



Delhi  
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To  
Dr Shruti Rai Bhardwaj  
Ministry of Environment, Forest and Climate Change  
Indira Paryavaran Bhawan  
New Delhi-110 003  
Email: shruti.rai@nic.in

**Subject: ERC's Suggestions on National Clean Air Programme (NCAP)**

Dear Dr Bhardwaj

EIA Resource and Response Centre (ERC) is a national level voluntary programme, keeping a watch on EC and FC processes. ERC regularly engages with Ministry of Environment, Forest and Climate Change (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. Here we are sending suggestions on the draft National Clean Air Programme (NCAP).

### **Broad Observations & Suggestions**

#### **Sick Nation Cannot Develop**

It is important that the central government is planning National Clean Air Programme the draft which has been released on 17 April 2018. We must certainly restrict increasing air pollution. The air pollution has made the nation sick and sick nation cannot develop.

## **Dissemination of Draft not Wide Enough**

NCAP has not been published in any other language except English. It is only available online and has not been made available in any other forms to the states to be shared with its citizens for any meaningful study and suggestions. This would drastically reduce suggestions.

## **Specify the Statute**

The Programme does not mention its statutory origin, whether it has been issued/proposed under the Environment (Protection) Act, 1986 or the Air (Prevention and Control of Pollution) Act, 1981. This is necessary for affected persons to have recourse of highlighting violations or non-implementation of the Programme's targets/ directives before courts, especially the National Green Tribunal.

The NCAP should clearly designate responsible agencies and authorities for monitoring, inspection and enforcement.

## **Specific Observations & Suggestions**

### **7.1 Mitigation in mission mode**

#### **Suggestions**

We need more of prevention i.e. steps need to be taken to severely restrict permission for highly air polluting industry and stop damaging practices e.g.

- No new coal fired thermal power plant.
- Government should not drag its feet in enforcing the Emission Standards for thermal power plants notified on 7 Dec 2015. There should be no postponement in enforcement.
- Expert committee should lay guidelines within three month for restricting new vehicles from entering the market while phasing out the old ones
- Farmers are ready to stop practices such as straw burning but need guidance. CPCB/SPCBs should provide them solution within six months.
- Licence of the brick kilns using old tyres as fuel should be cancelled with immediate effect.

### 7.1.1 Augmenting air quality monitoring network

7.1.1. (i) : At present, there are 691 monitoring stations spread over 303 cities out of 4000 odd cities in India. Addition of about 300 stations can not cater to the rest of the cities of the country. No clarity is there in the proposed draft NCAP as to which cities will be covered as part of the installation of around 300 new stations and how the data would be disseminated.

#### Suggestion

- Programme must attach a list of cities where additional monitoring stations are proposed in next two years.
- All cities should be covered in five years.
- Available monitoring data should be placed in public domain with immediate effect.

7.1.1. (ii) : The plan has proposed to increase the number of CAAQMS from 101 to 310 (210+100) in the next two years. This is a good move, but only an increase in one or two stations per city will not be enough to give air quality data in real time.

#### Suggestion

- Develop scientific criteria for selection of a city or area for installation of CAAQMS
- CAAQMS should be proportional to air quality, population and area of a city /region. Presently the situation is that NCT of Delhi with a population of 17 million has 14 CAAQMS while a State like West Bengal with a population of 92 million has only 5 CAAQMS.

7.1.1. (iv) : Adding 50 rural monitoring networks

#### Suggestion

- Besides the agriculture related pollution, most of the large industries are located in rural areas. We have around 6 lakh villages. There should be some rationale in developing rural monitoring stations. It should be based on population, size and number of states. The number should range between 1 to 10 in each State/UT depending upon the size and population and data made available in public domain.
- Monitor the ambient air quality by an industry should be considered by relevant authorities as representative of air quality in rural area where it lies and made available in public domain.

- Continuous Emission Monitoring System (CEMS) data collection by 17 red category industries should be available in public domain.

**7.1.1. (vii) :** Development of 10 city super networks is proposed under this draft NCAP. This may fall short when the objective of NCAP is considered. How can a network of just 10 cities showcase the air pollution dynamics for the entire nation?

#### **Suggestion**

- Ideally, there should be at least one city from each State and UT covered in this programme in next five years.
- The NCAP has talked about strengthening of the monitoring network at length; however it has completely ignored the major industrial emission sources. Emissions and air quality data from these sources should be integrated with manual and real time data sharing portals, websites and apps, so that common people can have access to information for understanding the pollution sources around, especially from a regional perspective.

#### **7.1.2 : Air Quality Management Plan for 100 Non-attainment Cities**

#### **Suggestion**

- We all know air pollution is not limited within the city boundary though large number of people are affected in cities. Furthermore, industrial growth happens outside the city limit. 'Air Quality Management Plan' for 100 Non-attainment Cities should thus include the industrial region around them.
- The listing of non-attainment cities should be rationalised. For example, the State of West Bengal has Kolkata as the only non-attainment city. It is unclear as to why cities like Asansol, Raniganj, Howrah or Durgapur, already listed as Critically Polluted Area (CPA) or Severely Polluted Area (SPA) in terms of air sub-component, have not been included in the list of non-attainment cities.
- All non-attainment cities should be immediately covered in pollution management. There is no time to wait.

#### **7.1.3 : Air Pollution Health Impact Studies**

Two health studies in collaboration with Ministry of Health and ICMR are planned.

### **Suggestion**

- There are several international air pollution health impact studies. They should not discard as un-realistic. If necessary they should be reviewed by experts and relevant institutions and there should be reasoned comments. Health impacts with respect to air pollution exposure is linked to diseases like cataract, lung cancers, low birth weight and other indicators of newborn and infant health, mental health, cases of Parkinson's disease and Alzheimer's, behavioural problems such as Attention Deficit Hyperactivity Disorder and also diseases like Chronic Obstructive Pulmonary Disease (COPD), which are well established globally. Besides, there were a few studies done by CPCB on air pollution and their related health impacts, in collaboration with Chittaranjan National Cancer Institute, Kolkata which clearly establishes the linkages between Air Pollution and Human Health, along with the Report of the Steering Committee on Air Pollution and Health Related Issues. We should learn from such studies instead of calling the currently available scientific studies as "unrealistic".
- The proposed health studies should be clearly defined in the Programme. Health impact study should not be restricted to just questionnaire surveys, but should also include real and scientific health assessment based on clinical data.

#### **7.1.5 : Setting up Air Information Centre**

### **Suggestion**

- Representatives of Civil Society Organisations (CSOs) should be officially involved in such centres and they must be given access to the data for analysis, interpretation, dissemination, issuing bulletin, and also to keep track of international developments and bring out policy updates.

#### **7.1.7 : Air Quality Forecasting System**

This is a welcome step, provided the forecasting results are used in right direction.

### **Suggestion**

The Programme should define the forecasting region and criteria of selection thereof, if the plan is not for the entire country.

### 7.1.8 Extensive Plantation Drive

#### Suggestions

- There are several questions regarding plantations. India has been in plantation drive mode for several decades. What is the result? How much is paper work? How much is actual plantation survival rate? What is being planted? The programme should have specific plan for next five year. This should not be clubbed with ongoing programme and should be additional plan.
- Industry should be mandated to take up specified greening drive (area, budget and time frame) besides the green belt development around their projects. Some state have initiated such action e.g. Chhattisgarh.
- Forests are carbon sinks. We must save them at any cost. Here we notice more and more forest is being diverted. It may be noted that during 2014-2017 forest diversion area was 451 sq km. Forest Advisory Committee even recommended diversion of 81 sq km of 'dense' to 'very dense forest' for non forestry activities besides other forest classes in 2017 alone. Forest diversion needs to be minimised. Forest areas /Tree cover in urban landscapes should increase by 10 per cent per year.

### 7.1.9 Road dust

#### Suggestion

- Road dust is clearly a major air pollutant. NHAI and State PWDs need to give more serious attention to the issue than mere issue of government Notification as proposed in the Programme. Clear guidelines should be formulated and implemented by road managing authorities within three months to reduce road dust pollution.

### 7.1.10 Intensive Awareness, Training and Capacity Building Drive

Though the MoEF&CC accepts the fact about lack of awareness and public outreach as one of the major hurdle in effective implementation of the air pollution management plan, however the proposed commitment under this draft NCAP is largely limited to the infrastructure & manpower increase in Central Pollution Control Board (CPCB) and State Pollution Control Board (SPCBs).

### Suggestion

- Clear process and targets for Awareness, Training and Capacity Building should be stipulated for Central Pollution Control Board (CPCB) and State Pollution Control Boards (SPCBs) for the next two years to begin with.

#### 7.1.12 National Emission Inventory

### Suggestion

- National emission inventorisation plan should be outlined industrial sectors-wise e.g. thermal power plant, coal mining, iron ore mining, sponge iron plant, transportation, cement plant, construction, which are major contributors to the overall air pollution load, and target for next five years set.

#### 7.1.15 Technology Support

The plan has extended technology support through a funding of INR 10 crore under this plan.

### Suggestion

- The Programme must specify the support target. Ideally, CSOs should receive the support to play a better roll in air pollution management. Such support should not be passed on to the private corporations.

#### 7.1.17 Extending Source Apportionment Study to all Non-attainment Cities (along with 7.1.2 Air Quality Management Plan for 100 Non-attainment Cities)

The Programme outlines the source apportionment study will be done in two years for 94 non-attainment cities, whereas the city action plan for 100 non-attainment cities will be formulated in one year.

### Suggestions

- Programmes 7.1.2 and 7.1.17 need to be harmonious. Without having an insight of pollution sources and intensity of source-wise pollution identification, formulation of city specific action plan does not make sense.

- The draft also state that, Source Apportionment studies will be done for only PM<sub>2.5</sub> & PM<sub>10</sub>. Secondary particulate formation from SO<sub>2</sub> and NO<sub>x</sub> which plays an important role in formation of PM should also be part of the study. There should be a phase-wise plan for conducting the source apportionment studies, with specific sector and task identified.

#### 7.1.18 Review of air quality standards and emission standards

##### Suggestion

- The Emission Standards for thermal power plants notified on 7 Dec 2015 should not postponement in enforcement. TPPs are major source of air pollution in the country.

#### 7.1.19 Institutional Framework

##### Suggestions

- The final programme should clearly delineation work among the responsible authorities. There should be clear division of powers and accountabilities for CPCB; SPCBs; PCCs; State Governments and District Authorities (Collectors, Magistrates or Municipal Commissioners etc.).
- There should be apex steering bodies consisting of representatives of concerned ministries/departments including Civil Society Organizations at the central and state levels.

#### 7.2 Target, Timeline and Cost

##### Suggestions

- Budget allocation for NCAP of Rs 637 crore is meagre for colossal problem like air pollution. This should be at least 10 times of what has been outlined subject to revision after one year of implementation.
- There should be rationalisation of budget heads and amounts outlined for them. Budget for infrastructure and manpower should rather be planned in the regular budget of the concerned organisations instead of passing on to NCAP budget.

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

Pushp Jain, Kankana Das & Arunita Bose  
EIA Resource and Response Centre (ERC)  
Legal Initiative for Forest & Environment (LIFE)  
N-71, LGF, G.K. I, New Delhi - 110 048. India  
Ph: 91-11-49537774, Web : [ercindia.org](http://ercindia.org);  
Email : [pushp@ercindia.org](mailto:pushp@ercindia.org); [pushp@lifeindia.net.in](mailto:pushp@lifeindia.net.in)