

KARNATAKA FOREST DEPARTMENT

Office of the Deputy Conservator of Forest, Gadag Division, Gadag.

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Date: 04-12-2020

Recommendation

Subject: Online submission of application for forest clearance under section 2 of Forest (Conservation) Act, 1980, Proposal No. & Name: FP/KA/MIN/42366/2019

Sangli Gold Mine, Jalligeri Village, Shirahatti Taluk

Gadag District,

Certified that I have inspected the proposed area of 39.90 Ha in Jalligeri Village Sy No: 45,49 & 50 of Shirahatti Taluk, Gadag District along with RFO Shirahatti, DyRFO Kadkol Section and other frontline staff on 02-12-2020 (Wednesday).

After carefully examining the submitted hard copy, prima face, it is found that the user agency has submitted previous proposals various times to the Forest Department since 2006 and the latest one being the online application FP/KA/MIN/26675/2017. The same is not mentioned by the user agency even though asked specifically at Section B-1 of the application, hence suppressing the facts.

The user agency has proposed to do open cast gold mining with three open pits and four dumps. The mining plan also includes the use of explosives and blasting in the wildlife sanctuary area. We are aware that the open cast mining is the most devastating way of mining methods which negatively affects the environment and the land cover. The area being declared as a wildlife sanctuary and as mentioned in the section 11.1.3 of the mining plan, various fauna and flora inhibit the proposed mining area. The blasting impacts of the mining plan of section 11.2.6 has not considered the noise and vibrations affecting the smaller fauna and flora.

The water requirement for the project as mentioned by the user agency is 60 Kiloliter per day and 1000 Kiloliter per day for the extraction plant totaling to 1060

Kiloliters per day and the source of water is mentioned as the "Ground Water". The eco-system services for the ground water is not calculated by the user agency anywhere in their cost benefit analysis hence taking it free of cost in turn was sequestered and fixed by the forests in and around the plant and proposed mining site. The commercial extraction of water is banned as per the draft eco-sensitive zone proposal sent to the government.

The user agency proposes to establish an extraction plant at a distance of 3.5 Km from the proposed area at Sy. No 46, 47, 49, 50 and 51 of Attikatti Village within the Eco Sensitive Zone of the Kappathagudda Wildlife Sanctuary. The draft eco sensitive zone notification submitted to the government clearly prohibits red category industries and factories in the zone. The extraction procedure of the user agency clearly mentions the use of cyanide as per the section 10.7 of the mining plan which categorizes the extraction plant in red category with respect to the hazardous chemicals used, water utilization and acid utilization.

As per section 11.3.12 of the Mining Plan submitted by the user agency, the project generates 40 direct and 100 indirect jobs totaling 140 jobs which is negligible compared to the jobs created through agriculture and proposed eco-tourism in the area. The user agency proposed to purchase agricultural lands of the villagers to dump the top soil (11.3.2), and also has purchased lands for establishment of the extraction plant by which depriving the agricultural land holders of their jobs.

The user agency in its cost benefit analysis mentioned that the revenue in the part of the government through the whole process by means of wages to employees, taxes, royalty, lease rent, DMF and CSR is a mere 350 Crores which is way below the ecological damages and eco system services added together which the government needs to invest in recovery failing which it has to be considered as a loss to the government.

The whole area is a valuable biodiversity reserve crucial for conservation of wildlife peculiar to the deccan plateau dry scrub forests, with very good potential. It is also an important watershed for the surrounding agricultural tracts which are dependent on rain water runoff for their basic needs. It is the part of the only lung space of the Gadag District which has a mere 6.9 % of forest cover. Though gold, which is of highly economic importance is available in small quantities scattered in Kappathagudda as per the reconnaissance survey done by RMML. It is to be noted that more than the removal of ore in the actual area applied for, the accompanying disturbances due to road construction, movement of the vehicles, noise and dust pollution and disruption of drainage due to blasting etc... will be of greater peril to

the fragile eco-system. Moreover, with the unprecedented demand in ore market and the expectation of windfall gains more and more such applications will be filed, and cannot be refused on grounds of equity.

The Government of Karnataka has declared this fragile ecosystem as a Wildlife Sanctuary vide notification No: FEE 57 FWL 2019, Dt: 16-05-2019 under the Wildlife Protection Act, 1972 making it part of the protected area networks of the nation. The Apex Court in its order dated, 9th May 2002, mandated any non-forestry activity inside the sanctuary requires the clearance from the standing committee of the NBWL.

The undersigned specifically **do not recommend** the proposal and the project in greater good of environment, wildlife and rural sustainable livelihood. Disturbing nature at the cost of destroying ecosystem and various food webs for a small-scale, trial-based gold project may have irreparable damages to the wildlife sanctuary and the landscape to name a few; droughts, degradation of environment, extreme weather conditions, pollution, etc... in the already water struggling district.

Deputy Conservator of

Gadag Division