



RAGA TRADECON PRIVATE LIMITED

NETRABANDHA (WEST) IRON ORE MINES

CIN: U51420MH1995PTC162317

Vill. Bhaliadihi, Ps. Koira, Dist. Sundergarh

Office: 1st Floor, Shyam Residency, Flat No-101, Near Jharpada Jail, Bhubaneswar

Dist: Khurda (Odisha) 751006 E-Mail: ragatradeconminerals@gmail.com

Ref.No. RTPL/NI0B/2023-100

Date: 16.06.2023

To
The Divisional Forest Office,
Bonai Forest Division
Dist – Sundergarh.

Sub: Proposal for seeking prior approval of the Central Government under Section 2 (ii) of the Forest (Conservation) Act, 1980 in favour of M/s Raga Tradecon Pvt. Ltd. for non-forestry use of 66.242 (including 2.09 ha safety zone) ha of forest land for Mining of iron ore within Netrabandha Pahar (West) Iron Ore Block in villages Baldihi and Sanua under Bonal Forest Division of Sundargarh District of Odisha (Online proposal No. FP/OR/MIN/153549/2022).

Ref: (1) File No. 8-14/2023-FC dated 2.05.2023
(2) Your office letter No, 4064 dated 12.05.2023.

Dear Sir

This has reference to the letter on the subject cited above, we would like to inform you that Ministry of Environment, Forest and Climate Change, Govt of India examined our proposal and raised EDS. The pointwise compliance of the EDS as follows: -

- i. **As per approved mining plan the forest area is 52.06 ha, whereas the forest area proposed for diversion is 66.242 ha. This discrepancy is required to be removed.**

In compliance to the above, it is to inform you that the State Govt in their forwarding letter already informed to the Ministry that the Chief Surveyor, O/o the Director of Mines, Odisha, submitted the land schedule of 74.370 ha out of which 52.056 ha forest land and 22.314 ha non-forest land involved in the project in respect of Netrabandha Pahar West block. The Copy of the land schedule is enclosed as **Annexure- I**. Accordingly, the Govt. of Odisha. Steel and Mines department has supplied the DGPS map, land schedule along with LoI. Further, during DGPS survey, it is found that there are discrepancies in the land schedule and hence the User agency requested the Director of Mines to supply the authenticated land schedule. The Director of Mines has provided the authenticated land schedule to the UA vide Memo No.3458 dated 25.04.2022 that the total forest land 163.686 acres or 66.242 ha. The copy of authenticated Land schedule is enclosed as **Annexure-II**.

Soon after getting the LoI, we have prepared the mining plan based on the land schedule wherein forest land was mentioned as 52.056 ha. Hence in the approved mining plan, the extent of forest land was 52.056 ha. However, we have now modified the Mining plan as per the rectified land schedule provided by the Director of Mines. The copy of modified Mining Plan is enclosed herewith in 4 sets for onward transmission to MoEF&CC. The copy of Approved Mining plan is enclosed as **Annexure- III**.

- iv. The copy of the ownership/revenue record and the documentary evidence regarding allotment of Non forest Govt land for the purpose of Compensatory Afforestation shall be submitted.**

In compliance to the above, we are submitting herewith letter of Tahasildar for documentary evidence regarding allotment of Non-Forest land for the purpose of Compensatory Afforestation. The copy of the same is enclosed as **Annexure – IV**.

- v. There are some non-site-specific activities like Waste dump, Mineral stacking yard / Mineral Storage/processing etc. which have been proposed on forest land. The justification for the same shall be provided.**

In compliance to the above, the land-use like Waste dump, Mineral stacking yard / Mineral Storage/processing plant etc has been earmarked in the forest & non forest area in the conceptual plan of Mining Plan. The land use of Forest diversion proposal has been prepared in accordance with the conceptual plan of the mining plan.

Further, As per Rule 12(3) of Mineral Conservation & Development Rule, 2017 which provide that **the holder of a mining lease shall carry out detailed exploration (G-1 level) over the entire potentially mineralised area under the mining lease, within a period of five years from the date of opening of the mine after execution of such mining lease (Annexure- V)**. In the approved mining plan it has been proposed & to carry out 49 nos exploratory borehole during 2nd & 3rd year of mining operation.

It would be pertinent to mention that as per 7.8 (c) of Hand book of Guideline under Forest Conservation Act, 1980 provides that **as per the MMDR (Amendment) Act 2015 & Mineral (Evidence of Mineral content) Rules, 2015, a mining lease can be granted pursuant to ensuring G-2 level of exploration (prospecting) and lessee has to prove the mineral up to G-1 level in next 5 years of time, hence land use in the mining plan should be prepared up to conceptual period and the land use of diversion proposal should be same as land use in the Mining plan. After**

G-1 level of exploration, the mining plan/scheme should be modified accordingly and final land use pattern should be submitted to MoEF&CC for information and record(Annexure-VI). After G-1 level of exploration, we will submit the final land use considering mineralisation zone.

The area earmarked for dumping is 7.403 ha as because during plan period ore will not be exhausted in any place and hence the waste generated during mining operation has to be kept in the external dump. After exhaust of mineral we will not use any forest land for dumping purpose. The area earmarked for storing of minerals is 10.889 ha., Out of which 4.790 ha is for sub-grade ore (45%Fe to 55%Fe) which has no market and it has to be preserved as per Rule 14 – “ **Separate stacking of non-saleable minerals.– (1) All the non-saleable or unusable minerals or ores above the threshold value of the mineral, as may be notified by Indian Bureau of Mines from time to time, or otherwise shall be stacked separately on the ground earmarked for the purpose(Annexure-V):**”

The balance 6.099 ha is for stacking & storing of Minerals. Considering the grade wise and size wise requirement of the consuming industries, the ore raised is to be segregated and stacked separately for sale purpose. Considering from the mineral conservation point of view, the Indian Bureau of Mines, Govt. of India is emphasizing on assessment of the iron ore reserve with the cut-off grade of 45%Fe and stacking of the sub grade ore properly. Presently, the good quality ore is only marketable and the sub-grade ore raised are normally not sold presently, which are required to be stacked separately for the future use. Again for removal of ore from mining lease hold area, stacking of minerals is essential. The State Government vide notification 3973 dated 28.04.2021 have issued operational guideline for Stacking, Sampling & Chemical Analysis. As per the guideline each stack should not be more than 20000 MT and the height should not be more than 3 meter. To accommodate 20000MT, the required surface area is approximately more than 2500Sq.M. Road has to be kept in between the stacks, so considering all the above, area required for each stack is 5000 Sq.M or 0.5 ha. Depending on the placement of Rakes, the average time for removal of one stacks take about a month. We have to dispatch 1 lakh ton of material every month and to achieve the quantity, 7 to 8 nos of stack of different grade and size are required. So minimum 3 ha of land is required for stacking of Ore of processed ore. Again some area is required for un- processed ore. Looking to the above, 10.889 ha has been earmarked for Mineral storage.

However, most of the activities are temporary in nature and under the guidance of MoEF&CC and State Forest department same will be shifted to the area earmarked for mining after exhaust of Minerals.

- vi. Component wise breakup given in online application is not in conformity with that in the approved mining plan. State Govt shall ensure that the proposed component wise land-use is in conformity with the land-use in the approved mining plan. A comparative analysis of the same shall be made and submitted.**

In compliance to the above, we would like to inform you that the format of Mining plan for conceptual land use is not in consonance with the Forest diversion Proposal. We are giving below the comparative analysis as:-

Comparison Table between Mining Plan & Forest Diversion Proposal

	Forest Diversion Proposal	Area in Ha.	Mining Plan	Area in Ha.
1	Mining including mines road and mobile mineral processing unit	43.820	Mined Out area in the Lease	43.820
2	Waste dump with safeguard measures like retaining wall, garland drain and settling pond, check dam etc.	7.403	Area under Dumps (Waste dump, Ore Stack yard & top soil)	7.403+10.889+0.272 = 18.564
3	Mineral stacking yard	10.889		
4	Top Soil	0.272		
5	Road	2.971	Area under utility services (Road+ infrastructure + Entry & Exit road)	2.971+0.010+1.652 = 4.633
6	Entry and exit within safety zone area	0.010		
7	Infrastructure (Office, Magazine, work shop, fuel station, parking plaza & Temp. Top Soil yard etc.)	1.652		
8	Green Belt / Grass Turfing	3.458	Area undisturbed/virgin (Green belt & Safety zone and undisturbed land)	3.458+0.903+2.992 = 7.353
9	Undisturbed Land	0.903		
10	Safety zone around ML boundary	2.992		
Grand Total		74.370		74.370

Copy of the relevant page of Mining plan & modification of mining plan is enclosed as **Annexure-VII & VIII**

- vii. The Cost benefit ratio has been mentioned as 1:814 which is very high. The State govt. shall recheck the same. Further the CB analysis has to be prepared keeping in view the parameters and format prescribed in the FCA Handbook of guidelines.**

In compliance to the above, the CB analysis is 1: 32 and prepared as per the format prescribed in the FCA handbook of guideline. The copy of CB analysis is enclosed **Annexure-XI**.

- viii. All the documents pertaining to Compensatory Afforestation like CA scheme, KML file, DGPS Maps, SOI toposheets etc have not been uploaded on the PARIVESH portal.**

In compliance to the above, all the documents pertaining to Compensatory Afforestation like CA scheme, KML file, DGPS Maps, SOI toposheets etc have been uploaded on the PARIVESH portal.

- ix. The KML file of the proposed area indicating the land use plan /component wise breakup/ mineralized and non-mineralized zonation shall be submitted.**

In compliance to the above, we are submitting herewith the KML file area indicating the land use plan /component wise breakup/ mineralized and non-mineralized zonation. CD is enclosed.

- x. The proposal does not contain the details as to how the requirement of water, electricity and road will be met in the instant case. The mode of transportation has been mentioned as road, however it is not clear whether a new road will be constructed or an already existing road is to be utilized. The detail of additional forest land required (if any) for above shall also be intimated.**

In compliance to the above, we would like to inform you that the CGWA, GoI granted NOC to draw ground water at a tune of 62 Cu.M/day. The DMF road is passing adjoining to our lease hold area and Electric line also passing in the ROW of DMF road. Hence no additional forest land is required for water, road & electricity.

Thanking you,

Yours faithfully,
For Raga Tradecon Pvt. Ltd

LAGA TRADECON PRIVATE LIMITED

Authorised Signatory

Sangram Keshari Ray
(Authorised Signatory)