## CRZ Notification 2011: Not the End of the Road

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The Coastal Regulation Zone Notification 2011 fails to meet the demands of the fishing community and environmentalist groups that it should offer greater protection to the coastal ecosystem, recognise the inalienable right of fisherfolk to their habitats and provide them with representation in decision-making. However, the prior consultations on the notification have led to a higher level of awareness about coastal issues among the fishing communities, government officials and the general public, all auguring well for its enforcement.

n 7 January 2011 Minister of State for Environment and Forests (MOEF), Jairam Ramesh, released the Coastal Regulation Zone (CRZ) Notification, 2011 (Government of India 2011a). This marked the end of a several-year long process, during which "CRZ" had become a household word, particularly among India's coastal fishing communities.

Divergent newspaper headlines greeted this announcement: "New CRZ Norms Irk Fishermen" (Ashar 2011), "National Fishworkers' Forum (NFF) Expresses Shock over New CRZ Notification" (2011),1 "New CRZ Norms a Boon for Real Estate Companies" (Dongre 2011), and "CRZ Norms May Hit Development" (Sudhi 2011). Such polarised perspectives have marked the public debate on the CRZ notification ever since the draft Coastal Management Zone (CMZ) Notification 2008 was put up for public comments. Even as industry groups, and in some cases, ministries of the central government and state governments, advocated for allowing greater "development" on the coast, fishworkers' and environmental groups sought better regulation and conservation of India's fragile and diverse coastline and coastal resources, and better recognition of the rights of traditional fishing communities to coastal lands and resources.

#### **Competition for the Coast**

This polarisation is a reflection of the reality in India today. From a time when the Indian coast was inhabited mainly by traditional fishing and other natural-resource dependent communities, today there is great competition for the coast and its resources. Coastal tourism, atomic and thermal power plants, desalination plants, infrastructure for generating solar, tidal, wind and other forms of non-conventional energy, oil drilling and exploration activities, industry, ports, and beach housing are all competing to locate on the coast.

Such developments, apart from physically taking over coastal lands and waters, are putting significant environmental pressures on coastal resources and habitats. Pollution along many parts of the coastline, due to effluent discharge and sewage outfalls, has reached alarming proportions. Sea erosion has been greatly accelerated by unplanned siting and construction of ports and harbours. Fragile and productive coastal habitats, such as mangroves, are being destroyed and converted to other uses. And this is happening in a context where climate changerelated phenomenon such as sea-level rise and the intensity and frequency of extreme weather-related events is only expected to worsen, with coastal areas and populations expected to be particularly vulnerable to climate change.

#### **Draft CMZ 2008**

It is no wonder, therefore, that India's coastal fishing communities and environmental groups took the developments around the CRZ notifications very seriously. In 2008 the NFF and other fishing community organisations, non-governmental organisations (NGOs) and environmental groups formed a broad-based platform called the National Campaign for the Protection of the Coast (NCPC)2 to counter attempts to replace the CRZ Notification 1991 with the draft смz Notification 2008. The NFF undertook a massive yatra the Machhimar Adhikar Rashtriya Abhiyan covering all coastal states, demanding that the CMZ 2008 be scrapped.

The draft CMZ notification was based on the recommendation of the expert committee set up under the chairmanship of M S Swaminathan in 2004, to review the existing notification of 1991 and to suggest the agenda for coastal zones. The NCPC and other like-minded groups maintained that the смz notification was nothing but an attempt to replace the "regulatory" framework of the 1991 notification with a "management" framework that would, in effect, allow any form of development on the coast as long as there was a "management plan". They stressed that any improvement of the coastal regime must build on the regulatory framework of the 1991 notification, using, as its base, the notification without its

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25 amendments that had only served to dilute it.

In September 2008, in view of the protests from the people living in the coastal areas, the department-related Parliamentary Standing Committee on Science and Technology, Environment and Forests decided to examine the draft CMZ notification. In March 2009 the committee recommended that the CMZ notification be kept in abeyance "till mechanisms/instruments – executive and legislative – are put in place for inclusion and integration of coastal communities through participative, decision-making and control instruments" (Government of India 2009).

Interestingly, the second committee set up by the MOEF under the chairmanship of Swaminathan in mid-2009 recommended that the draft CMZ Notification 2008 be allowed to lapse, and that necessary amendments be incorporated into the existing 1991 notification, for better coastal management (Government of India 2008).

The MOEF subsequently organised 10 public hearings in all coastal states and

union territories (UTS), five of which were chaired personally by Ramesh, to seek suggestions on strengthening the CRZ 1991. In April 2010, and subsequently in September 2010, the MOEF put up on its website the pre-draft CRZ notification and the draft CRZ notification respectively for public comments. Again, the MOEF received numerous critical comments and representations. The NFF organised a all-India fisheries strike on 29 October against the draft notification. The cause of the fishing communities was supported by some state governments. The Chief Minister of Tamil Nadu, M Karunanidhi, wrote to the prime minister on 19 November 2010, requesting that the draft CRZ Notification 2010 be deferred till such time as apprehensions and concerns of the fisherfolk and environmentalists are addressed. The Minister for Fisheries and Registration, Kerala, S Sharma, in his letter to Ramesh dated 14 November 2010, also pointed out that the housing needs of the fishing communities must be addressed. Possibly in response to such pressure from

various quarters the MOEF arranged several meetings with the fishing community associations in December 2010, to see if issues being raised by them could be addressed.

#### **CRZ Notification 2011**

The CRZ Notification 2011 was officially notified on 6 January 2011. While it uses the 1991 notification as its base, it also codifies the 25 amendments to the notification. Its stated objectives are to ensure livelihood security to the fishing communities and other local communities living in coastal areas; conserve and protect coastal stretches; and promote development in a sustainable manner based on scientific principles, taking into account the dangers of natural hazards in the coastal areas and sea level rise due to global warming.

The notification defines the CRZ to include the land area from the high tide line (HTL) to 500 m on the landward side, as well as the land area between HTL to 100 m or width of the creek, whichever is less, on the landward side along tidal influenced water bodies connected to the

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sea. The CRZ also includes, for the first time, the water and bed area between the low tide line (LTL) to the territorial water limit (12 nautical miles) in case of the sea, as well as the water and the bed area of tidal influenced water bodies, such as creeks, rivers and estuaries.

Further, by introducing the concept of a "hazard line", to be demarcated taking into account tides, waves, sea level rise and shoreline changes, the area under the CRZ is defined to expand where the hazard line falls beyond the 500 m line on the landward side. The stated purpose of demarcating such a hazard line is to protect life and property of coastal communities and infrastructure in coastal areas.

Like the 1991 notification, the 2011 notification classifies the 0 to 500 m coastal strip into four categories: CRZ I (ecologically sensitive areas); CRZ II (built-up areas); CRZ III (rural areas); and CRZ IV (territorial waters and tidal influenced water bodies). In the 1991 notification CRZ IV covered the islands of Andaman and Nicobar and Lakshadweep. A separate notification – the Island Protection Zone Notification has now been issued for protection of the islands.

The notification also introduces two categories of "Areas requiring special consideration". One, special dispensations are provided for Greater Mumbai, Goa and the backwater islands of Kerala. Two, it provides for notifying Critical Vulnerable Coastal Areas (CVCA), including the Sunderbans mangrove area and other ecologically important areas, through a process of consultation with local fisher and other communities inhabiting the area.

Time-bound procedures for obtaining clearances for projects have been specified. Post-clearance, project authorities are further required to submit half-yearly compliance reports, which are to be made available to the public, including through the website, a provision that was not part of the 1991 notification.

The notification takes cognisance of the problem of erosion in coastal areas due to human interventions, and proposes to classify the coastline into "high eroding", "medium eroding" and "low or stable stretches". Ports and harbour projects, with the exception of projects for strategic and defence-related purposes, will not be

permissible in high eroding areas, while comprehensive environmental impact assessment (EIA) reports with cumulative studies will be required for projects in stretches classified as low- and medium-eroding.

Enforcement had been the weakest element of the 1991 notification. The frequently asked questions (FAQS) list provided by the MOEF claims that the 2011 notification addresses this shortcoming (Government of India 2011b). Under the 1991 notification, the state government or the union territory (UT) Coastal Zone Management Authority (czma) has been given the primary responsibility for monitoring and enforcement. To assist in this task, the state government and uT are required to constitute district-level committees under the chairmanship of the district magistrate (DM), with at least three representatives of local traditional coastal communities, including fisherfolk.

## **Concerns of Fishing Communities**

In the press note releasing the 2011 notification Ramesh pointed to the long process after which it was finalised (Government of India 2011c). The final notification takes into account the outcomes of the public consultations, five rounds of consultations with fishermen's associations, the recommendations contained in "Final Frontier", as well as the comments received after the pre-draft and draft notification were put up for comments in April and September 2010.

Given this scenario, it was expected perhaps that the fishing communities would welcome the notification. That this is not the case is evident from the media reports that have followed. The basic demands of the fishing community were that any amendments to the 1991 notification should serve to offer greater protection to the coastal ecosystem, and to recognise the inalienable right of fishing communities to their habitats and to be represented in decision-making. The 2011 notification, they feel, falls short on both these counts.

It continues to allow, for example, activities that are not directly related to the waterfront or which need foreshore facilities, such as atomic and nuclear power plants and the greenfield airport at Navi Mumbai. Similarly it continues to allow for roads on stilts or pillars, including in

CRZ I areas, even though in negotiations preceding the release of the notification the ministry had agreed to drop this provision, given the tremendous scope it could provide for misuse.<sup>3</sup> In Chennai, for example, it could open the way to the development of an elevated highway along the beach, displacing many fishing hamlets.

Fishing community groups had also negotiated for assured representation in both the national and state-level CZMAS to ensure that, as major stakeholders on the coast, they are not marginalised in decision-making processes. Yet the final notification makes no mention of this. It only provides for representation of local traditional coastal communities, including fisherfolk, in the district-level committees to be formed for monitoring and enforcement of the notification.

A major area of disagreement is the provision that reduces the o to 200 m nodevelopment zone (NDZ) in the predominantly rural CRZ III areas to o to 100 m, thus allowing for construction/reconstruction of dwelling units of traditional coastal communities, including fisherfolk, between 100 and 200 m. This provision is in direct response to representations made by the fishing community groups, seeking some relaxation in the NDZ to allow for expansion of their hamlets, in exceptional situations where there is no other area available for expansion, and where the process is backed by comprehensive planning. Such an exception, as a safeguard, should only be provided to fishing communities who, by virtue of their occupation, have to be necessarily located on the coast. By making the provision applicable to "traditional coastal communities, including fishing communities", the door has been opened to greater density of constructions on the coast and higher pressure on coastal resources.

Another bone of contention is the provision that provides for the notification of the CVCAS. The NFF had proposed the term community-managed coastal reserves (CMCRS), thereby ensuring that, by its very terminology, the process is community-initiated and community-led. This proposal was informed by bitter experiences with top-down conservation and management, as in marine national parks and sanctuaries in Gahirmatha (Orissa) and the Gulf of

Mannar (Tamil Nadu), where local fishing communities have been alienated, marginalised and denied their livelihoods (ICSF 2009). Though the CVCA provision in the final notification provides for a bigger role for local communities than visualised in the draft, the fishing community groups continue to be wary.

These groups however acknowledge that some provisions are indeed positive. To provide for more housing within fishing villages in CRZ III, certain restrictions in the 1991 notifications on expansion of housing have been removed. In the special dispensation provided to Greater Mumbai, protection has been provided to koliwadas (fishing hamlets) with a view to ensuring that fishing communities continue to retain their rights to their traditional lands and a role in planning for their development. The notification also specifies that the dwelling units of traditional coastal communities including fisherfolk and tribals, permissible under the 1991 CRZ notification too, shall be regularised. Further, that the dwelling units of local communities including that of the fishers, will not be relocated if these are located on the seaward side of the hazard line, and if necessary safeguards from natural disaster are ensured. The states are also required to prepare detailed plans for long- term housing needs of coastal fishing communities, keeping in mind the need for expansion, sanitation, safety, and disaster preparedness.

## The Mumbai Situation

The release of the 2011 notification was covered widely by the media across the country. Perhaps the maximum coverage was in Mumbai. Understandably so, as almost half of Mumbai is estimated to be within the CRZ and any change in these rules has major implications, particularly for development of housing in this populous and land-starved city. Under the special dispensation that has been provided to Greater Mumbai the redevelopment of the approximately 146 existing slums in CRZ areas has been permitted, provided that the stake of the state government or its agencies in such redevelopment projects is not less than 51%. Redevelopment of the existing 600-odd dilapidated, cessed and unsafe buildings within the CRZ has also been permitted. It has been

specified that the floor space index (FSI) or floor area ratio (FAR) prevailing in the Town and Country Planning Regulations as on the date of the project being sanctioned, will apply, providing a major relief to private builders.

In the 1991 notification the FSI was fixed at that which existed on 2 February 1991 (less than two). This had led to a situation where builders claimed that they did not have adequate FSI incentive to rebuild. They maintained that to provide free housing for existing slum dwellers living in cramped conditions, they needed to construct more within the same area, in order to recover their costs.

The environmentalists and fishing community groups, on the other hand, feared that allowing for redevelopment of slums illegally located within the CRZ and providing a higher FSI for the purpose, would not only set a bad precedent, but would also be used by the private builder lobby to promote massive projects on prime coastal lands. These projects would ultimately end up in the hands of people other than slum dwellers. The fishing community groups were particularly concerned that if their koliwadas were clubbed together with slums for redevelopment, they would end up losing their rights to their traditional lands to the powerful real estate lobby. In view of the complex set of issues involved, the second Swaminathan Committee had recommended that the government review its policies for private developer-based building projects in CRZ areas, and consider the use of public finance for providing low-cost housing.

The 2011 notification has tried to put in place some safeguards, including the 51% clause. It specifies that slum redevelopment projects will come within the purview of the Comptroller and Auditor General and that the Right to Information Act, 2005 shall be applicable to all redevelopment or reconstruction projects in the CRZ. There are several other provisions to ensure transparency and accountability and also that legally regularised tenants are provided houses in situ or as per norms laid down by the state government.

While the notification was initially welcomed by private builders in Mumbai, given that under the new rules a higher FSI (2.5 or more) would apply, subsequent

reports indicate a few problem areas. According to news reports, the Builders Association of India (BAI), the apex body for engineering construction contractors and builders, is calling for a review of the 51% clause, claiming that this would render a project "commercially unviable". There are also calls for greater clarity on several other provisions (Ashar 2011).

Environmental groups in Mumbai are of the opinion that the concessions provided to Greater Mumbai are nothing short of an environmental disaster. Apart from the fact that the Mumbai coastline is set to be totally built up in the name of slum clearance, provisions allowing for roads, approach roads and missing link roads, including roads on stilts in mangrove areas, supposedly to allow for free flow of tidal water underneath, will also have highly adverse environmental effects, they claim (Vyas 2011).

#### The Road Ahead

It is already evident that the 2011 notification does not meet the expectations of various interest groups. The fishing community groups and environmentalists have indicated that they will continue to seek the strengthening of the just-released notification, to ensure that loopholes provided to activities that do not require the shorefront, are plugged. Although there has been no formal response to the notification from industry bodies, it is evident that private builders in Mumbai will seek more favourable terms and conditions. The onus is now on the MOEF to negotiate through such competing demands while ensuring that the protection offered to coastal resources and habitats is not further compromised.

Another critical challenge, as with the 1991 notification, will be implementation and enforcement, even though the MOEF claims that the 2011 notification has provisions to address the earlier shortcomings. The MOEF and the states/UTS will have to demonstrate the political will, and make available the necessary resource to strengthen the enforcement capacity of the CZMAS. It is important that efforts in this direction are immediately taken up, if the mistakes of the past are not to be repeated, and if public confidence is to be restored.

The MOEF has an opportunity to demonstrate that it is serious about punishing violations. On 25 January it issued directions

to the czmas of all states and uts (under Section 5 of the Environment Protection Act 1986) to identify all violations to the 1991 notification, and to take necessary action, within a period of eight months (Government of India 2011d). The CZMAS have also been directed to upload information about violations identified and action taken, on their websites every fortnight. Identification and punishment of the thousands of violations that have taken place over the past 20 years within a short period of eight months, is no mean task. It is also a case of too little too late. Yet, if sincere efforts to do so are made, it will signal a good start to the 2011 notification, sending out a clear message that violations will no longer be tolerated.

Given the experience with the 1991 notification that was amended 25 times to accommodate various interests, the fishing community and environmental groups have highlighted the need for a CRZ law. Jairam Ramesh has indicated that he is in favour of this and will try and take it forward. The biggest challenge will be to ensure that the Act, if and when it comes up, does not compromise the ecological integrity of the coast, and the livelihood rights of traditional fishing and other natural resource dependent communities.

#### **Conclusions**

The run-up to the CRZ Notification 2011 was characterised by unprecedented consultations. This has yielded some benefits as there is undoubtedly today a higher level of awareness about coastal issues in general and the CRZ regime in particular, including among coastal fishing communities, government officials and the general public. This could augur well for the implementation and enforcement of the 2011 notification, given that it was factors such as the lack of political will as well as of public awareness and pressure for enforcement that were the bane of the 1991 notification. Provisions to promote transparency that are part of the 2011 notification could foster the process of public engagement. However, it is equally the case that fishing communities and environmental groups have been left with a sense of disillusionment, given that despite the many consultations, several of their concerns, articulated time and again, have been ignored in the final notification.

For fishing community groups the campaign around the CRZ notification has been important in a context where they find themselves increasingly marginalised by the massive development on the coast. Through mass protests and coordinated action across all coastal states they have succeeded in putting political pressure on their elected representatives, several of whom have come out in support of their cause. The right of the fishing communities to live and work on the coast has received wide recognition and support at the political level. Another important gain has been the alliance that has developed between the fishworkers and environmental groups, a fallout of the common campaign on the CRZ, lending more weight to their collective demands. This is an alliance that could prove even more useful and effective in the coming period.

#### NOTES

- http://news.webindia123.com/news/Articles/ India/20110109/1663672.html
- 2 http://ncpcindia.wordpress.com/
- 3 http://expressbuzz.com/cities/chennai/fishworkers-forum-threatens-nation-wide-strike/ 238092.html

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