

EIA *Papers*



EP No.05 -17

October 2017

Performance Appraisal of Environmental Clearance in Delhi, 2016

Delhi being one of the most polluted cities in the world, one would have expected the SEIAA and SEAC to keep air pollution as one of the important parameters while appraising projects. Unfortunately, the both SEIAA and SEAC seems oblivious to the dangerous levels of pollution in Delhi and the National Capital Region while appraising projects. Such casual approach will lead to further decline in the environmental quality putting at grave risk the lives of people who are already living under dangerous pollution levels. There is a need for both SEAC and SEIAA to take cognizance of the existing environmental quality and the incremental increase while appraising projects.

Environment Impact Assessment can serve as an effective tool for decision makers to predict the incremental increase in pollution levels as a result of setting up of a new or expansion of an existing project or activity. In case, the pollution levels are at high level, decision makers need to be extra careful while approving new projects given the fact that the area is already at the tipping point. The present paper focuses on the State of Delhi, wherein all the minutes of meetings of SEIAA and the relevant SEAC minutes for the year 2016 were examined.

A total of 38 projects were considered by SEIAA in the year 2016. The entire years' environmental clearance granting procedure was analysed in the light of air pollution perspective, so as to assess how much priority has been given during the discussion of projects at SEIAA-SEAC meetings. It was found that, the discussion on air pollution and its mitigation measures was limited to the water sprinkling during construction phase of any project, parking and traffic management details for building and construction sector without focusing on the potential impacts on air quality, which might arise from the increased vehicular movements;

In terms of meeting frequency also, non compliance was observed. The EIA Notification mandates EAC/SEAC to meet at least once every month¹. The overall analysis of the proceedings before the SEAC and SEIAA clearly reveals a lack of

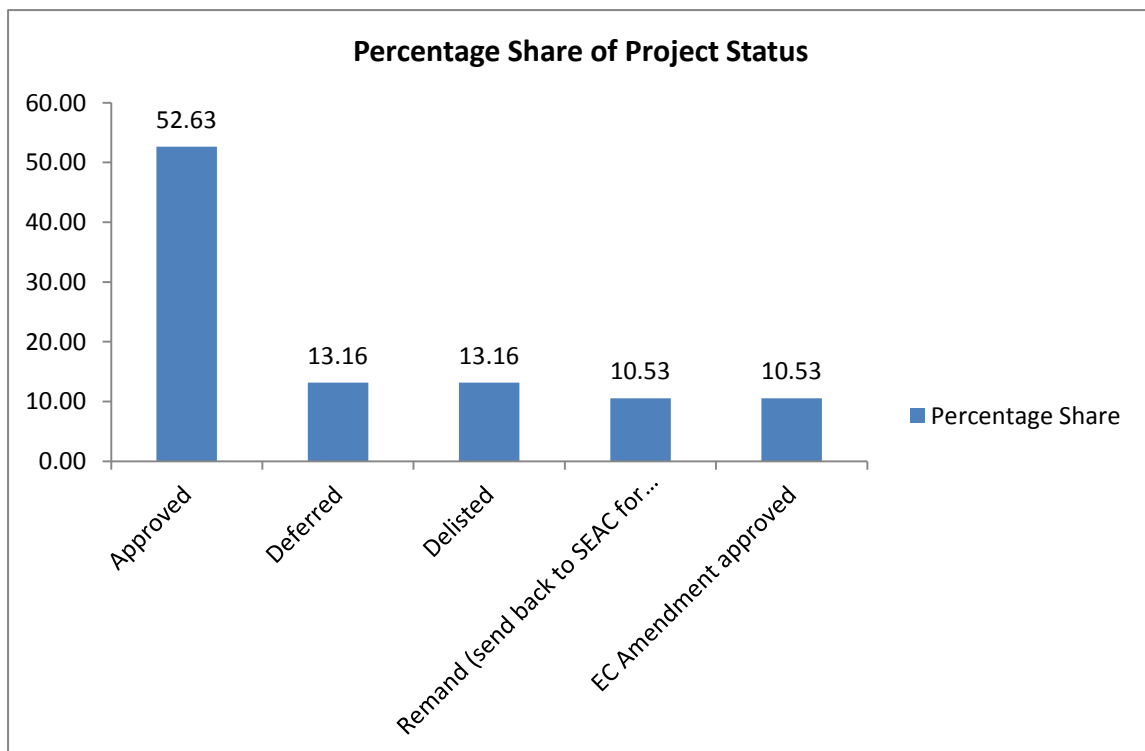
¹ Para 5 of EIA Notification 2006

seriousness on the part of the members of these bodies to undertake the detailed scrutiny which is required under the EIA Notification. The projects were considered in a mechanical manner and approval were granted without consideration of any key environmental issues. There is thus an urgent need to review the functioning of both SEIAA as well as SEAC in order to ensure that they comply with the aims and objective of the EIA Notification, 2006.

Building and construction projects are appraised as Category 8 (a) as well as category 8 (b) under EIA Notification, 2006². The SEAC appraises category 8 (a) project. A total of 38 projects were appraised, all of which are appraised under this category.

Out of these, 20 projects were granted Environmental Clearance by State Environment Impact Assessment Authority (SEIAA). A close look at the clearance granting procedure of building construction sector found that following discussions took place which has direct/indirect consequences on air environment.

- Adoption of dust control measures including spraying of water, peripheral barricading, covered shedding for cement and other raw material handling and loading area, covering of the excavated earth with tarpaulin sheet etc;
- Parking provision along with the traffic management plan for internal traffic movement;



² Building and construction projects having built-up area of more than or equal to 20,000 sqm and less than 1,50,000 sqm is considered as 8(a) projects and townships and area development projects covering an area of greater or equal to 50 ha and or built up area of greater or equal to 1,50,000 sqm is considered as Category 8(b)

Analysis

Details on existing traffic movement as well as the impact of increased vehicular movement from the proposed project on air environment were not detailed out in the minutes. In absence of this information, change in the air quality can hardly be determined; the minutes of meeting have also not detailed out the background air quality level as well as the incremental increase based on the dispersion model taking into consideration the increased traffic level and the impact of DG set operation on the air quality around the project site. This is a gross violation of Appendix II to be read with Para 6 of the EIA Notification³

It is important to note here that, health impact from the traffic congestion can also not be ignored. According to a study, titled "[Air Pollution and Health Risks Due to Vehicular Traffic](#)", "congestion-related" impacts include multiple interactions that occur with congestion. First, congestion lowers the average speed, which increases travel time and exposure on a per vehicle basis. Second, congestion diminishes dispersion of vehicle-related pollutants since vehicle-induced turbulence depends on vehicle speed (Benson, 1989). Thus, lower vehicle speeds can increase pollutant concentrations from roadway sources. Third, congestion can change driving patterns, resulting in an increased number of speedups, slowdowns, stops and starts, which increase emissions compared to "cruise" conditions, especially with high power acceleration. Sjodin et al. (1998) showed up to 4-, 3- and 2-fold increases in CO, HC and NOx emissions, respectively, with congestion (average speed of 13 miles per hour, mph; 1 mph=1.61 km per hour) compared to uncongested conditions (average speed, 38–44 mph).

Conclusion:

All of the projects being undertaken in the region of Delhi were 'construction projects' including new constructions, expansions, redevelopments and renovation for various commercial, residential and hospital premises. In spite of being in regular conversation for air pollution, the SEAC-SEIAA of Delhi had hardly focused attention on air pollution during the time of appraisal of projects and that to of building and construction sector projects which is a major contributor to Delhi's air pollution.

Submission of insufficient data, lack of importance to the cumulative impact assessment, lack of continuity between the previous and subsequent meeting discussion and listing of generalized conditions are some of the gaps that has been taken place during the appraisal procedure.

The EIA Papers are published by Legal Initiative for Forest and Environment (LIFE).

Project Team: Kankana Das, Deskrit Angmo, Sreeja Chakrabarti and Arunita Bose

Project Advisor: Ritwick Dutta

N-71 LGF Greater Kailash, 110048

www.ercindia.org

³ Air Environment of Form 1 A