Chapter 4: Governance and Infrastructure

An efficient governance systems and sufficient human resources with technical capability are essential for successful heritage protection. The organisation and governance related issues in ASI, as discussed by various Parliamentary committees and in the previous audit Report, have been included in this chapter.

4.1 Organisation and Governance in ASI

During audit, it was noted that organisational concerns highlighted earlier continue to affect the successful governance of ASI's mandated activities. These issues are discussed in the succeeding paragraphs:

4.1.1 Recognition of ASI as Scientific Department

The ASI is a multi-disciplinary agency consisting of archaeologists, scientists, historians, engineers, architects and administrators. The *Mirdha* Committee had recommended (1984) that ASI should not be considered merely as an administrative organisation, but in view of its highly specialised functions, should be accorded the status of a scientific and technical institution enjoying autonomy in its functioning. However, after notifying it as a Scientific and Technological Department (1989), no action was taken by the Ministry/ASI to implement the declaration. The Department Related Parliamentary Standing Committee had shown concern (*vide* Report no. 99 of November 2005) over absence of further action in this regard.

In the previous Report it was pointed out that ASI had not provided information on its scientific and technical activities, functions, study and research, which were needed for its recognition as Scientific Department. The *Mirdha* Committee had concluded that, unless the ASI converts itself fully into a scientific and technical organisation, the basic role and function of the organisation will be defeated. Further effort made for recognition of ASI as a scientific organisation was not found on record during the follow-up Audit.

4.1.2 Absence of Strategy or Road-map

ASI is the custodian of 3693 monuments including many famous World Heritage Sites. The activities of ASI include exploring the country's rich past by continuously evolving archaeological narrative; preservation of monuments and archaeological sites, their development as centre-piece of education and providing an authentic cultural/historical experience for visitors. However, ASI had no road-map (long-term/medium-term) defining strategy to accomplish these mandated activities.

ASI had asked its Circle offices (January 2018) to prepare respective vision plans for a three-year period covering structural and chemical preservation, environmental upgradation, museum and tourism amenities. Examination of vision plan of Delhi

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Circle revealed that the document was prepared for selected monuments, mostly covering structural works undertaken during the year. It was also noted that the conservation activities were being undertaken on ad-hoc/annual plan basis.

Further, in Chandigarh Circle, only 10 per cent work of the vision plan was followed. In this respect, the Chandigarh Circle intimated (May 2021) that the deviation was due to following of other important conservation schemes instructed by ASI Headquarters.

Ministry/ASI while agreeing with the audit conclusion i.e. absence of mid-term/longterm conservation strategy submitted (January 2022) that three types of conservation works of CPM i.e. (i) annual repairs and maintenance, (ii) special repair, and (iii) emergency repair were being carried out by it.

Central Advisory Board of Archaeology 4.1.3

Central Advisory Board of Archaeology (CABA) was conceptualised (in 1945) as an apex body to advise ASI on matters relating to archaeology in India viz. archaeology, conservation and exploration. The members of CABA include officials from various government organisations and eminent persons from the fields of history, archaeology, culture, etc. The notification regarding continuation and induction of members of CABA for a four-year period was last issued in February 2014. As a result, after March 2018, CABA had become inactive. Further, during 2014-18, only one meeting of CABA was held in October 2014. The ASI intimated (December 2020) that the issue of reconstitution of CABA was pending with the Ministry since August 2019 which was still under process (December 2021). As such, apex level advisory for heritage conservation and for possible implementation of PAC recommendations was not available.

4.1.4 Other infrastructure and governance related issues in ASI

During audit, infrastructure and governance related issues in ASI which were affecting the effective management of monuments and antiquities were noticed and are discussed here:

4.1.4.1 Environment for Controlling Encroachment: Encroachment, unauthorised constructions in and around monuments and security of antiquities have been regularly discussed in the Parliamentary/Audit reports. At the time of the earlier Performance Audit, the number of monuments under encroachment as reported by ASI were 249, which rose to 321 in February 2021¹³. In the previous Report, it was pointed out that the position reported by ASI was incorrect as out of 3678 monuments, physical inspection of 1655 monuments i.e. 45 per cent had revealed

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Top states with encroached sites as reported by ASI-Uttar Pradesh (75), Tamil Nadu (74), Karnataka (48), Maharashtra (46), Rajasthan (22) and Delhi (11).

encroachment in 546 monuments. The follow-up audit also revealed that certain monuments found to be encroached upon in Delhi, Bhopal, Jabalpur and Kolkata Circles have not been included in the updated list¹⁴ of 321 monuments. In Aurangabad, Mumbai, Bhopal, Jabalpur, Bhubaneswar and Kolkata Circles, it was noticed that unauthorised constructions have also been carried out by government agencies.

While showing concern over this issue, PAC felt that matter of encroachment should be taken up at the highest level. It recommended, constitution of a co-ordination and monitoring mechanism to check the incidents of encroachments with the cooperation of District and Police authorities. It was, however, noted that no such coordination mechanism was available in ASI at the Central level or in Circles covered during the follow-up audit. The Delhi Circle intimated (January 2021) that records regarding any such instruction from its headquarters office was not available with it. In the Chandigarh Circle, the State Level Committee was formed only in February 2020. Further, there was absence of mechanism for periodic review of encroachment/unauthorised construction cases after their reporting by the concerned monument officials. ASI intimated (March 2021 and January 2022) that after reporting by them to the concerned authorities it is the responsibility of the District Administration to remove such encroachment and convey the same to ASI. Hence, active action from the side of District Administration and State Governments is vital for removal of encroachment or unauthorised construction. A few instances highlighting the lack of adequate response and cooperation from the District Administrations and State Governments are highlighted in the box below:

⁴ e.g. in Delhi Circle, Tomb of Razia Sultana, Vijay Mandal, *Sunehri* Masjid (all identified by ASI in September 2015 as encroached) and Moth-ki-Masjid, *Chor* Minar, Tombs of Kale Khan, Bade Khan, Bhure Khan, (all declared by NMA in 2019 as encroached) were not included in the list of encroached monuments provided to Audit by ASI.

At Bhopal Circle, pre-historic rock shelters of Bhimbetka, Tomb of Mohammad Ghaus and at Jabalpur Circle, group of temples, Amarkantak, Matangeshwar Temple, Shantinath Temple, Khajuraho, Gond Fort were found under encroachment. Similarly, in Kolkata Circle, Motijheel Mosque, Dubdi Monastery and Currency Building were encroached but not included in the list of such monuments.

Encroachment and lack of co-ordination

Mehrauli Archaeological Park (Park), Delhi is an archaeological site under the control of Delhi Development Authority (DDA) which contains monuments protected by both ASI¹⁵ and Delhi Government¹⁶. NMA had conveyed to ASI (2019) that with a view to protect the historic settings of the Park, in consultation with Local Bodies/ Agencies, its development controls and guidelines need to be notified separately.

In the Park, ASI had also undertaken conservation activities in Khan-e-Shahid Tomb, though its ownership/encroachment issue was under litigation with *Waqf* Board. During a visit to the Park, it was noted that various other portions of the Park were under encroachment and poorly managed. But there was no coordination between ASI and Delhi Government to maintain the Park and to avoid future encroachments.

In Tughlakabad Fort, Delhi it was noted that the municipal agency had encroached the site by draining out the sewage water into the protected area of the monument. The action destroyed the beautification works carried around the monument.





- In the previous Report, a case of encroachment at the World Heritage Site of Bhimbetka was mentioned. The Director General, ASI had issued (2002) an order to demolish the said encroachment. However, the Circle office failed to get the encroachment demolished due to lack of co-operation from the District administration. It was noticed that after March 2016, the matter was not taken up at appropriate levels *i.e.* Ministry or State Government.
- In the previous Report, it was highlighted that Karnataka Government, vide a notification issued in 1976, declared 43 CPM in the State as properties of *Waqf* Board. The issue was contested by ASI and Hon'ble Supreme Court in its order (2004) declared the State notification as null and void. During follow-up audit, it was noted that ASI was still not able to get the joint survey of these monuments with State Revenue Department to ascertain the exact protected area.
- In another case, parts of Gulbarga Fort (Karnataka) were found to be occupied by 282 families enjoying all the facilities *viz.* water, electricity, etc. from the State Government. Though, in accordance with the instruction of High Court (June 2019), directions were issued to Deputy Commissioner Gulbarga (March 2020) to remove the encroachments, action was yet to be taken.
- **4.1.4.2 Securing Antiquities:** Despite being the custodian of invaluable antiquities and activities spread all over the country, ASI had no vigilance or monitoring cell to function as a deterrence against theft of antiquities from its monuments. Even though the Central Antiquity Collection (CAC), which is the largest collection of antiquities

¹⁶ Quli Khan Tomb

¹⁵ Jamali Kamali Tomb, Balban's Tomb, *Rajon Ki Baoli*, *Gandhak Ki Baoli*

with ASI had not reported any case of loss/damage, the status could not be verified as no physical verification of its artefacts had been conducted after 2006. As of December 2021, ASI had reported theft of 17 antiquities from its monuments during 2015 to 2021 of which only three were recovered.

4.1.4.3 Monitoring System in ASI: The previous Report had pointed out inadequate Management Information System (MIS) in ASI. It was noted that a centralised information or real-time MIS was still not available in ASI (December 2021). Issuebased information *viz.* horticulture, publication, court cases, grant of non-antiquity certificate etc. was being collected from the field offices as per their requirement.

The Standing Committee of Parliament had recommended (March 2021) ASI to develop an application permitting users to report violation of rules and regulations, incidents of vandalism, encroachment, etc. It was noted that ASI had no centralised system to register online complaints/grievances of the general public on encroachments or illegal activities at its monuments and to monitor their redressal (December 2021).

It was also noted that ASI's conservation portal displaying to the general public, status of all its conservation activities was not being updated regularly. Ministry/ASI intimated (January 2022) that these activities have been shifted to its eGov portal. However, after the arrangement, information on conservation activities undertaken by ASI was not available to general public.

In addition to these concerns, non-existence/functioning of websites of some of ASI's Circles *e.g.* Delhi and Aizawl Circles (January 2022) indicates absence of transparent and effective IT based monitoring system in ASI.

4.2 Human Resources for Heritage Conservation

Issues related to shortage of human resources, cadre restructuring and non-filling up of vacancies in ASI as pointed out in previous Report were critically examined by PAC. The PAC had recommended that ASI should expedite its restructuring process and make efforts in filling the current vacancies. PAC was of the opinion that the matter needs to be pursued at the highest level. As part of the restructuring process, Ministry of Finance had accorded approval (28 April 2021) for creation of additional posts in ASI (after abolishing certain existing posts). A comparative position of human resources of the ASI as highlighted in the previous Report, noticed during the follow-up audit and after restructuring of posts (as reported by the Ministry/ASI in January 2022) is shown in **Table 4.1**:

Table 4.1: Manpower of the ASI

Classification of Posts	Sanctioned strength			Vacancy percentage			
	Previous audit	During follow-up audit	After restruct uring	Previous audit	During follow-up audit	After restructu ring	
Group A	235	233	302	41.7	41.2	55.6	
Group B	459	844	919	28.5	32.9	40.0	
Group C	1599	1197	1354	21.4	30.7	49.1	
Group D/MTS	6152	6152	6152	30.5	27.8	41.1	
Total	8445	8426	8727	28.9	29.1	42.7	

Source: Previous audit - CAG's Report no. 18 (2013), follow-up Audit-Report of the Parliamentary Standing Committee, March 2020 and Reply of the Ministry/ASI in January 2022

Note: Periods of previous and follow-up audits were 2012-13 and 2020-21 respectively.

It would be seen from the **Table 4.1**, that overall vacancy position in ASI had not improved (remained static around 29 *per cent*) and the gap further increased after restructuring. A similar comparison of vacancy in three main Branch of ASI (*viz.* Conservation, Horticulture and Science), which mainly include the technical posts (*viz.* Archaeologists, Engineers, Horticulturists and Chemists) is depicted through **Table 4.2**:

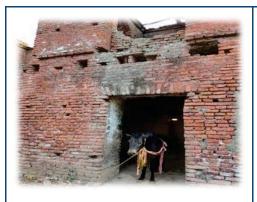
Table 4.2: Vacancies in three Branches of ASI

	Sa	anctioned str	ength	Vacancy percentage			
Branch	Previous audit	During follow-up audit	After restructuring	Previous audit	During follow-up audit	After restructuring	
Conservation	503	504	918	26.6	36.3	66.1	
Horticulture	114	114	152	7.0	25.4	47.4	
Science	140	135	134	12.1	29.6	35.1	
Total	757	753	1204	21.0	33.5	60.3	

Note: Periods of previous and follow-up audits were 2012-13 and 2020-21 respectively.

As seen from the above two **Tables**, the vacancy situation had further deteriorated at the managerial levels and across all the branches.

As already mentioned in previous Report, the shortage of staff had adverse effect on the performance and output of ASI. In Delhi Circle, it was noted that upto 24 monuments were looked after by a single Junior Conservation Assistant (Kashmiri Gate Sub-Circle). Similarly, in Aihole and Badami Sub-Circles of Dharwad Circle, 70 and 31 monuments respectively were being looked after by single Conservation Assistant. In Mumbai Circle, due to shortage of permanent staff, temporary/technical staff was used for handling sale/receipts at ticket counters. Similarly, in Kolkata Circle, 41 *per cent* posts of Monument Attendants were vacant. The shortage of staff had also led to instances of misuse and encroachment at monuments as depicted below.





Horse found stabled in Tamluk Rajbati, West Bengal

Cattle shelter at Ardh Nari Nateshwar Temple, Solapur, Maharashtra

The PAC had asked the Ministry to make concerted efforts in filling up all vacant posts in ASI and submit a compliance report within six months. Ministry/ASI in its reply stated (January 2022) that observations made by PAC for vacancy position and as shown in above Tables though factually correct was mostly on account of direct recruitment quota (89 per cent) through UPSC/SSC which was being regularly reported to them. ASI also intimated that it had brought out an internal re-structuring document to rationalise its strength in all cadres across its offices. In view of recommendation of PAC and considerable delay in filling vacancies in ASI, concerted efforts needed at the highest level to resolve human resource constraints in heritage protection.

4.2.1 Capability building in Archaeology and Museum related activities

NPC-AMASR stress on need to develop, maintain and regularly update a pool of trained and skilled conservators, artisans and craft-persons who must be engaged in and exposed to a variety of conservation activities. The PAC had also recommended ASI to address the training need of its technical staff and build capacity of its officials. Pandit Deendayal Upadhyaya Institute of Archaeology (PDUIA) and National Museum Institute (NMI) are two premier institutes of the Ministry for providing higher education and building professional manpower in archaeology, history, geology, anthropology and museology. The Institute of Archaeology, nodal office for capacity building of ASI, organises short-term professional training-cumworkshops for in-service personnel in the field of archaeology. In addition to this, National Research Laboratory for Conservation of Cultural Property at Lucknow, Uttar Pradesh also organises six months' conservation course.

It was noted that all 45 posts (under different categories) in the Institute of Archaeology, as mentioned in the previous Report were not filled and lapsed due to delay in framing of Recruitment Rules. Further, enrolment for higher studies was not forthcoming at the National Museum Institute. During 2013 and 2015-17, no student was enrolled for its PhD (Doctor of Philosophy) level courses in History, Conservation and Museology. In this regard, NMI stated (December 2021) that due

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to UGC regulations restricting number of PhD students under a professor, availability of only five teaching faculty for three NMI PhD courses and minimum time of three years for completing the research work, it was not in a position to invite applications for the course every year.

With the establishment of Indian Institute of Heritage (refer Para 1.3), it is expected that gaps in technical capability for heritage conservation will be addressed. Ministry in a press statement (July 2021) had also stated that setting up of the Institute will impact higher education and research in India's rich heritage and its conservation 17. ASI in response stated (January 2022) that it was further strengthening its capacity building programme.

4.2.2 Manpower Management of Museums

It was reported in the previous Report that all the national museums were under staffed. The details of sanctioned strength and vacant posts in museums during follow up audit are given in **Table 4.3**:

Previous audit Follow up audit Museum **Sanctioned** Vacancy **Sanctioned** Vacancy Vacancy Vacancy strength percentage strength percentage National Museum, 276 122 44.2 174 20.7 36 New Delhi 39 166 23.5 140 46 32.8 Salarjung Museum, Hyderabad Indian Museum. 209 60 28.7 209 123 58.9 Kolkata Victoria Memorial 176 30.1 175 53 94 53.7 Hall, Kolkata 257 45 17.5 254 **Asiatic Society** 81 31.9 Kolkata

Table 4.3: Vacancies in National Museums

As seen from the above Table, except for the National Museum, New Delhi, the vacancy situation had further deteriorated in other national level museums.

4.3 Working of Circles and other offices in ASI

Conservation of monuments is a multi-disciplinary process which does not limit itself to the intervention within the structure/fabric of the monument but also includes protection and maintenance of the setting or environment integral to its existence. While most of the mandated conservation related activities of ASI are carried out through its Circle offices, for horticulture and chemical conservation,





¹⁷ Institute is being set up at Noida, Uttar Pradesh by integrating Institute of Archaeology, School of Archival Studies under National Archive of India, National Research Laboratory for Conservation of Cultural Property, National Museum Institute and Academic wing of Indira Gandhi National Centre for Arts.

specific branches have been established. Issues related to the functioning of these offices are discussed below:

4.3.1 Circle offices: ASI functions through 37 Circle offices ¹⁸ (further divided into sub-Circle) and issues related to their working have been discussed in various parts of this Report. During joint physical inspection, it was noted that information/records pertaining to heritage conservation activities *viz.* nature of conservation works carried out, expenditure incurred, photographs, details of encroachment cases etc. were available at Circle office instead of respective monument or sub-Circle. As such, Circle offices of ASI were heavily tasked with administration/conservation related information for a specific monument. The PAC and the NITI Aayog had also reported that the technical staff of ASI's Circle offices have been burdened with administrative work including handling of court cases.

As noted by the PAC, these additional responsibilities significantly reduced the time available with the ASI staff (already short in strength) for their prime responsibility of heritage conservation.

4.3.2 Science Branch: The Science Branch of ASI was involved in the chemical conservation/treatment of monuments/excavated objects and air-quality monitoring at selected monuments. The work is being executed through a network of Division/Zonal offices and labs. Issues related to the working of Science Branch are given below:

- In the Western Zone of the Science Branch, Aurangabad, due to absence of specific guideline or criteria, chemical treatment in many monuments was never taken up.
- In Bhubaneswar Circle, Science Branch never conducted inspection of 44 monuments to assess requirement of chemical treatment/cleaning during 2014-15 to 2019-20.
- In respect of Delhi Zone office of the Science Branch, the office, earlier located at Red Fort, was shifted (June 2019) by ASI along with its labs ¹⁹ to Greater Noida without ensuring provisions to establish its labs there. As a result, the Zonal office was working with temporary labs (January 2021) by again shifting its equipment back to Red Fort.
- Similarly, in Mysuru office, average 18 annual inspections (*i.e.*8.65 *per cent* of 218 monuments under Bengaluru and Hampi Circles) were carried out to assess requirement of chemical treatment. As a result, 191 monuments have not been chemically treated during the period 2014-15 to 2019-20.

¹⁸ Status as of January 2022

¹⁹ Archival Conservation Laboratory and Antiquity Treatment Laboratory

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Ministry/ASI stated (January 2022) that the office of Science Branch, Delhi had now been established at Delhi location for effective monitoring. It also submitted that the selection of monuments for chemical conservation were undertaken in consultation with respective Circles as per their requirement and availability of resources.

4.3.3 Horticulture Branch: The Horticulture Branch of ASI, with its four Divisions, was associated with maintenance of two types of gardens (1) monuments having gardens around them as part of their original design, and (2) gardens to beautify the landscape of monuments/structure not part of original concept. The Branch, which came into existence in 1950 with eight gardens located around monuments at Delhi and Agra, now maintains 583 gardens including 25 heritage gardens. During follow-up audit, the Horticulture Branch of ASI was found understaffed (refer Table 4.2) and the vacancy percentage had increased from 7 to 25 in comparison to previous Report. It was also noticed that Horticulture Branch was not being consulted by Circle offices in obtaining information about monument sites which included gardens according to their original designs. (refer Para 7.2.3 for issues related with management of heritage gardens). Ministry/ASI stated (January/February 2022) that horticulture works, as and when undertaken at the archaeological sites, were decided amicably by in charge of garden branch and Circle office. It intimated that apart from restructuring of Horticulture Division, appropriate orders have been issued to ensure their unison with Circle offices.

4.3.4 Epigraphy Branch: The Epigraphy Branch of ASI deals with the decipherment and interpretation of inscriptions found on stone or metal tables or clay rocks. After deciphering and transcribing the inscriptions on stone, copper-plate and other materials (written in Sanskrit, Dravidian and other languages), these are listed in the Annual Report on Indian Epigraphy. As pointed out in the previous Report, there was no Act/Rules/Guidelines pertaining to the Epigraphy Branch. Further, the post of Director in the Directorate of Epigraphy, Mysuru was vacant since 2006. In addition, all the posts of Superintending Epigraphist (Sanskrit), Dy. Superintending Epigraphist (Dravidian) and Dy. Superintending Epigraphist (Sanskrit) were also vacant, which had resulted in slow progress of work in the Branch. The Annual Reports of the Branch for the years 2005-06 to 2012-13 were pending for publication. The unsold publication of Epigraphy Branch had also increased from ₹53.17 lakh (reported earlier) to ₹76.54 lakh. Ministry/ASI in its response provided (January 2022) details of some efforts made towards filing the vacancy in Epigraphy Branch *viz.* promotion and advertisement of posts.

4.3.5 Publication Division: The Publication Division of ASI, operating through its 107 sales counters, had no Policy for opening/closing of publication counter at CPM. In 14 ASI Circles (some having World Heritage Sites), publication counters were not available²⁰. *Taj Mahal*, Agra operating through its two gates (Eastern and Western) and attracting maximum number of visitors, had only one sales counter at its Eastern Gate. Similarly, Jaipur Circle, with many monuments and large tourist attractions,

²⁰ Aizawl, Amaravati, Hampi, Jabalpur, Jhansi, Jodhpur, Leh, Meerut, Nagpur, Raiganj, Rajkot, Ranchi, Sarnath and Tiruchirappalli (position in February 2021). The number of sales counter reported in January 2022 were 111.

had only one publication counter. On the other hand, despite nil or low sales, some of the existing publication counters were being continued. In Kolkata Circle, poor sale of publications had resulted in accumulation of unsold publication of ₹ 15.80 crore (March 2020) with no physical verification during 2014-15 to 2019-20. Ministry/ASI stated (January 2022) that it had a provision to establish sale counters in the premises of all WHS and at least one in every Circle. The reply was however silent on audit observations regarding absence of any publication counter in some Circle. ASI reported (February 2022) about its decision to consider all sales counter of ASI publication throughout the country and monitoring of sales/stocks through software being created for the purpose. In respect of sales counter at Taj Mahal, it informed that its location was suitable for visitors from both gates. ASI also submitted that verification of publication in Kolkata Circle was delayed due to shortage of staff and finally done in 2021.

4.4 Appointment of Members in National Monument Authority

NMA was mandated to function through a Chairman, five Whole-time Members, five Part-time members and a Member Secretary. Non-filling up of various posts of NMA was one of the focus area in the previous Report. In this regard, the PAC had also asked the Ministry to evolve a proper system to fill vacancies in important positions in a time-bound manner. During follow-up audit, it was noted that in NMA, 80 per cent posts of Whole-Time and Part-time Members were vacant²¹. In this regard, NMA stated (December 2020) that it was in the process of filling up the vacant posts. However, in December 2021, while updating the status, NMA reported there was only one Part-time Member posted and no Whole-Time Member. This absence of Members in NMA had further affected its mandated activities (refer Para 3.2).

Conclusions:

- > Certain areas of concern viz. requirement of strategy/road-map for heritage conservation, reconstitution of Central Advisory Board of Archaeology, filling up of vacancies, existence of a monitoring and grievance redressal system etc. needs to be addressed by the Ministry/ASI for improved working environment for heritage management.
- > Concerns related with governance, human resources and working of various subordinate offices of ASI hinder its operation.
- Recent decisions of the Government to create additional posts in ASI and establishment of Indian Institute of Heritage may help in enhancing the strength and technical capability in heritage management.

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²¹ In respect of Whole-time Members, the posts were vacant since 2019 while in respect of Part-time Members, the maximum period of vacancy was since January 2014.

Financial Management



Nalanda (Bihar)