

Title: Neglect of health and health systems in the Environmental Impact Assessment policy and process in India

Background: Environmental Impact Assessments (EIA) of proposed developmental and industrial projects are mandatory in India. The EIA Notification of 2006 provides rules for the governance and implementation of EIAs. Health Impact Assessment (HIA) is considered implicit under the EIA notification. Several projects are being cleared allegedly without adequate considerations towards health, health systems and the environment. Industrial projects are usually located in areas inhabited by marginalised and vulnerable communities. There is a need to evaluate the EIA Notification and processes to understand their adequacy towards accounting health impact.

Method: The framework developed by Parry and Kemm (2006) was supplemented with innovations from Winkler (2010, 2011) and Birley (2011) for the evaluation. Three documents were evaluated: a) The EIA Notification 2006 (India); b) an EIA report of a proposed coal mine, and c) an EIA report of a proposed thermal power project. The gaps were identified and findings compared with other evidence.

Results: The EIA Notification neither included a definition of health nor provided a separate section on health or health systems impact assessment. Its application is restricted to a list of industries included in the notification. Large gaps exist in the guidelines to identify health impacts of proposed projects. The two case reports also demonstrated a lack of focus on health. The special provisions for communicating plans and impacts with tribal and linguistic communities were inadequate. The impacts on displaced communities and the health system requirements of in-migrating communities have largely been underreported.

Conclusions: The gaps identified show a neglect of health and health systems impacts of proposed projects. The policy focus of the government is towards increase the country's production and revenue, and costs are being externalised on marginalised communities and the environment in the process. HIAs could serve as an important step towards health equity and sustainable development.