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Ref. No. MCHI/COO/24-25/088
Date: 13/6/2025

To,

Shri Sunil Rathod

Chief Engineer (Development Plan)
Brihanmumbai Municipal Corporation
Fort, Mumbai



Subject: Circular dated May 13, 2025 bearing Ref. No. MGC/F/6526 – Mandatory Installation of Sensor-Based Air Quality Monitors and LED Displays at All Construction Sites within BMC Jurisdiction ("Circular")

Respected Sir,

At the outset, CREDAI MCHI extends its sincere appreciation for the proactive steps being undertaken by your esteemed department to mitigate air pollution through the above-referenced Circular.

We understand that this initiative arises from several key directives, including:

- i. The Hon'ble Bombay High Court's order dated January 9, 2025 in *Suo-Motu Public Interest Litigation No. 3 of 2023*;
- ii. The 28-point air pollution mitigation guidelines issued by the Hon'ble Municipal Commissioner on October 25, 2023; and
- iii. The instructions issued via AutoDCR by the Development Planning and Environment & Climate Change Department on February 7, 2025.

We wholeheartedly support this initiative as it is vital for pollution control within the Mumbai Metropolitan Region (MMR) and serves the broader public interest.

1. Observations and Submissions Regarding Implementation:

(i) Implementation Requirements:

The Circular mandates installation of sensor-based air quality monitors (measuring PM2.5 and PM10) along with real-time AQI LED displays at all construction sites within 30 days of issuance. For new projects, the installation must be completed within 15 days of receipt of the work order or commencement of construction activities.

(ii) Concerns and Suggestions:

A. Supply and Assembly Constraints:

(a) The process of sourcing components, manufacturing, and installing the mandated systems includes several stages—raw material procurement, assembly, testing, and delivery. With over 15,000 ongoing construction projects across MMR, the market is likely to face immediate saturation, resulting in unavoidable delays despite developers' willingness to comply.

(b) Annexure B of the Circular enlists only 13 approved vendors for supplying air quality monitors. This limited vendor base is inadequate to meet current demand. We request that a reasonable extension or phased implementation timeline be considered to reflect ground realities.

B. Import Dependencies:

(c) A significant portion of required components is imported, and the procurement process—including international shipping, customs clearance, and post-arrival assembly—is often delayed due to global supply chain challenges.

STATISTICS AND RESEARCH

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(d) Vendors generally begin assembly only upon confirmation of orders, further extending the timeline.

(e) The LED display specifications outlined in the Circular may require specialized manufacturing and testing setups, which are not widely available at scale, thus compounding delays.

(f) We urge your office to consider the collective demand of over 15,000 construction sites and encourage vendors to scale up production. Accordingly, we request that developers be granted a practical extension of 3–6 months from the date of order placement for compliance, enabling smooth and equitable implementation.

C. Weather Considerations:

(g) With the onset of the monsoon, sensor and display systems are susceptible to moisture-related damage. Temporary protection measures will be needed at sites. We request that your office issue guidelines for safe and phased implementation during the rainy season.

2. Recommendations for Effective Rollout:

We humbly suggest a comprehensive assessment be undertaken to evaluate total anticipated demand, stock availability, and logistical lead times. A digital monitoring dashboard on the BMC portal could be instituted to track progress and provide developers with a structured mechanism for delay notifications. Penal action, if any, may be imposed only after fair and case-specific review.

3. Commitment to Compliance and Constructive Engagement:

CREDAI MCHI reiterates its commitment to the directions of the Hon'ble High Court and the provisions of the Circular. Our aim is to ensure timely compliance through a practical and implementable framework, without compromising the larger environmental objectives.

We also offer our assistance in framing the Standard Operating Procedures (SOPs) for installation, maintenance, and monitoring of these systems. Our industry-wide insights and operational expertise can be valuable in creating a feasible and effective SOP framework.

We would be pleased to meet your team to discuss these matters further or provide any supporting data or technical inputs as required.

We remain deeply appreciative of the Municipal Corporation's ongoing efforts to promote sustainable development and protect public health. We trust your office will consider these submissions in a positive light and provide the necessary operational relaxations and exemption from penalties until SOPs are finalized and implemented.

Thanking you.

Yours sincerely,
For CREDAI-MCHI



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CC:

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