draft National Fisheries Policy 2020.

Madam/Sir,
Greetings from National Platform for Small Scale Fish Workers (NPSSFW).

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

Sincerely,

Pradip Chatterjee,
Convener,
National Platform for Small Scale Fish Workers
(NPSSFW).



Comments on Draft National Fisheries Policy 2020:

Procedure of Preparation of the Draft NFP 2020 and Invitation of Comments

National Platform for Small Scale Fish Workers (NPSSFW) welcomes the publication of the Draft National Fisheries Policy 2020 (NFP 2020) which has been long overdue. The process started with the revision of National Policy on Marine Fisheries, 2004 and went along preparation and publication of Draft National Inland Fisheries and Aquaculture Policy; Draft National Mariculture Policy and Draft National Policy on Post-Harvest, Processing and Marketing of Fish and Fisheries Products. It took 6 years to arrive at the present draft which has rightly attempted to make a comprehensive policy document on Indian fisheries encompassing its major segments and main categories of the work in fishing with associated sectors. It is quite evident from an overview of the over stretched out process that the road map to prepare such a document was not apparent at the outset and much time, effort and resource had been wasted in the long-drawn-out exercise.

National Platform for Small Scale Fish Workers (NPSSFW) also welcomes the move of the Department of Fisheries, Government of India to involve some of the nationally acclaimed experts in the exercise of drawing the Draft NFP 2020. **But at the same time regrets the denial of scope for fish workers' organisations to participate in the process which was demanded by the National Platform for Small Scale Fish Workers (NPSSFW).**

National Platform for Small Scale Fish Workers (NPSSFW) 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. We regret that the Draft NFP 2020 has not been translated in some regional languages like Manipuri, Mizo, Naga in the North-East, Konkani and Rajasthani in the West and Kashmiri in the North. Fish workers belonging to the above language groups work in important fisheries sectors in the above-mentioned regions. **NPSSFW reiterates that the draft should be published in all regional languages of the country.**

National Platform for Small Scale Fish Workers (NPSSFW) further welcomes publication of the Draft NFP 2020 on the website of the Department of Fisheries under the Ministry of Fisheries, Animal Husbandry & Dairying, Government of India, which too **had been one of the demands of NPSSFW.**

But we are taken aback to note 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 (in English) document. This actually 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. **NPSSFW 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. **NPSSFW reiterates its demand 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

NPSSFW 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 in detail and has attempted to address those. Though there have been limitations in systematic identifications of problems of respective sectors and relate those to policy proposals.

NPSSFW also acknowledges that the Draft NFP 2020 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.

NPSSFW 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.

NPSSFW 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.

The baseline scenario data appended to the Draft NFP 2020 requires to have segregated fish landing data in marine sector by depth and by category of vessel, and in the inland sector by capture and culture, with respect to different categories of waterbodies.

Section-wise comments related to the Draft NFP 2020

A. Introductory Sections:

Introduction

NPSSFW welcomes the statement made in the 'introduction', "Accepting the fact that the fisheries resources are set in diverse ecosystems that determine the health and the integrity of the resources and the plant and animal wealth contained in it, the NFP will adopt a mountain to sea-scape approach. This will ensure that the sector receives minimum adverse impacts from external sources and in the process creates minimum adverse impacts on the environment." But NPSSFW differs with the statement, "Within the framework of 'Blue Economy', the NFP will also ensure a productive integration with the other economic sectors, such as agriculture, livestock, water resources, hydro-electric power, energy, forestry and environment, eco-tourism, rural development, shipping, etc. to meet the goals of the 'Blue Economy' because:



1. Blue Economy concerns itself basically with the sea and related sectors and do not encompass fisheries as a whole thus fisheries cannot place itself within the framework of Blue Economy;
2. The components of Blue Economy as described in the GoI documents are not mutually conducive and do not abide by the notion of 'creating minimum adverse impact on the environment or fisheries. This is evident from the impacts of Sagarmala, shipping corridor, waterways and other undertakings of Blue Economy on fisheries and small-scale fish workers.

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.

The introduction section of the Draft NFP 2020 has failed to mention the central role of small-scale fishworkers 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, NPSSFW proposes the following inclusion:

"Role of small-scale fishworkers in the fisheries sector of India is central since small-scale fishworkers 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".

Preamble

It is stated in the Draft that "the National Fisheries Policy will aim at furthering equity and equality, ensuring sustainability, mainstreaming gender and enhancing its role, fostering inclusive development, promoting self-reliance and entrepreneurship, building partnerships, maintaining intergenerational equity, following the principle of subsidiarity, and charting a road-map for the fisheries sector for the coming one decade".

NPSSFW holds that the Draft NFP 2020 should not 'aim at' but be 'based on' overarching principles that would provide guidance and preclude divergence from those, not only for its present policy proposals but also in dealing with policy requirements in future. In this we reiterate the statement made in the 'National Policy for Marine Fisheries 2017' that read **"The overall strategy of the NPMF, 2017 is based on seven pillars, namely sustainable development, socio-economic upliftment of fishers, principle of subsidiarity, partnership, inter-generational equity, gender justice and precautionary approach"**.

"Fostering inclusive development", "promoting self-reliance and entrepreneurship" and charting a road-map for the fisheries sector for the coming one decade" should of course be added to the above basic principles. NPSSFW proposes the following substitution:

"The overall strategy of the NFP, 2020 is based on seven pillars, namely sustainable development, socio-economic upliftment of fish workers, principle of subsidiarity, partnership, inter-generational equity, gender justice and precautionary approach with the aim for fostering inclusive development, promoting self-reliance and entrepreneurship and charting a road-map for the fisheries sector for the coming one decade".



Mission

The 'Mission' stated in Draft NFP, 2020 reads, "While keeping the sustainability of the resources at the core of all actions, the National Fisheries Policy will meet the social and economic goals and well-being of the fishers and fish farmers and is intended to guide the coordination and management of the fisheries sector in the country during the next ten years". In referring to 'fishers and fish farmers' it leaves out huge number of ancillary workers like fish sorters and dryers, fish vendors, net makers and repairers etc. majority of whom are women. 'Mission' should include all and we propose the following substitution:

"While keeping the sustainability of the resources at the core of all actions, the National Fisheries Policy will meet the social and economic goals and well-being of the fishers, fish farmers and ancillary fish workers and is intended to guide the coordination and management of the fisheries sector in the country during the next ten years"

Objectives

In the similar vein, to include the ancillary fishworkers and prioritise the protection of rights of fishing and fish-farming communities, the section under 'Objectives' should be rewritten as:

"The objective of the National Fisheries Policy is to secure the overall development of capture fisheries and aquaculture in the country. While the fishers, fish farmers and ancillary fishworkers will be at the core of the Policy, the intent will be to ensure protecting the rights of the fishing and farming communities and building their resilience, sound management and sustainable development of the resources and associated habitats, maintaining the ecosystem integrity, meeting the food and nutritional security of the growing population, making Indian fish and fish products globally competitive, and supporting India's commitment towards fulfilment of the global agenda on sustainable and wise-use of the fisheries resources".

Strategy

The section starts with the statement, "The National Fisheries Policy (NFP) encompasses the entire land and the EEZ of the country and is set in a time-frame of ten years (2021-2030)". It misses to mention the Indian fishing assets and efforts in the ABNJ. As such, the statement should be recast as:

"The National Fisheries Policy (NFP) encompasses the entire land and the EEZ of the country, as well as its fishing assets and efforts in ABNJ waters and is set in a time-frame of ten years (2021-2030)".

B. Marine Fisheries:

The introduction to the Marine Fisheries sub-section fails to give a comprehensive picture of the marine fisheries sector as a whole. It is not enough to state that the sector is characterised by the predominance of small-scale fisheries. NPSSF proposes insertion of the following:

"As per government data on marine fisheries it is seen that:

- 1. Though the small-scale fishworkers are predominant in number, yet, the small-scale fisheries take less than 20% of the total marine catch, while more than 80% is netted by the mechanised sector;**
- 2. Most of the catch taken by the mechanised sector is from the near-shore areas (0-100 meters depth), depriving the small-scale fishworkers their legitimate and traditional share of the fish stock;**
- 3. The near-shore fishing areas of the country are over-fished and are showing serious indication of stock depletion and collapse;**



4. **As a result, in spite of the marine fishing sector generating economic wealth of INR 65,000 crores per year, 61% of the marine fisher population is estimated to be Below Poverty Line;**

Taken together, the situation demands urgent reallocation of resources with preferential access for small-scale fishworkers and downsizing of the effort of the mechanised fleet to ensure sustainability and equity”.

Sustaining 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. However, by not stating the problems of inequity and unsustainability in the near-shore fishing sector, the policy vision renders itself partial. NPSSF holds that the shift of effort to deeper waters should start by addressing the challenges of near-shore fisheries using the principles outlined in the preamble to the Draft NFP 2020. In addition, NPSSF notes that the total number of women fishworkers engaged in capture fisheries, fish seed and shellfish collection has been underestimated and should be rectified to reflect the existing situation on the ground. The points below must be taken into consideration as key areas for immediate intervention via the Draft NFP 2020.

NPSSF proposes that the sustenance of marine fisheries be built on:

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

NPSSF 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.

Ecosystem Approach to Fisheries Management (EAFM)

Since the marine ecosystem is inseparably linked with coastal, estuarine and river ecosystems, the text “The Ecosystem Approach to Fisheries Management (EAFM) will be implemented with due consideration of the well-being of all living and non-living constituents of the marine ecosystem and the social attributes and economic needs of the stakeholders” should be reworded as:

“The Ecosystem Approach to Fisheries Management (EAFM) will be implemented with due consideration of the well-being of all living and non-living constituents of the marine ecosystem with due importance to the adjoining coastal, estuarine and riverine ecosystems, and the social attributes and economic needs of the stakeholders”.

Co-management

While NPSSFW 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 fishworkers from fisheries management.

Deep-sea fishing

The Draft NFP 2020 proposes that, “Private investments will be promoted in deep-sea fishing and processing to fully harness the potential of the marine fishery for inclusive development”. In the next paragraph, it states that “The Government will introduce new scheme(s) for enhancing the skills and capabilities of the artisanal fishers to undertake and popularize deep sea fishing, modernization of the existing deep-sea fishing fleet, introduction of new/improved indigenous deep-sea fishing vessels through fisher cooperatives/self-help groups (SHGs), on-board training and linkage to markets and export.”

Promotion of private investments is not conducive to promotion of artisanal/small-scale fishers in undertaking deep-sea fishing. NPSSFW 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.

Holistic resource utilization

NPSSFW welcomes the proposal of the Draft NFP 2020 for developing “a holistic resource utilization plan for the EEZ in consultation with the coastal State/Union Territory (UT) Governments, taking into consideration the requirements of coastal States/UTs and the special and unique needs of the two Island UTs, the Andaman & Nicobar and the Lakshadweep”. It also appreciates the proposed coordinated approach on the part of coastal States/UTs with the Union government to utilise the fisheries resources between 12-200 nautical miles (EEZ) as a common resource. But NPSSFW is concerned to note that in developing the plan for ‘holistic resource utilization’ plan, no space is provided for SSFW or their organisations.



Monitoring, Control and Surveillance

The Draft NFP 2020 refers to the development of an MCS regime on the basis of the National Plan of Action on MCS (NPOA-MCS) adopted by the government. However, the NPOA-MCS document is not available in the public domain till date as an official document. NPSSFW proposes that the reference to the NPOA-MCS should be withheld and that the section should be revisited after NPOA-MCS is available in the public domain. However, NPSSFW makes the following observations:

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. NPSSFW 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 sorry state of inland capture fisheries in general, and that of the riverine fisheries in particular, as well as the decreasing accessibility of the small-scale fish farmers to waterbodies, including ponds and tanks, make it indispensable to have statutory measures to protect their access to the water and fish resources, as well as to protect those resources from encroachment, degradation and dispossession. **NPSSFW 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. NPSSFW welcomes the observation regarding displacement of riparian communities observed in the Draft NFP 2020 and proposes the following substitution to the line "The riparian communities along the major river systems of India have been as old and traditional as the marine fishers, although with the changing scenario in the inland sector, their migration to other sources of livelihoods is more prominent than any other food production sector" as follows:

"The riparian communities along the major river systems of India have been as old and traditional as the marine fishers, although due to factors external to fisheries, their displacement to other sources of livelihoods is more prominent than any other food production sector".



Managing fisheries in the Indian rivers and their floodplains, natural lakes and wetlands

Rivers

While identifying the problems of riverine fisheries and addressing them in the river section of the Draft NFP 2020, the draft has missed to mention harmful fishing gears and devices, dams and barrages, dredging and inland waterways. **NPSSFW proposes immediate and effective steps to stop the use of harmful fishing gears and devices like mosquito nets, dynamite and electric fishing and poison. NPSSFW also proposes 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. NPSSFW further proposes 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.**

NPSSFW 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.

Estuaries

NPSSFW proposes that the line “Further, with the upstream abstraction of water, the required flow of freshwater into the estuaries has gradually diminished, affecting its unique characteristic and consequent reduction in the production and productivity of fin and shellfishes” be rewritten as:

“Further, with the upstream abstraction of water, the required flow of freshwater into the estuaries has gradually diminished, resulting in salinity ingress, enhanced by sea-level rise that affect its unique characteristic and consequent reduction in the production and productivity of fin and shellfishes”.

Floodplain lakes

The existence of floodplain lakes is typical of almost all, if not all, river basin. As such, NPSSFW proposes to rewrite the line “Floodplain lakes, as a continuum of the rivers and their tributaries, have since time immemorial formed vital fisheries resources in the Ganga and the Brahmaputra river basins” as follows:

“Floodplain lakes, as a continuum of the rivers and their tributaries, have since time immemorial formed vital fisheries resources in the river basins”.

While welcoming the concern expressed in the Draft NFP 2020 regarding the use of harmful fishing gears and exploitation of the resources, NPSSFW 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. So, the statement has to be rewritten as:

“The use of harmful fishing gear and excessive exploitation of the resources by certain individuals from marginal communities needs regulation”.

Natural lakes and wetlands

The biggest problem facing lakes and wetlands in the country is a disbalance between inflow and outflow of water, together with siltation and growth of algae and weeds. These are affecting the natural ecology of these waterbodies and fish resources. The Draft NFP 2020 should propose a mechanism for natural lakes and wetlands to be restored and protected in



consultation with the small-scale fishers dependent on these waterbodies for their livelihood.

The management approach for inland capture fisheries proposed in the Draft NFP 2020 includes review of the leasing policies. NPSSFW 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.

NPSSFW is of the opinion that the proposed management approach stated in the Draft NFP 2020 on “habitat restoration including de-encroachment and regulation on minimum water flow in the rivers and their tributaries that will ultimately reach the estuaries” should be rewritten as:

“habitat restoration including de-encroachment and pollution control with regulations to ensure adequate ecological flow in the rivers and their tributaries up to the estuaries”.

NPSSFW is of the opinion that the proposed management approach of “ensuring adequate flow of seawater into the estuarine lakes through regular dredging of the lake mouth” should be rewritten as:

“ensuring adequate flow of seawater into the estuarine lakes through regular dredging of the lake mouth without intervening underwater channels”.

NPSSFW proposes that the management approach contained in “Bearing in mind that the Government intends to link major rivers, policy interventions will ensure that such linkages do not have an adverse impact on the fisheries resources and more importantly on the endemic germplasm that the rivers harbour” should be rewritten as:

“Bearing in mind that the Government intends to link major rivers and install national waterways, policy interventions must ensure that such development do not have an adverse impact on the fisheries resources and more importantly on the endemic germplasm that the rivers harbour”.

Reservoirs

NPSSFW 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 leasing actually extinguishes this right and subjects livelihood rights to bidding. **As such, NPSSFW proposes community water-use titles on reservoirs wherever applicable.** NPSSFW 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.

NPSSFW proposes to include in the ‘key areas for immediate intervention’ the following:

- *Enacting ‘Small-Scale Fishers and Fish Farmers Right to Waterbodies (Sustainable use and Protection) Act’*
- *Stopping destructive methods and gears for fishing in all inland waters*
- *Ensuring livelihood rights in inland waters falling under protected areas*



D. Aquaculture:

In order to ensure the fish farmers' security of tenure on fresh water, NPSSFW proposes to rewrite the line, "Aquaculture has to also deal with the competing demand for freshwater from other users and policy interventions will be required to secure water resources for the fish farmers" as follows:

"Aquaculture has to also deal with the competing demand for freshwater from other users and policy interventions will be required to secure water resources for the fish farmers. For public waterbodies, it would mean conferring water-use titles, either collective or individual, to fish farmers and for private waterbodies, it would mean security of lease that would include: a. regulation for fixing and increment of lease rent, b. proper lease agreement, and c. guarantee against eviction from concerned waterbody".

NPSSFW 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. NPSSFW 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 improves, high yielding varieties be removed from the draft.

NPSSFW highlights that the key area for immediate intervention which includes *"Securing water resources for fish farmers and setting up of fish farmers' organizations"* should be replaced as follows:

"Securing water resources for fish farmers through provision of water-use titles on public water bodies and security of lease on private water bodies through 'Small-Scale Fishers and Fish Farmers Right to Waterbodies (Sustainable use and Protection) Act' together with setting up fish farmers' organizations".

E. Brackish water Aquaculture:

While the statement "The White Spot Syndrome Disease (WSSD) and the December 2016 judgement by the Supreme Court brought a halt to the activities" mentions the time of the judgement wrongly, which is December, 1996, a larger wrong has been done in accusing the judgement to be responsible for stalling the boom of intensive prawn aquaculture. The judgement of the Supreme Court came as a welcome relief to millions of small-scale fishworkers 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.

NPSSFW also basically differs with the observation made in the Draft NFP 2020 "Such productive utilisation of coastal land, which otherwise has limited economic use will be promoted for aquaculture through suitable land-leasing policies and provision of the infrastructure that would be required for setting up of farms, hatcheries, etc.". 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. It is an irony that the Draft NFP 2020 states that "The Rules and Guidelines framed under the Act, provide necessary guidance to the sector for setting up of shrimp farms and their operation". **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.

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.**

NPSSF objects to the following statement made under the key areas of immediate intervention *“Facilitating further expansion of shrimp farming for productive utilisation of coastal areas, creating employment, and enhancing food and nutritional security”* because the expansion of intensive shrimp farming is destructive utilization of coastal areas, instead of creating employment it harms and reduces employment prospects in coastal small-scale fisheries and it has nothing to do with the food and nutritional security of the country because the majority of the product is for foreign markets.

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. 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 NPSSF is of the opinion that:

- 1. Mariculture is not a suitable recipe for the mitigation of problems in Indian marine fisheries;**
- 2. The introduction of mariculture should be strictly on experimental basis undertaken with the informed consent of the fishing communities operating in the area and by collective initiatives of the members of the fishing community themselves.**



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. Entry of investors in the sector is bound to marginalise the current seaweed collector communities. 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, NPSSFW urges precautionary measures so that the interest of the small-scale fishers and local seaweed collecting communities are safeguarded. NPSSFW reiterates the need for a **'Coastal and Marine Fishing Communities Rights Act'** in this context as well.

H. Ornamental fish farming:

NPSSFW proposes to add under the 'key areas for immediate intervention' the following point:

- *Encouraging small-scale fishers, fish-farmers and other fish workers in taking up ornamental fish farming as additional livelihood practice.*

I. Inland saline soils:

NPSSFW notes that the Draft NFP 2020 gives consideration to the disposal of wastewaters from aquaculture undertaken in inland saline soils. Further, the potential area available for inland saline soil aquaculture is estimated to be about six times the size of land identified as suitable for coastal brackish water aquaculture. Given that the policy proposes the undertaking of intensive aquaculture of species such as shrimp, NPSSFW would like to reiterate that the experience of small-scale fish workers in regards to the outflow of wastewater into the coastal areas is that it has a deleterious impact on the coastal ecology. NPSSFW thus recommends, that an act called the 'Saline Soil Aquaculture Authority Act' be enacted along the lines of the Coastal Aquaculture Authority Act, 2005 in order to regulate the inland saline soil aquaculture activities.

In the 'key areas for immediate intervention', the following should be the first point of intervention:

- *Enact the 'Saline Soil Aquaculture Authority Act' in order to regulate the inland saline soil aquaculture activities.*

J. Aquatic health and biosecurity:

NPSSFW notes the mention of the Epizootic Ulcerative Syndrome (EUS) in fresh water fishes and the White Spot Syndrome Disease (WSSD) in shrimp aquaculture as having caused large scale mortalities in the country. It must be understood that these mortalities were caused by intensive unsustainable aquaculture with over-stocking, antibiotics, growth hormones coupled with poor biosecurity and hygienic conditions. As a result, NPSSFW recommends adding the following point in the 'key areas for immediate intervention':

- *Develop a Monitoring, Control and Surveillance regime on aquatic animal health and biosecurity, especially on intensive aquaculture.*



K. Infrastructure:

The infrastructure facilities developed so far for marine fisheries have been disproportionately in favour of the mechanised sector. The construction of huge numbers of fishing harbours (FHs) has led to avoidable shore-line interventions that cause severe environmental problems like erosion and accretion and affects the beach-based small-scale fishing communities. Further, in view of the depletion of fish resources, the mechanised fleet size requires to be appropriately reduced. In view of these, attention should be given to augment facilities in existing FHs and FLCs and not on increasing their number.

NPSSF 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 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.**

Our coast is replete with discarded, dilapidated and unused infrastructure developed to serve fishing activities. This should serve as a reminder that participatory planning with fishing communities is a precondition for proper installation and utilisation of infrastructure. **Wherever possible, all discarded, dilapidated and unused infrastructure should be removed to reduce stress on the coast.**

In this vein, the 'key areas for immediate intervention' should be appropriately amended. **NPSSF holds that both the National Fishing Harbour Authority and the Inter-Ministerial/Department committee should have adequate representation from the small-scale fishing communities who are the largest primary stakeholders.**

While developing the infrastructure facilities through public, private and/or public-private finance, **the right of the users of these facilities, that is of the fish workers, should be ensured.**

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. **Consequently,**



the 'National Fishing Harbour Authority' should be renamed as 'National Fisheries Infrastructure Authority'.

L. 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

The observation made under this subsection is inappropriate in its observation regarding the following, "Fish is sold in the most unhygienic manner at the landing sites and or at wholesale/retail markets. Despite substantial assistance being made available by the Government for setting up/improving FHs and FLCs and fish markets, the situation has not improved". Governments' responsibility is not limited to making available the assistance but also lies in ensuring the utilization of the assistance for the intended outcomes. **As such, 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 the most important sector catering to the domestic fish markets.**

NPSSF welcomes that the Draft NFP 2020 mentions the need for developing domestic markets as part of the post Covid-19 recovery. **However, the platform 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.**

The overwhelming experience of online fish marketing indicates that it takes away wholesale and retail fish markets from the small-scale fish vendors, and benefits entrepreneurs coming from outside the sector. NPSSF objects to the policy direction "shortening of the value chain will be remunerative for fishers as they will have an increasing share of the consumer's rupee". Actually, the small-scale fishers and fish farmers will be harnessed to the online market managers/entrepreneurs in this exercise and the large number of small-scale fish vendors will be losing their livelihoods. It is important to ensure that small-scale fishers, fish-farmers, fish-retailers/vendors and fish-processors are included in the online marketing process. This has to be put in place through necessary capacity building of the fish workers' groups through their collectives.

Under the 'key areas for immediate intervention' point, "*Promoting product development and new marketing methods such as online marketing*" should be replaced by the following:

"Promoting and strengthening small-scale fishers, fish-farmers, fish-retailers/vendors and fish-processors collectives through product development and new marketing methods such as online marketing".



Promoting trade and food safety

With reference to the observation made in the Draft NFP 2020, that “India, with its rising economic status and other factors is likely to lose/fail to regain most preferential tariff agreements. Therefore, the policy directions will also be oriented towards keeping India competitive”, NPSSFW highlights that in spite of the rising economic status, the majority of small-scale fishers, fish-farmers and fish workers are marginalised. The requirements of competitiveness in international trade should not further marginalise the small-scale fishers, fish-farmers and fish workers. In other words, the livelihood interests of these groups should be protected in the face of adverse pressures related to global trade.

M. 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.

In addition to the observation, “As part of India’s international commitments on climate change, the concept of green fisheries by reducing Green House Gases (GHG) emissions from fishing and fishing-related activities will also be encouraged through dedicated activities”, NPSSFW makes the following addition:

“Efforts for reduction of Green House Gas (GHG) emissions from fishing and fishing-related activities should first be directed to the mechanised sector and the intensive aquaculture sector, as they are responsible for the largest GHG emissions in Indian fisheries”.

NPSSFW proposed that under the ‘key areas for immediate intervention’, the line “Supporting studies to better understand the impacts of climate change on fishing and fish farming” should be replaced by:

“Supporting studies to better understand the impacts of climate change on fisheries all over the country”.

NPSSFW proposed that under the ‘key areas for immediate intervention’, the following point be added:

Develop participatory climate crisis management mechanisms with the small-scale fishworkers.

NPSSFW proposes to add some more factors related to pollution to the line, “With the increasing anthropogenic activities on land and inadequate mechanisms for effluent treatment, the abundance of solid waste and in particular plastics (especially, micro-plastic particles) have increased manifold in the sea as well as in the inland waters, resulting in negative impacts on the fauna and flora. There are also several alarming studies that indicate the movement of micro-plastic particles back to the human being through the fish food cycle” as follows:

“With the increasing anthropogenic activities on land and inadequate mechanisms for effluent treatment, waste water, ballast water, anti-fouling reagents, ship-breaking waste, chemical runoff from agriculture and the abundance of solid waste, in particular plastics (especially, micro-plastic particles) have increased manifold in the sea as well as in the inland waters, resulting in negative impacts on the fauna and flora. There are also



several alarming studies that indicate the movement of micro-plastic particles back to the human being through the fish food cycle”.

N. Ensuring ecosystem health and integrity:

NPSSFW welcomes that the Draft NFP 2020 states that, “The state of the environment in both marine and inland waters in India is under stress due to pollution”. However, this is an incomplete statement not covering other factors and thus, NPSSFW recommends rewording the statement as follows:

“The state of the environment in both marine and inland waters in India is under stress due to pollution along with construction obstructing natural flows, inappropriate policies and mismanagement of fisheries”.

NPSSFW also recommends that the policy directive which “will aim at strengthening regulatory mechanisms to control pollutants to ensure that the land and sea-based pollution is effectively controlled and the ecosystems monitored” be reworded to include the following:

“The policy directive which will aim at strengthening regulatory mechanisms to control pollutants to ensure that the land and sea-based pollution is effectively controlled and the ecosystems monitored. In addition, 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 will be banned or controlled.”

NPSSFW also recommends that the line, “In the inland sector, the dams and barrages constructed over rivers and their tributaries often restrict the migration of fish species that move up and downstream for completing parts of their biological life-cycle” be replaced by the following:

“In the inland sector, the dams and barrages constructed over rivers and their tributaries often restrict the migration of fish species that move up and downstream for completing parts of their biological life-cycle. Thus, it is vital to ensure that water allocation to consumptive uses from natural water bodies do not harm their ecological health”.

NPSSFW recommends editing the first point in the ‘key areas for immediate intervention’ *“Strengthening regulatory mechanisms to control pollutants, including plastics, and to encourage leading by example by taking necessary measures to reduce pollution from fishing”* as follows:

- ***“Strengthening regulatory mechanisms to control pollutants, including plastics, and to address destructive fishing and overfishing”.***

Regulating fish meal production and wild collection of juveniles

NPSSFW 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.**

Blue Economy and Marine Spatial Planning

NPSSFW observes that in the subsection under ‘Blue Economy and Marine Spatial Planning’ in the Draft NFP 2020, the marine fisheries sector has been treated at par with other



components of the Blue Economy. The Draft NFP 2020 should mention that the natural-resource based marine fisheries sector is not comparable to other components of the Blue Economy as the natural fisheries resource is irreplaceable and has its own laws of existence and regeneration that cannot be engineered through external efforts. **As such, the components of the Blue Economy, other than fisheries, should be amenable to the needs of natural-resource base of fisheries and to the livelihood interest of community of small and traditional fishers who are an integral part of the marine ecosystem.**

In view of the above, NPSSF 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.

O. Social Security and Safety-nets:

Securing small-scale fisheries and aquaculture

NPSSF is in complete agreement with the direction in the Draft NFP 2020 regarding the need to define small-scale fisheries and proposes the following definition:

"Small scale fisheries are fisheries where fishers and allied workers are directly engaged in work mainly for subsistence as against for commercial purpose exploiting others' labour".

The salient attributes of small-scale fisheries are that it is **more traditional, more sustainable and more equitable.**

Meeting social security, gender equity and building resilience

NPSSF welcomes the policy statement "to provide adequate safety nets to the fisher community/fish workers in the country through the Direct Benefit Transfer Scheme (DBTS)" that would include community welfare, insurance, housing, and other amenities for fishers. In this regard, NPSSF reiterates that **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. **NPSSF 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.**

NPSSF suggests a dedicated subsection for women fish workers that contains the following:

Women Fish Workers and Gender Equity: Women fish workers constitute more than half of the total workforce in fisheries. In fisheries sector women workers are more marginalised than their male counterparts and are in less favourable condition to address their problems. This calls for gender sensitive policies in resource allocation and access.



Women fish workers should have women fish worker specific schemes and allotments:

- **To make good for the relative exclusion of women fish workers;**
- **To access financial, business and technological support;**

Women fish workers should have right of preferential access to:

- **Social security schemes meant for fish workers that include housing, life and health cover, old and infirm pension, widow pension, educational support for children; - Welfare and benefit schemes meant for fish workers;**
- **Organise and run women fish workers' cooperatives, fish production groups, SHGs;**
- **Special development measures in sectors dominated by women fish workers like fish vending, canoe-based fishing, crab, mussel and weed collection etc.**
- **Provide for basic amenities like toilet, resting place and crèche for women fish workers at fish markets, fish depots and places where women fish workers gather for work.**

NPSSF 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.

NPSSF proposes that the statement, “In the same vein and following its commitment to inclusivity, the policy directives will also support the fisheries and aquaculture-related livelihoods of the Lesbian, Gay, Bisexual, Transgender, Queer and Two-Spirited and Other Identities (LGBTQ2+)” be replaced as follows to be inclusive of the terms used in India:

“In the same vein and following its commitment to inclusivity, the policy directives will also support the fisheries and aquaculture-related livelihoods of the Lesbian, Gay, Bisexual, Transgender, Queer, Intersex and Androgenous (LGBTQIA) persons”.

Institutional Credit

Regarding availability of institutional credit, NPSSF 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), NPSSF found that the layout of the schemes should be more appropriate to the requirements of small-scale fishworkers and the attitude of the financial institutions involved should also be sensitive to their needs.

NPSSF resents the proposals for ‘alternative sources of livelihoods’ for fishing communities and strongly suggests that the term should be replaced by **‘additional sources of livelihoods’** as the former appears to propose displacement from the original occupation of fish workers.



IMBL

Regarding Indian fishers crossing into neighbouring EEZ waters, NPSSFW suggests that all IMBL areas be equipped with monitoring capacity so as to issue timely warning and dissuade the Indian fishers. In addition to this, consultations with the governments and fishing communities of bordering countries should be initiated for mutual resource access and sharing.

Vessel crew and harbour-based Fish workers

A comprehensive database has to be developed regarding vessel crew and harbour-based fishworkers 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 fishworkers.

NPSSFW proposes a dedicated subsection for vessel crew and harbour-based fishworkers 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.**

NPSSFW holds that, given the proliferation of informal sector employment related to the growth of aquaculture, there is a need to regularise the working and employment conditions in the sector through necessary statutory and administrative mechanisms.

P. Fisheries Governance

NPSSFW 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 overarching principle for fisheries governance should be the recognition of the right to governance of 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.

Q. Encouraging regional cooperation

NPSSFW firmly believes and proposes that the regional cooperation in fisheries should be based on cooperation among the fishing communities of the neighbouring countries. The governments of the concerned countries should facilitate this cooperation amongst communities by undertaking the mutually complementary and conducive roles towards the benefit for the region.



Comments on Draft National Fisheries Policy 2020 –NPSSFW

Concluding comments

In preparing the above submission, NPSSFW 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. Though informal discussions on some points contained in the draft were discussed with community activists and leaders.