



## **Letter to Shri. Jairam Ramesh on Pre Draft CRZ Notification 2010** **EQUATIONS comments on the Pre Draft CRZ Notification 2010 in the context of tourism**

EQUATIONS  
28 May 2010

*This is our letter to Shri. Jairam Ramesh, Minister of State for Environment and Forest (MoEF), on our comments on the Pre Draft CRZ Notification 2010 in the context of tourism. We continue to demand for a comprehensive legislation and not a notification to regulate coastal activities, to protect coasts and the livelihoods of the coastal communities dependent on it.*

28th May 2010

Shri Jairam Ramesh,  
Minister of State for Environment and Forests,  
Paryavaran Bhavan,  
CGO Complex,  
Lodhi Road  
New Delhi - 110 003

Subject: EQUATIONS comments on the Pre draft CRZ Notification 2010 in context of tourism.

Dear Shri. Ramesh,

EQUATIONS is a research, advocacy, and campaigning organisation, ([www.equitabletourism.org](http://www.equitabletourism.org)) working since 1985 on the impacts of tourism, particularly in terms of rights and benefits to local communities. Since the 1990s we have supported the struggles of coastal communities to protect the coastal ecology and secure their rights and livelihoods. We also have also been actively involved in the debate on coastal regulation with particular reference to tourism development.

Please find attached our detailed comments on the Pre-Draft Coastal Regulation Zone (CRZ) Notification 2010. Our comments are specifically related to tourism development issues. There are many other movements and groups more competent to comment on other critical aspects and provisions of the Pre-draft Notification, and we are in solidarity with those concerns.

### **Some of our key concerns in the context of tourism are as follows:**

- The MoEF has once again issued another Notification to amend the CRZ Notification 1991. The demand for a comprehensive legislation has been a call of many civil society organisations and peoples movements. In the public consultations organised by MoEF with fishing and coastal communities and CSOs in 2009-10, this was reiterated quite strongly. We believe that only when the MoEF initiates the process for comprehensive legislation to regulate coastal activities, will the coasts and the livelihoods of the coastal communities dependent on it, be protected.
- We are very concerned about the decision of MoEF to de-link the Andaman & Nicobar and Lakshadweep islands from the ambit of CRZ Notification 1991. Separation of the island states will further destroy the fragile ecology of the islands and increase pressure on the livelihoods of local communities. Further this move of MoEF will legitimise existing CRZ violations of tourism establishments, most of which continue to operate in impunity in total violation of the CRZ Notification 1991. Moreover the proposed Draft Island Protection Zone

(IPZ) Notification for Andaman and Nicobar, Lakshadweep islands is not a progressive Notification. It dilutes the regulatory provisions contained in CRZ IV of CRZ Notification 1991. We make an urgent appeal that MoEF retain the provisions relating to CRZ -IV as provided in CRZ Notification 1991 with respect to the Islands.

- The Pre-draft Notification makes it mandatory for certain projects in CRZ areas to take a separate clearance under EIA Notification 2006. This provision is made without out taking into consideration the inherent problems in the existing EIA Notification 2006. The pre draft Notification continues to side line the necessity for social impact assessment of the projects.
- The pre draft Notification continues to permit seemingly 'non polluting' industries like Information Technology and tourism – service industries in SEZs in CRZ zones. MoEF should revoke this provision which was brought in the CRZ Notification 1991 through the amendment No. SO 550 E dated 21 May 2002. It allowed resource intensive and negatively impacting activities like tourism to come up in CRZ areas on the assumption that these are non polluting. That this is not the case has been amply proven.

In the enclosed note we have made more detailed comments and recommendations.

We hope that you will take into account the issues raised by us to secure the protection of fragile coastal ecosystems and the rights and livelihoods of coastal communities. We hope Sir, that your Ministry will give us the opportunity to engage further on the links between unregulated tourism development and degradation of ecosystems.

We look forward to hearing from you.

Sincerely,

Rosemary Viswanath  
Chief Functionary  
EQUATIONS

**Copy to:**

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