

EPCA comments and recommendations for the consideration of the Hon'ble Supreme Court on the report of the Sub-Committee of the High Level Task Force on prevention of stubble burning in Punjab, Haryana and Western Uttar Pradesh.

This report is being submitted in compliance with the order of the Hon'ble Supreme Court of January 24, 2018.

January 29, 2017

EPCA would like to endorse the overall direction of the report of the Sub-Committee as it recommends that the short and long-term solution to the problem of crop burning is to provide farmers with alternatives and to educate them that stubble burning is not in their best interest. The view that farmers must stop stubble burning as they see benefits to improvement in soil health and crop productivity is important for long-term sustainability as well. Furthermore, it is clear that in-situ management – converting the straw into mulch – is the most environmentally sound option.

EPCA would also like to endorse the strategy to provide easy subsidy at 50-75% so that machineries used for tilling the residue back into the soil are easily available to farmers. It is also important that the sub-committee has decided *against* providing Rs 100 additional in the MSP given to farmers for not burning stubble. This would have become a perverse incentive and should be avoided. The Sub-Committee's suggestion that the Agricultural Costs and Prices Commission can look into providing additional funds for better crop management is a good approach.

EPCA's comments are as follows as additional recommendations:

- 1. To include the crucial issue of health impact of air pollution on the health of farmers and their children in the action plan.** As much as farmers must be provided information about the improvement in soil fertility of mulching, they must also be provided with information about hazardous impact of pollution. This aspect must be included in the suggested in the Information, Education and Communication Strategy (IEC) in the action plan (page 20).

2. **To include clear targets for reduction of crop burning area year-wise so that MoEF&CC (the nodal ministry) and the two state governments of Punjab and Haryana are held accountable and can see results.** It must be emphasized that there is a need for scale and speed to ensure that burning of stubble reduces/stops in the coming winter season. The Sub-Committee's own report shows that over the last some years, since there has been concern about stubble burning, only 0.22% of the area planted in Punjab has adopted machines for mulching. In Haryana, this percentage is even lower (page 9). Therefore, the scale of the transition must be accepted and the action plan must include clear targets for the Nodal Ministry and state governments.
3. **To consider the inclusion of in-situ paddy straw management in the works permitted under MNREGA.** This would help farmers reduce high cost of labour. The Nodal Ministry can consider this possibility and work with the Ministry of Rural Development to make this change for the coming season.
4. **To include in the action plan steps to improve monitoring and enforcement against incidents of crop burning.** While it is clear that punitive actions -- use of Air Act to penalize individual farmers -- has limited use when it comes to large numbers who are defying the law, it is important to strengthen enforcement at the local level. The reduction in the numbers of incidents of crop burning, which is discussed by the Sub-Committee (page 4), is partly because of the pressure brought on farmers to stop. EPCA would suggest that the Nodal Ministry must work with state governments to improve village level monitoring by holding district and sub-district officials accountable.
5. **To include the use of satellite imageries to monitor crop burning and to use this information for enforcement in the action plan.** Satellite monitoring of crop burning is included in the notified Comprehensive Action Plan on Air Pollution Control and must be used effectively by the Nodal ministry.
6. **To ensure that there is continued and ongoing work to expand the options for use of straw, including co-generation for power and others.** While the focus of the Sub-Committee's report is on the immediate and

most cost effective solution, there is a need to continue to explore other options that are feasible in scale and can provide monetary benefits to the farmers for straw. This work should continue so that these other alternatives can also be incentivized. It is not clear, which agency will continue to explore these options and put them into practice.

7. **To examine other long-term solutions, including crop diversification so that farmers have alternatives to water-intensive rice cultivation, because of which the time of crop planting has been delayed.** The Ministry of Agriculture must be asked to continue to work on these solutions and to report regularly on progress.