

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 Madhya Pradesh,
Bhopal.

Subject: Proposal for seeking prior approval of the Central Government under Section 2 (1) (ii) of the Van (Sanrakshan Evam Samvardhan) Adhiniyam, 1980 for diversion of 19.00 ha Reserve forest land for open cast Mining of Pyrophilite/diaspore in Compartment No. RF-262, Range Jatara, Tikamgarh District of Madhya Pradesh State in favour of M/s Khajuraho Minerals Pvt. Ltd. (Online No. FP/MP/MIN/35835/2018) - regarding.

Madam/Sir,

I am directed to refer to the Government of Madhya Pradesh's letter No. F-1/FP/MP/MIN/35835/2018/1805 dated 30.05.2019 on the above mentioned subject, seeking prior approval of the Central Government under Section 2 (1) (ii) of the Van (Sanrakshan Evam Samvardhan) Adhiniyam, 1980 received via e-file from RO, Bhopal in the Ministry on 12.02.2025. In this regard, following shortcomings have been observed in the information submitted by the State Govt.:

- i. The State Government shall clarify whether the Letter of Intent (LoI) issued by the Mineral Resource Department, Govt. of Madhya Pradesh vide letter No F3-25/2018/12/1 dated 04.07.2018, which was valid for six months, is still valid as of the current date for the same user agency, and shall also submit the status of the mine lease validity along with the relevant details.
- ii. Complete copy of an approved mining plan needs submission. The State Govt. shall also ensure that the land-use as proposed in the proposal shall invariably commensurate with the land-use as given in the approved mining plan.
- iii. It is learnt that the Mineral Resource Department, Govt. of Madhya Pradesh vide its letter No F3-25/2018/12/1 dated 04.07.2018 had issue the Letter of intent (LoI) for the forest area of P-262 whereas the State Govt. in their covering letter informed that the lease is in RF-262. Therefore, correct and factual documents in this regard needs submission.
- iv. The details of mineral evacuation plan and how the requirements of electricity and water will be met shall be submitted. The detail of additional forest land (if any) required for the purpose shall also be submitted.
- v. The user agency in Part-I form reported that the Project does not requires Clearance under the Environment (Protection) Act 1986 (Environmental clearance) whereas the instant project is for mining. A clarification in this regard needs submission.

- vi. The instant mine has been proposed to be worked upon by mechanized mining with implementation of Open-cast technology. Therefore, the status of muck disposal plan shall be submitted along with relevant details.
- vii. The State Govt. has not informed as to how much area of the proposed NFL (village wise/ patch wise) for raising compensatory afforestation is having specified density as per the Rule-13 of the Van (Sanrakshan Evam Samvardhan) Rules, 2023. Moreover, the State shall also ensure that the area (NFL) proposed for CA is suitable for raising Compensatory Afforestation as per the provisions of Van (Sanrakshan Evam Samvardhan) Rules, 2023 and the crop improvement programme of the forest crop in the NFL proposed for CA shall be submitted.
- viii. Para 2, Rule-13 of the Van (Sanrakshan Evam Samvardhan) Rules, 2023 says that "Provided that in case the non-forest land or portion thereof provided by the user agency is not fit for raising compensatory afforestation of a specified density, then additional compensatory afforestation shall be raised on a degraded notified or unclassified forest land under the management control of the Forest Department which is twice in size of such shortfall in the given compensatory afforestation land and the user agency shall also bear the additional cost on such account". Keeping this in view, the KML file of the Degraded forest land which is twice in size of such shortfall in the compensatory afforestation land needs to be submitted (if applicable) along with Maps, CA scheme, Site suitability certificate etc.
- ix. Given the density of 0.4 of the proposed forest area of 19 ha, number of project affected trees reported as 967 appears to have been estimated on lower side. The same needs to be reconfirmed by the State. It may also be clarified whether the tree enumerations have been done as per actual standing trees on ground or through sampling method.
- x. The State Govt. in online Part-II reported that the proposed forest land is not prone to soil erosion whereas as depicted through satellite imagery the lease is situated at hilly terrain. The same may be reexamined and factual position be intimated..
- xi. The forest land proposed for diversion is located in Tikamgarh District whereas the land proposed CA has been proposed in the Chhatarpur District at an aerial distance of approximately 76 Km away from the land for CA. The State Govt. shall ensure that the area proposed for CA is suitable in view of the Para 2.2 (xiii) of Chapter-2 given in the consolidated Handbook of Guidelines issued under the Van (Sanrakshan Evam Samvardha) Rules-2023.
- xii. The KML files indicating the different components of the projects like safety zone/ Green belt, Infrastructure, OB dump etc shall be submitted along with land use map. The component wise details of the proposed forest land shall also be updated on the PARIVESH portal.
- xiii. DSS analysis shows the presence of Jamnara Nala flows through the proposed forest land for diversion and a small earthen dam is also situated at a distance of 105.07 meter from the boundary of proposed forest land for diversion. The Nala is near the outer boundary of the mining lease, therefore the State shall explore the possibility of retaining the Nala as undisturbed. In case it is not feasible the justification for the same shall be provided. The copy of NoC from the Water Resource Department, Govt. of Madhya Pradesh

also needs submission.

- xiv. DSS analysis revealed that the user agency has uploaded incorrect KML file of the Non-forest land proposed for CA because the shape and extent of CA land as shown in the DGPS map is found varying in the KML file.

Accordingly, it is requested to furnish the above mentioned information to this Ministry for further consideration of the proposal.

Yours sincerely,

Sd/-

(Suneet Bhardwaj)

Assistant Inspector General of Forests

Copy to:

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