

CHAPTER 9

MONITORING OF ENVIRONMENTAL ACTIVITIES

9.1 Environment Management Cell

A mine can be started after obtaining various clearances and permissions from different statutory bodies. Once the mining activities are made operational, various pollution control and mitigation measures and other activities are required to be undertaken as per the EMP, EC, FC and CTE and CTO. To ensure that the compliance mechanism is fully and effectively operational, it is necessary that the mitigation measures required for control of pollution are appropriately monitored at different levels. Environment Management Cell plays an important role in this regard.

9.1.1 MoEF&CC, while granting EC to projects, stipulated a separate Environment Management Cell (EMC) comprising of qualified personnel directly reporting to the HQ to be set up. Accordingly CIL and subsidiaries set up EMCs.

In CIL, we observed that, while deployment of Executives⁵³ exceeded the sanctioned strength at HQ in all the years, it fell short in its mines, during the period 2013-18 as detailed below:

Table 18: Deployment of Executives in CIL HQ and NEC Mines

Year	CIL HQ		NEC mines ⁵⁴		Total		Percentage of excess/shortage(-) with respect to sanctioned strength	
	Sanctioned strength	Men in position	Sanctioned strength	Men in position	Sanctioned strength	Men in position	HQ	Mines
2013-14	5	7	2	0	7	7	40	(-)100
2014-15	5	6	3	2	8	8	20	(-)33
2015-16	5	6	3	2	8	8	20	(-)33
2016-17	5	8	3	1	8	9	60	(-)67
2017-18	5	11	3	2	8	13	120	(-)33

From the above, it is evident that deployment was skewed towards CIL HQ. While excess deployment was observed in CIL HQ, NEC mines experienced shortage of Executives.

⁵³ Qualified personnel deployed as Executives as per EC stipulations.

⁵⁴ 4 mines of North Eastern Coalfields under the control of CIL

CIL justified (November 2018) the deployment of Executives in excess of the sanctioned strength in its HQ on the plea that the scope of work considerably increased over the years and that the incumbents handled other assignments not related to environment also. The reply confirms the fact that CIL did not rationalise its manpower requirements to keep pace with its increased responsibilities and reassessed the sanctioned strength. Further, the manpower was always deficient in the mines/projects and was not proportional to the increased scope of work, thus having an adverse impact on monitoring environmental activities, as discussed in preceding paragraphs.

9.1.2 We observed inconsistencies in deployment of manpower for environmental activities in the seven subsidiaries of CIL as depicted in the following table:

Table 19: Deployment of Executives in Subsidiary HQs and Mines (March 2018)

Sl. No.	Subsidiary	Sanctioned strength			Actual deployment			Variation ⁵⁵	Percentage of excess deployment
		HQ	Mines	Total	HQ	Mines	Total		
1	BCCL	NA	NA	NA	12	27	39	-	-
2	CCL	NA	NA	29	8	13	21	(8)	-
3	ECL	NA	NA	33	9	21	30	(3)	-
4	MCL	3	32	35	9	41	50	15	43
5	NCL	NA	NA	5	8	17	25	20	400
6	SECL	8	17	25	5	25	30	5	20
7	WCL	NA	NA	10	11	21	32	22	220

While BCCL did not assess and fix the sanctioned strength of Executives required for its environmental activities either in the HQ or in the mines, four⁵⁶ other subsidiaries did not assess the strength of Executives required for deployment in the mines. Separate sanctioned strength for the HQ and mines were available in MCL and SECL. In MCL, deployment of Executives in the HQ (9) and in mines (41) exceeded the respective sanctioned strength by 200 per cent and 28 per cent respectively. In SECL, deployment of Executives in the HQ (5) fell short of the sanctioned strength by 38 per cent while at mines (25) it exceeded the sanctioned strength by 47 per cent. The overall excess deployment of Executives in four subsidiaries ranged between 20 per cent and 400 per cent of their sanctioned strength. These are indicative of the fact that the subsidiaries also did not assess their manpower requirements rationally and there was no uniform policy for deployment of manpower in the EMC.

⁵⁵ Figures in the brackets indicate shortage in deployment

⁵⁶ CCL, ECL, NCL and WCL

The subsidiaries stated (October / November 2018) that the tasks under the Environment department were multi-disciplinary in nature and hence manpower of other disciplines was utilised. The reply confirms the fact that the sanctioned strength of Environment department required rationalization. The subsidiaries further stated (November 2018) that action would be taken to rationalise the sanctioned strength. Further developments are awaited (November 2018).

9.2 Absence of adequate monitoring mechanism

MoEF&CC, through its EC conditions, directed from time to time that to ensure proper checks and balances the subsidiaries need to have well laid down system of reporting.

Audit observed from the records of MCL and NCL that the reports prepared by CMPDIL based on the samples taken from the mines were forwarded to the subsidiary HQ and concerned Area Offices. In case of any abnormal deviations found in the report, necessary instructions were communicated by the subsidiary HQ to the concerned Area Office for taking necessary remedial measures. However, such records for taking actions based on the reports of CMPDIL were not found available to audit in other subsidiaries of CIL.

We also observed that while the quality parameters relating to air and water were being monitored on fortnightly basis, the reports were prepared by CMPDIL and reported to the subsidiaries on quarterly⁵⁷ basis, thereby offering no scope for initiating remedial measures on the basis of adverse quarterly readings recorded.

We further observed that third party audit of environment department was not conducted for evaluation of its environmental activities. Besides, several good practices which were in vogue in some subsidiaries were not disseminated for adoption by the other subsidiaries. Further, the general superintendence exercised by CIL on the subsidiaries and by the subsidiary HQs on the mines in the field of manpower deployment, project monitoring and adherence to environmental norms / stipulations was also not found uniform and effective.

We observed weaknesses in the monitoring mechanism as regards adherence to pollution control measures, execution of works, mitigation of identified threats and safety measures as discussed in paras 4.1, 4.2, 4.4, 4.6, 4.9, 5.10 and 6.2 *supra*.

⁵⁷ In MCL, it is on monthly basis.

Audit Summation

The deployment of Executives exceeded the sanctioned strength at CIL Headquarters in all the years but it fell short at mines, during the period 2013-18. There were inconsistencies in deployment of manpower for environmental activities in the subsidiaries also. Further, though the quality parameters relating to air and water were being monitored on fortnightly basis, the reports were prepared by Central Mine Planning and Design Institute Limited and reported to the subsidiaries on quarterly basis, thereby offering no scope for initiating remedial measures on the basis of adverse fortnightly readings recorded. Besides, the general superintendence exercised by CIL on the subsidiaries and by the subsidiary HQs on the mines in the field of manpower deployment, project monitoring and adherence to environmental norms / stipulations was also not found uniform and effective.