Department of Administrative Reforms and Public Grievances



Ministry of Environment, Forest and Climate Change Grievance Analysis and Systemic Reforms Recommendations 2017

Grievance Analysis and Systemic Reforms Recommendations 2017

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Introduction



1.1 CONTEXT

The Department of Administrative Reforms and Public Grievances (DARPG) received 11,94,931 (related to central government) grievances in 2016 across 88 Ministries/Departments through Centralized Public Grievance Redress and Monitoring System (CPGRAMS). This department's role is to facilitate the pursuit of excellence in governance through improvements in government structures and processes, initiatives and dissemination of best practices. Moving towards this goal, the department commissioned a grievance analysis study of top 20 Ministries/Departments receiving high number of citizen grievances. The study involved identification of top grievance categories and recommending systemic reforms. The Parliamentary Standing Committee for Personnel, Public Grievances and Law & Justice recommended conducting similar study for next 20 Ministries/Departments.

1.2 OBJECTIVE

The study carried by Quality Council of India, as per the mandate given by DAR&PG, was conducted from August 2016 to March 2017, covering more than 100 grievance categories across 20 Ministries/Departments. A team of consultants was deployed to understand issues in depth from the officials and collect information from more than 70 domain experts. Moreover, this team of consultants conceived the methodology, process and outcome of the study. It is hoped that this study will bring the necessary third party evaluation into picture for guiding the schemes and providing useful lessons for similar evaluations on a larger scale in future.

1.3 IDENTIFICATION OF 20 MINISTRIES/DEPARTMENTS

The grievances received on the portal are rich data points. The top 20 Ministries/Departments were covered in the earlier grievance study. This study identifies next 20 Ministries/Departments, based on the number of grievances received by the particular Ministries/Departments (from 01.04.2012 to 31.03.2016.) For the scope of this particular report we will be focusing on the Ministry of Environment, Forest & Climate Change (S.NO 23).

Table 1: List of 20 Grievance Study Ministr

S.No	Ministry/Department	Number of grievances
21	Information and Broadcasting	18,567
22	Financial Services (Insurance Division)	17,840
23	Environment, Forest and Climate Change	17,323
24	Corporate Affairs	17,084
25	Consumer Affairs	16,047
26	Agriculture Cooperation and Farmers Welfare	14,342
27	Electronics & Information Technology	12,729
28	Social Justice and Empowerment	12,637
29	Civil Aviation	12,448
30	Rural Development	11,646
31	Drinking Water and Sanitation	10,723
32	Power	10,392
33	Women and Child Development	9,773
34	Economic Affairs	9,553
35	Commerce	9,509
36	Water Resources, River Development & Ganga Rejuvenation	9,265
37	Food and Public Distribution	8,292
38	Housing and Urban Affairs	7,287
39	Defence Finance	6,604
40	Coal	6,346

1.4 INTRODUCTION TO MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE

The Ministry of Environment, Forest and Climate Change is the nodal agency for planning, promotion, co-ordination and overseeing the implementation of India's environmental and forestry policies and programmes.



11,94,931 grievances were received on PG portal in 2016 across 88 Ministries/Departments **83%** of the grievances were disposed by Ministries/ Departments in 2016

Rank 23 of 88 Ministries/ Departments (based on the number of grievances received from 2012-16) **9,490** complaints were received by Ministry of Environment, Forest & Climate Change in 2015-16

18% of grievances were for Animal Welfare Division

11% of grievances were for division- Pollution Control Board

20% of grievances were on Animal Protection

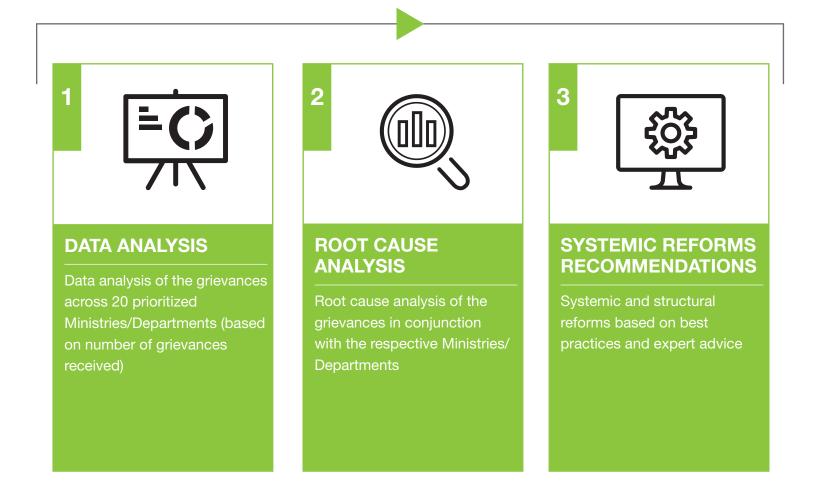
17% of the grievances were on Industrial and Vehicular Pollution

40% of the grievances will be impacted, as and when suggested reforms are incorporated

*The percentage has been computed after multiplying a) Percentage of grievances under shortlisted divisions with, b) Percentage of addressable grievance categories

Deep Dive Grievance Analysis

The three point approach for grievance analysis study includes data analysis, root cause analysis, and systemic reforms recommendations for the service issues.



2.1 DATA ANALYSIS

2.1.1 IDENTIFICATION OF TOP DIVISIONS

The shortlisted divisions were the ones receiving maximum grievances (from 1.4.2015 to 31.3.2016). The highest grievances were received by Animal Welfare division, accounting for 18% of grievances received, followed by Central Pollution Control Board, Hazardous Waste Monitoring Division, National Afforestation and Eco-Development Board, MULTI, Forest Protection Division and Wildlife Division accounting for 11%, 10%, 7%, 6%, 6% and 5% of total grievances received respectively.

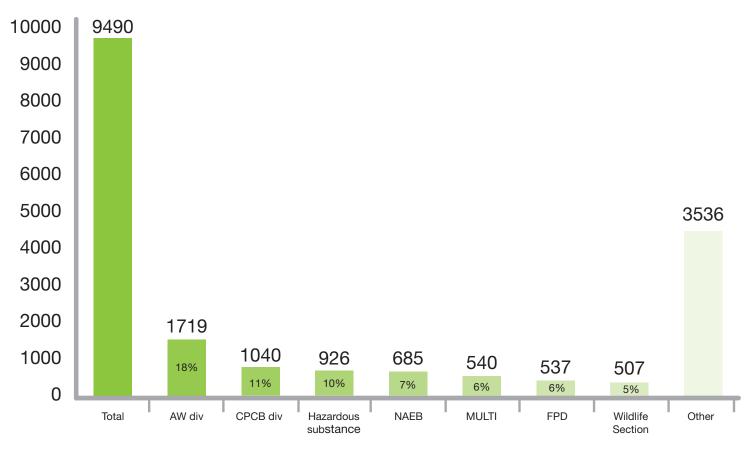


Chart 1: Categorized grievances received by divisions from 1.4.2015 to 31.3.2016

2.1.2 IDENTIFICATION OF FOCUS SERVICE

Grievance data in top 7 divisions was deep dived and 10% of sample was analyzed.

Table 2: Sample size selected for the study

MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE

NUMBER OF GRIEVANCES

TOTAL SAMPLE GRIEVANCES ANALYSED The next step was grievance-by- grievance analysis for a sample of the grievances received by the top 7 Divisions, namely, Animal Welfare division (AW), Central Pollution Control Board (CPCB), Hazardous Waste Monitoring Division, National Afforestation and Eco- Development Board (NAEB), MULTI, Forest Protection Division (FPD) and Wildlife Division. For these seven divisions, recurring issues were categorized.

AN EXAMPLE OF GRIEVANCE ANALYZED IS AS FOLLOWS

"Respected Sir, I am from village DAYADARA BHARUCH district, Gujarat. I had complained to you sir about pollution and release of toxic gases by Villayat GIDC Industries in nearby villages. And I have gotten a good response from your office, and officers have also visited GIDC area. They have also noticed the same and warned the industry. But now again they are releasing harmful gases in environment which is very harmful to humans and animals in nearby villages. So Sir please take any action against these."

ACTION BY MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE

The grievance has been attended and forwarded to Gujarat Pollution Control Board for further necessary action under intimation to the applicant. The grievance may be treated as disposed off.

For the Ministry of Environment, Forest & Climate Change, the top most issue for the Ministry was on cow slaughter and poor facilities for animal protection accounting for 20% of grievances, followed by grievances on industrial and vehicular pollution, accounting for another 17% of the grievances. This was followed by grievances related to Deforestation, Waste management & plastic regulation and Rhino poaching accounting for 13%, 13% and 5%

S.No	D	Grievance Causing Issues	Impact*	Details
1	(1)	Animal Protection	20%	Illegal cow slaughter
	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~			Improper animal shelters and treatment facilities
				<ul> <li>Increase in animal killing due to subsidy and tax benefits provided to slaughter houses</li> </ul>
2		Pollution Control	17%	High industrial discharge and emissions
				High emissions due to burning wastes
				High emissions of vehicles
				<ul> <li>Inefficiency in policy compliance</li> <li>Ex: Pollution Under Control (PUC) certificates</li> </ul>
3		Deforestation	13%	Cutting of trees for road construction and land creation
:224	<b>:</b> **			Illegal cutting of trees for wood and other products
				Poor response from forest department
				Suggestions on tree plantations on roads
4		Waste Management & Plastic Regulation	13%	<ul> <li>Insufficient provision to dispose and recycle different types of waste</li> </ul>
				Burning of waste due to poor disposal mechanism
				Request to ban polythene bags completely
5	42	Rhino Poaching	5%	Alarming rate of Rhino poaching in Assam

#### Table 3: Focus Services identified for Root Cause Analysis

* Grievance Sample Analyzed: 950

## 2.2 ROOT CAUSE ANALYSIS (RCA)

The construction and maintenance of animal shelters falls under the jurisdiction of the state Governments. Essential measures to address grievances pertaining to cow slaughter and Rhino poaching in Assam have already been undertaken by the Government. Hence, the grievance categories pertaining to Animal welfare and Rhino poaching have been deprioritized for further analysis.

The study team spent time with each implementation body within that division to understand core processes, accountability and performance tracking. Domain experts were also consulted to understand root cause for each grievance category.

The questions revolved around policy, process and people problems that were leading to lack of quality implementation.

Issue	Sub-Issue	Root Cause
Industrial Discharge & Emissions	Untreated or partially treated discharge emitted into the air	<ul> <li>Lack of periodic factory equipment inspections to check compliance to pollution standards leading to higher emissions</li> </ul>
	Waste discharged into water streams untreated	<ul> <li>Lack of periodic emission checks leading to discharge of wastes non- compliant with industry standards</li> </ul>
Vehicular Emission	High vehicular emissions especially in metropolitan cities (Delhi)	<ul> <li>Vehicles with emissions non-compliant with Pollution Under Control (PUC) standards being used</li> <li>Inefficiency in Pollution Under Control (PUC) certification process</li> </ul>
Deforestation	Trees being cut for land clearance, wood and other products	<ul> <li>Trees are being cut for land generation in road construction and for wood based products</li> </ul>
Emissions due to burning waste	Solid waste like crop wastes, leaves or household garbage is being burned	<ul> <li>Lack of infrastructure for disposing or recycling wastes</li> <li>Lack of awareness of side effects of burning wastes</li> <li>Lack of implementation of existing laws</li> </ul>
Plastic Waste Management	Reduce usage of plastic	<ul> <li>Request for ban of plastic due to awareness of effects of plastic on health</li> </ul>
	No provision for disposal	Non-degradable plastic calls for lack of disposal facilities

Table 4: Root Cause Analysis of grievances related to Ministry of Environment, Forest and Climate Change

Grievance issues of Air Pollution and Water Pollution are mapped to Air Act and Water Act respectively.

With a vision to achieve sustainable growth with industrialization, the Government of India enacted the Water Act (Prevention and Control of Pollution) 1974, which were guidelines to be followed by industries to treat wastes in order to meet emission standards and launched Monitoring of Indian National Aquatic Resources System and Yamuna Action Plan to monitor pollution and rehabilitate water bodies.

Similarly, Air Act (Prevention and Control of Pollution) 1981, was formulated to set emission standards for the industries and launched programs like National Air Quality Monitoring Program to monitor air pollution.



Chart 2: Policies catering to grievance issues

# 2.3 SYSTEMIC REFORMS RECOMMENDATIONS

Based on the key root cause for improper delivery of service, corresponding recommendations were identified and designed. These recommendations were arrived after discussing with the Ministry/Department representative.

For each issue, the problem was broken into multiple parts to ensure that each aspect of the problem is addressed independently, while ensuring maximum impact. Systemic and structural changes reform recommendations were made for enhancement of Solid Waste management and reduction of pollution across the following areas.

#### AREAS ACROSS WHICH SYSTEMIC REFORMS ARE SUGGESTED



DIGITIZATION

OPERATIONS IMPROVEMENT

POLICY

AWARENESS

MONITORING



# Systemic Reforms



Environmental policies and schemes directly impact each citizen because of the efficacy of the process. Therefore, it is of utmost importance that the process is streamlined, and monitoring is tight knit.

There are areas in terms of policy formulation, implementation where few reforms can bring a major impact. Ten recommendations have been made based on best practices adopted by state governments and other stakeholders.

S. No	Reform Category	Systemic Reforms	Ease of implementation
1	Digitalization	Reduce manual intervention usage in Pollution Under Control (PUC) certification via technology inculcation	Low
2	Operations Improvement	Rank industrial corridors and cities to induce competitiveness and awareness	High
3	Operations Improvement	Empower community to check discharge of industries in their region	High
4	Operations Improvement	<ul> <li>Collaborate with startups in recycling packaging materials like plastic bags, food containers etc.</li> <li>Collaborate with self-help groups/ NGOs to engage community in waste collection, disposal and recycling</li> </ul>	High
5	Operations Improvement	Use plastic in road construction, which increases longevity and decreases cost of construction	Medium
6	Policy	Collaborate with Ministry of Rural Development to make waste collection a part of NREGA	Low
7	Awareness	<ul> <li>Avenues:</li> <li>Collaborate with Drinking Water &amp; Sanitation to leverage Swachta Prerakhs to create awareness</li> <li>Create awareness on Ministry run schemes through digital media, television ads etc.</li> </ul>	Medium
8	Awareness	Mention emission rates mandatorily on the cars to create awareness on environmental impact	Medium

Table 5: Systemic Reforms for Ministry of Environment, Forest & Climate Change

Grievance Analysis and Systemic Reforms Recommendations 2017

9	Monitoring	Rank industrial corridors and cities to induce competitiveness and awareness	High
10	Monitoring	Monitor key performance indicators (KPIs) for waste segregation and disposal at urban local bodies (ULB)	Low



# Case Studies On Reforms



#### 4.1 PLASTIC FREE CITY - SHILLONG



Plastic Roads have been constructed in 9 states of India. The environmentally conscious approach to road construction is a response to the growing problem of plastic litter. Plastic roads not only increase the strength and durability of the roads more than two-fold, it solves the problem of disposal of non-biodegradable plastics. These roads don't develop any potholes, rutting, raveling or edge flaw. There are more than 21,000 miles of all season plastic roads in India. Recently plastic roads where laid in Cantonment area of Shillong as a part of their Plastic Free City movement.

Additionally, citizens have been urged to use jute and leaf based products, instead of plastic for packaging to reduce usage and wastage of plastic and help make their city plastic free.

### 4.2 TAMIL NADU - WASTE MANAGEMENT MODEL



The Tamil Nadu Pollution Control Board has embarked upon an intensive awareness campaign focused on preventing the use of throw away plastics as well as eco - friendly substitutes to plastic items. Billboards educating the people about the ill effects of throwaway plastics were displayed on Metropolitan Transport Corporation buses.

They conducted awareness programs in tourist and pilgrim centers. Training has been imparted to self help groups for production of palm leaf plates, cups across multiple districts to promote cottage industries. Packaging material like carry bags

and containers used for packing food stuff are not made of recycled plastics. Only virgin plastics, permitted additives and colour are to be used in plastic items used for packaging food stuff. Manure from composting solid wastes and plastic wastes are sold to farmers and agencies improving the livelihood of the people.

#### 4.3 COMMUNITY INVOLVEMENT IN WASTE MANAGEMENT - KARNATAKA



In a remote village of Karnataka, in order to protect the water body in the village, the community got together to monitor industrial discharge from the industry. In order to increase transparency, the industry devised a glass channel through which discharge of treated waste into water can be observed. The citizens were given the opportunity to request for a sample test, whenever the necessity was felt. This not only empowered the community but also improved the pollution conditions in the village.

# Conclusion



This Grievance Analysis Study analysed 950 grievances of Ministry of Environment, Forest & Climate Change, spanning across pollution control, solid waste management and deforestation. Following key systemic reforms have been recommended and implementation of these will make an impact in reducing grievances.

#### **KEY RECOMMENDATIONS**

This report evaluates the grievances of Ministry of Environment, Forest & Climate Change and recommends the following priority systemic reforms:

Incorporate third party assessment in industry pollution control processes to increase transparency and improve efficiency
 Monitor pollution standards and efficiency of the schemes through a dashboard indicating industry standards as per indicated timelines
 Setup awareness campaign for information dissemination of Ministry's successfully running programs like Compensatory Afforestation Fund Management and Planning Authority (CAMPA), National Green Tribunal launched by the Ministry
 Revolutionize waste management by adapting best practices to improve the implementation processes

#### LIST OF EXPERTS CONSULTED

Ministry of Environment, Forest and Climate Change	Outside Ministry	Quality Council of India
Anil Sant- Joint Secretary	Ajay Shankar- Ex-Secretary DIPP	• Adil Zainulbhai- Chairman
P.J. Micheal- Deputy Secretary	• Varad Pande- Partner (Dalberg)	Dr. Ravi P. Singh- Secretary General
	Sarat Chandra- Ex- Chairman Pollution Control Board	A.K. Ghose- Principal Advisor, NABET
	<ul> <li>Ishaan Puri- McKinsey India</li> </ul>	

Table 6: List of experts



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