



Government of Kerala



**Cadre Review and
Work study of the
Department of Environment
and Climate Change
and its Associated Authorities
(SEIAA, SWAK, KCZMA)**



**Institute of
Management in
Government**



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(An Autonomous institution under the aegis of the Government of Kerala)

Vikas Bhavan P.O., Thiruvananthapuram - 695033

Phone: 04712304341

Email: imgtvp@gmail.com

Web: www.img.kerala.gov.in

Cadre Review and Work Study of the Department of Environment and Climate Change Government of Kerala and its Associated Authorities (SEIAA, SWAK, KCZMA)

April 2026

Study Team:

Dr. Mini B. Nair, Lead Consultant and Professor, IMG

Shri. Mohananadha Babu, Additional Secretary to Government (Retd.)

Shri. K. Maheendran Nair, Joint Secretary to Government (Retd.)

Smt. Shuja R., Additional Secretary to Government & Associate Fellow, IMG

Smt. Gowri M., Assistant Professor, IMG

Shri. Aswin T.K., Research Associate, IMG





**Institute of
Management in
Government**
Thiruvananthapuram



FOREWORD

February 2026

As Kerala confronts the escalating reality of climate change, the Department of Environment and Climate Change (DoECC) must evolve from a regulatory body into a strategic force for resilience. This Cadre Review, conducted by the Institute of Management in Government, addresses the critical structural gaps hindering this transition.

This study reveals a stark dichotomy: while the mandate of the DoECC has expanded exponentially over the last decade to include critical statutory functions related to Environmental Impact Assessment (SEIAA), Coastal Zone Management (KCZMA), and Wetland Conservation (SWAK), its organizational structure has remained static. The department is currently operating under a model of "borrowed capacity," where core strategic functions are often compromised to meet immediate regulatory pressures.

This study advocates for a fundamental shift from this reactive posture to a "Strategic Realignment." The recommendations presented herein are not merely about augmenting staff numbers; they propose a structural re-engineering of the department into functionally specialized divisions. This transformation is designed to institutionalize expertise, ensure efficient functioning of statutory authorities, and empower the DoECC to fulfill its critical role in the implementation of the State Action Plan on Climate Change (SAPCC 2.0).

I commend the study team led by Prof. Dr. Mini B. Nair, for their diligent efforts. I also express my gratitude to Shri. Suneel Pamidi IFS, Director, DoECC, whose proactive cooperation and insights were invaluable to this study.

It is my earnest hope that the Government finds these recommendations actionable and that this report serves as a blueprint for building a modern, resilient, and future-ready Department of Environment and Climate Change.

Tinku Biswal, IAS
Director General



**Institute of
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PREFACE

February 2026

Kerala stands at a critical environmental crossroads. The recurring natural calamities and the insidious onset of climate change have starkly demonstrated that environmental governance can no longer be a peripheral concern; it must be central to the State's development discourse. The Department of Environment and Climate Change (DoECC), as the nodal agency for this mandate, bears the heavy responsibility of steering the state toward climate resilience and sustainable development.

This study, "Cadre Review and Work Study of the Department of Environment and Climate Change," was undertaken to scientifically assess whether the Department's institutional capacity is commensurate with its rapidly expanding responsibilities.

Our inquiry was driven by a fundamental question: Can a structure designed for the regulatory needs of 2010 effectively manage the climate crisis of the 2020s? Through a rigorous methodology involving functional mapping, workload quantification, and gap analysis, we found that the Department is operating under severe structural strain. The addition of major statutory mandates—specifically the SEIAA, KCZMA, and SWAK—without a corresponding increase in human resources has created a model of "borrowed capacity," where the Directorate's core functions are often compromised to meet statutory exigencies.

This report attempts to move beyond a simple request for additional staff. Instead, it proposes a strategic reorganization of the DoECC into functionally specialized divisions. We argue that strengthening the Department is not merely an administrative exercise but a strategic necessity to ensure the successful implementation of the State Action Plan on Climate Change (SAPCC 2.0).

I am grateful to the Government of Kerala and DoECC for entrusting us with this vital study. It is my sincere hope that the recommendations outlined in these pages will provide the structural foundation for an efficient and future-ready Department of Environment and Climate Change.

For Study Team
Prof. (Dr.) Mini B. Nair

ACKNOWLEDGEMENTS

It is with profound gratitude that I acknowledge the individuals and institutions whose generous support and committed efforts were instrumental in the successful completion of this study.

I am deeply indebted to Smt. Tinku Biswal, IAS, Director General, IMG, for her mentorship and guidance.

I am extremely thankful to Shri. Seeram Sambasiva Rao, IAS, Special Secretary, Department of Environment, Government of Kerala, for his support throughout the course of this endeavour.

I gratefully acknowledge the leadership of the Department of Environment and Climate Change. I am particularly indebted to the Director, Shri Suneel Pamidi, IFS, whose foundational groundwork and continued guidance provided the essential momentum for this study and were critical to its steady advancement. Furthermore, this work has benefitted immensely from the cooperation of the employees and stakeholders of the Department; their willingness to share time, expertise, and candid insights enriched our analysis with valuable perspectives.

Most importantly, this report relies on the dedicated efforts of the study team members: Shri Mohananadha Babu, Additional Secretary to Government (Retd.); Shri K. Maheendran Nair, Joint Secretary to Government (Retd.); Smt. Shuja R., Additional Secretary to Government & Associate Fellow, IMG; and Smt. Gowri M., Assistant Professor, IMG. I also thank my Research Associate, Shri Aswin T. K., and Confidential Assistant Smt. Anupama for their diligent assistance and support. Their collective commitment was the driving force behind this report.

Prof. (Dr.) Mini B. Nair



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DEPARTMENT OF ENVIRONMENT AND CLIMATE CHANGE (DOECC)

Vision

Placing the environmental concerns at the forefront of sustainable development for maintaining the quality of life of the people of the State

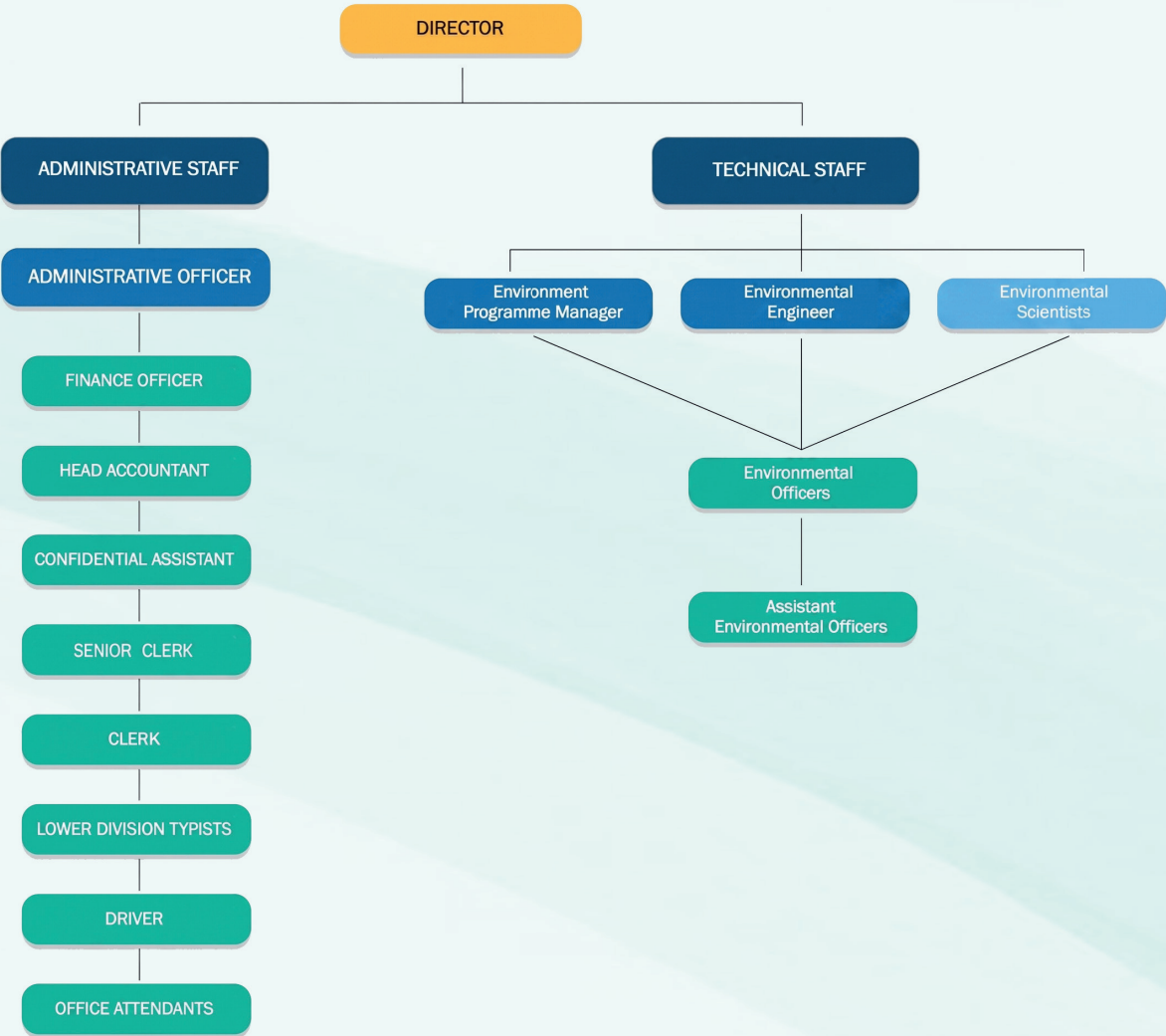
Mission

- ◆ Strengthening environmental governance for maintaining environmental sustainability of the state
- ◆ Integrating environmental aspects in the development processes
- ◆ Investment in environmental management programmes in the state at community level
- ◆ Create a civic movement on upkeep of environmental sustainability

Core Functions

- ◆ Take up State level environment development programmes and implement them in collaboration with appropriate agencies;
- ◆ Coordinate the programmes for the revision and implementation of State Action Plan on Climate Change (SAPCC), set up Climate Change Cell at various sectors;
- ◆ Exercise administrative control of all environmentally related authorities / institutes being established in State;
- ◆ Conduct environmental appraisal at planning level related to the development schemes of the State Government;
- ◆ Coordinate the environmental awareness and incentives programmes in education institutes and society to evoke the responsibility of individuals to respect, protect, and preserve the environment.
- ◆ Encourage the environmental research and development to broaden the knowledge and to develop new sustainable novel technologies.

Existing Organisational Structure



INTRODUCTION

1.1. Context: Kerala's Unique Environmental Paradigm

The State of Kerala, often celebrated for its exceptional natural beauty and high human development indices, is a region of profound ecological contrasts and acute sensitivities. Its unique geoclimatic paradigm is defined by a narrow strip of land, averaging just 120km in width, flanked by the Arabian Sea to the west and the towering Western Ghats mountain range to the east. This distinctive topography creates two parallel, yet deeply interconnected, ecological zones of immense global and national importance, which are simultaneously the bedrock of the state's economy and the source of its greatest vulnerabilities.

To the east, the Western Ghats, a UNESCO World Heritage Site, represents one of the world's eight 'hottest hotspots' of biological diversity. Older than the Himalayas, this mountain chain is a treasure trove of endemic flora and fauna, hosting at least 325 globally threatened species and thousands of plant species found nowhere else on Earth. Beyond its biodiversity, the Ghats serve a critical hydrological function, acting as the primary watershed for peninsular India and decisively influencing the Indian monsoon system. The orographic effect of the mountains intercepts rain-laden winds, ensuring the sustenance of the region's 44 perennial rivers and, by extension, the agricultural and energy security of millions.

Parallel to this highland ecosystem, the state's 590-km coastline and its intricate network of backwaters form a zone of comparable ecological significance and fragility. This low-lying coastal plain is one of the most densely populated regions in India, where a unique ecosystem has formed from the confluence of freshwater rivers and the saline waters of the Arabian Sea. This delicate estuarine environment supports a rich aquatic biodiversity and is central to the livelihoods of the state's large fishing communities.

However, this natural endowment is under unprecedented strain from intense anthropogenic pressures. With a population density more than double the national average, Kerala has experienced rapid urbanization and a societal shift towards high-consumption lifestyles, placing its finite natural resource base under severe stress. This dynamic has created a fundamental paradox at the heart of Kerala's development model: the state's primary economic drivers are intrinsically linked to its greatest environmental vulnerabilities. The economy relies heavily on leveraging its natural assets—the fertile slopes of the Ghats for cash crops like tea, coffee, and spices, and the scenic beauty of both the hills and the coast for a globally recognized tourism industry. Yet, these very activities often degrade the assets they depend upon. Unregulated construction for tourism, deforestation for plantations destabilize slopes and degrade watersheds, amplifying the risk of catastrophic landslides. Similarly, the high density of tourism infrastructure and population along the coast contributes to the pollution of the backwaters and increases the exposure of life and property to coastal erosion and sea-level rise. This dangerous feedback loop, where the pursuit of economic growth actively magnifies climate and environmental risk, establishes that environmental governance is not a peripheral concern but is central to the state's long-term economic stability and the well-being of its people.

1.2. The Imperative for a Dedicated Environmental Governance Framework

In response to the growing recognition of these complex and interconnected challenges, the Government of Kerala has progressively evolved its institutional framework for environmental management. This evolution culminated in the establishment of the Department of Environment and Climate Change (DoECC) in December 2010, which succeeded the Environmental Management Agency formed in 2007. The creation of a dedicated Department of Environment and Climate Change (DoECC) signifies a crucial conceptual shift in the state's governance—a move away from managing isolated environmental problems in silos towards an integrated approach that acknowledges climate change as a systemic, cross-sectoral threat multiplier.

The official mandate of the DoECC is to implement policies and programmes concerning the conservation of the state's natural resources and biodiversity, alongside the prevention and abatement of pollution, all guided by the overarching principle of sustainable development. The Department's vision is "to place environmental concerns at the forefront of sustainable development," underscoring its intended strategic importance within the state's administrative architecture. The DoECC, as its operational arm, is tasked with a range of critical functions that reflect this integrated approach. These include undertaking state-level environmental development programmes, conducting environmental appraisals of development schemes proposed by other government departments, and exercising administrative control over affiliated environmental authorities and institutes.

Most significantly, the DoECC serves as the nodal agency for coordinating all activities related to climate change in the state. It was responsible for drafting the Kerala State Action Plan on Climate Change (SAPCC) in 2014 and a revised version, SAPCC 2.0 which was approved by the State Level Steering Committee on December 2, 2022. This designation institutionalizes the understanding that climate change is not a standalone issue to be managed by a single-purpose body. Instead, its impacts permeate every sector—from agriculture and water resources to health and urban planning—requiring a central agency with a holistic mandate to coordinate a cohesive, state-wide response. The Department's function to conduct "environmental appraisal at planning level" for the schemes of other departments is a structural recognition of this reality, aiming to mainstream environmental and climate considerations across the entire government apparatus. This administrative evolution is a direct response to the scientific and experiential reality of climate change, acknowledging that

decisions made in one sector have cascading effects across the entire socio-ecological system of Kerala.

1.3. The Escalating Climate Crisis: A Compelling Case for the Department's Existence

The imperative for a dedicated and effective DoECC is no longer a matter of theoretical debate or future planning. Kerala is now widely recognized as a "hotspot of climate vulnerability" within India, where the impacts of climate change have transitioned from abstract projections to a recurring and devastating reality. A pattern of rising temperature, altered rainfall regimes, and an increased frequency of extreme weather events has become the new norm, repeatedly testing the state's resilience and exposing its deep-seated vulnerabilities.

The 2018 floods stand as a watershed moment in the state's recent history, a catastrophe of a scale not seen in nearly a century. During the monsoon period, Kerala received rainfall that was 42% above normal, with an unprecedented 164% departure from the average in August alone. This torrential downpour, combined with systemic issues resulted in widespread devastation. The human toll was immense, with over 480 lives lost and 1.4 million people displaced from their homes. The economic impact was equally staggering, with post-disaster needs assessments estimating the total loss and recovery needs to be between USD 3.7 billion to 4.4 billion.

The lessons from 2018 were tragically reinforced by the 2024 Wayanad landslides. Triggered by over 570 mm of rainfall in just two days, a series of massive debris flows obliterated entire villages, claiming nearly 300 confirmed lives, with over a hundred individuals remaining missing, and leaving hundreds injured. This event was not an isolated anomaly but part of an alarming trend; several landslides, including Kavalappara landslides (2019), have been recorded across the state's highlands since 2018, underscoring the lethal combination of extreme weather and anthropogenic pressures such as deforestation and unscientific development in ecologically fragile zones.

Beyond these acute, high-impact disasters, Kerala faces a chronic, slow-onset crisis along its coast. Approximately 60% of the state's 590-km coastline is subject to active erosion, a process exacerbated by rising sea levels and destructive coastal development. Projections based on data from the Intergovernmental Panel on Climate Change (IPCC) paint a grim future: a 1-meter rise in sea level, a plausible scenario within this century, could permanently inundate 374 sq km of coastal land. This would disproportionately affect the low-lying and densely populated districts of Alappuzha, Ernakulam, and Thrissur, large parts of which could be below sea level by 2050. This is not a distant threat; tide gauge data from Kochi already indicates an observed sea-level rise of 1.8 mm per year. The convergence of these multifaceted threats—from the mountains to the coast—makes a compelling and undeniable case for the existence and mission of the Department of Environment and Climate Change.

Table 1.1: A Synopsis of Key Environmental and Climate Vulnerabilities in Kerala

Vulnerability	Manifestation / Key Events	Affected Regions / Sectors	Documented Socio-Economic Impact
Extreme Rainfall & Floods	2018 Floods: 42% above normal monsoon rainfall, with 164% departure in August. Widespread inundation and dam overflows.	13 of 14 districts were affected, particularly in Periyar and Pamba river basins. Agriculture, housing, infrastructure, and tourism sectors devastated.	Over 480 deaths, 1.4 million displaced. Economic loss and recovery needs are estimated at USD 3.7-4.4 billion.

Vulnerability	Manifestation / Key Events	Affected Regions / Sectors	Documented Socio-Economic Impact
Landslides & Debris Flows	2024 Wayanad Landslides: Triggered by >570 mm of rain in two days.	Affects plantation workers, rural communities, and infrastructure.	Nearly 300 confirmed deaths and over 100 missing; hundreds injured. Widespread destruction of homes, farmland, and infrastructure, with property damage estimated at ₹1,200 crore (USD 140 million).
Coastal Erosion & Sea-Level Rise	Approx. 60% of coastline eroding. Observed sea-level rise of 1.8 mm/year at Kochi.	Entire 590-km coastline, especially low-lying areas in Alappuzha, Ernakulam, Thrissur. Affects fishing communities, coastal infrastructure, and freshwater resources.	Loss of land, homes, and livelihoods for fishing communities. Increased risk of coastal flooding and saltwater intrusion into aquifers. Coastal protection requires an estimated ₹11,650 crore.
Water Pollution	Contamination of rivers with industrial effluents and sewage. High levels of microplastic pollution in backwaters	Rivers, lakes, and backwaters. Affects drinking water sources, aquatic ecosystems, fisheries, and public health.	Increased incidence of waterborne diseases like hepatitis. Threat to fisheries, a key economic sector, and contamination of the food chain.
Waste Management Crisis	Ineffective management of municipal solid waste, leading to overflowing dumpsites and pollution.	Urban and peri-urban areas, particularly around major cities like Kochi. Affects public health, land, and water quality.	Brahmapuram landfill fire (2023) caused severe air pollution and public health emergencies, highlighting systemic failures in urban governance and environmental regulation.

1.4. The Need for Strengthening the Department of Environment and Climate Change

The sheer scale and complexity of the challenges detailed above necessitate more than just the existence of an environmental department; they demand its strategic strengthening. The current governance model has often been reactive, with major policy revisions, such as the formulation of the Kerala State Action Plan on Climate Change 2.0 (SAPCC 2.0), being catalyzed by the urgent need to respond to recent disasters. While such responses are vital, a fundamental shift is required from a paradigm of post-disaster recovery to one of proactive, long-term resilience planning. Strengthening the DoECC is the institutional linchpin for this strategic transition.

The cross-sectoral nature of climate change and environmental degradation means that effective

solutions cannot be implemented in isolation. A strengthened DoECC is essential to provide expert oversight and enforce the integration of climate resilience across all major economic and development sectors. This includes guiding the agricultural sector towards climate-resilient practices, steering the state's ambitious transition to 100% renewable energy by 2040, and ensuring that rapid urbanization does not create new vulnerabilities. The Brahmapuram waste crisis serves as a stark case study—a multifaceted failure of urban planning, public health, and pollution control that underscores the need for an integrated response that only a high-capacity, empowered central environmental agency can effectively coordinate.

The core objective of the SAPCC is to "mainstream climate change strategies into State Level Planning and Development process". Achieving this goal presents immense institutional challenges that a strengthened DoECC must be equipped to overcome.

A critical impediment to the DoECC's effectiveness is the severe mismatch between its expanding mandate and its stagnant human resources. Since its inception, the Department of Environment and Climate Change (DoECC) has operated with a skeletal staff structure, even as its responsibilities have grown to include the integration of statutory bodies like the State Environmental Impact Assessment Authority (SEIAA), the State Wetland Authority of Kerala (SWAK), and the Kerala Coastal Zone Management Authority (KCZMA). The implementation of crucial environmental protection laws is consequently hampered by a chronic lack of technical staff within these authorities, which function in tandem with the DoECC. This deficit extends to the Kerala Centre for Integrated Coastal Management (KCICM) and the Climate Change Cell (CCC), whose functions are similarly constrained. Despite a manifold increase in its assigned duties over the years, the Directorate's core manpower, including its ministerial staff, has remained significantly unchanged, creating an unsustainable operational strain.

This acute shortage of technical personnel has direct and debilitating consequences on the Department's operational capacity. With its limited manpower, the DoECC and associated authorities struggle to ensure timely and effective attendance at critical meetings and conduct necessary field inspections across the state, many of which are mandated by the Supreme Court, High Court, National Green Tribunal, and various legislative committees. The Directorate is inundated with a large volume of environmental complaints from across Kerala, many of a grave nature requiring immediate site visits and urgent action. Currently, this state-wide responsibility falls on the shoulders of the few staff members based at the Directorate, inevitably resulted in significant delays in addressing pressing environmental issues. Furthermore, the preparation of technical reports for sub-judice matters and other subjects assigned by the government is a tedious and difficult task to accomplish in a timely manner with the existing staff.

The staffing crisis also has detrimental financial and strategic implications. The practice of sparing staff from the Directorate for the activities of its associated authorities has negatively impacted the DoECC's own plan expenditure and has hindered the timely implementation and monitoring of both centrally sponsored and externally aided schemes.

Finally, strengthening the DoECC is critical for meeting future imperatives and avoiding the repetition of past failures. The state has set ambitious long-term targets, including achieving net carbon neutrality by 2050. Realizing these goals requires a sophisticated institutional apparatus to navigate the complex regulatory, technological, and financial pathways, and to attract the necessary climate finance from national and international sources. Moreover, recurring criticisms from central government bodies and the judiciary regarding government neglect of environmental factors leading to disasters like the Wayanad landslides highlight the severe consequences of not adequately empowering the state's nodal environmental agency. Therefore, "strengthening" the DoECC is not

merely a request for more resources; it is a strategic argument for elevating its position within the state's governance structure. It must evolve from a coordinating body with a primarily advisory role to an empowered authority with the regulatory capacity to enforce cross-sectoral compliance on environmental and climate mandates.

1.5 Objectives of the study

- ◆ To assess the quantum of activities undertaken by the Directorate and its associated Authorities (SEIAA, SWAK, KCZMA) in pursuit of their respective missions.
- ◆ To analyze the current workload against existing manpower to identify critical gaps and deficiencies preventing the Department from fulfilling its responsibilities effectively.
- ◆ To propose a revised organizational structure that is logically designed to accomplish the strategic goals and objectives of the Department.
- ◆ To formulate a detailed staffing pattern, including recommendations for the creation of new posts and the framing of special rules to govern recruitment and service conditions.

METHODOLOGY

2.1. Introduction to the Methodological Framework

This chapter outlines the systematic methodology employed for the cadre review of the Department of Environment and Climate Change (DoECC), Government of Kerala. The primary objective of this study is to conduct a comprehensive analysis of the Directorate of Environment and Climate Change and its associated authorities, with a specific emphasis on evaluating the adequacy of its current organizational structure and staff strength in relation to its expanding mandate and the escalating environmental challenges facing the state.

The methodological approach has been designed to be rigorous, objective, and evidence-based, ensuring that the findings and subsequent recommendations are grounded in a verifiable analysis of the Department's functions, workload, and operational capacity. Recognizing the complexity of environmental governance, which involves a wide array of statutory, technical, and administrative responsibilities, a multi-faceted research design was adopted. This approach combines qualitative analysis of institutional frameworks with quantitative assessment of workload and human resource allocation. The core of this methodology is a detailed workload analysis aimed at scientifically determining the gap between the human resources required to effectively fulfill the DoECC's mandate and the resources currently available. This framework allows for a granular examination of the Department's operational realities, providing a solid foundation for recommendations focused on institutional strengthening.

2.2. Research Design and Approach

The study employs a descriptive and analytical research design, utilizing a mixed-methods approach that integrates both qualitative and quantitative data. This design is particularly suited for an organizational study of a government

institution, as it allows for a holistic understanding of not only the official structures and mandates but also the practical challenges of implementation. The study is structured as a form of performance audit, focusing on the principles of economy and efficiency in the context of human resource management. It seeks to answer the fundamental question: Does the DoECC possess the necessary staff strength and composition to perform its designated functions economically, efficiently, and effectively?

The research process was structured into three distinct phases:

Phase 1 Foundational Scoping and Mandate Analysis: This initial phase involved a comprehensive review of secondary data to establish a clear and detailed understanding of the DoECC's legal and administrative mandate, its organizational evolution, and the full spectrum of its assigned responsibilities. This formed the basis for all subsequent analysis.

Phase 2: Data Collection and Workload Quantification: The second phase focused on gathering primary and secondary data to quantify the volume and complexity of the work performed by the Department. This involved direct engagement with the Department to collect operational statistics and qualitative insights into work processes.

Phase 3: Gap Analysis and Synthesis: The final phase involved analyzing the collected data to compare the required workload with the available manpower. This quantitative gap analysis, supplemented by qualitative findings, was then synthesized to formulate the conclusions and recommendations of this report.

2.3. Data Collection Methods

A combination of primary and secondary data collection methods was utilized to ensure a comprehensive and triangulated assessment of the DoECC's staffing needs.

Secondary Data Collection and Documentary Analysis

An extensive review of official documents was conducted to map the institutional framework, sanctioned roles, and functional responsibilities of the DoECC. This content analysis was critical for identifying every mandated task that forms the basis of the workload assessment. The key documents reviewed include:

Government Orders and Notifications: All relevant Government Orders (G.O.s) pertaining to the establishment of the Environmental Management Agency, its transformation into the Department of Environment and Climate Change, and subsequent orders assigning new roles and responsibilities.

Statutory and Policy Documents: The Kerala State Action Plan on Climate Change (SAPCC 1.0 and the revised SAPCC 2.0), the Kerala State Environment Policy, and rules and notifications issued under The Environment (Protection) Act, 1986.

Institutional Reports: Annual administrative reports of the Department, performance reports, and documents related to the functioning of associated statutory authorities such as the State Environmental Impact Assessment Authority (SEIAA), State Wetland Authority of Kerala (SWAK), and the Kerala Coastal Zone Management Authority (KCZMA).

High-Level Committee Reports: Assessments and recommendations regarding the DoECC's institutional capacity were sourced from the reports of the Administrative Reforms Commission (ARC), the Rebuild Kerala Development Programme (RKDP), and the Expert Subgroup on the Forest & Environment Sector (14th Five-Year Plan).

Legislative and Judicial Records: Reports of the Kerala Legislative Assembly Committee on Environment and directives from the High Court of Kerala and the National Green Tribunal.

Financial and HR Records: Sanctioned staff strength orders, citizen charters, duties and responsibilities of officials and plan expenditure documents to establish the baseline of available human and financial resources.

Primary Data Collection

Primary data was gathered to supplement and validate the information from secondary sources, providing crucial insights into the operational realities and time requirements of various tasks. The methods included:

Structured Interviews: In-depth, semi-structured interviews were conducted with key officials and staff members within the DoECC, including senior officials, technical officers, and ministerial staff. These interviews were designed to understand the workflow, time spent on different types of tasks, operational challenges, and the nature of inter-agency coordination.

Workload Data Compilation: A systematic collection of operational data for a defined reference period was undertaken. This included quantifying the volume of key work drivers, such as the number of public complaints received and processed, field inspections conducted, court cases and tribunal hearings attended, technical reports prepared, and meetings convened or attended across the state.

2.4. Analytical Framework

The data collected was analyzed using a structured framework designed to systematically assess the gap between the DoECC's responsibilities and its capacity.

Workload Assessment and Staffing Gap Analysis

The core of the methodology is a quantitative workload analysis, a standard tool for determining optimal staffing levels in an organization. This analysis was conducted through a systematic, multi-step process:

1. **Task Inventory and Categorization:** Based on the documentary analysis and interviews, a comprehensive inventory of all tasks performed by the DoECC was created. These tasks were then grouped into logical categories based on functions.
2. **Quantification of Work Volume:** For each task category, the annual volume of work was determined using the primary and secondary data collected. For instance, the number of complaints received per year, the number of field inspections mandated, or the number of reports required by statutory bodies.
3. **Estimation of Standard Time Norms:** A critical step was to estimate the average number of man hours required to complete one unit of each task. For example, the staff-days required to process a single environmental complaint from receipt to resolution, including field inspection, report preparation, and follow-up. These time norms were derived through a combination of process mapping, analysis of work logs, and expert judgment based on interviews with experienced staff.
4. **Calculation of Total Required Man Hours:** The total annual workload for the Department was calculated by multiplying the annual volume of each task by its estimated time norm and summing the results across all task categories.

o Formula: Total Required Man Hours = Σ (Annual Volume of Task \times Man Hours per Task)

5. **Calculation of Available Man Hours:** The total number of man hours available per year was calculated based on the current sanctioned staff strength. This calculation accounted for non-working days, including public holidays, weekends, and an average number of leave days (casual, earned, etc.) as per government norms.

o Formula: Available Man Hours = (Number of Staff) × [(Total Working Days in a Year - Average Leave Days) × 8 Hours per day]

6. **Staffing Gap Analysis:** The final step involved a direct comparison of the total required man-hours with the total available man hours. This analysis yielded a quantitative measure of the surplus or deficit in manpower, providing a clear, data-driven assessment of the staffing situation within the DoECC.

Competency and Structural Analysis

Beyond a purely quantitative assessment, a qualitative analysis was conducted to evaluate the composition and structure of the workforce. This involved mapping the nature of the required tasks (e.g., highly technical, legal, administrative, field-based) against the skill sets of the existing staff (e.g., scientific officers, legal experts, clerical staff). This helped in identifying not just the numerical gap in staffing, but also any potential mismatches in competencies and the need for a more diversified or specialized workforce to handle the complex and evolving mandate of the Department.

2.5. Scope and Limitations of the Study

This study is focused specifically on the organizational structure and staff strength of the Department of Environment and Climate Change and its interaction with associated bodies like SEIAA, SWAK, and KCZMA. The accuracy of the workload analysis is contingent upon the reliability of the operational data provided by the Department and the time norms estimated through interviews and process analysis. Every effort has been made to validate this data through cross-verification and triangulation to ensure the findings are as robust and representative as possible.

ORGANIZATIONAL ANALYSIS

3.1. Introduction: A Structure under Strain

The effectiveness of any government body is fundamentally linked to its organizational structure and its capacity to execute its mandate. This chapter presents a detailed organizational analysis of the Department of Environment and Climate Change (DoECC). This analysis explores the evolution of the Department's mandate, the current composition of its staff, and its functional relationship with the various statutory authorities under its administrative oversight.

The central finding of this analysis is a significant and systemic mismatch between the DoECC's greatly expanded responsibilities and its unchanged, minimal staffing structure. Since its inception, the Department has been assigned an increasingly complex portfolio of technical and legally mandated functions, yet its human resources have not grown in proportion to these demands. This has placed the entire environmental governance framework of the state under immense strain, leading to operational inefficiencies, statutory non-compliance, and an impaired ability to address pressing environmental and climate challenges. This chapter will deconstruct the organizational framework to reveal the structural causes of these deficiencies and establish the foundational argument for significant institutional strengthening.

3.2. The Evolution of an Expanding Mandate

The Department of Environment and Climate Change was officially established on December 18, 2010, through the upgradation of the erstwhile Environmental Management Agency Kerala (EMAK). It was created with an initial sanctioned staff strength of 19 personnel across all categories to serve as the nodal agency for the state's environmental policies and programs. Its original mandate was broad and strategic, encompassing a range of key functions :

- Implementation of State-Level Developmental Programmes (including Plan, Non-Plan, Centrally Sponsored, and Externally Aided Schemes).
- Coordination of activities related to the National Action Plan on Climate Change.
- Administrative control over all environmentally related institutes in the state.
- Investigation and action on complaints under The Environment (Protection) Act, 1986.
- Environmental appraisal of development schemes proposed by other government departments.
- Scrutiny of environment-related proposals from both governmental and non-governmental organizations.
- Coordination with other departments on environment, awareness generation, and climate change management.

However, over the subsequent decade, the DoECC's responsibilities grew exponentially, not through a gradual expansion of its core duties, but through the administrative attachment of several major statutory authorities and specialized centers. This process of "**mandate creep**" fundamentally altered the scope and complexity of the Department's work. The key additions included :

State Level Environment Impact Assessment Authority (SEIAA) and State Level Expert Appraisal Committee (SEAC) in 2012.

State Wetland Authority Kerala (SWAK) in 2016.

Kerala Coastal Zone Management Authority (KCZMA) in 2016-2017.

Kerala Centre for Integrated Coastal Management (KCICM) in 2016.

State Climate Change Cell (CCC) in 2018.

The KCZMA was previously functioning under the Department of Science & Technology with adequate work force support. Its attachment to the Department of Environment and Climate Change (DoECC) without the corresponding transfer of human resources or the creation of additional posts, resulting in constraints on their effective and smooth functioning.

Critically, these authorities were attached to the Department without any sanctioned posts of their own. The official government orders housed these bodies within the DoECC, but failed to provide them with the dedicated human resources required to function. Consequently, the entire burden of executing their highly specialized and legally binding functions fell upon the existing, limited staff of the core Directorate. This foundational decision created a structural deficit that has defined the operational reality of the DoECC ever since, transforming it from a strategic coordinating body into an overburdened administrative hub struggling to service multiple under-resourced entities.

3.3. The Core Directorate (DoECC): Sanctioned vs. Operational Strength

An examination of the DoECC's present staff pattern reveals an organization that is numerically inadequate for its designated role.

The composition of this staff is as critical as its number. The entire technical and scientific capacity of the Department rests with a small core of just eight officers: one Programme Manager, one Engineer, two Scientists, two Environmental Officers, and two Assistant Environmental Officers. This small team is responsible for fulfilling not only the original, expansive mandate of the DoECC but also for providing the technical expertise required to run the attached authorities. This structure concentrates an immense and diverse workload onto a handful of individuals, creating an unsustainable and inefficient operational model.

Table 3.1: Present Regular Staff Pattern of the Directorate of Environment and Climate Change (DoECC)

Sl. No.	Name of Post	Number of Sanctioned Posts	Present Strength
1	Director	1	1
2	Environment Programme Manager	1	1
3	Environmental Engineer	1	1
4	Environmental Scientist	2	2
5	Environmental Officer	2	2
6	Assistant Environmental Officer	2	2
7	Administrative Officer	1	1
8	Finance Officer	1	1
9	Head Accountant	1	1
10	Lower Division Clerk	2	2
11	Confidential Assistant	1	1
12	Lower Division Typist	2	1
13	Driver	1	1
14	Office Attendant	2	2
Total		20	19

3.4. Analysis of Attached Authorities: Borrowed Capacity and Functional Deficits

The primary structural weakness of the DoECC lies in the complete dependency of its statutory authorities on the core staff of the DoECC. These are not merely subordinate offices but independent bodies with significant legal powers and responsibilities, yet they have been established without the staff to exercise them.

State Environmental Impact Assessment Authority (SEIAA)

SEIAA performs one of the most critical regulatory functions in the state: the appraisal of Category B projects and the issuance of Environmental Clearances (EC) under the EIA Notification, 2006. This is a time-bound, high-volume, and legally sensitive process that includes post-clearance monitoring. Despite its importance, SEIAA has no dedicated technical wing of its own. Its work is managed by the technical officers from the DoECC supplemented by contractual and deputation staff.

This arrangement has severe consequences. The workload is immense, as the non-functioning of District Level Environment Impact Assessment Authorities (DEIAAs) means all applications are processed at the state level. The officers are insufficient to handle the volume of project proposals, compliance reports, public petitions, and legal matters for the entire state. This leads directly to significant pendency in the processing of applications, which in turn attracts judicial intervention and criticism. The reliance on DoECC staff creates a vicious cycle: the statutory functions of SEIAA are delayed, and the core functions of the DoECC are simultaneously neglected.

State Wetland Authority Kerala (SWAK)

SWAK's mandate under the Wetlands (Conservation & Management) Rules, 2017, is extensive, covering everything from policy development and preparing digital inventories to implementing management plans and ensuring enforcement across all wetlands in Kerala. However, the authority is functionally hollow, as it has no regular technical employees whatsoever.

All technical work is attended to by temporarily recruited project staff and by DoECC staff on a part-time basis. The impact of this is starkly articulated in the Department's own assessment: the statutory functions and duties assigned to the Authority are "very poorly addressed," and the utilization of its budgetary outlay has been "marginal". This represents a clear case of institutional failure, where a critical environmental body exists on paper but lacks the human resources to perform its functions, resulting in both ecological and financial mismanagement.

Kerala Coastal Zone Management Authority (KCZMA)

KCZMA is tasked with protecting Kerala's 590-km coastline by regulating all developmental activities within the Coastal Regulation Zone (CRZ). This involves examining complex project proposals, inquiring into violations, and enforcing the provisions of the CRZ notification.

Its functions are supported by three technical officers from the DoECC who are designated on a part-time basis. This arrangement is explicitly acknowledged to be a cause of underperformance, negatively affecting the functional efficiency of both KCZMA and the DoECC. The timely disposal of applications and the robust enforcement of coastal regulations are simply not feasible under a model of borrowed, part-time staff.

State Climate Change Cell (CCC) and Kerala Centre for Integrated Coastal Management (KCICM)

The staffing crisis extends even to the state's most strategic and forward-looking initiatives. The Climate Change Cell (CCC) is the designated nodal agency for coordinating all climate change activities, including the implementation and monitoring of the State Action Plan on Climate Change (SAPCC 2.0). However, the very DoECC staff assigned to support the cell—the Environmental Scientist, Environmental Engineer, and Environment Programme Manager—are the same individuals being spared for the duties of SEIAA, KCZMA, and SWAK. This results in a "lapse of fulfilling the tasks of CCC as envisaged".

Similarly, the KCICM, requires dedicated technical officers to manage the environmental aspects of its sub-projects. The current structure does not provide for this, placing a significant, externally-funded program at risk of inefficient implementation.

3.5 The Domino Effect: Systemic Consequences of Understaffing

The Department of Environment and Climate Change (DoECC) has witnessed a significant expansion of its mandate following the attachment of statutory authorities such as SEIAA, SWAK, and KCZMA. The limited sanctioned staff strength, initially adequate for routine departmental functions, is now fully engaged in supporting these bodies, leaving insufficient capacity for DoECC's core functions in environmental planning, monitoring, and coordination. This has led to operational constraints and delays in implementing key environmental mandates. In view of the growing technical and analytical requirements of environmental governance, the creation of dedicated technical posts are essential to strengthen institutional capacity, ensure timely enforcement of environmental regulations, and enable evidence-based environmental planning and decision-making in the State.

The organizational model of attaching unfunded mandates to a chronically understaffed Department has created a domino effect of dysfunction across Kerala's environmental governance system. The "working arrangement" and "part-time duty" assignments are not sustainable solutions but symptoms of a deeper structural flaw. The systemic consequences are severe and multifaceted:

Failure to Perform Statutory Duties: Legally mandated functions related to environmental

clearance, wetland conservation, and coastal zone management are being poorly addressed or delayed, exposing the state to environmental degradation and legal challenges.

Inefficient Financial Management: The inability to execute programs, has led to the marginal utilization of funds, indicating a poor return on public investment. The need to spare staff has also detrimentally affected the DoECC's own plan expenditure.

Compromised Strategic Objectives: The state's highest-level strategic goals, such as implementing the State Action Plan on Climate Change, are being undermined because it lacks the required number of staff to coordinate and monitor action.

Operational Gridlock: The small pool of technical officers is stretched across an impossible range of responsibilities, from state-wide field inspections and complaint redressal to preparing technical reports for courts and legislative committees. This inevitably results in significant delays and undermines the quality and timeliness of the Department's work.

3.6 A Mismatch of Form and Function

The organizational structure of the Department of Environment and Climate Change is fundamentally misaligned with its functional responsibilities. It is a centralized model that concentrates a vast, diverse, and technically demanding workload—spanning at least six distinct institutional mandates—onto a single directorate whose staff strength has not evolved since its inception. The attached authorities, while existing in form, are functionally dependent and under-resourced, leading to a system-wide state of underperformance.

4 CHAPTER

STRATEGIC REALIGNMENT OF HUMAN RESOURCES (TECHNICAL WING)

4.1 The Evolving Scope of Environmental Governance in Kerala: From Conservation to Climate Resilience

The Department of Environment & Climate Change (DoECC), as the state's principal administrative body for environmental stewardship, finds its current organizational structure and human resource capacity increasingly misaligned with the strategic imperatives of a new reality. The mandate of the department has undergone a fundamental qualitative shift, moving beyond traditional conservation and pollution control to embrace the complex, cross-sectoral challenge of climate resilience.

This evolution was formally recognized in December 2010, when the department was constituted with 'Climate Change' explicitly incorporated into its name and mandate. This was not a nominal change but a deliberate reorientation of the department's purpose, designating it as the nodal agency for the planning, promotion, coordination, and oversight of all environmental policies and programmes, with a specific and elevated focus on climate change.

A primary and technically demanding function of the DoECC is the coordination, revision, and implementation of the State Action Plan on Climate Change (SAPCC). The SAPCC 2.0 is a critical, multi-sectoral endeavour essential for the state's long-term security and prosperity. This responsibility

signifies a shift from enforcing static environmental regulations to developing proactive, evidence-based strategies for a future defined by climate uncertainty. This qualitative change from a reactive regulatory body to a proactive strategic agency lies at the heart of the current human resource challenge. The structural deficiencies within the DoECC are therefore not merely administrative issues; they represent a significant strategic risk to the State of Kerala. An under-resourced nodal agency for climate change cannot effectively coordinate the SAPCC 2.0, potentially jeopardizing infrastructure investments, agricultural planning, and disaster management across the entire state government apparatus.

4.2 Analysis of the Current Structure: A Foundation under Critical Strain

A functional review of the DoECC’s technical wing reveals a structure designed for a previous era, now struggling to cope with a vastly expanded and qualitatively different set of responsibilities. The existing technical cadre, comprising a mere eight officers, was conceived for the environmental challenges of 2010, not the climate crisis of the 2020s and beyond. This minimal staffing level creates a fragile operational environment where the absence or preoccupation of even a single officer can lead to significant bottlenecks, exposing the department to considerable operational risk.

This lean structure, detailed in **Table 4.1**, is tasked with managing not only the core functions of the Directorate but also providing essential technical and administrative support to three major statutory bodies: the State Wetlands Authority Kerala (SWAK), the Kerala Coastal Zone Management Authority (KCZMA), and the State Environment Impact Assessment Authority (SEIAA). While these bodies possess functional autonomy, they lack dedicated technical secretariats, forcing them to rely almost entirely on the DoECC’s personnel.

Table 4.1: Existing Technical Staff Pattern

Cadre/Position	Sanctioned Strength
Environmental Programme Manager	1
Environmental Engineer	1
Environmental Scientist	2
Environmental Officer	2
Assistant Environmental Officer	2
Total	8

This arrangement has resulted in a "hollowing out" of the Directorate, where their expert staff are permanently co-opted to manage the day-to-day regulatory and operational duties of these authorities. The consequence is that the DoECC is forced to sacrifice its own strategic mandate—the very reason for its existence—to ensure the basic functioning of the authorities under its administrative control. The immense and legally mandated workload generated by these bodies, as detailed in Table 4.2., makes this an unsustainable organizational model.

Table 4.2.: Functional Demands of Associated Bodies on DoECC Technical Staff

Associated Body	Key Functions & Mandates	Required Technical Expertise	Nature of Workload
SWAK	Wetland inventory and notification; Preparation, implementation and review of Integrated Management Plans; enforcement of Wetlands Rules, 2017; compliance with Supreme Court, High Court and NGT directives.	Ecology, Hydrology, Environmental Law, Project Management.	Continuous, legally mandated, high public and judicial scrutiny.
KCZMA	Processing CRZ clearances; enforcement and monitoring of CRZ Notifications; advising on Coastal Zone Management Plan (CZMP) modifications.	Coastal Engineering, Environmental Planning, Geospatial Analysis, Regulatory Law.	High volume of applications, complex regulatory interpretation, enforcement-driven.
SEIAA	Appraisal of Environmental Impact Assessment (EIA) reports; granting of Environmental Clearances (EC) for "Category B" projects; post-EC monitoring.	Pollution Control, Industrial Processes, Risk Assessment, Sector-specific knowledge.	Quasi-judicial, technically intensive, deadline-driven, high-stakes decision-making.

4.3 Scientific Workload Assessment and Capacity Gap

To objectively assess the extent of capacity gap, a workload analysis was conducted. This analysis quantified the Key Workload Drivers into standardized man-hours. The data reveals that the technical wing of the department currently faces an annual workload of 49,560 man-hours.

To ensure an objective basis for restructuring, this workload assessment was derived by disaggregating the multi-functional individual work schedules of the current technical cadre. Recognizing that existing officers currently perform overlapping duties—often handling duties in connection with statutory authorities simultaneously with core Departmental tasks—this analysis extracted and segregated these distinct components to isolate the true man-hour requirement for each sector. Accordingly, in the following table, the category labelled 'Directorate' refers exclusively to the extracted core internal mandates—such as Climate Change planning, R&D, and Scheme implementation—stripped of the secretariat duties performed for the statutory bodies.

Table 4.3: Existing Workload Analysis

Division	Key Workload Drivers	Man Hours
SEIAA	Statutory Scrutiny (EC Apps, EMP/Mining Plans/DSR); Legal Defence; Compliance (Half-Yearly Reports, Complaints)	17,450
KCZMA	CRZ Clearances (Apps/Checklists); Field Duties (Inspections); Legal Inputs (NGT/High Court Cases)	11,180

Division	Key Workload Drivers	Man Hours
Directorate	Climate Cell (GHG Inventory, CN-50 Pathway, Consultations); Schemes (Bhoomithrasena/Paristhithikam Scrutiny/Evals/Grants); R&D (Proposals/Fellowships Monitoring)	11,350
SWAK	Wetland Notifications (Brief Docs/Demarcation); Implementation (IMPs Revision/Writing/Finalization); Field (Consultations/Ground-Truthing)	9,580
Grand Total	Total Annual Man-Hours Required	49,560

The chronic overstretching of staff has created two critical and interconnected structural deficiencies: a **Leadership Gap** and an **Operational Capacity Gap**. The Leadership Gap refers to the absence of a senior technical tier between the Director—typically an AIS officer with an administrative focus—and the mid-level scientific staff. This prevents effective oversight and strategic direction. The Operational Capacity Gap is a direct consequence of the inadequate number of staff, leading to bottlenecks, delays, and an inability to conduct thorough field inspections, forcing the department into a perpetually reactive mode where strategic planning is sacrificed for operational firefighting.

4.4 A New Strategic Architecture: Reorganizing for Functional Specialization

Addressing these deep-seated structural deficiencies requires more than a simple augmentation of staff; it necessitates a fundamental re-architecting of the department's organizational design. Simply adding personnel to a flawed structure is insufficient. A strategic reorganization around core functional areas is required to build lasting institutional capacity and transition the department towards a modern, resilient, and effective model of environmental governance.

It is therefore proposed that the technical wing of the DoECC be restructured into **four thematic divisions**, each aligned with a critical area of its mandate. This divisional structure fundamentally transforms the DoECC's operating model from being person-dependent to process-driven. The current system relies on a few specific individuals being consumed by the responsibilities of an associated body; if these individuals are absent or transferred, the functioning of these statutory bodies is severely compromised. By creating dedicated divisions, the responsibility is institutionalized. This creates redundancy, allows for the development of deep institutional knowledge, and establishes clear, standardized processes for handling the department's work. This reform builds institutional resilience and ensures that the crucial functions of environmental governance are not vulnerable to the movements of individual officers.

The four proposed thematic divisions are:

- 1. Impact Assessment Division:** This division will serve as the dedicated technical secretariat for the State Environment Impact Assessment Authority (SEIAA). Its singular focus will be on the appraisal of Environmental Impact Assessment (EIA) reports, management of the Environmental Clearance (EC) process, and post-EC monitoring and compliance, ensuring consistent, high-quality, and timely quasi-judicial support.
- 2. Coastal & Marine Ecosystems Division:** This division will function as the dedicated technical secretariat for the Kerala Coastal Zone Management Authority (KCZMA). It will house specialized expertise in coastal engineering, geospatial analysis of coastal zones, and the complex regulatory

framework of the CRZ notifications, providing robust support for processing clearances and ensuring enforcement along Kerala's extensive coastline.

3. **Wetlands Division:** This division will act as the dedicated technical secretariat for the State Wetlands Authority Kerala (SWAK). It will focus on the scientific and technical aspects of wise-use, conservation, and wetland management, including inventory, notification, review of management plans, and compliance with judicial directives.
4. **Environmental Education, Climate Change and Planning Division:** This division will serve as the strategic nerve centre of the Department, combining long-term planning with active research and public outreach. To ensure focused attention on its distinct mandates, this division will be organized into two functional sections:

Environmental Education and Planning Section: This section will serve as the State's nodal unit for advancing environmental awareness, sensitization, and strategic environmental planning. It will spearhead initiatives that foster environmental consciousness and institutional capacity through comprehensive education, awareness, training, and outreach programmes, empowering citizens and institutions alike to become active partners in environmental stewardship. It will also guide the integration of environmental principles into developmental and socio-political planning.

Climate Change & Research Section: This section will serve as the State's nodal unit for climate change actions coordination, adaptation planning, and scientific assessment. It will lead initiatives to develop and implement climate-resilient strategies and ensure cross-sectoral integration of climate considerations in policy. By promoting data-driven research and analytical studies, it will support evidence-based decision-making and strengthen the implementation and periodic revision of the State Action Plan on Climate Change (SAPCC 2.0).

4.5 Recommendations for Cadre Strengthening and Realignment

To operationalize the proposed strategic architecture, a targeted strengthening and realignment of the technical cadre is imperative. The following recommendations are designed to staff the new divisions with the requisite expertise and capacity.

Establishing Senior Technical Leadership: The Additional Director

To bridge the critical "Leadership Gap," it is recommended to create a new senior leadership post of **Additional Director**. This position is the cornerstone of the proposed reform. The Additional Director will function as the professional head of the entire technical wing, overseeing the four new divisions and acting as the crucial bridge between the executive leadership of the Director and the scientific staff. This role will provide high-level technical oversight, guide and mentor the technical teams, and lead contributions to policy formulation, thereby institutionalizing long-term planning and innovation.

Augmenting Core Scientific and Engineering Cadres

To provide expert leadership within the new divisions, it is essential to augment the senior scientific cadre. It is proposed to add **one post of Environmental Scientist**, bringing the total to three. These scientists, along with the existing Environmental Programme Manager and Environmental Engineer, will form the technical core of the divisional leadership, providing specialized guidance in climate policy, wetland ecology, and coastal engineering.

Strengthening Regulatory and Field Operations

To build the operational capacity of the divisions, it is proposed to augment the cadres of Environmental Officer and Assistant Environmental Officer. This includes the addition of **four posts of Environmental Officer** (for a total of six) and **eight posts of Assistant Environmental Officer** (for a total of ten). These officers will form the operational workforce for the divisions, responsible for the high volume of essential tasks such as application scrutiny, site inspections, data collection, compliance monitoring, and preparation of technical reports for the statutory authorities.

Special Note: It may be noted that the Government has sanctioned one post of Environmental Officer and two posts of Assistant Environmental Officer for the SEIAA through GO(Rt.) No.11/2023/ENVT dated 17.02.2023. **The proposed augmentation of these cadres is inclusive of these positions**, with the recommendation these posts may be absorbed into the newly proposed Impact Assessment Division.

Creating a Geospatial Intelligence Capability: The GIS Specialist

The Directorate of Environment and Climate Change (DoECC) serves as the secretariat to multiple statutory authorities of the State namely the Kerala Coastal Zone Management Authority (KCZMA), State Environment Impact Assessment Authority (SEIAA), and State Wetland Authority Kerala (SWAK). All these institutions rely extensively on spatial data interpretation, mapping, and geospatial analysis for regulatory scrutiny, environmental appraisal, and scientific planning & decision making. At present, the absence of a dedicated permanent GIS Specialist has led to operational limitations in timely data processing, environmental monitoring, and effective integration of GIS-based decision support systems. Considering that spatial analysis forms the backbone of environmental regulation from delineation of ecologically sensitive areas and appraisal of project sites to compliance monitoring and policy formulation the need for an in-house, technically qualified GIS professional is indispensable. The recurring, specialized, and cross-cutting nature of GIS requirements across these statutory authorities demands institutional continuity and technical expertise that cannot be ensured through contractual or temporary arrangements. Establishing **a permanent post of GIS Specialist** will not only strengthen the scientific and analytical capacity of the DoECC and its allied authorities but also enhance transparency, accuracy, and evidence-based decision-making in environmental governance.

Building the Operational Support Backbone: The Technical Assistants

To ensure that senior technical staff can focus on high-level analysis and decision-making, it is crucial to build a strong operational support layer. It is recommended to create **ten posts of Technical Assistant**. This cadre is designed to provide primarily technical support. Their duties will include preliminary technical scrutiny of applications against established checklists, collation and formatting of field data, maintenance of technical databases (e.g., clearance applications, monitoring data), and preparation of preliminary data summaries for senior officers. This role establishes a formal entry-level tier for science graduates (with a Bachelor's degree in any Science, with weightage to Environmental Science), creating a structured career progression pathway and building a long-term talent pipeline for the department.

The proposed staffing pattern is derived by mapping the existing workload (Table 4.3) to the new functional divisions. Effectively, Table 4.3 represents the 'Demand', while Table 4.4 outlines the corresponding 'Supply Plan'. The following consolidated statement details how the total annual workload of 49,560 man-hours translates into specific Full-Time Equivalent (FTE) requirements for each new division.

Table 4.4: Workload-Based Staffing Allocation Matrix

Proposed Division	Key Workload Drivers	Standardized Annual Man-Hours	Staff Required (FTE) (Hours ÷ 1600)	Proposed Staff
Impact Assessment (SEIAA)	Statutory Scrutiny: Preliminary Scrutiny of EC Applications, EMP, Mining Plans & DSR Legal Defence: Preparation of SoF/ Instructions & Counter Affidavits Compliance: Verification of Half-Yearly Compliance Reports & Complaints	17,450	10.90	11
Coastal Zone (KCZMA)	CRZ Clearance: Technical Scrutiny of Applications & Checklists Field Duties: Site Inspections based on Court Directions/KCZMA Decisions Legal: Technical Inputs for NGT/ High Court Cases & Standing Counsel Meetings	11,180	6.98	7
Env. Education, Planning & Climate Change	Climate Cell: GHG Inventory, CN-50 Pathway, & Stakeholder Consultations Schemes: Bhoomithrasena/ Paristhithikam (Scrutiny, Report Evaluation & Grant Disbursement) R&D: Project Proposal Screening & Monitoring of Fellowships	11,350	7.09	7
Wetlands (SWAK)	Wetland Notification: Review of Brief Documents & Boundary Demarcation Implementation: IMPs Revision, Writing & Finalization Field: Consultations with LSGs & Ground-truthing	9,580	5.98	6
Leadership & Central Pool	Leadership: Overall Department Administration, Policy & State Nodal Coordination. Technical Support: Geospatial analysis (GIS) for all divisions.	--	--	2
GRAND TOTAL		49,560	30.95	33

4.6 Proposed Organizational Structure and Manpower Allocation

The implementation of these recommendations will create a resilient, accountable, and functionally specialized organization.

The Integrated Reporting Framework

The proposed structure introduces a clear operational hierarchy. The new Additional Director will report directly to the Director and will serve as the reporting officer for the heads of the four technical divisions. The proposed structure introduces a clear operational hierarchy where the new Additional Director reports directly to the Director and serves as the reporting officer for the technical leadership. While the Impact Assessment, Coastal, and Wetlands divisions will each be led by a single Divisional Head—the senior-most Scientist or Engineer—the Environmental Education, Climate Change and Planning Division will operate with a dual-leadership structure to accommodate its distinct mandates and the equivalent rank of its senior officers. Specifically, the Environmental Programme Manager will serve as the functional head of the Environmental Education and Planning Section, and the Environmental Scientist will serve as the functional head of the Climate Change & Research Section, with both officers reporting directly to the Additional Director. However, it is provided that in cases where administrative issues arise or unified coordination is required, the senior-most officer between the Environmental Programme Manager and the Environmental Scientist shall function as the Divisional Head. All other technical staff will report to the specific Section Head or Divisional Head under whom their work is allocated, ensuring a clear chain of command. All staff remain under the ultimate administrative control of the Director, DoECC, reinforcing the Directorate's role as the central coordinating body.

The consolidated proposal for cadre strengthening is presented in Table 4.5.

Table 4.5: Consolidated Cadre Strength: Existing vs. Proposed

Cadre/Position	Existing Strength	Proposed Additions	Proposed Total Strength
Additional Director	0	+1	1
Environmental Programme Manager	1	0	1
Environmental Engineer	1	0	1
Environmental Scientist	2	+1	3
GIS Specialist	0	+1	1
Environmental Officer	2	+4	6
Assistant Environmental Officer	2	+8	10
Technical Assistant	0	+10	10
Total	8	+25	33

Note: The 'Existing Strength' refers to the permanent cadre strength. The positions of 1 Environmental Officer and 2 Assistant Environmental Officers sanctioned via G.O. (Rt.) No.11/2023/ENVT are currently filled on a contract basis and are included in the 'Proposed Additions' column for regularization/absorption into the permanent cadre. It is noted that 1 GIS Specialist and 2 Technical Assistants are currently engaged on a contractual basis (as detailed in Chapter VII, Table 7.1). This proposal recommends creating permanent posts for these roles.

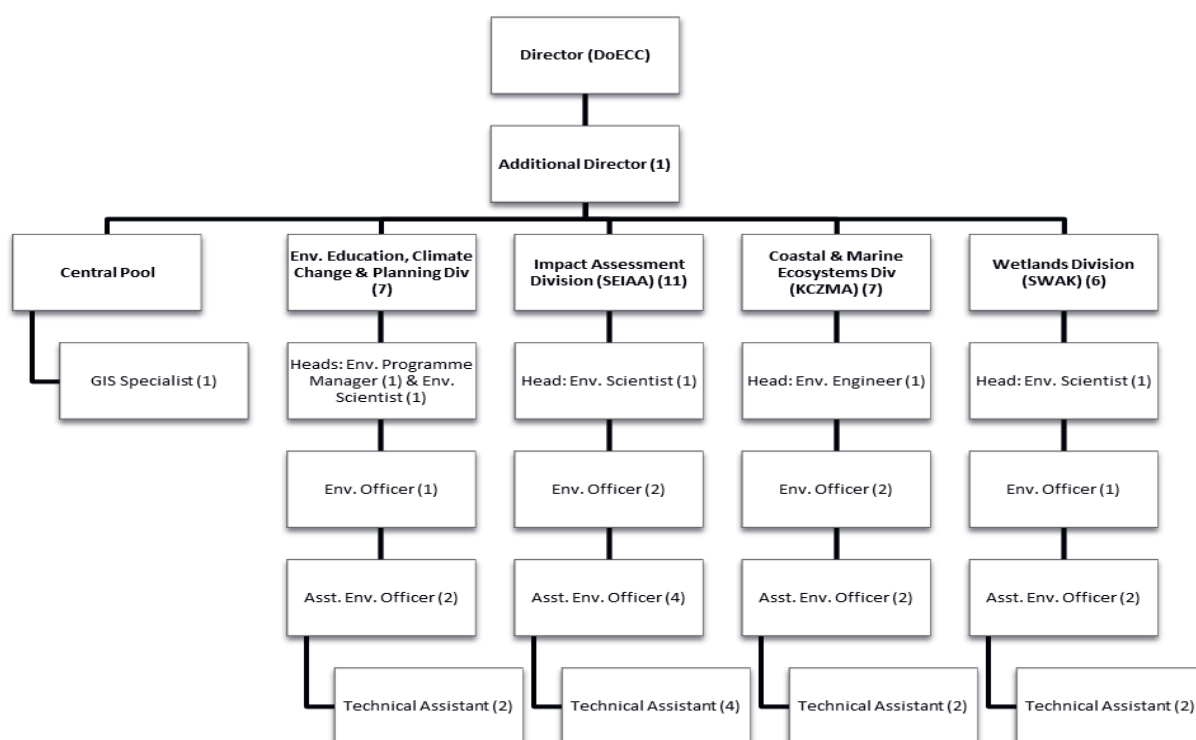
The proposed allocation of this enhanced manpower across the new thematic divisions is detailed in Table 4.6. This framework demonstrates the practical implementation of the reorganization, ensuring that the Directorate's core functions are protected while providing dedicated, expert support to each statutory body.

Table 4.6: Proposed Allocation of Manpower across Thematic Divisions

Position	Central Pool	Environmental Education, Climate Change and Planning Division	Impact Assessment Division (for SEIAA)	Coastal & Marine Ecosystems Division (for KCZMA)	Wetlands Division (for SWAK)	Total
Addl. Director	1	-	-	-	-	1
Env. Programme Manager	-	1	-	-	-	1
Env. Engineer	-	-	-	1	-	1
Env. Scientist	-	1	1	-	1	3
GIS Specialist	1*	-	-	-	-	1
Env. Officer	-	1	2	2	1	6
Asst. Env. Officer	-	2	4	2	2	10
Technical Assistant	-	2	4	2	2	10
Total	2	7	11	7	6	33

Note: The GIS Specialist will be attached to the Central Pool to function as a shared resource providing analytical support to all four divisions.

Fig. 4.1: Reporting and Supervisory Relationship of Technical Cadre



4.7 Job Descriptions for Proposed and Restructured Positions

To ensure role clarity within the new structure, the following job descriptions are proposed.

Additional Director

Role Summary: The professional head of the technical wing, responsible for providing strategic direction, technical oversight, and mentorship to all scientific and engineering staff. Acts as the primary technical advisor to the Director.

Key Responsibilities: Provide high-level technical leadership for all functions of the DoECC and its associated bodies; lead the strategic planning for the SAPCC; mentor and guide the Divisional Heads; chair technical review committees; act as the primary liaison with national scientific bodies.

GIS Specialist

Role Summary: Manages all geospatial data and utilizes mapping software to conduct spatial analysis, produce visualizations, and support evidence-based planning and decision-making across all departmental functions.

Key Responsibilities: Develop and maintain the department's geospatial database; create static and interactive maps for project appraisal, environmental monitoring, and public information; conduct spatial analyses to support EIAS, CRZ management, Wetland management and climate vulnerability and risk assessments; automate mapping and data processes using Python or ModelBuilder; collaborate with scientists and engineers to integrate GIS into all technical workflows.

Environmental Scientist

Role Summary: Provides core scientific expertise for policy development, research coordination, and technical appraisal within a designated division.

Key Responsibilities: Conduct research and data analysis to support SAPCC revision (Climate Change Div.); provide expert scientific input for the appraisal of complex EIA reports (Impact Assessment Div.); develop and manage ecosystem monitoring programs (Wetlands Div.); prepare technical reports and policy briefs.

Environmental Officer

Role Summary: An operational role responsible for implementing and enforcing environmental regulations and policies within a designated division.

Key Responsibilities: Scrutinize and process applications for EC (Impact Assessment Div.), CRZ Clearance (Coastal Div.), Wetland Clearance (Wetlands Div) and Scheme proposals (Education Div.); manage the implementation of state environmental schemes and grant-in-aid programmes; prepare agenda notes and technical summaries for statutory authority meetings; conduct site inspections to verify regulatory compliance and grant utilization; serve as a point of contact for project proponents and beneficiaries.

Assistant Environmental Officer

Role Summary: Provides critical field-level and file-processing support to the Environmental Officers and Scientists within a designated division.

Key Responsibilities: Conduct field visits to collect environmental data, ground-truthing inputs, and samples; perform preliminary scrutiny of regulatory applications and scheme proposals for completeness; assist in the coordination of stakeholder consultations and outreach programmes; assist in the preparation of technical reports and official correspondence; maintain case files and databases.

Technical Assistant

Role Summary: Provides foundational technical support to the AEOs and EOs, ensuring the smooth and efficient processing of technical files and data.

Key Responsibilities: Perform preliminary verification of applications against technical checklists; collate and digitize field data submitted by technical staff; maintain technical databases and record management systems; assist in preparing data summaries and presentations; act as a liaison between technical and administrative staff for file movement and record-keeping.

4.8 Summary of Key Recommendations

Based on the functional review and gap analysis, the following core recommendations are put forth to strengthen the technical wing of the Department of Environment & Climate Change and equip it for its modern mandate:

1. **Reorganize the technical wing** into four functionally specialized divisions: (i) Environmental Education, Climate Change & Planning, (ii) Impact Assessment, (iii) Coastal & Marine Ecosystems, and (iv) Wetlands. This will institutionalize expertise and permanently resolve the "hollowing out" of the Directorate.
2. **Create a new promotion post of Additional Director** to serve as the professional head of the technical wing, providing strategic oversight and bridging the gap between executive leadership and scientific staff.
3. **Increase the total sanctioned strength of the technical cadre from 8 to 33** to address the severe operational capacity gap and adequately staff the new divisions. This includes the creation of new posts and the augmentation of existing cadres as follows:

 Create 1 post of Additional Director

 Create 1 post of GIS Specialist.

 Create 10 posts of Technical Assistant.

 Add 1 post of Environmental Scientist (For a total of 3).

 Add 4 posts of Environmental Officer (For a total of 6).

 Add 8 posts of Assistant Environmental Officer (For a total of 10).

(Special Note: This proposed augmentation is inclusive of the one post of Environmental Officer and two posts of Assistant Environmental Officer already sanctioned through G.O. (Rt.) No.11/2023/ENVT dated 17.02.2023).

4. **Formally allocate the newly sanctioned staff** to the four divisions to serve as dedicated technical secretariats for the DoECC's core functions and for the statutory bodies (SEIAA, KCZMA, SWAK).

5. The positions of 1 Environmental Officer and 2 Assistant Environmental Officers currently sanctioned through G.O.(Rt.) No.11/2023/ENVT dated 17.02.2023 (presently recruited on contract basis) for SEIAA may be absorbed into the newly proposed Impact Assessment Division.

STRENGTHENING THE ADMINISTRATIVE AND FINANCIAL WINGS

5.1 Analysis of the Existing Ministerial System

The Department of Environment & Climate Change (DoECC) currently operates with a skeletal ministerial support structure that is increasingly insufficient for its expanding mandate. The entire ministerial team supporting the Directorate consists of only 11 personnel: 1 Administrative Officer, 1 Finance Officer, 1 Head Accountant, 1 Driver, 2 Clerks, 2 Lower Division Typists, 2 Office Attendants, and 1 Confidential Assistant.

These posts were originally sanctioned vide **G.O (Ms) No.06/2010/Envnt dated 18.12.2010**. Subsequently, entry-cadre appointments were brought under the purview of the Public Service Commission (PSC) vide **G.O (Ms) No.09/12/Envnt dated 05.06.2012**, which prescribed the method of appointment and qualifications.

The existing staff strength of the Administration and Finance Wings is detailed below:

Table 5.1: Existing Ministerial Staff Strength

Sl. No.	Name of Post	Sanctioned Posts	Mode of Appointment
1	Administrative Officer	1	By Transfer / Deputation (Jt. Sec.)
2	Finance Officer	1	By Transfer / Deputation (Under Sec.)
3	Head Accountant	1	By Transfer / Deputation (Head Clerk). Promotion from the post of Sr. Clerk
4	Clerk	2	By Direct Recruitment through PSC

Sl. No.	Name of Post	Sanctioned Posts	Mode of Appointment
5	Lower Division Typist	2	By Direct Recruitment through PSC
6	Confidential Assistant	1	By Direct Recruitment through PSC
7	Office Attendant (OA)	2	By Direct Recruitment through PSC
8	Driver	1	By Direct Recruitment through PSC
9	Part-Time Sweeper (PTS)	1	--

Functional Challenges

The Directorate's ministerial functions—ranging from establishment matters and accounts to file management for technical officers—are currently managed by just **two Clerks and two Typists**.

Blurred Roles: Due to the severe shortage of staff, the functional distinction between Clerks and Typists has eroded. Typists are currently engaged in original file work rather than their designated duties.

Overburdened Staff: These four individuals are required to support the entire Directorate, including the creation and maintenance of technical files for Scientists and Environmental Officers.

Lack of Support: The Office Attendants are frequently diverted to handle dispatch and tapal duties, leaving gaps in general office support.

Current Organizational Workflow

The Directorate's non-technical functions are broadly divided into two wings: **Administration** and **Finance & Accounts**.

Administration: Headed by the Administrative Officer (Joint Secretary rank, on deputation).

Finance: Headed by the Finance Officer (Under Secretary rank, on deputation).

Accounts Level: A Head Accountant (on deputation) handles the Cash Book, reconciliation, budget estimates, and audit replies. However, due to staff shortages, the Head Accountant is often forced to perform original clerical work rather than supervisory duties.

Sectional Distribution of Work

The current subject distribution organizes the work into four "seats" (E1 to E4), which is an ad-hoc arrangement:

Seat E1 (LD Typist): Handles training programs (Bhoomithrasena/Paristhithikam), Environment Day celebrations, and assists Environmental Scientist II with research fellowships and complaints.

Seat E2 (Senior Clerk): Manages establishment matters (recruitment, posting, service books), vehicle management, TA bills, and assists the Environmental Programme Manager with awareness schemes.

Seat E3 (LD Typist): Handles Finance & Accounts, Court Cases, Centrally Sponsored Schemes (CSS), and Administrative Reports.

Seat E4 (Clerk): Deals with salary, allowances, contingent bills, and purchase of stationery.

5.2 Workload Assessment and Supervisory Gaps

A detailed analysis of the ministerial workload reveals that the total volume of file processing and record-keeping requires approximately **10,365 man-hours annually**.

Justification for Staff Augmentation:

Applying the standard work-norm of **1,600 effective man-hours per annum** per staff member:

$10,365 \text{ hours} / 1,600 \text{ man hours} = 6.48 \text{ Full-Time Equivalents (FTEs)}$

While the baseline indicates a need for 7 Clerks (rounded up from 6.48 FTE), the Directorate requires 8 Clerks to ensure a balanced and resilient organizational structure. This increase is necessitated by the following strategic factors:

1. **Proportionality with Technical Expansion** In this Report, as part of strengthening the Department, it is recommended to expand the Technical Wing to 33 Technical Posts. When proposing such a significant expansion in technical capacity, the number of ministerial staff must be increased proportionately to avoid administrative bottlenecks. The existing skeletal staff cannot support a technical cadre of this size.
2. **Expanded Mandate and Institutional Continuity** The Directorate is responsible for planning, coordinating, and implementing policies aimed at environmental protection, climate resilience, and compliance with national and international directives. Over the past several years, this mandate has expanded significantly due to rising compliance requirements and the implementation of climate-focused schemes

Current Deficit: The Directorate currently lacks adequate permanent ministerial support for essential, recurring tasks such as file processing, record maintenance, and coordination. These functions are presently managed on an ad-hoc basis, which is neither efficient nor sustainable, leading to delays in program implementation.

Need for Permanence: The Directorate is required to submit periodic reports and data inputs to state and national agencies. Dedicated permanent clerical support is essential to ensure accuracy, timeliness, and institutional knowledge retention, which is not possible with temporary or outsourced arrangements.

3. **Structural Balance (The "Two-Wing" System)** To operate the proposed "Two-Wing" system effectively, the clerical strength must be distributed evenly:

General Section (Admin): 4 Clerks to handle establishment, vehicle, and coordination files.

Accounts Section: 4 Clerks to handle the growing volume of budget, treasury, and audit files.

This 4+4 structure ensures that neither wing becomes a choke point for the Department's workflow.

The Supervisory Vacuum

Crucially, the Directorate lacks a sanctioned post of **Senior Superintendent**, which is the standard supervisory post required for a Directorate-level establishment under the Manual of Office Procedure.

Operational Risk: In the absence of a Senior Superintendent, there is no intermediate supervisory chain between the Clerks and the Administrative Officer. This leads to bottlenecks in file movement and weak coordination.

Compliance Gaps: The lack of a dedicated supervisor compromises the monitoring of registers, service records, and audit compliance.

5.3 Recommendation: Restructuring the Administrative Architecture

To address these deficiencies and align with the proposed expansion of the Technical Wing, a comprehensive strengthening of the ministerial cadre is proposed.

Recommendation 1: Creation of a Unified Clerical Cadre

With the adoption of the e-Office system, the functional distinction between Clerks and Typists has become obsolete.

Proposal: Convert the **2 existing posts of Lower Division Typist** into **Clerks**.

Impact: This regularizes the current practice and creates a unified pool of dealing hands for file processing.

Recommendation 2: Establishment of Two Functional Wings

It is recommended to formally structure the ministerial staff into two distinct wings—**Administration** and **Finance & Accounts**—each with clear supervisory hierarchies.

(A) Administration Wing

This wing will handle establishment, housekeeping, general administration, and coordination.

Head of Wing: Administrative Officer (Existing).

Supervisory Level: A new post of **Senior Superintendent** is proposed to directly supervise the General Section, ensuring proper file scrutiny and office discipline. A new post of **Junior Superintendent** is also proposed to assist in supervision.

Staffing: The wing will be supported by **4 Clerks** (including the converted Typist posts), **Office Attendants**, and **Drivers**.

Note: The existing permanent Driver post should be re-designated as **Driver-cum-Office Attendant** to allow for flexible utilization.

(B) Finance & Accounts Wing

This wing will manage the budget, treasury transactions, audit, and plan fund releases.

Head of Wing: Finance Officer (Existing).

Drawing and Disbursing Officer (DDO): It is proposed that the **Finance Officer** be designated as the DDO for all Heads of Accounts under the Department.

Supervisory Level: The existing **Head Accountant** will directly supervise the Accounts Section.

Staffing: It is recommended to create **4 new posts of Clerk** for this section. These posts shall be strictly designated as Clerks and assigned to the Finance & Accounts section. One of these Clerks may be entrusted with the specific duties of Cashier for handling cash transactions and maintaining the Cash Book.

Recommendation 3: Formation of a Centralized Legal Cell

The Department faces a high volume of litigation in the National Green Tribunal (NGT) and High Court. Currently, scientific officers are forced to draft legal replies, which often lack statutory precision.

Proposal: Create a dedicated **Legal Cell** within the Directorate to serve the DoECC and its associated authorities (SEIAA, KCZMA, SWAK).

Staffing:

Legal Officer (Joint Secretary Rank): 1 Post. (To be filled by deputation from the Law Department).

Note: The existing post of Law Officer in SEIAA may be shifted and upgraded for this purpose.

Legal Assistant: 1 Post. (To be filled by deputation from the Law Department).

Recommendation 4: Office Support & Upkeep

Confidential Assistants: Create **1 additional post** of Confidential Assistant to be attached to the proposed Additional Director.

Part-Time Sweepers: Create **2 posts of Part-Time Sweeper (PTS)** under the Central Pool (on a contract basis) to ensure the upkeep of the Directorate and the shared office premises of the statutory authorities.

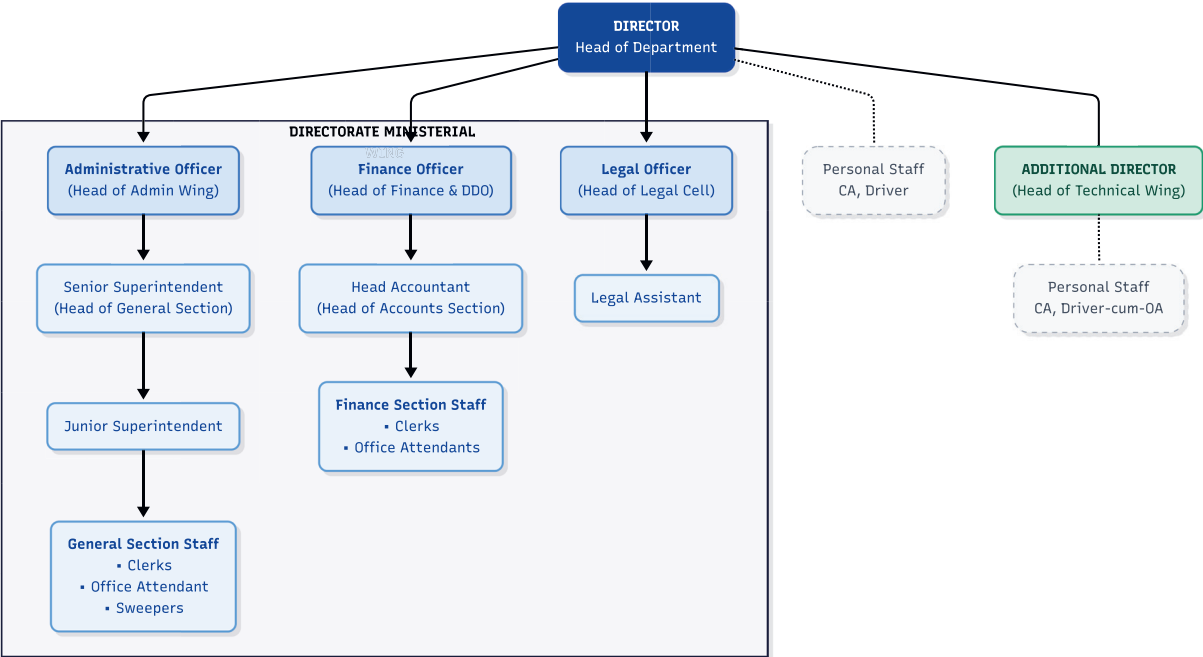
5.4 Proposed Staffing Pattern

The consolidated proposal for strengthening the Ministerial Wing is detailed below.

Table 5.2: Consolidated Proposal for Ministerial Wing

Name of Post	Existing Strength	Proposed Additions	Total Proposed	Remarks
Administrative Officer	1	0	1	Head of Admin Wing.
Finance Officer	1	0	1	Head of Finance Wing & DDO.
Legal Officer (Jt. Sec Rank)	0	+1	1	Heads Legal Cell (Deputation).
Senior Superintendent	0	+1	1	New Post. To supervise General Section (Admin Wing).
Junior Superintendent	0	+1	1	New Post. To assist in Admin Wing.
Head Accountant	1	0	1	To supervise Accounts Section.
Legal Assistant	0	+1	1	For Legal Cell.
Clerk	2	+4	6	4 New posts.
LD Typist (to be Clerk)	2	-2 (Convert)	0	Converted to Clerks.
Total Clerical Strength	4	+4	8	Meets the workload requirement.
Confidential Assistant	1	+1	2	1 Existing + 1 New for Addl. Director.
Office Attendant	2	0	2	Existing posts.
Driver / Driver-cum-OA	1	+1	2	1 Existing + 1 New for Addl. Director.
Part-Time Sweeper	1	+1	2	Contract basis (Central Pool).
Total Ministerial Staff	12	+11	23	Excludes the Director

Fig 5.1: Proposed Organizational Structure of the Department's Ministerial Wing (Administration, Finance, and Legal Cell)



RESOLVING THE FUNCTIONAL DEFICIT IN STATUTORY AUTHORITIES

6.1 Analysis of the Core Problem: "Borrowed Capacity"

The primary structural weakness of Kerala's environmental governance framework is the complete functional dependency of its statutory authorities—SEIAA, KCZMA, and SWAK—on the core technical staff of the DoECC. These legally empowered bodies have been established without any permanent technical staff of their own.

This "borrowed capacity" model, where DoECC officers are assigned on a "working arrangement" or "part-time basis," has created a systemic crisis:

Failure of Statutory Duties: The authorities are unable to perform their legally mandated functions in a timely manner, leading to project delays, weak enforcement, and legal challenges.

Crippling of the Directorate: The DoECC's own strategic work, particularly on the State Action Plan on Climate Change, is compromised as its key technical officers are perpetually co-opted for the routine work of the authorities.

Financial Mismanagement: The inability to execute programs has led to the gross under-utilization of state and central funds, especially within SWAK.

Existing Staffing of Statutory Authorities

The current staffing model is a patchwork of deputation, contract staff, and "working arrangements" from the Directorate, which highlights the lack of a permanent, dedicated establishment. The existing *ministerial and administrative support staff* strength across the three bodies is as follows:

Table 6.1 Existing Ministerial & Support Staff of Statutory Authorities:

Authority	Name of Post	Number	Mode of Appointment
SEIAA	Ministerial Staff		
	Administrator	1	On Deputation
	Finance Officer	1	On Deputation
	Legal Officer	1	On Deputation
SEIAA	Section Officer	1	On Deputation
	Assistants	2	On Deputation
	Office Attendant	2	On Contract
KCZMA	Ministerial & Support Staff		
	Additional Secretary	1	On Deputation from Secretariat
	Section Officer	1	On Deputation from Secretariat
	Assistants	2	On Deputation from Secretariat
	Data Entry Operators	3	Contract / Daily Wage
	Office Attendant	1	On Contract
SWAK	Ministerial & Support Staff		
	Data Entry Operator	1	On Contract

6.2 The Strategic Solution: A Unified, Directorate-Led Support Structure

Creating small, independent staff structures within each authority would be inefficient and would perpetuate silos. The logical solution is to empower the Directorate to provide dedicated, full-time support through a specialized internal structure.

Recommendation 1:

Implement the Thematic Division Model for Technical Support: The technical and scientific support for the statutory authorities will be provided exclusively by the new, functionally specialized divisions created within the Directorate:

The **Impact Assessment Division** will serve as the full-time technical secretariat for **SEIAA**.

The **Coastal & Marine Ecosystems Division** will serve as the full-time technical secretariat for **KCZMA**.

The **Wetlands Division** will serve as the full-time technical secretariat for **SWAK**.

This model resolves the "borrowed capacity" problem permanently, institutionalizes expertise within the Directorate, and ensures that both the statutory authorities and the DoECC can fulfill their respective mandates.

Recommendation 2:

Provide Dedicated Ministerial Staff to Each Authority: While technical support is centralized in the Directorate, the statutory authorities require their own dedicated administrative and ministerial staff to function independently on a day-to-day basis. The following ministerial structures are recommended:

Table 6.2 Proposed Administrative Wing for SEIAA:

Name of Post	Proposed Strength	Mode of Appointment
Administrator	1	On Deputation
Finance Officer	1	On Deputation
Section Head	1	On Deputation
Clerical Staff / Assistants	4	On Deputation
Office Attendant	2	On Contract basis through Employment Exchange

Table 6.3 Proposed Administrative Wing for KCZMA:

Name of Post	Proposed Strength	Mode of Appointment
Addnl. Secretary	1	On Deputation from Secretariat
Section Officer	1	On Deputation from Secretariat
Assistants	2	On Deputation from Secretariat
Office Attendant	1	On Contract basis through Employment Exchange

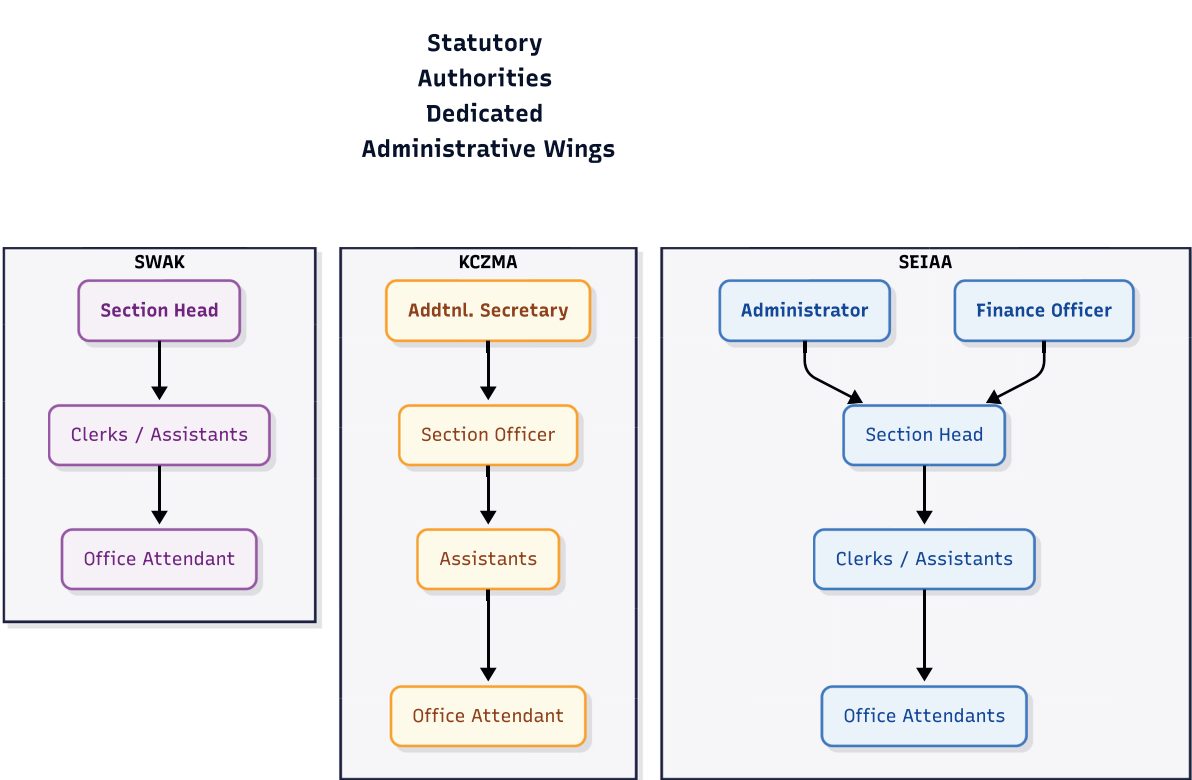
Table 6.4 Proposed Administrative Wing for SWAK:

Name of Post	Proposed Strength	Mode of Appointment
Section Head	1	On Deputation
Clerical Staff / Assistants	2	On Deputation
Office Attendant	1	On Contract basis through Employment Exchange

Note: The services of the Administrative Officer and Finance Officer of DoECC may be extended to SWAK to head its Administrative and Finance Wing.

Note on Post Nomenclature and Cadre Status: The designations utilized in the proposed administrative structures are intended to denote the functional responsibilities and the equivalent rank required for these roles. Where these titles correspond to specific encadred posts, this proposal does not seek to alter their existing cadre status or encadrement rules. Rather, these functional positions are to be filled by drawing eligible officers of equivalent rank and scale on deputation from the Government Secretariat or other relevant State Government Departments, strictly in accordance with prevailing service rule

Fig 6.1: Proposed Hierarchy for Statutory Authorities (SEIAA, KCZMA, and SWAK)



ANALYSIS OF CONTRACTUAL AND PROJECT- BASED STAFF

7.1 The Role of Agile Support Staff

In addition to the permanent technical cadre, the Department of Environment & Climate Change and its associated statutory bodies (KCZMA, SWAK, and SEIAA) rely on a crucial contingent of staff engaged on a contractual or project basis. This personnel category provides essential technical, administrative, and data management support, enabling the core technical officers to focus on their primary regulatory, scientific, and strategic functions. An analysis of this support structure is vital for ensuring operational stability and efficiency.

7.2 Current Strength of Contractual and Project Staff

A review of the existing contractual staff across the DoECC and its associated bodies reveals a diverse team fulfilling a range of functions, from scientific assistance to office administration. The current distribution of these positions is detailed in Table 7.1.

Table 7.1: Existing Contractual and Project Staff across DoECC and Associated Bodies

Entity	Designation	Number of Staff
DoECC	Project Scientist	1
	GIS Specialist	1
	BMC Programme Coordinator	1
KCZMA	Data Entry Operator	3
	Office Attendant	1
SWAK	Project Scientist	1
	Wetland Specialist	1
	Project Assistant	2
SEIAA	Environmental Officer	1
	Assistant Environmental Officer	2
SEIAA	Project Assistant	4
	Technical Assistant	2
	Data Entry Operator	2
	Office Assistant	1
	Office Attendant	2
	Casual Sweeper	1

Special Note:

It may be noted that the GIS Specialist and the Technical Assistants listed above are currently engaged on a contractual basis. As detailed in Chapter IV of this report, it is strongly recommended that these specific, high-value technical posts be made permanent and absorbed into the regular cadre of the Department to build long-term institutional capacity.

The one Environmental Officer and two Assistant Environmental Officers sanctioned through G.O.(Rt.) No.11/2023/ENVT dated 17.02.2023 may be absorbed to the regular cadre as detailed in Chapter IV.

7.3 Recommendations for Contractual and Project Staff

To maintain operational effectiveness and enhance the value derived from project-based engagements, the following recommendations are proposed.

Recommendation 1: Continuation and Rationalization of Contractual Appointments

It is recommended that the existing scientific, technical, and project-specific contractual positions across the DoECC, KCZMA, SWAK, and SEIAA be continued, excluding those specific posts recommended for permanent absorption.

Justification: These roles provide an indispensable layer of operational support. The scientific and project assistance staff manage a high volume of essential tasks that would otherwise consume

the limited time of the permanent scientific and engineering officers. This model provides the department with the necessary operational flexibility to manage fluctuating workloads and specific project demands in a cost-effective manner, ensuring that the core functions of environmental governance are not impeded.

Rationalization of Administrative Support Roles: The administrative contractual roles must be rationalized to align with the new structural proposals. The current engagement of Data Entry Operators should be viewed as an interim measure to handle the existing administrative workload. These specific positions may be ceased as and when the proposed deputed administrative staff (Clerks/Assistants) join the respective statutory authorities. The services of the Office Attendants, however, shall be continued on a contract basis through the Employment Exchange to provide essential office support, strictly in alignment with the proposed administrative structures detailed in Chapter VI.

Recommendation 2:

Establishing a Minimum Three-Year Term for Project Fellows

It is recommended that all future recruitments for project-based scientific and technical roles, such as Project Fellows and Project Assistants, be for a minimum tenure of three years.

Justification: The current practice of short-term, often annual, appointments for project staff creates significant operational disruption. It leads to high turnover, a constant loss of institutional knowledge, and a recurring need for training new personnel. A minimum three-year engagement period will ensure project continuity, particularly for multi-year research and monitoring initiatives. This extended tenure allows project fellows to develop deeper subject matter expertise, contribute more meaningfully to their assigned projects, and provides the department with a far greater return on its investment in their training and professional development. This strategic shift will build a more stable, experienced, and effective project support team.

8

CHAPTER

CONSOLIDATED RECOMMENDATIONS & CONCLUSION

Summary of Key Recommendations:

Restructure the Technical Wing: Reorganize the technical wing into four specialized divisions: (i) Environmental Education, Climate Change & Planning, (ii) Impact Assessment, (iii) Coastal & Marine Ecosystems, and (iv) Wetlands

Strengthen Technical Cadre: Increase the total technical strength from **8 to 33**, creating a new leadership post of **Additional Director** and adding essential Scientists, Officers, and a GIS Specialist.

Strengthen Administrative Support: Fortify the Directorate's ministerial wing by increasing its strength from **11 to 23** and establish dedicated administrative wings for SEIAA, KCZMA, and SWAK with staff on deputation.

Establish a Legal Cell: Create a centralized Legal Cell within the Directorate, headed by a Legal Officer, to provide expert legal support to the department and all its associated bodies.

Adopt a Unified Technical Support Model: The new technical divisions within the Directorate will serve as the dedicated secretariats for the statutory authorities (SEIAA, KCZMA, SWAK), thus ending the unsustainable "borrowed capacity" model.

RECOMMENDATIONS FOR OUTREACH AND CAPACITY BUILDING

Beyond the core restructuring of the Directorate, the following strategic initiatives are recommended to extend the department's reach, build field-level coordination, and enhance its institutional capacity.

1. Introduce a Climate Resilience Fellowship Programme:

To build a pipeline of future talent and extend the department's operational reach, it is recommended to introduce a fellowship programme. This programme would consist of 20 Fellows. These fellows would be deputed for state-level and district-level coordination of DoECC activities, acting as a crucial link between the Directorate and local implementation. To attract high-quality candidates, the fellowship should offer an attractive stipend of Rs. 35,000 per month or more.

2. Establish State and District Level Coordination Committees

The DoECC's mandate requires extensive inter-departmental coordination at the field level. It is recommended to create a formal structure for this:

District-Level Core Committee: A committee may be formed in each district under the Chairmanship of the District Collector. Key members should include the respective district Joint Director of LSGI, Tahsildars, LSGI Secretaries, Village Officers, Officers from Forest Department, Members from KSPCB and KSBB. An official from DoECC nominated on behalf of the Director, DoECC

shall serve as the Convenor for these committees, which will be responsible for field-level tracking and coordination of environmental and climate change activities.

State-Level Coordination Committee: A corresponding State-Level Committee should be formed to oversee and coordinate the activities of the District-Level Committees, ensuring alignment with state policy.

3. Enhance Institutional Capacity through State Training Policy (STP):

To ensure the continuous professional development of all officials (both technical and ministerial) in the department, it is recommended that the Department of Environment & Climate Change be brought under the umbrella of the State Training Policy (STP). This would provide a formal mechanism for imparting regular, high-quality capacity building

PROJECTED FINANCIAL COMMITMENT AND RESOURCE SUSTAINABILITY

The restructuring proposals outlined in this report are designed to transform the Department of Environment & Climate Change into a scientifically and administratively efficient entity. While the creation of new posts entails a financial commitment, it is an essential investment to ensure the Department can effectively manage its statutory mandates, utilize plan funds efficiently, and avoid the legal repercussions of non-compliance.

The financial implication is analyzed under two heads: the Technical Wing and the Administrative/Ministerial Wing. The projection is based on the **2019 Pay Revision Scales** currently in force.

Pay Basis: 11th Pay Revision (2021) Scales.

DA Rate: 22% (Admissible Rate).

HRA Rule: 10% of Basic Pay, subject to a maximum of **₹10,000/month**.

Basis of Calculation:

Basic Pay: Minimum of the Scale (Entry Level).

Gross Salary Formula: Basic Pay + DA (22%) + HRA (10% or ₹10,000, whichever is lower).

Table 10.1: Annual Financial Commitment for Creation of 25 New Posts (Technical Wing)

Sl. No.	Name of Post to be Created	No. of Posts	Scale of Pay (₹) (2021 PR)	Basic Pay (Min)	DA (22%)	HRA (Capped)	Gross Monthly (Per Post)	Total Annual Liability (₹)
1.	Additional Director	1	1,12,800 – 1,63,400	1,12,800	24,816	10,000	1,47,616	17,71,392
2.	Environmental Scientist	1	1,07,800 – 1,60,000	1,07,800	23,716	10,000	1,41,516	16,98,192
3.	GIS Specialist	1	51,400 – 1,10,300	51,400	11,308	5,140	67,848	8,14,176
4.	Environmental Officer	4	56,500 – 1,18,100	56,500	12,430	5,650	74,580	35,79,840
5.	Asst. Env. Officer	8	51,400 – 1,10,300	51,400	11,308	5,140	67,848	65,13,408
6.	Technical Assistant	10	35,600 – 75,400	35,600	7,832	3,560	46,992	56,39,040
	TOTAL NEW POSTS	25						2,00,16,048

Table 10.2: Annual Financial Commitment for Creation of 11 New Posts (Ministerial Wing)

Sl. No.	Name of Post	No. of New Posts	Scale of Pay (₹)	Basic Pay (₹)	D.A. @ 22% (₹)	H.R.A. @ 10% (₹)	Monthly Gross Salary (Per Post) (₹)	Total Annual Commitment (₹)
1	Legal Officer (Jt. Sec. Rank)	1	85,000 - 143,600	85,000	18,700	8,500	1,12,200	13,46,400
2	Senior Superintendent	1	51,400 - 110,300	51,400	11,308	5,140	67,848	8,14,176
3	Junior Superintendent	1	43,400 - 91,200	43,400	9,548	4,340	57,288	6,87,456
4	Legal Assistant	1	39,300 - 83,000	39,300	8,646	3,930	51,876	6,22,512
5	Clerk	4	26,500 - 60,700	26,500	5,830	2,650	34,980	16,79,040 (for 4 posts)
6	Confidential Assistant	1	27,900 - 63,700	27,900	6,138	2,790	36,828	4,41,936
7	Driver-cum-OA	1	25,100 - 57,900	25,100	5,522	2,510	33,132	3,97,584
8	Part-Time Sweeper	1	13,000 - 21,080	13,000	2,860	1,300	17,160	2,05,920
	Total	11						₹ 61,95,024

Table 10.3: Annual Financial Commitment for Creation of 5 New Posts (Ministerial Wing)

Sl. No.	Authority	Name of Post	No. of New Posts	Scale of Pay (₹)	Basic Pay (₹)	D.A. @ 22% (₹)	H.R.A. @ 10% (₹)	Monthly Gross Salary (Per Post) (₹)	Total Annual Commitment (₹)
1	SEIAA	Assistant	2	39,300 - 83,000	39,300	8,646	3,930	51,876	12,45,024
2	SWAK	Section Officer (Section Head)	1	51,400 - 110,300	51,400	11,308	5,140	67,848	8,14,176
3	SWAK	Assistant	2	39,300 - 83,000	39,300	8,646	3,930	51,876	12,45,024
		Total	5						₹ 33,04,224

Consolidated Financial Abstract

The total additional annual financial commitment required for the complete restructuring of the Directorate (Technical & Ministerial) and its Statutory Authorities is summarized below.

Table 10.4: Grand Total of Annual Financial Implication

Sl. No.	Component	No. of New Posts	Annual Financial Liability (₹)
1	Technical Wing (New Divisions)	25	2,00,16,048
2	Ministerial Wing (Directorate)	11	61,95,024
3	Statutory Authorities	5	33,04,224
	GRAND TOTAL	41	₹ 2,95,15,296

Cost-Benefit Analysis: Revenue Generation vs. Expenditure

To assess the viability of this proposal, it is crucial to analyze the Department's financial performance. A review of the non-tax revenue generated by the Directorate of Environment & Climate Change over the past years demonstrates a consistent upward trajectory, despite functioning with a skeletal staff.

Table 10.5: Income Generated by DoECC (2019-2025)

Financial Year	Income Generated (₹)
2019-2020	6,83,06,849
2020-2021	4,05,33,860
2021-2022	2,90,16,500
2022-2023	4,49,74,693
2023-2024	4,81,33,460
2024-2025	5,56,00,000

Justification for Investment

The data reveals that in the 2024-25 fiscal year alone, the Directorate and statutory authorities generated approximately ₹5.56 Crores. This revenue primarily stems from scrutiny fees, environmental clearance processing fees, and other statutory charges.

Positive ROI: The proposed additional financial liability for restructuring is approximately ₹2.95 Crores. This is significantly lower than the annual revenue already being generated by the Department (₹5.56 Crores). Effectively, the Department is already self-sustaining, and the cost of strengthening it can be comfortably met from its own internal revenue generation.

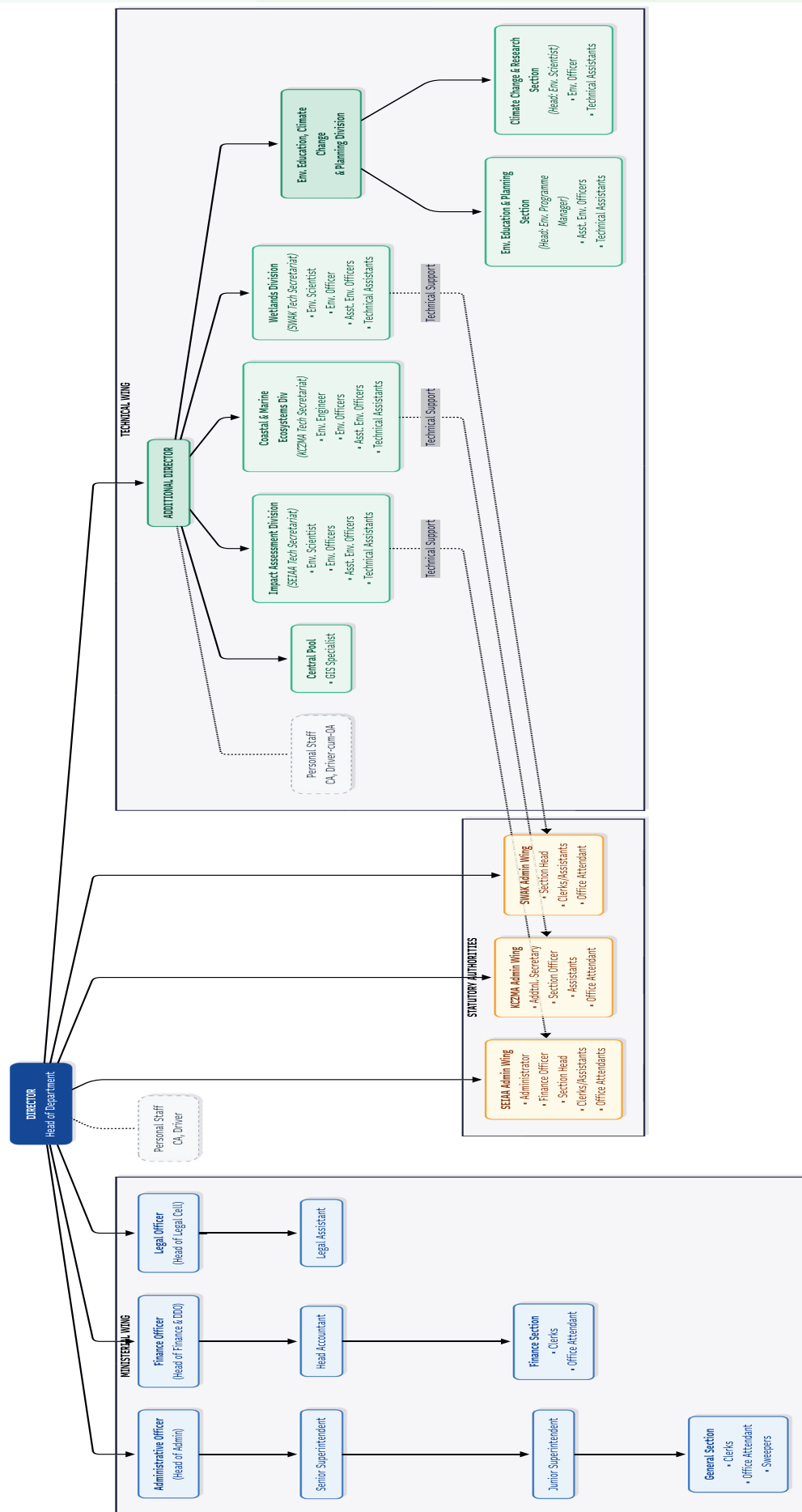
Unlocked Potential: It is pertinent to note that this revenue was generated with a severe shortage of technical and ministerial staff. The current "borrowed capacity" model hampers the speed of file processing, limits the volume of project applications that can be scrutinized, and delays fee collection.

Future Projection: By sanctioning the proposed 41 new posts, the Department will be able to clear backlogs, process applications faster, and enforce compliance more strictly. It is projected that with a full-fledged organizational structure, the Department's annual revenue generation could significantly increase, far outstripping the marginal cost of these new salaries.

Conclusion

The restructuring proposal is not merely an expenditure but a strategic investment. The creation of these posts is financially viable, operationally necessary, and will result in a net-positive revenue impact for the State Exchequer while ensuring sustainable environmental governance for Kerala.

Proposed Master Organizational Architecture of the Department of Environment and Climate Change (Integrating Technical, Ministerial, and Statutory Wings)



PROPOSED DRAFT SPECIAL RULES

**Scientific State Service
Scientific Subordinate Service**

Draft Special Rules - Scientific State Service

GOVERNMENT OF KERALA

Environment () Department

NOTIFICATION

G.O. (P) No. / / Dated, Thiruvananthapuram..... / /

S.R.O.No.

In exercise of the powers conferred by sub – section (1) of section 2 of the Kerala Public Services Act, 1968 (19 of 1968) read with section 3 thereof and in supersession of all the existing rules and orders regarding Kerala Environment and Climate Change State Service, the Government of Kerala hereby make the Special Rules for the Kerala Environment and Climate Change Scientific State Service.

RULES

1. Short title and commencement.

- (1) These Rules may be called “The Kerala Environment and Climate Change Scientific State Services Special Rules, 2025”
- (2) These Rules shall be applicable to all persons appointed to all categories of Scientific posts fall under the Environment and Climate Change State Service under Department of Environment and Climate Change.
- (3) They shall come into force at once

2. Constitution: -

- 2.1 The Kerala Environment and Climate Change Scientific State Service shall consists of the following Groups and Categories of officers namely:-

Table I

Category	Name of Post	Appointing Authority
(1)	(2)	(3)
SCIENTIFIC STATE SERVICE		
1	Director	Government
2	Additional Director (Proposed New Post)	Government
3	Environmental Programme Manager	Government
4	Environmental Engineer	Government
5	Environmental Scientist	Government
6	Environmental Officer	Government
7	Assistant Environmental Officer	Director
8	GIS Specialist (Proposed New Post)	Director

3. Method of Appointment

- 3.1 Appointment to the posts included in the various categories of posts shall be made by the Appointing Authority as follows in the column (3) of the Table of I given above:

4. Qualifications: -

- 4.1 No person shall be eligible for appointment to the category mentioned in column (1) of the Table II given below by the method specified in column (3), unless he / she possess the qualifications prescribed in the corresponding entry in column (4) thereof :-

Table II

Category No.	Name of Post	Method of Appointment	Qualifications
(1)	(2)	(3)	(4)
STATE SCIENTIFIC SERVICE			
1	Director	<p>By appointment from All India Service Officers of the category Indian Administrative Service or Indian Forest Service.</p> <p>In the absence of item (i) above, by promotion of qualified hand from a select list of category 2</p> <p>In the absence of qualified persons in item (i) and (ii) Direct Recruitment</p>	<p>Qualifications prescribed for appointment to the All India Service Officers of the category Indian Administrative Service or Indian Forest Service.</p> <p>By Promotion and Direct Recruitment Master's Degree with not less than 55% marks through a regular programme in Environmental Science or Environment Management or Environmental Science and Management or Environmental Engineering or Environmental Technology from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala. Ph.D. awarded by a UGC/AICTE recognized University / National Institute established by the Government of India or Institution established by the Government of Kerala in the above subjects. Minimum 5 years' experience in research activities / teaching / project management in government / quasi-government, government aided institutions in environmental subjects. For Promotion: Must have completed a minimum of 3 years of regular service in the post of Additional Director..</p>

2	Additional Director (Proposed post)	<p>By promotion of qualified hand from a combined select list of categories (3), (4) and (5).</p> <p>In the absence of qualified persons in item (i) above, by direct recruitment.</p>	<p>By Promotion</p> <p>Master's Degree with not less than 55% marks through a regular programme in Environment Management / Environmental Science and Management / Environmental Science from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.</p> <p>OR</p> <p>Master's Degree with not less than 55% marks through a regular programme in Environmental Engineering or Environmental Technology from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.</p> <p>Desirable</p> <p>Ph.D. awarded by a UGC/AICTE recognized University / National Institute established by the Government of India or Institution established by the Government of Kerala in the above subjects.</p> <p>Total service of 5 years' experience in Category 3, 4 or 5</p> <p>By Direct Recruitment</p> <p>Master's Degree with not less than 55% marks through a regular programme in Environment Management / Environmental Science and Management / Environmental Science from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.</p> <p>2. Ph.D. awarded by a UGC/AICTE recognized University / National Institute established by the Government of India or Institution established by the Government of Kerala in the above subjects.</p> <p>3. Total service of 10 years' experience in any other Scientific Departments under Government of Kerala in the identical time scale posts of categories (3) and (5).</p>
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3	Environmental Programme Manager	<p>By Promotion of qualified hand from a select list of Category (6)</p> <p>In the absence of qualified persons in item (i) above, by promotion of qualified persons from Category (7).</p> <p>In the absence of qualified persons in items (i) and (ii) above, by direct recruitment.</p>	<p>By Promotion</p> <p>Master's Degree with not less than 55% marks through a regular programme in Environment Management / Environmental Science and Management / Environmental Science from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.</p> <p>An experience of total service of 5 years in Category 6 or a total service of 5 years in Category 6 & 7 together.</p> <p>By Direct Recruitment</p> <p>Master's Degree with not less than 55% marks through a regular programme in Environment Management / Environmental Science and Management / Environmental Science from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.</p> <p>Minimum 5 years' experience in research activities or teaching or project management in government or quasi-government, government aided institutions in environmental subjects.</p> <p>Desirable: Ph.D. awarded by a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala in any of the above subjects.</p>
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4	Environmental Engineer	<p>By Promotion of qualified hand from a select list of Category (6)</p> <p>In the absence of qualified persons in item (i) above, by promotion of qualified persons from a select list of Category (7). i)</p> <p>In the absence of qualified persons in items (i) and (ii) above, by direct recruitment</p>	<p>By Promotion</p> <p>Master's Degree with not less than 55% marks through a regular programme in Environmental Engineering or Environmental Technology from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.</p> <p>An experience of total service of 5 years in Category 6 or a total service of 5 years in Category 6 & 7 together.</p> <p>By Direct Recruitment</p> <p>Essential:</p> <p>Master's Degree with not less than 55% marks through a regular programme in Environmental Engineering/ Environmental Technology from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.</p> <p>Minimum 5 years' experience in research activities or teaching or project management in government or quasi-government, government aided institutions in environmental subjects.</p> <p>Desirable: Ph.D. awarded by a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala in the above subjects.</p>
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5	Environmental Scientist	<p>By Promotion of qualified hand from a select list of Category 6</p> <p>In the absence of qualified persons in item (i) above, by promotion of qualified persons from a select list of Category (7).</p> <p>In the absence of qualified persons in items (i) above, by direct recruitment.</p>	<p>By Promotion</p> <p>1. Master's Degree with not less than 55% marks through a regular programme in Environment Management / Environmental Science and Management / Environmental Science from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.</p> <p>An experience of total service of 5 years in Category 6 or a total service of 5 years in Category 6 & 7 together.</p> <p><u>By Direct Recruitment</u></p> <p>Essential</p> <p>Master's Degree with not less than 55% marks through a regular programme in Environment Management / Environmental Science and Management / Environmental Science from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.</p> <p>Minimum 10 years' experience in research activities or teaching or project management in government or quasi-government, government aided institutions in environmental subjects.</p> <p>Desirable: Ph.D. awarded by a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala in any of the above subjects.</p>
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6	Environmental Officer	<p>By Promotion of qualified hand from a select list of Category (7) and (8).</p> <p>In the absence of qualified persons in item (i) above, by Direct Recruitment.</p>	<p>By Promotion</p> <p>Master's Degree with not less than 55% marks through a regular programme in Environmental Science or Environmental Science and Management or Environmental Engineering or Environmental Technology from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.</p> <p>Total service of 2 years in Category (7) or (8).</p> <p>By Direct Recruitment</p> <p>Essential:</p> <p>Master's Degree with not less than 55% marks through a regular programme in Environmental Science or Environmental Science and Management or Environmental Engineering or Environmental Technology from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.</p> <p>Minimum 5 years' experience in research activities or teaching or project management in government or quasi-government or government aided institutions in environmental subjects.</p> <p>Desirable: Ph.D. awarded by a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala in the above subjects.</p>
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7	Assistant Environmental Officer	<p>By Direct Recruitment.</p> <p>By transfer appointment from the select list of qualified Technical Assistants in the Subordinate Service and other Ministerial service staff of the Department of Environment and Climate Change.</p>	<p>By Direct Recruitment</p> <p>Master's Degree with not less than 55% marks through a regular programme in Environmental Science or Environmental Science and Management or Environmental Engineering or Environmental Technology from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.</p> <p>By Transfer Appointment</p> <p>Master's Degree with not less than 55% marks through a regular programme in Environmental Science or Environmental Science and Management or Environmental Engineering or Environmental Technology from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.</p> <p>Total service of 5 years as Technical Assistant in the Subordinate Service or in the Ministerial Service.</p>
8	GIS Specialist (Proposed Post)	By Direct Recruitment	<p>By Direct Recruitment</p> <p>Essential:</p> <p>M.Sc. / M.Tech in any of the following disciplines: Environmental Sciences, Environmental Management, Environmental Studies , Remote Sensing & GIS, Environmental Engineering</p> <p>OR</p> <p>Bachelor of Planning (B.Plan) with Geographic Information System (GIS) as a studied subject</p>

* Note 1. Out of the posts set apart for direct recruitment to the post of Assistant Environmental Officer, 10% of the total posts shall be filled up by recruitment by transfer from the members of the Subordinate Service and Ministerial Service who possess the qualifications prescribed for the post and have successfully completed their probation. In the absence of qualified hands for recruitment by transfer, the vacancies earmarked for such candidates shall be filled up by direct recruitment.

Note 2. All the posts in the service shall be selection posts, promotion to Category 2 to 8 which will be governed by Rule 28 (b) (i) of the Kerala State and Subordinate Service Rules, 1958. In the case of Category (1) and (2) the appointment through promotion, Rule 28 (A) of Kerala State and Subordinate Service Rules, 1958 is applicable.

Note 3. The combined select list for promotion to Category (2) from Categories (3), (4), and (5) shall be prepared on the basis of the date of regular appointment to the respective feeder categories.

Note 4. The combined select list for promotion to Category (6) from Categories (7) and (8) shall be prepared on the basis of the date of regular appointment to the respective feeder categories.

5. Appointing Authority :-

- 5.1 Appointing Authority for categories 1 to 6 shall be the Government of Kerala.
- 5.2 Appointing Authority for categories (7) and (8) shall be the Director of Department of Environment and Climate Change.

6. Qualification regarding Age:-

- 6.1 No person shall be eligible for appointment by direct recruitment to categories 2, 3, 4 and 5 of the Table above, if he/she has not completed 35 years or if he/she has completed 50 years on the first day of January of the year in which applications for appointment are invited. In the case of category (6) and (7), no person shall be eligible for appointment by direct recruitment if he/she has not completed 18 years or if he/she has completed 40 years of age on the first day of January of the year in which applications for appointment are invited.
- 6.2 The condition on raising of upper age limit stipulated in rule 10 (C) of Part II of the Kerala State and Subordinate Service Rules shall not apply in respect of direct recruitment to categories (2), (3), (4) and (5).
- 6.3 Provided that usual relaxation in upper age limit shall be allowed to candidates belonging to Scheduled Castes, Scheduled Tribes, Other Backward Classes, Ex-servicemen and Differently Abled Persons.

7. Reservation:

- 7.1 The Rules relating to reservation of appointments in Rules 14 to 17 of Part II, Kerala State and Subordinate Service Rules, 1958 shall apply to appointment by direct recruitment.

8. Probation

- 8.1 Every person appointed to any post included any of the categories except category (1) shall, from the date on which he joins duty be on probation:
- 8.2 If appointed by direct recruitment or by transfer through the Kerala Public Service Commission or by transfer to a category to which direct recruitment is one of the method of appointment, for a total period of two years on duty within a continuous period of three years.
- 8.3 If appointed by transfer to a category to which direct recruitment is not one of the method of appointment or by promotion or by transfer appointment for a total period of six months on duty within a continuous period of one year.

9. Test:

- 9.1 Every person appointed by Direct Recruitment/ recruited by Transfer in category 7 shall during the period of probation pass the Executive Officers Test/Account Test for Executive Officers, unless he/she has previously passed the tests.

10. Saving Clause:

- 10.1 All persons who are members of this service without the qualification mentioned in these rules, as on the date of commencement of these rules shall be given exemption from possessing the qualification prescribed by these Special Rules for the posts held by them.
- 10.2 They are free to opt for the new Special Rules on their acquisition for the qualification included in the Table given above.

Explanatory Note

(This does not form the part of the notification, but is intended to indicate its general purport)

Section 2(1) of the Kerala Public Service Act, 1968 (19 of 1968) empowers the Government to make rules regulating the recruitment and conditions of service of persons appointed to public services and posts in connection with the affairs of the State. The Government, vide order G.O (Ms) No. 6/2010/Envvt dated 18th December 2010, established the Directorate of Environment and Climate Change and vide order G.O (Ms) No. 9/2012/Envvt dated 05th June 2012 issued the method of the appointment and qualification for the State Service. Government have now decided to issue Special Rules for the Kerala Environment and Climate Change State Service.

This notification is intended to achieve the above object.

Draft Special Rules - Scientific Subordinate Service

GOVERNMENT OF KERALA
Environment () Department

NOTIFICATION

G.O. (P) No. / / Dated, Thiruvananthapuram..... / /

S.R.O.No.

In exercise of the powers conferred by sub – section (1) of section 2 of the Kerala Public Services Act, 1968 (19 of 1968) read with section 3 thereof and in supersession of all the existing rules and orders regarding Kerala Environment and Climate Change State Service, the Government of Kerala hereby make the Special Rules for the Kerala Environment and Climate Change Scientific State Service.

RULES

1. Short title and commencement.

- (1) These Rules may be called “The Kerala Environment and Climate Change Scientific Subordinate Services Special Rules, 2025”
- (2) These Rules shall be applicable to all persons appointed to all categories of Scientific posts fall under the Environment and Climate Change Subordinate Service under Department of Environment and Climate Change.
- (3) They shall come into force at once

2. Constitution: -

- 2.1 The Kerala Environment and Climate Change Scientific Subordinate Service shall consists of the following Group and Categories of officers namely:-

Table I

Category	Name of Post	Appointing Authority
(1)	(2)	(3)
GROUP - I SCIENTIFIC SUBORDINATE SERVICE		
1	Technical Assistant	Director

3. Method of Appointment

3.1 Appointment to the posts included in the various categories of posts shall be made by the Appointing Authority as follows in the column (3) of the Table I given above:

4. Qualifications: -

4.1 No person shall be eligible for appointment to the category mentioned in column (1) of the Table II given below by the method specified in column (3), unless he / she possess the qualifications prescribed in the corresponding entry in column (4) thereof :-

Table II

Category No.	Name of Post	Method of Appointment	Qualifications
(1)	(2)	(3)	(4)
GROUP STATE SUBORDINATE SERVICE			
	Technical Assistant	By Direct Recruitment	Essential: Possess a Bachelor's Degree in Science (B.Sc.) from a recognized University. Desirable: Possess a Degree through a regular programme in Environmental Science or Environmental Science and Management or Environmental Engineering or Environmental Technology from a UGC / AICTE recognized University or National Institute established by the Government of India or Institution established by the Government of Kerala.

5. Appointing Authority :-

5.1 Appointing Authority for categories 1 shall be the Director of Department of Environment and Climate Change.

6. Qualification regarding Age:-

6.1 No person shall be eligible for appointment by direct recruitment if he/she has not completed 18 years or if he/she has completed 40 years of age on the first day of January of the year in which applications for appointment are invited.

6.2 Provided that usual relaxation in upper age limit shall be allowed to candidates belonging to Scheduled Castes, Scheduled Tribes, Other Backward Classes, Ex-servicemen and Differently Abled Persons.

7. Reservation:

- 7.1 The Rules relating to reservation of appointments in Rules 14 to 17 of Part II, Kerala State and Subordinate Service Rules, 1958 shall apply to appointment by direct recruitment.

8. Probation

- 8.1 Every person appointed to the post included in the category (1) shall, from the date on which he joins duty, be on probation:
- 8.2 Appointed by direct recruitment through the Kerala Public Service Commission for a total period of two years on duty within a continuous period of three years.

9. Test:

- 9.1 Every person appointed by Direct Recruitment (1) shall during the period of probation pass the Manual of Office Procedure, unless he/she has previously passed the test.

10. Saving Clause:

- 10.1 All persons who are members of this service without the qualification mentioned in these rules, as on the date of commencement of these rules shall be given exemption from possessing the qualification prescribed by these Special Rules for the posts held by them.
- 10.2 They are free to opt for the new Special Rules on their acquisition for the qualification included in the Table given above.

Explanatory Note

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This notification is intended to achieve the above object.





Institute of Management in Government