



11 May, 2018

Dr. Harsh Vardhan  
Honourable Minister  
Ministry of Environment, Forest and Climate change (MoEFCC)  
Government of India  
Indira Paryavaran Bhawan  
Jor Bagh Road, New Delhi- 110003

**Subject: Recommendations on the National Clean Air Program (NCAP) issued  
by the Ministry of Environment, Forest and Climate change**

Honourable Sir,

Greetings from CEED!

I am writing to you on behalf of the Centre for Environment and Energy Development (CEED). CEED is a solution-driven research and evidence-based advocacy group which works for creating inspiring solutions to ensure a healthy, clean and sustainable future. Our mission is to inspire people to take action using innovative solutions to protect the environment and ensure a sustainable Living. We engage with all relevant stakeholders including the government, industry, policy think-tanks, civil society and the masses to provide an interactive, inspiring and positive platform to derive efficient solutions on environmental and energy issues.

First, we would like to congratulate your ministry for the announcement of the National Clean Air Program (NCAP). It is encouraging to see that the government is showing leadership in improving the air quality and protecting citizen's health. We also commend your initiative to provide access to the NCAP in the public

domain and to invite comments. The inclusion of public participation in the planning process will maximise its full potential.

The NCAP details an ambitious program by setting a goal of meeting the annual average air quality standards across 100 non-attainment cities of India. It articulates the framework of revamping the existing monitoring infrastructure and the formulation of an air quality management plan. However, under the NCAP the monitoring and planning process has been focused on, largely with a major responsibility of implementation to states without specific resource allocation and guidelines for the capacity building of state agencies. NCAP also fails in considering some important aspects of air pollution management which we have highlighted as a part of our recommendations.

On behalf of CEED, I am sharing a set of recommendations, mentioned below for improving the present document of the NCAP and we hope that these recommendations get incorporated in the final framework document of the NCAP. Here are the recommendations that the National Clean Air Program needs to consider:

1. Missing Emission Reduction Targets – The draft concept note for NCAP had pollution reduction targets of 35% in three years and 50% reduction in five years however these targets have been removed in the document issued for public comments. The NCAP needs to set overall emission reduction targets along with sector specific targets as well.
2. NCAP must have clear implementation framework and monitoring of emissions reduction targets for it to be truly effective.
3. There is no mention of Bihar cities in the list of non-attainment cities annexed (Annexure VII) in the NCAP although Bihar is mentioned in section 7.1.1 under enhancing continuous ambient air quality monitoring stations along other states of Indo-Gangetic plains. The list of cities under NCAP needs to be updated based on the latest available data and it should not be based on 2011–2015 data.

4. The NCAP discusses about the revision of guidelines on monitoring of air quality in sub section V of 7.1.1. The current guideline says to have minimum 104 days of observations in a year in manual monitoring, which is insufficient and incapable in the current scenario. The revisions of air quality monitoring guidelines should consider the fact and issue necessary directions.
5. The State Government and State agencies are critical for implementation of city specific action plan under NCAP. Therefore NCAP must increase funding for states and also includes the capacity building for them.
6. NCAP talks about promoting low-cost indigenous monitoring stations. NCAP needs to facilitate private investment and citizen involvement in such initiatives to broad-based air quality monitoring.
7. It is not clear how NCAP overlaps with other laws and plans that govern cities and sectors. NCAP must integrate the action plan with city levels plans like the master plan and municipal solid waste rules etc.
8. NCAP only focuses on cities while it acknowledges that the pollution is a problem in rural areas also, hence it has to take a more regional approach to be equitable to all India and not just cities
9. Given the wide spectrum of sources of air pollution and trans boundary nature of air pollution, NCAP must address the framework for coordinated regional efforts to control the air pollution.
10. NCAP talk about participatory process and collaborative approach and the concept note has no clarity on how it will facilitate this process. We suggest NCAP include community engagement process in implementation framework.
11. One main objective of NCAP is public participation but the document is not available in any local language or neither MoEFCC has conducted wider consultation with the public so far, which is a big gap and the final document should address this concern.

We, at CEED thank you for your efforts to bridge the gaps that exist in the improvement of air quality. We hope to work with the ministry to achieve a healthy and breathable air for all.

Regards



Ramapati Kumar

Chief Executive Officer, CEED

A1-248, 2nd Floor, Safdarjung Enclave, New Delhi-110029

Copy to

1. Honourable Minister, Environment and Forest Department, Govt. of Bihar
2. Chairman, Bihar State Pollution Control Board, Govt. of Bihar