

Revised Guidelines for Idol Immersion :

(published by the Central Pollution Control Board (CPCB) of the Ministry of Environment, Forests and Climate Change on 12 May 2020.)

A review (Compiled by eCoexist)

ABOUT THE GUIDELINES	2
SCOPE	2
TIMING OF THE BAN	3
PROHIBITIONS	3
EXEMPTIONS	3
SUGGESTED REFINEMENTS OF GUIDELINES:	4
Ecology:	4
MATERIALS: Idols	4
SIZE OF IDOLS	6
MATERIALS: Paints	6
MATERIALS: Decorations	6
IMMERSIONS	7
GOVERNANCE	8
DISPOSAL	9
Monitoring and Implementation by Pollution Control Boards	9
Livelihoods:	9
Economics of Business – Circular Economy:	10
Faith and Traditions	11
COMMUNITY AWARENESS	11
Promotion and Communication of the Ban	11
ALTERNATIVES: THE WAY FORWARD	11
SIGNED BY	12

ABOUT THE GUIDELINES

This critique concerns the Revised Guidelines for Idol Immersion, published by the Central Pollution Control Board (CPCB) of the Ministry of Environment, Forests and Climate Change on May 12, 2020.¹

The guidelines are the result of a long debate. It dates back to the 2008 Bombay High Court decision in the matter of Janhit Manch vs. the State of Maharashtra, in which the regulation of idol immersions during the Ganesh Chaturthi festival was decreed. The CPCB published “Guidelines for Idol Immersion” in June 2010.² However, they proved to be ineffective in preventing idols made of toxic, inorganic materials to be disposed of in water bodies. As an effect, Ganesh Chaturthi has continued to inflict substantial damages on the environment every year.³ It is, therefore, a good sign that the CPCB has recognised the urgency of revising the previous guidelines.

The ban on Plaster of Paris and chemical paints for religious idols that require immersion has been long awaited and it is a welcome move. We fully endorse this step and have laid out aspects below that we feel will enable the successful implementation of this ban.

The ban is mostly focussed on Hindu festivals - more description and measures for immersion during the Muslim festival of Muhurram need to be mentioned, with guidelines specific to their rituals.

SCOPE

The guidelines address the following stakeholders that are involved in the immersion of religious idols during festivals:

1. Idol Makers-Craftsman or Artisans
2. Pooja Organizing Committees
3. Local and Urban Authorities
4. Citizens
5. State Pollution Control Boards (SPCBs) in States and Pollution Control Committees (PCCs) in Union Territories.

They include, among others, following points:

1. Materials used
2. Governance of production of idols
3. Immersion procedures and governance
4. Disposal of solid waste and of immersion water

¹ Central Pollution Control Board. Ministry of Environment, Forests and Climate Change. “Revised Guidelines for Idol Immersion.” May 12, 2020, <https://cpcb.nic.in/openpdffile.php?id=TGF0ZXN0RmlsZS8yOTVfMTU4OTI3Mzk4NI9tZWZpYXBob3RvMjQzNjUucGRm>

² Central Pollution Control Board. Ministry of Environment and Forests. “Guidelines for Idol Immersion.” June, 2010, <http://kspcb.gov.in/CPCB%20Guidelines.pdf>

³ Bhattacharya, Bera, Dutta and Chand Ghosh. “Effects of Idol immersion on the water quality parameters of Indian water bodies: Environmental health perspectives.” In: International Letters of Chemistry, Physics and Astronomy, 2014, <https://www.scipress.com/ILCPA.39.234.pdf>

TIMING OF THE BAN

The publication of the revised guidelines has come at a time at which idol production for the 2020 festival has already been going on for several months. As in previous years, the timing has raised resistance from the idol makers. They argue that they would incur heavy financial losses, thus asking for a deferral which has yet again been granted.⁴ The signees, therefore, stress the importance of announcing the ban **right after the Ganesh festival** in order to give artisans enough time to switch from Plaster of Paris to eco-friendlier alternatives.

Furthermore, seventeen years have passed since the Public Interest Litigation filed by the Janhit Manch to result in a ban on use of toxic, non-biodegradable materials and their immersion. During this time, the quantum of pollution caused by the festival has irrevocably polluted precious water resources. It is imperative that the guidelines issued by the CPCB be brought into effect immediately and no concessions be made anymore.

Indians have become aware of the human impact on our ecosystems during the COVID-19 crisis. This has especially been visible through drastic improvement of water bodies' quality all over India, such as the Mula-Mutha river.⁵ Therefore, this is the right juncture to encourage a more conscious behaviour also after the end of the lockdown.

PROHIBITIONS

What is not allowed?

1. The use of Plaster of Paris for making idols
2. Use of toxic and non-biodegradable chemical dyes/oil paints for painting idols
3. Use of Single use plastic and thermocol materials for decoration and for distribution of prasad
4. Regulation on size of idols
5. Littering or burning of solid wastes

EXEMPTIONS

What is allowed?

⁴ "1 year stay on ban on Ganesh idols made of Plaster of Paris (POP)." In: Mumbai Mirror, May 22, 2020, <https://mumbaimirror.indiatimes.com/coronavirus/news/1-year-stay-on-ban-on-ganesh-idols-made-of-plaster-of-paris-pop/articleshow/75896027.cms>

⁵ Abhay Khairnar, "Pune pollution at a record low, readings better than CPCB recommendation." In: Hindustan Times, May 18, 2020, <https://www.hindustantimes.com/cities/pune-pollution-at-a-record-low-readings-better-than-cpcb-recommendation/story-jjSg2HSylBrilJ3cmue2rN.html>

1. Materials that are biodegradable
2. Immersion in tanks built for visarjan
3. Regulated immersion in natural water bodies

SUGGESTED REFINEMENTS OF GUIDELINES:

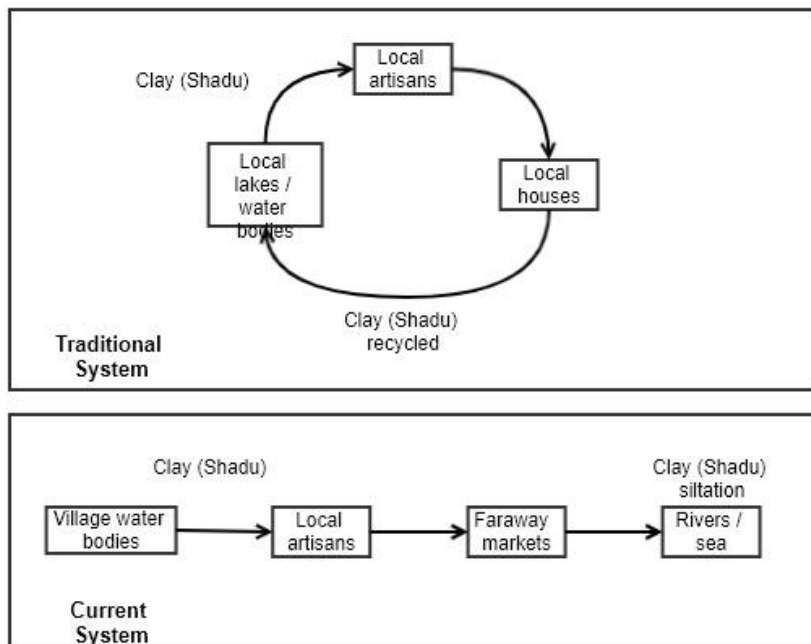
Ecology:

MATERIALS: Idols

The ban of Plaster of Paris idols is a crucial step in rendering the Ganesh Chaturthi festival more eco-friendly, thus being a welcome addition to the previous guidelines. PoP is a non biodegradable man made substance that does not easily degrade and is not assimilated by the environment. Hence the banning of PoP will ensure that the water bodies stay clean.

The main alternative to PoP currently available in the market is Natural clay (shaadu maati).

Natural clay is a **non renewable resource**. Traditionally, the clay needed for making idols was taken from local sources, from the sediment in lakes or on river banks. This was then returned to the same source it was taken from. The ban does not specify the source of raw materials for eg. Natural clay. The instructions regarding the sourcing, procurement and handling are missing.



However as the clay idol industry grew, it was then mined from specific regions to obtain a certain quality of clay. If everyone were to turn from PoP to natural clay, the quantum of clay needed would make its exploitation unsustainable, and create another ecological disaster. The process of mining clay also poses risks for contamination to nearby water bodies.⁶

Additionally, environmental NGOs have raised the concern that big amounts of dissolved clay may create an impermeable layer at the bottom of the river that prevents water percolation into the groundwater aquifers.

Innovations are required in the materials used for making idols. The sentence, “the craftsman or artisans prefer to adopt innovative approaches” (p.3) leaves the choice of readjusting to a more sustainable production method to the idol makers. Innovations to reduce pollution, however, are not a matter of preference and must be made **obligatory**.

Recommendations:

- Studies must be undertaken to understand the impact of mining natural clay on the ecosystems it is taken from and guidelines for sustainable mining need to be outlined.
- We suggest a more extensive promotion of eco-friendlier materials like paper-mâché or cow dung.

⁶ Kofi Asante-Kyei and Alexander Addae, “The Economic and Environmental Impacts on Clay Harvesting at Abonko in the Mfantseman West District of Central Region, Ghana.” In: American Scientific Research Journal for Engineering, Technology, and Sciences, 2016, https://asrjetsjournal.org/index.php/American_Scientific_Journal/article/view/1507/733

- The guideline must mention a focus on RENEWABLE biodegradable materials rather than NON RENEWABLE mineral materials.
- Research and Development into newer biodegradable materials like mushroom or coconut coir based materials must be encouraged by the government.

SIZE OF IDOLS

On page 4, the guidelines state that “As far as possible, low height and eco-friendly idols [...] should be used for offering poojas.” There is no specification of the height restrictions. The term “low” is subjective and leaves too much room for interpretation. The CPCB should, therefore, numerically specify the height and weight range of the idols depending on the type of water body in which they are immersed.

Recommendations:

Specific size limits must be provided by government for individual and community use. Miniature idol immersion should be promoted and permanent idols for worship should be considered.

MATERIALS: Paints

‘Enamel and synthetic dye based paints on idols should be discouraged instead of eco-friendly water-based, bio-degradable and non-toxic natural dyes should be used.’ This will also promote local businesses engaged in natural paints.

This clause ensures that our water and soil stay free of a toxic load due to the immersion of lead based and synthetic paints.

Recommendations:

- Being water soluble does not make a paint non toxic. This difference has to be clarified in awareness campaigns
- Gradually the public should move towards only the use of natural pigments in the painting of idols or no paints at all.
- The claims of certain paint companies in being ecofriendly or non toxic need to be substantiated and approved by the government.

MATERIALS: Decorations

The guidelines state that

‘Use of Single use plastic and thermocol materials shall not be permitted strictly and only eco-friendly materials.’ and

‘Only dried flower components, straw etc. for making ornaments of idols and natural resins of trees may be used as a shining material for making idols attractive.’

Recommendations:

To ensure effective implementation, it is important to start controls at the earliest possible stage. A production ban on any toxic, non-biodegradable decorations and colours that are specifically made for the production of Ganesh idols should be taken into consideration. The same applies for the ban of plastic, thermocol materials and any sort of non-biodegradable chemical dyes. The use of “feathers of different birds” as decorations must not be permitted.

IMMERSIONS

1. The document mentions the possibility of immersion in natural water bodies being “inevitable” in certain situations – this submission creates a loophole in the document and will allow for exceptions to be made. “Inevitable” situations need to be specifically outlined to reduce any space for ambiguity.
2. Currently, by stating that “as far as possible, instead of immersion of idols in water bodies, all the resident welfare associations or individual households [...] should be encouraged to create temporary ponds/tanks [...], and public should be involved for immersion of idols in such temporary/artificial ponds/tanks”, the guidelines still leave the possibility for immersions in natural water bodies. As a result, people may refuse to use artificial tanks. It is, therefore, of utmost importance to **clearly ban any immersion of idols in open natural water bodies**.
3. It should remain first priority to urge the public to do without the traditional immersion into water bodies, conducting a symbolic immersion at home instead. The Visarjan charge described in the guidelines offers a good opportunity for this matter. However, it is not yet described properly. By stating that “the charges of hiring/outsourcing agencies to clean-up the wastes from the designated idol immersion sites should be collected as visarjan charges’ from every individual citizen or community” (p.12), the guidelines imply that the charge will be applied as a general tax. This would prove unfair to people who immerse within their own household. Instead, the charge should be levied directly at the immersion points, thus disincentivising an immersion at water bodies.
4. The ban states that ‘In case of immersion of idols in rivers, lakes or ponds is inevitable, a designated location (having proper approach, access, corner portion of a river/pond/lake, having shallow depth of water in river or lakes or ponds) should be identified’... this defeats the intention of protecting water bodies - immersion in a corner of a lake is equivalent to immersion in the lake itself as it is impossible to prevent waters from mingling.
5. The guidelines leave the possibility of immersion in the sea open and advise on precautions to be taken when immersing in the sea. However, while we do protect the river and lakes and wells, it is equally important to ensure that the seas and oceans also stay free of any man made objects and items. By imposing a complete ban on immersion in the seas, the guidelines will ensure that we reduce marine pollution as well.

Recommendations:

- Specify which situations are considered ‘inevitable’ for immersion in natural water bodies.
- Clearly ban immersion in natural water bodies and encourage the development of alternatives

- Clarify further the application of visarjan charges
- Delete the possibility of immersion in a corner of a natural water body.
- Ban immersion in the sea completely.
- After completion of the immersion, the water from the Immersion tanks/ponds must be settled using coagulants like Alum. Supernatant liquid should be sent to STP and the mud may be disposed off at a suitable landfill site. Nothing from the immersion tanks can go into the rivers.
- Tazia immersion, add “following all the rules and guidelines mentioned for Ganesh Festival.”
- During all days of the festival, the ULB should make a separate arrangement for depositing used flowers for composting. The used flowers may not be added to city solid waste. For immersion in natural lakes/ponds or water bodies, ULB should take help of experts and fix the number of idols that can be immersed in depending on size and water quantity in the water body.

GOVERNANCE

The guidelines outlines several steps to govern the appropriate management of the immersions.

1. Registration of Artisans with ULBs - revoking of license if ban is not followed
 2. Deposit for larger idol makers - forfeit of deposit
 3. Visarjan charges to citizens
 4. Barricading of river and natural water bodies
 5. Submission of a management plan for large events, in advance of the festival
 6. Spot fines to those who violate the guidelines
6. The sentence “Pooja Organising Committees should seek prior permission from concerned ULB [...] well at least one month in advance” (p.4) should specifically name the concerned authority to avoid any unclarities or confusion.
 7. The ban mentions that the artisans and craftsmen need to register themselves. So a list of registered artisans will need to be made public. Also the document does not mention registration for distributors. Besides the producers and the users, the entire supply chain will also have to be regulated.
 8. The visarjan charges for groups and individuals, the utilisation and monitoring of these charges haven't been explained in detail. It is mentioned that the ‘visarjan charges’ will be taken from every individual citizen or community. Rule will prove unfair for people immersing in their household itself. The charge should be levied on people coming to immerse their idols only at the immersion point. This will discourage people from coming to the water bodies.

Reccommendations:

- Clarify the regulations for the entire supply chain from producers, to distributors and end users.
- Specify the exact authority to report to

- Clarify the implementation of visarjan charges

DISPOSAL

9. Stating that “only non-recyclable/non-biodegradable/non-recoverable materials should be disposed of in sanitary landfills by the Local/Urban bodies” (p.9) the guideline leaves loopholes for the use of inorganic materials, thus contradicting the central idea of the ban. A clear list of these materials, and in what situations it would be allowed to use them. However, ULBs should still clearly discourage their use.
10. Ideally, the location of and capacity of the immersion tanks being built should be proportional to the population of devotees who will use them for immersion. The visarjan fees can also be a way to limit the number of people using public immersion tanks and encourage people to do the immersion at home.
11. The festivities give rise to a lot of associated waste due to the decorations, offerings, etc. The management of this waste in a standard manner is absent. The waste ranges from flowers, clothes, paper plastic thermocol decor, that is recyclable as well as biodegradable. A clear list of solutions for each item that is found in Nirmalya needs to be made.

Recommendations:

The clause of unavoidable landfill dumping should be removed. It gives a levy for dumping activity attached to the festivities.

Clarify possible options for reuse and recycling of solid waste

Outline the format of the management plan expected from organising committees

Monitoring and Implementation by Pollution Control Boards

The guidelines specify several steps for the state Pollution Control Boards to monitor and implement the effectiveness of the steps they have outlined:

The guidelines recommend testing of waters in the immersion tanks before they are allowed to flow into the natural water bodies. As the festival progresses over ten days the immersion happens on days 1,3,5 7, and 10 - each time the number of devotees increase in number. The time it takes to empty the tank and prepare it again for the next day will not allow a systematic monitoring of water quality.

Livelihoods:

As a large percentage of the artisanal community depends on the production and sale of these items, these guidelines are surely going to impact the livelihoods of those communities.

To mitigate the setback, it is important that the challenges faced by artisans in shifting from PoP to biodegradable materials is understood by the government. If assistance can be provided to the artisans, the implementation of the ban would be more effective.

1. Sourcing raw material
2. Labour and mechanisation
3. Damage, risk and balance stocks
4. Monsoons
5. Markets
6. Skill development
7. Research and Development

The ban on Plaster of Paris idols, although being environmentally favourable, puts the livelihood of idol makers at risk. As the production of clay idols requires more skilled labour, many idol makers may not be able to continue working in the industry. The government must, therefore, step in and offer retraining programmes in cooperation with clay idol makers. In this way, PoP murtikars can find employment in the future, at the same time matching the increasing demand for clay idols.

The transition from Plaster of Paris to clay will be beneficial in the long term, as it will, being more labour-intensive, provide more job opportunities once a successful reskilling campaign has been conducted.

Economics of Business – Circular Economy:

In order to minimise the newly mined amount of raw materials, sculptors must be incentivised to reuse clay from previous years. For this to happen, logistics and intermediate organisations, public or private, should be introduced in order to convert sludge into usable clay. Its use should be encouraged by setting the price below the one of the market for freshly harvested clay. Furthermore, in case of excess, the recycled clay shall also be made available for other industries.

Concerning the idol production, the goal shall remain to attempt the complete elimination of waste, at the same time recycling organic waste from other sectors. Experienced artists should be invited to explore new materials for murtis, such as cow dung, to create a market with sustainable alternatives to clay murtis.

Recommendations:

1. Introduction of logistics and intermediate organisations to convert the sludge into usable clay for next year so that more and more clay is not mined. The sludge derived can become a raw material of any other industry or reused as clay after proper treatment. For this intermediate body like the municipal corporation department or a private contractor should be appointed. This will increase employment and help in achieving a circular economy.
2. The murtikars should be encouraged to use this clay by offering it to them at half price. This will help in completing the cycle and closing the loop. Fresh clay is expensive but if mutikars start using used-clay then the raw material price would ultimately reduce, lowering the cost of the murtis. The recycling unit can be a private or a public intervention.

Faith and Traditions

Sri Balgangadhar Tilak invited people to collectively celebrate Ganesh Chaturthi in order to assert India's cultural independence during the British Raj. The act of reinterpreting a traditional ritual to carry a social message is also needed today. The festival thus needs to become a medium for the preservation of our natural resources.

The regulation of certain aspects of the festival, need to be accepted by religious groups, and promoted by religious and spiritual heads, as an acknowledgement of the need to keep our water bodies and environment pure.

Certain religious groups have objected to the shift from immersion in flowing waters, to a bucket immersion at home.

Other groups, have resisted the idea of recycling idols after the ritual is complete.

The fragility of biodegradable materials and the resulting damage in handling, has also invited the disapproval of some religious groups with a belief that this would result in disaster for the family worshipping a damaged idol, no matter how slight the damage.

Beliefs such as these will now need to be reviewed and reconsidered to be able to transform the festival, into an event that protects and celebrates our natural environment. It will be important that these changes in the practise of this festival are endorsed by religious groups and leaders in a spirit of positive change for the future.

COMMUNITY AWARENESS

Promotion and Communication of the Ban

Awareness should be created regarding 'FAKE' eco-friendly idols. The pointers to identify genuine from fake idols should be made available to the mass public published by MPCB or other statutory government bodies with the help of experts in the field.

ALTERNATIVES: THE WAY FORWARD

1. The ban offers some solutions, the solutions need to be explored better and alternative material like paper mache should be explored.
2. Faith and traditions – Ganesh Chaturthi was started by LokmanyaTilak to have community celebrations and cultivate the sense of togetherness in the people. In times like the

pandemic when community gathering is not possible, the option of virtual Darshan can be considered.

3. Ideal Situation of Zero waste Ganpati.
4. Contemporary artists to intervene and look for transformative options in new materials and reskilling.

SIGNED BY

eCoexist (www.e-coexist.com)

Oikos (www.oikos.in)

Ecological Society (<https://www.ecological-society.com/>)