

NATIONAL PLATFORM FOR SMALL SCALE FISH WORKERS (INLAND)

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Dr. J. Balaji
Joint Secretary (Fisheries).
Department of Fisheries,
Ministry of Agriculture and Farmers Welfare,
Krishi Bhawan, New Delhi- 110 001.

Sub: Submission on Draft National Inland Fisheries and Aquaculture Policy.

Sir,

Greetings from the National Platform for Small Scale Fish Workers (Inland).

Please refer to the public notice issued under your memo no. F.No. 13001/1/20L6-FY inviting comments on the Draft National Inland Fisheries and Aquaculture Policy.

Our submission on the Draft National Inland Fisheries and Aquaculture Policy is enclosed.

Thanking you,

Yours faithfully,



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

Submission of National Platform for Small Scale Fish Workers (Inland) on the Draft National Inland Fisheries and Aquaculture Policy

National Platform for Small Scale Fish Workers (Inland) appreciates the diligent work of the **Technical Committee for Drafting NIFAP**, the **NIFAP Drafting Sub-Committee** and the **ICAR-CIFE Policy Research & Support Group** in drawing the Draft National Inland Fisheries and Aquaculture Policy (NIFAP).

National Platform for Small Scale Fish Workers (Inland) takes this opportunity to thank the **Government of India** in the **Department of Fisheries** under the **Ministry of Agriculture and Farmers' Welfare** for the long awaited publication of the Draft NIFAP.

National Platform for Small Scale Fish Workers (Inland) submits its comments and suggestions on the Draft NIFAP herein under.

Overview:

The small scale fishing communities are by far **the largest primary non-consumptive stakeholders and natural custodians of our water bodies and fish resources**. The small scale fishing communities are **part of the ecosystem** that provides us with rich fish resources. The Draft NIFAP's recognition of the **fundamentally important role of small scale fishing communities in protection and sustainable use of our water and fish resources** as well as in **equitable distribution of earnings** from the sector has been inadequate. The document has missed to recognise and mention the **centrality of small scale fishing communities** in ecosystem based fisheries policy and policy execution.

Comments by section:

A. Regarding section 1.1. Introduction:

This section is supposed to mention not only the achievements or prospects of the inland fisheries, **but also its main problems that necessitate the national policy**.

The **main problem** faced by the small scale fishing communities is that there is no recognition of their right over water. Policy and management of water bodies including rivers, lakes, wetlands, reservoirs, tanks and ponds are being determined and executed without the fishing communities. This deserved mention in this section.

This section has also failed to mention the sorry state of **inland capture fisheries**. Severe degradation of inland water bodies like rivers, lakes and wetlands because of pollution, consumptive use and encroachments has resulted in gross reduction of fish resources, which in its turn has caused and is causing large scale loss of livelihood of small and traditional fishing communities.

It has also failed to mention the **problem of tenure rights** faced by the small and traditional fish farmers across the country. Increased rent and / or auctioning of water bodies under public or private ownership are pushing out the small and traditional fish farmers from their livelihood practice and are replacing them with a new breed of entrepreneurs or investors.

It has also failed to mention **gender disparity** in the fisheries sector.

B. Additional points under section 1:

The Draft NIFAP has mentioned Vision, Mission and Objectives but it has not mentioned the **Guiding Principles** on which this document is to base itself. **Guiding Principles** provide fundamentally important pointers and basic tools not only to deal with present policy issues but also to address those that may come up in future. Please refer to the **National Policy for Marine Fisheries 2017** that states - **“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. These seven pillars will guide the actions of various stakeholders in meeting the vision and mission set for the marine fisheries sector of the country.”**

The Draft NIFAP should incorporate **sustainable development, socio-economic upliftment of fishers, principle of subsidiarity, partnership, inter-generational equity, gender justice and precautionary approach** as seven (7) **Guiding Principles** to determine policy issues.

C. Regarding section 1.4. Objectives:

“To ensure the Rights of small and traditional fishing communities to protect and sustainably use water bodies and fish resources” should have been mentioned as one of the main objectives.

D. Regarding section 2.1. Riverine Fisheries:

Riverine fisheries cannot be managed without fishing communities. The point no.4 should be re-written as in the following –

“4. Fishing communities should have tenure rights and right to participate in the management of riverine fisheries which has to be integral to river management. Active participation of fisheries governance including fishing communities in the management of riverine systems has to be ensured.”

E. Regarding section 2.2 Reservoir Fisheries:

Local fishing communities must have participatory right to manage reservoir fisheries. As such the point no. 1 under this section should be re-written as in the following –

“1. The management of fisheries in all manmade reservoirs needs to be transferred to the State Fisheries Department(s)/Agencies who in turn will bring such open water bodies under scientific fisheries enhancement programmes and efficient governance framework that **includes participation of local fishing communities and ensures their tenure rights.**”

Cage culture has two main associated problems – a. It may degrade the quality of reservoir water through intensive culture and thus degrade the fish resources in open reservoir waters; and b. It requires investments to establish and maintain cage culture which is beyond the capacity of local fishing communities and thus would replace them with fisheries entrepreneurs and investors. In view of this point no. 2 under this section should be rewritten as in the following –

“2. Measures for promotion of cage culture in reservoirs are to be based on recommendations of scientific organizations like ICAR Institutes, Universities, etc. and the Department of Fisheries,

Government of India and should **ensure maintenance of water quality and fish resources of open reservoir waters as well as exclusive ownership of the local fishing communities.**"

The livelihood rights of the small and traditional fishing communities in protected areas have to be ensured. In this regard the following policy statement of NPMF may be referred –

"Simultaneously, the Government will also undertake review and periodic evaluation of the existing marine protected areas (MPAs) and for providing legislative support to ensure that tenure rights of the traditional fishermen are secured and their livelihoods not impacted by such conservation measures."

In view of this point no. 5 under this section should be rewritten as in the following –

"5. Tenure rights of the traditional fishermen are to be secured and their livelihoods should not be impacted by such conservation measures as sanctuaries or reserves. Issues related to fishing in reservoirs within the jurisdiction of areas declared as sanctuaries/reserves by Ministry of Environment, Forest and Climate Change needs to be resolved by the State/UTs through consultation to balance ecological, food and fishers livelihood needs and ensure optimum utilization of resources **with the participation and informed consent of the small and traditional fishing communities.**"

F. Regarding section 2.3 Natural Wetlands:

Fisheries of the Natural Wetlands cannot be managed without fishing communities. There should be an additional point under 2.3.1. d) as in the following –

"d) Fishing communities should have participation rights in the governance and management of natural wetland fisheries which has to be integral to natural wetland management."

G. Regarding section 2.3 Coldwater Fisheries:

In the Himalayan and North-Eastern states there are fishing communities and/or communities who fish for livelihood. The participation of these communities in policy preparation and management of fisheries is essential. As such the point no., 1 under this section should be rewritten as in the following –

"1. Policies and legislation along with development and conservation programmes need to be put in place for developing fisheries in Himalayan and North Eastern States **with participation of local fishing communities or communities engaged in fishing for livelihood.**"

H. Regarding section 2.5 Recreational Fisheries:

It should be rewritten as –

"Appropriate sustainable models of recreational fisheries and ecotourism enterprises need to be developed and promoted by the States/UTs **in consultation with and participation of local fishing communities** and the private sector within the existing regulatory framework and guidelines."

I. Regarding section 3.1 Aquaculture Development:

The security of tenure of small scale fish farmer communities on both public and private water bodies has to be ensured. Auctioning of public water bodies and steep rise in lease rents of both public and private water bodies are evicting the small scale fish farming communities and replacing them with a new breed of entrepreneurs from outside the fishing communities. Fishing communities' livelihood cannot and should not be auctioned. The small scale fish farmers' tenure rights on private water bodies should also be protected. As such there should be an additional paragraph under this section as in the following –

“The inalienable livelihood rights of small and traditional fish farmers on public and private water bodies should be ensured. This means that active fish farmers should have permanent tenure rights on public water bodies. Fish farmers should also have legally recognised security of tenure on private water bodies (ponds, tanks) farmed by them. Appropriate legislations are to be put in place in this regard.”

Unregulated proliferation of intensive prawn aquaculture in coastal areas is causing environmental and ecological disaster for riverine, estuarine and coastal fisheries. This should be addressed with strict regulatory measures and administrative compliance. As such the point no. 9 should be re-written as in the following –

“9. Spurt in growth of cage culture in open water resources and intensive shrimp/prawn farming in inland saline and freshwater areas with entailing environmental and ecological fall outs warrant a strict regulatory framework and appropriate compliance for inland aquaculture by State Authorities on the lines of Coastal Aquaculture Authority (CAA). Traditional and improved traditional methods of aquaculture are to be encouraged.”

Regarding section 3.3 Introduction and regulation of exotic species:

Extreme caution and precautionary principle should be adhered to ensure that no harm is done to the local fish stock and ecology by the introduction of exotic species. It is also necessary to revisit the existing regulatory framework in this regard. As such the section no. 3.3 should be re-written as in the following –

“Extreme care and precautionary principle should be adhered to ensure that no harm is done to the local fish stock and ecology by the introduction of exotic species. There should be adequate strengthening and strict compliance of National Laws/ Rules for import, breeding and farming in this regard.”

J. Regarding section 4.1 Post-harvest, marketing and value addition:

For small fish vendors the issues are finance, transportation, cold chain maintenance and markets with proper facilities. The government should come out with effective and adequate measures to look after these. Special drive should be taken to develop markets with facilities. As such the point no. 2 under this section should be re-written as in the following –

“2. Small fish vendors across the country should be provided with access to finance, transportation, cold chain maintenance and markets with proper facilities. They should be protected against eviction from designated and un-designated market places without informed consent and rehabilitation.”

K. Regarding section 4.5 Institutional finance:

An important problem encountered by the small scale fish farmers across the country in accessing institutional finance is the lack of proper lease holding titles in their possession. Large number of small scale fish farmers will be unable to access institutional finance if this is not addressed. As such the point no. 1 under this section needs to be rewritten as in the following –

“1. Benefits of institutional finance like credit, insurance, etc. provided to agricultural farmers may be extended to fishers and fish farmers as well. In this actual fishing or fish farming undertaken by concerned fisher and fish farmer certified by DoF officials should be considered.”

L. Regarding section 4.6 Fishers and farmers welfare:

There should be comprehensive social security net for the small scale fishing communities. As such the section 4.6 should be rewritten as –

“4.6. Comprehensive social security including life and health cover, old age and infirm pension, housing, children’s education should be provided. Towards this current welfare and social protection programmes may be further strengthened to provide enhanced safety net to all categories of formal and informal inland fishers, fish farmers, fish workers and their families in convergence with other similar schemes.”

M. Regarding section 4.7 Governance and Institutions - Water use and Management:

The water allocation for fisheries should be adequate and not ‘minimal’. The point no.1 under this section should be rewritten as –

” 1. The present National water policy, 2012 clearly recognizes the use of water for basic human requirements as part of right to life and livelihood. Its scope needs to be enlarged to clearly recognize the adequate right to water for fisheries and aquaculture having non-consumptive water usage.”

N. Regarding section 4.7 Governance and Institutions - Leasing of public water bodies for aquaculture:

Small scale fishing communities living near public water bodies and involved in livelihood practice on the public water bodies should have inalienable right to pursue their livelihood practice on the concerned water bodies. Livelihood of the fish workers should not and cannot be auctioned. As such the section under 4.7 Governance and Institutions - Leasing of public water bodies for aquaculture should be re-written as in the following –

“Leasing of public water bodies for aquaculture:

States will be encouraged to develop comprehensive leasing and licensing guidelines for all public water bodies to ensure the inalienable right of the fishing communities living near the concerned water bodies to pursue their livelihood practice on those incorporating the concerns for resource development, welfare and revenue generation etc. The guidelines will also suggest a minimum lease period in the range of 7-10 years with periodic review and the minimum lease value be determined on scientific principles, equity and long term sustainable resource utilization.”

O. Regarding 4.8 Fisheries cooperatives:

The fisheries cooperatives across the country have been, in great majority of the cases, usurped by people with vested interests and/or lying defunct. The genuine fishers and fish farmers are alienated and have no role to play in these cooperatives. There is an urgent need to reform and reconstitute fisheries cooperatives to turn them into thriving business entities owned and participated by fishing communities. As such the section under 4.8 Fisheries Cooperatives should be re-written as in the following –

“4.8 Fisheries cooperatives:

Fisheries cooperatives require to be reformed and/or reconstituted with a view to turn them into thriving business entities owned and participated by fishing communities and practicing good governance, transparency and accountability in their functioning.

P. Regarding section 4.10 Strengthening of inland fisheries and aquaculture database:

For fisheries policy preparation and execution database of necessary information is indispensable. It is necessary to prepare and regularly update databases on water bodies, fish resources, fish workers, fish markets etc. The section under ‘4.10 Strengthening of inland fisheries and aquaculture database’ should be rewritten as –

“Census at regular intervals on inland fisheries and aquaculture covering water bodies, fish resources and production, fish workers, fish markets etc. needs to be undertaken to obtain comprehensive picture of production including resource usage and users through appropriate mechanisms. Care should be undertaken to ensure authenticity of the database.”

Q. Regarding section 4.11 Gender and equity:

Certain measures are important to ensure Gender Justice or Equity in the fisheries sector. These include – a. Gender segregated data on women fish workers; b. Gender budgeting to provide adequate allocation for women fish workers and sectors dominated by them; c. Women fish worker specific schemes to provide comprehensive assistance and welfare to them; and d. Women fish workers’ priority in general schemes for assistance and welfare to fish workers. As such the section under 4.11 Gender and Equity should be re-written as –

“Gender mainstreaming as well as equity needs to be made integral part across the value chain. Empowerment of women and strengthening their organization and leadership capabilities will receive adequate attention. This may be facilitated by –

a. Gender segregated data on women fish workers; b. Gender budgeting to provide adequate allocation for women fish workers and sectors dominated by them; c. Women fish worker specific schemes to provide comprehensive assistance and welfare to them; and d. Women fish workers’ priority in general schemes for assistance and welfare to fish workers.”

R. Regarding implementation of NIFAP and resolving disputes:

There is a need to constitute a **National Commission on Fisheries** with strong **MCS mechanism** to look after the implementation of NIFAP including protection of the rights and entitlements of the small scale fishing communities, resolve inter-state disputes and take up cross border issues with appropriate authorities.