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## DFM Working Paper

# National Policies & Regulations on Dried Fish in Sri Lanka

This Working Paper compiles relevant passages from policy statements, regulations, agreements, and conventions that concern fish processing and the status of women in Sri Lanka, arranged by type of instrument and the various articles under each instrument.

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**Dried Fish Matters:**

Mapping the social economy of dried fish in South and Southeast Asia for enhanced wellbeing and nutrition

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Although there are no policies in Sri Lanka that directly concern dried fish, relevant policy statements and regulations are found in the various Acts, Ordinances, agreements, and conventions that govern fish processing, fish health, the status of women, work conditions and wages, food quality, and other issues.

These various instruments have different types of legal status. **Policy statements** must be followed by action plans if the objectives of the policies are to be reached. **Acts, Ordinances** and **Agreements** have legal force, while **conventions** and **statements** are implemented on a voluntary basis.

Whereas policy statements on specific topics have been formulated by the Ministry of Fisheries and Aquatic Resources in the past, the National Fisheries Policy was formulated only in 2008 (NFP 2018), and despite having received cabinet approval has yet to be ratified by the parliament.

Fish processing is an age-old practice in Sri Lankan fishing communities. The major processed products are **dried fish** (*karawala*) and **maldive fish** (*umbalakada*), while “**jadi**” (a kind of fermented fish) is also produced in small quantities. Dried fish was traditionally produced by women fisher folk to bring in supplementary income, allowing fishing families to smoothen fluctuations in daily fishing incomes. Processing of fish into dried fish was often undertaken at times of excess supply and, therefore, dried fish making was always an ancillary activity that complemented fishing as the main activity. Further, it was practiced by women, who did not occupy an important place in the male dominant fishing communities.

For such reasons, dried fish making has not received much attention from fisheries authorities and the major fisheries

Act; the Fisheries and Aquatic Resources Act of 1996 with its subsequent amendments does not directly deal with fish processing. Yet, due to increased post-harvest losses – which are said to exceed 40 percent of the quantity of fish landed – interest has recently emerged in the development of fish processing and value addition. Moreover, women fish processors have received greater attention with the growth in concern for gender equity and equality, represented by various conventions on gender mainstreaming, gender equality and women’s empowerment, including the 2010 Beijing Convention.

This increased attention brings into light issues related to wage discrimination, the power middlemen oligopsonies (dried fish merchants), and the weak bargaining capacity of women vis-à-vis outsiders. Another important development is the current focus on nutrition and healthy food, two of the important components of food security. As dried fish is the principal animal protein supplier to the poorer groups in the rural and the estate sectors of the country, its local availability at affordable prices is also of significant importance, having implications for trade in fish and fish products.

The various policy statements, regulations, agreements, and conventions highlighted in this document deal with all issues concerning fish processing and the status of women as enumerated above. Policy statements, regulations, prescriptions, and conventions that deal with these issues are listed by type of instrument, with the text of specifically relevant articles under each instrument.

# The process of Fisheries Policy Formulation in Sri Lanka

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Sri Lanka has so far developed National Fisheries Policies in three instances.

1. National Fisheries Policy 2004 (White Paper only)
2. National Fisheries Policy 2018
3. Proposed SSF Policy 2019

## National Fisheries Policy of 2004

The policy formulation process was initiated at the beginning of 2004. Its foundation was a document called “an alternative fisheries policy”, prepared by a civil society organization called the National Fisheries Solidarity through a country-wide consultation process, involving discussions with nearly 75 fisheries community organisations, both marine and inland. This was a truly bottom-up process but lacked extensive participation from Sri Lanka’s senior fisheries administrators, academics, and scientists. A white paper on National Fisheries Policy was prepared in December 2004 and submitted to the Cabinet of Ministers. Sri Lanka was hit by the Indian Ocean tsunami four days after submission of the white paper, however, and discussions were postponed indefinitely.

## National Fisheries Policy 2018

This policy process was supported by the Norwegian Government, at the request of the President of Sri Lanka. The National Fisheries Policy went through a comprehensive national consultation process, with the participation of all relevant stakeholders including fishing communities, policy-makers, academics, and scientists. The policy has been approved by the cabinet of ministers and now pending parliamentary approval. It has yet to be adopted as the National Fisheries Policy.

## Proposed Small Scale Fisheries Policy of 2019

Following the adoption of a new international policy instrument entitled the “Voluntary Guidelines for securing sustainable small scale fisheries in the context of food security and poverty alleviation”, the Sri Lanka Forum for Small Scale Fisheries (SLFSSF) carried out a national consultation process to implement the SSF Guidelines in Sri Lanka with assistance from the International Collective in Support of Fishworkers (ICSF) and FAO. The process of national consultations was participated by fishing communities including women, state actors (fisheries and other actors operating in the coastal zone), academics, and scientists. A set of policy statements have been prepared.

It is important to note that the policy formulation process in Sri Lanka has always been based on comprehensive national consultation processes, with the active participation of community stakeholders. Community participation was quite strong in the 2004 policy and the 2019 SSF policy, which included notable representation from processor women. However, little attempt has been made in the remaining instances to ensure the participation of fish processors in the policy development process.

## Possible Policy Interventions

The National Fisheries Policy and the recently concluded process of the SSF Guidelines Implementation have identified a number policy interventions required to promote and support the fish processing sector (including dried fish), which are summarized below.

To improve Fish Handling Practices, minimize post-harvest losses, and ensure a clean, disease free and good quality fish for processing:

1. Improve fish handling and storage facilities at landing sites and provide the necessary services such as water, sanitation, ice, etc.
2. Build awareness among fishers on good fish handling practices.
3. Promote private sector participation in developing landing site infrastructure and investment in fish processing facilities.
4. Promote Public-Private Partnerships (PPP) for the interventions under 3 above.

Instrument	Description
<b>National Fisheries and Aquaculture Policy</b> 2018	<p data-bbox="558 304 854 331"><b>Infrastructure Facilities</b></p> <p data-bbox="558 352 1536 415">4.1.30. Develop anchorages and minor fish landing sites and hand over to fisher communities in the respective areas for operation and maintenance.</p> <hr/> <p data-bbox="558 485 761 512"><b>Fishing Vessels</b></p> <p data-bbox="558 533 1182 560">4.1.32. Improve quality assurance of fishing vessels.</p> <hr/> <p data-bbox="558 617 867 644"><b>Consumers and Markets</b></p> <p data-bbox="558 665 1536 989">4.3. Good nutritional status leads to higher individual performance and mental acuity, which in turn supports macroeconomic and social growth. In addition to providing nutrition, fisheries and aquaculture play an important role in providing food security, as a provider of income and livelihood. According to FAO, food security exists when all people at all times, have physical and economic access to sufficient, safe and nutritious food to meet their dietary needs and food preferences for an active and healthy life. Fish, produced and distributed should be of a good food safety and quality standard with no or minimum post-harvest losses, and thus of a high economic value. Fish should be available in all areas of the country at prices affordable to all income segments.</p> <hr/> <p data-bbox="558 1058 1076 1085"><b>Food Security, Food Safety and Nutrition</b></p> <p data-bbox="558 1106 812 1134">The Government will:</p> <p data-bbox="558 1155 1536 1218">4.3.1. Create employment with adequate income levels in the sector to ensure food security of more people.</p> <p data-bbox="558 1239 1523 1266">4.3.2. Ensure quality and food safety of locally marketed fish and fishery products.</p> <p data-bbox="558 1287 1515 1314">4.3.3. Promote consumption of sufficient fish for meeting nutritional requirements.</p> <p data-bbox="558 1335 1536 1398">4.3.4. Stock fish as buffer stocks during gluts to ensure the availability of fish at reasonable prices during lean periods.</p> <p data-bbox="558 1419 1536 1482">4.3.5. Ensure the traceability and transparency at all stages of the value chain process</p> <hr/> <p data-bbox="558 1551 1183 1579"><b>Elimination or Minimizing of Post-Harvest Losses</b></p> <p data-bbox="558 1600 812 1627">The Government will:</p> <p data-bbox="558 1648 1495 1675">4.3.6. Improve quality infrastructure facilities in the production and supply chain.</p> <p data-bbox="558 1696 1239 1724">4.3.7. Develop awareness on best fish handling practices.</p> <hr/> <p data-bbox="558 1793 800 1820"><b>Increasing Exports</b></p> <p data-bbox="558 1841 812 1869">The Government will:</p> <p data-bbox="558 1890 1510 1917">4.3.8. Promote investments in export-oriented fisheries and aquaculture projects.</p>

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- 4.3.9. Promote the production of fish and fishery products meeting the food safety and quality standards acceptable in the international market, and ensure an efficient supply chain management.
  - 4.3.12. Promote a market driven production of fisheries and aquaculture products including innovative products.
  - 4.3.13. Promote the eco-friendly or organic production of fisheries and aquaculture products, which fetch comparatively higher prices in the international market.
  - 4.3.14. Provide assistance for branding of Sri Lankan products.
  - 4.3.15. Promote the construction of fishing vessels, recreational vessels and other vessels for export.
  - 4.3.16. Work for trade agreements that will improve the access to all export products including fisheries and aquaculture products in identified or prioritized international markets.

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### **Generation of Employment Opportunities**

The Government will:

- 4.5.1. Work for generation of more employment opportunities in the sector where possible.
- 4.5.2. Assist women in the fisher communities to set up micro-business enterprises with special attention to widows.
- 4.5.3. Provide training and capacity building programs to assist women and marginalized groups to take up supplementary income generation activities.
- 4.5.6. Train school leavers in advanced technology related to fisheries, aquaculture and new marine industries targeting employment.
- 4.5.8. Continue to implement the poverty alleviation programmes that provides sustainable livelihoods.

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### **Environment, Climate and Natural Disasters**

The Government will:

- 4.5.9. Develop a strategy to address the environmental and climatic-change challenges, and impacts of natural disasters.
- 4.5.10. Take possible precautions to prevent marine pollution given its direct adverse impacts on fish and other living marine aquatic resources.
- 4.5.11. Provide assistance to the communities affected by disasters to resettle and recommence livelihoods.
- 4.5.12. Formulate an inter-institutional network system of responsible authorities to address impacts of natural disasters.
- 4.5.13. Develop peoples' resilience capacity to cope with climatic change impacts.
- 4.5.14. Improve the research work and institutional involvement to fill the information gaps and develop a database on climate change related issues.

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### **Gender**

The Government will:

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4.5.15. Promote equal opportunities for women's participation in the activities of the sector.

4.5.16. Make gender mainstreaming an integral part of small-scale fisheries development strategies.

4.5.17. Create conditions for both men and women to have equal access to resources and benefits.

4.5.18. Encourage both men and women to participate jointly in finding solutions to their problems.

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### **Improvement of the Socio-Economic Conditions of the Fisher Communities**

The Government will:

4.5.21. Improve the social safety net and social security protection for the fishers and fish workers including women.

4.5.22. Respect the tenure rights of the traditional, migrant, subsistence and artisanal fishing communities to land, waters, and fish resources.

4.5.23. Make right holders responsible for sustainable use of the resources.

4.5.24. Ensure safe, healthy, and fair working conditions at sea, inland waters and on land.

4.5.25. Involve fishing communities in designing, planning and implementation of fisheries management measures.

4.5.26. Build the capacity of fishers and ensure their effective participation in fisheries management.

4.5.27. Promote investment in human resource development such as health, education, literacy, and digital inclusion in fishing communities.

4.5.28. Progressively realize rights of the small-scale fishers and fishworkers to an adequate standard of living in accordance with the national and international human right standards.

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### **Subsidies**

The Government will:

4.5.29. Use subsidies only as a tool in management of the sector.

4.5.30. Wean away the fishers from the mentality of dependency on subsidies.

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### **Financing Facilities**

The Government will:

4.5.31. Encourage private financial institutions to develop financial instruments to ensure financial inclusion for fishers.

4.5.32. Encourage fisher communities to deal with banks and other formal credit institutions for their financial requirements.

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### **Private Sector Participation**

The Government will:

4.5.33. Promote the private sector participation in the sector.

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4.5.34. Promote the establishment of public – private partnerships (PPPs) for investment in the sector.

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### **Human Rights**

The Government will:

4.5.35. Ensure that no human rights are violated in development and management of fisheries and aquaculture.

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### **Fisher Organizations**

The Government will:

4.5.37. Recognize, empower, and strengthen fisheries cooperatives in addressing issues in fisheries and fisher wellbeing, and in representing fishing communities at decision making platforms.

4.5.38. Liaise with fisheries cooperatives in integrated coastal zone management.

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## **National Nutrition Policy**

*Ministry of Healthcare and Nutrition (Published in the extraordinary gazette No. 1639/5 of 02.02.2010)*

### **5.3 Ensuring effective management of adequate nutrition to vulnerable populations**

Vulnerable populations are worst affected particularly during man-made and natural disasters as well as during illnesses. Hence National Nutrition Policy aims to:

#### **Policy Statement 5.3.1: *Vulnerable Populations***

Ensure targeting of nutritional interventions to underserved areas, plantation community, urban poor and areas identified by the nutrition surveillance system.

#### **Policy Statement 5.3.2: *Emergencies / Conflict***

Ensure access to adequate nutrition for people affected by emergencies (conflict or natural disasters) and ensure emergency preparedness and response plans to adequately address the basic nutrition needs of all people.

### **5.4 Ensuring food and nutrition security for all citizens**

Food and nutrition security is a major factor in achieving nutritional wellbeing at individual and household level. National Nutrition Policy aims to:

#### **Policy Statement 5.4.1: *Food Based Approaches***

Ensure access to adequate, nutritious, safe and quality food at affordable price throughout the year.

#### **Policy Statement 5.4.2: *Dietary Diversification***

Promote consumption of a wide variety of foods ensuring intake of all macro and micronutrients to prevent deficiency disorders and diet related chronic diseases.

#### **Policy Statement 5.4.3: *Nutrient Enhancement***

Promote and facilitate improvement of quality of commonly consumed food items (e.g., food fortification) to ensure micronutrient supplementation for vulnerable groups.

#### **Policy Statement 5.4.4: *Food Safety***

Enact and implement of appropriate legislations and other regulatory mechanisms to ensure provision of safe nutrition to all citizens of Sri Lanka.

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**Food Act No.26 of 1980**

Part 1: Prohibitions in respect of food

Prohibition on manufacture, importation, sale, and distribution of food [Articles 2(1), (2), (3)]

Labeling and packaging, advertising [Articles 3 (1), (2)]

Where standard is prescribed [Article 4]

Sale for purposes other than human consumption of food rendered unfit for human consumption [Article 5]

Warranty [Articles 6 (1), (2), (3)]

Licensing [Articles 7 (1), (2)]

Regulations [Article 32]

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**Extraordinary Gazette No. 1660/30  
of 29.06.2010****Food (Packaging materials and Articles) Regulations 2010, under section 32 of Food Act No.26 of 1980**

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**Extraordinary Gazette No. 1646/19  
of 24.03.2010****Food (Formaldehyde in fish) Regulations 2010, under section 32 of Food Act No.26 of 1980**

No person shall import, transport, distribute, store, sell, offer, or expose for sale any fish in Sri Lanka, which contains Formaldehyde in levels exceeding 5 mg/kg (ppm.)

Every person importing fish into the country shall produce at the point of entry of such fish into the country, a certificate of conformity from the relevant National Authority of the country of origin or exporting country as the case may be, which states that the fish imported, conform to the levels specified in these Regulations.

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**Extraordinary Gazette No. 1589/34  
of 20.02.2009****Food (Adoption of Standards) Regulations 2008, under section 32 of Food Act No.26 of 1980**

The SLS number allocated to a food item by the Sri Lanka Standards Institution established under the Sri Lanka Standards Institution Act, No. 6 of 1984 was deemed to be the standards applicable for the assessment of the quality of food those items under the Food Act, No. 26 of 1980, in the absence of any standards being specified for such item under the said Act.

Fish Dried: SLS 643

Maldiv Fish: SLS 811

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**Food (Fish and Fish products) Regulations 2003, under section 32 of Food Act No.26 of 1980****PART III: Dried fish**

1. Dried fish shall be fresh or boiled wholesome fish which has been salted and sun dried or mechanically dried. The fish shall be gutted and cleaned where necessary. Dried fish of size less than 70 mm may not necessarily be salted.

(i) Dried fish shall:

- (a) be free from any odour indicating excessive spoilage and rancidity;
- (b) have no additives other than salt (sodium chloride);
- (c) be free from pink or black discolouration of the surface;
- (d) be free from fungal, insect or mite infestation.

(ii) Dried fish of length less than 70 mm shall not contain-,

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- (a) more than 20.0 % m/m moisture,
  - (b) more than 7.0 % m/m acid insoluble ash, on dry basis
  - (c) more than 16.0 % m/m and not less than 2.0 % m/m sodium chloride, on dry basis
  - (d) more than 100,000 per gram total colony count, and
  - (e) more than 10 coliform per gram.
- (iii) Dried fish of length more than 70.0 mm and less than 150.0 mm shall not contain –
- (a) more than 30.0 % m/m moisture,
  - (b) more than 5.0 % m/m acid insoluble ash, on dry basis,
  - (c) more than 35.0 % m/m and less than 10 % m/m sodium chloride on dry basis,
  - (d) more than 50,000 per gram total colony count, and
  - (e) more than 10 coliform per gram.
- (iv) Dried fish of length more than 150.0 mm shall not contain-
- (a) more than 40.0 % m/m moisture,
  - (b) more than 1.0 % m/m acid insoluble ash on dry basis,
  - (c) more than 35.0 % m/m and less than 12.0 % m/m sodium chloride on dry basis,
  - (d) more than 10,000 per gram total colony count, and
  - (e) more than 10 coliform per gram.

#### **PART IV: Maldive fish**

1. Maldive fish shall be the hard dried product obtained by salting, drying and smoking the flesh of fresh or frozen wholesome fish of the tuna species *Katsuwonus pelamis* L., *Thunnus albacares* (Bonnetterre), *Euthynnus affinis* (Cantor), *Auxis thazard* (Lacepede).

(i) Maldive fish shall not contain -

- (a) more than 16.0 % m/m moisture,
- (b) more than 5.0 % m/m and less than 1.5 % m/m sodium chloride on dry basis,
- (c) more than 200 mg per kg histamine, and
- (d) any additives other than sodium chloride.

(ii) Maldive fish shall be -

- (a) free from any putrid, rancid or mouldy odour;
- (b) free from scales, bones, visible mould growth and insect or mite infestation.

#### **PART V: Smoked fish**

1. Smoked fish shall be the product prepared from cured, pickled, or salted fish and subjected to the action of smoke derived from wood that is free from paint or timber preservative.

(i) Smoked fish shall not contain -

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(a) more than 50 mg per kg of formaldehyde incidentally absorbed in the process

of smoking, and

(b) more than 200 mg per kg of histamine.

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**Sri Lanka Standards Institution Act No.6 of 1984**

**Part I: Objects and powers of the Sri Lanka Standards Institution**

Section 3

**Part II: Certification marks**

Section 17: subsection 1

Section 19: subsections 1,2,3

Section 20

Section 23

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**The Consumer Affairs Authority (CAA) Act No.09 of 2003**

**Part I: Establishment of the Consumer Affairs Authority**

Section 7: Objectives

Section 8: Functions of the authority; subsections d,e,f,j

**Part II: Regulations of Trade**

Section 9: Authority may undertake studies on the distribution of goods and services.

Section 10: Authority to issue directions to manufacturers or traders in respect of price marking, labelling and packeting of goods

Section 11: Selling or offering to sell above the marked price.

Section 12: Determining standards and specifications relating to goods and supply of services.

Section 13: Authority to inquire into complaints

Section 14: Agreement to provide for maximum price &c. of goods.

Section 18: Increase of retail or wholesale price of certain goods and certain services.

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**Extraordinary Gazette No. 1487/9 of 05.03.2007: Order No.08**

Dried sprats were prescribed as a “specified good” under the section 18(l) of the Consumer Affairs Authority Act No.09 of 2003

**The Consumer Affairs Authority (CAA) Act No.09 of 2003, Order under section 18(l)**

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**United Nations Convention on the Elimination of all forms of Discrimination against Women (CEDAW): 2017**

***(Concluding observations on the 8<sup>th</sup> periodic report of Sri Lanka by the Committee on the Elimination of Discrimination against Women)***

Articles 32 and 33 under the section **Employment**

32. The Committee draws attention to the historically low participation of women in the labour market and the high unemployment rate among women. It is concerned at the wide gender wage gap, the limited implementation and monitoring of the principle of equal pay for work of equal value and the concentration of women in the informal employment sector. The committee is also concerned at the lack of disaggregated data on sexual harassment in the workplace and on measures taken to facilitate re-entry into employment by former women combatants, taking into account their specific skills.

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33. The committee recommends that the state party:

- a) Adopt measures to facilitate women's entry into traditionally male-dominant fields of employment;
- b) Impalement laws and policies to protect and promote the rights of women working in informal sectors as well as free trade zones;
- c) Reduce the gender wage gap by applying regular pay surveys and establishing effective monitoring and regulatory mechanisms for employment and recruitment practices;
- d) Collect disaggregated data on sexual harassment in both the public and private sectors, including on the sanctions imposed on perpetrators;
- e) Provide assistance to former female combatants to access appropriate employment and vocational training opportunities free from stereotypes; and,
- f) Ratify ILO Convention No. 189 (2011) concerning decent work for domestic workers

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**Equal Remuneration Convention,  
1951  
(ILO Convention No.100)**

Has aimed at equal remuneration (right to equal pay) for work of equal value without any discrimination on grounds of gender.

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**Discrimination (Employment and  
Occupation) Convention 1958  
(ILO Convention No.111)**

The convention requires states to enable legislation which prohibits all discrimination and exclusion on any basis including race or colour, sex, religion, political opinion, national or social origin in employment and repeal legislation that is not based on equal opportunities.

As a member for which this Convention is in force, Sri Lanka has consented to declare and pursue a national policy designed to promote, by methods appropriate to national conditions and practice, equality of opportunity and treatment in respect of employment and occupation, with a view to eliminating any discrimination in respect thereof.

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**Employment Policy Convention,  
1964  
(ILO Convention No.122)**

The convention emphasizes the declaration and pursuing an active policy designed to promote full, productive, and freely chosen employment, with a view to stimulate economic growth and development, raising levels of living, meeting manpower requirements and overcoming unemployment and underemployment.

According to the Article 1 of the convention, the said policy shall aim at ensuring that: (a) there is work for all who are available for and seeking work; (b) such work is as productive as possible; and (c) there is freedom of choice of employment and the fullest possible opportunity for each worker to qualify for, and to use his skills and endowments in, a job for which he is well suited, irrespective of race, colour, sex, religion, political opinion, national extraction or social origin.

The said policy shall also take due account of the stage and level of economic development and the mutual relationships between employment objectives and other economic and social objectives, and shall be pursued by methods that are appropriate to national conditions and practices.

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**Minimum Age Convention, 1973  
(ILO Convention No.132)**

Each Member for which this Convention is in force undertakes to pursue a national policy designed to ensure the effective abolition of child labour and to raise progressively the minimum age for admission to employment or work to a level consistent with the fullest physical and mental development of young persons.

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As a member state, in accord to this convention, Sri Lanka has declared “14 years” as the minimum age for admission to employment.

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**Workers with Family Responsibilities Convention, 1981**

**(ILO Convention No.156)**

***\*(Sri Lanka has still not ratified this convention)***

With a view for creating effective equality of opportunity and treatment for men and women workers, the convention emphasizes that each member state shall make it an aim of national policy to enable persons with family responsibilities who are engaged or wish to engage in employment to exercise their right to do so without being subject to discrimination and, to the extent possible, without conflict between their employment and family responsibilities.

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**Home Work Convention,1996**

**(ILO Convention No.177)**

***\*(Sri Lanka has still not ratified this convention)***

The Convention provides protection for home workers (who are employed in their own homes), giving them equal rights with regard to workplace health and safety, social security rights, access for training, remuneration, minimum age of employment, maternity protection, and other rights.

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## Policy analysis and gaps identification

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The following analysis was conducted by type of instrument, indicating prescriptions for post-harvest handling of fish, dried fish making, status of women fish processors, work conditions, quality of products & consumer safety and nutrition.

1. Fisheries and Aquatic Resources Policy 2018
2. The Fisheries and Aquatic Resources Act of 1996 and its amendments
3. National Nutrition Policy, *Ministry of Healthcare and Nutrition* (Published in the extraordinary gazette No. 1639/5 of 02.02.2010)
4. Food Act No.26 of 1980
  - 4.1 Extraordinary Gazette No. 1660/30 of 29.06.2010, Food (Packaging materials and Articles) Regulations 2010, under section 32 of Food Act No.26 of 1980
  - 4.2 Extraordinary Gazette No. 1646/19 of 24.03.2010, Food (Formaldehyde in fish) Regulations 2010, under section 32 of Food Act No.26 of 1980.
  - 4.3 Extraordinary Gazette No. 1589/34 of 20.02.2009 Food (Adoption of Standards) Regulations 2008, under section 32 of Food Act No.26 of 1980
  - 4.4 Food (Fish and Fish products) Regulations 2003, under section 32 of Food Act No.26 of 1980
5. Sri Lanka Standards Institution Act No.6 of 1984
6. The Consumer Affairs Authority (CAA) Act No.09 of 2003
  - 6.1 Extraordinary Gazette No. 1487/9 of 05.03.2007: Order No.08. The Consumer Affairs Authority (CAA) Act No.09 of 2003, Order under section 18(I)
7. United Nations Convention on the Elimination of all forms of Discrimination against Women (CEDAW): 2017
8. ILO Conventions
  - 8.1 No. 100 (Equal Remuneration Convention, 1951)
  - 8.2 No. 111 (Discrimination (Employment and Occupation) Convention 1958)
  - 8.3 No. 122 (Employment Policy Convention, 1964)
  - 8.4 No. 132 (Minimum Age Convention, 1973)
  - 8.5 No. 156 (Workers with Family Responsibilities Convention, 1981)
  - 8.6 No. 177 (Home Work Convention,1996)

## Significant policy statements / regulations and gaps identification

Focus	Instrument	Provisions	Gaps
<b>Pre-Harvest Stage in the fish value chain</b>	National Fisheries Policy	<p><b>Infrastructure facilities:</b></p> <p>4.1.30. Develop anchorages and minor fish landing sites and hand over to fisher communities in the respective areas for operation and maintenance.</p> <p>Develop awareness on best fish handling practices</p> <p><b>Fishing Vessels:</b> 4.1.32. Improve quality assurance of fishing vessels.</p>	<p>Serious fish quality issues arise from poor storage methods (fish is only iced, not frozen in multi-day vessels), poor fish handling practices, and inadequate facilities at fish landing centres. Quite often, inferior quality fish are sold for fish processing.</p> <p>The national policy does not place any strong emphasis on the need to develop infrastructure facilities at landing sites. Policy statement 4.1.30 indicates the need to develop anchorage and minor landing sites, although it does not directly deal with the improvement of infrastructure facilities or handling facilities at landing sites. Inadequate storage facilities, the unavailability of clean water, and poor sanitation continue to be serious issues at landing sites.</p> <p>However, the above deficiencies have been eliminated in the proposed SSF policy (section 3.3.1), where provisions have been made for scientific fish handling and storage at landing sites.</p>
	Proposed SSF policy based on SSF Guidelines 2019	3.3.1. Provision of facilities for scientific fish handling and storage at landing sites	
<b>Harvest stage in the fish value chain</b>	--	--	--
<b>Post-Harvest Stage in the Value Chain</b>	National Fisheries Policy 2018	<p><b>Elimination of post-harvest losses:</b></p> <p>4.3.6. Improve quality infrastructure facilities in the production and supply chain.</p> <p><b>Private Sector Participation:</b></p> <p>4.5.33. Promote the private sector participation in the sector.</p>	<p>National Fisheries policy states that quality infrastructure facilities shall be provided in the production and supply chain; this provision can be exploited in developing improved landing site infrastructure and fish processing facilities. The government has a direct responsibility in providing such facilities insofar as landing sites are state-owned. However, supply chain management rests entirely with the private sector, wherein fish processors are</p>



4.5.34. Promote the establishment of public – private partnerships (PPPs) for investment in the sector.

small to medium-sized enterprises. Such enterprises require assistance from the government to make infrastructure improvements.

Provision for private sector participation and PPPs can be an important step towards minimizing post-harvest losses through the introduction of new technologies, improved facilities, and improved fish product quality. It is necessary, however, to ensure that the traditional fish processing industry – which provides an important supplementary income source to fishing families – is not threatened by the entry of private investors aiming to maximize profits.

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**Food Security,  
Food Safety and  
Nutrition**

National Fisheries Policy  
2018

***Food Security, Food Safety and Nutrition:***

4.3.1. Create employment with adequate income levels in the sector to ensure food security of more people.

4.3.2. Ensure quality and food safety of locally marketed fish and fishery products

4.3.3. Promote consumption of sufficient fish for meeting nutritional requirements.

4.3.4. Stock fish as buffer stocks during gluts to ensure the availability of fish at reasonable prices during lean periods.

Fish processing activities generate supplementary income for fishing households, which contributes to “indirect” food security as revenues from the sale of processed products can be used in securing food. The NFP 2018 provides for increased employment in the sector and ensuring food security, but is silent on how the food security of fish processors should be ensured.

The proposed SSF policy states that the government will regulate foreign trade to ensure food and nutritional security of the people. Foreign trade will have an impact on lower-income groups if the fish varieties they consume (small fish varieties) are also exported in various forms (fish fingers, fish cutlets, etc.). In that sense, this policy aims to ensure that the nutritional security of the poorer groups, such as those in the estate and rural sectors, will not be threatened. In respect of fish processors, this means that the livelihoods of those engaged in processing small fish varieties will not come under serious threat.

However, none of these policy instruments guarantee that the food security of the fish processors will not be threatened in the future.

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Proposed SSF policy based  
on SSF Guidelines 2019

4.1 Regulation of foreign trade to ensure that food and nutritional security of the people is not threatened by international trade in fish and fish products

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National Nutrition Policy

*Ministry of Healthcare and Nutrition* (Published in the extraordinary gazette No. 1639/5 of 02.02.2010)

**Policy Statement 5.3.1: Vulnerable Populations**

Ensure targeting of nutritional interventions to under-served areas, plantation community, urban poor and areas identified by the nutrition surveillance system

Ensure access to adequate nutrition for people affected by emergencies (conflict or natural disasters) and ensure emergency preparedness and response plans to adequately address the basic nutrition needs of all people.

The National Nutrition Policy makes provisions for necessary interventions to ensure adequate nutrition to poor segments of the population (rural poor and plantation workers), including those affected by emergencies. Taking into account the importance dried fish in the diet of these populations, such nutritional interventions will have a positive impact on the demand for dried fish in the country, leading to increased incomes and well-being of the people engaged in dried fish production.

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**Policy Statement 5.4.1: Food Based Approaches**

Ensure access to adequate, nutritious, safe, and quality food at affordable price throughout the year.

**Policy Statement 5.4.2: Dietary Diversification**

Promote consumption of a wide variety of foods ensuring intake of all macro and micronutrients to prevent deficiency disorders and diet related chronic diseases.

**Policy Statement 5.4.3: Nutrient Enhancement**

Promote and facilitate improvement of quality of commonly consumed food items (e.g., food fortification) to ensure micronutrient supplementation for vulnerable groups.

**Policy Statement 5.4.4: Food Safety**

Enact and implement of appropriate legislations and other regulatory mechanisms to ensure provision of safe nutrition to all citizens of Sri Lanka

Policy statements 5.4.1-4 indicate the need to ensure safe and nutritious food for all, which has implications for dried fish.

Policy statement 5.4.4 also states the need to introduce appropriate legislation and regulatory mechanisms to ensure the provision of safe and nutritious food.

Since complaints have been raised about unhygienic conditions at certain processing facilities, such policy statements can support the implementation measures regulating hygiene, sanitation, and other food safety aspects to ensure that processed fish products are of good quality and safe for consumption.

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Food Act No.26 of 1980

Part 1: Prohibitions in respect of food

Prohibition on manufacture, importation, sale and distribution of food [Articles 2(1), (2), (3)]

Labeling and packaging, advertising [Articles: 3 (1), (2)]

Where standard is prescribed [Article 4]

Food Act No. 26 of 1980 includes provisions related to food labelling and packaging, actions to combat the use of food unfit for human consumption, food standards, and licensing.

Although the necessary regulations exist, they are not consistently followed by dried fish processors. The transaction costs of enforcement are high, as there are innumerable household fish processors

	<p>Sale for purposes other than human consumption of food rendered unfit for human consumption [Article 5]</p> <p>Warranty [Articles 6 (1), (2), (3)]</p> <p>Licensing [Articles 7 (1), (2)]</p> <p>Regulations [Article 32]</p>	<p>who operate at a relatively small scale in rural areas, and who sell through a large number of segmented markets. This is one area in which appropriate interventions are needed.</p>
<p>Extraordinary Gazette No. 1646/19 of 24.03.2010</p> <p>Food (Formaldehyde in fish) Regulations 2010, under section 32 of Food Act No.26 of 1980</p>	<p>No person shall import, transport, distribute, store, sell, offer or expose for sale any fish in Sri Lanka, which contains Formaldehyde in levels exceeding 5 mg/kg (ppm.)</p>	<p>Use of formalin (formaldehyde solution) in fish is a punishable offense, as it presents serious health impacts including the impairment of renal functions. Formalin has the effect of increasing the storage quality and thus many traders practice it to increase the storage life of fish. Although it is not known precisely to what extent formalin is used to increase the storage life of dried fish in Sri Lanka, anecdotal complaints indicate that some dried fish has a formalin odour. This is an area for further study.</p>
<p>Extraordinary Gazette No. 1589/34 of 20.02.2009</p> <p>Food (Adoption of Standards) Regulations 2008, under section 32 of Food Act No.26 of 1980</p>	<p>The SLS number allocated to a food item by the Sri Lanka Standards Institution</p> <p>Fish, Dried: SLS 643</p> <p>Maldive Fish: SLS 811</p>	<p>SLS standards are well respected in the country and obtaining SLS certification for dried fish and Maldive fish will ensure that such food is safe for consumption.</p>
<p>Food (Fish and Fish products) Regulations 2003, under section 32 of Food Act No.26 of 1980</p>	<p><b>PART III: Dried fish</b></p> <p>1. Dried fish shall be fresh or boiled wholesome fish which has been salted and sun dried or mechanically dried. The fish shall be gutted and cleaned where necessary. Dried fish of size less than 70 mm may not necessarily be salted.</p> <p>According to these regulations, dried fish shall (a) be free from any odour indicating excessive spoilage and rancidity; (b) have no additives other than salt (sodium chloride); (c) be free from pink or black discoloration of the surface; (d) be free from fungal, insect or mite infestation.</p>	<p>The Food Regulations of 2003, under the Food Act No. 26 of 1980, specifically deal with Dried Fish food quality, governing aspects such as odour, rancidity, absence of additives (other than salt), colour, and freedom from fungal contamination and insect infestation.</p> <p>The regulations also provide allowable parameters for moisture, acid insoluble ash, and sodium chloride content, total colony count, coliform, etc. in all sizes of dried fish.</p> <p>While it is evident that a wide range of legal instruments have been put into place to guarantee the</p>

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There are also specifications on the amount of moisture, acid insoluble ash, sodium chloride, total colony count, coliform, etc. on dried fish of length less than 70 mm, more than 70.0 mm and less than 150.0 mm, and for more than 150.0 mm.

#### **PART IV: Maldive fish**

1. Maldive fish shall be the hard dried product obtained by salting, drying and smoking the flesh of fresh or frozen wholesome fish of the tuna species (*Katsuwonus pelamis* L., *Thunnus albacares*, (Bonneterre) , *Euthynnus affinis* (Cantor) , *Auxis thazard* (Lacepede).

(i) Maldive fish shall not contain (a) more than 16.0 % m/m moisture; (b) more than 5.0 % m/m and less than 1.5 % m/m sodium chloride on dry basis; (c) more than 200 mg per kg histamine, and (d) any additives other than sodium chloride.

(ii) Maldive fish shall be

(a) free from any putrid, rancid or mouldy odour; (b) free from scales, bones, visible mould growth and insect or mite infestation.

#### **PART V: Smoked fish**

1. Smoked fish shall be the product prepared from cured, pickled or salted fish and subjected to the action of smoke derived from wood that is free from paint or timber preservative.

(i) Smoked fish shall not contain

(a) more than 50 mg per kg of formaldehyde incidentally absorbed in the process of smoking, and

(b) more than 200 mg per kg of histamine.

supply of safe, quality-controlled dried fish, enforcement of these policies is poor. Inspections of dried fish, maldive fish, and smoked fish at production and marketing sites are effectively absent. Although a quality control unit operates within the Ministry of Fisheries and Aquatic Resources, this unit engages in issuing certificates only for fish destined for export. There is no control of the quality of domestically available fish products.

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The Consumer Affairs Authority (CAA) Act No.09 of 2003

#### **Part II: Regulations of Trade**

Section 9: Authority may undertake studies on the distribution of goods and services.

The Consumer Affairs Authority (CAA) operates at the far end of the fish value chain, governing wholesale and retail trade. The CAA develops labelling and packaging specifications, and occasionally sets standards.

		<p>Section 10: Authority to issue directions to manufacturers or traders in respect of price marking, labelling, and packeting of goods</p> <p>Section 11: Selling or offering to sell above the marked price.</p> <p>Section 12: Determining standards and specifications relating to goods and supply of services.</p> <p>Section 13: Authority to inquire into complaints</p> <p>Section 14: Agreement to provide for maximum price &amp;c. of goods.</p> <p>Section 18: Increase of retail or wholesale price of certain goods and certain services.</p>	<p>The CAA also sets maximum wholesale and retail prices and makes inquiries to address consumer complaints.</p> <p>This authority is quite effective and often conducts surprise inspections of wholesale and retail points of sale to check prices and quality standards.</p>
	<p>Extraordinary Gazette No. 1487/9 of 05.03.2007: Order No.08</p> <p>The Consumer Affairs Authority (CAA) Act No.09 of 2003, Order under section 18(l)</p>	<p>Dried sprats were prescribed as a “specified good” under the section 18(l) of the Consumer Affairs Authority Act No.09 of 2003</p>	<p>Due to the importance of sprats as a high-demand type of dried fish, sprats have been brought under the list of “specified Goods” and sometimes subject to price controls.</p>
<p><b>Marketing, prices &amp; Trade</b></p>	<p>National Fisheries Policy</p>	<p>4.3. Fish should be available in all areas of the country at prices affordable to all income segments.</p>	<p>One of the serious issues facing fish processors is the power of merchant groups. There are no auctions in the sale of dried fish and many processors complain that they do not receive fair prices.</p>
	<p>Proposed SSF Policy based on SSF Guidelines 2019</p>	<p>3.3.2. Intervention in fish marketing and increase competition in fish buying towards ensuring a fair price to fish producers</p> <p>3.3.3 Provision of fishing communities with access to information on fish export market</p> <p>3.3.4 Promotion of the entry of community organisations into fish marketing and establish local and foreign market links</p>	<p>In this respect, there are two important elements in the proposed SSF Policy of 2019. First, the proposed policy states that the government will intervene in fish marketing to increase competition in fish buying. This policy does not specifically indicate, however, that the government will intervene in marketing at different points in the entire value chain. An effective action plan will also need to be worked out, as implementation of market controls has historically been weak. The Fisheries Corporation was established in the early 1980s to intervene</p>

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4.1 Regulation of foreign trade to ensure that food and nutritional security of the people is not threatened by international trade in fish and fish products.

in fish marketing, yet it has never handled more than 3% of the total landings in the country.

Second, the statement on the involvement of fishing communities is also a significant step towards increasing the bargaining power of the producers, including fish processors. Given our knowledge that dry fish forms an important part of the diet of the poorer groups, regulation of foreign trade – as envisaged in the proposed SSF policy – will ensure that less expensive fish varieties will be available locally to meet the nutritional needs of poorer groups in the country. Trade regulation can have a positive impact on dried fish production by ensuring the availability of fresh fish for processing.

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**Employment, Work Conditions and social security**

National Fisheries Policy 2018

**Improvement of the Socio-Economic Conditions of the Fisher Communities**

The Government will:

4.5.21. Improve the social safety net and social security protection for the fishers and fish workers including women.

4.5.24. Ensure safe, healthy, and fair working conditions at sea, inland waters and on land.

4.5.28. Progressively realize rights of the small-scale fishers and fishworkers to an adequate standard of living in accordance with the national and international human right standards.

Both the National Fisheries Policy and the proposed SSF policy state that the government will intervene in providing the fishing communities with the necessary social protections. Social security was previously provided through the fishermen's pension scheme, which was originally very popular but has become ineffective in recent years. Contributions to the scheme are low and fishers complain of inadequate pensions. The proposed SSF policy specifically indicates that government will make efforts to improve the effectiveness of the pension scheme.

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Proposed SSF Policy based on SSF Guidelines 2019

Provision of social protection through effective fisheries pension schemes and fisheries insurance schemes

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Establishment of Fisheries Insurance Schemes jointly with Fisheries Community Organisations to minimize informational asymmetries

Another especially important social security measure is the provision of fisheries insurance to cover various fishing related risks. Fisheries Insurance schemes have failed completely in the past, due to a combination of communications issues and the high transaction costs of investigating claims. Indemnities for insurance claims related to damaged

	Promotion of fisheries insurance schemes that cover fishing and climate related risks causing full and partial damages to fishing crafts and gear, coastal assets, ill health, and loss of life	or lost fishing equipment have been delayed or never paid out.
Discrimination (Employment and Occupation) Convention 1958 <b>(ILO Convention No.111)</b>	<p>The convention requires states to enable legislation which prohibits all discrimination and exclusion on any basis including race or colour, sex, religion, political opinion, national or social origin in employment and repeal legislation that is not based on equal opportunities.</p> <p>As a member for which this Convention is in force, Sri Lanka has consented to declare and pursue a national policy designed to promote, by methods appropriate to national conditions and practice, equality of opportunity and treatment in respect of employment and occupation, with a view to eliminating any discrimination in respect thereof.</p>	<p>One way of addressing communications issues is to operate insurance schemes jointly with fisheries community organisations, such as cooperatives. As community organizations are able to provide reliable information about occurrences at sea, the proposed SSF policy states that fisheries insurance schemes shall operate jointly with fisheries community organisations to minimize informational asymmetries.</p> <p>The proposed SSF policy also states that the government shall promote the establishment of insurance schemes that cover, among other things, full or partial damages to coastal assets (including processing facilities and equipment) and loss of health.</p> <p>The National Fisheries Policy further states that the government will ensure an adequate standard of living for fishing communities, which implies the intervention of the government in providing the fishers with diverse facilities to improve their quality of life. Nonetheless, this policy statement is relatively vague, raising questions as to how the government will achieve the broadly stated goal.</p>
Employment Policy Convention, 1964 <b>(ILO Convention No.122)</b>	Aims that, (a) there is work for all who are available for and seeking work; (b) such work is as productive as possible; and (c) there is freedom of choice of employment and the fullest possible opportunity for each worker to qualify for, and to use his skills and endowments in, a job for which he is well suited, irrespective of race, colour, sex, religion, political opinion, national extraction or social origin.	
Minimum Age Convention, 1973 <b>(ILO Convention No.122)</b>	Ensure the effective abolition of child labour and to raise progressively the minimum age for admission to employment or work. As a member state, in accordance with this convention, Sri Lanka has declared “14 years” as the minimum age for admission to employment.	
Workers with Family Responsibilities Convention, 1981	National policy is to aim at enabling persons with family responsibilities who are engaged or wish to engage in employment to exercise their right to do so	ILO conventions 111 and 122 protect persons against all forms of discrimination and exclusion on any basis, including race or colour, sex, religion,

(ILO Convention No.156) <i>*(Sri Lanka has still not ratified this convention)</i>	without being subject to discrimination and, to the extent possible, without conflict between their employment and family responsibilities.	political opinion, and national or social origin in employment, and invalidate legislation that is not based on equal opportunities.
Home Work Convention,1996 (ILO Convention No.177) <i>*(Sri Lanka has still not ratified this convention)</i>	The Convention provides protection for home workers (who are employed in their own homes), giving them equal rights with regard to workplace health and safety, social security rights, access for training, remuneration, minimum age of employment, maternity protection, and other rights.	In respect of ILO Minimum age convention of 1973, Sri Lanka has declared the minimum wage as 14 years, preventing the use of child labour in employment. This will protect children being used in any fish processing facility.  It is also important to note the ILO conventions 156 and 177, which provide social security and other social development services and protection for home workers and those with family responsibilities. These protections are important for dried fish processors (mostly women) who often conduct their productive activities as family enterprises.  Unfortunately, Sri Lanka has not ratified the two latter conventions, preventing fish processors from claiming the protections that they afford.

<b>Gender</b>	National Fisheries Policy 2018	<p><b>Generation of Employment Opportunities</b></p> <p>The Government will:</p> <p>4.5.2. Assist women in the fisher communities to set up micro-business enterprises with special attention to widows.</p> <p>4.5.2.1 Create conditions for both men and women to have equal access to resources and benefits.</p> <p>4.5.2.2 Encourage both men and women to participate jointly in finding solutions to their problems.</p> <p>4.5.15 Promote equal opportunities for women's participation in the activities of the sector.</p> <p>4.5.16. Make gender mainstreaming an integral part of small-scale fisheries development strategies</p>	<p>The National Fisheries Policy of 2018 includes provisions related to gender equality and gender mainstreaming. The Policy notably aims to create conditions to provide equal opportunities to both men and women to access to resources and benefits. Similarly, CEDAW also emphasizes the need to ensure women's entry into male-dominated fisheries sector. The possibility of implementing this policy with complete success is questionable, however, given the strong cultural grounding of male dominance in the fisheries sector. In this respect, measures aimed at women's empowerment would be of particular value.</p> <p>The national policy also aims to assist women in setting up micro-business enterprises. It is likely that such assistance would take the form of training, subsidized credit, savings groups, or similar initiatives, although the exact nature of such assistance has yet to be determined.</p>
	United Nations Convention on the Elimination of all	Section 33.	



<p>forms of Discrimination against Women (CEDAW): 2017</p> <p><i>(Concluding observations on the 8<sup>th</sup> periodic report of Sri Lanka by the Committee on the Elimination of Discrimination against Women)</i></p>	<ul style="list-style-type: none"> <li>g) Adopt measures to facilitate women's entry into traditionally male-dominant fields of employment;</li> <li>h) Impalement of laws and policies to protect and promote the rights of women working in informal sectors as well as free trade zones;</li> <li>i) Reduce the gender wage gap by applying regular pay surveys and establishing effective monitoring and regulatory mechanisms for employment and recruitment practices;</li> <li>j) Collect disaggregated data on sexual harassment in both the public and private sectors, including on the sanctions imposed on perpetrators</li> </ul>	<p>Gender mainstreaming has also been identified as an integral part of SSF development. However, this would also require making arrangement for obtaining gender-disaggregated data to facilitate effective development decision making.</p> <p>Elimination of wage discrimination between men and women is addressed in CEDAW, ILO Convention 100, and the proposed SSF policy. This is an important policy measure because complaints are often heard about women being paid lower wages than men for similar work – especially in non-fishing activities, such as fish processing.</p> <p>CEDAW also makes provisions to collect disaggregated data on sexual harassment, which could also be of important given that fishing processing (dried fish and maldive fish production) is gradually shifting from a domestic livelihood activity toward one that is conducted within small and medium-sized business ventures that employ hired labour.</p> <p>The proposed SSF policy places emphasis on the need to have 25% women representation in fisheries community organizations, which will ensure a fair participation of women in fisheries decision making processes.</p>
<p>Proposed SSF Policy based on SSF Guidelines 2019</p>	<p>10.1 Building awareness among fishing communities on the right of women to take up employment either directly or indirectly in small scale fisheries</p> <p>10.2 Ensuring a minimum of 25 percent representation of women in the 'committee of office bearers' of fisheries community organisations.</p> <p>10.3 Removal of discrepancies in wages paid to men and women in the fisheries sector</p>	<p>The proposed SSF policy places emphasis on the need to have 25% women representation in fisheries community organizations, which will ensure a fair participation of women in fisheries decision making processes.</p>
<p>Equal Remuneration Convention, 1951 (ILO Convention No.100)</p>	<p>Has aimed at equal remuneration (right to equal pay) for work of equal value without any discrimination on grounds of gender.</p>	<p>Human rights violations may arise in incidents involving parties that enjoy different levels of political power as more powerful parties may, in the pursuit of their own interests, violate the rights of weaker parties. For example, small-scale fishers encounter threats to their access to beaches and coastal wa-</p>
<p><b>Rights</b></p>	<p>National Fisheries Policy 2019</p>	<p>4.5.22. Respect the tenure rights of the traditional, migrant, subsistence and artisanal fishing communities to land, waters, and fish resources.</p> <p>4.5.23. Make right holders responsible for sustainable use of the resources</p> <p>4.5.28 Progressively realize rights of the small-scale fishers and fishworkers to an adequate standard of</p>

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living in accordance with the national and international human right standards

4.5.35. Ensure that no human rights are violated in development and management of fisheries and aquaculture.

4.5.25. Involve fishing communities in designing, planning and implementation of fisheries management measures.

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Proposed SSF Policy based on SSF Guidelines 2019

1.1 Identification, recording and protection of legitimate rights, including, where appropriate, traditional, and customary rights of fishers, to the fish resources, the beach and adjoining lands

1.2 Zonal plans to ensure sustainability of major economic activities including fisheries

2.2.2 Demarcation of boundaries of ecosystems in the Coastal zone critical for fisheries and aquaculture

ters due to the encroachment of coastal tourism interests in Sri Lanka. The National Fisheries Policy and the proposed SSF policy state that the government will recognize the rights of fishers to beaches and fish resources.

Fish processors' beach access rights were extremely important in the past as fish were primarily sun-dried on beaches. Processors have lost traditional fish drying sites, however, due to coastal erosion and encroachment by the hotel industry. Provisions in the current policy statements intended to protect the beach access of fish processors are significant contributions to the protection of customary rights of fishing communities.

Another policy measure proposed in the SSF policy is to demarcate boundaries of the coastal zone, which will also have a positive impact on the customary rights of fishers to beach areas.

National Policy also identifies the right of fishing communities to participate in development and management decision making. This policy is in line with the goal of ensuring inclusive and participatory resource management. However, capacity building in fishing communities will be required so as to ensure full participation in decision making processes. In respect of the dried fish industry, it will be essential that community representation includes fishers, fish processors, and other fisheries stakeholders, including women.

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**Social Development**

National Fisheries Policy

**Improvement of the Socio-Economic Conditions of the Fisher Communities**

The Government will:

4.5.21. Improve the social safety net and social security protection for the fishers and fish workers including women.

4.5.22. Respect the tenure rights of the traditional, migrant, subsistence and artisanal fishing communities to land, waters and fish resources.

The National Fisheries Policy aims to improve social security measures for fishers and fish workers. It further goes on to state that healthy work conditions shall be provided both at sea and on land. The Policy also states that the government will promote investment in human resources development, which will also benefit workers in the fish processing sector.

The proposed SSF policy includes stronger statements on social development measures, asserting

- 4.5.23. Make right holders responsible for sustainable use of the resources.
- 4.5.24. Ensure safe, healthy and fair working conditions at sea, inland waters and on land.
- 4.5.27. Promote investment in human resource development such as health, education, literacy and digital inclusion in fishing communities.
- 4.5.8. Continue to implement the poverty alleviation programmes that provides sustainable livelihoods.

that fishing communities shall be provided with affordable access to basic education, health, housing, and household amenities.

The proposed SSF policy also includes provisions to help children from fishing communities to pursue higher education in fisheries (e.g., to enter the National Institute of Fisheries and Nautical Engineering), and to be recruited into fishery related institutions. Such options are expected to help to minimize child labour by discouraging the entry of children into fish processing facilities or other fishery related work. The provision of credit facilities, as envisaged in the SSF policy, will also help children to continue their education during the off-season.

Social development policy measures lack a clear gender focus, which is a concern in the fish processing sector as employment of women is high.

Proposed SSF Policy based on SSF Guidelines 2019

- 5.1 Ensuring that small scale fishers have affordable access to basic education, health, housing and household amenities
- 5.2 According priority to children of fisher communities to enter higher education in fisheries, and in recruitment for employment in the fishery related institutions.
- 5.3 Provision of financial assistance to needy children from fisher families to continue education during off season
- 5.4 Promotion of the development of credit and micro-credit schemes to encourage investment in fisheries and to enable the poor and vulnerable to access credit.

**Capacity Building**

National Fisheries Policy 2018

- 4.5.3. Provide training and capacity building programs to assist women and marginalized groups to take up supplementary income generation activities.
- 4.5.6. Train school leavers in advanced technology related to fisheries, aquaculture and new marine industries targeting employment.
- 4.5.26 Build the capacity of fishers and ensure their effective participation in fisheries management.
- 4.5.13. Develop peoples' resilience capacity to cope with climatic change impacts.

Several capacity-building measures have been identified in the National Fisheries Policy and the proposed SSF Policy. Special attention has paid to training in fishing communities, targeting women and marginalized groups, to promote alternative income generation activities, including fish processing. Training facilities have been extended to school dropouts, who are relatively numerous in fishing communities.

	Proposed SSF Policy based on SSF Guidelines 2019	<p>9.1 Designing and conducting training courses in fish farming</p> <p>9.2 Building capacities of members of fishing communities in new fishing techniques, deep sea fishing technology, post-harvest processing, alternative livelihoods, and resource conservation and management.</p> <p>9.3 Training of women &amp; school dropouts in fishing communities in post-harvest processing and other ancillary activities related to fisheries</p> <p>9.4 Training of government officials and community leaders on the principles of co-management</p>	The National Policy and the proposed SSF policy also support capacity-building in fishing communities to enhance participation in resource conservation and management. Interventions in this area can be important to fish processors, who are rarely invited to fisheries-related decision-making platforms. Since fish processing is a strong link in the fish value chain, processors have a need to participate in fisheries co-management platforms to ensure their interests are represented.
<b>Community Organisations</b>	National Fisheries Policy	<p>4.5.37. Recognize, empower, and strengthen fisheries cooperatives in addressing issues in fisheries and fisher wellbeing, and in representing fishing communities at decision making platforms.</p> <p>4.5.38. Liaise with fisheries cooperatives in integrated coastal zone management.</p>	Community-based fisheries organisations, especially cooperatives, have played an important role in providing diverse forms of livelihood capital (physical, financial, social, human, and natural) to their members. Both the National Fisheries Policy and the proposed SSF Policy make strong commitments to empowering community-based fisheries organisations. Since it is also envisaged that all public assistance to fisheries will be channelled through community organizations such as fishing cooperatives, it will be important for fish processing workers to become members in those organizations if they are to access benefits, or alternatively to establish processor cooperatives of their own (e.g., dried fish processing cooperatives).
	Proposed SSF Policy based on SSF Guidelines 2019	<p>11.1 Provision of training for officials of fisheries cooperatives in resource conservation and management, financial management and principles of cooperation</p> <p>11.2 Channeling of all public assistance to fishing communities through fisheries cooperatives ensuring the benefits to the end users</p> <p>11.3 Consultation of Fisheries Cooperatives in the design, planning and implementation of fisheries and other development projects</p> <p>11.4 Dissemination of Policy documents, laws, rules and regulations in a manner fisheries communities understand easily</p>	Fish processing sector workers will also benefit from the suggested policy measures aiming to disseminate policy documents, laws, and regulations in local languages, including regulations on dried fish and maldivian fish.