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## RETHINKING CLEAN AIR PLANNING IN A POST-PANDEMIC WORLD

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India's coronavirus lockdown shut factories, kept vehicles off the roads, caused power demand to plummet, and reduced particulate levels in cities by 20-50 per cent early last year. Temporary improvements in air quality during the pandemic, both at home and abroad, offered a glimpse of what we could achieve through strategic and sustained efforts to rein in major pollution sources. One such initiative is India's ambitious National Clean Air Programme (NCAP), which aims to cut particulate matter concentrations by 20-30 per cent by 2024. At the core of this policy are customized clean air plans for cities found to be violating National Ambient Air Quality Standards (NAAQS), also known as "non-attainment" cities. The NCAP plans are meant to outline sector-specific, actionable strategies with clear targets and timelines, but the mechanism's nuts and bolts need attention. Here are five ways in which the policy can be improved.

Firstly, **make the preparation and periodic revision of clean air plans** mandatory under the Air (Prevention and Control of Pollution) Act (1981) for all cities given "non-attainment" status. In the U.S. and the European Union, states and member nations are legally mandated to periodically update clean air plans for regions found to be violating air pollution standards. In India's case, the city-specific clean air plans outlined in the NCAP were drafted in response to a National Green Tribunal order. Without a legal provision to ensure that the plans will be periodically reviewed and updated, they risk remaining a one-time exercise.

Secondly, **use information on pollution sources to set priorities**. Researchers at the Council on Energy, Environment and Water (CEEW) reviewed 102 city clean air plans submitted under NCAP and found that only 25 per cent incorporated information on the pollution contributions of various sources while formulating control strategies. While such knowledge should be used to prioritize action points based on each city's unique challenges, we instead see multiple cities across several states using similar plans. For instance, all but one of Uttar Pradesh's 16 non-attainment cities – the second-highest number in a state after Maharashtra – have the same 56 actions for transport, road dust, vehicles, waste burning, industries, construction, and demolition.

Thirdly, **plans should clearly delineate the responsibilities of participating agencies**. CEEW analysis indicates that over 40 per cent of the activities they list are shared by multiple agencies, including State Pollution Control Boards (SPCBs), urban local bodies (ULBs), and the state department of transport. This framework could result in fragmented accountability and hinder cooperation and coordination. Each agency should instead be assigned specific roles, such as planning, implementation, enforcement or monitoring.

Fourth, **budget the financial needs for each measure**, identify potential revenue streams, and raise funds to execute actions. Currently, only 9 out of the 102 approved NCAP plans provide budgetary requirements for implementation. States need to calculate expenses to ensure that their city plans are cost-effective. In doing so, they must keep in mind that some action points need core infrastructure development or expensive capital goods like mechanical

street sweepers or real-time monitoring stations.

Finally, **establish robust trackable indicators to oversee the progress and impact of the interventions.** For example, the Ministry of Health and Family Welfare monitors the number of COVID-19 vaccine doses released through the Co-WIN dashboard to track the progress of the national vaccination programme. SPCBs should set up similar tracking mechanisms across sectors, using specific metrics to capture the progress made on each action point. This exercise helps policymakers understand which strategies work and which ones need modification for better results.

Clean air is still a faraway dream for many in India. But with better planning and structural changes in the country's air quality management, it does not have to be an impossible one.

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