सत्यमेव जयते

Report of the Comptroller and Auditor General of India

Follow-up on the Performance Audit of Preservation and Conservation of Monuments and Antiquities

लोकहितार्थ सत्यनिष्ठा
Dedicated to Truth in Public Interest

Union Government (Civil)
Ministry of Culture
Report No. 10 of 2022
(Performance Audit)

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Comptroller and Auditor General of India

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PREFACE

The Office of the Comptroller and Auditor General of India (CAG) had undertaken (2012-13) a Performance Audit of Preservation and Conservation of Monuments and Antiquities and the Report (No. 18 of 2013) containing the findings of the Performance Audit was tabled in Parliament in August 2013. The Performance Audit Report was discussed by the Public Accounts Committee (PAC) and several recommendations based on concerns raised by Audit were made vide its Reports No. 39 (April 2016) and 118 (December 2018).

This Report of the CAG for the year ended March 2021 is a follow-up of the previous Performance Audit Report (No. 18 of 2013). The Report contain the results of examination of the action taken by the Ministry of Culture/ASI on the areas of concern reported earlier, recommendations made by the PAC and assurance given by the Ministry/ASI. The audit was conducted during November 2020 to March 2021. Auditee units covered during the audit include Ministry of Culture, Archaeological Survey of India (ASI), National Monument Authority, National Culture Fund, National Mission on Monuments and Antiquities and six National level Museums. Seven States *viz.* Delhi, Haryana, Karnataka, Madhya Pradesh, Maharashtra, Odisha and West Bengal were selected for examining the monuments, sites and offices of ASI *viz.* Circles, Branch offices, Institute of Archaeology, Site-Museums, Monuments and Excavation sites.

The Report has been prepared for submission to the President of India under Article 151 of the Constitution and the audit was conducted in conformity with the auditing standards issued by the CAG.

Executive Summary

Introduction: Our archaeological heritage include over 4 lakh plus structures and 58 lakh plus antiquities, mostly under the control of Central and State level authorities, museums, religious bodies, etc. In view of our unique and priceless cultural and archaeological heritage, traditional knowledge, customs, and also due to rapid urbanisation a dedicated infrastructure and legislative framework to protect our archaeological heritage is important.

The Ministry of Culture is responsible for the preservation, conservation and promotion of Indian heritage and culture. The Ministry, through the Archaeological Survey of India (established in 1861), Museums, National Monument Authority and other agencies is engaged in the protection of all centrally protected monuments of national importance, excavation of historical sites, collection and showcasing of artefacts, their documentation and digitisation, etc.

The Office of the Comptroller and Auditor General of India (CAG) had undertaken (2012-13) a Performance Audit on Preservation and Conservation of Monuments and Antiquities and the Report (No. 18 of 2013) was tabled in the Parliament in August 2013. The Audit Report was discussed by the Public Accounts Committee (PAC) in its Reports No. 39 (April 2016) and 118 (December 2018). The PAC had made 25 specific recommendations after reorganising the observations in four groups *viz.* Policy, Human Resources, Financial Management and Functional Issues.

The present Report is a follow-up of previous Performance Audit. The audit was undertaken to verify the actions taken on the areas of concern reported earlier and to examine the extent of action taken on the recommendations made by the PAC. The follow-up audit was undertaken during 2020-21. Stakeholders covered during the previous audit *viz.* Ministry of Culture, ASI, National Culture Fund, National Monument Authority, National Mission on Monuments and Antiquities and various national level museums were included in the scope of follow-up audit. Seven States *viz.* Delhi*,* Haryana, Karnataka, Madhya Pradesh, Maharashtra, Odisha and West Bengal were also selected for examining the monuments and ASI offices at lower level *viz.* circles and branch offices, site-museums, monuments and excavation sites.

In the present audit report, chapters containing issues reported previously and relevant contemporary findings have been arranged in four groups as discussed by the PAC. Despite it being a follow-up audit report, efforts have been made to present the findings as an independent audit report.

Key findings: Important audit observations relating to compliance of the recommendations of the PAC and other concern areas are as below:

- Against the recommendation of the PAC, notification of rules and conservation activities under National Conservation Policy, notification of Archaeological Excavation Policy, updation of Antiquities and Art Treasure Act, modification in Ancient Monuments and Archaeological Sites and Remains Act regarding system for recording footfall was not done. Despite PAC's recommendation, there was no uniform procedure for museums under the control of the Ministry/ASI. Ministry/ASI reported that most of these exercise were under process and will be finalized during the year.

(Para 3.1)

- National Monument Authority was constituted as a statutory body (in 2011) for providing no-objection certificates for undertaking construction activities in the prohibited/regulated area of the monuments. The basic objective was implementation of the statutory provisions through preparation of Heritage Bye-Laws (HBL) and Site-Plans for each monument. However, out of 3693 Centrally Protected Monuments, HBL for only 31 monuments have been notified while finalisation of HBL for 210 monuments were at different stages *viz.* notification, consultation, etc. As such there have been considerable delay in the process.

(Para 3.2)

- ASI had no strategy or road-map (long term/medium term) to fulfill its mandate. The conservation activities were being undertaken on ad-hoc/annual basis. Central Advisory Board on Archaeology conceptualised as apex body to advise ASI on matters relating to archaeology was inactive after March 2018 and had only one meeting during 2014-18 (in October 2014). Despite recommendation of the PAC no coordination and monitoring mechanism was established at Central or Circle levels to check the incidents of encroachment.

(Para 4.1)

- With regard to human resource constraints, PAC had asked the Ministry/ASI to expedite the restructuring process of ASI and make effort in filling the current vacancies. However, overall vacancy position of ASI had remained static at 29 *per cent* since earlier audit. At management levels and in important conservation branches of ASI the position had further deteriorated.

(Para 4.2)

- After 2017-18, increase in ASI's overall expenditure and its expenditure on heritage protection activities (40 *per cent* of total expenditure) was moderate. Ministry had intimated the PAC regarding its decision to increase the budget on exploration/excavation activities to five *per cent* of the total budget. Despite

the assurance given by the Ministry, ASI's expenditure on excavation and exploration activities was still less than one *per cent.*

- To provide external budgetary funding for heritage conservation National Culture Fund was established in November 1996. The PAC had recommended that coordination between ASI and NCF should be strengthened to rope in more corporate groups and individuals into funding conservation and visitors' amenities at monuments. In this regard, against the primary corpus of ₹ 19.50 crore, endowment available with NCF rose to ₹ 76 crore by March 2021. Less than 14 *per cent* utilisation towards the objectives of NCF indicate absence of its coordination with ASI. In this regard, ASI intimated that it had prepared a shelf of around 50 works for sharing with prospective sponsors.

- In view of recommendation of the PAC, ASI had revised its ticket and other charges for monuments and had included more monuments under the ticketed category. However, there was weak reconciliation and financial control mechanism.

- National Mission on Monuments and Antiquities (NMMA) was launched by the Government (in 2007) to prepare a national database of all monuments and antiquities in the country in five years. NMMA was extended for another five year period (2012-17) and later merged with ASI. Out of 4 lakh plus heritage structures and 58 lakh plus antiquities, only 1.84 lakh monuments and 16.83 lakh antiquities have been documented so far. NMMA attributed logistical insufficiency, ineffective monitoring and budgetary constraints as the reasons for defaults in achieving the target. Audit identified absence of strategy/road-map, technical capability, mechanism to control and carry out the work as other reasons for this delay.

- Ministry had informed the PAC that categorisation of monuments in eight classified categories was completed and handed over to NMA for consideration and notification. It was noted that the process was incomplete. A list of only 915 monuments was prepared by ASI which was still under consideration.

- PAC had recommended that guidelines for determination of national importance of monuments to be finalised at the earliest and after this a comprehensive survey should be conducted to identify the exact number of monuments that can be protected. It was noted that guidelines was not prepared, no survey/review of monuments was undertaken by ASI. Instances defining absence of criteria for centrally protected monuments as reported

earlier were still existing. In this regard, Ministry/ASI informed that taking of survey is an ongoing phenomenon and the view of PAC was not relevant/possible to be implemented.

(Para 6.3)

- Discrepancies in the list of Centrally Protected Monuments and issues related with de-notification of missing monuments (as reported earlier) were still existing despite assurance that efforts would be made for their rectification. Ministry/ASI stated that the observation have been noted and corrective measures will be taken.

(Paras 6.3.3 and 6.3.4)

- Joint physical inspection of selected monuments *viz.* World Heritage Sites, Adarsh and Ticketed Monuments, Living Monuments, *Baolis*, *Kos-Minar*, etc. revealed cases of (i) absence of public amenities *viz.* public toilet, drinking water, parking, ramp, guide, security, etc. (ii) issues related with conservation works at monuments, and (iii) management of heritage gardens. In this respect Ministry/ASI stated that providing/upgrading visitors facilities is a regular phenomenon. It also intimated initiatives *viz. Adarsh Smarak*, Adopt-a-Heritage scheme for improving the facilities at the monuments.

(Para 7.1)

- At selected national level museums and site museums under ASI, concerns related with antiquity management *viz.* non-formation of Art Purchase Committees, acquisition, accession, verification, display and rotation of artefacts, their storage, preservation and security have been included and also depicted through photographs.

(Paras 8.1 and 8.2)

- PAC had asked the Ministry/ASI to draw action plan under the excavation policy and ensure adequate allocation and effective utilisation of funds for these activities. It was noted that ASI had no action plan based on its exploration and excavation policy. ASI had not centralised information/monitoring system displaying excavation proposals, their status. Writing of excavation reports was pending for more than 60 years and its expenditure on the activity was less than one *per cent.*

(Para 9.2)

Ministry/ASI was expected to take stock of its performance in view of all the previous recommendations made by Audit/PAC and also in the light of issues discussed during the present audit to bring about a holistic change in its working and performance. Ministry/ASI had also assured timely action on most of the issues included in the Report.

Follow-up on the Performance Audit of Preservation and Conservation of Monuments and Antiquities

Chapter 1: Overview

India is one of the oldest civilisation in the world. Our cultural and archaeological heritage includes customs and traditions, ancient buildings, monuments, heritage gardens, antiquities, etc. Our heritage is priceless, a source of our identity, and subject of interest for the entire humanity. The total quantum of India's built heritage and archaeological remains is estimated as four lakh plus heritage structures across the country including Centrally Protected Monuments (CPM), State protected monuments, heritage buildings under various religious trusts, historic cities and archaeological sites.

According to UNESCO[1], cultural resources of a community can also be converted into economic wealth by promoting the unique identity, traditions and cultural products. Conservation of cultural assets and traditional knowledge developed over the period are very effective in strengthening the social capital of communities. Thus, heritage conservation can be seen as a cross-cutting factor in economic and social development. The importance of protecting archaeological heritage *viz.* monuments, sites and antiquities, became a global concern after adoption of a convention in this regard by UNESCO in 1972.

Over a period of time, as a result of insensitive modernisation, urbanisation and theft, the legacy of our cultural heritage was being steadily eroded. Also many of our heritage structures are still being used in the same manner in which they continue to be kept, representing the 'living' heritage of India. In view of our specific cultural heritage, traditional knowledge and customs, conservation of monuments through a dedicated infrastructure and legislative framework is of immense importance in the country.

1.1 Legislative Framework and Infrastructure

During the British Rule, the Bengal Regulations and the Madras Regulations, of 1810 and 1817 respectively, were introduced which vested the then governments with the power to intervene whenever public buildings were under threat of misuse. The Archaeological Survey of India (ASI) was established in 1861 to initiate legal provisions to protect the historical structures all over India. Important Acts were also passed in 1863 and in 1904 which gave authority to the government for preservation

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[1] The United Nations Educational, Scientific and Cultural Organisation (UNESCO) created in 1945 is a specialised agency aimed at promoting world peace and security through international co-operation in education, sciences and culture.

of monuments. ASI draws its formal inspiration for conservation from the Indian Archaeological Policy (IAP), 1915, which mandates the conservation and protection of the monuments.

Article 51A (f) of the Constitution of India stipulates that '*it shall be the duty of every citizen of India to value and preserve the rich heritage of our composite culture*'. The Constitution has also divided the jurisdiction over these monuments, cultural heritage, and archaeological sites as below:

Union:	Ancient and historical monuments and archaeological sites and remains, declared by the Parliament by law, to be of national importance.
State:	Ancient and historical monuments, other than those declared by the Parliament to be of national importance.
Concurrent:	Besides the above, both the Union and States have concurrent jurisdiction over archaeological sites and remains, other than those declared by law and the Parliament to be of national importance.

The Ministry of Culture (Ministry) is responsible for preservation, conservation, promotion and dissemination of all forms of art and culture in the country. It ensures collection, preservation and display of antiquities through various national level museums. The Ministry, through ASI, is engaged in conservation, preservation and maintenance of the Centrally Protected Monuments (CPM) declared as being of national importance and excavations of ancient sites[2].

In addition to ASI, National Culture Fund, National Monument Authority have also been established by the Government to support the process of conservation and protection of monuments. The organisational structure available for the preservation and conservation of monuments and antiquities under the Ministry/ASI, is depicted through **Chart 1.1**:

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[2] Other monuments are protected by respective State Archaeological Department, Religious Trust, etc.

Chart 1.1: Organisational structure for heritage protection

Ministry of Culture		
Archaeological Survey of India	Attached office of the Ministry working with the objectives of exploration, excavation, survey, preservation and conservation of monuments, archaeological sites and remains, antiquities.	ASI perform its mandated role through lower level offices *i.e.* Circles, Horticulture Branch, Science Branch, Excavation Branch, Epigraphy Branch, Temple, Building and Village Survey Projects, site-museums, etc.
	Pt. Deendayal Upadhyay Institute of Archaeology	An institute under ASI for providing higher education in the field of Archaeology and related subjects.
	National Mission on Monuments and Antiquities	Constituted with the objective to prepare database (documentation and digitisation) of all monuments and antiquities in the country.
Museums	National Museum, Delhi	National level museums under the Ministry (working as autonomous bodies/ Sub-ordinate offices of the Ministry). These museums are having large collection of antiquities, manuscripts, artefacts, coins, etc. The artefacts are preserved, stored, accessioned and displayed by these museums.
	Indian Museum, Kolkata	
	Salarjung Museum, Hyderabad	
	Allahabad Museum, Prayagraj	
	Victoria Memorial Hall, Kolkata	
	Asiatic Society, Kolkata	
	Asiatic Society, Mumbai	
Other offices	National Monument Authority	Statutory Body with the mandate to regulate construction related activities in the protected/regulated areas of the notified monuments.
	National Culture Fund	Set up with a view to enable the participation and involvement of Corporate and Public Sectors in promoting, protecting and preserving the heritage.
	National Museum Institute	The institute provide courses of study, training and research facilities in different field of History, Art, Conservation and Museology.

In order to efficiently perform the assigned roles, these agencies have been provided with following important enactments and manuals:

The Indian Treasure Trove Act, 1878 - Enacted to protect and preserve treasure found accidentally but having archaeological and historical value.

The Ancient Monuments Preservation (AMP) Act, 1904 - Enacted to provide effective preservation and authority to the ASI over the monument, particularly those which were under the custody of individual or under private ownership.

Conservation Manual by John Marshall, 1923 - Contained instructions for officials to be used during conservation works of monuments.

The Ancient and Historical Monuments and Archaeological Sites and Remains (AHMASR) (Declaration of National Importance) Act, 1951 - Brought out in fulfilment of the provision of the Constitution by which all the monuments previously

protected under the AMP Act, 1904 were re-declared to be of national importance.

The Ancient Monuments and Archaeological Sites and Remains (AMASR) Act, 1958 - Enacted to provide for the preservation of ancient and historical monuments and archaeological sites and remains of national importance, for the regulation of archaeological excavations and for the protection of sculptures, carvings and other like objects. The Act was followed by AMSR Rules, 1959.

The Antiquities and Art Treasures (AAT) Act, 1972 - Enacted in September 1972 for effective control over the cultural property, consisting of antiquities and art treasures. The Act was followed by AAT Rules, 1973.

The AMASR (Amendment and Validation) Act, 2010 - The amendment made in AMASR Act prescribed the limits of regulated and prohibited area around a monument. It also provided for creation of National Monument Authority (NMA). This was followed by AMASR Rules 2011, and NMA Rules, 2011.

National Policy for Conservation of the Ancient Monuments, Archaeological Sites and Remains (NPC-AMASR), 2014 - The Policy focuses on aspects of preservation, conservation, planning, tourism, etc. in respect of monuments of national importance.

The applicable provisions of these Act/Rules have been discussed appropriately in the Report.

1.2   Report of the Comptroller and Auditor General

The Office of the Comptroller and Auditor General of India (CAG) had undertaken (2012-13) a Performance Audit of Preservation and Conservation of Monuments and Antiquities and the results of the audit was included in the Report No. 18 of 2013, tabled in the Parliament in August 2013. The audit was aimed at contributing to the process of preservation and conservation of monuments and antiquities by providing an assessment of the work being carried out by the Ministry/ASI and making suitable recommendations for improvement. The major findings of the Report are summarised in **Box 1.1**:
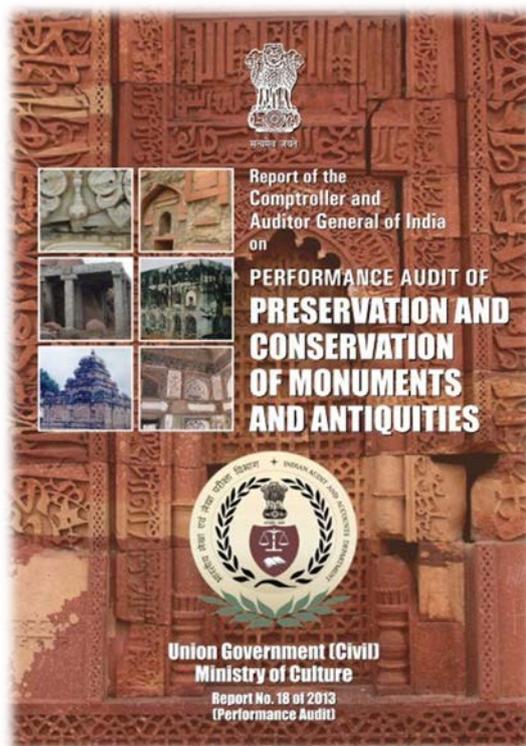
<div align="center">**Box 1.1: Major findings in CAG Report**</div>

Chapter	Brief
2	ASI did not have a reliable database of exact number of monuments under its jurisdiction. No comprehensive survey or review to identify monuments of national importance or to modify the existing list was conducted by it. Result of joint physical inspection revealed that 92 monuments declared as centrally protected were not traceable.
3	World Heritage Sites did not receive appropriate care and many cases of encroachment, unauthorised construction around these sites including absence of public amenities were reported.
4	ASI did not have a conservation policy to address the conservation and preservation requirements of monuments. For carrying out conservation works, monuments were selected arbitrarily while many monuments were never considered for any kind of structural conservation.
5	ASI did not have any policy for exploration and excavation. ASI spending on this activity was less than one *per cent* of its total expenditure. There was poor documentation of the excavation works carried out and many excavation proposals were not undertaken.
6	ASI did not have a comprehensive policy or database of the antiquities owned by it. Valuable antiquities were found stored in poor condition at national level museums. These museums were also having poor system for accession, valuation, display and conservation of antiquities.
8, 11	There was acute shortage of staff in all key positions in ASI and other organisations *viz.* museums, NMA, etc. In the functioning of ASI and museums, Ministry had failed to take action on various aspects *viz.* policy and legislation, financial management, human resources, etc.

The Audit Report of CAG (*hereafter termed as **previous Report**)* was discussed by the Public Accounts Committee (PAC), which brought out its observations and recommendations in PAC Reports No. 39 (April 2016) and 118 (December 2018)[3].

The first report of the PAC contained recommendations on 25 specific issues, of which 20 were accepted by the Ministry. Out of five remaining recommendations, PAC, in its second report, made further recommendations on four issues and decided not to pursue the remaining one. Observations and recommendations of the PAC, response of the Ministry and action taken have been suitably included in this report and also summarised vide **Annexe 11.1**.

1.3   Initiatives undertaken by ASI since previous Report

Apart from routine preservation, conservation, exploration related mandated activities, since the publication of previous Report, various new initiatives connected with heritage conservation were undertaken. Some of these post-audit initiatives (since 2013) include:

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[3]   Report was discussed by PAC of 2013-14, 2014-15, 2015-16 and 2018-19 (sixteenth Lok Sabha)

a) Engaging Google India for displaying 360^0 photography of the CPM on the web including remote sensing of archaeological sites;

b) Introduction of *JATAN* software for digitising collections in various museums;

c) Environmental Impact assessment on the structure and building materials of CPM through Air Quality Monitoring;

d) Selection of monuments as *Adarsh Smarak* to provide necessary amenities at selected monuments;

e) Launching of e-ticketing facility for providing online booking facility for visitors;

f) Portal on Must See sites of the country; and

g) Launching of Adopt-a-Heritage scheme (by Ministry of Tourism) where Monument *Mitras* were allowed to develop/maintain tourist amenities in the non-core areas of the monument.

(*Source: Annual Reports of the Ministry*)

In the Budget for the financial year 2020-21, the Government had announced establishment of an Indian Institute of Heritage and Conservation with the status of a Deemed University. A working Group under the chairmanship of CEO, NITI Aayog, with the objective to examine the management of heritage structures and sites in the country and provide a future roadmap for institutional changes and to improve management had also prepared and submitted (May 2020) its report. During the current audit process some of these initiatives were also examined to make a fair assessment of the working of the Ministry in heritage conservation.

Chapter 2: Audit Approach

In order to verify the actions following the concern areas reported earlier by Audit and to examine the assurance given by the Ministry/ASI to the Parliamentary Committee, a follow-up audit[4] of the previous Report was undertaken during 2020-21 with audit approach as discussed below:

2.1   Audit Objectives

During the follow-up audit, action taken by the Ministry/ASI on the recommendations made by the PAC were examined to assess whether:

➢   Process followed for identification, documentation, protection, preservation of monuments and antiquities was adequate;

➢   Institutional and implementation mechanism was available for ensuring effective heritage conservation;

➢   Functioning of Museums under the Ministry and site-museums under ASI was efficient; and

➢   Efficient system for financial and human resources, including internal control, mechanisms were available.

2.2   Audit Criteria

The audit criteria for the follow-up audit was derived from:

➢   PAC recommendations and Action Taken Notes (ATN) on observations raised in previous Report;

➢   Acts, Rules, Regulations, Policies and other guidelines issued for the preservation and conservation of monuments, museums, antiquities, exploration activities; and

➢   Government Orders, Rules/Regulations and other Manuals.

2.3   Audit Scope and Selection

Stakeholders covered during the previous audit *viz.* Ministry of Culture, ASI (including its circles and branch offices, site-museums and excavation sites), National Culture Fund, National Monument Authority, National Mission on Monuments and Antiquities were included in the audit scope of follow-up audit. The

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[4] CAG's Performance Auditing Guidelines, 2014, describes follow-up audit as an independent activity where the auditor examines the corrective actions, the audited entity, or another responsible party, had taken on the basis of results of previous performance audits. It is an independent activity that increases the value added by the audit process and is not restricted to the implementation of recommendations but focuses on whether the audited entity has adequately addressed the problem and remedied the underlying conditions after sufficient time was allowed for this process.

period covered was from 2013-14 to 2020-21; however, wherever required, records of earlier period were examined to draw conclusion and information updated.

Based on the observations made in previous Report, seven States *viz.* **Delhi**, **Haryana**, **Karnataka**, **Madhya Pradesh**, **Maharashtra**, **Odisha** and **West Bengal** were selected for examining the monuments and ASI offices at lower levels. Following stakeholders were covered at different levels:

Central Level:	Ministry of Culture, Archaeological Survey of India, National Monument Authority, National Culture Fund, National Mission on Monuments and Antiquities, Central Antiquity Collection, National Museum Institute and Institute of Archaeology.
National Level Museums:	National Museum (Delhi), Victoria Memorial Hall Museum, Asiatic Society, Indian Museum (all in Kolkata), Asiatic Society(Mumbai) and Salarjung Museum (Andhra Pradesh).
States Level:	Circle offices (12), Science Branch, Horticulture Branch, Excavation Branch and Custom Branch, Site-museums (23).

At the time of previous Performance Audit, out of then 3678 CPM, 1655 were selected for joint physical inspection. During the follow-up audit, to assess the preservation and conservation status, 184 CPM were selected for joint physical inspection out of the 1655 CPM selected earlier[5]. The selection, spread over seven States under different categories of monuments, is depicted in **Annexe 2.1**.

2.4   Audit Methodology

The entry conference was held with the representatives of the Ministry and ASI in December 2020 wherein the audit approach was discussed. Draft report containing audit findings, results of joint physical inspection and replies to audit questionnaires was submitted to the Ministry in September 2021. Response furnished by all the stakeholders have been considered and appropriately included in this Report.

2.5   Structure of the Report

The previous Report, divided into 12 chapters, was discussed by the PAC after reorganising observations in four groups' *viz.* Policy, Human Resources, Financial Management and Functional Issues. Accordingly, in the present audit report, Chapters containing issues reported previously and relevant findings from the current audit have been arranged in the same four groups as below:

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[5] As of December 2021, 3693 monuments have been declared by ASI as CPM

A.	Policy Level Issues	Chapter 3- Policy and Regulations
B.	Human Resources Management	Chapter 4- Human Resources Management
C.	Financial Management	Chapter 5- Financial Management
D.	Functional Issues	Chapter 6- Identification and Notification of Monuments and Antiquities Chapter 7- Monuments Management Chapter 8- Antiquities Management Chapter 9- Exploration and Excavation

Chapters one and two provide an overview of the subject and audit approach adopted during the audit process while Chapters 10 and 11 respectively present examples of good practices adopted for heritage management and summary of the report. Despite it being a follow-up audit report, efforts have been made to present the findings as an independent audit report.

2.6   Acknowledgement

Audit acknowledges co-operation and assistance provided by the Ministry of Culture and other stakeholders involved in the audit process for providing information/records. The inputs provided by field level staff during joint physical inspection were also useful in gaining an understanding of the activities related to heritage management.
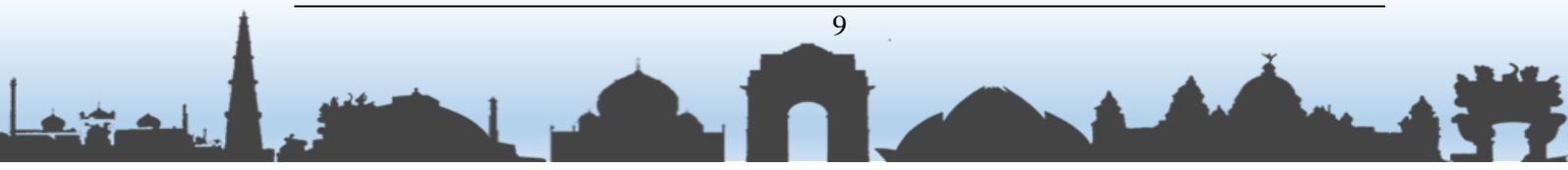
Policy and Regulations

Martand Sun Temple (Jammu and Kashmir)

Chapter 3: Policy and Regulations

Availability of appropriate Acts, Rules, Laws, and Guidelines and their contemporary relevance is a pre-requisite for preservation and conservation of monuments and antiquities. In this chapter, issues connected with policy and regulations have been discussed.

3.1   Formulation and updation of Acts, Rules and Laws

Observations on various Acts, Rules and other Laws available for preservation and conservation of monuments and antiquities discussed in the previous Report were reviewed by the PAC. PAC had made several recommendations prescribing timely formulation of new Act/Rules or updation of existing one. It was noted that the Ministry/ASI had not taken desired level of action on most of these policy related recommendation as discussed below:

A.   National Conservation Policy

The National Policy for conservation of ancient monuments, archaeological sites and remains was notified in February 2014. *The PAC had recommended the Ministry to also notify the rules under the Policy to streamline notification and de-notification of monuments and their conservation activities.* In this respect, the Ministry had intimated (April 2016) the PAC that guidelines on notification and de-notification of monuments had been drafted and uploaded on the website for public comments. However, during follow-up audit, no such document/rule was found prepared or notified by ASI.

Ministry/ASI in response intimated (January/February 2022) that guidelines on notification and de-notification of monuments were not to be issued under the Conservation Policy. It was part of Rules under AMASR Act 1958 for which a Committee was being finalised.

Audit noted that the reply was contrary to the earlier response of the Ministry. The recommended rules as envisaged by the PAC were not yet finalised and notified as of January 2022.

B.   National Policy on Archaeological Excavation and Explorations

The National Policy on Archaeological Excavation and Exploration was approved by the Ministry of Culture in March 2015. *The PAC had asked the Ministry to expedite the final notification of the Policy for Excavations and Explorations so that the public resources earmarked for these activities were properly streamlined and focused.* During follow-up audit it was noted that notification of the Excavation and Exploration Policy was not done.

Ministry/ASI in response stated (January 2022) that while notifying the said policy, certain observations pertaining to the policy being benchmarked to the international best practices and use of technology were brought to the notice of ASI by critical stakeholders including NITI Aayog. Therefore, the said policy was under review to make it more comprehensive which will be notified before the end of the financial year.

Audit noted that NITI Aayog had asked the ASI (May 2020) to revisit and update the document keeping in view changing scenarios, advancement of technology, etc. as the same was originally drafted in 2009. In this respect, ASI had intimated (December 2020 and December 2021) that this exercise was under process. As such, there have been considerable delay in updation and finalisation/notification of National Policy on Archaeological Exploration and Excavation.

C.   Antiquities and Art Treasures (AAT) Act

The PAC was concerned that the process for amending the AAT Act, which started in 1997, was pending even after a lapse of two decades. It desired that the Ministry expedite the amendment in the respective Act. In this regard, the Ministry had informed the PAC that in order to make the Act simple, implementable and effective, a committee to suggest suitable amendment or framing of a new draft was constituted. Subsequently, ASI intimated (August 2017) through ATN that in place of AAT Act, 1972, draft of two new Acts *i.e.* The Antiquities and Art Treasure (Export and Import Control) Act, and Antiquities and Art Treasure Act was prepared and submitted to the Ministry for consideration. However, after recommendation of the Ministry of Law, it was preparing a revised single Act clubbing the two Acts.

While responding to progress on the Act, ASI clarified (December 2020 and December 2021) that the exercise was a time taking process requiring meticulous discussions and deliberation.   ASI while accepting the facts further stated (January 2022) that it was working in consultation with the Ministry on amendments to be carried out under the AAT Act, 1972. It also submitted that the work was likely to be completed in year 2022. The fact remains that despite instruction of PAC, exercise was still ongoing since 1997.

D.   Ancient Monuments and Archaeological Sites and Remains (AMASR) Act

PAC had asked the Ministry to carry out necessary modifications in AMASR Act and put in place a system of recording footfalls in non-ticketed monuments and to resolve the issue of delay in categorisation of monuments. It was noted that necessary amendment in AMASR Act had not been made and the issue of categorisation of monuments was pending (*refer Para 6.2.1*). Further, there was still no system of recording footfalls in non-ticketed monuments (*refer Para 5.3.1*).

Ministry/ASI in its reply (January 2022) submitted that the Bill to amend the AMASR Act, 1958 was placed before the Parliament in January 2018. The Lok Sabha passed the Bill on 02 January 2018 but Rajya Sabha referred the said Bill to Select Committee. After various deliberations, the Bill was recommended by the Select Committee. However, the said Bill was lapsed due to dissolution of the Parliament. It informed that at present, final details of the amendments were being worked out.

E. Uniform procedures for Archaeological Museums and Management of Antiquities

The PAC had noted that comprehensive policy guidelines addressing all issues related with management of antiquities viz. acquisition, accession, custody, rotation, etc.at museums under the control of the Ministry and also for site-museums under ASI was not available. Ministry had informed the PAC about following steps being undertaken by it:

➢ *drafting and finalisation of uniform policy for acquisition of art objects;*

➢ *constitution of committee to work out uniform security policy; and*

➢ *constitution of committee to prepare standard manual of procedures.*

PAC was of the view that artefacts of culture and cultural excavations are the pristine cultural glory of any nation and therefore it recommended that the Ministry should expedite the implementation of a uniform procedures for all museums.

Audit noted that no uniform procedure for museums under the control of the Ministry/ASI covering all issues as recommended by PAC was available. ASI initially stated (March 2021) that preparation, modification and following of such document would be based on the direction of the Ministry. Audit however noted that no such document/direction was available from the Ministry. ASI further stated (January 2022) that its site-museums were different from other national level museums and as such their acquisition policy may not be fit for the museums under ASI. The reply only indicates the need for a comprehensive policy for ASI's site museums.

E.1 Guidelines for Site-museums under ASI

ASI, in response to *PAC remark regarding absence of guidelines for site-museums,* intimated (November 2020) that guideline for ASI museums prepared in 2013 was being followed by it. ASI further intimated (March 2021) that issues like accession register, rotation, etc. have been covered in the 14 points museum reforms by the Ministry (issued in 2009).

Audit, however, noted that ASI guideline was not a comprehensive document for addressing all issues related with management of antiquities. The replies were also
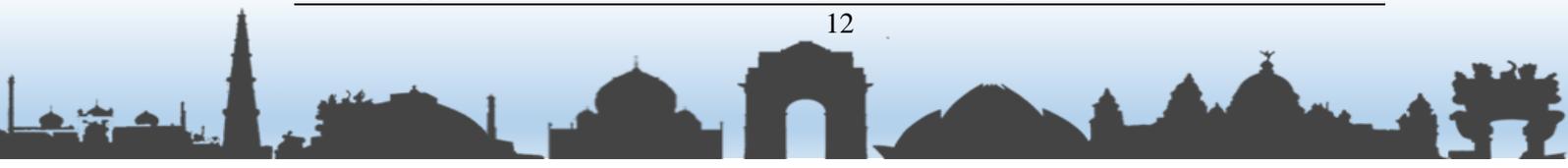
not tenable as both the documents *i.e.* guidelines for ASI museums and 14 points museum reforms were available at the time of PAC meetings. The PAC, while making its recommendation (in 2016), would have taken into consideration these documents. As such, the reply ignore the PAC contention regarding requirement of a single comprehensive document for management of antiquities, which was initially accepted by the Ministry for compliance.

In January 2022, Ministry/ASI while reiterating its earlier reply stated that the guidelines prepared in 2013 and 14 points museum reform suffice requirements of its site-museums. However, keeping in view the observations of PAC a comprehensive policy is being finalised.

3.2   Preparation of Heritage Bye-Laws (HBL) and Site-Plans

The National Monuments Authority (NMA) was constituted as a statutory body (2011) under the provisions of AMASR (Amendment and Validation) Act, 2010 to regulate the construction activities around the Centrally Protected Monuments (CPM). Its basic objective was implementation of the statutory provisions of prohibited and regulated areas of CPM through Heritage Bye-Laws (HBL). NMA was to exercise and discharge its power (*i.e.* providing no-objection certificates for undertaking construction activities in the prohibited/regulated areas of CPM) through Competent Authorities notified by the Central Government[6]. During the follow-up audit, it was noted that progress of NMA in respect of some mandated activities was slow. These issues are discussed in succeeding paragraphs:

3.2.1   Preparation of Site-Plans: The Heritage Bye-Law was to be framed on the basis of Site-Plan for prohibited and regulated areas of each protected monument. According to AMASR Rules 2011, within a period of five years, the Director General, ASI was to make endeavour for the purpose of preparing detailed Site-Plans. However, in another notification issued in 2018, this period was extended to ten years (till 2021). Consequently, preparation of Site-Plans and the finalisation of HBL had also been delayed. NMA intimated that survey plans for 600 monuments had been prepared. In this regard ASI intimated (February 2022) that the job was being outsourced, however complex ground conditions, spread of monuments and size of monuments, etc. delay the process. Fact remains that preparation of HBL for all monuments had been delayed.

3.2.2   Preparation of HBL: Under the provision of AMASR (Amendment and Validation) Act, 2010, NMA was to notify monuments-specific HBL. In this respect, five Regional Directors of ASI were identified (February 2014) for preparation of draft HBL for approval of NMA. However, only five HBL covering 31 protected

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[6]   32 Competent Authorities were notified by the Government in February 2014.

monuments have been notified so far (January 2022) while 165 HBL involving 210 monuments were reported to be at various stages of finalisation[7].

3.2.3   Priority in preparation of HBL: On the basis of number of applications received for construction related activities, NMA had identified 230 out of 3693 CPM as being most priority for preparation of HBL. However, as intimated by NMA (December 2020), out of total monuments notified/under process, so far only seven pertain to the list of most priority monuments.

3.2.4   Preparation of Guidelines for Large Projects: NMA was to issue detailed guidelines for archaeological impact assessment of large scale development projects. Further, the Authority was to make recommendations for restoration of the cultural landscape, which had been damaged due to construction or like activities in the past. With reference to preparation of guidelines for large projects, NMA intimated (November 2020) that for applications having total built up area of 2000 sqm and above, additional information were being obtained in prescribed format while for cases having built up area of 5000 sqm or above, archaeological impact assessment reports were being obtained. It also submitted that while formulating HBL, cultural landscape aspect of monuments were kept in mind and as such related landscape restoration exercise for the CPM was not being conducted. Audit is of the view that in the absence of guidelines and preparation/notification of few HBL, the exercise of processing of applications for construction related activities was on ad-hoc basis.

NMA intimated (January 2022) that onus of preparation of HBL primarily lies with ASI which was to be prepared on the basis of surveys and site-plans by its officials *i.e.* Circles and Regional Directors in ASI. The role of NMA was to place them before the Authority for approval and laying before the Parliament. The fact remains that there have been considerable delays in the preparation of HBL and Site-Plans. As a result, permission for construction related activities in prohibited/regulated areas of CPM were being provided by treating the application as requests for permission under exceptional grounds[8] provided in NMA Rules.

> **Construction activities in prohibited Area of Humayun's Tomb Complex**
> The AMASR Act was amended in 2010 by introducing the constitution of NMA and defining its role in giving permission for renovation and construction related activities in prohibited/regulated area of the monuments[9]. As per Para 20C of the amended Act, any person, who owns any building or structure, which existed in

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[7] Two HBL covering 2 CPM sent to Ministry for laying in Parliament (in September 2020), 103 HBL covering 128 monuments under consultation and 60 HBL covering 80 CPM uploaded on website for inviting suggestions.

[8] Under Rule 15 of NMA Rules, 2011, in exceptional cases, pending the finalisation of the Heritage Bye-Laws, permission for construction related activities can be granted.

[9] In terms of power conferred under Rule 31 of the AMASR Rules, 1959, and notification issued in June 1992, ASI had declared areas upto 100 meters from the protected limits of the monument and further beyond 200 meters to be prohibited and regulated areas respectively. The concept of prohibited and regulated area got further elaborated with the amendment in AMASR Act, 2010.
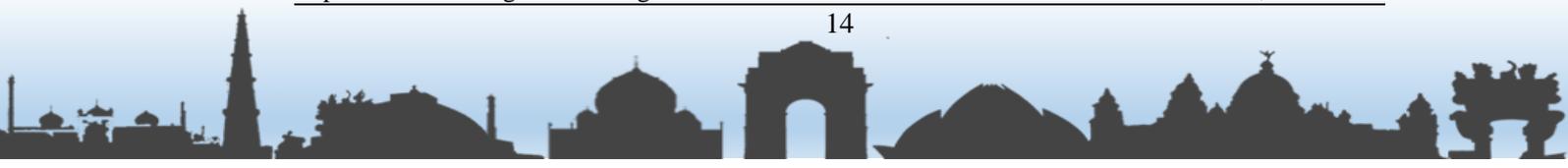
prohibited area of the monument may make an application for carrying out such repair or renovation, as the case may be. Further, according to Para 20A, no person, other than an archaeological officer, shall carry out any construction in any prohibited area, keeping in view the facts that-

(a) it is necessary or expedient for carrying out such public work or project essential to the public; or

(b) such other work or project in its opinion, shall not have any substantial adverse impact on the preservation, safety, security or, or access to, the monument or its immediate surrounding.

During physical inspection (January 2021), it was noticed that a project for creation of modern structures *e.g.* construction of shops, landscaping, underpass, conservation etc. was being undertaken in prohibited area of Humayun's Tomb, Delhi by agency other than ASI.

ASI in a reply (August 2021) informed that it was associated with the project through a multi-agency MoU[10] signed in July 2007 (later extended in December 2017). According to the MoU, apart from conservation activities (including creation of site-museum and interpretation centre), the Trust[11] (executing agency) was to carry out various urban development activities (including creation of shops and restaurants) in consultation with CPWD.

Audit pointed out (June 2021) that the interventions were not creation of facilities (*viz.* toilet, water, parking etc.) for visitors of the monument and by allowing commercial construction (e.g. shops) to another agency in prohibited areas of the

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[10] In 2007, MoU was signed between ASI, CPWD, MCD (as Public Parties) and Aga Khan Trust for Culture (AKTC), Aga Khan Foundation India (AKFI) (as Private Parties). The initiative had three components *viz.* (1) Heritage Conservation (2) Socio Economic Initiative, and (3) Environmental Development. In 2017, while extending the period of MoU, a Trust Deed was signed by CPWD, ASI, SDMC, AKFI and AKTC.

[11] According to MoU, a Trust *viz.* Government Sunder Nursery Management Trust was created.

monument, ASI had not adhered to provisions of the AMASR Act. Further, according to MoU, only the ownership of interpretation centre to be built by the agency was to vest with ASI.

ASI in response stated (August 2021) that AMASR Act (Section 20A(3) authorised it to construct amenities in the prohibited/regulated area of a CPM and creation of interpretation centre, souvenir shops, underpass, etc. being constructed by the ASI through Aga Khan Trust (Private Party) were essential amenities for tourists visiting the World Heritage Site. It also informed that necessary approval from NMA regarding construction of interpretation centre was obtained by it in November 2014. ASI while reiterating to its earlier reply to the follow-up report stated (January 2022) that the MoU was signed after due approval of the Government.

Reply of ASI was not tenable, as NMA had communicated[12] to audit that they have not received any application for development of museum and shopping complex within the prohibited area of Humayun's Tomb Complex. During extension of MoU in December 2017 also, this issue was not brought to the notice of NMA.

By entering into MoU and without the approval of NMA, allowing the Trust to carry out construction works, ASI had not followed the provisions of AMASR Act.

Conclusions:

- ➢ *The recommendations made by PAC were essential for effective heritage management. However, in most cases, the exercise to carry out necessary amendment/notification on policy related areas of concern discussed by the PAC were still in process.*
- ➢ *There was delay in preparation of Heritage Bye-Laws to regulate construction related activities in prohibited/regulated areas of the monument despite constitution of National Monument Authority (NMA) in 2011.*

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[12] Vide letter No. 9-1/2020-NMA (Admn) dated 24th March 2021.

Human Resources Management

Ajanta Caves (Maharashtra)

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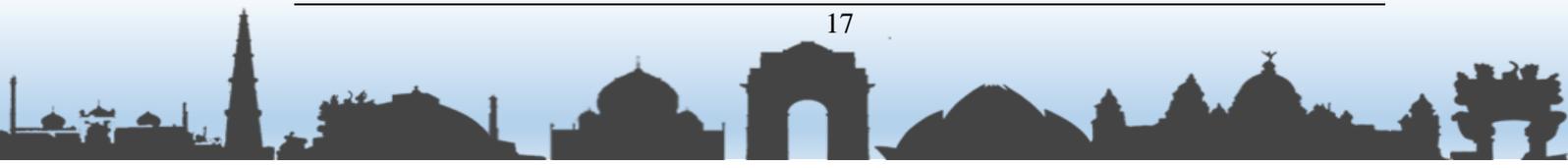
Circle revealed that the document was prepared for selected monuments, mostly covering structural works undertaken during the year. It was also noted that the conservation activities were being undertaken on *ad-hoc*/annual plan basis.

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/long-term 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.

4.1.3   Central Advisory Board of Archaeology

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 2021[13]. 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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[13] 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 list[14] 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 co-operation of District and Police authorities. It was, however, noted that no such co-ordination 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:

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[14] *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.
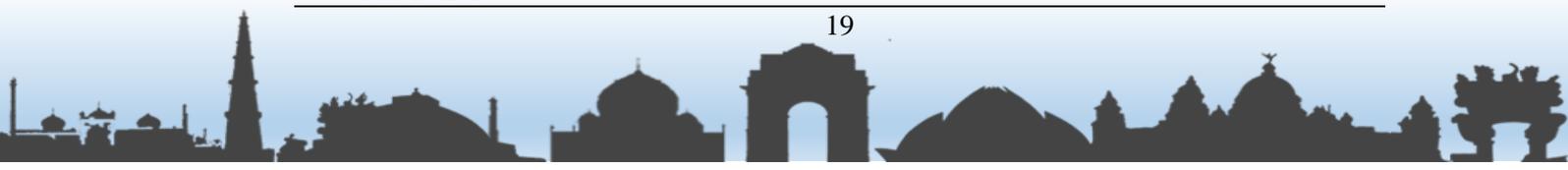
Encroachment and lack of co-ordination

➤ Mehrauli Archaeological Park (Park), Delhi is an archaeological site under the control of Delhi Development Authority (DDA) which contains monuments protected by both ASI[15] and Delhi Government[16]. 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

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[15] Jamali Kamali Tomb, Balban's Tomb, *Rajon Ki Baoli*, *Gandhak Ki Baoli*
[16] Quli Khan Tomb

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). Issue-based 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 restructuring	Previous audit	During follow-up audit	After restructuring
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

Branch	Sanctioned strength			Vacancy percentage		
	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.
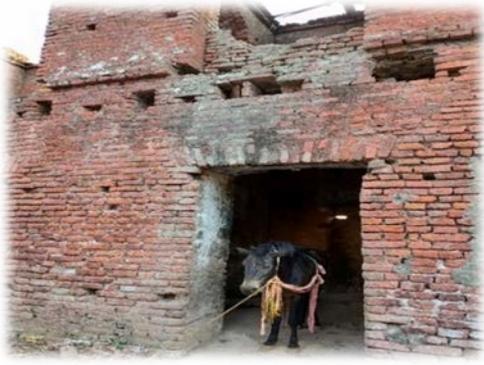
Horse found stabled in Tamluk Rajbati, West Bengal	**Cattle shelter at Ardh Nari Nateshwar Temple, Solapur, Maharashtra**

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-cum-workshops 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

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**:

Table 4.3: Vacancies in National Museums

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

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,

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[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.

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[18] Status as of January 2022
[19] Archival Conservation Laboratory and Antiquity Treatment Laboratory

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 under-staffed (*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 available[20]. *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,

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[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 vacant[21]. 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)

Chapter 5: Financial Management

India's cultural heritage is not only an important marker of her past but also provides an opportunity for generating employment and income through heritage tourism and local development. Accordingly, Ministry allocates funds to ASI and Museums for heritage conservation. National Culture Fund and Adopt-a-Heritage Project have also been introduced for external budgetary funding through the corporate sector.

5.1   Expenditure and Receipts from Conservation Activities

ASI's overall expenditure, expenditure on conservation related activities, and receipts from the monuments and annual *percentage* growth during the period 2014-15 to 2020-21 are depicted in **Table 5.1**:

Table 5.1: Expenditure and Receipts of ASI

(₹ in crore)

Year	Budget Estimates	ASI's overall expenditure		Expenditure on conservation, maintenance, amenities, etc.		Revenue earned from tickets, etc.[22]	
2014-15	680.05	629.27		247.23		102.23	
2015-16	712.28	686.96	(9.2)	251.31	(1.7)	103.38	(1.1)
2016-17	680.63	768.70	(11.9)	311.25	(23.9)	227.55	(**120.1**)
2017-18	924.37	939.94	(22.3)	424.46	(36.4)	256.63	(12.8)
2018-19	974.56	962.17	(**2.4**)	419.81	(**-1.1**)	322.83	(25.8)
2019-20	1036.40	1003.4	(**4.3**)	444.84	(**6.0**)	343.61	(6.4)
2020-21	1246.75	849.94	(-15.3)	272.50	(-38.7)	47.62	(-86.1)

Note:
1. Figures in parenthesis indicate annual percentage growth with respect to previous year.
2. Conservation expenditure include expenditure on maintenance and amenities.
3. During 2020-21, due to Covid19 pandemic, ASI's monument related activities were less.

During the period 2014-15 to 2020-21, ASI's average expenditure on conservation, maintenance and public amenities related activities was around 40 *per cent* of its overall expenditure. As is evident from **Table 5.1,** after 2017-18, growth in ASI's overall expenditure and its expenditure on heritage protection activities was moderate. The budgetary allocation of ASI had been reduced from ₹1246.75 crore in 2020-21 to ₹1042.63 crore in 2021-22.

As pointed out in previous Report, ASI was not maintaining specific budget for activities related to awareness, interpretation and creation of public amenities at its monuments. Expenditure on these accounts was being incurred from the funds

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[22] Receipts from sale of tickets, publication, horticulture, etc. recorded as other receipts in Consolidated Fund of India under the head 0202-04-800 (Art and Culture).

allocated for conservation activities. Ministry/ASI in response stated (January 2022) that the fund requirement for awareness and interpretation centres was met by it through Budget Heads 'Advertisement and Publicity' and 'Museums and Conservation activities' respectively. Fact remains that due to absence of specific Budget Head for public amenities, amount of actual expenditure on heritage conservation was not ascertainable.

It was also noticed that the Circles had not prepared comprehensive plans for providing basic amenities at the monuments resulting in absence of these facilities as discussed in the succeeding part of the report.

In respect of revenue, during 2016-17, the growth of 120 *per cent*, could be attributed to revision of entry fee (April 2016) and introduction of e-ticketing process by ASI (December 2015) which provided better accounting and transparency in receipts. However, this growth in revenue was not evident after further revision of ticket rates (in August 2018) and after inclusion of 27 more monuments (in April 2019) in the ticketed category. In response to reason for dissimilar growth in receipt, ASI submitted (January 2022) that this may have been due to lacunae in reconciliation procedure. It further intimated that necessary steps had been initiated and were being further improved upon to carry out reconciliation of e-ticketing revenue receipts.

5.1.1 Expenditure on Excavation and Exploration

The two main functions of ASI are conservation and investigation. excavation and exploration form the major research component of field archaeology. *The PAC had noted that the ASI was spending less than one per cent of its expenditure on excavation and exploration activities. It recommended adequate allocation and effective utilisation of funds for these activities. Ministry had also communicated to the PAC regarding its decision to increase the budget on exploration/excavation activities to five per cent of the total budget in first phase.* Expenditure incurred by ASI on excavation and exploration activities during the period 2014-15 to 2020-21 is depicted in **Table 5.2** below:

Table 5.2: Expenditure on Excavation and Exploration Activities

(₹ in crore)

Year	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
ASI's overall expenditure	629.27	686.96	768.70	939.94	962.17	1003.40	849.94
Expenditure on excavation and exploration	4.34	5.48	3.61	5.29	6.18	3.56	2.48
Percentage expenditure	0.69	0.80	0.47	0.56	0.64	0.35	0.29

However, as evident from the **Table 5.2,** ASI's expenditure on excavation and exploration activities was still less than one *per cent* of its total expenditure and in

fact had come down from 0.80 *per cent* in 2015-16 to 0.35 *per cent* in 2019-20. ASI stated (December 2021) that during 2020-21, due to cap on expenditure imposed by Ministry of Finance, expenditure on excavation and exploration activities was reduced. Further, in January 2022, Ministry/ASI stated that the recommendations made to enhance the allocation had been taken on board. However, due to Covid19 situation, pace of work could not be expedited. It submitted that ASI was now focussing on excavation by re-appropriating funds from regular budget and enhancing allocation from the year 2021-22. Fact remains that, commitment communicated to the PAC regarding increase in expenditure on excavation activities was not honoured by the Ministry/ASI during 2014-15 to 2020-21.

5.1.2 External Budgetary Funding for Heritage Conservation

The National Culture Fund (NCF) was established (November 1996) by the Ministry, with the primary mandate to establish and nurture partnership between private and public sectors for heritage conservation[23]. The concept was a departure from the previous implementation strategies that viewed Government to be solely responsible for culture related endeavours in the country. One of the objectives of NCF was to administer and apply its funds for conservation, maintenance, promotion, protection, preservation and up-gradation of monuments. *The PAC had recommended that co-ordination between ASI and NCF should be strengthened to rope in more corporate groups and individuals into funding conservation and visitor amenities at monument sites.* The availability and utilisation of funds (including funds under the Corporate Social Responsibility (CSR)[24], under NCF during the period 2013-14 to 2020-21 is depicted in **Table 5.3**:

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[23] For sponsoring the projects, 100 *per cent* tax rebate under Section 80G of the Income Tax Act was provided by NCF.

[24] Corporate Social Responsibility - As per Section 135 of the Companies Act 2013 - Every company having net worth of rupees five hundred crore or more, or turnover of rupees one thousand crore or more or a net profit of rupees five crore or more during any financial year shall ensure that the company spends, in every financial year, at least two per cent of the average net profits of the company made during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy on the activities as specified in Schedule VII of the Act. During the period 2014-15 to 2020-21, only ₹ 2489 crore was earmarked on Heritage, Art & Culture out of total expenditure of ₹ 121412 crore under CSR and ₹ 53.26 crore was received by NCF/ASI. (*Source: CSR Portal-Ministry of Corporate Affairs*).

Table 5.3: Availability and utilisation of funds of NCF

(₹ in crore)

Description		13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21
Balance fund at the end of the year	Corpus*	39.19	41.33	43.69	46.15	47.77	50.52	54.33	56.71
	Endowment	15.06	14.95	23.91	25.08	26.49	64.53	58.83	19.15
	Total	54.25	56.28	67.60	71.23	74.26	115.05	113.16	75.86
Funds utilised during the year, towards	Admn.	1.00	0.85	0.92	0.71	0.36	0.77	0.56	0.33
	Objectives of NCF	2.32	2.48	3.77	1.32	4.45	8.12	40.61	10.25
Percentage utilisation of funds towards objectives of NCF/Total		4.28	4.41	5.58	1.85	5.99	7.06	35.89	13.51

*includes primary corpus of ₹19.50 crore, interest earned thereon and surplus

It would be seen from the **Table 5.3** that primary corpus of NCF (*i.e.* ₹ 19.50 crore) had increased significantly to ₹ 56.71 crore (period ending March 2021). However, barring the year 2019-20, funds available under the corpus were not being used primarily to meet its objectives and the *percentage* utilisation of available funds towards objectives of NCF was also low. In the previous Report, it was recommended that ASI needs to prioritise its projects requiring funding through NCF and a comprehensive assessment of funds was to be carried out for this purpose. However, continued accumulation of funds of NCF indicates an absence of such co-ordination and planning while ignoring the audit recommendation.

Ministry/ASI in response stated (January 2022) that to strengthen coordination between NCF and ASI, a shelf of around 50 works to be shared with prospective sponsors had been prepared. Meetings of Project Implementation Committee which were pending for long were also being held regularly.

5.1.3 Other funding arrangements for Heritage activities

The Three Years (2017-20) Action Agenda Report of NITI Aayog (issued in August 2017) mentions that despite a large number of foreigners travelling to India to learn more about our culture and ancient civilisation, low levels of funding and poor maintenance of museums and heritage sites prevents them from realising their full potential.

In this regard, Adopt-a-Heritage Project is a key initiative of the Ministry of Tourism (in close collaboration with the Ministry of Culture and ASI) to develop the heritage sites/monuments and making them tourist-friendly. Under the *Apni Dharohar-Apni Pehchan*', ASI enter into agreements with private bodies for developing/maintaining visitors' facilities at CPM. These bodies termed as *Monument Mitra*' are responsible for operation, maintenance and up-gradation of tourist amenities, in the non-core areas of the monument.

Bye-laws being framed by the Ministry should also explore and provide adequate scope for the involvement of private bodies through PPP mode for non-core activities.

5.2 Financial Management in ASI

The ASI operates through its Circles and other field offices, spread all over the country, having delegated financial powers for conservation related works. Apart from incurring expenditure, these field units were also receiving cash on account of sale of tickets, permissions of photography/event, publication, etc. In this regard, following concerns indicate weak expenditure management in ASI:

➢ Information on reconciliation of expenditure figures from 2015-16 to 2018-19 was not available with the ASI Headquarters despite the issue being consistently pursued by it.

➢ There were instances at field offices of ASI, where the sanctioning authority had also performed the functions of Drawing and Disbursing Authority. Further, the internal audit of ASI had not been conducted by the Ministry after 2007.

➢ Audit noted instances of incorrect details of expenditure on the preservation and conservation activities[25] which suggested ASI's incorrect accounting with reference to expenditure on conservation activities.

Ministry/ASI stated (January 2022) that earlier reconciliation of expenditure was carried out by respective Circles with Pay and Accounts Office. However, from the financial year 2020-21 onwards this exercise was being monitored by ASI Headquarters also.

5.2.1 Financial irregularities in ASI

In order to focus its efforts more on core conservation activities, ASI had awarded certain non-core works *viz.* (i) construction of boundary walls, toilet blocks and (ii) development of other public amenities at *Adarsh* monuments to four Public Sector Undertakings[26] (PSUs) in September 2016 and March 2018, respectively. As per instructions issued by the Ministry of Finance[27], for projects/scheme costing more than ₹500 crore, appraisal by the Expenditure Finance Committee (EFC) and approval of the Finance Minister was needed. However, though the costs of both these projects were over ₹500 crore each[28], the approval of these two projects had not gone through the due financial appraisal *i.e.* by the EFC and approval of the

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[25] Delhi Circle reported (January 2020 and January 2021) two different expenditure figures for conservation activity undertaken during 2016-19 in the same monument. Further, expenditure on account of electricity and water supply charges and office up-gradation were booked against the conservation activities. Similarly, in Mumbai Circle, administrative expenses incurred on Aga Khan Palace was treated as annual repair expenditure.

[26] WAPCOS, TCIL, NPCC and NBCC

[27] O.M.No.24(35)/PF-II/2012 dated 5.8.2016 and No.1(5)/2016-E.II(A) dated 27.5.2016

[28] For construction of boundary walls & toilet blocks: ₹ 629.57 crore and for development of public amenities: ₹ 713.67 crore

Finance Minister. After splitting the cost, work was awarded on nomination basis with the approval of the Ministry of Culture. In three Circles of Karnataka (Bengaluru, Dharwad and Hampi), delay in works awarded to WAPCOS (160 works at a total cost of ₹188.79 crore) was noticed. A test check of works done by WAPCOS also revealed:

➢ Wood work done at Bidar Fort in Dharwad Circle was already eaten by termites while the toilet seat installed for differently abled came off without even being used.

➢ Boundary wall constructed at Tipu Sultan Palace, Bengaluru requiring stone masonry (as per estimate) to match with the monument had been constructed in brick masonry with cement plastering.

In Bhubaneswar Circle, construction work of Boundary Wall, Toilet Block and access to the differently abled at Chunargarh monument, with an estimated cost of ₹ 16.48 crore, was sub-contracted by TCIL (April 2018). It was noticed that for want of site demarcation and forest clearance, a site free from encumbrance was not available. As a result, the work was stopped (October 2020) by the Forest Department. In this regard, the Circle office intimated that the issue was under consideration with the respective Department.

Ministry/ASI stated (January 2022) that the MoU for the work was signed with the approval of the Ministry after due vetting by Ministry of Law. However, no explanation on issues *viz.* appraisal by the competent forum; approval of the competent authority and quality of work being carried out was furnished.

Other observations on financial management such as irregularities in awarding housekeeping contracts for the monuments, non-recovery of labour cess, delay in deposit of receipts from ticket sale, unutilised construction material, etc. are illustrated at **Annexe 5.1**.

5.3   Revenue Generation in ASI

NITI Aayog, in its Voluntary National Report presented to United Nations High Level Political Forum (June 2020)[29], had mentioned that tourism accounted for 6.8 *per cent* of India's GDP in 2019 and contribute to 8.1 *per cent* of all employment. It expected that over the next decade, the sector's direct contribution to GDP would grow by 7.1 *per cent* per annum.

Receipts through sale of tickets and permissions for film shooting, organisation of cultural events, etc. are the main sources of revenue for the ASI[30]. *The PAC had asked the Ministry/ASI to explore other possible avenues of revenue generation, consider revising the entry ticket and other charges and also bring more monuments under the ticketed category.*

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[29] To report the efforts and progress made towards achieving the Sustainable Development Goals.
[30] Treated as 'other receipts' of the Government under the head 0202-04- 800.

Since the earlier Performance Audit, ASI had revised the entry fee rates (2016 and 2018) upwards as detailed in **Annexe 5.2.** Number of ticketed monuments had also been increased from 116 to 143 (in April 2019 and February 2020). Besides revised charges for film shooting, extension of visiting hours to monuments and discount on digital payments had also been introduced by ASI.

Other issues connected with receipts of ASI are discussed in succeeding paragraphs:

5.3.1   Revenue through Ticketing

In the previous Report, absence of specific criteria or guidelines for categorisation of a specific monument as ticketed monument was mentioned. Ministry had informed the PAC that *footfall of the visitors at the monument is generally taken into consideration while identifying new monuments to be brought under category of ticketed monuments*. However, it also submitted that no record was being maintained at any monument in respect of monitoring footfall. As mentioned in Para 3.1, amendment in AMASR Act for introducing a system of recording footfalls was still pending. Audit further noted:

➢ Out of 3693 monuments in 33 States/UTs, ASI had 143 ticketed monuments in 20 States/UTs, while in remaining13 States/UTs[31], having a total of 150 monuments, none was considered by ASI for ticketing. It was noted that there was absence of transparency/criteria for notifying a certain monument as ticketed. This could also be seen from the fact that monuments in Bhopal (Buddhist Caves), Delhi (*Sultan Garhi*) and Vadodara (*Baba Pyara* Caves) Circles with zero or negligible footfall were continuously included in the list of ticketed monuments. In contrast, the request of Chandigarh Circle (May 2019) regarding introduction of entry ticket in *Jal Mahal*, Narnaul, Haryana was not considered by ASI.

➢ In Bhubaneswar Circle, after revision of entry fee (from 1 April 2016), between 6 April 2016 to 22 May 2016, instead of revised ticket rates of ₹ 30, only ₹ 10 was charged from the visitors of Sun Temple, Konark. Circle office intimated that pre-revised rate was charged as per the order of the Collector, Puri, Odisha. The violation not waived by the Ministry resulted in short collection of entry fee of ₹ 44.02 lakh.

➢ ASI had not issued any notification identifying its ticketed site-museums or fixing rate of their entry fees[32]. In Delhi Circle, ₹ 30 and ₹ 350 were being charged (cashless payment) from Indian and foreign visitors, respectively, for four site-museums located at Red Fort. However, for one site-museum at *Purana Qila* ₹ five was being charged only from Indian visitors. ASI was also found charging entry fees from visitors to enter into lake area of *Purana Qila* without issuing notification for this purpose.

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[31] Arunachal Pradesh, Daman & Diu, Jharkhand, Ladakh, Manipur, Meghalaya, Mizoram, Nagaland, Puducherry, Punjab, Sikkim, Tripura and Uttarakhand.
[32] Entry fee being charged for 30 site-museums

➢ Similarly, out of five site-museums located in Madhya Pradesh, entry fee for Shivpuri site-museum was not being charged by ASI. There was no proposal from the Circle office despite considerable number of visitors arriving at the museum.

➢ With reference to receipts from ticketing, variation in the amount of receipts and number of visitors as intimated by ASI Headquarters and Delhi Circle was observed. Audit had also pointed out earlier (January 2019) about variation in the receipts of ASI and those reported to Pay and Accounts office. These instances indicate weak receipts management in ASI.

➢ The Ministry/ASI had intimated the PAC regarding its decision about opening of souvenir shops at selected monuments at *Qutub Minar* and Sarnath[33]. During physical inspection, no such shop was found open at *Qutub Minar,* Delhi. ASI informed (January 2021) that it was in process to formulate a mechanism for the purpose.

ASI stated (January 2022) that it had a mechanism wherein the concerned Conservation Assistant and Watch & Ward staff regularly informs about the number of visitors to a monument. Further based on data for a fairly long period (six months to a year), concerned Circle recommend for inclusion of the monument as a ticketed monument.

Reply was not tenable as some of the monuments referred above have been considered by ASI as ticketed despite low visitors' footfall for a long period. Further, as pointed out in Paragraphs 4.2 and 7.3, many ASI monuments had no watch & ward staff or being looked after by only a single Conservation Assistant.

> **Monuments with Restricted Access:** As per AMASR Act 1958 and Rules made thereunder, the public shall have a right of access to all protected monuments and ASI may prescribe entrance fee on certain specified monuments by notifying them as ticketed.
>
> In respect of non-ticketed monuments, issue of restricted public access was discussed in the previous Report. Audit pointed out that at some CPM, there were restrictions for people of some category Further, some monuments were in the premises of other agencies and were not open for all visitors[34]. Since ASI had not entered into any agreement/MoU with the management of these monuments, Ministry had assured the PAC that ASI would pursue the matter of individual written agreement with owners of these monuments, wherever feasible. However, during audit, ASI was unable to provide any assurance that efforts had been made towards resolving issues of restricted access in non-ticketed monuments. Ministry/ASI intimated (January 2022) that at some of the religious places, such restrictions were in practice for long and were not interfered with, in view of the

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[33] The Ministry had intimated about signing of MoU with Handicraft and Exports Cooperation (Ministry of Textiles) to open souvenir shops at *Qutub Minar* and Sarnath.
[34] Seven monuments located in the premises of other Agencies (five in Delhi Circle and two in Patna Circle). 11 monuments where entry to visitors were restricted based on their religion/gender.
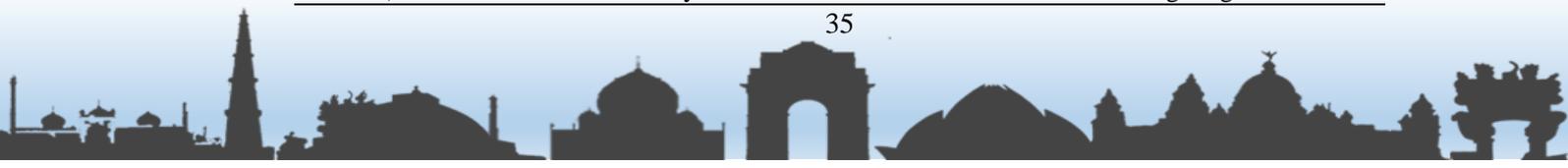
> law and order situation.
>
> Moreover, in Delhi Circle, restricted access to six more non-ticketed monuments of ASI was noticed. All these monuments were located inside a garden *viz.* Sunder Nursery which was managed privately and entry fee (upto ₹ 200) was being charged by its management for the garden entry (including monuments). ASI in a reply (August 2021) submitted that it had entered into MoU with the management of Sunder Nursery (December 2017) to carry out conservation activities at its monuments and charge entry fee from the visitors to the garden (including monuments). Fact remains that, these six monuments were not declared by ASI as ticketed and it had no mechanism to ensure free access to general public visiting these monuments.

5.3.2   Sound and Light Shows

ASI had entered into agreement (MoU) with different stakeholders' *viz.* India Tourism Development Corporation, State Tourism Departments for sound and light shows at selected monuments. It was noted that in agreements entered by ASI, there was no uniformity on the revenue sharing pattern. In respect of Sanchi-Group of Monuments and *Hindola Mahal*, Mandu, (both in Madhya Pradesh) amount equivalent to entry fee ticket was agreed by ASI as its share of revenue, while in Sarnath and Residency, Lucknow (both in Uttar Pradesh), ASI agreed to a share of 40 *per cent* of the income generated from the show. Bhubaneswar Circle had sound and light shows at two monuments *i.e.* Sun Temple, Konark and Khandagiri, Udayagiri caves. However, audit noticed that the facility at Khandagiri, Udayagiri caves was not functional. In this regard, Circle office stated that the sound and light shows facility would be operative soon.

Ministry/ASI stated (January 2022) that normally revenue sharing in Sound and Light show is 60:40 but sometimes agencies involved in the process request for lower sharing amount (to ASI) due to higher cost of show running. It further informed that guidelines for Sound and Light show were being worked out.

5.3.3   Receipts from Publications and Horticultural activities

PAC had noted that receipts from sales of publications and horticultural activities were another source of revenue of the ASI. The Horticulture Branch had reported receipts of ₹ 1.08 crore from the sale of grass, dead wood and fruit auction during the period 2013-14 to 2019-20. However, during the same period, its Division located at Bhubaneswar, Odisha had shown no income from the sale of grass from any of the 157 number of gardens under its control. In respect of Publication Division, there was no unified system for compiling sales of publication or stocking of over 460 types of books at their designated 107 sales counters.
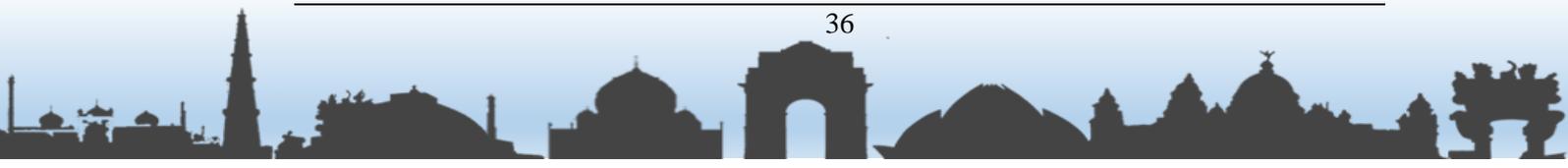
Ministry/ASI stated (January 2022) that a decision had been taken to create a unified application to control and access the data of sales and stock of publications.

Conclusions:

In view of recommendations of PAC, ASI had included more monuments under the ticketed category and also revised upward the rates of entry tickets and charges for film shooting at the monuments. It had introduced e-ticketing facility for online booking of entry ticket for monuments. Further, as part of other funding arrangements, for developing amenities at monuments, private bodies have been involved under 'Adopt-a-Heritage Initiative'. However, some areas of concern in financial management were found to persist.

➢ *Despite assuring the PAC, ASI's expenditure on excavation and exploration activities was still below one per cent.*

➢ *Funds available with National Culture Fund have been accumulating over the years and not being utilised for its objectives.*

➢ *There was lack of clear guidelines regarding categorization of a monument as ticketed/non-ticketed, amount of fees to be levied/shared, issue of notification, etc.*

Functional Issues

Laxman Temple Khajuraho
(Madhya Pradesh)

Chapter 6: Identification and Notification of Monuments and Antiquities

India's rich repository of heritage includes an estimated 4 lakh plus heritage structures and 58 lakh plus antiquities[35], mostly under the control of Central and State level authorities, museums, religious bodies, etc. The identification and documentation process of these monuments/antiquities and issues related with their notification have been discussed in this chapter.

6.1   National Database of all Monuments and Antiquities

With the objective to prepare a national database of all monuments and antiquities, National Mission on Monuments and Antiquities (NMMA) was launched by the Government[36] (2007), initially for a period of five years *i.e.* 2007-2012. In order to complete the documentation process and continue the momentum, this period was extended by another five years (2012-2017) and later NMMA was merged with ASI (October 2017). Delay in setting-up of NMMA and lack of planning leading to failure in achieving its objective was pointed out in the previous Report.

The PAC had asked the Ministry that a national register highlighting the details of each and every ancient monument, sites and remains both of National and State importance, including artefacts lying in museums, government treasuries and/or in other government and private possession spread over the country, may be prepared. The progress and current status of documentation and database work initiated by NMMA in 2007 is depicted in **Table 6.1**:

Table 6.1: Progress in Documenting Monuments and Antiquities

Period	Documentation		Uploading of Data	
	Monuments	**Antiquities**	**Monuments**	**Antiquities**
2007-12	34794	48411	0	0
2012-17	1.84 lakh	15.0 lakh	9688	2.40 lakh
2017-19*	3228	1.70 lakh	312	10.13 lakh
2019-20	6039	32537	859	8952
2020-21	3186	2400	703	1569
Total	**2.31 lakh**	**17.53 lakh**	**11562**	**12.64 lakh**

*Period counted upto/from October

Note: For 2019-20 and 2020-21, status reported by NMMA (in October 2020 and December 2021) was upto October 2020 and from November 2020 to 1 December 2021.

It would be seen from the **Table 6.1** that since 2017, the process for documentation of monuments and antiquities had considerably slowed down. NMMA, in its reply

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[35] Source: ASI
[36] Creation of NMMA was announced by then Prime Minister in August 2003.

(October 2020), attributed logistical insufficiency, ineffective monitoring and budgetary constraints as the reasons for defaults in achieving the targets. It also stated that there was a need for reviewing the existing documentation process/guidelines, identify and revive Documentation Resource Centres (DRC)/State Level Implementing Committees (SLIC), initiate training programmes and workshops at the local levels. Audit, however, noted additional reasons to conclude that the whole project was poorly implemented:

➢ There was no defined strategy or road-map for documenting the estimated 4 lakh monuments and 58 lakh antiquities. No annual target or annual progress in documentation work was available with NMMA. After giving two consecutive extensions of five years each, NMMA was merged with ASI without any time-frame for completion of the work.

➢ The project was undertaken without ascertaining the availability of technical capability. NMMA intimated absence of any commercial agency in the country to carry out the research oriented documentation work. The staff strength available in ASI was also inadequate to complete the work.

➢ Since March 2015, no workshop was held to facilitate documentation work, rectify mistakes or to provide clarification to agencies involved in the process. As a result, there was absence of a system for regularly up-grading the technical capability of executing agencies, which affected the work process.

➢ The DRCs identified to carry out the work were insufficient and became dormant over the years. The SLICs constituted for the identification of DRCs and evaluation of their work were also not functional. As a result, there was absence of an effective mechanism to control the work output and fund utilisation by DRCs[37]. Further, meetings of National Mission Monitoring Committee to periodically review the wok of NMMA were not held after August 2016.

➢ In respect of 1.80 lakh monuments, the documentation work carried out was based on secondary sources and not verified through primary survey. After scrutinizing the work and deleting certain data, NMMA reported (December 2021) following reduced progress status:

Period	Documentation		Uploading of Data	
	Monuments	**Antiquities**	**Monuments**	**Antiquities**
Revised Progress	1.84 lakh	16.83 lakh	11406	12.60 lakh

Ministry/ASI stated (January 2022) that a large number of antiquities and sites were

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[37] Against the assigned documentation of 23,526 monuments and 8.45 lakh antiquities, DRCs had completed documentation of only 5,444 monuments and 2.98 lakh antiquities. Utilisation certificates of ₹ 86.2 lakh have also been reported outstanding (October 2020).
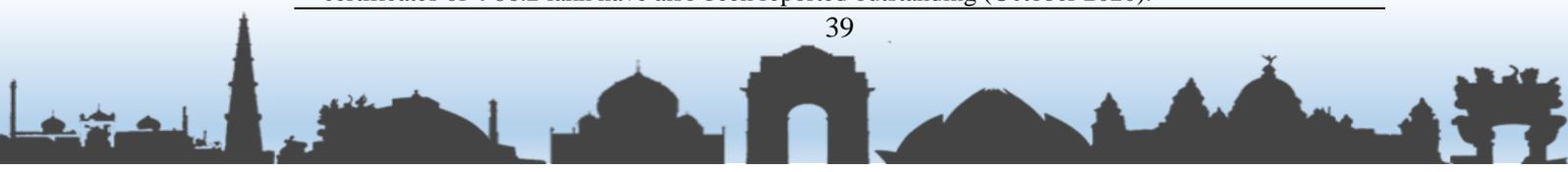
under the custody of States, Private organisations, Trusts and individuals and unless these agencies consider for collaboration with NMMA, no target can be achieved. It also informed about two initiatives (i) initiation of concept of engaging Young Archaeologist for carrying out primary survey and documentation of antiquities, and (ii) rolling advertisement for engagement of DRCs for the work.

A successful completion of the NMMA project would have provided an authentic inventory of most of the monuments, sites and antiquities in the country. The achievement would have been helpful in greater synergy amongst the agencies involved in preservation of monuments and prevention of illegal trade of antiquities. However, due to the reasons mentioned above, even after 14 years of establishment of NMMA, documentation work of only 46 *per cent* monuments and 29 *per cent* of antiquities have been completed.

6.2   Database of Monuments and Antiquities with ASI

Out of the estimated four lakh plus heritage structures in the country, 3693 monuments and archaeological sites are under the jurisdiction of ASI (December 2021). *The PAC had recommended preparation of inventory of all CPM within a period of two years, which was to be updated every five years. This inventory, displaying various information e.g. geographic location, category, distance from nearest city/town, historical and cultural significance, encroachment details, etc., was to be made accessible to public through a portal.*

It was, however, noted that a centralised database/inventory of all CPM displaying all the recommended information to the public was still not available (March 2022). It was further noted that information on CPM, displayed online through websites of respective Circles, was also not uniform[38]. While some Circles were displaying the history, notification, location of concerned monuments (*e.g.* Dehradun, Bengaluru), others were only providing list of respective monuments (*e.g.* Agra, Bhopal). In Chandigarh and Bengaluru Circles, important information *i.e.* notification detail in respect of three[39] and two[40] monuments respectively were not available. Similarly, in Bhubaneswar Circle, out of 80 monuments/sites, Gazette Notification for only 38 was available. Also, in Bhubaneswar Circle, against the notified four Colossal *Matrikas* (sculptures), only three were shown in the inventory. Monuments where final notification was not issued are also listed at **Annexe-6.2(b)**.

ASI intimated (December 2020) that the data with respect to Gazette Notification for 3150 CPM had been compiled. Ministry/ASI stated (January 2022) that all Gazette Notifications will be part of Indian Heritage Mobile Application under development.

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[38] Also refer Para 4.1, in some of the Circles, websites were not functional.
[39] *Baoli Ghaus Ali Shah*-Gurugram, Shah Ibrahim Tomb-Narnaul, Shah Quli Khan's Tomb-Narnaul.
[40] Channakesava Temple, Hassan, Someswara Temple, Shimoga

However, the fact remains that the inventory is yet to be completed.

In respect of antiquities, though ASI had estimated 58 lakh plus antiquities at all India level, they had no database or inventory of antiquities in their possession.

6.2.1   Categorisation of the Monuments

According to AMASR (Amendment and Validation) Act, 2010, the Central Government, on the recommendation of the NMA, was to classify all the monuments and archaeological sites under the jurisdiction of ASI in accordance with the prescribed eight categories[41]. This categorisation was to be done on the basis of information provided to NMA by ASI which was to be exhibited on government website for general public. In this regard, Ministry had intimated the PAC that categorisation of monuments was completed and handed over to NMA for their consideration and making recommendations to the Ministry. However, NMA intimated (November 2020) that a list of only 915 monuments (out of 3693 CPM) had so far been prepared, which was still under consideration due to non-finalisation of monuments under Category III.

Despite being pointed out in the previous Report and the PAC's Report, insufficient efforts were made by ASI regarding categorisation of all the CPM.

6.3   Monuments of National Importance under ASI

According to AMASR Act, 1958 ancient and historical monuments, archaeological sites and remains declared under the AHMASR Act, 1951[42], are considered of national importance. AMASR Act also specifies that in case the Central Government is of the opinion that any ancient and historical monument or archaeological site and remains had ceased to be of national importance, it may declare so by notification. In the previous Report, several issues connected with identification and declaration of a monument of national importance were reported. In this regard, PAC had also made several recommendations. These issues, examined during the follow-up audit, are discussed below:

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[41] Vide Rule 6 of NMA Rules, 2011 framed under AMASR (Amendment and Validation) Act.

Category I	World Heritage Sites
Category II	Tentative list of World Heritage Sites
Category III	Identified for inclusion in the World Heritage tentative list
Category IV	Ticketed monuments (other than mentioned above)
Category V	Identified for categorisation as ticketed monuments
Category VI	Living monuments which receive large number of visitors
Category VII	Other monuments located in the Urban/semi-urban limits and in the remote villages
Category VIII	Other category as the Authority may deem fit

[42] or declared under Section 126 of the State Re-organisations Act, 1956.
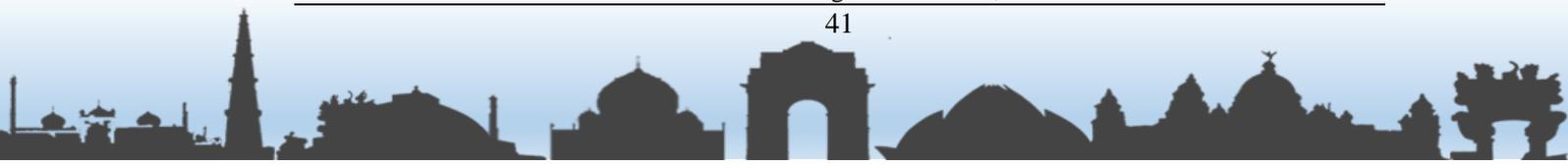
6.3.1   Criteria for defining monument of national importance

In the previous Report, Audit had pointed out several instances indicating absence of defined set of criteria for declaring a monument to be of national importance. *In this regard, the PAC had recommended that guidelines for determination of monuments of national importance be finalised at the earliest.* It was noted that these guidelines have still not been framed. As a result, in below mentioned categories, ASI had adopted different criteria for defining monuments of national importance:

a)   Single complex, where more than one monument or independent structure was notified as a separate monument while in other instances all structures within a complex were notified as single monument;

b)   Instances where only a portion of the whole structure was notified as monuments of national importance while its other part of the structure was left unprotected

c)   Cases where *Kos-Minars* were also protected by State Archaeology Department

These cases are illustrated at **Annexe 6.1.** Ministry/ASI stated (January 2022) that it was working on guidelines as recommended by PAC.

6.3.2   Survey to identify monuments of national importance

The PAC had noted that a comprehensive survey to identify monuments of national importance for placing them in the centrally protected category was overdue. The Ministry in its ATN (April 2016) had also agreed that there was an urgent need to review and survey all the ancient monuments/sites declared as being of national importance and find out whether they still continue to be of national importance. The PAC had recommended that after the finalization of the guidelines (as mentioned in previous para), a comprehensive survey should be conducted to identify the exact number of monuments of national importance that can be protected.

During the period 2013 to 2021 (*i.e.* between earlier Performance Audit and current follow-up audit), no comprehensive survey/review to identify monuments of national importance that can be protected was undertaken by ASI[43].   In this regard, Chandigarh Circle also reported that no such guideline was received by it from ASI Headquarters[44].   Further, there was no effort by ASI to identify those monuments which over the period had lost their significance and need to be shifted to the States. The initiative was not even undertaken on a smaller scale as a pilot project in the selected States (December 2021).

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[43] According to the submission made by the Ministry with PAC, earlier survey undertaken by ASI was in 1998-99.

[44] Chandigarh Circle, however, conducted three surveys at Bara Talao and Solah Rahi Talao, Rewari (June 2015), Archeology mound, Mitathai, Bhiwani (September 2020) and Archaeological mounds 6 & 7 at Rakhigarhi, Hisar (November 2020). None of the monument was included in the list of CPM.

ASI informed (January 2022) that taking of survey or exploration to identify and document ancient remains, site or structure is an ongoing phenomenon. As such, the view of PAC was not relevant and not possible to be implemented. Further, in consultation with the Ministry, it was working on modalities to be adopted for monuments which had lost their significance.

The reply of the Ministry/ASI (January 2022) was contrary to their earlier response (April 2016) to the PAC recommendations.

Structural remains of Tomar dynasty-King Anangpal II, founders of Delhi

In the eleventh century A.D., rulers of Tomar dynasty shifted their royal seat from Anangpur (Faridabad, Haryana) to *Lal Kot* (Delhi) and founded a new city called *Dhill* or *Dhillikapuri* in the vicinity of the erstwhile temple township of Yoginipura (near Qutub Archaeological Area). With the re-establishment of the nail of earth (*killi-dhill*– Mehrauli Iron Pillar brought from Mathura in Samvat 1109/1051CE), King Anangpal-II[45] was considered as founder of Delhi.

Remains of the walls of *Lal Kot* built by King Anangpal-II have been notified by ASI as protected monument. *Anang Tal* is another structure (reservoir) in the Qutub Archaeological Area, believed to be constructed by King Anangpal-II. ASI had undertaken excavation at *Anang Tal* (1991-95) but the structure was not protected by ASI or Delhi State Archaeology Department.

A visit to *Anang Tal* revealed that sewage from nearby areas was being discharged into the reservoir and remains of the monument were in a neglected state as depicted in following photographs:

The PAC had recommended that ASI/Ministry may consider issuing guidelines whereby Ancient monuments (predating say 1700 AD) and contemporary monuments that are 100 years old and of national importance stand automatically protected. However, no such guidelines declaring 100 years old monuments as of national importance was found in existence. As a result, *Anang Tal,* a heritage structures not protected by any agency was in its last stage of disappearance. Ministry/ASI intimated (January 2022) that a proposal for protection of the structure was under consideration.

Historical source: National Seminar document prepared by NMA, Ministry of Culture in February 2021

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[45] Also mentioned as Anang Pal, Anangapala in sourced document.

6.3.3 Process of Identifying Monuments of National Importance

The procedure followed for notifying certain monument as being of national importance included receipt of proposal from the Circle office, its scrutiny by a Committee at ASI Headquarters and thereafter approval of the Minister for issue of relevant preliminary notification in the official gazette. ASI, based on specific requests/inputs received from respective Circles, had revised the list of CPM from 3,678 to 3,693 during the period 2013-2021.

ASI, however, had no defined procedure/schedule for reviewing/modifying the list of CPM. Audit noted:

➢ In respect of notification of one new monument (in 2018) and de-notification of two monuments[46] (in 1931 and 1999), updation in the list of CPM was carried out in October 2020 with significant delay.

➢ In Delhi Circle, Tomb of Ghaziuddin Khan, Ajmeri Gate (notified in 1925) was not included in the list of CPM (till October 2020). It was noted that another monument Tomb of Ghiasuddin Khan, Tughlakabad was included in the list twice and the correction was made in October 2020 by inserting Ghaziuddin Khan and removing Ghiasuddin Khan. Ministry/ASI accepted (January 2022) that this was due to correction of typographical mistake in the list of monuments.

➢ Bhopal Circle had submitted (July 2014) a proposal with ASI Headquarters for de-notification of the monument i.e., Jain Temples on the Hills, Kundalpur, Damoh, Madhya Pradesh. Though the proposal was in accordance with the judgement of Apex Court (2014) declaring the monument as State protected monument, Ministry/ASI stated (January 2022) that in view of Section 3 of AMASR Act, 1958[47] there was no need to de-notify the monument. Audit noted that despite the decision of the Apex Court, this monument continues to be included in the list of 3693 CPM.

➢ Proposal sent (June 2001) by Dharwad Circle regarding inclusion of excavated site, Benagutti as monument of national importance was still pending with ASI Headquarters. In this regard, no follow-up was attempted by the Circle office to get the approval.

➢ De-notification of monuments proposed by Mumbai Circle in September 2007 and in November 2013 had still not been carried out by the ASI.

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[46] Three structures at internal building of Siri Fort (1931) and Site of siege battery with inscription (1999) both in Delhi Circle.

[47] All monuments, sites and remains which have been declared by AHMASR Act, 1951 to be of national importance shall be deemed to be of national importance and need not be notified/de-notified again.

6.3.4 Discrepancy in the list of Centrally Protected Monuments

In the previous Report, discrepancies were pointed out in the list of CPM due to following reasons:

a) same monuments were notified twice;

b) monuments were declared protected without any notification;

c) monuments were protected both by Centre and State; and

d) the antiquities were declared as monument

Despite assurance by the Ministry for rectification of these reported discrepancies, the errors still existed in the list of CPM as detailed in **Annexe 6.2**. Ministry/ASI replied (January 2022) that the observation of PAC had been noted and corrective measures shall be taken to resolve the issues pointed out by Audit.

6.3.5 De-notification of Missing Monuments

In the previous Report, Audit had reported 92 CPM as missing. The Ministry/ASI intimated (August 2017/ March 2021) that out of 92 missing monuments, 42 had been traced, 14 had been affected due to rapid urbanisation, 12 had submerged under reservoir/dam and 24 were not traceable.

During joint physical inspection it was observed that two monuments in Delhi Circle[48] identified by ASI as physically existing/traced and four monuments in Bengaluru (3) and Jabalpur (1) Circles[49] reported as affected due to urbanisation/submerged under water were also not in existence. Similarly, in Kolkata Circle, six monuments reportedly submerged during construction of dam continue to be included in the list of CPM, despite proposal for their de-notification having been made in July 2017. Audit further noted that 24 monuments accepted by ASI, as not traceable, had not been de-notified and they continue to be included in the list of CPM. Details of monuments which need to be de-notified due to their non-existence are given in **Annexe 6.3**. Ministry/ASI stated (January 2022) that it was working on modalities for de-notification of untraceable monuments. It further stated that the process requires strict scrutiny and takes longer time.

Antiquities missing from submerged Monuments

Out of six monuments declared submerged, statues pertaining to three monuments were reported by the Kolkata Circle as not traceable. However, during joint physical inspection, three statues similar to the images available in the inventory with the Circle office were found lying unattended and unprotected near the dam

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[48] Nicholson Statue (reported existing), Tomb of Capt. Mc Barnett & others (reported affected). In the previous Report, it was mentioned that Nicholson Statue was gifted away (in 1960) by the Government of India to Government of Ireland.
[49] Pre-historic sites at Kittur, Hejjala and Chikkajala (all in Bengaluru), Fresco painting, Rewa (Jabalpur)
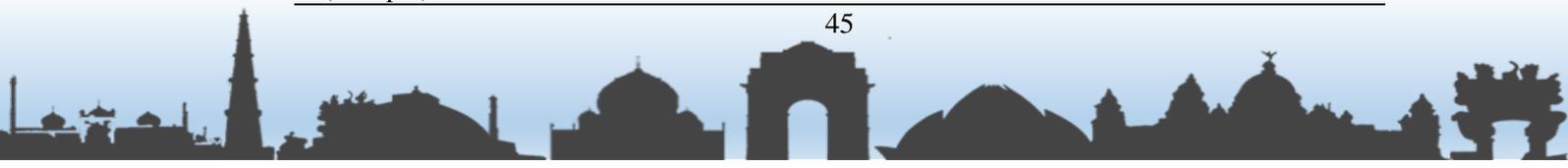
> site. The Circle office was unable to confirm these unattended statues as the same artefacts notified along with the monuments (later submerged). It assured checking of its archive for confirmation. The action highlights the importance of preparation of database as the Circle office/ASI was unaware of its heritage collection.

An effective laid down procedure for identification of all monuments of national importance and its adherence is essential for better planning and prudent use of available resources for heritage conservation. However, inadequate efforts on the part of the Ministry/ASI to rectify discrepancies in the list of monuments indicates the lack of a comprehensive strategy for management of national heritage.

6.3.6 Hasty notification of Monuments

In the previous Report, Audit had pointed out that ASI had notified monuments[50] in Kolkata Circle without resolving the issues regarding encroachment/unauthorised occupancy. In this respect, the Ministry had stated (May 2013) that such actions were taken on the assurance given by the occupants and the State Governments. During follow-up audit, it was noted that the litigation regarding illegal occupants at one monument (Tamluk, Rajbati) was dismissed (2014) by the High Court in favour of ASI. However, both the monuments were still being illegally occupied by encroachers. Due to illegal occupants and hasty notifications, ASI was not able to carry out any preservation and conservation activities at these monuments resulting in their being in a dilapidated condition (refer pictures at Annexe 7.2, Para 4.2)[51].

6.4 Antiquities

➢ The AAT Act empowers the Government to compulsorily acquire antiquities. Apart from compulsory acquisition, ASI collects antiquities through exploration, excavation, survey, purchase, gifts, etc. ASI is one of the largest repositories of antiquities in India. However, as mentioned in Para 3.1, no comprehensive policy document for management of antiquities had been prepared and the exercise undertaken for review of AAT Act was still in process. In a press release (July 2021), the Ministry had informed that digitisation of the collection of 2.8 lakh artefacts of ten government museums and galleries (including national level museums, site-museums and modern art galleries) have been completed under *JATAN* software programme (*refer Para 1.3*).

➢ As mentioned in previous Report, ASI had no policy/standard for transfer/ shifting/acquisition/custody of antiquities. It intimated (December 2020) that

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[50] (i) Tamluk, Rajbati (ii) Clive House, Dum Dum and (iii) *Moti Jheel* Masjid
[51] ASI had decided to shift its Tamluk site-museum from rented building to the monument. However, due to its illegal occupants and absence of restoration process, it had to purchase (2019) another land for ₹ 76.77 lakh for construction of the site-museum.
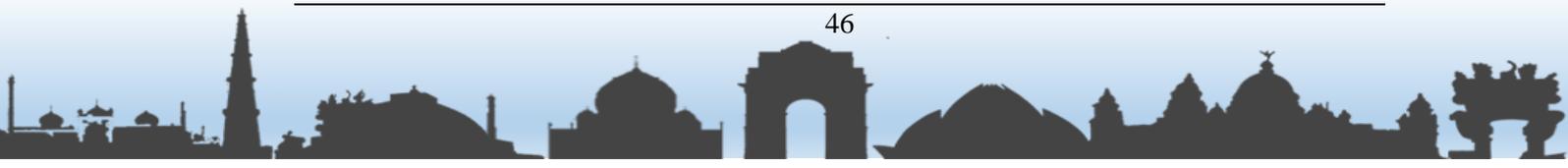
at the time of transfer of antiquities, neither any agreement with the associated firm nor any insurance is being done.

➢ *The PAC had recommended the Ministry to explore and take necessary steps to recover or procure antiquities which are of cultural significance to our country but have been sold to buyers abroad and also to bring back the artefacts/antiquities and/or Cultural Property of Indian origin that were taken outside the country.* Ministry/ASI stated (January 2022) that retrieval of antiquities is one of its focus area. The process for retrieval was accelerated since 2014 and 199 antiquities have been retrieved till date whereas it retrieved only 13 antiquities during the period between 1976 and 2013.

Conclusions:

➢ *After 2014, Ministry/ASI had made significant improvement in retrieving artefacts of Indian origin that were taken outside the country. However, work regarding preparation of centralised and digitised database of monuments and antiquities was lagging even after 14 years of establishment of National Mission on Monuments and Antiquities.*

➢ *Despite PAC recommendations and pointing out in previous Report, issues related with monuments of national importance viz. criteria and process for their selection, preparation of inventory of all protected monuments for public display, categorization of monuments, rectification of discrepancies in the list of monuments, their notification and de-notification, etc., have not been resolved.*

Chapter 7: Monuments Management

Monuments and archaeological sites are finite and our non-renewable cultural resource. India's rich repository of heritage include world heritage sites and monuments declared as of national importance. The conservation work of these centrally protected monuments/sites is a continuous process and the prime responsibility of ASI.

7.1 Management of Centrally Protected Monuments

Audit examined issues related with management of World Heritage Sites, *Adarsh Smarak,* Ticketed monuments, Living Monuments, etc. In this regard, joint physical inspection of 184 selected monuments was carried out to assess availability of public amenities and other service related issues. Results of these assessments are discussed in succeeding paragraphs.

7.1.1 World Heritage Sites

The UNESCO designates a specific monument as a World Heritage Site (WHS). The citation is prestigious for any country and gives a boost to its tourism. India has 40 WHS (32 cultural, seven natural and one mixed) of which 24 were under the jurisdiction of ASI (June 2021).

In the previous Report, after joint physical inspection, it was reported that WHS faced many issues related to security, public amenities, encroachment, etc. A similar exercise conducted during the follow-up audit revealed that in 12 WHS, some public facilities were still not available. As detailed at **Annexe 7.1**, apart from public facilities, interpreter/guide or audio guide services were also not available.

In response to recommendation made by the Standing Committee of Parliament (March 2021) regarding development of a mobile application to provide informative content about the monuments and site-museums, ASI stated (December 2021) that the same was under development.

Though audit recommendation made in the previous Report for developing a separate mechanism to assess the fund, security and conservation requirements of WHS was accepted by the Ministry, no such procedure was found in existence.

World Heritage Site-Red Fort, Delhi

The concerns raised in the previous Report, with regard to Red Fort, Delhi were yet to be resolved by ASI, as given below:

➢ Parts of the monument *viz.* Mumtaz Mahal, Shah Burj have been closed for the general public without approval of the competent authority.

➢ Parts of the monument were still being used by CISF, private security agency for their office/residence.

➢ The Publication Division store of ASI was still functional from the monument in the colonial era building.

➢ Temple, Majar constructed inside the monument were still not included in the list of monuments reported for encroachment.

➢ There was still no system for security check of vehicles entering/leaving the premises of Red fort.

World Heritage Site-Sun Temple, Konark, Odisha

During the follow-up audit, a visit to Sun Temple, Konark revealed following:

➢ Some public amenities like toilet blocks, facilities for physically challenged, parking, cloak room facility and interpreter services were not available.

➢ There were unauthorised constructions and encroachments on the entrance of the monument which were later reported by ASI (January 2022) as having been removed.

➢ Fungal/vegetation growth and stains have occurred on the structure requiring chemical treatment. ASI reported (January 2022) that cleaning of the monument was a regular process and had been undertaken by its Science Branch.

➢ *Garbhagriha* of Sun Temple was closed for general public prior to its taking over by ASI in 1939.

➢ The CCTVs installed at the monument were not functional.

During the previous audit, in respect of WHS at Hampi and Pattadakal in Karnataka, various observations relating to incomplete conservation works, encroachments, absence of basic amenities for the visitors, etc. were made. Joint physical verification of these sites revealed that despite incurring expenditure on conservation, shortcomings at these monuments[52] remained unaddressed.

Ministry/ASI stated (January 2022) that some of WHS have also been considered as *Adarsh Smarak* and providing/ upgrading visitors facilities at these monuments is a regular phenomenon. It also informed that for some WHS it had entered into agreement under Adopt-a-Heritage scheme of Ministry of Tourism and a separate mechanism for fund, security and conservation requirements of WHS was being developed.

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[52] Krishna Temple Complex, Old Shiva Temple, Saraswathi Temple, Underground Shiva Temple, Octagonal Bath, Virupaksha Temple, Vitthala Temple Complex Ananthashayana Temple, Pattabhi Rama Temple, Raghunatha Temple, Lotus Mahal, Chandrasekhara Temple, Hazara Ram Temple (all in Hampi) and 10 monuments in Pattadakal.

7.1.2   *Adarsh Smarak* and Ticketed Monuments

The PAC had recommended that all monuments and sites maintained by ASI must have clean and modern toilets, eateries, medical shops and other conveniences in and around their precincts for the benefit of visitors.

The ASI had declared 100 monuments as *Adarsh Smarak* in March 2018 (including WHS, ticketed[53] and non-ticketed monuments) for providing amenities and facilities like toilets, clean drinking water, Wi-Fi services, cafeteria, facilities for physically challenged, signage, cloak rooms, interpretation centre, etc.[54]. Joint physical inspection of 36 *Adarsh Smarak* and other ticketed monuments revealed absence of various public amenities and facilities *viz.* drinking water, toilet blocks, parking, Wi-Fi, cloak rooms, facilities for physically challenged, guide services, etc. The Circle/State-wise details are given in **Annexe 7.1**.

Ministry/ASI stated (January 2022) that it has undertaken various initiatives to provide facilities such as approach pathway, signage, toilets, drinking water and first aid at *Adarsh Smarak* and were available in over 82 *per cent* such monuments undertaken. However, wheel chairs, toilets for *Divyang*, baby care rooms, vehicle parking were available in less than 56 *per cent* of such monuments.

> **Ticketed Monument-Sultan Garhi, Delhi**
>
> *Sultan Garhi*, Delhi had been notified by ASI as a ticketed monument. During a visit, it was noticed that the monument had no facilities for visitors *such as* drinking water, toilet, cultural signage, cloakroom, Wi-Fi and electricity. There was no pathway, vehicle parking or facilities for physically challenged. The monument area was being used for defecation. It had multiple entry/exit points, and with its boundary wall broken, the monument was not secure. The staff was unaware of the demarcation of the monument area. No horticulture activity was found to have been carried out at the monument. In a study conducted for NITI Aayog (2020), the monument was termed as the worst ticketed monument. Being a ticketed monument, ASI need to enhance the visitors' facilities at *Sultan Garhi.*

7.1.3   Other Monuments

The Ministry had intimated the PAC that there was no specific policy for preservation/conservation of different category/types of monuments. It informed that the protection work of monuments was taken up on the basis of studies carried out by field officers. Different types of monuments *viz.* living monuments, *Baolis*, Rock-Edicts discussed in the previous Report and relevant recommendations made by PAC were revisited during the follow-up audit. Findings in this regard are discussed below and also detailed at **Annexe 7.1**.

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[53] Out of 143 ticketing monuments, 54 have been included in the list of *Adarsh Smarak.*
[54] Scheme was launched in December 2014 with 25 monuments and 75 monuments were added in its second phase.
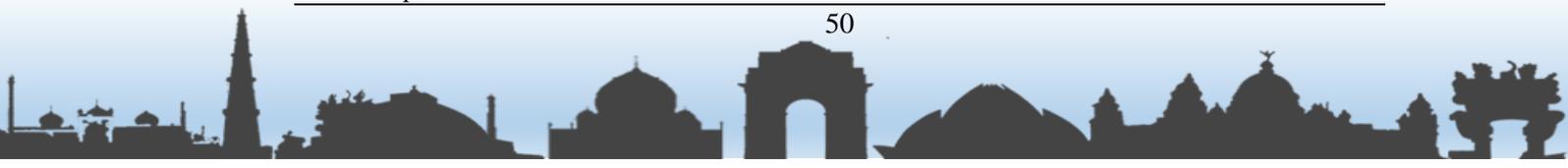
7.1.3.1 Living Monuments: According to John Marshall's Manual of Conservation, structures still in use for the purpose for which they were originally designed at the time of notification are living monuments. AMASR Act, 1958 also requires the Government to enter into an agreement with the owner of these living monuments for their maintenance and restriction on their destroying, removing, altering or defacing.

The PAC, while considering the need for protection and conservation of these living monuments, felt the requirement of:

> ➢ *evolving guidelines on the use of living monuments to ensure their safeguard and preservation;*

> ➢ *laid down policy for notification of sites with contested ownership or encroachments; and*

> ➢ *ensure signing of MoUs with users/occupants based on the said guidelines for retaining integrity of the monument.*

Despite recommendations of PAC, no guidelines or policy document on living monuments was prepared by ASI. ASI had identified 955 monuments being used for worship and prayers. However, as pointed out in the previous Report, ASI did not have the details of those monuments where prayers/worships were started before/after the issue of notification. Further, ASI/Ministry did not provide details of efforts made by it in signing MoU with the users/occupants of living monuments during the period 2013-20.

In Delhi Circle, all three monuments reported as living monuments[55] were found encroached upon. In Kolkata Circle, one living monument (St. John's Church) was controlled/maintained by the Church authorities and not handed over to ASI. Further, in Delhi, Aurangabad, Mumbai, Bengaluru, Dharwad and Kolkata Circles, significant changes in the structure of the monuments used for religious activities *viz.* construction of toilets, rooms, modern fittings, paints, etc. were found to have been made. A few of these changes made in the monuments are depicted below:

| Modern constructions made at Palam Mosque, Delhi | Ply boards used and original murals covered at Dubdi Monastery, Sikkim |

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[55] *Sunehri* Masjid, *Palam* Masjid, *Nili* Masjid

| **Paints used on the walls of Ghrishneshwar Temple, Ellora** | **Monument painted in white and green at Jod Gumbaz, Vijayapura** |

In respect of Dubdi Monastery, Sikkim, Circle office stated that the Monk Committee for the respective monument did not co-operate and carried out the works on their own without expert advice. Though the NPC-AMASR accepts the role of local communities in conservation of living monuments, it also prohibits any change in the structure/fabric of the monument.

Ministry/ASI stated (January 2022) that except forceful attempts, the religious worship was not allowed in any monument where it was not in practice at the time of its central protection or if it was discontinued since long. ASI however did not respond to audit comments regarding (a) absence of details of monuments where prayers/worships were started before/after the issue of notification (b) non-preparation of guidelines or policy document for living monuments (c) absence of efforts for entering into MoU with users/occupants of living monuments and (d) changes made in these monuments.

7.1.3.2 *Baolis*: The ASI in a reply to Parliament (August 2010) had intimated that in Delhi Circle, fifteen water bodies (*Baolis*) were under its jurisdiction, of which two were dry and the other 13 were clean. These water bodies were being maintained by ASI as part of CPM for public viewing. *The PAC, while discussing the issue, had asked the Ministry/ASI to take care of Baolis, specifically in Delhi region.* During the follow-up audit, it was found that condition of these *Baolis* had deteriorated. ASI reported (January 2021) that out of 13 wet *Baolis*, ten had become dirty. Ministry/ASI stated (January 2022) that Covid19 lockdown had hampered conservation works which would be taken up from the forthcoming financial year.

> *Agarsen Ki Baoli*
>
> In the previous Audit Report, it was pointed out that ASI had signed MoU (in 2009) with Global Vaish Organisation (GVO) for the maintenance of *Agarsen Ki Baoli,* Delhi. In this respect, Project Implementation Committee (PIC) of ASI to define the scope and schedule of work was not constituted. Further, works agreed upon in MoU *viz.* maintenance of the monument, printing and distribution of publications, etc. was not carried out by GVO. Instead, an unauthorised Porta

Cabin in the protected area of the monument was set up by GVO for use as its office. The MoU was renewed by the ASI in January 2011 (for five years), November 2017 and November 2019 (for two years each).

During follow-up audit, it was noted that PIC had still not been constituted. Despite agreement, facilities *viz.* drinking water, toilet for ladies and gents, etc. were not provided by GVO. Further, in accordance with the terms of agreement, Porta Cabin was not converted into publication sale counter and cloak room and was still used by GVO as its office. Instead of removing the encroachment, ASI continued to extend the agreement with GVO.

7.1.3.3 Rock Edicts: These are inscriptions carved on stones containing messages of King Ashoka. *The PAC noted that there was no specific policy for preservation of Rock Edicts. It recommended ASI to make concerted efforts to ensure their conservation and preservation as they have pristine value and depict a definite era in historical evaluation of our national culture.* Joint physical verification of Ashoka Rock Edict at Udaegolam and Nittur (Hampi Circle) revealed that both the sites lacked proper approach roads and demarcated protected area. Further, translation of the rock inscriptions was also not available for the benefit of the visitors of these sites. Similarly, absence of public facilities and encroachment in the monument were noticed at the Ashoka Rock Edict in Delhi Circle.

Salimgarh Fort is another monument in the vicinity of the Red Fort complex. The Fort built in 1546 (before Red Fort) was turned into a prison during the period of Aurangzeb (capturing his brother *Murad Baksh* and daughter *Zebunissa*). During the revolt of 1857, Salimgarh Fort was used to imprison freedom fighters. Further, during India's freedom struggle, it was used as a prison to confine Indian National Army soldiers including Major General *Shah Nawaz Khan*, Major *Gurbaksh Singh Dhillon* and Captain *Prem Kumar Sehgal*.

During visit of Salimgarh Fort it was noted that the Jail built inside the monument was lying in a neglected state. There were cracks and seepage on the walls and it was not receiving much deserved care and protection for its heritage value. Ministry/ASI stated (January 2022) that the monument was included in the Annual Conservation Plan (2021-22) and the work will be carried out.

Source: Publicity material on Salimgarh Fort published by ASI

7.1.3.4 *Kos-Minar***:** *Kos-Minars*[56] are medieval infrastructure (pillars) constructed across the highways as an important part of travel and communication. In the previous Report, it was mentioned that ASI had never researched and analysed *Kos-Minars* as a specific category of monuments. During joint physical inspection of *Kos-Minars* (in Delhi and Haryana Circles) it was noted that there was no specific plan for preservation of the *Kos-Minars*. In respect of *Kos-Minar* at Gharunda, (South Karnal), Haryana, since the period covered in the previous audit (2007), no expenditure was incurred on the repair of the monument. During visits, ASI officials also acknowledged that these monuments were in need of chemical treatment for preservation.

The joint physical inspection of selected monuments revealed several shortcomings in providing facilities to the visitors. In some monuments, newly constructed toilet blocks were found non-functional (January 2021) due to non-availability of water. Further, some of the monuments were either fully encroached upon or were in a neglected state or some of their parts were closed for visitors without the approval of the competent authority *i.e.* Director General, ASI (*refer Annexe 7.1*).

7.2 Preservation and Conservation works at Monuments

One of the prime mandates of ASI is to ensure the conservation and maintenance of all protected monuments throughout the country[57]. The issues connected with conservation work of these monuments/sites are discussed here.

7.2.1 Implementing the National Policy for Conservation

The ASI had intimated the PAC about release (February 2014) of a National Policy for Conservation of the Ancient Monuments, Archaeological Sites and Remains (NPC-AMASR). During follow-up audit, it was noted that in 11 Circles[58], one or more important instructions of NPC-AMASR, as mentioned below, were not being followed properly:

a. preparation of short-term (up to two years), mid-term (two to five years) and long-term (five years and above) monitoring and maintenance plans;

b. regular inspection by the archaeological officers, at least once a year;

c. preparation of Site Management Plans (SMPs);

d. peer review of conservation work undertaken;

e. documentation of entire conservation process through maps, drawings, photographs, digital records, field notes;

f. identification of craftsman for conservation works; and

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[56] Mile pillars constructed at a distance of 3.2 kilometres *i.e.* one Kos.
[57] ASI also undertake conservation projects for State Governments and other countries.
[58] Delhi, Aurangabad, Mumbai, Kolkata, Chandigarh, Bhopal, Jabalpur, Bhubaneswar, Bengaluru, Dharwad and Hampi.

    g.   trainings to Monument in-Charge for disaster management.

NITI Aayog in its Report had also mentioned that NPC-AMASR, 2014, despite being a well-structured document covering significant aspects of conservation, was not being followed by ASI. Further, in Aurangabad, Mumbai, Bengaluru, Dharwad, Hampi and Kolkata Circles, irregularities in planning of conservation works[59] and non-preparation of Annual Conservation Plan[60] were also noticed. Any deviation from the prescribed conservation procedure in NPC-AMASR may affect the heritage conservation process. Ministry/ASI only responded (January 2022) to sub-paragraph 'c' and 'g' and stated that the process of preparing SMPs had been initiated for selected WHS and assured that respective officials will be asked to contact the concerned agencies for necessary training on disaster management.

7.2.2   Improper Preservation Works at Monuments

NPC-AMASR, 2014, contains detailed instructions regarding maintaining the original structure and fabric of the monument. Joint physical inspection of monuments in all the selected States revealed instances of improper conservation works, monuments requiring chemical conservation, changes made in the structure and neglected state of monuments of national importance. Instances of these improper conservation works carried out by ASI are illustrated in **Annexe 7.2**.

7.2.3   Management of Heritage Gardens

During joint physical inspection, cases of growth of excess vegetation were noticed at 51 monuments in the States of Delhi (11), Haryana (5), Karnataka (18), Madhya Pradesh (3), Maharashtra (7), Odisha (2) and West Bengal (5). Instances of improper garden management/excess growth of vegetation at the monuments are illustrated in **Annexe 7.3**.

Further, out of 25 heritage gardens under the jurisdiction of Horticulture Branch of ASI, three are located in Delhi. It was noticed that information on landscape of these heritage gardens[61] was not available with the concerned Horticulture Division. ASI had undertaken work to revive the ancient water channel at *Mehtab Bagh*, Red Fort, Delhi. Though *Mehtab Bagh* was identified by ASI as its archaeological garden, concerned Horticulture Division (Delhi Circle) was unaware of any such activity being undertaken and was not involved in the process. It was also noticed that there was absence of co-ordination between the Horticulture Branch and Circle office, as the works of horticulture nature *viz.* uprooting of vegetation, jungle cleaning, etc. in other parts of monuments were being executed by Circle office. Similarly, in Horticulture Division, Mysuru, instances were noticed where Circle offices were maintaining/ developing gardens without the assistance of the Horticulture Branch.

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[59] Selection of monuments for annual maintenance/special report, delay in submission of Revised Conservation Programme, approved works not undertaken, non-maintenance of log books, etc.

[60] Preparation of plan without prior information, non-preparation of estimates for approval, over estimations by Sub-Circles.

[61] Located at Humayun's Tomb, Red Fort and Safdarjung Tomb
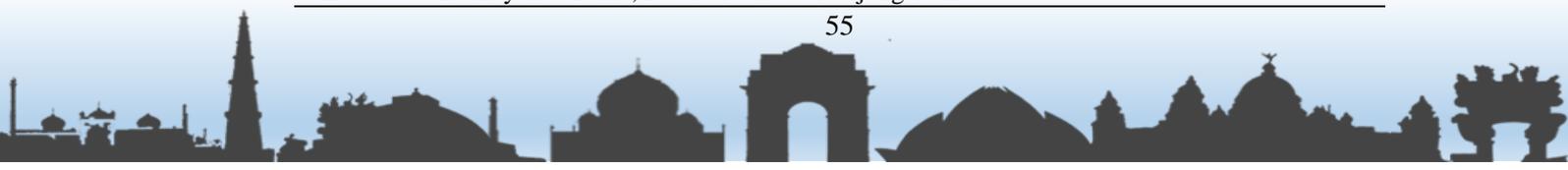
Ministry/ASI attributed (February 2022) Covid19 and shortage of human resources as the reasons for the reported status of its gardens. ASI informed that in order to have more co-ordination, its horticulture offices have been integrated with the Circle offices. Further, in respect of conservation works at Mehtab Bagh, Red Fort, it submitted that its water channel was part of the conservation work carried out by the Circle office.

7.2.4   Preservation of Estampages

Estampages are paper impression of stone or copper plate inscriptions. Estampages are preserved by Epigraphy Branch in a controlled environment to stop their deterioration. During a visit to the Estampages store of the Epigraphy Branch, Mysuru, it was noticed that the Estampages were not preserved under temperature and humidity-controlled environment.

In this respect, Epigraphy Branch stated (January 2021) that action was underway in consultation with the experts to preserve estampages in a more scientific manner for increasing their longevity.

7.3   Security and Safeguard arrangements

The PAC had observed gaps in the management of security and safeguard around important monuments and museums. *It recommended the Ministry to develop a comprehensive security policy for all monuments and museums under its control by addressing the shortage of security personnel. The PAC had also asked the Ministry to explore the possibility of taking the help of ISRO for aerial survey and installation of satellite cameras and other agencies for IT based security.* The Ministry had submitted through ATN that use of ISRO maps or satellite camera for security may not be advantageous for security purpose. It was, however, noted that ASI had entered into MoU with ISRO for a web-based utility which allows users to explore map based content prepared by ISRO.

The Ministry had brought out (March 2016) a comprehensive security policy for museums under its control (*i.e.* other than site-museums). However, ASI intimated (March 2021) that archaeological museums under ASI are mostly located near CPM, and accordingly, security guidelines issued for monuments were being followed. Audit noted that there were no separate security guidelines or standards for manpower requirement for the CPM.

Issues related with security and safeguard arrangements noticed during joint physical verification of selected monuments are included in the **Annexe 7.1**. In Mumbai and Aurangabad Circles, ASI had not deployed security personnel in 173 out of 192 monuments. In Delhi Circle, due to deployment of insufficient number of security personnel, ASI was not able to control large number of public visiting certain ticketed monuments on specific days of the week. In Karnataka, out of 45 monuments selected in three Circles (Bengaluru, Dharwad and Hampi), 26 did not have security guards. In Bhubaneswar Circle, security guards have been deployed
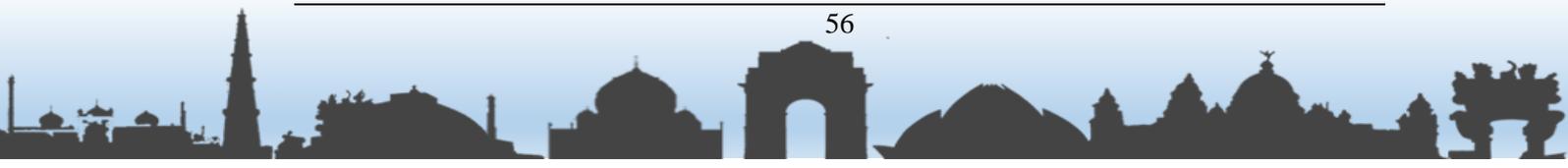
only at three monuments and three site-museums. Similarly, in Chandigarh Circle, out of total 91 CPM under Haryana Sub-circle, security equipment was provided at only one CPM.

Further, while visiting the central store of Publication Division located at Red Fort, New Delhi, it was noted that there were no fire-safety arrangements for securing the published stocks.

Conclusions:

➢ *Based on recommendation of PAC, ASI had started Adarsh Smarak Initiative in its 100 monuments to provide amenities to the visitors of these monuments.*

➢ *Joint physical inspection of selected monuments, however, revealed that in most of the monuments, concerns regarding management of monuments including provision of visitors' facilities, conservation works, security etc. remained unaddressed.*

➢ *Provisions/ instructions contained in NPC-AMASR were not being followed*

Chapter 8: Antiquities Management

Antiquities are mostly acquired and maintained by various national/State level museums across the country. Besides, antiquities found during excavations are kept and displayed by ASI at its site-museums.

8.1   National Level Museums

Under the Ministry, seven national level museums function as its subordinate offices or autonomous bodies. The Ministry had intimated the PAC that no uniform laid down procedure for management of antiquities was being followed in these museums as they were independent entities working under the direction of their Board/Society. Ministry had, however, reported to the PAC regarding steps being taken by it towards drafting and finalisation of a uniform policy for acquisition of art objects. As pointed out in Para 3.1, against the recommendation of PAC, uniform policy/procedure for all museums (except security policy mentioned in Para 7.3) had not been framed. The Ministry had also informed the PAC regarding digitation process of art objects in the museums through *JATAN* software.

In the previous Report, several observations in antiquity management *viz.* acquisition, registration, documentation, accession, physical verification, storage, display, security and human resources were made. Though the PAC had not made any specific recommendations for any national level museums, areas of concern noticed in their working during the follow-up audit are discussed below:

8.1.1   National Museum, Delhi

The Nation Museum, Delhi (NM), which was formally inaugurated in August 1949, has around 2.06 lakh works of exquisite art of both Indian and foreign origin, covering more than 5000 years of cultural heritage, in its possession. During the period 2014-15 to 2020-21, annual average fund allocation of NM was ₹ 36.65 crore against which average annual expenditure was ₹ 34.62 crore. Audit noted that concerns in the functioning of NM raised by two Committees *viz. Varadarajan* Committee (2004) and *Yechury* Committee (2011) and also mentioned in previous Report were still existing. In this regard, following observations are being made:

➢   The sanctioned strength of NM, which was 276 at the time of the earlier audit, was reduced[62] (July 2019) by the Ministry to 174, against which 36 posts were found (December 2020) vacant. Some of the posts *viz.* Additional Director General, Joint Director General, were vacant since 2014.

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[62] Including nine posts of Curator/Deputy Curator and five posts of Conservator/Deputy Conservator, Deputy Chemist.

➢ Except acquisition of objects through gifts, NM had not purchased any artefact since the period covered in the previous Report *i.e.*2007. It was noticed that the Art Purchase/Acquisition Committee of NM was defunct since 1997 and was not reconstituted, resulting in no new addition in the collection of the museum.

➢ NM had no policy/guidelines/instructions for handing/taking over of objects including their physical verification. Delay in handing/taking over of objects and their physical verification was noticed in various sections of NM. In a statement made by NM (September 2019) after the digitisation of all the artefacts and their further linking with *JATAN* Software (along with details provided in accession register), the verification process would be considered as completed[63]. However, out of 2.06 lakh artefacts, NM had digitised records of 1.73 lakh objects, of which photography/digitisation of only 0.81 lakh art objects was completed (January 2021).

➢ The *Yechury* Committee, while pointing out absence of physical verification (since 2003) of artefacts in NM, had felt that when the verification process would be taken up, some of the objects might be reported missing. The issue of discrepancy in the number of artefacts in NM was also included in the previous Report. During the current audit, it was noted that in various sections of NM, the number of objects reported were different from those mentioned by the two Committees. Further, instances of missing/untraceable artefacts in some sections of NM were also noticed.

The section-wise position regarding delay in handing/taking over/verification process and missing/untraceable artefacts are provided in **Annexe 8.1.** Some instances are illustrated below:

➢ In the Numismatic Section only ten *per cent* of coins have been physically verified. The 15 antique coins recovered (2008) from the almirah of an ex-Curator as discussed in the previous Report had still not been verified and accessioned with museum records. Due to inadequate verification, there was no record to correlate coins removed from the reserve and displayed in the gallery.

➢ In the Pre-History Section, only 1942 artefacts against 5437 objects were handed/taken over. The Curator had no information on whereabouts of the remaining artefacts. In Pre-Columbian & Western Art Section, against 2909 objects (identified by *Yechury* Committee), only 1208 were reported.

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[63] In a submission made (September 2019) by the National Museum with High Court, it was explained that as a part of the digitisation project through *JATAN*, all the information appearing in the Classified Accession Register (CAR) are entered into the system. Thereafter, every object appearing the CAR is physically verified and photographs taken as proof of physical verification.
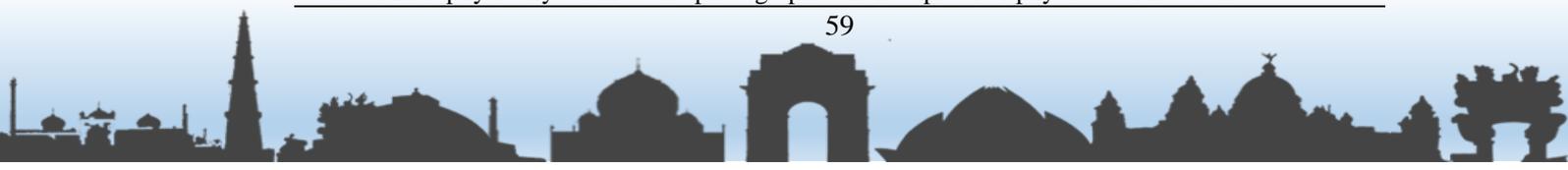
Similarly, in Anthropology Section, 501 objects were reported missing/gg untraceable.

➤ In the previous Report, it was pointed out that due to irregularities in the Accession Register of the Manuscript Section, its charge was not handed over to the new Curator. As detailed in the **Annexe 8.1**, 35 *per cent* of manuscripts (4871) have still not been physically verified.

➤ In the Painting Section, the complete handing/taking over process was pending since 2016. Audit noticed that a painting described in the accession register as *Thanka* had a missing *Buddha* picture.

| **As per accession register** | **In possession** |

The Section reported (March 2021) to audit that two paintings have been found marked with a single accession number. It had also reported (January 2020) to the museum authority that various artefacts of the Section were missing. However, there was no record of action taken by the NM (March 2021). Similarly, in the Pre-History Reserve, objects were found lying in the reserve without any accession number.

➤ NM had 26 galleries of which, Arms & Armours, Manuscripts, Paintings, Pre-Columbian & Western Art, Jewellery, Epigraphy and Textile galleries were found closed. The *Yechury* Committee had noted that apart from reasons of up-gradation/renovation, shortages of staff and display materials, galleries have also been closed for pending cases involving theft and vigilance matters. It was noted that some of the galleries *viz.* Pre-Columbian & Western Art, Manuscript, mentioned closed in previous Report have still not been opened on the pretext of their up-gradation. Further, in most of the sections, only upto nine *per cent* of art objects were on display.

On this issue, NM replied (April 2021) that the closure of the galleries was not on account of pending cases involving theft and vigilance. It further submitted that low *percentage* of antiquities on display was due to display area being less. Fact remains that the low *percentage* of display of artefacts and closure of galleries deprives the general public from experiencing our rich heritage.

➤ As mentioned in the previous Report, in the reserve collections of different Sections of NM, security cameras were also not available. Audit noted that the

art objects were being kept in rooms/sections (*e.g.* Paintings, Central Asian collection) in wooden almirah without ensuring their fire-safety.

Aurel Stein Collection–Central Asian Antiquities

Aurel Stein (1862-1943) was an archaeologist, known for his explorations and discoveries. Amongst the non-Indian collections of NM, the Central Asian Arts Collection is a significant one as it has some of the most outstanding wall paintings, silk banners, sculptures, art objects, etc. This collection was explored and collected by Aurel Stein, during 1900-1916, on three major expeditions.

In the previous Audit Report, it was pointed out that a part of this collection consisting of 700 art objects was loaned to Victoria & Albert (V&A) Museum, London by Government of India (through ASI) between 1923 and 1933. The loaned art objects have not been received back[64]. It was noted that no effort was made to retrieve the collection from V&A Museum. Further, some of the objects from this collection were still lying in the conservation lab of NM (for over 50 years).

Source: CAG Report No. 18 of 2013 (Page 142)

➢ During the follow-up audit, it was noted that priceless statues of NM were lying in an unsecured environment, gathering dust as depicted in following photographs and **Annexe 8.2**.

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[64] According to V&A website V&A The Stein Collection (vam.ac.uk) the collection, on loan from the Government of India, includes nearly 600 textile fragments and over 70 ceramic and Buddhist objects dating between 200 BC and 1200 AD.

8.1.2   Asiatic Society, Mumbai

The Mumbai Branch of the Royal Asiatic Society was founded in 1826 by merging the Literary Society of Bombay with the Royal Asiatic Society of Great Britain and Ireland. Asiatic Society, Mumbai (ASM) is a Library and Research Society in possession of Buddhist relics, antique coins, manuscripts etc. During audit it was noted that except for coins, ASM was not maintaining any Accession Register. The work regarding cataloguing of coins, started in 2014-15, was still incomplete and the physical verification of coins and other antiquities was pending since 2008.

8.1.3   Salarjung Museum, Telangana

The Salarjung Museum, Hyderabad (SJM) was established in 1951 and was declared as an institution of national importance in 1961. It has a collection of art objects and antiquities acquired from all over the globe. Audit observed the following during the period 2013-14 to 2020-21:

➢ SJM Act, 1961, provides for a Board to manage the museum efficiently and to plan, promote, organise and implement the development of the museum. The Board had met only twice during the period against the mandatory four meetings (at least) in a year adding to a total 28 required meetings. As such, apex level advise for effective management of the museum was not available. Shortfall of similar nature in the scheduled meetings of sub-committees *i.e.* Executive Committee (71.43 *per cent*), Finance Committee (35.71 *per cent*) and Building Advisory Committee ((85.71 *per cent*) was also noticed.

➢ The sanctioned strength of SJM was 166 at the time of earlier audit which was reduced to 140 in 2020-21. Against the reduced strength, the overall shortage of manpower (ranging from 20 months to 16 years) was 46 *i.e.* 32.86 *per cent* (including 21 posts of technical staff). SJM replied (June 2021) that due to budget constraints, posts could not be filled.

➢ During the period 2014-15 to 2020-21, annual average fund allocation of SJM was ₹ 24.33 crore. As the grants were not being allocated separately for preservation and conservation activities, such works were being undertaken on the basis of priority and availability. During this period, (2014-20) expenditure on preservation and conservation activities (including expenditure on upgradation of security system, digitisation, etc.) ranged from 0.09 to 5.83 *per cent*.

➢ SJM had not acquired any new artefacts and its Art Acquisition Committee was not constituted. SJM replied (June 2021) that there was no acquisition after 1992 and the Committee was not constituted as it was felt that no new item would fit in SJM collection and the process would involve huge costs.

➢ SJM was in possession of 46,216 art objects, 8,191 manuscripts and 69,225 books. Out of 46,216 art objects, 16,606 objects were displayed by it and 29,610 (64 *per cent*) were kept in reserve. It was noted that SJM had no rotation policy. In this regard, SJM replied that in view of gallery designs, prime and limited displayed artefacts, objects from reserves were being displayed wherever possible or on special occasions/exhibitions. The reply was not tenable, as absence of rotation/display policy results in many of the art objects lying in reserve without being ever put on display and, thereby, depriving the visitors from an enhanced experience.

➢ Physical verification certificates in respect of art objects were issued without date, name and seal of the verifying authority as depicted in **Annexe 8.3**. Further, SJM had no guidelines for evaluation of genuineness of art objects.

SJM replied (April 2021) that the genuineness of art objects was being verified during the process of their physical verification and the aspect of formulation of relevant guidelines would be placed before the Board for approval. Reply of SJM was, however, not acceptable as the physical verification process was a routine procedure and not undertaken with the objective to assess the genuineness of the objects.

➢ SJM had digitised 100 *per cent* of art objects and 54 *per cent* of manuscripts. It carried out RFID tagging of all books and manuscripts. However, in respect of art objects, RFID tagging of only 10,000 objects (22 *per cent*) was conducted. SJM stated that the digitisation work of manuscripts would be completed in the next two years while the limited numbers of RFID tagging was on account of the Ministry's project quota.

➢ SJM was unable to up-grade its existing CCTV cameras as recommended by its security agency *i.e.* Central Industrial Security Force due to budget constraints. Further, in the absence of policy/guidelines, expenditure of SJM on preservation and conservation activities (including up-gradation of security system, digitisation, etc.) ranged between 0.09 and 5.83 *per cent* of its total expenditure.

8.1.4   Victoria Memorial Hall Museum, Kolkata

The Victoria Memorial Hall Museum, Kolkata (VMH) was established under the Victoria Memorial Act, 1903 and was declared as institution of national importance in 1935. VMH has a collection of sketches and drawing, coins and medals, arms and armour, books and manuscripts, etc. Audit observed the following during the period 2014-15 to 2020-21:

- The vacancy position of VMH had increased from 30.1 *per cent* (during earlier audit) to 53.7 *per cent.* Out of 175 sanctioned posts, 94 posts were vacant for period ranging from three months to 32 years.

- During the period 2014-15 to 2019-20, annual average fund allocation of VMH was ₹ 37.49 crore against which average annual utilisation was ₹ 27.37 crore, indicating poor utilisation of allocated grants.

- Since the period covered in previous Report *i.e.* 2007, VMH had not acquired any new artefacts. VMH was in possession of 33,497 artefacts[65], of which 28,394 (85 *per cent*) have been accessioned and 26,611 (79 *per cent*) were digitised/documented. Apart from incomplete documentation, the Accession Register of VMH was found to be in bad condition without any soft copy backup. Also, only 18 *per cent* objects have been tagged for RFID.

- In the previous Report it was pointed out that out of 28,394 artefacts with VMH, 18,979 remained unverified in respect to their antique and intrinsic value. It was noted that during 2017-18, VMH had conducted physical verification of its objects. However, concerned report was not prepared by it.

  VMH, in its reply, assured that initiative would be taken to complete physical verification and authentication of its collection.

- Out of 33,497 objects available with it, VMH had displayed only 817 objects (2.44 *per cent*) in the galleries (March 2020). VMH stated that efforts were made to rotate the artefacts in display through temporary exhibition, objects-of the-month display and changes in permanent exhibition. Facts remain that the number of objects displayed in the gallery was very low. Also, various galleries of VMH *viz.* Portrait gallery, Indian School of Art, Queen's Hall, etc. had remained closed for period upto 23 months on account of their renovation or repair.

- *Rabindra Bharati* Society had provided 5,103 paintings to VMH (2011) on loan. According to the terms of agreement (2007), VMH was to pay loan amount of ₹ 10 lakh annually to *Rabindra Bharati* Society. However, only nine paintings were displayed and VMH was unable to utilise the remaining paintings. Further, physical verification of 303 acquired paintings had not been carried out by VMH.

- Against the recommendation of its Security Committee for two Baggage Scanners and 13 Hand-held Metal Detectors, VMH was in possession of only one and six such machines. The museum had not installed any Air-conditioners in its storerooms while CCTV cameras had been installed in only three out of eight stores. VMH had no fire alarm, smoke detectors, sprinklers, etc. and there

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[65] 33,493 as per previous report

was no firefighting equipment in the stores. Despite purchase of four data loggers (March 2015) for recording environmental parameters, same have not been put to use.

8.1.5   Indian Museum, Kolkata

The Indian Museum, Kolkata (IM) was founded in 1814 and is the largest and the oldest institution of its kind in the Asia Pacific Region. The Museum is a repository of both Indian and trans-Indian objects displayed through 35 galleries. In the previous Report, it was pointed out that the Institute had failed to formulate a uniform conservation policy resulting in deterioration of its artefacts. In this regard, IM stated that the policy was awaiting approval of the Ministry since 2015.

During the period 2014-15 to 2019-20, annual average fund allocation of IM was ₹ 22.25 crore against which average annual utilisation was ₹ 21.36 crore. During 2018-19 and 2019-20, the allocation had shown *percentage* growth of 64.5 and 88.2 respectively. Other observations on the working of IM are illustrated below:

➢ The vacancy position of IM had increased from 28.7 *per cent* (during earlier audit) to 58.9 *per cent.* Out of 209 sanctioned posts, 123 posts were vacant for a period ranging from six months to 25 years.

➢ IM had not acquired any new artefacts. IM was in possession of 1,08,000 artefacts, of which 72,984 (67 *per cent*) have been accessioned and 46,008 (43 *per cent*) were digitised. IM had photo documented its 60,224 objects while only eight *per cent* objects have been tagged for RFID. Further, repetition of accession numbers was observed as different sections were maintaining their own accession registers.

➢ In the previous Report, it was pointed out that physical verification of objects in IM (started in 2005) was completed for 38 *per cent* of the artefacts (upto March 2012). During audit it was noted that 11 *per cent* of the objects had still not been verified (March 2020). Further, survey to identify the objects requiring conservation was also not conducted by IM. Instances of improper conservation work noticed at IM are depicted below:

Patch work was noticed in the *Gajasurasamhara* **Murti of Shiva**	**The red sand stone** *Yakshi* **had been entirely changed into black.**

IM accepted the observation on improper patch work. In respect of *Yakshi*, it stated that this was due to darkening of the coating, with added pigment. It also mentioned possibility of deposit of pollutants, as the statue was situated near to a road.

➢ Out of 1,08,000 objects available with it, IM had displayed 2,554 objects (2.36 *per cent*) in the gallery (March 2020). In this regard, IM replied that in the public interest, rotation of artefacts was maintained by means of holding exhibition inside and outside the museum arena. However, there was no rotation policy and number of objects displayed in the gallery was very low. Further, due to renovation/repair related issues, some of the galleries *viz.* Cultural Anthropology Gallery, Bronze Gallery, Pre-Proto History, South East Asian Gallery had remained closed during the period covered under audit. Status of artefacts displayed at the galleries is depicted in **Annexe 8.2.**

➢ Air-conditioners for controlling the ideal temperature and CCTV cameras had not been installed in the stores. The museum had no fire alarms, smoke detectors, sprinklers and fire extinguishers have been provided in only five stores (out of ten).

8.1.6   Asiatic Society, Kolkata

The Asiatic Society, Kolkata (ASK) was founded in 1784 by Sir William Jones and was declared as an institution of national importance in 1984. ASK has large collections of paintings, manuscripts, coins etc. During the period 2014-15 to 2020-21, annual average fund allocation of ASK was ₹ 24.09 crore against which average annual utilisation was ₹ 22.29 crore. In respect of ASK following was noted:

➢ The vacancy position of ASK had increased from 17.5 *per cent* (during earlier audit) to 31.9 *per cent.* Out of 254 sanctioned posts, 81 posts were vacant for period ranging between two months and 24 years seven months.

➢ Based on recommendations of Art Purchase Committee, ASK had acquired 166 art objects (including 35 gifts) during 2015 and 2017. However, due to absence of defined procedures for ensuring the genuineness of acquired antiquities, it was able to verify only 10 objects through ASI.

➢ ASK was in possession of 3,01,626 artefacts, of which 2,86,363 (95 *per cent*) were accessioned. However, ASK had digitised and photo documented only 9,165 (five *per cent*) and 1,774 (three *per cent*) objects respectively. It assured audit regarding formation of a committee to finalise the remaining work. In addition to poor documentation process, ASK did not have any back-up copy of its Accession Registers.

➢ In the previous Report, it was mentioned that rare coins available with ASK had never been counted and physically verified. During the follow-up audit, it was noted that the position regarding number of available coins and their

verification had remained unchanged. Except paintings and manuscripts, busts, stone sculptures, coins had never been surveyed by ASK for their conservation. Further, in respect of ten *per cent* of manuscripts identified for immediate restoration, work had been delayed for last two years. Conservation status of artefacts at ASK is also depicted in **Annexe 8.2.**

➢ No unique pattern of accessioning was found to be followed by ASK[66]. The maps held by ASK had not been assigned any accession numbers.

➢ Security equipment *viz.* Door-Framed Metal Detectors, Baggage Scanners, Walky-talkies, etc. were not available with ASK and it had not undertaken any exercise to assess its requirement. Out of 180 CCTV cameras installed by the ASK, 80 were non-functional. Except fire extinguishers, no fire alarms, smoke detectors, sprinklers etc. had been installed.

8.2   ASI Site-Museums

The ASI had 50 archaeological site-museums under its jurisdiction spread all over the country. In respect of site-museums, Ministry had intimated the PAC that a broad policy prepared in 1915 was being re-examined and re-defined. It informed that a draft document on vision, mission and guidelines for archaeological museums is being finalised. However, as observed in Para 3.1, the guidelines, being implemented for ASI site-museums was not a comprehensive document as recommended by PAC. ASI had incurred expenditure aggregating ₹ 58.34 crore on the maintenance of its site-museums during the period 2013-14 to 2019-20. During the follow-up audit, 23 ASI site-museums were examined and the findings are discussed below:

8.2.1   ASI had five site-museums in Madhya Pradesh at Chanderi, Gwalior, Khajuraho, Sanchi and Shivpuri.

➢ The overall shortage of men-in-position at the five site-museums ranged between 25 and 67 *per cent* of sanctioned strength. Against, the mandatory posts[67] of one Assistant Superintendent Archaeologists (ASA) and two Assistant Archaeologist (AA) for each site-museum, only three posts of ASA and AA (to look after all five site-museums) have been sanctioned.

➢ None of the site-museums had any rotation policy for displaying the objects. In all the museums, except Chanderi, total objects kept in reserve ranged from 76 to 99 *per cent.* During 2013-14 to 2019-20, physical verification of objects had

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[66] Objects accessioned according to their serial numbers, year of accession or their types
[67] Para 6.8 of guidelines for ASI Museums

not been conducted in four site-museums, except at Sanchi (conducted in 2015).

➢ In three site-museums *viz.* Chanderi, Gwalior and Shivpuri, description in respect of many artefacts kept in galleries was not available. At site-museum, Gwalior, photo documentation of many art objects and mention of their accession numbers in documented photos were not made.

➢ Antiquities kept in reserve at site-museum, Gwalior were found in a deplorable condition. At site-museum, Chanderi, 407 objects were displayed in the open without any CCTV camera. As the whole area was covered with a thin wire fencing, their display in the open is fraught with the risk of theft/loss or deterioration due to weather.

Ministry/ASI stated (January 2022) that they have posted ASA for site-museums in Madhya Pradesh since December 2021. Further, all in-charge site-museums have been directed to regularly rotate and verify the exhibits.

8.2.2 ASI had three site-museums at its Kolkata Circle *viz.* (i) *Hazarduari* Palace Museum, Murshidabad, (ii) *Cooch Behar* Palace Museum, Cooch Behar, and (iii) Archaeological Museum, Tamluk.

➢ *Cooch Behar* Palace Museum had accessioned only 4.9 *per cent* of available 6,963 artefacts. This was due to non-verification of genuineness of available antiquities. Further, in Archaeological Museum, Tamluk, only 3.6 *per cent* of available 8,074 objects have been digitised.

➢ The three site-museums were found to be displaying only 3.2 *per cent* to 13.5 *per cent* of the objects kept by them. There was absence of rotation policy for displaying the artefacts. The physical verification of antiquities had not been conducted during 2013-14 to 2019-20.

➢ Though more than 87 *per cent* of the artefacts were kept in reserve there was absence of storage facilities with effective air-conditioning, humidity control system, CCTV camera, etc.

➢ During joint physical inspection of these site-museums, public amenities *viz.* guide service, parking, facility for physically challenged, complaint register, etc. were not found available.

Ministry/ASI stated (January 2022) that digitisation of all the three museums under Kolkata Circle including provision of humidity control, surveillance systems, and amenities would be completed by March 2023.

8.2.3   ASI had six site-museums in Karnataka at Srirangapatna, Halebeedu, Aihole, Badami, Vijaypura and Hampi.

➤   None of the site-museum had any rotation policy for displaying the objects. In all the museums, except Badami, total objects kept in reserve ranged from 53 to 94 *per cent.* In Vijaypura, site-museum none of the object was digitised.

➤   In four site-museums *viz.* Aihole, Badami, Halebeedu and Hampi, description in respect of many artefacts displayed was not available. At site-museum, Halebeedu, an artefact (wooden doorsill) was displayed without taking it into accession. Similarly, in Aihole site-museum, sculptures were found lying near the boundary wall and backyard without their being taken into accession.

➤   At Halebeedu site-museum, dust and sand had gathered over the sculptures displayed in the gallery. Fungus and moss had accumulated over most of the sculptures/artefacts lying in the open reserve collection and required chemical conservation as depicted in the following photographs:

| **Displayed sculpture covered in dust** | **Fungus formed on sculptures** | **Damaged fencing** |

➤   At Halebeedu site-museum, undocumented artefacts had been kept in a room with a broken gate. Out of 12 CCTV cameras, two were not functional. Also, the fire extinguishers in the museums were not functional.

Ministry/ASI stated (January 2022) that all sculptures lying in the Aihole museum premises had been documented and shifted to a safer location. Further sculptures in the Halebeedu museum were being scientifically preserved.

8.2.4   ASI had five site-museums in Delhi Circle (four at Red Fort and one at *Purana Qila*). However, ASA was not posted in any of them. In the previous Report, it was pointed out that four stolen antiquities of the Indian War Memorial Museum, Red Fort were lying with the Daryaganj Police Station since 1989.

Ministry/ASI stated (January 2022) that they had posted ASA for site-museums in Delhi Circle since December 2021 and had received two antiquities from the Police Station.

8.2.5 ASI had three site-museums at Konark, Ratnagiri and Lalitgiri in Odisha.

➢ Physical verification of antiquities at site-museum Konark was not conducted during the period 2016-17 to 2019-20. The Circle office assured that the verification would be done soon. It was noted that an Expert Committee had reported (December 2015) 13 antiquities to be untraceable. However, no effort was made to trace the missing antiquities.

➢ Audit noticed that antiquities of site-museum were lying at the monument (Sun Temple, Konark) instead of being placed at the museum.

➢ None of the site-museums had any rotation policy for displaying the objects. In Ratnagiri site-museum, out of 3,540 artefacts, 92.9 *per cent* (3,288) were kept in reserve. Only 1.7 *per cent* (60) of the objects were digitised. Further, Circle office intimated that the digitisation work would be taken up after approval from ASI Headquarters regarding engagement of required manpower.

Ministry/ASI stated (January 2022) that all museums had been directed to adopt rotation policy and verify antiquities once in a year. Further, the expert Committee had traced four antiquities while efforts for others were being made. It also intimated that artefacts kept in the open at Konark were being properly displayed and their digitisation work was in progress.

8.3 Other Museums under ASI

Audit observations from other museums/repository under ASI are discussed below:

8.3.1 Central Antiquity Collection

The Central Antiquity Collection (CAC) at *Purana Qila*, Delhi was established by ASI in 1960 for storing antiquities/artefacts collected during surveys, explorations, excavations and confiscations. CAC is a rich repository of rare antiquities collected from various parts of the country. Audit noted that some of the confiscated and retrieved antiquities have been put on display for general public (since August 2019). Notable improvement in storing of artefacts at CAC reserve since the previous Report was also noticed as depicted in the following photographs:

Condition of antiquities at CAC –previous Report	New gallery and reserve collection of CAC –follow-up audit

However, there was still no provision for controlled air environment for the antiquities. CCTV cameras and other security equipment were not installed at CAC reserve. Despite having a huge collection of AA/A (very rare and rare) category of antiquities, CAC was managed by only one Assistant Archaeologist.

8.3.2   Maritime Archaeology Museum

The PAC had desired that maritime museums displaying antiquities and monuments of India's great maritime past may be established at appropriate location. The Ministry/ASI had informed (April 2016) the PAC about their proposal regarding opening of maritime museum in Mumbai. Though no such museum was found opened by the Ministry/ASI, it was noted that Ministry of Shipping had initiated (February 2020), construction of National Maritime Heritage Complex (NMHC) at Lothal, Gujarat which proposed to house National Maritime Museum, Maritime Heritage based theme park, Maritime Research Institute, etc.

8.3.3   Development of sculpture sheds as Site-Museums

In the previous Report it was pointed out that despite recommendation made in 2009 by a sub-committee of CABA regarding converting the existing sculpture sheds and other sites into site-museums, progress had not been made. Audit had pointed out that there was no progress in this regard.

During the follow-up audit a joint physical inspection at Rabdentse site, Sikkim (Kolkata Circle) visited during the previous audit was undertaken. As reported earlier, the artefacts were still being placed at the shed without accession numbers while glass boxes built for the purpose were empty. Though the Circle office stated that this was only a sculpture shed, it was unable to take any corrective action on the issue highlighted earlier.

Ministry/ASI stated (January 2022) that comprehensive documentation as per NMMA format was in progress. However, reason for not taking any action on observation made in previous Report was not provided.

8.3.4   ASI's Children Museum

The ASI's Children Museum, is a replica museum located in New Delhi. The Museum was specifically created to educate children on the cultural, archaeological and historical heritage of India through approximately 50 numbers of replicated structures of famous antiquities. ASI reported (December 2020) that annual footfall to the Museum was 1,500-2,000. During inspection it was noted that various replicas were displayed in the Children Museum without showing their cultural history. Further, no dedicated staff or budget was being provided for the Museum and ASI had not undertaken any initiative for its publicity or awareness.

Ministry/ASI stated (January 2022) that process of refurbishment of the Children Museum was under progress.

> **Conclusions:**
>
> *In the national level museums and site-museums under the Ministry/ASI, issues related to management of antiquities viz. shortage of staff, lack of digitisation and accession of artefacts, their display, verification, conservation, storage and security were still existing. These concerns already pointed out in the previous Report were affecting the effective working of these museums*
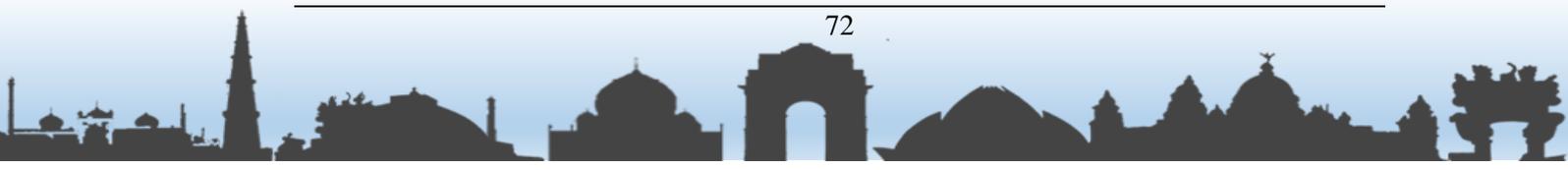
Chapter 9: Explorations and Excavations

Excavation of archaeological remains is one of the primary responsibilities of the ASI. In this chapter, audit observations connected with exploration and excavation related activity of ASI have been discussed.

9.1 Exploration activities in ASI

Exploration forms part of excavation activities which include functions such as excavation, exploration, building survey, temple survey, pre-history, under-water archaeology and village to village survey. ASI has dedicated branches for undertaking these activities.

9.1.1 Village to Village Survey

In the previous Report, audit had pointed out that due to shortage of human resources, village to village survey was not being undertaken by ASI. Though the village survey process was restarted by ASI, it was not uniformly undertaken in all the Circles. During 2014-15 to 2019-20, no survey was conducted in four Circles[68] while in four Circles[69] survey was conducted only in a single year. ASI did not provide any specific reason for undertaking village survey in selected Circles/year. However, some of its Circles cited shortages of human resources as the reason for fewer village surveys.

Ministry/ASI stated (January 2022) that all Circles have been instructed to include village to village survey in their annual strategy plan.

9.1.2 Maritime Archaeology

Maritime archaeology is a specialist branch in ASI for its under-water exploration. In the previous Report it was pointed out that the branch, established in 2001, had become defunct due to lack of specialised human resources. During the follow-up audit, it was noted that the status had not changed. Apart from shortage of human resources, there was no perspective plan or policy with ASI for maritime archaeology.

Ministry/ASI intimated (January 2022) that the thrust of training the willing archaeologist for underwater archaeological exploration had been recognized and initiated and accordingly, a separate cell in ASI to focus on this area had been strengthened.

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[68] Amravati, Delhi, Guwahati and Srinagar
[69] Bhubaneswar, Hampi–Mini Circle, Jodhpur and Mumbai

9.2 Excavation activities in ASI

Excavations at archaeological sites is an important function of ASI. The ASI grant excavation licences, based on the proposals received from different agencies like ASI Circles, Branches, Universities and Research institutions. *The PAC while discussing the excavation related issues had asked the Ministry to draw an action plan under the exploration and excavation policy and ensure adequate allocation and effective utilisation of funds for these activities.*

During the follow-up audit, it was noted that the recommendations made by the PAC and below mentioned excavation related issues as highlighted in the previous Report have not been resolved:

➢ The ASI had no action plans based on its Exploration and Excavation Policy. The excavation work was being undertaken without any priority list, perspective plan or setting up measurable performance parameters and guidelines.

➢ ASI had no centralised information/monitoring system displaying excavation proposals received by it, reasons for their recommendation or rejection, status of accepted proposals and their monitoring.

➢ There was significant delay in writing of the report on excavation. In some cases, reports were pending for more than 60 years. For some major excavations *e.g.* Mathura, Sravasti, Ropar, started in 1954-55, 1958-59 and 1953-54 respectively, reports were yet to be completed. In this regard, ASI had reported constraints that due to expiry and retirement of the excavator the work of report writing get delayed.

➢ In Bhubaneswar Circle, antiquities recovered from excavation sites (since 2011-12) were found to be kept by excavators for report writing. Also, out of 5,915 antiquities pointed out in previous Report as kept in store of Excavation Branch, 4,272 were still at the store room of which only 449 were documented.

➢ The expenditure on exploration/excavation was still below one *per cent* of total expenditure of ASI (*refer Para 5.1.1*).

In the previous Report, status of excavation sites and their protection was commented upon by audit. Neglected condition of excavated site at *Purana Qila*, Delhi, which was regularly used by ASI for excavation since 1954, noticed during joint physical inspection is depicted through photograph below:

| Last excavation done in November 2019 | During follow-up audit in January 2021 |

Protection of Archaeological Sites

The Excavation Policy of ASI identifies over 500 archaeological sites in India as important for excavation/exploration. From the list, two sites in Delhi region *viz.* Mandoli and Bhorgarh were last excavated by Delhi State Archaeological Department in 1987 and 1992-94 respectively[70]. According to the excavation reports, the findings had revealed vestiges of Late-Harappan period. It was noted that despite important findings, further action to secure these sites was not taken. During the follow-up audit, visits to these two sites revealed that both have been fully encroached upon and were no longer in existence.

Ministry/ASI intimated (January 2022) that efforts were being made to conserve the excavated remains immediately after their exposure[71].

The PAC had desired focused streamlining of the public resources earmarked for excavation and exploration of archaeological remains. However, in the absence of action plan, adequate allocation of funds and monitoring, there continues to be no assurance on concerns raised.

Ministry/ASI stated (January/February 2022) that the draft excavation policy incorporating all observations and comments would be shortly finalised. A monitoring format for excavation activities was being put in place and respective regional officers were being involved.

It accepted the delay in writing of excavation reports and submitted that this was being prioritised and the new policy also takes this issue into account. In respect of observation pertaining to Bhubaneswar Circle it submitted that the documentation of antiquities recovered from excavation was being prepared.

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[70] ASI and its officials were involved in the previous excavations of these sites.
[71] Excavated sites *viz.* Gottiprolu, Andhra Pradesh (2018-2020) and Sitagarha, Jharkhand (2020-21) selected for protection in view of their importance and exposed structure.

9.2.1 Excavation at Kanaganahalli, Dharwad, Karnataka

Kanaganahalli is an important and rare Buddhist site under ASI Dharwad Circle. The excavations at the site carried out by ASI (between 1994-2001) had revealed remains of a unique Mahastupa, pre-historic artefacts, structural remains and ancient vestiges dating back to first century BCE[72]. In response to shortcomings in conservation and protection of the site, as pointed out in the previous Report, ASI informed about various steps taken by it. These include construction of temporary sheds for excavated panels, their chemical preservation works and creation of a Committee (in July 2020) to suggest suitable measures for the preservation and conservation of the excavated site. Joint physical inspection carried out during the follow-up audit revealed that following concerns at the excavated site were still persisting.

➢ Even after 20 years of excavation and reporting by audit, the panels and other remains of the site were lying scattered in open, subject to vagaries of nature.

➢ Walls of the closed sculpture shed created for preservation of Buddha idol had developed big cracks. Cement beds created at the open shed for placing artefacts had cracked.

➢ The site spread over an area of 23 acres was covered with thick vegetation and grass posing fire threat to the artefacts. The CCTV camera installed at the site was not functional while the lighting system was not adequate.

Scattered panels at the excavated Kanaganahalli site

Previous Report	**Follow-up audit**
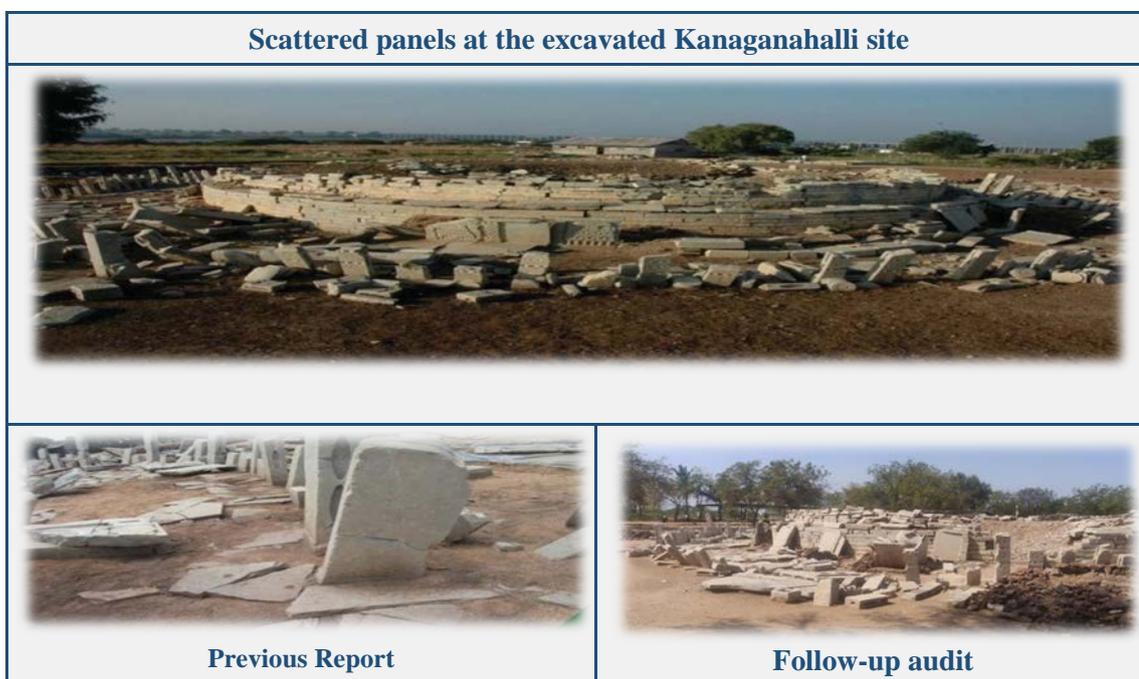
Ministry/ASI stated (January 2022) that the conservation of the excavated remains of *Kanaganahalli* and providing shelters/shifting to the nearest building will be its priority in the coming financial year 2022-23.

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[72] Case Study 6 at Page 111 of CAG Report No. 18 of 2013

Shifting of Antiquities discovered during excavation at Sanauli

During the year 2018-19, ASI's Institute of Archaeology had undertaken excavation at ancient site of Sanauli in District Baghpat, Uttar Pradesh. The major excavation finds were life size chariots, implements like swords, chisel, knife, mirror, combs, etc. made of copper and dating back to 2000 BC to 1800 BC.

The discoveries from archaeological excavation at Sanauli were considered significant as they provided a new insight into the chalcolithic culture of the Indian sub-continent and provided data for interpretation of Great ancient Indian literatures such as *Vedas*, the *Mahabharata*, etc[73].

Artistic visualisation of excavated chariot.

It was noted that after their discovery at Sanauli, ASI had shifted all the valuable antiquities to Red Fort, Delhi and then again to the newly created office at Greater Noida. As mentioned in Para 6.4, there was no policy or standards for shifting these antiquities. However, ASI intimated (December 2020) that while moving antiquities it takes utmost precaution regarding their safety.

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[73] Illustrated report on the discoveries at Sanauli, UP- published by ASI
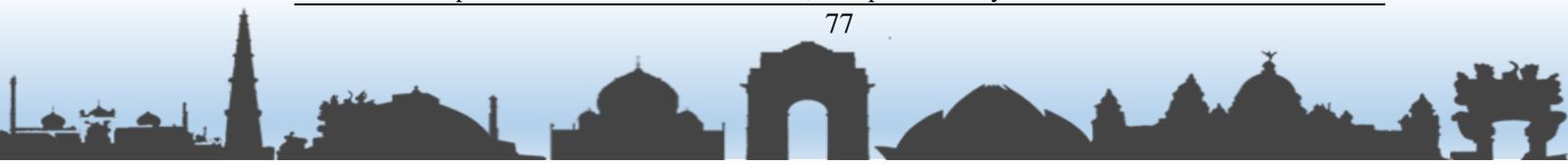
Conclusions:

Issues connected with exploration and excavation activities viz. non-existence of action plan, absence of centralized information and monitoring mechanism for excavation activities, delay in report writing work, insufficient budget allocation etc. as pointed out in previous Report have not been resolved.

Chapter 10: Good Practices in Heritage Conservation

As part of its World Heritage Capacity Building Strategy, UNESCO had been sharing best practices in heritage conservation. In the previous Report, practices followed by Victoria and Albert Museum, London and *Chatrapati Shivaji Maharaj Vastu Sangrahalaya*, Mumbai were discussed as examples of good practices in museum management. ASI had also shown its technical capability in heritage management through conservation activities undertaken at national and international levels. The restoration work undertaken by ASI at *Rani-ki-Vav,* a stepwell situated in Patan, Gujarat is depicted in the following photographs:
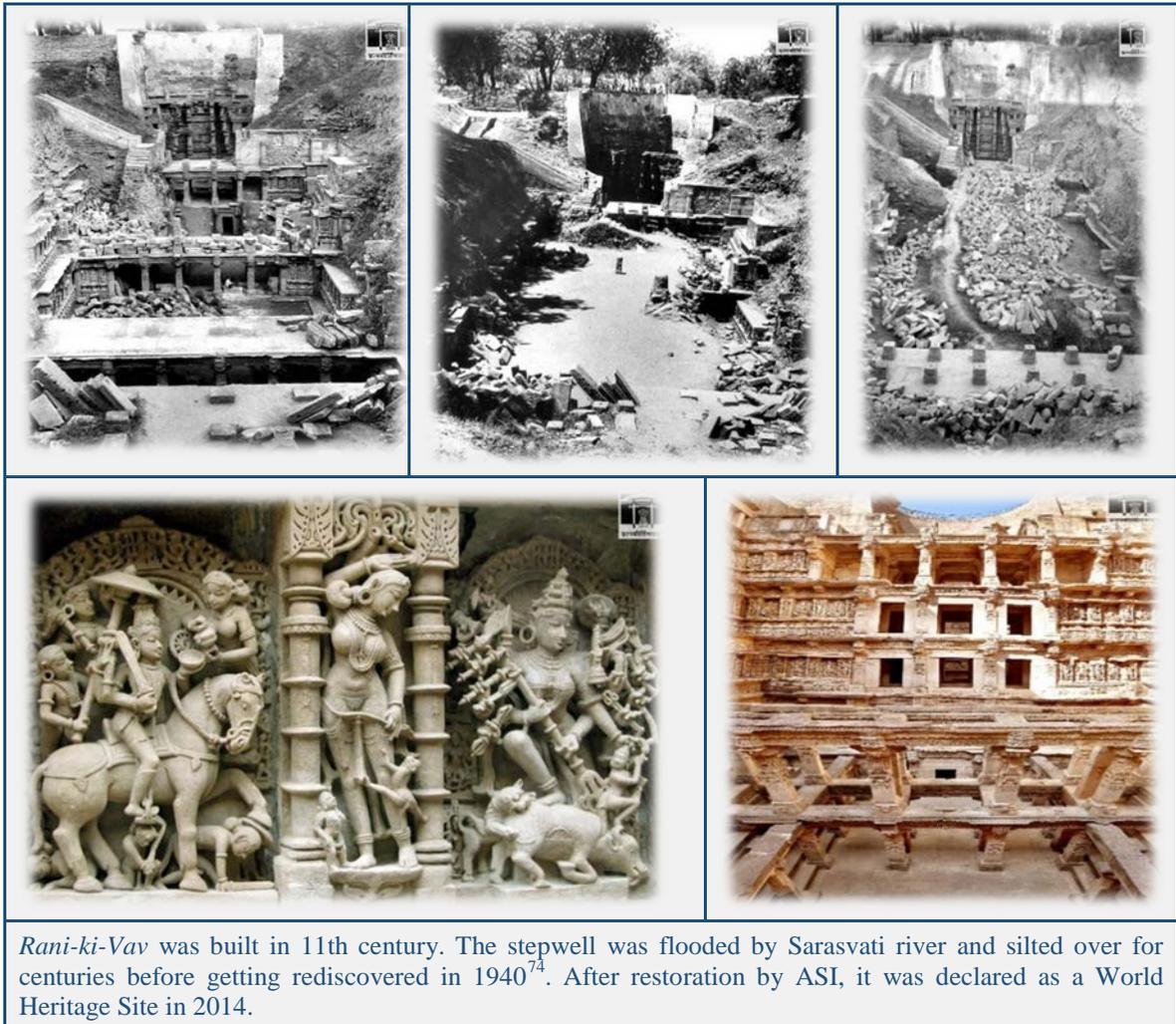
Rani-ki-Vav was built in 11th century. The stepwell was flooded by Sarasvati river and silted over for centuries before getting rediscovered in 1940[74]. After restoration by ASI, it was declared as a World Heritage Site in 2014.

Recent projects undertaken by the Government *viz. Adarsh Smarak*, Monument *Mitras*, HRIDAY[75], agreement with ISRO for monument mapping, are also examples of good initiatives undertaken by ASI in heritage conservation. During the follow-up audit, some of the concern areas were examined with a view to identify best practices followed elsewhere. These examples, as discussed below, could be considered by the Ministry in addressing the relevant issues.

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[74] Source: ASI
[75] Heritage City Development and Augmentation Yojana (HRIDAY) scheme launched by the Ministry of Housing and Urban Affairs

A.   Database of Monuments and Antiquities

The work regarding preparation of database of all monuments and antiquities in the country by NMMA had been lagging. Similarly, PAC recommendation regarding creation of an inventory of all CPMs displaying to the public various information had not been implemented.

Audit noted that the digital management of archaeological sites/objects is an initiative followed by universities and governments in the world. A 'Heritage Information System' can provide a framework to store and organize all monument/antiquities related information to generate a central database to facilitate inquiries, research and better heritage management works. Integration of similar process with the data base of monuments and antiquities (under process) will facilitate a comprehensive and dynamic heritage information and management system in the country.

(Paras 6.1 and 6.2)

B.   Antiquities declared as monuments

The AMASR Act defines any coin, sculpture, manuscript, epigraph or other work of art/craftsmanship including article, object or thing detached from a building or cave as antiquity. However, as illustrated in Annexe 6.2 (d), canons, guns statues have also been notified by ASI as independent monuments.

Jahan Kosa **Gun, an antiqtuity notified as monument**

It was noted that relevant laws of many countries *viz.* Iraq, Jordan, Syria, Saudi Arab, define their antiquities as movable or immovable. The issue of incorrect declaration of an immovable antiquities as monument (*e.g.* statue carved on a stone, immovable mounted cannons) could be resolved by further elaborating the definition and notification of antiquities as movable/immovable.

{Para 6.3.4(d)}

C.   Management of Antiquities in the Museum

The management of antiquities begins with their acquisition, followed by accession, safe placement in the museum gallery, reserve or at sculpture shed. In this Report, several issues on antiquity management *viz.* absence of database of artefacts, incomplete handing/taking over, their verification, storage and display, have been pointed out. In this regard, the best example of collection management mentioned by the Ministry[76] was at Glasgow Museum Resource Centre (GMRC), Scotland. According to the Ministry, GMRC had a comprehensive security system for storing about 10 lakh objects from seven regional museums of Scotland managed through computerised records, location charts and interlocking areas. The concerns raised by audit could be resolved through a centralised storage centre of artefacts with computerised database system for their management.

(Para 8.1)

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[76] In Comprehensive security policy for museums documented by the Ministry

Chapter 11: Conclusions and Recommendations

The Public Account Committee (PAC), after thorough study, review and discussions of CAG's Performance Audit Report on Preservation and Conservation of Monuments and Antiquities (No. 18 of 2013), had made several recommendations vide reports No. 39 (April 2016) and 118 (December 2018)) for better management of Monuments and Antiquities. The Ministry was expected to initiate appropriate action on these instructions for effective heritage management. The follow-up audit was undertaken to assess the extent of action taken on PAC's recommendations and concern areas reported by Audit.

Since the previous audit, Ministry/ASI had undertaken various new initiatives for heritage management *viz.* use of software for digitising antiquity collections in museums, launching of e-ticketing facility for visitors, launch of *Adarsh Smarak* initiative to provide necessary amenities at monuments, etc. The follow-up audit, however revealed that most of the recommendations of PAC *viz.* updation of relevant Act/Rules, preparation of Heritage Bye-Laws, requirement of an efficient governance system, digitisation of data of monuments and antiquities, financial management, etc. were yet to be complied by the Ministry/ASI. Further, specific recommendations of PAC *viz.* constitution of a co-ordination mechanism with the local government/ agencies, need for comprehensive survey of monuments, were not even conveyed to Circle offices for action. An analysis of recommendations made by PAC and compliance thereon by the Ministry/ASI is presented at **Annexe-11.1**.

A summary of focus areas discussed in this report and further recommendations made thereon are as under:

Chapter	Conclusions	Recommendations
	The first report of the PAC contained recommendations on 25 specific issues, of which 20 were accepted by the Ministry. Out of five remaining recommendations, PAC, in its second report, made further recommendations on four issues and decided not to pursue the remaining one. However, action on most of these recommendations are yet to be completed even after six years of its recommendation.	Ministry/ASI is urged to ensure compliance of the recommendations of PAC with utmost urgency and priority.

3: Policy and Regulations	The recommendations made by PAC in 2016 were essential for effective heritage management. However, it was noticed that in most cases, despite the passage of time, the exercise to carry out necessary amendment/notification on policy related areas of concern discussed by the PAC was still in process.	The Ministry/ASI needs to immediately evolve a comprehensive strategy to ensure time-bound amendment in the relevant Acts/Rules. It may also expedite preparation of Heritage Bye-Law for all protected monuments to minimise and prevent encroachment.
	There was substantial delay in preparation of Heritage Bye-Laws to regulate construction related activities in prohibited/regulated areas of the monument despite constitution of National Monument Authority (NMA) in 2011. The significant delay in timely preparation of Bye-Laws is indicative of gross laxity on the part of Ministry/ASI with resultant growth in incidents of encroachment.	
4: Governance and Infrastructure	Certain areas of urgent concern *viz.* requirement of strategy/road-map for heritage conservation, reconstitution of Central Advisory Board of Archaeology, filling up of vacancies on priority, existence of a monitoring and grievance redressal system etc. needs to be addressed by the Ministry/ASI for improved working environment for heritage management.	Ministry/ASI must take immediate steps to address the PAC recommendations on issues related to Governance and Infrastructure to ensure effective heritage management. The Central Advisory Board of Archaeology and Coordination Committees for dealing with cases of encroachment should be constituted forthwith without delay.
	Severe constraints related to governance, human resources and working of various subordinate offices of ASI, which has also been pointed out by PAC, hinder its operation.	
5: Financial Management	Despite assurance to PAC, ASI's expenditure on excavation and exploration activities was still below one per cent. This was in sharp contrast to Ministry's stated position in its Action Taken Report to PAC earlier.	ASI needs a robust and transparent financial management system. It must increase expenditure on excavation and exploration activities and

	Funds available with National Culture Fund have been accumulating over the years and not being utilised for its objectives. Time bound finalisation of Heritage Bye-Laws for all monuments was also important in efficient execution of PPP mechanism in heritage management.	make efforts to rope in more Corporates and high net-worth individuals into funding conservation and visitor's amenities as recommended by the PAC and in convergence with Tourism Policy. Specific guidelines also need to be framed for categorization of monuments as ticketed/ non-ticketed as the absence thereof may adversely impact revenue.
	Despite recommendation of PAC for categorisation of a monument as ticketed/non-ticketed, amount of fees to be levied/shared, issue of notification, etc., there was lack of clear guidelines on these aspects.	
6: Identification and Notification of Monuments and Antiquities	Work regarding preparation of centralised and digitised database of monuments and antiquities was lagging even after 14 years of establishment of National Mission on Monuments and Antiquities.	Issues related to documentation & digitisation of monuments and antiquities, categorisation and notification of monuments must be immediately addressed by the Ministry as a part of a comprehensive strategy for heritage management. It should review the process of identifying a certain monument as of national importance and revisit their notifications and other documents for ASI's ownership. Antiquities identified as monuments need to be declared as movable or immovable through notification.
	Despite pointing out in previous Audit Report and PAC recommendations thereon, issues related to monuments of national importance *viz.* criteria and process for their selection, preparation of inventory of all protected monuments for public display, categorization of monuments, rectification of discrepancies in the list of monuments, their notification and de-notification, etc., have not been resolved.	
7: Monument management	Joint physical inspection of selected monuments, revealed that in most of the monuments, concerns regarding management of monuments including provision of visitors' facilities,	Increase in encroached monuments noticed during the present audit compared to findings of previous audit indicated poor and

	conservation works, security etc. remained unaddressed despite specific recommendations on maintenance of Baolis, Living and other monuments by PAC.	unenthusiastic response mechanism of Ministry/ASI towards neglect, damage, loss/theft, encroachment etc. of monuments and antiquities. Concerns related to Monument management need to be urgently addressed by the Ministry.
8: Antiquities Management	In the national level museums and site-museums under the Ministry/ASI, issues related to management of antiquities *viz*. shortage of staff, lack of digitisation and accession of artefacts, their display, verification, conservation, storage and security were still existing. These concerns already pointed out in the previous Audit Report and PAC report were affecting the effective working of these museums.	A secure centralised storage facility needs to be created for safe custody, upkeep and maintenance of artefacts with computerised database system for their proper management. Concerns in the functioning of national level museums and site-museums under the Ministry/ASI reported in the present Audit Report have not been addressed despite having been pointed out in the previous Audit Report should be taken on priority basis.
9: Exploration and Excavation	Issues connected with exploration and excavation activities *viz*. non-existence of action plan, absence of centralized information and monitoring mechanism for excavation activities, delay in report writing work, sufficient budget allocation etc. as pointed out in previous Audit Report and also discussed by PAC have not been resolved.	The approach of the Ministry/ASI to ensure an effective system to resolve issues related with exploration and excavation has been found grossly wanting. Ministry/ASI is recommended to deploy its resources and funds expeditiously for exploration and excavation activities.
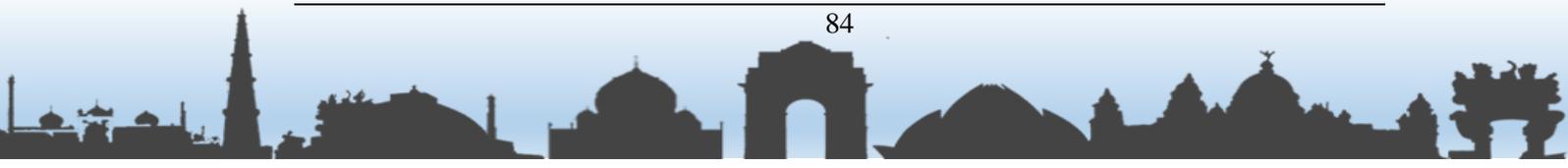
PAC in its second report (December 2018), had shown concern over delay on the part of the Ministry in responding to suggestions made in its first report (April 2016). Further, PAC was appalled to note the tepid response of the Ministry in furnishing Action Taken Notes and that even after two and a half years, action on its recommendations was stated by the Ministry as under process. During the follow-up audit, Ministry/ASI had assured (January 2022) timely action on most of these still delayed issues. In order to bring about a holistic change in heritage management, it would be important that the Ministry/ASI take stock of its performance on all the previous/present recommendations, and ensure accountability of individuals/units responsible for previous failures and ensure time-bound action to avoid such lapses.

New Delhi
Dated: 31-03-2022

(PRAVIR PANDEY)
Director General of Audit
(Home, Education & Skill Development)

Countersigned

New Delhi
Dated: 31-03-2022

(GIRISH CHANDRA MURMU)
Comptroller and Auditor General of India

ANNEXES

Annexe 2.1
(*Refer Para 2.3*)
Selection of Centrally Protected Monuments for joint physical inspection

States/Category	Circles covered	World Heritage Sites under ASI	Adarsh and Ticketing Monuments	Monuments reported traced or affected due to urbanisation/ submerging	Monuments reported encroached upon	Other sites/ monuments (including non-ticketed)	Total	Site Museums covered
Selection*		100%	100%	25%	30%	12%		
Delhi	1	3	6	3	6	10	**28**	**5**
Haryana	1	0	3	0	2	5	**10**	**1**
Karnataka	3	2	8	1	6	28	**45**	**6**
Madhya Pradesh	2	3	6	0	1	13	**23**	**5**
Maharashtra	2	3	4	2	7	10	**26**	**0**
Odisha	1	1	4	0	11	4	**20**	**3**
West Bengal	2[1]	0	5	6	2	19	**32**	**3**
Total selection	**12**	**12**	**36**	**12**	**35**	**89**	**184**	**23**

Selection percentage was (minimum) in respect of monuments available in the specific category in each of the selected States

1. Other sites/monuments include those monuments which were not covered in other categories but were commented upon in the earlier Report.
2. Based on preliminary findings/report, additional monument/sites were inspected and commented in this Report.
3. Under three World Heritage Sites in Madhya Pradesh, 26 monuments have been covered.

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[1] In August 2020, the Ministry had announced creation of seven new Circles including 'Raiganj' in West Bengal. Though some monuments earlier under the jurisdiction of Kolkata Circle shifted to Raiganj Circle these have still been addressed in the report as under ASI Kolkata Circle.

Annexe 5.1
(Refer Para 5.2.1)
Financial irregularities in ASI

State	Circle/ Division	Remarks
Delhi	**Delhi Circle**	✓ For some Sub-Circles, while inviting tenders for providing housekeeping services at the monuments, specific clause *i.e. experience required in providing manpower <u>at heritage sites</u>* was inserted. As a result, in seven cases, only two agencies participated in the bidding process of which only one qualified for financial bidding. There was lack of competition in the process of awarding contract for housekeeping works at the ASI monuments. ✓ The Circle was awarding housekeeping contracts for monuments (i) where there was agreement with other agency for providing daily maintenance service (*Agarsen ki Baoli*), (ii) which have been fully encroached, were not under the administrative control of ASI and it had initiated their de-notification process (*Sarai Sahji, Rajpur* Cemetery*, D'Eremao* Cemetery), (iii) which were inside area controlled by other agency and their daily maintenance by ASI was not possible (*Sunderwala Mahal, Bada Batasha, Lakkarwala* Tomb*, Sunder Burz* – all inside *Sunder* Nursery). Audit estimated that during the period from April 2015 to October 2020 an expenditure of ₹ one crore was incurred by ASI in providing daily housekeeping services at these monuments. ✓ The scope of work awarded (September 2018) for the housekeeping work at *Kotla Feroz Shah* included jungle cleaning, uprooting of rank vegetation, grass, trees, bushes from wall, pathway, removing vegetation including their dumping, etc. It was noted that despite inclusion in the scope of work awarded, Circle awarded the same work to another agency, thereby causing loss of revenue of ₹ 0.57 lakh.
Delhi	**Horticulture Division**	✓ Irregularities in awarding and finalising contracts for maintenance of archaeological gardens *viz.* error in calculation, receipt and finalisation of bids after last date of their submission, award of contract for more area, incorrect estimation of area and required manpower, etc. were noticed in the Division. Also, against their annual approval, works were being awarded on monthly basis to cartel of selected bidders.
Haryana	**Chandigarh Circle**	✓ Circle had incurred an expenditure of ₹ 1.65 crore for appointing 65 number of MTS during 2016-2020, in excess of their sanctioned strength of 71. ✓ Receipts on account of ticket sale were deposited in the government account after delays ranging from 19 to 59 days.
Madhya Pradesh	**Bhopal Circle, Jabalpur Circle**	✓ Labour cess amounting to ₹ 1.33 lakh on account of construction work was not recovered. In this regard, Bhopal Circle stated that it was not aware of the provision.

State	Circle/ Division	Remarks
		✓ In Bhopal Circle, construction material amounting to ₹ 11.29 lakh obtained in June 2019 had deteriorated (not useful for the work) due to non-finalisation of labour related tender (June 2021). ✓ Despite being pointed out in the earlier report, chemical worth ₹ 3.66 lakh purchased during 2005-09 was not utilised, of which chemical worth ₹ 2.14 lakh expired before it could be used.
Maharashtra	**Aurangabad Circle, Mumbai Circle**	✓ During the period from 2014-15 to 2019-20, labour cess amounting to ₹ 57.49 lakh (@ One *per cent* of the conservation and maintenance work) was not levied. In this regard, Mumbai Circle stated that due to scarcity of manpower and ignorance of rules, cess was not collected. ✓ Receipts on account of ticket sale were deposited in the government account after delays ranging from 3 to 122 days.
Odisha	**Bhubaneswar Circle**	✓ During the period from 2013-14 to 2019-20, labour cess amounting to ₹ 52.70 lakh (@ one *per cent* of the conservation and maintenance work) was not levied. In this regard, Bhubaneswar Circle stated that concerned official had been asked to follow the rules from forthcoming estimates. ✓ In the Circle, despite completion of works, advances amounting to ₹ 1.14 crore and paid to various parties were not adjusted for period ranging from three to seven years. The Circle office intimated that the matter had been reviewed and the outstanding advance would be adjusted. ✓ Receipts on account of ticket sale were deposited in the government account after delays ranging upto 250 days.
West Bengal	**Kolkata Circle**	✓ Receipts on account of ticket sale were deposited in the government account after delays ranging from 10 to 55 days.

Annexe 5.2
(*Refer Para 5.3*)
Revision of entry fees (in ₹)

	For Indian citizens, citizens of SAARC and BIMSTEC countries[2] and overseas citizens of India			For other foreign visitors		
	Before 01.04.2016	**After 01.04.2016**	**Since 01.08.2018**	**Before 01.04.2016**	**After 01.04.2016**	**Since 01.08.2018**
World Heritage Sites	10	30	40	250	500	600
Other ticketed Monuments	5	15	25	100	200	300

Since August 2018, following provisions were added:

1. At Red Fort, Delhi, charges from Indian Citizens, etc. are ₹ 50 per head and for cashless payment ₹ 35 per head.

2. At Taj group of monuments, Agra Fort, Fatehpur Sikri, Humayun's Tomb and Qutub Minar charges from Indian Citizens, etc. for cashless payment are ₹ 35 per head.

3. At Taj group of monuments, Agra Fort, Fatehpur Sikri, Humayun's Tomb, Red Fort and Qutub Minar charges from foreign visitors for cashless payment are ₹ 550 per head. Additional charges have been prescribed for foreign visitors desirous of availing additional facilities - (₹ 850 per head and ₹ 800 per head for cashless payment).

4. Another ₹ 200 per head (for all categories of visitors) charged for entry to main mausoleum of Taj Mahal- since December 2018

5. At Akbar's Tomb, Mariam's Tomb, Itimad-ul-Daul's Tomb, Rambagh and Mehtab Bagh (all in Agra), *Jantar Mantar*, *Khan-i-khana*, *Purana Quila*, Tughlaqabad Fort, Kotla Ferozshah, Safdarjung Tomb (all in Delhi) charges from Indian Citizens, etc. for cashless payment are ₹ 20 per head.

6. At Akbar's Tomb, Mariam's Tomb, Itimad-ul-Daul's Tomb, Rambagh and Mehtab Bagh (all in Agra), *Jantar Mantar, Khan-i-khana, Purana Quila*, Tughlaqabad Fort, Kotla Ferozshah, Safdarjung Tomb (all in Delhi) charges from foreign visitors for cashless payment are ₹ 250 per head. Additional charges have been prescribed for foreign visitors desirous of availing additional facilities - (₹ 400 per head and ₹ 350 per head for cashless payment).

After 1 April 2016, charges for film shooting by professional and other agencies have also been increased from ₹ 5,000 per day (for all types of monuments) to ₹ one lakh per day for World Heritage Sites and ₹ 50,000 per day for other monuments.

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[2] SAARC countries include–Afghanistan, Bangladesh, Bhutan, Maldives, Nepal, Pakistan and Sri Lanka. BIMSTEC countries include–Bangladesh, Bhutan, Myanmar, Nepal, Sri Lanka and Thailand

Annexe 6.1
(*Refer Para 6.3.1*)
Anomalies in the list of CPM due to absence of notification criteria

State	Circle	Monument details	
a.1 Instances where more than one monuments located in the same complex were notified as separate monument			
		Complex	**Monuments**
Delhi	Delhi	Roshanara Bagh Complex	2
		Qudsia Garden Complex	2
Bihar	Patna	Barabar & Nagarjun Hills	7
		Kurisaria	5
		Ancient Structure, Rajgir,Nalanda	3
		Maner, Patna	4
Karnataka	Dharwad	Mallikarjuna Temple Complex, Bagalkot	3
		Kontigudi, Bagalkot	2
Odisha	Bhubaneswar	Gangadharaswamy temple, Jagadisvaraswamy temple	2
Uttarakhand	Dehradun	Jageshwar Temple Complex, Almora	6
a.2 Instances where all structures within a complex were notified as single monument			
		Monument	
Delhi	Delhi	Red Fort	
		Qutub Complex	
Karnataka	Hampi	Bidar Fort	
b. Instances where part of the monument was not declared protected			
		Name of protected monuments	**Area not defined as protected**
Delhi	Delhi	City wall of Shahajahanabad, Darya Ganj	Some portion of the wall across the road was left as unprotected.
Karnataka	Dharwad	Basadis at Chandragiri Hills, Sravanabelagola	Out of 14 basadis, 11 were not declared as protected and were left unprotected.
Remarks: In the earlier Report, the Ministry was unable to provide any documented reasons in support of its reply (part b above) for categorisation adopted in such cases.			
c. Instances where some *Kos-Minars* were protected by State Archaeology Department In Delhi Circle ASI was protecting one *Kos-Minar* (inside Delhi Zoo) whereas three were protected by State Archaeology Department of Delhi Government (located at Badarpur).			

Note: As pointed out in earlier Report

Annexe 6.2
(*Refer Para 6.2 and 6.3.4*)
Discrepancies in the list of Centrally Protected Monuments

State	Circle	Monument	
a. Cases where same monument was notified twice			
Delhi	Delhi	Iron Hindu Pillar was also included in the monuments notified under Qutub complex	
		Hauz Shamsi also notified as Shamsi Talab	
b. Monuments where final notification was not issued (as reported earlier)			
Andhra Pradesh	Hyderabad	Ancient Site at Puslapadu, District Prakasam	
Kerala	Thrissur	Shiva temple, Thiruvanchikulam	
Madhya Pradesh	Bhopal	Kamlapati Mahal and adjoining areas, Bhopal	
		Painted rock shelters, two Buddhist stupas and other remains, Sehore	
	Jabalpur	*Ladaki-ka-Tila*, Katni	
		The site of Kankalidevi temple including the Devi temple and ruined temple close to them, Katni	
Tripura	Aizwal	Ancient mound called Shyam Sunder Till	
		Pujakhola, Tripura	
Uttar Pradesh	Sarnath	Long mound, Distt. Chandauli, Uttar Pradesh	
		Large rectangular shape mound, Distt Chandauli, Uttar Pradesh	
		Small conical mound of ruins called Devi-ka-Sthan, Distt. Chandauli, Uttar Pradesh	
		Ancient Buddhist site known as Chaukhandi Stupa, Distt. Varanasi, Uttar Pradesh	
West Bengal	Kolkata	St Johns' Church *The Circle office accepted that the final notification regarding declaring the monument as of nation importance was not available with it.*	
c. Monuments protected by both Centre and State			
Andhra Pradesh	Amaravati	Fort in ruins, Dharanikota	Notified both by ASI and State Department. In the earlier Report, ASI had stated that the State Department would be requested to delete these monuments from the State list.
		Bhimeswara temple at Samalkot, East Godavari District	
Uttar Pradesh	Sarnath	Stone group of a gigantic lion standing on a small elephant	Also included in the protected list of State Archaeology Department, Uttar Pradesh.
d. Instances of Antiquities protected as Monuments			
Assam	Guwahati	Eight Canons of the Ahom period on the bank of the Sibsagar tank, Sibsagar	
		Gun of Emperor Sher Shah, Sadiya	
		Two Swivel guns belonging to the Mughal Nawwara, Sadiya	
Chhattisgarh	Raipur	Ganesh statues, Barsur, Dantewada	
Karnataka	Dharwad	All old guns on ramparts and in trophy, Vijaypura	
Maharashtra	Mumbai	Mahadev Stones, Sholapur	
		Carved Stones, Palghar	
Odisha	Bhubaneswar	Three Colossal Matrikas, Jajpur	
		Three Buddha sculptures, Jajpur	
Rajasthan	Jaipur	Looted guns, Bharatpur	
		Marble Jhoola, Bharatpur	

State	Circle	Monument
Tamil Nadu	Chennai	The Cannon, Vellore
Uttar Pradesh	Jhansi	Five life sized elephant statues, Mahoba
	Sarnath	Stone group of a gigantic lion standing on a small elephant. It is lying on Akbar's bridge
West Bengal	Kolkata	Dalmadal gun and the platform on which it is mounted
		Jahan kosa gun, Murshidabad
	Reply of the Circle that the two monuments were being protected prior to the passing of AMASR Act, 1958 was not tenable since ASI/Circle had not initiated any action for their de-notification.	
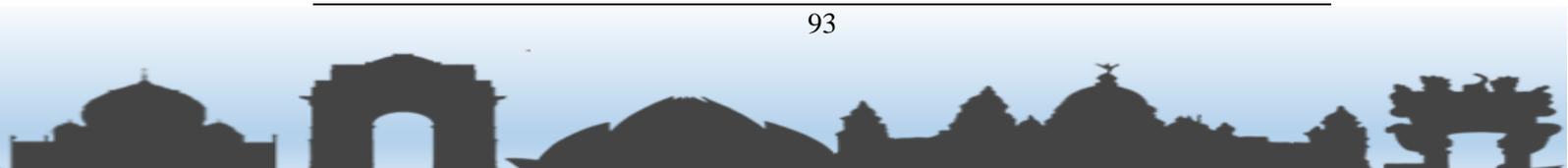
Annexe 6.3
(Refer Para 6.3.5)
Monuments not de-notified by ASI

State	Circle	Monuments reported by ASI		
		As still missing (24)	As affected due to urbanisation (14)	As submerged under reservoir (12)
Andhra Pradesh	Amaravati		Ancient Buddhist remains and Brahmi Inscriptions on the monuments	Hills of Nagarjunakonda with the ancient remains, Sculptures, carvings, images on the ancient mound, Naguavaram
Arunachal Pradesh	Guwahati	The ruins of copper temple, Paya, Lohit		
Assam	Guwahati	Guns of Emperor Sher Shah, Sadia		
Delhi	Delhi	Bara Khamba Cemetery, Delhi Inchla Wali Gumti, Mubarakpur Kotla,	Mound known as Jogabai Pool Chadar Alipur Cemetery **Tomb of Capt. Mc Barnett and others,** Site of siege battery bearing the inscription, Site of siege battery, Major Edward Kaye, Site of siege battery at Quadasia Mosque garden (2)	
Gujarat	Rajkot		Ancient Site, Sejakpur, Historic Site No. 431-435 Vadodara	
Haryana	Chandigarh	*Kos Minar*, Mujesar, Faridabad, *Kos Minar*, Shahabad, Kurukshetra		
Jammu & Kashmir	Srinagar			Rock carving of Sitala, Narda, Brahma and Radha Krishan, Kathua, Rock carving of Devi riding a lion, Kathua, Visveswara and other cave temples, Kathua
Karnataka	Bangalore		**Pre-historic site, Chikkajala** **Pre-historic site, Hejjala**	**Pre-historic site, Kittur**
Madhya Pradesh	Jabalpur	Rock Inscription, Satna		
Maharashtra	Mumbai	Old European Tomb, Pune, One Buruj, Agarkot		
Rajasthan	Jaipur	Inscription in Fort, Nagar, Tonk, 12th Century Temple Baran		

State	Circle	Monuments reported by ASI			
		As still missing (24)	As affected due to urbanisation (14)	As submerged under reservoir (12)	
Uttarakhand	Dehradun	Kutumbari Temple, Dwarahat, Almora			
Uttar Pradesh	Sarnath, Lucknow, Jhansi	Ruins of three small linga temple circle 1000 AD, Ahugi, Mirzapur, Three sites with megaliths on the western and north eastern toes of the hills, Chandauli, Tablet on treasury building, Varanasi, Telia Nala Buddhist ruins, Varanasi, A Banyan grove containing traces of ancient building Amavey, Balia, Closed cemetery, Katra Naka, Banda Gunner Burkill's Tomb, Mehroni, Lalitpur, Three Tomb, Lucknow-Faizabad Road, Cemeteries at miles 6 & 7, Jahraila Road, Lucknow, Cemetery at Gaughat, Lucknow, Large ruins site called Sandi-Khera, Pali, Shahbad, Hardoi	Cemetery (Bus Stand), Jalaun		
West Bengal	Kolkata, Raiganj	Ruins of fort, Bamanpurkur, Nadia		**A mound and a statue of Surya, Pareshnath, A mound with a Jain statue, Pareshnath, Image of Durga slaying Mahishasura under a tree, Sarengarh, Bankura, Temple site now represented only by a mound, Sarengarh, Bankura, A mound with an image of Nandi on it, Sarengarh, Bankura, A mound with statues of Ganesh and Nandi on it, Sarengarh, Bankura,**	

Note: 'In Bold letters- not found existing during joint physical inspection

Annexe 7.1
(*Refer Para 7.1.1, 7.1.2, 7.1.3 and 7.3*)
Results of Joint Physical Inspection of Monuments

	Description	State	Circle	No. of Monuments		Photographs and descriptions
				WHS	*Adarsh and Ticketed*	
Available at World Heritage Site, *Adarsh* and Ticketed monument	**Public amenities** (one or more) *viz.* drinking water, toilet block, facility for physically challenged not available at	Delhi	Delhi	--	4	Toilet Block at Tughlakabad Fort, Delhi Circle was not working due to water supply problem. ASI in October 2021 had asked DDA for water supply.
		Haryana	Chandigarh	--	3	
		Karnataka	Bengaluru, Dharwad, Hampi	--	4	
		Madhya Pradesh	Bhopal, Jabalpur	2#	1	
		Maharashtra	Aurangabad, Mumbai	--	2	
		Odisha	Bhubaneswar	1	1	
		West Bengal	Kolkata, Raiganj		4	
	Tourist facilities (one or more) *viz.* cloak room, Wi-Fi, parking, pathways, guide, interpreter, audio guide services, publicity material not available at	Delhi	Delhi	3	6	Damaged QR code scanner at Sultan Garhi, Delhi Circle also declared as 'worst' ticketed monument.
		Haryana	Chandigarh	--	3	
		Karnataka	Bengaluru, Dharwad, Hampi	2*	6	
		Madhya Pradesh	Bhopal, Jabalpur	3	4	
		Maharashtra	Aurangabad, Mumbai	3	3	
		Odisha	Bhubaneswar	1	1	
		West Bengal	Kolkata, Raiganj		6	
All monuments	Monument attendant, Cultural and Protection Signage, Site-map, Security Guard and Security Equipment (not available at one or more), monument or its part closed for public	Delhi	Delhi	16		Monument Bibi Sahib's Masjid, Bhopal Circle was closed for visitors without the approval of DGASI, since 1970-72. Circle office, intimated that an enquiry followed by appropriate action would be initiated in this regard.
		Haryana	Chandigarh	2		
		Karnataka	Bengaluru, Dharwad, Hampi	5		
		Madhya Pradesh	Bhopal, Jabalpur	22		
		Maharashtra	Aurangabad, Mumbai	4		
		Odisha	Bhubaneswar	18		
		West Bengal	Kolkata, Raiganj	17		
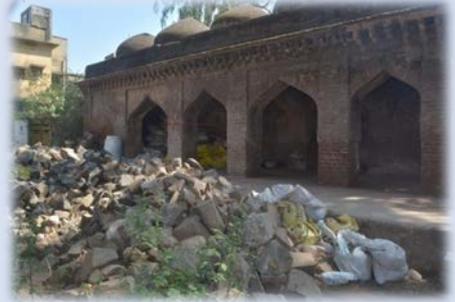
Note: Some monuments in Raiganj Circle (earlier under Kolkata Circle) are located in Sikkim
*=Group of nine monuments, Hampi and one at pattadakal
#=include group of monuments at Khajuraho

Annexe 7.2
(*Refer Para 7.2.2*)
Improper conservation and unauthorised encroachments/constructions at Monuments

Circle	Photographs and descriptions	
Delhi	**Out of 25 monuments (excluding three missing), cases of big cracks (11), plaster coming off (15), seepage (3) and requiring chemical treatment (5) were noticed.**	
	Pump room was constructed at the monument - *Purana Quila*	Corridor covered to create rooms at the monument - Safdarjung Tomb
	False ceiling created at the monument - *Rang Mahal* in Red Fort	Lift provision was being provided at the colonial era building in Red Fort
Aurangabad, Mumbai	**Out of 27 monuments, cases of big cracks (6), plaster coming off (6), seepage (9) and requiring chemical treatment (13) were noticed.**	
	Dilapidated condition of Dominican Church and Convent Agarkot	Modern tiles flooring in Siddheshwar Mahadev, Toka
	Unauthorised construction by Maharashtra Tourism Development Corporation at Ajanta	Encroachment in Ghrishneshwar Temple
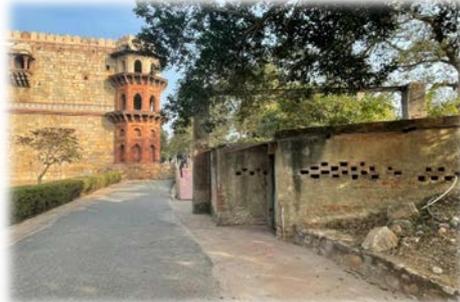
Circle	Photographs and descriptions
Chandigarh	**Out of 10 monuments, cases of big cracks (8), plaster coming off (6), seepage (5) and requiring chemical treatment (8) were noticed.** Unauthorised construction at monument–Ala Vardi Khan Mosque, Gurugram, Haryana
Bhopal, Jabalpur	**Out of 46 monuments, cases of big cracks (12), plaster coming off (10), seepage (11) and requiring chemical treatment (31) were noticed.** Black stains on the outer wall of monument-Sas-Bahu Temple, Gwalior Fort / Big cracks in monument Teli ka Mandir, Gwalior Fort Electrical equipment and photos at monument-Shantinath Temple, Khajuraho / Antiquities lying in the open at monument – Bhojshala, Dhar
Kolkata, Raiganj	**Out of 26 monuments (excluding six submerged), cases of big cracks (8), plaster coming off (8), seepage (6) and requiring chemical treatment (2) were noticed.** Dilapidated conditions of monuments - Tamluk Rajbati and Clive House

Circle	Photographs and descriptions	
	New constructions carried out in protected area of monument-Dubdi Monastery	Patch work not symmetrical to the original work carried out at Currency Building
Bengaluru, Dharwad, Hampi	**Out of 45 monuments (including one missing), cases of big cracks (16), plaster coming off (13), seepage (16) and requiring chemical treatment (30) were noticed.**	
	Defaced ceiling at Dariya Daulat Bagh, Mysuru after four years of chemical conservation	Abandoned chain pulley system, Old Shiva Temple, Hampi
	Modern bricks and cement used, Chitradurga	Changes made at Bidar Fort, Bidar for ASI office
	In respect of Saraswathi Temple and under-ground Shiva Temple (Hampi Circle), despite assurance given by ASI regarding necessary action to address the issues reported in previous Report, ASI had not incurred any conservation expenditure on these monuments during the period from 2015 to 2020.	
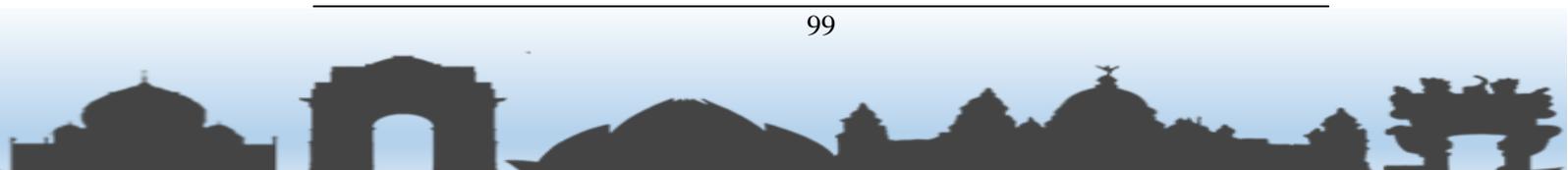
Circle	Photographs and descriptions
Bhubaneswar	**Out of 20 monuments, cases of seepage (17) and requiring chemical treatment (20) were noticed.**
	Unauthorised construction at encroachment at Sun Temple, Konark
	Hotel constructed in the protected area of monument-khandagiri caves, Bhubaneswar
	Antiquities lying exposed to climate at Buddhist site, Ratnagiri

Annexe 7.3
(*Refer Para 7.2.3*)
Improper management of gardens/excess growth of vegetation at monuments

Circle	Photographs and descriptions	
Delhi	Garden waste not being picked (for one year) at monument – *Jantar Mantar*	Unchecked vegetation growth at monument – *Nai ka Kot*
Aurangabad, Mumbai	Excess vegetation in Janjira Fort, Murud and in Dominican Church Agarkot	
Kolkata, Raiganj	Excessive vegetation growth at monument- Barkona Deul and Nilkunthi Mounds	
Bengaluru, Dharwad, Hampi	Thick vegetation at Dariya Daulat Bagh, Mysuru	Thick vegetation around the fort, Gulbarga
Bhubaneswar	Horticulture godown in protected area of monument- Brahmeswar Temple, Bhubaneswar	Non-maintenance of garden at Trilochaneswar Temple, Jajpur
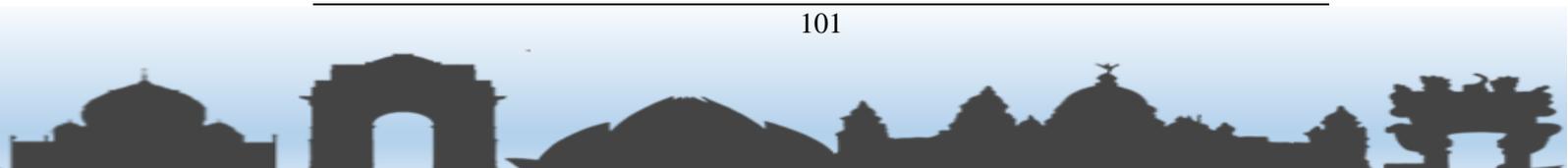
Annexe 8.1
(Refer Para 8.1)
Handing/taking over, verification and missing artefacts in National Museum

Section	Number of artefacts reported by		Remarks (Status noticed during follow-up audit)
	Varadarajan **Committee**	*Yechury* **Committee**	
Anthropology	10,552	9,480	Intimated that out of 9,452 objects, 8,952 were handed/taken over and remaining 501 were missing/untraceable.
Archaeology	9,414	9,650	Reported 9,655 objects of which 9,416 were physically verified (in December 2018) and 241 loaned/transferred.
Arms & Armours	6,457	6,722	Reported 6,457 objects were physically verified in October 2018.
Central Asian Antiquities	12,382	12,382	Reported 12,382 objects of which 125 were on display.
Decorative Arts	9,415	9,444	Reported 9,433 objects of which 9,358 physically verified/taken over (June 2019). Some objects *viz. Golkunda Rumal, Bidri Pandan, Ganjifa card,* Metallic Peacock, ivory flag reported missing. 125 objects were on display
Jewellery	535	569	Reported 535 objects.
Pre-History	5,437	5,437	Curator reported taking over of only 1,943 objects (1,296 + 35 in gallery and 612 in reserve) and had no information on whereabouts of the remaining artefacts.
Manuscripts	14,160	14,143	Reported 14,143 objects. However, against the *Yechury* Committee report, out of 8,718 (Persian & Arabic) and 5,452 (Sanskrit) manuscripts, only 7,814 (Persian & Arabic) and 1,458 (Sanskrit) have been physically verified (December 2020).
Numismatic & Epigraphy	1,19,791	1,19,926	Reported only 12,744 objects as physically verified/handed/taken over.
Paintings	16,135	16,323	Curator reported that only 2,959 paintings have been verified and taken over. The process of physical handing over of artefacts started in August 2019 was pending (March 2021).
Pre-Columbian & Western Art	2,435	2,909	Reported only 1,205 objects (physically verified in 2011) of which three were missing.
Total	**2,06,713**	**2,06,985**	

Annexe 8.2
(Refer Para 8.1)
Conservation and display status of artefacts at various museums

National Museum, Delhi

Pic 1-vehicles parked alongwith artefacts endangering their safety, Pic-2-garbage dumped in front of statues, Pic 3-construction material kept with the statues, Pic-4,5-artefacts lying neglected in basement and other parts of museum (epigraphy gallery), Pic 6,7-work being undertaken without ensuring safety of art objects.

Indian Museum, Kolkata

| Artefacts wrapped in plastic and placed one upon another | Artefacts wrapped in plastic and placed one upon another |

Cement and other materials used on artefacts for fixing with wall/pedestal

Asiatic Society, Kolkata
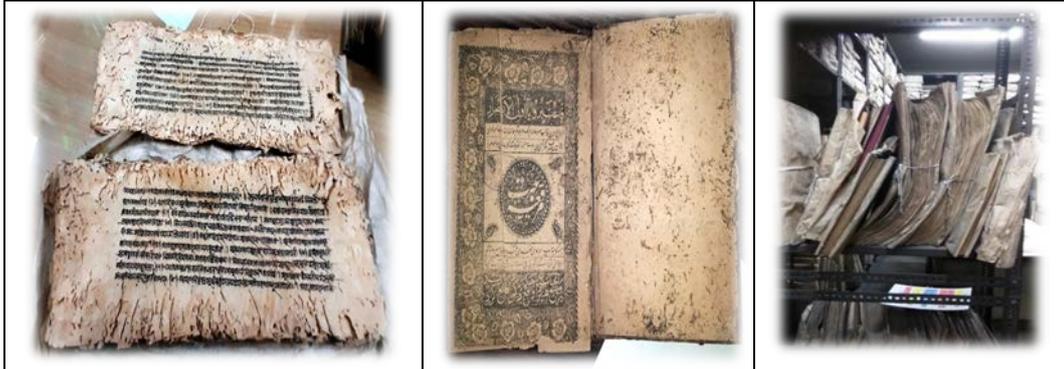
| Manuscript requiring restoration | Rare book in brittle condition | Lithoplates stacked |

Annexe 8.3
(Refer Para 8.1.3)
Physical verification certificates in Salarjung Museum, Hyderabad

Certificates issued without date and name of the verifying authority for different number of art objects in each year (against available 46,216) and with same typography mistakes.

Annexe 11.1
(Chapter 11)
Compliance position of recommendations made by PAC

| S. No.	Issue	Observations and Recommendations of the PAC in 39 Report of 2015-16	Response of the Ministry/ PAC	Observation (paragraph no. in parenthesis) Reply received from Ministry/ASI (January 2022) included at the respective paragraphs
1	National Conservation Policy	Notify the rules under the Policy to streamline notification and de-notification of monuments and the conservation activities under the new policy within three months.	Accepted	No such document/rule notified by ASI (3.1). De-notification of monuments declared as not traceable was pending (6.3.5). Important instructions included in the Policy were not being followed (7.2.1).
2	Exploration and Excavation Policy	Expedite the final notification and drawing up of action plan under the National Policy on Archaeological Excavations and Explorations. Ensure adequate allocation of funds and its effective utilisation in exploration and excavation.	Accepted	The Excavation and Exploration Policy approved by Hon'ble Minister was not notified (3.1). There was no action plan based on excavation policy and ASI's expenditure on the activity was still less than one *per cent* of its total expenditure (9.2 and 5.1.1).
3	Acquisition of Antiquities and Art Treasures	PAC had shown serious concern and displeasure on delay in carrying out amendment in AAT Act and had asked to expedite the finalisation of the draft started in 1997. It asked the Ministry to explore and intimate within three months necessary steps taken to recover or procure antiquities which are of cultural value but have been sold abroad.	Accepted	The exercise was still in process (3.1). However, the Ministry had made progress in recovering the artefacts (6.4).
4	Management of Living Monuments	Progress made in signing MoU with management of living monuments to be appraised. Enhance efforts in conservation and protection of ancient monuments, rock edicts needed.	Accepted	ASI did not have the details of those monuments where prayers/worships were started after the issue of notification. It was unable to provide the details of MoU entered into with management of living monuments (7.1.3.1).
5	Uniform procedure for Archaeological Museums under the Ministry	Finalised comprehensive policy guidelines for management of antiquities owned by ASI (through site museums) addressing issues raised by audit *viz.* acquisition, accession register, rotation, etc. National register of CPM and antiquities also to be prepared.	Accepted	A comprehensive guidelines addressing all issues pertaining to antiquities owned by ASI was not prepared. Further, there was no uniform procedure for museums under the control of the Ministry (3.1 and 6.4).

S. No.	Issue	Observations and Recommendations of the PAC in 39 Report of 2015-16	Response of the Ministry/ PAC	Observation (paragraph no. in parenthesis) *Reply received from Ministry/ASI (January 2022) included at the respective paragraphs*
6	Shortage of Manpower and Restructuring	Issue of cadre restructuring process in ASI was to be taken up with Ministry of Finance to overcome the shortage of manpower.	Further recommendat ions made by PAC in its second report	Some progress in restructuring process of ASI was noticed as approval for creation of additional 758 posts was issued by the Ministry of Finance in April 2021. However, overall vacancy position in ASI had further deteriorated (4.2).
7	Filling current vacancies	Ministry should make concerted effort to fill all vacant posts in ASI within six months.	Further recommendat ions made by PAC in its second report	
8	National Monument Authority	Ministry evolve an internal mechanism to set targets and monitor timelines for its various agencies and units in consultation and fill up the vacant posts.	Further recommendat ions made by PAC in its second report	Only five Heritage Bye-Laws covering 31 protected monuments have been notified while finalisation of 165 Heritage Bye-Laws was at different stages. Posts of Whole and Part Time Members were still vacant since March 2019 and January 2014 respectively (3.2).
9	Security and safeguard arrangements	ASI to constitute a co-ordination mechanism with representatives of respective State Governments at each circle to check the incidence of encroachments with the co-operation of District and Police authorities. Strengthen the manpower for security, advances in IT for enhancing security by developing a comprehensive security policy for all monuments and museums. All ASI monuments and museums to have public amenities.	Further recommendat ions made by PAC in its second report	The co-ordination mechanism was not found existing (4.1.4.1). ASI had entered into MoU with ISRO for web-based utility, which allows users to explore map based content prepared by ISRO. The Ministry had also brought out comprehensive security policy for museums under its control (7.3). Public amenities were being created at the monuments by declaring them as *Adarsh Smarak* (7.1.2).
10	Training and implementation of expert group's report	ASI should implement the new HRD policy to overcome shortage of trained personnel. Training institute in Red Fort with UNESCO recognition.	Accepted	The Ministry/ASI had the infrastructure for building capability towards its heritage activities. However, the posts have not been filled and the enrolment of students was short. It was expected that with the establishment of new Institute of Archaeology, gaps will be addressed (4.2.1).
11	Budgetary allocation	Demands for funds must be raised on the basis of actual projection for requirements of ASI. For this purpose ASI to carry out pre-budget planning.	Accepted	After 2017-18, growth in ASI's overall expenditure and its expenditure on heritage protection had remained moderate (5.1).
12	Revenue generation	Structured system for categorisation of monuments as ticketed and non-ticketed must be developed and a comprehensive review carried out to bring more monuments in ticketed category.	Accepted	Though ASI had brought more monuments under ticketed category and revised the entry charges, the criteria adopted was not transparent (5.3). However, amendment in AMASR Act for introducing a system of recording footfalls was still pending

| S. No.	Issue	Observations and Recommendations of the PAC in 39 Report of 2015-16	Response of the Ministry/ PAC	Observation (paragraph no. in parenthesis) *Reply received from Ministry/ASI (January 2022) included at the respective paragraphs*
		Ticket and other charges should be reviewed and suitably revised. Ministry/ASI to explore enhancing revenue generation through premium renting of well-known sites for social and family events with proper guidelines.		(5.3.1).
13	Non-budgetary funding	Coordination between ASI and NCF should be strengthened to rope in more corporate groups and individuals into funding conservation and visitor amenities at monument sites.	Accepted	The funds of NCF were not being used for heritage activities as its primary corpus of Rs. 19.50 crore increased to Rs. 56.71 crore by 2020-21. (5.1.2)
14	Identification criteria and survey	PAC noted that a comprehensive survey to identify monuments of national importance for placing such monuments in centrally protected category is overdue. It recommended that guidelines for determination of national importance of a monument be finalised at the earliest (within six months) and thereafter a comprehensive survey with target timeline should be conducted to identify the exact number of monuments of national importance that can be protected.	Accepted	Guidelines have not been framed and instances defining absence of criteria in notifying a certain monument were still existing (6.3.1). No comprehensive survey/review to identify monuments of national importance that can be protected or to identify those monuments which over the period had lost their significance and need to be shifted to States was undertaken by ASI (6.3.2).
15	Notification issues	ASI to conduct workshops for circle office personnel for effective preparation of proposals for notification. Finalisation of de-notification guidelines may be expedited. Action may be taken against Circles and officers found to be defaulting in preparation of inventories of monuments under them within a prescribed time-frame.	In view of reply by the Ministry, PAC decided that no further action was required	ASI had no defined procedure/schedule for reviewing/modifying the list of Centrally Protected Monuments (6.3.3).
16	Missing monuments	ASI to expedite the physical verification, condition and existence of the notified monuments. Committee felt that in the absence of reliable database of monuments, ASI was unable	Accepted	Centralised database/inventory of CPM displaying to the public all the recommended information was not available (6.2). Monuments accepted by ASI as non-traceable were not de-notified (6.3.5).

S. No.	Issue	Observations and Recommendations of the PAC in 39 Report of 2015-16	Response of the Ministry/ PAC	Observation (paragraph no. in parenthesis) *Reply received from Ministry/ASI (January 2022) included at the respective paragraphs*
		to fulfil its basic mandate effectively		
17	Process of notification	ASI/Ministry put in place a system of periodic review of old notifications to verify the physical existence. ASI/Ministry may consider issuing guidelines whereby Ancient monuments (predating say 1700 AD) and contemporary monuments that are 100 years old and are of national importance stand automatically protected.	Accepted	System of period review of old notification was not existing (6.3.3). Further, no such guidelines declaring 100 years old monuments as of national importance was found in existence.
18	Categorisation of monuments	The concept of categorisation of monuments was made in the absence of any provision for assessing footfalls at the monument. Committee asked for necessary modifications in AMASR Act to address lacunae regarding categorisation of monuments and put in place a system of recording footfalls in non-ticketed monuments	Accepted	The work of categorisation of monument was still in process (6.2.1). Amendment in AMASR Act for introducing a system of recording footfalls and categorisation of monuments was pending (3.1).
19	Encroachments and unauthorised activities	Committee recommended that ASI/Ministry should consider evolving clear guidelines on the use of protected monuments and ensure MoU are signed with users/occupants based on the said guidelines. ASI should have a laid down policy for notification of sites with contested ownership or encroachments and constitute a co-ordination body with representatives of respective State Governments at each circle to check incidents of encroachments with the co-operation of District and Police authorities.	Accepted	Efforts not found to have been made to enter into MoU with management of living monuments. The position of encroached monuments reported by ASI was found incorrect. There was absence of mechanism for period review of encroachment/unauthorized construction cases. Further, guidelines or policy document on living monuments was not prepared by ASI (7.1.3.1).
20	Use of monuments for other purposes	Use of parts of monuments for residence should be done away with and usage as offices by ASI or any agency should be discouraged. Ministry may expedite and finalise guidelines allowing cultural events in the CPM.	Accepted	During joint physical inspection, monument found still being used for other purposes (e.g. in Red Fort space occupied for various offices of ASI and security agencies) (7.1.1).

S. No.	Issue	Observations and Recommendations of the PAC in 39 Report of 2015-16	Response of the Ministry/ PAC	Observation (paragraph no. in parenthesis) *Reply received from Ministry/ASI (January 2022) included at the respective paragraphs*
21	Inventory of centrally protected monuments	Prepare an inventory of all CPM and display the same on portal within two years for the public to get various information viz. category, circle and State, location and distance from nearest city, historical and cultural significance, encroachment details, etc.	Accepted	ASI intimated that the data with respect to Gazette Notification for 3,150 monuments had been compiled. However, database/inventory of CPM displaying to the public all the recommended information was still not available (6.2).
22	Maritime Archaeology	Committee recommended a separate wing of ASI with relevant expertise specially tasked to bolster efforts in this direction. Setting up of maritime museums displaying antiquities and monuments of our great maritime past.	Accepted	In the related branch, in addition to shortage of manpower, there was no perspective plan or policy with ASI for taking underwater archaeology (9.1.2). Further, no such maritime museum was found opened by the Ministry/ASI (8.3.2).
23	Leveraging IT for preservation and promotion	Enhanced efforts must be made to fully leverage the advantages of IT in preserving perishable monuments and antiquities. Develop a roadmap for preserving historical and cultural monuments using electronic data and images. Earmark funds specifically for awareness, interpretation, etc.	Accepted	ASI had entered into agreement with ISRO for web-based content on its monuments (7.3). However, there was absence of strategy or road-map for heritage conservation. (4.1.2)
24	Maintenance of *Baolis* and other monuments	Committee recommended the ASI to strengthen its efforts in restoring monuments and works in collaboration with some of the pioneering private organisation active in the field.	Accepted	During the follow-up audit, position of fifteen *Baolis* under the jurisdiction of Delhi Circle was found deteriorated as out of 13 wet *Baolis*, 10 had become dirty. Further, issues in respect of *Agarsen Ki Baoli*, as mentioned in earlier Report, have not been resolved 7.1.3.2).
25	Restoration of damaged Monuments	The Committee issued instruction regarding restoration work of damaged monuments and preservation of removed parts for display.	Accepted	Though conservation of monuments is a continuous process, improper conservation works/changes made in the original structures, construction in the prohibited areas of the monument, etc. as noticed during physical inspection, have been included in the report.

Glossary

'Antiquity' includes any coin, sculpture, painting, epigraph or other work of art of craftsmanship; any article, object or thing detached from a building or cave which is of historical interest, or declared by the Central Government to be an antiquity, which has been in existence for not less than one hundred years.

'Chalcolithic' *i.e.* Chalco + lithic means copper + stone. This represent culture or period when copper tools as well as stone tools were used.

'Conservation' means the processes through which material, design and integrity of the monument is safeguarded in terms of its archaeological and architectural value, its historic significance and its cultural or intangible associations.

'*Kos-Minars*' are medieval infrastructure (pillars) constructed across the highways as an important part of travel and communication.

'Living Monument' means monument that was still in use for the purpose for which they were originally designed at the time of notification of the monument.

'Monument' includes any structure, erection or monument, or any tumulus or place of internment, or any cave, rock, sculpture, inscription or monolith, which was of historical, archaeological or artistic interest and which had been in existence for not less than one hundred years, and include-

    (i)   The remains of an ancient monument,
    (ii) The site of an ancient monument,
    (iii) Such portion of land adjoining the site of an ancient monument as may be required for fencing or covering in or otherwise preserving such monument, and
    (iv) The means of access to an convenient inspection of an ancient monument'

'Preservation' means maintaining the status quo of a monument including its setting thereby not allowing any changes, either through deliberate human interventions or due to action of natural agents of decay to its fabric or its immediate environment.

'Prohibited Area' means area of the protected monuments declared as of national importance and extending to a distance of 100 meters in all direction.

'Protected Area' means any ancient monument which is declared to be of national importance by or under the Act.

'Regulated Area' means area in respect of every ancient monuments and archaeological sites and remains declared as of national importance and extending to a distance of 200 meters in all direction. The distance could be further extended.

'Restoration' means bringing back the monument or any part thereof, as nearly as possible, to an earlier known state or condition.

'Sculpture Shed' is a place where the archaeological remains belonging to the site and the adjoining area are kept in safe custody, under a shed.

'*Social Capital of Community*' is the networks of relationships among people who live and work in a particular society, enabling that society to function effectively.

'*Waqf* Board' is a body which handles certain movable, immovable Islamic properties.
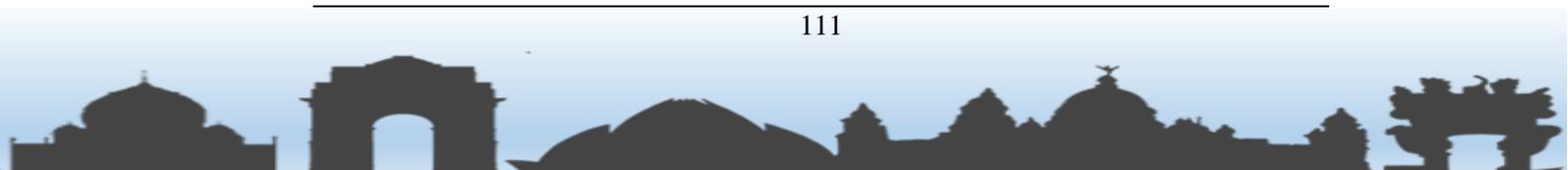
List of Abbreviations

AA	Assistant Archaeologist
AT	The Antiquities and Art Treasures Act
AHMASR	The Ancient and Historical Monuments and Archaeological Sites and Remains Act
AMASR	The Ancient Monuments and Archaeological Sites and Remains Act
AMP	The Ancient Monuments Preservation Act
ASA	Assistant Superintendent Archaeologist
ASI	Archaeological Survey of India
ATN	Action Taken Note
BCE	Before Common Era
CABA	Central Advisory Board on Archaeology
CAC	Central Antiquity Collection
CAG	Comptroller and Auditor General of India
CCTV	Closed-circuit Television
CE	Common Era
CEO	Chief Executive Officer
CPM	Centrally Protected Monuments
CPWD	Central Public Works Department
DDA	Delhi Development Authority
DRC	Documentation Resource Centre
GVO	Global *Vaish* Organisation
HBL	Heritage Bye-Laws
IM	Indian Museum
MCD	Municipal Corporation of Delhi
MoU	Memorandum of Understanding
MTS	Multi-Tasking Staff
NBCC	National Building Construction Corporation
NCF	National Culture Fund
NM	National Museum
NMA	National Monument Authority
NMHC	National Maritime Heritage Complex
NMMA	National Mission on Monuments and Antiquities
NPC-AMASR	National Policy for Conservation of the Ancient Monuments, Archaeological Sites and Remains
NPCC	National Projects Construction Corporation
PAC	Public Accounts Committee
PPP	Public Private Partnership
RFID	Radio Frequency Identification
SDMC	South Delhi Municipal Corporation
SLIC	State Level Implementing Committee
SSC	Staff Selection Commission
TCIL	Telecommunications Consultants India Ltd.
UPSC	Union Public Service Commission
UNESCO	United Nations Educational, Scientific and Cultural Organisation
V&A	Victoria & Albert
WAPCOS	Water and Power Consultancy Services
WHS	World Heritage Sites