

Tuesday, August 11th, 2020



To: Secretary Ministry of Environment, Forests and Climate Change
Indira Paryavaran Bhawan,
Jor Bagh, New Delhi
New Delhi, India

Subject: Suggestions of the INDIAN SOCIETY OF LANDSCAPE ARCHITECTS (ISOLA)
for the DRAFT OF THE ENVIRONMENTAL IMPACT ASSESSMENT 2020

The Indian Society of Landscape Architects or ISOLA (www.isola.org.in) has members who are qualified Landscape Architects*. As professionals, they are trained to take decisions not at the cost of, but by enhancing natural systems and safeguarding the built environment.

This note is the response of ISOLA to the excerpt from the Government of India circular which includes the following:

‘AND WHEREAS, the Central Government hereby publishes this draft notification in exercise of the powers conferred by sub-section (1) and clause (v) of sub-section (2) of section 3 and section 23 of the Environment (Protection) Act, 1986, read with clause (d) of sub-rule (3) or rule 5 of the Environment (Protection) Rules, 1986 and in supersession of the notification number S.O. 1533 (E) dated the 14th September, 2006 read with subsequent amendments, notification numbers S.O. 190 (E) dated the 20th January, 2016, S.O. 4307(E) dated the 29th November, 2019, S.O. 750(E) dated the 17th February, 2020, except in respect of things done or omitted to be done before such supersession. 1. Short title and commencement: - i. This notification may be called the Environment Impact Assessment Notification, 2020 (hereinafter referred to as ‘EIA Notification, 2020’). ii. This notification shall come into force on the date of publication of final notification in the Official Gazette. 2. Application of the notification: - This notification is applicable to whole of India including territorial waters’

The notification also adds:

‘Any person interested in making any objections or suggestions on the proposal contained in the draft notification may forward the same in writing for consideration of the Central Government within the period so specified to the Secretary, Ministry of Environment, Forest and Climate Change, Indira Paryavaran Bhawan, Jor Bagh Road, Aliganj, New Delhi 110 003, or send it to the e-mail address at eia2020-moefcc@gov.in.’

Further, the notification states the following:

“‘Environment Impact Assessment (hereinafter referred to as ‘EIA’) Report” is the document prepared by the Project Proponent through an ACO for the proposed project based on the Terms of Reference prescribed by the Regulatory Authority and as per the generic structure given in the Appendix-X of this notification; a. “Draft EIA Report” is the EIA Report prepared for the purpose of Public Consultation or in accordance with the directions of the Regulatory Authority; b. “Final EIA Report” is the EIA Report prepared, after public consultation, including mitigation measures duly addressing the concerns raised by the public, time bound action plan, budgetary provision for the commitments made therein by the project proponent, for the purpose of appraisal;

INDIAN SOCIETY OF LANDSCAPE ARCHITECTS

Registered under Indian Societies Act 1860 Sec. 21 No.: **Guj2557** & Bombay Trust Act 1950 Section 29 No.: **F9417**

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As Landscape architects, we strongly believe that the rigour of the Environmental Impact Assessment will determine the effectiveness of India's resolve to fulfil the requirements of the Paris Agreement on climate change, India being an important signatory.

ISOLA would like to convey three major concerns which need rectification:

1. Landscape architects are not a part of the Expert Appraisal Committee list of those eligible to be part of the same. The Appraisal Committee will surely benefit by the inclusion of Landscape architects which evaluate and enhance the quality of 'proponent' evaluations.
2. The criteria for the EIA report must be expanded to account for assessing and providing for familiar livelihoods and not only rehabilitation of those displaced. The setting for evaluation of livelihoods is primarily the affected landscape. ISOLA can be a very valuable agency in assessment and translocation of livelihoods. ISOLA has to be included in the list of agencies which are eligible to conduct and record public hearings by recommending ISOLA to the National Accreditation Board for Certification Bodies under the Quality Council of India.
3. ISOLA also needs to be recommended to the Technical Appraisal Committee which are project specific. ISOLA has nine Chapters distributed all over India and can therefore contribute with local professional expertise as well.

ISOLA is eager to be part of effective, sustainable nation building. As professionals, Landscape Architects have the right credentials for evaluation, assessment and analyses of data that affects livelihoods and the landscape and provide design solutions for the proponent for effective environmental management.

Sujata Kohli
Honorary President

Sridevi Rao
Honorary Vice President

Nidhi Madan
Honorary Secretary

Jitendra Pawgi
Honorary Treasurer

INDIAN SOCIETY OF LANDSCAPE ARCHITECTS

The Indian Society of Landscape Architects (ISOLA), the professional body of landscape architects, includes over 600 members across India and around the world. The mission of ISOLA, established in 2003, is to nurture and enhance the profession of landscape architecture by providing leadership in the creation of artistic and ecologically sound designs, and in the shaping and management of our human-made, cultural and natural environments. The organisation has also been accorded the status as a member of the International Federation of Landscape Architects (IFLA) - a body representing the concerns of the profession worldwide. Details of the organisation can be accessed at www.isola.org.in.

** Landscape Architecture aims to achieve the well-being of humans as well as other species along with their associated communities, structures, and functions. It involves settings ranging from the urbanised to the natural across all scales within the human range, from the microscale to the macroscale. The discipline and the profession involve, but are not limited to, the fields of ecosystem analyses, vegetation studies, hydrology, sociology, environmental psychology, cultural studies, spatial design, and construction technology.*

Landscape Architects are professionals with a recognized qualification in Landscape Architecture. They are trained to analyse the intersections of nature and culture in space and time. They provide services for site selection, programming, conceptualizing, site and master planning, design development, designing and detailing. Therefore landscape architects evaluate environments of various types so as to holistically define and address various protection, conservation, restoration, regeneration, and development issues and opportunities.

Decisions in Landscape Architecture are taken to integrate and enhance natural and human interactions within the designed and built environments, to positively affect the quality of land, water and air.

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