

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

Indira Paryavaran Bhawan,
Jor Bag Road, Aliganj,
New Delhi – 110003
Dated: March, 2024

To,

The Principal Secretary (Forests),
Government of Madhya Pradesh,
Bhopal.

Subject: Diversion of 40.468 ha forest land in village Phadki (Mohgaon) for Bauxite mining and various construction activities in favour of M/s Dharamji Morarji Chemical Company Limited (Mumbai) in the Balaghat district of Madhya Pradesh State (Online No. FP/MP/MIN/23750/2017) – regarding.

Madam/Sir,

I am directed to refer to the APCCF (LM) and Nodal Officer, FCA, 1980, Govt. of Madhya Pradesh letter No. F-1/FP/MP/MIN/23750/2017/1254 dated 23.02.2024 on the above cited subject. The examination of the same has revealed the following shortcomings:

- i. The State Govt. was requested to submit the approved mining plan involving the entire 40.468 ha forest land in the instant mine. However the same has not been submitted and needs submission. Further, the State shall ensure that the component wise area proposed for diversion is commensurate with the approved mining plan.
- ii. As per the Site inspection Report of Regional Office, Bhopal it has been reported that since more than 6.5 years have already elapsed after the enumeration, a fresh enumeration may be required to ascertain the actual no. of trees, species and girth wise proposed to be felled. Therefore the State Govt. shall submit fresh tree enumeration details.
- iii. As per the Site inspection Report of Regional Office, Bhopal it has been reported that majority of the area proposed for CA contains natural vegetation (**Copy enclosed**). In case of such areas a programme for improvement of the forest crop is required to be submitted as per rules.
- iv. The State has submitted the reply of the user agency without any comments or verification of the fact that the area proposed for Compensatory Afforestation is Non Forest Land. In this regard, the State Nodal Officer shall

submit a certificate that the area proposed for compensatory afforestation is Non-forest land(NFL).

- v. The user agency/state was asked to submit the KML file as per the component wise details given in online part-I, however the same has not been submitted. Instead a map has been submitted, however the details given in the said map are at variance with the component wise plan e.g the mineable area as per the component wise detail is 28.035 ha, whereas in the map the Net proposed Mining area has been mentioned as 29.477 ha. The State shall therefore submit the correct component wise map and KML file for the proposed area.
- vi. As per the component wise breakup mentioned in online Part-I, the total broken forest area reported as 6.07 ha whereas the same has been mentioned in the Mining plan as 3.066 ha. A clarification was sought from the state, however the State has not submitted satisfactory reply in this regard. The same needs submission.

In view of the above, the State Government is again requested to furnish the above mentioned information to this Ministry for further consideration of the proposal.

Signed by
Suneet Bhardwaj
Date: 22-03-2024 10:39:38

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 (FCA), 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.



सत्यमेव जयते

भारत सरकार / GOVERNMENT OF INDIA
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE
क्षेत्रीय कार्यालय, भोपाल/ REGIONAL OFFICE, BHOPAL
Kendriya Paryavaran Bhavan, Link Road No.3, E-5, Ravi Shankar Nagar,
BHOPAL - 462016 (M.P.)
TEL: 0755-2466525 E-mail: rowz.bpl-mef@nic.in



File No. 6-MPA001/2024-BHO/299

Dated: ~~23/02/2023~~

23/02/2024

To,

The Additional Director General of Forests (FC)
Ministry of Environment, Forest & Climate Change
Indira Paryavaran Bhawan
Jor Bagh Road, Aliganj
New Delhi - 110 003.

Sub: Site Inspection for diversion of 40.468 ha forest land in village- Phadki (Mohgaon) for Bauxite mining and various construction activities in favour of M/s Dharamji Morarji Chemical Company Limited (Mumbai) in the Balaghat district of Madhya Pradesh State (*Online proposal No. -FP/MP/MIN/23750/2017*)-reg.

Ref: MoEF&CC, New Delhi Letter No. 8-10/2021-FC (pt.) dated 02/02/2024.

Sir,

With respect to the subject and reference cited above, the Site Inspection Report of Regional Office, Bhopal in respect of 40.468 ha forest land in village- Phadki (Mohgaon) for Bauxite mining and various construction activities in favour of M/s Dharamji Morarji Chemical Company Limited (Mumbai) in the Balaghat district of Madhya Pradesh is submitted herewith for further necessary action.

Yours faithfully

Encl : As above.

(A.K. Sinha)

Dy. Director General of Forests (C)

Copy to:

Shri Suneet Bhardwaj, AIGF, Ministry of Environment, Forest & Climate Change (FC Division), Indira Paryavaran Bhawan, Jor Bag Road, Aliganj, New Delhi.

Field Inspection Report of A.K. Sinha, IFS, DDGF (C), RO Bhopal

Ref: GoI, MoEF&CC (FC Division), letter No. 8-10/2021-FC, Dated- 02 February, 2024.

Date of Inspection: 12/02/2024.

Officers present at the time of inspection:-

1. A. K. Sinha, Dy. Director General of Forests (C), Regional Office, MoEF&CC, Bhopal.
2. Shri Abhinav Pallav, DFO Balaghat (North).
3. Shri Kandarp Bhatt, FRO Baihar (West).
4. Shri, Surjeet Yadav, FBO Mohgaon.
5. Shri, Akhilesh Malvi, representative of Project Proponent.

Title of the Project:		Diversion of 40.468 ha forest land in village Phadki (Mohgaon) for Bauxite mining and various construction activities in favour of M/s Dharamji Morarji Chemical Company Limited (Mumbai) in the Balaghat district of Madhya Pradesh State. (Online proposal No. FP/MP/MIN/23750/2017)					
1.	Legal status of the forest land proposed for diversion:	Reserved Forest: 40.468 ha					
2.	Item-wise break-up details of the forest land proposed for diversion:	The proposed area for Open Cast Mining in Balaghat District.					
		No.	Component	Name of Forest Division	Range	Forest Compartment no.	Area (ha)
		1.	Site Services	North Balaghat	West Baihar	RF-1491	0.267
		2.	Dumping				0.416
		3.	Stacking				0.312
		4.	Parking				0.567
		5.	Old broken area				6.07
		6.	Path and Road				1.442
		7.	Minable Area				28.035
		8.	Non Minable area				1.442
		9.	Barrier Zone				1.917
		Total					40.468

3.	Whether proposal involves any construction of buildings (including residential) or not. If yes, details thereof:	No
4.	Total cost of the Project at present rates:	Rs. 40400 Lakhs (As per online Part-I)
5.	Wildlife:	Leopard, Bear, Sambhar, Spotted deer, Jackal, Langur, etc.
6.	Vegetation:	<p>Eco-Class:-3 and Crown Density is 0.4 to 0.6</p> <p>The main species found in the area are as follows :-</p> <ul style="list-style-type: none"> i. <i>Pterocarpus marsupium</i> ii. <i>Dendrocalamus strictus</i> iii. <i>Terminalia tomentosa</i> iv. <i>Anogeissus latifolia</i> v. <i>Mitragyna parvifolia</i> vi. <i>Adina cordifolia</i> vii. <i>Dalbergia latifolia</i> viii. <i>Diospyros melanoxylon</i> ix. <i>Albizia odoratissima</i> x. <i>Lagerstroemia parviflora</i> xi. <i>Other misc. Species</i>
7.	Background note on the proposal:	<p>The area proposed for renewal of mining lease was prospected by pitting during the past lease period. The Mines were first broken in 1978 even before the FCA-1980 was in existence and that the requisite permissions were taken from the forest department apart from the allocation of the area for Bauxite mining from the relevant authorities. Before the FCA-1980 came into existence, an area of 6.07 Ha had already been broken for Bauxite mining. Before breaking the area and even after, explorative mining were being carried out as per accepted norms. Results of the aforementioned explorative mining clearly indicate that the mine fall under A-category and the feasibility axis for the same falls under UNFC as the deposit is F-1. Main contents of mineral are Al₂O₃ and SiO₂ with presence of Fe₂O₃ as an impurity. Bauxite of the lease area is of chemical and refractory grade.</p>

8.	Compensatory Afforestation:	As per online Part-II				
		No	District	Village	Khasra No.	CA Area (Ha)
		1.	Balaghat	Khursitola	17/3, 7/1, 18/2, 25/2, 25/3, 11/2, 11/3, 26/2, 6/5, 6/3, 6/4 & 31	27.49
		2.	Balaghat	Dorli	15 & 16	13.339
		Total				40.82
9.	Whether proposal involves violation of Forest (Conservation) Act, 1980 or not. If yes, a detailed report on violation including action Taken against the concerned officials:	No				
10.	Whether proposal involves rehabilitation of displaced persons. If yes, whether rehabilitation plan has been prepared by the State Government or not:	No				
11.	Reclamation Plan: (If applicable, submit details and Financial allocation:	It is included in the approved mining plan.				
12.	Details on catchment and command area under the project:	Not applicable.				
13.	Cost benefit ratio:	1:2.07 (as per online Part-I)				

14.	Recommendations of the Principal Chief Conservator of Forests/State Government:	The proposal is recommended by the Addl. Principal Chief Conservator of Forests and the State Government in Part-IV & Part-V respectively.
15.	Utility of the Project:	The project will supplement the requirement of Bauxite for industrial use apart from generating employment opportunity in the area for local people.
16.	Whether land being diverted has any socio cultural/religious value:	No.
17.	Situation w.r.t. Any P.A.	The buffer and Core zone of Kanha National Park are at a distance of 12.2 km and 18.6 km respectively from the proposed site
18.	Any other information relating to the Project:	-

19. Specific comments/ observation of inspecting officer

Date of Inspection: 12/02/2024

Inspection of the proposed diversion area

Range-West Baihar; Beat-Mohgaon; Comp. No. RF-1491

The area was observed to have excellent miscellaneous forest of density 0.6 or more in the areas abutting to the approach road. The terrain of the area was hilly. The break-up of the area proposed for diversion is as shown in column no. 02.

It was observed that there existed a road leading to top of the hill where the mining is proposed. The same road was used for reaching up to the mining site. The KML of the proposed diversion area for road, coincided with the same. It was a Jeepable track. Since, the road is an existing one and the width of the road proposed is only 04 meter, the proposed road is almost coinciding with the existing track and hence very less number of tree felling is involved in making the road. The no. of trees proposed to be felled is only 43 in the total length of 3643 meters of the road. The whole path leading to the top of hill is full of good quality Bauxite ore.

After reaching at the top of hill which is the proposed mining area, it was observed that the topography is plain. At one corner of the proposed area for diversion, old mining area was seen. Small heaps of excavated bauxite ore were also found to be stacked at few places. It was further observed that there was hardly any overburden and the ore has only to be broken, lifted and transported. As informed by Project Proponent the method of mining would be by open cast

method, with rock breaking without the use of explosives. The transportation of ore would be by trucks. There is not much dumping of overburden is involved. However, if required the dumping of overburden would be internal for which the area proposed for diversion is 0.416 ha.

The wildlife and vegetation found in the area is as shown in column no. 05 & 06 respectively.

The canopy density in the mining area proposed for diversion is 0.4 to 0.6. It was observed that the enumeration was carried out on 08/05/2017 and a total of 10,768 trees were proposed for felling.

Since more than 6.5 years have already elapsed after the enumeration, a fresh enumeration may be required to ascertain the actual no. of trees, species and girth wise proposed to be felled. Also the felling of trees should be taken up in phased manner as per requirement after start of mining operations in the area.

Inspection of CA areas

- (i) Range : Baihar (West) Beat – Bagoli
Area – 5.34 ha Khasra No. – 31
Sub-DFO – Shri Rakesh Sukynwar
Forest Beat Officer –Shri Razak Khan

The area was undulating with a lot of natural vegetation. It had very good soil condition with considerable depth. It was a private land, purchased by the User Agency and the same is proposed to be transferred to the Forest Department for raising CA. The main species found were: (i) Lagerstroemia parviflora (ii) Buchnanian lanzan (iii) Butea monosperma (iv) Diospyros melanoxylon (v) Ficus bengalensis (vi) Carex arborea etc.

The area is also abutting to the reserve Forest. The area had so much of natural vegetation that only about 1.5 ha area could be planted in the whole plot. Therefore, for the balance 3.84 ha, the plantation need to be taken up in degraded forest area. **Therefore the DFO is advised to identify a suitable DFL and prepare CA Scheme along with KML file. The same shall be submitted/uploaded. Overall the area is found suitable for raising CA plantation.**

- (ii) Range : Baihar (West) Beat – Bagoli
Area – 15.132 ha Khasra No. – 31
Sub-DFO – Shri Rakesh Sukynwar
Forest Beat Officer –Shri Razak Khan

The area was undulating with a lot of natural vegetation. It had very good soil condition with considerable depth. It was a private land, purchased by the User Agency and the same is proposed to be transferred to the Forest Department for raising CA. The main species found were: (i) Lagerstroemia parviflora (ii) Buchnanian lanzan (iii) Butea monosperma (iv) Diospyros melanoxylon (v) Ficus bengalensis (vi) Carex arborea etc.

The area is also abutting to the reserve Forest and only about 30 % of the area could be planted in the whole plot as there is existence of excellent natural vegetation and root stock in the area. Therefore, the balance number of plants may be planted in a suitable degraded forest area. **The DFO is accordingly advised to identify a suitable DFL and prepare CA Scheme along with KML file. The same shall be submitted/uploaded.**

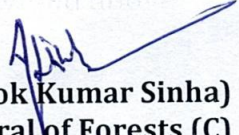
It was observed that in certain portion of the proposed CA land, agriculture was being practiced. The representative of the project proponent informed that as the land was purchased one, the practice of agriculture would be evicted as and when required. It was also observed that a stream was flowing through the area and a road with culvert over the stream was crossing the proposed CA area. It is advised to construct a few check Dams across the stream at suitable locations for impounding water. The same would be useful for wildlife and also for watering the plants. **Overall the area is found suitable for raising CA plantation.**

- (iii) CA area 13.339 ha.
Range - North Lamta
Beat - Badgaon
Khasra No. - 15 & 16

The area was mostly plain with gentle gradient. It has a lot of excellent natural vegetation. The soil was sandy loam with lot of clay content and excellent depth. It was a private land, purchased by the User Agency and the same is proposed to be transferred to the Forest Department for raising CA. The area is abutting to a reserve forest (RF comp. no.-1294). The main species found were: (i) Lagerstroemia parviflora (ii) Buchnanian lanzan (iii) Butea monosperma (iv) Diospyros melanoxylon (v) Ficus bengalensis (vi) Carex arborea etc. An excellent regeneration of Holarrhena antidysenterica was found in the area.

The vegetation in the area was looking like a natural forest and therefore only about 2.5 ha area could be planted in the whole plot. As per guidelines, at least 1000 plants per ha need be planted. Therefore in the instant case the balance number of plants have to be planted in DFL. **Therefore the DFO is advised to identify a suitable DFL and prepare CA Scheme along with KML. The same should be submitted/uploaded.** There was a suitable location for digging a percolation tank, the same should be included in the CA scheme as a part of SMC works. The impounded water in the tank would be useful for the wildlife in the area. **Overall the area is found suitable for CA.**

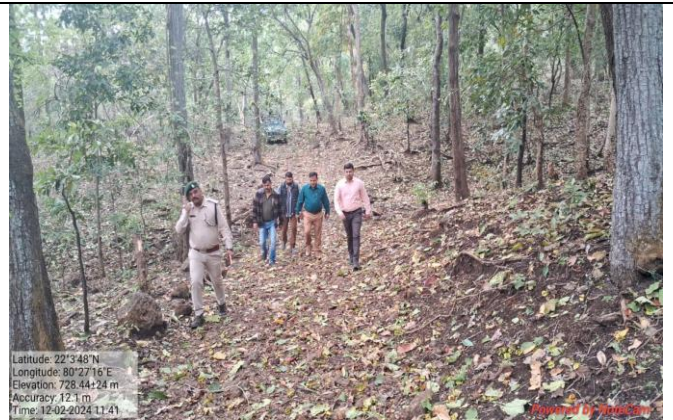
20	Recommendations Of Regional Deputy Director General of Forests (C) along with detailed reasons:	Recommended for Approval subject to the observation contained in the inspection note provided above.
21.	Regional Head shall give detailed comments on whether there are any alternatives routes/alignments for locating the project on the non-forest land:	


(Ashok Kumar Sinha)
Dy. Director General of Forests (C)
Regional Office, Bhopal

Field Photographs



Proposed Diversion Area for Mining



Proposed Diversion Area for Approach road



Proposed Area for CA