

Thoughts on the Way Forward - CSIR-NEERI Report regarding the draft EIA Notification 2020

CSIR-NEERI's report on '*Collation and Review of the comments/suggestions received from all the stake holders on the draft EIA Notification 2020*' concludes that there are genuine concerns from the stakeholders with respect to the provisions of the draft EIA Notification 2020. This report recommends that the clause-wise comments by the stakeholders along with various recommendations of committees, CAG, judiciary bodies, etc. should be holistically analysed and brainstormed amongst the peer groups, to suitably amend, clarify, detail out, and improve the present draft EIA 2020 notification, for the larger goal of enhanced environmental protection. Manthan appreciates this effort made by CSIR-NEERI. Going forward, we think it is important that the following steps are taken, both, to address the gaps in the process undertaken by NEERI, as well as to ensure a logical follow up of all the comments received.

- The report by CSIR- NEERI has collated the comments which is a daunting task in itself, however the reasons, logic and substantial research that formed the basis of the objections to many provisions of the Draft EIA Notification 2020 is missing from this compilation report. Therefore, MoEF&CC should set up an independent committee headed or chaired by an eminent environmentalist to process and analyse the comments. Report by the committee should be made public. The Committee members should include not only experts representing different areas of environment and ecology but also key representatives of people bearing the brunt of the adverse impacts of projects and activities that impact the environment, as well as representatives of civil society who have been active in taking up issues of environmental impacts and their regulation and governance.
- We also wish to highlight that the comments collated and mentioned in the CSIR-NEERI report pertains only to the provisions mentioned in the draft EIA Notification 2020 which means that comments/objections/suggestions regarding [broader overhauling of the EIA process in the country](#) have been missed. Since there are many such comments reflected in the voices of the civil society organisations (but not limited to), we urge that broader comments are also processed and assimilated in amending the EIA Notification.
- MoEF&CC has been bringing out the parts of the draft EIA Notification as amendments to the EIA Notification 2006. This should stop immediately. Meanwhile some of the most problematic provisions present in the EIA Notification 2006 that militate against environmental protection should be removed immediately through executive action. This should include, but not be limited to amending the Schedule to include projects currently missing.
- Civil Society and media should come together for such continued dissemination of the comments submitted for EIA draft Notification 2020 and the recommendations for the scrapping the Draft 2020 and developing a new framework for EIA/EC in the country

We want to reiterate that draft EIA Notification 2020 is a deeply flawed notification as its provisions are against the basic principles of environmental protection and it weakens an already weak environmental governance regime represented by the existing version of the Notification (2006). Therefore, we join the call by many other environmental groups to REJECT this Notification. At the same time, we also want to share some thoughts on how to go from here. We have highlighted the above-mentioned points as first thoughts to further discuss and formulate the [way forward](#).