

MONUMENTS OF NATIONAL IMPORTANCE

THE URGENT NEED FOR RATIONALIZATION



January 2023

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23rd January, 2023

PREFACE

I am pleased to introduce this report on “Monuments of National Importance: The Urgent Need for Rationalization”. India currently has 3695 Monuments of National Importance (MNI) and the responsibility of protecting them vests with the Archeological Survey of India (ASI). Since the list of MNI has not been comprehensively reviewed since independence it has become unwieldy. Therefore, the current list needs to be immediately scrutinised and rationalised.

The Report analyses various problems associated with the current list of MNI including: (a) selection errors; (b) geographically skewed distribution of monuments; (c) inadequate expenditure on protection of monuments.

Various minor colonial structures like graves and cemeteries are being considered as ‘monuments of national importance’. The list also includes monuments with local significance and not necessarily of national importance declared as MNI. Even preservation and upkeep of many of these monuments are not satisfactory. Moreover, 24 monuments are ‘untraceable’. Not only does India spend an inadequate amount of money on preservation and upkeep of monuments of national importance, we have not come up with a sustainable revenue generation models over the last several decades.

Key recommendations include increasing allocation of funds for protection and maintenance of MNI, denotifying minor structures as monuments of national importance, transferring monuments with local importance to the respective states and adding new monuments to the list.

The Report was prepared by Sanjeev Sanyal, Member, EAC-PM, Jayasimha K R, Assistant Consultant and Apurv Kumar Mishra, Consultant, EAC-PM. I wholeheartedly commend their efforts and hard work in preparing this report.

I express my thanks to Mr. Govind Mohan, Secretary, Ministry of Culture, V Vidyavathi, Director General, Archaeological Survey of India (ASI) and Alok Tripathi, Additional Director General, ASI for their inputs in preparing the report.

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Table of Contents

Executive Summary	1
I. Introduction	6
II. Issues with the Current List of Monuments of National Importance	9
1. Selection Errors	9
2. Geographically Skewed Distribution of Monuments of National Importance	18
3. Inadequate and Geographically Skewed Expenditure on Upkeep of Monuments	19
III. Lack of Information on Monuments of National Importance	22
IV. What is the Source for the Present Skewed and Unwieldy List?	25
V. Sources of Other Problems	27
VI. Recommendations	31
Annexures	34
Annexure A: Number of monuments protected at state-level by the respective states	34
Annexure B: List of British graves/cemeteries treated as monuments of national importance	35
Annexure C: Kos Minars declared as monuments of national importance	38
Annexure D: Monuments of national importance declared under the 1951 Act	41
Annexure E: Standard Operating Procedure (SoP) followed by ASI for declaring monuments of national importance	55
Annexure F: Sample of Form B	56
Image Sources	58
References	58

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Executive Summary

India currently has 3695 ‘Monuments of National Importance’ (MNI) that are under the protection of Archaeological Survey of India (ASI). The Ancient Monuments and Archaeological Sites and Remains Act (AMASR Act), 1958 (amended in 2010) provides for the declaration and conservation of ancient and historical monuments and archaeological sites and remains of national importance. Occasionally there are debates about the nature and scope of preservation and protection of these monuments, allocation of funds, quality of expenditure, quality of visitor amenities at the monuments, unclear roles and responsibilities of the National Monuments Authority (NMA) and so on. However, there has been almost no discussion about the existing list of monuments of national importance and how a monument or a site is so declared. The list has also been kept outside the ambit of any review due to which it has become unwieldy. Scores of minor and insignificant monuments have been declared as MNI. Therefore, the current list requires immediate attention for drastic rationalisation.

Once a monument or a site is declared to be of national importance, they come under the supervision of ASI which functions under the provisions of the AMASR Act, 1958. One-hundred-meter radius of the monument is then considered a ‘prohibited area’ where there is a ban on construction activities. Further 200 meters (i.e. 100+200 meters) is considered a ‘regulated area’ where there are regulations on construction.

There are several problems plaguing the current list of MNI. This report examines three major problem areas. The report also analyses sources of these problems and provides actionable policy prescriptions/recommendations. Three major problem areas with the current list of monuments of national importance are:

1. Selection Errors:
 - a. Minor monuments considered as monuments of national importance
 - b. Movable antiquities treated as monuments of national importance
 - c. Untraceable monuments still being considered as monuments of national importance
2. Geographically Skewed Distribution of Monuments
3. Inadequate and Geographically Skewed Expenditure on Upkeep of Monuments

1. Selection Errors

One of the major problems with the current list relates to the errors in the selection of monuments. A large number of MNI seem not to have national importance or historical or cultural significance. Our analysis estimates that around a quarter of the current list of 3695 MNI may not have ‘national importance’ per se.

The three significant selection errors are: (a) minor monuments as monuments of national importance; (b) movable antiquities considered as monuments of national importance; (c) untraceable monuments still being considered as monuments of national importance.

(a) Minor monuments as monuments of national importance

In the current list there are an inordinate number of minor monuments that have been declared as monuments of national importance. For instance, around 75 graves/cemeteries of British officers and soldiers of neither architectural significance nor historical or cultural importance. For example, a grave erected in the memory of Lieutenant H. Forbes in Suchima in Kohima district, Nagaland. Lieutenant Forbes was a British officer who died after being mortally injured during an assault with the Naga villagers at Suchima in 1879. The memorial structure has no architectural significance or cultural value and the individual was of no historical consequence. Yet, this structure gets the same level of protection as our most cherished monuments like Ellora Caves or Taj Mahal or group of monuments at Hampi !

The list also includes around 109 'Kos Minars' – plain-looking brick or lime mortar columns that acted as milestones on Mughal highways – which have been declared as monuments of national importance. Although there is a need for protecting Kos Minars, it is unclear why they should be treated as national monuments.

(b) Movable antiquities treated as monuments of national importance

The list includes several moveable, standalone 'antiquities' like pieces of sculpture, statues, cannons etc. which are being treated as 'monuments'. An example of a standalone antiquity considered as a monument is the small statue of a tiger belonging to the 17th century near Kumta in Uttara Kannada district of Karnataka. The statue is about one metre in length, 50 cm in width and 40 cm in thickness. Not only is it difficult to provide protection to an isolated standalone antiquity located in the open, the imposition of 'prohibited' area and 'regulated' area rules around national monuments often causes complications and logistical problems for development activities. Antiquities should not be included in the MNI list.

(c) Untraceable monuments still being considered as monuments of national importance

Finally, apart from minor monuments and antiquities being considered MNI, monuments which are not traceable are still included in the list of MNI.

Comptroller and Auditor General's (CAG) *Performance Audit of Preservation and Conservation of Monuments and Antiquities* (2013)¹ reported that 92 monuments and sites that were declared as monuments of national importance were untraceable. This was the outcome of a physical inspection carried out by CAG along with the ASI for the purpose of the performance audit. It is important to note that out of 3695 MNI, only 1655 were physically inspected. Therefore, it is likely that the actual number of missing monuments is higher than the number reported. Some examples of untraceable monuments include: Kos Minar 13 in Mujessar in Haryana; the remains of a copper temple in Lohit, Arunachal Pradesh.

¹ Comptroller and Auditor General of India. *Performance Audit of Preservation and Conservation of Monuments and Antiquities*, Report No.18 of 2013 (Performance Audit). The report can be accessed here: <https://cag.gov.in/en/audit-report/details/770>

Later ASI traced/identified 42 monuments that physically existed, 14 affected due to urbanization and 12 submerged under reservoirs dams. The remaining 24 monuments and sites still remain untraceable. Despite many monuments and sites being untraceable for decades now, they still continue to be included in the list of MNI.

While the above examples are of monuments that are not traceable, there is a case of a statue that was exported but is still being treated as a monument of national importance. The statue of John Nicolson, a British brigadier, that once stood in front of Kashmiri Gate in Delhi was shipped to Northern Ireland in 1958. Despite being exported to another country over six decades ago, the statue still continues to be in the list of monuments of national importance!

2. Geographically Skewed Distribution of Monuments

Though monuments of national importance are spread across the country, there is an imbalance in their geographical distribution. Over 60% (2238 out of 3695) of them are located in just five states: Uttar Pradesh, Karnataka, Tamil Nadu, Madhya Pradesh and Maharashtra. By way of illustration, while the city of Delhi alone has 173 MNIs, a large state like Telangana has only eight. Culturally and historically significant states like Bihar (70), Odisha (80), Chhattisgarh (46) and Kerala (29) have disproportionately fewer MNI.

While it is understandable that a historically important city like Delhi will have a cluster of sites, large forts and palaces count as one site. Therefore, the monuments list from Delhi contains dozens of minor monuments, including obscure tombs, declared as MNI. An example of this is Chhoti Gumti in Green Park area which is a small domed building that houses an unknown grave said to be of the Lodhi period.

3. Inadequate and Geographically Skewed Expenditure on Upkeep of Monuments

India's expenditure on monuments of national importance is woefully little and inadequate. Even the little amount spent needs to be better utilised for proper upkeep of monuments. A significant proportion of the allocated amount is spent on peripheral activities and annual maintenance. In 2019-20 the budgetary allocation for "conservation, preservation and environmental development" of 3695 MNI was only INR 428 crores. This works out to a paltry sum of INR 11 lakhs per MNI.

Compounding the problem of inadequate allocation and expenditure is the issue of imbalance in geographical distribution of funds for the protection of monuments. Of the INR 428 crores allocated in 2019-20, the city of Delhi with 173 monuments was allotted INR 18.5 crores, while Uttar Pradesh with 745 monuments was allotted just INR 15.95. Maharashtra with 286 monuments was only allotted INR 20.98 crores.

The fiscal imbalance is aggravated because the revenue collected at monuments through various sources like ticketing, photography, filming, etc. (at selected monuments of national importance) is not utilized either by the Ministry of Culture or by the ASI. The revenue amount is deposited in the Consolidated Fund of India. Even as the budgetary allocation for the upkeep

and conservation of monuments has been historically low, the government has not come up with other sustainable revenue generation models over the last several decades.

There is another issue related to information available on monuments at their locations. A large number of monuments do not have notice boards that provide basic information about the historical, cultural or architectural significance of the monuments and why they are considered monuments of national importance.

Sources of the Problems

One of the major sources of the problem plaguing the identification and preservation of monuments of national importance lies in the AMASR Act, 1958 itself. Neither the Act nor the National Policy for Conservation (2014) have defined what the term ‘national importance’ means. The Act also does not have a substantive process/criteria prescribed for identifying a monument as a monument of national importance. In absence of well-defined principles, the selection of monuments of national importance seems to be arbitrary. ASI has a Standard Operating Procedure (SoP) which entails filling of Form B and formation of a Technical Evaluation Committee. These requirements are at best a procedural formality.

Out of the current 3695 monuments of national importance, 2584 of them got shifted *en masse* from the colonial-era list. Between 1947 and the passing of the AMASR Act 1958, another 736 monuments were added to the list, of these over 444 were from the princely states. The 1958 Act then declared all of them to be of national importance without reviewing/scrutinising the list. Moreover, there is no comprehensive database of all the 3695 MNI available with the ASI which has information on their provenance, including historical importance, geographical description, cultural and architectural significance. Also, the list has largely been kept outside the ambit of any kind of review or scrutiny.

The amendment to AMASR Act, 1958 in 2010 established the National Monuments Authority (NMA). The Act then mandated NMA to prepare bye-laws for all the 3695 monuments. However, in the past 11 years, NMA has framed bye-laws for only 126 MNI, most of which are awaiting the nod of ASI.

Recommendations in Brief

- ASI should come up with substantive criteria and a detailed procedure for declaring monuments to be of national importance. AMASR Act, 1958 may be amended to define parameters like national importance and elucidate what constitutes architectural, historical and cultural significance. However, it may be simpler to do it through an executive order.
- ASI should publish a book of notifications with detailed information about the provenance of monuments of national importance.
- Monuments with local importance should be handed over to the respective states for their protection and upkeep. All the states should be encouraged to have their own

specialised institutions for the protection of monuments, archaeology research and excavations. This will help facilitate the transfer of monuments with local importance to states.

- Standalone antiquities should be removed from the list of monuments of national importance. Wherever possible, they may be shifted to museums for better upkeep.
- Untraceable and minor monuments should be denotified at the earliest.
- An effort should be made to restore geographical balance in the list of MNI and new monuments should be added to this list based on well-defined criteria and procedures.
- Allocation of funds for the protection of monuments of national importance should be increased. At the same time, revenue streams such as tickets, events, fees and other sources should be leveraged more proactively and the proceeds should be retained by ASI.
- Separation of responsibilities between ASI (maintenance of monuments) and NMA (development of surrounding area) seems to not have worked. It is advisable to merge these responsibilities and give them to NMA. The main ASI should focus only on archaeology research, excavation, restorations and maintenance of museums. NMA can function as an autonomous body under ASI.

Most of the above recommendations can be implemented through executive orders and do not need changes in the AMASR Act, 1958.

I. Introduction

India's rich and diverse cultural heritage has a huge corpus of built heritage including ancient and historical monuments and archaeological sites and remains. These monuments, sites and remains should be preserved and valued as they represent our unique culture and history. Article 49 of the Constitution enjoins the State to protect the historical and cultural heritage of the country. It reads as follows:

“It shall be the obligation of the State to protect every monument or place or object of artistic or historic interests, declared by or under law made by Parliament to be of national importance, from spoliation, disfigurement, destruction, removal, disposal or export, as the case may be.”

Further, Article 51A of the Constitution stipulates that it shall be the duty of every citizen of India “to value and preserve the rich heritage of our composite culture.” In accordance with these constitutional provisions, the Ancient Monuments and Archaeological Sites and Remains Act, 1958 (AMASR Act, 1958) was enacted to better preserve the historical and archaeological wealth of the country. This Act provides for the preservation of ancient and historical monuments and archaeological sites and remains which have been declared to be of ‘national importance’ under the law. It has been amended once in 2010².

As of August 2022, India had 3695 Monuments of National Importance³ (MNI) under the AMASR Act, 1958⁴. The list includes temples, churches, mosques, stupas, forts, caves, palaces, colonial monuments/sites, water systems (tanks and baolis), pre-historic sites, archaeological sites, archaeological remains among others.

Prior to AMASR Act, 1958, the Ancient Monuments Preservation Act, 1904 provided for the preservation of ancient monuments and of objects of archaeological, historical, or artistic interest. The 1904 Act did not mention the term ‘national importance’. In 1951, the Ancient and Historical Monuments and Archaeological Sites and Remains (Declaration of National Importance) Act was enacted. It was in the 1951 Act that the term ‘national importance’ was mentioned for the first time. However, neither the 1951 Act nor the 1958 Act defined the term ‘national importance’.

Allocation of legislative responsibility for the protection of cultural heritage is spread across all three lists of the seventh schedule of the Indian constitution. Entry No. 67 of the Union list directs the Union Government to protect “Ancient and historical monuments and records, and archaeological sites and remains, [declared by or under law made by Parliament] to be of national importance”. Similarly, the responsibility for the protection of “ancient and historical monuments and records other than those declared by or under law made by Parliament to be of national importance” falls upon the state governments under Entry No. 12 of the State list. Finally, “Archaeological sites and remains other than those declared by or under

² The Ancient Monuments and Archaeological Sites and Remains (Amendment and Validation Act), 2010

³ Throughout this Report, the term *monuments* refers to ‘ancient and historical monuments and archaeological sites and remains’ protected as monuments of national importance under AMASR Act, 1958

⁴ The list of all the 3695 MNI under ASI can be accessed here: <https://asi.nic.in/alphabetical-list-of-monuments/>

law made by Parliament to be of national importance” is mentioned in Entry No. 40 of the Concurrent list.

At the Union level, the Ministry of Culture is responsible for the identification, preservation and conservation of ancient and historical monuments and archaeological sites and remains of national importance. Archaeological Survey of India (ASI), which comes under the Ministry of Culture, is the nodal agency for archaeological research, excavation and maintenance of ancient monuments and archaeological sites and remains of national importance. ASI implements and regulates AMASR Act, 1958 and the Antiquities and Art Treasures Act, 1972.

Table 1: State-wise numbers of monuments of national importance (as on August 2022)

State/ Union Territory	No. of Monuments	State/ Union Territory	No. of Monuments
Andhra Pradesh	135	Manipur	1
Arunachal Pradesh	3	Meghalaya	8
Assam	55	Mizoram	1
Bihar	70	Nagaland	4
Chhattisgarh	46	N.C.T. Delhi	173
Daman & Diu (U.T)	11	Odisha	80
Goa	21	Puducherry (U.T)	7
Gujarat	205	Punjab	33
Haryana	91	Rajasthan	163
Himachal Pradesh	40	Sikkim	3
Jammu & Kashmir (U.T)	56	Telangana	8
Jharkhand	13	Tamil Nadu	412
Karnataka	506	Tripura	8
Kerala	29	Uttar Pradesh	743
Ladakh (U.T)	15	Uttarakhand	43
Madhya Pradesh	291	West Bengal	135
Maharashtra	286	Total	3695

Source: Compiled by EAC-PM

Apart from monuments of national importance, there are 4506 monuments and sites that are protected at the state level by the respective states (see Annexure A).

There are various problems plaguing the current list of monuments of national importance. The list is not periodically reviewed as a result of which it has become unwieldy. Absence of clear criteria and procedures for the identification, selection and declaration of monuments to be of national importance is one the major sources of the problem. Although ASI has a Standard Operating Procedure (SoP) which includes filling up a Form B for declaring a monument to be of national importance they seem to be mere procedural formalities.

This has led to three major categories of selection errors including: minor monuments, monuments with local importance (not national importance per se) and antiquities being protected as monuments of national importance. On the other hand, neither AMASR Act, 1958 nor the National Policy for Conservation (2014) have defined the term ‘national importance’.

Under the AMASR Act, once a monument or a site is declared to be of national importance, one-hundred-meter radius of the monument is considered a ‘prohibited area’ where there is a ban on construction activities. Further two-hundred-meter radius (i.e. 100+200 meters) is considered a ‘regulated area’ where there are regulations on construction. This often creates tension between imperatives to protect a monument on one hand and important development projects on the other.

According to EAC-PM analysis, around a quarter of monuments and sites declared as monuments of national importance may not have national significance, be it historically, culturally or architecturally. While many among them have local/regional significance, scores of minor monuments have been declared as MNI.

The amendment to AMASR Act, 1958 in 2010 established the National Monuments Authority (NMA). The Act then mandated NMA to prepare bye-laws for all the 3695 monuments. However, in the past 11 years, NMA has framed bye-laws for only 126 MNI, most of which are awaiting the nod of ASI⁵.

Basic Legal Framework of AMASR Act, 1958

Section 4 of the AMASR Act, 1958 provides the Central Government the power to declare ancient monuments, etc., to be of national importance. The section reads as follows:

(1) Where the Central Government is of opinion that any ancient monument or archaeological site and remains not included in section 3 is of national importance, it may, by notification in the Official Gazette, give two months’ notice of its intention to declare such ancient monument or archaeological site and remains to be of national importance;

Section 2 (a) of the AMASR Act, 1958 defines “ancient monument” as follows:

“ancient monument” means any structure, erection or monument, or any tumulus or place of interment, or any cave, rock-sculpture, inscription or monolith, which is of historical, archaeological or artistic interest and which has been in existence for not less than one hundred years, and includes—

- (i) the remains of an ancient monument,*
- (ii) the site of an ancient monument....*

Section 2 (d) of the Act defines “archaeological site and remains” as follows:

“archaeological site and remains” means any area which contains or is reasonably believed to contain ruins or relics of historical or archaeological importance which have been in existence for not less than one hundred years, and includes—

- (i) such portion of land adjoining the area as may be required for fencing or covering in or otherwise preserving it, and*
- (ii) the means of access to, and convenient inspection of the area*

However, the Act does not define the term ‘national importance’.

⁵ Economic Times. *Heritage by-laws of 126 protected monuments completed; Taj Mahal, Qutab Minar await ASI nod.* 24 May, 2022. Retrieved from: <https://economictimes.indiatimes.com/news/india/heritage-by-laws-of-126-protected-monuments-completed-taj-mahal-qutab-minar-await-asi-nod/articleshow/91771323.cms>

II. Issues with the Current List of Monuments of National Importance

This chapter delves into three key issues that plague the current list of monuments of national importance. They are:

1. Selection Errors:
 - a. Minor monuments considered as monuments of national importance
 - b. Movable antiquities treated as monuments of national importance
 - c. Untraceable monuments still being considered as monuments of national importance
2. Geographically Skewed Distribution of Monuments
3. Inadequate and Geographically Skewed Expenditure on Upkeep of Monuments

1. Selection Errors

One of the major problems with the current list of monuments of national importance is errors in the selection of monuments. Firstly, there are several monuments that have been declared as MNI but they may not have national importance or historical or cultural significance. This category includes monuments which may have local/regional significance and also other minor structures which do not fulfil even that criteria. Secondly, several standalone ‘antiquities’ which do not qualify as ‘monuments’ have been declared as MNI. Lastly, various monuments that are untraceable are still considered as MNI.

This is a clear indication of the fact that the list of monuments of national importance has not been scrutinised and periodically reviewed. Therefore, there is a strong case to review and rationalise the current list. Our internal analysis estimates that around a quarter of the current 3695 monuments of national importance may not have ‘national importance’ per se.

1 (a) Minor monuments considered as monuments of national importance

Even a cursory glance at the list of 3695 monuments of national importance reveals that many monuments declared as MNI do not have requisite cultural or historical significance meriting national protection. While many of them have regional importance, several are minor structures that are insignificant even at the state level.

For example, around 75 graves/cemeteries of British soldiers and officers are considered monuments of national importance. The List of graves and cemeteries of British soldiers and officials considered as MNI is placed at Annexure B. Apart from the 75 British graves and cemeteries, there are several colonial graves and cemeteries belonging to the French and Dutch that have been protected as MNI.

An example of this is the two British-era graves (see Figure 1) located on Manki-Kumta Road near Kumta in Uttara Kannada district of Karnataka. According to the information

available on the website of ASI's Dharwad Circle⁶, the graves belonging to two British are located within a short-walled enclosure. They have been constructed using laterite blocks and were built between 1877-1880. As per the gravestone, one grave belongs to John Albert Cope of London who died in 1880. He served as an engineer in the Public Works Department. The other grave belongs to Henry Gassen of Warwick who died in 1877. Gassen worked for the Wests Company of cotton ginnerers.

Figure 1: Graves of John Albert Cope and Henry Gassen located on Manki-Kumta Road, Uttara Kannada district, Karnataka



As can be seen from Figure 1, these graves have neither historical significance nor cultural importance nor architectural value. Yet, these graves have been considered as monuments of national importance. Such graves seem to not have even state-level significance.

Another example of minor British monuments treated as MNI are the memorials erected in the memory of two British officers- G H Damant and Major Cook- located in Khonoma of Kohima district in Nagaland (see Figure 2). G H Damant was a British political officer in the Naga Hills. He was killed by Naga villagers in the 1870s during an assault. Near the memorial of G H Damant stands another memorial stone erected in the memory of Major Cook who was also shot dead by the Naga villagers in the same year.

Moreover, a stone cairn has been erected at the place where the body of Damant was buried in the garden of the deputy commissioner's house in Kohima⁷. Even this minor structure erected in the honour of a colonial officer is a separate item in the list of MNI, in addition to the memorials mentioned above.

⁶ ASI Dharwad circle, see <http://www.asidharwadcircle.in/monument/tombs-on-the-right-side-of-the-manki-kumta-road/>

⁷ ASI Guwahati circle, see <http://asiguwahaticircle.gov.in/stone%20cairn.html>

Figure 2: Memorial erected in the memory of G H Damant in Khonoma, Nagaland



An important point to be noted here is that Nagaland has just four monuments of national importance. Out of the four, three of them are graves/memorials erected in memory of British officers who were killed by the Nagas. They are: (i) memorial of Mr. G.H. Damant and Major Cook in Khonoma, (ii) stone cairn erected in memory of G H Damant in Kohima and (iii) grave of Lt. H Forbe in Suchima.

While the above examples are of colonial sites, there are other monuments like Kos Minars that have been considered as MNI but do not necessarily have national importance. Kos Minars are mile pillars that were erected during the time of Sher Shah Suri and some Mughal rulers. These milestones, generally a round pillar built with bricks and plastered over with lime, with a height of around 30 feet standing on a masonry platform, were erected on Mughul highways to mark the distance of one *kos*, i.e. 3.2 km. Around 109 Kos Minars primarily located in the states of Punjab, Haryana, Uttar Pradesh and Rajasthan have been given the status of monuments of national importance. The list of Kos Minars declared as monuments of national importance is placed at Annexure C.

Kos Minars account for 49 of Haryana's 91 monuments of national importance, which means that approximately 53% of monuments of national importance in Haryana are Kos Minars. Two Kos Minars in Haryana - Kosa Minar 13 in Mujessar and Kos Minar in Sahabad - are missing. In Punjab there are 33 monuments of national importance out of which 13 are Kos Minars (approximately 40%).

Many Kos Minars are located along highways and other arterial roads. Some are even located in the middle of agriculture fields. Since they are considered as MNI, rules relating to the prohibited and regulated areas apply around Kos Minars. This has led to various problems in the execution of important development projects including expansion of highways and roads.

It has also led to complications in land-use patterns as many Kos Minars are today in the middle of agriculture fields.

Figure 3: Kos Minar on Ajmer-Kakaria Road in Kakariya, Rajasthan



While there is a need for protecting Kos Minars, it is unclear why they should be treated as national monuments. It is better to offer Kos Minars more limited protection, perhaps as state-level monuments and transfer them to the respective states for protection.

Another example of a monument in the list of MNI with regional significance and not of national importance is the Chhoti Gumti (see Figure 4) located in the Green Park area of Delhi. The cultural notice board outside Chhoti Gumti provides the following information:

The ‘small’ doomed building’ as the name Chhoti Gumti implies, refers to the low height and relatively small area of 8 square meters that the structure occupies. The dome and the battlemented parapet around it appear large in proportion to the low walls. The remnants of a grave in it tell us that this was a tomb but it is not known who is buried here as there is no historical record of it. The style and ornamentation of the building, such as the painted medallion on the ceiling of the dome, suggest that it belongs to the Lodhi period.

The above passage clearly mentions that not much is known about the structure. The style and ornamentation of the structure only “suggest” that it belongs to the Lodhi period. There are no historical records of the tomb inside the structure either.

Looking at the image and description of Chhoti Gumti, it is fair to conclude that the structure does not have sufficient architectural significance to be of national importance.

Figure 4: Chhoti Gumti in Green Park, New Delhi



Chhoti Gumti is around 600 years old and has local significance as it represents the Lodhi era. It clearly is not the best representation of Lodhi-era architecture. Therefore, it is only prudent to denotify such structures as MNI and transfer them to the respective states for their protection and upkeep.

1 (b) Movable antiquities treated as monuments of national importance

Many moveable antiquities such as canons, guns, jhoolas, statues etc. have been treated as MNI. Section 2 of AMASR Act, 1958 defines antiquities as follows:

(b) “antiquity” includes—

- (i) any coin, sculpture, manuscript, epigraph, or other work of art or craftsmanship,*
- (ii) any article, object or thing detached from a building or cave,*
- (iii) any article, object or thing illustrative of science, art, crafts, literature, religion, customs, morals or politics in bygone ages,*
- (iv) any article, object or thing of historical interest, and*
- (v) any article, object or thing declared by the Central Government, by notification in the Official Gazette, to be an antiquity for the purposes of this Act*

Though definitions of ‘monuments’, ‘sites’, and ‘antiquities’ are different, it is unclear how ‘antiquities’, especially standalone antiquities, are considered as ‘monuments’. Only in those cases when an antiquity is part of a larger monument it may be expedient to treat it as MNI to prevent it from being shifted from the original location.

Table 2: List of antiquities treated as monuments (some of these are a part of a larger monument and some are standalone antiquities)

State	District/Locality	Antiquities protected as Monument
Chhattisgarh	Bastar	Statute of Ganesh
Gujrat	Diu	Bangli
Karnataka	Bijapur	All old guns on ramparts and in trophy
	Kumta, Uttara Kannada	Figure of a tiger that is one meter in height and 50 cm in width
Uttar Pradesh	Mahoba	Five life sized elephant statues
	Jaunpur	Stone group of a gigantic lion standing on a small elephant on Akbar's bridge
West Bengal	Bankura	Dalmadal Gun and the platform on which it is mounted
	Murshidabad	Jahan Kosa Gun
Maharashtra	Sholapur	Mahadev stones
	Thane	Carved stones
	Palghar	Carved stones
Rajasthan	Bharatpur	Looted gun
	Bharatpur	Marble Jholla
	Bharatpur	Kaccha Bag
Assam	Sib Sagar	Eight Cannons of the Ahom period on the bank of the Sibsagar tank
	Sib Sagar, Joysagar	Idol of Siva
	Tin Sukhia	Gun of the Emperor Sher Shah
	Tin Sukhia, Sadia	Two Swivel guns belonging to the Mughal Nawwara, Sadia
	Sivasagar	Devidol
Tamil Nadu	Thanjavur	Big Cannon (Rajagopaol Cannon) in the first Rampart and the Bastions in Ts No. 608 of Ward iii
	Vellore	Cannon
	Pudukkottai	Stone idols of Ganesa and Anjaneya
	Pudukkottai	Vishnu idol
	Pudukkottai	Idols of Vishnu and Sridevi

Source: EAC-PM analysis

An example of a standalone antiquity considered as a monument of national importance is a small statue of a tiger in Kumta in Uttara Kannada district of Karnataka (see Figure 5). The stone sculpture of the tiger belongs to the 17th century. The sculpture is around one meter in length, 50 cm in width and 40 cm in thickness. The sculpture is not a part of a larger structure and is a standalone statue. The tiger is resting on its hind legs and trampling the ground with its front legs. Local people believe that this statue represents an animal spirit.

Figure 5: Statue of the tiger opposite to the English School in Kumta, Karnataka



Another example of antiquity protected as a monument is the 17th century forge-welded iron cannon that is mounted at Keela Alankam in Thanjavur, Tamil Nadu (see Figure 6).

Figure 6: 17th century forge-welded iron cannon in Thanjavur, Tamil Nadu



This cannon is 24 feet long and is said to be one of the largest in the world. As a standalone antiquity kept in the open, it is exposed to elements which makes conservation difficult. Since such antiquities are treated as monuments, the prohibited and regulated areas (100+200 meters) rules apply to them too. This again creates problems on the ground. Wherever feasible, museums are the best place for the preservation of antiquities that are located in the open.

1 (c) Untraceable monuments still being considered as monuments of national importance

The last category of selection errors relates to monuments that are untraceable. Of the 3695 monuments and sites of national importance, dozens of monuments are either ‘untraceable’, ‘affected due to urbanization’ or ‘submerged under reservoirs or dams.’ Even the monuments that have been ‘untraceable’ for decades now continue to be in the list of MNI.

Table 3: Monuments of national importance that are untraceable

Assam	
1	Guns of Emperor Sher Shah, Sadia, Tinsukia
Arunachal Pradesh	
2	The Ruins of Copper Temple, Paya, Lohit
West Bengal	
3	Ruins of fort, Bamanpukur, Nadia
Haryana	
4	Kos Minar, Mujesar, Faridabad
5	Kos Minar, Shahabad, Kurukshetra
Uttarakhand	
6	Kutumbhari Temple, Dwarahat, Almora
Delhi	
7	Bara Khamba Cemetery, Delhi
8	Inchla Wali Gumti, Mubarakpur Kotla
Madhya Pradesh	
9	Rock Inscription, Satna
Maharashtra	
10	Old European Tomb, Pune
11	One Buruj, Agarkot
Rajasthan	
12	Inscription in Fort, Nagar, Tonk
13	12 th Century Temple, Baran
Uttar Pradesh	
14	Ruins of three small linga temple circle 1000 AD, Ahugi, Mirzapur
15	Three sites with megaliths on the western and north eastern toes of the hill, Chandauli
16	Tablet on treasury building, Varanasi
17	Telia Nala Buddhist ruins, Varanasi
18	A Banyan grove containing traces of ancient building, Amavey, Ballia
19	Closed Cemetery, Katra Naka, Banda
20	Gunner Burkill's Tomb, Mehroni, Lalitpur
21	Three Tomb, Lucknow-Faizabad Road, Lucknow
22	Cemeteries at miles 6 and 7, Jahraila Road, Lucknow
23	Cemetery at Gaughat, Lucknow
24	Large ruined site called Sandi-Khera, Pali, Shahabad, Hardoi

Source: *Parliamentary Standing Committee Report on 'Issues Related to Untraceable Monuments and Protection of Monuments in India'*⁸

⁸ Rajya Sabha Secretariat. Department-related Parliamentary Standing Committee on Transport, Tourism and Culture, 124th Report. *Issues Related to Untraceable Monuments and Protection of Monuments in India*. (December, 2022).

According to the Performance Audit Report by the CAG (2013)⁹, ASI in 2006 had informed the Ministry of Culture and the Parliament that 35 MNI were not traceable. The same number was also communicated by the ASI to the CAG in 2012 during the performance audit.

For the purpose of the audit, CAG held joint inspections of 1655 (of the total 3695) monuments of national monuments with ASI. Out of the 1655 monuments and sites, around 92 monuments and sites were found to be “untraceable”. The actual number of untraceable monuments is likely to be higher since over 2000 monuments in the list were not inspected.

After the Performance Audit, ASI began to locate/identify the reportedly untraceable monuments and sites. By 2015, ASI could locate 42 monuments and sites that physically existed, 14 monuments and sites that were affected due to urbanisation (encroachment etc.) and 12 submerged under reservoirs and dams.

Nonetheless, ASI could not trace the remaining 24 monuments and sites and hence they have been considered ‘untraceable’. If a monument is untraceable for decades, it should be denotified from the list of monuments of national importance. Section 35 of AMASR Act, 1958 empowers the Central Government to denotify monuments.

While the above examples are of monuments that are untraceable, MNI are also threatened by encroachments. According to the information provided by the Minister of Culture to the Rajya Sabha on 22nd December 2022, out of 3695 MNI encroachments have been reported in 356 (approximately 10%) monuments. Uttar Pradesh (75), Tamil Nadu (74), Karnataka (48), Maharashtra (46) and Gujrat (35) have reported maximum encroachments.

Box 1: Curious case of an exported statue

John Nicholson (1821-1857) was a British brigadier general who was killed by Indian sepoys during the First War of Indian Independence in 1857 in Delhi. Nicholson played a crucial role in suppressing the First War of Indian Independence and the recapture of Delhi. He also played a critical role in defending the British Empire during the Anglo-Sikh wars.

In the early 1900s, the British erected a statue of Nicholson in Kashmiri Gate area in Delhi where he was fatally injured while fighting the Indian sepoys. The statue became a subject of controversy around 1957, the centenary year of the First War of Indian Independence. The statue of Nicholson was therefore removed from its original site in the Kashmiri Gate area and shifted to the Exhibition Grounds. Later, due to the efforts of Lord Brookeborough, the then Prime Minister of Northern Ireland, the statue was shipped to Nicholson’s birthplace County Tyrone in Northern Ireland in 1958. In 1960, Louis Mountbatten rededicated the statue of Nicholson in County Tyrone.

While rededicating the statue Mountbatten said that he “well remembered” the statue when it stood outside Delhi’s Kashmiri Gate¹⁰.

⁹ Comptroller and Auditor General of India. *Performance Audit of Preservation and Conservation of Monuments and Antiquities*, Report No.18 of 2013 (Performance Audit). The report can be accessed here: <https://cag.gov.in/en/audit-report/details/770>

¹⁰ *Ireland and India Nationalism, Empire and Memory*, Cambridge Imperial and Post-Colonial Studies Series. Michael Silvestri. Palgrave Macmillan, 2009.

The statue that once stood in front of Kashmiri Gate despite being shipped to another country still continues to be treated as a monument of national importance. Nicholson Cemetery in Kashmiri Gate, where Nicholson was buried is also a nationally protected monument. The cemetery bears Nicholson's name.

Multiple questions arise from the above case:

1. How did the statue of a British brigadier and an imperial hero come to be considered a monument of national importance?
2. AMASR Act, 1958 Act defines an “*ancient monument*” as “*any structure, erection or monument, or any tumulus or place of interment, or any cave, rock-sculpture, inscription or monolith, which is of historical, archaeological or artistic interest and which has been in existence for **not less than one hundred years**...*” (emphasis added). Therefore, how did the statue that was erected only around five decades ago at the time of the passing of the 1958 Act be considered as MNI? It did not even fulfil the criteria of completing 100 years at the time of notification.
3. How does a statue that was exported 66 years ago still continue to be included in the list of MNI?

2. Geographically Skewed Distribution of Monuments of National Importance

Though monuments of national importance are spread across the country, there is an imbalance in their geographical distribution. Over 60% of monuments of national importance in the country are located in just five states - Uttar Pradesh (743), Karnataka (506), Tamil Nadu (412), Madhya Pradesh (291) and Maharashtra (286). Historically significant states like Bihar (70), Odisha (80), Kerala (29) and Chhattisgarh (46) have disproportionately fewer monuments of national importance. Union territories of Andaman and Nicobar Islands and Lakshadweep do not have any MNI.

While the city of Delhi alone has 173 monuments of national importance, a large and culturally rich state like Telangana has only eight MNI. Though Delhi is rich and significant both culturally and historically, a large chunk of monuments in the city are not of ‘national importance’. Scores of monuments of regional importance and even minor monuments have been declared as monuments of national importance, as we saw earlier. This has also added to the issues of geographically skewed distribution.

Under the National Mission on Monuments and Antiquities (NMMA), ASI has identified and documented around 407 unprotected heritage monuments and sites in Telangana¹¹. Out of these 407 unprotected monuments, there might be some monuments and sites that might have national importance. Such monuments and sites should be brought under the jurisdiction of monuments of national importance.

¹¹ Information provided by the Minister of Culture in response to a parliamentary question in the Rajya Sabha on 22 December, 2022

Figure 7: State-wise list of monuments of national importance



Recommendations/proposals for protection of monuments and sites of national importance are generally initiated by the circle offices of ASI. It may also happen through VIP references. While some states have multiple circle offices (Karnataka has three), other states are clubbed under one circle office (states of Arunachal Pradesh, Assam, Nagaland and Meghalaya come under Guwahati circle). Not every circle office is equally proactive in recommending monuments and sites to be declared as MNI. It seems that the pace of identification and protection did not match the pace of expansion of ASI field offices across the country. In short, the process is arbitrary.

3. Inadequate and Geographically Skewed Expenditure on Upkeep of Monuments

ASI takes up repair works of monuments of national importance every year. While some monuments need minor repair works, some monuments demand major restoration works. Major restoration works are currently being undertaken in Sun temple in Konark, Jagannath temple in Puri and in Mahabalipuram.

Funds for conservation and maintenance work of MNI are allocated through the budget of the Government of India. Currently, the budgetary allocation and expenditure on protection and conservation of monuments of national importance are woefully inadequate. According to the information provided to the Lok Sabha in response to a parliamentary question in March 2021 (by the then minister of state [independent charge] for Culture and Tourism), ASI's expenditure for "conservation, preservation and environmental development" of monuments of national importance in 2019-20 (pre-Covid) was only INR 428 crores. This works out to a paltry sum of INR 11 lakhs per MNI.

Table 4: State-wise details of expenditure incurred for conservation, preservation and environmental development of monuments of national importance for the years 2018-19, 2019-20 and 2020-21

Sl. No	State/UT	Number of Monuments	Expenditure (in crores)		Allocation (till Jan- 2021, in crores)
			2018-19	2019-20	2020-21
1	Uttar Pradesh	745	16.98	15.95	22.35
2	Maharashtra	286	17.89	20.98	17.75
3	Karnataka	506	21.14	28.55	21.1
4	Madhya Pradesh	292	8.09	12.5	15
5	Odisha	80	5.9	5.3	2.75
6	West Bengal & Sikkim	139	9.68	8.1	6.71
7	Tamil Nadu & Puducherry	420	8.09	9.6	5.75
8	Punjab & Haryana	124	2.89	1.57	1
9	Himachal Pradesh	40	1.51	2.15	1.25
10	NCT Delhi	174	30.66	30.25	18.5
11	Goa	21	1.59	2.2	2.5
12	Assam	55	3.15	3.4	3
	Manipur	1			
	Meghalaya	8	0.83	1.00	1.5
	Mizoram	1			
	Nagaland	4			
	Tripura	8			
	Arunachal Pradesh	3			
13	Rajasthan	163	7.05	10.28	10
14	Andhra Pradesh & Telangana	137	3.7	5.35	3
15	Telangana	--	5.29	5.15	4
16	Bihar	70	1.75	1.45	1
17	Jammu & Kashmir	69	2.44	1.83	1.2
18	Kerala	28	2.27	4.5	2.52
19	Gujarat & Daman and Diu	215	9.61	7	7.75
20	Uttarakhand	42	0.82	3.58	3.5
21	Chhattisgarh	47	2.09	3	2.6
22	Jharkhand	13	0.86	1.6	1
	Chemical Preservation	--	5.17	3.34	3.36
	Horticultural Activity	--	45.62	38.1	38.5
	DG office	--	190.57	202.23	68.81
	Total		405.64	428.96	266.4

Source: Information provided in response to a parliamentary question in the Lok Sabha on 15 March, 2021

The problem of geographically skewed distribution of MNI as discussed in the earlier section is compounded by disproportionate allocation of funds for conservation and protection of monuments across states. For example, in 2020-21 Uttar Pradesh with 745 monuments of national importance was allocated INR 22.35 crores and Karnataka with 506 monuments was allocated 21.01 crores. In the same year, the city of Delhi with only 173 monuments was allocated INR 18.5 crores.

Similarly, in 2019-20 Uttar Pradesh was allocated INR 15 crores while Delhi was allocated 30.25 crores. This means that Uttar Pradesh with five times the number of MNI compared to Delhi received only half the budgetary allocation as compared to Delhi in 2019-20.

A separate problem relates to the treatment of revenue generated by MNI. Revenue collected from MNI through various sources like ticketing, photography, filming, parking, holding cultural events, etc. is not utilized either by the Ministry or by the ASI. The revenue amount is deposited in the Consolidated Fund of India (CFI). In 2018-19, Taj Mahal generated INR 81.95 crores revenue, Agra Fort INR 34.47 crores, Fatehpur Sikri INR 11.98 crores, Ajanta Caves INR 2.61 crores, Ellora Caves generated INR 6.39 crores revenue.

III. Lack of Information on Monuments of National Importance

A large number of monuments do not have information boards on site that provide basic information for the benefit of visitors and tourists. There are two categories of boards that are placed at monuments of national importance: (i) public notice boards and (ii) cultural notice boards.

Public notice boards are of two types. One type of public notice board provides information on AMASR Act, 1958 and summarises punitive actions for destroying or defaming the monument. The second type of public notice board mentions the prohibited and regulated area rules. Cultural notice boards provide details about the history and provenance of the monument along with its architectural and cultural significance.

According to the information provided by the Minister of Culture to the Lok Sabha on 8 August 2022 in response to a parliamentary question, only around a third of monuments of national importance have notice boards at their premises (see Table 5 below). Out of 3695 monuments, only around 1224 monuments have cultural notice boards.

Table 5: State-wise list of monuments of national importance with cultural notice boards outside the monument

State/Union Territory	Number of Monuments	Number of monuments with cultural notice boards
Andhra Pradesh	135	08
Arunachal Pradesh	03	01
Assam	55	19
Bihar	70	14
Chhattisgarh	46	06
Daman & Diu (U.T)	11	06
Goa	21	18
Gujarat	205	66
Haryana	91	33
Himachal Pradesh	40	21
Jammu & Kashmir (U.T)	56	28
Jharkhand	13	05
Karnataka	506	201
Kerala	29	26
Ladakh (U.T)	15	04
Madhya Pradesh	291	170
Maharashtra	286	35
Manipur	01	01
Meghalaya	08	Information not available
Mizoram	01	01
Nagaland	04	01
N.C.T. Delhi	173	30
Odisha	80	15
Puducherry (U.T)	07	06
Punjab	33	04

State/Union Territory	Number of Monuments	Number of monuments with cultural notice boards
Rajasthan	163	62
Sikkim	03	03
Telangana	08	06
Tamil Nadu	412	164
Tripura	08	06
Uttar Pradesh	743	112
Uttarakhand	43	33
West Bengal	135	119
Total	3695	1224

Source: Information provided to a parliamentary question in the Lok Sabha on 8 August, 2022

An example of the absence of a cultural notice board can be observed at Lakshminarasimha temple in Nuggehalli village, Hassan district, Karnataka. This Hoysala period temple, built in 1246, is known for its sculptural beauty and architectural significance. At the entrance of the temple, there are two public notice boards placed next to each other (see Figures 8 & 9). One public notice board mentions that the temple has been declared as a monument of national importance under AMASR Act, 1958 and describes the punitive actions for defacing the monument. The second board mentions the 'prohibited' and 'restricted' area rules under AMASR Act, 1958. There is no cultural notice board at the temple that provides even basic information about the temple for the benefit of visitors and tourists.

Figures 8 & 9: Public notice boards at Lakshminarasimha temple in Nuggehalli, Karnataka

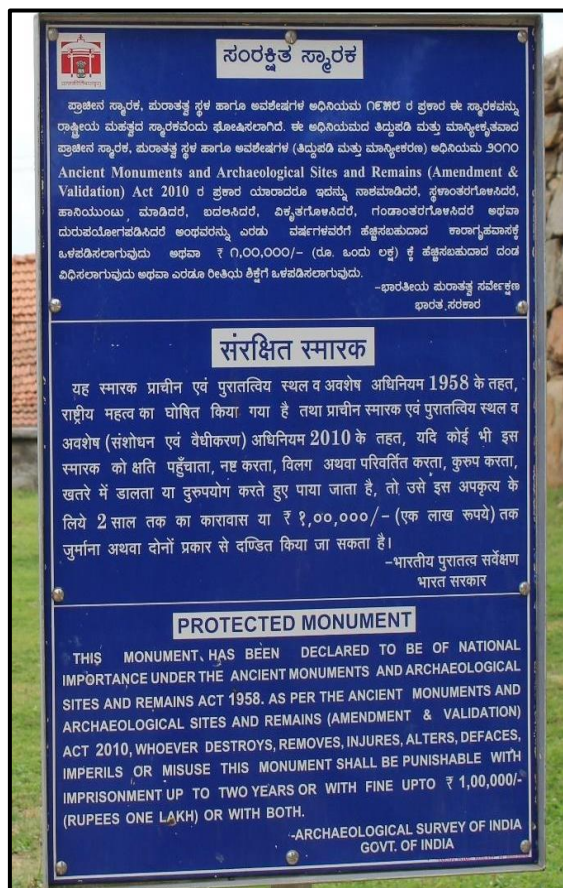


Figure 10: An example of a cultural board (Qutub Minar, Delhi)

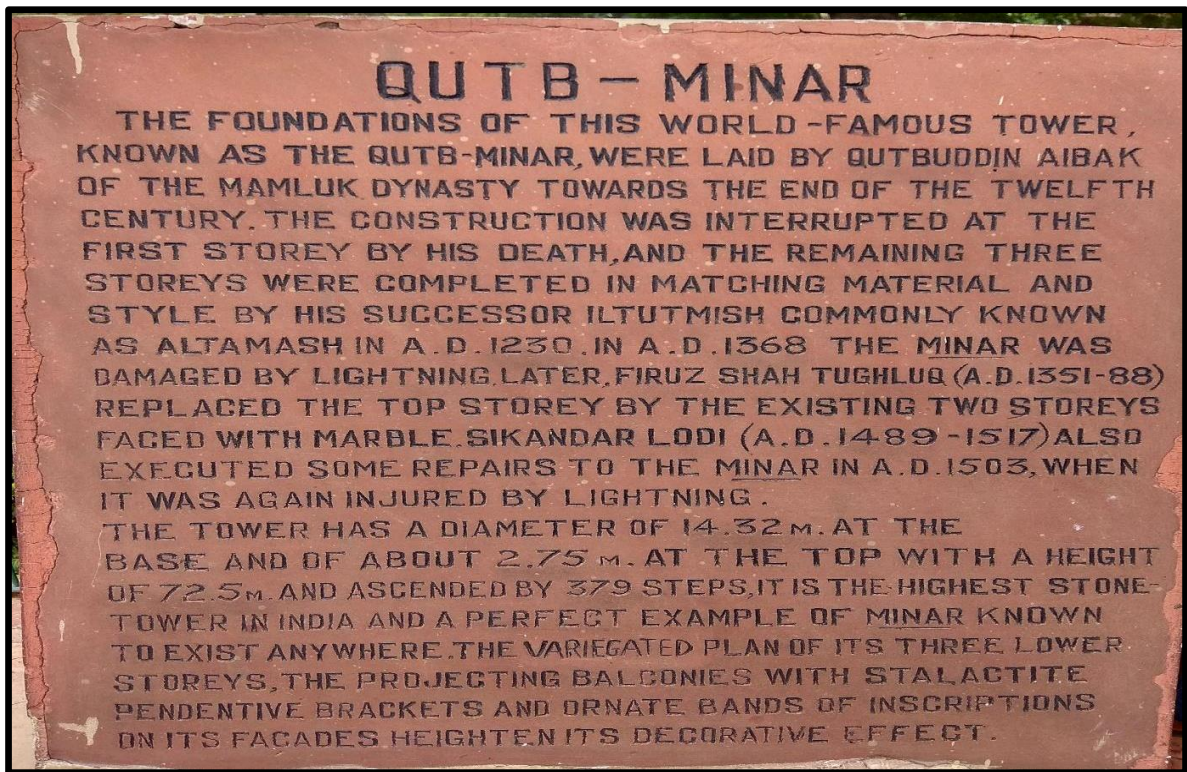


Figure 10 is the cultural notice board at Qutub Minar in Delhi. It has information on the history and the architectural significance of the monument. Similar cultural notice boards should be placed outside all MNI.

IV. What is the Source for the Present Skewed and Unwieldy List?

An overwhelming majority of the present list of MNI were identified as such before 1947 under colonial-era laws. Surprisingly, no attempt was made to reconsider the list under the 1951 or 1958 Acts post-independence. Instead, 2584 monuments identified by the British were adopted *in toto* and they continue to represent around two-thirds of MNI today.

One of the first laws that provided a legal framework for preservation of ancient monuments and of objects of archaeological, historical, or artistic interest was the Ancient Monuments Preservation Act, 1904. The Act provided for the preservation of ancient monuments and of objects of archaeological, historical, or artistic interest. Executive authority under this Act was vested under local governments. When the Government of India Act, 1935 was enacted, the expression 'Local Government' was changed into 'Central Government', thus vesting the executive authority of protecting the historical monuments and archaeological sites in the Central Government.

Between 1904 and 1947, there were 2584 monuments and sites protected under the 1904 Act. Between 1947 and 1951 another 104 monuments were included for protection. In 1951 the Ancient and Historical Monuments and Archaeological Sites and Remains (Declaration of National Importance) Act, 1951 was enacted. This Act declared "certain ancient and historical monuments and archaeological sites and remains" to be of "national importance." It was the 1951 Act that mentioned the term "national importance" for the first time. At the time of being passed, the 1951 Act declared 444 ancient and historical monuments and archaeological sites and remains to be of national importance. These were from the princely states of Madhya Bharata, Mysore, Travancore-Cochin, Hyderabad, Saurashtra, Rajasthan and Patiala & East Punjab states. Apart from these 444 monuments from the princely states, 22 other monuments were also added to the list.

The 1951 Act was amended a few times between 1952 and 1958 to add more historical monuments and archaeological sites and remains to the list. Between these years, 166 monuments were added to the list (therefore, between 1947 to 1958 there were 736 monuments added to the list). List of monuments and sites declared to be of national importance as per the 1951 Act is given in Annexure D.

In 1958, the Ancient Monuments and Archaeological Sites and Remains (AMASR) Act, 1958 was enacted to provide for the preservation of ancient and historical monuments and archaeological sites and remains of national importance. Under AMASR Act, 1958 all the 2584 monuments protected prior to 1947 under the 1904 Act were shifted *en masse* to the list of monuments of national importance. The 736 historical monuments and archaeological sites that were protected between 1947 and 1958 were also *en masse* shifted under AMASR Act, 1958. This meant that the 1958 Act declared all the 3320 monuments that were protected till 1958 to be of national importance without review or scrutiny.

This illustrates that even the basic level of due diligence was not followed for the identification and selection of monuments to be of national importance under AMASR Act, 1958. Therefore, the current list includes scores of monuments and sites that may not have national significance, historical or cultural importance. Though it has been six decades since the

passage of AMASR Act, 1958, to date the list of monuments of national importance has not been subjected to any serious review or scrutiny. This is one of the important reasons for the present skewed and unwieldy list.

Table 6: Year and number of monuments and sites brought under central protection

Year	No. of Monuments Brought Under Central Protection	Year	No. of Monuments Brought Under Central Protection	Year	No. of Monuments Brought Under Central Protection
Before 1947	2584	1972	1	1998	2
1947	22	1973	0	1999	2
1948	61	1974	1	2000	2
1949	16	1975	2	2001	0
1950	5	1976	7	2002	5
1951	466	1977	2	2003	28
1952	55	1978	0	2004	18
1953	6	1979	2	2005	8
1954	52	1980	0	2006	0
1955	1	1981	4	2007	11
1956	16	1982	14	2008	2
1957	1	1983	8	2009	0
1958	35	1984	12	2010	1
1959	1	1985	5	2011	2
1960	1	1986	6	2012	1
1961	6	1987	5	2013	0
1962	7	1988	19	2014	8
1963	23	1989	8	2015	1
1964	44	1990	4	2016	0
1965	18	1991	1	2017	0
1966	17	1992	5	2018	9
1967	7	1993	1	2019	4
1968	19	1994	0	2020	2
1969	1	1995	3	2021	2
1970	1	1996	10	Total	3695
1971	0	1997	2		

V. Sources of Other Problems

Section 4 of the AMASR Act, 1958 entails the power of the Central Government to declare ancient monuments, etc., to be of national importance. It only broadly lays out the process of declaring a monument or a site as nationally protected monument. The section reads as follows:

(1) Where the Central Government is of opinion that any ancient monument or archaeological site and remains not included in section 3 is of national importance, it may, by notification in the Official Gazette, give two months' notice of its intention to declare such ancient monument or archaeological site and remains to be of national importance; and a copy of every such notification shall be affixed in a conspicuous place near the monument or site and remains, as the case may be.

(2) Any person interested in any such ancient monument or archaeological site and remains may, within two months after the issue of the notification, object to the declaration of the monument, or the archaeological site and remains, to be of national importance.

(3) On the expiry of the said period of two months, the Central Government may, after considering the objections, if any, received by it, declare by notification in the Official Gazette, the ancient monument or the archaeological site and remains, as the case may be, to be of national importance.

(4) A notification published under sub-section (3) shall, unless and until it is withdrawn, be conclusive evidence of the fact that the ancient monument or the archaeological site and remains to which it relates is of national importance for the purposes of this Act.

It is clear from the above provision that it is this 'notification' that gives monuments or sites the official status of a nationally protected monument. However, ASI does not have a detailed procedure for declaring monuments to be of national importance. Recommendations for monuments and sites to be declared as monuments of national importance happen at the initiative of the circle offices of ASI or VIP references. However, there are no clear guidelines for what constitutes "national importance".

ASI has a Standard Operating Procedure (SoP) for the protection of monuments. According to the SoP, proposals for protection are received from the circle offices of ASI through Form-B (sample copies of the SoP and Form B are given in Annexures E & F). The Technical Evaluation Committee examines proposals from the circle offices and sends it to the assessment of DG, ASI. The recommended proposals are then forwarded for the approval of the Minister of Culture, Government of India. Once it is approved by the Minister's office, a preliminary draft of the notification is prepared for publication in the Gazette of India. Objections and comments are invited for a period of two months. Copies of the draft notification are circulated among various stakeholders and put up at the location of the monument/site for the knowledge of the local people. After completion of two months from the date of publishing of notification, objections received are examined and resolved. After this, the final notification is published and the ASI takes control of the monument for protection.

According to CAG's 'Performance Audit of Preservation of Monuments and Antiquities' (Report No. 18 of 2013) the Committee had held only four meetings between 2006-2012 for scrutinising the proposals of monuments of national importance that were received from the circle offices of ASI. Out of the 78 proposals submitted by various Circles since 1996 (till 2012) for the protection of monuments, only 53 were submitted to the Committee for consideration. EAC-PM had sought information on the number of meetings the Committee held between 2013-2022 for scrutinising the proposals. However, the number is not clear.

On the other hand, Form B filled for the assessment of monuments and sites suggested for protection is at most a procedural formality as it does not lay clear criteria for the selection of monuments to be of national importance. Form B does not seek detailed information on why the monument or a site needs to be considered for protection. The Form has one section for "brief history" of the monument. Other information sought in Form B include ownership details and other procedural information. Finally, there seems to be no comprehensive survey carried out by ASI for identifying monuments to be included in the list of monuments of national importance on a periodic basis.

In comparison, the Operational Guidelines of UNESCO has clearly laid out detailed multi-layered procedures and a set of criteria for designating any monument or a site as a World Heritage Site (see Box 2 and 3). Operational Guidelines has been prepared for this specific purpose only and has provision for periodic monitoring and assessment of monuments and sites that have been declared as World Heritage Sites.

Box 2: Criteria used for the UNESCO World Heritage Sites list¹²

To be included in the UNESCO World Heritage Sites list, monuments or sites must be of Outstanding Universal Value (OUV) and meet at least one out of ten selection criteria clearly laid out in the Operational Guidelines. The first six guidelines pertain to cultural heritage and the rest pertain to natural heritage. The criteria are as follows:

1. To represent a masterpiece of human creative genius;
2. To exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;
3. To bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;
4. To be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;
5. To be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change;

¹² UNESCO World Heritage Convention, the Criteria for Selection: <https://whc.unesco.org/en/criteria/>

6. To be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance. (The Committee considers that this criterion should preferably be used in conjunction with other criteria);
7. To contain superlative natural phenomena or areas of exceptional natural beauty and aesthetic importance;
8. To be outstanding examples representing major stages of earth's history, including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features;
9. To be outstanding examples representing significant on-going ecological and biological processes in the evolution and development of terrestrial, fresh water, coastal and marine ecosystems and communities of plants and animals;
10. To contain the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation.

Box 3: Procedure for inclusion in the UNESCO World Heritage Sites list¹³

As per UNESCO's Operational Guidelines, the process of identifying the heritage sites is based on their Outstanding Universal Value (OUV). Proposals received are assessed on the basis of justification provided for OUV, criteria and statements of authenticity, integrity and, in comparison with other similar properties. Based on these assessments, proposals are forwarded to the World Heritage Centre for inclusion in the Tentative List of UNESCO.

Tentative List: The first step a country must take is to make an 'inventory' of its important natural and cultural heritage sites located within its boundaries. This inventory is known as the 'Tentative List' and provides a forecast of the properties a country may decide to submit for inscription in the next five to ten years. The World Heritage Committee does not consider a nomination for inscription to the World Heritage Sites list unless the property has already been included on the Tentative List.

Final Nomination: By preparing a Tentative List and selecting sites from it, countries can proceed to nominate properties to be included in the World Heritage Sites list. The nomination is submitted to the World Heritage Centre for review which in-turn sends it to the appropriate advisory bodies for evaluation. The nominated property is independently evaluated by two advisory bodies mandated by the World Heritage Convention: the International Council on Monuments and Sites (ICOMOS) and the International Union for Conservation of Nature (IUCN), which respectively provide the World Heritage Committee with their evaluations. Once a site has been nominated and evaluated, the World Heritage Committee, which meets once a year, makes the final decision on inscription of monuments and sites to the World Heritage Sites list.

¹³ UNESCO World Heritage Convention, World Heritage List Nominations:
<https://whc.unesco.org/en/nominations/>

Apart from this, a new development was the formation of the National Monuments of Authority (NMA) in 2010 by the way of an amendment to the AMASR Act, 1958. One of the most important functions assigned to the NMA was the management of prohibited and regulated areas around monuments. The NMA grants permissions to applicants for construction related activities in prohibited and regulated areas. While ASI is responsible for the protection of monuments, NMA was given the responsibility of the surrounding areas.

The Act also mandated NMA to prepare bye-laws for all the 3695 monuments of national importance. However, in the past 11 years, NMA has framed bye-laws for only 126 MNI, most of which are awaiting the nod of ASI. So far, by-laws of only seven monuments have been laid in Parliament so far. However, full-time members to NMA have not been appointed since 2018-19 and there are only two part-time members currently serving. There also seems to be a lack of coordination between the two agencies. This artificial separation of responsibilities between ASI (maintenance of MNIs) and NMA (development of surrounding area) seems to not have worked.

VI. Recommendations

1. ASI should review and rationalise the existing list of monuments of national importance based on parameters like architectural significance and historical and cultural importance at the national level. For this, the term 'national importance' has to be clearly defined.

To achieve this, ASI should come up with clear criteria and multi-layered procedures for declaring a monument to be of national importance. These can be on the lines of the Operational Guidelines of UNESCO which has laid out detailed, multi-layered procedures and a set of criteria for designating any monument or a site as a World Heritage Site (see Box 2 and 3). The procedure followed by ASI seems to be quite arbitrary and is not substantive and comprehensive enough.

At the same time, the lists of protected monuments should be updated and reconciled periodically so that there is no ambiguity with regard to the number of protected monuments under ASI or their encroachment details. ASI should make provisions for periodical inspection of each protected monument for which it should prescribe detailed guidelines. Status reports, including photographic evidence, of all the protected monuments based on the inspection should be prepared and regularly updated. These changes can be done through executive orders.

2. ASI should publish a book of notifications with detailed information about the provenance of monuments of national importance which includes the following details:

- Notification number and the date of inclusion under monuments of national importance
- Locality (along with latitude, longitude, site map and topographical features)
- Brief History and complete description of the monuments
- Current status and photographs
- Ownership details and details of the administrative control/restrictions
- Published references about the monuments

This information should be published on ASI website and on-location notice boards.

3. Monuments which have local importance and not national importance per se should be transferred to the respective states for protection. All the states should be encouraged to have their own specialised institutions for monument protection, archaeology research & excavations like NMA and ASI at the central level. States like Karnataka, Tamil Nadu and Assam have them. This will also help in transferring monuments to states. There are 4506 monuments and sites that are protected at the state level by the respective states (See Annexure A). For this, no change in AMASR Act, 1958 is needed as it can also be done through an executive order.

4. As far as possible, all the standalone antiquities like cannons and statues should be denotified from the list of monuments of national importance. They can be protected as antiquities. Many of these antiquities are located in the open making it difficult to conserve them. Therefore, for better protection they may be shifted to museums or other safer locations nearby wherever possible.

Section 25 of AMASR Act, 1958 empowers the Central Government, especially the Director General of ASI, with the control of moving antiquities. The Section reads as follows:

25. Power of Central Government to control moving of antiquities—

(1) If the Central Government considers that any antiquities or class of antiquities ought not to be moved from the place where they are without the sanction of the Central Government, the Central Government may, by notification in the Official Gazette, direct that any such antiquity or any class of such antiquities shall not be moved except with the written permission of the Director-General.

5. Missing and minor monuments should be denotified from the list of monuments of national importance. According to Section 35 of AMASR Act, 1958, the Central Government can denotify monuments of national importance if the monument ceases to be of national importance. Section 35 of the Act reads as follows:

Ancient monuments, etc., which have ceased to be of national importance.— If the Central Government is of opinion that any ancient and historical monument or archaeological site and remains declared to be of national importance by or under this Act has ceased to be of national importance, it may, by notification in the Official Gazette, declare that the ancient and historical monument or archaeological site and remains, as the case may be, has ceased to be of national importance for the purposes of this Act.

The Ancient Monuments Preservation Act, 1904 did not have any provision for denotifying monuments. Provision for denotifying monuments was first provided in AMASR Act, 1958. Hence, no monument was denotified between 1904 and 1958. After the enactment of AMASR Act, 1958 around 170 monuments and sites were denotified by ASI in the first 20 years of enactment of AMASR Act, 1958. Denotifications took place mainly in the following years: 1962, 1963, 1964, 1965, 1966, 1967, 1968, 1971, 1972 and 1978. However, there has not been any denotification of monuments since 1978.

6. An attempt should be made to restore geographical balance in the location of monuments of national importance. New monuments should be added to the list based on well-defined criteria and clearly laid procedures. For this, ASI should conduct a proper survey of unprotected monuments that can be included in the list.

7. India spends woefully little amount on the protection and upkeep of monuments. It approximately amounts to INR 11 lakhs per MNI (INR 428 crores for 3695 monuments in 2019-20) which is too little for a culturally rich and civilizational state like India. Therefore, there is an urgent need to exponentially increase the allocation of funds for protection and upkeep of monuments. Allocation should be based on the importance of the monument and due assessment of conservation works required.

ASI should identify revenue streams such as tickets, events, fees and other sources in more monuments. In 2018-19, Taj Mahal generated INR 81.95 crores, Agra Fort generated INR 34.47 crores, Fatehpur Sikri INR 11.98 crores, Ajanta Caves INR 2.61 crores, Ellora Caves INR 6.39 crores and Elephanta Caves generated INR 6.39 crores in revenue. However, entry fee collected in monuments, which amounted to around INR 130 crores (in 2018-19), is credited

to the Consolidated Fund of India (CFI). This means ASI does not get the revenue generated through monuments under its jurisdiction. Entry fee at monuments of national importance should be retained at ASI. Every effort should be made to increase this income as this amount is very low compared to what other countries earn from monuments.

8. Government has up National Culture Fund (NCF) as a Trust in 1996 under the Charitable Endowment Act, 1890 with a view to mobilise extra resources through public-private partnerships for promoting, protecting and preserving India's cultural heritage, including the contribution of Corporate Social Responsibility (CSR). Since its inception, NCF has completed 52 projects with various donors. ASI and the Ministry of Culture along with the Ministry of Tourism should proactively get more donors, both individual and institutional, for conservation of monuments. NCF has completed 52 projects major and minor projects in the past 26 years, averaging just two projects per year. This number should increase.

9. Separation of responsibilities between ASI (maintenance of monuments) and NMA (development of surrounding area) seems to not have worked. It is advisable to merge the responsibilities for protecting the monument and management of surrounding areas and give it to one autonomous institution (for example, NMA) under the aegis of ASI. The main ASI should focus only on archaeology research, excavation, restorations and maintenance of museums.

Annexures

Annexure A: Number of monuments protected at state-level by the respective states

Sl. No.	State/ U. T.	No. of Protected Monuments
1	Andaman and Nicobar Island (U. T.)	-
2	Andhra Pradesh	280
3	Arunachal Pradesh	8
4	Assam	126
5	Bihar	54
6	Chhattisgarh	58
7	Daman & Diu and Dadra & Nagar Haveli (U.T.)	-
8	Goa	51
9	Gujarat	317
10	Haryana	39
11	Himachal Pradesh	8
12	Jammu & Kashmir (U.T.)	55
13	Jharkhand	3
14	Karnataka	799
15	Kerala	183
16	Ladakh (U.T.)	2
17	Lakshadweep (U.T.)	-
18	Madhya Pradesh	526
19	Maharashtra	376
20	Manipur	63
21	Meghalaya	4
22	Mizoram	81
23	Nagaland	-
24	N.C.T. Delhi	19
25	Odisha	214
26	Puducherry (U.T.)	-
27	Punjab	94
28	Rajasthan	385
29	Sikkim	-
30	Telangana	346
31	Tamil Nadu	96
32	Tripura	2
33	Uttar Pradesh	161
34	Uttarakhand	47
35	West Bengal	109
	Total	4506

Annexure B: List of British graves/cemeteries treated as monuments of national importance

The following is the list of 75 graves/cemeteries related to British soldiers declared as monuments of national importance. These are spread across nine states - Haryana, Gujarat, Nagaland, Uttarakhand, Tamil Nadu, West Bengal, Assam, NCT Delhi and Uttar Pradesh.

Sl.No	British Graves/Cemeteries	Locality	District
Haryana			
1	Cantonment northern cemetery close to the Cantonment church tower	Karnal	Karnal
Gujarat			
1	English Tombs	Katargam	Surat
Nagaland			
1	Lt. H. Forbe's Grave	Suchima	Kohima
Uttarakhand			
1	Old Cemetery at Roorkee	Roorkee	Haridwar
Tamil Nadu			
1	Tomb of David Yake and Joseph Hymners near Law College	Muthialpet	Chennai
Assam			
1	Grave of Lieutenant Lewis	Darang	Biswanath
2	Grave of Lieutenant Thomas Kennedy	Darang	Biswanath
3	Tomb of Lieutenant Cresswell	Goalpara	Goalpara
4	Monument over the grave of Mr. B.J. Stow	Goalpara	Goalpara
NCT of Delhi			
1	Enclosure containing the grave of Lt. Edwards and other, Murdered in 1857	Northern Ridge	North Delhi
2	Lothian Road Cemetery	Kashmeri Gate	North Delhi
3	Nicholson (or Kashmeri Gate) Cemetery	Kashmeri Gate	North Delhi
4	Rajpur (Mutiny Cemetery)	Old Rajpur Cantonment	North Delhi
5	Tomb of Capt. Mac. Barnatt & others who fall in an attack on Kishanganj	Kishanganj	North Delhi
Uttar Pradesh			
1	Roman Catholic Cemetery with its tombs, boundary walls, gateways and gardens	Lashkarpur and Sadi-Ka- Nagla, Sadar	Agra
2	Cemetery of Nawab Najib-ud-Daula	Najibabad	Bijnor
3	Two Cemeteries (One near the Police line and the other near the Victoria memorials)	Bulandshahr	Bulandshahr
4	Closed cemetery (at Fort)	Fatehgarh	Farrukhabad
5	Closed cemetery (at all Souls Memorial Church)	Fatehgarh	Farrukhabad
6	Closed cemetery (at British Infantry lines)	Fatehgarh	Farrukhabad
7	Closed Cemetery	Mainpuri	Mainpuri
8	Cemetery	Meerut	Meerut
9	Cemetery on the Meerut Race Course	Meerut	Meerut
10	Tombs of the Sardhana Cemetery	Sardhana	Meerut
11	Khera ki Bani, Old Cemetery	Lodhipur	Saharanpur

Sl.No	British Graves/Cemeteries	Locality	District
12	Old British Cemetery, Saharanpur	Saharanpur	Saharanpur
13	Old British Cemetery	Daranagar	Bijnor
14	Closed Cemetery, Katra Naka	Banda	Banda
15	Closed Cemetery	Mau	Chitrakut
16.	City Cemetery	Karvi	Chitrakut
17	Manikpur Cantonment Cemetery	Manikpur	Chitrakut
18	Closed British Cemetery	Kaitha	Hamirpur
19	Major Robert's Tomb	Bilgram	Hardoi
20	Memorial tomb	Sawajapur	Hardoi
21	Memorial Cemetery	Bilgram	Hardoi
22	Cemetery	Jalaun	Jalaun
23	Closed Cemetery	Kalpi	Jalaun
24.	Cemetery	Konch	Jalaun
25	Memorial Cemetery, south of fort of Phuta Darwaza Road	Jhansi	Jhansi
26	Monument of Major F.W. Pinkney, near the premises of Messers Eduljee Boyce & Co	Jhansi	Jhansi
27	Iona Cross Garden	Kanpur	Kanpur
28	Katchery Cemetery	Kanpur	Kanpur
29	Subedar-ka-Talab Cemetery	Kanpur	Kanpur
30	British Monuments	Aurangabad	Lakhimpur Kheri
31	Gunner Burkill's Tomb	Mehroni	Lalitpur
32	Two Cemeteries	Lucknow	Lucknow
33	Cemetery at Marion	Lucknow	Lucknow
34	Cemetery	Lucknow	Lucknow
35	Cemeteries	Lucknow	Lucknow
36	Two Cemeteries on La-Martiniere Road	Lucknow	Lucknow
37	Cemetery at Vilayati Bagh	Lucknow	Lucknow
38	Cemetery in Raja Incha Singh's Compound	Lucknow	Lucknow
39	Kalan-ki-Lat and adjoining Cemetery	Lucknow	Lucknow
40	Sapper's Tomb	Lucknow	Lucknow
41	Cemetery on Cawnpore Road	Bakhshika Talab	Lucknow
42	Cemeteries on Jahraila road	Lucknow	Lucknow
43	British Cemetery on Sapru Marg	Lucknow	Lucknow
44	Cemetery at Alambagh	Lucknow	Lucknow
45	Cemetery in Dilkusha	Lucknow	Lucknow
46.	Cemetery at Gaughat	Lucknow	Lucknow
47	Cemeteries near Kaiser Pasand	Lucknow	Lucknow
48	Cemetery near Fort Machhi Bhawan	Lucknow	Lucknow
49	British Cemetery	Chunar	Mirzapur
50	British Cemetery	Mirzapur	Mirzapur
51	British Cemetery	Sultanpur	Mirzapur
52	British Cemetery	Gopiganj	Sant Ravidas Nagar
53	Grave of European Officers	Shivala	Varanasi
54	Lt. Col. Pogson's tomb	Shivala	Varanasi

Sl.No	British Graves/Cemeteries	Locality	District
55	Two graves	Old Artillery lines	Varanasi
56	Cemetery	Chaitganj	Varanasi
57	Closed cemetery	Rajghat	Varanasi
58	Old British Cemetery	Azamgarh	Azamgarh
59	Cemeteries at Kydgnj	Allahabad	Allahabad
West Bengal			
Sl No	Grave of British Soldier	Locality	District
1	Residency Cemetery also known as Station Burial ground	Baharampur	Murshidabad
2	Tomb of General Liyod	Darjeeling	Darjeeling

Annexure C: Kos Minars declared as monuments of national importance

The following is the list of 109 Kos Minars treated as monuments of national importance. These Kos Minars are located in Delhi, Rajasthan, Punjab, Uttar Pradesh, and Haryana.

Kos Minar in Delhi

Sl.	Kos Minar	Locality	District
Delhi			
1	Kos Minar or Mughal Mile Stone	Between Purana Qila and Azim Ganj (Zoo)	New Delhi
Rajasthan			
1	Kos Minar erected by Emperor Akbar	Ajmer-Jaipur Road	Ajmer
2	Kos Minar erected by Emperor Akbar	Ajmer-Jaipur Road	Ajmer
3	Kos Minar erected by Emperor Akbar	Chatri	Ajmer
4	Kos Minar erected by Emperor Akbar	Ghugra	Ajmer
5	Kos Minar erected by Emperor Akbar	Hushiara	Ajmer
6	Kos Minar erected by Emperor Akbar	Hushiara	Ajmer
7	Kos Minar erected by Emperor Akbar	Kair	Ajmer
8	Kos Minar erected by Emperor Akbar	Khanpura/Kayampura	Ajmer
Punjab			
1	Seven Kos Minars on old Badshahi highway from Delhi to Lahore	Birpind	Jalandhar
2	Seven Kos Minars on old Badshahi highway from Delhi to Lahore	Chima Kalan	Jalandhar
3	Seven Kos Minars on old Badshahi highway from Delhi to Lahore	Dakhni Jahangir	Jalandhar
4	Mughal Kos Minar, Three Miles of north-west of Dakhni Sarai	Dakhni Khanpur Dhadha	Jalandhar
5	Seven Kos Minars on old Badshahi highway from Delhi to Lahore	Nakodar	Jalandhar
6	Seven Kos Minars on old Badshahi highway from Delhi to Lahore	Shampur	Jalandhar
7	Seven Kos Minars on old Badshahi highway from Delhi to Lahore	Tut Kalan	Jalandhar
8	Seven Kos Minars on old Badshahi highway from Delhi to Lahore	Upal	Jalandhar
9	Kos Minar about three miles east of Ludhiana <i>[Missing]</i>	Dhandari Kalan	Ludhiana
10	Kos Minar near the village of Ghungrali Rajputan	Ghungrali Rajputan	Ludhiana
11	Kos Minar near the Sarai of Lashkari Khan	Laskari Khan	Ludhiana
12	Kos Minar about one mile east of Ludhiana	Sherpur Kalan	Ludhiana
13	Kos Minar near the village of Sunnahwal	Sunnahwal	Ludhiana
Uttar Pradesh			
1	Kos Minar	Agra-Fatehpur Sikri Road, Mile 09	Agra
2	Kos Minar	Agra-Fatehpur Sikri Road, Mile 11	Agra

Sl.	Kos Minar	Locality	District
3	Kos Minar	Agra-Fatehpur Sikri Road, Mile 12	Agra
4	Kos Minar	Agra-Fatehpur Sikri Road, Mile 15	Agra
5	Kos Minar	Agra-Fatehpur Sikri Road, Mile 04	Agra
6	Kos Minar	Agra-Mathura Road, Mile 06	Agra
7	Kos Minar	Agra-Mathura Road, Mile 09	Agra
8	Kos Minar	Agra-Mathura Road, Mile 12	Agra
9	Kos Minar	Chhatta, Mile 19	Mathura
10	Kos Minar	Chhatta, Mile 24	Mathura
11	Kos Minar	Chhatta, Mile 26	Mathura
12	Kos Minar	Chhatta, Mile 29	Mathura
13	Kos Minar	Gohari	Mathura
14	Kos Minar (Circular Road)	Mathura	Mathura
15	Kos Minar, Mile 3	Mathura-Delhi road	Mathura
16	Kos Minar, Mile 11, Furlong 5 (west of Chamah village)	Mathura-Delhi road	Mathura
17	Kos Minar, opposite to mile 13	Mathura-Delhi road	Mathura
18	Kos Minar, Mile 116	Mathura-Delhi road	Mathura
19	Kos Minar in the beginning of Dig road	Mathura-Dig road	Mathura
20	Kos Minar in field no.127	Bhagautipur	Auraiya
21	Kos Minar in field no.194/1/ (191/1)	Jarhulia	Auraiya
22	Kos Minar in field no. 215-1	Paighambarpur	Auraiya
23	Kos Minar in field no.684 and 685	Salempur, Panhar	Auraiya
24	Kos Minar	Khalaspur	Kanpur
25	Kos Minar	Bhognipur	Kanpur Dehat
26	Kos Minar	Bhognipur	Kanpur Dehat
27	Kos Minar	Chaparghata	Kanpur Dehat
28	Kos Minar	Deosar	Kanpur Dehat
29	Kos Minar	Gour	Kanpur Dehat
30	Kos Minar	Gour	Kanpur Dehat
31	Kos Minar	Halia	Kanpur Dehat
32	Kos Minar	Jallapur Sikandara	Kanpur Dehat
33	Kos Minar	Pailwaru	Kanpur Dehat
34	Kos Minar	Pitampur	Kanpur Dehat
35	Kos Minar	Raigawan	Kanpur Dehat
36	Kos Minar	Rajpur	Kanpur Dehat
37	Kos Minar	Sankhiln Buzurg	Kanpur Dehat
38	Kos Minar	Sardarpur	Kanpur Dehat
Haryana			
1	Kos Minar No. 10	Khawaza Sarai	Faridabad

Sl.	Kos Minar	Locality	District
2	Kos Minar No. 13 <i>[Missing]</i>	Mujessar	Faridabad
3	Kos Minar No. 11	Village Mawai (Sec 29, Faridabad)	Faridabad
4	Kos Minar	Bhenikalan	Karnal
5	Kos Minar	Daha	Karnal
6	Kos Minar (North)	Gharaunda	Karnal
7	Kos Minar (South)	Gharaunda	Karnal
8	Kos Minar (Namaste Chowk)	Karnal	Karnal
9	Kos Minar (City)	Karnal	Karnal
10	Kos Minar	Kohand	Karnal
11	Kos Minar	Kutail	Karnal
12	Kos Minar (North)	Taraori	Karnal
13	Kos Minar (South)	Taraori	Karnal
14	Kos Minar	Adhor	Kurukshetra
15	Kos Minar	Amin	Kurukshetra
16	Kos Minar	Bhiwani Khera	Kurukshetra
17	Kos Minar	Darakalan (Thanesar)	Kurukshetra
18	Kos Minar	Fatuhpur	Kurukshetra
19	Kos Minar	Mohri	Kurukshetra
20	Kos Minar	Sarai Sukh	Kurukshetra
21	Kos Minar <i>[Missing]</i>	Shahabad	Kurukshetra
22	Kos Minar	Zainpura	Kurukshetra
23	Kos Minar No. 18	Alapur	Palwal
24	Kos Minar NO. 22	Aurangabad	Palwal
25	Kos Minar, No. 24	Banchchari	Palwal
26	Kos Minar No. 25	Banchchari	Palwal
27	Kos Minar No. 27	Bhulwana	Palwal
28	Kos Minar No. 16	Gudhpuri	Palwal
29	Kos Minar No. 17	Gudhpuri	Palwal
30	Kos Minar No. 26	Hodal	Palwal
31	Kos Minar No. 23	Khateila	Palwal
32	Kos Minar No. 21	Khera Sarai	Palwal
33	Kos Minar No. 20	Khusropur	Palwal
34	Kos Minar No. 19	Palwal	Palwal
35	Kos Minar No. 15	Sikri	Palwal
36	Kos Minar	Jatipur, Unsar	Panipat
37	Kos Minar	Kiwana	Panipat
38	Kos Minar	Manana	Panipat
39	Kos Minar	Siwali (Siwah)	Panipat
40	Kos Minar	Taraf Afghan	Panipat
41	Kos Minar	Taraf Unsar	Panipat
42	Old Mughal Kos Minar	Akbarpur, Barota	Sonepat
43	Old Mughal Kos Minar	Baiyanpur	Sonepat
44	Old Mughal Kos Minar	Gannaur	Sonepat
45	Old Mughal Kos Minar	Jagdishpur	Sonepat
46	Old Mughal Kos Minar	Jawahri	Sonepat
47	Old Mughal Kos Minar	Panchi Gujran	Sonepat
48	Old Mughal Kos Minar	Rajpur	Sonepat
49	Old Mughal Kos Minar	Sonepat	Sonepat

Annexure D: Monuments of national importance declared under the 1951 Act

Annexure D (I): The following is the list of ‘ancient and historical monuments’ of national importance that were declared under The Ancient and Historical Monuments and Archaeological Sites and Remains (Declaration of National importance) Act, 1951 at the time of passing of the Act. This Act was amended between 1951 and 1958 to add more monuments to the list.

All the monuments and sites in the list are from the princely states of Patiala and East Punjab, Travancore-Cochin, Hyderabad, Suarashtra, Rajasthan, Mysore and Madhya Bharata.

Sl.	Name of the Monument	Locality	District
Patiala and East Punjab States Union			
1	Bhatinda Fort	Bhatinda	Bhatinda
2	Pinjaur gardens and Monuments of Fidai Khan	Pinjaur	Kandaghat
Travancore-Cochin State			
1	Mural Paintings (16-17th century) on the walls of the Ten- Kailashanath temple	Trichur	
2	Mural Paintings (16-17th century) on the walls of the Mattanoheri Palace	Mattanehari town	
3	Mural Paintings on the walls of the Siva temple	Thiruvanchikulam	
4	Mural Paintings (17th -18th century) on the walls of the Srikoil of the Siva temple at Chemmanthatta	Eyyal	
5	Mural Paintings on the walls of the Srikoil of the Pallimanna temple	Vadakkoapohary	
6	Mural painting of the walls of the Sriramaswami temple at triprayar	Triprayar	
7	Mural Paintings of the 17th -18th century on the walls of the Srikoil of the Siva Temple at Peruvanam and wooden bracket images of a still earlier period on the Srikoils of the same time	Oorakam	
8	Twenty-nine wooden bracket images on the outer walls of the srikoil of the Vishnu temple as Katavallur and other works of art in the same shrine	Katavallur	
Hyderabad State			
1	Ajanta Caves	Ajanta	Aurangabad
2	Aurangabad Caves	Aurangabad	Aurangabad
3	Daulatabad Fort and Monuments therein (e.g. Chand Minar)	Daulatabad	Aurangabad
4	Ellora Cave	Ellora	Aurangabad
5	Pithalkhora Caves	Pithalkhora	Aurangabad
6	Tomb of Aurangzeb	Khuldabad	Aurangabad
7	Tomb of Malik Ambar	Khuldabad	Aurangabad
8	Tomb of Rabia Diurani (Bibi-ka-Maqbara)	Aurangabad	Aurangabad
9	Baihmani Tombs	Ashtur	Bidar
10	Barid Shahi Tomb	Bidar City	Bidar
11	Bidar Fort	Bidar City	Bidar
12	Madrasa Mabmud Gawan	Bidar City	Bidar

Sl.	Name of the Monument	Locality	District
13	Gulbarga Fort and Great Mosque in the Fort	Gulbarga	Gulbarga
14	Hafth Gumbad Tomb of Firoz Shah	Gulbarga	Gulbarga
15	Char Minar	Hyderabad City	Hyderabad
16	Golconda Fort and Tombs	Golconda	Hyderabad
17	Nagnath Temple	Aundha	Parbhani
18	Alampur Temples	Alampur	Raichur
19	Mahadev Temple	Ittagi	Raichur
20	Ramappa Temple	Palampet	Warangal
21	Thousand Pillar Temple	Hanamkonda	Warangal
22	Warangal Fort, Defenses and Gateways	Warangal	Warangal
Saurashtra State			
1	Ananteshwar temple	Anandpur	
2	Ashokan Rock	Junagadh	
3	Caves	Junagadh	
4	Darbargadh Halved	Halved	
5	Dhank Caves	Dhank	
6	Gop temple	Gop	
7	House where Mahatma Gandhi was born and Kirti Mandir	Porbandar	
8	Inscriptions in the Harsata Mata temple	Veraval	
9	Jain temple	Talaja	
10	Jama Masjid	Veraval	
11	Jami Masjid and Rahimat Masjid, Raveli Masjid	Mangrol	
12	Navlakha temple and Step Well	Ghumli	
13	Navlakha temple	Sejakpur	
14	Neminath temple with 3 inscriptions V. S. 1333, 35, 39	Mt. Girnar	
15	Nilakantha temple	Anandpur	
16	Pindara, Durvasa Rishi's Ashram and its site	Pindara	
17	Ra Khengar Mahal (temple)	Mt. Girnar	
18	Ranak Devi's temple	Wadhawan	
19	Sun temple	Than	
20	Surya temple	Sutrapada	
21	Talaja Caves	Talaja	
22	Temples	Shatrunjay Hills	
23	Adishwar temple		
24	Balabhai's temple		
25	Bhulavani temple		
26	Chhumukha temple		
27	Dalpet Bhai and Bhagu Bhai's shrine		
28	Keshwaji Nayak temple		
29	Moti Shah's Tuk temple		

Sl.	Name of the Monument	Locality	District
30	Nandeshwara Dipa temple		
31	Panch Pandava temple		
32	Vastupal temple	Junagadh	
33	Varaha Mandir	Kadwar	
Rajasthan State			
1	Gumbad Khan-i-Khana	Alwar	Alwar
2	Siva Temple	Alwar	Alwar
3	Neel Kantha Mahadev's Temple	Banswara	Banswara
4	Siva Temple and Ruins	Arthuna	Banswara
5	Sun Temple	Talwara	Banswara
6	Akbar's Chhatri	Bayana	Bharatpur
7	Ancient fort with its monuments	Bayana	Bharatpur
8	Brahmabad Idgah	Bayana	Bharatpur
9	Islam Shah's Gate	Bayana	Bharatpur
10	Jehangir's Gateway	Bayana	Bharatpur
11	Jhajri	Bayana	Bharatpur
12	Lodhi's Minar	Bayana	Bharatpur
13	saraj Sad-ul-lab	Bayana	Bharatpur
14	Usha Mandir	Bayana	Bharatpur
15	Chaurasi Khamba Temple	Kaman	Bharatpur
16	Colosal image of Yaksha	Noh	Bharatpur
17	Deeg Bhawans(Palace)	Deeg	Bharatpur
18	Looted Gun	Deeg	Bharatpur
19	Marbel Jhola	Deeg	Bharatpur
20	Delhi Gate	Bharatpur Fort	Bharatpur
21	Fateh Burj near Anah Gate	Bharatpur Fort	Bharatpur
22	Jawahar Burj and Ashtadhatu gateway	Bharatpur Fort	Bharatpur
23	Lal Mahal	Rupvas	Bharatpur
24	Bhandasar Jain Temple	Bikaner	Bikaner
25	Fort Bhatner	Hanumagarh	Bikaner
26	Jain temple of Susani Goddess	Morkhena Village	Bikaner
27	Pallu Jaina Sculptures	Bikaner	Bikaner
28	Wall paintings of Hardoti school in the Palace	Bundi	Bundi
29	Jogni Jogua temple	Dholpur	Dholpur
30	Sher Gahr Fort	Dholpur	Dholpur
31	Jaina Temple inscription	Baroda	Dungarpur
32	Somnath Temple	Dev Somnath	Dungarpur
33	Banjaron ki Chhatri containing two pillars similar to the railing pillars of Bharhut stupa	Lalsote	Jaipur
34	Baori	Abaneri	Jaipur
35	Harsat Mata ka Mandir	Abaneri	Jaipur

Sl.	Name of the Monument	Locality	District
36	Baories old	Todaraisingh	Jaipur
37	Kala Pahar temple	Todaraisingh	Jaipur
38	Kalyanraji's temple	Todaraisingh	Jaipur
39	Laxmi Narainji's temple	Todaraisingh	Jaipur
40	Pipaji's temple (near dispensary)	Todaraisingh	Jaipur
41	Bisal Deoji's temple	Bisalapur	Jaipur
42	Fresco Paintings in the Ambar palace (Personal property of the Maharaja)	Amber	Jaipur
43	Harshnath Temple	Harshnath-Sikar	Jaipur
44	Jama Masjid	Amber	Jaipur
45	Laxmi Narainji's temple	Amber	Jaipur
46	Sri Jagat Siromaniji Temple	Amber	Jaipur
47	Sun Temple	Amber	Jaipur
48	Hathi Temple	Kakore	Jaipur
49	Inscription in Fort	Nagar	Jaipur
50	Mand Kila tal inscription	Nagar	Jaipur
51	Yupa pillars in Bichpuria temple	Nagar	Jaipur
52	Inscription	Panwar	Jaipur
53	Jain temple	Sawai Madhopur Alanpur	Jaipur
54	Persian inscription in Baori	Sawai Madhopur Alanpur	Jaipur
55	Punderikji ki haveli- Paintings in a room	Brahmpure	Jaipur
56	Ranthambore fort	Ranthambore	Jaipur
57	Temple containing Fresco paintings	Gultaji	Jaipur
58	Yupa pillars recovered from mounda	Barmala	Jaipur
59	Fort including ancient temples	Jaisalmer	Jaisalmer
60	Buddhist Caves	Hathiagor	Jhalawar
61	Buddhist caves, Pillars, idols	Kolvi (Dag)	Jhalawar
62	Buddhist Caves and Pillars	Binnayaga (Dag)	Jhalawar
63	Caves of Naranjani, etc	Binnayaga (Dag)	Jhalawar
64	Old temples near the Chandrabhaga	Jhalrapatan	Jhalawar
65	Fort	Mandore	Jodhpur
66	Wall paintings in the palaces of Maharaja Gopal Lal	Karauli	Karauli
67	Old temples, statues and Inscriptions	Shergarh	Kotah
68	Siva temple and two unpublished Gupta inscriptions	Charohoma	Kotah
69	Temple (12th century)	Baran	Kotah
70	Temple, fort wall and statues	Dara and Mukan Dara	Kotah

Sl.	Name of the Monument	Locality	District
71	Temple with Incriptions	Kanwara	Kotah
72	Yupa Pillars	Badva	Kotah
73	Fort of Chitor as a whole	Chitor	Udaipur
74	Fort of Kumbhulghar as a whole	Kumbhargarh	Udaipur
75	Maha kal and two other temples	Bijholi	Udaipur
76	Rock Inscription (12th Century)	Bijholi	Udaipur
77	Sas Bahu Temples	Nagada	Udaipur
Mysore State			
1	Aprameyaswami Temple	Malur	Bangalore
2	Aaharkhana	Doddaballapur	Bangalore
3	Conotaph	Bangalore	Bangalore
4	Old dungeon fort and gates	Bangalore	Bangalore
5	Tipu Sultan's Palace	Bangalore	Bangalore
6	Fort	Devanahalli	Bangalore
7	Tipu Sultan's Birthplace	Devanahalli	Bangalore
8	Syed Ibrahim's Tomb or bada makkan	Channapatna	Bangalore
9	Akkatangi Temple and Asoka Inscription of Emmethammanagundu	Siddepur	Chitradurg
10	Asoka Inscription	Brahmagiri	Chitradurg
11	Fortress and Temples on the Hill	Chitradurg	Chitradurg
12	Hariharosvar Temple	Harihar	Chitradurg
13	Inscriptions and Jatingi, Rameswar Temple	Jatingi Rameshwara Hill	Chitradurg
14	Santhebagilu and Rangayyanabagilu with Preserved bastions	Chitradurg	Chitradurg
15	Adinath Basti	Halebidu	Hassan
16	Hoysaleswar Temple	Halebidu	Hassan
17	Kedaraswara Temple	Halebidu	Hassan
18	Parsvanatha Basti	Halebidu	Hassan
19	Santinatha Basti	Halebidu	Hassan
20	Akkana Basti	Sravanabelgola	Hassan
21	Chandragupta Basti	Sravanabelgola	Hassan
22	Chavundaraya Basti	Sravanabelgola	Hassan
23	Gomatesvara	Sravanabelgola	Hassan
24	Inscriptions	Sravanabelgola	Hassan
25	Parsvanath Basti	Sravanabelgola	Hassan
26	Buohesvara Temple	Koravangala	Hassan
27	Fort and Dungeons	Manjarabad	Hassan
28	Isvara Temple	Arsikere	Hassan
29	Kalyani	Hulikere	Hassan
30	Kesava Temple and Inscriptions	Belur	Hassan

Sl.	Name of the Monument	Locality	District
31	Lakshmidēvi Temple	Doddagaddavalli	Hassan
32	Lakshminarasimha Temple	Nuggehalli	Hassan
33	Sadashiva Temple	Nuggehalli	Hassan
34	Nagesvara and Chennakesava Temple	Mosale	Hassan
35	Amritesvara Temple	Amritapura	Kadur
36	Yupastambha and Isvara Temple	Hiremagalur	Kadur
37	Vidyasankara Temple	Sringeri	Kadur
38	Viranarayana Temple	Belavadi	Kadur
39	Bhoganandisvara Temple	Nandi Hills	Kolar
40	Tipu's Palace	Nandi Hills	Kolar
41	Yoganandisvara Temple	Nandi Hills	Kolar
42	Haidar Ali's Birthplace	Budikote	Kolar
43	Kolaramma Temple	Kolar	Kolar
44	Mokhbāra (Mausoleum of Hyder Ali's father)	Kolar	Kolar
45	Someshwara Temple	Kolar	Kolar
46	Ramalingesvara temples and inscriptions	Avani	Kolar
47	Arkosvara temple	Hale Alur	Mysore
48	Gaurisvara Temple	Yalandur	Mysore
49	Kesava Temple	Somanathapur	Mysore
50	Kirthinarayana Temple	Talkad	Mysore
51	Vaidyosvara temple	Talkad	Mysore
52	Lakshmikanta Temple	Mallur	Mysore
53	Mallikarjun Temple	Basral	Mysore
54	Ramesvara Temple	Narasamangala	Mysore
55	Sidlu Mallikarjun Temple	Bettadapur	Mysore
56	Srikantosvara Temple	Nanjangud	Mysore
57	Sri Vijayanarayana Temple	Gundlupet	Mysore
58	Colonel Bailey's Dungeon	Seringapatam	Mandya
59	Daria Daulat Bagh	Seringapatam	Mandya
60	Gumbaz containing tomb of Tipu Sultan	Seringapatam	Mandya
61	Jumma Masjid	Seringapatam	Mandya
62	Obolisk Monuments and Forts walls near the Breach	Seringapatam	Mandya
63	Spot Where tipu's Body was found	Seringapatam	Mandya
64	Sri Kanthirava statue in Narasimha temple	Seringapatam	Mandya
65	Sri Ranganathaswami Temple	Seringapatam	Mandya
66	T. Innman's Dungeon	Seringapatam	Mandya
67	Kesava Temple	Nagamangala	Mandya
68	Lakshminarasimha Temple	Marohalli	Mandya
69	Lakshminarayana Temple	Hosaholulu	Mandya
70	Lakshminarayana Temple	Sindhaghatta	Mandya

Sl.	Name of the Monument	Locality	District
71	Narayanaswami Temple	Melkote	Mandya
72	Panchakota Basti	Kanbadahalli	Mandya
73	Panchalingesvara Temple	Govindanahalli	Mandya
74	Temples	Tonnar	Mandya
75	Aghoreshvara temple	Ikkeri	Shimoga
76	Anekal Temple	Bandalike	Shimoga
77	Somesvara Temple	Bandalike	Shimoga
78	Trimurthinarayana Temple	Bandalike	Shimoga
79	Bastis and Inscriptions	Huncha	Shimoga
80	Bherundesvara	Belgavi	Shimoga
81	Kedaresvara temple	Belgavi	Shimoga
82	Tripurantosvara temple	Belgavi	Shimoga
83	Devaganga ponds	Basavanabyane	Shimoga
84	Fort	Chennagiri	Shimoga
85	Fort	Kavaledurga	Shimoga
86	Fortress and Renuka Devi Temple	Chandragutti	Shimoga
87	Inscribed Pillar	Malavalli	Shimoga
88	Inscribed Pillar	Talagunda	Shimoga
89	Pranavesvara temple	Talagunda	Shimoga
90	Jain Basti with Brahmadeva Pillar	Melugi	Shimoga
91	Kaitobhosvara Temple	Kubatur	Shimoga
92	Parsvanatha Basti	Kubatur	Shimoga
93	Ramesvara Temple	Kubatur	Shimoga
94	Mallikarjun and Ramesvara Temple	Kadkalsi	Shimoga
95	Musafirkhana and Honda	Santhebonnur	Shimoga
96	Palace site outside Fort	Nagar	Shimoga
97	Ramesvara Temple	Keladi	Shimoga
98	Ramesvara Temple	Kudli	Shimoga
99	Shahji's tomb	Hodigore	Shimoga
100	Shivappa Naik's Fort	Nagar	Shimoga
101	Temples and Inscriptions	Udri	Shimoga
102	Temples and Inscriptions	Kuppagadde	Shimoga
103	Channigaraya Temple	Aralaguppe	Tumkur
104	Fort	Madhugiri	Tumkur
105	Jumma Masjid	Sira	Tumkur
106	Malik Rihan Darga	Sira	Tumkur
107	Kedaresvara temple	Nagalapura	Tumkur
108	Ononnakesava temple	Nagalapura	Tumkur
Madhya Bharata State			
1	Athakhamba	Gyaraspur	Bhilsa
2	Bajramath	Gyaraspur	Bhilsa
3	Hindola Torana	Gyaraspur	Bhilsa

Sl.	Name of the Monument	Locality	District
4	Maladevi Temple	Gyaraspur	Bhilsa
5	Bara Khambi	Udaypur	Bhilsa
6	Pisnarika Temple	Udaypur	Bhilsa
7	Udayeshwar Mahadeva Temple	Udaypur	Bhilsa
8	Bbimagaja	Pathari	Bhilsa
9	Caves	Pathari	Bhilsa
10	Bijamandal Mosque	Bhilsa	Bhilsa
11	Lohangi Hill Capital	Bhilsa	Bhilsa
12	Caves1 to 20	Udaygiri	Bhilsa
13	Dashavatar Temple	Badoh	Bhilsa
14	Gadarmal Temple	Badoh	Bhilsa
15	Jain Temple	Badoh	Bhilsa
16	Sola Khambi	Badoh	Bhilsa
17	Khamb Baba (Heliodorsa Pillar)	Beenagar	Bhilsa
18	Brick temple (two)	Kherat	Bhilsa
19	Opea Air Museum	Kherat	Bhilsa
20	Fort	Ater	Bhilsa
21	Siddheshwar Temple	Nemawar	Dewas
22	Unfinished Temple	Nemawar	Dewas
23	Adar Gumbaaz	Mandu	Dhar
24	Alamgir gate	Mandu	Dhar
25	Ancient Hindu Bhodi	Mandu	Dhar
26	Ancient Hindu well	Mandu	Dhar
27	Andheri Baodi	Mandu	Dhar
28	Ashraf Mahal	Mandu	Dhar
29	Baz Bahadur's Palace	Mandu	Dhar
30	Bhagwania Gate	Mandu	Dhar
31	Bhangi Gate	Mandu	Dhar
32	Chumpa Baodi	Mandu	Dhar
33	Chhapan Mahal	Mandu	Dhar
34	Chistikhan's Mahal	Mandu	Dhar
35	Chor Kot	Mandu	Dhar
36	Chorakot Mosque	Mandu	Dhar
37	Nahar Jharoka Compound	Mandu	Dhar
38	Daika Mahal	Mandu	Dhar
39	Daike chhoto Behen ke Mahal	Mandu	Dhar
40	Darya Khan's Tomb	Mandu	Dhar
41	Delhi Gate	Mandu	Dhar
42	Dharmashhalla	Mandu	Dhar
43	Dilawarkhan's Mosque	Mandu	Dhar
44	Ek-khamba Mahal	Mandu	Dhar
45	Gadhasa'a Palace	Mandu	Dhar

Sl.	Name of the Monument	Locality	District
46	Gadhasa's Shop	Mandu	Dhar
47	Gadi Dharmaja	Mandu	Dhar
48	Hammam	Mandu	Dhar
49	Hathi Gate	Mandu	Dhar
50	hathi Mahal	Mandu	Dhar
51	Hindola Mahal	Mandu	Dhar
52	Hoshang's Tomb	Mandu	Dhar
53	Jahaz mahal	Mandu	Dhar
54	jahangirpur gate	Mandu	Dhar
55	Jama Msajid	Mandu	Dhar
56	Kali Baodi	Mandu	Dhar
57	Kapoor Talao and the ruins its banks	Mandu	Dhar
58	Lal Bag	Mandu	Dhar
59	Lal Bungalow	Mandu	Dhar
60	Lohani Caves	Mandu	Dhar
61	Lohani Gate	Mandu	Dhar
62	Jali Mahal	Mandu	Dhar
63	Nahar Jharoka	Mandu	Dhar
64	Mahmud's Tomb	Mandu	Dhar
65	Malik Moghi's Mosque	Mandu	Dhar
66	Mosque near Sopi Tank	Mandu	Dhar
67	Mosque near Tarapur Gate	Mandu	Dhar
68	Mosque North west of Daryakhan's Tomb	Mandu	Dhar
69	Nameless Tomb	Mandu	Dhar
70	Nameless Tomb	Mandu	Dhar
71	Nameless Tomb	Mandu	Dhar
72	Nameless Tomb	Mandu	Dhar
73	Neelkanth	Mandu	Dhar
74	Rampol Gate and the Mosque Opposite to it	Mandu	Dhar
75	Royal Palaces	Mandu	Dhar
76	Rupmati Pavillion	Mandu	Dhar
77	Caravan Sarai	Mandu	Dhar
78	Sarai near Darykhan's Tomb	Mandu	Dhar
79	Sat Kothari Cave	Mandu	Dhar
80	Somoti Kund	Mandu	Dhar
81	Songarh Gate	Mandu	Dhar
82	Tarapur Gate	Mandu	Dhar
83	Teveli Mahal	Mandu	Dhar
84	Tomb and mosque attached	Mandu	Dhar
85	Tomb north of Alamgir Gate	Mandu	Dhar
86	Tomb north of Daryakhan's Tomb	Mandu	Dhar
87	Tower of Victory	Mandu	Dhar

Sl.	Name of the Monument	Locality	District
88	Tripholia Gate	Mandu	Dhar
89	Ujali Baodi	Mandu	Dhar
90	Water Palace	Mandu	Dhar
91	Bhoja Shala and Kamal Maula's Mosque	Dhar	Dhar
92	Latki Masjid	Dhar	Dhar
93	Buddhist caves 1 to 7	Bagh	Dhar
94	Water Palace	Sadalpur	Dhar
95	Mahadev Temple	Amrol	Gwalior
96	Tila Monument	Pawaya	Gwalior
97	Tomb of Mohammad Ghaus	Gwalior	Gwalior
98	Jain Temples 1 to 5	Budhi Chander	Guna
99	Chanderi Fort and....	Chanderi	Guna
100	Bada Madarsa	Chanderi	Guna
101	Battisi Baodi	Chanderi	Guna
102	Badal Mahal gateway	Chanderi	Guna
103	Jama Msajid	Chanderi	Guna
104	kati Ghati	Chanderi	Guna
105	Koshak Mahal	Chanderi	Guna
106	Nizam-ud-din's tomb	Chanderi	Guna
107	Shahajadi-ka-Roza	Chanderi	Guna
108	Mohajamata Temple	Tershi	Guna
109	Monastery	Tershi	Guna
110	Torana gate	Tershi	Guna
111	Monastery	Kadwaha	Guna
112	Temples 2 to 7	Kadwaha	Guna
113	Gwalior fort and...	Gwalior	Gwalior
114	Chaturbhuj Temple	Gwalior	Gwalior
115	Mansingh's Palace	Gwalior	Gwalior
116	Rock out Jain colossi	Gwalior	Gwalior
117	Sas Bahu Temples	Gwalior	Gwalior
118	Teli Ka Mandir	Gwalior	Gwalior
119	Ballaleshwar	Oon (Un)	Khargone
120	Chaubara Dera	Oon (Un)	Khargone
121	Gupteshwar	Oon (Un)	Khargone
122	Jain temples 1 to 3	Oon (Un)	Khargone
123	Temples of Mahakaleshwar 1 and 2	Oon (Un)	Khargone
124	Temple of Nilakantheshwar	Oon (Un)	Khargone
125	Brahmanical Rookout temples	Dhamnar	Mandasor
126	Buddhist caves	Dhamnar	Mandasor
127	Nau torana temple	Khor	Mandasor
128	Yasodharman's Pillars of Victory	Sondni	Mandasor
129	Ekottarso Mahadeva Temple	Mitaoli	Murena

Sl.	Name of the Monument	Locality	District
130	Gadhi	Padhavli	Murena
131	Kakenmadha Temple	Suhania	Murena
132	Temple	Padhavli	Murena
133	Temples 1 to 22	Naresar	Murena
134	Large Shiva Temple	Mahua	Sivapuri
135	Small Shiva Temple	Mahua	Sivapuri
136	Monastery	Ranod	Sivapuri
137	Monastery	Surwaya	Sivapuri
138	Open air Museum	Surwaya	Sivapuri
139	Shiva Temple	Surwaya	Sivapuri
140	Surwaya Gadhi	Surwaya	Sivapuri

Annexure D (II): The following is the list of ‘archaeological sites and remains’ of national importance under The Ancient and Historical Monuments and Archaeological Sites and Remains (Declaration of National importance) Act, 1951 at the time of passing of the Act.

Sl.	Site	Locality	District
Saurashtra State			
1	Ancient mound	Darbagadh Shihor	
2	Ancient mound	Intwa	
3	Ancient mound	Rangpur	
4	Ancient mound	Sejampur	
5	Ancient mound	Valabhipur	
Travancore-Cochin State			
1	Ariyannur Umbrellas, a prehistoric site consisting of seven or more kudakals or umbrella stones	Ariyannur	
2	Burial cave of Chovannur	Ohovannur	
3	Burial cave of Eyyal	Eyyal	
4	Burial cave of Kandanasseri	Kandansseri	
5	Burial cave of Kattakampal	Kattakampal	
6	Burial cave of Kakkad	Kunnamkulam	
7	Kudakallu Paramb, a prehistoric site consisting of 50 to 60 kudakals or umbrella monuments	Cheramanagad	
Hyderabad State			
1	Ancient Mound	Paithan	Aurangabad
2	Prehistoric Site	Evathali	Gulbarga
3	Prehistoric Site	Rajenkallur	Gulbarga
4	Ancient Mound	Kondspur	Medak
5	Ancient Mound	Kopbal	Raichur
6	Ancient Mound	Maski	Raichur
7	Prehistoric Site	Benkal	Raichur
8	Prehistoric Site	Janampet	Warangal
Madhya Bharata State			
1	Ancient site	Besnagar	Bhilsa
2	Buddhist Stupa	Gyaraspur	Bhilsa
3	Ruins of Gupta temple	Udaygiri	Bhilsa
4	Ruins in Bhoipura	Mandu	Dhar
5	Ruins on the west of Rewa Kund	Mandu	Dhar
6	Excavated site	Karawad	Newar
7	Ancient site	Pawaya	Gird
8	Ancient Mounds, viz., Bhairon Gadh, Vaishya Tekri, Kumbhar Tekri	Ujjain	Ujjain
Mysore State			
1	Prehistoric Site	Chikjala	Bangalore
2	Prehistoric Site	Hejjala	Bangalore
3	Prehistoric Site	Managoudanahalli	Bangalore

Sl.	Site	Locality	District
4	Prehistoric Site	Sevandurga	Bangalore
5	Prehistoric Site	Brahmagiri	Chitradurga
6	Prehistoric Site	Chandravalli	Chitradurga
7	Prehistoric Site	Hunkunda	Kolar
8	Prehistoric Site	Kittur	Mysore
Rajasthan State			
1	Ancient Remains	Pandrupol	Alwar
2	Ancient Site	Bhangadh	Alwar
3	Ancient Remains	Vithal Deva	Banswara
4	Ancient Mound	Malah	Bharalpur
5	Ancient Mound	Noh	Bharalpur
6	Ancient Mounds	Badopal	Bikaner
7	Ancient Mounds	Bhadrakali	Bikaner
8	Ancient Mounds	Bhannar Theri	Bikaner
9	Ancient Mounds	Dhokal	Bikaner
10	Ancient Mounds	Manak	Bikaner
11	Ancient Mounds	Munda	Bikaner
12	Ancient Mounds	Peer Sultan	Bikaner
13	Ancient Mounds	Rang Mahal	Bikaner
14	Ancient Mounds	Kalibanga	Bikaner
15	Ancient Mounds	Pilibanga	Bikaner
16	Ancient Mound	Biror	Bikaner
17	Ancient Mound	Binjor	Bikaner
18	Ancient Mound	Chak 86	Bikaner
19	Ancient Mound	Mathula	Bikaner
20	Ancient mound	Tarkhanowala Dera	Bikaner
21	Ancient Mound	Nainwa, Lakherl and Keshwarai Patan	Bundi
22	Ancient Mound	Abaneri	Jaipur
23	Ancient Mound	Bundwali-Doongri	Jaipur
24	Ancient Mound	Gariagarh (Newal)	Jaipur
25	Ancient Mound	Maheshra	Jaipur
26	Ancient Mound	Nagar	Jaipur
27	Ancient Mound	Raniwas	Jaipur
28	Ancient Mound	Sikral	Jaipur
29	Devapura Barodia Mounds	Jhalai	Jaipur
30	Excavated Site	Nagar	Jaipur
31	Excavated Site	Rairh (Newal)	Jaipur

Sl.	Site	Locality	District
32	Excavated Site	Bairat and Sambhar	Jaipur
33	Ancient Site	Lodruva Patna	Jaisalmer
34	Ancient Ruins	Dalsagar Ganga Dhar	Jhalawar
35	Ancient Ruins	Dudhaliya	Jhalawar
36	Ancient ruins and structural remains	Krishnavilas	Kotah
37	Ruins of Temples	Artu or Ganesh Gunj	Kotah
38	Ancient Ruins	Kalyanpur	Udaipur
39	Ancient Ruins	Nagari	Udaipur
40	Ancient Ruins	Badoli	Udaipur

Annexure E: Standard Operating Procedure (SoP) followed by ASI for declaring monuments of national importance

1. Protection proposals are received from Circles, in Form-B.
2. The proposal is examined by the Technical Evaluation Committee for assessment and recommendation to DG, ASI.
3. Recommended proposal is forwarded for the approval of the Honourable Culture Minister.
4. Upon receiving the HCM's approval, the preliminary draft is prepared and sent to for publication of the notification in Gazette of India inviting comments from the public in two months.
5. The copies of the notification are also circulated to stakeholders and affixed at prominent location at the monument/site for the knowledge of local people.
6. Upon passing of two months from the date of publishing of notification, all objection received are examined and resolved following due procedure.
7. Thereafter notification under section 4(3) is sent to Ministry of Law and Justice for vetting of the draft.
8. Upon receiving the vetted draft, the file is sent to HCM for his approval.
9. On receiving the approval of the HCM, notification is published for declaration of the monument/site as of national importance.

Annexure F: Sample of Form B

ARCHAEOLOGICAL SURVEY OF INDIA

FORM B

ASSESSMENT OF MONUMENTS AND SITES SUGGESTED FOR PROTECTION

PART – I

(To be filled in by circle Officer and submitted to the Director General)

State:

District:

1. Name of monument/site (including alternative names, if any)
2. Locality
3. Geo-coordinates
4. Sub –division: Tehsil/Taluk:
Revenue Circle: Police Station:
Post Office:
5. Approach (including nearest railway station, transport and halting facilities and authority to be addressed for reservation of accommodation)
Nearest railway Station:
Nearest Bus-Stand:
Halting facility:
6. Brief history, importance and outstanding features of the monuments/site including reference to sculptures, paintings, inscription, etc. (Photographs and if possible, sketches to be pasted on sheets to be attached)
7. Published references (selected but including reference to Imperial and District Gazetteers and local manual)
8. Topographical features
9. Climatic data (temperature, rainfall etc)
10. Ownership
11. Whether the monument is being looked after by any Government or private body
12. Utilization, if any,

13. Encumbrances, if any,
 14. Any revenue from endowment, lease etc.
 15. Liability regarding existing staff etc. if the monument is declared protected.
 16. Minimum staff that may be necessary if the monument is declared protected.
 17. Anticipated expenditure on Special and Annual repairs (excluding staff).
(Main items of proposed special repairs may be given)
 18. Whether it is recommended for protection as a monument/site of national importance of so, Section under which protection is proposed.
 19. Whether the owner is willing to enter into an agreement, if so, under what conditions
(Entry against this column may be left out, if delay is anticipated in collecting the information.
 20. Area and boundary recommended for protection.
 21. Any other remarks.
 22. Signature and designation of the inspecting officer and date
 23. Remarks of the Superintending Archaeologist with special reference to column 16-18 (if the inspecting officer is other than the Superintending Archaeologist)
 24. Signature of the Superintending Archaeologist and date
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Part II

(To be filled in by the Directorate)

25. Recommendation of the Deputy Director General (Monuments)
26. Signature and date
27. Recommendation of the Director General to Government
28. Instructions to be given to the Circle Office
29. Signature and date
30. Brief note on action taken, giving reference to office files
31. Signature of the Section Officer and date

Image Sources

Image No	Image	Source/retrieved from
1	Tombs of John Albert Cope and Henry Gassen on Manki-Kumta Road, Uttara Kannada district, Karnataka	http://www.asidharwadcircle.in/monument/tombs-on-the-right-side-of-the-manki-kumta-road/ (screenshot)
2	Memorial of G H Damant in Khonoma, Nagaland	http://asiguwahaticircle.gov.in/gallery.html
3	Kos Minar on Ajmer-Kakaria Road, Kakariya, Rajasthan	https://asijaipurcircle.nic.in/photo%20gallery/monuments/Ajm-Jpr%20road%20kakariya.jpg
4	Chhoti Gumti, Green Park, New Delhi	Courtesy: Jayasimha K R
5	Statue of the tiger in Kumta, Karnataka	http://www.asidharwadcircle.in/monument/the-figure-of-a-tiger-opposite-the-english-school/
6	17th century forge-welded iron cannon is mounted at Keela Alankam in Thanjavur	https://asichennai.gov.in/thanjavur-subc-gallery.html
7	State-wise list of monuments of national importance	Archaeological Survey of India
8	Public notice boards outside Lakshminarasimha temple, Nuggehalli, Karnataka	Courtesy: Jayasimha K R
9	Public notice boards outside Lakshminarasimha temple, Nuggehalli, Karnataka	Courtesy: Jayasimha K R
10	Example of a cultural board (Qutub Minar, Delhi)	Courtesy: Jayasimha K R

References

Comptroller and Auditor General of India. 'Performance Audit of Preservation and Conservation of Monuments and Antiquities' (Report No.18 of 2013)

Palgrave Macmillan. Cambridge Imperial and Post-Colonial Studies Series on 'Ireland and India Nationalism, Empire and Memory'. Michael Silvestri (2009)

Rajya Sabha Secretariat. Parliamentary Standing Committee Report on 'Issues Related to Untraceable Monuments and Protection of Monuments in India' (2022)