

**NON-IMPLEMENTATION OF NOTIFIED EMISSION STANDARDS
LEADING TO A PUBLIC HEALTH CRISIS
DEADLINE TO COMPLY IS OVER BUT POLLUTION STAYS: PUBLIC DEMANDS ACTION**

To,
Dr. Harsh Vardhan
Minister of Science & Technology and Earth Sciences
Minister of Environment, Forest, and Climate Change
M.B.B.S., M.S. (E.N.T.)
8 Tees January Marg
Delhi 110001, INDIA

7th December 2017

Dear Sir,

We are a group of concerned citizens and organisations and today we represent 1,35,000 Indian voices. We have been working on various social, environmental and natural resources issues related to coal fired thermal power plants (TPPs). In particular, we have been concerned with the serious implications of emissions from coal based thermal power plants, and the massive use of water by these facilities. We want to appreciate the efforts made by the Environment Ministry for passing strong emissions norms for thermal power plants across India. These regulations were put in place in 2015 and meant to come into effect this year. This is an important step in reducing toxic air pollution across the country, and safeguarding Indian lives and environment.

We write to you on behalf of more than 1,35,000 Indians who demand strict actions from MOEF&CC to implement the emission standards for coal based power plants and achieve breathable air quality across the country. These emission standard norms were announced two years ago, however, we have not seen any action, instead we have witnessed intense lobbying by the power sector to look the norms appear redundant. We're at a critical stage, either we can be leaders or laggards in combating air pollution. One on hand, we have ambitious targets for producing renewable energy, but we must address the air pollution crisis simultaneously and urgently.

The impacts of air pollution are far reaching and have devastating economic¹ and health² costs. It is a national problem that is killing 1.2 million Indians every year; costing the economy an estimated 3% of GDP. Studies have linked PM exposure to health effects in both, the short and the long term, with a marked increase in pollution-linked ailments from redness in the eyes to lung cancer and heart attacks. The Central Pollution Control Board (CPCB) has, in its own reports, demonstrated the impact of Air pollution on Children in Delhi³

Various researchers have established that a major portion of the PM (Particulate Matter) emission in the country comes from the industrial sector, especially from coal based thermal power plants⁴. A significant share of India's total PM emission is also contributed by secondary particles formed by SO₂ and NO₂ emitted from thermal power plants. Recent research has also shown that India has become the highest emitter of SO₂ emission in the world due to uncontrolled emission from coal based power plants in the country⁵.

While we appreciate the measures that the Ministry has already taken to mitigate the menace of Air Pollution, we would like to stress the need to drive much bolder, more concerted efforts at a national scale to resolve this national crisis of monstrous proportions. In particular, we laud the Ministry's efforts to introduce the December 2015 amendment to the Environment (Protection) Act of 1986. We would also like to congratulate the MoEF&CC

¹ <http://documents.worldbank.org/curated/en/220721468268504319/pdf/700040v10ESW0P0box0374379B00PUBLIC0.pdf>

² <http://ghdx.healthdata.org/gbd-results-tool?params=querytool-permalink/ee2de12af8e3068b706ab7741c7a8cc5>

³ http://cpcb.nic.in/upload/NewItems/NewItem_191_StudyAirQuality.pdf

⁴ http://delhi.gov.in/DoIT/Environment/PDFs/Final_Report.pdf

⁵ <https://www.nature.com/articles/s41598-017-14639-8>



for introducing the Bharat Stage VI vehicular emission norms and the measures being taken to keep stubble and crop residues burning in Punjab and Haryana in check. The recent Graded Response Plan⁶ is also a good start but needs to be much more comprehensive.

Positive moves like these, however, will only be offset and rendered meaningless if emission standards introduced in 2015 are not implemented as soon as possible.

We express serious concerns about any such move and urge the Ministry to oppose any efforts to undermine their authority, undo the progress made, and take us many steps back in our collective fight for a cleaner and greener India. We urge the government to immediately come up with strict, implementable deadlines and a concrete roadmap for each plant to ensure compliance which should be made available on public platforms for close monitoring by various stakeholders. This is a unique opportunity to make Thermal Power Plants more efficient and move forward in the fight against air pollution.

1,35,000 Indians have signed on our petitions to demand a robust National Clean Air Action Plan and strict enforcement of the emission standard notification without further delay. People from all walks of life, from all across the country, have signed onto this petition due to their concerns about the growing menace of air pollution and power sectors contribution to the same. Together, they have shared their concerns over the health risks of air pollution leading to 1.2 Million deaths annually; 35% of children now exhibiting poor lung health; the degrading quality of air in Indian cities with more of them increasingly becoming being included in the list of the world's most polluted cities; and the threat of any dilutions of coal based TPP emission standards.

Along with these 1,35,000 Clean Air Nation campaigners; we are calling on the Government of India to take strict action on the power plants which are in violation of the law and to immediately come up with a time bound plan for implementation of the emission standards for each and every power plant in the country. This should be made available on public platforms for close monitoring by various stakeholders. We believe that strict compliance to the emission standard notification will help us move aggressively towards a Clean Air Nation.

The Ministry of Environment, Forests & Climate Change, must adhere to its commitment to combating the crisis of air pollution, and help India in taking a lead internationally in the global battle against climate change. Today, we stand with our partners, as a movement representing people of India who wants MOEF&CC to secure their fundamental right to **healthier** and **cleaner** environment.

Thanking you

ENCL:

1. A fact sheet on the risks posed by dilution of Thermal Power Plant Emission Standards
2. Snapshot of the Petition pages having more than 1,35,000 people supporting the demand for Clean Air Nation and strict implementation of the emission standard for coal based power plants across the country
3. Out of Sight report
4. RTI Replies from Power Generator shown non-compliance to the emission standard notification
5. Representation/Letters form 63 organisation to MOEF for strict implementation of the emission standard notification dated 19th June 2017-12-06
6. News article by Times of India dated 31st March 2017, "Thermal plants must meet emission norms: Environment ministry"
7. Loksabha and Rajyasabha discussion mentioning MOEF&CC's commitment to implementation of 7th December 2015 notification

⁶<http://envfor.nic.in/sites/default/files/Gazette%20Notification%20dated%2012.01.2017%20entrusting%20implimentation%20of%20Graded%20Response%20Action%20Plan%20to%20EPCA%20.pdf>

