



APPEAL TO THE HONORABLE CHIEF SECRETARY DR. SHALINI RAJNEESH

FOREWORD

Khushi Parisara, deeply involved in the coastal spectrum of moving activities, creating environmental understanding on development divides, catalysing the involvement of various stakeholders, requesting governors to prioritise the needful solutions for the current coastal environmental disastrous issues, **dares to deem that the RULE OF ENVIRONMENTAL LAW IN TOURISM GOVERNANCE should imperatively**

- Provide environmental assessment of the Tourism Policy by an Environmental Expert
- Deliver a robust plan for managing tourism environmental protection and restoration
- Design and implement a roadmap polyphasic framework to guide the tourism industry adopting a **ground nature positive approach** through **proactive steps for nature conservation** – creating targets to protect habitats, species & natural environment, merging nature-based tourism activities

SYNOPSIS

“India's environmental issues are rooted in local practices of resource exploitation” Guhal

Tourism industry, a weighty funder of the economy, treads a thin line between exploitation and preservation, with unconsidered environmental developments putting the environmental heritage of our local complex biosphere in danger. The profits brought by tourism industry are so attractive that environmental impacts are becoming a secondary concern – if at all.

Challenges are unavoidable as we need a big move, a fresh tourism concern in a more environmental proactive ground mode within a transparent and consistent shared responsibility.

1. **Negative impacts from tourism industry** appear when the level of visitors is greater than the environment's ability to cope with it **within the acceptable limits of change**.

Tourism strategy, should clearly emphasise quality over quantity, rather than promoting unconsidered mass tourism, to hold regenerative strategies, with primary commitment to minimise adverse environmental impacts, restoring and enhancing our ecosystems, while fostering economy, society and culture.

Tourism development must not destroy environment —it must integrate it, it must improve it.

The construction of resorts, hotels, and other tourist infrastructures along coastlines is damaging critical habitats like mangroves, seagrass beds, coral reefs, and nesting sites for sea turtles.

At coast, tourist activities are moving from hiking and sightseeing to scuba diving, off-road vehicles, water sports, dolphin and whale spotting, beach treks, boat cruises, etc., on a threat to wildlife (birds, reptiles, mammals) for a biodiversity loss.

We are facing the widely known environmental impacts of expanding tourism, generating various environmental stress and widespread encroachments such as

- Increased pollution (air, water, noise, solid & liquid waste)
- Water quality degradation
- Land degradation through soil erosion and unsustainable land use
- Wildlife disturbance and biodiversity loss
- Natural habitat loss
- Endangered species by the pressure on them
- Depletion of natural resources due to its overconsumption
- Deforestation
- Sand dunes destruction
- Chemical discharges into the sea
- Sewage pollution damages to flora and fauna, along with changes in salinity & siltation

And thus, coastal stress exposes the numerous threats to coastal areas, among which pollution and development (construction of buildings & infrastructures, mainly by tourism industry) are the most persistent and consistent.

Natural resources are finite goods, and without proper management, the anthropogenic activities that generate their depletion end up causing weighty problems. Therefore, since coastal areas are particularly susceptible to harm, **a robust plan for managing tourism environmental protection is a must.**

Tourist hotspots, particularly those in ecological sensitive areas, as the coast, commonly undergo habitat destruction due to infrastructure development (e.g., construction of hotels, resorts, roads, and other tourism facilities) that end up in deforestation, variations in land, depletion of natural resources, high pollution, and disruption to local ecosystems.

Exemplar, disturbance from lighting or noise has deleterious impacts on wildlife in tourist destinations and notably coastal development has major impact **on turtle species**. Roads, car parks and landscaping have replaced natural nesting sites. Turtle offsprings innately head towards the brightest part of the horizon when they hatch at night. Sea turtles, that rely on the moonlight to find their way from the beach to the ocean, are disoriented by the bright lights from beachfront facilities, car headlamp or streetlight, making their survival even more precarious.

The establishment of nightlife industry brings heavy impact to humans and animals and not only to turtles.

2. World-wide, **some sectors of the tourism industry are becoming aware of those impacts**, realising that if they aren't cautious, they will lose the unique wildlife or pristine scenery that tourists come to visit. Thus, if properly steered, managed with care, foresight, and **a genuine commitment to nature**, tourism can also be a tool for positive change, a catalyst for broader environmental awareness and education, offering and promoting an earnest environmental consciousness for visitors tenably grounding the rapid tourism expansion.

Such awareness is not moving Indian tourism industry yet.

To prompt it is at hands of the highest officers of the State.

FINALE

Actually, the awfully poor (or non-existent) enforcement of Environmental Rules (namely the Waste ones) by the governing bodies responsible for it, increases the environmental impacts generally faced by all of us, but more accurately suffered by the rural communities – fully deprived of the basic infrastructures for Wastes management, but fully ravaged by SUPs.

The unavoidable practice of waste burning and dumping, consistently escalating pollution is massively amplified by tourism industry. And, at the coast, these rural communities utilise their surroundings – sea, shorelines, estuaries, mangroves, dunes, creeks – as common dumping places for all kinds of waste.

Karnataka coast will be stuck in a large environmental crisis, with estuaries, sangams, creeks, and seashore clogged by pollution, and its fragile ecosystems facing a broader crisis if the proposed mass tourism will develop as announced.

With unrestricted pollution, vague enforcement of environmental rules, and non-existent mandatory infrastructures to tackle pollution, the State risks, in a near future, to lose its environmental heritage (tourist product of the industry) along the trust of local communities and tourists. If the government doesn't act decisively now, the decayed pristine beaches of Karnataka will soon be sidestepped.

The practical efforts to reduce footprint activities through a Nature Positive approach to halt and reverse biodiversity loss while empowering local communities, must include assessing operational impact, setting out a clear strategy and generating revenue streams to sustain the protection, management and restoration of ecosystems.

ENTICED INTERVENTIONS

- Commitment for an environmental priority
- Enforce strict actions, through **comprehensive frameworks**, for all public and private stakeholders, along **regular surveys** of coastal regions to avoid the ongoing decline of environmental assets by tourism industry
- Create **indicators for assessment** of proposed tourism products
- Establish **regulatory measures** for tourism industry following careful planning for controlled environmental development

Kumta
January 2025

APPENDED

**Memorandum on the Karnataka Tourism Policy 2024-29 and
Script on the Karnataka Tourism Policy 2024-29**



MEMORANDUM

ON THE KARNATAKA TOURISM POLICY 2024-29

BACKDROP

There is truly a need for a more thoughtful approach to the development of tourism industry.

Congruence between theoretical announcements and effective ground work is a must.

Typically, every development plan at coastal area is snubbed from a marketable perspective, and, when environmental features are concerned, it is presented as “sustainably trying to minimize environmental effects”; what leads to truly unsustainable coastal tourism development with its well-known countless negative impacts among which economic depletion – as it destroys the roots for its flourishing.

Is the announced "sustainable tourism" truly sustainable on the ground? Or is it just proclaimed for a suitable tourism industry flashing?

As sustainable practices are a way of using a resource without depleting, or permanently damaging it, while catering it to modern needs, we may understand that the Tourism playbook is flawless – it makes grand sustainability pledges, visioning great ecosystemic undertakings, but with a side of greenwashing. Tourism industry wants a buoyant public image. That's why it's spending weighty resources on Policies, one after the other, not even finishing the previous ones (2020-2025 & 2020-2026).

FACTS

Tourism is Environment dependent, they are inextricably linked.

Actually, without grasping the significance of sustainable practices or the long-term costs of unchecked tourism, without the right guidance, monitoring and control, tourism industry can become an uncontrolled overcrowded force, triggering environmental degradation, as recurrently seen.

One of the most consistent hurdles in developing and implementing **policy tools** in tourism industry is the complex interaction of its countless stakeholders, and its decentralized type, that makes its governance a challenge. In particular, the coordination of the mandates and attributions of government stakeholders from the different bodies.

As most instruments are non-compulsory, they are effective only to a very limited extent.

The way in which economic/development activities are currently being carried out has large negative impacts on biodiversity and natural ecosystems, and tourism industry is a high contributor to it, mainly when carried out without standards designed to protect natural assets. The trouble is heightened by the fact that tourism often occurs in areas of high biodiversity, such as coastal zones, where uncontrolled mass tourism is one of the main drivers behind coastal degradation.

The well-known impacts of tourism development comprise:

- Use of land and resources for varied tourism facilities, including road networks
- Extraction and use of local resources (e.g., beach sand, reef limestone, wood, etc.)
- deforestation, draining of wetlands, overstressed use of land, increasing erosion
- Disruption of wild species, unsettling their normal behaviour, affecting mortality & fertility through changes to their habitats and ecosystems
- Intensive water demand and deterioration of its quality

- Severe sewage pollution through chemical wastes, toxic substances and pollutants
- Huge solid waste production along contamination of land, freshwater and seawater resources
- Noise and Light pollution

SENSIBLE BENEFICIAL ACTION OF TOURISM

Owing to the absence of proper knowledge and understanding of ecosystems features, environmental literacy is lacking. Thenceforth it is indispensable

- to develop consistent strategies to heighten alertness on the value of nature for a conscious behaviour on the activities committed to halt and reverse biodiversity loss, fully and unfailingly fostering environmental conservation and restoration
- to advance long-term public education and awareness-raising campaigns to inform both tourism traders and general public on the impacts of tourism industry upon biological diversity, along multiparty environmental best practices designed for various sectors, namely consumers, developers and tourism operators
- to instill a sense of pride and responsibility towards preserving the local natural resources.

PRODDINGS

1. Recognizing biodiversity as a crucial factor for its competitiveness, tourism industry should be planned and managed **within the limits of acceptable change**. Then, in vulnerable ecosystems, it should be restricted and where/when necessary prevented.
2. The decision-making process should be transparent, accountable, and apply the precautionary approach.
3. Developers and operators of tourism industry should be required to report periodically to designated authorities and to the public on compliance with conditions set out in approvals of facilities & activities for which they are responsible.
4. Prior to the onset of any tourism development or activity, an inclusive environmental monitoring and reporting system should be put in place, with precise indicators to track how it will lower threats to biodiversity, along with measurable standards of levels of acceptable change.
5. The proposals for eco-sensitive locations are to be submitted through notification process, inclusive of the infra detailed information
 - flora, fauna and ecosystems that could be affected by the tourism development & activities, including crucial, rare, endangered or endemic species
 - ecological aspects of the site and its surroundings, including indication of any protected areas; indexation of the ecosystems, habitats, and species; quantitative and qualitative information on the loss of habitats and species (main reasons, trends)
 - Proposed management actions to avoid or minimize adverse impacts from the tourism development/activities
6. The Government has **to evaluate the adequacy of the mandatory impact assessments submitted by backers of tourism developments**, by an aptly qualified team in biodiversity, also involving local communities affected by them, with public access to the documentation.

SCRIPT ON THE KARNATAKA TOURISM POLICY 2024-29

OFFICIAL PRESENTATION	KHUSHI PARISARA QUERIES
The Honourable Chief Minister states that “our vision for tourism is deeply connected to our goal of becoming a Trillion Dollar Economy.”	but without accurate vision on environment
The Honourable Deputy Chief Minister considers <ul style="list-style-type: none"> • the Policy is “a visionary document” • Karnataka has always been a land of unparalleled diversity 	but without accurate vision on environment before mass tourism development
The Honourable Minister for Tourism declares that “we remain committed to sustainable tourism practices that ensure the preservation of our natural and cultural assets”, “nature in all its glory has been at the centre of the human being’s wanderlust.” also mentioning the “pristine beaches of the coast”	sound, light, night market, live music venues, etc is nature in all its glory? Pristine beach is a beach not developed or changed in any way, left in its original condition. Syn: unspoiled, unpolluted, untouched Which are the pristine beaches at our coast?

CONCERNING COASTAL CONTENTS

Karnataka is a premier coastal tourism destination by developing world-class sustainable tourism infrastructure, ensuring the preservation of coastal ecosystems	How the preservation of coastal ecosystems will be ensured?
adopting eco-friendly initiatives that minimize environmental impact while fostering community-based tourism.	which eco-friendly initiatives?
tourism practices that protect Karnataka’s natural resources	which practices? which resources?
KTIL shall be the nodal agency for the development of tourism infrastructure in KT	which will be the nodal agency for Env protection?
Destinations shall also be encouraged to develop facilities and activities such as night market, (...), sound & light show, (...) live music venues	

DISTRICT AND REGIONAL TOURISM MASTER PLANS	
The Dept of Tourism will coordinate with UDD, RDPR, FEE, Directorate of Town & Country Planning and other relevant govt agencies & stakeholders to review & amend master plans. The revisions will ensure that tourism-driven development is a priority, with particular emphasis on creating a sustainable tourism ecosystem in coastal areas and eco-sensitive zones.	through which strategies, with which guidance, ...???
CONNECTIVITY IN ECO-SENSITIVE ZONES AND COASTAL AREAS	
Such interventions will aim to enhance tourist accessibility without compromising the environmental integrity of these areas	in which way the environmental integrity will not be compromised?
The Government of Karnataka shall endeavour to support and promote all types of tourism activities in Karnataka.	thanatourism (dark tourism) on the environmental degradation also?
A dedicated Coastal Tourism Development Board (...) empowered to undertake special initiatives for coastal development (...) shall prepare a comprehensive Coastal Master Plan to drive planned & sustainable tourism development	
Planning for Tourism Development Dept of Tourism will coordinate with the Directorate of Town & Country Planning & other relevant government agencies & stakeholders to review & amend local town & country planning regulations & master plans to facilitate tourism development in coastal areas.	means???
Dept of Tourism shall work with other government agencies to pool land banks for tourism projects and undertake allocation through transparent mechanisms.	means????
Transferrable Development Rights for Coastal Tourism	
Karnataka Tourism will work the concerned government agencies & stakeholders to implement a Transferrable Development Rights (TDR) mechanism for tourism projects in coastal Karnataka, enabling their transfer to designated high-priority tourism zones and integrated coastal tourism zones	Not clear/exact enough for our understanding
Investment Facilitation	
A dedicated institutional mechanism shall be set up to facilitate investments and provide handholding support to tourism projects in coastal Karnataka. This includes facilitation for CRZ Clearance and other statutory approvals. Priority shall be accorded to proposals arising from within the coastal communities.	facilitation for CRZ Clearance of encroaching facilities? Which type of statutory approvals?

To provide guidance & monitor progress, a Tourism Skill Development Committee shall be constituted with representatives from the industry, academia, and reputed skill development agencies	except on/from environment
Tourism has an important role in achieving the 17 SDGs set by the UN, especially in relation to SDGs 8, 10, 12 and 17 , (p. 66)	NOT SDG14?
10.2 ENVIRONMENTALLY SUSTAINABLE PRACTICES	
Tourism carrying capacity studies (TCCS) shall be carried out at tourism destinations especially in eco-sensitive destinations & Protected Areas to develop standards & norms for environmentally sustainable practices . Based on the (TCCS), mechanisms shall be evolved for implementation & monitoring of sustainable practices in these destinations.	too vague and inefficient without timeline for the endeavours
Karnataka Tourism shall encourage & promote tourism experiences with a low impact on the environment & resources to operate in accordance with 'Leave No Trace' principles.	means that night markets, sound & light shows, live music venues have low impact?
15.1.4. Tourism Task Forces Karnataka Tourism Promotion Advisory Group Coastal Tourism Development Board Tourism Skill Development Committee	no Environmental Board for the coast?
The Department of Tourism has prepared a comprehensive Tourism Plan for Coastal Karnataka that has been incorporated in the Karnataka Coastal Zone Management Plan (CZMP) under Coastal Regulation Zone (CRZ) 2019 notification.	Where is it accessible to the public?

Résumé: the official presentation of the Policy promotes Tourism, an industry growth model as an ecosystem, that on the ground ignores ecological constraints; being problematic to cognize how the announced Environmental stewardship – as a key principle for community participation under the Policy (p.64) – is designed to be achieved.