

# GRAP only kicks in during air pollution emergency. We need anti-pollution measures at other times too

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Graded Response Action Plan (GRAP) is the guiding principle for air pollution management for Delhi and NCR, pioneered by the Central Pollution Control Board (CPCB) and implemented by Environmental Pollution (Prevention & Control) Authority (EPCA). Since so many Indian cities rank among the worst in the world on air pollution, we need to analyse GRAP for its effectiveness.

What do we learn from GRAP's implementation from January 2017 onward? First of all, GRAP kicks in only when pollution is moderate to poor instead of starting when the air is good or satisfactory, perhaps because it is an emergency plan. Since the plan only kicks in at moderate to poor levels, it is indirectly assumed that it is fine to pollute up to that level, which is of course reached as a default! As a result, in 2018 Delhi had 5 good pollution days, 66 moderate, 145 poor, 57 very poor and 92 severe days.

We need, however, to start with zero tolerance for air pollu-

tion and examine any and every activity that disturbs it – just as we exercise and eat well when we are healthy and not wait till we get sick. This is the major change we need to bring in.

For example, when AQI is moderate to poor, GRAP suggests 10 actions: Stop garbage burning and impose fine; enforce regulations on brick kilns; enforce pollution control on power plants; periodic mechanised sweeping on roads with heavy traffic and water sprinkling on unpaved roads; vigilance for visible emissions

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and enforcing pollution under control (PUC) norms; dust control in construction activities; deploy traffic police for smooth traffic flow; enforce Supreme Court order to allow entry of trucks registered only after 2005; enforce ban on firecrackers; water fly ash ponds every two days in summer.

Nearly seven of these



activities already have regulations in place. But the words “strictly enforce” or “ensure regulations”, “increase vigilance” suggest that these are not really meant to be followed in normal conditions. For example, why should garbage be burnt at all even when the air is good? Is the activity forbidden or not? This needs to be clarified. When pollution reaches severe levels, GRAP suggests stopping power plants, brick kilns, etc. Owners suffer losses for stopping and starting, or not operating such plants and industries. Their economic viability is compromised anyway and they may as well start with the right

technology knowing what the rules are and what it will cost.

To encourage investment in alternative technology, it is necessary to insist on the right type of activities from the inception itself at the time of registration. Acting only when there is an emergency has enormous costs and poor results. We need to get used to the idea that clean air is not free if we wish to grow at a rapid scale.

Yes, to be serious about air quality we will also require adequate funds, capable institutions and skilled manpower who operate with a keen sense of their responsibilities. For example, the US Environmental

Protection Agency (USEPA) has more than 15,000 staff and a budget of \$8 billion. CPCB is struggling with 500 persons and \$15 million budget for a much larger population. We should create a separate budget line for air pollution management in every budget; Centre, state, city and even districts and go down more because pollution levels are high almost the year around everywhere.

We can learn now from GRAP implementation in Delhi NCR so far and improve upon it step by step as this process requires “learning by doing”. This could be useful for another 102 cities as well. There are no foolproof solutions and each city would have to identify its own sources and measures.

GRAP could be re-graded by shifting actions two or three steps earlier. Capable staff for monitoring and management could be created by an environmental cadre that is trained and knows what to do in which situation and how to address environmental problems in a holistic manner. Most of all, we need aware and alert citizens willing to follow the rules.

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