

October, 29, 2020

Dear Prakashji

This is with reference to the ordinance issued today, which establishes the Commission for Air Quality for NCR and adjoining areas. We welcome this move as it clearly shows the intent and determination of the Union government to mitigate toxic pollution in the region. As chairman and one of the members of the now dissolved Environment Pollution (Prevention and Control) Authority for NCR (EPCA) we would like to place on record our gratitude for the opportunity given to us to address air pollution challenges.

Over the past many years, we have worked to find solutions and to recommend action through our reports to government and to the Hon'ble Supreme Court. We are grateful for the consideration given to our work and to the fact that many of our recommendations have been implemented.

With this letter, we are putting down for the attention of your ministry and for the Commission, a brief listing of the work done and of the work that is currently underway.

Action taken on basis of EPCA's recommendation and its impact on air pollution

Sno	Action taken	Impact
1	Notification of Graded Response Action Plan (GRAP)	Has provided for an emergency action plan for the critically polluted months of winter; GRAP allows for urgent remedial steps to be taken to reduce air pollution in the region. This has been implemented over the past 3 winter seasons with considerable success in enforcement
2	Finalisation and notification of the Comprehensive Action Plan (CAP) for air pollution control	The objective of this exercise was to lay out the different sources of pollution and measures that need to be taken; many measures have been implemented and now fourth-generation actions should be considered and undertaken
3.	Construction of Regional Rapid Transit System (RRTS) for inter-city travel and mobility transformation	Based on EPCA's report, the Hon'ble Court directed that these corridors should be constructed. Meerut-Delhi RRTS corridor is underway and the remaining corridors need to be expedited. The construction of these high-speed rail corridors will reduce the need for road travel in the region
4.	Delhi Metro phase IV construction cleared after resolving outstanding issues as recommended by EPCA	Decision on phase IV was pending since 2014; delay was jeopardizing public transport connectivity in the city; in this phase, metro will add 18.6 lakh riders per day and reduce the need for private transport
5.	Early phase-in of BS VI fuel and emission standards as of April 1, 2020	EPCA report no 71 and 76 had recommended this to the Union government and Hon'ble Supreme Court. The introduction of substantially cleaner vehicle technology and the leapfrog over BS V emissions will bring gains in the coming years as fleet transitions take place

6.	Strengthened PUC for controlling on-road emissions from vehicles	Based on EPCA's findings and recommendations, Ministry of Road Transport and Highways has brought about improvements in the system and this needs to be carefully monitored for continued compliance
7.	Remote sensing for on-road emissions	Based on EPCA's report no 99, the Hon'ble Court has directed that remote sensing technology should be used for monitoring emissions of in-use vehicles
8.	Restrictions on heavy-duty truck entry into Delhi through ban on non-destined vehicles; imposition of Environment Compensation Charge (ECC)	Truck traffic was a major contributor to pollution and EPCA recommended the imposition of ECC as a deterrence and followed it up with the setting up of the RFID system to move away from cash to improve enforcement. RFID has been set up in 13 locations and as a result, the number of trucks entering and traversing through the city have reduced from roughly 40,000 per night to 4000 per night. In 2019 there was a 95 per cent reduction in total PM and NOx load from truck segment as compared to 2015.
9.	Commissioning of the Eastern and Western expressways	EPCA had recommended these two bypass roads in 2004; which were commissioned in 2019 through the efforts of the Union government.
10	Hydrogen-CNG for buses to reduce in-fleet emissions from CNG vehicles	The pilot project was mandated by the Hon'ble Supreme Court and funds provided from ECC on the basis of EPCA's recommendation. The pilot has been launched and now the implementation and scale-up must be carried forward
11.	Ban on pet coke and furnace oil in NCR states and ban on import of pet coke	Pet coke and FO were the most polluting fuels used in boilers in the region; the nationwide import ban has also benefitted other equally polluted regions
12.	Setting up of standards for SO2 and NOx for 23 industrial sectors	SO2 and NOx emissions are a major contributor as these form secondary particulates. Based on EPCA's recommendations, nation-wide standards have been set so that enforcement is possible for emission control from industries
13.	Approved fuel notification for Delhi and other states of NCR	Based on EPCA's recommendation, Delhi has banned the use of all polluting fuels, including coal in its approved fuel notification. However, other NCR states have allowed use of coal, while banning use of pet coke and other polluting fuels. This will need to be further worked on as usage of coal in boilers is adding greatly to the pollution challenge in the region.
14.	Closure of Badarpur power plant and the operationalization of Bawana gas-based power plant	Coal based power plants without the implementation of 2017 emission control standards are contributors to pollution. The emission inventory had also included flyash from power plants as a key contributor. The objective is to move from coal to natural gas.
15.	Implementation of the power plant standards and setting up of the deadline of 2022	Based on EPCA reports, the Hon'ble Court has mandated that all power plants will meet the 2015 MOEF&CC set emission norms by 2022 as against the demand of the power sector to extend the deadline till 2025. Compliance with these directions will be critical for clean air

2. Key work that is with EPCA that needs to be expedited and implemented through the new Air Quality Commission

S no	Action to be implemented	Importance and Status
1.	Implementation of parking policy/rules in Delhi and NCR cities	On 10.8.2020, the Hon'ble Court has directed that parking plan has to be implemented across Delhi and NCR. EPCA has discussed this with municipal corporations and sent an advisory on the steps that need to be taken for implementation. The pricing of parking for private vehicles is an important element of the mobility transformation and so this will need to be expedited
2	Augmentation of buses in Delhi as per the schedule directed by the Hon'ble Supreme Court	EPCA had brought to the attention of the Hon'ble Court that the city needs an urgent increase of bus numbers; against the demand of 11,500, there were only 5279 (in July 2019) and that these were aged – DTC has not procured a single new bus for the past 10 years. Based on the report and the discussions with government of NCT-Delhi, the Hon'ble Court has directed time-bound introduction of buses. This needs to be monitored and complied with
3.	RFID extension to all 113 entry points into Delhi by January 31, 2021	RFID has moved the system of collection of ECC from cash to cashless; the Hon'ble Court has directed that this must be implemented across all points. The South Delhi Municipal Corporation (SDMC) must ensure compliance.
4.	Ban on use of imported pet coke in the steel industry	EPCA has after careful deliberations recommended (Report no 107) that steel industry should not be allowed to use pet coke as was its demand. The final decision on this matter is awaited and if allowed it could open the floodgates for usage of highly polluting pet coke in different industrial sectors.
5.	Hot spot pollution control, particularly with regards to industrial and household solid waste management	EPCA has worked with municipal and other authorities to prepare time-bound plans for different pollution hot-spots in the region. It's inspections and efforts have led to reduction in pollution in some areas but it has found that unless long-term solutions to problem of solid waste; stack-pollution and dust management is found, pollution in these areas will not be mitigated.
6.	Bio-medical waste management in light of the COVID-19 pandemic	Based on EPCA reports no 110 and 112, the Hon'ble Court has directed steps for management and effective collection, disposal and processing of biomedical waste. It is urgent that these measures are implemented for compliance
7.	Action to control stubble burning	EPCA had endorsed the Union government plan for management of stubble in the states of Haryana, Punjab and UP. On 28.2.2019 the Hon'ble Court has directed actions for implementation. EPCA report no 117 details the current steps taken and what needs to be done for in-situ and ex-situ management of crop residue. This needs to be monitored closely for implementation so that this seasonal source of pollution is addressed and mitigated.

Furthermore, the next-phase of the agenda for clean air; fourth generation reforms need to be deliberated upon and implemented. That will necessitate the massive augmentation of intra-city public transport and the move industries, power plants and other users away from polluting fuels like coal to natural gas, electricity and renewables to ensure clean combustion.

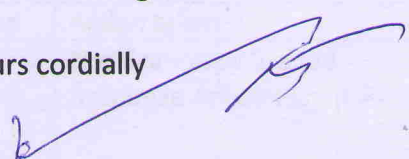
We hope that the above listing will help your ministry in following up the necessary actions for combatting pollution in this region. We believe that the Commission for Air Quality for NCR with its increased participation from different ministries and much more enhanced role and powers will be able to make a huge difference and bring us citizens the much needed relief from breathing toxins.

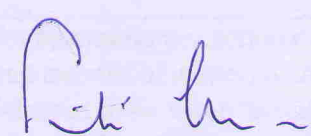
We welcome this effort by your government to put the issue of air quality high on the agenda and to build the institutional framework for action.

Once again, we would like to thank you for the opportunity and extraordinary privilege to be part of this challenge of clean air; blue-skies and clear lungs.

With warm regards

Yours cordially


Bhure Lal (Chairman)


Sunita Narain (member)

To,

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