

Submission of compliance w.r.t DFO Latehar vide letter no.613 dated 17.02.2026 and MoEF&CC letter no.8-18/2024-FC dated 08.02.2026.

Sl	Compliance Sought	Submission by User Agency	DFO Comment
01	<p>The user agency has proposed diversion of 515.32 ha of forest land, out of which 307.20 ha is earmarked for overburden dumping. Since overburden dumping is a non-site-specific activity, the State Government is required to re-cast and rationalize the area proposed for overburden dumping. The user agency in consultation with the State Govt. shall explore the non-forest land nearby for such activity.</p>	<p>Essentiality and urgent requirement of the 515.32 Ha area for exclusive Mining in phases and interim OB dump within Coal Block area.</p> <p>It is submitted that the proposed diversion of 515.32 ha is exclusively for mining purposes. Due to land constraints, mining operations are planned to be undertaken in phases. Phase-I covering 208.12 ha of forest land and Phase II covering 307.20 ha of forest land. The proposed area is site-specific and technically unavoidable in view of the approved mine layout and sequencing.</p> <p>A total of approximately 1,173 million cubic metres of OB is proposed to be managed systematically within the mining area. Upon creation of adequate internal voids through progressive mining, the OB will be rehandled and backfilled in a phased manner, followed by extraction of the underlying coal seams to sustain the coal requirement of the power plant During Phase I of mining, about 322.76 million cubic metres of OB will be placed as an interim measure. This material will subsequently be rehandled for backfilling of the voids created in the initial phase of mining. The remaining approximately 832.30 million cubic metres of OB is proposed to be accommodated through continuous in-pit dumping.</p> <p>The overburden (OB) dumping scheme has been designed to minimise ecological impact by accommodating the OB within the coal block and the designated mineable area, thereby preventing disturbance to the natural ecosystem outside the mining lease area and significantly minimising potential environmental impacts such as dust generation, increased fuel consumption, and vehicular emissions in the surrounding areas.</p> <p>Considering the coal requirement of more than 12 MTPA for the</p>	<p>The total mining lease area is 1467.42 ha. Out of which, 515.32 ha is forest land and 952.10 ha is non-forest land. The prospecting operation to work out the detailed coal reserve within the mining lease has not been taken up so far. Without taking up detail prospecting, it is very difficult to estimate the actual coal reserve in the mining lease. It is reported by User Agency that maximum coal deposit is concentrated in the Central and Eastern part of the lease. Hence, without taking up complete prospecting work, it is difficult to work out the excavation area to exploit complete minerals.</p> <p>Further, as per the land use proposed in the mining plan, the mining will take up in two phases. Large chunk of non-forest land over 952.10 ha is available within the mining lease. Out of</p>

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	<p>power plant already in operation, the interim OB dumping area is planned to be excavated around 10th Year from the commencement of mining operations, on an urgent basis. This is essential to ensure uninterrupted coal supply to the plant in conformity with the Approved Mining Plan to sustain the Plant requirement.</p> <p>All operations shall be undertaken with due adherence to environmental safeguards, including benched dumping, construction of garland drains, slope stabilisation, and progressive reclamation.</p> <p>The proposed diversion of forest land of 515.32 Ha is integral to the approved mining methodology is an essential and technically unavoidable operational activity without any permanent sterilisation of coal resources.</p> <p><u>Non-Availability of alternate suitable Non-Forest Land for Overburden Dumping</u></p> <p>It is submitted that the coal block is geographically constrained and inherently site-specific. The area is surrounded by existing operational mines, coal blocks under development, and notified forest land, which severely restricts the availability of suitable non-forest land for alternative OB dumping or for rationalisation of the proposed dumping area.</p> <p>The immediate land-use configuration around the coal block is as follows:</p> <ul style="list-style-type: none"> • North: Aragundi and Rajbar coal blocks (under development) • South: Sikni coal block (operational); Jagaldaga, Goa, and Latehar coal blocks (under development) • West: Tubed coal block (operational) and Tubed West coal block (under development) 	<p>which, it is prescribed that 164.91 ha of non-forest land shall remain undisturbed. It would be worthy to utilize the non-forest land for OB dump instead of utilizing forest land for the purpose.</p> <p>In this context, it would have been better if User Agency goes for detail prospecting before starting mining operation as per approved mining plan. If mining operation shall be allowed in the detailed survey area, then it would be appropriate to utilize the non-forest land as OB dump.</p>	

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	<p style="text-align: center;"><u>Submission by User Agency</u></p> <ul style="list-style-type: none"> • East: Dense forest area, hilly terrain, and densely populated habitations <p>A location map (Annexure-A) showing the surrounding coal blocks and land-use features has been enclosed for ready reference. In addition, several other coal blocks in the broader region are at various stages of development, further constraining the availability of suitable land. An exhaustive assessment of alternatives was undertaken to identify contiguous non-forest land for external OB dumping; however, the assessment conclusively establishes that no such land is available without causing additional ecological stress to nearby protected areas, Eco-Sensitive Zones, and natural drainage systems.</p> <p>With reference to the observations of the Forest Advisory Committee regarding DSS Analysis and Inviolate Status (Sl. No. XV (iii) and (iv)), and in line with the observations of the Regional Office, MoEF&CC, it is submitted that as per the Decision Support System (DSS) analysis, the proposed mineable area of 1467.42 ha is classified as follows:</p> <ul style="list-style-type: none"> • Moderately Dense Forest (MDF): 08 ha • Open Forest (OF): 91 ha • Non-Forest Land: 1348 ha • Water Bodies: 20 ha <p>Accordingly, the entire proposed mineable area of 1467.42 ha falls under the "Not Inviolate" category as per DSS analysis.</p> <p>It is also of critical importance to highlight that the Banhardih Coal Mining Project was allocated on 25.06.2018 to meet the coal requirement of 3 x 800 MW units of PVUNL, thereby forming a vital component of regional and national power security.</p> <p>The Stage-I Forest Clearance application, submitted on 18.09.2021, has been duly scrutinised, vetted, and recommended by all</p>	

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		<p>concerned authorities, including the State Forest Department & region office MEOF &CC. However, despite the lapse of nearly four years, the Stage-I Forest Clearance is still awaited.</p> <p>During the most recent review meeting of the Ministry of Coal held on 25.11.2025, a termination notice for the coal block has been issued, citing inefficiency parameters directly attributable to the non-grant of Forest Clearance rather than any deficiency on the part of the project proponent. Continued delay poses an imminent risk of cancellation of the coal block, despite full compliance with all statutory and technical requirements.</p> <p>Further, Environmental Clearance was accorded by MoEF&CC on 03.04.2025, valid up to 03.04.2026. In the absence of Stage-I Forest Clearance, the project will be unable to operationalise the Environmental Clearance, rendering it liable to lapse. Such an eventuality would result in serious and irreversible regulatory and financial consequences, including loss of statutory approvals, disruption of mining operations, and adverse impact on power generation infrastructure of strategic and national importance.</p> <p>In view of the above, early consideration and approval of the proposal is critically required to prevent cascading regulatory invalidation, ensure continuity of mining operations, and safeguard the intended utilisation of the allocated coal block in the larger national interest.</p>	
02	Initially, mining is proposed to commence over an area of 727.24 ha, comprising 94.25 ha	As per the Approved Mining Plan, coal extraction has been designed in a scientifically sequenced, phase-wise manner, in conformity with the approved pit geometry, slope stability criteria, and principles of optimal resource recovery. The proposed diversion of 515.32 ha of forest land is exclusively for mining purposes. Owing to land	It is stated by the User Agency that selective or fragmented extraction of coal bearing forest patches would disrupt the approved pit geometry and slope

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	<p>of forest land and 632.99 ha of non-forest land, for a mining period of 30 years, as per the approved mining plan. In this context, clarification is required as to why the instant proposal cannot be re-cast by limiting the forest land proposed for diversion to 94.25 ha only.</p>	<p>constraints, mining operations are planned to be undertaken in phases. Phase I covering 208.12 ha of forest land and Phase II covering 307.20 ha of forest land. The total mineable area of the project is 1467.42 ha, out of which 515.32 ha of forest land (comprising Notified Forest and GMJ/deemed forest land) constitutes an integral and inseparable component of the approved mine geometry.</p> <p>Phase I operations envisage extraction of approximately 250 million tonnes (MT) of coal, whereas Phase II operations provide for extraction of an additional ~100 MT of coal. During Phase I, out of the planned 250 MT production, around 60 MT of coal reserves lie beneath the proposed forest land. Similarly, during Phase II, approximately 80 MT of coal reserves underlying the same forest-bearing area are proposed to be extracted in order to sustain the coal requirement of the plant in operation.</p> <p>In line with the approved mining methodology, pit design, and extraction sequence, the substantial overburden (OB) handling requirements necessitate early commencement of mining to ensure a sustainable supply to the plant. Sustained operations cannot be maintained without diversion of the entire proposed forest land of 515.32 Ha, as the coal seams beneath the forest area are integral to the approved mine plan and cannot be mined independently or in isolation.</p> <p>Further, the approved mining scheme does not permit selective or fragmented extraction, as exclusion of coal-bearing forest patches would disrupt the approved pit geometry and slope stability, Compromise scientific mining principles, Lead to unsafe working conditions, and result in sub-optimal and uneconomic recovery of</p>	<p>stability which is not correct. Because, previously it is stated that the mining operation shall be taken up in two phases. If the pit geometry will be disturbed, how the mining work would be taken in two phases. It would not be proper to accept the non-surveyed forest area as mineral deposit area. Hence, the mining should be confined to 94.25 ha in the 1st phase as applied earlier.</p>

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		<p>coal. In the absence of approval for diversion of the proposed 515.32 ha forest land, approximately 160 MT of geologically proved mineable coal reserves (comprising ~60 MT in Phase-I and ~80 MT in Phase-II) would be permanently locked and rendered inaccessible.</p> <p>It is further submitted that the Approved Mining Plan serves as the fundamental document for project execution. Various statutory clearances, including Environmental Clearance, NOC for nallah and canal diversion, and NOC for groundwater abstraction, have already been obtained based on the existing Approved Mining Plan. Any revision to the Approved Mining Plan would necessitate fresh applications for all such statutory clearances, which have been secured over the past four years.</p> <p>So, it is requested for exclusion or elimination of any coal-bearing forest patch within the total mineable area of 1467.42 ha is not technically or operationally feasible.</p> <p>It is further submitted that the present proposal for diversion of 515.32 Ha of Forest land has been reviewed and positively recommended by chain of officers and authorities including State Govt and Region office MOEF &CC.</p>	
03	<p>The State Govt. shall submit details of 94.82 ha of forest land for Undisturbed/Mining Rights for underground (UG) mining. A component wise</p>	<p>It is submitted that no underground mining is envisaged as per the approved Mining Plan. The area has been kept undisturbed solely to maintain safe pit geometry, prevent slope failure, and ensure overall mining safety in accordance with stable techno-geometrical parameters.</p> <p>The area categorized as "Undisturbed / Mining Rights for Underground (UG) Mining" has been delineated strictly in line with the component-wise land-use classification format prescribed in the</p>	<p>In component wise breakup land use plan User Agency has proposed for mining, underground mining over forest and non-forest area. But, the User Agency in their compliance stated that no underground mining is envisaged as per the approved mining plan</p>

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	<p>map, KML file, subsidence prediction report in this regard may also be submitted.</p>	<p>Approved Mining Plan by the Ministry of Coal.</p> <p>Further, the above categorisation is for land-use accounting and mining rights protection only and shall not be construed as a proposal for underground mining operations under the present project.</p> <p>The area of 219.68 ha, comprising 94.82 ha of forest land and 124.86 ha of non-forest land, has been identified under this component after due consideration of Approved pit geometry, Statutory safety barriers, Batters and slope stability norms, Haul roads and mine infrastructure, Mandatory safety and qualifying limits.</p> <p>It is imperative to mention here that the identified area does not constitute a single contiguous forest patch but represents a cumulative and distributed land requirement essential to maintain the approved mine layout, safety buffers, and regulatory clearances.</p> <p>Any relinquishment, reduction, or exclusion of land under this component would require revision of the Approved Mining Plan, necessitate fresh statutory approvals from the competent authority, and cause procedural delays and disruption of the approved mining sequence.</p> <p>Such modification would compromise the technical integrity and regulatory validity of the sanctioned mining scheme, without yielding any additional forest conservation benefit.</p> <p>Accordingly, it is proposed for retention of this area is essential for ensuring the safe, scientific, and regulation-compliant conduct of mining operations.</p>	<p>which is a contradictory. Further, it is compiled that the land has been kept undisturbed solely to maintain the shape of pit geometry, prevent slope failure and ensure overall mining safety. As per Para-7.4 (iv) (f) of the consolidated guidelines of MoEF&CC, GoI dated 29.12.2023, mining operation and other activities shall be carried out as per the land use allowed in the approval under the adhiniam.</p>

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04	<p>The State Govt. has revised the CA sites after the site inspection has been carried out by the Regional office, Ranchi of the Ministry. Therefore, the RO, Ranchi shall carry out the site inspection of the newly proposed CA sites and will submit its recommendation.</p>	<p>The User Agency shall coordinate with the Regional Office of MoEF&CC, in consultation with the State Forest Department, for field inspection / site visit of the revised Compensatory Afforestation (CA) land for further recommendation.</p>	<p>Regional Office have carried out site inspection on 24-02-2026. During the site inspection it is found that in Mauza-Tasatbar afforestation work has already been done over an area of 10 hectare through another scheme. Therefore, revised KML file, Cadastral Survey map, DGPS Map, Toposheet map for 48.45 hectare of Mauza Tasatbar is being attached with revised cost estimate for CA.</p>


 Divisional Forest Officer
 Latchar Forest Division.

