

FIFTEENTH KERALA LEGISLATIVE ASSEMBLY

**COMMITTEE
ON
PUBLIC ACCOUNTS
(2023-26)**

NINETY THIRD REPORT

(Presented on 28th Janu., 2026)



**SECRETARIAT OF THE KERALA LEGISLATURE
THIRUVANANTHAPURAM**

2026

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on

Paragraphs relating to Tourism Department contained in the Report of the Comptroller and Auditor General of India (Economic Sector) for the year ended 31st March 2018 and Agriculture & Farmers Welfare Department contained in the Report of the Comptroller and Auditor General of India (Economic Sector) for the year ended 31st March 2019.

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COMMITTEE ON PUBLIC ACCOUNTS (2023-26)
COMPOSITION

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INTRODUCTION

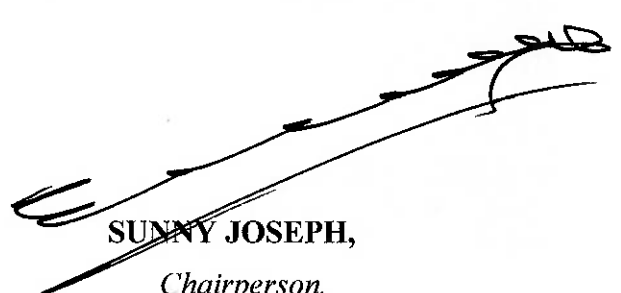
I, the Chairperson, Committee on Public Accounts, having been authorised by the Committee to present this Report, on their behalf present the Ninety Third Report on paragraphs relating to Tourism Department contained in the Report of the Comptroller and Auditor General of India (Economic Sector) for the year ended 31st March 2018 and Agriculture & Farmers Welfare Department contained in the Report of the Comptroller and Auditor General of India (Economic Sector) for the year ended 31st March 2019..

The Reports of the Comptroller and Auditor General of India (Economic Sector) for the years ended 31st March 2018 and 31st March 2019 were laid on the Table of the House on 24th August 2020 and 10th June 2021 respectively.

The Committee considered and finalised this Report at the meeting held on 20th January, 2026.

The Committee place on records our appreciation of the assistance rendered to us by the Accountant General in the examination of the Audit Report.

Thiruvananthapuram,
28th January, 2026.



SUNNY JOSEPH,
Chairperson,
Committee on Public Accounts.

REPORT

Departments of Tourism & Agriculture Development and Farmers' Welfare

3.12 Implementation of projects in Coastal Regulatory Zone (CRZ) areas

Due to the non-adherence to the CRZ notification in implementation of projects by the Department of Tourism, the project proponent, there was loss of Government of India assistance to the tune of ₹9.55 crore in respect of two projects and irregular expenditure of ₹8.97 crore in respect of three projects out of six projects examined.

According to the Coastal Regulation Zone (CRZ) Notification issued (January 2011) by the Ministry of Environment and Forests (MoEF), Government of India (GoI), construction works in the designated areas of CRZ can be undertaken only with the prior approval of the MoEF. For obtaining prior approval under CRZ Notification, the project proponent shall apply to the State Coastal Zone Management Authority with the project layout superimposed on the CRZ map indicating High Tidal Lines and Low Tidal Lines demarcated by an authorised agency.

During the period 2011 to 2018, Department of Tourism, Government of Kerala (DoT) implemented 28 projects for ₹82.52 crore in areas falling under CRZ. In order to assess the compliance of the DoT with the requirements of CRZ Notifications, Audit examined six projects out of the 28 projects. Audit observations are discussed below:

- Although the project proponent was to obtain prior clearance from Kerala Coastal Zone Management Authority (KCZMA) as per the CRZ notification, DoT, the project proponent, entrusted the implementation of all the six projects examined by Audit to various agencies¹ without obtaining prior CRZ clearance from KCZMA. The

1 Kerala Irrigation Infrastructure Development Corporation, District Tourism Promotion Council, Malappuram, Inland Navigation Directorate, KITCO Ltd. and Harbour Engineering Department.

agencies, in turn, awarded the work to contractors without any CRZ clearance.

- In respect of the projects for development of Kottapuram House Boat Terminal and development of Ottumburam beach, DoT did not apply for CRZ clearance so far (July 2019). The reasons for non-submission of application in respect of these two projects were not recorded.

Out of the above two projects, construction works of the project for development of Ottumburam beach was completed incurring an expenditure of ₹1.29 crore. Work was yet to start in respect of the other project. As the construction work in respect of one project was executed without CRZ clearance, the amount of ₹1.29 crore incurred became irregular.

GoK replied (September 2019) that though the executing agency submitted a final bill for ₹1.29 crore in respect of the Development of Ottumburam Beach project, only ₹1.12 crore was released. The District Tourism Promotion Council has taken steps to obtain CRZ clearance for completing the project. In respect of 'Development of Kottappuram House Boat Terminal', the Inland Navigation Department, GoK was directed to take steps for obtaining CRZ clearance.

The reply was not acceptable as the CRZ clearance for the projects were to be obtained beforehand. In respect of the above projects, the same not obtained as of September 2019, even after incurring expenditure of ₹1.29 crore.

- Out of the four projects² for which CRZ clearance was applied, KCZMA accorded approval only for two³ projects. In respect of one project⁴, KCZMA denied (July 2018) clearance on the ground that the plot area was insufficient while in respect of the other

2 Construction of new building for KITTS training centre at Thalassery, Development of Kappil Beach and Boat Club, Development of Payyambalam Beach walkway, Kannur and House boat terminal at Kayamkulam.

3 Development of Kappil Beach and Boat Club and Development of Payyambalam Beach walkway, Kannur.

4 Construction of new building for KITTS training centre at Thalassery.

project⁵, KCZMA issued (July 2015) show-cause notice for violation of CRZ notification. The DoT incurred an expenditure of ₹7.68 crore as on March 2019 in respect of these two projects. As the KCZMA did not issue CRZ clearance for these two projects, the amount of ₹7.68 crore incurred was irregular.

GoK replied (September 2019) that the Tourism Department filed an appeal before the KCZMA for obtaining CRZ clearance for the project at Thalassery while in respect of the project at Kayamkulam, GoK replied that the project was exempted from CRZ regulations and that the documents in support of the above were submitted to KCZMA.

The reply was not acceptable as the failure of the DoT to obtain prior CRZ clearance necessitated the need for appeal before the KCZMA. These appeals were not allowed by the KCZMA as of September 2019.

In respect of 'Development of Kappil Beach and Boat Club' and 'House boat terminal at Kayamkulam' projects, the implementing agency⁶ proceeded with the work on the assumption that the local body would obtain CRZ clearance. But the local bodies did not obtain CRZ clearance. Gol assistance of ₹3.23 crore and ₹7.83 crore respectively was sanctioned for their implementation. As per the conditions for sanction of Gol assistance, the projects were to be completed within 24 and 36 months respectively.

Gol released (March 2013) first instalment amounting to ₹1.51 crore in respect of these two projects. Release of subsequent instalments was dependent on submission of utilisation certificate.

Due to non-obtaining prior CRZ clearance, the KCZMA stopped the work in respect of these two projects. Consequently, there was delay in submission of utilisation certificate for the amount released and completion of the projects. Hence, the

⁵ House boat terminal at Kayamkulam.

⁶ Kerala Irrigation Infrastructure Development Corporation.

subsequent instalments of Gol assistance amounting to ₹9.55 crore was not released and the DoT met the expenditure using GoK funds.

In respect of the project for 'Development of Kappil Beach and Boat Club', GoK replied (September 2019) that the delay in completion was due to non-availability of land and the long span of time required to obtain clearance from KCZMA.

The reply was not acceptable as the availability of land did not hamper the implementation of the project. The stoppage of work by the KCZMA was due to non-obtaining prior CRZ clearance. The DoT submitted application for CRZ clearance only after stoppage of work by the KCZMA. The CRZ clearance is still awaited.

Thus, due to non-adherence to the CRZ notification in implementation of projects, there was loss of Gol assistance to the tune of ₹9.55 crore in respect of two projects and irregular expenditure of ₹8.97 crore in respect of three projects out of the six projects examined.

[Audit paragraph 3.12 contained in the Report of the Comptroller & Auditor General of India for the year ended 31st March, 2018 (Economic Sector)]

[Notes received from the Government on the above audit paragraph are included as Appendix-II]

Excerpts from the discussion of Committee with officials concerned

1) While discussing the audit observation related to the implementation of projects within the Coastal Regulatory Zone (CRZ), the Committee expressed significant concern over the delayed submission of the remedial measures taken by the Department. As the statement pertaining to those measures was received only on the last day, the Committee did not get enough time to examine the reply furnished by the Department. The Committee remarked that despite pointing out the delayed submission of the reply

on multiple occasions, the Department was not complying with the direction of the Committee. The Secretary, Tourism Department acknowledged the delays in the submission of reports, stating that the response could only be finalized after the completion of two review meetings. Then the Joint Secretary, Legislature Secretariat highlighted that the Department's non-compliance with the CRZ notification during project execution resulted in the loss of Government of India assistance amounting to ₹9.55 crore for two projects, along with an irregular expenditure of ₹8.97 crore related to three of the six projects evaluated by the Accountant General. The Secretary, Tourism Department further explained that the necessary CRZ clearance was not obtained at the commencement of the projects, and the project approval was granted based on the assumption that the CRZ clearance would be secured subsequently. However, the CRZ clearance was ultimately received on 31st March, 2016, by the time the central share of ₹9.55 crore had already lapsed, since the Department was able to provide the Utilization Certificate for the first installment only. Moreover, the Secretary, Tourism Department conveyed that the project became 'SWADESH DARSAN Scheme' but was later discontinued. Following that, the State Government allocated funds for the project, which was completed and subsequently transferred to the District Tourism Promotion Council (DTPC).

2) The Committee sought clarification regarding the decision to approve the project without securing the necessary CRZ clearance. The Secretary, Tourism Department indicated that it was a common practice at that time, with the understanding that CRZ clearance could be obtained subsequently. At present, the Administrative and Technical Sanctions would be provided only upon submitting a check list including details of land, CRZ clearance etc. The Committee further enquired whether there was any willful flaw on anyone's part. The Secretary, Tourism Department informed that the Government

had decided to continue the projects as they were centrally sponsored projects funded by both the Central and State Governments and certain projects still lack CRZ clearance. The Committee highlighted an observation of the C&AG, which noted that applications for CRZ clearance for the Kottappuram House Boat Terminal and Oottumburam Beach projects had not been submitted till the time of audit. The Secretary, Tourism Department stated that the application for CRZ clearance was submitted by the concerned project implementing agencies and the application for CRZ clearance for the Kottappuram House boat Terminal project was submitted later and got clearance on 30.12.2022. The project was completed and handed over to the department concerned.

3) When the Committee enquired about the irregular expenditure of ₹8.97 crore incurred for the three projects, the Secretary, Tourism Department clarified that although those projects were centrally sponsored, the expected fund could not be made available. Therefore, the expenditure incurred for the completion of the project had to be met by the State Government. Hence it was stated as irregular expenditure. To a further query of the Committee, the Secretary, Tourism Department informed that central assistance was lapsed due to the non availability of CRZ clearance. The Committee observed it as a serious lapse on the part of the Department and enquired whether any action had been taken against the officials responsible for the loss. The Secretary, Tourism Department replied that no action had been taken against the officials concerned, and added that proposals were being submitted all of a sudden to get the central assistance and at that time the DPR was submitted without obtaining CRZ clearance and proper verification and application for CRZ clearance were submitted later by the implementing agency concerned. But in projects like SWADESH DARSHAN and PRASAD (Pilgrimage Rejuvenation and Spiritual Augmentation Drive) approval was given only on strict compliance with all the norms including CRZ clearance.

4) When the Committee further enquired whether CRZ clearance and Inland Navigation Clearance were mandatory for all projects, the Secretary, Tourism Department informed that Inland Navigation Clearance was needed for bridge works only. In bridge works, the Projects should be done in accordance with the height distance of National Water ways and Feeder water ways as mandated in the Inland Navigation Rules and apart from the 5 metre height distance mentioned in the rules, bridges were constructed earlier in Kuttanad and Kayamkulam at a height distance of 3 metres, but later those bridges were demolished. Presently, new bridge projects were being constructed in strict compliance with the Inland Navigation Rules of 1967. The Committee urged that action should be taken against the officers responsible for sanctioning the projects without obtaining CRZ clearance. The Secretary, Tourism Department assured that an explanation in that regard would be sought from the officials concerned.

5) when the Committee enquired about the details regarding the projects in Kayamkulam and Thalassery, the Secretary, Tourism Department informed that even though the project was started in 2013, the application for CRZ clearance for the Kayamkulam project was not submitted and later the application for regularization was submitted by the District Tourism Promotion Council (DTPC), Alappuzha on 05.08.2023. The Committee further enquired whether proper monitoring was done by the Department in that regard. The Secretary informed that proper monitoring is being done at present. Even though monitoring was done earlier, CRZ clearance and other clearances were not monitored properly. The Committee expressed its extreme displeasure over the improper monitoring done by the Department and suggested that a more robust system of oversight could serve to avert potential issues in future, emphasizing the importance of timely intervention to address and rectify any discrepancies that may arise. The Committee opined that the explanation submitted by the Department regarding the commencement of work without obtaining the necessary

clearances and not taking any steps for obtaining clearances even after the completion of the work, was not satisfactory. Therefore, the Committee directed the Department to seek an explanation from the officers responsible for such flaws. The Secretary, Tourism Department agreed to do so.

6) While discussing the issues related to the project, the development of Kappil Beach & Boat Club, the Committee observed that as the central assistance was not received due to issues in connection with CRZ clearance, the project was to be completed by the State Government. The Committee enquired whether such constructions had to be demolished as CRZ clearance was not received later. The Secretary informed that such types of works were being done by DTPC in many sites and applications for regularisation had been submitted, though delays had occurred. To a further query of the Committee regarding the difficulties in getting CRZ clearance, he added that even though the agency is a State level body, the clearance could be granted only if the Central Government norms were being strictly followed.

7) During the discussion, the Principal Accountant General pointed out that it was very difficult to get the CRZ clearance as per the Central norms and due to the non-fulfillment of conditions, application for regularisation could not be sanctioned. When the Committee enquired the reason for the delay in submitting the application for regularisation, the Secretary, Tourism Department informed that for obtaining the Central share of GoI assisted projects, the DPR had to be submitted in time. He added that as the CRZ clearance was not obtained within the time frame, the DPR was being submitted in haste to avoid loss of central allocation and steps for obtaining CRZ clearance would be taken later. To a further query of the Committee regarding the implementing agency of the project, he stated that the project in Kayamkulam was done by Kerala Irrigation Infrastructure Development Corporation. The Principal Accountant

General brought to the attention of the Committee that the work in Kayamkulam was started in 2013 and the Department did not take any action for obtaining the clearance despite the audit reference, and they might have applied for CRZ clearance after receiving the notice of the meeting. The Secretary, Tourism Department admitted the lapse occurred on the part of the Department and added that the Department would take earnest efforts to ensure that mandatory/statutory clearance should be obtained before issuing Administrative Sanction/Technical Sanction in order to avoid such flaws in future.

8) The Committee noted with concern that the application for CRZ clearance for the work started in 2013 was submitted only in 2023. The committee pointed out that due to errors on the part of the Department, central assistance was not received for such projects. Hence the expenditure incurred had to be met by the state. It was a potential issue and may lead to serious problems in future. The Committee decided to recommend that CRZ clearance and availability of land should be ensured before sanctioning any project. The Secretary, Tourism Department agreed to do so.

9) To a query of the Committee regarding the central assistance in connection with Kottappuram House Boat Terminal, the Secretary, Tourism Department submitted that central assistance as well as CRZ clearance had already been obtained for that project and was completed. In the case of Ottumburam Beach though the Utilisation Certificate was submitted, CRZ clearance was not yet obtained. He added that in addition, the project in Payyambalam was not located in the CRZ zone. To the further query of the Committee regarding the project in Thalassery, the Secretary, Tourism Department informed that the project for the construction of new building for KITTS Training Centre at Thalassery was denied by KCZMA in 2018. The estimated cost of the project was ₹2.10 Crore, but no work had yet begun.

Conclusions/Recommendations

10) The Committee expresses its extreme displeasure over the improper monitoring by the Department in connection with the projects implemented in Kayamkulam and Thalassery. The Committee urges that a more robust system of oversight be ensured to avert potential issues in future, and timely intervention should be made to rectify emerging discrepancies.

11) The Committee notices that the explanation given by the Department regarding the commencement of work related to the projects in kayamkulam and Thalassery without getting proper clearance and not taking any steps for obtaining the necessary clearance even after the completion of the work was not satisfactory. Therefore, the Committee directs the Department to seek explanation from the Officers responsible for the flaws and submit to the Committee urgently.

12) The Committee directs the Department to take earnest efforts to ensure that mandatory/statutory clearance should be obtained before issuing Administrative/ Technical sanction in order to avoid flaws in future. The Committee also suggests that availability of land should be ensured before sanctioning any Projects.

2. Functioning of the Kerala Agricultural University

2.1 Introduction

Agriculture in Kerala is distinctly different from the rest of India in many ways. Kerala has unique and diverse agro-climatic conditions in various regions, which enable it to cultivate many types of crops. Predominance of non-food plantation sector, multi-cropping systems, homestead farming and abundance of biodiversity are a few among these specific features. Agriculture in Kerala is dominated by small and marginal

farmers. The average size of land holding is around 0.27 ha. The population density is very high. More and more agricultural lands are converted due to population pressure. As per the land use data of 2018-19, out of a total geographical area of 38.86 lakh ha, total cultivated area is 25.68 lakh ha (66 per cent).

The Kerala Agricultural University (the University) was established in February 1971 under an Act⁷ of the State with the objective of imparting education and undertaking research and extension activities in the field of agriculture and allied sciences. A model Act proposed by the Indian Council of Agricultural Research (ICAR) in 2009 for replacing the existing Kerala Agricultural University Act, 1971 is under consideration of the Government. The stated mission of the University is Excellence in Agricultural Education, Research and Extension for Sustainable Agricultural Development and Livelihood security of farming community. The University fulfills its mission through a network of institutions spread over the State consisting of seven constituent colleges, six Regional Agricultural Research Stations (RARS), sixteen research stations, one Central Training Institute, one Communication Centre and seven Krishi Vigyan Kendras (KVK). There is a network of libraries, including a Central Library in the main campus, constituent colleges, RARS, research stations and KVKs. Besides, there is an Academy of Climate Change Education and Research (ACCER) offering M.Sc. (Integrated) in Climate Change Adaptation. The Act mandates that all institutions under its jurisdiction shall form constituent units and prohibits the University from granting affiliation to any institution. The University offers diploma, graduate, post-graduate and doctoral programmes in almost all disciplines related to Agriculture, Agricultural Engineering, Forestry, Horticulture and allied sciences.

The University is the principal instrument in the State in providing the skills and

⁷ The Kerala Agricultural University Act, 1971.

technology required for the sustainable development of its agriculture, agricultural engineering, horticulture and forestry by integrating education, research and extension. The University focuses its strategy on synergising multi-disciplinary education and strengthening problem-specific research relevant to the State and help building innovative extension systems for sustainable management of natural resources, sustainable agricultural production and overall improvement of rural livelihood.

2.1.1 Organisational setup

The Vice-Chancellor (VC) is the principal executive and academic officer of the University. General Council, Executive Committee, Academic Council, Faculties and Board of Studies are the 'Authorities of the University'. The VC is assisted by Registrar, Comptroller, Deans of the Faculties, Directors of (i) Research, (ii) Extension, (iii) Physical Plant⁸, (iv) Students' Welfare and Librarian who are designated as 'Officers of the University' and they hold their posts for specific tenure.

The General Council is the supreme authority of the University and its constitution is as per Appendix III(1). Ordinarily, the Council meets once in four months. It has the powers to review the actions of the Executive Committee and Academic Council. It is the authority vested with powers to make, amend or repeal Statutes.

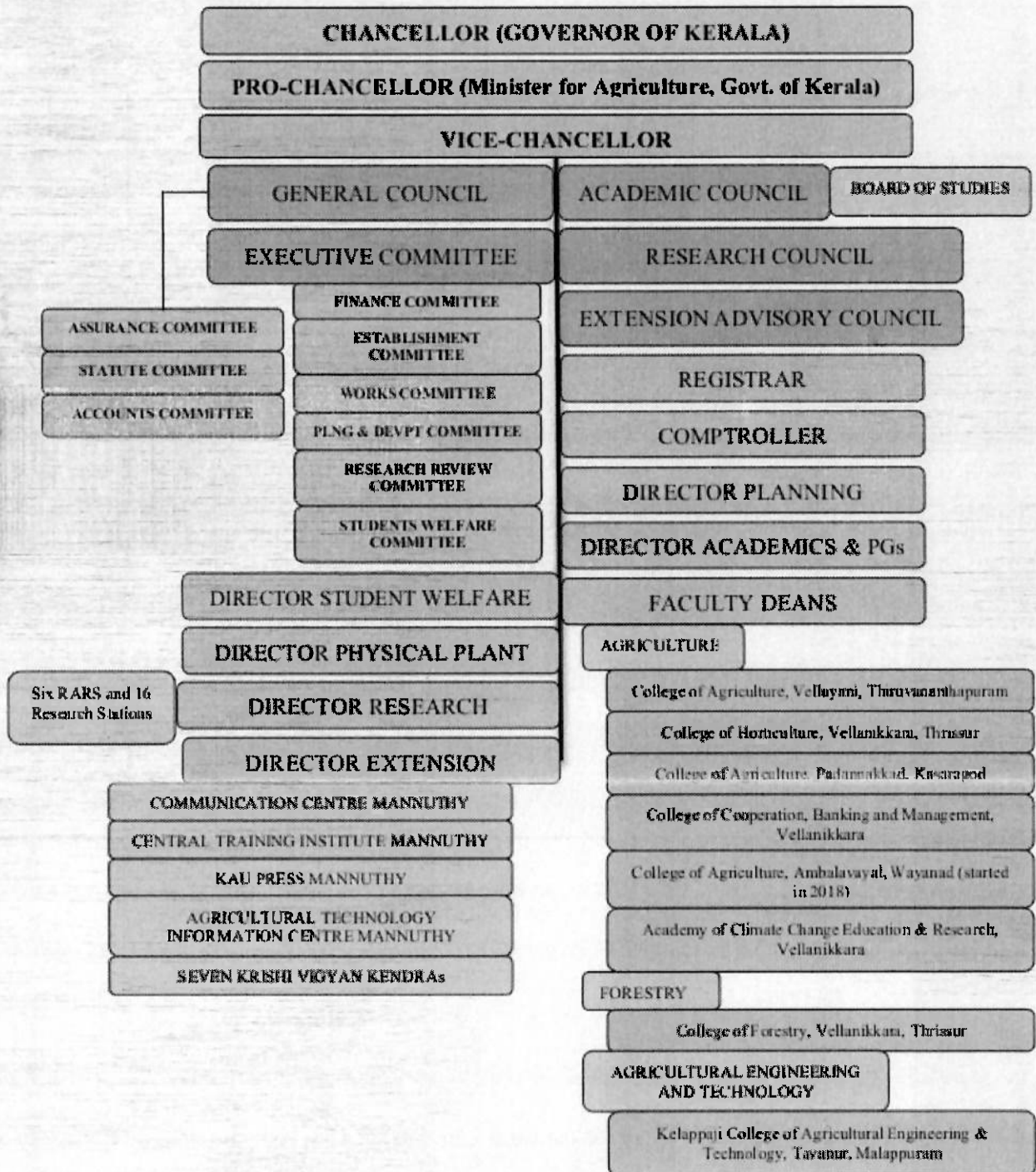
The Executive Committee is the chief executive authority of the University and its constitution is as per Appendix III(2). The Executive Committee shall meet, as and when required. It has the powers including general superintendence and control over the institutions of the University. It is vested with the powers to make ordinances and to amend or repeal the same.

The Academic Council is the body responsible for the maintenance of standards in

⁸ 'Director of Physical Plant' who is the general custodian of all University properties and responsible for construction and maintenance.

educational programmes and examinations and its constitution is as per Appendix III(3). The Academic Council shall meet ordinarily once in a trimester. It has the powers to make regulations and to amend or repeal the same.

The administrative structure of the University is given below:



2.2 Audit objectives

The objectives of the Performance Audit were to assess:

- the extent to which the Kerala Agricultural University had achieved its organisational goals and objectives in the areas of academic, research and extension education activities with reference to the existing Act and Regulations;
- the adequacy of its financial management and internal controls in ensuring economy, efficiency and effectiveness in the functioning of the University.

2.3 Audit criteria

Audit criteria were derived from:

- The Kerala Agricultural University Act, 1971, Statutes, Ordinances and Regulations framed thereunder;
- Kerala State Agricultural Development Policy, 2015;
- University Grants Commission (UGC) Regulations and ICAR Guidelines;
- Kerala Financial Code and Kerala Account Code;
- Project/scheme guidelines of various funding agencies.

2.4 Audit scope and methodology

The Performance Audit was conducted from July to December 2019 covering the period from 2014-15 to 2018-19. Audit examined the records at the Government Secretariat, the University headquarters and at selected units of the University.

Audit selected all eight academic institutions, three⁹ RARSs out of six and three¹⁰ KVKs out of seven through random sampling for detailed scrutiny. Similarly, 54 out of 265 research projects and 29 out of 127 extension projects were selected based on stratified random sampling method. An entry conference was held in July 2019 attended by officials from the Government and the University, in which the audit objectives, audit

⁹ RARS at Vellayani, Kumarakom and Ambalavayal.

¹⁰ KVK Kollam, Kottayam and Kannur.

criteria, audit scope and methodology were discussed. Similarly, an exit conference was conducted in October 2020 to discuss the audit findings.

2.5 Audit findings

The audit findings as against the audit objectives are grouped under six categories namely; Governance, Academic activities, Research, Extension education, Financial Management and Internal Controls as given below.

2.5.1 Governance

'Governance' in the University denotes the framework within and by which the University exercises powers and discharges its functions. Governance plays an important role in the overall performance of the University as deficiencies in Governance have a cascading effect on the other functions of the University. The Kerala Agricultural University Act, 1971 (the Act), the Statutes and the Ordinances and Regulations framed under the Act provide a self-contained framework for the internal governance of the University. Further, the Act has designated various 'authorities' and 'officers' of the University to exercise powers.

The meetings of the General Council and the Executive Committee were held as stipulated. The Registrar being the ex-officio secretary to the General Council, the Executive Committee and the Academic Council is bound to place before each such authority all such information (UGC Regulations, ICAR Guidelines, applicable Government Orders etc.) as may be necessary for the transaction of its business and decision making. The officers of the University, including the Registrar are not appointed as per the statutory provisions as detailed in para 2.5.1.2. Due to such temporary arrangements, the Authorities of the University could not properly exercise the powers vested in them to make/amend Statutes, Ordinances and Regulations as prescribed in

the Act. This resulted in taking decisions which were not in compliance with the regulatory frameworks including the UGC Regulations and ICAR guidelines etc. as discussed in this report.

Audit examined the governance framework of the University consisting of the Act, Statutes, Ordinances and Regulations and the compliance thereof by the authorities and officers of the University. The audit findings in respect of Governance are discussed below.

2.5.1.1 Deficiencies in Governance Framework

Lapses in the following areas indicated that the system of governance in the University was not effective.

- **Non-framing of Statutes** - Section 7(11) of the Act empowers the University to create posts for teaching, research and extension education and to appoint persons to such posts. Section 42(3) of the Act stipulates that the procedure for selection of officers, teachers and other employees of the University shall unless otherwise provided for in this Act, be such as may be prescribed in the Statutes. Audit observed that the General Council of the University created several posts including senior level posts such as Dean of Forestry (head of the College of Forestry), Controller of Examinations, Associate Deans (head of various colleges), Associate Directors (heads of various research stations) but did not frame and pass Statutes specifying the procedure of selection to these posts Appendix III (4). This was the case even in respect of the post of the Director of Students Welfare, a post specified in the Act since the inception of the University. Consequently, the University could not carry out regular recruitment to these posts and these posts were operated by giving additional

charge to senior faculty members, which affected their academic and administrative performance. The University attributed the under-performance in respect of its research papers published in scientific journals to multiple responsibilities and excess work pressure, as discussed in paragraph 2.5.3.1. The Government in its reply (October 2020) stated that Statutes for these posts were being framed and the process would be expedited.

- **Non-amendment of Ordinances** - Section 7(14) of the Act empowers the University to fix, demand and receive such fees and other charges as may be prescribed. Section 50(a) of the Act stipulates that the Executive Committee shall have power to make Ordinances regarding levy of fees in colleges and other institutions by the University. Audit observed that the University last amended the relevant Ordinance in September 2002, but revised the fees periodically without amending the Ordinance. As a result, the fees levied now is much higher than what is prescribed in the Ordinance, as shown in the following table:

Table -2.1 : Fee Details

Name of programme	Fees fixed as per amended ordinance, 2002 (in ₹)		Fees collected in 2019 (in ₹)	
	First semester	Second semester onwards	First semester	Second semester onwards
B.Sc. (C&B)	1,800	1,285	11,980	9,580
All other UG programmes	2,200	1,685	11,980	9,580
B.Tech (Food Engg.)*	-	-	36,250	30,000
Master's Degree programme	4,250	3,025	16,710	13,510
MBA (Agribusiness Management)*	-	-	36,500	29,000
B.Sc-M.Sc. (Integrated)*	-	-	44,000	40,000
Doctorate Degree Programme	5,525	3,925	17,500	13,510

** Programme instituted after 2002*

Levy of fees at rates higher than those notified through Ordinances was irregular and its legality is questionable. The Government in its reply (October 2020) stated that,

henceforth the University shall ensure that the Ordinances are amended promptly by the Executive Committee for levy of fees in colleges/other institutions.

- **Non-publishing of Regulations in the Gazette** - Academic Council is the Body which frames, amends and repeals Regulations regarding academic matters subject to the provisions of the Act, Statutes and Ordinances. Section 55 of the Act stipulates that all Statutes, Ordinances and Regulations made under the Act shall be published in the Gazette. The Statute No.839/74 require that a copy of the Ordinances and Regulations be forwarded to the Chancellor besides placing them before the General Council as soon as they are made. Audit observed that the University has framed five Academic Regulations and published it in its handbook (which is an internal document of the University, unlike the Gazette), but none of these were published in the Gazette as mandated in the Act. No copies of these Regulations were submitted to the Chancellor. Non-submission of the Regulations to the Chancellor who is the Head of the University and the non-publication of Regulations in the Gazette as mandated by the Act made the validity of the Regulations questionable. The Government in its reply (October 2020) stated that the University will henceforth ensure that all Ordinances and Academic Regulations are placed before the General Council for its approval and it will be published in the Gazette and it will be submitted to the Chancellor.

2.5.1.2 Officers of the University

The Vice-Chancellor is appointed by the Chancellor and the Comptroller by the Government. Appointment to the posts of other officers of the University is done by Executive Committee. Audit examined the procedure followed by the University in appointing the 'Officers of the University'. The Statutes governing appointments of 'Officers of the University' (except VC and Comptroller) stipulate that their appointment

shall be done by inviting applications through advertisement except for the Registrar and Director of Physical Plant who can also be appointed on deputation. Appointments to these posts are for a fixed tenure¹¹. Audit noticed that the University did not appoint these Officers in the prescribed manner during the past several years as shown in the table below. Instead, it nominated teaching staff to these posts (except librarian) with full additional charge.

Table-2.2: Procedure prescribed for appointment of Officers of the University

Sl. No.	Designation	Date of last regular appointment	Procedure prescribed for appointment
1	Registrar	22/05/2003	Direct recruitment or deputation
2	Director of Physical Plant	22/06/2004	Direct recruitment or deputation
3	Librarian	16/05/1995	Direct recruitment
4	Dean (Faculty of Agriculture)	03/07/2010	Direct recruitment
5	Dean (Faculty of Agriculture Engineering)	04/07/2010	Direct recruitment
6	Dean (Faculty of Forestry)	Statute not made	Not prescribed
7	Director of Research	03/07/2010	Direct recruitment
8	Director of Extension	03/07/2010	Direct recruitment
9	Director of Students' Welfare	Statute not made	Not prescribed

No appointment as stipulated under the Statutes has been made by direct recruitment/deputation as required for the posts, after the last regular appointment as shown in the table. Audit noticed that these in-charge postings of short duration compromising the efficiency of internal governance had become a regular practice in the University. Statute No. 266/72 empowers the Vice-Chancellor to make provisional appointments only under emergent situations.

The Act and the relevant Statute stipulate that the Registrar shall be a whole-time officer of the University and also the ex-officio Secretary to the General Council,

11 The period of appointment of these officials shall be five years in the first instance, except Registrar who shall be appointed in the first instance on probation for a period of one year within a period of two years and on satisfactory completion of probation shall be confirmed. In the case of persons above 50 years of age, the period of appointment shall be so fixed as to terminate on the date of superannuation which is currently 56 years for Registrar and 60 for others.

Executive Committee and Academic Council. Audit noticed that the University did not comply with the statutory provisions while appointing Registrars. During the period from 25 January 2007 to 30 March 2019 (12 years and two months) 12 officials (excluding the present incumbent) held charge of the post of Registrar with periods of incumbency ranging from one month to three years. These stopgap arrangements did not provide many of the incumbents the time required to familiarise themselves with the rules and regulations governing the administrative system of the University before they retired, thus affecting their capacity to discharge duties efficiently.

The Government stated (October 2020) that the University will take necessary steps to appoint a Registrar as per the statutory provisions by direct recruitment or by deputation. It was also stated that Statutes were being framed wherever required and that action would be taken for regular appointment against posts of all Officers.

The failure of the University to carry out regular appointment to these posts, especially that of the Registrar contributed to the non-compliances to the regulatory norms as discussed in the succeeding paragraphs.

[Audit Paragraphs 2.1 to 2.5.1.2 contained in the Report of Comptroller & Auditor General of India for the year ended 31st March, 2019 (Economic Sector)]

[Notes received from the Government on the above audit paragraph are included as Appendix-II]

Excerpts from the discussion of Committee with officials concerned

13) When the Committee enquired about the above audit objections, the Agriculture Production Commissioner (APC) & Principal Secretary, Agriculture Department informed that it was an observation made by the Audit in 2019. Subsequently, the statute was prepared by Kerala Agricultural University, the Indian Council of Agricultural Research

(ICAR) revised the qualifications for several posts and all of them had been submitted for the approval of Honb'le Chancellor. The Committee further enquired the reason for keeping the posts of Registrar and Dean as vacant, the APC & Principal Secretary, Agriculture Department informed that no appointments had been made pursuant to the statute and additional charges were given in such posts. The Committee noted that there was no permanent appointment in key posts such as Dean, Research Director etc., and the notifications invited for the posts in 2016 were cancelled due to a case filed in the Honb'le High Court of Kerala and later re-notification was issued in 2022. The Principal Secretary, Agriculture Department had been given the charge of Vice Chancellor. The Principal Secretary & APC, Agriculture Department further informed that no subsequent steps have been taken for the appointment of the Registrar, despite a notification issued in 2022. The delay is attributed to a legal case pending in the Honb'le High Court of Kerala, which stipulates that the appointment of the Registrar should be done only after employing a permanent Vice Chancellor. The Honb'le High Court had also stayed the appointment of teachers as there was no permanent Vice Chancellor. The Committee expressed its concern, noting that due to the ongoing legal proceedings and the involvement of the Chancellor, there were limitations to express a definitive opinion on the matter. The Committee conveyed its dissatisfaction with the extensive delays in university appointments and resolved to recommend that the Government take prompt action to facilitate regular appointments

Conclusion/Recommendation

14) The Committee expresses its dissatisfaction with the inordinate delays in university appointments and recommends that proper action should be taken by the Government to facilitate regular appointments.

2.5.2 Academic Activities

2.5.2.1 Enrolment of Students

The University offers five Under Graduate programmes¹² of four years' duration in as many disciplines. The syllabus followed by the University is based on the curriculum proposed by ICAR. As against the intake capacity, the actual enrolment to these programmes during the five year period from 2014 to 2018 were as follows:

Table-2.3: Intake Capacity and the number of students admitted to programmes

Year	B.Sc (Hons.) Agriculture		B.Sc (Hons.) Forestry		B.Sc (Hons.) C&B		B.Tech Ag. Engineering		B.Tech Food Engineering	
	Intake Capacity	Admitted	Intake Capacity	Admitted	Intake Capacity	Admitted	Intake Capacity	Admitted	Intake Capacity	Admitted
2014	209	210	30	30	40	35	49	41	30	17
2015	209	232	30	30	40	38	49	43	30	20
2016	209	216	30	30	40	37	49	49	30	29
2017	208	209	31	31	40	40	50	42	30	22
2018	420	418	31	30	40	39	50	47	30	29

The number of students admitted was above the intake capacity in some programmes as additional seats were allotted to various categories such as diploma holders in Agricultural Sciences, Children of personnel retired from paramilitary services in the State and holders of Vocational Higher Secondary Education (Agriculture).

The University increased the intake capacity of its B.Sc. (Hons.) Agriculture programme due to its increased demand, from 208 to 420 in the year 2018 by increasing the capacity of the existing Colleges and opening a new College. Besides, it offers seven¹³ Masters programme in 32 disciplines with a total intake capacity of 320 and two¹⁴ B.Sc. – M.Sc. Integrated programmes with intake capacity of 20 each. The University also offers six doctoral programmes in 26 disciplines with total intake capacity of 113 as of 2019.

12 B.Sc (Hons.) Agriculture, B.Sc. (Hons.) Co-operation & Banking, B.Sc. (Hons.) Forestry, B.Tech (Agri. Engineering) and B.Tech (Food Engineering).

13 M.Sc. Agriculture/Horticulture, M.Sc. Community Science, M.Sc. Agricultural Statistics, M.Sc. Forestry, M.Sc. Cooperation and Banking, MBA Agri. Business Management and M.Tech (Ag. Engg.).

14 B.Sc. - M.Sc. (Integrated) Biotechnology and B.Sc - M.Sc. (Integrated) Climate Change Adaptation.

The total student strength as of March 2019 is 2,412¹⁵.

University Grants Commission (UGC) was established under the UGC Act, 1956 for determining the standard of Universities, promotion and co-ordination of University education. The Act empowers UGC to frame regulations for the purpose of performing its functions like defining the qualifications and standard that should ordinarily be required of any person to be appointed in the Universities. Universities are governed by these regulations which are subordinate legislation and have binding effect.

The Indian Council of Agricultural Research (ICAR), an autonomous organisation under the Department of Agricultural Research and Education (DARE), Ministry of Agriculture and Farmers Welfare, Government of India is the apex body for co-ordinating, guiding and managing research and education in agriculture including horticulture, fisheries and animal sciences in the entire country. ICAR has recommended the minimum standards in respect of infrastructure, equipment, staff strength, curricula etc. to be maintained by the Agricultural Universities. The audit findings on the University's academic activities are discussed below:

2.5.2.2 Accreditation

Accreditation is a process of quality control in higher education, carried out by an authorised agency through scientific evaluation or assessment, whereby an institution of higher education or a programme conducted by that institution is recognised as conforming to the parameters of academic quality. Quality assurance, including accreditation processes, is one of the universal techniques to enhance global competitiveness.

According to the UGC (Mandatory Assessment and Accreditation of Higher Educational

¹⁵ UG – 1,633, PG - 594 and Ph.D. - 185.

Institutions), Regulations, 2012 (The UGC Accreditation Regulation, 2012) accreditation is compulsory for all universities. Each accredited higher educational institution is to apply for re-accreditation six months before the expiry of the existing accreditation in accordance with the norms and procedures prescribed by the relevant Accreditation Agency. The validity of accreditation is for five years.

Audit observed the following lapses/irregularities relating to the accreditation of the University:

- **Delay in applying for renewal of Accreditation:** The National Agricultural Education Accreditation Board (NAEAB) of ICAR gave accreditation (2014) to the University and its constituent colleges which were valid up to 10 March 2019. ICAR in its letter dated 09 October 2018 reminded the University to apply for renewal of accreditation without delay and also intimated that accreditation was mandatory for the release of development grant from it. Despite this, the University did not apply for renewal of accreditation within the timelines prescribed in the UGC accreditation Regulation, 2012, but applied (19 February 2019) for renewal of accreditation just 19 days prior to the expiry of existing accreditation. The NAEAB renewed the accreditation only in September 2020. As a result, ICAR did not release development grant to the University for the year 2019-20 even though the University had requested ₹91.47 crore.

In its reply (October 2020), the Government contended that the NAEAB had not stipulated any timeline for renewal of accreditation and that the delay in getting accreditation was due to non-compliance of timelines by the NAEAB. Regarding non-release of development grants, it was stated that normally the ICAR development grants were limited to ₹ 4 crore to 5 crore only and that the

University had requested for additional grant in the ensuing allocation.

The reply of the Government is not tenable as the UGC Accreditation Regulations 2012 is applicable to all Universities including Kerala Agricultural University and it should have followed the timeline prescribed.

- **Inaccuracies in the application for renewal of accreditation:** The process of accreditation starts with the submission of a Letter of Intent (LOI) by the University along with the proforma for the Institutional Eligibility for Accreditation (IEA) to the NAEAB Secretariat. The proforma for IEA includes an action taken report on the last recommendation/observation of NAEAB, the status of implementation of ICAR guidelines including the Fifth Deans' Committee recommendations, conduct of academic audit, publishing of Annual Academic Calendar, etc. In addition to these, a statement on the compliance of the University Grants Commission (Minimum Qualifications for Appointment of Teachers and other Academic Staff in Universities and Colleges and other Measures for the Maintenance of Standards in Higher Education) Regulations, 2010 (UGC Regulations, 2010) and the University Grants Commission (Minimum Standards and Procedure for the award of M.Phil./Ph.D. degree) Regulations, 2009 (UGC Ph.D. Regulations, 2009) should also be submitted. If the IEA is found satisfactory, the NAEAB Secretariat shall send a letter in this regard to the University/ institution following which the University is required to submit the accreditation fees along with Self Study Reports (SSR). A Peer Review Team (PRT) is formed by NAEAB after scrutiny of the SSR. The peer review team visits the University and submits its report to the NAEAB. The NAEAB takes a decision on accreditation based on the report. If the IEA is not satisfactory, it shall be

rejected along with the action taken report and the university/ institution shall re-submit the document after due modification/justification.

As NAEAB ascertains eligibility of an institution for accreditation solely based on the information provided by the institution in its LOI and IEA, it is important that the information so provided by the institution should be accurate and factual.

The University submitted the LOI and IEA under the signature and seal of the Registrar who specifically certified to the accuracy of the information provided therein and subject to the condition that if the information furnished was false or misleading, the accreditation granted was liable to be cancelled. Audit Scrutiny of the IEA/report submitted by the University to NAEAB revealed factual inaccuracies as detailed below:

- **Statement of Compliance (Central and State Universities):** The University certified that it was governed by the UGC Regulations, 2010 and the UGC Ph.D. Regulations, 2009 and that it had complied with all its provisions. Audit scrutiny revealed that the University did not comply with the following UGC regulations:

- **Regulation No. 1.1.1 of UGC Regulations, 2010** prescribing the qualification for appointment of teachers in the faculty of Agriculture and Veterinary Sciences as per ICAR norms, as discussed in paragraph 2.5.2.3.

- **Regulation No. 6.0.11 of UGC Regulations, 2010** prescribing establishment of an Internal Quality Assurance Cell (IQAC) in all Universities/Colleges as per the UGC/National Assessment Accreditation Council (NAAC) guidelines. The functions of IQAC inter-alia include development and application of quality benchmarks, dissemination of information of various quality parameters,

documentation of various programmes/activities of the university leading to quality improvement, development of quality culture in university etc. But the University did not establish IQAC as per UGC/NAAC guidelines. As a result, a proper system to document research data in terms of research papers published, did not exist in the University, as discussed in paragraph 2.5.3.1. The role of IQAC in the University was limited to the documentation and record keeping of career advancement scheme of the teaching staff.

■ **Regulation No. 13.1 of UGC Regulations, 2010** prescribing the procedure for appointing teachers on contract, as discussed in paragraph 2.5.2.3.

■ **UGC Ph.D. Regulations 2009 superseded by UGC Ph.D. Regulations 2016** prescribing the procedure for award of Ph.D. degree, as discussed in paragraph 2.5.2.9.

- **Action taken report on the last recommendation/observation of NAEAB:** NAEAB had recommended that recruitment to the Officers' positions should be taken up periodically. In the proforma for IEA the University stated that it conducted recruitments to the Officers' positions regularly, as and when the positions fell vacant. Audit observed that the University did not conduct regular recruitment of Officers, as discussed in paragraph 2.5.1.2.
- **Fifth Deans' Committee recommendations:** The University stated that it implemented in full, the recommendations of the Fifth Deans' Committee including the recommendations on minimum requirements for establishment of new college in agriculture and allied disciplines. Audit noticed that the University did not comply with the recommendations on establishment of new colleges in respect of the College of Agriculture, Ambalavayal, as discussed in paragraph

2.5.2.5.

- **Conduct of Academic audit:** Audit noticed that the IQAC of the University did not conduct academic audit as prescribed in NAAC Guidelines. However, in the proforma for IEA the University stated that it had conducted academic audit in the last two years.

Thus, the University undermined the accreditation process by not disclosing the actual position in the IEA and the Compliance Statement submitted for renewal for accreditation. It is also pertinent to note that while granting accreditation (September 2020), the NAEAB also awarded the University with 'B' grade (out of possible four grades of A+, A, B and C) corresponding to a score of 2.90, which placed it among the Category III Universities. According to the University Grants Commission (Categorisation of Universities (only) for Grant of Graded Autonomy) Regulations, 2018, Category III Universities are eligible for the least autonomy. Further, accreditation was not granted to 14 of its programme and two colleges Appendix III (5).

The Government in its reply (October 2020) claimed that, the Peer Review Team of ICAR had visited all the campuses and had physically verified the facts stated in the IEA and LOL.

The reply of the Government is not tenable, as University has underplayed its lapses by merely referring to the Peer Review Team exercise. Further, the documents furnished by the University did not show any indication that the Peer Review Team had verified the process followed for regular and contract recruitment of teachers as pointed out by audit, compliance to UGC Ph.D. Regulation 2009 and adherence to the Fifth Deans' Committee recommendation in respect of new College of Agriculture at Ambalavayal.

[Audit Paragraphs 2.5.2 to 2.5.2.2 contained in the Report of Comptroller & Auditor General of India for the year ended 31st March, 2019 (Economic Sector)]

[Notes received from the Government on the above audit paragraph are included as Appendix-II]

Excerpts from the discussion of Committee with officials concerned

15) While considering the observation related to the enrollment of students, the Principal Secretary & APC, Agriculture Department informed that the enrollment issue had been resolved. The Committee accepted the reply.

16) Committee enquired about audit observations on delay in applying for renewal of accreditation and inaccuracies in the application for renewal for accreditation, the Principal Secretary & APC, Agricultural Department informed that there was a delay in the renewal of accreditation during the audit period, but at present there were no such issues.

17) In the discussion related to the audit observations on Statement of Compliance (Central and State Universities) and regulation No 1.1.1 of UGC Regulations, 2010 the Director of Research (in-charge), Kerala Agricultural University informed the Committee that as per the UGC norms, NET was not necessary for persons holding Ph.D. But as per the notification dated 03.03.2016 issued by Agricultural University for the post of Assistant Professor, NET was included as an additional qualification. The Committee noticed that many candidates had lost their chance as the notification does not describe that Ph.D holders could apply even though they did not have NET. Then the Director of Research (in-charge), Kerala Agricultural University supplemented that subsequent notification was issued by the University in 2020 in line with the relevant UGC norms. The Committee accepted the reply furnished by the Department.

18) While considering the audit observation related to the regulation No. 6.0.11 of UGC Regulations, 2010, Director of Research (In-Charge), KAU informed that an Internal Quality Assurance Cell had been constituted to realize the problem in that regard. In

connection with the objection related to regulation No. 13.1 of UGC Regulations, 2010, Director of Research (in-charge), KAU informed that the above observation would be described while considering audit para 2.5.2.3.

19) Regarding the observation related to UGC Ph.D Regulations 2009 superseded by UGC Ph.D Regulations, 2016, Director of Research (in-charge), KAU informed that the above observation would be described while considering audit para 2.5.2.9. The Director of Research (in-charge), KAU also informed that its explanation regarding the Action Taken Report on the last recommendation/observation of NAEAB was given in the reply of para 2.5.1.2

20) Regarding the Fifth Deans' Committee Recommendations the Director of Research (in-charge), KAU informed that the audit objection was regarding the non compliance of ICAR guidelines in appointments. As per ICAR guidelines, the staff in the research station within 5 km would also be considered as teaching staff and the College of Agriculture, Ambalavayal follows the same staff pattern. The Principal Accountant General informed that the Agricultural University stated that it had fully implemented the recommendations of the Fifth Deans' Committee. But the College of Ambalavayal was shown by the audit as an example to clarify that the University had not complied with all the recommendations of the Fifth Deans' Committee. The APC & Principal Secretary, Agriculture Department informed the Committee that they had implemented the recommendations in full. The Committee accepted the reply furnished by the Department.

21) When the Committee enquired the reason for claiming in the IEA proforma that it had conducted academic audit without actually performing the audit, the Principal Secretary & APC, Agriculture Department informed that the C&AG observed that the academic audit, as per NAAC guidelines, had not been performed. He explained that

Kerala Agricultural University operates under ICAR accreditation, and thus, audits based on ICAR norms were being conducted in a timely manner, and the mandatory compliance of NAAC norms were not entitled anywhere. He added that inspections related to accreditation for the year 2024 were commencing next week like every year and most of the universities in agricultural sector were following ICAR accreditation.

22) The Principal Secretary, Agriculture Department informed that KAU was ranked first from 2011 to 2016, but it became 15th during the latest inspection. Although there is no decline of academic standards, the ranking was negatively affected by problems in the universities internal administration including faculty shortages.

23) The Committee pointed out that Accountant General's contention was that the Department had given a wrong reply related to the objections pointed out by the audit. The audit stated that even though the Department had replied that the Peer Review Team had understood that the regular/contract recruitment of faculties in Agricultural College, Ambalavayal was in compliance with UGC Ph.D regulations, 2009 and adherence to Fifth Deans' Committee recommendations, the Department had not submitted any reference in connection with that to the audit team. To a query of the Committee regarding IEA, the Principal Secretary and Agricultural Production Commissioner explained that IEA (Institutional Eligibility for Accreditation) was the document prepared by the University for accreditation and the ICAR team had approved the documents. But the audit query was that the documents were not prepared on the basis of NAAC regulation. He added that KAU did not apply for the NAAC accreditation yet. The Principal Accountant General pointed out that while granting accreditation, the NAEAB only awarded B grade to KAU. When asked by the Committee whether NAAC accreditation is needed for getting autonomy to the College, the Agricultural Production Commissioner and Principal Secretary, KAU replied that the grade level had gone up due to the rectification of a number of issues. He added that all the Veterinary and Agricultural Colleges should

operate as per the guidelines of ICAR. The Committee opined that all the Colleges and Universities working under the Higher Education Department were trying to get NAAC accreditation and so the institutions under Agricultural University should also try to get the NAAC accreditation so as to level up their standard. But the Principal Secretary, Agriculture Department remarked that priority is given to get ICAR accreditation, since ICAR co-ordinates agriculture, education and research as well as provides financial assistance. The national institutes related to agriculture and Agricultural Universities of other states mainly accept the certificates with ICAR accreditation.

24) When the Committee asked whether the ICAR funding had been hindered due to any shortcoming, the Director of Research (in-charge), KAU replied that it had not happened so far. There was a direction that the financial benefits including pay revision arrears should be credited to the personal accounts of faculties and details of the same with the list to be submitted to UGC. However Government Order to credit the state share to the PF resulted in loss of UGC grant and consequently resulted in additional liability to the University. He further informed that financial benefits including pay revision arrears could not be ignored for any reason. The Committee accepted the reply furnished by the Department.

Conclusion/Recommendation

25) No Comments.

2.5.2.3 Manpower Management

The sanctioned employee strength of the University consisting of faculty and other staff is 2,457. The manning levels as of March 2019 against the sanctioned strength is as shown in the following table:

Table-2.4: Staff strength position

	Sanctioned Strength	In-position	Vacancy	Vacancy Percentage
Faculty	766	342	424	55
Other staff	1,691	1,219	472	28
Total	2,457	1,561		

The recruitment of other staff is carried out by the Kerala Public Service Commission (KPSC). The recruitment of faculty members is conducted by the University directly. The University Manual 2001 (Chapter VII para 4) recommends the recruitment be a continuous process to fill up vacant positions with fixed schedules in order to avoid stress on regular employees. A total of 166 teachers¹⁶ retired during the audit period 2014-15 to 2018-19. Audit observed that the University initiated recruitment process in 2016 after eight years of the previous recruitment in 2008. The recruitment process initiated in 2016 was finalised only in 2019. As a result, the strength of the regular faculty was reduced to below 50 per cent in its colleges, research stations and KVKs as shown in the following table. The main reason for arising of these vacancies was the failure of University to carry out regular recruitment against vacancies arising due to normal retirement.

Table-2.5: Faculty staff strength position

	Sanctioned Strength	In-position (regular faculty)	Vacancy	Vacancy Percentage
Colleges	415	176	239	58
Research Stations including AICRP	302	144	158	52
KVKs	49	22	27	55
Total	766	342	424	55

The University filled, on an average, 47 per cent of the sanctioned posts of teachers in its colleges through postings made on contract/daily wage basis during the years 2014-19. Audit observed the following lapses in the recruitment process initiated in the year 2016 and in the appointment of contract teachers:

¹⁶ In 2014-15 : 22, 2015-16 : 46, 2016-17 : 47, 2017-18 : 28 and 2018-19 : 23.

- The UGC Regulations, 2010¹⁷ issued on 30 June 2010 and notified on 18 September 2010 prescribing the minimum standards for appointment of teachers and other measures for maintenance of standards in higher education stipulates that in respect of faculty of agriculture and veterinary science, the norms/regulations of ICAR shall apply. Accordingly, in December 2011, ICAR modified the norms for recruitment of Assistant Professor in respect of faculty of agriculture and veterinary science, according to which, NET¹⁸ along with one publication in National Academy of Agricultural Sciences (NAAS)¹⁹, New Delhi rated refereed journal was made compulsory for candidates having Master's degree for being recruited to the post of Assistant Professor and equivalent in the disciplines in which NET is conducted. The main objective of NAAS is to recognise and promote excellence of individual scientists in fields of agricultural sciences including crop husbandry, animal husbandry, fisheries, agro-forestry and interface between agriculture and agro-industry. NET could be waived off for candidates holding Ph.D. degree, provided it was done with course work as prescribed by the UGC Regulations 2009 and the candidate had at least two full length publications having a NAAS rating of not less than four on the last date of submission of application. Those candidates with Ph.D. degree without course work would not qualify for NET exemption. The modified norms had prospective effect from 01 January 2012. Universities which failed to implement NET

17 University Grants Commission (Minimum Qualifications for Appointment of Teachers and other Academic Staff in Universities and Colleges and other Measures for the Maintenance of Standards in Higher Education) Regulations, 2010.

18 National Eligibility Test.

19 NAAS allots score in the following manner - Category I: Those journals where Thompson Reuters Impact Factor is available, the scores are assigned as 6.00 + Impact Factor with capping on 20.00. Category II: Those journals where Thompson Reuters Impact Factor is not available, the marks are assigned on the basis of information provided by the Publishers in a prescribed proforma and also evaluation of scientific contents of the journals.

essentiality as per the above provision were not to be given development grants by ICAR.

Audit observed that the University diluted the above provision in the recruitment notification issued in March 2016 in which the essential qualification prescribed were Master's degree with NET. Ph.D. was only a desirable qualification not eligible for NET exemption. This was contrary to the ICAR norm. The University thus failed to give due weightage to the research credentials of the candidates stipulated by ICAR. As the research product of the University in terms of the research papers published in scientific journals was below the benchmark, as discussed in paragraph 2.5.3.1, the University should have given emphasis to the research credentials of candidates as required by ICAR.

- According to UGC Regulations 2010, (Regulation No. 13) the qualification and selection procedure for contract appointment of teachers was to be the same as those applicable to a regularly appointed teacher. The selection committee for contract appointment to the post of Assistant Professor was to consist of eight members²⁰ from the field of education. The presence of at least four members, including two outside subject experts was required to complete the quorum.

Audit observed that, the selection committees for the recruitment of teachers on contract basis were not formed as per the UGC regulations. Thus the composition and quorum of the selection committees were not as prescribed. It consisted of only three members against a quorum of at least four and included members from non-academic background also, thus rendering the decision of the selection committee challengeable.

²⁰ Vice-Chancellor who will be the Chairperson of the Committee, three experts in the concerned subject nominated by the VC, Dean of the concerned Faculty, Head/Chairperson of the Department/School, an academician nominated by Chancellor and an academician representing SC/ ST/ OBC/ Minority/ Women/ Differently abled categories nominated by VC.

The Government in its reply (October 2020) contended that the notification for recruitment to the post of Assistant Professors issued in March 2016 was issued in accordance with the Statutes of the University and the relevant UGC norms. It was further stated that the notification also contained a clause at the end stating that 'The mode of selection, applicable reservation, relaxation of age and all other matters relating to the appointment to the post shall be governed by the provisions contained in the University Statutes, UGC Regulations, 2010 and orders issued by the Government from time to time' making the notification compliant to the UGC regulations.

The reply is not tenable as the University notification for recruitment of regular faculty was a dilution of the essential qualification prescribed in the UGC regulations and binding on the University. Further, the subsequent recruitment notification issued (February 2020) by the University, is in line with relevant UGC regulation.

Regarding the recruitment of teachers on contract basis, it was stated that the University will ensure that the selection procedure will be the same as those applicable to a regularly appointed teacher as per UGC regulations.

In the application for accreditation (February 2019) submitted by the University it was, however, claimed that the University had complied with all the provisions of the UGC regulations as discussed in paragraph 2.5.2.2. This indicates that the University as an institution and the Registrar of the University who submitted the application for accreditation in particular, was uninformed on the regulatory norms governing the University. This reflects poorly on the governance of the University.

[Audit Paragraph 2.5.2.3 contained in the Report of Comptroller & Auditor General of India for the year ended 31st March, 2019 (Economic sector)]

[Notes received from the Government on the above audit paragraph are included as Appendix-II]

Excerpts from the discussion of Committee with officials concerned

26) In relation to the above audit observation, the Principal Secretary & APC informed the Committee that there was shortage of staff even though there were about 700 sanctioned posts. At present, staff strength is only 59% of sanctioned posts. The staffs are given the responsibility of Academic Institution and Substations and so there is no disruption in activities. He further indicated that having at least 600 permanent employees would significantly improve operational efficiency. The Committee inquired the reasons for the shortage of workers in Vellayani Farm. The Principal Secretary, Agriculture Department replied that the number of workers in all the centres exceed the requirements and the financial constraints had created difficulties in recruitment.

27) The Committee noted that, according to UGC regulations, a Master's degree and NET qualification are the prerequisites for applying for the post of Assistant Professor. However, since December 2011, ICAR criteria have stipulated that applicants with a Master's degree must publish at least one article in journals rated by the National Academy of Agricultural Sciences (NAAS), New Delhi, along with having NET qualifications. Additionally, as per UGC regulation 2009, Ph.D. holders must publish two full-length articles in journals rated at least rank four by NAAS as coursework. It was also mentioned that a Ph.D. holder who does not complete coursework is ineligible for NET exemption. But as per KAU's 2016 notification, Master Degree and NET were considered as the compulsory qualification, but Ph.D as a desirable qualification. Then the Committee sought clarification on the Audit observation regarding such activities done against ICAR provision. The APC & Principal

Secretary, Agriculture Department informed that NET qualification was essential to maintain the high standard of teaching. As per notification GA/KI/34376/2012 dated: 03.03.2016 of KAU, applications had been invited for the vacancy of Assistant Professor in various fields and the rank list had been prepared and 277 candidates from that rank list had been appointed. He added that UGC norms had also been followed in the appointment of temporary faculties. The Committee accepted the explanation furnished by the Department.

Conclusion/Recommendation

28) No Comments.

2.5.2.4 Functioning of Libraries

The University has a network of libraries, including a Central Library in the main campus, constituent colleges, RARS, research stations and KVKs. The Kerala Agricultural University Library and Information System (KAULIS) was established in 1995. The KAULIS consists of the Central Library, college libraries in constituent colleges and research stations. It has digitised repository of information on agriculture which includes Crop and Animal Production, Fisheries, Forestry, Nutrition and Rural Development. It facilitates digital access to most of the advanced sources of information like CABI e-Books (<https://www.cabi.org>), CAB Abstracts, KrishiPrabha, Indiatat.com etc. which facilitates knowledge updation for students and faculty.

Consortium for e-Resources in Agriculture (CeRA) provides access to full text of 3,951 journals from reputed publishers like Elsevier, Springer, Annual Review Inc., Wiley etc. Apart from that, users can request for articles to any of the libraries in the consortium through Document Delivery Service. India Agristat, 1,174 e-books and 17 e-book series published by Elsevier were also provided through CeRA.

Krishikosh is a digital repository of accumulated knowledge in agriculture and allied sciences which is maintained by ICAR. Full text of thesis submitted to the University can be accessed through the Krishikosh. The University is an Institutional Member of DELNET (Developing Library Network) which provides access to more than 20 million bibliographic records of books, journals, articles, CDs etc. The Inter Library Loan (ILL) and Document Delivery Services (DDS) are one of the most popular services of DELNET. Indian Digital Ensemble of Agricultural Libraries (IDEAL) is a platform for sharing library holdings through Union Catalogue (AgriCat) of Agricultural University Libraries of Indian National Agricultural Research and Education System (NARES). Bibliographic details of more than one lakh books available in College Libraries and Central Library is available through the IDEAL.

The average daily footfall of students and faculty visiting the library was 51 per cent and 48 per cent in the years 2017 and 2018.

2.5.2.5 Establishment of a new college

The report of the Fifth Deans' Committee released (July 2016) by ICAR recommended measures for improvement of the national agricultural education system and prescribed minimum standards for establishing new colleges of agriculture. These recommendations which were made mandatory by ICAR were linked to the accreditation of institutions and to the release of ICAR grants.

The University proposed (April 2018) to start the new college by upgrading the existing RARS at Ambalavayal subsuming its faculty and infrastructure facilities which was stated to be sufficient for the first two years. Government approved the proposal subject to the condition that no additional fund would be given and no new posts would be created. The College of Agriculture, Ambalavayal started to function (2018) by admitting one batch of 60 students from the academic year 2018-19 onwards.

Audit observed that the faculty strength and the infrastructure facilities available at RARS were far below the requirements recommended by the Fifth Deans' Committee as evident from the following table:

Table 2.6: Facilities required/ available at College of Agriculture, Ambalavayal

Sl. No.	Minimum facilities required as per Fifth Deans' Committee recommendation	Facilities available
1	Five smart lecture halls	Two ordinary class rooms (This was provided with the infrastructure diverted from the project 'Technology Intervention and peoples participation for poverty alleviation in Wayanad district at Ambalavayal' as discussed in paragraph 2.5.3.4)
2	31 teaching staff	15 teaching staff
3	Two hostels (separate for boys and girls each with 150 capacity)	No hostel. (Students accommodated in congested trainees' hostel, conference hall and staff quarters)
4	12 full-fledged laboratories	Five under-equipped laboratories (Appendix 2.6)

In the application for accreditation submitted (February 2019) by the University to NAEAB, the University gave an undertaking that it had implemented the recommendation of the Fifth Deans' Committee in full which was contrary to the facts as shown in Table 2.6.

The Government in its reply (October 2020) stated that the University would earnestly take all necessary steps to ensure the minimum standards as recommended in the Fifth Deans' Committee Report, by the fifth year of the establishment of the College i.e., by 2023, when it becomes due for accreditation with the support of the Government.

The reply is untenable because according to the NAEAB's guiding principle, accreditation is granted based on the performance and facilities existing in the colleges for last five years. The Hon'ble Supreme Court has also ruled in Appeal No. 31813 of 2018 against a special petition that it should also be ensured that the courses in the past met the minimum standards prescribed by ICAR. So, the University is bound to adhere to the minimum requirements prescribed by ICAR since the inception of the College.

2.5.2.6 Institution of academic programme

The University instituted a five year academic programme of B.Sc-M.Sc. (Integrated) Degree²¹ in 'Climate Change Adaptation' in its Academy for Climate Change Education and Research (ACCER) during the academic year 2010-11 with a sanctioned strength of 10 teaching staff and a yearly intake of 20 students. The programme, claimed to be the only one of its kind in Asia, and was commenced with expected career prospects including research in State/Central government departments related to agriculture, conservation and natural resource management, animal science, fisheries, forestry, water resources and environmental protection. As of March 2019, 72 students of four batches had passed out from the Academy. Audit examination of the functioning of the Academy revealed the following;

- The University could not make regular appointment of teachers since the inception of the programme as it had not framed statutes for recruitment of regular teaching staff. As a result, classes were handled by teaching staff on contract and visiting staff from other institutions. This resulted in lack of continuity in the academic programme and was creating difficulties in the routine activities (Academic Officer/Hostel Warden/Accompanying students on study tour etc.). Further, the academy is not in a position to explore research funding opportunities due to lack of permanent teaching staff.
- This being a unique degree, the University could not convince potential employers of equivalence of this degree to other similar Master's degree²². As a result, the career prospects of the students were adversely affected. The Master's degree holders of this course were eligible to appear for recruitment exams for common posts only, for which the qualification was general

²¹ It was an integrated degree programme of five year duration leading to award of Master's Degree

²² Like M.Sc (Environmental Science), /M.Sc. (Agricultural meteorology), M.Sc (Meteorology), etc.

undergraduate degree and the position remained the same even after the passing out of the fourth batch (March 2019).

The Government in its reply (October 2020) stated that necessary steps were being taken to frame Statutes and to appoint teachers.

2.5.2.7 Non-compliance with the UGC guidelines on Students' Entitlements

The UGC issued (April 2013) 'Guidelines on Students' Entitlements' to all universities with a view to make the students aware of their entitlements along with other student related services and also to simplify the procedure for redressing grievances. It was mandatory for every college/university to publish these guidelines in full in their prospectus and also to post it on the homepage of its website. The Guidelines, among other things, provided for the following students' entitlements:

- Publishing a document, known as 'Prospectus', specifying the curricula including syllabi, names, academic profile and status of the faculty, mode and frequency of evaluation, duration of the course, academic calendar, comprehensive information about fees or charges of any kind and refund rules.
- Disclosure of full and correct information about any institution of higher education in which the students study or propose to study. Every college/university must disclose in the prospectus and on its website information regarding its status, its affiliation, accreditation rating, physical assets and amenities, membership of governing bodies and minutes of the meetings of bodies like Academic Council/Executive Committee, sources of income and the financial situation and any other information about its functioning necessary for a student to make a fully informed choice.

Audit noticed the following:

- The University did not publish the guidelines in the prospectus. Instead it published an illegible copy of the guidelines on the website. Publishing of the prospectus in this University is done on the authority of the Academic Council.
- The name, academic profile and the status of the faculty were not given in the prospectus.
- The status of available physical assets and amenities was not disclosed in the prospectus.

The Government in its reply (October 2020) stated that all the information required as per the guidelines were made available in the website and continuously updated.

The reply of the Government is not tenable as the guidelines require that the information should be published in the prospectus which is an authoritative document. Further, the web page of the College of Agriculture at Ambalavayal does not provide the actual status of infrastructure and the web page of ACCER does not provide full profile of the faculty members.

2.5.2.8 Conduct of examinations

Integrity of the process of conducting examinations which culminates in the award of marks/grades/certificates is of highest concern as it has a bearing on the status of both the institution/ university that conducts the examination and the students. Hence, a system should be in place to prevent any possible irregularities in the conduct of examinations.

According to the Act (Section 16(m)), the Executive Committee is responsible for

the conduct of examination and declaration of results based on the Regulations framed by the Academic Council for conduct of examinations. Further, Section 52 of the Act require the Academic Council to frame regulations on the duties of examiners. The University did not notify any Regulation in this regard.

Audit noticed the following:

- Access to the premises of the University press where question papers are printed was not regulated by maintaining a record of visitors to the press.
- No restriction was placed on the use of mobile phones or other recording devices within the Press which can compromise the secrecy of question papers.
- The blank answer sheets printed at the Press were neither machine numbered nor barcoded, as a result they could not be distinguished.
- The University did not issue any guidelines regarding the accounting of blank answer sheets.

The Government in its reply (October 2020) stated that Regulations prescribing the procedure for the conduct of examinations and duties of examiners would be formulated and that corrective action was initiated on the audit observations regarding printing of question papers and accounting of blank answer sheets. Further, in the exit conference (October 2020), the University stated that CCTV cameras were installed in the press.

2.5.2.9 Non-compliance to UGC Regulations in the award of Ph.D. degree

Government of India, Department of Higher Education, had instructed (November 2008) the UGC under Section 22 of the UGC Act, to frame and notify regulations for the award of Ph.D. degree. Accordingly, UGC notified and published in the Gazette of India (11 July 2009) the UGC (Minimum Standards and Procedure for

Award of M.Phil./Ph.D. Degrees) Regulations, 2009. This was superseded by the UGC (Minimum Standards and Procedure for Award of M.Phil./Ph.D. Degrees) Regulations, 2016. These Regulations, inter alia, prescribed that:

- All Universities shall admit M.Phil./Doctoral students through an entrance test conducted at the level of individual University.
- The University shall issue a Provisional Certificate to the effect that the Degree was awarded in accordance with the provisions of the aforesaid UGC Regulations.

Audit scrutiny revealed the following:

- The University did not conduct an entrance test, instead admitted students to the Ph.D. course on the basis of an interview and the academic merit of the applicant. 143 Ph.D. degrees were awarded by the University to such students during the period 2014-15 to 2018-19.
- The University did not issue provisional certificate as prescribed in the UGC Regulations.

In the order issued (March 2010) by Government of Kerala for implementing pay scales to university teachers and in subsequent clarifications, Government authorised grant of incentives to holders of Ph.D./M.Phil. degree and other higher qualifications. The grant of incentive was, among other things, subject to the condition that the Ph.D. degree should have been awarded by a University in accordance with the provisions of UGC Regulations, 2009.

Audit scrutiny revealed that the University had granted advance increments to its faculty members who were directly admitted to its Ph.D. programme and awarded Ph.D by the University. The award of Ph.D. by the University was not according to the provisions of the UGC Regulations, 2009 in that, the University

had neither conducted an entrance exam nor issued provisional certificate as mandated under the Regulations. The University also granted advance increments to those teaching staff who possessed Ph.D. degree from other universities. The provisional certificate submitted by them did not conform to the UGC regulations, as the same did not indicate that the Degree was awarded in accordance with the provisions of the UGC regulations.

The Government in its reply (October 2020) stated that, it would conduct an entrance test for admission to Ph.D. as mandated in UGC regulations, from the 2020 Academic year onwards. It was also stated that action would be taken to review the advance increments granted, if any, in contravention of Government order and recoveries would be effected. In the exit conference (October 2020), the Vice-Chancellor stated that the admissions to the Ph.D. programme were based on the ICAR guidelines which permitted admission of students on the basis of entrance examination or on the merit of the applicant at the Master's degree level or a combination of both.

The contention of the University that the admissions were based on the ICAR guidelines is not tenable, as ICAR guidelines cannot supersede the UGC regulations.

[Audit Paragraphs 2.5.2.4 to 2.5.2.9 contained in the Report of Comptroller & Auditor General of India for the year ended 31st March, 2019 (Economic sector)]

[Notes received from the Government on the above audit paragraph are included as Appendix-II]

Excerpts from the discussion of the Committee with officials concerned

29) While considering the audit observation regarding the functioning of libraries and establishment of a new college, the Director of Research (in-charge), KAU

informed that 15 Departments had started functioning in KAU and also 45 posts had been created newly and thus the problem of shortage of faculties had now been resolved. He added that application for fresh accreditation could be done only after the completion of the course as well as the declaration of result of examination of first batch. He also informed that currently the Agricultural University is having accreditation and inspection team would arrive shortly for the inspection in connection with the accreditation from 10th June, 2024. The Committee accepted the explanation furnished by the Department.

30) Regarding institution of academic programme, the Committee enquired whether the lack of permanent faculties created any problem for teaching the course on 'Climatic Change Adaptation'. The Director of Research (in-charge), KAU informed that ten posts had been deployed in colleges for teaching the said integrated course on climate change adaptation. When the Committee further enquired about the equivalence of the master's Degree with other Universities, the Director of Research (in-charge) informed that equivalency would be given if 90% similarity was noted in comparison with other universities curricula.

31) During the discussion of the audit para on non compliance with the UGC guidelines on students' Entitlements, the Principal Secretary & APC, Agriculture Department informed that the guidelines were notified and published in the Government of India Gazette. The Committee accepted the reply furnished by the Department.

32) In response to the queries regarding the conduct of examinations, the Principal Secretary & APC, Agriculture Department clarified that the examination pattern was incorporated as part of the respective course regulations. To a further query of the Committee regarding the University Examination Manual, he added that the university examination manual would be revised whenever a new programme is introduced and it was last updated in the previous academic course. The Committee accepted the reply

furnished by the Department.

33) When the Committee enquired about the reason for admitting students to Ph.D programmes without conducting Entrance test, the Director of Research (in-charge), KAU replied that currently the admissions to Ph.D programmes were through an Entrance test conducted by ICAR, and steps were also being taken to issue provisional certificates as per UGC regulations. The Committee accepted the reply furnished by the Department.

Conclusion/Recommendation

34) No Comments.

2.5.3 Research

The research initiatives undertaken by the University are focused on increasing the productivity of crops currently grown in the State. The research agenda is set through consultations with the farming community and the extension personnel and is based on need assessment by the faculty, the State and National level agencies and institutions engaged in development and research.

The University has officially released 320 varieties of different crops including 121 varieties of rice, the staple food crop of the State. The rice varieties 'Jyothi' and 'Uma' released by the

The University has released more than 300 varieties of different crops. This includes 121 varieties of rice, the staple food crop of the State. Its rice varieties 'Jyothi (PTB39)' and 'Uma(MO16)' occupy more than 80 per cent of the cropped area of the State.

University in 1974 and in 1998 respectively, occupy more than 80 per cent of the cropped area of the State. During 1980s the University identified a bio-control agent called *Cyrtobagus salviniae* for successful control of the aquatic weed (*Salvinia molesta*) which infested the water bodies of the State. 'Keramithra', a coconut dehusking tool

invented during the 1990s and patented by the University is one of the most popular inventions of the State.

The research projects in Kerala Agricultural University are mainly funded by the State

'Keramithra', a coconut de-husking tool invented and patented by the University is one of the most popular engineering inventions of the State.

Government, ICAR, Indian Council for Forestry Research and Education, Directorate of Biotechnology, Department of Science and

Technology and the Kerala State Council for Science Technology and Environment. The projects are implemented by the scientists working in the colleges and research stations of the University. These scientists are also discharging extension and teaching duties. Post graduate and doctoral research projects also contribute to the research outcome.

The Director of Research is in charge of the research management in the University and is supported by nine Associate Directors of Research (one each located in five zones and four at the Headquarters). There are three faculties, namely Agriculture, Forestry and Agricultural Engineering. There are 24 subject specific Project Coordination Groups, 19 in agriculture, two in Forestry and three in Agricultural Engineering. All the projects, including PG and Ph.D. projects, are coordinated by the Professor (Research Co-ordination).

Audit analysed the performance of the University in areas of research product, impact and excellence, implementation of selected projects and in emerging areas of Intellectual Property Management. The audit observations are discussed below:

2.5.3.1 Research Product

In order to maximise the benefits from research, the results of the research activities must be disseminated through publications at the earliest and in the most effective

manner. Publication of research article in journals is a criterion considered for appointment of faculty and evaluating their performance for career advancement. It is also a mandatory requirement for the award of Masters/Doctoral degrees and an important factor of consideration for ranking of Universities by various agencies. The quality of a research article is relative to the quality of the journal in which it is published.

In agriculture and allied subjects, the quality of a research article is determined by the score allotted by the NAAS to the journal in which it is published. According to the data on research papers submitted by the University to NAEAB for accreditation, a total of 689 papers were published during the period 2014–2018. The Audit findings on the analysis of the data are shown in the following table:

Table-2.7: Details of research papers published

Year	No. of papers published as per the data submitted by University	Repetition of papers noticed	Actual No. of papers published (2)-(3)	Published in Journals			Predatory ²³	Conference papers/ News letters
				With NAAS score below 5	With NAAS score of 5 and above	Not rated by NAAS		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
2014	17	0	17	8	7	1	1	0
2015	62	4	58	29	24	4	0	1
2016	187	6	181	96	45	15	22	3
2017	219	40	179	85	64	18	10	2
2018	204	27	177	66	78	18	15	0
Total	689	77	612	284	218	56	48	6

Details at column Nos. 3 to 9 were obtained on analysis of the item at column No.2

- The fact that 77 out of the total 689 (11 per cent) research papers included in the list submitted to NAEAB were duplications indicates lack of proper system of

²³ Verified from the following URL [https://web.archive.org/web/20170111172309/https://scholarlyoa.com/individual-journals/as mentioned in the UGC public notice dated 31 st July 2019](https://web.archive.org/web/20170111172309/https://scholarlyoa.com/individual-journals/as%20mentioned%20in%20the%20UGC%20public%20notice%20dated%2031%20st%20July%202019).

research data management in the University. As per UGC Establishment and Monitoring of the Internal Quality Assurance Cell in Universities (2012-2017), the IQAC is responsible for the documentation of various programmes/activities of the University leading to quality improvement. As research papers are a key quality indicator, the IQAC of the University should have developed an organised methodology of its documentation. The deficiency in the functioning of IQAC is discussed in paragraph 2.5.2.2.

- The University does not have a procedure to verify the quality of journals in which the works are published by its faculty and students. This is evidenced from the fact that 104 (17 *per cent*) out of the 612 publications showcased by the University as its achievement were in non-NAAS rated/ predatory journals²⁴. This is also an indication that the University has not adopted the ICAR Guidelines for Internal Evaluation and Forwarding Research Papers to Scientific Journals and Data Management in ICAR Institutes which recommends stringent evaluation before submission of manuscripts to research journals.
- Of the 502 research papers published in NAAS rated journals, 284 (57 per cent) were published in journals having a score of five or below. They do not qualify for either ICAR accreditation or ranking.

The minimum benchmark adopted by ICAR for ranking of agricultural universities in 2017 and 2018 was 0.6 papers²⁵ per faculty per year, published in journals having NAAS

24 A predatory journal is a publication that actively asks researchers for manuscripts. They have no peer review system and no true editorial board and are often found to publish mediocre or even worthless papers. They also ask for huge publication charges.

25 As per the criteria fixed by NAAS, the number of research papers per faculty is to be calculated by dividing the total number of research papers published by the faculty members of the University by the total number of faculty members. If the number of research papers per faculty is less than 0.6, no marks are awarded and for those above 0.6, marks are awarded based on a slab fixed by NAAS. Hence, the minimum bench mark fixed for the obtaining mark is 0.6.

score of above six. Audit mapped the research papers to individual faculty member authors and found that 139 (38 per cent) out of the 367 faculty members as on 30 October 2017, including 37 faculty members posted at various research stations, did not author/co-author even a single research paper during the period 2014 to 2018. This contributed to low productivity per faculty in terms of research papers published.

The Government in its reply (October 2020) stated that repetitions were compilation errors made during the effort to make the list as exhaustive as possible, and that individual faculty members were asked to furnish a list of publications for the given period. It was further stated that there was a decline in the number of papers published in Non-NAAS rated/predatory journals in proportion to the total numbers, indicating heightened awareness and that a single criterion like number of papers published would neither be comprehensive nor adequate enough to capture performance/contribution of the faculty members. In the exit conference (October 2020), the Vice Chancellor contended that the faculties were engaged in teaching, research and extension activities, therefore papers per faculty should be considered as a criteria only for those faculties engaged in research activities instead of considering the total strength of the faculty.

The reply of the University confirms the audit observation regarding lack of effective system for research data management and lack of procedure to verify the quality of journals in which the papers are published. The view expressed in the exit conference cannot be acceded to, as the criteria adopted by audit was the same as that adopted by ICAR for ranking purposes, in which, research paper per faculty is determined taking into consideration the total strength of the faculty irrespective of their engagement in teaching, research or extension.

2.5.3.2 Research Excellence

For ranking of agricultural universities, ICAR evaluates their research excellence by considering, among other things, their achievement in release of crop varieties, granting of patents (discussed in para 2.5.3.3), etc. Audit examined the achievement of the University in the above mentioned areas and observed the following;

Varieties released and notified: The State Seed Sub-Committee under the Department of Agriculture and Farmers' Welfare, Government of Kerala released 47 varieties of crops developed by the University during the period 2014-2018. However, the State Seed Sub-Committee could not initiate action for notification of these varieties under the Seeds Act, 1966 as the University failed to submit the notification proposal.

The notification is made by the Central Government on the recommendation of the Central Seed Committee. The varieties accepted for release by the State Seed Sub-Committee has to be submitted to the Central Sub-Committee on Crop Standards, Notification and Release of Varieties for notification. For this, the breeder (the University) concerned should submit sufficient copies of the notification proposals in the prescribed proforma to the State Seed Sub-Committee for onward transmission to Central Sub-Committee. This inter-alia includes deposition of seed material to Gene Bank, NBPGR²⁶, New Delhi.

Audit observed that the University failed to submit the notification proposal despite repeated requests from the Department of Agriculture. The Department of Agriculture can popularise only the notified varieties. In the absence of notification, such newly released varieties could not be included in the seed plan of the Department for procurement of seeds and supply to farmers free of cost.

The Government in its reply (October 2020) stated that notification of varieties involves

26 National Bureau of Plant Genetic Resources

additional data generation by DNA fingerprinting of varieties. The University has initiated activities in this direction. A proposal for DNA fingerprinting of all varieties as a prerequisite for notification has been developed and work is in progress.

2.5.3.3 Intellectual Property Management

India as a member of the World Trade Organisation (WTO) is obliged to comply with the Agreement on Trade Related Aspects of Intellectual Property Rights (TRIPS Agreement) which requires the member countries to provide for protection of intellectual property rights (IPRs) in one form or the other, in all fields of technology including agriculture. The IPR, among other things includes patents, protection of plant varieties and Geographical Indication (GI) of Goods. The study of Intellectual Property Rights is a course included in the syllabus of B.Sc.(Hons.) Agriculture and is a compulsory course for various disciplines of M.Sc. (Agriculture) programme of the University.

The University formed an Intellectual Property Rights (IPR) Management Cell in 2003 with the aim of (i) Protection and management of the IPR in Agriculture, (ii) Protection of Farmers' rights, Breeders' rights, patents and crop varieties, (iii) Protection of Geographical Indications, (iv) Development of policy guidelines for IPR and Transfer of Technology in the University, (v) Empowering of farmers, students and faculties to address IPR issues and (vi) organising awareness programmes. The ICAR released (2006) Guidelines for Intellectual Property Management and Technology Transfer/Commercialisation and recommended their adoption by the State Agricultural Universities suitably for internal use. Audit observed the following shortcomings in the Intellectual Property Management of the University:

➤ Patents²⁷

ICAR Guidelines prescribe that all research results which are patentable under law and

²⁷ It is an authority or license that confers a right or title for a set period, especially the sole right to exclude others from making, using, or selling an invention. In India, patents are governed by the Patents Act, 1970.

have scope for technology transfer or for advancement of basic and strategic research, should be taken up for patent protection. The technologies developed by the University as a result of its research activities need to be protected against unauthorised use/exploitation by other agencies within and outside the country for commercial gains. Patents obtained under the Patents Act, 1970 offer such protection.

Audit noticed that during the period from 2014-15 to 2018-19 the University developed 16 products²⁸ and transferred their technology, but did not apply for patents except for five of them. Thus, 11 technologies transferred by the University were not protected by applying for patents.

The Government in its reply (October 2020) contended that obtaining of patent required five years to six years and that the long wait for completion of the patenting formalities before the technology could be transferred would render many technologies irrelevant.

The reply is not tenable as a patent application affords protection to the invention from the date of its filing. The University had applied for patents in respect of five products before transfer of technology thus protecting their patent. However, the technology in respect of remaining 11 products were transferred without applying for patent thus exposing the technology to unauthorised use/exploitation by other agencies as mentioned above.

➤ Protection of plant varieties

Plant varieties cannot be patented in India under the Patents Act, 1970 but they

28 Technologies developed by the University - i) Veggie wash, ii) Ayar, iii) Osmovac dried Intermediate Vacuum dried Nendran Banana, iv) Sampoorina Rice micronutrient formulation, v) Sampoorina Vegetable micronutrient formulation, vi) Sampoorina Banana micronutrient formulation, vii) Tuber fortified cold extruded pasta/noodles products, viii) Liquid fertiliser from waste hair, ix) Kerasuraksha coconut climber, x) Coconut collector, xi) Palm basin digger, xii) Trichoderma & Pseudomonas, xiii) Banana Bunch covering device, xiv) KAU weed piper, xv) Jackfruit products, xvi) Bioreactor using high rate bio-methanation.

can be protected by registering them under 'The Protection of Plant Varieties and Farmers' Rights (PPV&FR) Act, 2001'. The PPV&FR Act, 2001 allows registration of four types of plant varieties, such as new variety²⁹, extant variety³⁰, farmers' variety³¹ and essentially derived variety³². The varieties requiring registration should fulfill the criteria of distinctiveness, uniformity and stability (DUS) and should have a single and distinct denomination.

Audit noticed that the University has not initiated action for registration of any of the plant varieties under the PPV&FR Act, 2001 so far (March 2019) despite releasing over 300 varieties of different crops. As a result, the University cannot opt for any remedial measure against unacknowledged/unauthorised use of the varieties developed by it.

The Government in its reply (October 2020) stated that registration of plant varieties under the PPV&FR Act will be taken up on priority basis.

➤ Geographical Indication of Goods

The protection of agricultural goods indicated to specific geographical territories/regions is governed by the Geographical Indication (GI) of Goods Act 1999. GI is an indication that the goods being commercialised under that indication have

The Intellectual Property Rights (IPR) Cell of the University has been at the forefront of conserving unique products of Kerala agriculture and getting them granted Geographical Indication (GI) registration. The University is the 'registered proprietor' of five GIs and has facilitated obtaining GIs of another five. In recognition of these efforts, the IPR Cell of the University was adjudged as the 'Top organisation for best facilitation of registration of GI and promotion of GI in India' in 2018 by the Department of Industrial policy, Promotion and Intellectual property, Government of India.

29 A variety which is not in public domain in India earlier than one in the case of trees or vines earlier than six years, or in any other

30 A variety which is notified under Seed Act, 1966 or a variety a farmers' variety or any other variety which is in public domain is

31 A variety which has been traditionally cultivated and evolved by the farmers in their fields or a variety which is wild relative or land race of a variety about which farmers possess common knowledge.

32 An "essentially derived variety" shall be said to be essentially derived from such initial variety when it is predominantly derived from such initial variety, or from a variety that itself is predominantly derived from such initial variety, while retaining the expression of the essential characteristics that result from the genotype or combination of genotype of such initial variety and it is clearly distinguishable from such initial variety. An essentially derived variety conforms to such initial variety that results from the genotype or combination of genotype of such initial variety.

originated from a definite geographical territory either as an agricultural produce (e.g. Nagpur orange) or as a natural produce like from mining (e.g. Mussourie Rock Phosphate) or by manufacturing (production or processing or preparation e.g. Banarasi saree) or some specific local brews of tribal areas (e.g. Agrekapetha) and it has a special quality or reputation or other characteristics attributable to that origin. GI is the collective intellectual property of the entire community or society or organisation of the geographical region to which the goods belong.

The IPR Cell of the University has facilitated various farmers' collectives/ organisations in the State to obtain GIs for their agricultural produce. The University is the 'registered proprietor'³³ of five³⁴ GIs and has facilitated obtaining GIs of another five³⁵. The efforts of the University on this front have won many accolades, the most recent being the National Intellectual Property Award 2019 instituted by the Indian Intellectual Property Office under the Ministry of Industries and Commerce.

Audit, however, noticed that the IPR Cell was not effective in preventing infringements on its GI. The University is a registered³⁶ proprietor of the GI 'Wayanad Jeerakasala Rice' a traditional aromatic rice variety cultivated in the Wayanad district of Kerala. Any company or person who wishes to use this GI tag has to get themselves registered as 'authorised users' under intimation to the University. There are no 'authorised users' for the GI 'Wayanad Jeerakasala Rice'

33 "registered proprietor", in relation to a geographical indication, means any association of persons or of producers or any organisation for the time being entered in the register as proprietor of the geographical indication.

34 Pokkali rice, Vazhakkulam Pineapple, Central Travancore Jaggery, Wayanad Jeerakasala Rice and Wayanad Gandhakasala Rice.

35 Kaipad Rice, Chengalikodan Nendran Banana, Marayoor jaggery, Tirur Vettila and Nilambur Teak

36 Registered in the year 2009.

as of July 2020. Audit observed that at least two companies which are not 'authorised users' of the GI 'Wayanad Jeerakasala Rice' were marketing the rice branding it as 'Jeerakasala' and also referring to it as 'Wayanadan Kaima' on the packing. Under the product description, the website of one company described it as 'Jeerakasala rice, also known as Wayanadan Kaima, is popular traditional small aromatic non-basmati rice, cultivated by the farmers in Wayanad District in Kerala'. This is an indication of a potential infringement of the GI granted to the University.

The Government in its reply (October 2020) stated that the University's contribution in terms of GI registration has been the best in the country and has been nationally acclaimed. However, it may be noted that it is only a facilitator in most GI registrations and cannot address legally. It is the responsibility of the owners of the GI registration, the community of practice in our case to proceed against such infringements. The instance referred to involving 'Jeerakasala' rice in Wayanad calls for in-depth investigations of scientific and legal nature before establishment of infringement.

The contribution of the University in obtaining Geographical Indication is noteworthy and also it cannot address legally infringement cases in which, it is only a facilitator. However, the reply is not tenable in the instance of 'Wayanad Jeerakasala Rice' as it is the 'Registered Proprietor' and not a facilitator. The University's inability to either confirm or deny potential infringement of GI owned by it, when brought to its notice indicates absence of an IP watch system as recommended in the ICAR guidelines.

2.5.3.4 Specific Research Projects

The University formulates new research projects on the basis of the thrust areas

identified by various project groups. Each research project is scrutinised by the respective Project Coordination Groups duly approved by the Faculty Research Council before it is formally commenced. Audit, however, noticed that there was no general guideline governing the implementation of projects.

The University undertook 265 specific research projects with a total outlay of ₹73.06 crore during the period 2014-15 to 2018-19 as detailed below:

Table 2.8: Details of projects undertaken by the University

Funding agency	No. of projects approved during the audit period	Outlay (₹ in crore)	No. of projects completed during the audit period
Government of Kerala	123	22.89	19
ICAR	19	7.31	6
External agencies	123	42.86	25
Total	265	73.06	50

Audit selected 54 out of the 265 research projects for detailed review and noticed that four of them failed to achieve the objectives envisaged.

➤ The following projects did not achieve the objectives due to defective planning:

- The project "Development of entrepreneurship and sustainable livelihood for SC/Tribe women through projection of tissue culture plants" which involved developing 15 lakh banana plants at an outlay of ₹9.35 lakh funded by State Horticulture Mission (SHM) failed as the physical target fixed was far above the infrastructural capacity provided to achieve it.
- The project "Import of planting material by RARS Ambalavayal" which involved import of high yielding varieties of sub-tropical fruits, cut flowers and other perennials from foreign countries to replace the indigenous varieties could not be implemented, in spite of creation of required infrastructure at a cost of ₹24.28 lakh, due to the failure of the University to get import license from the Ministry of Agriculture &

Farmers Welfare in time.

➤ In the following projects the University deviated from the project guidelines.

- The University decentralised the implementation of the project "Creation of Seed Hub for increasing indigenous production of pulses at RARS, Pattambi" to other 13 research stations without the prior concurrence of ICAR, the funding agency, which resulted in unproductive expenditure of ₹37.47 lakh
- The University diverted the infrastructure worth ₹3.13 crore created for the project "Technology intervention and peoples participation for poverty alleviation in Wayanad district at Ambalavayal" to an entirely different purpose, resulting in non-release of the balance fund amounting to ₹4.55 crore (59 *per cent*) by the Government.

The Government in its reply (October 2020) accepted the audit observation on the first project. Regarding importing Planting materials it was stated that import license having validity of only six months was not applied for as the requisite infrastructure had to be readied first and that the import license had been obtained with effect from 28 February 2020. The reply is not acceptable as the University deviated from the approved DPR of the project which set a time frame of one year for implementation.

In respect of the project on Creation of Seed Hub, the University replied that the reason for decentralisation of production was communicated to ICAR and approval sought in December 2017 but denial of sanction was intimated only in December 2018. The reply is not acceptable, as it was not correct on the part of the University to implement the project in decentralised manner without obtaining

prior approval of ICAR, the funding agency.

Regarding the project on "Technology intervention and people's participation", the University contented that the transfer of infrastructure did not have any impact on other activities but conceded that the resultant delay in implementation had led to non-release of funds. The reply cannot be accepted, as the building constructed for the implementation of the project was being used as class rooms for the College of Agriculture, at Ambalavayal compromising the objective of the project.

[Audit Paragraphs 2.5.3 to 2.5.3.4 contained in the Report of Comptroller & Auditor General of India for the year ended 31st March, 2019 (Economic sector)]

[Notes received from the Government on the above audit paragraphs are included as Appendix-II]

Excerpts from the discussion of the Committee with officials concerned

35) During the discussion of the audit observation on varieties released and notified, the Director of Research (in-charge), KAU informed that the main audit objection was the failure of the university to submit the notification of crop varieties. In the previous notification, the deposition of seed material to NBPGR gene bank and the generation of molecular data were additionally incorporated. It was an expensive process and being implemented through a project costing ₹ 45 lakh and after the completion of that project, the notification process would become easier. He added that about eight varieties had been notified after the audit scrutiny, and the molecular data from 2015 onwards are currently being generated and data generation of about forty varieties were already completed.

36) While considering the audit observation related to Intellectual Property Management the Committee enquired the reason for not applying patents for the 11

out of the 16 products developed by the University. The Director of Research (in-charge), KAU informed that the University had the patent for about 22 products and in the current year four more products also got patents. He added that patent awareness was being provided and actions were being initiated for obtaining patents for more products. He assured the Committee that the exact figure would be provided at the earliest.

37) While considering the audit objection related to protection of plant varieties, the Director of Research (in-charge), KAU informed that steps were being taken for registration of all varieties of crops and the 8 varieties of nutmeg crop developed by the University were notified as 'Farmers Varieties'.

38) When the Committee enquired about the audit observation regarding infringements on geographical indications of Wayanad Jeerakasala Rice, the Director of Research (in-charge), KAU informed that the University had its own limitations in that regard. The GI registration under IPR is in the name of 'Wayanad Jeerakasala Rice', but in the market, the product is being available under the brand name 'Wayanadan Kaima' and 'Jeerakasala Rice'. As per legal opinion, infringement of IPR occurs only if anyone use the name as 'Wayanad Jeerakasala Rice'. He added that Wayanad Jeerakasala Rice is GI tag Protected and similar intervention had been made to make Navara rice also GI tag Protected.

39) While considering the audit query related to the development of entrepreneurship and sustainable livelihood for SC/Tribe woman through projection of tissue culture plants, the Committee enquired the reason for planting 15 lakh banana plants without ensuring sufficient land for cultivation, the Director of Research (in-charge), KAU informed that the said issue had been resolved. A Tissue Culture Lab had also been set up in Vytila Research Station and around 3 lakh banana plants had been developed and distributed through one crore fruit plant distribution scheme of

the State Government. The Committee accepted the reply furnished by the Department.

40) Regarding the audit observation related to the import of planting material by RARS, Ambalavayal, the Committee inquired the reason for importing high yielding varieties of sub-tropical fruits, cut flowers and other perennials from foreign countries instead of indigenous varieties. The Director of Research (in-charge), KAU raised an objection about the audit remark that the University had not applied for an import license. He added that the import license had a validity of six months and if the plants were imported without setting requisite infrastructure, it would be destroyed and due to that reason University had not applied for the license. But later, the import license had been obtained and the project was completed. The Committee accepted the reply furnished by the Department.

41) To the Committee's query about the creation of Seed Hub for increasing indigenous production of pulses at RARS, Pattambi, the Director of Research (in-charge), KAU informed that if the target was limited to the Pattambi Research Station only to produce Certain Pulses Seeds, the project would not take place. So it was decided to decentralize the project to other stations after obtaining permission from ICAR, but the reply was received only after one year. At that time, on the hope of getting concurrence from ICAR, the project implementation was decentralized to 11 research stations, it was withdrawn due to the denial of sanction from ICAR. At present, the Seed Hub project at Pattambi has been completed and the infrastructure facilities have also been developed. When the Committee further enquired about the remarks of C & AG regarding the unproductive expenditure of ₹37.47 lakh regarding that project, the Director of Research (in-charge), KAU denied the objection and informed that an amount of ₹11 - ₹13 lakh had been expended for the decentralization of the project to other research stations. But that decision was withdrawn due to the

objection of ICAR.

42) When the Committee enquired whether there was any exit meeting related to the discussion of the said matter, the Director of Research (in-charge), KAU replied in positive and added that an explanation had already been given in the exit meeting and at present the said project was implemented only in Pattambi research station. Then the Principal Accountant General enquired whether the Department did not agree with the observation of unproductive expenditure of ₹37.47 lakh, the Director of Research (in-charge), KAU informed that the decentralization of project implementation to other research stations cost only ₹11 lakh. When the Principal Accountant General further asked for detailed reply regarding the expenditure, the Director of Research(in-charge) agreed to provide the details.

43) While considering the audit observation related to the technology intervention and people's participation for poverty alleviation in Ambalavayal, the Committee noticed that the University had diverted the infrastructure worth ₹3.13 crore created for the said project to a different purpose resulting in non release of the balance fund amounting to ₹4.55 crore and enquired about the reason for that. The Director of Research (in-charge), KAU informed that when a new college was started in Wayanad district, the rooms constructed for the Ambalavayal project were changed as labs and that was treated as diversion. When the Committee enquired whether any sanction has been accorded for the diversion, he supplemented that it was the decision of the executive committee. The Committee further enquired how the infrastructure created for the implementation of a project could be used for the commencement of a new college. The Director of Research (in-charge), KAU submitted that the diversion did not affect the project implementation and it might be treated as bonafide.

Conclusion/Recommendation

44) No Comments.

2.5.4 Extension Education

The Extension Education Programmes of the Kerala Agricultural University are planned, organised, and coordinated by the Director of Extension (DoE) at the University level as mandated under the Act. The basic objective of

KVK Kannur developed a Production Protocol for rice farming which resulted in enhanced yield of more than three times the state average.

the extension education programme is to make available to the farmers and others through the Government Departments concerned, useful information based on research findings. The extension education activities of the University are implemented primarily through the KVKs and other centres functioning under the DoE. The educational institutions and research stations of the University also implement extension education programmes.

The planned activities of the KVKs include on-farm trials, frontline demonstrations, trainings and extension programmes. Audit selected three³⁷ out of the seven KVKs operated by the University in the State for detailed scrutiny and observed that all of them had achieved their targets in the above activities. A noteworthy activity of the University was the practice of deputing Multi-disciplinary Diagnostic Teams to visit farmers' fields and recommend solutions to various problems reported by them. It has also designed a programme for the public to interact with the faculty about the latest developments in agricultural sector. Another notable achievement was that of KVK Kannur, which developed a production protocol for rice farming from sowing to harvesting and for value addition by processing and branding of organic rice under the Mayyil Grama Panchayath, in Kannur district. As a result, the productivity has enhanced to nine to ten tonnes/hectare as against the State average of 2.9 tonnes/hectare.

ICAR ranks agricultural Universities annually based on various parameters under

³⁷ Kollam, Kottayam and Kannur.

teaching outcome, research and extension. In teaching, parameters with high score include performance of students in national level examinations. In research, parameter with high score include research papers with high NAAS rating. In extension, parameters with high score includes revenue generation. The University was ranked 14 in the year 2016, but its ranking slid to 34 in 2018. In the year 2019, it improved its ranking to 19 mainly aided by the performance of its students in national level examinations.

2.5.5 Financial Management

The University follows a decentralised financial system. The funds of the University are operated and managed in accordance with the provisions of Articles 45 to 47 of the Act. The Government of Kerala, in exercise of the powers conferred by section 63 of the Act, notified³⁸ the first statute (Statute SR. No.815/79) regarding "Finance Accounts and maintenance and management of all University Funds in General". The University amended the above Statute and issued Notification No.GA/8762/A3/83, dated 29 September 1983. The Statute permits the University to follow the Financial and Accounting Rules of Government of Kerala until such time the University prescribes and adopts its own Financial and Accounting Rules. The Kerala Financial Code mandates that every Government servant should see that proper accounts are maintained for all Government financial transactions with which he is concerned exercising specially strict and close control in regard to the maintenance of proper accounts.

The receipts and expenditure of the University for the period 2014-15 to 2018-19 were as follows:

Table-2.9: Receipts and Expenditure during the period from 2014-15 to 2018-19
(₹ in crore)

³⁸ Notification No. GO(MS) No.257/79/AD dated 23 June 1979.

Source of Fund	Description	2014-15	2015-16	2016-17	2017-18	2018-19	Total
Plan	Receipt	31.37	29.17	42.25	38.90	15.00	156.69
	Expenditure	21.55	23.94	20.77	14.24	15.61	96.11
	Excess/ Savings	9.83	5.23	21.47	24.66	-0.61	60.58
Non-Plan	Receipt	208.82	250.53	281.91	324.20	338.09	1,403.55
	Expenditure	216.72	260.06	306.19	335.13	343.00	1,461.10
	Excess/ Savings	-7.90	-9.53	-24.28	-10.93	-4.91	-57.55
ICAR (100%)	Receipt	13.92	5.44	10.73	14.92	21.26	66.27
	Expenditure	21.95	16.18	22.45	19.39	19.82	99.79
	Excess/ Savings	-8.03	-10.74	-11.72	-4.47	1.44	-33.52
ICAR (75%)	Receipt	9.47	11.14	9.36	13.40	16.53	59.90
	Expenditure	16.26	17.73	18.23	19.48	16.72	88.42
	Excess/ Savings	-6.79	-6.59	-8.88	-6.08	-0.19	-28.53
External Agencies	Receipt	36.72	17.20	15.82	18.54	12.30	100.58
	Expenditure	27.18	20.94	13.32	11.11	12.44	84.99
	Excess/ Savings	9.54	-3.74	2.50	7.43	-0.14	15.59

Audit

noticed the following weaknesses in the financial management of the University.

2.5.5.1 Deficiencies in the UFAST³⁹ accounting software

The University prepares its annual accounts and submits the same to the Government as per Section 47 of the Act and Statute No.815/79. The annual accounts are prepared through the UFAST software developed internally. The UFAST generates parallel bank statements and reconciles the office cash balance with it instead of the statement generated by bank. The UFAST generated bank balances were found to be different from the actual bank balances. Generation of parallel bank statements through UFAST software and the reconciliation of the book balance with the same is irregular. Audit observed that the UFAST generated bank balances shown in the annual accounts were often modified after their submission as the software allowed adjustments even after the closing of accounts.

Audit test checked the bank balances exhibited in the accounts with those generated by UFAST on 19 December 2019 and found that the same did not match with the statements generated for the finalisation of accounts. For instance, the closing balance of ₹131.75 crore for the 2016-17 was corrected as ₹144.10 crore after the submission of the annual accounts. Consequently, the opening balance of 2017-18 showed an excess

³⁹ University Functional Accountability System.

balance of ₹12.35 crore. Option to enable modifications/adjustments in the items contained in the accounts after their closure and submission to Government is indicative of major deficiency in the Software. Audit also noticed that the accounting software was adopted without certification of its reliability and controls by an external agency. The adoption and use of software without ensuring their security and reliability can lead to malpractices and frauds through manipulation of figures.

The Government in its reply (October 2020) accepted the audit observation and stated that corrective action was taken to ensure that there was no mismatch between UFAST and bank statements. It was, however, silent about the security and reliability of the software.

2.5.5.2 Non-preparation of Balance sheet

The original Kerala Agricultural University Act, 1971 required the University to submit its balance sheet along with the Annual Accounts to the Government. Statute No. 815/79 framed under this Act prescribed responsibility of the preparation of balance sheet by the Comptroller. The non-preparation of the balance sheet was commented in the Report of the C&AG for the year ended 31 March 1998. Meanwhile, the Act was amended in 2001 removing the clause requiring the submission of balance sheet along with annual accounts to the Government.

The Committee on Public Accounts (PAC) in its 57th report, based on the aforementioned C&AG Report presented to the legislature on the 17th of March 2008 recommended double entry system in accounting and the valuation of assets. Further, Statute prescribing the duties of the Comptroller to prepare balance sheet is still in force. Moreover, prudent accounting practice warrants the preparation of balance sheet in double entry accounting system.

In the reply furnished (October 2020) the Government stated that comprehensive

balance sheet was not being made but effort was on to make the balance sheet inclusive of all assets and liabilities of the University. The reply is not tenable as it does not justify the delay in preparation of balance sheet, which is stipulated in the Statutes notified in 1979 and also recommended by the PAC in 2008.

2.5.5.3 Inadequacy of non-plan funds released by Government leading to diversion of money from the PF contributions of employees

According to the Act, every year the Government shall make non-lapsable lump-sum grants to University not less than the estimated net expenditure of pay and allowances of the staff, contingencies, supplies and services of the University and also to meet such additional items of expenditure recurring and non-recurring as the Government may deem necessary for the proper functioning of the University.

Audit noticed that, the non-plan grants released by the Government to the University were less than the demand and actual expenditure of the University from the year 2000-01. Audit analysed the grant released and non-plan expenditure during the period 2014-15 to 2019-20, and the details are as follows:

Table-2.10: Details of grants

(₹ in crore)

Financial year	Grant requested	Grant received	Non-plan expenditure	Shortage
2014-15	269.48	208.82	246.72	37.90
2015-16	328.53	250.53	260.02	9.49
2016-17	413.59	281.91	306.20	24.29
2017-18	405.24	324.20	419.38	95.18
2018-19	463.50	338.10	343.40	5.30
Total	1,880.34	1,403.56	1,575.72	172.16

Audit noticed that the University met the deficiency in the non-plan grant by diverting amounts from the General Provident Fund (GPF) contributions of the employees, which also depleted the balance in their GPF accounts to the extent of ₹96.61 crores. As a result, the University has not been able (February 2020) to transfer the provident fund

of the employees who opted for Kerala Veterinary and Animal Sciences University (KVASU) and Kerala University of Fisheries and Ocean Studies (KUFOS) on trifurcation (2011) of the erstwhile Kerala Agricultural University. The amount due to KVASU was ₹33.31 crore while the dues to KUFOS has not been ascertained.

The Government in its reply (October 2020) accepted that the inadequacy of non-plan fund released by the Government had caused a deficit of nearly 100 crore in the GPF accounts and that 60 per cent of the deficit in GPF subscription amount of the employees had been made good by now. It was also said that GPF closure amounts were being disbursed to employees at the time of their retirement.

2.5.6 Internal Controls

The internal controls of an entity to safeguard its assets, promote accountability and efficiency are generally elaborated in its Accounts manual, Stores and Purchase manual, policy documents etc. Audit noticed that the University did not frame any such manual; and that the duties and powers of various authorities from which the internal controls of the University are derived were not separately documented or declared by Statutes.

Audit noticed the following weaknesses in the internal control of the University.

2.5.6.1 Inadequacies in the functioning of internal audit system

In order to strengthen the existing internal audit system and to bring uniformity in audit, Government of Kerala issued (19 December 2003 and 10 June 2005) guidelines on internal audit to all heads of departments. Accordingly, the University formed three internal audit circles (South, Central and North) for conducting internal audit.

Audit observed that the University has not framed its own internal audit manual so far. Further, even though the funds received at the University headquarters are distributed to the various stations coming under the three audit circles, the internal audits were not

evenly covered. For example, during the period from 2013-14 to 2017-18, funds were transferred to 65 stations coming under the three circles; but the audit programmes of the period were restricted to South and North Regions only covering 31 centres. More than 52 per cent of the stations were outside audit purview for several years. The University headquarters did not have a record of the internal audit programmes conducted.

The above lapses indicate the inadequacy of the existing Internal Audit system of the University and points to the need to improve governance.

In its reply (October 2020), the Government has accepted the audit observations and stated that earnest effort was being taken to frame an Internal Audit Manual of the University and to strengthen the Internal Audit System so as to improve governance.

2.5.6.2 Non-maintenance of Asset Register

Statute No.815/79 mandates the Director of Physical Plant to maintain an Assets Register containing the details of its plants and buildings. Audit noticed that such a register was not being maintained in the University. As a result, the University did not have proper control over its immovable assets.

The Government replied (October 2020) that necessary steps were being taken to maintain the Asset Register.

2.5.6.3 Irregular Operation of revolving funds

Revolving funds are maintained to meet the day to day expenditure on revenue generating activities like production and sale of seeds/seedlings, vegetables, other agricultural produces etc. The Act permits the University to have such other funds as may be prescribed by Statutes.

Audit noticed that the University operated 77 revolving funds and had a balance of ₹20.94 crore as of March 2019. But none of them had any legal back up as they were

not prescribed by Statutes as required under the Act.

The Government in its reply (October 2020) stated that the audit observation regarding lack of legal backing was taken note of and that necessary steps would be taken to achieve the objective.

2.5.6.4 Lack of responsiveness to PAC recommendations.

The Committee on Public Accounts (PAC) in its 57th report presented to the Legislature on the 17 March 2008 made the following recommendations on the basis of the report of the Comptroller & Auditor General of India for the year ended 31 March 1998.

- To adopt Double Entry System in accounting and Valuation of Assets as mentioned in paragraph 2.5.5.2 (Recommendation No.1.9).
- To undertake a work study on the faculty and redeployment of idling/ underutilised faculty (Recommendation No.1.13).

Audit noticed that the University has not implemented the recommendations so far. Further, the University had assured the PAC that a register containing the details of the extent of land was being maintained and was updated. Audit noticed that this was contrary to the facts.

The Government replied (October 2020) that necessary steps were being taken to adopt the double entry system in the accounting software of UFAST and to undertake a work study on the faculty and redeployment of idling and underutilised faculty.

2.6 Conclusion

The governance framework of the University was weakened by non-updation of Statutes, Ordinance and Regulations. It was further impacted by non-appointment of Officers of the University. In Academic activities, most of the programme offered by it are in demand and are fully subscribed. However, the University failed to comply with

the provisions of UGC regulations governing it in recruitment of faculty members and award of Ph.D. degree. As a result, faculty members awarded with its Ph.D. degrees were not eligible for advance increments as per Government norms. It also failed to comply with ICAR recommendations on establishment of new college at Ambalavayal. In research activities, the number and quality of research papers published in scientific journals per faculty were below benchmark as more than a third of the faculty did not publish research papers. The rice varieties released by the University occupy more than 80 per cent of the cropped area of the State in the case of rice, which is the staple food crop of the State. However, the popularisation of new varieties released by the University was hindered due to non-notification under the Seeds Act. The technologies developed and varieties released by the University are not protected by patents and by registration under the PPV&FR Act respectively. The University has obtained and facilitated Geographical Indication for various agricultural products of the State, however it lacks expertise to determine infringements to Geographical Indications owned by it. The internal controls and financial management of the University needs strengthening.

2.7 Recommendations

The Audit recommends that :

- ◆ Immediate steps may be taken to frame/update its Statutes, Ordinances and Regulations to ensure that the appointments of Officers of the University are done regularly and in compliance with the provisions of the Act, UGC Regulations and ICAR guidelines.
- ◆ Revamp its existing recruitment policy so as to attract high calibre faculties capable of strengthening its research output.

- ◆ Evolve a mechanism to monitor and update its compliance to various UGC regulations and ICAR Guidelines on a regular basis.
- ◆ Evolve a system for notification of newly developed and released varieties to be notified under the Seeds Act, 1966.
- ◆ Adopt appropriately the ICAR guidelines relating to Intellectual Property Management and Internal Evaluation of research papers.
- ◆ Develop own resources to improve its financial position and strengthen internal audit.
- ◆ University may put in place a suitable mechanism to inventorise and monitor the assets available in all its constituent colleges and research units.

[Audit Paragraph 2.5.4 to 2.7 contained in the Report of Comptroller & Auditor General of India for the year ended 31 March 2019 (Economic sector)]

[Notes received from the Government on the above audit paragraphs are included as Appendix-II]

Excerpts from the discussion of Committee with officials concerned

45) The Director of Research (in-charge), KAU informed that the matter related to extension of education had already been discussed.

46) During the discussion regarding the deficiencies in the UFAST (University Functional Accountability System) accounting software, the Comptroller, KAU informed the Committee that the IT Department of KAU had developed the UFAST software. He stated that the deficiencies identified during the implementation phase had been completely resolved, and the UFAST software and bank statements were now up to date. The Committee accepted the reply furnished by the Department.

47) During the discussion on the audit observation regarding the non-preparation of the balance sheet, the Comptroller Kerala Agriculture University explained that the

software had been updated to reflect financial assets and liabilities properly. He supplemented that the use of UFAST software has decreased following the implementation of G-SPARK. The double-entry system and balance sheet had also been incorporated as per the Accountant General's instructions. In response to a query about the internal audit wing, he mentioned that internal audits up to the year 2020 had already been completed. The Committee directed the Department to take measures to expedite the completion of internal audits.

48) In relation to the audit observation regarding the inadequacy of non-plan funds released by the Government leading to a diversion of money from employee Provident Fund contributions, the Comptroller, KAU reported a deficit of ₹172 crore as noted by the Accountant General, which has now been recouped through non-plan funds and internal receipts. The current deficit stands at approximately ₹12.71 crore, noting that funds granted to the University fell short of actual demands. He also mentioned that salaries and pensions for employees were being paid from non-plan funds, with pension arrears amounting to ₹158 crore and ₹46 crore under CVP.

49) When the Committee questioned the delay in formulating the Internal Audit Manual, the Comptroller, informed that a draft had already been prepared and submitted to the State Audit Department. As per the recommendation of the State Audit Department that the Agricultural University should maintain a separate Accountant Code, similar to Haryana Agricultural University, an expert Committee had been constituted.

50) Regarding the audit observation related to the non-maintenance of Asset Register, the Comptroller, KAU informed that necessary actions had been taken in that regard.

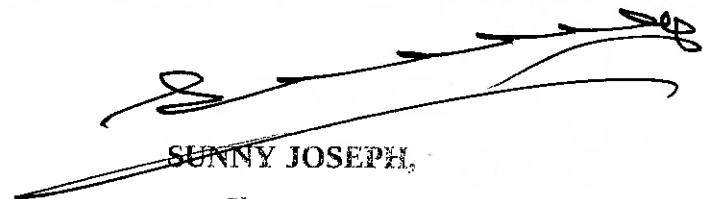
51) In response to the audit observation on the irregular operation of revolving funds, the Comptroller, KAU clarified that according to SRO No. 815/79, clause I (xii), there is no requirement for framing any special statute for the University to maintain the revolving fund. The Committee accepted the reply.

52) When the Committee enquired about the implementation of the recommendations of the 57th Report of the Committee on Public Accounts presented in the Legislature on 17th March 2008, the Comptroller, KAU informed that the recommendations of the Committee had already been implemented.

Conclusion/Recommendation

53) The Committee directs the Department to take earnest efforts to frame an Internal Audit Manual for the university for improving the quality of financial transactions and governance and also urges to take measures to expedite the process of completion of internal audit.

Thiruvananthapuram,
28th January, 2026.



SUNNY JOSEPH,

Chairperson,

Committee on Public Accounts.

APPENDIX I

SUMMARY OF MAIN CONCLUSION/RECOMMENDATION

Sl No	Para No	Deaprtment concerned	Conclusion/Recommendation
1	10	Tourism	The Committee expresses its extreme displeasure over the improper monitoring by the Department in connection with the projects implemented in Kayamkulam and Thalassery. The Committee urges that a more robust system of oversight be ensured to avert potential issues in future, and timely intervention should be made to rectify emerging discrepancies.
2	11	Agriculture Development and Farmers' Welfare	The Committee notices that the explanation given by the Department regarding the commencement of work related to the projects in kayamkulam and Thalassery without getting proper clearance and not taking any steps for obtaining the necessary clearance even after the completion of the work was not satisfactory. Therefore, the

			Committee directs the Department to seek explanation from the Officers responsible for the flaws and submit to the Committee urgently.
3	12	Agriculture Development and Farmers' Welfare	The Committee directs the Department to take earnest efforts to ensure that mandatory/ statutory clearance should be obtained before issuing Administrative/ Technical sanction in order to avoid flaws in future. The Committee also suggests that availability of land should be ensured before sanctioning any Projects.
4	14	Agriculture Development and Farmers' Welfare	The Committee expresses its dissatisfaction with the inordinate delays in university appointments and recommends that proper action should be taken by the Government to facilitate regular appointments.
5	53	Agriculture Development and Farmers' Welfare	The Committee directs the Department to take earnest efforts to frame an Internal Audit Manual for the university for improving the quality of financial transactions and

			governance and also urges to take measures to expedite the process of completion of internal audit.
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Notes furnished by the Dependence. 8/5/24

Appendix II

ACTION TAKEN REPORT ON THE REPORT FOR COMPTROLLER AND AUDITOR GENERAL OF INDIA ON ECONOMIC SECTION OR THE YEAR ENDED MARCH 2019

Para No.	Recommendations	Action Taken
	<p style="text-align: center;">Chapter II</p> <p style="text-align: center;">PERFORMANCE AUDIT</p> <p style="text-align: center;">AGRICULTURE DEVELOPMENT AND FARMER'S WELFARE DEPARTMENT</p> <p style="text-align: center;">FUNCTIONING OF THE KERALA AGRICULTURAL UNIVERSITY</p>	
2.5	<p>AUDIT FINDINGS</p> <p>The audit findings as against the audit objectives are grouped under six categories namely; Governance, Academic Activities, Research, Extension education, Financial Management and Internal Controls as given below.</p>	
2.5.1	<p>Governance</p> <p>'Governance' in the University denotes the framework within and by which the University exercises powers and discharges its functions. Governance plays an important role in the overall performance of the University as deficiencies in Governance have a cascading effect on the other functions of the University. The Kerala Agricultural University Act, 1971 (the Act), the Statutes and the ordinances and Regulation framed under the Act provide a self-contained framework for the internal governance of the University. Further, the Act has designated various 'authorities' and 'officers' of the University to exercise powers.</p> <p>The meetings of the General Council and the Executive Committee were held as stipulated. The Registrar being the ex-officio secretary to the General Council, the Executive Committee and the Academic Council is bound to place before each such authority all such information (UGC regulations, ICAR Guidelines, applicable Government Orders etc.)</p>	

as may be necessary for the transaction of its business and decision making. The Officers of the University, including the Registrar are not appointed as per the statutory provisions as detailed in para 2.5.1.2. Due to such temporary arrangements, the Authorities of the University could not properly exercise the powers vested in them to make/amend Statutes, Ordinances, and Regulations as prescribed in the Act. This resulted in taking decisions which were not in compliance with the regulatory frameworks including the UGC Regulations and ICAR guidelines etc., as discussed in this report.

Audit examined the governance framework of the University consisting of the Act, Statutes, Ordinances and Regulations and the compliance thereof by the authorities and officers of the University. The audit findings in respect of Governance are discussed below.

2.5.1.1

Deficiencies in Governance Framework

Lapses in the following areas indicated that the system of governance in the University was not effective.

- **Non-framing of Statutes** – Section 7(11) of the Act empowers the University to create posts for teaching, research and extension education and to appoint persons to such posts. Section 42(3) of the Act stipulates that the procedure for selection of officers, teachers and other employees of the University shall unless otherwise provided for in this Act, be such as may be prescribed in the Statutes. Audit observed that the General Council of the University created several posts including senior level posts such as Dean of Forestry (head of the College of Forestry), Controller of Examinations, Associate Deans (head of various colleges), Associate Directors (heads of various research stations) but did not frame and pass Statutes specifying the procedure of selection to these posts (Appendix 2.4). This was the case even in respect of the post of the Director of Students Welfare, a post specified in the Act since the inception of the University. Consequently, the University could not carry

Steps are being taken for framing statutes for the post mentioned in the audit objection.

out regular recruitment to these posts and these posts were operated by giving additional charge to senior faculty members, which affected their academic and administrative performance. The University attributed the under performance in respect of its research papers published in scientific journals to multiple responsibilities and excess work pressure, as discussed in paragraph 2.5.3.1. The Government in its reply (October 2020) stated that Statutes for these posts were being framed and the process would be expedited.

- **Non amendment of Ordinance**

Section 7(14) of the Act empowers the University to fix, demand and receive such fees and other charges as may be prescribed. Section 50(a) of the Act stipulates that the Executive Committee shall have power to make Ordinances regarding levy of fees in colleges and other institutions by the University. Audit observed that the University last amended the relevant Ordinance in September 2002, but revised the fees periodically without amending the Ordinance. As a result the fees levied now is much higher than what is prescribed in the Ordinance, as shown in the following table:

Name of the Programme	Fees Fixed as per amended ordinance, 2002 (in Rs)		Fees collected in 2019 (in Rs.)	
	First Semester	Second semester onwards	First Semester	Second semester onwards
B.Sc (C&E)	1800	1285	11980	9580
All Other UG Programme	2200	1685	11980	9580
B.Tech (Food)	-	-	36250	30000

The Executive Committee in its 595th meeting held on 05.10.2021 amended the ordinances regarding levy of fees of all courses offered by KAU. The same has been placed before the General Council in its 142nd meeting held on 04.12.2021. A copy of the ordinance has been submitted before the Hon'ble Chancellor too. Steps are being taken to publish it in the gazette.

Engg.)				
Master's Degree Programme	4250	3025	16710	13510
MBA (Agri Business Management)	-	-	36500	29000
B.Sc-M.Sc (Integrated)	-	-	4400	40000
Doctorate Degree Programme	5525	3925	17500	13510

Levy of fees at rates higher than those notified through Ordinances was irregular and its legality is questionable. The Government in its reply (October 2020) stated that hence forth the University shall ensure that the Ordinances are amended promptly by the Executive Committee for levy of fees in colleges/other institutions

● **Non-publishing of Regulations in the Gazette** - Academic Council is the Body which frames, amends and repeals Regulations regarding academic matters subject to the provisions of the Act, Statutes and Ordinances. Section 55 of the Act stipulates that all Statutes, Ordinances and Regulations made under the Act shall be published in the Gazette. The Statute No. 839/74 require that a copy of the Ordinances and Regulations be forwarded to the Chancellor besides placing them before the General Council as soon as they are made. Audit observed that the University has framed five Academic

The University will ensure that all ordinances and academic regulations passed or amended hereafter by the Executive Committee and Academic Council respectively are placed before the General Council in its next meeting for approval. It will be ensured that all ordinances and regulations are submitted before the Honble Chancellor and are published in the gazette. The Executive Committee in its 595th meeting held on 05.10.2021 amended the ordinance

regarding levy of fees of all courses offered by KAU. The same has been placed before the General Council in its 142nd meeting held on 04.12.2021. A copy of the ordinance has been submitted before the Hon'ble Chancellor too. Steps are being taken to publish it in the gazette.

Regulations and published it in its hand book (which is an internal document of the University, Unlike the Gazette), but none of these were published in the Gazette as mandated in the Act. No copies of these Regulations were submitted to the Chancellor. Non-submission of the Regulations to the Chancellor who is the Head of the University and the non-publication of Regulations in the Gazette as mandated by the Act made the validity of the Regulations questionable. The Government in its reply (October 2020) stated that the University will hence forth ensure that all Ordinances and Academic Regulations are placed before the General Council for its approval and it will be published in the Gazette and it will be submitted to the Chancellor

2.5.1.2

Officers of the University

The Vice-Chancellor is appointed by the Chancellor and the Comptroller by the Government. Appointment to the posts of other officers of the University is done by Executive Committee. Audit examined the procedure followed by the University in appointing the 'Officers of the University'. The Statutes governing appointments of 'Officers of the University' (except VC and comptroller) stipulate that their appointment shall be done by inviting applications through advertisement except for the Registrar and Director of Physical Plant who can also be appointed on deputation. Appointments to these posts are for a fixed tenure. Audit noticed that the University did not appoint these officers in the prescribed manner during the past several years as shown in the table below. Instead, it nominated teaching staff to these posts (except librarian) with full additional charge..

From 2008 onwards, the Teachers of the University are being placed in full additional charge of the posts of the Registrar. But now, the matter of appointment of Registrar as per KAU statute is under the consideration of the EC, the appointing authority.

Based on the decision of 536th EC meeting held on 09.10.2015, a notification was issued by the University inviting the applications for Dean (Agriculture), Dean (Agricultural Engineering), Director of Extension and Director of Research vide GA/M2/2060/2013 dated 11.05.2016.

As per the decision of 544th EC meeting held on 23.06.2016, the above notification was cancelled and issued a re-notification which was based on guidelines of the existing statute.

As there is no specific guidelines for appointment of Deans/Directors in 2006 UGC Regulations, legal advice was sought for issuing a re-notification for

Table 2.2 Procedure prescribed for appointment of Officers of the University

Sl.N o.	Designation	Date of Last regular appointment	Procedure Prescribed for appointment
1	Registrar	22/05/2003	Direct recruitment or deputation
2	Director of Physical Plant	22/06/2004	Direct recruitment or deputation
3	Librarian	16/05/1995	Direct recruitment
4	Dean (Faculty of Agriculture)	03/07/2010	Direct recruitment
5	Dean (Faculty of Agriculture Engineering)	04/07/2010	Direct recruitment
6	Dean (Faculty of Forestry)	Statute not made	Not prescribed
7	Director Research	03/07/2010	Direct recruitment
8	Director Extension	03/07/2010	Direct recruitment
9	Director of Students' Welfare	Statute not made	Not prescribed

the Deans/Directors as some of the applicants retired from service.

Now the matter for re-notifying the post of Dean (Agriculture), Dean (Agricultural Engineering), Director of Research and Director of Extension is under the consideration of Executive Committee.

No appointment as stipulated under the Statutes has been made by direct recruitment/deputation as required for the posts, after the last regular appointment as shown in the table. Audit noticed that these in-charge posting of short duration compromising the efficiency of internal governance had become a regular practice in the University. Statute No. 266/72 empowers the Vice Chancellor to make provisional appointment only under emergent situations.

The Act and the relevant Statute stipulate that the Registrar shall be a whole-time officer of the University and also the ex-officio Secretary to the General Council, Executive Committee and Academic Council. Audit noticed that the University did not comply with the statutory provisions while appointing Registrar. During the period from 25 January 2007 to 30 March 2019 (12 years and two months) 12 officials (Excluding the present incumbent) held charge of the post of Registrar with periods of incumbency ranging from one month to three years. These stopgap arrangements did not provide many of the incumbents the time required to familiarise themselves with the rules and regulations governing the administrative system of the University before they retired; thus affecting their capacity to discharge duties efficiently.

The Government stated (October 2020) that the University will take necessary steps to appoint a Registrar as per the statutory provisions by direct recruitment or by deputation. It was also stated that Statutes were being framed wherever required and that action would be taken for regular appointment against posts of all officers.

The failure of the University to carry out regular appointment to these posts, especially that of the Registrar contributed to the non-compliance to the regulatory norms as discussed in the succeeding paragraphs.

2.5.2 Academic Activities

2.5.2.1

Enrollment of Students

The University offers five Under Graduate Programmes of four years' duration in as many disciplines. The syllabus followed by the University is based on the curriculum proposed by ICAR. As against the intake capacity, the actual enrollment to these programmes during the five year period from 2014 to 2018 were as follows:

Intake capacity and the number of students admitted to programmes

The number of students admitted was above the intake capacity in some programmes as additional seats were allotted to various categories such as diploma holders in Agricultural Sciences, Children of personnel retired from paramilitary services in the State and holders of Vocational Higher Secondary Education (Agriculture).

The university increase the intake capacity of its B.Sc. (Hons.) Agriculture Programme due to its increased demand, from 208 to 420 in the year 2018 by increasing the capacity of existing Colleges and opening a new College. Besides it offers seven Masters Programme in 32 disciplines with a total intake capacity of 320 and two B.Sc - M.Sc. Integrated programmes with intake capacity of 20 each. The University also offers six doctoral programmes in 26 disciplines with total intake capacity of 113 as of 2019. The total student strength as of March 2019 is 2,412.

University Grants Commission (UGC) was established under the UGC Act, 1956 for determining the standard of Universities, promotion and co-ordination of University education. The Act empowers UGC to frame regulations for the purpose of performing its functions like defining the qualifications and standard that should ordinarily be required of any person to be appointed in the Universities. Universities are governed by these regulations which are subordinate legislation and have binding

The number of seats reserved for various category such as Diploma holders in Agricultural Science and holders of vocational higher secondary education (Agriculture) etc. have been included in the total intake capacity and allotment to the seats are done through KEAM allotment by Commissioner of Entrance Examination.

effect.

The Indian Council of Agricultural Research (ICAR), an autonomous organisation under the Department of Agricultural Research and Education (DARE), Ministry of Agriculture and Farmers Welfare, Government of India is the apex body for co-ordinating, guiding and managing research and education in agriculture including horticulture, fisheries and animal sciences in the entire country. ICAR has recommended the minimum standards in respect of infrastructure, equipment, staff strength, curricula etc., to be maintained by the Agricultural Universities. The audit findings on the University's academic activities are discussed below:

2.5.2.2

Accreditation

Accreditation is a process of quality control in higher education, carried out by an authorised agency through scientific evaluation or assessment, whereby an institution of higher education or a programme conducted by that institution is recognised as conforming to the parameters of academic quality. Quality assurance, including accreditation processes, is one of the universal techniques to enhance global competitiveness.

According to the UGC (Mandatory Assessment and Accreditation of Higher Educational Institutions), Regulations, 2012 (The UGC Accreditation Regulation, 2012) accreditation is compulsory for all universities. Each accredited higher educational institutions is to apply for re-accreditation six months before the expiry of the existing accreditation in accordance with the norms and procedures prescribed by the relevant Accreditation Agency. The validity of accreditation is for five years.

Audit observed the following lapses/irregularities relating to the accreditation of the University:

The timelines prescribed in UGC (Mandatory Assessment and Accreditation of Higher Educational Institutions), Regulations 2012 will be strictly followed.

Delay in applying for renewal of Accreditation :

The National Agricultural Education Accreditation Board (NAEAB) of ICAR gave accreditation (2014) to the University and its constituent colleges which were valid up to 10 March 2019. ICAR in its letter dated 09 October 2018 reminded the University to apply for renewal of accreditation without delay and also intimated that accreditation was mandatory for the release of development grant from it. Despite this, the University did not apply for renewal of accreditation within the timelines prescribed in the UGC accreditation Regulation, 2012, but applied (19 February 2019) for renewal of accreditation just 19 days prior to the expiry of existing accreditation. The NAEAB renewed the accreditation only in September 2020. As a result, ICAR did not release development grant to the University for the year 2019-20 even though the University had requested Rs. 91.47 crore.

In its reply (October 2020), the Government contended that the NAEAB had not stipulated any timeline for renewal of accreditation and that the delay in getting accreditation was due to non-compliance of timelines by the NAEAB. Regarding non-release of development grants, it was stated that normally the ICAR development grants were limited to Rs. 4 crore to 5 crore only and that the University had requested for additional grant in the ensuing allocation.

The reply of the Government is not tenable as the UGC Accreditation Regulations 2012 is applicable to all Universities including Kerala Agricultural University and it should have followed the timeline prescribed.

Inaccuracies in the application for renewal of accreditation :

The process of accreditation starts with the submission of a Letter of Intent (LOI) by the University along with the proforma for the Institutional Eligibility for Accreditation (IEA) to the NAEAB Secretariat. The proforma for IEA includes an action taken report on the last

recommendation/observation of NAEAB, the status of implementation of ICAR guidelines including the Fifth Deans' Committee recommendations, conduct of academic audit, publishing of Annual Academic Calendar, etc. In addition to these, a statement on the compliance of the University Grants Commission (Minimum Qualifications for Appointment of Teachers and other Academic Staff in Universities and Colleges and other Measures for the Maintenance of Standards in Higher Education) Regulations, 2010 (UGC Regulations, 2010) and the University Grants Commission (Minimum Standards and Procedures for the award of M.Phil/Ph.D degree) Regulations, 2009 (UGC Ph.D. Regulations, 2009) should also be submitted. If the IEA is found satisfactory, the NAEAB Secretariat shall send a letter in this regard to the University/Institution following which the University is required to submit the accreditation fees along with Self Study Reports (SSR). A Peer Review Team (PRT) is formed by NAEAB after scrutiny of the SSR. The peer Review team visits the University and submits its report to the NAEAB. The NAEAB takes a decision on accreditation based on the report. If the IEA is not satisfactory, it shall be rejected along with the action taken report and the university/institution shall re-submit the document after due modification/ justification.

As NAEAB ascertains eligibility of an institutions for accreditation solely based on the information provided by the institution in its LOI and IEA, it is important that the information so provided by the institution should be accurate and factual.

The University submitted the LOI and IEA under the signature and seal of the Registrar who specifically certified to the accuracy of the information provided therein and subject to the condition that if the information furnished was false or misleading, the accreditation granted was liable to be cancelled. Audit Scrutiny of the IEA/report submitted by the University to NAEAB revealed factual inaccuracies as detailed below:

Statement of Compliance (Central and State Universities): The University certified that it was governed the UGC Regulations, 2010 and the UGC Ph.D. Regulations, 2009 and that it had complied with all its provisions. Audit Scrutiny revealed that the University did not comply with the following UGC regulations:

- Regulation No. 1.1.1 of UGC regulations, 2010 prescribing the qualification for appointment of teachers in the faculty of Agriculture and Veterinary Sciences as per ICAR norms, as discussed in paragraph 2.5.2.3.
- Regulation No. 6.0.11 of UGC Regulations, 2010 prescribing establishment of an Internal Quality Assurance Cell (IQAC) in all Universities/Colleges as per the UGC/National Assessment Accreditation Council (NAAC) guidelines. The functions of IQAC inter-alia include development and application of quality benchmarks, dissemination of information of various quality parameters, documentation of various programmes/activities of the University leading to quality improvement, development of quality culture in university etc. But the University did not establish IQAC as per UGC/NAAC guidelines. As a result, a proper system, to document research data in terms of research papers published, did not exist in the University, as discussed in the paragraph 2.5.3.1. The role of IQAC in the University was limited to the documentation and record keeping of career advancement scheme of the teaching staff.
- Regulation No. 13.1 of UGC Regulations, 2010 prescribing the procedure for appointing teachers on contract, as discussed in paragraph 2.5.2.3.
- UGC Ph.D Regulations 2009 superseded by UGC Ph.D Regulations 2016 prescribing the procedure for award of Ph.D degree, as discussed in paragraph 2.5.2.9

Regulation No. 1.1.1 of UGC Regulations, 2010 prescribing the qualification for appointment of teachers in the faculty of Agriculture and as per ICAR norms, as discussed in paragraph 2.2.2.3: The notification dated 03/03/2016 issued by Kerala Agricultural University for the post of Assistant Professor was not a dilution of the essential qualification prescribed in the UGC Regulations. Infact NET has been made an essential qualification for maintaining higher standards in Teaching. Further, the subsequent notification issued (February 2020) by the University, is in line with relevant UGC regulations.

Regulation No. 6.0.11 of UGC regulations, 2010: As per Clause 6.0.11 of UGC Regulations 2010, the Internal Quality Assurance Cell (IQAC) shall be established in all Universities/Colleges as per the UGC/National Assessment Accreditation Council (NAAC) guidelines with the Vice Chancellor, as Chairperson (in case of Universities), and Principal as Chairperson (in case of colleges). The IQAC shall act as the documentation and record keeping Cell for the institution including assistance in the development of the API criteria based PBAS proforma using the indicative template separately developed by UGC. The IQAC may also introduce, wherever feasible, the student feedback system as per the NAAC guidelines on institutional parameters without incorporating the component of students assessment of individual teachers in the PBAS.

On the basis of the above, an Internal Quality Assurance Cell (IQAC) was constituted in KAU vide University Orders No. GA/K2/21144/2010(ii) dated 29/04/2014 and GA/K1/34376/2016 dated 09/03/2017 under the Chairmanship of Hon'ble Vice Chancellor of KAU.

- Action taken report on the last recommendation/observation of NAEAB:
NAEAB had recommended that recruitment to the Officers' position should be taken up periodically. In the proforma for IEA the University stated that it conducted recruitments to be Officers' positions regularly, as and when the positions fell vacant. Audit observed that the University did not conduct regular recruitment of Officers, as discussed in paragraph 2.5.1.2.
- Fifth Deans' Committee recommendations: The University stated that it implemented in full, the recommendations of the Fifth Deans' Committee including the recommendations on minimum requirements for establishment of new college in agriculture and allied disciplines. Audit noticed that the University did not comply with the recommendations on establishment of new colleges in respect of the College of Agriculture, Ambalavayal, as discussed in paragraph 2.5.2.5.

- Conduct of Academic audit: Audit noticed that the IQAC of the University did not conduct academic audit as prescribed in NAAC Guidelines. However, in the proforma for IEA the University stated that it had conducted academic audit in the last two years.
Thus, the University undermined the accreditation process by not disclosing the actual position in the IEA and the Compliance Statement

Fifth Deans' Committee Recommendations:

Action has been taken by the University to improve the physical infrastructure of CoA, Ambalavayal using state plan funds. The University has also subsequently appointed new Assistant Professors in this college. KAU also submitted a detailed proposal (regarding staff and physical infrastructure) to the Government of Kerala for funding to further develop CoA, Ambalavayal based on the "Minimum standards" prescribed by ICAR.

Conduct of Academic Audit:

The syllabus of the various UG, PG/PhD course being offered at KAU which are proposed by ICAR are first reviewed at concerned department level and respective Board of Studies of different faculties and approved by the Academic Council. The

submitted for renewal of accreditation. It is also pertinent to note that while granting accreditation (September 2020), the NAEAB also awarded to the University with 'B' grade (out of possible four grades of A+, A, B and C) corresponding to a score of 2.90, which placed it among the category III Universities. According to the University Grants Commission (Categorisation of Universities (only) for Grant of Graded Autonomy) Regulations, 2018, Category III Universities are eligible for the least autonomy. Further, accreditation was not granted to 14 of its programme and two colleges (Appendix 2.5).

The Government in its reply (October 2020) claimed that, the Peer Review Team of ICAR had visited all the campuses and had physically verified the facts stated in the IFA and LOI.

The reply of the Government is not tenable, as University has underplayed its lapses by merely referring to the Peer Review Team exercise. Further, the documents furnished by the University did not show any indication that the Peer Review Team had verified the process followed for regular and contract recruitment of teachers as pointed out by audit, compliance to UGC Ph.D. Regulation 2009 and adherence to the Fifth Deans' Committee recommendation in respect of new college of Agriculture at Ambalavayal.

Academic Council meet once in every six months and review the various academic activities of the University and provides a new sense of purpose and direction. Academic activities at the college level is regularly monitored by respective Deans of Faculties and Deans of constituent colleges, while at Department level, the monitoring is done by respective Head of Department. At the end of each semester, HODs of teaching departments regularly sources anonymous feed back from students regarding the offered course by department faculty. Parameters for this academic auditing of teachers involves assessing the teacher's punctuality in delivering classes, subject knowledge and teaching competency, coverage of the syllabus, involvement in student's learning activities, ability to clarify doubts, equitability and inclusiveness etc. All Constituent colleges also conduct regular academic evaluation for their faculty and this assessment exercise includes gauging the academic workloads of faculty like number of courses (UG, PG, PhD) handled per semester, student advisorship activities, students research guidance, peer recognitions obtained by students, preparation of course/learning materials like manuals, digital media, MOOCs etc, publication of popular and peer reviewed papers, projects secured etc. The question papers for the University examination are prepared by external question paper setters of repute and the same is valued with the help of external examiners. Hence KAU has been consistently following a

2.5.2.3 Manpower Management

The sanctioned employee strength of the University consisting of faculty and other staff is 2,457. The manning levels as of March 2019 against the sanctioned strength is as shown in the following table:

staff strength position			
	Sanctioned Strength	In-position	Vacancy percentage
Faculty	766	342	55
Other Staff	1,691	1,219	28
Total	2,457	1,561	

The recruitment of other staff is carried out by the Kerala Public Service Commission (KPSC). The recruitment of faculty members is conducted by the University directly. The University Manual 2001 (Chapter VII para 4) recommends the recruitment be a continuous process to fill up vacant positions with fixed schedules in order to avoid stress on regular employees. A total of 166 teachers retired during the audit period 2014-15 to 2018-19. Audit observed that the University initiated recruitment process in 2016 after eight years of the previous recruitment in 2008. The recruitment process initiated in 2016 as finalised only in 2019. As a result, the strength of the regular faculty was reduced to below 50 per cent in its college, research stations and KVKs as shown in the following table. The main reason for arising of these vacancies was the failure of University to carry out regular recruitment against vacancies arising due to normal retirement.

scientific and systematic method for academic auditing of its various academic processes.

The University notification dated 03.03.2016 was not a dilution of the essential qualification prescribed in the UGC regulations. In fact NET has been made an essential qualification for maintaining higher standards in Teaching. As per KAU notification No. GA/K1/34376/2012 dated 03.03.2016, University invited application for the direct recruitment of Assistant Professors in various disciplines under KAU. After due selection process, the rank lists for appointment of Assistant Professors were prepared and published on 19.02.2019. The validity of the rank list extended by 6 months with effect from 18.02.2021. 277 candidates joined KAU service from various rank lists.

The selection process for the appointment of Assistant Professors in Agricultural Engineering and CCBM are going on.

Faculty staff strength position

	Sanctioned Strength	In-position (regular faculty)	Vacancy	Vacancy Percentage
Colleges	415	176	239	58
Research Stations including AICRP	302	144	158	52
KVKs	49	22	27	55
Total	766	342	424	55

The University filled, on an average, 47 per cent of the sanctioned posts of teachers in its colleges through postings made on contract/daily wage basis during the years 2014-19. Audit observed the following lapses in the recruitment process initiated in the year 2016 and in the appointment of contract teachers:

- The UGC Regulations, 2010 issued on 30 June 2010 and notified on 18 September 2010 prescribing the minimum standards for appointment of teachers and other measures for maintenance of standards in higher education stipulates that in respect of faculty of agriculture and veterinary science, the norms/regulations of ICAR shall apply. Accordingly in December 2011, ICAR modified the norms for recruitment of Assistant Professor in respect of faculty of agriculture and veterinary science, according to which, NET along with one publication in National Academy of Agricultural Sciences (NAAS), New Delhi rated referred journal

was made compulsory for candidates having Masters Degree for being recruited to the post of Assistant professor and equivalent in the disciplines in which NET is conducted. The main objective of NAAS is to recognise and promote excellence of individual scientists in fields of agricultural sciences including crop husbandry, animal husbandry, fisheries, agro-forestry and interface between agriculture and agro-industry. NET could be waived off for candidates holding Ph.D degree, provided it was done with course work as prescribed by the UGC Regulations 2009 and the candidate had at least two full length publications having a NAAS rating of not less than four on the last date of submission of application. Those candidates with Ph.D degree without course work would not qualify for NET exemption. The modified norms had prospective effect from 01 January 2012. Universities which failed to implement NET essentiality as per the above provision were not be given development grants by ICAR.

Audit observed that the University diluted the above provision in the recruitment notification issued in March 2016 in which the essential qualification prescribed were Master's degree with NET. Ph.D was only a desirable qualification not eligible for NET exemption. This was contrary to the ICAR norm. The University thus failed to give due weightage to the research credentials of the candidates stipulated by ICAR. As the research product of the University in terms of the research papers published in scientific journals was below the benchmark, as discussed in paragraph 2.5.3.1, the University should have given emphasis to the research credentials of candidates as required by ICAR.

- According to UGC regulations 2010, (Regulation No. 13) the qualification and selection procedure for contract appointment of teachers was to be the same as those applicable to a regularly

appointed teacher. The selection committee for contract appointment to the post of Assistant Professor was to consist of eight members from the field of education. The presence of at least four members including two outside subject experts was required to complete the quorum.

Audit observed that, the selection committees for the recruitment of teachers on contract basis were not formed as per the UGC regulations. Thus the composition and quorum of the selection committees were not as prescribed. It consisted of only three members against a quorum of at least four and included members from non-academic background also, thus rendering the decision of the selection committee challengeable.

The Government in its reply (October 2020) contended that the notification for recruitment to the post of Assistant Professors issued in March 2016 was issued in accordance with the Statutes of the University and the relevant UGC norms. It was further stated that the notification also contained a clause at the end stating that "The mode of selection, applicable reservation, relaxation of age and all other matters relating to the appointment to the post shall be governed by the provisions contained in the University Statutes, UGC Regulations, 2010 and orders issued by the Government from time to time making the notification complaint to the UGC regulations."

The reply is not tenable as the University notification for recruitment of regular faculty was a dilution of the essential qualification prescribed in the UGC regulations and binding on the University. Further, the subsequent recruitment notification issued (February 2020) by the University, is in line with relevant UGC regulations.

Regarding the recruitment of teachers on contract basis, it was stated that the University will ensure that the selection procedure will be the same as those applicable to regularly appointed teacher as per UGC regulations.

In the application for accreditation (February 2019) submitted by the University it was however, claimed that the University had complied with all the provisions of the UGC regulations as discussed in paragraph 2.5.2.2. This indicates that the University as an institution and the Registrar of the University who submitted the application for accreditation in particular, was uninformed on the regulatory norms governing the University. This reflects poorly on the governance of the University.

2.5.2.4 Functioning of Libraries.

The University has a network of libraries, including a Central Library in the main campus, constituent colleges, RARS, research stations and KVKs. The Kerala Agricultural University Library and Information System (KAULIS) was established in 1995. The KAULIS consists of the Central Library, college libraries in constituent colleges and research stations. It has digitised repository of information on agriculture which includes Crop and Animal Production, Fisheries, Forestry, Nutrition and Rural Development. It facilitates digital access to most of the advanced sources of information like CABI e-Books (<https://www.cabi.org>), CAB Abstracts, KrishiPrabha, Indiastat.com etc. Which facilitates knowledge for students and faculty. Consortium for e-Resources in Agriculture (CeRA) provides access to full text of 3,951 journals from reputed publishers like Elsevier, Springer, Annual Review Inc., Wiley etc. Apart from that, users can request for articles to any of the libraries in the consortium through Document Delivery Service. India Agristat, 1,174 e-books and 17 e-book series published by Elsevier were also provided through CeRA.

Krishikosh is a digital repository of accumulated knowledge in agriculture and allied sciences which is maintained by ICAR. Full text of

thesis submitted to the University can be accessed through the Krishikosh. The University is an Institutional Member of DELNET (Developing Library Network) which provides access to more than 20 million bibliographic records of books, journals, articles, CDs etc. The Inter Library Loan (ILL) and Document Delivery Services (DDS) are one of the most popular service of DELNET. Indian Digital Ensemble of Agricultural Libraries (IDEAL) is a platform for sharing library holdings through Union Catalogue (AgriCat) or Agricultural University Libraries of Indian National Agricultural Research and Education System. (NARES). Bibliographic details of more than one lakh books available in College Libraries and Central Library is available through the IDEAL.

The average daily footfall of students and faculty visiting the library was 51 percent and 48 per cent in the years 2017 and 2018.

2.5.2.5

Establishment of a new college.

The report of the Fifth Deans' Committee released (July 2016) by ICAR recommended measures for improvement of the national agricultural education system and prescribed minimum standards for establishing new colleges of agriculture. These recommendations which were made mandatory by ICAR were linked to the accreditation of institutions and to the release of ICAR grants.

The University proposed (April 2018) to start the new college by upgrading the existing RARS at Ambalavayal subsuming its faculty and infrastructure facilities which was stated to be sufficient for the first two years. Government approved the proposal subject to the condition that no additional fund would be given and no new posts would be created. The College of Agriculture, Ambalavayal started to functioned (2018) by admitting one batch of 60 students from the academic year 2018-19 onwards.

Consistent action has been taken the University to improve the physical infrastructure of CoA, Ambalavayal using state plan funds. The University has also subsequently appointed new Assistant Professors in this College.

KAU also submitted a detailed proposal (regarding staff and physical infrastructure) to the Government of Kerala for funding to further develop CoA, Ambalavayal based on the "Minimum standards" prescribed by ICAR. In response, the Government of Kerala has requested the University to deliver detailed presentation in this regard before the Government authorities.

Audit observed that the faculty strength and the infrastructure facilities available RARS were far below requirements recommended by the Fifth Deans' Committee as evident from the following table.

Table 2.6 : Facilities required/available at College of Agriculture, Ambalavayal

Sl.N o.	Minimum Facilities required as per Fifth Deans' Committee recommendation	Facilities Available
1	Five Smart lecture halls	Two ordinary class room *(This was provided with the infrastructure diverted from the project 'Technology intervention and peoples participation for poverty alleviation in Wayanad district at Ambalavayal' as discussed in paragraph 2.5.3.4
2	31 teaching staff	15 teaching staff
3	Two hostels (separate for boys and girls each with 150 capacity)	No hoxel, (student accommodated in congested trainees' hostel, conference hall and staff quarters.)
4	12 full-fledged laboratories.	Five under-equipped laboratories (Appendix 2.6)

	<p>In the application for accreditation submitted (February 2019) by the University to NAEAB, the University gave an undertaking that it had implemented the recommendation of the Fifth Deans' Committee in full which was contrary to the facts as shown in Table 2.6.</p> <p>The Government in its reply (October 2020) stated that the University would earnestly take all necessary steps to ensure the minimum standards as recommended in the Fifth Deans' Committee Report, by the fifth year of the establishment of the College i.e., by 2023, when it becomes due for accreditation with the support of the Government.</p> <p>The reply is untenable because according to the NAEAB's guiding principle, accreditation is granted based on the performance and facilities existing in the colleges for last five years. The Hon'ble Supreme Court has also ruled in Appeal No. 31813 of 2018 against a special petition that it should also be ensured that the courses in the past met the minimum standards prescribed by ICAR. So, the University is bound to adhere to the minimum requirements prescribed by ICAR since the inception of College.</p>	
2.5.2.6	<p>Institution on academic programme</p> <p>The University instituted a five year academic programme of B.Sc-M.Sc (Integrated) Degree in Climate Change Adaptation' in its Academy for Climate Change Education and Research (ACCER) during the academic year 2010-11 with a sanctioned strength of 10 teaching staff and a yearly intake of 20 students. The programme, claimed to be the only one of its kind in Asia, and was commenced with expected career prospects including research in State/Central government departments related to agriculture, conservation and natural resource management, animal science, fisheries, forestry, water resources and environmental protection. As of March 2019, 72 students of four batches had passed</p>	<p>Process are a foot to publish the name, academic profile, status of the faculty and status of physical asset, amenities etc. in the official website of the University and respective college's sub websites through the Directorate of Information Systems. The updated details will also be notified in the prospectus from the ensuing academic year onwards.</p>

out from the Academy. Audit examination of the functioning of the Academy revealed the following;

- The University could not make regular appointment of teachers since the inception of the programme as it had not framed statutes for recruitment of regular teaching staff. As a result, classes were handled by teaching staff on contract and visiting staff from other institutions. This resulted in lack of continuity in the academic programme and was creating difficulties in the routine activities (Academic Officer/Hostel Warden/Accompanying students on study tour etc.) Further, the academy is not in a position to explore research funding opportunities due to lack of permanent teaching staff.
- This being a unique degree, the University could not convince potential employers of equivalence of this degree to other similar Master's degree. As a result, the career prospects of the students were adversely affected. The Masters' degree holders of this course were eligible to appear for recruitment exams for common posts only, for which the qualification was general undergraduate degree and the position remained the same even after the passing out of the fourth batch (March 2019).

The Government in its reply (October 2020) stated that necessary steps were being taken to frame Statutes and to appoint teachers.

2.5.2.7

Non-compliance with the UGC guidelines on Students' Entitlements

The UGC issued (April 2013) 'Guidelines on Students' Entitlements' to all universities with a view to make the students aware of their entitlements along with other student related services and also to simplify the procedure for redressing grievances. It was mandatory for every college/university to publish these guidelines in full in their prospectus and also to post it on the homepage of the website. The Guidelines, among other things, provided for the following students' entitlements.

- Publishing a document, known as 'Prospectus' specifying the curricula including syllabi, names, academic profile and status of the faculty, mode and frequency of evaluation, duration of the course, academic calendar, comprehensive information about fees or charges of any kind and refund rules.
- Disclosure of full and correct information about any institution of higher education in which the students study or propose to study. Every college/university must disclose in the prospectus and on its website information regarding its status, its affiliation, accreditation rating, physical assets and amenities, membership of governing bodies and minutes of the meetings of bodies like Academic Council/Executive Committee, Sources of income and the financial situation and any other information about its functioning necessary for a student to make a fully informed choice.

Audit noticed the following

- The University did not publish the guidelines in the prospectus. Instead, it published an illegible copy of the guidelines on the website. Publishing of the prospectus in this University is done on the authority of the Academic Council.
- The name, academic profile and the status of the faculty were not

Action being taken to publish a prospectus as indicated. Action has been initiated to provide actual status of infrastructure and full profile of all faculty members in the constituent colleges under KAU.

given in the prospectus.

- The status of available physical assets and amenities was not disclosed in the prospectus.

The Government in its reply (October 2020) stated that all the information required as per the guidelines were made available in the website and continuously updated.

The reply of the Government is not tenable as the guidelines require that the information should be published in the prospectus which is an authoritative document. Further, the webpage of the College of Agriculture at Ambalavayal does not provide the actual status of infrastructure and the webpage of ACCER does not provide full profile of the faculty members.

2.5.2.8

Conduct of Examination

Integrity of the process of conducting examinations which culminates in the award of marks/grades/certificates is of highest concern as it has a bearing on the status of both in the institution/university that conducts the examination and the status. Hence a system should be in place to prevent any possible irregularities in the conduct of examination.

According to the Act (Section 16(m)), the Executive Committee is responsible for the conduct of examination and declaration of results based on the Regulations framed by the Academic Council for conduct of examinations. Further, Section 52 of the Act require the Academic Council to frame regulations on the duties of examiners. The University did not notify any Regulation in this regard.

Audit noticed the following

- Access to the premises of the University press where question

Steps have been initiated for the preparation of University Examination Manual in order to streamline the activities in the examination system and to fix the modalities for the conduct of different examinations in the University. The procedure of printing the question papers in the University Press has been done away with and at present the question papers are sent online. On the day of examination, Professor (Academics) will send the password protected question paper to specific email id of the concerned college, one hour prior to the examination. The password will be sent to the respective Dean of that College. The college authorities will take the required number of print outs and distribute it to the students. The answer book printed at the KAU Press are now machine numbered and are being distributed to each college

<p>papers are printed was not regulated by maintaining a record of visitors to the press.</p> <ul style="list-style-type: none"> • No restriction was placed on the use of mobile phones or other recording devices within the Press which can compromise the secrecy of question papers. • The blank answer sheets printed at the Press were neither machine numbered nor barcoded, as a result they could not be distinguished. • The University did not issue any guidelines regarding the accounting of blank answer sheets. <p>The Government in its reply (October 2020) stated that Regulations prescribing the procedure for the conduct of examinations and duties of examiners would be formulated and that corrective action was initiated on the audit observations regarding printing of question papers and accounting of blank answer sheets. Further, in the exit conference (October 2020), the University stated that CCTV cameras were installed in the press.</p>	<p>under KAU for smooth conduct of fir examinations. The software for issuing barcode has been installed in the University and this system will commence from next semester onwards.</p>
<p>2.5.2.9 Non-compliance to UGC Regulations in the award of Ph.D. Degree.</p> <p>Government of India, Department of Higher Education, had instructed (November 2008) the UGC under Section 22 of the UGC Act, to frame and notify regulations for the award of Ph.D. Degree. Accordingly, UGC notified and published in the Gazette of India (11 July 2009) the UGC (Minimum Standards and Procedure for Award of M.Phil/Ph.D Degrees) Regulations, 2009. This was superseded by the UGC (Minimum Standards and Procedure for Award of M.Phil/Ph.D Degrees) Regulations, 2016. These Regulations, inter alia, prescribed that:</p> <ul style="list-style-type: none"> • All Universities shall admit M.Phil/Doctoral students through an entrance test conducted at the level of individual University. • The University shall issue a Provisional Certificate to the effect 	<p>KAU is admitting students to Doctoral programme from the Academic Year 2020 onwards based on the applicant's performance in the All India Entrance Examination conducted by ICAR-NTA. Action will be taken to issue a provisional certificate as prescribed in the UGC regulations.</p>

that the Degree was awarded in accordance with the provisions of the aforesaid UGC Regulations.

Audit scrutiny revealed the following:

- The University did not conduct an entrance test, instead admitted students to the Ph.D. course on the basis of an interview and the academic merit of the applicant 143 Ph.D degrees were awarded by the University to such students during the period 2014-15 to 2018-19.
- The University did not issue provisional certificate as prescribed in the UGC Regulations.

In the order issued (March 2010) by Government of Kerala for implementing pay scales to university teachers and in subsequent clarifications, Government authorised grant of incentives to holders of Ph.D/M.Phil. Degree and other higher qualifications. The grants of incentive was, among other things, subject to the condition that the Ph.D. degree should have been awarded by a University in accordance with the provisions of UGC Regulations, 2009.

Audit scrutiny revealed that the University had granted advance increments to its faculty members who were directly admitted to its Ph.D. programme and awarded Ph.D by the University. The award of Ph.D by the University was not according to the provisions of the UGC Regulations, 2009 in that, the University had neither conducted an entrance exam nor issued provisional certificate as mandated under the Regulations. The University also granted advance increments to those teaching staff who possessed Ph.D degree from other universities. The provisional certificate submitted by them did not conform to the UGC regulations, as the same did not indicate that the Degree was awarded in accordance with the provisions of the UGC regulations.

The Government in its reply (October 2020) stated that, it would conduct an entrance test for admission to Ph.D as mandated in UGC regulations, from the 2020 Academic year onwards. It was also stated that action would be taken to review the advance increment granted, if any, in contravention of Government order and recoveries would be effected. In the exit conference (October 2020), the Vice-Chancellor stated that the admission to the Ph.D. programme were based on the ICAR guidelines which permitted admission of students on the basis of entrance examination or on the merit of the applicant at the Master's degree level or a combination of both.

The contention of the University that the admission were based on the ICAR guidelines is not tenable, as ICAR guidelines cannot supersede the UGC regulations.

2.5.3

Research

The research initiative undertaken by the University are focused on increasing the productivity of crops currently grown in the state. The research agenda is set through consultations with the farming community and the extension personnel and is based on need assessment by the faculty, the State and National level agencies and institutions engaged in development and research.

The University has officially released 320 varieties of different crops including 121 varieties of rice, the staple food crop of State. The rice varieties 'Jyothi' and 'Uma' released by the University in 1974 and in 1998 respectively, occupy more than 80 percent of the cropped area of the State. During 1980s the University identified a bio-control agent called *Cyrtobagous Salviniae* for successful control of the aquatic weed (*Salvinia molesta*) which infested the water bodies of the States.

'Keramithra' a coconut dehusking tool invented during the 1990s and patented by the University is one of the most popular inventions of the State.

The research projects in Kerala Agricultural University are mainly funded by the State Government, ICAR, Indian Council for Forestry Research and Education, Directorate of Biotechnology, Department of Science and Technology and the Kerala State council for Science Technology and Environment. The projects are implemented by the scientists working in the colleges and research stations of the University. These scientists are also discharging extension and teaching duties. Post graduate and doctoral research projects also contribute to the research outcome.

The Director of Research is in charge of the research management in the University and is supported by nine Associate Directors of Research (one each located in five zones and four at the Headquarters). There are three faculties, namely Agriculture, Forestry and Agricultural Engineering. There are 24 subject specific Project Co-ordination Groups, 19 in agriculture, two in forestry and three in Agricultural Engineering. All the projects, including PG and Ph.D projects, are coordinated by the Professor (Research Co-ordination).

Audit analysed the performance of the University in areas of research product, impact and excellence, implementation of selected projects and in emerging areas of Intellectual Property Management. The audit observations are discussed below:

2.5.3.1 Research Product

In order to maximise the benefits from research, the results of the research activities must be disseminated through publications at the earliest and in the most effective manner. Publication of research article in journals is a criterion considered for appointment of faculty and evaluating their performance for career advancement. It also a mandatory requirement for the award of Masters/Doctoral degrees and an important factor of consideration for ranking of Universities by various agencies. The quality of a research article is relative to the quality of the journal in which it is published.

In agriculture and allied subjects, the quality of a research article is determined by the score allotted by the NAAS to the journal in which it is published. According to the data on research papers submitted by the University to NAEAB for accreditation, a total of 689 papers were published during the period 2014-2018. The Audit findings on the analysis of the data are shown in the following table.

- The fact that 77 out of the total 689 (11 per cent) research papers included in the list submitted to NAEAB were duplications indicates lack of proper system of research data management in the University. As per UGC Establishment and Monitoring of the Internal Quality Assurance Cell in Universities (2012-2017), the IQAC is responsible for the documentation of various programmes/activities of the University leading to quality improvement. As research papers are a key quality indicator, the IQAC of the University should have developed an organised methodology of its documentation. The deficiency in the functioning of IQAC is discussed in paragraph 2.5.2.2.

Publication of a paper normally take 06 months to 18 months in peer-reviewed journals while it is 1-2 months in several non-reviewed journals, which also enjoy NAAS ratings. The list of such journals also keep changing from year to year. Many researches were initially not even aware of the predatory nature of these journals. Moreover, though the value of these publications are rated low there is no strict rule that forbids publication in these journals. Therefore, in order to improve the quality of research products such as high impact quality publications, the following awareness creation measures were undertaken during 2019-20 and 2020-21 period:

- (List of UGC/NAAS accredited journals with annually updated NAAS scores and impact factor was circulated among all faculty and students from DOR) to create awareness among students and faculty on getting research articles published in high quality, NAAS rated journals.
- Six national workshops on Research Publishing and Plagiarism Control were organized for research students and faculty during 2019-20 (5 nos) and 2020-21 (1 no.) under the KAU Library and Information Services.
- Exclusive webinar on quality publications led by national and international experts were organized as part of NAHEP-CAAST

- The University does not have a procedure to verify the quality of journals in which the works are published by its faculty and students. This is evidenced from the fact that 104 (17 per cent) out of the 612 publications showcased by the University as its achievement were in non- NAAS rated/predatory journals. This is also an indication that the University has not adopted the ICAR Guidelines for Internal Evaluation and Forwarding Research Papers to Scientific Journals and Data Management in ICAR Institutes which recommends stringent evaluation before submission of manuscripts to research journals.
- Of the 502 research papers published in NAAS rated journals, 284 (57 per cent) were published in journals having a score of five or belows. They do not qualify for either ICAR accreditation or ranking.

The Minimum benchmark adopted by ICAR for ranking of agricultural Universities in 2017 and 2018 was 0.6 papers per faculty per year, published in journals having NAAS score of above six. Audit mapped the research papers to individual faculty member authors and found that 139 (38 per cent) out of the 367 faculty members as on 30 October 2017, including 37 faculty members posted at various research stations, did not author/co-author even a single research paper during the period of 2014 to 2018. This contributed to low productivity per faculty in terms of research papers published.

The Government in its reply (October 2020) Stated that repetitions were compilation errors made during the effort to make the list as exhaustive as possible, and that individual faculty members were asked to furnish a list of publications for given period. It was further stated that there was a decline in the number of papers published in Non-NAAS rated/predatory journals in proportion to the total numbers,

programme in which 247 members from faculty and students participated. These initiatives are reflected in the enhancement of quality publication as evident from the improvement in ICAR ranking position of KAU from 34th to 19th and achievement of Chancellor's Award for Best University in Kerala (Specialized Category) during 2020-21 for which publications formed a major evaluation criterion. Papers published from KAU during 2019-20 has progressed to 499 numbers, which include 42 papers with impact factor more than one, 270 papers in the category of impact factor less than one and 187 conference proceedings

	<p>indicating heightened awareness and that a single criterion like number of papers published would neither be comprehensive nor adequate enough to capture performance/contribution of the faculty members. In the exit conference (October 2020), the Vice-Chancellor contended that the faculties were engaged in teaching, research and extension activities, therefore papers per faculty should be considered as a criteria only for those faculties engaged in research activities instead of considering the total strength of the faculty.</p> <p>The reply of the University confirms the audit observation regarding lack of effective system for research data management and lack of procedure to verify the quality of journals in which the papers are published. The View expressed in the exit conference cannot be acceded to as the criteria adopted by audit was the same as that adopted by ICAR for ranking purposes, in which, research papers per faculty is determined taking into consideration the total strength of the faculty irrespective of their engagement in teaching, research or extension.</p>	
<p>2.5.3.2</p>	<p>Research Excellence</p> <p>For ranking of agricultural universities, ICAR evaluates their research excellence by considering, among other things, their achievement in release of crop varieties, granting of patents (discussed in para 2.5.3.3), etc. Audit examined the achievement of the University in the above mentioned areas and observed the following;</p> <ul style="list-style-type: none"> Varieties released and notified: The State Seed Sub-Committee under the Department of Agriculture and Farmers' Welfare, Government of Kerala released 47 varieties of crops developed by the University during the period 2014-2018. However, the State 	<ul style="list-style-type: none"> Notification of released varieties <p>The notification involves two mandatory procedures of deposition of seed material to NBPGR Gene Bank and DNA finger printing of varieties. The delay in getting DNA finger printing has impeded the procedure which has been addressed to resolve the crisis.</p> <p>ATR on 2.5.3.2</p> <p>Panniyur 9 and KPCH-1 varieties have been notified</p>

Seed Sub-Committee could not initiate action for notification of these varieties under the Seeds Act, 1966 as the University failed to submit the notification proposal.

The notification is made by the Central Government on the recommendation of the Central Seed Committee. The varieties accepted for release by the State Seed Sub-Committee has to be submitted to the Central Sub-Committee on Crop Standards, Notification and Release of Varieties for notification. For this, the breeder (the University) concerned should submit sufficient copies of the notification proposals in the prescribed proforma to the State Seed Sub-Committee for onward transmission to Central Sub-Committee. This inter-alia includes deposition of seed material to Gene Bank, NBPGR, New Delhi

Audit observed that the University failed to submit the notification proposal despite repeated requests from the Department of Agriculture. The Department of Agriculture can popularise only the notified varieties. In the absence of notification, such newly released varieties could not be included in the seed plan of the Department for procurement of seeds and supply to farmers free of cost.

The Government in its reply (October 2020) stated that notification of varieties involves additional data generation by DNA fingerprinting of varieties. The University has initiated activities in this direction. A proposal for DNA fingerprinting of all varieties as a prerequisite for notification has been developed and work is in progress.

in 2019-20. Also, proposals for notification of the crop varieties, recommended for release in Kerala State by 27th State Seed Sub Committee meeting held on 12/12/2017 at SAMETI, Thiruvananthapuram has been submitted as per Lr. No.R1 /61058/17 dtd. 01-10-2020 of Director of Research, KAU (Copy included-Annexure I). This includes the following varieties:

Sl. No.	Crop	Proposed name of the variety
1	Rice	KAU Pournami (MO-23)
2	Rice	KAU Manu Rathna : (HS 16)
3	Rice	Lavanya (KAU VTL-10)
4	Rice	Jyotsna (KAU VTL - 11)
5	Rice	KAU Supriya (PTB-61)
6	Rice	KAU Akshaya (PTB -62)
7	Culinary melon (Sambar Vellari)	KAU Vishal (CM -12)
8	Garcinia	Nithya

A State plan project on Development of DNA finger printing profile of varieties released by state variety release committee is implemented at College of

		Agriculture, Vellanikkara at a total budget outlay of 45 lakhs which will facilitate the notification of other varieties released by KAU.
2.5.3.3	<p>Intellectual Property Management</p> <p>India as a member of the World Trade Organisation (WTO) is obliged to comply with the Agreement on Trade Related Aspects of Intellectual Property Rights (TRIPS Agreement) which requires the member countries to provide for protection of intellectual property rights (IPRs) in one form or the other, in all fields of technology including agriculture. The IPR, among other things includes patents, protection of plant varieties and Geographical Indication (GI) of Goods. The study of Intellectual Property Rights is a course included in the syllabus of B.Sc. (Hons). Agriculture and is a compulsory course for various disciplines of M.Sc. (Agriculture) programme of the University.</p> <p>The University formed an intellectual property Rights (IPR) Management Cell in 2003 with the aim of (i) Protection and management of the IPR in Agriculture, (ii) Protection of Farmers rights, Breeders rights patents and crop varieties, (iii) Protection of Geographical Indications, (iv) Development of Policy guidelines for IPR and Transfer of Technology in the University, (v) Empowering of farmers, students and faculties to address IPR issues and (vi) organising awareness programmes. The ICAR released (2006) Guidelines for Intellectual Property Management and Technology Transfer/Commercialisation and recommended their adoption by the State Agricultural Universities suitably for internal use. Audit observed</p>	<p>Preventing infringements on GI of Wayanad Jeerakasala Rice</p> <p>Authorized user status under intimation to the University is essential to use the GI tag for Wayanad Jeerakasala rice for which KAU holds the Registered Proprietor status. In order to prevent infringement into farmer/community rights the following actions were taken at IPR cell KAU.</p> <p>ATR on 2.5.3.3</p> <p>Establishment of infringement required legal action for which detailed field level information was collected by the IPR cell of the university. It was observed that the marketed rice held the brand name Wayanad Jeerakasala additional reference as synonym to Wayanadan Kaima by one company and the other one used the brand name Jeerakasala rice which is the popular <i>Wayanadan Kaima</i> that represent small aromatic non-basmati rice cultivated by the farmers in Wayanad district of Kerala and not to Wayanad Jeerakasala Rice. Scientific studies in KAU has proved that Jeerakasala and Kayma are two different cultivars of Wayanad with different plant and grain character.</p>

<p>the following shortcomings in the Intellectual Property Management of the University.</p> <ul style="list-style-type: none"> • Patents <p>ICAR Guidelines prescribe that all research results which are patentable under law and have scope for technology transfer or for advancement of basic and strategic research, should be taken up for patent protection. The technologies developed by the University as a result of its research activities need to be protected against unauthorised use/exploitation by other agencies within and outside the country for commercial gains. Patents obtained under the Patents Act, 1970 offer such protection.</p> <p>Audit noticed that during the period from 2014-15 to 2018-19 the University developed 16 products and transferred their technology, but did not apply for patents except for five of them. Thus, 11 technologies transferred by the University were not protected by applying for patents.</p> <p>The Government in its reply (October 2020) contended that obtaining of patent required five years to six years and that the long wait for completion of the patenting formalities before the technology could be transferred would render many technologies irrelevant.</p> <p>The reply is not tenable as a patent application affords protection to the invention from the date of its filing. The University had applied for patents in respect of five products before transfer of technology thus protecting their patent. However, the technology in respect of remaining 11 products were transferred without applying for patent thus exposing the technology to unauthorised use/exploitation by other agencies as mentioned above.</p>	<p>This was reported to the legal cell of the University to further explore the possibilities of legal action against the cases as it amounted to a mislabeled infringement without claiming GI status or use of GI tag name of Wayanadjeerakashala Rice. As the GI proprietorship of the University was for Wayanadjeerakashala Rice and the name had no direct reference to the brand names used by the reported cases of infringement, Legal counsel of KAU dated 26/03/2020 informed that Section 26(1) a&b of the Geographical Indications of Goods (Registration and Protection) Act, 1999 cannot be applied. Application of rules and laws of sale of Goods Act and Trade Mark Act (1930) was also complex as there was no precise information on the period from which the companies were involved in the sale of the products. Further legal opinion cautioned on the adequate due diligence and enquiries to be carried out in the matter in view of section 73.</p> <p>However, the incident has raised the surveillance of IPR cell of the university and has also got the opinion of GI registry, Chennai that University should promote its role in technical matters as facilitators of GI registration to uphold the farmer's and community rights of GI products leaving the Proprietor status to local Farmer Interest Groups and is being followed as prescribed in the GI Act.</p>
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- **Protection of plant varieties**

Plant varieties cannot be patented in India under the Patents Act, 1970 but they can be protected by registering them under 'The Protection of Plant Varieties and Farmers' Rights (PPV&FR) Act, 2001. The PPV&FR Act, 2001 allows registration of four types of plant varieties, such as new variety, extant variety, farmers' variety and essentially derived variety. The varieties requiring registration should fulfill the criteria of distinctiveness, uniformity and stability (DUS) and should have a single and distinct denomination.

Audit noticed that the University has not initiated action for registration of any of the plant varieties under the PPV&FR Act, 2001 so far (March 2019) despite releasing over 300 varieties of different crops. As a result, the University cannot opt for any remedial measure against unacknowledged/ unauthorised use of the varieties developed by it.

The Government in its reply (October 2020) stated that registration of plant varieties under the PPV&FR Act will be taken up on priority basis.

- **Geographical Indication of Goods.**

The Protection of Agricultural goods indicated to specific geographical territories/regions is governed by the Geographica indication (GI) of Goods Act 1999. GI is an indication that the goods being commercialised under that indication have originated from a definite geographical territory either as an agricultural produce (e.g. Nagpur Orange) or as a natural produce like from mining (e.g. Mussoorie Rock Phosphate) or by manufacturing (Production or processing or preparation e.g. Banarasi Saree) or some specific local brews of tribal areas and it has a special quality or reputation or other characteristics attributable to that origin. GI is the collective intellectual property of the

entire community or society or organisation of the geographical region to which the goods belong.

The IPR Cell of the University has facilitated various farmers' collectives/organisations in the State to obtain GIs for their agricultural produce. The University is the 'registered proprietor' of five GIs and has facilitated obtaining GIs of another five. The efforts of the University on this front have won many accolades, the most recent being the National Intellectual Property Award 2019 instituted by the Indian Intellectual Property Office under the Ministry of Industries and Commerce.

Audit, however, noticed that the IPR cell was not effective in preventing infringements on its GI. The University is a registered proprietor of the GI 'Wayanad Jeerakasala Rice' a traditional aromatic rice variety cultivated in the Wayanad district of Kerala. Any Company or person who wishes to use this GI tag has to get themselves registered as 'authorised users' under intimation to the University. There are no 'authorised users' for the GI 'Wayanad Jeerakasala Rice' as of July 2020. Audit observed that atleast two companies which are not 'authorised users' of the GI Wayanad Jeerakasala rice were marketing the rice branding it as Jeerakasala and also referring to it as 'Wayanadan Kaima' on the packing. Under the product description, the website of one company described it as 'Jeerakasala rice, also known as Wayanadan Kaima, is popular traditional small aromatic non-basmati rice, cultivated by the farmers in Wayanad District in Kerala. This is an indication of a potential infringement of the GI granted to the University.

The Government in its reply (October 2020) stated that the University's contribution in terms of GI registration has been the best in the country and has been nationally acclaimed. However, it may be

noted that it is only a facilitatory in most GI registrations and cannot address legally. It is the responsibility of the owners of the GI registration, the community of practice in our case to proceed against such infringements. The instance referred to involving Jeerakasala rice in Wayanad calls for in depth investigation of scientific and legal nature before establishment of infringement.

The contribution of the University in obtaining Geographical indication is noteworthy and also it cannot address legally infringement cases in which, it is only a facilitator. However, the reply is not tenable in the instance of 'Wayanad Jeerakasala Rice' as it is the 'Registered Proprietor' and not a facilitator. The University's inability to either confirm or deny potential infringement of GI owned by it, when brought to its notice indicates absence of an IP watch system as recommended in the ICAR guidelines.

2.5.3.4

Specific Research Projects

The University formulates new research projects on the basis of the thrust areas identified by various project groups. Each research project is scrutinised by the respective project coordination Groups duly approved by the Faculty Research Council before it is formally commenced. Audit, however, noticed that there was new general guidelines governing the implementation of projects.

The University undertook 265 specific research projects with a total outlay of Rs. 73.06 crore during the period 2014-15 to 2018-19 as detailed below.

Table 2.8: Details of projects undertaken by the University

• Deviation from projects objectives.

A. With respect to defective planning and failure of projects to achieve objectives the following action was taken.

1. All efforts are made to ensure that project implementation do not deviate from the set objectives in future. In ensuring the strict surveillance and evaluation of projects an online monitoring system is under development. This will ensure real time management of projects with evaluation at all levels.

B. Specific to the projects stated in the reference as deviated from the objectives the following action are reported.

1. Deviations reported with respect to pulses project were addressed by completing the Seed Hub building on March 2021. Presently it serves as a processing centre for the pulses produced as envisaged in the project objective. Also machineries for grading and processing have been installed and has completed the processing of around 5 tons of pulses as on date.

2. The diverted use of infrastructure created at RARS, Ambalavayal may be viewed as an adhoc measure to address the contingency of starting of a new college in the remote and tribal district of Wayanad. All arrangements were taken up to see that the functions of lab was achieved uninterrupted along with the academic activities. Also action is underway for the construction of infrastructure exclusively for the college of which ladies hostels were inaugurated and boy's hostel and administrative building are under different stages of completion.

Funding agency	No. of projects approved during the audit period	Outlay (in crore)	No. of projects completed during the audit period
Government of Kerala	123	22.89	19
ICAR	19	7.31	6
External agencies	123	42.86	25
Total	265	73.06	50

Audit selected 54 out of the 265 research projects for detailed review and noticed that four of them failed to achieve the objectives envisaged.

- The following projects did not achieve the objectives due to defective planning.
 - The Project "Development of entrepreneurship and sustainable livelihood for SC/Tribe women through projection of tissue culture plants" which involved developing 15 lakh banana plants at a outlay of 9.35 lakh funded by State Horticulture Mission (SHM) failed as the physical target fixed was far above the infrastructural capacity provided to achieve it.
 - The project "import of planting material by RARS Ambalavayal" which involved import of high yielding varieties of sub-tropical fruits, cut flowers and other perennials from foreign countries to replace the indigenous varieties could not be implemented, inspite of creation of required infrastructure at a cost of 24.28 lakh, due to the failure of the University to get important license

from the Ministry of Agriculture & Farmers Welfare in time.

- In the following projects the University deviated from the project guidelines.
 - The University decentralised the implementation of the project "Creation of Seed Hub for increasing indigenous production of pulses at RARS, Pattambi" to other 13 research stations without the prior concurrence of ICAR, the funding agency, which resulted in unproductive expenditure of 37.47 lakh.
 - The University diverted the infrastructure worth 3.13 crore created for the project "Technology intervention and peoples participation for poverty alleviation in Wayanad district at Ambalavayal to an entirely different purpose, resulting in non-release of the balance fund amounting to Rs. 4.55 crore (59 per cent) by the Government.

The Government in its reply (October 2020) accepted the audit observation on the first project. Regarding importing Planting materials it was stated that import license having validity of only six months was not applied for as the requisite infrastructure had to be readied first and that the import license had been obtained with effect from 28th February 2020. The reply is not acceptable as the University deviated from the approved DPR of the project which set a time frame of one year for implementation.

In respect of the project on Creation of Seed Hub, the University replied that the reason for decentralisation of production was communicated to ICAR and approval sought in December 2017 but denial of sanction was intimated only in December 2018. The reply is not acceptable, as it was not correct on the part of the University to

	<p>implement the Project in decentralised manner without obtaining prior approval of ICAR, the funding agency.</p> <p>Regarding the project on "Technology intervention and people's participation" the University contented that the transfer of infrastructure did not have any impact on other activities but conceded that the resultant delay in implementation had led to non-release of funds. The reply cannot be accepted, as the building constructed for the implementation of the project was being used as class rooms for the College of Agriculture at Ambalavayal compromising the objective of the projects.</p>	
2.5.4	<p>Extension Education</p> <p>The Extension Education Programmes of the Kerala Agricultural University are planned, organised, and co-ordinated by the Director of Extension (DoE) at the University level as mandated under the Act. The basic objectives of the extension education programme is to make available to the farmers and other through the Government Departments concerned., useful information based on research findings. The extension education activities of the University are implemented primarily through the KVKs and other centres functioning under the DoE. The educational institutions and research stations of the University also implement extension education programmes.</p> <p>The planned activities of the KVKs include on-farm trials, frontline demonstration, training and extension programmes. Audit selected three out of the seven KVKs operated by the University in the State for detailed scrutiny and observed that all of them had achieved their targets in the above activities. A noteworthy activity of the University was the practice of deputing Multi-disciplinary Diagnostic-Teams to visit farmers' fields and recommend solutions to various problems reported</p>	<p>To give a new direction to the extension activities of Kerala Agricultural University (KAU), the Directorate of Extension, in close association with the Department of Agriculture, started Block Level Agricultural Knowledge Centres. The 152 blocks in the state of Kerala are linked with 152 scientist of KAU. This new model will help in the speedy transfer of technology. It is in addition to the activities of Krishi Vigyan Kendra and other centres of KAU.</p> <p>The protocol based agricultural advisory has shown good result in the field experiments of Kannur KVK. So now, we are making more efforts to scientifically test protocols for more crops and varieties and for more regions to make the technology transfer process faster and more effective.</p> <p>To improve the ranking of KAU, we are also</p>

<p>by them. It has also designed a programme for the public to interact with the faculty about the latest developments in agricultural sector. Another notable achievement was that of KVK Kannur, which developed a production protocol for rice farming from sowing to harvesting and for value addition by processing and branding of organic rice under the Mayil Grama Panchayath, in Kannur District. As a result, the productivity has enhanced to nine to ten tonnes/hectare are against the State average of 29 tonnes/hectare.</p> <p>ICAR ranks agricultural universities annually based on various parameters under teaching outcome, research and extension. In teaching, parameters with the high score include performance of students in national level examinations. In research, parameter with high score include research papers with high NAAS rating. In extension, parameters with high score includes revenue generation. The University was ranked 14 in the year 2016, but its ranking slide to 34 in 2018. In the year 2019, it improved its ranking to 19 mainly aided by the performance of its students in national level examinations.</p>	<p>constantly monitoring the performance of various units under the Directorate of Extension. However, one of the criteria, where we lost was on ICAR awards. Hence, efforts are taken to prepare the report and present it in a much better way for the best National level KVKs award in 2021-22. One reason for missing marks in this section was that three of our KVKs have already received national awards, and they cannot apply for next five years.</p>
<p>2.5.5 Financial Management</p> <p>The University follows a decentralised financial system. The funds of the University are operated and managed in accordance with the provisions of Articles 45 to 47 of the Act. The Government of Kerala, in exercise of the powers conferred by section 63 of the Act, notified the first statute regarding "Finance Accounts and maintenance and management of all University Funds in General". The University amended the above Statute and issued Notification No. GA/8762/A3/83, dated 29 September 1983. The Statute permits the University to follow the Financial and Accounting Rules of Government of Kerala until such time the University prescribes and adopts its own Financial and Accounting Rules. The Kerala Financial Code mandates</p>	<p>Kerala Agricultural University follows the financial and accounting rules subject to the provision of the KAU Act and Statute shall, mutatis mutandis. Kerala Agricultural University has been filing its annual accounts based on the data and reports generated from the accounting software of KAU, Viz 'UFAST' Since 2011. UFAST is a functional software designed by the IT wing of KAU and manages accounting in tune with the standard accounting principles in force. Now, 'UFAST' has been set to show an accurate financial and accounting data of KAU reflecting the income and expenditure statement as well. The financial position of</p>

that every Government servant should see that proper accounts are maintained for all Government financial transactions with which he is concerned exercising specially strict and close control in regard to the maintenance of proper accounts.

The receipts and expenditure of the University for the period 2014-15 to 2018-19 were as follows.

Table 2.9 Receipts and Expenditure during the period from 2014-15 to 2018-19 (in crore)

Source of Fund	Description	2014-15	2015-16	2016-17	2017-18	2018-19	Total
Plan	Receipt	31.37	29.17	42.25	38.90	15.00	156.69
	Expenditure	21.55	23.94	20.77	14.24	15.61	96.11
	Excess/savings	9.83	5.23	21.47	24.66	-0.61	60.58
Non-Plan	Receipt	208.82	250.53	281.91	324.20	338.09	1403.55
	Expenditure	216.72	260.06	306.19	335.13	343.00	1461.10
	Excess/savings	-7.90	-9.53	-24.28	-10.93	-4.91	-57.55
ICAR (100%)	Receipt	13.92	5.44	10.73	14.92	21.26	66.27

university indicating its assets and liabilities has been made available in the annual accounts from the financial year 2017-18. A comprehensive statement showing the assets and liabilities for all movable and immovable assets of KAU in UFAST is lacking. Owing to the same, University has taken earnest efforts to implement the same in UFAST Accounting Software.

	Expenditure	21.95	16.18	22.45	19.39	19.82	99.79
	Excess/savings	-8.03	-10.74	-11.72	-4.47	1.44	-33.52
	ICAR (75%)						
	Re ceipt	9.47	11.14	9.36	13.40	16.53	59.90
	Expenditure	16.26	17.73	18.23	19.48	16.72	88.42
	Excess/savings	-6.79	-6.59	-8.88	-6.08	-0.19	-28.53
Externals	Re ceipt	36.72	17.20	15.82	18.54	12.30	100.58
	Expenditure	27.18	20.94	13.32	11.11	12.44	84.99
	Excess/savings	9.54	-3.74	2.50	7.43	-0.14	15.59

Audit noticed the following weakness in the financial management of the University.

2.5.5.1	<p>Deficiencies in the UFAST accounting software</p> <p>The University prepares its annual accounts and submits the same to the Government as per Section 47 of the Act and Statute No. 815/79. The annual accounts are prepared through the UFAST software developed internally. The UFAST generates parallel bank statements and reconciles the office cash balance with it instead of the statement generated by bank. The UFAST generated bank balances were found to be different from the actual bank balances. Generation of parallel bank statement through UFAST software and the reconciliation of the book balance with the same is irregular. Audit observed that the UFAST generated bank balances shown in the annual accounts were often modified after their submission as the software allowed adjustments even after the closing of accounts.</p> <p>Audit test checked the bank balances exhibited in the accounts with those generated by UFAST on 19 December 2019 and found that the same did not match with the statements generated for the finalisation of accounts. For instance, the closing balance of Rs. 131.75 crore for the 2016-17 was corrected as Rs. 144.10 crore after the submission of the annual accounts. Consequently, the opening balance of 2017-18 showed an excess balance of Rs. 12.35 crore. Option to enable modifications/adjustments in the items contained in the accounts after their closure and submission to Government is indicative of major deficiency in the Software. Audit also noticed that the accounting software was adopted without certification of its reliability and controls by an external agency. The adoption and use of software without ensuring their security and reliability can lead to malpractices and frauds through manipulation of figures.</p> <p>The Government in its reply (October 2020) accepted the audit</p>	<p>University is filing its annual accounts through UFAST the accounting software prepared by the IT wing of KAU. UFAST generate parallel bank statement and reconciles the bank/cash balances with the statement generated by the bank itself. Due to clerical error, which occurred due to the poor acquaintance with the UFAST software, resulted in erroneous reconciliations at many of the stations/units bank accounts under KAU. It was due to the lack of experience is using UFAST by the staff of various units/stations under KAU. Proper training is now being given to the office personnel who is handling 'UFAST' to avoid such errors. Stations under KAU were forced to reopen the accounts of previous years in order to make correction entries there so as to arrive at actual account balances of various heads in the current year in line with the bank statements. This practice has been dispensed with from the financial years 2017-18 onwards. Also the bank statements generated by concered bank/treasury were uploaded to UFAST while closing the accounts of the stations. Therefore the irregularity in bank reconciliations would not be existing from 2017-18 onwards.</p> <p>The errors in opening balance of 2017-18 shown in UFAST were corrected by correction entries and technical changes were made in UFAST master data and that has been affected the differences in UFAST. But, from the financial year 2017-18 onwards, there</p>
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observation and stated that corrective action was taken to ensure that there was no mismatch between UFAST and bank statements. It was, however, silent about the security and reliability of the Software.

was no changes in the opening/closing figures.

In consonance with the decision of higher level meetings, steps are initiated to arrange technical audit of the UFAST accounting system by an expert team preferably from NIC, Kerala as recommended by KSAD. The developer of the software is the Administrator, have in this case Registrar of the University have been requested to give directions to the Systems Manager to lock the software on time to avoid the possibility of jeopardizing the security and reliability of the software.

The earnest efforts will be taken to complete the process as soon as possible

2.5.5.2

Non-Preparation of Balance Sheet

The Original Kerala Agricultural University Act, 1971 required the University to submit its balance sheet along with the Annual Accounts to the Government. Statute No. 815/79 framed under this Act prescribed responsibility of the Preparation of balance sheet by the comptroller. The Non-preparation of the balance sheet was commented in the Report of the C&AG for the year ended 31 March 1998. Meanwhile, the Act was amended in 2001 removing the clause requiring the submission of balance sheet along with annual accounts to the Government.

The Committee on Public Accounts (PAC) in its 57th report, based on the afore mentioned C&AG Report presented to the legislature on the 17th of March 2000 recommended double entry system in accounting and the valuation of assets. Further Statute prescribing the duties of the

A balance sheet reflecting the financial assets and liabilities for the movable assets have already made in 'UFAST'. Purchase and valuation of immovable assets are now being determined by the 'Administrative Wing' and not by 'Finance'. Earnest efforts are being made to centralize the purchase and valuation of immovable assets through 'UFAST' so that a balance sheet including all assets and liabilities can be made available in the immediate future. University accounting system is entirely different from that of other Universities and Govt. Departments. Being an academic and agricultural research oriented institution, the University has more than 99 stations under it, by which it is

	<p>Comptroller to prepare balance sheet is still force. Moreover, prudent accounting practice warrants the preparation of balance sheet in double entry accounting system.</p> <p>In the reply furnished (October 2020) the Government stated that comprehensive balance sheet was not being made but effort was on to make the balance sheet inclusive of all assets and liabilities of the University. The reply is not tenable as it does not justify the delay in preparation of balance sheet, which is stipulated in the Statutes notified in 1979 and also recommended by the PAC in 2008.</p>	<p>obvious that the assessment of assets and liabilities of all the stations/units spanned across Kerala state of KAU is a time consuming process. However, efforts are being taken in this direction and still continue to include full-fledged double entry system incorporating all assets and liabilities in order to reflect the actual financial position of KAU.</p>
<p>2.5.5.3</p>	<p>Inadequacy of non-plan funds released by Government leading to diversion of money from the PF contribution of employees.</p> <p>According to the Act, every year the Government shall make non-lapsable lump-sum grants to University not less than the estimated net expenditure of pay and allowances of the staff, contingencies, supplies and services of the University and also to meet such additional items of expenditure recurring and non-recurring as the Government may deem necessary for the proper functioning of the University.</p> <p>Audit noticed that, the non plan grants released by the Government to the University were less than the demand and actual expenditure of the University from the year 2000-01. Audit analysed the grant released and non plan expenditure during the period 2014-15 to 2019-20, and the details are as follows:</p> <p>Table 2.10: Details of grants</p>	<p>The Non plan fund released by the Government to the University were less than the actual needs of the University. This resulted in shortage of funds to be transferred to PF account. The shortage to PF Account along with interest amounts to Rs.27.62 crore which now stands as a liability to KAU. The above situation has been brought to the notice at the Government as part of fixation of Non plan grants for the Financial Year 2022-23.</p>

Financial year	Grant requested	Grant received	Non plan Expenditure	Shortage
2014-15	269.48	208.82	246.72	37.90
2015-16	328.53	250.53	260.02	9.49
2016-17	413.59	281.91	306.20	24.29
2017-18	405.24	324.20	419.38	95.18
2018-19	463.50	338.10	343.40	5.30
Total	1880.34	1403.56	1575.72	172.16

Audit noticed that the University met the deficiency in the non-plan grant by diverting amounts from the General Provident Fund (GPF) contributions of the employees, which also depleted the balance in their GPF accounts to the extent of Rs. 96.61 crores. As a result, the University has not been able (February 2020) to transfer the provident fund of the employees who opted for Kerala Veterinary and Animal Sciences University (KVASU) and Kerala University of Fisheries and Ocean Studies (KUFOs) on trifurcation (2011) of the erstwhile Kerala Agricultural University. The amount due to KVASU was Rs. 33.31 crore while the dues to KUFOs has not been ascertained.

The Government in its reply (October 2020) accepted that the inadequacy of non-plan fund released by the Government had caused a deficit of nearly 100 crore in the GPF accounts and that 60 percent of the deficit in GPF subscription amount of the employees had been made good by now. It was also said that GPF closure amounts were being disbursed to employees at the time of their retirement.

2.5.6 Internal Controls

The internal controls of an entity to safeguard its assets, promote accountability and efficiency are generally elaborated in its Accountant manual, Stores and Purchase manual, policy documents etc. Audit noticed that the University did not frame any such manual; and that the duties and powers of various authorities from which the internal controls of the University are derived were not separately documented or declared by Statutes.

Audit noticed the following weakness in the internal control of the University.

University has submitted its own accounting rules to KSAD for perusal and suggestions. The procedure for adopting its own accounting rules is continuing and the accounting manual (UFAST manual) will be framed on the basis of the accounting rules at the earliest.

2.5.6.1

Inadequacies in the functioning of internal audit system

In order to strengthen the existing internal audit system and to bring uniformity in audit, Government of Kerala issued (19 December 2003 and 10 June 2005) guidelines on internal audit to all heads of departments. Accordingly, the University formed three internal audit circles (south, central and North) for conducting internal audit.

Audit observed that the University has not framed its own internal audit manual so far. Further, even though the funds received at the University headquarters are distributed to the various stations coming under the three audit circles, the internal audits were not evenly covered. For example, during the period from 2013-14 to 2017-18, funds were transferred to 65 stations coming under the three circles; but the audit programmes of the period were restricted to South and North Regions only covering 31 centres. More than 52 per cent of the stations were outside audit purview for several years. The University

It may be noted that there are 29 stations under the purview of the IAC (CR) and the audit team comprised of a Section Officer and 2 Assistants. The present staff strength is inadequate to cope with the office work and outer audit. The matter is conveyed to the office of the Registrar for posting one or more permanent Assistant for smooth conducting of audit programmes.

Due to shortage of permanent staff, internal audit under this circle was discontinued from 2014. After the appointment of permanent staff, it was decided to start the internal audit from 2019 onwards. As most of the Assistants were unaware of audit, an HRD training programme on internal audit for the employees from three Internal Audit Circles of KAU for two days was held at Karshaka Bhavan,

	<p>headquarters did not have a record of the internal audit programmes conducted.</p> <p>The above lapses indicate the inadequacy of the existing Internal Audit System to the University and points to the need to improve governance.</p> <p>In its reply (October 2020), the Government has accepted the audit observations and stated that earnest effort was being taken to frame an Internal Audit Manual of the University and to strengthen the Internal Audit System so as to improve governance.</p>	<p>Vellanikara on 04.12.2019 and 5.12.2019. The audit programme could not be implemented due to Covid-19. In September 2020, the audit programme was started and being continued.</p>
<p>2.5.6.2</p>	<p>Non maintenance of Asset Register</p> <p>Statute No. 815/79 mandates the Director of physical plant to maintain an Asset Register containing the details of its plants and buildings. Audit noticed that such register was not being maintained in the University. As a result, the University did not have proper control over its immovable assets.</p> <p>The Government replied (October 2020) that necessary steps were being taken to maintain the Assets Register.</p>	<p>Necessary steps have been taken to maintain the Assets Register on the basis of proforma in the Kerala Financial Code (Form No.23)</p>
<p>2.5.6.3</p>	<p>Irregular Operation of revolving funds</p> <p>Revolving funds are maintained to meet the day to day expenditure on revenue generating activities like production and sales of seeds/seedlings, vegetables, other agricultural produces etc. The Act permits the University to have such other funds as may be prescribed by Statutes.</p> <p>Audit noticed that the University operated 77 revolving funds and had a</p>	<p>As per the S.R.O.No.815/79 Clause 1 (xii) University has the power for the payment of any other expenses not specified in S.R.O.No.815/79 Clause 1(i-xi). Operation of the Revolving fund comes within the scope of the above clause S.R.O.No.815/79 Clause 1 (xii), framing of specific statute for the same is not necessary.</p>

	<p>balance of Rs. 20.94 crore as of March 2019. But none of them had any legal back up as they were not prescribed by Statutes as required under the Act.</p> <p>The Government in its reply (October 2020) stated that the audit observation regarding lack of legal backing was taken note of and that necessary steps would be taken to achieve the objective.</p>	
2.5.6.4	<p>Lack of responsiveness to PAC recommendation</p> <p>The Committee on Public Accounts (PAC) in its 57th report presented to the Legislature on the 17th March 2008 made the following recommendations on the basis of the report of the Comptroller & Auditor General of India for the year ended 31 March 1998.</p> <ul style="list-style-type: none"> ➤ To adopt Double Entry System in accounting and Valuation of assets as mentioned in Paragraph 2.5.5.2 (Recommendation No. 19) ➤ To undertake a work study on the faculty and redeployment of idling/underutilised faculty (Recommendation No. 1.13) <p>Audit noticed that the University has not implemented the recommendations so far. Further, the University had assured the PAC that a register containing the details of the extent of lands was being maintained and was updated. Audit noticed that this was contrary to the facts.</p> <p>The Government replied (October 2020) that necessary steps were being taken to adopt the double entry system in the accounting software of UFAST and to undertake a work study on the faculty and redeployment of idling and underutilised faculty.</p>	<ul style="list-style-type: none"> • <u>Double Entry System</u> As mentioned vide reply to para-2.5.5.2, earnest efforts has now been taken by the university to include full-fledged Double Entry System (especially of immovable assets) in UFAST. • <u>Work Study</u> A committee has been constituted for the work study and redeployment of Teaching posts in the changed scenario of formation of new Colleges/Departments/Centers/Courses/projects with the Director of Research as Chairman, the Director of Extension and Director (Education) as members to assess the workload of stations in respect of various teaching posts under each station.

2.6

Conclusion

The governance frame work of the University was weakened by non-updation of Statutes, ordinance, and Regulations. It was further impacted by non appointment of Officers of the University. In Academic activities, most of the programme offered by it are in demand and are fully subscribed. However, the University failed to comply with the provisions of UGC regulations governing it in recruitment of faculty members and award of Ph.D degree. As a result, faculty members awarded with its Ph.D degrees were not eligible for advance increments as per Government norms. It also failed to comply with ICAR recommendations on establishment of new college at Ambalavayal. In research activities, the number and quality of research papers published in scientific journals per faculty were below benchmark as more than a third of the faculty did not publish research papers. The rice varieties released by the University occupy more than 80 per cent of the cropped area of the State in the case of rice, which is the staple food crop of the State. However, the popularisation of new varieties released by the University was hindered due to non-notification under the seeds Act. The technologies developed and varieties released by the University are not protected by patents and by registration under the PPV & FR Act respectively. The University has obtained and facilitated Geographical Indication for various agricultural products of the State, however it lacks expertise to determine infringements to Geographical Indications owned by it. The internal controls and financial management of the University needs strengthening.

2.7

Recommendations

The Audit recommends that:

- ◆ Immediate steps may be taken to frame/update its Statutes, Ordinances and Regulations to ensure that the appointments of Officers of the University are done regularly and in compliance with the provisions of the Act, UGC Regulations and ICAR guidelines.
- ◆ Revamp its existing recruitment policy so as to attract high calibre faculties capable of strengthening its research output.
- ◆ Evolve a mechanism to monitor and update its compliance to various UGC regulations and ICAR Guidelines on a regular basis.
- ◆ Evolve a system for notification of newly developed and released varieties to be notified under the Seeds Act, 1966.
- ◆ Adopt appropriately the ICAR guidelines relating to Intellectual Property Management and Internal Evaluation of Research papers.
- ◆ Develop own resources to improve its financial position and strengthen internal audit.
- ◆ University may put in place a suitable mechanism to inventorise and monitor the assets available in all its constituent colleges and research units.


Jessy George
 Additional Secretary
 PEN :01406
 Agriculture Department
 Government Secretariat
 Thiruvananthapuram.

DEPARTMENT OF TOURISM

**PUBLIC ACCOUNTS COMMITTEE (2023-26) - REPORT OF THE COMPTROLLER AND
AUDITOR GENERAL OF INDIA ON ECONOMIC SECTOR FOR THE YEAR ENDED**

MARCH 2018 – REMEDIAL MEASURE TAKEN STATEMENT

Para	Gist of the Para	Remedial Measure Taken
3.12	Implementation of projects in Coastal Regulatory Zone (CRZ) areas Due to the non-adherence to the CRZ notification in implementation of projects by the Department of Tourism, the project proponent, there was loss of Government of India assistance to the tune of Rs.9.95 crore in respect of two projects and irregular expenditure of Rs.8.97 crore in respect of three	<u>1. DEVELOPMENT OF KAPPIL BEACH AND BOAT CLUB AS A TOURIST DESTINATION IN KERALA</u> The Ministry of Tourism, Government of India had accorded sanction for the project "Development of Kappil Beach and Boat Club as a major Tourist Destination in Kerala" with central assistance amounting to ₹322.70 lakh. State Government had accorded Administrative Sanction for the same amounting to ₹409 lakh. M/s. KIIDC Ltd was the executing agency for the project, with a completion period given by the Ministry of Tourism for 24 months. The Department had submitted an application for obtaining CRZ clearance from the Kerala Coastal Zone Management Authority (KCZMA), but to no avail. Subsequently, a meeting was conducted by the Hon'ble Chief Minister in the presence of Hon'ble Minister for

<p>projects out of six project examined.</p>	<p>the Welfare of Scheduled Caste and Backward Classes and Tourism on 23.09.2015 and decided to make necessary changes and modification as mentioned below in the existing plan of the Boat club and to seek permission from the Ministry of Environment and Forest for resuming the reconstruction work of the Boat Club at Kappil Beach:-</p> <ol style="list-style-type: none"> 1. The restaurants, toilets and allied constructions will be avoided and it will be made as a waiting room for tourists & users of the Boat Club. 2. The structure will be used only for boat club tourism. <p>Accordingly, the Kerala Coastal Zone Management Authority (KCZMA) vide their letter No. 1718/A3/15/KCZMA/S&TD dated 31.03.2016 granted CRZ clearance considering the importance of the site as a major tourist / pilgrim spot as a special case with the following conditions:-</p> <ol style="list-style-type: none"> 1. All the non-permissible activities in the project shall be removed from the proposal. 2. The construction will be permitted only for the purpose of boat jetty 3. The debris of the demolished part, if any, shall not be put in to the
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water body, thereby contaminating the water and damaging the environment.

The part Utilisation Certificate against the 1st installment sanctioned was submitted on 16.09.2014 along with which the request for the balance amounting to ₹ 258.16 lakhs for the above project was also sought for. But, no response was received from that end.

The Ministry of Tourism, Government of India have stopped the present scheme and launched new 2 schemes namely SWADESH DARSHAN & PRASHAD through which projects are being sanctioned to the States.

The executing agency of the project has now completed the work as per the CRZ clearance granted by Kerala Coastal Zone Management Authority (KCZMA). Necessary directions have been given to the Secretary, DTPC, Thiruvananthapuram for taking over the property including arrangements for operation and the same is underway.

2. HOUSE BOAT TERMINAL AT KAYAMKULAM

The Ministry of Tourism, Government of India, vide letter No.5PSW(27)/2011 Dated. 31/03/2013 have accorded formal sanction

for the "Development of Back waters Circuit in Alappuzha in Back water regions as a Mega Circuit in Kerala" for an amount of ₹4762.48 Lakhs. The State Government as per G.O(Rt) No. 5749/2013/Tourism dated 12.07.2013 had accorded Administrative Sanction for the project at an estimated cost of ₹5225.11 lakhs including Central share of ₹4762.48 Lakhs and ₹462.63 lakh as the State share.

The project component "House Boat Terminal at Kayamkulam" amounts to ₹783.07 lakh, out of which an amount of ₹725.55 lakh was released and the remaining expenditure (State Government) was allocated under State Government Account. The completion period for the project was 36 months ie, the project was to be completed by 11.07.2016.

M/s. Kerala Irrigation Infrastructure Development Corporation Limited (M/s. KIIDC) was the implementing agency for this project and the project was completed on 31.12.2017 with a total cost of ₹850.92. The project was inaugurated by the Hon'ble Chief Minister on 25.02.2019.

CRZ clearance was not obtained hence the U.C. couldn't be given. Steps will be taken to regularize the CRZ clearance. Alappuzha DTTC

has taken over the Houseboat Terminal at Kayamkulam in its current state on 05.08.2023.

3. DEVELOPMENT OF HOUSE BOAT TERMINAL AT

KOTTAPPURAM

Government as per G.O(Rt) No.462/2017/TSM dated 26.09.2017 have accorded Administrative sanction for the project "Development of House Boat Terminal at Kottappuram, Kasargod at a total cost of ₹8,00,00,000/-, which is a part of Malanad North Malabar River Cruise Tourism (MRC). The work was executed through Inland Navigation Department with a completion period of 18 months. Technical sanction was accorded for an amount of ₹7,99,70,000/-. Accordingly, Department had deposited an amount of ₹7,68,14,916/- to the Executive Engineer, Inland Navigation Division, Kannur. The CRZ Clearance from Ministry of Environment, Forests and Climate Change IA-III Section (CRZ) was received for the work and the work was completed on 30.12.2022 and the project was inaugurated on 20.02.2023. The site was handed over to DTPC, Kasargod on 28.03.2023 for running the created assets.

4. DEVELOPMENT OF OTTUMBURAM BEACH

Government as per G.O(Rt) No.5150/2013/TSM dated 24.06.2013

had accorded Administrative sanction for the project "Development of Ottumburam Beach at a total cost of ₹1,39,50,000/-. The work has been executed through M/s. KSCADC with a completion period of 18 months. An amount of ₹1,29,26,968/- was released to the executing agency for the work. The project was completed and UC/CC of the project was also submitted. The CRZ Clearance from Ministry of Environment, Forests and Climate Change IA-III Section (CRZ) was not received for the work. Meanwhile the building number including KSEB connection, was obtained from Tanur Panchayath .

5. CONSTRUCTION OF NEW BUILDING FOR KITTS

TRAINING CENTRE AT THALASSERY

Government as per G.O(Rt) No. 496/2011 TSM dated 19.01.2011, had accorded Administrative Sanction for the the work "Construction of a new building for KITTS Sub Centre at Thalassery at an estimated cost of ₹2,10,00,000/- under Thalassery Heritage Tourism Project. The work has been assigned to KITCO by Tourism Department with completion period of 12 months. The foundation stone for the building was laid by the Hon'ble Minister for Tourism on 31.12.2011 at Dharmadam where a total extent of 49 cents of land comprised in

survey No.30 (4), 35/01 was allotted to Tourism Department by Thalassery Municipality. The proposed building is located 246.50m from sea and 118.00m from river as per the declaration issued by the Secretary, Dharmadam Panchayath. Hence Coastal Regulatory Zone(CRZ) clearance is necessary for availing Panchayath permission. Permission from Panchayath is necessary for temporary power supply connection for construction purpose.

The Executing Agency (M/s KITCO) has furnished application and drawings signed by the architect for obtaining clearance from the CRZ authority. As per the request from KCZMA, an amount of ₹1,00,000/- has been released as processing fee for CRZ Clearance. The 92nd meeting KCZMA held on 16.02.2018 decided not to grant CRZ clearance as the available plot size is not sufficient.

6. DEVELOPMENT OF PAYYAMBALAM BEACH WALKWAY

Government as per G.O.(Rt)No.1952/2012 TSM dt.09/03/2012, had accorded Administrative Sanction for the work "Development of Payyambalam Beach Walk, Kannur at an estimated cost of Rs.2,28,00,000/-". The work has been executed through Harbour Engineering Department, Kannur with a completion period of one year. Based on KCZMA's letter No.1/A2/2013/KCZMA/S&TD Dated

16.05.2013 CRZ clearance was omitted and the rest of the works such as footpath, sitting plaza, planter box and lights were completed in 2021. The completed components are now operated and maintained by Kannur DTPC.

Conclusion

In accordance with the audit point regarding the delay in obtaining CRZ clearance from KCZMA there was the loss of Central funds. Consequently, based on the Circular No. B3/53/2024-ENVT dated 20.04.2024, all Heads of Departments have been instructed to take necessary steps to obtain CRZ clearance proper to the commencement of construction of buildings in the CRZ area.

Henceforth, the Department of Tourism will take all efforts to ensure that all projects under the Department of Tourism shall get all mandatory/ statutory clearances before the commencement of the project.

Moreover, the following facts are also submitted,

- the Department of Tourism is not having much land for the development of Tourism Infrastructure hence arises the need to utilise the land from other departments which eventually

leads to delay in obtaining the necessary permissive sanction from the concerned department.

- from the concerned department.
- Secondly, the tourism projects in Kerala are mainly located in the coastal area or back waters hence the need for CRZ too arises.

arises.

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Annexure III

Appendices from AC's Report

Appendices

Appendix 2.1

Composition of the General Council

(Reference: Paragraph 2.1.1- Page: 6)

Sl. No.	Designation
Ex-Officio members	
1	The Chancellor;
2	The Pro-Chancellor;
3	The Vice-Chancellor;
4	The Agricultural Production Commissioner;
5	The Principal Secretary, the Secretary or the Special Secretary to Government, as the case may be, in the Departments of Agriculture, Finance, Fisheries and Animal Husbandry.
6	The Director of Agriculture;
7	The Director of Animal Husbandry;
8	The Director of Dairy Development;
9	The Director of Fisheries;
10	The Principal Chief Conservator of Forests;
11	The Chairman, Rubber board.
12	The Chairman, Spices Board.
13	The Chairman, Marine Products Export Development Authority.
14	The Director, Central Plantation Crops Research Institute.
15	The Director, Kerala Forest Research Institute.
16	One representative of the Indian Council of Agricultural Research.
17	The Member of the Legislative Assembly representing the constituency in which the Headquarters of the University is situated.
Elected members	
1	Four members elected according to the principles of proportional representation by means of single transferable vote by the members of the Legislative Assembly from among themselves of whom one shall be a member belonging to a Scheduled Caste or a Scheduled Tribe;
2	One member elected by the Deans of Faculties of the University from among themselves.
3	Four members elected by the teachers of the University from among themselves according to the principles of proportional representation by means of single transferable vote.
4	Two members elected by the students of the University from among themselves according to the principles of proportional representation by means of single transferable vote.
5	Two members elected by the non-teaching staff of the University from among themselves according to the principles of proportional representation by means of single transferable vote.
6	Two members elected by the permanent labourers of the University from

	among themselves according to the principles of proportional representation by means of single transferable vote.
	Members nominated by the Chancellor
1	Four eminent Scientists in the field of agriculture and allied subjects from the concerned university or from outside
2	Four farmers of whom one shall be a member belonging to a Scheduled Caste or a Scheduled Tribe and one shall be women.
3	One Member from the association of planters Kerala.
4	Two Presidents of Grama Panchayath.
	Other Members
1	Three members to represent respectively the University of Calicut, Cochin and Kerala, elected by the Senates of the respective Universities.
2	One representative of the Indian Council of Agricultural Research.
3	The member of the Legislative Assembly representing the constituency in which the Headquarters of the University is situated.

Source: University Records

Note:

1. General Council : The Act prescribes that the General Council shall meet at least once in four months. During the period 2014-15 to 2018-19, 15 meetings were held against the prescribed 15.
2. In the composition shown above, one representative of the Indian Council for Agricultural Research and one member of the Legislative Assembly representing the constituency in which the Headquarters of the University is included under both 'Ex-officio' members and 'Other members'.

Appendix 2.2

Composition of the Executive Committee

(Reference: Paragraph 2.1.1 - Page: 6)

Sl. No.	Designation
Ex-Officio members	
1	The Vice-Chancellor;
2	The Agricultural Production Commissioner and the Principal Secretary, the Secretary or the Special Secretary to Government as the case may be in the Finance department.
Other Members	
1	The member representing the Indian Council of Agricultural Research in the General Council;
2	One Dean of Faculty elected by the General Council;
3	One member elected from among the teachers in the General Council, by the Council;
4	Five non-official members of the General Council elected by the Council of whom one shall be a member belonging to a Scheduled Caste and Scheduled Tribe and one shall be a women.
5	The member of the Legislative Assembly representing the constituency in which the Headquarters of the University is situated.

Source: University Records

Note:

The Executive Committee shall meet as and when required. During the period 2014-15 to 2018-19 and a total of 40 meetings were held.

Appendix 2.3

Composition of the Academic Council

(Reference: Paragraph 2.1.1 - Page: 6)

Sl. No.	Designation
1	The Vice-Chancellor;
2	The Deans of Faculties;
3	The Director of Research;
4	The Director of Extension;
5	The Director of Students Welfare;
6	The Librarian;
7	Six members from among the Heads of Departments of the Faculties, nominated by the Chancellor on rotational basis.
8	Three members from among the staff of the research stations of the University, nominated by the Chancellor;
9	Two members from among the Post-Graduate students and one member from among the Research Students of the University, elected in such manner as may be prescribed;
10	One member elected by the teachers (other than the Dean) of each Faculty, from among themselves;
11	The Registrar,
12	Such other members as may be prescribed.
13	The Academic Council may co-opt as members, not more than ten persons for such periods and in such manner as may be prescribed, so as to secure adequate representation to different aspects of agriculture.

Source: University Records

Note:

As per the Statute, the Academic Council shall meet every trimester. But the University switched over to semester system. The Council had met 12 times during the period 2014-15 to 2018-19.

Appendix 2.4

Posts of Teaching Staff not having Statutes

(Reference: Paragraph 2.5.1.1- Page: 9)

SL No.	Post
1	Director of Education
2	Director of Students Welfare
3	Director (Planning)
4	Dean, Forestry
5	Controller of Examination
6	Associate Dean College of Agriculture, Padannakad
7	Associate Dean, College of Horticulture, Vellanikkara
8	Associate Dean, College of Agriculture, Ambalavayal
9	Associate Dean (CCBM)
10	Special Officer, ACCER
11	Associate Director of Research (Planning)
12	Associate Director of Research (GA)
13	Associate Director of Research (M&E)
14	Associate Director of Research (Coconut Mission)
15	Associate Director of Research (Vegetable Mission)
16	Associate Director of Research (NZ), Pilicode
17	Associate Director of Research (Seeds)
18	Associate Director of Research RARS, Kumarakom
19	Associate Director of Research, College of Agriculture, Vellayani
20	Associate Director of Research, RARS, Pattambi
21	Associate Director of Extension (South Zone)
22	Teaching Staff, ACCER

Source: University Records

Appendix- 2.5

Programmes/Colleges not granted Accreditation by NAEAB in September 2020

(Reference: Paragraph 2.5.2.2 - Page: 16)

Sl.	Name of the Programme/College	Reason	Action taken by the University
1	M. Sc.(Ag) in Agricultural Entomology & Nematology in CoA, Vellayani	Not approved for accreditation on the ground Degree nomenclature not adhering to ICAR guidelines.	Appeal for granting accreditation furnished as Department of Agricultural Entomology and Department of Nematology are two separate Departments of College of Agriculture, Vellayani, of which accreditation was requested only for the Department of Agricultural Entomology.
2	M. Sc. (Hort) in Pomology & Floriculture in CoA, Vellayani	Not approved for accreditation on the ground Degree nomenclature not adhering to ICAR guidelines.	Appeal for granting accreditation given as 134 th Meeting of the Academic Council held on 13/12/2019 had bifurcated Department of Pomology and Floriculture into two separate Departments, viz., Department of fruit science and Department of Floriculture & Landscaping as per ICAR nomenclature.
3	Ph. D in Agricultural Entomology & Nematology in College of Agriculture, Vellayani	Not approved for accreditation on the ground Degree nomenclature not adhering to ICAR guidelines.	Appeal for granting accreditation furnished as Department of Agricultural Entomology and Department of Nematology are two separate Departments of College of Agriculture, Vellayani, of which accreditation was requested only for the Department of Agricultural Entomology.
4	Ph. D in Pomology & Floriculture in College of Agriculture, Vellayani	Not approved for accreditation on the ground Degree nomenclature not adhering to ICAR guidelines.	Appeal for granting accreditation given as 134 th Meeting of the Academic Council held on 13/12/2019 had bifurcated Department of Pomology and Floriculture into two separate Departments, viz., Department of fruit science and Department of Floriculture & Landscaping as per ICAR nomenclature.
5	B. Tech in Food Engineering in KCAE & T, Tavanur	Not approved for accreditation on the ground Degree nomenclature not adhering to ICAR guidelines.	Appeal given. The nomenclature and syllabus was changed as per the recommendation of the ICAR's 5 th Deans' committee in 2019 as B.Tech (Food Technology). From 2020 admission onwards, KAU is admitting students to B.Tech (Food Technology) programmes.
6	Ph. D in Processing & Food Engineering in KCAE & T, Tavanur	Not approved for accreditation on the ground Degree nomenclature not adhering to ICAR guidelines.	Appeal furnished to ICAR. The nomenclature of this programme has been changed from Ph. D in Agricultural Processing & Food Engineering to Ph. D in Processing & Food Engineering from 2019 admission onwards as per the recommendation of ICAR.

Sl.	Name of the Programme/College	Reason	Action taken by the University
7	College of Co-Operation, Banking & Management, Vellanikkara, KAU, Thrissur and its following programmes • B.Sc. (Hons.) Co-Operation & Banking • M.Sc. (C&B) in Rural Marketing Management • M.Sc. (C&B) in Rural Banking & Finance Management • M.Sc. (C&B) in Co-operative Management • Ph.D (C&B) in Rural Marketing Management	Not approved for accreditation on the ground Degree nomenclature not adhering to ICAR guidelines.	Academic Council has decided to have further discussions with stakeholders regarding changing the nomenclature of programmes as it may affect employment of the graduates.
8	Academy of Climate Change Adaption Education Sit Research Vellanikkara, KAU, Thrissur and its following programmes • B.Sc. (Integrated) Climate Change Adaptation • M.Sc. (Integrated) Climate Change Adaptation	Not approved for accreditation on the ground Degree nomenclature not adhering to ICAR guidelines.	Changed to 4+2 system as per ICAR guidelines.
9	Integrated B.Sc. and M. Sc. programmes in Biotechnology	Not approved for accreditation on the ground Degree nomenclature not adhering to ICAR guidelines.	Changed to 4+2 system as per ICAR guidelines.

Source: University Records