

Dated: 17th May 2018

To,

Dr. Shruti Rai Bhardwaj,
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Dr Harsh Vardhan,
Ministry of Environment, Forest and Climate Change,
Indira Paryavaran Bhawan,
Jor Bagh Road, Aliganj,
New Delhi-110 003,

Dear Dr. Bhardwaj,

Subject: Letter from Concerned Citizens and Organisations regarding “Stakeholder Comments on National Clean Air Programme, (NCAP) .

The Ministry of Environment, Forest and Climate Change (MOEF&CC) has uploaded a draft policy on the National Clean Air Programme (NCAP) on Tuesday, April 17 2018(<http://www.moef.gov.in/sites/default/files/NCAP%20with%20annex-ilovepdf-compressed.pdf>). Please find below the comments from various stakeholders like Civil Society Organisations (CSOs), farmers representatives, citizen groups and academics on the draft NCAP.

We hope that MoEF&CC would take the following recommendations into consideration and strengthen the National Clean Air Programme to ensure that the problem of air pollution is addressed in a time bound manner.

Comments

1. The draft NCAP clearly misses the discussions held within the ministry about making the programme time bound and having specific targets, i.e., in October 2017 page 31 of the file notings on NCAP has the following “...Kindly refer note pre-page 5-9/N regarding approval of Concept Note and outline for National Clean Air Programme (NCAP) targeting to reduce 35% pollution within next 3 years and 50% of pollution level in next 5 years. Hon’ble MOEF&CC has noted at 9/N that Ministry may initiate everything aggressively after the parliament session is over.” The same was also mentioned by the honorable minister Dr **Dr. Harsh Vardhan** in a public forum back in February 2018-

<https://economictimes.indiatimes.com/news/politics-and-nation/hope-to-cut-air-pollution-in-100-cities-by-50-in-next-5-yrs-harsh-vardhan/articleshow/62904958.cms> NCAP without such targets is a meaningless document which cannot result in effective, absolute pollution levels reductions. Hence, we recommend that the MOEF&CC should incorporate the 35% reduction in three years and 50% reduction in five years as targets to make NCAP effective

2. The draft NCAP is only in one language (English) which does not allow the impacted population to be part of the process for even commenting on the draft, it should have been made available in other regional languages as well at-least in those languages, which are widely spoken by the community mostly impacted by hazardous pollution levels. Hence, we recommend that MoEF&CC translate NCAP into regional languages and extend the deadline for public consultation by at least one more month.
3. Draft NCAP has ignored polluting sectors like industry and coal thermal power plants, which are regulated by the central government. Given the regional nature of the problem and the fact that pollution is not restricted only within cities. Highly polluting industries and industrial clusters should be regulated under NCAP with clear timelines and targets for implementation.
4. NCAP needs to have clear interim milestones for all the activities it's proposing even under section 7.2 giving budgets and timelines. Milestones are crucial for evaluating the success of NCAP and the same interim milestones should also be extended to sectors like industry and power plants.
5. NCAP seems to be outsourcing all implementation and budgetary responsibility to the states. This could lead to inaction because of the lack of capacities of State Pollution Control Board. To ensure uniformity among states on quality action plans and to ensure that inter-state issues are addressed to tackle air pollution regionally. The central government should play a more involved role in capacity building of states and significantly increase budgetary allocations to states for implementation of action plans.
6. Draft NCAP misses out on including high polluted cities like Gurgaon, Faridabad, Bulendshahar, Muzzafarnagar, Patna, Gaya and Muzaffarpur etc. in the list of polluted cities, even though they made to the list of top most 20 polluted cities in world according to recent WHO report. Hence, there needs to be a relook at the process of selection of cities.
7. The programme lacks sector-specific plans for emission caps (Coal Consumption for Power Generation and Industries; Vehicular emission load and registration etc.) and emission reduction targets. The programme should have targets similar to what European Union uses to ensure progress in all Member States;and what China had when it started cleaning the air in 2012 through Emission standards for power plants and Action Plan in 2013 for reducing air pollution levels by 2017. To ensure that air pollution levels come down and remain low in the long-term, cumulative carrying capacity of regions should be assessed before expanding internal combustion vehicles, industries and power plants in the future.

8. The number of cities covered under NCAP is limited to 100 non-attainment cities based on data available from National Ambient Air Quality Monitoring Programme (NAMP) stations between 2011-2015, but 2015/2016 data published by Greenpeace India in their latest report "Airpocalypse-II" in January 2018, suggested that at least 228 cities out of 280 (for which they were able to collect data out of total approximately 300 cities covered under NAMP now) were above the Indian annual PM10 standard of 60 $\mu\text{g}/\text{m}^3$ and should be classified as non-attainment. Furthermore, satellite-based estimates convey an even more worrying picture, with almost the entire country under hazardous pollution levels. So the coverage of NCAP should not just be limited to the list of 100 cities as mentioned in the concept note and should be extended to other polluted geographies as well.
9. "Road Widening and supporting development of such infrastructure (flyovers) within cities" as suggested under the letters issued to SPCBs/PCCs in 2015 and 2016 are likely to result in an increase in emissions, as they promote private ownership and use of vehicles. To decongest the traffic more emphasis must be given on promoting/strengthening the Non-Motorised Transport (NMT) and public transportation, which are long term sustainable solutions also highlighted under NUTP (National Urban Transport Policy).
10. NCAP fails to highlight the need for controlling the unsustainably increasing private transport in Indian cities. Important mechanisms such as implementing congestion charge, which have worked very well in reducing private transport and help building public transport in cities such as London are missing from NCAP. Many countries across the world are moving on banning diesel vehicles due to pollution and health impacts arising from them, India should learn from them and adopt similar approaches.
11. NCAP should have more emphasis on Electric vehicles/Buses etc. Along with parallel infrastructure development to make sure that these electric vehicles are charged with electricity from renewable sources to bring reduction in emissions and eventually air pollution.
12. It is not clear how NCAP overlaps with other laws and plans that govern the cities and sectors. It has no mention of the emission norms set for power sectors and industries, likewise does not talk about integrating with city level plans like the master plan and municipal solid waste rules etc. Hence there should be a better integration at all levels.
13. As expansion of industrial and thermal power plant capacity are one of the key drivers of India's air pollutant emissions growth, approvals for new industrial capacity should take into account the current air pollutant levels and cumulative impacts from already approved and planned new sources in polluted regions and specifically across the entire Indo-Gangetic plain.
14. NCAP must have holistic approach to tackle the issue of stubble management. Currently the approach is isolated. Both "in-situ crop residue management" and creation of infrastructure and market for the use and management of stubble outside of the field ("ex-situ" management) should be incorporated in NCAP.

15. A comprehensive urban waste minimization and segregation policy should be integrated with NCAP to control air pollution.
16. For participatory approach under NCAP, we must have a comprehensive structure for people to participate in planning, execution, implementation and monitoring of the progress under NCAP.
17. Emergency response action plans such as Graded Response Action Plan (GRAP), should be strengthened to be more effective by covering all sources of pollution comprehensively and systematically, precautionary rather than being reactionary (in current version) by being based on forecast. Along with implementing it across all polluted cities and regions in the country and not just limiting it to Delhi-NCR, So that advisories to industries and public can be issued in emergency situations.
18. The NCAP must be linked to some statutory Act, like Air Act, 1981 – to make it enforceable so that if public want to address the fact that this NCAP has not been implemented, they can approach court.

Comments on the issues directly addressed in the Concept Note on National Clean Air Programme:

7.1.1 Augmenting Air Quality Monitoring Network:

- A. While adding approximately 300 more manual air quality monitoring stations in cities and 50 stations in rural areas along with PM_{2.5} monitoring facilities is a good step but the specificities on how the data will be shared with minimum time delay, systematically and in an accessible way with public, and at-least state-wise allocation of these stations to be installed needs to be specified.
- B. Increasing the number of CAAQMS from 101 to 310 (210+100) in next two years is a good initiative but the number of CAAQMS should be much more (beyond just 310) even beyond city boundaries, having 1 monitoring station in a city or only 100 cities having 2 or more CAAQMS is not going to help building a proper advisory network (out of which Delhi alone has more than 35 CAAQMS).
- C. One station in each city in the 10 city Super Network is insufficient to give the representative air quality of the area, so a more comprehensive and systematic approach is required to set-up such networks which are envisaged to represent national air quality dynamics.
- D. The mention of identification and development of alternative cost-effective technology for sources and ambient air quality monitoring is a good step but special emphasis on community air quality monitoring and role of low cost air quality monitoring devices should be added so that the reach of data on air quality can penetrate to larger sections of the society.
- E. Data from Continuous Emission Monitoring System (CEMS) and ambient air quality monitoring stations installed in vicinity of the industrial plants and facilities is not available in public domain (specifically for 17 red-category industries). Making already generated data on emissions and air quality

available is of essence for effective air quality management. The NCAP needs to strengthen monitoring of major industrial emissions 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 and understanding of the pollution sources around in larger geographies and localities around them (industrial clusters, including in rural areas).

- F. Mobile air quality monitoring units such as Mobile vans and drones should also be used to have a wider coverage of air quality data monitoring.

7.1.2 Air Quality Management Plan for 100 Non-Attainment Cities and 7.1.17 Extending the source apportionment studies to all non-attainment cities:

- A. The formulation of Air Quality Management Plan for 100 cities is a great step but there seems to be confusion in terms of timelines and process through which they were prepared. Ideally, such plans are either based on large polluting sectors for regions or are based on specific source-apportionment studies. The timeline for making the plan is 1 year and for source apportionment studies to be completed is 2 years, which leads confusion without mentioning how do we intend to use source apportionment once we already have the management plans.
- B. Also, the schedule of initiation and completion of all 100 source apportionment studies within 2 years should be provided along with interim timelines.
- C. In order for the source apportionment studies to be useful, it is crucial to create unified guidelines for sampling, analysis, emission inventory and atmospheric modeling methodologies to be used, as well as unified source categories.

7.1.4 Air Pollution Health Impact Studies:

- A. The study already conducted by CPCB on Air Pollution and Health Impacts in collaboration with Chittaranjan National Cancer Institute, Kolkata clearly establishes the linkages between Air Pollution and Human Health, along with Report of the Steering Committee on Air Pollution and Health Related Issues. We should learn from those studies rather than call best currently available scientific studies “flawed” and “perplexing” as the draft NCAP, astonishingly, does.
- B. Health Impact study should not be restricted to questionnaire surveys, real and scientific health assessment based on clinical data must be incorporated in NCAP.
- C. Health Impacts other than lung function need attention including cardiovascular diseases - by far the main source of mortality associated with air pollution exposure, cataract, lung cancers, low birth weight and other indicators of newborn and infant health, mental health, increase in cases of

parkinson and alzheimer, behavioural problems such as ADHD, could be manifestation of air pollution.

- D. NCAP should incorporate Data on Stroke, Ischaemic heart disease, Chronic Obstructive Pulmonary Disorder (COPD) etc. and ensure underlying mechanism/causative effects on such disease.
- E. More details should be available in public domain on proposal to Study on Air Pollution (Indoor/Ambient) and health impacts in terms of funds, resources, etc.

7.1.5 Setting up Air Information Centre:

- A. Representation of Civil Society Organisations should be ensured in such centres which will be responsible for data analysis, interpretation, dissemination, issuing builtins, keeping track of international developments and bringing out policy updates.

7.1.6 Certification system for monitoring instruments:

- A. Accreditation body should also provide accreditation for low cost air quality monitoring devices.
- B. Accreditation body should ensure the regular calibration of the air quality monitoring devices and the data quality for data generated by them in collaboration with the Air Information Centre.

7.1.6 Air Quality Forecasting system:

- A. Interim milestones (timelines) with number and names of areas covered under the system should be highlighted clearly for proper accountability and monitoring the progress.

7.1.7 Extensive Plantation Drive:

- A. Apart from plantation drives NAPC should have plan to protect forest and other vegetation across the country and within the cities.

7.1.9 Issuance of Notification on Dust Management (Road dust and C&D):

- A. Strict compliance to rules under Construction and Demolition Rules, 2016

7.1.18 Review of ambient air quality standards and emission standards-

- A. While coming up with new and modified standards international best practices and emission standards from other countries/geographies should be compared and the best and most stringent standards should be adopted keeping the futuristic approach and public health at priority rather than just the short term industrial interests.
- B. Formulated emission standards should also be implemented and there should be clear timelines and plans to be formulated while coming up with the standards in a transparent manner with publicly available progress and data.

7.1.19 Institutional Framework-

- A. The institutional framework should have more division of powers and accountabilities for CPCB; SPCBs; PCCs; State Governments and District Authorities (Collectors, Magistrates or Municipal Commissioners etc.), For better accountability of their actions and inactions and the NCAP should ensure inclusion of civil society organizations in the framework at city, state and national level.
- B. NCAP should ensure more coordination within MOEF&CC and with other Ministries is missing in NCAP And NCAP cannot be a success without inter ministerial and departmental coordination at all levels.

Last note in the NCAP Concept note mentions, "It is to be noted that cost for city specific action plan implementation which will entail major cost is not reflected as part of this NCAP and will have to be majorly borne by the States"- therein the NCAP should provide provisions of fund availability by MOEF&CC/Central Government to the states and SPCBs so that actual actions can be taken and the actions are not left in proposed states due to absence of funds and clarity from states. A more clear outline and fund availability/help from Central Government to states for NCAP implementations should be included in final version of the NCAP.

With Thanks and Regards

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24. Shweta Narayan, Healthy Energy Initiative- India
25. Gargi Mitra, Kolkata Clean Air
26. Stalin Dayanand, Director Vanashakti, Mumbai
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38. Anirban Gongopadhyay, Founder Jorro Networks (ICARe Program)
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79. Tarique Shafique, Tabeer, Uttar Pradesh
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