Causes for Limitations in the Environmental Clearance Process in Private Development Sector of Maharashtra

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BIOGRAPHY:

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ABSTRACT

For any building construction project in India which is 20,000 square. metres and above a prior Environmental Clearance (EC) from the State Environment Impact Assessment Authority (SEIAA) is mandatory[1]. However, it has been observed that there are some loopholes and shortcomings when it comes to legally file for Environmental Clearance. Issues like delays, transparency of the process, political biases and favouritism, post-project monitoring and evaluation are some of the main concerns. In addition, there are possible concerns with the ease of filing Environmental Clearances like whether the system is user-friendly and up-to-date or not. In tandem with the latest technology and infrastructural advances, it is imperative that the Environmental Clearance filing system must get updated to avoid uncertainty. In this paper, we will be looking at some of these Causes for Limitations in the Environmental Clearance Process in the Private Development Sector of Maharashtra, India.

Primary and Secondary data collection methodology will be used to collect data which will consist of surveys, questionnaires, and data gathered from research papers. This will aid in establishing some of the basic concerns related to the Environmental Clearance process in the country and what are the methodologies proposed to tackle these impediments. In addition to this, Review methodology will be used to track the quality, efficiency, and completeness of the Environmental Clearance procedure. The observations from these methodologies will be analysed further through external and internal parameters. The data will be further checked for skewness and accuracy through the data filtration process. The paper will then gather key findings and interpretations from the data analysis which will be used to find out the main causes for limitations in the Environmental Clearance process. On this basis, the paper will conclude by giving possible suggestions on what measures can be taken to minimize these issues and how to efficiently streamline the entire process.

KEYWORDS

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[1] The EIA Notification, 2006.

HYPOTHESIS:

- There are loopholes in the EC filing system which result in delays/favouritism/other political biases.

- The system lacks transparency and accountability.

AIM:

To Identify Causes for Limitations of the Environmental Clearance Process in Private Developments in India.

OBJECTIVES:

To examine:

- Whether the EC filing system is user-friendly.

- Where the system lacks transparency: Right from submitting the TOR, if the user is able to see on what stage has the EC filing process reached (Scoping, Public hearing stage, etc.) and from whom is it pending to move forward to the next stage.

- Political biases/ favouritism cases and in what region/state are they more prominent.

- Possible solutions already implemented by the Government to tackle the above issues.

- Alternatives/ remedies for resolving major issues with the EC filing process.

SCOPE:

The scope of this research paper is limited to the EC filing process and its challenges faced by private developers in India.

LIMITATIONS:

- Information will be gathered only from specific regions/states of India from case studies/ research papers/ interviews.

- Information will also be taken from states which have filed RTI cases against the EC process.

BACKGROUND STUDY

State Environment Impact Assessment Authority (SEIAAs) is a crucial arm of the Ministry for implementation of EIA Notification at the State level and they can consider and grant environmental clearance (EC) for all proposals under Category B.

The Ministry has taken several initiatives for streamlining the EC process and reduce the delays in grant of clearances, among other factors, complete online submission and processing of EC proposal, standard ToR for all expansion proposals, raising all queries at one go and avoiding multiple EDS/ADS, conducting fortnightly EAC meetings, etc.
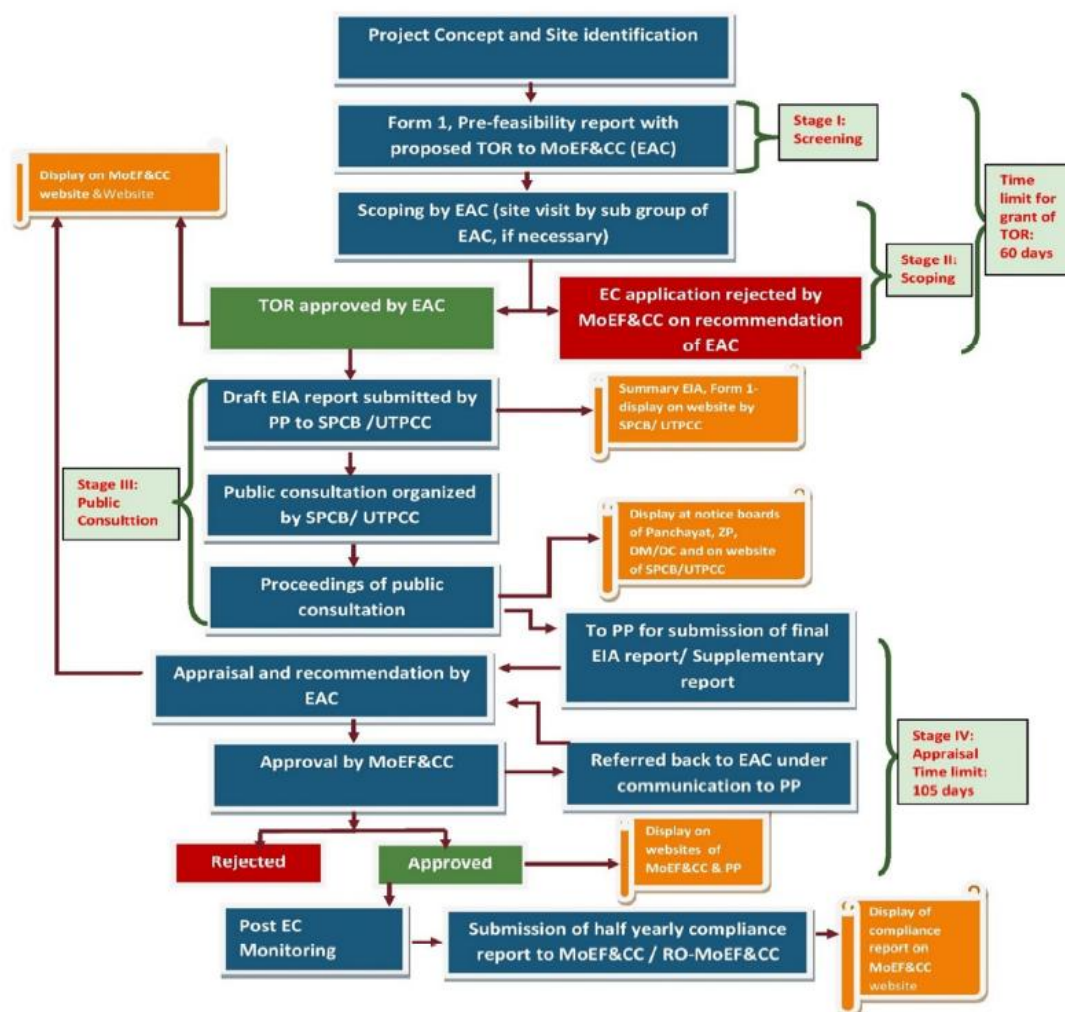
SPCB: State Pollution Control Board, UTPCC: Union Territory Pollution Control Committee, EIA: environment Impact Assessment, PP: Project Proponent, EAC: Expert Appraisal Committee, TOR: Terms of Reference, EC: Environmental Clearance

Figure 1.0 Process of Grant for EC

Process of Grant of EC

The EAC carries out a combination of these standard steps depending on the classification of the project into categories[2]:

- **Screening:** To decide whether the project requires further study for preparing the Environmental Impact Assessment (EIA).

- **Scoping:** Setting clear guidelines that state the environmental issues identified in the project.

- **Public Consultation:** To determine the concerns of the local persons affected by the environmental impacts of the project.

- **Appraisal:** The EAC studies the application, final EIA report, and outcome of the public consultations and makes its recommendations to the MoEF.

The MoEF considers the grant of environmental clearance to development projects in terms of the provisions of EIA Notification, 2006. The project proponent is expected to pay consultants to do the EIA, after getting feedback and receiving the terms of reference (ToR) accepted by the Central or State environmental impact assessment authority. Category A projects come to the Centre and B go to the state, where the state authority then decides if it is B1 (projects requiring detailed assessments) or B2 (that do not require detailed assessments).

The committee will the decide whether to approve the ToR, ask for more information or reject it. Post the ToR, EIA is assessed, which requires the contribution of several functional area experts and management and monitoring plans. The draft EIA is in English and its summary in the regional language, which is then released for public consultation.

A public hearing takes place for listening to local objections, which then is handed over to the appraisal committee, which has to scrutinise the draft, ask for more information, and accept it with conditions or reject it.

However, projects are rarely rejected, the Project Proponents are, in most cases asked to come back with additional data and more clarifications. Ultimately, the committees clear the

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[2] The Gazette of India: Extraordinary, Part 2, Section 3, Subsection (ii), Ministry of Environment, Forest, and Climate Change Notification, February 2020.

project, but keep a fistful of conditions that will never really be monitored. These unidentified people from the committees are hence not held responsible for the project post clearance; their work ends with this clearance.

The monitoring is then left to the understaffed regional offices of MoEF — state pollution control boards are not empowered to monitor impacts as this clearance is done under the EPA- Environmental Protection Act and not under the laws governing air or water. In all this, there is duplication, lack of scrutiny, lack of accountability, and no genuine intent to ensure that projects are implemented keeping in mind environmental interests.

LITERATURE REVIEW

Overview

Throughout the research papers in study, it has been observed that both the Environmental Impact Assessment and Environmental Clearance Process play crucial role in the developing infrastructure and construction industry. However, there are some loopholes and shortcomings when it comes to legally file for any of these processes. In tandem with latest technology and infrastructural advances, it is imperative that the system gets updated to avoid uncertainty.

This review explores the extent of these perceived issues and the methodologies proposed or implemented to tackle them. Through this study, the review comes up with key findings and possible solutions to minimize the problems and streamline the entire process.

Perceived Issues

Some major issues regarding the Environmental Clearance process have been identified:

- **Regional Variations in EIA Follow-up.**
  Variations regarding social, political, economic, etc. standings occur in different regions in India.

- **Lack of Transparency in EC Process.**
  The public is unaware of the causes of delay after the EC is submitted, and don't know exactly when they will get the clearance.

- **Lack of adequate public involvement and the overall "secrecy" about the process.**

The public involvement is superficial and doesn't really go to the deeper roots of the problem. No information is displayed on the website of the phase in which a particular filed EC is at, at a given time.

- **EA teams are not interdisciplinary.**

  The EA teams should be interdisciplinary to get a holistic picture and proper analysis.

- **Results are based on political biases.**

  It has been observed that most of the ECs filed who have political connections get clearances faster than the others.

- **Deadlines not being met.**

  The delays sometimes drag over months and years.

- **Lack of post-project monitoring and evaluation.**

  Post-project monitoring and evaluation is often ignored and/or not given that much importance.

- **Lack of user-friendly technology.**

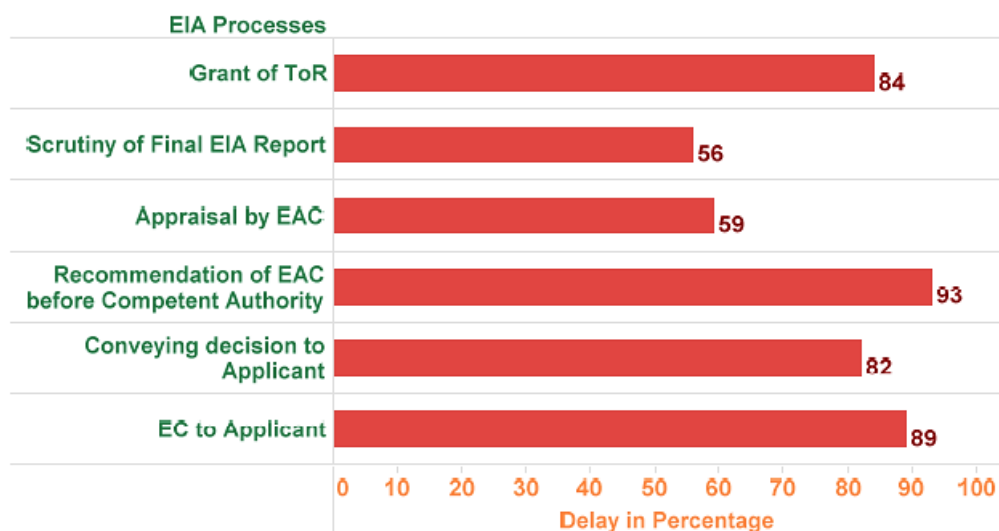 The system to file EC is not user-friendly which proves to be a hindrance to the process.

Figure 2.20 Delay of EIA Processes (in per cent)

Chart 2.2 shows that overall delay in grant of EC to the applicant is in 89 per cent cases. In terms to various EIA processes, maximum delay (93 per cent cases) occurred in giving recommendations of EAC before the Competent Authority whereas the least delay occurred in scrutiny of final EIA Report.

Implementing Methodologies For Assessment

1. Variations in EIA follow-up are identified by using Qualitative and Quantitative methodologies. (Jha-Thakur, U., 2011) Qualitative methodology: Three case studies at three different states in India are carried out by the author. Quantitative methodology: Forty-three interviews amongst the key players in the mining and environmental sector in India are conducted. Both these methodologies help the author understand the best practices in EIA.

2. The use of Review methodology to track the quality, efficiency, and completeness of the EA procedure is seen carried out to resolve issues like public participation, post-project monitoring and evaluation (Valappil et al., 1994).

3. Implementing software like Microsoft Project to track down the status of the project and identify the delays and their causes. (Shrivas, A., 2018).

4. Data collection through semi-structured interviews where a combination of convenience and purposive sampling was used. (Dilay et al., 2019).

5. Mechanisms for the provision of participation (financial aid/ technical knowledge and resources) that would encourage local communities to engage in the decision making process. (Dilay et al., 2019).

6. Robustness checks to examine assumptions by conducting a McCrary density test to assess continuity in three variables of a sample by sorting. (Kopas et al., (2021).

7. To avoid confusions in sorting, an RD (Regression-Discontinuity) Analysis is carried out on a "donut" sample. (Kopas et al., (2021).

Key Findings

- A regulated system needs to be implemented for tracking down Environmental Clearance Process status.

- The EIA teams are should be interdisciplinary, which will help provide a meaningful analysis in the EIA report.

- Transparency should be maintained in the overall process which will help reduce political biases, secrecy, and corruption.

- The system should be made user friendly to increase public participation and lack of dependability on certain sources for filing EC reports.

METHODOLOGY

This paper explores the causes of these perceived issues by using both Primary and Secondary data collection. In Primary data collection, both Qualitative and Quantitative methodologies will be used. Firstly, by conducting interviews and questionnaires amongst key firms from the Private Development Sector in Maharashtra who file for Environmental Clearance. This will help narrow down the causes for limitations. Secondly, case studies in various parts of Maharashtra will be conducted to explore these factors further. This will help to understand whether the problems are consistent throughout Maharashtra or if they differ from region to region in Maharashtra.

From Primary Data Collection following points were gathered:

For Primary Data Collection, 30 architectural and construction firms from Maharashtra were identified to answer the questionnaires. These firms differed in scale (small, medium, and large-scale), frequency of filing for EC, location in Maharashtra (city/suburbs), and new firms versus older ones who have been operating for over 10 years.

There is a vagueness about the entire EC process right from filing, stages of grant of EC, final grant of EC, and post project monitoring. The causes for this differ as per individual cases- in some cases it was observed that there were no delays faced but the system was not easy to use. While in some cases it was observed that there were delays in every step and lack of accountability for the same from the Government.

In Secondary Data Collection, an Exploratory methodology will be carried out by assessing Literature Reviews and Research Papers related to limitations in Environmental Clearance process in India. This will aid in establishing some of the basic concerns related to Environmental Clearance process in the country and what are the methodologies proposed to tackle these impediments. In addition to this, Review methodology will be used to track the quality, efficiency, and completeness of the Environmental Clearance procedure.

From Secondary Data Collection following points were gathered:

The Secondary Data gives a more holistic picture to understand the problem at hand. There are many possible causes for delays right in the state of Maharashtra itself due to lack of education, language barriers, unskilled staff to file and process ECs, delays due to transfer of files from one department to the other, political biases at a higher level- possible inter-connected with other projects or political proponents, are among few of the very many causes.

Emphasis is given to Secondary Data Collections as the sample size for Primary Data is less and cannot gauge the entire condition in the Private Development Sector of Maharashtra.
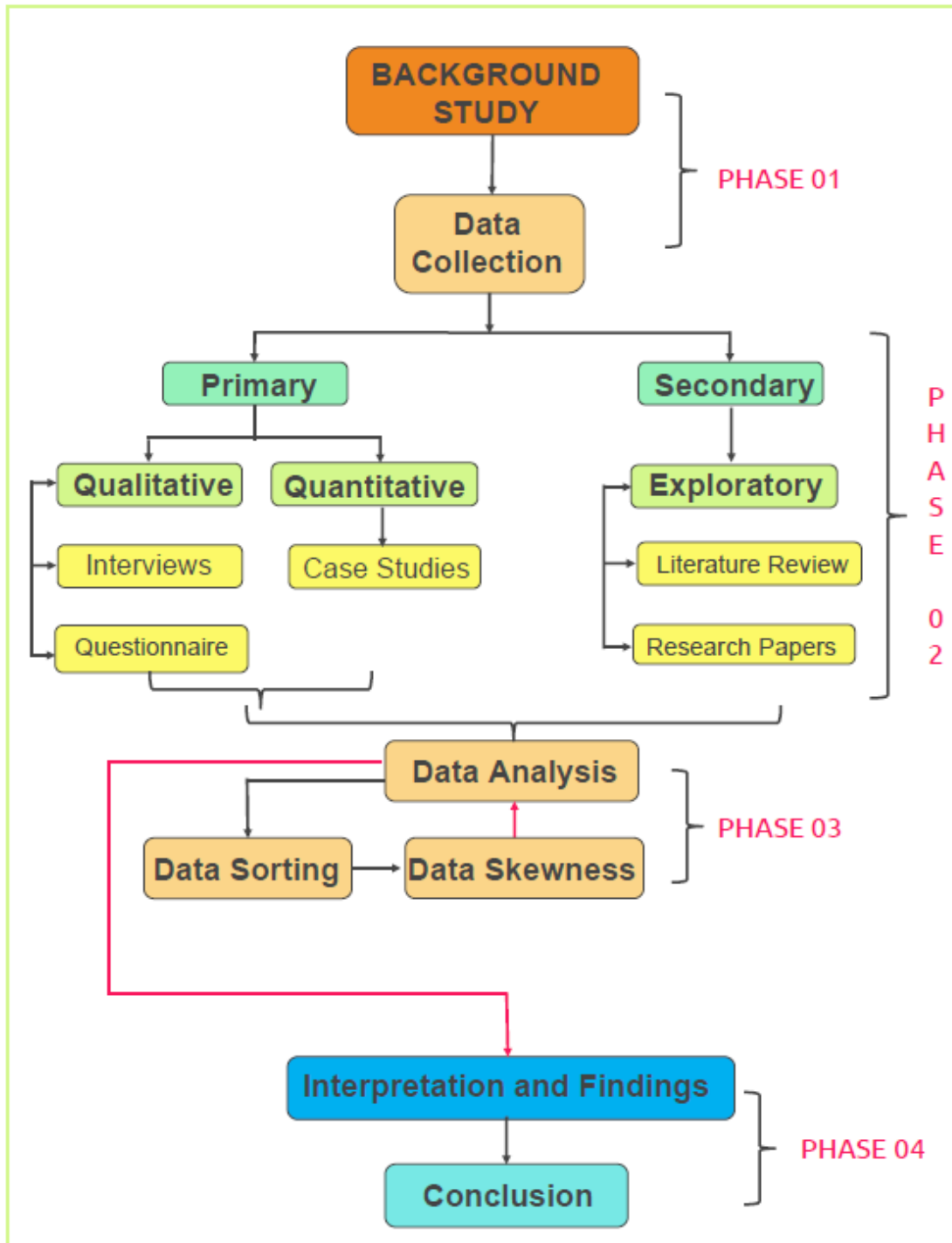
METHODOLOGY FLOWCHART

Figure 3.10 Methodology Flowchart

DATA COLLECTION

Primary Data Collection-From Questionnaires

The following data was gathered from Google Form questionnaires which was circulated to 30 private architectural and construction firms in Maharashtra:

When asked how often the firm applies for Environmental Clearance for projects, majority of the votes-83.3% said that they apply only 6-12 months or over a year.

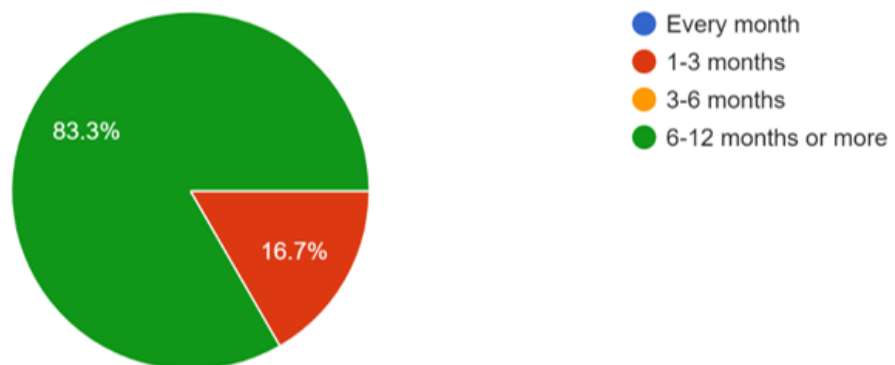1. How often does your firm apply for Environmental Clearance for projects?

Figure 4.10 showing the frequency with which the firm applies for EC

When asked whether the Environmental Clearance application process is smooth, majority of the votes-67.7% answered in the negative.

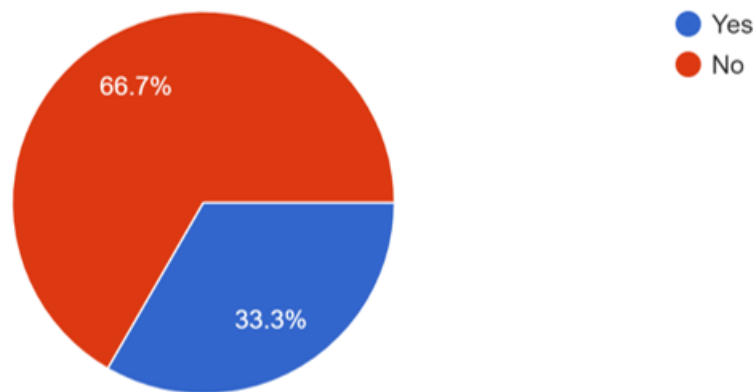## 2. Is the Environmental Clearance application process smooth?

Figure 4.11 showing the ease of EC application process

When asked how long it takes to get Environmental Clearance for projects, majority of the votes-50% answered that it takes about 90-120 days.

3. How long does it take to get Environmental Clearance for projects?
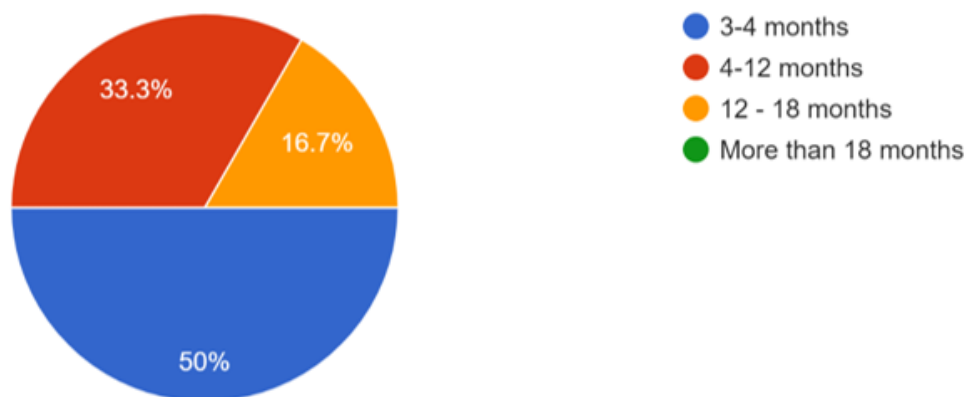

Figure 4.12 showing the duration for the grant of EC

When asked what the limitations of the Environmental Clearance process were, majority - 66.7% answered with Lack of Transparency, the System is not user-friendly, there are delays due to political biases and favoritism.

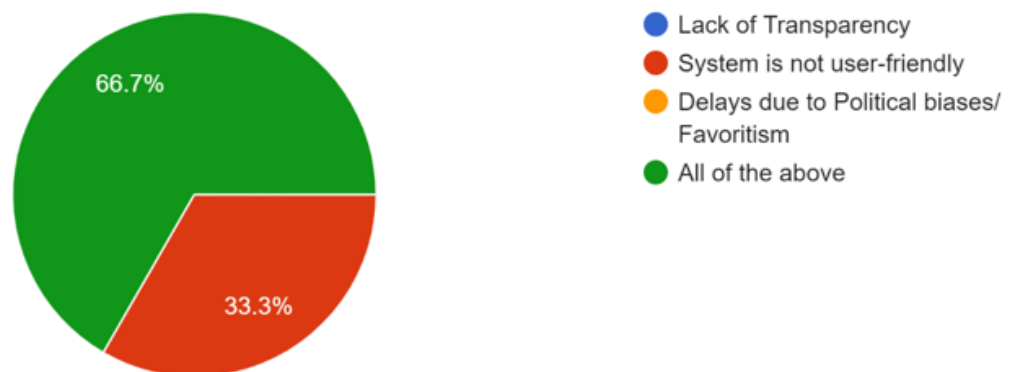4. What are the limitations with the Environmental Clearance process?

● Lack of Transparency
● System is not user-friendly
● Delays due to Political biases/ Favoritism
● All of the above

Figure 4.13 showing the limitations of EC process

When asked whether they have experienced delays/biases/or other issues while filing for Environmental Clearance, there were difference of opinions, 50% said no, 33.33% said yes, and the remaining said that the process guidelines for filing the EC need to be clear.

When asked whether the website is user-friendly and transparent, majority-66.7% said yes.

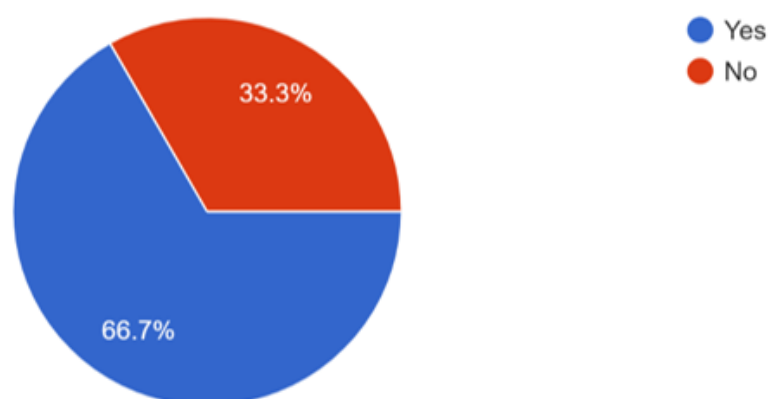6. Is the website user-friendly and transparent?

● Yes
● No

Figure 4.14 showing the user-friendliness and transparency of EC website

When asked about their thoughts regarding the state-wise rating system proposed by the Government of India to maintain transparency and efficiency of EC process, the votes were

split. Half of them agreed that the quality of EIA will be compromised while the other half felt that this was an intermediary step to minimize undue delays in the EC process.

7. What are your thoughts about the state-wise rating system proposed by the Government of India to maintain transparency and efficiency of EC process?

Figure 4.15 showing whether the SEIAA ranking system is good or bad

Secondary Data Collection-Literature Reviews and Research Papers

The SEIAA Ranking System

To tackle the ongoing issues of delays and streamlining the process, a new rating of SEIAAs has been introduced for encouraging the efficiency, transparency and accountability in the SEIAA functioning. The ranking system is based on the requirements of EIA Notification 2006 and various guidelines issued by Ministry. This is designed to encourage efficiency in decision making without diluting or compromising the EC process.

This system has no negative marking for not fulfilling the criteria. In case of queries or additional information in the proposal, the SEIAA body can raise a request for EDS/ADS. The final EIA Report is prepared as per recommended ToRs and project evaluation based on the same. It is therefore a given that the EIA quality will not be compromised due to this system, on the contrary, it would encourage the PP to improve the quality of proposals.

There are seven criteria on which SEIAA's will be ranked. The criterion and their reasoning are explained in detail below:

Table 4.20 showing the criteria and rationale for SEIAA ranking system

Sl.No	Criteria	Rationale
1	Average number of days for granting EC	• The EIA Notification provides a time period of 105 days for granting EC which includes 60 days for appraisal and 45 days for decision by regulatory authority. • This criterion has been introduced to encourage the efficiency of SEIAAs in order to abide the time-line given in EIA Notification. • The SEIAAs which follow the timeline provided in the EIA Notification 2006 are granted 1 mark. Even 0.5 mark being given who will take decision between 105 and 120 days. • Marks are not reduced for SEIAAs which take decision in more than 120 days but an extra mark granted which take decision between 80-105 days. • There is no negative marking proposed for not meeting the criteria.
2	% of disposal of fresh ToR/ ToR amendment proposals awaiting for more than 30 days	• Vide Notification dated 17th February, 2020 the Ministry has notified that all new projects or activities shall be referred to the EAC or SEAC by the Regulatory Authority, as the case may be, within 30 days from the date of application, for recommending the specific ToR in addition to the Standard ToR, deemed necessary. In case, the regulatory authority does not refer the matter to the EAC or SEAC, within 30 days of date of application, sector specific Standard ToR shall be issued, online, on 30th day, by the Regulatory Authority. • This criterion will only reduce undue delay in taking a decision on a ToR proposal. • Again there is no negative marking proposed for not meeting the criteria.
3	% of disposal of fresh EC/ EC amendment proposals awaiting for more than 105 days	• Criteria based on the provision of EIA Notification which provides a time period of 105 days for granting EC. In order the encourage the SEIAAs to meet the timeline this criterion was added. • The SEIAAs continue to have the liberty to raise ADS or reject proposals also in case of deficiency. • There is no negative marking proposed for not meeting the criteria.
4	Percentage of cases wherein more than one time EDS were sought by MS	• This criterion is based on OM dated 18th June 2021 issued by Ministry to streamline the essential details sought by the committees. The OM was issued to maintain consistency while examining the proposals and to avoid irrelevant details being sought. • There is no negative marking proposed for not meeting the criteria.
5	Average number of days taken for accepting the proposals for ToR/EC	• This criterion is to encourage efficient and expeditious scrutiny of the proposal for accepting or raising EDS. • The SEIAAs continue to have the liberty to raise EDS or return the proposals within the given time line. • This will also encourage PPs/consultants to submit complete proposal in order to avoid EDS/ return of proposal. • There is no negative marking proposed for not meeting the criteria.
6	Complaints redressed by SEIAA	• This condition has been included to increase the accountability of the Government agency to the common man. • The complaints which are raised need to be addressed and not ignored. • There is no negative marking proposed for not meeting the criteria.
7	Percentage of cases, out of total cases placed to SEAC, for which site visits were carried out by SEIAA/ SEAC.	• The EIA Notification clearly provides that Appraisal means the detailed scrutiny by the EAC or SEAC of the application and other documents like the Final EIA report, outcome of the public consultations including public hearing proceedings, submitted by the applicant for grant of EC. • Appraisal of projects which are not required to undergo public consultation shall be based on Form1/ 1A, any other relevant validated information available and the site visit wherever the same is considered as necessary by the EAC/ SEAC. • In view of the above, this criterion has been added to discourage unnecessary site visits. However, again there is no negative marking proposed for taking more site visits than prescribed for getting positive marking.

The Delay in Translation of EIA

An official correspondence accessed by an RTI showed that the EIA notification 2020 text was only translated to 3 languages- Marathi, Nepali, and Odia instead of minimum of 22,

which is a standard. The date was later extended by a month but after about 18 months after the first notification, MOEFCC finally made the EIA draft available in 22 languages.

Table 4.21 showing the year wise delay in grant of EC

Year of Grant of EC	Number of projects	Number of projects with delays	Maximum delay (days)	Average delay (days)
2011	61	45	944	86
2012	56	54	588	184
2013	24	23	820	231
2014	25	25	761	316
2015 (upto July)	42	38	1,002	238
Total	208	185		

It is apparent from the above table that in 185 projects (89 per cent) the EC was not granted within the recommended time limit of 105 days. The average delay in grant of EC increased from 86 to 316 days during 2011 to 2014[3].

Table 4.22 showing the sector wise delay in grant of EC

Sector		Grant of ToR	Scrutiny of Final EIA Report	Appraisal of the application by the EAC	Placing recommenda-tions of the EAC before the competent authority for a final decision	Conveying recommenda-tions of EAC and the decision of the MoEF&CC to the applicant	Overall time for grant of EC excluding ToR
Number of cases		180	168	202	207	210	208
		Sector wise delays					
1.	Coal Mining	22	13	32	34	28	34
2.	Industry	30	18	22	34	29	30
3.	Non Coal Mining	26	26	28	33	34	33
4.	Construction	-	14	8	16	15	19
5.	Infrastructure	31	15	18	34	33	31
6.	River Valley and Hydro Electric	5	5	4	6	6	6

Table 4.23 showing the stage wise delay in grant of EC

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[3] Union Government, Process of Grant of Environmental Clearance, Chapter 2, Report 39, 2016.

Stages of EC process	Prescribed time limits in days	Projects where the EC was conveyed to the applicant within the prescribed time limit	Projects with delay of 0-30 days	Projects with delay of 31-90 days	Projects with delay of 91-180 days	Projects with delay of 181-365 days	Projects with delay beyond 365 days
Grant of ToR	60	28	47	60	33	12	0
Scrutiny of Final EIA Report	30	74	37	46	9	1	1
Appraisal of the application by the EAC	60	82	16	37	25	28	14
Placing recommendations of EAC before the Competent Authority	15	14	54	88	38	11	2
Conveying recommendations of EAC and the decision of the MoEF&CC to the applicant	45	37	44	72	36	17	4
Overall time for grant of EC	105	23	12	38	56	47	33

As seen in Tables 4.22 and 4.23, the Sector wise delay ranged between 55-99% and EC was granted in within the time limit on only 23. MOEFCC claims that the reason for delay is transferring the documents from the Central Registry sections to the allocated Impact Assessment section, insufficient skilled task force in the Impact Assessment Division, large volume of projects for grant of EC during 2011-14, delays on part of PPs from whom additional information/clarification was sought and lack of awareness about the impact process among PPs and consultants.

DATA SORTING

Table 5.0 shows key points gathered from Primary and Secondary Data Collection

Primary Data	Secondary Data
● Environment Clearance Application process is not smooth.	● Delays observed throughout all sectors and all stages in granting of EC.
● Limitations with Transparency, User-friendliness of the website, Political biases and favoritisms observed.	● Predicts the SEIAAs ranking system will minimize undue delays and streamline the EC process by providing a healthy competition.

● Mixed reviews of SEIAAs ranking system.	● EIA falls short in terms of translation of notification which results in delays.

DATA ANALYSIS

From the Data Sorting process following points are gathered:

- The EC process is not smooth and efficient.

- There are transparency issues, system is not user friendly, and favouritism is been observed.

- Difference of opinion on the newly implemented SEIAA's ranking system.

- Delays observed throughout all sectors of construction industries.

- Delays observed at all stages of granting of EC due to delays in moving documents, insufficient skilled staff, large influx of projects for EC, and delay to additional clarification from Project Proponents.

Due to the small scale of the sample size for Primary Data Collection, Data Skewness is observed in regard to some of the questions in the questionnaire. For eg. When asked whether the Environmental Clearance application process is smooth, majority of the votes-67.7% answered in the negative. However, when asked whether the website is user-friendly and transparent, majority-66.7% said yes.

INFERENCES

It can be inferred from the above data that the Environmental Clearance process still has ample limitations when it comes to the transparency and efficiency of work. The entire system right from submittal to the grant of EC need to go through a thorough scrutiny while assessing each and every step along the way. In the grant of EC process all the stages-Screening, Scoping, Public Consultation, and Appraisal need to be modified according to the category (A, B, B1, or B2) of projects, and according to the present technological advances.

It is also noteworthy that the interconnectedness of data needs to be maintained and not lost in the process. The data that is filed for EC grant needs to remain intact and not get obliterated on the way.

CONCLUSION

Environmental Impact Assessment (EIA) was founded in 1994, when there very fewer developmental projects in India and the process with its rudimentary procedures remained unchallenged. This changed for the worse after the construction boom in the early 2000s when all types of construction projects were included in the system by categorizing them into either Category A, B, B1, or B2 projects. In hindsight, this step made sense as any kind of construction activity definitely leaves some environmental footprint by adding to the water usage, waste water generation, solid waste, noise and air quality, etc.

Based on the above interpretations and findings it is evident that the Environment Clearance system definitely lacks in some aspects. There is ambiguity in the entire EC filing process all throughout the nation and not restricted to the private development sector in Maharashtra. Right from stage-wise delays in the grant of EC, to delays in sectors- not just the private development sector, but also delays in coal mining, industries, and infrastructural projects.

The problem is that the system was never upgraded to handle the huge volume of building projects. To tackle some of these impediments the SEIAA recently released a rating system as a measure of success and to ensure effective functioning of EC bodies. But this system grossly overlooks the underlying intention of doing the Environmental Clearances in the first place- which is how much environmental degradation will occur due to the project and what are the remedies proposed to mitigate that degradation. Faster rates of clearance do not ensure that proposals are ecologically sound and socially valid.

It can be argued that the SEIAA designed this ranking system to hold the assessment committees accountable and to ensure that projects are not unnecessarily delayed. But in cannot be ignored that environmental interests is the Government's least priority and most of the decisions have some hidden agenda behind them. Ultimately, to solve all the major issues, a hierarchical approach needs to be taken into consideration. Wherein we tackle the problem by dividing it into Immediate Remedies, Intermediary Remedies, and Long-term Remedies.
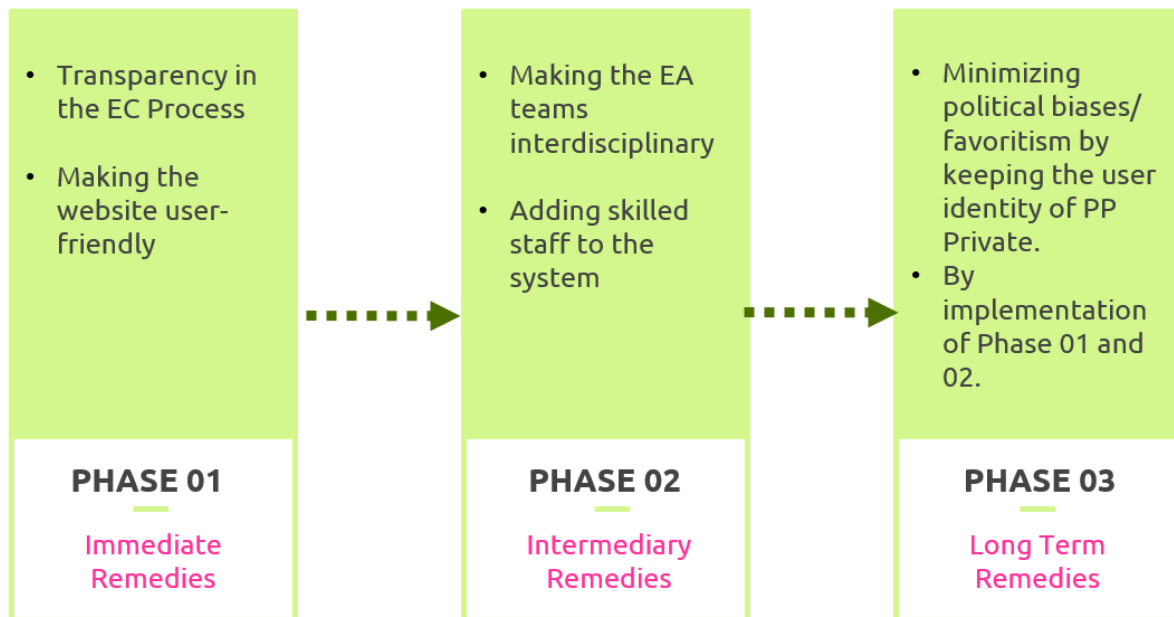
Figure 8.10 showing the different phases that need to be implemented to solve EC issues

Phase 01 (Immediate Remedies):

Delays need to be tackled by making the system more transparent and the website user-friendly informing the PP at what stage their EC grant is at.

Phase 02 (Intermediary Remedies):

The EC grants need to be more holistic, this can be achieved by making the EA teams inter-disciplinary and by adding skilled staff to the system.

Phase 03 (Long term Remedies):

To minimize political biases/favoritism. This process will take time as corruption is deep in our system, but with small changes along the way and the implementation of Phases 01 and 02 it will be easier to tackle this issue in the future.

RECOMMENDATIONS

Based on the above research the following recommendations are suggested:

i. **Modifications to the proposed SEIAA ranking system**

   The current ranking system proposed by SEIAA needs to be modified and not just based on how "quickly" the Environmental Clearance is granted to a project. This will keep the authenticity of the Environmental Clearance.

ii. **Stage-wise delays in the grant of EC need to be kept in check**

The stage-wise delays in the following stages: Grant of ToR, Scrutiny of Final EIA Report, Appraisal, Placing recommendations of EAC, and Conveying recommendations of MOEFCC to the applicant need to be kept in check by assigning durations to each step. If the durations exceeds then some severe actions need to be taken to address the delays.

iii. **Transparency in the Environment Clearance website**

The Environment Clearance website needs to maintain transparency. For e.g. any Project Proponent should be able to check exactly at what stage their filed EC is at and by whom is the approval pending. This small step will ensure in making sure there is no obscurity in the process.

iv. **EA teams should be interdisciplinary and skilled**

The EA teams should be interdisciplinary to get a holistic picture and proper analysis. Skilled staff with technological knowhow and those who know about the EC process should be hired to avoid undue delays and incompetency like data inconsistencies in the final EC draft.

v. **Attempt to minimize political biases**

The entire EC process gets compromised because of political inclinations and favoritisms. This needs to be sorted at grassroots level. Privacy of the PP who files for EC needs to be maintained and the people who are involved in the clearance process need to be scrutinized to avoid corruption.

These steps will ensure a better, well-rounded Environmental Clearance Process which is accessible, efficient, free of any influences and focusing on the environment rather than self-interests.

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ABBREVIATIONS

1. EC: Environmental Clearance
2. EIA: Environmental Impact Assessment
3. TOR: Terms of Reference
4. EDS: Essential Details Sought
5. ADS: Additional Details Sought
6. EPA: Environment Protection Act
7. RTI: Right to Information
8. PP: Project Proponent

LIST OF STATUTORY BODIES

1. SEIAA: State Level Impact Assessment Authority
2. EAC: Expert Appraisal Committees
3. MoEFCC: Ministry of Environment and Forest and Climate Change
4. SPCB: State Pollution Control Board
5. UTPCC: Union Territory Pollution Control Committee