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“Dharma is to protect the Needy”

Article on
SOCIAL COST-BENEFIT ANALYSIS OF ENERGY PROJECTS IN
THE LIGHT OF EIA FRAMEWORK IN INDIA

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ABSTRACT-

The concern regarding the impact of development projects on the environment has gained considerable momentum especially in the last decade and India has signed many international conventions and therefore is obliged to mitigate the environmental hazard risks that most of the energy development projects pose. However, a country cannot be expected to altogether stop the development of energy projects due to the adverse impact they have on the environment. Thus, the only way left is to regulate the development of these projects to maintain a harmonious relationship between economic development and the environment assessment. This task has been imposed upon the 'Environment Impact Assessment' framework. However, the EIA framework along with other legislation concerning the environmental protection have long been criticized by a section of people as being insufficient to cater the need for environmental protection and inclining more towards the economic development at any cost. Thus, there is a need to harmonize the economic development of the country and the protection of environment.

With this article, the author seeks to do an in-depth critical study of the EIA framework in India which comes into picture during the social cost- benefit analysis phase of any energy project planning and further suggest some of the ways in which energy project development can be brought in sync with the protection of the environment from degradation.

The first two sections of the article intend to develop an understanding of the concept of SocialCost- benefit Analysis and the Environment Impact Assessment. The subsequent sections focus on these issues with an Indian perspective and discuss the current legal framework around the environment regulations that the projects need to comply with.

A critical analysis of the draft EIA notification 2020 has then been done and issues and concerns have been highlighted. The article concludes by highlighting the specific concerns with regard to energy projects and suggests some of the ways in which economic growth can be harmonized with environment conservation.

SOCIAL COST- BENEFIT ANALYSIS- CONCEPT AND IMPORTANCE:

The term 'cost-benefit analysis' refers to a method of evaluation of a project or policy which has been developed. This evaluation is conducted with no regard to the possibility of the results of this analysis being considered as a decisive factor for carrying on the project further.¹

The term lacks any proper definition and instead refers to a method of evaluation as it has been developed from time to time keeping in mind the conceptual framework around the term as explained further.

Every decision taken or choice made has its impact on more than one stakeholder. The nature of this impact may be varied ranging from social, political, economic, or personal. Further, the impact being talked about may be either 'positive' or 'negative' depending upon the perspective. Therefore, it is not possible to undertake a policy, planning or any project in general without having a 'negative' impact. The way then to decide whether the project can be implemented or not is by doing a cost-benefit analysis of it. Here the term 'costs' in general refers to the 'negative' impacts; and the term benefit refers to the 'positive' impacts. Generally, a project is considered to be feasible if the benefits outweigh the costs.² In simple terms, if the benefits which the project would accrue outweigh the harms, it is worth developing the project further.

A social cost- benefit analysis is a systematic and scientific evaluation of the project which is focused on its social impact rather than the economic.³ Whenever a project has socio-economic impacts, the cost-benefit analysis done takes into account the impact it will have on the quality of society. These social cost and benefits are something which is in addition to the income generated by the project. It generally encompasses the impact the project would have on the environment, people, income, etc. The analysis in social cost- benefit analysis includes attaching a price or monetary value to the social impacts of the project to further calculate its net impact. Social cost- benefit analysis is done both by private as well as public projects proponents.

¹ Richard A. Posner, *Cost-Benefit Analysis: Definition, Justification, and Comment on Conference Papers*, 29 The Journal of Legal Studies 1153, 1154(2000).

² Amartya Sen, *The Discipline of Cost- benefit Analysis*, 29 The Journal of Legal Studies 931, 934(2000).

³ Natarajan P. et al., *Social Cost- benefit Analysis of Solar Power Projects*,

Social cost- benefit analysis serves as a major tool for investors and project sponsors to consider alternatives on the basis of the SCBA. It also helps in a comparative analysis of more than one project alternatives.

ENVIRONMENT, ENERGY PROJECTS AND SCBA-

The conflict between the environment and economic development has long been a matter of debate at the national as well as global level. While economic growth, global trade and business environment of a country have always been a matter of significance, the last few decades have witnessed a growing awareness regarding environmental issues which does not come as a surprise in the light of growing degradation of environment and its effect on human lives. However, environment and development need not always be in conflict and may also have a cause and effect relationship. For example, a country may be facing a shortage of clean water supply because of a lack of infrastructure development; similarly economic growth may enhance the degradation of the environment, for example, deforestation caused due to urbanization.⁴ Thus, the welfare economies have introduced a series of legislation and other regulations in order to serve as a tool for social cost- benefit analysis of any development project.

The SCBA with respect to the environment assumes more significance in case of energy projects as power plants deployed for conversion of a given form of energy into electrical one involves a direct exploitation of natural sources. Whereas the world is moving towards cleaner and more sustainable sources of energy from conventional ones, the effect on environment serves as a tool to choose the best among the available alternatives. Apart from this, the SCBA of an energy project has some additional advantages for the developers of the project which are as follows-

1- Carbon Trading-

Carbon trading is a trading system that is a product of India's international commitment to UNFCCC.⁵ In simple words, companies reducing the emission of carbon get credits in return which they can sell as a tradable commodity to those companies which exceeded the prescribed threshold for carbon emissions.⁶ This was conceptualized to motivate the business to involve in clean projects by providing them with financial

⁴ WORLD BANK, *WORLD DEVELOPMENT REPORT 1992*, (Oxford University Press 1992).

⁵ United Nations Framework Convention on Climate Change 1992.

⁶ NATIONAL INDIAN CARBON COALITION, <https://www.indiancarbon.org/the-carbon-credit-market/>, (last visited, May 22, 2021)

incentives. Currently, NCDX in India is a platform for carbon trading, and these carbon credits are being traded as future contracts.⁷

2- Renewable Energy Certificate-

These are market instruments issued to promote the use of renewable energy sources. When 1 MWh electricity is generated from a renewable source, 1 REC is created. According to the Renewable Purchase Obligation, a proportion is fixed which the large power procurers need to buy from renewable energy resources.

Thus, energy projects in India have significant potential for economic growth for the sponsors as well if they choose to pay due diligence to environmental aspects of their development and comply with the relevant regulations and this makes their SCBA even more important.

ENVIRONMENT IMPACT ASSESSMENT

The process of SCBA being based upon the impact of a project requires tools for its implementation. When the SCBA is to be conducted with reference to environment, then the tool which is commonly used to measure the effects on environment is Environment Impact Assessment (EIA). It forms an important part of the 'United Nations Environment Program' however there is no universal EIA framework as of now.

Convention on Biological Diversity (CBD) defines EIA as follows-

*"Environmental Impact Assessment (EIA) is a process of evaluating the likely environmental impacts of a proposed project or development, taking into account inter-related socio-economic, cultural and human-health impacts, both beneficial and adverse."*⁸

Similarly, the United Nations Environment Program (UNEP) defines EIA as-

*"..tool used to identify the environmental, social and economic impacts of a project prior to decision-making."*⁹

⁷ M. Ramesh, *Time to Step Up Carbon Trading*, THE HINDU BUSINESS LINE, (Nov. 17, 2020), <https://www.thehindubusinessline.com/specials/clean-tech/time-to-step-up-carbon-trading/article33119767.ece>.

⁸ CONVENTION ON BIOLOGICAL DIVERSITY, <https://www.cbd.int/impact/importance.shtml>, (last visited May 23, 2021).

⁹ *Id.*

The main objective of EIA is to predict the environmental consequences of a project in the planning phase itself which further helps in devising ways to mitigate the environment risks or choose the best alternative.¹⁰

The EIA has been adopted as a tool by almost all the countries who were the parties to UNEP including India. Despite the practice and methodology differing from country to country, there are some foundational steps which are common to all, these are as follows-

- 1- Screening- Screening determines whether the project needs partial or full EIA.
- 2- Scoping- It identifies the relevant impacts to be assessed, alternative solutions or designs to mitigate the effects etc.
- 3- Assessment and Evaluation of Impacts and Development of Alternatives- It identifies and predicts the likely impacts of the project on the environment and further identifies the better alternatives.
- 4- EIA Report- It is a summary of the assessment and also includes a plan for the implementation of alternatives or mitigating measures.
- 5- Review of Report- The report of the EIA is reviewed according to the procedure.
- 6- Decision making- Decision regarding the project is taken based on the SCBA. The project is generally approved if the benefits exceed the cost; however, its approval depends on other factors as well.
- 7- Monitoring, compliance, enforcement and environment auditing.

Thus, EIA is one of the most important appraisal tools whose results also serve as a foundation for further building of policy and planning whether by the state or other project developers. Currently, there is no other tool as efficient as EIA when it comes to appraisal of projects with respect to their SCBA.¹¹

LEGAL REGULATION CONCERNING IMPACT OF ENERGY PROJECTS ON THE ENVIRONMENT IN INDIA

CONSTITUTIONAL FRAMEWORK-

¹⁰ See *Supra* note 28.

¹¹ See *Supra* note 28.



Subject- matter of environment is found in the concurrent list in the seventh schedule of the constitution which implies that both the Central and state governments can legislate on it. Accordingly, there are a number of specific legislations dealing with pollution, deforestation, and hazardous waste, etc. Further, Article 21¹² of the Indian Constitution which declares Right to Life and liberty as a fundamental right has been expanded¹³ in its interpretation and includes right to a clean environment as well.¹⁴ Thus, a writ can be filed either in Supreme Court or a High Court against any degradation of environment which is hampering with the fundamental right to life and liberty. Similarly, Article 48A¹⁵ of the Constitution which forms the part of Directive Principles of State Policy directs the government “...to endeavor to protect and improve the environment..”.

Apart from the express constitutional provisions concerning environment, judicial activism too has played a significant role in developing the framework for environment protection in India. The Supreme Court has while deciding a range of environment related cases has laid down various governing principles which have to be followed while enacting legislations and regulations. These principles are, polluter pays principle¹⁶, principle of sustainable development¹⁷, precautionary principle¹⁸ and doctrine of public trust¹⁹, which together serve as governing principles for environment protection in India.

SPECIFIC LEGISLATION-

1- Environment (Protection) Act, 1986²⁰-

Before the enactment of this legislation, there existed already a number of acts dealing with environment complemented by various regulatory bodies. A need was felt to consolidate all the existed acts and regulatory bodies and have an umbrella legislation which would serve as a source for protection of environment and would fill the existed lacunae.²¹ Further, India had been a party to UN Conference on Human Environment 1972 which was held at Stockholm and was obligated to implement the decisions taken

¹² INDIA CONST. art. 21.

¹³ See *Maneka Gandhi v. Union of India*, AIR 1978 SC 597.

¹⁴ See *Subhash Kumar v. State of Bihar*, AIR 1991 SC 420.

¹⁵ See *Supra* note 8, art. 48A.

¹⁶ See *Indian Council for Enviro- Legal Action v. Union of India*, (1996) 5 SCC 281.

¹⁷ See *Vellore Citizens' Welfare Forum vs. Union of India and Others*, (1996) 5 SCC 647.

¹⁸ See *M.C. Mehta v. Union of India*, (1997) 3 SCC 715.

¹⁹ See *M.C. Mehta v. Kamalnath*, (1997) 1 SCC 388.

²⁰ The Environment (Protection) Act, 1986, No. 29, Acts of Parliament, 1986(India).

²¹ See *Id.*, Statement of Objects and Reasons.



therein.²²Hence, this act was passed in the year 1986 to serve both the purposes mentioned above.

The characteristic feature of this act is the delegation of very wide powers to the Central Government the most important of which is the rule- making power under section 6 and section 25. It is under this act only that the Environment Impact assessment has been made a statutory obligation and has to be undertaken for specified projects.

2- Water (Prevention and Control of Pollution) Act, 1974²³-

Commonly known as the Water Act, it was enacted as a response to the problem of increasing pollution of rivers and streams which was becoming a threat to human life as well as biodiversity and was being caused due to rapid urbanization and industrialization.²⁴ Its main purpose was to control the discharge of effluents from industries into the nearby water bodies. To have an integrated approach towards tackling the pollution, the act envisages the formation of a Central Pollution Control Board (CPCB) as well as State Pollution Control Board (SPSB) which consist of representatives of all the stakeholders.²⁵

3- Air (Prevention and Control of Pollution) Act, 1981²⁶-

Commonly known as the Air Act, it was enacted with an objective to curb the air pollution which was being caused due to industrialization and was continuously degrading the quality of environment.²⁷ The Boards which have been constituted under the Water act also perform functions and duties laid down under this act.

Apart from these chief legislations, there are a number of other acts such as the Forest (Conservation) Act, 1980²⁸; Wild Life (Protection) Act, 1972²⁹; Public Liability Insurance Act, 1991³⁰; National Green Tribunal Act, 2010³¹ which along with various rules and regulations and other statutory notifications form the entire legal framework around environment protection in India and obligate the industries to comply with their provisions.

²² *Id.*

²³ The Water (Prevention and Control of Pollution) Act, 1974, No. 6, Acts of Parliament, 1974(India).

²⁴ See *Id.*, Statement of Objects and Reasons.

²⁵ *Supra* note 19, § 3, § 4.

²⁶ The Air (Prevention and Control of Pollution) Act, 1981, No. 14, Acts of Parliament, 1981(India).

²⁷ *Supra* note 22, Statement of Objects and Reasons.

²⁸ The Forest (Conservation) Act, 1980, No. 69, Acts of Parliament, 1980(India).

²⁹ Wild Life (Protection) Act, 1972, No. 53, Acts of Parliament, 1972(India).

³⁰ Public Liability Insurance Act, 1991, No. 6, Acts of Parliament, 1991(India).

³¹ National Green Tribunal Act, 2010, No. 19, Acts of Parliament, 2010(India).



FRAMEWORK OF ENVIRONMENT IMPACT ASSESSMENT IN INDIA

HISTORY-

In India, the history of EIA dates back to 1967 when the Planning Commission asked the Department of Science and Technology to do an EIA of the river valley projects.³² At that time and until 1994, EIA was merely an administrative action by the Central government and lacked the statutory backing. On January 27, 1994 the Central government notified the draft EIA as a vide powers conferred to it under section 3 (2) (v) and section 3 (1) of the Environment act and it was made mandatory for all the activities relating to projects whether it is the development of a new project or the expansion of existing project it was made mandatory to take Environment Clearance (EC) from the Central Government.³³

DRAFT EIA 2006-

In 2006 when the Central Government vide powers conferred to it, promulgated the new draft EIA notification.³⁴ For the assessment, projects have been divided into two categories, i.e. category A and category B, based on the spatial extent of potential impacts and potential impacts on human health and natural and man-made resources.³⁵ While projects in category A undergo appraisal at national level, whereas those in category B undergo appraisal at state level. Thus the 2006 notification makes the process of clearance decentralized unlike the previous 1994 notification.

STAGES IN THE PRIOR ENVIRONMENT CLEARANCE FOR NEW PROJECTS-

1- Screening-

Screening is done only for projects which have been classified as Category 'B' projects on the basis of spatial extent of their potential impact on environment. Projects falling in Category 'B' generally have a narrow area of their impact on environment. Screening is mainly done to see whether further assessment is required or not. The projects requiring a further assessment are further categorized as B1 and rest as B2.

2- Scoping-

³² CENTRE FOR SCIENCE AND ENVIRONMENT, <https://www.cseindia.org/understanding-eia-383>, (last visited May 23, 2021).

³³ MINISTRY OF ENVIRONMENT AND FOREST, Notification on Environment Impact Assessment, S.O. 60(E), (Jan 27, 1994).

³⁴ MINISTRY OF ENVIRONMENT AND FOREST, Notification on Environment Impact Assessment, S.O. 1533(E), (Spt. 14, 2006).

³⁵ *Id.*



Scoping includes the determination of detailed and comprehensive 'Terms of Reference' on the basis of application form furnished by the project proponent. They are determined by the Expert Appraisal committee or the State Level Expert Appraisal committee depending upon the nature of the project. These terms form the basis of assessment and are communicated to the applicant.

The application for EC may be rejected at this stage itself by giving reasons and conveying the same to the applicant.

3- Public Consultation-

Public consultation is the process by which the concerns of people living in close proximity of the project site and other stakeholders having plausible interest in the project are taken note of. The concerns of the former are invited via public hearing at local sites and that of latter with the help of written responses.

The applicant then has to address the concerns so obtained and submit a revised and final EIA report for appraisal.

4- Appraisal-

Finally, the appraisal is done by the appropriate expert committees taking into account the various documents and public concerns etc. Subsequently, categorical recommendations are given to the concerned regulatory authority regarding whether to provide approval for the project with such terms and conditions as fit or to reject the application for clearance.

A CRITICAL ANALYSIS OF DRAFT EIA 2020

In March 2020, the Ministry introduced a new draft EIA notification to replace the 2006 notification with a view to consolidate all the amendments which were made in it and to expedite the process of clearance while ensuring a proper scrutiny.³⁶ The draft was open for public comments till August 2020 and is awaiting enforcement. The notification has introduced some key changes in the process and has raised apprehensions among the people especially environmental activists.

³⁶ G. Ananthkrishnan, *What are the key changes in the Environment Impact Assessment Notification 2020?*, THE HINDU, (Aug 2, 2020, 12:02 AM), <https://www.thehindu.com/sci-tech/energy-and-environment/the-hindu-explains-what-are-the-key-changes-in-the-environment-impact-assessment-notification->

2020/article32249807.ece.



KEY CHANGES INTRODUCED-

1- Public Consultation-

- The notice period for public hearing has been reduced from 30 days to 20 days.
- Following projects have been granted exemption from the process of public consultation:
 - A) Modernization of irrigation projects;
 - B) Specified projects located within the notified industrial area;
 - C) Buildings, construction and area development projects and elevated roads and standalone flyovers etc.;
 - D) Projects falling under category 'B2';
 - E) All projects concerning national defense and security or involving other strategic considerations as determined by the Central Government;
 - F) Linear projects such as pipelines etc. in Border areas;
 - G) Off shore projects located beyond the 12 nautical miles.³⁷

2- Post- clearance compliance-

Post-clearance compliance means that once a project gets approved by the concerned authority, the proponents of the projects are required to comply with certain rules laid down in the EIA report.³⁸ This is done in order to ensure that the project is not further damaging the environment after getting the clearance.³⁹ For this, the proponents had to submit a bi- annual report in accordance with the mandate of 2006 notification.

However, the new 2020 draft EIA has reduced it to filing the post clearance compliance report annually.

Moreover, submission of the compliance report will be solely prepared by the project proponents itself, without any oversight and review by an authority.

3- Post- facto clearance-

The draft EIA 2020 proposes the mechanism for post- facto clearance which means that a project or activity which is being carried on without acquiring Environment Clearance has been applied to apply for clearance after beginning the operation.

ISSUES AND CONCERNS-

³⁷ MINISTRY OF ENVIRONMENT, FOREST AND CLIMATE CHANGE, Notification, (Mar 2020).

³⁸ Opangmeren Jamir, *India's Environment Impact Assessment Draft 2020: Issues and Challenges*, M. PARRIKAR INSTITUTE FOR DEFENSE STUDIES AND ANALYSES, https://idsa.in/issuebrief/indias-environment-impact-assessment-ojamir-080221#footnote1_nnb7myi, (May 24, 2021).

³⁹ *Id.*



The new draft EIA has raised several issues regarding the protection for environment. The key amendments introduced significantly dilute the procedure of scrutiny and gives an upper hand to projects instead of environment. This dilution is probably the result of government's target to place India among the top 50 countries for 'Ease of Doing Business'. The government in the past few years has introduced various other changes as well for easing the compliance norms for businesses in India.

One significant concern is the dilution of time limit for public consultation. The earlier EIA draft of 2006 was already often criticized for giving only 30 days' notice for inviting public concerns, the new draft has further added to the woes, if anything. The government has cited the reason of growing use of social media and electronic modes of communication to decrease the time limit. However, the digital divide that exists in India has been ignored completely. Most of the project sites in India include remote and secluded areas and sometimes tribal areas, where network and connectivity is a big issue thus making it more difficult to obtain the concerns of affected indigenous people. Thus, the amendment makes the EIA vulnerable to underestimation of environmental costs of a project further affecting the SCBA. Also, the draft leaves some of the projects completely out of the purview of public consultation creating the apprehensions of degradation of environment at a higher pace.

The draft gives Central government power to exempt projects having national and strategical importance from public consultation. The conferring of power solely in the hands of the executive gives rise to the threat of its abuse and compromising with the objective of EIA. Also, a number of other projects have been exempted from this process. This exemption is contrary to 1992 Rio declaration which recognizes public participation as an important step in EIA.

Similarly, the annual filing of post-clearance compliance report will give more time to the project proponents to hide the adverse effect of the projects on the environment.

Further, the provision of post-facto clearance significantly weakens the deterrent effect of the EIA as it would encourage the projects to be initiated without taking the environment clearance. Although there is a provision of penalty but the damage that would be caused to environment due to such unapproved projects is irreplaceable and cannot be reduced to monetary compensation.

CONCLUSION

While economic growth forms the topmost priority of most of the developing nations, the concerns regarding the constant degradation of environment due to ever growing populations and rapid urbanizations has begun taking the center stage. The environment clearance mechanism is often seen as a challenge or constraint to the project development especially by the class of private business entities.⁴⁰ There has been a demand in recent years to simply and ease the compliance mechanism of environment laws and approval of projects. The draft EIA 2020 comes a response to the same. However, the significant dilution in the provisions would greatly affect the social cost- benefit analysis of the project as a number of projects have been exempted from the assessment. This is particularly a matter to worry about as India has ranked 168 out of 180 in the Environment Performance Indicator.⁴¹ This is a clear sign that India must strengthen its environment regulations and laws both at the substantial as well as the procedural level and further make more efforts towards sustainable growth.

ENERGY PROJECTS- CONCERNS

A big area of concern apart from dilution of provisions in the EIA 2020 is that it does not cover the energy projects harnessing energy from renewable sources. The rapid growth of renewable energy projects in India is evident from the fact that in 2019-20, renewable energy capacity addition in India was at 9386 MW. Also, Central Electricity Authority (CEA)'s 'National Electricity Plan 2018' projects a capacity addition in 2017-22 of 54,300 MW of coal and 6823 MW hydro, as against 117,000 MW of renewables; and for 2022-27, an addition of 46,420 MW coal, 12,000 MW hydro and 100,000 MW of renewable electricity capacity.⁴² This implies that these energy projects of renewable energy are no more 'non – conventional' but are as much mainstream as any other resource project.

However, the EIA has failed to keep up with this development as it leaves these projects out of its purview probably going by the earlier belief that these projects do not have any significant impact on the environment. Recent studies suggest that no energy project comes with a 'zero-impact' on the environment, and the impact of these individual energy project when compile

⁴⁰ Akshay Deshmane, *EIA 2020: Builder Lobby Divided Over Modi Govt's Proposed Green Law*, HUFFPOST, (Oct. 8, 2020), https://www.huffpost.com/archive/in/entry/eia-2020-news-narendra-modi-government-environment-real-estate-lobby-credai-bai_in_5f31a0f1c5b64cc99fdca7dc.

⁴¹ ENVIRONMENTAL PERFORMANCE INDICATOR, <https://epi.yale.edu/epi-country-report/IND>, (last

visited May 23, 2021, 7:30 AM).



has a significant impact on the environment.⁴³ Further, displacement of people has always been an issue with the energy projects and it becomes worse in case of renewable energy projects as being unaddressed in the EIA they never undergo the public consultation process.⁴⁴

SUGGESTIONS-

- 1- There is a need for a comprehensive nation- wide regulatory policy which while being stringent in substance must be easy to comply with and does not put unnecessary administrative burden upon the projects.
- 2- Instead of full exemption of projects from the EIA, there may be a specialized policy framework for EIA of such projects which while facilitating their timely implementation ensure their proper scrutiny.
- 3- The power to grant any kind of exemption to projects shall vest with an autonomous body comprising of representatives from various stakeholders and experts instead of the executive.
- 4- Assessment framework for energy projects running on renewable sources shall be developed with the help of dialogue and consultation among various stakeholders.
- 5- The mechanism of public consultation must be made more robust and the documents required or inviting concerns must be made available in regional languages as far as possible.
- 6- Strict penalty should be imposed for post- clearance non –compliance and responsibility for overseeing the project once clearance has been obtained shall not rest solely with the proponent but have intervention of regulatory authorities as well.

It is important that environment regulations are not viewed as a constraint to ease of doing business but should be supplementary to the projects. While a shift to renewable sources of energy is the need of the hour but it should not be without caution and necessary scrutiny mechanism so that they remain eco- friendly as far as possible. A national coordinating body bringing together various stakeholders in energy projects may be established. This would help enhance information exchange among government, academia, non-governmental organizations and the private sector. This will be key to develop a comprehensive policy at the national level.

⁴³ Report *Powering Ahead – An assessment of the socio-economic and environmental impacts of large-scale renewable energy projects and an examination of the existing regulatory context*; Abhishek Pratap, Priya Pillai, Arundhati Muthu; Released July 2020, Heinrich Böll Stiftung and ASAR.

⁴⁴ Shripad Dharmadhikary, *Solar and wind energy projects in India need an impact assessment framework*, THE GAON CONNECTION, (Aug 19, 2020), <https://en.gaonconnection.com/solar-and-wind-energy-projects-in-india-need-an-impact-assessment-framework/>.