

DAKSHINBANGA MATSYAJIBI FORUM (DMF)

Trade Union Regn. No.20474/92.

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



Memo No. DMF/President-26/23

Date 31/08/2023

To
The Principal Secretary,
Department of Fisheries,
Government of West Bengal

Sub: Submission on the West Bengal Inland Fisheries Policy 2023

Respected Sir,

Greetings from the Dakshinbanga Matsyajibi Forum (DMF).

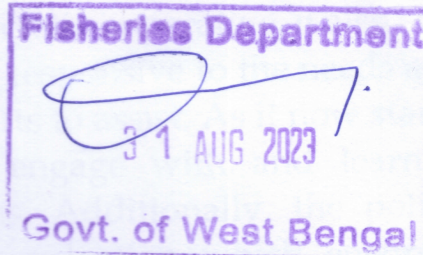
DMF, as the largest organisation of small-scale fish workers in West Bengal deems it its duty to submit its views on the inland fisheries policy published by the Department of Fisheries, Government of West Bengal.

Please consider these as our primary and immediate comments. We are eager to share our fuller concerns regarding inland fisheries policy in our interfaces with the Government in future.

Thanking you,

Yours sincerely,

Debasis Sanyal
President
Dakshinbanga Matsyajibi Forum
20/4, Sil Lane, Kolkata-700015



Milan Das
General Secretary
Dakshinbanga Matsyajibi Forum
20/4, Sil Lane, Kolkata-700015

Copy forwarded for information to –

1. The Director of Fisheries, Government of West Bengal.

Debasis Sanyal
President
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Directorate of Fisheries
Govt. of West Bengal

Milan Das
General Secretary
Dakshinbanga Matsyajibi Forum
20/4, Sil Lane, Kolkata-700015

Submission of Dakshinbanga Matsyajibi Forum on the
West Bengal Inland Fisheries Policy 2023

The Dakshinbanga Matsyajibi Forum (DMF) notes with concern the recently published West Bengal Inland Fisheries Policy 2023. Not only is fish a source of affordable and quality protein which is heavily relied upon by people within the state, it is also an indispensable source of livelihood for millions of marginalized small scale fishworkers. However, the area of inland fisheries has too long been ignored and underfunded even as cumulative crises including resource depletion, climate change, environmental pollution, and disease, have repeatedly impacted this sector. We appreciate that the government has acknowledged what we at DMF have long been saying - inland fisheries need government attention and resources for their conservation and sustainable utilization.

However, the policy as it now stands has serious issues and exclusions and we set out our serious concerns with the policy below:

Procedure

As a preliminary point, we have serious concerns about the lack of consultation with key community members and stakeholders about this policy. Discussions with stakeholders is not only a democratic imperative, it also ensures that a policy will achieve its stated goals of being responsive to the needs and demands of the fishworkers whom the policy purports to assist. As it now stands, the policy was published without any effort to engage with and learn from small-scale fishworkers and their organisations. Additionally, the policy was published online in English; a mode of promulgation which ensures that it remains inaccessible for small scale fishworkers in West Bengal. It also goes against the Government of West Bengal's policy of conducting official work in Bengali.

Exclusion

The policy directs itself as mainly being concerned with government owned waterbodies that are larger than 5 acres which are "under-utilized" and privately-owned waterbodies that are above 5 acres. This policy almost completely ignores the priority of small-scale fish workers and their collectives in inland fisheries. 'Inland Fisheries Policy' of a riverine and small water body enriched state like West Bengal has been prepared excluding not only river and reservoir fisheries, but also huge number of smaller tank and pond fisheries that provide both the bulk of fish produced and livelihood of fish workers in the inland fisheries of the state.

West Bengal has been a state gifted with large number of rivers, large and small, and the riverine fisheries. The riparian fishing communities constitute a substantial section of small-scale fish workers who fish in the rivers and in reservoirs associated with them.

The policy also ignores the fact that the West Bengal waterbodies census has recorded that just 3.4% of waterbodies in the state are publicly owned and that only 2% of the waterbodies are above 5 acres. The overwhelming majority of waterbodies in Bengal are privately owned, used for fish farming, about an acre in size and recharged annually. Large number of these water bodies are taken on lease by small scale fish farmers. There is complete silence regarding these stakeholders in the present policy. By leaving small scale fishworkers out of the policy, this document will only enable existing water lords to claim government benefits on their existing waterbodies on the one hand, and to expand their access to public waterbodies on the other.

In spite of the fact that only 3.4% of waterbodies in the state are publicly owned almost all inland fisheries cooperatives (PFCs) in West Bengal are on public water bodies. As per the Handbook of Fisheries Statistics 2015-16, there are more than 906 such PFCs, covering a total water area of 49101 hectares, with over 112647 members.

The number of such PFCs has only grown in the past 8 years to more than 1300 at present. Being larger in size and having a higher concentration of fishworkers traditionally attached to them, the social importance of government waterbodies in small scale fisheries must not be ignored.

We are alarmed that if implemented this policy might lead to a *de facto* and *de jure* privatization of public waterbodies and the exclusion of small scale fishworkers from their right to fish in these waters.

Lack of Clarity and Context

While the policy speaks of the desire to drastically enhance productivity of inland fisheries, there is little to no mention of the current state of affairs. This has serious implications – inland fisheries have a long history in West Bengal and without a thorough assessment of the present situation, it is harmful to devise remedial action and/or plan on increasing production.

- a. The number of people working in this sector, their demography, roles and incomes and on the condition and current utilization of waterbodies and fish resources in inland spaces. Without such critical baseline data, it

appears that present policy is majorly driven with the notion of **privatizing the water commons as a panacea.**

- b. Additionally, the policy is also silent as to how the target of 33 lakh MT is to be reached. When is this target expected to be reached and what is the distribution over multiple different sources (ie inland, brackish, marine)?
- c. The policy is silent as to the current legal status of the government waterbodies in question. Existing information shows that many of these waterbodies have either been already leased out or are being customarily fished by fishworkers. What will be the status of these existing leases and of those waterbodies being used as common property resources?
- d. Finally, the policy completely refrains from taking a holistic view of the inland waterbodies sector. There is no evidence that the government has seriously thought about the future and present challenges that the sector is facing and the policy does not contain any effort towards addressing the cumulative current and future stresses that this sector will face.

Critical Lacunae

Moreover, there are some serious lacunae in the text:

- a. First and fundamentally, the policy is absolutely silent on the necessity of enabling small scale fishworkers through a rights-based approach. Rather than guaranteeing small scale fishworkers' right to fish and water, the policy speaks only in the language of debt and leases; an approach that is totally antithetical to a sustainable and healthy ecological balance as well as the livelihood of millions dependent on natural resources.
- b. This policy endeavors to complete privatization of Government owned water bodies by completely obliterating the priority of small-scale fish workers in leasing. Private entrepreneurs and small-scale fish workers' collectives (cooperatives, FPGs etc.) have been placed at par (paragraph 3.1.1). The alienation of traditional small-scale fish workers from fishing rights in government water bodies will be enhanced by this policy.
- c. Critical terms are left vague and undefined. We are told, for instance, that the policy is aimed at ensuring that inland fish resources are "gainfully utilized" but the phrase is not used in conjunction with a focus on sustainability or conservation. This is worrying - as the government itself acknowledges in later paragraphs, fisheries resources have been drastically depleted and there is a longstanding demand by NPSSF and DMF that more attention

must be paid to the health and biodiversity of fish and water. Instead, the current policy is silent as to how it understands the word utilization as well as how such utilization can and must be balanced with the health of the ecosystem and the welfare of fishworkers.

- d. We are concerned that small scale fishworkers have been largely ignored under the new policy in spite of the mention that this is aimed at ensuring their social security. Much of the policy resembles an effort at a resource grab wherein private actors will be given the right to enclose critical waterbodies and exclude and alienate fishworkers from their existing uses and entitlements. This is evident in multiple places in the policy. For instance, the second paragraph states that the objective of the policy is to "create an enabling ecosystem which will trigger private sector participation". Later in the policy in paragraph 3.1.1, the government has announced its intention to issue leases through an "online bidding system" and in paragraph 3.1.7, there is a mention of bank guarantees. In light of the current levels of internet penetration and low asset ownership of small scale fishworkers, such aspects will only ensure that they are utterly excluded from being able to participate in the leasing system and be beneficiaries in this policy. The policy also does not contain any provision to specifically assist small scale fishworkers with education or extension services in relation to fish farming and production. Instead, as it now stands, the policy is likely to favour entrenched private actors with deep pockets and business interests in this state. We thus have serious concerns about both the illegality of such privatization and the fact that this will be a direct attack on the livelihoods of fishworkers who are already resisting multiple pressures. We believe that this is a violation of their right to life, occupation, and livelihood. Moreover, it is also a shirking of government responsibilities with respect to improving the living and working conditions of marginalized peoples and also violates the government responsibility to improve the health of our natural resources without seeking to privatize the same.
- e. We are also concerned with the focus on introducing new fish species (as mentioned in paragraph 2.5) without any mention of the implications for native species. Given the hugely deleterious impacts on such introduced and invasive species in many parts of the world including India, we demand that the government refrain from any short-term measures to increase fish production through introducing non-native species and conduct detailed scientific assessments prior to any such efforts;

f. We note that the subsidy amounts in the policy have been arbitrarily set – these should match the PMMSY scheme funding components and, moreover, exceed them in the context of small scale fishworkers since the capital of the amount needed to lease waterbodies is not available with small scale fishers due to the uncontrolled rise in the rent of water bodies.

Demands

In light of these critical absences with the policy, we call upon the government to:

1. Put on hold operationalization of the present 'West Bengal Inland Fisheries Policy'.
2. Immediately convene consultations with key stakeholders and especially small-scale fishworkers and other affected community members with a view to prepare a comprehensive policy document that properly addresses livelihood and natural resource access rights of small scale fishworkers and protection of the natural resources. The policy should include all inland water bodies like rivers, reservoirs, wetlands. Tanks and ponds.
3. Publish and disseminate the policy in Bengali and take it to fishworkers in all parts of the state;
4. Respond to the concerns as stated above and ensure that small scale fishworkers are the primary beneficiaries of this policy. Essentially, while efforts to increase productivity and improve the health of fisheries are welcome, the inalienable customary right of small scale fishworkers to water bodies must be recognized and adhered to.
5. The government must conduct a comprehensive survey of fisheries collective like cooperatives and FPGs with a view to ascertain the steps that are needed to ensure their efficient and democratic functioning.

SAVE WATER, SAVE FISH, SAVE FISHER PEOPLE