

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

Indira Paryavaran Bhawan,
Jor Bag Road, Aliganj,
New Delhi – 110003
Dated: As per E-sign

To,

The Principal Secretary (Forests),
Government of Maharashtra,
Mumbai.

Subject: Diversion of 146.996 ha forest land under section 2 (1) (ii) of the Van (Sanrakshan Evam Samvardhan) Adhiniyam, 1980 for Integrated Coal Mining including post mine reclamation in Marki-Mangli II coal block in Yavatmal District of Maharashtra State in favour of M/s Yazdani International Private Limited (Online No. FP/MH/MIN/145510/2021) - regarding.

Madam/Sir,

I am directed to refer the Government of Maharashtra's letter No. FLD-3223/CR-179/F-10 dated 02.08.2023 on the above subject seeking prior approval of the Central Government under section 2 (1) (ii) of the Van (Sanrakshan Evam Samvardhan) Adhiniyam, 1980 and to say that the competent authority of the Ministry has desired to obtain comments regarding Wildlife Conservation Plan submitted by the State Government.

Further in reference of the Ministry's letter of even no. dated 22.11.2024 and Reminder letter of even no. dated 17.12.2024 the Wildlife Institute of India, Dehradun vide their letter no. WII/AE&CB/BH/Dongargaon-Limestone/281/2024-01 dated 09.02.2025 has submitted their comments on the Wildlife Conservation Plan. The copy of same is **enclosed** for ready reference.

In view of the above, the State Government is requested to incorporate the suggested revisions into the Wildlife Conservation Plan and submit the revised version, duly reviewed and endorsed by WII, Dehradun, for further necessary action.

Yours sincerely,

Encl.: As Above

Sd/-
(Suneet Bhardwaj)
Assistant Inspector General of Forests

Copy to:

1. The PCCF (HoFF), Department of Forest, Government of Maharashtra, Nagpur;
2. The Dy. DGF (Central), Regional Office, MoEF&CC, Nagpur;
3. The Nodal Officer, Department of Forest, Government of Maharashtra, Nagpur;
4. User Agency;
5. Monitoring Cell, FC Division, MoEF&CC, New Delhi for uploading on PARIVESH portal.



भारतीय वन्यजीव संस्थान
Wildlife Institute of India



(An Autonomous Institute under Ministry of Environment, Forest & Climate Change, Govt. of India)
पत्रपेटी सं०/Post Box No. 18, चंद्रबनी, देहरादून/Chandrabani, Dehradun - 248001, उत्तराखण्ड, भारत /Uttarakhand, INDIA

File No. WII/AE&CB/BH/Dongargaon-Limestone/281/2024-01

Dehradun, Date as per E-Sign

To,

The Assistant Inspector General of Forests

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

Indira Paryavaran Bhawan

Jor Bagh Road, Aliganj

New Delhi – 110003

Sub.: Review of the Wildlife Mitigation Plan for diversion of 146.996 ha forest land under section 2 (1) (ii) of the Van (Sanrakshan Evam Samvardhan) Adhiniyam, 1980 for Integrated Coal Mining including post mine reclamation in Marki-Mangali II coal block in Yavatmal District of Maharashtra State in favour of M/s Yazdani International Private Limited (Online No FP/MH/MIN/145510/2021) - regarding

Ref.: 1. Letter No:- D-23(2)/Survey/C.N.149/17/4/2023-24 dated 01/09/2023 from the office of the Principal Chief Conservator of Forests (Wildlife)/Chief Wildlife Warden, Maharashtra State,
2. Letter No. WII/AE&CB/BH/MS-SBWL/2024-01 dated 5th February 2024 from the office of the undersigned,
3. Letters dated 22nd November 2024 and 17th December 2024 from your office.

The Wildlife Institute of India received the Wildlife Mitigation Plan (WMP) for the mining project mentioned in the subject from the PCCF (WL) & CWLW, Maharashtra State (vide letter 1 in reference) for our comments. Subsequently, we submitted our observations on the WMP (vide letter 2 in reference) to CWLW, Maharashtra. Subsequent to this, the WMP was submitted to the Government of Maharashtra, who forwarded the same to the FE Committee.

As per your request to review the revised WMP (vide letter 3 in reference), please find below our observations on the incorporation of WII's comments in the WMP:

S. No.	WII Observations (February 2024)	Remarks on revised WMP
1.	The information furnished, particularly the lists of floral and faunal species, has been taken from literature sources, and not through a field survey. The floral and faunal lists mentioned in the report are not extensive, and omits the protection status of the said species.	The list of faunal species is not comprehensive, includes only large common mammals/birds/herpetofauna, and omits smaller mammals. Further the schedules under which these species are placed are not updated based on the revised WPA, 1972.
2.	Page 13 of the mitigation report states that "there is no reported migratory path of wildlife or bird species of threatened or protected species". However, the mining area falls within the modelled tiger corridor as per WII's publication "Telemetry based tiger corridors of Vidarbha Landscape, Maharashtra, India" published in 2021. Moreover, the list of faunal species omits the mention of the tiger <i>Panthera tigris</i> .	In addition to being covered under the Approved Tiger Conservation Plan of Tadoba Andhari Tiger Reserve, the corridor falls within the modelled tiger corridor as per the publication "Telemetry based tiger corridors of Vidarbha Landscape, Maharashtra, India" published in 2021. The revised version of the WMP again fails to mention this.
3.	The wildlife mitigation report is focused more on the environmental aspects rather than addressing the impacts of the mining operation on biodiversity.	A chapter on impacts of the mine on biodiversity (chapter 5) and one on mitigation measures for wildlife and biodiversity have been added (Chapter 9). However, these chapters lack detailed measures and plans. Further, considering that the mine falls within the corridor area, a management plan

		specifically focused on maintaining the corridor function of the area i.e., maintaining animal movement, is noticeably missing.
4.	As per Section 6.0 of the report titled "Mitigation measures for Environmental Impact", development of a green belt of 7.5 m is suggested to control noise pollution from mining activities. It is to be reiterated that only native species of trees should be considered for development of this green belt.	An adequate list of native species has been provided.
5.	Contamination and pollution of natural water sources: All the mitigation measures suggested for reducing water pollution are to be followed for the existing natural water bodies in the area. In addition to handling and remediation of waste water effluents from the mining activities, water pollution from sources such as those emanating from use of facilities by mine workers should also be checked. Proper sanitation facilities for use by mine workers should be provided, the effluents from which should be discarded away from the mine area.	In addition to measures to control siltation (Page 36 of report), measures to check heavy metal contamination in the wastewater from mining activities should be explicitly provided.
6.	The report should contain a section on boarding camps for mine workers, and it should mention that the workers should not engage in activities that violate provisions of the Wildlife (Protection) Act, 1972. The camps should be located away from the mine area.	In addition to educating workers about wildlife in the area, awareness about legal and illegal activities as per the Wildlife (Protection) Act, 1972 should be created periodically. Further, the report should explicitly state that "Project proponent will make sure that no labour camps are located in the mine area, as well as forest areas surrounding the mine".
7.	Page 17 of the report under the section 7.3 titled "Strategies to mitigate the adverse impacts on wildlife" states that soil moisture and top soil should be conserved. However, no clear directions/measures to do so have been mentioned.	The measures for soil and moisture conservation in the revised WMP are adequate.
8.	Under the same section, the subheading "Restoration of soil dump" states that restoration of slopes should be carried out using fast-growing species with deep root systems and simple propagation, and 'geotextiles' particularly jute. It is to be reiterated that only native species must be used for this purpose.	The revision is adequate.
9.	The area of the corridor diverted for the mine should be reclaimed/restored as part of the assisted natural regeneration and plantation of native species activities proposed by the mitigation plan.	The revision is adequate.
10.	Waterholes proposed as part of the mitigation plan must be situated away from the mine area.	The revision is adequate.

11.	Under the section "Recycling and reuse of mine water", it is stated that mine water can be reused. It is to be emphasised that the waste water would need to be tested as being fit to be used for the mentioned purposes.	In addition to checking siltation, the water from sedimentation tank should be tested for heavy metals and sulphides, as the proponents plan to use the water for green belt development. If unchecked, the heavy metals and other pollutants may leach into the groundwater.
12.	Overall, the wildlife mitigation plan does not set out clear directives to mitigate the impacts of the mine on wildlife. Moreover, there is no mention of how obstruction to the corridor function of the forest where the mine is proposed would be maintained during the mining operations.	Measures for maintaining the corridor for movement/dispersal of wildlife is missing from the revised report.

The following additional observations regarding the revised wildlife mitigation plan have been made:

1. Under heading "Waste Management" on Page 34 (Chapter on Mitigation Measures for Environmental Impact), the various types of wastes anticipated to be generated have been listed. However, an explicit plan to manage this waste is missing.
2. In Annexure 6 (Financial Provision for Mitigation of Impact on Wildlife due to Mining Activity), adequate budgetary provisions for repair and maintenance of the chain-link fence (SN 1) and cattle trenches (SN 2) should be made for subsequent years as well (e.g., on 3rd and 5th year) to ensure the effectiveness of the measures.
3. Plantation of edible/fruited trees for herbivores should not be done too close to the mining area (Section "Plantation in Buffer Zone" Page 37).
4. There is no mine closure plan, and details of previous mines (closed or functional) in the area, if any.

Since the area falls under a designated wildlife corridor, a comprehensive mitigation plan is desired, including clearance from NBWL. The recommendations mentioned above may be considered in the Wildlife Mitigation Plan.

Thanking you.

Signed by
Virendra Rambahal Tiwari
Date: 09-02-2025 13:48:27
(Virendra Tiwari)
Director

Copy to:

1. The Principal Chief Conservator of Forests (Wildlife)/Chief Wildlife Warden, Maharashtra State
Email: pccfwlngp@mahaforest.gov.in
2. The Additional Principal Chief Conservator of Forests (Wildlife) East, Nagpur
Email: apccfwlnagpur@mahaforest.gov.in