



Delhi
10 January 2018

To

MoEF&CC
Government of India
New Delhi

Attention : Mr Satendra Kumar

Subject : ERC's Comments on Air Action Plan – Abatement of Air Pollution in the Delhi National Capital Region

Dear Sir

First, let me introduce ourselves. EIA Resource and Response Centre (ERC) is a national level voluntary programme. ERC regularly engages with MoEF&CC and its expert committees providing comments and suggestions on important proposals under consideration for clearances as well as on policy and law issues.

ERC has gone through the action plan in detail in the backdrop of various judgments and orders passed by the Supreme Court and NGT along with the number of Action Plans that have already been prepared with the same purpose. Based on these, ERC is of the opinion that the present action plan is ill prepared to the extent that it is vague and inadequate and the problem of air pollution will still persist in Delhi-NCR, even after the implementation of this ill-prepared action plan. We have analysed the action plan in detail and have prepared following comments on the proposed draft action plan based on our analysis and understanding for consideration of decision makers.

Background: Air quality in the Delhi National Capital Region (NCR) has been a matter of concern, for quite some time now. Remedying this situation requires sustained and coordinated action by a number of agencies. In order to do so, a High Level Task Force has been set up under the Chairmanship of Principal Secretary to PM. The task force has formulated a draft action agenda with an objective of monitoring the same. The agencies responsible for the various determinants of air quality are given with a number of other steps based on their assessment of need.

S.No	Suggested Action	Comments
1.	Crop Stubble Burning, Monitoring and interstate coordination <ul style="list-style-type: none">Coordinated action to combat stubble burning in Punjab, Haryana and U.P	<ul style="list-style-type: none">The Action Plan does not provide any detail with respect to the 'coordinated action' that will be adopted for combating stubble burning and the persons responsible on ground to carry out the coordinated actions.The action plan lists another set of

	<ul style="list-style-type: none"> • In collaboration with Secretary (DARE), Secretary (Agriculture) and Secretary (RD) implement roll out of the agreed plan for managing crop stubble • In collaboration with the Chief Secretaries of Punjab, Haryana and Uttar Pradesh – monitor agreed enforcement measures to reduce crop stubble burning. • In collaboration with Department of Science & Technology - ensure that independent data on crop stubble burning is available in real time. 	<p>authorities to implement ‘roll out’ of the plan for managing crop stubble. These authorities include (i) Department of Agricultural Research and Education, (ii) Secretary (Agriculture) and (iii) Secretary (Rural Development). The action plan however does not detail out the actions to be undertaken by the specified departments to manage crop stubble.</p> <ul style="list-style-type: none"> • The action plan does not talk about any assistance which are supposed to be extended to farmers in the form of supplying of machineries & equipments, financial support, arrangement of field transfer of stubble to the place of utilisation or providing them with education on hazard of stubble burning – this is a complete contradiction of NGT’s direction • National Thermal Power Plant (NTPC) also must be included in the authorities responsible for stubble management given that the NGT in its directions¹ has ordered NTPC to utilize stubble pellets in their plants for power generation. • The Action Plan mandates Chief Secretaries of the states to monitor agreed enforcement measures. The enforcement measures have not been elaborated upon however. • The Department of Science & Technology has been mandated to ensure that independent data on crop stubble burning is available in real time; however at the same time it needs to come out with research & development on alternative usage of crop residue. • The action plan did not talk about promotion of diversified usage of crop residue. • R&D on technology for the best and the cheapest manner of removing stubble, R&D on the best manner for utilization of stubble, Real time air pollution levels in places where stubble burning are traditionally practiced also need to be mandated. • The Authorities made responsible for Crop Burning must also include Pollution Control Board, Deputy Commissioner, District Magistrate and Gram Panchayat, whose engagement is also necessary in order to ensure implementation of various Court orders. • Action plan had missed out on various
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¹ In case titled *Vikrant Kumar Tongad v. Environment Pollution (Prevention and Control) Authority & Ors* (OA No. 118 of 2013)

		provisions mandated through National Policy for Management of Crop Residues, 2014, which was formulated by Ministry of Agriculture Cooperation and Farmers Welfare.
2.	Pollution monitoring and source attribution <ul style="list-style-type: none"> In collaboration with Delhi Pollution Control Committee, ensure that Delhi/ NCR has an adequate network of air quality monitoring stations Commission and validate source attribution studies for the National Capital Region (annually). Set up an anti-Pollution Help-Line in NCR Districts to register complaints of specific violations. A pollution app should also be prepared wherein citizens can take a picture of the violation and upload it for quick remedial action. 	<ul style="list-style-type: none"> 'Adequate' is a very subjective word. Proper research is needed to assess following (i) the population density of an area and (ii) kind of area eg. industrial area or a Critically Polluted Area, as selection of site for monitoring stations should be coincide with this Real time monitoring station should be made mandatory over manual monitoring stations Real time AQI display boards should be made mandatory Action plan did not consider vehicles as a source of pollution – it is of utmost importance to stop plying of diesel vehicle of 10 years old and petrol vehicles of 15 years old on the road, as mandated by NGT DPCC should be responsible only for Delhi and PCBs of the other NCR states should be held responsible. Set up an appointed anti air pollution body that will be accountable for ensuring that the complaints and grievances filed through the anti-Pollution Help-Line are addressed. The Comprehensive Action Plan has also made the Department of Environment (DOE) a responsible agency
3.	Reducing Pollution from Power Plants and other polluting industries <ul style="list-style-type: none"> NOx curtailment measures in all power plants in NCR region in a time bound manner by NTPC and other operators MoEF to develop a Dashboard of all the Red Category polluting units in NCR. Each of these units to install a certified pollution meter within their premises. Strict action should be taken regarding brick kilns operating in NCR especially in areas like Bagpat (UP), Jhajjar (Haryana) without environmental 	<ul style="list-style-type: none"> The curtailment measure has just been limited to NOx, measures also must be mandated to be undertaken to curtail other criteria pollutants including SOx, Particulate Matter and Mercury, besides addressing fugitive emission from fly ash etc. Thermal power plants of Delhi alone contribute to 80% of the SOx emission² and therefore mitigation measures for SOx pollution cannot be avoided No timeline has been specified for the suggested actions, for example running of NTPC Badarpur power plant should not be extended till July 2018³, rather it should be immediately shut down No mandate on fly ash ponds. The action plan needs to ensure proper utilisation of already generated fly ash

² Direction No 8 in the order dated 11th November 2017 in the matter of Vardhaman Kaushik V. Union of India

³ <http://www.hindustantimes.com/delhi-news/polluting-badarpur-power-plant-to-shut-down-by-july-31-next-year/story-x4ZoD6awd8nblgo4ALa5fN.html>

	<p>clearance</p> <ul style="list-style-type: none"> • Enforce all brick-kilns to migrate to Zig- zag technology. 	<ul style="list-style-type: none"> • Action plan failed to give any direction to the thermal power plants to shift from furnace oil to light diesel oil • Action plan did not put any restriction on use of pet coke and furnace oil • No mention of shutting down of stone crusher or any specific action against the illegal hot mix plants running without permission • No action has been proposed, which are to be taken against the violators, be it power plants operators or any other red category industries • Stringently enforce pollution control in TPPs through PCB monitoring • The authorised bodies for ensuring the implementation of the mentioned actions have not been specified. • The authority responsible to carry out the inspection to check for EC is not specified • Need for all brick kiln to stringently enforce all pollution control regulations • No mention of the need to shift towards renewable energy for power generation • The action plan failed to frame out the list of authorities who will be responsible for implementation of various actions and also to take action against the violators - District Magistrate, Superintendent of Police, Pollution Control Board, Delhi Development Authority shall be given with the responsibility
<p>4.</p>	<p>Solid Waste Management</p> <ul style="list-style-type: none"> • MCDs to increase decentralized processing of bio-degradable waste, to fill the gap between waste collected and processed. DDA should provide full support to this exercise. • An independent verification mechanism should be set up to check whether 100% solid waste is actually being collected - with specific focus on poor communities such as slums and JJ clusters. 	<ul style="list-style-type: none"> • Complete prohibition of burning of garbage, biomass and/or any kind of waste anywhere • Apart from MCA and DDA, the Public Health department, Environment Department, PCB and police authority should also be made responsible • Deployment of special forces is call of the hour to ensure immediate and instant action against the person indulging in burning of waste • Implementation of levying a fine on anyone found to burn garbage has again not been mentioned in the action plan
<p>5.</p>	<p>Construction and Demolition (C&D) Waste</p> <ul style="list-style-type: none"> • Large construction Agencies like NBCC and CPWD that are working in the National Capital Region should set up their own facilities for processing C&D waste and reuse the products in 	<ul style="list-style-type: none"> • No mention of: <ul style="list-style-type: none"> - Dust control measures mandated to be adopted by all projects - Construction material should be kept covered within the premises. - Ensuring that carrying of construction material of any kind, particularly sand, cement, bajjari etc., is done after properly

	their own projects.	<p>covering the transportation vehicle</p> <ul style="list-style-type: none"> - Short term action plan is missing in the plan till the time NBCC & CPWD set up their own facilities - The State governments, the Public Health & Environment Department, PCBs and local authorities including the Municipal Corporations and DDA, should also be made responsible authorities
6.	<p>Mechanized Road Sweeping and managing road dust</p> <ul style="list-style-type: none"> • At present, it is reported that about 15% of road sweeping in Delhi is mechanized. This should increase to at least 40% in the next 4 months. • Delhi PWD, Irrigation Department and MCDs to take up greening or green paving of central verges, roadside berms, sides of drains, etc. over the next one year with monitorable targets. • Watering roadsides (pavement) and parking places by all the Municipal Corporations in Delhi to reduce dust as per agreed schedule. • Ensure SoPs are followed at construction sites in terms of curtaining and sprinkling water to reduce dust. • Municipal Corporations, UD Department have to implement a strong behaviour change campaign involving Resident Welfare Associations and Market Trader Associations on proper management of solid waste to improve air quality. 	<ul style="list-style-type: none"> • Mandate increased frequency of mechanized cleaning of road and sprinkling of water on roads. • Identify road stretches with high dust generation, before deciding and increasing the percentage of mechanised road sweeping either through wet or dry mechanism • Implementation of GRAP must be there, as and when concentration of PM_{2.5} crosses 500 ug/m³ and PM₁₀ crosses 300 ug/m³ • Authorities responsible must also include: <ul style="list-style-type: none"> - National Highway Authority of India - Traffic Police of Delhi and NCR
7.	<p>Improving Public Transport</p> <ul style="list-style-type: none"> • Procurement of additional buses and improvement of last mile connectivity. • Increase number of metro coaches • Journey Planner app integrating Metro, DIMTS and DTC services • Integrated ticketing across DTC, Cluster and Metro in six months • Ensure that non- destined trucks do not enter Delhi. 	<ul style="list-style-type: none"> • No proper timeline fixed for this • Also mandated the need to enhance infrastructure for this • Need for this to be user-friendly and a formulated timetable • No responsible authorities have been mentioned here. • No mention about mandatory BS-IV compliance for all new heavy commercial vehicle

	Ensuring compliance of the Toll and Municipal charges for entering of trucks in Delhi.	
8.	Reducing Congestion In collaboration with the traffic police, identify choke points and take up projects to reduce congestion at these points; Similar exercise may be done in respect of Meerut, Rohtak and Gurugram divisions	<ul style="list-style-type: none"> • Authorities must include PWD as well • Action plan did not talk about the need for arranging enough parking space • Restrictions must be put in place on parking in the roads • Heavy fines need to impose on vehicles parking on roads to avoid traffic jams

Conclusion: The action plan has been formulated to list key actions that the High Level Task Force will monitor along with agencies responsible as specified. However, the actions listed out are very basic and are incomplete to a great extent. In general it shows inconsistency with already operational action plans including the Comprehensive Action Plan, Graded Response Action Plan (GRAP) and also the various existing court orders, inconsistent listing of responsible authorities and overall lack of accountability towards betterment of environment.

We are sure, MoEF&CC would consider and acknowledge the issues raised and suggestions made, and let us know of the action taken. Thanks, with regards

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