

Comments to the Draft Summary Report of the World Bank Assisted Integrated Coastal Zone Management Project Environment & Social Assessment

EQUATIONS

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This brief paper is our comments to the Ministry of Environment and Forests on the Draft Summary Report of the World Bank Assisted Integrated Coastal Zone Management Project' Environment and Social Assessment.

The Central government move to build national capacity for implementation of the new integrated management approach for India's coastal zones and piloting the Integrated Coastal Zone Management (ICZM) approach in the three states of Gujarat, Orissa and West Bengal is dubious with the draft Coastal Management Zone (CMZ) Notification lapsing in 2009. The concept of Integrated Coastal Zone Management Plan was mooted in the draft CMZ Notification. Civil society groups have raised concerns on the CMZ notification and the need to strengthen the existing CRZ notification. Point no. 8 of the draft summary of the World Bank assisted ICZM says the 'GoI has already initiated steps to operationalize one part of the agenda, which is to create a suitable policy environment for integrated management of coastal and marine area'. Allowing commercial activities in the coast and then manage them is in sharp conflict to the philosophy of CRZ Notification, conservation of the coast. Although the MoEF has allowed the lapse of the proposed CMZ notification, the process to strengthen the existing CRZ notification by taking in the concerns of the coastal communities, initiated by the MoEF is yet to be completed in all the proposed 10 states. Then the need for ICZM projects in pilot states for replication at national level is contradictory.

Project description

Mapping, delineation and demarcation of hazard line: The hazard line proposed here is to be determined on the basis of vulnerability of the coast to sea level rise, coastal erosion and flooding, and thus bears similarity to the setback line proposed in the draft CMZ Notification. Therefore it is not definite and will vary from place to place even within Panchayat limits. 'Multi stakeholder opinions on setback lines raised in various consultations on CMZ should also be addressed by the MoEF, before demarcation of the hazard lines'. In the stakeholder meetings conducted by CEE (9th August 2008) on behalf of MoEF in Tamil Nadu, concerns of setback line overtaking rights of local Panchayats were raised. It is important to address these concerns to prevent violation of 73rd and 74th Amendment and usurpation of rights bestowed on Local Self Governing Institutions. In Kerala Meeting 13 August 2008, Dr. N. R. Menon had said "setback line, which is to be based on data of about 100 years, it should be noted that the temperature in the tropics 100 years back was 4 degrees less. It is likely to increase by at least 4 degrees in another 100 years. Hence it will have to be reviewed periodically in view of the climate change phenomenon and cannot be fixed permanently." Over all the consultations have a common demand, for taking into consideration the concerns of the local communities while deciding the setback line. Moreover the Ministry of Agriculture has said that the definition of setback line is ambiguous and therefore could easily be misinterpreted¹.

Mapping, delineation and demarcation, as required, of the ESAs: The report says that contiguous areas containing ESAs within the coastal management zone will be designated as CRZ-I and MoEF will assume the management responsibilities of the area. With the MoEF taking full control of the planning, decision making and implementation of projects in the region, in the case of ESAs in forest areas, the rights of the Grama Sabha passing resolution recommending whose rights to which resources should be recognised granted through Forest Rights Act is apprehended.

Piloting ICZM approaches in Gujarat, West Bengal & Orissa

The pilot areas proposed for World Bank aided implementation of ICZM are in states of Gujarat, Orissa and West Bengal. Interestingly these are also the states which are pushing for investment led development by effecting changes to make investor friendly reforms and has already taken financial aid from World Bank for different projects. The ICZM project seeks to use tourism also as tool to create livelihood opportunities for local communities. Interestingly, in West Bengal the state government in this year has already commissioned the World Bank to undertake an ecotourism and sustainable tourism potential assessment of Sundarbans National Park and surrounding areas to develop an implementable tourism development plan within the World Bank's social and environment safeguards framework.

The pilot sites in the chosen states are not only eco-sensitive but also witnessing massive tourism growth. For example Chilika in Orissa, Sunderbans in West Bengal. Therefore the question of choosing these states and sites appears to be more investment oriented than of conservation. The map showing ICZM Project India indicates that one of the targeted areas is in the border areas adjoining Orissa and West Bengal. That is the area where Mandarmani is located - a coastal village that is experiencing a surge in tourism investment since last few years. Rampant exploitation of the coast by the tourism industry is evident from reports in the state and the state government have completely failed in stopping any of these violations.

Through the ICZM project the government proposes to use ecotourism and tourism for providing livelihood security to fisher communities. The proposal acknowledges (Point nos. 3 & 5), the detrimental impacts of tourism and unplanned growth of tourism infrastructure on the coastal ecology such as degradation of the coasts, conflicts amongst stakeholders and increase pressure on coastal areas. However it again adopts tourism (small scale or ecotourism) to provide livelihood security to coastal communities who are most vulnerable to not only developmental activities but also to effects of climate change. Tourism is seasonal and vulnerable to external and internal impacts like disasters (tsunami, earthquake) health epidemics like SARS or chikungunya, political tensions (riots and terror threats) etc. In such circumstances, often it is the tourism initiatives by local people who are the first affected either by a loss of employment or steep income reductions. In that case the role of the government will be to put in efforts towards strengthening primary sources of income like fisheries and not promoting tourism as a secured livelihood option. More over tourism is an industry that requires specialised skills in marketing and its promotion and opening up sectors like tourism for the coastal communities under the circumstances is not advisable.

There is also lack of clarity in the agency implementing livelihood security of the local communities in West Bengal. There exists no such Corporation as "Sunderbans Development Corporation" as mentioned in the report who is designated to undertake a pilot work in Shore line protection in southern end of Sagar islands. The project is keen on establishing linkages with Development Corporations and Development Authorities but not with local self governance institutions, except with Jamnagar Municipal Corporation, at Jamnagar, Gujarat. The model of Development Authorities fits well with the International Financial Institutions arguing for a centralised system towards administration of power and decision making!

It proposes to 'facilitate investment in financing conservation of the ecologically sensitive areas over the current state of regulatory protection only'. With the statement we assume that the government plans to introduce market driven conservation approach - ecotourism in these areas. It is positive to note that the project questions the possibility of the ICZM resulting loss of livelihoods and traditional access to coastal areas and marine resources. The ICZM seeks to secure livelihoods of local communities by making planning of the ICZM a participatory process based on wide stakeholder consultations. Consultations on environmental and social assessments with stakeholders in all 3 States have pointed out that ecotourism can lead to conflicts, air, noise and water pollution (oil spill from boats) and biodiversity loss if not planned properly. They also highlight on a priority waste management in ecotourism areas. Particularly in West Bengal 'tourist accommodation and Waste disposal system during festival periods is not managed properly now creating pollution'. The question thus arise, is ecotourism a tool for conservation and livelihoods or additional pressure on coastal ecosystems.

Environment and Social Assessment Process

The Project summary states that the pilot states have prepared detailed project reports containing environmental and social impact assessments for the investment areas. These are not available in the project summary and therefore should be made available to local communities and public for wide debate.

The key highlight of the environment and social assessment conducted by Centre for Environment and Development, Thiruvananthapuram states that, "the major issue of the exposure of the currently protected ecologically sensitive areas to exploitation if decentralized planning and management of coastal zones is accepted". Contrary to this, the demand by fisher folk communities for involvement in activities to check sea erosion, being not consulted by government even though they are worst effected, shows that people are willing to participate in conservation activities if they are provided the platforms to participate² .

General comments

- Only the project summary is available on the MoEF website and not the entire report as said in the notice. For public debate these should be made available on website and at regional government offices for public access.

- A good point which is acknowledged by the project is that it supports strengthening of the existing CRZ Notification, 1991.
- The Government of India recognising one of the three prime objectives of ICZM plans as to ensure that livelihood of the coastal communities is secured is commendable.
- The project summary has taken into consideration only the consultations conducted by CEE on behalf of MoEF till 2008 in different states. However other major public's opposition to the CMZ notification that resulted in the consequent lapse of the CMZ notification is not taken into consideration.
- The management approach adopted by the ICZM is not in line with the existing regulatory framework effected by the CRZ notification. Therefore the proposal of the MoEF to implement a project that is based on the parameters of the lapsed CMZ notification is contrary to the MoEF's decisions and against larger opinions of the public.

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Contact us

info@equitabletourism.org

+91-80-2545-7607 / 2545-7659

EQUATIONS, # 415, 2C-Cross, 4th Main, OMBR Layout, Banaswadi, Bangalore 560043, India

www.equitabletourism.org

End Notes

¹ Ministry of Environment and Forests (2009), 'FINAL FRONTIER, Agenda to protect the ecosystem and habitat of India's coast for conservation and livelihood security', Annexure III, Ministry of Environment and Forests, July 16, 2009, New Delhi, Pg 33, draft Coastal Management Zone (CMZ)

< http://www.ceeindia.org/cee/pdf_files/Review%20Committee%20Report%20on%20CMZ.pdf > , data retrieved 23 December 2009

² <http://www.hinduonnet.com/2009/11/19/stories/2009111954350200.htm>