

RE: Climate Challenge India – Initial assessment of India’s National Action Plan on Climate Change (NAPCC)

3rd July 2008

Dear Colleagues:

Please find below an interim assessment by the ‘**Climate Challenge India**’ coalition of the Government of India’s National Action Plan on Climate Change released on 30th June 2008.

We welcome the report - which has been long in the making - and believe that a frank and full assessment of it is now needed with a view to setting a clear and ambitious direction on this vital agenda for our country. So far, the process of the report has not benefitted from public consultation with a range of key stakeholders and interested communities including civil society, business and local government.

If key aspects of the report are to be implemented – and improved upon – they will require the engagement of India’s many diverse and enterprising communities. We call on our Government to establish mechanisms to promote such engagement, and commit ourselves to a democratization of debate on climate policy and its effective implementation in India.

Regards,

Malini Mehra

Chief Executive, Centre for Social Markets (Co-convener, Climate Challenge India)

Bittu Sahgal

Editor, Sanctuary Magazine (Co-convener, Climate Challenge India)

Pavan Sukhdev

Chair, Green India States Trust

Ranjit Barthakar

Balipara Tract and Frontier Foundation

Manu Sharma

Convener, Green India

Govind Singh

Founder-Member, India Youth Climate Network & Delhi Greens

NB.: The ‘Climate Challenge India’ coalition is a grouping of environmental experts, financiers, businesspeople, analysts and activists committed to developing a positive leadership agenda on climate change for India.

INDIA'S NATIONAL ACTION PLAN ON CLIMATE CHANGE

An interim assessment by the 'Climate Challenge India' coalition

SUMMARY

On 30 June 2008, the Prime Minister released his Government's long-awaited National Action Plan on Climate Change in advance of the G-8 meeting in Hokkaido, Japan. At 52-pages, this was the culmination of a year's work under the guidance of a specially-constituted Advisory Council on Climate Change and the input of a range of ministries and experts.

While welcoming the fact that a national action plan had been tabled for discussion, the group concluded that an opportunity to demonstrate leadership on a critical issue for the country had been missed. The National Action Plan on Climate Change (NAPCC) effectively pulled together a number of the government's existing national plans on water, renewable energy, energy efficiency, agriculture and others – bundled with additional ones - into a set of eight national 'missions'.

The eight missions focus on: increasing the share of solar energy in the total energy mix; implementation of energy efficiency measures; launching sustainable habitats; effective water resource management; safeguarding Himalayan glacier and mountain eco-systems, enhancing eco-system services; making agriculture more resilient to climate change; and setting up a Strategic Knowledge Mission for focused research in this area.

While this was undeniably welcome in the main, and promoted a more coherent approach to sustainable development across government departments, it did not demonstrate the adoption of a new, more forward-looking agenda based on ensuring climate security for the nation, or a well-thought through 'strategy' chalking out a discernible low-carbon pathway for India.

Disappointingly, the Action Plan's over-reliance on dated IPCC projections, meant that it was not based on the best available current climate science, and hence not responding according to the degree of urgency leading scientists now believe is required.

Indeed, many vestiges of the Government's old approach to climate policy and mindset remained. For example, in the very first paragraph of the report, the Government took a dig at 'developed countries' for having caused climate change in the first place. Nowhere noting in the report that India is already the fourth-largest emitter of greenhouse gases, and on its way to becoming a major emitter in its own turn in coming years. Taking ownership of the problem should have been a first step

Another serious shortcoming was the absence of any sense of palpable urgency about climate change, or the establishment of clear targets and timetables for action that would have reflected a more serious level of commitment by the government.

More welcome was the recognition that climate change is a serious inter-generational challenge and that particular attention needed to be paid in adaptation strategies to gender and vulnerable groups such as women, children and the elderly. The importance of coastal defence and the strengthening of disaster management capacity were also welcome. But the absence of any attention to the need for climate-resilient planning for India's metropolises or Tier II cities, showed an utter lack of understanding about the challenge to human habitats posed by climate change.

On balance, the verdict of the 'Climate Challenge India' coalition on the National Action Plan on Climate Change was a critical one. The group gave the report a B+ for effort, and a D for vision.

If the government was serious about addressing climate change it would need to do better in both framing the issue as well as devising a plan for implementation. As this was the first public iteration of the government's intention, the CCI coalition committed itself to working with the government, and all key stakeholders, to democratize agenda-setting and decision-making on climate change in India.

In commenting on their assessment, **Malini Mehra**, chief executive of the Centre for Social Markets, and co-convenor of the coalition, said: *"As Indians we need to take ownership of this issue. It is too important to be left up to Government. This report has been written by bureaucrats, not visionaries. If we are to rise to the challenge of climate change and make our collective future a secure one, we will have to show vision and leadership. We have more than a billion good reasons for doing so and the time to act is now."*

Bittu Sahgal, editor, Sanctuary Magazine and co-convenor, said: *"There is only one thing to say for this tepid document. Too little, too late, too casual, too glib. It will do virtually nothing to fight climate change. It merely bolsters the tired international climate change negotiations engaged in by India. It may help us earn some cash, but it is not going to protect our people, nor does it offer any climate leadership for a global community."*

Pavan Sukhdev, chair of GIST, and Director of their Green Accounting for Indian States Project, said: *"The Action Plan fails to recognize that conservation of existing forest cover is crucial for the success of both the government's Water Mission and the Mission for a Green India. Afforestation through man-made plantations alone will not suffice. It is therefore in India's self-interest to strongly conserve existing forests. Forest conservation should not be seen as just a mitigation strategy, it is the very lifeblood of poor communities."*

Govind Singh, representative of young India and founder-member of the India Youth Climate Network, said: *"Although the Plan speaks a lot about what needs to be done, it throws little light on the 'plan' of action to be followed. It's important that the Prime Minister not only realizes but has*

also clarified that the Plan would evolve and change, and has invited civil society to further improve its various elements."

Ranjit Barthakar, entrepreneur and green economist, noted: *"The National Action Plan is an excellent step in the right direction. However, it does not strategize as to how India could position itself as a leader in the World of Ecological Value Delivery and this may be a big opportunity loss."*

Manu Sharma, businessman and green activist, said: *"Without a target of emission reductions and a time frame to achieve them the policy has no real substance. It's just an exercise into deluding ourselves that we're acting on this issue while India's emissions all set to quadruple by 2030. These half measures will be nowhere close to achieving the kind of reductions that are required. We need radical and transformative actions on all the fronts listed in the plan as well as in abandoning fossil fuels."*

DETAIL OF INTERIM ASSESSMENT BY CLIMATE CHALLENGE INDIA

Already twice anticipated and much-delayed – once at the critical juncture of the United Nations Bali conference on climate change in December 2007 – what did the National Action Plan on Climate Change (NAPCC) tell us of the Government of India's understanding of the climate challenge for India and its strategy to address it?

Firstly, it told us that while the Government regularly quotes the International Panel on Climate Change (IPCC) in the report, it has not yet internalised the urgency or gravity of the challenge. The Action Plan is full of caveats and the word 'may' is invoked repeatedly to describe impacts when more sure-footed, and scientifically-justifiable, language could have been used.

This is contrary to what much of the best-available climate science is telling us.

For example, in his 23rd June 2008 testimony before the US Congress, - marking the 20th anniversary of his first ground-breaking testimony on global warming before the US Senate - NASA scientist, James Hansen, summarised the challenge as follows:

"...a wide gap has developed between what is understood about global warming by the relevant scientific communities and what is known by policymakers and the public. ...we have used up all slack in the schedule for actions needed to defuse the global warming time bomb. ...more warming is already "in-the-pipeline ...and climate is nearing dangerous tipping points. Elements of a "perfect storm", a global cataclysm, are assembled."

India with its long coast line and large population is one of the most at-risk countries to climate change. Yet the Government's report reads as if there is no serious problem with global atmospheric destabilisation, and that climate change is just a case of local difficulties here and there, which – as long as they are adapted to – can be managed.

This is epitomised by its approach in the NAPCC which talks about promoting development objectives while at the same time addressing climate change co-benefits

– assuming blithely that this can be done; rather than fundamentally rethinking India's development and growth strategy in the context of a climate-changed world where energy, water and food insecurities will be the norm rather than the exception.

The reality is that the scale of emission reductions needed to keep atmospheric CO₂ under the safe level of under 350 ppm – as advocated by Hansen *et al* – will require an extraordinary effort by all nations in less time than we originally thought we had. The chair of the IPCC, Dr Rajendra Pachauri, puts it at 7 years and counting.

We have already reached the 387 ppm mark this year and are on our way to reaching 1000 ppm under a business-as-usual scenario. The NAPCC uses IPCC scenarios but there is no evidence of a systematic scientific evidence-base - using the latest international scientific reports - to inform government policy on climate change. This is a major shortcoming.

This is not to suggest that the report is entirely without merit. There are a number of welcome measures in the report. The focus on the further enhancement of eight 'mission' areas – many of them already the subject of national plans – is welcome.

The eight missions focus on: increasing the share of solar energy in the total energy mix; implementation of energy efficiency measures; launching sustainable habitats; effective water resource management; safeguarding Himalayan glacier and mountain eco-systems, enhancing eco-system services; making agriculture more resilient to climate change; and setting up a Strategic Knowledge Mission for focused research in this area. Each of these areas is important.

But there are also significant lacunae which reflect a lack of strategic thinking and engagement in the development of this report:

1. Absence of targets or timetables

In the absence of concrete targets, timetables, and implementation strategies, for each of its eight mission areas, the Action Plan is a long list of nice-sounding commitments and vague initiatives. It is critical that targets and timetables are established to provide clear direction for the country and, importantly, act as a spur to industry which has a strong leadership role to play.

For example, India can set a clear target for its Solar Mission raising the present 6% contribution of wind and solar to India's energy mix, to something more capable of neutralising the dominance of coal. India can also demonstrate leadership by setting up strict but achievable voluntary emission reduction targets.

The Government has likened this Action Plan to China's but omitted to mention that China has actually adopted a range of targets for renewable energy and energy efficiency, to fuel efficiency standards and national innovation. China has also begun to make major investments in clean coal technology, carbon capture & storage demonstration plants, low-carbon innovation zones and other pioneering efforts. If India wishes to be taken seriously it needs to catch up with - and then go beyond - China to demonstrate true global climate leadership.

2. Failure on forests

This is one of most egregious aspects of the NAPCC. Nothing exemplifies the fundamental problem with India's Action Plan than its forest agenda and its denial of the fact that climate change is causing glacier melt.

The NAPCC fails to recognize that conservation of existing forest cover is crucial for the success of both the Action Plan's Water Mission and the Mission for a Green India. Man-made plantations alone will not suffice - especially given India's mixed track record which includes rampant use of exotics, poor post-planting maintenance, and weak protection.

The Action Plan's lack of focus on forest conservation (as opposed to afforestation) will lose us significant income opportunities for our poor forest-dwelling communities, and for our states rich in forest cover, under the REDD scheme proposals launched at Bali.

The Action Plan fails to recognize the fact that forest ecosystem and biodiversity services contribute more than 50% of the total livelihood incomes of over 500 million of India's poor. In other words, there are significant risks of deeper and more extensive poverty by any loss or decline in the services of India's forests. The services are substantial and include: water and nutrient flows from forest to field, water regulation through the seasons, flood loss mitigation, drought prevention, NTFP gathering, etc.

It is therefore in India's self-interest to strongly conserve existing forests. Forest conservation should not be seen as just a mitigation strategy, it is the very lifeblood of poor communities. The government must urgently inform and educate the poor of the climate-related risks to forests, and actively engage them in paid conservation practices. It must also identify other extant threats to forests, and address them urgently through better laws and better enforcement.

3. Denial on Himalayan glacier melt

One of the most contentious paragraphs in the NAPCC has to do with an accepted impact that has assumed iconic importance in India: that of glacier melt.

The Action Plan asserts: *"The available monitoring data on Himalayan glaciers indicates that while recession of some glaciers has occurred in some Himalayan regions in recent years, the trend is not consistent across the entire mountain chain. It is accordingly, too early to establish long-term trends, or their causation, in respect of which there are several hypotheses."*

In plain English, the Government appears to be suggesting that the rapid melting of the Himalayan glaciers may not have anything to do with climate change. Little wonder then that India's energy policy will continue to rely on tripling coal fired thermal plants capacity and building high dams in the Himalaya at a cost of over 3,00,000 crores, even though glacier melt-water may not be available to turn most of the turbines by the time the last dam is built.

4. Renewable energy and fossil fuels

The Action Plan's emphasis on promoting renewable energy adoption is very welcome. However, the sector needs a dramatically larger push if it is to become the leading provider of energy in the coming decades.

The government's lack of a road-map to phase out fossil fuels, and their subsidies, as a necessary step towards moving towards a low-carbon economy is disappointing. As is the Action Plan's silence on coal, which is set to expand as part of India's fuel mix over the coming decades. India urgently needs a clear and positive strategy on coal if we are not to become the climate pariahs of the future.

5. Energy efficiency

The Action Plan's emphasis on energy efficiency measures is to be welcomed, but these need to be greatly strengthened. It is widely accepted that the Energy Conservation Act has been a failure in practice and that the Bureau of Energy Efficiency is a chronically understaffed body with limited resources to implement its policies in state. The Energy Conservation Building Code stipulates only the *minimum* voluntary standards a large building must adhere to. It needs to make standards mandatory through statutes, set up higher standards and develop standards for old and smaller buildings as well.

Information on CCI Coalition members can be found at:

Centre for Social Markets: www.csmworld.org

Sanctuary Magazine: www.sanctuaryasia.com

Green India States Trust: www.gistindia.org

Balipara Tract & Frontier Foundation: www.baliparafoundation.com

Green India: <http://groups.google.com/group/green-india>

India Youth Climate Network: www.iycn.in

For more information, please contact:

Ms Viva Kermani

CCI – Secretariat

Centre for Social Markets

Email: info@csmworld.org; viva@csmworld.org

Website: www.csmworld.org