

PART -V

Recommendations of the State Government

1. WBPDC's proposal for diversion of 338.74 hectares of forest land has been recommended by the DFO, Bankura (North) Division and the CCF, Central Circle, after site inspection and field visits, subject to the formulation of a comprehensive Wildlife Management Plan and a comprehensive Soil Moisture Conservation Plan.
2. The Nodal Officer, Forest Conservation Act, West Bengal has not recommended the proposal primarily based on her concerns relating to the possibility of human-wildlife conflict, and loss of elephant habitat apprehended by her.
3. Since the objections raised by the Nodal Officer, Forest Conservation Act, West Bengal were related to wildlife management, the considered comments of Principal Chief Conservator of Forests, Wildlife & Chief Wildlife Warden, were sought. The PCCF/Wildlife & CWLW, West Bengal who is the final authority on wildlife matters has given his fact-based assessment, and has recommended the proposal (CWLW's Note dated 26/09/23 is appended).
4. Additionally, PCCF & HoFF whose considered opinion was sought, has endorsed the recommendation of the PCCF/Wildlife & CWLW (HoFF's note dated 09/10/23 appended).
5. The specific comments (as detailed in Part-II, Part-III and Part-IV), along with observations made by PCCF/Wildlife & CWLW and PCCF/HoFF WB have been examined in detail, and from them, the following facts emerge:
 - (i) The diversion site, located at the northern-most edge of the forest, is immediately abutting the existing mining site.
 - (ii) There have been no reported human-wildlife depredation casualties in the vicinity of the proposed area.
 - (iii) The proposed area neither forms part of any established route taken by wild elephants to access the river Damodar nor hinders the natural movement of wild elephants.
 - (iv) Elephant habitat has shifted more towards Jhargram and Medinipur, thus indicating least impact on wildlife in the area proposed for diversion.
 - (v) It is seen that forest land proposed for diversion is not part of any recognized elephant corridor, and the diversion of this patch of forest will not have any adverse impact on wildlife.
 - (vi) The forest area proposed for diversion has predominantly low-girth trees. As detailed in Part-II, out of the 67,755 standing trees enumerated in the area proposed for diversion, the majority of the trees (48,581 trees) are in the girth class 31-60 cm.
6. Thus, having considered the comments of the DFO, CCF, Nodal Officer FCA, PCCF/Wildlife & CWLW and the PCCF & HoFF, and especially since this is a "site-specific" project (which

cannot be located/shifted elsewhere), **the State Government recommends the project subject to the following safeguards:**

- (a) Formulation of a comprehensive Wildlife Conservation Plan detailing the best practices to be adopted / implemented for the management of the Barjora micro-habitat.
- (b) Formulation of a comprehensive Soil Moisture Conservation Plan for overall stability of the forest landscape from erosion and for augmenting the water resources in the area.
- (c) Ensuring minimalistic change in the natural drainage system within the proposed forest diversion area.
- (d) Maintaining international standards of coal extraction and following all the environmental norms as maybe specified for this project.
- (e) Maintaining safety zone / buffer zone around the mine area, as per norms.
- (f) Abiding by all such conditions as may be imposed for the reforestation and afforestation efforts for the overall forest ecosystem in the area post-mining operations.



Signature 17/11/23

Name and Designation
(Official Seal)

VIVEK KUMAR IAS
Additional Chief Secretary
Forest Department
Government of West Bengal

**Office of the Principal Chief Conservator of Forests, Wildlife
& Chief Wildlife Warden, West Bengal**

Instructions given vide U.O. No. 77(2)-ACS/For/2023 dated 22/09/2023, may please be referred to. The replies to the questions raised in para 3(a)-(i), are based on hard facts. The field units at the levels of DFO and CCF were asked to give their inputs on these questions vide this office memo no. 2757/WL/2W-167/2016 dated 22/09/2023. The reply received from Chief Conservator of Forests, Central Circle are endorsed by the undersigned.

It is mentioned here that the forest land proposed for diversion is not part of recognized elephant corridor. It is also not a passage that is used by elephants for accessing the river Damodar. The entry and exit to the Barjora elephant micro-habitat also lies on the opposite side of the proposed mining land. Thus, the proposed land diversion is not expected to impact established elephant migration route [para 3(d), (e) and (f)].

There was no human death within five (5) kilometre radius from the proposed mining site in Barjora in last 3 years and the compensation paid against crop damage is a modest sum of Rs. 1,40,160/-. The compensation/ ex-gratia amount of Rs 90.96 lakhs mentioned by the Nodal Officer, FCA is the accumulated dues for three years (2020-21, 2021-22 and 2022-23) for the entire Bankura (North) Division. The above account gives correct picture of the human-elephant conflict in the immediate vicinity of the proposed mining site [para 3(b) and (c)].

The proposed site identified for diversion is part of the Barjora elephant habitat, but it lies at the northern-most edge of the habitat abutting the existing mining site. Citing empirical evidence, the DFO and CCF commented that the elephants are occupying the Barjora micro-habitat irrespective of ongoing mining operations. The land proposed for diversion supports a vegetation whose species composition is typical of Bankura (North) Division except for higher abundance of Mohul and Pial, (two elephant fodder species). The forest land falls in Overlapping Wildlife Management Working Circle. [para 3(a), (g) and (h)].

In the recent years, there is a tendency of elephant herds staying longer period of time in Jhargram and Medinipur compared to Bankura (North) [vide para 3(i)].

Considering the above, it is estimated that the impact of the proposed project could be kept at a manageable level using extraction technology that does not require blasting and adopting the safeguards proposed by Divisional Forest Officer, Bankura (N) Division and Chief Conservator of Forest, Central Circle. The Proposal, therefore, is recommended.


(Debal Ray)

Principal Chief Conservator of Forests, Wildlife
& Chief Wildlife Warden, West Bengal

Memo No. 2767 /WL/2M-167/2016
Dated: 26 / 09 / 2023

PCCF & HoFF, W.B.

Perused the comments of PCCF/Wildlife & Chief Wildlife Warden submitted in response to U.O. No. 77(2)-ACS/For/2023 dated 22/09/2023 along with supporting annexures of Divisional Forest Officer Bankura North Division and Chief Conservator of Forests/Central Circle. The specific recommendations of the DFO/CCF/Nodal Officer in Part II, III & Part IV of the proposal submitted have also been examined.

It is seen that the instant proposal for the diversion of 338.74 hectares of forest land submitted by West Bengal Power Development Corporation Limited (WBPDC) pertains to a forest area which is an Eco Class III Dry Deciduous Forest having predominantly low girth trees. The forest area proposed for diversion is abutting the industrialized belt already present in the northern region of the forest area.

PCCF/Wildlife & Chief Wildlife Warden, West Bengal has explicitly stated that the forest land proposed for diversion is not part of a recognized elephant corridor and diversion of this patch of forest will not have any adverse impact on the wildlife. He has also stated that the proposed site for forest diversion is not used by the elephants for accessing the Damodar river. Furthermore, there are no reported human deaths in near vicinity of the proposed forest diversion site during last three years. It is also indicated that the elephant herds are now occupying other habitats in Jhargram and Medinipur forest areas for longer duration as compared to the Bankura forest areas.

Further consideration is drawn to the fact that coal mining in forest areas is a site-specific activity and many mines being operated in the country are in forest areas. Apart from stimulating economic development in the area, coal mining is essential for the energy security of the country in the present scenario. Striking a balance between the need for development with the preservation of wildlife habitats and the mitigation of human-wildlife conflicts is however crucial for achieving a delicate balance for the sustainable coexistence of industry and nature. Successful integration of coal mining in forested areas while safeguarding wildlife habitats has to have a multi-faceted approach so that a harmonious balance between development and environmental conservation can be achieved.

Therefore, recommendation made by the PCCF/Wildlife & Chief Wildlife Warden is endorsed herewith for taking necessary action at your end.

(Niraj Singhal)

Principal Chief Conservator of Forests
& Head of Forest Force, West Bengal.

Memo No. 6763/L&T/24-1(2)/2023

Dated: 09.10.2023

Addl. Chief Secretary,
Forest Department



Pls process.
9/10/23

S.O. (Shuk)
Pls process
Am 13.10.23
File started
12/10/23