

Government of India
Ministry of Environment, Forest and Climate Change
(Forest Conservation Division)

Indira Paryavaran Bhawan,
Jor Bagh Road, Aliganj
New Delhi: 1100 03,
Dated: January, 2023

To,
The Spl. Chief Secretary (Forests),
EFS & T Department, Telangana Secretariat,
Government of Telangana,
Hyderabad.

Sub: Proposal for diversion of 151.8517 ha. of forest land falling in Yellandu division for proposed JK OC project at Yellandu division in favour of M/s. Singareni Collieries Company Limited. -reg (Online proposal No. FP/TG/MIN/49581/2020).

Sir,

I am directed to refer to the Government of Telangana's letter No.3219/For.I (1)/2022 dated 06.06.2022 on the above mentioned subject seeking prior approval of Central Government under Section-2 of the Forest (Conservation) Act, 1980. After examination of the proposal following shortcomings/observations regarding the proposal are noted.

- i. The State Govt. is requested to submit the component wise (Landuse) KML file and DGPS map of proposed forest area for diversion.
- ii. The State Govt. is requested to submit the KML file of Yellandu mining lease (524.96 ha), Yellandu additional mining lease (1741 ha), JK OC mine (1114.507 ha) and earlier diverted 167.46 ha (124.96 ha + 42.50 ha).
- iii. The State Govt. is requested to submit the KML file of CA land in lieu of 1.5 times of proposed safety zone.
- iv. It was informed that one old Dargah and Burial ground exists in the proposed diversion area, the State Govt. is requested to offer its comments in this regard.
- v. The number of trees to be felled is mentioned as 87451 in DFO's report but in part-II of PARIVESH portal it is mentioned as 17701. In this regard, the State Govt. is requested to provide the exact no. of trees to be felled. Further the State Govt. is also requested to forward the said enumeration report of the no. of trees proposed for felling and the method used for enumeration/estimation may be clarified by the State.
- vi. DFO has suggested for creation of Bamboo brakes of 100 mtrs width but the site suitability certificate for taking up plantation of bamboo in such areas are not submitted along with the required costs and source of funds. The same may be submitted to this Ministry.
- vii. The State Govt. has mentioned some areas for diversion as 3rd diversion, some as 1st diversion and some as fresh. To get an clear idea, the State Govt. is requested to kindly mention the breakup along with the validity for each areas.
- viii. The User Agency in their letter dt 25.04.2021 informed that there is one habitation

namely Vijayalaxmi Nagar consisting of about 105 families in the Non-Forest Land. In this regard, the State Govt. is requested to offer its comments along with proposed action.

- ix. The State Govt. is requested to submit the copy of approved Mining Plan and Mine Closure Plan for the mining lease involved in the instant proposal.
- x. The State Govt. is requested to submit the detailed mining plan of the area 124.96 ha and the plan of State govt. wrt to the balance forest land continued with UG rights i.e. 61.156 ha which is also referred as undisturbed area by State.
- xi. The State govt. is requested to submit the status of mining leases cum mining plans of the JK-5 open cast mine existing in NFL area along with the mining plan of the 21 inclined UG mines which they plan to convert in Open Cast. Further, the State Govt. is also requested to clarify the exact area for which FC is being asked in the instant proposal if it has any overlap/connection with the area of 21 inclined mines. The same may be presented by a Map and relevant KML files may be submitted for further analysis in this Ministry.
- xii. State govt. is requested to forward the EC pertaining to JK5 mine with a clarification regarding conditions laid down in the respective EC wrt the mined out areas or OBD areas and the provision for rehabilitation or greening the same if any. The updated status with respect to the mining closer plan of JK-5 may also be submitted. Further, the details of the area to be used for OBD of the instant proposal in the JK-5 mine may be submitted along with the KML file.
- xiii. The State has submitted that an area of 61.156 ha will be kept undisturbed and continued with UG rights. In this regard, the State govt. is requested to provide the existing mining plan wrt to the referred undisturbed area and is also requested to comment whether there is/will be a separate mining plan for this area.
- xiv. Complete compliance of the Stage-II approval letter no. F. No. 8-260/1985-Fc dt 20.07.2018 w.r.t. diversion of an area of 124.96 ha of forest land in Kothagudem Divison, Khammam District in favour of the M/s SCCL and also compliance report wrt approval letter no. F. No. 8-54/1991-FC(pt) dt 25.07.2008 wrt renewal of an area 42.5 ha of Forest land.
- xv. The Lol dt 15.09.2015 issued by Ministry of Coal (uploaded in PARIVESH portal) is in favour of JK-5 opencast Project (March, 2014) for JK-5 OCP Block, Yellandu Coal Belt, Godavari Valley Coalfield, District Khamman Andhra Pradesh in respect of M/s. SCCL under Section 5(2)(b) of the MMDR Act. 1957 by the Central Government. However the instant proposal pertains to Govt. of Telangana. The State Government may offer its comments in this regard and also on any requirement of new Lol to be issued.
- xvi. The State Govt. is requested to offer its comments on the issues raised by CF, Kothagudem Circle in its Site Inspection Report.
- xvii. While discussing the similar kind of proposal of conversion of UG mines to open cast mines by the same User Agency the FAC on 21.09.22 deliberated that converting the UG mines to Open cast mines fails the motive of encouraging the UG Mines. The UG Mines are encouraged since the vegetation above the soil is not affected. Considering the large area to be diverted and huge number of trees to be felled, biodiversity impact assessment, valuation of ecological/ecosystem services from the said land to be diverted needs to be accounted for. Therefore,

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the State Government is requested to rework C:B analysis report considering adverse effect on the ecological parameters due to conversion of underground mines to open cast mines as per the above observation of FAC and submit a revised C:B analysis report. Further, it is highlighted that the submitted CB report with instant proposal is not duly countersigned and verified by the concerned DFO.

In view of above, the State Govt. is requested to furnish the information/documents as mentioned above to this Ministry for further consideration of the proposal.

Yours faithfully,

(Dr. Dheeraj Mittal)

Assistant Inspector General of Forests

Copy to: -

1. The PCCF & HoFF, Govt. of Telangana, Hyderabad.
2. The Nodal Officer (FCA), Forest Department, Government of Telangana, Hyderabad.
3. The Regional Officer, Integrated Regional Office, MoEF&CC, Hyderabad.
4. The Monitoring Cell, MoEF&CC, New Delhi.
5. User Agency.