



**Report of the
Comptroller and Auditor General of India
on
Social Sector
(Non-Public Sector Undertakings)
for the year ended 31 March 2016**



**Government of National Capital
Territory of Delhi
*Report No. 3 of the year 2016***

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PREFACE

This Report of the Comptroller and Auditor General of India has been prepared for submission to the Lieutenant Governor of the National Capital Territory of Delhi under Section 48 of the Government of National Capital Territory of Delhi Act, 1991 for being laid before the Legislative Assembly of the National Capital Territory of Delhi.

The Report for the year ended 31 March 2016 contains the findings of performance audit and compliance audit of the departments of the Government of National Capital Territory of Delhi under the Social Sector (Non-Public Sector Undertakings).

The cases mentioned in the Report are among those which came to notice in the course of test audit of accounts of the year 2015-16 as well as those which had come to the notice in earlier years but could not be dealt with in previous Reports. Matters relating to the period subsequent to 2015-16 have also been included, wherever necessary.

The audit has been conducted in conformity with the Auditing Standards issued (March 2002) by the Comptroller and Auditor General of India.

Overview

OVERVIEW

This Report contains one performance audit on Prevention and Control of Dengue in the National Capital Territory of Delhi with financial implication of ₹ 53.69 crore and two paragraphs involving ₹ 83.28 crore.

Some of the major findings detailed in the Report are summarized below:

PERFORMANCE AUDIT

Prevention and Control of Dengue in National Capital Territory of Delhi

Delhi has been experiencing outbreaks of dengue since 1967 and various steps had been initiated over the years by the government, municipal corporations and other concerned agencies to prevent and control its occurrence as well as provide medical assistance and relief to afflicted persons. However, dengue continues to occur every year necessitating commitment of significant financial resources to tackle the problem. A performance audit covering the period from January 2013 to December 2015 was conducted to assess whether the steps taken by government agencies and municipal corporations to control dengue were adequate and effective.

Audit observed that despite the recurrence of dengue over the years in the NCT of Delhi and the spike in dengue cases as well as mortalities during 2015, the steps taken by the departments as well as the municipal corporations were not commensurate with the magnitude of the problem though funds were not a constraint. The three municipal corporations (MCsD) of East, North and South as well as New Delhi Municipal Council (NDMC) lacked an effective surveillance mechanism and only 289 out of 967 reporting units (*30 per cent*) reported data of dengue patients to the State Surveillance Unit thereby undermining its objective of meaningful surveillance enabling timely intervention. There was also no institutional mechanism for collaboration or coordination with concerned departments/agencies for solid waste management, proper sanitation and regulation of construction sites, tyre markets, etc. to control mosquito breeding. The Malaria circle, which is the primary unit for anti-mosquito field operations, also lacked basic infrastructural facilities necessary for them to effectively function. Over *67 per cent* of the malaria circles lacked water connections, *22 per cent* lacked electricity connection and *88 per cent* lacked a landline telephone which impaired their ability to effectively carry out their functions.

Further, the institutional arrangement to respond to outbreaks of dengue was weak. The Dengue Task Force constituted to formulate action plans for containment of dengue remained inactive and Rapid Response Teams were not constituted in MCsD, NDMC, Northern Railway and Delhi Cantonment Board

for taking emergency action to interrupt or reduce transmission and eliminate mosquito breeding sites. Out of 67,578 positive dengue cases reported by hospitals, South Delhi Municipal Corporation, as the nodal agency, intimated only 22,436 cases to the Directorate. For the year 2015, while the hospitals reported 409 dengue deaths, the Death Review Committee confirmed only 60 deaths.

Absence of adequate monitoring of spraying and fogging exercises coupled with lack of standard procedures for selection of suitable insecticides and techniques to be adopted undermined the effectiveness of the anti-mosquito operations. MCsD incurred an expenditure of ₹ 109.43 crore on domestic breeding checkers for targeting larvae in houses without any supervision of the work done or an assessment of their effectiveness. Further, expenditure totalling ₹ 42.85 crore was incurred on anti-mosquito operations adopting techniques and chemical formulations that are not prescribed or recommended by either the Directorate of National Vector Borne Disease Control Program or the Program Guidelines for Containment of Chikungunya and Dengue Epidemic Outbreak. In addition, there was no record of usage of insecticides valued at ₹ 79.76 lakh.

The Government of Delhi spent ₹ 10.04 crore on awareness campaigns for prevention of dengue during 2013-14 to 2015-16. However, the advertisements were released between September and November i.e. after the outbreak of dengue which defeated the objective of creating awareness of measures to prevent the outbreak. Similarly, the MCsD also started their public awareness campaigns in October every year after the monsoons.

Compliance Audit

Re-development of Rajiv Gandhi Chowk

Connaught Place (CP) was originally designed in 1929 as a shopping-cum-residential complex. Connaught Place was re-named as Rajiv Gandhi Chowk in the year 1995. Over the years, the ageing process as well as *adhoc* changes and additions to the structure had resulted in deterioration of the overall condition of the heritage complex and defacement of its original façade. Further, development of the underground Palika Bazar and Rajiv Chowk Metro Interchange Terminal inside the inner circle increased footfalls and number of vehicles in CP resulting in traffic congestion and conflict between vehicular and pedestrian on roads. Increase in commercial activities and growing population put additional pressure on the civic infrastructure of CP.

The over-arching objective of the project was to restore the architectural and heritage character of CP while at the same time facilitating and easing traffic

and pedestrian movement to improve the overall ambience and experience of the visitors to this premier commercial centre in the national capital. This objective could not be achieved. The scope of the project as envisaged in the Detailed Project Report was drastically reduced from ₹ 615.20 crore to ₹ 477.02 crore. Restoration of the facade was completed only in the outer and inner circles while study to ascertain the structural stability of the buildings was not carried out. Facilities like subways, escalators, underground parking space and improvement of landscaping and lighting intended to ease both traffic and pedestrian movement and improve visitors' experience were not completed.

Audit also observed that expenditure amounting to ₹ 18.05 crore on utility corridors, surface development, water supply and flooring of corridors was either unfruitful or was avoidable. In addition, the efficacy of augmentation of fire-fighting capabilities done at a cost of ₹ 4.97 crore could not be assured in audit. The turnkey consultant, Engineers India Limited, did not submit the financial implication of change in technology adopted for construction of service tunnel to NDMC for review and decision despite increase in cost from the original ₹ 71.21 crore to ₹ 192.95 crore.

Advertisement and Publicity Campaigns of the Government of the National Capital Territory of Delhi

The Directorate of Information and Publicity (DIP) of the Government of the National Capital Territory of Delhi is responsible for informing and publicising the programs, policies and activities of the Government of the National Capital Territory of Delhi (GNCTD) and looks after the publicity requirements of all its departments.

In May 2015, the Hon'ble Supreme Court approved 'Guidelines on Content Regulation of Government Advertising' with a view to preventing arbitrary use of public funds for advertising without any attendant public interest. Audit test checked the records of DIP as well as that of five other departments and the Delhi Jal Board relating to advertisements released during the period from 1 April 2013 to 31 March 2016 in order to ascertain whether expenditure on publicity and advertisements was being incurred economically, efficiently and effectively in accordance with general principles of financial propriety. The guidelines and principles approved by the apex Court were adopted as the benchmark for assessing and evaluating the expenditure incurred.

GNCTD incurred an expenditure of ₹ 47.74 crore during 2013-14 and ₹ 27.43 crore during 2014-15. During 2015-16, the expenditure incurred was ₹ 101.46 crore including ₹ 20.23 crore paid by DIP in 2016-17 but relating to advertisements of 2015-16. In addition, there was expenditure by other departments and committed liabilities in respect of print and outdoor media during 2015-16 details of which were not provided to Audit.

Advertisements and publicity campaigns funded from the public exchequer should be related to the Government's responsibilities and be explicitly directed at informing the public of the State/Union Territory concerned of the government's policies, programs, services and initiatives. On test check of records, Audit observed that expenditure of ₹ 24.29 crore was incurred on advertisements and publicity campaigns that were not in conformity with the generally accepted principles of financial propriety or the guidelines on content regulation approved by the Hon'ble Supreme Court. Further, over 85 *per cent* of expenditure of ₹ 33.40 crore incurred in one specific publicity campaign pertained to advertisements released outside the NCT of Delhi which was beyond the responsibility of the GNCTD. There was also no prior exercise to identify target audiences or necessary visibility or outreach nor was there any post campaign impact assessment. Audit also noted that while 'Shabdharth' was established with the stated objective of economizing expenditure on advertisements, this was not achieved. Non-adherence to extant instructions relating to inclusion of cost estimates in proposals for release of advertisements/publicity campaigns while seeking approval of the competent authority coupled with improper or non-maintenance of necessary registers undermined expenditure control and provided no assurance as to the comprehensiveness and accuracy of the expenditure incurred and liabilities created on advertisements and publicity.

Chapter I

Performance Audit

CHAPTER I PERFORMANCE AUDIT

Department of Health and Family Welfare

1.1 Prevention and Control of Dengue in National Capital Territory of Delhi

Delhi has been experiencing outbreaks of dengue since 1967 and various steps had been initiated over the years by the government, municipal corporations and other concerned agencies to prevent and control its occurrence as well as provide medical assistance and relief to afflicted persons. However, dengue continues to occur every year with the number of reported dengue cases fluctuating cyclically over the years necessitating commitment of significant financial resources to tackle the problem. A performance audit covering the period January 2013 to December 2015 was conducted to assess whether the steps taken by government agencies and municipal corporations to control dengue were adequate and effective. The Directorate of National Vector Borne Disease Control Program identified eight key elements for prevention and control of dengue. The existing systems and actions taken by the concerned departments/agencies were evaluated against these key elements. The main audit findings are summarized as below:

Highlights

- *The first critical element for dengue prevention is effective surveillance that could provide early warning of impending outbreak. The three municipal corporations (MCsD) of East, North and South as well as New Delhi Municipal Council (NDMC) had neither developed a Standard Operating Procedure for epidemiological and entomological surveillance nor was there any laboratory facility for this purpose. Consequently, epidemiologists and entomologists were not utilized for their primary purpose of evaluating epidemiological and entomological data to assess risks. Moreover, only 289 out of 967 reporting units (30 per cent) reported data of dengue patients to the State Surveillance Unit thereby undermining its objective of meaningful surveillance enabling timely intervention.*

(Paragraphs 1.2.1, 1.2.2 and 1.2.3)

- *Mosquito breeding can be controlled through environment modification that includes solid waste management, proper sanitation and regulation of construction sites, tyre markets, etc. However, no institutional mechanism was in place either in the MCsD or NDMC for collaboration or coordination with other line departments/agencies for environmental modification to control mosquito breeding.*

(Paragraph 1.3.1)

- *The municipal corporations deployed domestic breeding checkers to target larvae in houses within their jurisdictions. While NDMC deployed Anti-Malaria Gangmen who were on their regular staff for the purpose, MCsD engaged 3,358 unskilled persons for the task incurring an expenditure of ₹ 109.43 crore. However, there was no monitoring or supervision of the work done or an assessment of their effectiveness.*

(Paragraph 1.3.2)

- *An expenditure of ₹ 88.26 crore was incurred on procurement of insecticides, diluents and equipment during April 2013 to March 2016 for control of adult mosquitoes. However, in the absence of a definitive policy on use of chemicals and entomological surveillance, there was no system for selecting the most suitable insecticide and techniques to deal with a particular type of situation and identifying localities/ premises where chemicals could be effectively used.*

(Paragraph 1.3)

- *A total of 83.63 lakh houses were treated with six different types of insecticides applying three different techniques. Of these, 72.07 lakh houses (86.17 per cent) were treated adopting techniques/chemical formulations that are not prescribed or recommended by either the Directorate of National Vector Borne Disease Control Program or the Program Guidelines for Containment of Chikungunya and Dengue Epidemic Outbreak. The expenditure incurred on such treatment was ₹ 2.55 crore. There was also no assessment as to the effectiveness of the methods adopted in vector control.*

(Paragraph 1.3.4.1)

- *Outdoor space fogging is generally recommended only in emergency situations to suppress an ongoing epidemic or to prevent an incipient one. It is ineffective in most normal conditions. However, MCsD and NDMC undertook outdoor fogging during 2013-2015 as a routine exercise at a cost of ₹ 95.10 lakh. No study was carried out to ascertain the efficacy of the exercise.*

(Paragraph 1.3.4.2)

- *The formulations used or methods adopted by MCsD and NDMC for chemical control of larvae were not in accordance with those recommended in the guidelines. The Corporations used an insecticide in flowing drains and at a frequency which was not envisaged in the guidelines. The expenditure incurred was ₹ 37.26 crore. In addition, there was no record of usage of insecticides valued at ₹ 79.76 lakh while larvicide valued at ₹ 2.09 crore was used in circumstances that could have been better dealt with by simply mandating regular cleaning of containers in which water was liable to collect.*

(Paragraph 1.3.5)

- *The Delhi Cantonment Board could not utilize 74 per cent of funds totalling ₹ 1.80 crore allocated for anti-mosquito operations during 2013-14 to 2015-16. No action plan was prepared for fogging and spraying of areas under its jurisdiction nor was there any record of any work actually done.*

(Paragraph 1.3.10)

- *The institutional arrangements to respond to outbreaks of dengue were weak. The Dengue Task Force constituted to formulate action plans for containment of dengue remained inactive. There was no mechanism in place for reporting outbreaks of dengue and Rapid Response Teams were not constituted in MCsD, NDMC, Northern Railway and Delhi Cantonment Board for taking emergency action to interrupt or reduce transmission and eliminate mosquito breeding sites.*

(Paragraphs 1.4.1, 1.4.2 and 1.4.3)

- *A Dengue Death Review Committee was to be constituted to carry out medical audit of all dengue cases and guidelines were to be developed by the Directorate of the National Vector Borne Disease Control Program for the Committee. No such guidelines were developed. Out of 67,578 positive dengue cases reported by hospitals, South Delhi Municipal Corporation, as the nodal agency, intimated only 22,436 cases to the Directorate. For the year 2015, while hospitals reported 409 dengue deaths, the Death Review Committee confirmed only 60 deaths.*

(Paragraph 1.5.2)

- *A Malaria circle is the primary unit from where all field operations are carried out. Over 67 per cent of the Malaria circles lacked basic infrastructure facilities like water connections while 22 per cent lacked electricity connection and 88 per cent lacked a landline telephone which impaired their ability to effectively carry out their functions. About 26 per cent and 65 per cent of available pumps/machines were not functional in MCsD and NDMC respectively.*

(Paragraphs 1.7.2 and 1.7.3)

- *The Government of Delhi spent ₹ 10.04 crore on awareness campaigns for prevention of dengue during 2013-14 to 2015-16. However, the advertisements were released between September and November i.e. after the outbreak of dengue which defeated the objective of creating awareness of measures to prevent the outbreak. Similarly, the MCsD also started their public awareness campaigns in October every year after the monsoons.*

(Paragraph 1.8.2)

1.1.1 Introduction

Dengue fever is a mosquito-borne viral disease transmitted through the bite of the female *Aedes (Ae)* mosquito viz. *Ae Aegypti*, which in its severe form of Dengue Hemorrhagic Fever (DHF) can be life threatening. The first three stages in the life cycle of the *Ae Aegypti* (egg, larvae and pupa) are largely aquatic and typically last for seven to 14 days depending upon ambient temperature and humidity. *Ae Aegyptus* breeds almost entirely in domestic areas around man-made water receptacles. An upsurge in the cases of dengue fever/DHF is generally observed during the months of July to November every year. The World Health Organization (WHO) had identified dengue as one of the 17 neglected tropical diseases in its first report on ‘Neglected Tropical Diseases (2010).’

DHF outbreaks have been reported in Delhi since 1967 with a major outbreak in 1996. The number of reported dengue cases and deaths in Delhi during the period 2006-15 has fluctuated with an upsurge during 2015 as depicted in **Table 1.1.1** below:

Table 1.1.1: Reported Cases of Dengue and Dengue Deaths

Year	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Dengue cases	3,366	548	1,312	1,153	6,259	1,131	2,093	5,574	995	15,867
Dengue Deaths	33	1	2	3	8	8	4	6	3	60

The Government of India’s (GoI) National Malaria Control Program, which was started in 1953, was re-organized in 2004 (10th Plan Period) as the National Vector Borne Disease Control Program (NVBDCP) to include dengue and other vector borne diseases¹. The program is implemented through the Directorate of National Vector Borne Disease Control Program (the Directorate) as a centrally sponsored State program to be implemented by the States/Union Territories through their respective Health Departments. In 2007, the Directorate issued Program Guidelines for Containment of Chikungunya and Dengue Epidemic Outbreak (Program Guidelines) and also a Long Term Action Plan for prevention and control of Dengue and Chikungunya. A Mid-Term Plan for prevention and control of Dengue and Chikungunya (MTP) was formulated in 2011. These plans are largely based on WHO Guidelines for Diagnosis, Treatment, Prevention and Control of Dengue Fever (WHO guidelines). The Directorate also published Guidelines in 2009 for Integrated Vector Management (IVM guidelines) for control of dengue/DHF.

¹ Japanese Encephalitis (JE), Malaria, Chikungunya, Kala-Azar and Lymphatic Filariasis.

In the National Capital Territory of Delhi, this program is implemented by the Department of Health and Family Welfare of the Government of Delhi (DHFW) and five local bodies². There is a State Program Officer (SPO) in DHFW to implement this program. The Municipal Corporations in Delhi (MCsD) implement the program in their respective jurisdictions through their respective Malaria Department which is a wing of their Public Health Department (PHD) headed by the Municipal Health Officer (MHO). In addition, the Ministry of Railways and the Delhi Cantonment Board also undertake measures to control mosquito population in the areas within its jurisdiction.

Keeping in view the upsurge in dengue cases and higher mortality rate over the years as brought out in Table 1.1.1 above, a performance audit was conducted to appraise the effectiveness of the existing institutional mechanisms to prevent and control outbreak of dengue in the National Capital Territory of Delhi.

1.1.2 Audit objectives

The broad audit objectives of the performance audit were to assess whether:

- preventive steps taken by the GNCTD and local bodies to control occurrence of dengue were effective, in consonance with guidelines issued by the Directorate of National Vector Borne Disease Control Program (DNVBDCP) and commensurate with the magnitude of the problem in NCT of Delhi; and
- Sentinel Surveillance Hospitals (SSHs) were adequately prepared to handle the numbers of dengue patients and whether they adhered to the directives issued by the Government of NCT Delhi (GNCTD) in this regard.

1.1.3 Audit scope and methodology

The performance audit covering the period from January 2013 to December 2015 was conducted from 15 October 2015 to 22 April 2016. Out of a total of 33 Sentinel Surveillance Hospitals (SSH) in NCT of Delhi, Audit selected 10 hospitals³ of GNCTD and one of East DMC⁴ through random sampling for scrutiny of records. In addition, records of two hospitals⁵ of the Union Ministry of Health & Family Welfare were examined by the office of the Director General of Audit (Central Expenditure). Two hospitals⁶ of the Ministry of

² North MCD, South MCD, East MCD, NDMC and Delhi Cantonment Board.

³ 10 of GNCTD – Lok Nayak Hospital (LNH), Guru Teg Bahadur Hospital (GTBH), Baba Saheb Ambedkar Hospital (BSAH), Deen Dayal Upadhyay Hospital (DDUH), Satyawadi Raja Harish Chand Hospital (SRHCH), Bhagwan Mahavir Hospital (BMH), Dr. Hedgewar Arogyan Sansthan (DHAS), Jag Parvesh Chandra Hospital (JPCH), Sardar Vallabh Bhai Patel Hospital (SVBPH), Pt. Madan Mohan Malviya Hospital (PMMMH).

⁴ Swami Dayanand Hospital (SDH).

⁵ Lady Hardinge Hospital and Dr. Ram Manohar Lohia Hospital.

⁶ Base Hospital and RR Hospital.

Defence along with the Cantonment General Hospital and one hospital⁷ of Northern Railway were also audited by the office of the Director General of Audit (Defence Services) and the Director General of Audit (Northern Railway) respectively. Relevant records were also examined at the Directorate of Health Services of GNCTD and the Public Health Departments of NDMC, Delhi Cantonment Board (DCB), Northern Railway and respective MCsD.

Entry conferences were held with the Director Health Services and GNCTD hospitals on 20 November 2015 and with North DMC, South DMC and East DMC on 19 November, 20 November and 4 December 2015 respectively wherein the audit objectives and methodology were explained and discussed. The exit conference with these organizations was held on 2 June 2016 to discuss the audit findings. The views expressed in the exit conference and received subsequently have been suitably incorporated in the Report.

1.1.4 Financial outlay and expenditure

Municipal Corporations of Delhi: Funds for non-plan expenditure are arranged by the Corporations from their own budget while expenditure on plan activities for mosquito control such as procurement of insecticides, equipment, salary of Domestic Breeding Checkers (DBCs), expenditure on public awareness campaigns, etc. is met out of grants-in-aid received from GNCTD. Details of grants-in-aid released by GNCTD and actual expenditure by MCsD on plan activities during 2013-15 are given in **Table 1.1.2**.

Table 1.1.2: Allocation and expenditure (MCsD)

(₹ in lakh)

Year	North DMC		South DMC		East DMC	
	Grants-in-Aid	Expenditure	Grants-in-Aid	Expenditure	Grants-in-Aid	Expenditure
2013-14	3,663.61	3,266.95	3,018.31	2,574.66	1,200.00	1,145.75
2014-15	4,118.66	3,398.54	3,285.65	2,926.17	1,639.25	2,187.91
2015-16	4,642.12	3,923.53	3,515.48	3,316.50	1,688.00	1,654.94
Total	12,424.39	10,589.02	9,819.44	8,817.33	4,527.25	4,988.60

New Delhi Municipal Council: Funds for non-plan as well as plan activities are arranged by NDMC from their own resources. During the period from April 2013 to March 2016, NDMC incurred an expenditure of ₹ 3.81 crore on plan activities.

Delhi Cantonment Board: Details of allocation of funds and expenditure incurred during April 2013 to March 2016 on anti-mosquito operations out

⁷ Northern Railway Central Hospital.

of funds arranged by DCB from their own resources are in **Table 1.1.3** as under:

Table 1.1.3: Allocation and expenditure (DCB)

Year	Budget	Expenditure	₹ in lakh)
2013-14	58.58	8.91	
2014-15	35.95	4.63	
2015-16	85.98	33.96	
Total	180.50	47.50	

Northern Railway: No separate budget allocation was made by Northern Railway for the Chief Health Inspector for anti-mosquito operations. Funds were arranged out of the budget allocation for the Medical Department of Northern Railway.

Audit findings

The Mid-Term Plan (MTP) issued by the Directorate NVBDCP in 2011 stipulates eight key elements⁸ for prevention and control of dengue. Audit examined the existing systems in GNCTD, MCsD and NDMC against these key elements and observed inadequacies in program implementation as brought out in the succeeding paragraphs.

1.2 Surveillance

Surveillance is a critical component of dengue prevention and control and requires an active laboratory that can provide early warning of impending epidemic transmission and facilitate civic authorities in deciding appropriate timings for intervention. MTP defines two types of surveillance i.e. epidemiological surveillance and entomological surveillance.

1.2.1. Absence of early warning system for impending disease

Epidemiological surveillance or disease surveillance is ongoing systematic collection, recording, analysis, interpretation and dissemination of data of a disease so that action may be taken to prevent or control it. Audit observed that:

- there was no Standard Operating Procedure (SOP) for epidemiological surveillance and there was no laboratory facility in North and East MCsD and NDMC. In South DMC, a laboratory existed but it was not operational; and
- MCsD had failed to not only collect disease data through epidemiologists for epidemiological analysis but also to utilize critical data of confirmed

⁸ Surveillance, Vector management, Capacity building, Monitoring and supervision, Outbreak response, Inter-sectoral co-ordination, Behavior change communication and Case management.

dengue cases provided by hospitals for forecasting the disease, assessing the actual disease burden and planning their anti-dengue activities.

Thus, there was no institutional mechanism to promulgate early warning of impending disease.

South DMC stated (May 2016) that entomologists regularly kept surveillance on relevant vectors while North DMC asserted that epidemiologist surveillance was being carried out for suspected and confirmed dengue cases. East DMC stated that there was no need for epidemiological surveillance as it had very limited terrain. The replies are not tenable as (i) epidemiological surveillance relates to dengue patients/epidemic which is to be carried out by epidemiologists (study of transmission and control of epidemic diseases) and not by entomologists (study of insects), (ii) North DMC merely collected the data of houses treated with chemicals which cannot be deemed as epidemiological surveillance, and (iii) the response of East DMC ignores the fact that the need for surveillance is not related to the size of the terrain but its vulnerability to conditions conducive to vector breeding.

1.2.2 Lack of mechanism required for control of mosquito population

Entomological surveillance is used for operational research purposes to determine changes in geographical distribution of vectors for monitoring and evaluating control programs, obtaining relative measurements of the vector population over time and facilitating appropriate and timely interventions. The entomological parameters prescribed by the MTP-2011 include vector surveillance⁹ and larval surveillance¹⁰.

After the dengue epidemic in 1996, Government of India (GoI) decided in March 1997 to establish Entomology Units in each of the 12 zones of MCsD and appoint one entomologist in each of the zones. Subsequently, eight entomologists were appointed in July 1997 on contract basis. As of December 2015, there were 11 entomologists to organize vector surveillance, ensure the efficacy of insecticide, check the parasite susceptibility of vector and to build up the Department of Entomology.

However, since the entomology units and entomological laboratories were not established nor were standard operating procedures for functioning of entomologists developed, the appointed entomologists were deployed on other tasks such as checking different premises for domestic breeding. In the absence of an entomological surveillance system, MCsD and NDMC were not in a position to assess changes in geographic distribution of vectors and severity of

⁹ Vector surveillance determines adult mosquito density and an index is calculated for each vector species. It includes determining per man hour density and per room density of mosquitoes.

¹⁰ Larval surveillance is used to determine the density of larvae. Houses are the basic sampling units which are systematically searched for water holding containers.

an outbreak in a particular area and initiate appropriate and timely institutional intervention to control mosquito population and intensify public awareness.

While North and South DMCs stated (May 2016) that there was a beat wise daily schedule for checking breeding, East DMC and North DMC stated that laboratory facilities were being set up.

1.2.3 Incomplete Integrated Disease Surveillance Program

GNCTD decided to collect data relating to dengue in its Integrated Disease Surveillance Program (IDSP) portal for disease surveillance. However, out of 967 reporting units (933 private hospitals/nursing homes and 34 government hospitals), only 289 units (*30 per cent*) reported the data of dengue patients to the State Surveillance Unit, set up under IDSP, during the year 2015. The State Program Officer (SPO) made no efforts to collect data from the remaining units. The Department informed that the State Surveillance Unit evaluated the effectiveness of prevention and control program by examining the data. However, no documentary evidence was provided to audit in this regard. In the absence of complete data from all the reporting units and non-availability of trained manpower, the objective of meaningful and effective surveillance like timely detection of epidemics, monitoring trends in spread of dengue and measuring the burden of disease was not achieved.

1.2.4 No vector surveillance even in hospital premises

Each selected hospital vouched to become zero tolerance zone by enhancing sanitation and vector surveillance activities within their premises. However, the Directorate inspected hospitals during July and August 2015 and found larvae of dengue mosquito in their premises. None of the hospitals furnished report of the inspection and action taken thereon. Though in a meeting held in August 2015, Secretary, GNCTD directed for constitution of Dengue Surveillance Committee in each hospital to check the mosquito breeding, yet report of these committees were not submitted to higher authorities.

1.2.5 No arrangement for operational research

The Long Term Plan 2007 and WHO guidelines stipulate that operational research should be oriented to the priority needs of the program in order to generate evidence base for adaptation of strategies and interventions. This may include studies on the ecology of the vector, the efficacy, effectiveness and cost-effectiveness of existing and new vector control methods, formative research on relevant cultural practices and guidance for engaging communities in program activities. Action plans of MCsD 2013 for prevention and control of vector borne diseases envisaged that operational research projects would be initiated in collaboration with the National Institute of Malaria Research (NIMR), the National Centre for Disease Control (NCDC), NVBDCP, medical colleges and non-governmental organisations. However, no initiative was taken by the MCsD in this direction and there was no arrangement for studies on

local ecology of vector and the efficacy, effectiveness and cost-effectiveness of existing vector control methods in order to generate an evidence base for adaptation of strategies and interventions.

MCsD stated (May 2016) that operational research was the domain of central government research institutes. The reply is not tenable since it was the responsibility of the MCsD as per their own Action Plans to initiate operational research in collaboration with central government research institutes.

1.3 Vector Management

According to WHO guidelines, prevention or reduction of dengue virus transmission was dependent entirely on control of mosquito vectors and interruption of human-vector contact. Actions to control transmission should target *Ae Aegypti* in its habitats in households and other settings where human-vector contact occurs. The importance of such measures was illustrated when MCsD failed to carry out its annual exercise of spraying adulticide in all school buildings, community centers, public halls, underground parking sites, JJ clusters, river belts, etc. during the year 2015 and the number of dengue cases spiked to 15,867 with 60 mortalities.

The main emphasis of a vector management program should be on control of mosquito population through (i) source reduction by way of environment modification and manipulation, (ii) chemical control for larval and adult control and (iii) legislation for effective enforcement.

MCsD and NDMC incurred an expenditure of ₹ 88.26 crore on procurement of insecticides, diluents and equipment during April 2013 to March 2016. Of this, insecticides valued at ₹ 43.65 crore were used for fogging and spraying operations during the same period.

1.3.1 Source reduction through outdoor environmental modification

As per WHO guidelines, *Ae Aegypti* uses a wide range of larvae habitats, both man-made and natural. Control efforts should target the habitats that are most productive and epidemiologically important. MCsD and NDMC identified the following primary causes creating conditions suitable for mosquito breeding:

- (i) Inadequate solid waste management particularly of discarded containers such as plastic glasses, packing containers, etc. in which rain water collects providing favourable conditions for mosquito breeding.
- (ii) Poor sanitation conditions and absence of adequate drainage systems resulting in water stagnation that becomes prominent breeding sites.
- (iii) Unregulated construction sites that provide favourable conditions for mosquitoes breeding in water storage tanks, buckets, rubbish bins, pits and other cavities.

- (iv) Un-sheltered used tyre storage sites and workshops in different parts of the city that are highly productive larval habitats.
- (v) Irregular or no piped water supply which compel households to store water in containers/tanks that are suitable sites for mosquito breeding.

Mosquito breeding can be controlled through environment modification. Issues relating to solid waste management, adequate sanitation arrangements, proper regulation of construction sites and tyre markets are the subject matter of MCsD and NDMC which need to be addressed through a well-knit collaboration among their own wings such as the Department of Environment Management and Sanitation and the Building and Health Departments. Matters relating to regular piped water supply can be taken up with Delhi Jal Board. However, no institutional mechanism was in place either in MCsD or NDMC to ensure necessary collaboration amongst their wings and other line departments of GNCTD for environmental modification to control mosquito breeding.

South and East DMC stated (May 2016) that inter-sectoral co-ordination meetings were held involving their own wings and other line departments for environmental modifications. North DMC stated that efforts were being made for sensitization of all stake holders. However, the fact remained that the efforts made so far has had little perceptible impact.

1.3.2 Monitoring of domestic breeding checkers

Ae Aegypti mosquito normally breeds in domestic/peri domestic conditions. Water storage vessels, flower vases, potted plants with saucers, blocked roof gutters, discarded buckets and used tyres are prominent breeding sites inside a house.

While Northern Railway had a robust system for checking mosquito breeding by Domestic Breeding Checkers (DBCs) and monitoring and supervision of the activities of DBCs by supervisory staff of its Health department, there were many inadequacies in the system followed by the MCsD. The Municipal Corporations contracted unskilled persons as Domestic Breeding Checkers (DBCs) who were to target larvae in their habitat by visiting every house. As of December 2015, MCsD had 3,358 DBCs in their 12 zones covering 67.36 lakh houses and incurred an expenditure of ₹ 109.43 crore for the period from April 2013 to March 2016. NDMC gets the checking of domestic breeding done through Anti-Malaria Gangmen (AMG) who are part of their regular staff. MCsD and NDMC fixed a norm for DBCs/AMGs to visit at least 50 houses per day for checking each and every water holding container including overhead water tanks and carrying out anti-larvae measures.

Audit observed as follows:

- Incubation period of a mosquito egg is at least seven days. Going by the norm set by MCsD and NDMC, there was a requirement of 22,453 DBCs to visit all the houses in NCT of Delhi at an interval of six days. Given the existing number of DBCs, it is not possible for a DBC to revisit a house before 44 days.
- In case a house owner denies entry to his house or a house is found locked for any reason, DBC/AMG would leave the premises unchecked for mosquito breeding. Thus, there remains a possibility of gaps in detection of dengue in that locality.
- Domestic breeding checking requires regular combing of the locality with comprehensive mapping and indexing of houses. But no systematic data was maintained by MCsD and NDMC. In the absence of such data, it may not be possible to systematically undertake anti-larval activities in a locality.
- There is no system to supervise and monitor the work of DBCs or to collect feedback from the households on the work actually done by DBCs.
- MCsD and NDMC had never evaluated the effectiveness of DBCs/AMG in controlling indoor mosquito breeding and there was no feedback as to their work from the targeted areas.

Inadequate number of DBCs coupled with lack of any systematic mapping and monitoring of the actual checking done by them provides no assurance as to the effectiveness of their checking and eliminating mosquito breeding in domestic houses. It was further noted that though the necessity of DBCs is only for six months i.e. from June to November, the MCsD hired them for the whole year.

Accepting the facts, MCsD stated (May 2016) that the role and responsibilities of DBCs would be enhanced.

1.3.3 Use of insecticides without ascertaining their susceptibility

The WHO guidelines state that insecticide resistance must be considered as a potentially serious threat to effective dengue vector control. The initial and continued susceptibility of vector to specific insecticides is of fundamental importance for the success of larviciding or adulticiding operations. The Manual for Malaria Technical Supervisors and IVM of NVBDCP stipulate that the choice of insecticides must be based on susceptibility testing which should be carried out every second year in one locality. Though MCsD and NDMC had been relying on chemicals to control the mosquito population, the chemicals used were never tested for susceptibility to ensure their continued efficacy.

East DMC stated (May 2016) that as Central Government Institutes undertake the susceptibility testing there was no need to re-check. However, East DMC

did not produce any evidence that susceptibility test of insecticides were ever tested by Central Government institutes. South DMC stated that insecticides used were tested in approved lab before their use. North DMC stated that entomological labs were being upgraded to carry out such tests.

1.3.4 Chemical control for adult mosquitoes

1.3.4.1 Deviations from prescribed techniques for spraying and fogging

As per NVBDCP guidelines, chemical sprays are not effective in most conditions and it is rare that an epidemic would be controlled by using these methods. In the last three years, MCsD and NDMC chemically treated 79.15 lakh and 4.48 lakh premises respectively using six different types of synthetic insecticides and applied three different techniques i.e. Insecticidal Residual Spray (IRS), Indoor Space Spray and Indoor and Outdoor Space Fogging. However, details of the premises treated with chemicals such as name of the owner of house, house number, address, type of premises and reasons for resorting to chemical treatment were not maintained by the MCsD and NDMC. An analysis of techniques used by MCsD and NDMC for chemical treatment to kill mosquitoes inside houses revealed the following:

(i) *Insecticidal Residual Spray (IRS)*

The Directorate prescribes this technique of vector control in rural settings only. The Directorate did not prescribe adoption of IRS for Delhi. However, MCsD and NDMC adopted this technique to treat 13.79 lakh houses during January 2013 to December 2015 at a cost of ₹ 1.12 crore. The reasons and circumstances under which this non-prescript technique was used were not on record.

Further, the Directorate stipulated that IRS, being a technical task, should be carried out by trained persons with Stirrup Pumps¹¹. Audit noticed that out of 12.52 lakh houses treated with IRS by South and North DMC, Knapsack Pump instead of Stirrup Pump was used in 8.97 lakh houses. NDMC also did not use Stirrup Pump for IRS. As proper technique was not used for IRS, it could not be ascertained whether the desired results were achieved.

The Directorate prescribed a protocol to be followed for concurrent and consecutive supervision for IRS. Nothing was on record to establish whether officials at supervisory levels had verified the quality and coverage of spray through IRS as specified in the guidelines.

(ii) *Indoor Space Sprays*

In this technique, a solution of pyrethrum is sprayed in indoor conditions with hand operated pumps with micro discharge nozzles. Program guidelines state

¹¹ Stirrup Pumps with spray nozzle tip having the discharge rate of 740 to 850 ml per minute and 10-15 cm plunger movement at a pressure of 10 PSI.

that chemical space sprays are not effective in most conditions and it is rare that an epidemic will be controlled by use of these methods. While NDMC did not use this technique, MCsD treated 11.51 lakh premises during January 2013 to December 2015 with this technique using 9,508.04 litres of pyrethrum costing ₹ 1.43 crore.

It was further noticed that though the guidelines and IVM prescribe use of the pyrethrum mixed in kerosene for indoor spray, North DMC sprayed pyrethrum diluted with diesel in 3.64 lakh (50 per cent) out of 7.22 lakh houses. Spraying houses with solution of pyrethrum and diesel was a deviation from prescribed norms. The Directorate confirmed to Audit in July 2016 that pyrethrum can only be used with kerosene in indoor sprays as distinct from indoor fogging with diesel.

Further, program guidelines prescribe periodic indoor space sprays to achieve the desired results. But no record was maintained to indicate the number of houses where indoor spray was repeated nor was any study conducted to ascertain the impact of this technique on the mosquito population.

(iii) Indoor fogging

IVM prescribes a formulation of pyrethrum and kerosene for indoor space fogging through hand held fogging machine. Program guidelines state that this formulation is a natural product and non-toxic to humans and other non-target organisms and that vectors had not developed resistance to this formulation. Pyrethrum is also widely regarded as more environment friendly as it was relatively bio-degradable. The Directorate clarified to Audit in July 2016 that pyrethrum with diesel can be used for indoor fogging and not malathion. It was however noticed that while NDMC carried out indoor fogging of pyrethrum with diesel in 3.69 lakh houses, MCsD deviated from this formulation and carried out indoor fogging in 54.64 lakh houses with a formulation of malathion with diesel instead of using pyrethrum and kerosene which is prescribed for such indoor fogging.

1.3.4.2 Outdoor fogging

WHO guidelines recommend outdoor fogging only in emergency situations to suppress an ongoing epidemic or to prevent an incipient one. Program guidelines state that chemical space spray is not effective in most conditions and fogging often creates a false sense of security. The Program guidelines defines two techniques for outdoor fogging when it is to be used viz. (i) thermal fogging by a vehicle mounted thermal fogging machine using a mixture of Malathion and Diesel and (ii) Ultra Low Volume Spray (ULV) of any of organo-phosphorous insecticide. The guidelines recommend water

based ULV of liquid insecticide as being more cost effective than thermal fogging since no diluent is used in this technique.

MCsD and NDMC undertook thermal outdoor fogging during the dengue season in the years 2013 to 2015 at a cost of ₹ 95.¹² lakh as a routine exercise without exploring the possibility of adoption of ULV spray which is more cost effective. Further, no study was carried out by the MCsD and NDMC to ascertain the efficacy of the thermal fogging.

South and North DMC stated (May 2016) that outdoor fogging was carried out mainly during outbreak like situation and was not a regular exercise. The reply is not factually correct as records of both corporations established that fogging exercise was carried out regularly during the period from September to November in the last three years. East DMC confirmed that outdoor fogging had limited effect and it was an appeasement exercise which was undertaken as per demand/complaint/media coverage. The replies were silent on the issue of not adopting the ULV technique for outdoor treatment.

1.3.5 Chemical control for larvae

WHO guidelines prescribe that larvae habitats should be treated with chemicals only if environmental management methods or other non-chemical methods cannot be easily applied or are too costly. IVM states that application of chemicals is difficult and expensive on a long term basis and therefore chemical larvicides are best used in situations where vector surveillance indicate the existence of certain periods of high risk and in localities where outbreaks might occur. Audit observed the following:

(i) Injudicious and excess application of chemical

Bacillus Thuringiensis Israelensis (BTI) is used as larvicide for biological control of larval stages. BTI is sprayed on water having already developed larva killing it in 24 to 48 hours. BTI solution destroys already developed larva and is not meant to prevent breeding. Audit noticed that BTI was being regularly sprayed on flowing water in drains without ensuring presence of larvae instead of ensuring their cleanliness through environmental modification methods. Moreover, the prescribed frequency for applying BTI is once in two weeks whereas MCsD were applying this chemical on weekly basis resulting in excess usage of this biological agent. During January 2013 to December 2015, MCsD and NDMC used 553.14 tons and 5,765 liters of this larvicide in small drains in residential colonies at a cost of ₹ 37.26 crore.

Since neither WHO nor the program guidelines envisaged use of BTI in drains nor had the corporations carried out any study to ascertain its impact on

¹² Includes cost of Malathion used in indoor fogging.

mosquito population in and around the areas sprayed, its utility or effectiveness could not be established.

South and North DMC confirmed (May 2016) that BTI was sprayed on flowing drains while East DMC accepted (May 2016) that no larvicide was to be sprayed on free flowing water of drains and field workers were supposed to spray on the polluted water mainly on the banks of water bodies once a week.

(ii) No records kept of use of a larvicide

Temephos EC 50 *per cent* is a larvicide sprayed on water having already developed larva. During January 2013 to December 2015, MCsD and NDMC used 11,684 liters and 1,306 liters Temephos EC 50 respectively incurring an expenditure of ₹ 79.76 lakh. However, no record was maintained of locations and circumstances under which this larvicide was used.

(iii) Use of unapproved Temephos granules

WHO prescribes that larviciding should be considered as complementary to environment management and should be restricted to containers that cannot otherwise be managed. Use of Temephos granules is not approved for the program by the Directorate. However, MCsD and NDMC issued 345.50 tons and 4.46 tons of it respectively to DBCs/AMGs to be applied in household water containers, money plants, flower vases, overhead tanks, bird pots, discarded tyres, air coolers etc. during the period from January 2013 to December 2015 although these containers could have been managed by simply draining the water out of them and periodically refilling them with fresh water. The expenditure incurred on this was ₹ 2.09 crore. No study was conducted to assess the impact of this larvicide on mosquito population.

1.3.6 Vector control was not an integrated exercise

Destroying adult mosquitoes and destroying of larvae are complementary to each other. Both exercises should be taken up simultaneously for effective vector control. Though MCsD and NDMC had carried out insecticidal residual spray, space focal spray and indoor fogging in 83.63 lakh houses between January 2013 and December 2015, there was nothing found on record to indicate that larviciding had also been undertaken simultaneously. Killing mosquitoes without destroying larva and vice versa is an incomplete vector control exercise and dilutes the effectiveness of the entire effort.

1.3.7 No action to eliminate breeding sites identified by DNVBDCP

Cross Checking Organization (CCO) of the Directorate undertakes random exercises to independently check breeding of mosquitoes in different parts of NCT of Delhi and sends its reports on locations where breeding was detected to the concerned officials to take appropriate action. Audit however noticed

that no records of action taken on the report of CCO were being maintained nor had the Directorate pursued the matter as a measure of monitoring and oversight.

1.3.8 No assurance of quality of insecticides procured

Insecticide being used by MCsD and NDMC are recommended by the WHO for use in public health with the stipulation that the recommendations are valid only if linked to WHO specifications as to quality control. South DMC and North DMC had been procuring insecticides through a consultant since 2006. As per the consultancy agreement (17 March 2006), the consultant was to ensure quality compliance with technical specifications and parameters by conducting inspections at pre and post-dispatch stage of the consignment of insecticides in accordance with the prevailing Drug and Cosmetics Act, 1940, and the Pharmacopoeia, Standards and Insecticide Acts and Rules. The consultancy agreement further provides that samples drawn during the pre/post-dispatch inspection will be tested only at the Sri Ram Institute of Industrial Research (SRIIR). However, the agreement did not mention the procedure of taking the sample and the person authorized to take such sample. It was noticed that though samples were sent to SRIIR by the consultant before dispatch of the consignment, these were not drawn in the presence of officers either from South DMC, North DMC or SRIIR. Test reports of SRIIR submitted by the consultant also did not have the name of person who took the samples. Thus, there was no assurance that samples tested by the SRIIR were from the consignment that was actually delivered to MCsD. It was further noticed that no sample was drawn or tested at post-dispatch stage or at the time of receiving the consignment by South DMC and North DMC. However, East DMC and NDMC sent samples at post-dispatch stage.

1.3.9 Vector control through legislation

MTP-2011 provides that the plan for prevention of dengue should be supported with legislation and suggests measures for dengue control in urban areas by introducing necessary building bye-laws. Audit observed that:

- Annual Action Plan of MCsD of 2013 mentioned that existing building bye-laws should be revised on the pattern of the Mumbai Municipal Corporation Act, 1928, where owners of houses are compelled to make necessary arrangements for keeping their premises free from mosquito breeding.
- A high level meeting held on 18 March 2015 decided to revise the building bye-laws on the Mumbai pattern and to increase the penalty of ₹ 500 to ₹ 5,000 to be charged from the owners of premises where mosquito breeding is detected.
- Annual Action Plan also mentioned that section 269 of the Indian Penal Code should be invoked for legal actions against regular offenders for creating/encouraging mosquito breeding conditions.

However, no action was initiated on the above proposals. MCsD and NDMC did not even consistently impose the existing penalty on offenders. Out of a total of 6,06,257 houses found with mosquito breeding, only 65,545 (11 *per cent*) were challaned. Similarly in NDMC, challans were issued in only 7.65 *per cent* of positive breeding cases.

Absence of enabling legislative provisions to compel owners to keep their premises mosquito free coupled with lack of enforcement of even existing provisions that could act as a deterrent undermined effective vector control and efforts to eradicate dengue.

1.3.10 Preventive measures in areas with Cantonment Board and Railway

Scrutiny of the records of Chief Health Inspector/Malaria, Delhi Main under Northern Railway revealed that a roster was maintained and area wise teams were deputed to carry out fogging and spraying on daily basis to cover all Railway premises. In addition, fogging and spraying was done immediately as and when any information or report was received regarding a confirmed dengue case in railway colonies. Survey of the houses of railway colonies was also conducted along with the officials of Municipal Corporation of Delhi and challans were issued to defaulters during the monsoon season.

Pursuant to a decision (May 2012) of the Inter sectoral co-ordination committee that Northern Railway would run special trains in the month of July every year for anti larval measures, a special train with power spray for anti-larval measures along the railway track had run during the years 2013 to 2015 during the period from August to October.

Insofar as the Delhi Cantonment territory is concerned, the Station Health Officer (SHO) is responsible for anti-mosquito operations in areas occupied by serving defence personnel while the Delhi Cantonment Board (DCB) caters to the 0.82 lakh civilian population living in the Cantonment area. While SHO took the requisite measures for mosquito management in his jurisdiction, action on the part of the DCB was lacking. DCB could utilize only about 26 *per cent* of its budget allocation for anti-mosquito operations during the three years (as depicted in Table 1.1.3). DCB did not prepare any annual program during the years 2013-2015 for fogging and spraying of insecticides in the civilian area under its jurisdiction nor were any details of fogging actually done and premises treated maintained. No action plan was prepared for source reduction to eliminate mosquito breeding nor was any report on reduction of mosquito breeding sent to the Directorate.

Thus, while necessary steps had been taken by the Northern Railway, preventive measures undertaken by MCsD and the Delhi Cantonment Board did not provide any assurance as to their effectiveness.

1.4 Response to Outbreaks

1.4.1 Inactive Dengue Task Force

A Dengue Task Force was constituted by GNCTD in November 2012 under the Chairmanship of Secretary (Health) GNCTD with Director of Health Services, GNCTD and MHO, SDMC as Vice Chairmen. Additional Director (Public Health), GNCTD, MHOs of North/East MCD and NDMC and SHO of Delhi Cantonment Board were its members. The Task Force was to formulate action plan for containment of dengue and other vector borne diseases in NCT of Delhi. However, Audit noticed that neither any action plan for containment of dengue and other vector borne diseases was finalized by this Task Force nor any meetings or activities undertaken in 2014 and 2015.

1.4.2 No mechanism for reporting of outbreak of dengue

The Long Term Plan defines the term “outbreak of dengue”¹³ and prescribes that on receipt of the report of occurrence of fever, the medical officer/zonal health officer would visit the affected area to conduct epidemiological investigations to find out the probable causes of fever and to collect 5-10 *per cent* blood samples randomly from the affected population to send to Sentinel Surveillance hospitals for serological/virological confirmation. Fifty *per cent* of the serum samples received by the hospital would be transported to the apex referral laboratory for virological diagnosis. In case any blood sample is found positive for dengue by the SS hospital laboratory or the apex referral laboratory, the locality would be declared as having outbreak of dengue. However, no such mechanism was developed in GNCTD/MCsD/NDMC.

1.4.3 Rapid Response Teams not constituted

MTP 2011 stipulates that outbreak of arboviral diseases like dengue require quick emergency action to immediately control infected mosquitoes in order to interrupt or reduce transmission and reduce or eliminate the mosquito breeding sites. MTP also suggests constitution of a Rapid Response Team (RRT) comprising of epidemiologists, entomologists, microbiologists and Information, Education and Communication personnel to take the following steps on receipt of report of a suspected or confirmed case from a Sentinel Surveillance Hospital (SSH):

- Confirm whether any case was reported earlier from the area and analyze/ compare the previous and current data; and
- Visit the area as early as possible to collect information on cases, their clinical signs/symptoms, history of exposures and other relevant epidemiological/entomological and laboratory information to substantiate the outbreak.

¹³ An outbreak of fever would be considered if the number of fever cases of similar nature reported by health workers are five or more in a locality having population 10-15 thousand during a period of seven days.

It further provides that the findings should be communicated to the State/District Vector Borne Disease Control Program and the Municipality Health Officer for implementation of control measures. However, no RRT was constituted in MCsD and NDMC. No mechanism was in place to plan anti-mosquito activities and there was no system to assess the disease burden to judge whether it is an epidemic or isolated occurrence of the disease.

In Northern Railway also, no RRT was formed although 64 cases of dengue fever in 2013-14, 24 cases in 2014-15 and 339 cases in 2015-16 were reported in the Central Hospital, Northern Railway. Similarly no RRT was formed in the Delhi Cantonment Board.

1.4.4 Hospitals not equipped for testing the dengue virus during outbreak

As per the Long Term Action Plan, each SS Hospital should have an Elisa reader, Elisa washer and other necessary equipment for dengue serology. In case equipment are not available, SPO should immediately arrange for the same in consultation with the Directorate of NVBDCP to ensure availability of these facilities in the hospitals. It was observed that in Pt. MMM Hospital¹⁴ and Satyawadi Raja Harish Chandra Hospital, one Elisa Reader remained non-functional since 2013. These hospitals purchased new Elisa Reader each only in September and October 2015. In another instance, BSAH¹⁵ purchased Elisa Micro Plate Reader on 22 September 2015, but the same was issued to Microbiology Lab 66 days after its receipt i.e. on 28 November 2015. Thus, these three hospitals were not fully equipped for testing the dengue virus in patients when the outbreak was at its peak. It is only when the outbreak was receding that these hospitals received the machines.

1.4.5 Inadequate facilities in Railway and Cantonment Board Hospitals

Bed nets, mosquito repellent were not provided to dengue patients in the Central Hospital, Northern Railway, to prevent spreading of dengue virus from infected persons to non-infected ones.

There are three hospitals of the Ministry of Defence functioning in the Cantonment area in NCT. While the Base Hospital and Army Hospital are for the treatment of service personnel, the Cantonment Board Hospital provides medical facilities to the civilian population residing in the cantonment area. Both the Base Hospital and Army Hospital were appropriately equipped and staffed for treatment of dengue patients. However, the Cantonment Board General Hospital lacked any facility for indoor patient treatment. A total of 353 patients detected by this hospital as positive dengue cases in 2015 were treated in Outdoor Patient Department (OPD) or referred to other Government Hospitals.

¹⁴ Pandit Madan Mohan Malviya Hospital.

¹⁵ Baba Saheb Ambedkar Hospital.

1.5 Monitoring and Supervision

1.5.1 No mechanism for supervision and monitoring

Municipal Health Officers (MHOs) of respective MCsD are overall in-charge of Public Health Departments divided into 12 zones with a Deputy Health Officer (DHO) heading each zone. Zones are further divided into circles which is the primary unit for field work. However, there was no mechanism or prescribed procedure for supervision and monitoring of anti-mosquito activities undertaken by the field staff at circle level by the MHOs or other authorities. MCsD and NDMC maintained no record of the observations made by MHO or of any directions issued to the field staff.

Moreover, MCsD and NDMC did not develop a mechanism to take feedback from public on the anti-larval work done by the DBCs/AMGs or the work done by field workers in their respective beat. In the absence of proper supervision by the management and a feedback from the public, there is no method for an empirical periodic evaluation of the level of effectiveness and efficiency of the anti-mosquito measures taken by MCsD.

1.5.2 Under reporting of dengue cases and dengue deaths

South DMC, as the nodal agency in NCT of Delhi, collects data of positive dengue cases from the hospitals for further transmission to Government of India (GoI). The exercise facilitates GoI in assessing the actual disease burden. Details of the positive cases reported by hospitals to the nodal agency and the cases actually further intimated by the nodal agency to the Directorate during the last three years are depicted in **Table 1.1.4:**

Table 1.1.4: Cases reported by Hospitals and those intimated to Directorate

Year	Positive cases reported by hospitals	Cases intimated to the Directorate
2013	23,451	5,574
2014	4,596	995
2015	39,531	15,867
Total	67,578	22,436

Out of the total 67,578 cases reported by hospitals, the nodal agency reported only 22,436 cases (33 *per cent*) to the Directorate. Remaining cases were deleted on various grounds such as cases which were tested positive through Rapid Kit Test (11,345 cases), cases where complete address was not available (2,564 cases), cases declared suspected by hospitals (13,417 cases), cases not traceable (4,140 cases), cases where patients acquired the infection from other States (1,711 cases), cases which pertained to other States (2,611 cases) and cases where addresses were of other States (9,354 cases).

The Action Plans of 2014-15 and 2015-16 for prevention and control of vector borne diseases in Delhi stipulated that a Dengue Death Review Committee would be constituted to carry out medical audit of all dengue cases. Guidelines for this Committee were to be developed by the Directorate of NVBDCP. Action plan further stipulated that dengue death should be notified only after it had been confirmed by the Dengue Death Review Committee. It was, however, noticed that neither DNVBDCP developed the guidelines nor did GNCTD pursue the matter with DNVBDCP. During 2015, hospitals reported 409 dengue deaths to the nodal agency who in turn forwarded these cases to the Dengue Death Review Committee. Out of these 409 death cases, the Committee confirmed only 60 deaths (46 from Delhi and 14 from outside Delhi) as dengue deaths. In 2014, nodal agency sent 50 dengue death cases, but Committee confirmed only three cases. In the absence of any criteria/guidelines for the Committee to review the reasons for death, it is not clear how the remaining deaths were not considered as dengue deaths though these were confirmed by the hospital as dengue deaths.

In 2015, out of 967 medical units (933 private hospitals and Nursing Homes and 34 Government Hospitals) which were required to report the dengue cases/ dengue deaths to SDMC, only 27 SSH and 43 private hospitals and nursing homes reported dengue positive cases and death cases to nodal agency. But the nodal agency made no arrangement to collect data from the remaining private hospitals and nursing homes. Thus, the disease data communicated by the nodal agency to the Directorate was incomplete and could not be said to be comprehensive or reliable.

South DMC stated (May 2016) that details of dengue cases on being received from hospitals are investigated by the concerned civic body and only those cases which belong to Delhi are considered as positive dengue cases.

1.5.3 Delay in reporting of severity of impending disease

DENV-1 and 3 cause mild dengue with high morbidity and low mortality. DEN V-2 and 4 are known as the more virulent serotype among the four and cause complications and high mortality. The Directorate identified the National Center for Disease Control (NCDC) and the All India Institute of Medical Sciences (AIIMS) Delhi as Apex Referral Laboratories (ARLs) for virus isolation of dengue in Delhi. As per the advisory issued to all ARLs by NVBDCP on 29 May 2013, ARLs were responsible for providing information about the circulating dengue serotypes/genotypes in linked States. In a meeting held on 8 May 2014, it was decided that ARLs would carry out viral serotyping in the beginning of the transmission period and reports would be shared with all the implementing agencies for wider circulation among the clinicians. However, it was noticed that both the ARLs of Delhi reported the serotypes in September 2015 when epidemic had already broken out in Delhi. Had ARLs

submitted their reports timely, health authorities would have been able to assess the severity of impending disease and make timely preparations.

Moreover, the Union Ministry of Health & Family Welfare instructed (February 2015) that all SSHs should collect blood samples from suspected patients with fever syndrome and process on a timely basis for serologic confirmation. Further, as per the Action Plans 2014 and 2015, all SSHs were required to test 10 *per cent* of fever cases for dengue during non-transmission period for disease forecasting. Audit observed that neither of these instructions were followed by hospitals in 2015 nor had any mechanism been developed by GNCTD to ensure compliance by hospitals to these instructions. Only when Dean, Maulana Azad Medical College Delhi requested the Medical Superintendent, Lok Nayak Jai Prakash Narayan Hospital Delhi in October 2015 to submit Positive Cases Reported (PCR) samples for serotypes of dengue patients which would help in determining the profile of dengue fever/strain did DHS forward the request to several other hospitals on 19 October 2015. Hence, there was clearly a lack of diligent observance of the instructions issued by GoI.

1.6 Inter-sectoral Coordination

Public Health Department, South DMC organized workshops every year jointly with East DMC, North DMC and NDMC on prevention and control of vector borne disease in Delhi and brought out a document highlighting the measures to be taken to control and prevent vector borne diseases. In these workshops, several decisions are taken which are to be implemented by various implementing departments. Audit observed that 38 out of 138 decisions taken in the workshop held in 2015 were to be implemented by MCsD themselves, 22 by all civic bodies, three by Delhi Government departments, one by departments of Government of India, five by South DMC and 11 by Sentinel Surveillance hospitals. Fifty-eight decisions were to be implemented by more than one agency including all MCsD, GNCTD Departments and civic bodies. Audit observed that no arrangements were made to monitor compliance of these decisions nor was there any Action Taken Report from the concerned departments on the implementation of the decisions taken at the workshop. Moreover, there was no evidence that MCsD and NDMC themselves initiated action on the decisions which were identified to be implemented by them.

1.7 Capacity Building

1.7.1 Inadequate organizational structure

MCsD were implementing the National Anti-Malaria Program (NAMP) through their Malaria Department (MD). Though both malaria and dengue are spread by mosquitoes, they are different diseases. Malaria is a parasitic disease whereas dengue is an arboviral disease. Therefore, inclusion of viral diseases

like dengue in the program of MD required re-structuring to make it capable of tackling dengue and other viral diseases. However, no such change in structure of MD was effected. There are posts of Anti Malaria Officer (AMO) in each zone of the Public Health Department (PHD) to implement and supervise anti-malaria activities but no corresponding posts for dengue or other viral diseases. Similar position prevailed in NDMC also.

1.7.2 Lack of adequate infrastructure

A Malaria Circle is the primary unit from where all field operations are carried out to implement the program. A survey of all the 292 circle offices of MCsD showed that even basic infrastructure/facilities were not available in most of the offices. Some instances are given in **Table 1.1.5** below:

Table 1.1.5: Circles with Inadequate Infrastructure/Facilities

Sl.No.	Lack of infrastructure/facilities	No. of circles
1.	Electricity connection	64 (22%)
2.	DJB water connection	195 (67%)
3.	Proper office accommodation	76 (26%)
4.	Ceiling fan and lighting arrangement	70 (24%)
5.	Toilet and washroom facilities	97 (33%)
6.	Storage space for chemicals and insecticides	167 (57%)
7.	Space for storing empty containers	176 (60%)
8.	Landline telephone	258 (88%)
9.	Sweeping and cleaning arrangements	177 (61%)

It was observed that:

- (i) Though BTI is the most widely used chemical in MCsD and is mixed with water to prepare a solution, *67 per cent* of circles did not have water connection.
- (ii) About *88 per cent* of circles did not have telephone facility to keep in touch with public or senior officers and *22 per cent* were without electricity connection.
- (iii) Proper office accommodation was not available in *26 per cent* of circles and toilet facilities were not available in *33 per cent* of circles.
- (iv) DNVBDCP guidelines define a protocol for transportation and storage of insecticides and disposal of remains of insecticides and empty packing. Zonal offices of MCsD are situated at a distance of one to 25 kms from PHD headquarters and circle offices are situated from one to 18 kms away from zonal offices. Insecticides are frequently transported from zonal stores to circle offices through bicycles for utilization.
- (v) In *57 per cent* of circles, proper space was not available for storing

insecticides and petroleum products, while 60 *per cent* of circles had no space for storing used and empty containers.

1.7.3 Non-functional equipment

Chemical control measures of vector management are undertaken with the help of various types of pumps. Audit noted that 26 *per cent* of available pumps/machines were not working in the MCsD while 65 *per cent* of available pumps/machines were not working in NDMC.

In Northern Railway against the requirement of three fogging machines only one fogging machine was available while another was lying out of order. Further, only 10 Knap Sack pumps were available against a requirement of 15 pumps.

1.7.4 Shortage of human resources

The Malaria Department was formed in the early fifties. Though the inhabited area and the population of Delhi has increased manifold since then, the sanctioned posts in Malaria Department has not been reviewed. MCsD were suffering from shortage of supervisory staff ranging from 46 to 97 *per cent* and in workmen cadre from 20 to 36 *per cent*.

In NDMC, there was no sanctioned post of entomologist, while sanctioned posts of epidemiologist and sanitation officer were lying vacant as of January 2016. There was 12 *per cent* shortage of Anti Malaria Gangmen (AMGs) and 47 *per cent* shortage of Anti-Malaria Jamadaars (AMJs). Though there was shortage of field staff, many Malaria Inspectors (MIs), Assistant Malaria Inspectors (AMIs) and Field Workers (FWs) were deployed on ministerial work.

There was a shortage of 22.22 *per cent* of manpower in field worker cadre with the Chief Health Inspector (Northern Railway) and necessary training for vector management was also not provided to the field workers.

Mosquito control is a labour intensive task requiring regular supervision. The current availability of human resources is clearly not commensurate with the extent of the problem and the concerned departments were not in a position to fully and effectively implement IVM in NCT of Delhi.

MCsD stated (May 2016) that matter for filling up vacant posts was being pursued.

1.8 Behaviour Change Communication

1.8.1 Non-formation of multi-disciplinary planning team

As per WHO guidelines, dengue fever epidemiology requires a mixture of

expertise in different disciplines to define the required set of technically sound solutions. This necessitates assembling of a multi-disciplinary planning team. However, the same was not formed by the State Program Officer in Delhi.

1.8.2 Ineffective public awareness campaign

Public awareness campaigns are intended to increase community awareness about dengue related prevention and control measures.

(i) Government of NCT of Delhi

The main period for the spread of dengue viruses (outbreak) is June to November every year and publicity campaigns relating to prevention of dengue was to be released before the spread of dengue viruses i.e. in June and July. During the last three years, GNCTD incurred an expenditure of ₹ 10.04 crore on awareness campaigns for prevention of dengue as shown in **Table 1.1.6**.

Table 1.1.6: Details of expenditure on awareness campaign

Year	Expenditure ₹ in crore)	Period of advertisement
2013-14	4.23	31 August to 19 November 2013
2014-15	0.41	25 October to 23 November 2014
2015-16	5.40	September to October 2015

The advertisements were released between September and November in all the three years i.e. after the outbreak of dengue. Thus, the very objective of the expenditure of creating awareness of the measures to prevent outbreak of dengue was defeated.

(ii) Municipal Corporations of Delhi

Field publicity campaigns of MCsD started in the month of October every year. Launching of public awareness campaign after monsoon season has little justification.

1.9 Case Management

1.9.1 Use of non-recommended Rapid Diagnostic Test (RDT)

The National Guidelines for Clinical Management of dengue fever state that Rapid Diagnostic Kits (RDTs) used for detection of dengue are not considered very accurate and tend to show a high rate of false positives compared to standard tests. WHO guidelines also stipulate that these kits should not be used to guide management of dengue/DHF. Reliance on such tests could result in increase in the case fatality ratio. Hence use of RDTs is not recommended. Only ELISA based kits were to be procured instead of RDTs.

Audit observed that 43 RDT kits were purchased by hospitals at a total cost of ₹ 4,15,543 as detailed in **Table 1.1.7**.

Table 1.1.7: Procurement of RDT Kits

Sl.No.	Hospital	No. of kits purchased	Cost (₹)
1.	RML	10	15,500
2.	BMH	2	27,800
3.	GTBH	22	1,94,670
4.	SRHCH	9	1,77,573
	Total	43	4,15,543

Use of RDT kits does not provide the requisite degree of assurance as to the accuracy of the diagnosis and assessment of the actual number of dengue cases.

1.9.2 Inadequacies in testing in suspected dengue cases

A large number of OPD and IPD patients of dengue fever were treated during the dengue period from August to November 2015. However, blood sample testing ratio in six selected hospitals revealed that only 44 *per cent* dengue fever patients in OPD and IPD of Medicine and Pediatrics Departments were tested for basic blood tests from August to November 2015. Audit could not ascertain as to how patients in IPD received treatment without pathological tests or follow ups as basic pathological test was a pre-requisite for effective management of patients.

1.10 Conclusion

Despite the recurrence of dengue over the years in the NCT of Delhi and the spike in dengue cases as well as mortalities during 2015, the institutional mechanisms and actions taken by the departments as well as the municipal corporations were not commensurate with the magnitude of the problem though funds were not a constraint. There was no set mechanism for reporting outbreaks or responding to outbreaks and surveillance system for early warning of impending disease and assessing severity of outbreak of disease was inadequate. Malaria circles which are the primary units for field operations suffered from an almost debilitating shortage of basic infrastructure and facilities. Stereo-typical implementation of anti-mosquito measures without mapping with actual delivery of service undermined containment of vector borne diseases.

Environmental modification which is a key element in sustainable vector control was not given due emphasis and MCsD and NDMC largely relied on chemical insecticides to control mosquito population. While extensive spraying and fogging operations for control of adult mosquitoes and other chemical measures for control of larvae were undertaken by all the municipal

corporations at an overall cost of ₹ 43.65 crore, the techniques adopted as well as formulations used differed from that recommended in the Program guidelines raising questions as to their effectiveness. There was no monitoring of the effectiveness of the work done by domestic breeding checkers. The MCsD incurred an expenditure of ₹ 109.43 crore on hiring of these breeding checkers. Absence of a policy for chemical use, not conducting susceptibility tests for insecticides, not carrying out any impact study on techniques applied to control mosquito population and adoption of non-prescript method to control mosquito population indicated absence of informed decision making process in MCsD and NDMC.

While the Northern Railway had undertaken systematic fogging and spraying operations in the areas under their jurisdiction, the Delhi Cantonment Board did not maintain any record of anti-dengue operations in areas under its jurisdiction. The Board utilized only 26 *per cent* of the funds available to it for anti-mosquito operations during the period under review.

1.11 Recommendations

Based on the audit findings, it is recommended as follows:

- *Mapping of dengue prone and sensitive areas in NCT of Delhi may be undertaken and plans framed and prioritized and resources allocated on this basis. The Dengue Task Force should meet at regular intervals for this purpose.*
- *Given the multiplicity of agencies dealing with dengue prevention and control in NCT of Delhi, an inter-agency coordination mechanism may be established to address the matter of prevention and control of dengue in a coordinated and coherent manner.*
- *A Standard Operating Procedure may be developed and instituted for epidemiological surveillance along with requisite laboratory facilities for early warning of impending disease and assessing severity of outbreak of disease.*
- *An impact assessment may be undertaken of the fogging and spraying exercises undertaken by the municipal corporations keeping in view the Program Guidelines and those of the NVBDCP to assess their efficacy and for corrective action if required.*
- *The engagement of DBCs/AMGs by municipal corporations should be reviewed so as to ensure that they are commensurate with the task at hand. The period of their engagement should be synchronized to see that they are engaged during the period when they can actually be deployed for the intended task. The work done by them should be monitored and supervised.*

- *The reporting mechanism may be strengthened whereby all concerned units communicate accurate and timely information relating to dengue cases and dengue deaths to the nodal agency and the same is further transmitted to the Directorate of NVBDCP.*
- *Public awareness campaigns should be planned to commence well before the onset of dengue as a preventive measure and not after its occurrence or when it is on the wane.*
- *Basic infrastructure may be ensured in a time-bound manner to the malaria circles to enable them to effectively discharge their functions. Facilities at hospitals to attend to the upsurge of dengue patients should be reviewed before start of the dengue period and gaps in terms of testing facilities addressed.*

The matter was communicated to the Government of Delhi (May 2016 and July 2016) and to the Union Ministries of Health (July 2016), Delhi Cantonment Board (July 2016) and Railways (July 2016). While Delhi Cantonment Board accepted the facts (July 2016), the replies of other agencies were awaited (16 August 2016).

Chapter II

Compliance Audit

Chapter-II COMPLIANCE AUDIT

Department of Urban Development

2.1 Re-development of Rajiv Gandhi Chowk

The re-development of Rajiv Gandhi Chowk was undertaken to restore its architectural and heritage character while easing traffic and pedestrian movement to improve the overall ambience of this premier commercial center of the national Capital. This was not achieved. Lack of realistic planning coupled with poor execution and monitoring of implementation of works led to non-achievement of the project objectives of upgradation of public conveniences and improvement in civic services. The scope of the project as originally envisaged was drastically reduced from ₹ 615.20 crore to ₹ 477.02 crore. Expenditure amounting to ₹ 18.05 crore on utility corridors, surface development, water supply and flooring of corridors was either unfruitful or avoidable. The efficacy of augmentation of fire-fighting capabilities done at a cost of ₹ 4.97 crore could not be assured in audit.

Connaught Place (CP), originally designed in 1929 as a shopping-cum-residential complex has three circles – outer, middle and inner. The buildings, all private, are aligned along these circles. Connaught Place was renamed as Rajiv Gandhi Chowk in the year 1995. Over the years, the ageing process as well as adhoc changes and additions to the structure had resulted in deterioration of the overall condition of the heritage complex and defacement of its original façade. Further, development of the Underground Palika Bazar and Rajiv Chowk Metro Interchange Terminal inside the inner circle increased footfalls and number of vehicles in CP resulting in traffic congestion and conflict between vehicular and pedestrian on roads. Increase in commercial activities and growing population put additional pressure on the civic infrastructure of CP.

A meeting was held in February 2005 under the Chairpersonship of the Secretary, Ministry of Urban Development (MoUD), Government of India (GoI), that was attended by Chairperson, New Delhi Municipal Council (NDMC) and officers from other agencies viz. Delhi Urban Art Commission (DUAC), Delhi Development Authority (DDA), Central Public Works Department (CPWD), and Delhi Traffic Police, where the Engineer-in-Chief, NDMC made a presentation highlighting the status of the area and its problems. Based on the discussions, NDMC submitted a Status Note to the Secretary MoUD, GoI on 30 May 2005 recommending preparation

of a comprehensive Redevelopment Plan for CP including the augmentation/upgradation of engineering services. The New Delhi Municipal Council (the Council) in February 2006 approved this recommendation and resolved that the final proposal shall be brought before it for administrative approval and expenditure sanction.

New Delhi Municipal Council entered into an agreement with Engineers India Limited (EIL) on 03 May 2006 for consultancy services for re-development of Connaught Place and its precincts. EIL submitted a Detailed Project Report (DPR) for re-development of Connaught Place comprising of sub plans with cost estimates, for:

- a. Restoration of architectural/heritage character of CP and examining the structural stability of its buildings;
- b. Construction of new subways, re-modeling of existing subways and re-designing of roads to make the outer circle signal free to enable free flow of traffic and safe movement of pedestrians;
- c. Enhancing the parking capacity of CP by construction of new underground parking facilities and development of surface level parking;
- d. Upgradation of public conveniences, environmental improvement, landscaping and streetscaping; and
- e. Engineering improvement of civic services *viz.* water and electricity supply, drainage and sewer system.

The Council approved the Project Report (November 2007) and decided to fund the project under the Jawaharlal Nehru National Urban Renewal Mission (JNNURM). The Council also approved (28 April 2008) entering into a turnkey consultancy agreement with EIL for the project (signed on 21 May 2008) where under EIL would be responsible for conceptualization, planning, design, engineering and execution of the project including award of works to contractors and subsequent inspection, testing and handover of the project to NDMC in a fully operational state. This agreement superceded the earlier agreement of May 2006. The consultancy fee was 8 *per cent* of the executed cost of the project (*plus* service tax) or ₹ 48 crore (*plus* service tax) whichever is less and was applicable upto December 2010. In the event of any delay in completion of project which was not attributable to EIL, additional fee beyond December 2010 was to be settled based on mutually agreed terms. The Council also accorded administrative approval and expenditure sanction of ₹ 615.20 crore for the implementation of the DPR.

Meanwhile, a DPR for ₹ 448.03 crore prepared for those works which were to be funded under JNNURM was sent to Government of India (GoI) on 15 April 2008 against which GoI sanctioned ₹ 88.82 crore as its share and

released the first instalment of ₹ 22.21 crore in February 2009. The Government of NCT of Delhi also released ₹ 38.06 crore as its share in the project to NDMC under JNNURM. Remaining expenditure on the project was met by NDMC from its own resources.

As per the turnkey consultancy agreement entered into with EIL in May 2008, the project was to be completed by November 2010. The final responsibility for implementation of the Project rested with the Engineering Department of NDMC under the supervision of its Engineer-in-Chief. A Project Co-ordination Committee (PCC) comprising of officers from NDMC was formed on 14 May 2008 to monitor the progress of the project and to give decisions as may be necessary during implementation. Subsequently, EIL with the approval of PCC, awarded 15 contracts to different contractors between April 2009 and July 2012 with a total contractual cost of ₹ 462.12 crore with stipulated dates of completion falling between 05 April 2010 and 10 November 2013. The contracts were actually executed between April 2010 and December 2014.

Since some major items¹ included in the DPR were not ultimately implemented by EIL, the Council reduced the scope of the project and revised the expenditure sanction from ₹ 615.20 crore to ₹ 477.02 crore in June 2012. As of March 2016, NDMC had transferred ₹ 423.77 crore to the ‘EIL-CP Project Account’. EIL had paid ₹ 387.05 crore to the contractors as of April 2016. Though EIL had withdrawn its work force from the site in December 2014, the project was yet to be formally declared complete and the accounts were yet to be closed (April 2016).

The first audit appraisal of the project appeared in Audit Report of the Comptroller and Auditor General of India (No. 6 of 2011-12) on XIX Commonwealth Games, 2010, relating to the Union Government (Civil), highlighting undue delay in completion of the project, change in scope of work, improper project planning and contract management. These findings were re-produced along with other audit observations on extra expenditure in the Report of the Comptroller and Auditor General of India for the year ended March 2011, relating to GNCTD. The Action Taken Notes on these Reports have not been submitted by GNCTD as of January 2016. The present audit appraisal of the project was conducted to assess the achievement of the project objectives and level of compliance with the extant rules and the principles of financial propriety.

2.1.1 Planning and preparation

Proper planning and preparation is a pre-requisite for effective and timely implementation. This is all the more imperative in a project that involves

¹ DMRC vomitories (₹ 5.60 crore), Horticulture (₹ 2.24 crore), CCTV/PA system in underground parking (₹ 6.72 crore), Underground parking (₹ 111.99 crore), Retrofitting (₹ 5.60 crore).

multiple stakeholders/agencies and execution in a busy commercial center in an urban area. Effective planning entails realistic conceptualisation and assessment of all factors that are relevant to execution of the project including identification and availability of site, allotment of resources to ensure optimal utilisation, timely execution of contracts and mechanisms for effective monitoring to ensure quality and timeliness of works done. Deficiencies in realistic conceptualization and planning would be reflected in the extent of achievement of the stated objectives.

Audit observed that the achievements of the project were not commensurate with some of the established objectives as originally envisioned as reflected in **Table 2.1.1** below:

Table 2.1.1: Short Achievement of Project Objectives

Sl. No.	Primary objective	Item of work to be executed	Work Executed/ Not Executed	Status of Work
1.	Conservation of heritage character and structural stability of buildings.	Restoration of façade of buildings in outer, middle and inner middle circles.	Restoration of façade was done only in outer and inner circles at an expenditure of ₹ 40.02 crore Middle circle was not covered.	In August 2010, PCC asked EIL to forward a plan for middle circle to be taken up after CWG 2010. PCC raised the issue in its meeting in November 2010 and March 2011. However, there was no further progress.
2.	Flooring of façade corridors.	Providing symmetrical flooring of sand stone in façade corridors matching with the original architecture of CP, as suggested by DUAC.	EIL included this work in three contracts, but it was not executed.	No reasons were produced to audit for non-execution of this item of work.
3.	Assessment of structural stability of buildings	EIL was required to appoint a specialized agency to study structural stability of buildings and forward recommendations/ suggestions to NDMC. Owners were to take remedial measures directly.	Desired structural stability study report was not obtained by NDMC from EIL and owners were not made aware of stability status of their buildings.	No reasons were produced to audit for non-execution of this item of work.

4.	Free flow of vehicular traffic and safety of pedestrians.	Construction of 8 subways and remodeling of existing 5 subways adding extra mouths all along outer circle, to provide uninterrupted signal free flow of traffic on outer circle and safe passage to pedestrians.	EIL awarded the work in November 2009 at a cost of ₹ 56.05 crore. Only two subways were completed and three existing ones were remodeled at a cost of ₹ 22.31 crore. Two other new subways, though taken up, were abandoned midway after incurring an expenditure of ₹ 3.21 crore.	Reasons not on record. PCC never pursued the matter with EIL for remaining subways. Expenditure of ₹ 3.21 crore on the abandoned subways was rendered unfruitful.
5.	Improvement in riding quality and longevity of roads.	Reconstruction of outer, inner and radial roads by cement concrete and middle circle road by granite cobbles at a cost of ₹ 12.56 crore.	Outer circle, inner circle and radial roads were resurfaced with bituminous concrete as extra item or deviation in the quantity through other ongoing contract. Middle circle was reconstructed with cement concrete.	Under the terms of the turnkey agreement, all statutory clearances to be obtained by EIL and any assistance required from government bodies was to be provided by NDMC. Hence, it was the responsibility of both EIL and NDMC to obtain the requisite clearances. The work was held up due to delay in tree cutting permission from Forest department. Due to the delay in seeking requisite clearance and release of work orders and the ensuing cycling event of CWG 2010, NDMC was left with no option but to construct the bituminous road.
6.	Providing escalators in subways to facilitate pedestrian movement and encourage people to use subways.	Installation of 64 escalators in new and existing subways at a cost of ₹ 80 crore. All subways were to be roofed.	EIL awarded the work for 58 escalators at a cost of ₹ 29.24 crore without the provision of roofed enclosures. Only 22 escalators were provided at a cost of ₹ 11.17 crore but no roof was provided to any of them. Fourteen of them were dysfunctional (18 March 2015) as expensive components were stolen.	36 escalators were not constructed. Further, of the 22 constructed, 14 were dysfunctional. Hence, only eight out of the originally envisaged 58 escalators were actually functional and the objective of facilitating pedestrian movement was not achieved.

7.	Augmentation of parking facilities.	Construction of two level underground parking of a capacity of 2200 Equivalent Car Space (ECSs) below the inner circle at a cost of ₹ 112 crore.	No such works were taken up for execution. NDMC deleted the parking facility from the scope of the work on 25 June 2012.	PCC asked (December 2008), EIL to give a presentation for automatic underground parking in inner circle. When EIL was asked to submit feasibility of new parking, EIL submitted on 04 March 2010 a concept of semi-automated parking. In December 2011, PCC deferred the parking project for next phase. As such there was no construction of underground parking facility in CP that would have eased congestion.
8.	Rain water harvesting system.	Rain water harvesting system in CP at a cost of ₹ 60.82 lakh to use surface run-off water from roofs, central park and pedestrian plaza for recharging of ground water purpose.	The proposed system was not constructed.	EIL attributed (May 2015) the reasons to space constraints which was indicative of deficient planning and conceptualisation.

As evident from above, none of the primary objectives of restoring the heritage character of Connaught Place, ascertaining the structural stability of the building and of easing traffic and pedestrian movement was achieved. This was attributable to lack of realistic planning as reflected in the drastic curtailment of the scope of work of the original DPR from ₹ 615.20 crore to ₹ 477.02 crore as well as delay in execution of works.

Audit also noted the following:

(i) EIL constructed an underground feeder corridor of 200 m length behind Madras Hotel in P-Block at a cost of ₹ 2.83 crore as part of a service corridor network to place power cables, water mains and other utilities. However, this feeder corridor was not connected to the main tunnel or to any other service tunnel and was lying idle. EIL stated (May 2015) that feeder corridor could not be completed as NDMC could not resolve issues of encroachment and *tehbazari* on construction site. Failure of NDMC to provide hindrance free site to EIL resulted in unfruitful expenditure of ₹ 2.83 crore.

(ii) As per the approved plan, an underground service trench was to be constructed all along the outer circle to place electric cables and other utilities. It was noticed that out of 2,317 meters only 1,000 meter of trench was constructed at a cost of ₹ 1.40 crore, as NDMC did not provide work site to

EIL. The incomplete trench was lying idle rendering the entire expenditure of ₹ 1.40 crore unfruitful.

Under the turnkey agreement, it was the obligation of NDMC to remove hindrances and provide land free from encumbrances to EIL for execution of work. Thus, failure of NDMC to provide hindrance free site to EIL coupled with taking up of work before ensuring encumbrance free site resulted in unfruitful expenditure of ₹ 4.23 crore.

2.1.2 Surface development plan

The Surface Development Plan, as approved by the Council, included environmental improvement, enhancement in landscaping, up-gradation of public conveniences and adequate lighting arrangements. EIL awarded the work on 11 March 2010 to a contractor with stipulated date of completion as 10 October 2010. The work was actually completed on 15 March 2013. Details of items included in the contracts and actually executed are given in **Table 2.1.2** below:

Table 2.1.2: Non/short execution of contract items of public utility

Sl. No.	Item of work	Nos. to be constructed/Installed	Nos. actually constructed/Installed	Shortfall (%)
1.	New toilets	34	11	63
2.	Kiosks	36	Nil	100
3.	Street lights	267	116	57
4.	High mast lights	10	Nil	100
5.	Litter bins	214	60	72
6.	Garden lights	1449	154	89
7.	Street furniture	300	Nil	100
8.	Drinking water fountains	Nos. not specified	Nil	100
9.	Playground equipment	-do-	Nil	100
10.	Development of gardens on terrace of Palika Bazar and Palika Parking along with two foot over-bridges to connect both	02	Not constructed	100
11.	A viewing platform of 15 m height to provide a spectacular view of CP	01	Not constructed	100

In terms of numbers, the percentage of shortfall ranged from 57 *per cent* to 100 *per cent*. The reasons for short execution of contract items were neither on record nor pursued by the PCC with EIL. Non/short execution of contract items of public utility deprived the general public of improved civic facilities and upgraded environment of CP as conceptualized in the approved DPR.

Audit also noted the following:

- (i) EIL incurred an expenditure of ₹ 1.27 crore on construction of plant beds along the inner circle, inner side of outer circle and radial roads and for providing good earth and manure in these plant beds. It was, however, noticed that no plant bed was existing at the inner side of the outer circle. NDMC informed (April 2015) that since the plant beds at inner side of the outer circle were creating problems for commuters and vehicles were being parked on these plant beds, the space wast subsequently covered by stone slabs. Thus, construction of plant beds at an unsuitable location resulted in wasteful expenditure of ₹ 60 lakh out of ₹ 1.27 crore incurred on construction of plant beds at the inner side of the outer circle.
- (ii) Similarly, an expenditure of ₹ 64.73 lakh was incurred on providing grass, grass grid and other line items inside the inner circle. Subsequently, EIL dismantled these items due to objection raised by New Delhi Traders Association (NDTA) rendering the expenditure infructuous.
- (iii) EIL provided 581 bollard lights valuing ₹ 31 lakh in CP. As some of the lights were stolen, EIL removed the remaining lights and handed them over to NDMC where they were kept in storage. Thus, providing these lights without ensuring their suitability for the location resulted in wasteful expenditure of ₹ 31 lakh.
- (iv) DUAC had approved use of sand stone in place of proposed granite flooring in the corridors of the façade. However, EIL used granite stone slabs. This resulted in extra expenditure of ₹ 2.69 crore as granite stone is costlier than sand stone. No reasons were found on record for use of granite in place of sandstone.
- (v) At a meeting held with the Secretary, NDMC, on 16 December 2011, it was decided that work for facade lighting should be executed in such a way as to avoid maintenance problem in future. EIL awarded two contracts for facade lighting work at a cost of ₹ 3.29 crore. During a joint survey with the officers from NDMC and EIL, it was found that LED lights in the floor and LED strips at upper *Jalies* were either not in place or broken in most of the blocks, electrical wirings were not in place and the system had become defunct. EIL stated (May 2015) that complete façade lightings in inner circle were handed over (February 2014) to NDMC, which did not maintain them.
- (vi) The contract for the work of surface development had two items for providing granite kerbs of *sindoori* red color or equivalent at the rate of ₹ 43,000 and ₹ 54,000 per cubic meter respectively. Audit scrutiny showed that EIL considered these items as extra items and made a payment of ₹ 1.99 crore at the rate of ₹ 68,981 per cubic meter. The cost of this item as per contracted rate works out to ₹ 1.30 crore, resulting in additional expenditure of ₹ 69 lakh. EIL stated (May 2015) that *rajshree* red granite stone was provided in place of *sindoori* red stone as directed

by NDMC. However, EIL did not produce documentary evidence in support of its contention and also did not mention the reason for the change in the specifications after award of the contract.

Thus, deficiencies in planning and implementation resulted in unfruitful expenditure of ₹ 4.84 crore as well as extra expenditure of another ₹ 3.38 crore.

2.1.3 Water supply system

Audit noted the following:

- (i) In order to address the issue of intermittent water supply in CP, the Council approved construction of a new underground water tank of 2,700 KL capacity and laying of a new water supply network to ensure 24x7 water supply. The proposed water tank was also to be used for water treatment and to supply water to Palika Bazar and Palika Parking. Audit scrutiny of records revealed that EIL incurred expenditure of ₹ 3.16 crore on laying a new water supply network. However, the proposed underground water tank could not be constructed because the land identified earlier for the underground water tank was not found feasible and NDMC failed to arrange any alternate land space for the same. The new network thus only connects to the existing underground old water tank and the objective for 24x7 water supply in CP, Palika Bazar and Palika parking remained unachieved.
- (ii) The Council approved an expenditure of ₹ 1.28 crore for an irrigation system in CP for maintenance of green spaces. Audit scrutiny revealed that EIL incurred ₹ 2.44 crore on two contracts during November 2009 to December 2012, for providing an irrigation system comprising of underground distribution lines and garden hydrants. However, this newly constructed irrigation system was not connected to any source of water and was lying idle. EIL informed (May 2015) that decision regarding location of water tank and source of water was not finalised by NDMC. Thus, laying the new irrigation system without ensuring availability of source of water resulted in unfruitful expenditure of ₹ 2.44 crore.

Audit observed that it was the responsibility of NDMC under the consultancy agreement to provide the requisite land for the works. Further, general principles of execution of works, as also stipulated in CPWD Works Manual adopted by NDMC require that encumbrance free site should be ensured before commencement of work. Failure of NDMC and EIL to ensure availability of site for all elements of water supply network before commencement of work resulted in unfruitful expenditure of ₹ 5.60 crore.

2.1.4 Firefighting system

The Council approved an expenditure of ₹ 9.50 crore for the firefighting system. As against this, EIL incurred an expenditure of ₹ 4.97 crore on a new

system including underground water tank and fire equipment. Audit scrutiny revealed the following:

- (i) 129 hydrant boxes were installed near fire hydrants across CP, all of these were damaged and rendered unserviceable as their doors were stolen. As a result, essential firefighting equipment to be placed in each hydrant box for use in case of fire emergencies (*viz.* six 15 m hose pipes and fire axe and other equipment) were not placed in these boxes, though such items were supplied by the contractor.



Empty and damaged Fire Hydrant Box

- (ii) Fire hydrants were to be provided with flow switches along with control wiring from these flow switches to the central control room for ascertaining the exact location of a fire. However, neither the control room was setup nor the flow switch, control wiring and indicating panel provided.
- (iii) A single head type hydrant valve to operate fire hydrants in case of fire emergencies was to be provided in each hydrant box. These valves were provided in chambers in the ground covered with mechanically locked covers. No tool or mechanism to remove the cover of underground chamber housing the valve was provided in the hydrant boxes. As such, possibility of operating these valves in case of fire was problematic. Further, there were multiple chambers covered with similar types of lid for other services such as telecommunication, water, electricity, sewerage, etc. situated around each hydrant. Since the chamber having valve to be used in case of fire to make the system operational is not marked distinctly, it would be difficult to identify the lid to be removed to operate the valve.

Hence, the efficacy of the works to augment fire fighting capabilities was not established despite expenditure of ₹ 4.97 crore.

2.1.5 Construction of service tunnel in middle circle

The DPR approved by NDMC provided for an expenditure of ₹ 71.21 crore for construction of underground service tunnel (corridor) below the middle circle having a height of 23 feet and width of 22 feet to be constructed by Open Cut Technology for placing the trunk water lines, telecommunication cables, irrigation pipeline, IGL pipelines, power cables and transformers with

a view to avoiding excavation for replacement of pipes and cables in future. It also provided for an expenditure of ₹ 70.40 crore for revamping of electrical, water, drainage and sewerage system in CP. The total cost approved for doing these works was ₹ 141.61 crore.

EIL invited common tenders in June 2009 for both these works. After pre bid meeting (June 2009) and on the request of a contractor, EIL changed the ‘Open Cut Technology’ to the costlier ‘Diaphragm Wall Technology’. A combined work was awarded at a cost of ₹ 236.70 crore in November 2009 (₹ 157.85 crore for the construction of the service tunnel and ₹ 78.85 crore for revamping of electrical, water, drainage and sewerage system).

As of May 2015, EIL had incurred ₹ 180.48 crore on construction of the service tunnel and an additional ₹ 12.47 crore on other items required to make the tunnel operational, which was not included in the cost approved by the Council. Thus, as against an allocation of ₹ 71.21 crore and contractual cost of ₹ 157.85 crore, EIL incurred ₹ 192.95 crore on service tunnel, due to change in technology and execution of unapproved items. Neither prior nor ex-post-facto approval of the Council was sought for the revised estimate and change in technology despite the huge increase in cost of 171 *per cent*.

Audit observed that, Clause 2.3.4 of CPWD works manual stipulates that material deviations that significantly alter the scope of work from the original sanction should not be made without the approval of the authority that accorded administrative approval to the work, even though the cost of the same may be covered by savings on other items. Further, under the consultancy agreement also, EIL was to periodically appraise NDMC regarding design, cost and program to achieve the best value for money in terms of technology, quality and operational performance. Further, at any stage during the execution of works, if it was felt that the work is not going as per the conceptual/re-development plan already approved by NDMC, the Council will have a right to intervene for corrective measures and decision will be binding on EIL. Given the higher escalation in cost involved, EIL should have referred the adoption of Diaphragm Wall technology to NDMC for acceptance before execution of the work.

2.1.6 Conclusion

The over-arching objective of the project was to restore the architectural and heritage character of CP while at the same time facilitating and easing traffic and pedestrian movement to improve the overall ambience and experience of the visitors to this premier commercial centre in the national capital. This objective could not be achieved. The scope of the project as envisaged in the original DPR was drastically reduced from ₹ 615.20 crore to ₹ 477.02 crore.

Even after delay ranging upto over four years in completion of the contracted works, restoration of the façade was completed only in the outer and inner circles while study to ascertain the structural stability of the buildings was not carried out. Facilities like subways, escalators, underground parking space and improvement of landscaping and lighting intended to ease both traffic and pedestrian movement and improve visitors' experience were not completed. Further, expenditure amounting to ₹ 14.67 crore was rendered unfruitful while extra expenditure of ₹ 3.38 crore was incurred in flooring of corridors and providing of kerbs. The efficacy of augmentation of fire-fighting capabilities done at a cost of ₹ 4.97 crore could not be assured in audit. The project is yet to be formally declared complete and accounts were yet to be closed (March 2016).

The matter was earlier referred to the Government and NDMC in September 2015 and again in May 2016; their replies were awaited (16 August 2016).

Directorate of Information and Publicity

2.2 Advertisement and Publicity Campaigns of the Government of National Capital Territory of Delhi

Test check of records of GNCTD brought out expenditure of ₹ 24.29 crore on advertisements and publicity campaigns that were not in conformity with the fundamental principles governing expenditure from public funds and the guidelines approved by the Hon'ble Supreme Court. Over 85 per cent of expenditure of ₹ 33.40 crore incurred in one specific publicity campaign pertained to advertisements released outside the NCT of Delhi which was beyond the responsibility of the GNCTD. Establishment of Shabdharth as a dedicated agency to handle advertisements and publicity campaigns of GNCTD did not result in any cost benefit. There was neither any prior assessment of necessary visibility or outreach nor any post campaign impact assessment. Weak expenditure controls and internal controls provided no assurance as to the comprehensiveness and accuracy of the expenditure incurred or liabilities created.

The Directorate of Information and Publicity (DIP) is responsible for informing and publicizing the programs, policies and activities of the Government of the National Capital Territory of Delhi (GNCTD) and looks after the publicity requirements of all its departments. As per guidelines for empanelment of newspapers/journals issued by DIP on 7 June 2007, all heads of departments have full powers to sanction expenditure at prescribed rates of Directorate of Advertising and Visual Publicity (DAVP) or DIP. However, they have to take administrative approval of the Hon'ble Chief Minister or authorities authorized by him and then get financial concurrence of Finance Department for incurring expenditure for advertisements at DIP's 'special rates' i.e. commercial rates. The guidelines reiterate existing instructions that all display ad-creatives in print and outdoor media and jingles or spots in radio or TV need prior approval of the Hon'ble Chief Minister before they are released. On 30 March 2015, DIP issued instructions that the designs are required to be put up to the Deputy Chief Minister through the Director Information & Publicity or the Principal Secretary (Public Relations) to the Deputy Chief Minister. In June 2015, the Delhi Government set up 'Shabdharth' as a society under the Societies Registration Act, 1860, that became the advertising agency through which all government advertisements were routed.

The Hon'ble Supreme Court, in its judgement dated 13 May 2015, approved the 'Guidelines on Content Regulation of Government Advertising' with a view to preventing arbitrary use of public funds for advertising without any attendant public interest. The apex Court enunciated five principles of content

regulation viz. (a) advertising campaigns should be related to government responsibilities, (b) advertisement material should be presented in an objective, fair and accessible manner and be designed to meet the objectives of the campaign, (c) advertisement materials should be objective and not directed at promoting political interests of ruling party, (d) advertisement campaigns should be justified and undertaken in an efficient and cost-effective manner, and (e) government advertising must comply with legal requirements and financial regulations and procedures.

In pursuance of the directions of the Hon'ble Court, the Union Ministry of Information and Broadcasting instructed all Ministries/agencies on 20 May 2015 to issue suitable directions to take note of all aspects of the judgement for compliance. DIP uploaded the Court's judgement on its website. GNCTD subsequently issued a circular on 3 August 2016 circulating the guidelines on content regulation approved by the Supreme Court for reference by all departments/autonomous bodies/corporations.

In order to ascertain whether expenditure on publicity and advertisements was being incurred economically, efficiently and effectively in accordance with general principles of financial propriety, audit test checked the records of DIP relating to advertisements released during the period from 1 April 2013 to 31 March 2016. In addition, audit selected five other departments² as well as the Delhi Jal Board (DJB) on the basis of number of advertisements released for audit scrutiny. The guidelines and principles approved by the Hon'ble Supreme Court were adopted as the benchmark for assessing and evaluating the expenditure incurred.

2.2.1 Budget and Expenditure

During the period 2013-15, DIP met the expenditure on advertisements out of the budget allotted under the head 'Other Charges' viz. ₹ 29.66 crore in 2013-14 and ₹ 20.23 crore in 2014-15. There was no allocation under the head 'Advertisement and Publicity'. For the budget of 2015-16, DIP proposed an allocation of ₹ 26.90 crore which included ₹ 20 crore for 'Other Charges' and the balance for salary and other recurring expenditure. However, DIP was allocated ₹ 500 crore under the head 'Advertisement and Publicity' and ₹ 22 crore under the head 'Other Charges' totaling ₹ 522 crore. This allocation was subsequently reduced to ₹ 100 crore in the Revised Estimates.

² Department of Education, Department of Environment, Department of Transport, Department of Health & Family Welfare and Public Works Department.

The Budget (Revised Estimates) and expenditure on advertisements during 2013-16 is in **Table 2.2.1.**

Table 2.2.1: Budget and Expenditure for Advertisement and Publicity

(₹ in crore)

Year	Budget (Revised Estimates)			Expenditure		
	DIP	Other Departments	Total	DIP	Other Departments	Total
2013-14	29.66	26.48	56.14	25.25	22.49	47.74
2014-15	20.23	21.65	41.88	11.12	16.31	27.43
2015-16	122.00	12.11	134.11	81.23	Not available	

Note: 1. Figures have been sourced from Detailed Demand for Grants under the head ‘Advertisement and Publicity’. Actual figure may be higher than that shown in the table as other departments had also incurred advertisement expenditure from other heads such as Office Expenses, Projects, Schemes, Programs, etc.

2. Figures of other departments include expenditure on publication of tenders, notices, etc. also.
3. Expenditure of DIP for 2015-16 also includes expenditure on tender and other notices.
4. RE for 2015-16 under DIP includes Other Charges of ₹ 22 crore.

Scrutiny of expenditure registers revealed that apart from the expenditure of ₹ 81.23 crore by DIP, a further amount of ₹ 20.23 crore was paid by DIP in 2016-17 for advertisements released in 2015-16 bringing the total expenditure on advertisements released during 2015-16 to ₹ 101.46 crore. DIP informed audit that there was also a committed liability of approximately ₹ 12.75 crore in respect of audio-visual advertisements released during 2015-16. The details of committed liability in respect of print and outdoor media were not provided by DIP though requested for. Thus, the actual cost of advertisements released during 2015-16 may go beyond ₹ 114.21 crore.

2.2.2 Content of publicity material

2.2.2.1 Projecting personality/party in publicity campaigns

The Guidelines on Content Regulation of Government Advertising stipulate that advertisement material should be objective and not directed at promoting political interests of the ruling party. It further stipulates that government advertising shall maintain political neutrality and avoid glorification of political personalities and projecting a positive impression of the party in power or a negative impression of parties critical of the government. It adds that advertisement material must not mention the party in government by name or include party political symbol, logo or flag.

Test check of advertisements and television clips (**Annexure**) brought out the following:

- (i) DIP approved in June 2015 the telecast of a TV clip of 120 seconds duration in 14 news channels for a period of seven days from 16 June 2015 at a cost of ₹ 1.74 crore. In the same month, DIP approved another TV clip to inform the general public about increase in the Education Budget, the Education Loan Guarantee Scheme for students in Delhi and the concern of the government for education. This TV clip of 90 seconds was approved to be telecast on 18 news channels from 9 July 2015 for a period of seven days with 60 spots a day. The period of telecast of this TV clip was extended for 10 more days i.e. up to 25 July 2015 and two more news channels were added to the previously approved 18 channels. The total expenditure incurred on telecast of this TV clip was ₹ 5.38 crore. Both these TV clips referred to the “Delhi Government” as *“Kejriwal Sarkar”* and refers specifically to “Kejriwal” at a number of places attributing achievements of the Government to his personal endeavors.
- (ii) During August and September 2015, DIP launched a media campaign through 13 creatives displayed at sites like bus queue shelters, public utilities/garbage dumps, unipoles, bill boards, railway bridges, inside metro trains, media screens and rent free sites. Audit observed that all the creatives included the caption line *“Kejriwal Sarkar ke 6 mahine”* (six months of Kejriwal government). The records relating to payments made to only three out of the 23 agencies were made available to audit. An amount of ₹ 95.51 lakh was sanctioned to these three agencies. The total expenditure incurred on this campaign could not be worked out as records of payments made/due to the remaining 20 agencies were not made available to audit.
- (iii) Government approved (12 February 2016) publishing of advertorials (two full pages each on 14, 15, 16 and 17 February 2016) in 26 national newspapers and 37 regional newspapers in 14 States. Nine TV clips were also approved for telecast on 89 TV channels including regional language channels of other States as well as seven radio jingles for broadcast on seven FM channels. The TV clips were telecast for seven days between 15 February and 1 March 2016 and radio jingles were broadcast between 13 and 19 February 2016. The total expenditure incurred on the campaign was ₹ 33.40 crore. Test check of expenditure of ₹ 15.50 crore brought out the following:
 - (a) In the advertorial published in ‘Dainik Jagran’ in different editions from 30 cities on 14 February 2016, the text of the article read *‘Aam Admi Party Sarkar ne shiksha ke budget ko doguna kar racha itihaas’* (Aam Admi Party Government made history by doubling the budget for education);

- (b) In the advertorials published in ‘Hindustan Times’ on 14 to 17 February 2016, Delhi Government was almost invariably referred to as ‘AAP Government’ or simply ‘AAP’;
 - (c) ‘Daily Excelsior’ of 29 February and 1 March 2016, a newspaper published from Jammu, carried the heading of the page, as - *‘First year success of AAP Government’*;
 - (d) Similarly, the advertorial released in February 2016 contained critical comments on the Central Government and other State Governments. The advertorial alleged that Central Government misused government machinery and an agency to suppress financial irregularities committed by them while the same agency was used to implicate Delhi Government and the office of the Chief Minister;
 - (e) One TV clip shows a person in a group of people waving a broom which is the political symbol of a political party while the display on the screen in Hindi says “*Yeh hai AAP ki Sarkar, Pehla Saal Bemissal.*” The caption (slogan) is written in Hindi except the word “AAP” which is in English. It also shows a procession with a banner displaying “*Aam Admi Party*”. The term “AAP” evidently signifies the political party;
 - (f) In another TV clip, improvement in the education in Government schools was claimed to have been brought about by “*Kejriwal Sarkar*;”
 - (g) In two other TV clips, Delhi Government was referred to as “*Kejriwal Sarkar*;”
 - (h) Another TV clip refers to specific achievements of “Aam Admi Sarkar” and reference is made to hurdles faced by the government and seeks to project the Central Government and Delhi Police in a negative light; and
 - (i) Similarly, radio jingles relating to educational facilities, compensation to farmers for crop damage, odd-even scheme, medicines and tests in government hospitals and reduction in electricity and water bills refer to “*Kejriwal Sarkar*”
- (iv) Further, as part of an advertisement campaign on “Safety of Women,” a TV clip of 105 seconds duration was telecast for seven days from 21 to 27 July 2015 at a cost of ₹ 71.65 lakh which attempts to project the Central Government and the Delhi Police in a negative light as responsible for “deteriorating law and order situation in Delhi.”

The expenditure incurred on the above advertisements and publicity campaigns that were not in conformity with the guidelines as brought out during the test check was ₹ 24.29 crore.

The Directorate stated (July 2016) that the audit observation was subjective and that ‘Kejriwal Government’ was simply a nomenclature used by the public and the media to refer to the Delhi Government which was used for effective communication. It added that the expression ‘AAP Government’ refers to the ‘Delhi Government’ and is only about the achievements of the Delhi Government. Regarding the negative comments, the Directorate cited various observations/remarks of Courts/media relating to crime against women and role of Delhi Police to assert that the law and order situation in Delhi had worsened. Insofar as mention of the Central Government was concerned, the Directorate stated that it was a political issue between two legally constituted governments which was put before the public and there was no targeting of any other political party.

Audit observed that advertisement and publicity campaigns that are funded from the public exchequer should be to inform the public of their rights, obligations and entitlements as well as to explain government policies, programs, services and initiatives. Advertisements that attribute the achievements of Delhi Government to personalities and include specific written, pictorial and visual reference to a political party or its symbol are evidently directed at promoting the political interests of a political party and were contrary to the fundamental principles governing expenditure from public funds as well as the guidelines approved by the apex Court. Content relating to other governments cannot be said to be politically neutral or free of political argument and partisan standpoint as they tended to project a positive impression of the party in power and a negative impression of parties critical of the government.

2.2.2.2 Non-verifiable content in advertisements

The Guidelines state that contents of advertisement must enable the recipients of the information to distinguish between facts and analysis and where information is presented as a fact, it should be accurate and verifiable. Audit observed the following:

- (a) TV clips telecast in February 2016 asserted that three bridges were completed at a cost that was less than the estimates by about ₹ 350 crore. Audit requested the Public Works Department for details of the projects and expenditure incurred. However, no details were provided. In response to the draft report, Government stated (July 2016) that there was a saving of ₹ 347 crore in construction of three bridges (Mangolpuri to Madhuban Chowk, Madhuban Chowk to Mukarba Chowk and Prembari Pul to Azadpur) when compared to the sanctioned cost. Of these, one bridge had been completed on 25 January 2016 while “minor items of work” were in progress in respect of the remaining two bridges. The remaining works included widening/strengthening of roads, construction of service road, footpath, drain, street lights, etc. The total expenditure projected was only an “assessment” and was not the actual expenditure incurred.

Audit observed that two of the three bridges were yet to be fully completed though they had been opened to traffic and the projected savings was admittedly based on an assessment and not on actual expenditure. The cost of the balance works were not informed to Audit. In the absence of the project records that detail the item-wise sanctioned cost and the expenditure actually incurred, Audit is unable to verify the accuracy of the savings asserted in the advertisements.

- (b) One of the TV clips telecast in February 2016 also stated that earlier one dispensary used to be built at ₹ 5 crore whereas similar dispensary was now being built at cost of ₹ 20 lakh. However, the relevant file in DIP contained neither any evidence in support of the claim made in the TV clip nor any documents indicating that the contents were provided by the respective department. In response to an audit query, the Directorate of Health Services (DHS) stated that no new dispensary was constructed during the year 2015-16. Thus, there was no basis for comparison of cost of dispensaries built earlier and those built now. As such, the claim relating to construction of dispensaries at a lower cost was not verifiable.

2.2.2.3 Inclusion of photographs of Ministers in advertisements



in lieu of the photograph of the Chief Minister, the photograph of the departmental (Cabinet) Minister/Minister in charge of the concerned Ministry may be published, if so desired.



The Guidelines stipulate that government advertisements should avoid photographs of political leaders and if it is felt essential for effective government messaging, only the photographs of the President/Prime Minister or Governor/Chief Minister should be used. Subsequently, the Hon'ble Supreme Court stated on 18 March 2016 in a review petition that



DIP released three advertisements on 31 March 2016 in newspapers of Delhi regarding inauguration of Aam Aadmi Mohalla Clinics, inauguration of scheme to grow tree on the side of roads, opening of Ashram Loop Sun Dial Park, Sarai Kale Khan and loop at Silver Oak Park, Jungpura. Audit observed that photographs of Hon'ble Deputy Chief Minister and Hon'ble Minister (PWD) were included in the advertisements in addition to that of the Chief Minister. Since the guidelines envisaged display of photograph of either the Chief Minister or the Minister concerned in lieu of that of the

Chief Minister, inclusion of the photographs of Hon'ble Ministers in addition to that of the Hon'ble Chief Minister was contrary to the guidelines.

2.2.3 Identification of target population

One of the fundamental principles underlying the guidelines was that publicity and advertisement campaigns must serve specific objectives and the content of advertisements should be relevant to the government's constitutional and legal obligations as well as the citizens' rights and entitlements. This pre-supposes that the target audience/section of the society be identified and the campaign be tailored to target this identified population in the most cost effective manner.

Audit observed that no such exercise had been undertaken while designing the campaign or selecting media. There was blanket coverage in print, electronic and outdoor media without any analysis of the visibility/outreach required. In smaller campaigns which include only one of the media, the selection of newspapers was made randomly except in one instance of chat shows aired on TV/radio in the year 2013-14. Selection of media without identifying the targeted audience or the visibility of media to such targeted audience provided no assurance as to the effectiveness of the advertisement campaigns.

Further, the responsibility of a particular government is towards the public of that particular State/Union Territory. Out of the total expenditure of ₹ 33.40 crore incurred on the publicity campaign cited in para 2.2.2.1(iii) above, ₹ 28.71 crore (*86 per cent*) was incurred in releasing advertisements outside NCT of Delhi as in **Table 2.2.2** below.

Table 2.2.2: Details of Expenditure on advertisements in other States

(₹ in crore)

Media	Newspapers/TV channels/Radio channels	Records provided in respect of payments made	Total expenditure	Expenditure pertaining to Delhi	Expenditure pertaining to other States/Cities
Print	26 National newspapers and 37 regional newspapers	11 National newspapers and 30 regional newspapers	24.04	2.76	21.28
TV	3 agencies covering 98 channels	Two out of three agencies	7.86	1.30	6.56
Radio	7	7	1.50	0.63	0.87
		Total	33.40	4.69	28.71

The actual figure is likely to be higher since this figure does not include expenditure on advertorials in 15 mainstream newspapers, seven regional newspapers and TV clips released through 'Shabdharth.'

The Directorate stated (July 2016) that there was immense potential to promote tourism, trade and retail businesses in Delhi and generate large

scale employment. The achievements made in critical sectors such as health, education, water supply, etc. were highlighted to attract businesses, best talent, best doctors, best engineers and best teachers to the national capital.

The reply is not tenable as the advertorials, TV clips and jingles depicted the achievements of the Delhi Government as that of a political party and the advertisements were not linked to GNCTD's constitutional and legal obligations towards the citizenry of NCT of Delhi or of informing the populace of NCT Delhi of government schemes and initiatives.

2.2.4 Effectiveness of advertisements

The guidelines stipulate, *inter alia*, that it should be the policy of governments to use public funds in such a manner so as to obtain maximum value for taxpayers' money.

While releasing advertisements for telecast on TV channels under four advertisement campaigns³ in May to July 2015, DIP stipulated that the clips should be telecast between 8.00 AM and 11.00 PM. Audit noted from the telecast certificates submitted by the agencies that some of the clips were telecast even before 7.00 AM though the total number of telecast per day was kept as mentioned in the release orders. Audit observed that viewership is likely to be lower during time slots before 7 AM thereby reducing their impact and cost effectiveness. The expenditure incurred on these advertisements was ₹ 29.64 lakh.

The Directorate assured (July 2016) that the audit observation had been noted for future compliance.

2.2.5 Absence of post-campaign impact assessment

The guidelines provide that in case of large volume advertisement campaigns, post-campaign impact assessment is necessary to be included in the planning process itself which should identify the indicators to measure success when the campaign has ended. Audit scrutiny revealed that neither was post-campaign impact assessment included in the planning process for advertisement campaigns nor was it conducted after the advertisement campaigns were over.

2.2.6 Setting up of 'Shabdharth'

The proposal for the setting up of Shabdharth submitted to the Delhi Council of Ministers brought out that DIP was completely dependent on empaneled private advertising agencies which deprived the Delhi Government of the 15 *per cent* discount that is offered by the media since the discount was retained by the

³ Advertisement campaigns on Electricity tariff, Women Safety, Increase in Education Budget and Completion of 100 days of Delhi Government.

agencies. It proposed that the agency may be allowed to retain *5 per cent* of the discount to meet its expenses and become self-sustaining and Government can still avail of *10 per cent* discount. It was also proposed that a loan of ₹ 50 lakh may be provided to Shabdarpth to meet its set up and operational expenses which was to be repaid in five years.

The Cabinet approved (16 April 2015) the setting up of Shabdarpth with the change that the entire *15 per cent* discount may be retained by Shabdarpth and the ₹ 50 lakh be given as a one-time grant instead of loan.

Shabdarpth subsequently commenced functioning from August 2015 under the chairmanship of the Minister in charge of Information and Publicity of NCT of Delhi. It was provided space and office facilities in the DIP building. The Memorandum of Association of Shabdarpth stated, *inter alia*, that its objective was “Publications and production of print, outdoor TV/radio/other electronics productions and creatives pertaining to the activities, policies, programs and achievements of GNCTD and its communications with citizens.

Audit observed that the changes from the proposal approved by the Council of Ministers allowing Shabdarpth to retain *15 per cent* discount negated the financial benefit that had been put forward in the proposal as justification for the establishment of the society.

Audit further noted that at a meeting chaired by Secretary (Public Relations)/DIP on 9 February 2016 with marketing representatives of mainstream print media relating to the publicity campaign that was to be launched in that month, the newspapers were instructed to submit drafts of the advertorial for approval of the competent authority. Subsequently, DIP released ₹ 24.04 crore to Shabdarpth for the advertorials that were published in 26 national and 37 regional newspapers from 14 to 17 February 2016. This included a discount of ₹ 4.04 crore to Shabdarpth in respect of 11 national and 30 regional newspapers. Bills of remaining newspapers were not made available to Audit. The bills submitted by the newspapers provided for a discount of *15 per cent*. However, Shabdarpth added the discount back in the bills submitted by it to DIP. Since the work of designing and creatives were done in this instance by the respective newspapers, there was no justification for payment through Shabdarpth and for the society to avail of the discount.

The Directorate stated (July 2016) that Shabdarpth performed all activities relating to release, billing and payment for advertisements. It added that even if the Directorate had released the advertisements, it would not have saved commission as it was between newspapers and the agency. The reply is not tenable as the agency discount in this case would have been available to DIP had it released the advertorials directly to newspapers.

2.2.7 Lack of budgetary control

GFR provides that due approvals of the competent authority should be obtained before incurring expenditure. This involves making an estimate of the expenditure which should be apprised to the sanctioning authority in order to enable him to accord an informed sanction. DIP issued instructions on 30 March 2015 to all departments to include the estimated total cost of the campaign, cost break up, discount offered by the agencies, etc. while seeking approval of the competent authority for advertisements to be released.

Examination of records in DIP revealed that proposals relating to eight advertisement campaigns involving an expenditure of ₹ 33.46 crore were submitted to and approved by the competent authority during 2015-16 though their estimated cost were not worked out nor brought out in the proposal submitted to the competent authority. Thus, there was no way for the competent authority to know the quantum of expenditure being authorized nor any mechanism to ensure availability of sufficient funds to meet the liability.

Similarly, Directorate of Higher Education (DHE) and Directorate Health Services also accorded approval for advertisements without the availability of estimated cost. The actual expenditure by these two Departments was ₹ 27.02 lakh in 10 cases and ₹ 1.05 crore in 11 cases respectively during 2013-15.

Releasing advertisements without assessing the expenditure involved violated the fundamental norms of expenditure control and amounted to creating liabilities without reference to budget allocations or funds availability.

The Directorate stated (July 2016) that budgetary allocation was always kept in mind before releasing advertisements. It added that DIP had reiterated Standard Operating Procedures in June 2016 to all departments/autonomous bodies/corporations of GNCTD to include the estimated cost of each advertisement in the proposal for administrative approval. However, the fact remained that proposals involving expenditure of ₹ 34.78 crore was submitted and approved without the competent authority being apprised of the financial implications and expenditure outgo of the proposal.

2.2.8 Lack of internal control

Internal controls are safeguards that are put in place by the management of an organization to provide assurance that its operations are proceeding as planned. These are also designed to provide reasonable assurance that the entity's general objectives are being achieved. Reasonable assurance provided by such internal controls strengthens accountability of public authorities. Audit noticed general weaknesses in maintenance of records as detailed below:

- a) Improper maintenance of Registers: DIP maintains a year-wise Advertisement Register for print media advertisements published through different advertisement agencies. The register contains columns viz. DIP No., name of newspapers, type of advertisement (display/classified/tender notice/public notice) and name/address of the department. DIP also maintains an Expenditure Register for print media for payment of bills raised by advertisement agencies against the advertisement published, in which details of payments such as file number, occasion, issued by, name of firm/newspapers, bill number and date, amount, etc. are recorded. Audit observed that there was no link between the two registers in the absence of which Audit could not ascertain whether payment against all the advertisements released during a year had been made and whether there remained any outstanding liability.
- b) Non-maintenance of registers for outdoor campaigns and audio visual media: DIP was not maintaining any release order register for outdoor media and electronic media advertisements although an expenditure register was being maintained in which payment details are recorded. As a result, the number of advertisements released and whether bills against advertisements released had been received and payments made there against could not be ascertained.

The Directorate stated (July 2016) that in most of the instances, due to paucity of time, it was not viable to ascertain the estimated cost of advertisements. Further, the Directorate is fully aware of the budget and did not exceed the budget allocation. The reply is not tenable as such registers constitute primary instruments necessary for effective internal control and monitoring of expenditure and their improper or non-maintenance is fraught with the risk of double payments.

2.2.9 Conclusion

Advertisements and publicity campaigns funded from the public exchequer should be related to the Government's responsibilities and be explicitly directed at informing the public of the State/Union Territory concerned of the government's policies, programs, services and initiatives. Test check brought out that expenditure of ₹ 24.29 crore was incurred on advertisements and publicity campaigns that were not in conformity with the generally accepted principles of financial propriety or the guidelines on content regulation approved by the Hon'ble Supreme Court. Over 85 *per cent* of expenditure of ₹ 33.40 crore incurred in one specific publicity campaign pertained to advertisements released outside the NCT of Delhi which was beyond the responsibility of the GNCTD. There was no prior exercise to identify target audiences or necessary visibility or outreach nor was there any post-campaign impact assessment.

While Shabdharth was established with the stated objective of economizing expenditure on advertisements, this was not achieved. Lastly, non-adherence to extant instructions relating to inclusion of cost estimates in proposals for release of advertisements/publicity campaigns while seeking approval of the competent authority coupled with improper or non-maintenance of necessary registers undermined expenditure control and provided no assurance as to the comprehensiveness and accuracy of the expenditure incurred and liabilities created on advertisements and publicity.

The matter was referred to the Government on 8 July 2016; their reply to the report was awaited (16 August 2016).

Althetredby

New Delhi **(DOLLY CHAKRABARTY)**
Dated : 21 August 2016 **Principal Accountant General (Audit), Delhi**

Countersigned

[Signature]

New Delhi **(SHASHI KANT SHARMA)**
Dated : 22 August 2016 **Comptroller and Auditor General of India**

Annexure

Annexure

Extract of contents of advertisements/snapshots from TV clips (Referred to in Paragraph 2.2.2.1)

Paragraph 2.2.2.1(i)

(a) TV Clip telecast in June 2015

A voice in the background says - “*Roj TV dekhte hai to aisa lagta hai jaise saare beiman ikatthe ho gaye. Kejriwal ke haath dhokar peechhey pade hai*” (While watching TV daily, it seems that all dishonest people have joined together and are after ‘Kejriwal’) and prays - “*Roz Bhagwan se dua mangti hoon, Bhagwan hamare Arvind ko salamat rakhen*” (Every day I pray to God to keep ‘our Arvind’ safe).

(b) TV Clip telecast in July 2015

“*Bhrastachariyon ki sajishon ke bawzood, ‘Kejriwal Sarkar’ ne racha itihaas,*” (despite conspiracy hatched by corrupt, Kejriwal Government made history) and “*Ye hai Kejriwal Sarkar ka vada, jo kaha vo kiya*”(This is the promise of Kejriwal Government, as said as done).

Paragraph 2.2.2.1(iii) (d)

Extracts from advertorial appeared in ‘Daily Excelsior’ dated 1 March 2016

Officers harassed, CBI misused to cripple governance

(First four paragraphs of the advertisement are reproduced below)

“In a blatant misuse of Central Bureau of Investigation (CBI), BJP lead Central Government unleashed the agency (CBI) on the AAP ruled Delhi Government apparently to protect Finance Minister Arun Jaitley who was at the centre of a row over alleged financial irregularities in the Delhi and District Cricket Association.

Around 9 AM, on December 15, CBI officials walked into the Delhi Secretariat and after nearly 20 minutes, the investigators were in the office of the Delhi Chief Minister’s Principal Secretary Rajender Kumar which is situated in the premises of the CMO. The CBI sleuths sealed the entire floor.

What was shocking in all was the fact that when the CBI was so active in raiding the office of the Delhi Chief Minister, there was a conspicuous silence on some other important cases like Vyapam in BJP ruled Madhya Pradesh and Lalitgate in Rajasthan in which BJP Chief Minister and some RSS members are believed to be involved.

The CBI proceeded and acted with unprecedented haste for the obvious reasons under undue political pressure. So far the agency has not been able to explain the relevance of the documents pertaining to Delhi Government which are totally unrelated for the purpose of investigating either before the trial court or before the high court but were seized indiscriminately by the CBI on December 15, 2015 from the office of the Chief Minister under the garb of search warrants. It is also pertinent to mention that CBI could not file any FIR against Kumar and released him after several hours of questioning for three days.”

Paragraph 2.2.2.1(iii)(e)

Snapshots from TV clips telecast in February 2016

- (i) A person waving a broom which is the symbol of a political party



- (ii) Caption displayed in a TV clip



- (iii) Procession with a banner saying ‘Aam Admi Party’



Paragraph 2.2.2.1(iii) (h)

TV clips telecast in February 2016

A voice in the background says



"Lekin unhone adchane lagaane me koi kasar nahi chhodi" (But they did not spare any efforts to create hurdles) and show a procession of people carrying a placard displaying "*Outraged - Brutality by Delhi Police*".

The clip also contained comments as:

"Kendra Sarkar ne central force bhej kar Dilli Sarkar ki Anti-Corruption Branch par kabza kiya. Mukhyamantri ke daftar par CBI ke chhape dalvaye"

(Central Government took over Anti-Corruption Branch of Delhi Government by sending Central Forces. Got CM's office raided by CBI).

Paragraph 2.2.2.1(iv)

TV clips telecast in February 2016

A voice says that

- *"Abhi kuchh din pehle Dilli me ek ladki ko sare aam 32 bar chakoo se god-god kar mar dala gaya"* (Just few days back, a girl was publicly stabbed 32 times and murdered in Delhi).
- *"Main aur Manish us ladki ke parivaar walo se milne gaye the"* (I and Manish met the family of the girl).
- *"wahan par log bahut dare hue hain. Unka kehna hai ki roz door door kahin bhi police dikhaayi nahi deti"* (People there are frightened and say that police is not seen anywhere near the place).
- *"Dilli me is kism ki ghatnayen lagataar badhti ja rahi hain"* (In Delhi, such incidents are increasing continually).
- *"Kanoon vyavastha charmara gayee hai"* (The law and order have collapsed).
- *"Khaastor par mahilayaen apne aapko bahut asurakshhit mahsoos karne lagi hai"* (Especially women feel insecure).

This was followed by an appeal to the Prime Minister as:

"Main desh ke Pradhanmantri se hath jodkar appeal karna chahta hoon. Sir, aap to jaante hain, Dilli Police par Dilli Sarkar ka kisi tarah ka koi control nahi hai. Kanoonan Dilli Police seedhe aapke under me aati hai. Aap uske liye bilkul time nahi de pa rahe hain. Aap to desh ke Pradhanmantri hain. Aapko poora desh sambhana hai, isliye Dilli Police poori tarah se nirankush ho chuki hai, us pe kisi ka control nahi bacha hai. Sir, aisa nahi hai ki police wale kharaab hain, unkaa system hi kharaab hai. Vo log to khud bahut dukhi

hain. Sir, meri aap se ek chhoti si vinti hai. Vinamra vinti hai, ya to aap har haphte kam se kam ek ghanta Dilli ki kanoon vyavastha ke liye nikala keejiye. Dilli Police ki javab dehi tay kiya keejiye. Yaa phir Dilli Police ka control aap hamein de dee jiye, janta ke sath milkar hum Dilli Police ki vyavastha ko thheek karenge. Aur haan, jahan Meenashi ka katal hua thha, Anand Parvat pe, vahan ke log bahut dare hue hain. Please, vahan par police ka uchit bandobast kara deejkiye. Shukriya”.

(I wish to appeal to the Prime Minister of the country with folded hands. Sir, as you know, Delhi Government has no control over Delhi Police. As per law, Delhi Police directly falls under you but you are unable to give time for Delhi Police. You are the Prime Minister of India and you have to take care of the whole nation and therefore, the Delhi Police is totally out of control. It is not that the police personnel are incompetent, but the system is not good. They are unhappy themselves. Sir, I have a small request that either you devote at least one hour for law and order in Delhi and fix responsibility of Delhi Police or hand over control of Delhi Police to us. We will rectify the system of Delhi Police in cooperation with the people. And yes, please arrange police presence in Anand Parbat area where Meenakshi was murdered as the people are very frightened. Thank you).

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