

To

Mr. Anjum Parvez, IAS

Additional Chief Secretary

Forest, Ecology & Environment Department

Government of Karnataka

Vidhana Soudha, Bengaluru

**Subject: Submission of Petition Seeking Urgent
Strengthening of Coastal & Environmental Governance in
Karnataka**

Respected Sir,

We hereby submit the enclosed petition for your kind consideration regarding the **rapidly deteriorating environmental condition of Karnataka's coastal belt** and the systemic governance gaps contributing to this decline. Over several years, *Khushi Parisara* has documented widespread violations of environmental and CRZ regulations, unchecked growth of unlicensed coastal activities, and persistent non-enforcement of Waste Management Rules—issues repeatedly highlighted in our representations to multiple authorities.

Despite the availability of advanced satellite technology, established institutional frameworks, and clear statutory mandates, enforcement of environmental laws remains critically weak. This has resulted in severe degradation of beaches, estuaries, mangroves, dunes, marshes, and fish-landing zones, disproportionately harming rural communities and accelerating ecological instability along the coastline.

The enclosed petition emphasises:

1. **The urgent need for a dedicated State-level Environmental Enforcement Institution** to address widespread governance failures.
2. **Creation of specialised coastal/marine ecological cadres** to guide all coastal governing bodies with scientific expertise.
3. **A coordinated interdepartmental action framework** to restore, protect, and monitor the coastline using existing technologies such as KRSAC satellite systems.
4. **Strengthening accountability mechanisms** to ensure the responsible performance of officers and enforcement of environmental rules.
5. **Local and State-level structural reforms**, including ward-wise surveys, time-bound remedial action plans, strict CRZ compliance, ecological implementation of the

K-SHORE Project, and responsible execution of the
Karnataka Tourism Policy 2024-29.

This petition seeks your leadership in initiating strategic institutional reforms to reverse the coastal ecological crisis and ensure effective, lawful, and science-driven governance.

We kindly request that the issues and proposals presented be examined with urgency, and necessary directions be issued to relevant departments to begin corrective action at the earliest. We remain available to provide clarifications, field evidence, or presentations that may assist informed decision-making.

Thank you, Sir, for your time and consideration.

Yours
faithfully,

Khushi Parisara

Attachment: Copy of Petition



PETITION to
Additional Chief Secretary of Forest, Environment & Ecology
Additional Chief Secretary of Rural Development and Panchayat Raj Department

Mr. ANJUM PARVEZ

OVERTURE

India's environmental challenges are grounded on the critical resource's exploitation promoted by the developmental growth model which ignores ecological limitations and amplifies the environmental jeopardises with the destruction of ecological legacy serving corporates profit. Being increasingly aware of the systematic dilution of India's environmental laws by the prevalent priority of setting commercial interest over environmental protection, *Khushi Parisara* comprehends that the ecological issues we took to the governing bodies are mostly irrelevant and tertiary. Notwithstanding, we ventured to insist on the vast issues of the sensitive coastal milieus, and, to get the coordination of the responsible governing bodies to reverse the situation, we submitted several addresses to the authorities, mostly unreturned. (<https://www.khushiparisara.in/brief-on-last-2-years-of-kp-venture-with-governing-bodies/>) Passed all these years, we start not knowing if the issues taken to governors' attention and action are irrelevant, inappropriate or unworkable, or...
 ... if environment is not on their (current) priorities.

Driven by the assumption that it may be, however, under your matter of concern, we dare to address to you this petition to strategically reverse the coastal situation.

GROUND STATUS

Though a healthy environment became a Human Right (2022), secured and ensured for everyone by all the empowered bodies to enact it, 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. It creates a sanitary exclusion and stable inequity responsible for grave health issues generated by the unavoidable practice of waste burning and dumping, contributing, consistently, for the escalating local and widespread pollution. And so, at the coast, these rural communities utilise their surroundings – sea, shorelines, estuaries, mangroves, dunes, creeks, salt marshes – as common dumping places for all kinds of waste.

This entreaty aspires to shortly acknowledge a change in such quandary, chiefly demanding to set up a dedicated institution for Environmental strict action in the State, urgently reversing the institutional ineptitude, entailed by the Government officials' lack of knowledge about Environmental Rules, their implementation, enforcement, and planning.

BRIEF ON COASTAL FRAMEWORK

1. After all these years of groundwork observing the noticeable sanction by Public Servants of the violation of all the Environmental Rules, daily displayed at the coastal, riverine and forest areas, *Khushi Parisara* ventures to consider that the coastal disasters are rampant moreover

due to the inaction towards the mushroomed development of unlicensed activities and industries fiercely threatening ecosystems. Not only they must be stopped, as they must be reversed in systemic manner – through dedicated Central & State Government Bodies.

a) The Central Government operationalized several organizations with explicit duties for the effective management of coastal resources and implementation of CRZ rules – **NCCR, NCSCM, NCZMA**.¹

b) At the State Government, several bodies are endowed with the management of coastal resources², but is the **KSCZMA** that must issue CRZ clearances & recommendations to NCZMA for the projects under its purview, deal with CRZ environmental issues (viz., identifying ecologically sensitive areas & formulating specific management plans), ensuring the compliance of all specific conditions of the approved KSCZMP.

On the whole, as stated, each one is able, by and large, to use satellite data in ecological development planning, monitoring and performing within CRZs, for environmental conservation. Within this grand operational frame, it's challenging to understand the massive violations damaging our coast as disclosed at many places.

However, the Performance Audit report of the **Comptroller and Auditor General of India** on the Conservation of Coastal Ecosystems is an outstanding tool for a deep and wide cognizance of the current issues, if attention is given to its assessment and proposals.

https://www.khushiparisara.in/wp-content/uploads/2025/11/Report-No.-4-of-2022_CCE_English.pdf

2. Based also on the high-resolution spatial analysis, coastal infrastructures got an enormous escalation the last decades, along with increased sediment barriers and upstream activities, increasing large erosion through the boosted shoreline growing activities – with strong negative impact on homes, scrub lands, estuaries & backwaters, mangroves, mudflats and fish landing milieus.

KSCZMA, the authority liable to take coercive steps for compliance of the environmental rules affecting the coast, did not prevent the mushrooming of unlicensed structures in the CRZ area, nor recovered environmental compensation (based on the Polluter Pays Principle) from the violations damaging the ecosystems —mangroves, sand dunes, mud flats, salt marshes, cliffs, etc. The extant environmental threats and disasters could have been prevented if the liable GOs and their Officers had rightfully performed their duties and if the specified NGOs objections, complaints, requests & proposals would have been considered, accepted and triggered.

Will it be the time for it now?

¹ The **NCCR** must provide to coastal states & stakeholders, technological & scientific services/support for sustainable management of coastal areas. The **NCSCM** must identify sources of environmental impacts –viz. the coastal industrial expansion, port development, inland & sea-based waste disposal, aquaculture, coastal & marine pollution hotspots, impact of urbanization, plastic pollution, waste dumping in storm water drain, encroachments, etc.). And, to gear coastal protection, conservation, rehabilitation, and management, censed to undertake systematic monitoring of environmental, social & impacts of development. The **NCZMA** must implement of the CRZ rules, not only clearing projects within the CRZ areas, as monitoring and enforcing the compliance with CRZ norms, properly tackling violations.

² Departments Managing Marine Resources: National Coastal Mission (NCM), Karnataka Department of Forest, Ecology and Environment (KSPCB, SEIAA, KSCZMA, KBB, EMPRI), Karnataka Fisheries Development Corporation (KFDC), Department of Fisheries, Port authority, Coast Guard, Tourism Department, Local Bodies (ULBs & GPs).

PRAYER

1. FOUNDATIONAL CONTRIVANCE FOR KEY CHANGES

We demand to oversee and ensure correct & strict environmental governance as a paramount responsibility of all the current liable Government bodies, but specially

- The creation of an outstanding Ecological Body of extremely qualified personnel on Coastal & Marine field as proposed to Chief Minister and Chief Secretary <https://www.khushiparisara.in/plea-to-chief-minister-and-chief-secretary/>
- The enduring guidance & backing of marine experts (marine biologists, Environmental Officers/Engineers), extremely experienced, knowledgeable, skilled, deeply ground connoisseurs of the coastal issues, to trigger the needful emergency and operational changes, crafting remedial actions to reverse the current disasters
- To urge clear, consistent and coordinated actions, endorsed by the liable departments, to protect, remediate and reverse the disasters at the coastal environment
- To assert the liability of Public Servants answerable for the coastal ECOCIDE, compelling all to restore the violated condition and pay fair compensation for the damages produced by their wrong doings and inaction.

2. STRUCTURAL CONTRIVANCE FOR KEY CHANGES

To accurately reverse the environmental disaster, we demand to consider the following clear-cut Local and State routes for CONTRIVANCE OF KEY CHANGES:

A - LOCAL

1. To direct a ward-wise survey (mandatorily attended by the respective ward member)
 - a) to assess the waste settings and scrupulously ascertaining chronic waste hotspots (inclusive of storm water drains & natural storm water streams, nallas, banks of lakes, ponds, with yearly submission of action plans and their execution before monsoon).
 - b) to establish proper waste management at all coastal Districts, especially for dry waste (following Udupi model with waste sorting centres and cluster based MRFs involving NRLM)
 - c) to strictly identify the CRZ violations and settled CRZ encroachments
2. To direct the outline of a comprehensive, systemic, time-framed Remedial Action Plan, for and with the civil stakeholders, reflecting the assessment of the survey
3. To ensure accurate monitoring of the remediation process, monthly reported.

B – STATE

1. Take zero tolerance towards CRZ ENCROACHMENTS ensured by the Forest, Ecology and Environment Ministry, hold by the KRSAC satellite-based vigilance system, along the technical facility to digitally map the coastal boundaries delivering digital evidence of encroachments
2. Instruct all the departments endowed with the **K-SHORE** execution project, to implement clear and accurate ecological-based solutions for the coastal development, along with recovery of dunes & bioshields, afforestation of lawns & mangroves, coastal waters, coral reef, sea grass, mud flats, lagoons, feasibly reversing human-made damages.
3. Guide a secured environmental implementation of the **Karnataka Tourism Policy 2024-29**, which is strongly promoting a growth model of the most dangerous industry to the coast that ignores ecological limitations (viz. through illegal building, escalation of noise, artificial light, wastes dumping & burning, sewage & chemicals, etc.)
4. Instruct the responsible authorities to integrate satellite imagery into periodical monitoring of CRZs for early detection of encroachments and unlicensed activities, ensuring the specific qualification of local enforcement bodies, effectively trained on satellite imagery data.
5. Make such data full accessible to trigger public awareness and foster involvement of community in coastal management

6. Boost legal frameworks to ensure stringent penalties for the identified encroachments
7. Instruct the supra proposed Environmental Body to monitor the consistency of the undertaken environmental compliances by Tourism deeds and K-Shore Project.
8. Ensure the strict enforcement of Environmental Rules (with a sparking stress on Waste Rules) by the Governing Bodies responsible for it, namely ensuring basic infrastructures for Wastes Management at rural areas to relapse their mounting pollution.

1 December 2025

Ana S.

President

<https://www.khushiparisara.in/>

Meek note - rephrasing the Deputy CM announcement on the government need of 2,000 engineers for town planning across departments, establishing a dedicated institution for town planning, we emphasize the urgent need to prioritize our proposed accurate strategy, namely the creation of posts and of a dedicated institution to recover the coastal disaster.



**TO THE ACS, FOREST, ECOLOGY & ENVIRONMENT DEPARTMENT,
Mr. Anjum Parvez, IAS**

OVERTURE

India's environmental crisis stems from an extractive development model that overlooks ecological limits and intensifies environmental risks. As environmental laws are progressively diluted in favour of commercial interests, **Khushi Parisara** observes that many of the ecological concerns raised before governing bodies remain unaddressed, despite their urgency. The ongoing degradation of our natural heritage—particularly along the coast—continues to benefit corporate interests through (de)regulated exploitation of resources.

Over the past years, we have consistently approached multiple authorities to highlight the escalating vulnerability of sensitive coastal ecosystems. However, most submissions received no response.

(Reference: <https://www.khushiparisara.in/brief-on-last-2-years-of-kp-venture-with-governing-bodies/>)

Given this persistent inaction, we are compelled to question whether our concerns have been deemed irrelevant or unworkable, or whether environmental protection simply no longer figures among the State's priorities. Nonetheless, trusting that coastal ecological security may still fall within your sphere of concern, we submit this petition seeking **strategic intervention** to reverse the severely deteriorating coastal situation.

GROUND REALITIES

Despite the UN's 2022 recognition of a **clean, healthy environment as a human right**, enforcement of environmental laws—especially Waste Management Rules—remains gravely inadequate. Rural communities, deprived of basic waste infrastructure and overwhelmed by single-use plastics, face disproportionate health hazards from widespread dumping and open burning. This contributes heavily to local pollution and contaminates coastal stretches: **beaches, estuaries, mangroves, dunes, creeks, and marshes have effectively become dumping grounds.**

This petition calls for urgent reforms, beginning with the establishment of a **dedicated State-level Environmental Enforcement Institution** staffed with trained environmental professionals. The acknowledged shortage of nearly **2,000 engineers across departments** underscores the need for specialised environmental planning, enforcement, and damage recovery.

COASTAL MANAGEMENT FRAMEWORK: CURRENT GAPS

After years of field observation, it is evident that coastal degradation is fuelled not only by natural processes but significantly by the **unchecked proliferation of unlicensed activities and industries**, enabled by administrative inaction.

Central Institutions with Clear Mandates

- **NCCR, NCSCM, NCZMA** — empowered to manage coastal resources, implement CRZ norms, and utilise satellite data for ecological planning and monitoring.

State-Level Mechanisms

- **KSCZMA** is responsible for issuing CRZ clearances, ensuring compliance with KSCZMP, identifying ecologically sensitive areas, and preparing management plans.

Despite the availability of robust institutional frameworks and technological tools—including satellite-based monitoring—**large-scale, systemic violations persist across Karnataka’s coastline**.

The **CAG’s Performance Audit on the Conservation of Coastal Ecosystems** offers a comprehensive assessment of these failures and provides strong recommendations for corrective action.

(Reference: https://www.khushiparisara.in/wp-content/uploads/2025/11/Report-No.-4-of-2022_CCE_English.pdf)

FINALE

High-resolution spatial analyses confirm that coastal infrastructure has expanded dramatically over recent decades, contributing to severe erosion and destruction of homes, mangroves, mudflats, estuaries, backwaters, and fish-landing areas.

Despite having the authority and mandate, **KSCZMA has not halted the surge of unlicensed CRZ structures**, nor enforced environmental compensation under the Polluter Pays Principle.

Much of the ongoing ecological damage could have been mitigated if responsible officials had exercised due diligence and if credible objections and proposals from NGOs were duly considered.

The question before us now is: **Will this be the moment to enforce meaningful change?**

PLEA: FOUNDATIONAL CHANGES REQUIRED

We request your leadership in ensuring strict, accountable environmental governance across all responsible bodies, with special emphasis on:

1. Creation of a Dedicated Ecological Authority

An expert body comprising highly qualified professionals in coastal and marine ecology, as proposed to the Chief Minister and Chief Secretary.

2. Continuous Guidance of Marine & Environmental Experts

Including marine biologists, environmental engineers, and field specialists capable of designing and implementing remedial actions.

3. Clear, Consistent, and Coordinated Interdepartmental Action

To protect, restore, and reverse ecological degradation across the coastline.

4. Accountability of Public Servants

To ensure responsibility for administrative inaction leading to ecological harm, including restitution and compensation as per legal principles.

STRUCTURAL REFORMS: LOCAL & STATE-LEVEL ACTIONS

A. LOCAL LEVEL

1. **Ward-wise Survey (Mandatory Participation of Ward Members)**
 - a. Comprehensive assessment of waste management conditions and identification of chronic waste hotspots.
 - b. Systematic identification of CRZ violations and encroachments.
2. **Preparation of a Time-bound, Systemic Remedial Action Plan**
Developed in collaboration with civil stakeholders.
3. **Monthly Monitored Implementation**
With clear documentation and progress reporting.

B. STATE LEVEL

1. **Zero Tolerance for CRZ Encroachments**
Enforced through the Forest, Ecology & Environment Department using KSRSAC satellite-based monitoring.
2. **Ecological Implementation of the K-SHORE Project**
Ensuring restoration of dunes, bioshields, mangroves, coral reefs, mudflats, lagoons, and prevention/reversal of anthropogenic damage.
3. **Environmentally Compliant Execution of the Karnataka Tourism Policy 2024–29**
Particularly in high-risk coastal zones prone to illegal construction, noise pollution, waste dumping, and sewage discharge.

4. **Integration of Satellite Imagery into Regular CRZ Monitoring**
Supported by specialised training for local enforcement bodies.
5. **Public Access to Satellite-Based Coastal Data**
To promote community participation in coastal conservation.
6. **Strengthening of Legal and Penal Frameworks**
For swift action against proven encroachments.
7. **Continuous Monitoring by the Proposed Ecological Authority**
To ensure environmental compliance of tourism projects and K-SHORE interventions.
8. **Strict Enforcement of Waste Management Rules Across Rural Areas**
Establishing essential waste infrastructure to curb escalating pollution.