

Coastal Regulations in India: From Protection to Destruction

National Fishworkers' Forum
July 2018

The National Fishworkers' Forum (NFF) is the longest standing confederation of traditional and artisanal fishworkers in the country and has emerged as the united platform, strength and voice of the small and traditional fisher people of the country since 1985. It has taken upon itself the task of protecting the life and livelihood of the fishing communities together with the fisheries resource base. NFF owes its birth to the striving of the Indian fishing communities to develop from a community in itself to a community for themselves. And the history of NFF is the history of the struggle of the Indian fishing communities.

Cover & Layout: Musthujab Makkolath (Media Collective)

Published by the National Fishworker's Forum
July 2018

For Private Circulation Only

For copies contact:
F-10/12, Basement
Malviya Nagar, New Delhi – 110017
Ph: 011-26680883/011-26680914
Email: nffdelhioffice@gmail.com , nff@nffindia.org

Contents

| | |
|--|----|
| Preface..... | 4 |
| A timeline of Coastal Regulations in India: NFF's Engagement..... | 6 |
| National Fishworkers' Forum's Submission to the MOEFCC in response to the Draft CRZ Notification 2018..... | 13 |
| Part 1: Objections and Demands from the fishing communities represented by the NFF..... | 17 |
| Part 2: Comments on the draft..... | 21 |
| Part 3: A importance of retaining and correctly implementing the CRZ 2011..... | 35 |
| NFF's response to the MOEFCC with regards to the latest amendment to CRZ Notification 2011..... | 47 |
| Questions for Consideration: Honourable Parliamentarians to raise in the House..... | 51 |
| Office Bearers of NFF..... | 60 |

Preface

On the 18th of April 2018, the Ministry of Environment, Forests and Climate Change (MoEFCC) published the Draft Coastal Regulation Zone Notification 2018 (CRZ 2018), inviting comments/suggestions/views within a period of 60 days from its publication. Even before these comments could be analyzed, the MoEFCC introduced another amendment on the 2nd of July 2018 to the CRZ 2011, this time under the clause of “Public Interest”. What is unprecedented in India’s history, both these changes to coastal regulations have deliberately omitted consultations with the fishworking community- India’s largest, non-consumptive coastal stakeholder.

The publishing of the draft CRZ 2018 and the amendments of the CRZ 2011 have only reinforced National Fishworker Forum’s belief that coastal regulations can no more be left to the discretion of the Executive. The Executive continues to play around with the regulations, diluting them in parts through amendments and in entirety through new notifications.

The National Fishworkers’ Forum (NFF), India’s largest non-political fishworker representative has responded to the MoEFCC, after taking action on the recent changes to coastal regulations. This booklet is a compilation of our submissions made to the MoEFCC.

With regards to the draft CRZ 2018, the submission is in three parts as below:

- Part 1: Objections to the draft CRZ 2018 notification and Demands made in lieu
- Part 2: Comments on the draft CRZ 2018 notification
- Part 3: A re-visit of the negotiating process of the CRZ 2011 notification

With regards to the amendment to the CRZ 2011, the NFF has submitted a letter to the Secretary of the MoEFCC a copy of which is also reproduced.

The submissions made by the NFF act as an important reminder of what the country stands to lose should the CRZ 2011 notification be superseded by the

draft CRZ 2018 notification, and/or the CRZ 2011 notification continue to be diluted. The CRZ 2011 process guarantees not only environmental protection and livelihood security, but also serves as a reminder of the robust democratic processes and engagements it followed in its implementation. As such it provides a comparison to the shoddy, non-consultative, anti-fishworker process of the draft CRZ 2018, as well as to the recent manner in which the CRZ 2011 has been amended.

The implementation of the CRZ 2011 remains far from satisfactory. While the failure to implement the CRZ 2011 rests squarely with the MoEFCC and the State Governments, the relevance of CRZ-2011 is still high. The activities for which implementation is yet to start need to be taken up on a war footing. Activities where the implementation has started, but is behind schedule, have to be systematically completed. It is therefore a matter of serious concern that the MoEFCC is planning to throw the CRZ 2011 overboard and start afresh through the Draft CRZ 2018.

On the 7th of January 2011, the MoEFCC, while introducing the new CRZ 2011 notification, had promised to honour the NFF's demand of a comprehensive coastal rights bill. However, with the recent actions of the Executive, the time has once again come for the Parliament to respond to the long-standing demands and introduce a strong pro-community and pro-environment law to replace this destructive piece of coastal regulation notification.

'Coastal Regulation: From Protection to Destruction- Interaction with Parliamentarians' has been organized in Delhi during the Monsoon session of the Parliament 2018 with the very intent to advance the demands for an act to protect the coastline of India, as well as the livelihoods dependent on it.

-National Fishworkers' Forum

A timeline of Coastal Regulations in India: NFF's Engagement

1981-88:

- On the 27th November, 1981 PM Indira Gandhi writes to the state and union territories authorities expressing concern on the degradation of India's beaches and urges them to give thought to the matter to ensure that India's coastline and its beaches remain unsullied.
- A Working Group is constituted in 1982 to act on this letter.
- In July 1983, the Department of Environment (which later became the Ministry of Environment & Forests) frames the "Environmental Guidelines for Development of Beaches".
- In March 1984, a set of guidelines for development of beaches are circulated to all states and Union Territories.
- The National Fishworkers Forum (NFF) registers under the Trade Union Act of India in 1985.
- The Environment Protection Act is passed in 1986.
- A progressive and environmental set of Environmental guidelines for locating industries, thermal plants, hotels and public sector projects is developed.

1989:

In March 1989, the NFF organizes a coastal yatra of around 25,000 NFF members, one of the first steps by the fishing community demanding a set of laws to protect the coastal areas of India. With the slogan to "Protect Water, Protect Life", one group marched from West Bengal to Kanyakumari, Tamil Nadu and another group from Kutch, Gujarat to Kanyakumari. While the 'Kanyakumari March' culminates at Kanyakumari with bullets being fired at and injuring 21 fishworkers, it brings the issues of coastal conservation and the relationship of natural resources to traditional communities to national attention. This in turn gives momentum to the movement to protect India's coasts via a specific legislation.

1990:

The MoEF carries out an in-house consultation and issues a draft Coastal Regulation Zone (CRZ) Notification twice inviting suggestions and objections from public on 27th July, 1990 and 15th December, 1990.

1991:

On 19th February, the MoEF issues the Coastal Regulation Zone 1991 notification under the Environmental Protection Act, 1986.

1996:

In December, 1996 the SC orders all the state governments to submit a Coastal Zone Management Plan (CZMP) based on the CRZ Notification, 1991 and asks the coastal states to implement the CRZ notification. This judgement also paves the way for the formation of Coastal Zone Management Authorities (CZMA) at the national and state level.

1998:

The NFF commissions a survey in 1998 to map the CRZ violations along the east and west coast.

2005-2007:

- Until 2005, the CRZ notification 1991 gets amended twenty-one times, with each amendment diluting the protection the notification offered.
- Post the tsunami in 2004, the coastal areas of India undergo widespread destruction and a renewed attempt is made to review the CRZ notification. The MoEF sets up an Expert Committee under the chairmanship of Prof.M.S. Swaminathan to review the CRZ notification, including the amendments.
- Members of NFF, environmentalists and civil society organisations begin to agitate against the recommendations of the M. S. Swaminathan Committee to replace the CRZ 1991 by a Coastal Management Zone Notification. This is done on grounds of the absence of participatory planning, lack of consent and the capture of regulatory process.

- Between 2005 and 2006 several mass protests are organised along with petitions and letters of protest.
- Responding to a leaked draft of CZM, fresh waves of protests begin. The National Coastal Protection Campaign (NCPC) is formed to bring all the concerned organizations together under one umbrella.
- The 'National Campaign against CZM Notification' is launched on the 9th August, 2007 to coincide with the anniversary of the Quit India Movement.
- The NFF launches another massive protest on 21st November 2007, the World Fisheries Day.

2008-2011:

- On 1st May, 2008 the NFF launches the 'Machhimar Adhikar Rashtriya Abhiyan' (National Campaign for Fisherworkers' Rights) with the motto "Save the Coast, Save the Fishers".
- The campaign is conducted along all the coastal states and union territories on mainland India.
- The CZM, 2008 is made available to the public against which there is wide spread opposition. The draft Notification is rejected by fisherfolks' organisations as well as environmental NGOs.
- Between 2009 and 2011, a series of exchanges were conducted between the MoEF and the fishing communities, along with an active campaigning by the National Fishworkers Forum and allied groups. (See Part 3 of NFF's submission to the MoEFCC for details on this engagement)

2011:

On the 7th January, the Coastal Regulation Zone Notification, 2011 is issued under the Environmental Protection Act, 1986. This notification supercedes the CRZ 91, as well as codifies all twenty-five amendments made to it.

- CRZ 2011 mandates the preparation of a new Coastal Zone Management Plan and issues guidelines for preparation of the plan.
- For the first time, the CRZ 2011 recognises fisher people's rights over coastal commons on land and sea/river and asks for the demarcation of

land use and community infrastructure on the CZMP, so those uses can be prioritised.

- CRZ 2011 also takes into account the widespread degradation of the coast after the tsunami and introduces the addition of a Hazard Line, regulating development within areas vulnerable to hazards due to climate change and sea level rise

2013:

Coastal Zone Management Plans are introduced under the CRZ 2011 and released for public comments. In some states, like Tamil Nadu, the plans did not follow the guidelines and were incomplete and inaccurate. Fishworker protests led to the withdrawal of the plans.

2014:

The Shailesh Nayak Committee is formed to review the CRZ 2011 notification.

2016:

- The Shailesh Nayak Committee submits its recommendations. The Shailesh Nayak Committee does not meet any representatives of the fishworking communities, the largest non-consumptive stakeholder of India's coastline.
- CZMP not finalized even six years after notification of CRZ 2011. However, notification amended over ten times to dilute existing protections.

2017:

- The MoEFCC releases the draft Marine Coastal Regulation Zone, 2017 notification internally, but never in the public domain.
- On the 22nd November the National Green Tribunal passes an order directing that all states must file the draft of their CZMPs under CRZ, 2011 by 30th April, 2018. In addition, it directs the MoEFCC to approve the Hazard Line marking and the CZMPs by the 31st July, 2018. It also directs that the MoEFCC not grant any Environmental Clearances for

development activity within the CRZ areas until the updated CZMPs are prepared.

2018:

- MoEFCC releases new CZMP under CRZ 2011 prepared using High Tide Line (HTL) by National Centre for Sustainable Coastal Management for states like Tamil Nadu, Karnataka, Maharashtra, Gujarat, etc. Maps remain incomplete and fall short of guidelines issued by the notification. Public hearings are met with large protests.
- On the 18th April, the MoEFCC publishes Draft Coastal Regulation Zone, 2018 notification for comments. This relaxed all restrictions on setting up "Strategic", "Defence" and "Public Utility" projects on ecologically sensitive areas and reduced the Hazard Line to being a tool in city/town planning rather than a determinant set-back line.
- On the 21st May, the NFF organises a national consultation on the Draft CRZ 2018 notification.
- On the 11th June, the NFF observes a National Day of Protest against the Draft CRZ 2018 notification with the slogan: **"Restore our coastline, secure our livelihoods"**.
- On the 2nd July, the MoEFCC amends the CRZ 2011 for the sixteenth time. This amendment removes all administrative powers of the Hazard Line, as well as opens up the eco-sensitive areas of the CRZ to projects related to defence organisations.



From NFF archives



National Fishworkers' Forum (NFF)

(A Federation of State Level Trade Unions in India)

Reg. No. 487/85 Email : nff@nffindia.org, Website : www.nffindia.org



Administrative Office :

NFF, The SFSS Soc. Ltd.,
Post - SATPATI, Tal & Dist. Palghar
PIN - 401405, Maharashtra
Tel./Fax : 02525224142

Registered Office :

NFF, Cherureshmi Centre
Valiyathura P.O., Trivandrum
PIN - 695008, Kerala
Mob : 08289905293

Central Office :

NFF, 20/4, Sil Lane
Kolkatta - 700015,
West Bengal
Tel/Fax : +913323283989

Delhi Office :

NFF
F10/12, Malvia Nagar
New Delhi - 110017
Tel : 01126680883

Chairperson :

Narendra R. Patil

Email: rpatilnarendra@gmail.com, Mobile: 09923241641

General Secretary :

T. Peter

Email : peter.ksmf@gmail.com, Mobile : 08289905239

Date: 14th June, 2018.

To: Mr. Harsh Vardhan,
Union Minister, Ministry of Environment, Forests and Climate Change
J-615, Jal Block, Indira Paryavaran Bhawan,
Jor Bagh Road,
New Delhi — 110003

CC: Mr. Arvind Nautiyal
Director, Ministry of Environment, Forests and Climate Change
J-615, Jal Block, Indira Paryavaran Bhawan,
Jor Bagh Road,
New Delhi — 110003

14/6/18
श्री. अ. व. वार्धन द्वारा प्राप्त किया
Received by DCS Section
पर्यावरण, वन और जल विभाग
Ministry of Environment, Forests & Climate Change
भारत सरकार/Govt. of India
इन्दिरा पार्यावरण भवन/Indira Paryavaran Bhawan
जोरबाग रोड, अलिपय/ Jorbagh Road, Alipay
नई दिल्ली/New Delhi-110003

Subject: **National Fishworkers' Forum's unanimous rejection of draft Coastal Regulation Zone Notification, 2018 and the wrong processes being followed by the MoEFCC**

Sir,

Please refer to the Public Notice bearing No. F.No. 19-112/2013-1A-II dated 18/04/2018- inviting comments/suggestions/views on the Draft Coastal Regulation Zone Notification 2018 within 60 days from 18/04/2018.

We write to you on behalf of the National Fishworkers' Forum (NFF), the longest standing confederation of traditional and artisanal fishworkers in the country. NFF came into existence in the late 1970s, much before the Government of India translated the need for a Ministry of Environment and Forests, in the context of the need of unified community voices to protect the marine, coastal ecosystem, the livelihood of the fishing community as well as the marine sovereignty of the country. The history of NFF interventions, under the able leadership of stalwarts like Thomas Kocherry, Harekrishna Debnath, Bhai Bandarkar, Matanhy Saldanah, Rambhau Patil, N.D. Koli, and so on led to the formulation of the CRZ, the Murari Committee recommendations, the Majumdar Committee, etc. and to vibrant pro-environment and pro-community legislation and implementation of policies in the Indian coastland and marine areas. It goes without saying that the NFF has single-handedly played the most important role in the history of protecting Indian coastline, being the non-political party representative forum of fishing communities.

The history of confrontations we have had is also important to mention here. At times, when the Governments of the past have not listened to the voices of fisher and other coastal people- such as during the 2008 draft CMZ notification, the Meena Kumari Committee report or the many efforts at dilution of the CRZ 1991 and CRZ 2011- NFF has made sure that the democratic government of the day was compelled to heed to the voices of the affected people, the primary stakeholders.

1

Copy of NFF's submission on draft CRZ Notification 2018

NFF's Submission to the MOEFCC in response to the Draft CRZ Notification 2018

Date: 14th June, 2018

To: Mr. Harsh Vardhan,
Union Minister, Ministry of Environment, Forests and Climate Change
J-615, Jal Block, Indira Paryavaran Bhawan,
Jor Bagh Road,
New Delhi - 110003

CC: Mr. Arvind Nautiyal
Director, Ministry of Environment, Forests and Climate Change
J-615, Jal Block, Indira Paryavaran Bhawan,
Jor Bagh Road,
New Delhi - 110003

Subject: National Fishworkers' Forum's unanimous rejection of draft Coastal Regulation Zone Notification, 2018 and the wrong processes being followed by the MoEFCC

Sir,

Please refer to the Public Notice bearing No. F.No. 19-112/2013-1A-II1 dated 18/04/2018- inviting comments/suggestions/views on the Draft Coastal Regulation Zone Notification 2018 within 60 days from 18/04/2018.

We write to you on behalf of the National Fishworkers' Forum (NFF), the longest standing confederation of traditional and artisanal fishworkers in the country. NFF came into existence in the late 1970s, much before the Government of India translated the need for a Ministry of Environment and Forests,

in the context of the need of unified community voices to protect the marine, coastal ecosystem, the livelihood of the fishing community as well as the marine sovereignty of the country. The history of NFF interventions, under the able leadership of stalwarts like Thomas Kocherry, Harekrishna Debnath, Bhai Bandarkar, Matanhy Saldanah, Rambhau Patil, N.D. Koli, and so on led to the formulation of the CRZ, the Murari Committee recommendations, the Majumdar Committee, etc. and to vibrant pro-environment and pro-community legislation and implementation of policies in the Indian coastland and marine areas. It goes without saying that the NFF has single-handedly played the most important role in the history of protecting Indian coastline, being the non-political party representative forum of fishing communities.

The history of confrontations we have had is also important to mention here. At times, when the Governments of the past have not listened to the voices of fisher and other coastal people- such as during the 2008 draft CMZ notification, the Meena Kumari Committee report or the many efforts at dilution of the CRZ 1991 and CRZ 2011- NFF has made sure that the democratic government of the day was compelled to heed to the voices of the affected people, the primary stakeholders.

We are forced to reiterate this history at a time when we are made to feel that the Government of India does not feel it important to consult the fishing community and its legitimate representatives, while formulating the most important piece of policy meant to protect the coastal lands and secure our livelihoods – the Coastal Regulation Zone Notification. We are writing this letter to you, most humbly so, to remind the government about this fatal flaw in such a process and to reiterate our position and demands.

The coasts of India are undergoing a radical revisualisation under the Sagarmala programme which places ports, coastal shipping traffic, economic zones, power, petroleum and manufacturing plants along India's already-stressed 7500 kilometre coastline. We are aware that this massive 8 lakh crore project cannot be implemented under existing coastal regulations which guarantee traditional and customary rights to fishworkers, as well as contain numerous

prohibitions on environmentally polluting industries.

The NFF unanimously rejects the Draft CRZ Notification 2018 and seeks its withdrawal. This exercise has only reinforced NFF's belief that coastal regulations can no more be left to the discretion of the Executive, which continues to play around with the regulations, diluting them in parts through amendments and in entirety through new notifications. It is high time that the Parliament brought a strong pro-community and pro-environment law to replace this weak piece of regulation.

In addition, the failure to implement the CRZ 2011 rests squarely with the MoEFCC and the State Governments. The relevance of CRZ 2011 is still high. The activities for which implementation is yet to start need to be taken up on a war footing. Activities where the implementation has started, but is behind schedule, have to be systematically completed. It is therefore a matter of serious concern that the MoEFCC is planning to throw the CRZ 2011 overboard and start afresh through the draft CRZ 2018.

We enclose our submission in response to the draft CRZ 2018 in 3 parts:

- In Part 1, we cite our objections to the draft CRZ 2018 and present the demands of the NFF.
- In Part 2, we offer our detailed comments on the draft CRZ 2018.
- In Part 3, we re-visit our negotiations with the MoEFCC between the years 2007-10. This is to provide a comparison to the shoddy, non-consultative, anti-fishworker process of the draft CRZ 2018.

We are hoping that the non-consultation by the MoEFCC of the biggest stakeholder in the issue, the traditional artisanal fishing community in India, is an executive error – and not a deliberate political one. We hope these submissions made by the NFF will be reason enough to review the approach process involved in drafting of the CRZ 2018. NFF will be happy to collaborate with Government's efforts and consultations to make any new coastal or fisheries related policies or laws.

Yours sincerely,

Narendra R Patil (Maharashtra)
Chairperson
(Mob. No: 99232-41641)

T Peter (Kerala)
General Secretary
(Mob. No: 82899-05239)

Affiliates of the National Fishworkers Forum:

Machimar Adhikar Sangharsh Sangathan(MASS - Gujarat)- Usmangani Sherasiya- 09427443976

Maharashtra Machimar Kruti Samiti (MMKS) (Maharashtra)- Kiran Koli- 09702265813

Shramik Macchimar Kriti Samiti (Maharashtra)- Ravikiran Toraskar- 09225900303

Goenchea Ramponkarancho Ekvott (GRE- Goa)- Olencio Simoes- 09158875851

Coastal Karnataka Fishermen Action Committee (Karnataka)- Vasudev Boloor- 09449207805

Kerala Swathanthra Malsyathozhilali Federation (KSMTF- Kerala)- Jackson Pollayil- 09349447166

Ramnadu District Fishworkers Union (Tamil Nadu)- Paul Samy- 09442322393

Vangakadal Meen Thozhilalar Sangam Tamilnadu (Tamil Nadu)- Dr.Kumaravelu- 09442867035

Democratic Traditional Fisher's and Fish workers Forum (Andhra Pradesh)- Debashish Pal-
08555809779

Orissa Traditional Fish Workers Union (Odisha)- K. Allaya- 09437069286

Dakshinbanga Matsyajibi Forum (DMF – West Bangal)- Millan Das078724-07611

NFF's response to the Draft CRZ Notification 2018

Part 1: Objections and Demands from the fishing communities represented by the NFF

1. Objections

We have serious objections to the new notification in view of its timing, process and content.

Timing

- The CZMPs under the CRZ 2011 are being seriously discussed across the coast, and an attempt to change the regulations at this stage smack of mala-fide intentions. Instead of correcting the failures of the current exercise and coming back with more comprehensive CZMPs incorporating the missing elements, the new draft notification seems to be an attempt to divert the attention and energies of fishing communities and coastal activists who are carefully scrutinising the CZMPs in parts of the coast. That the CZMPs can be revised to meet the new regulations without any further public consultation indicates that the MoEF is not serious about getting sound CZMPs but wishes to by-pass the primary stakeholders-the fishworkers.

- The failure to publish the hazard line for public viewing, its absence in the CZMPs and the complete jettisoning of the hazard line in the draft CRZ 2018 once again creates suspicion of mala-fide intentions. Is the un-published hazard line, a hazard for business interests? With a recent court judgement insisting on the hazard line as an essential requirement for the CZMPs, the change in the regulations themselves seem to be an attempt to escape using the hazard line. NFF strongly objects to this.

- When CRZ 2011 was being negotiated, some kind of a balance between environmental interests and "development" interests was

achieved. Today, the development-motives have become much more aggressive and want the coast for much bigger investments. Mega Programmes like the Sagarmala cannot come up unless coastal regulations are practically eliminated seems to be the line of thinking. The proposed jettisoning of the CRZ 2011 and replacing it with a much weaker CRZ 2018 seems to indicate this.

Process

- The robust process behind the formulation of CRZ 2011 is completely absent in the formulation of the draft CRZ 2018. It is extremely objectionable that there was no pre-draft document available for comment. Public consultations to take in views before formulation of the draft were totally absent. The MoEFCC is merely using the limited process of the Shailesh Nayak Committee to claim that stakeholder consultation was undertaken.

- The Shailesh Nayak committee consulted only state Governments, central Ministries and perhaps private sector agencies. It did not think it fit to consult the numerically largest stakeholder group on the coast: the fishing communities. When the previous notification involved such a deep involvement of fishing communities, how could the Shailesh Nayak committee make recommendations without even an attempt to contact us? These only confirm the suspicion that there is a deliberate attempt to side-line and marginalise the fishing communities for this process. Further dilution of coastal protection will not be easy if the fishworkers get involved. This will not suit the current agenda of the Government.

- The entire process is made inefficient by an obvious attempt to make changes in an important environmental regulation without proper justification or adequate consultation. The 60-day window to take in public views is grossly inadequate when the stakes are so high for a 4 million strong fisher population. Even local language access to the draft regulation is absent. English can be read with full comprehension by a

very small segment of the fishing community. The ministry will do well to remember that Hindi is not the mother tongue of even one coastal fishing community in India.

Content

- The content of the draft regulation is clearly a gross dilution of the existing CRZ 2011 in terms of protecting the coastal eco-system and fishing community livelihoods. We discuss this in more detail in the Part 2 of this submission.

2. Demands

We unanimously reject the Draft CRZ Notification 2018 and seek its immediate withdrawal. Taking into consideration, the various developments taking place in connection with the CRZ currently, we make the following demands to the MoEFCC and the Government of India.

1. Withdraw the Draft CRZ Notification 2018 as there is no strong justification to replace the existing CRZ Notification 2011. We discuss this in Part 3 of this submission.
2. Withdraw the CZMPs put up under CRZ 2011, as they are incomplete and erroneous.
3. Review the HTL and undertake ground-truthing with the help of local communities and compare with 1991 maps and pictures.
4. Finalise the Hazard Line and put it up for public review keeping in mind regional specifics.
5. Start the process of mapping of coastal fishing villages as per guidelines provided in CRZ 2011, with the cooperation of the fishing communities around the coast.
6. Educate coastal communities about the CRZ and CZMPs in collabora-

tion with fishworker associations and civil society organisations.

7. Correct and complete the CZMPs after adding the fishing villages and the Hazard line.

8. Conduct fresh public hearings with the revised CZMPs.

9. Conduct elaborate consultations with all relevant stakeholders, especially the fisher community, to develop a new legislation on the CRZ and place it in the Parliament.

10. Draft a comprehensive land rights recognition legislation for coastal India, keeping in mind the historic injustice of land rights of traditional fishing and other coastal dwelling communities, which remains an unsettled agenda since independence.

NFF's response to the Draft CRZ Notification 2018

Part 2: Comments on the draft

1. New definitions and new boundaries

Though CRZ 2018¹ maintains the existing zone nomenclature of CRZ I, II, III and IV, it has made subtle changes in defining these zones and bringing new sub-divisions to these zones. These are some of the important changes and their implications:

| Zone | Changes | Implications |
|---------|--|--|
| CRZ | While landward boundary from the sea front remains 500 m, the CRZ boundary for creeks reduced from 100 m to 50 m on either side. | Reducing the “buffer zone” beside creeks. Will increase risks associated with flooding and changes in creek shorelines |
| CRZ I A | Though the definition remains broadly the same, the suggestion of mapping by NCSCM raises the question of whether the actual CRZ I areas will change from earlier CZMP maps of 1996? | Not clear |
| CRZ I B | Boundaries remain same | |

¹ For convenience we mention CRZ 2018, when we actually mean Draft CRZ Notification 2018.

| Zone | Changes | Implications |
|-------------|---|---|
| CRZ II | Now all CRZ areas within Municipal limits will become CRZ II, while earlier some areas were CRZ III. In "other legally designated urban areas", the earlier concept of "substantially built up area" has been quantified as "with a ratio of built up plots to that of total plots being more than 50%. | CRZ II area will increase with a reduction in CRZ III areas. This will bring more area under the lowest level of environmental regulation. |
| CRZ III | Bifurcated into CRZ III A and B, based on population density of above and below 2161 per sq.km as per 2011 Census. NDZ will be reduced from 200 m to 50 m in CRZ A while it will remain 200 m in CRZ B. | An overall reduction in NDZ area will reduce level of protection to coast and increase vulnerability of local populations. |
| CRZ IV | No change in definition or boundaries | |
| Hazard line | CRZ 2011 includes the area between the hazard line and the 500 m line for seafront area and 100 m for creek front area as part of the CRZ regulation but does not give it any specific nomenclature. CRZ 2018 drops this completely | No plans to regulate the area landward of the CRZ area upto the hazard line. The concept of vulnerability to natural hazards and climate change given up leaving lives, livelihoods and public infrastructure exposed to their impacts. |

| Zone | Changes | Implications |
|---------------------------------|---|---|
| Areas for special consideration | <p>This category, not part of any particular zone, or clear-cut definition was arbitrarily introduced in CRZ 2011. This included CVCAs and entire CRZ areas of Mumbai, Goa and Kerala.</p> <p>This category under CRZ 2018 jettisons the three states and only retains CVCAs. It now adds backwater islands and mainland islands to this category. For the backwater islands, the CRZ area is now restricted to 20 m from the HTL. For mainland islands, an IPZ kind of planning is proposed.</p> | <p>The reasons for dropping Mumbai, Goa and Kerala from this category unclear. From our reading most of the concessions given are now available to all states further diluting the safeguards built into the CRZ 2011.</p> <p>The CVCA remains an undefined category with unspecified intentions. There is no clarity on the process of implementation.</p> |

The overall changes in CRZ zone boundaries and its sub zones will result in shifting more areas from higher levels of regulation to lower levels of regulation. The extent of such areas is unknown at the moment and will be clear only when the CZMPs for the new regulation is prepared² .

2. Changes in regulations for different zones

Sea front for all?

The first important change is that the overall principle of providing regulated access only to activities requiring seafront or foreshore facilities has been dropped. "Need" is no more the criteria, but "want". In the amended versions

2. It is a saving grace that the changes in zonation will come into effect, including CRZ III-A and CRZ for creeks, only when the CZMPs are ready under CRZ 2018.

of the CRZ 1991 and the original version of CRZ 2011, this criterion was mentioned but co-existed with ugly and arbitrary exemptions. Now the principle/criterion itself has been dispensed with. This automatically opens the door for a lot more activities and will make exclusion more difficult.

A number of changes have been made to the regulations governing the different activities in the different CRZ categories and sub categories and are often difficult to spot due to changes in order and drafting between CRZ 2011 and CRZ 2018. Noting that many of the permissions and exemptions given in CRZ 2011 are already contradictory to the objective of protection of coastal ecosystems or livelihoods of fishing communities, we note some of the important changes in CRZ 2018.

CRZ-I: Lowered sanctity

CRZ-I has hitherto enjoyed a great deal of sanctity by virtue of the very high level of protection it enjoys from human interventions. This is about to change with “eco-tourism” poised to enter CRZ-IA areas. The consequences of this over time could be quite serious.

Some provisions related to the ESAs covered by CRZ-I appear to be mischievous and even dangerous. The implications of the provision that Mangroves coming under the Forest Conservation Act shall only attract the provisions of the Forest Conservation (FC) Act are totally unacceptable. Does this mean that regulations related to mangroves under CRZ regulations do not apply to mangroves declared as forests? Or is it that the punishments will be as per FC Act only? Even then, a mere notification like CRZ cannot decide this as the punishments for CRZ violations come under the EPA, an Act of Parliament. Likewise, the subtle qualification of “active sand dunes” in “dressing or altering active sand dunes”, contained in the list of prohibited activities is a mischievous intervention.

The notion of “compensatory afforestation” for mangrove destruction is not meaningful, especially when it is done far away from the place of destruction. Mangroves provide local livelihoods and food security and unless the com-

compensatory afforestation can actually avoid loss of livelihoods and food security in the same location, other forms of compensation to local communities have to be considered in addition. It must be understood that many of the fish and crustacean species in the mangrove areas also support marine fisheries. Hence those affected by mangrove destruction may not be only those fishing in the mangroves. If this is thought through, mangrove destruction for any development purpose can only be approved in the “rarest or rare” cases.

Inter-tidal zone: expanding construction activities

CRZ-IB area—the inter-tidal zone—seems to be allowed for various human interventions with the rationale somewhat unclear for a large number of them. As big cities struggle to manage traffic, the Mumbai model of encroaching into the sea for creating new paths to ease traffic congestion is gaining attention, and MoEF seems happy to encourage this trend with generous provisions for construction such “roads on stilts” and sea-links in the inter-tidal zone. It is even providing for “mass rapid or multi-modal transit systems”. The importance of the inter-tidal zone for fisheries and the need to treat it as an important part of the buffer between land and sea, seems to be lost on the MoEF. The wide inter-tidal zone in the northern latitudes of our coast is such an important area for fishing and needs protection from such cavalier use.

The expansion of fish processing units in the list of permissible activities in the inter-tidal zone makes a new entry, making one wonder whether it is a printing error. Mention of the marine police station is also unclear as to whether the station itself will be allowed in inter-tidal zone or just sea front facilities to tie their boats. If it is the latter, this is already permissible and does not need any special reference.

Lots of “associated facilities” are permitted along with the main activity that requires the sea front: weather radar, salt harvesting and desalination plants. What exactly these facilities are, is not clear. Not sure what is in store for the inter-tidal zone.

CRZ-II: Merged with the urban jungle?

CRZ II finally sees the “equalisation” of its FSI allowance with that of non-CRZ areas in the concerned urban area. This is another point where the 1991 cut off has been removed. There will now be no real difference between CRZ areas and non-CRZ areas in urban areas. CRZ II will now be only nominally part of the overall CRZ regime.

CRZ-III: Fishworkers pushed towards the sea, as Government creates space for tourists and mines

CRZ III regulations are the same whether it is CRZ IIIA or IIIB. Except, of course, the width of the NDZ areas will be different.

Some interesting new permissions have made their appearance. In case a national or state highway passing through the NDZ (within 200 m or just 50 m from the HTL, as the case may be), it is proposed to permit “temporary” tourist facilities such as toilets, change rooms, drinking water facility and shacks on the sea ward side. Permanent infrastructure like resorts and hotels can be set up on the landward side of the said highway. This seems such a creative way to provide an entry of the hotel/resort industry into the NDZ as it is allowed only in the 200-500 m in the CRZ III till now.

Puzzlingly, the very next clause allows for temporary tourist facilities in the NDZ of all CRZ areas. Then why the special clause for putting up temporary facilities seaward of the highway that passes through the NDZ?

Somewhat stunningly, the tourism provision for temporary facilities comes without distinguishing between CRZ III-A and CRZ III-B. If CRZ III A is so congested that people have to be permitted to live as close as 50 m from the high tide, how can tourist infrastructure be permitted? In the non NDZ part of CRZ III, permanent tourist infrastructure is permitted in “vacant” plots (as per guidelines). This provision also does not distinguish between III-A and III-B areas. One would presume that vacant plots should be the claim of fishworkers who are forced to live in vulnerable areas 50 m away from the HTL, rather than for hotels and resorts.

Another contradiction with respect to tourism in CRZ III is that ground water extraction is allowed within the CRZ only by manual means from open wells. This is allowed only for local communities within the 200 m zone and for all within 200-500m. This means that hotels that are established within the CRZ can only use wells or have to bring water from outside the CRZ. Is this realistic? Talking of ground water extraction, ice plants, which were deleted after discussion in CRZ 2011, are back with a bang. They can be set up in the NDZ itself! How does the MoEF expect industries that are water-intensive like ice plants to be set up in areas where only manual extraction from open wells are allowed? The possibility that they will bring in water from beyond the CRZ area is only theoretical and unlikely to happen in practice.

Another new provision is worth a careful scrutiny. It is the provision to permit mining of "limestone minerals" in the non-NDZ areas of CRZ III. Till now, mining on the coast is allowed only for minerals not found elsewhere. This new provision is clearly aimed at some particular stretches of the Indian coast, but to aid it, one of the fundamental principles that governed the CRZ so far, is being sacrificed. This clause, probably introduced to help a particular industry in a particular stretch of coast, may open the flood gates in the near future.

Given that fishing villages mostly fall in CRZ III, the provisions related to CRZ III do not inspire any confidence that the fishworker housing issue will be resolved. The decrease in NDZ in the more densely populated areas cannot be seen as a legitimate solution to this. The CRZ 2011 proposal of fishing village development plans, including expansion plans, has been omitted without giving it a try. Hence, this has to be part and parcel of a historically corrective land rights recognition legislation for fishworkers and other traditional coastal dwellers.

CRZ IV: A monumental opportunity?

CRZ IV: The sea area up to 12 nautical miles became part of the CRZ 2011, but without a clear agenda in terms of the environment. The corals were already protected under CRZ 1991. CRZ 2018 proves that the MoEF has no positive agenda for this zone. The environmental content is absent or weak. All it

attempts to do is to provide a formal process for investment in infrastructure in the sea, an area that was very limited in the past and likely to increase rapidly in the future.

MoEF graciously permits “traditional fishing” in CRZ IV. It probably has no clue what traditional fishing is. Today, a whole range of traditional and modern fishing methods co-exist in the territorial sea and is regulated—quite poorly, if we may add—by the State fisheries departments, all of which have their version of “marine fisheries regulation acts” or MFRA. It is best for MoEF to completely avoid mention of fishing in the CRZ, unless the fisheries sector starts developing infrastructure at sea. It may be noted that the MoEF has an alternative instrument—the Wildlife Protection Act—under which certain aspects of marine fishing, especially species and habitat protection are being done in a few locations. It is rather upsetting that the CRZ part of MoEF is unaware of what the “Forest” part of the MoEF is up to.

Oil rigs were already there, with or without CRZ. Most of the other provisions are related to ports and shipping, mostly related to the foreshore facilities that may extend beyond the inter-tidal zone. Water extraction for cooling plants of thermal power plants area also included. There is the futuristic provision (already present in 2011) for power from non-conventional energy sources. We also have blanket provision for any projects of the two holy cows every patriotic Indian has to worship: Defence and Atomic Energy.

The unexpected entry in 2018 to the above list containing the “inevitables”, is the provision for setting up “memorials and monuments”! Unable to stop a powerful state Government from putting up a huge monument at sea, MoEF is trying to make a virtue of necessity by bringing in as many as four clauses to “regulate” such monuments. Now, all coastal states can start thinking of putting up monuments at sea, even if they had not thought of it so far

3. CZMPs: Losing the plot?

CZMPs made under 2011 will require modification to suit the more permissive CRZ 2018. The hazard line, for which large investment has already been made

under a World Bank project, is not required. Since the CZMPs under 2018 are only expected to require only small modifications or corrections to the CZMPs prepared under 2011, there is no talk of any fresh public hearing. It seems that the state MoEF is intent to take up the task itself without involving the citizens.

The entire section on CZMPs sounds unreal or surreal. The only set of CZMPs available are from 1996, which were prepared when the Supreme Court, horrified with the absence of CZMPs without which no regulation was practical, cracked the whip and gave all state Govts a deadline to submit CZMPs. The result was a mix of the good, bad and the ugly. Very few stretches of the Indian coast actually have approved maps as most did not meet the minimum standards set by the MoEF. Hence most maps are just drafts. Given that all this was done in the pre-digital era, all CZMPs are physical maps of low resolution that are not easy to handle and preserve. Many were even carefully hidden from the public to avoid damage.

CRZ 2011 provided the opportunity to make a new set of CZMPs that will make use of the new digital technologies and provide easy access to beautiful digital maps that are accurate and reliable. This is yet to happen. For one, a reliable and acceptable HTL is yet to be drawn. None of the coastal villages have been mapped³. The Hazard line is in limbo. So, a lot still needs to be done for the proper CZMPs to be available. Yet the CRZ 2018 has been drafted as if we already have CZMPs under 2011 and all that is required is for them to be modified slightly!

The CZMP is the cornerstone of the CRZ regime, and after 27 years of CRZ 1991 and 7 years of CRZ 2011 we are still waiting for proper CZMPs. To think of a change of regime in the midst of the current massive exercise of getting CZMPs approved under CRZ 2011, is ridiculous.

4. CVCA: Regulation or something else?

The CVCA is a vague concept initiated under CRZ 2011 and never satisfactorily explained. It is basically proposed for eco-sensitive areas—often in and around

3. It may be noted that the CRZ 2018 guidelines for CZMPs still require mapping of fishing villages. This is a great relief.

CRZ-I areas—where a lot of people live. It is not clear from a regulatory point of view whether the intention is to increase environmental protection, or to reduce it to make available basic facilities for the people living there. If it is only a participatory planning regime, which is neutral from a regulation point of view, it need not be part of CRZ regulations at all. So, unless the principles behind CVCAs are clarified, it will remain an amorphous category that can be manipulated to suit different agenda. MoEFCC needs to clearly spell out the regulatory basis and intent of CVCAs to justify its inclusion in this regulation. Perhaps, it can be developed as an experimental programme of the MoEFCC. Participatory activities are always welcome as long as it is genuine participation ⁴.

5. Changes in clearance system: fast tracking clearances

It is proposed under CRZ 2018 to change the system of clearances. Substantial delegation of power to State CZMAs is visualised. MoEFCC will take responsibility for clearances in CRZ-I and CRZ IV areas leaving the CRZ II and CRZ III to the State CZMAs.

While this makes for a neat division in responsibilities and may help speed up the clearances. However, such a smooth process for granting clearances is more suitable for a ministry that is promoting industries and wants a “single window system”, etc. The idea of CRZ is not to provide easy access to coast but to maintain a buffer zone, where less activities take place, the better it is. So, the proposed changes raise only seem to confirm that the MoEFCC is not serious about coastal protection but wishes to it easy for vested interests to infiltrate the coast.

A specific risk in the proposed delegation of powers is that of allowing the concerned local authority to approve self-dwelling units up to a total built up area of 300 sqmts without CZMA clearance. Unless this provision is restricted to fishing villages and fishing community members (and restricted to a lower built up area), it can open the door for proliferation of urban middle class homes all along the coast.

The clause to provide powers to the Department of Environments in the state

4 NFF had proposed in the CRZ 2011 discussions to re-conceptualise CVCA as Community Managed Coastal Reserves or CMCR. This was initially agreed to, but the MoEF back tracked.

Governments to provide comments when the CZMAs are not functional raises eye brows. Does this not provide the system with an incentive not to constitute CZMAs in time or to let them become non-functional? Unless the Departments and the MoEFCC are under pressure from those awaiting CRZ clearances, they are unlikely to take timely action to constitute or activate the CZMAs. This is one more indicator that CRZ 2011 is meant to speed up clearances rather than ensure proper protection of the environment and traditional coastal livelihoods.

6. Changes in enforcement system: passing the buck... to the fishermen?

Poor enforcement is the bane of the CRZ regime. Any effort to improve enforcement is welcome. The idea of six monthly reports from project proponents that are displayed on SCZMA websites is welcome. Otherwise, CRZ 2018 only stresses that the States are primarily responsible for enforcement. Do states have the commitment or capability to do this? What prevents from the MoEF investing more on enforcement rather than pass the buck to state Governments, whose environmental budgets are low.

The new proposal to provide a bigger role for District level committees is good. The retention of the CRZ 2011 provision for three fishworker and coastal representation is also welcome. However, this will work well only if the District committees are properly constituted and the fishworker representatives are one those who have accountability to the larger fisher population in the district.

The effectiveness of the DLCs will also depend on the extent to which the members are given a proper orientation on the provisions of the CRZ regulations and the communities also have a basic understanding of the CRZ. More importantly, the DLCs can only do the right things if the SCZMAs are themselves strengthened and send the right signals to the District Collectors and the DLCs. Just to pass the buck to the lowest tier—the DLCs—and expect the presence of fishermen in them to do the trick is not realistic. Isn't it ironic that fishing communities have very little say in the formulation of the regulations and no representation in the CZMAs and NCZMA? Yet, they are expected to be watch dogs at local level, when the entire system is stacked against them!

In terms of enforcement, the striking feature is the complete absence of any reference to past violations, something that CRZ 2011 promised. Equally important is the absence of any new deadline to resolve the issue of discharge of untreated sewage and effluents.

The MoEFCC needs to do a proper study of enforcement issues and bring out a report that can be the basis of the proper design of an enforcement regime.

7. Missing: 1991 as cut-off year

It has always been understood that any new notification does not change the importance of 1991 as the cut-off year, when looking at activities that are operating in the coastal zone. All activities that came up after Feb 1991, face the burden of proving that they have established in conformity with the CRZ rules. Likewise, even if the various lines governing the CRZ space—HTL, LTL, 500 m, 200 m, etc.—may have changed due to shoreline changes or other reasons, there is still the need to refer to the original lines in the 1991, to understand whether a violation has taken place or not. The CRZ 2018 is completely silent on this. Does this mean that the MoEFCC is not keen on revisiting the past and prefers to condone all past violations.

8. Greater Mumbai: Ignoring the Kolis?

With the special dispensation to Mumbai given in CRZ 2011 being withdrawn in CRZ 2018, two special clauses (10.3 (i) and 10.3 (ii) have been added regarding the preservation of the “green lung” and the restrictions on the construction of sewage plants in mangrove areas. However, the plight of the Mumbai fishing communities that the special dispensation took note of is completely absent. CRZ issues faced by the Kolis, the original inhabitants of Mumbai, now trapped in India’s most populous city, are extremely complex. On the one hand they have no space to grow and on the other hand builder lobbies are using slum resettlement as a tool to take over Koli homelands. The various provisions of CRZ 2018, such as the conversion of CRZ-III areas in cities to CRZ-II, changes in the FSI regime, etc., may worsen their position on the coast. The Koliwadas require special protection and realistic policies for house construction, if they have to survive.

9. Draft CRZ 2018: Summary and assessment

1. The CRZ-I, which has been accorded a great deal of sanctity till now, is also being opened up. Even if the initial opening looks innocuous, this can be likened to the “Camel in the Arab’s tent” strategy.
2. CRZ II will be practically out of the CRZ regime with very little regulation and it will also grow in terms of share of coast with the erstwhile CRZ-III areas within Municipal limits being absorbed into CRZ.
3. The division of CRZ III into A & B with a reduction of the NDZ from 200m to 50 m in III A raises a lot of concern for the health of the coast and the safety of coastal populations.
4. Fishworker housing issue has not been touched and dropping of the idea to develop plans for fishing village development/expansion have been dropped. Reducing the NDZ need not necessarily resolve fishworker housing scarcity.
5. There is a general reduction in prohibitions as well as restrictions that will open the coast for more activities.
6. The dropping or abandoning of the principle of “activity requiring sea front” will have serious negative consequences for coastal eco-system and existing livelihoods.
7. Another principle that is being abandoned is that of restricting mining activities in the CRZ only to minerals not available elsewhere. This can also have disastrous consequences.
8. Many of the permitted activities within CRZ are not compatible with the principle of ground water extraction through manual means from open wells.

9. The CZMAs under CRZ 2011 are incomplete and require more work. Talking a CRZ regime change in the midst of this exercise is unacceptable.

10. The dropping of the hazard line without any explanation is a grave matter.

11. The absence of reference to past violations and the absence of any deadlines for treatment of sewage and effluents, are serious omissions.

12. The 1991 year as cut-off has been jettisoned and opens the door for many manipulations including the acceptance of illegal changes in shorelines and encroachment and reclamation activities in the past.

13. The proposed system to clear projects will only help faster provision of clearance and not improved coastal protection.

The CRZ 2018 will increase the access to coastal resources in a significant manner. This is not worthy of an environmental regulation meant to restrict access to the coast and maintain a crucial buffer zone. It will also significantly destroy fisheries livelihoods and displace fisher populations. Hence NFF comprehensively rejects the draft CRZ 2018.

NFF's response to the Draft CRZ Notification 2018

Part 3: The importance of retaining and correctly implementing the CRZ 2011

After commenting on the Draft CRZ Notification 2018, it is important to comment on why retaining the CRZ 2011 is necessary and to question whether a new notification is genuinely required. The NFF, one of the contributors to the drafting of CRZ 2011, has strong credentials to examine this issue and we present our considered view on this.

1. CRZ 2011—The process

The CRZ 2011 was the outcome of a long process that cannot be and should not be forgotten. It is worth recalling that process, if only to understand what may be lost by repealing CRZ 2011 and introducing an unwanted new CRZ regime.

-To understand the process in the implementation of the CRZ 2011, one must go all the way back to 2005 when the submission by the MS Swaminathan Committee proposed the replacement of the Coastal Regulation concept with a Coastal Management one. This was essentially to replace the CRZ 1991 regime. It must be mentioned that the MS Swaminathan Committee which met a wide range of stakeholders, never met representatives of the fishing community, the largest stakeholder on the coast.

- This change from 'regulation' to 'management' as a concept was strongly condemned by coastal communities, environmentalists and civil society organisations. Still, the MoEF went ahead with the formulation of a CMZ notification, but in view of the strong opposition, sought feedback to its initial formulation in 2007, without taking the step of formally notifying it as a draft notification.

- Though the initial formulation of a CMZ notification attracted strong objections, the MoEF went ahead and formally notified a Draft CMZ Notification in 2008, with a number of modifications to its initial offering.

- The Draft CMZ notification, in addition to receiving a big number of comments from across the coast, mainly negative, led to large mass movement on the coast to retain the CRZ 1991, after removing the dilutions done to it by the 25 amendments made to it.

- The NFF played a leading role in fighting the CMZ notification with a Coastal Yatra from Kutch to Kolkata, led by its then Chairperson, the late Harekrishna Debnath. A National Coastal Protection Campaign (NCPC), with membership from a wide range of environmental, coastal and other civil society organisations, was formed to protect the CRZ regime.

- In view of the huge number of public objections to the draft notification and the unceasing protests on the coast, in mid-2009, the MoEF constituted Swaminathan Committee II, with a mandate to review the objections and propose solutions. The Committee, after a review of the objections and consultations with some key stakeholders, recommended the retention of CRZ. However, it proposed a new CRZ notification that strengthens protection of the coastal eco-system and the livelihoods of fishing communities.

- The MoEF, accepting the Swaminathan Committee II recommendations, organised a series of well-attended public consultations in all the coastal states and collected views and suggestions for a stronger and better CRZ.

- Based on these consultations, the MoEF brought out a Draft CRZ Notification in 2010. Surprisingly, many of the provisions of the draft notification were against the spirit of the discussion in the public consultations, and some of the widely supported suggestions were ignored. This resulted in a fresh round of protests across the coast.

- The deep discontent of the fishing communities across the coast resulted in the Chief Ministers of four Coastal states directly writing to the Prime Minister and the Minister of Environment, asking them to address the issues raised by the fishworkers. Finally, the Minister for Environment intervened to invite the NFF for a series of negotiations in December 2010 to help break the deadlock. Four rounds of discussions between the fishworker representatives and the senior scientific staff of the MoEF resulted in the final formulation of what became CRZ 2011.

2. CRZ 2011 process- The significance

CRZ 2011 was unique and historical in many ways because even though the requirement of the public being given a 60-day window to comment on any notification, the strong movement to protect coastal regulations led by fishworker organisations, resulted in this window becoming an open door for democratic participation.

- During the CRZ 1991, even though the NFF's former chairperson the late Thomas Kocherry was involved in the consultative process, fishing community representation was not present during the start. Since the community was not actively engaged through NFF, it took time for the fishworker communities across India to understand the ramifications CRZ had on their lives, livelihood and habitats.

- This interest was at its peak during the 2007-10 period, as a result of which the fishworker organisations were at the forefront to protect the CRZ and negotiate a new notification that would not deviate too much from the spirit of the original CRZ 1991.

- Though it was a fishworker trade union that did the final negotiations, it is not as if the CRZ 2011 reflects only the interests of the fishing community. The NFF team, led by the late Matanhy Saldanha, who went on to become Goa's Minister for Fisheries & Tourism, was non-partisan in its orientation and had the backing of a wide range of civil society organisations. It always put the environment ahead of other interests,

long term interests over short term interests, and was inclusive in its approach to other coastal communities.

- The CRZ 2011 also cannot be taken as the triumph of the fisher and civil society viewpoint. It actually represents a compromise with the other point of view, that of “development” as an imperative that requires constant dilution of environmental protection. Government departments rarely factor in the local communities in their development plans where the local communities are often seen as impediments to “development”. Therefore the final negotiations were all about how much concession could be made to the environment and fishworkers without the MoEF upsetting the larger system it belongs to.

- Overall, CRZ 2011 is the product of a long-drawn out process that ensured that all interests were eventually represented in its formulation. Just a humble notification, it can claim to be the product of a public participation that was wider than many of the laws passed in the parliament.

3. CRZ 2011—Important provisions to protect the environment and coastal communities

Though the MoEF was unwilling to rectify the various distortions made to CRZ 1991 through 25 amendments and was also keen on adding a few more distortions—like a “greenfield airport” for Mumbai and “roads on stilts”, all in mangrove areas—it did introduce a number of ideas to protect the coast and strengthen the implementation of the CRZ. In spite of the amendments to and the non-implementation of the CRZ 1991, a few provisions of the CRZ 2011 require special mention.

The hazard line

This line is based on the recognition that the CRZ, constrained to a set-back zone of 500 m, was inadequate to protect the interior from the wrath of the sea, especially from natural calamities. MoEF had worked on this idea and pro-

posed the demarcation of a “hazard line” that indicated all the areas landward of the CRZ that were vulnerable to natural disasters. Such a line would ensure that new activities planned on the coast took this vulnerability into account. It was however, not to be used as a tool to dislodge historical coastal communities from their homelands but used for planning evacuation routes and making safety plans.

High resolution mapping and the drawing of an All-India high tide line

The CRZ 1991 was often difficult to implement due to lack of precise maps of the coast at cadastral level and this could be rectified by use of latest satellite technologies and other new technologies available to map the coast. It was therefore proposed to be drawn across the entire coast of India, commissioning the Survey of India and using a combination of aerial photography and satellite images. The new NCSCM was to be responsible for this work.

Retaining 1991 as the cut-off year

There were strong suspicions that a new notification superseding the 1991 notification would be used to cover up interventions on the coast unapproved under CRZ 1991. New lines drawn up to provide the latest information and at high resolution could also be used to help those who had illegally caused shore line changes and encroached on restricted areas as per CRZ 1991. At the insistence of NFF, various clauses in CRZ 2011 were modified to ensure that 1991, as the cut-off year, would still have sanctity for many purposes. Any changes in the HTL, LTL and boundaries of the different zones (CRZ I, II & III) would require reference to the original lines in the CZMPs drawn up under CRZ 1991 and the variations properly explained and justified.

Identifying past violations and taking strict action

Once again, allaying suspicion that the new notification was to allow past violators to go scot free, CRZ 2011 clearly set deadlines for identification of violations under CRZ 1991 and for punishing the violators.

Dealing with release of untreated sewage and effluents into the sea

While the release of untreated effluents and sewage was already prohibited under CRZ 1991, CRZ 2011 brought in a sense of urgency to this requirement. CRZ 2011 provides clear deadlines for all concerned urban bodies to prepare plans for this and submit them to the MoEF and to implement them.

Restrictions on coastal protection structures

In the name of protecting the coast from erosion and to provide safe anchorages for small boats, hard structures like seawalls and groynes are on the increase and are threatening to make the entire coastline, in many states, an artificial one. This will represent a huge loss, both ecological and economic, to the nation. To prevent this and to push for more eco-friendly ways of shore line protection (such as off-shore reefs, beach nourishment, use of geo-textiles, etc.), CRZ 2011 brought coastal protection structures under regulation, requiring EIAs and MoEF permission.

Protecting fishing villages from encroachment by development projects

Peninsular India's 6000 km coastline is dotted with 3200 fishing villages hosting a population of 4 million fisherfolk (CMFRI, 2010). With each village occupying more than a kilometre of coast line, over half of the coast is fully used by the fishing community and there are very few long stretches available for any other activity without displacing fishing communities. This reality is not understood for the simple reason that land records do not reflect this.

Most coastal areas, seaward of farmlands, come under a common property regime with fishing communities residing as per local customary rights rather than title deeds. A lot of the space used by a fishing village is open space for fish landing, parking of boats, drying of fish, mending of nets, play grounds, burial/cremation grounds, etc. Such spaces can be equal to or more than the area used for residential purpose. The lack of proper documentation of this (locally well known) reality has resulted in higher authorities sanctioning projects without understanding local context and project proponents conceal

information about the pre-existing uses of the coastal areas they are attempted to take over.

CRZ 2011 resolves this issue by making the mapping the fishing villages along the coast as well as the common spaces used by them as an essential part of CZMPs.

Resolving the fishworker housing issue

The mere mapping of the fishing villages would not resolve the need for more space for fishworker housing and other needs. This need had resulted in fishing communities and the State Governments seeking the dilution of CRZ norms for housing and other social infrastructure. In particular, the No-Development Zone (NDZ) in CRZ-III areas was sought to be drastically reduced, especially in the thickly populated west coast. Based on the NFF-MoEF dialogues, this issue is sought to be resolved in the following manner by CRZ 2011.

- The mapping of fishing villages and the availability of the hazard line should lead to a village wise planning for the long-term development of each village (jointly by the Govt and the village community), taking into account both space requirements and vulnerability reduction. This implied that space needs could be met by state Government finding space for village expansion (either landward or on either side of the village) without having to expand seaward. This village level planning exercise is clearly a state Government responsibility under CRZ 2011.

- However, it is conceivable that additional space requirements cannot be easily met in all areas without a seaward expansion of the settlement. CRZ 2011 permits the State Governments to use the 100-200 m zone in CRZ-III for such an expansion, only after exhausting all alternatives and with adequate safety precautions in case of natural hazards. This is meant as a last resort and not as a routine mechanism.

Holding on to the “sea-front criteria”

An acid test for a permissible activity (with or without restrictions) under CRZ 2011 has been whether the activity needs the sea-front or not. Activities that do not require the sea-front cannot have any claim over that CRZ area. This principle, unfortunately, has been diluted for specific requirements through the various amendments to CRZ 1991 and through some new provisions under CRZ 2011. It is worth mentioning that the NFF argued successfully for use of this criterion even for fisheries-related infrastructure.

Coastal Community representation in CRZ decision making bodies

The NFF sought a clear-cut provision for representation of fishing community organisations at all levels of the CRZ decision making process: National Coastal Zone Management Authority, State Coastal Zone Management Authority and the District Coastal Zone Management Committee. All was conceded in the final notification was the representation of coastal communities, especially fishworker community in the District Committees. However, it does open the door for a formal representation at a level where violations could be noted and reported.

4. CRZ 2011- The incomplete implementation

Even though seven years have passed since the notification of CRZ 2011, the implementation has been disappointing to say the least. The following points are worth highlighting, even if the actual list of failures is much longer.

Violations

The MoEF and the state authorities have largely failed to comprehensively identify violations of CRZ 1991 across the coast and take action on those who committed those violations. Violations continue to mount as various interests are trying to corner different parts of coast.

Pollution

The deadlines for preparing plans for sewage treatment by local bodies are long over and there is very little progress in ensuring that untreated sewage does not get dumped in the sea. Meanwhile the dumping of solid waste, espe-

cially plastics, has increased at an alarming rate.

Coastal protection structures

Coastal protection structures that require environmental assessment and permissions continue to proliferate with impunity. There is no evidence that even one such structure has been accorded permission in any state as per procedure prescribed by CRZ 2011.

Hazard Line

After seven long years, we are yet to see the hazard line. By all reports, the Survey of India had completed the aerial mapping. However, the final line is yet to be put up in the public domain. It is a matter for concern that the CZMPs do not use the hazard line and the draft CRZ 2018 makes no mention of the hazard line.

Coastal community participation in CRZ bodies

Even the nominal representation of a representative of the fishing community (and or other coastal communities) has not been implemented in a majority of the coastal districts in India. In any case, district committees are non-existent or non-functional in many districts.

High Tide Line

The HTL line mapping seems to have been completed by the NCSCM based on Survey of India work. Despite the long time it has taken to make this line, it is not satisfactory. The line itself was not put up for any public verification or validation. No attempt was made to take coastal communities in confidence and build their trust in the new line.

It has been used in the preparation of the CZMPs that are currently being put up for public comment in some states. Many discrepancies have been noted and there are instances of the new line favouring those who have illegally caused shoreline changes. Thus, the HTL drawn by NCSCM requires a more rigorous process of local verification and validation. There is no evidence that the MoEFCC is considering such an exercise.

Fishing villages

Nowhere across the 6000 km coastline has the exercise to map fishing villages started. Not even one of the 3200 villages has been mapped in the seven years since the notification of CRZ 2011. State Governments even seem unaware of their responsibility in this matter and the MoEFCC does not seem to have made any effort to make them aware. This gives the impression that Govt is not interested in providing protection to the coastal communities from encroachments by industries and private capital.

Fishworker housing

With increase in population, lack of space to grow and the appropriation of their spaces, the fishworker housing issue has become a serious issue in many parts of the coast. The failure to map the fishing villages and the mandated long-term planning exercise with village communities is yet to commence. Like the mapping of the fishing villages, the state Governments seem to be blissfully ignorant of the role given to them to resolve fishing village space and development issues.

Coastal Zone Management Plans (CZMP)

CZMPs have been prepared for some parts of the coast and public hearings have been held. Unfortunately, no effort has been taken to prepare the coastal populations to participate meaningfully in such an important process. In many areas, the public hearings were not well attended due to the erroneous process followed by the pollution control boards. In areas where civil society actors were alert, the coastal community participation has been higher and they have noted many discrepancies and mistakes.

Two important gaps are the absence of the promised hazard line and the fishing village maps. Without these, the CZMPs prepared under CRZ 2011 are incomplete and cannot be taken seriously.

Notes

Notes

NFF's response to the MOEFCC with regards to the latest amendment to CRZ Notification 2011

Date: 20th July 2018

To,
The Secretary,
Ministry of Environment, Forests and Climate Change,
1, Jor Bhagh Road,
Aliganj,
New Delhi - 110003

Subject: Amendment to CRZ Notification 2011 through S.O 3197 (E) dated 2nd July 2018

Sir/Madam,

This is with reference to S.O 3197 (E) dated 02nd July 2017 that was published by the Ministry on its website. The amendment has been made without placing the same in the public domain via a notice and a public hearing. The use of the clause to dispense of this notice process can only be utilised when environmental protection has to be strengthened. However, in our understanding of the draft the amendments are dilutions to the CRZ 2011 notification. This is evident via:

1. The Hazard being made redundant as an environment-protection tool. The administrative powers given to the Hazard Line within the CRZ Framework have been removed, thereby reducing the hazard line to merely a tool that has to be taken into account while planning.
2. Ecologically sensitive areas such as CRZ-I areas being opened up for projects related to Defence organisations. The terms used here are arbitrary and with no legal definition making it possible to introduce a range of exceptions

for these projects.

These proposed amendments were present in the Public Notice bearing No. F.No. 19-112/2013-1A-II1 dated 18/04/2018 introducing the Draft Coastal Regulation Zone Notification 2018 which the NFF has unanimously rejected. This amendment effectively achieves the main intentions under the draft notification, thus facilitating intensive infrastructure on that coastal stretches of India. As such, the amendment is not a measure to strengthen the protection to the environment, and as such the ministry has misused the powers given to them through the Environment Protection Rules 1986 by dispensing off the need for notice for an amendment.

The Ministry of Environment, Forests and Climate Change must set aside this amendment, S.O 9197 and ensure that all stakeholders are notified about the intention and reason for such dilution and given time to make their suggestions/oppositions. Until such a time, the MoEFCC must declare this notification dated 02nd July 2018 null and void.

Yours sincerely,

Narendra R Patil (Maharashtra)
Chairperson
(Mob. No: 99232-41641)

T Peter (Kerala)
General Secretary
(Mob. No: 82899-05239)



National Fishworkers' Forum (NFF)

(A Federation of State Level Trade Unions in India)

Reg. No. 487/85 Email : nff@nffindia.org, Website : www.nffindia.org

**Administrative Office :**

NFF, The SFSS Soc. Ltd.,
Post - SATPATI, Tal & Dist. Palghar
PIN - 401405, Maharashtra
Tel / Fax : 02525224142

Registered Office :

NFF, Cherureshmi Centre
Vallyathura P.O., Trivandrum
PIN - 695008, Kerala
Mob : 08289905293

Central Office :

NFF, 20/4, SIL Lane
Kolkatta - 700015,
West Bengal
Tel/Fax : +913323283989

Delhi Office :

NFF
F10/12, Malvia Nagar
New Delhi - 110017
Tel : 01126680883

Chairperson :

Narendra R. Patil

Email: rpatilnarendra@gmail.com, Mobile : 09923241641

General Secretary :

T. Peter

Email : peter.ksmit@gmail.com, Mobile : 08289905239

To,
The Secretary,
Ministry of Environment, Forests and Climate Change,
1, JorBhagh Road,
Aliganj, New Delhi - 110003

Date: 04/07/2018

Subject: Amendment to CRZ Notification 2011 through S.O 3197 (E) dated 2nd July 2018

Sir/Madam,

This is with reference to S.O 3197 (E) dated 02nd July 2018 that was published by the Ministry on its website. The amendment has been made without placing the same in the public domain via a notice and a public hearing. The use of the clause to dispense of this notice process can only be utilised when environmental protection has to be strengthened. However, in our understanding of the draft the amendments are dilutions to the CRZ 2011 notification. This is evident via:

1. The Hazard being made redundant as an environment-protection tool. The administrative powers given to the Hazard Line within the CRZ Framework have been removed, thereby reducing the hazard line to merely a tool that has to be taken into account while planning.
2. Ecologically sensitive areas such as CRZ-I areas being opened up for projects related to Defence organisations. The terms used here are arbitrary and with no legal definition making it possible to introduce a range of exceptions for these projects.

These proposed amendments were present in the Public Notice bearing No. F.No. 19-112/2013-1A-II1 dated 18/04/2018 introducing the Draft Coastal Regulation Zone Notification 2018 which the NFF has unanimously rejected. This amendment effectively achieves the main intentions under the draft notification, thus facilitating intensive infrastructure on that coastal stretches of India. As such, the amendment is not a measure to strengthen the protection to the environment, and as such the ministry has misused the powers given to them through the Environment Protection Rules 1986 by dispensing off the need for notice for an amendment.

The Ministry of Environment, Forests and Climate Change must set aside this amendment, S.O 9197 and ensure that all stakeholders are notified about the intention and reason for such dilution and given time to make their suggestions/oppositions. Until such a time, the MoEFCC must declare this notification dated 02nd July 2018 null and void.

Yours sincerely,

Yours sincerely,

Narendra R Patil (Maharashtra)
Chairperson (Mob. No: 9923241641)

T Peter (Kerala)
General Secretary (Mob. No: 8289905239)

Copy of NFF's submission on CRZ notification 2011 amendments



From NFF archives

Questions for consideration:
Honourable Parliamentarians to raise
in the House

Will the Hon'ble Minister for Environment, Forest and Climate Change (MoEFCC) be pleased to state the following:

Question Set 1:

1. Details of submissions/manifestation of fisher communities, consultants, corporate houses, parliamentarians, and from other agencies received for the purpose of CRZ Notifications and its amendments to the date.
2. Details of submissions/manifestation considered to alter or modify proviso "Construction reconstruction of dwelling units between 200 and 500 metres of the High Tide Line permitted so long it is within the ambit of traditional rights and customary uses such as existing fishing villages and goathans" of CRZ 1991 in subsequent CRZ Notifications or amendments.

Question Set 2:

1. Whether "conservation & protection of coastal resources" is one of the objectives of "Integrated Coastal Zone Management (ICZM) Project". If not, reasons thereof.
2. Records of comparative study of destruction of coastal resources and ecology by traditional fisher / coastal community and external elements implementing infrastructure projects
3. Reasons for which need and representation of fisher and coastal communities are kept asides in formulation of ICZM Projects.
4. How borrowing concept by government satisfy the concept of sovereign status of the Republic of India.

Question Set 3:

1. Details of recommendations or suggestions of MoEFCC to Comptroller and Auditor General (CAG) of India to make a comprehensive audit of implementations of CRZ notifications in all coastal States and results thereof
2. Definition, law and rules under which MoEFCC is exempted from complying observations of CAG
3. Explanatory note on incorporation of each observations of CAG "Audit Report (Economic Sector) for the year ended 31 March 2016, Compliance Audit" in amendments of CRZ 2011 and in draft CRZ 2018

Question Set 4:

1. Copy of letter/order used to consult coastal MPs to draft CRZ 2018, list of MPs consulted and consent letter of these MPs
2. Attendance list, agenda and minutes of the Inter-Ministerial meeting to review CRZ notification
3. Copy of suggestions made or representation given by MPs, State Governments, Fisher communities to amend CRZ 2011 for infrastructure development in coastal area

Question Set 5:

1. Whether Dr Shailesh Nayak Committee consultation with Coastal MPs and Fisher community is as per its Terms of Reference? If not, then reasons there of and if yes, then details of these consultations.
2. Format of report provided to this committee to prepare and submit its report.
3. Whether this committee was executive committee or legislative committee.
4. Whether this committee has limited or unlimited power to consult stake holder and include or exclude their issues or objections.

Question Set 6:

1. Parameters used by the MoEFCC to check legality of the contents of Dr Shailesh Nayak Committee report while making draft CRZ 2018, as well as latest amendment to CRZ 2011.
2. How do the prohibitions and exceptions contained in the draft CRZ 2018 equally and naturally legitimate and legal for infrastructure project component owners and traditional fisher communities?
3. Accrual in each head in each activity of Dr Shailesh Nayak Committee in each State and Center Government

Question Set 7:

1. How is the draft CRZ 2018 a solution to the problems identified by Comptroller and Auditor General of India in its "Audit Report (Economic Sector) for the year ended 31 March 2016, Compliance Audit, Chapter 3, Page 43-65".
2. Whether MoEFCC is exempted from considering or consulting the reports of CAG while making any amendment to CRZ Notification. If not, then details of

action taken on the CAG observations

3. Details of recommendations or suggestions of MoEFCC to CAG to make a comprehensive audit of CRZ notifications implementations in all coastal States

Question Set 8:

1. Complete list of manifestations, suggestions and objections received under the definition of 'Public Interest' while carrying out amendments to CRZ 2011; affected in published notification dated 2nd July 2018

2. Reasons for acceptance and rejection of each manifestations, suggestions and objections

3. Definition of 'Public Interest' used for the latest amendment to the CRZ 2011 and authority of defining agency.

4. Study report that recommends removal or reduction of Hazard Line as a measure to environmental protection under CRZ Notification(s)

Question Set 9:

1. Name of the coastal community organizations and their demands and objections submitted to the Ministry regarding CRZ notifications since 1991

2. Reasons of rejection of these demands, if any, stated in the official document of the Ministry or its subordinate offices

3. Estimated loss of environment being considered while rejecting these objections and demands

4. Details of jurisdiction of draft CRZ 2018, other than protecting environment

5. Details of the power delegated to formulate CRZ Notifications

Question Set 10:

1. Details of the Coastal Community's organizations consulted before drafting CRZ 2018 and their submissions to the drafting committee

2. Submissions of the other stakeholders, received before and during the preparation of draft CRZ 2018

3. Reasons for acceptance and rejection of each items contained in the submissions of these stakeholders

4. Details of official letter / order used to translate draft CRZ 2018 in the local languages of coastal communities for the purpose of consultations with them

Will the Hon'ble Minister for Law be pleased to state the following:

Question Set 1:

1. Whether the CRZ Notification is part of the 'law' under Article 13 of the Constitution of India?
2. The details of constitutional provisions under which agencies like Ministries, Consultants, Corporations, Corporate houses, etc. are authorized to make such laws without parliamentary debates
3. Whether the government or its agencies were exempted from incorporating provisions contained in PART 3 and PART 4 of the constitution during the policy formulation. If not, then the status of land titles and livelihood titles granted to fisher communities in coastal belt since 1991.

Question Set 2:

1. Whether the Draft CRZ 2018 undoes the authority of National Green Tribunal (NGT) (OA No.424 of 2016 and OA No. 11 of 2014) exercised in the orders pertaining to completion of CZMPs by 31st July 2018 under CRZ 2011?
2. Casewise details of NGT orders and its corresponding contents in draft CRZ 2018
3. Whether Dr Shailesh Nayak Committee has consulted NGT orders and reports. If yes, then details of comments thereon and if not then reasons thereof.

Question Set 3:

1. Categorical details of the items of Union List/Concurrent List/State List covered, directly or indirectly, under Coastal Regulation Zone (CRZ) notifications 1991, 2011 and 2018 (draft).
2. Whether CRZ notifications are exempted from incorporating the values contained in Article 38 and 39 of the Constitution of India.
3. If not, then extent to which they are incorporated and their physical quantitative results since 1991.
4. Details of the CRZ violations complaints received, registered, resolved and pending since 1991 under all executive and judicial authorities.

Question Set 4:

1. Whether the Ministry of Environment, Forest and Climate Change (MoEFCC) has power to make provisions to the contents of CRZ notification thus making it legal to infrastructure project component owners (rich people) and illegal to traditional fisher community (poor)?
2. Details of the each objection, suggestions and manifestations received from each stakeholder and action taken thereon while proposing draft CRZ 2018.
3. Whether (MoEFCC) has power to make anything less legal or more legal in draft CRZ 2018 for its different stakeholders

Question Set 5:

1. Categorical details of the items of Union List/Concurrent List/State List covered, directly or indirectly, under Coastal Regulation Zone (CRZ) notifications 1991, 2011 and 2018 (draft).
2. Whether the parliament has delegated or transcended the powers to the Ministry of Environment, Forest and Climate Change (MoEFCC) to effect draft CRZ 2018. Details and reasons thereof.
3. Order of parliamentary merit used to delegate power to decide contents of CRZ Notifications without parliamentary debates.
4. Details of constitution article under which Indian Parliament has power to delegate or transcend such powers.

Question Set 6:

1. Regulatory authority responsible for the regulation of "Coastal Regulation Zone (CRZ) notification".
2. Parliamentary Act under which this regulatory authority is established.
3. Details of the Coastal Rights of coastal communities regulated under draft CRZ 2018 and CRZ 2011. Separate details.
4. Reasons for which regulatory authority and a Coastal Rights Act have not been enacted by Parliament of India.
5. Whether a department or ministry is empowered under constitution of India to regulate CRZ without parliamentary enactment of law? Details thereof.

Will the Honb'le Finance Minister be pleased to state the:

1. Details of coastal management projects financed by the national and international agencies and their headwise expenditure.
2. Expenditures in each head of "Integrated Coastal Zone Management (ICZM) Project" and share of Indian government and foreign agencies in it since its inception.
3. Purpose of the ICZM Project which has been running parallel to the CRZ Notification in the country.
4. Purpose management of Integrated Coastal Zones.
5. The agencies which conceptualized and proposed these purposes of 'integration' and 'management'.

Notes

Notes

Office Bearers of NFF

Narendra Patil (Chairperson)
09923241641 // rpatilnarendra@gmail.com

T. Peter (General Secretary)
08289905239//peter.ksmtf@gmail.com

Affiliates of the NFF:

Gujarat - Machimar Adhikar Sangharsh Sangathan(MASS)
Usmangani Sherasiya- 09427443976

Maharashtra
Maharashtra Machhimar Kruti Samiti (MMKS)
Kiran Koli- 09702265813
Shramik Macchimar Kriti Samiti
Ravikiran Toraskar- 09225900303

Goa - Goenchea Ramponkarancho Ekvott
Olencio Simoes- 09158875851

Karnataka - Coastal Karnataka Fishermen Action Committee
Vasudev Bolor- 09449207805

Kerala - Kerala Swathanthra Malsyathozhilali Federation (KSMTF)
Jackson Pollayil- 09349447166

Tamil Nadu
Ramnadu District Fishworkers Union
Paul Samy- 09442322393
Vangakadal Meen Thozhilalar Sangam Tamilnadu
Dr.Kumaravelu- 09442867035

Andra Pradesh - Democratic Traditional Fisher's and Fish workers Forum
Debashish Pal- 08555809779

Odisha - Orissa Traditional Fish Workers Union
K. Allaya- 09437069286

West Bengal - Dakshinbanga Matsyajibi Forum (DMF)
Millan Das- 078724-07611