

ENVIRONMENT POLLUTION (PREVENTION & CONTROL) AUTHORITY
for the National Capital Region

Dr. Bhure Lal
Chairman

EPCA-R/2018/L-103
November 14, 2018

Dear

Prashantaji,

This is regarding my mail of November 12, 2018 on the matter of restricting private vehicles during severe and prolonged pollution episodes. I would be grateful if you can discuss the following matter in the GRAP Task Force and revert back to me for further consideration of the issue at EPCA.

Currently, the NCR region has recovered in terms of air quality because of the rains of last night. We are in the very poor category, after days of being in the severe category. However, we know that rain also can lead to increase in air pollution, as the moisture traps the pollutants. IMD has informed us, as of tomorrow (November 15th), wind direction will change, speeds will increase as will the ventilation index. This combination may assist in improvement in air quality.

If this happens, then for the moment, the worst of the winter-onset-Diwali-crop burning period (from November 1-15) could be behind us. By mid-November, crop residue burning is expected to stop and already satellite data shows it is greatly reduced. However, this does not mean that air quality could not once again decline in the coming months.

It is now clear that the region's own sources of pollution are greatly responsible for the poor air quality we have seen in the past 15 days. The accumulation of pollutants post-Diwali and then the addition of pollutants on a daily basis combined with adverse weather – onset of cold and no wind for dispersion -- has kept the region in the very poor, severe and even severe plus category. This is extremely hazardous for our health and unacceptable.

We also know that the role of crop burning has been to exacerbate this situation. According to SAFAR, the contribution of crop burning to the region's pollution stress, peaked on November 5th, when it went up to 33 per cent. After that, because of the direction of wind, the contribution has ranged between 5-14 per cent. There is no doubt that these emissions from crop residue burning coming at a time when there was accumulated load and very adverse weather has tipped us over the edge into severe pollution.

But it is also clear that even if we eliminate crop burning in the coming months, weather conditions will only get more adverse. The cold will increase, which will add to inversion and not allow dispersion; moisture will increase, which will trap the pollutants. And in case we have prolonged periods of poor wind and low ventilation index (that measures dispersion) then we could be back again in the severe and severe plus category.

This therefore, requires us to be better prepared for such an episode and this is where the issue of restriction of private cars comes in.

The fact is that this last 12-13 days, based on the CPCB Task Force recommendations, EPCA had directed for closure of all construction activity; all industrial activity (other than based on natural gas); all brick kilns, stone-crushers and hotmix plants. In the days post Diwali, we also asked for truck entry into Delhi to be stopped.

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Central Pollution Control Board

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Tel/Fax: 22301955 (CPCB), Tel: 43102414 Dr. Bhure Lal, Chairman

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These measures were of definite help to reduce the pollution levels. Without these measures, pollution would have been even higher and have even much more impact on human health. The data from SAFAR and particularly its analysis on the reduction of nighttime pollution because of the ban on truck entry shows this trend clearly.

However, it was also clear that we could not have continued to impose these restrictions beyond the 12-13 days. I am acutely aware of the economic woes of the daily labourers, who went without jobs because of the closure of construction and other industrial activities. The Hon'ble Supreme Court has rightly observed in a recent hearing that the poor in our cities suffer the most because of air pollution as their work requires them to do strenuous activity in the polluted air. By bringing in these measures, which were essential to combat the pollution emergency, we had hit them twice as they also lost their sources of livelihoods. It is therefore, clear that we cannot impose these emergency measures as a proxy for our inaction on long-term emission reduction.

The CPCB Task Force was, in my view, right in asking for these restrictions to be lifted, even though we knew that air quality was still not in the better range.

The same is the situation with truck ban. EPCA in its numerous reports to the Hon'ble Supreme Court has maintained that trucks are a major source of pollution in our city. It is for this reason that EPCA had sought for and got the directions on diversion of non-destined traffic; construction of the western and eastern expressways; environment compensation charge as deterrence and now installation of RFID to ensure that the deterrence is effective.

It is also clear that the ban on truck entry into Delhi led to improvement in air quality, but again, it cannot be sustained over the 3-4 nights that we imposed it this time. The number of Delhi-bound trucks at the border increased enormously and the situation could have got out of hand. Furthermore, halted trucks add to congestion and inconvenience of people who live in the nearby cities.

This is why I had written to chief secretaries that we may need to consider steps on private vehicles. This I believe needs to be done so that we have plans, in case the levels spike again. Remember also that we are at best at the very poor category of air quality, which by our own health advisory is bad for prolonged exposure – daily exposure.

Therefore, we have no option but to consider measures that restrict private vehicle:

I say this for the following reasons;

1. Vehicles contribute as much as 40 per cent of the total emission load in Delhi and roughly 30 per cent in the region according to SAFAR emission inventory.
2. Even after removing trucks and other diesel commercial vehicles, which are the highest segment of this pollution load, the remaining vehicles add up to substantial load, particularly private diesel vehicles which contribute substantially to both NO_x and PM emissions.
3. All cities, which have similar emergency plans; like Paris or Beijing, include restrictions on private vehicles, which is done by either number plate or by fuel type/age.

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4. The Hon'ble Supreme Court has directed for vehicle sticker scheme, which would identify vehicles by fuel type/age. But this scheme has still not been implemented by government.

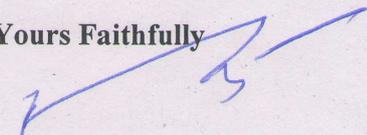
In this situation, the only option is to look at either a complete ban on all private vehicles (without the identification of petrol or diesel), other than CNG and/or restriction on plying by number plate (odd-even). However, please note that the odd-even scheme, as practiced in other cities for similar pollution abatement, is done for extended hours and includes all private vehicles.

I am also aware that any restriction on plying of private vehicles, without adequate public transport creates huge inconvenience to people. It is for this reason that EPCA for the past many years has stressed on the need for augmentation of public transport, not just in Delhi but in the NCR region. The Comprehensive Action Plan, which is now notified, but still nowhere close to implementation, includes timebound action on public transport.

The question then is if actions on these crucial measures like public transport are inadequate, should we also not include emergency measures to restrict private vehicles on the days when pollution episodes peak and in particular when there is a prolonged period of high air pollution?

I would be grateful if the GRAP Task Force can deliberate on this letter carefully and get back to EPCA on your recommendations at the earliest.

Yours Faithfully


(Dr. Bhure Lal)
Chairman, EPCA

To
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