



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



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NFF, The SFSS Soc. Ltd.,
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Date: 20th Feb 2024

To

- Shri Piyush Goyal**
Minister for Commerce and Industry,
Vanijya Bhawan, New Delhi
110011, INDIA
- Shri Parshottam Khodabhai Rupala,**
Minister of Fisheries, Animal Husbandry and Dairying,
Room no.234,B wing,Second floor,Krishi Bhavan,
Dr.Rajendra,Prasad Marg, New Delhi-110001

Subject: Comprehensive Considerations and Urgent Plea for Indian Small-Scale Fishers in WTO Fisheries Subsidies Negotiations at MC13

Respected Sir,

The National Fishworkers' Forum (NFF), registered under the Trade Union Act of India, is the only national federation of state level small and traditional fish workers' unions of India. NFF has fifteen affiliated organizations in all the coastal states and union territories of the Indian mainland. NFF has worked to protect the life and livelihood of the fishing communities and its basic source – fisheries resources, biodiversity and natural environment since the 1970s.



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Representing fishers' organizations, who have deeply invested in the sustainable development of India's fishing sector, NFF wish to provide comprehensive insights into India's position at the WTO negotiations on fisheries subsidies which is expected to conclude very soon in Abu Dhabi during the 13th Ministerial Conference of the WTO (MC13), to be held this month between 26th and 29th February 2024 .While we respect and support the government's stance, While we respect the government's stance, we believe **certain considerations merit attention** for a more holistic and forward-looking approach.

1. ADVOCATING FOR SMALL-SCALE AND INDIGENOUS, ARTISANAL INDIAN FISHERS:

It is essential to articulate a robust case for **small-scale and indigenous, artisanal Indian fishers** and their **specific needs** in international negotiations. We highlight the challenges faced by small-scale and indigenous, artisanal Indian fishers, emphasizing the importance of **policies and subsidies that directly address their concerns**, ensuring both environmental sustainability and equitable socio-economic benefits.

2. SPECIAL AND DIFFERENTIAL TREATMENT FOR SMALL FISHERS:

We fervently implore India to champion the cause of its **small-scale fishers** by **securing a special and differential treatment** exemption that extends beyond the current proposed limit of 12 Nautical Miles (NTM). Given the inherently semi-formal nature of their work and the limitation of advanced navigation equipment, small fishers operate beyond these proposed limits upto **24-200 Nautical Miles** (NTM).

3. CHALLENGES IN MEETING NOTIFICATION REQUIREMENTS:

We acknowledge **India's legitimate challenges** in complying with the **WTO negotiation requirements**, and **advocate for the revision** of the **sustainability exemption clause** to a **more equitable sustainability transitory clause**. We propose the **subsidies revision** towards **transitory**

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sustainable approaches for our commercial Indian fishworkers friends while protecting the rights of fishing from the baseline upto 200 nm for small-scale, artisanal and indigenous fishworkers.

4. NEED FOR STRONG DOMESTIC FISHERIES POLICY TO DEFINE SMALL-SCALE FISHER RIGHTS:

We stress upon the need for a robust domestic fisheries policy that aligns with international negotiations. **Without a cohesive national policy to define small-scale, artisanal and indigenous fishworker rights, their unique characteristics and fishing methods, India's position at the WTO may lack the necessary foundation for effective representation.** We advocate for a policy like the 'Coastal Rights Bill' that not only protects the interests of the government's goals in sustainability of fish stocks but percolates down to the specific needs of small-scale fisheries (SSF) in India.

5. COMMON BUT DIFFERENTIATED RESPONSIBILITY (CBDR) PRINCIPLE:

We underscore the pivotal role of applying the **Common but Differentiated Responsibility (CBDR)** principle in these negotiations, particularly in **holding developed countries accountable** for their **historical actions** contributing to **overfishing and overcapacity**. We demand a **loss and damage fund** for **reparations** for **developing and least-developed countries** to **transition effectively based on a co-created timeline**. We also urge the **revision of countries** in the **developing list** like **China** and their role in **exhausting fish stocks** through **intensive IUU fishing** in the **Indian waters** and the broader issue of overfishing, including the **challenges** posed by **China's fishing fleets** in the **Indian Ocean Region (IOR)**. The prevailing text also **disproportionately favours developed nations**, affording them **undue leeway to evade substantial commitments**.

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6. FOCUS ON DEFINING SMALL SCALE FISHERIES (SSF) ROLE IN SUSTAINABLE DEVELOPMENT:

We highlight the **importance of concentrating efforts on small-scale fisheries** and their **role in sustainability of fish stocks in coastal and ocean zones**, rather than only focussing on **deep-sea fishing in the WTO negotiations**. We **advocate for retaining subsidies that cater to the needs of small-scale fishers** with an **urgent need to define their unique characteristics, type of crafts and extent of fishing zones**. We also **propose a phased, transitory approach to phase out over-subsidised commercial fishing, emphasising that these reforms can be championed at the national level without the need for WTO intervention**.

In conclusion, NFF believes that these nuanced considerations will strengthen India's position at the WTO negotiations, promoting a balanced and inclusive approach that aligns with both national and global objectives. We remain committed to supporting the government's efforts and urge a holistic strategy that ensures the sustainable and equitable growth of India's fishing sector, with equitable rights given to our communities of small-scale, artisanal and indigenous fishworkers in India.

Yours sincerely,

Leo Colaco,

Chairperson - National Fishworkers' Forum (NFF)

Olencio Simoes,

General-Secretary - National Fishworkers' Forum (NFF)

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