

FIELD INSPECTION REPORT OF RAJESH DARADE, IFS AIGF (C),
RO BHOPAL

Ref: GoI, MoEF&CC (FC Division), letter No. 8-145/2006(FC), Dated- 19th January, 2026.

Date of Inspection: 17 & 18 February, 2026

Officers present at the time of inspection: -

1. Rajesh Darade, Assistant Inspector General of Forests (C), Regional Office, MoEF&CC, Bhopal.
2. Shri David VyankatraoChanap, DFO Anuppur
3. Shri Harish Tiwari, Forest Range Officer
4. Shri Manoj Bishnoi, Area General Manager, Hasdeo Area, M/s SECL
5. Shri Rajesh Roy, Sub Area Manager, Rajnagar, M/s SECL
6. Shri Hanuman Prajapati, Survey Officer, Rajnagar UG mine, M/s SECL
7. Shri Rajat Jindal, Nodal Officer (E&F) Hasdeo Area
8. Shri Amrit Tiwari, Dy. Manager (Environment) M/s SECL

Title of the Project:	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 354.258 ha of forest land/revenue forest land (314.743 ha of forest land +39.515 ha of revenue forest land - 354.258 ha forest land) for Jhiria West Opencast Coal Mining in favour of M/s South Eastern Coal Fields Limited, Anuppur district State of Madhya Pradesh (Online No FP/MP/MIN/39881/2019)	
Pursuant to letter from MoEF&CC No.: 8-14/2020-FC (E- 140165) dated 19-01-2026, wherein the Regional Office Bhopal was requested to submit the detailed report on the subject proposal along with the SIR of the Rajnagar RO Underground mine of the South Eastern Coalfield Limited (SECL) titled “ 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 502 ha of forest land for renewal of lease for Rajnagar RO Underground Coal Mining Project in Anup-Nagar District of Madhya Pradesh in favour of M/s South Eastern Coalfield Limited and also diversion of 123.56 ha forest land (a part of 502.00 ha) for surface use for the same project” Proposal No: FP/MP/MIN/1384/2006), the site inspection was carried out and the details are provided as below:-		
1.	Legal status of the forest land proposed for diversion FP/MP/MIN/1384/2006:	Reserved Forest Land: 323.349 ha Protected Forest Land: 178.651 ha Total: 502.00 Ha

2.	Item-wise break-up details of the forest land proposed for diversion:	<p>The entire 502.00 ha Forest land proposed for diversion is required for underground mining. In addition 123.56 ha forest land (a part of 502.00 ha) is required for surface use</p> <table border="1" data-bbox="690 359 1442 762"> <thead> <tr> <th>Sr. No.</th> <th>Details of work</th> <th>Area in Ha</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Railway Siding</td> <td>18.336</td> </tr> <tr> <td>2</td> <td>Residential Colony</td> <td>8.526</td> </tr> <tr> <td>3</td> <td>Construction of Magazene</td> <td>0.700</td> </tr> <tr> <td>4</td> <td>Mining Work</td> <td>43.643</td> </tr> <tr> <td>5</td> <td>Mining Work</td> <td>36.587</td> </tr> <tr> <td>6</td> <td>Residential Colony</td> <td>6.359</td> </tr> <tr> <td>7</td> <td>6A/6B Incline</td> <td>3.326</td> </tr> <tr> <td>8</td> <td>Stadium (Fresh proposal)</td> <td>6.090</td> </tr> <tr> <td colspan="2">Total</td> <td>123.567</td> </tr> </tbody> </table>	Sr. No.	Details of work	Area in Ha	1	Railway Siding	18.336	2	Residential Colony	8.526	3	Construction of Magazene	0.700	4	Mining Work	43.643	5	Mining Work	36.587	6	Residential Colony	6.359	7	6A/6B Incline	3.326	8	Stadium (Fresh proposal)	6.090	Total		123.567
Sr. No.	Details of work	Area in Ha																														
1	Railway Siding	18.336																														
2	Residential Colony	8.526																														
3	Construction of Magazene	0.700																														
4	Mining Work	43.643																														
5	Mining Work	36.587																														
6	Residential Colony	6.359																														
7	6A/6B Incline	3.326																														
8	Stadium (Fresh proposal)	6.090																														
Total		123.567																														
3.	Whether proposal involves any construction of buildings (including residential) or not. If yes, details thereof:	<p>Yes</p> <table border="1" data-bbox="690 835 1430 1266"> <thead> <tr> <th>Sr. No.</th> <th>Details of work</th> <th>Area in Ha</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Railway Siding</td> <td>18.336</td> <td>Existing</td> </tr> <tr> <td>2</td> <td>Residential Colony</td> <td>8.526</td> <td>Existing</td> </tr> <tr> <td>3</td> <td>Construction of Magazene</td> <td>0.700</td> <td>Existing</td> </tr> <tr> <td>4</td> <td>Residential Colony</td> <td>6.359</td> <td>Existing</td> </tr> <tr> <td>5</td> <td>6A/6B Incline</td> <td>3.326</td> <td>Existing</td> </tr> <tr> <td>6</td> <td>Stadium (Fresh proposal)</td> <td>6.090</td> <td>Existing</td> </tr> </tbody> </table>	Sr. No.	Details of work	Area in Ha	Remarks	1	Railway Siding	18.336	Existing	2	Residential Colony	8.526	Existing	3	Construction of Magazene	0.700	Existing	4	Residential Colony	6.359	Existing	5	6A/6B Incline	3.326	Existing	6	Stadium (Fresh proposal)	6.090	Existing		
Sr. No.	Details of work	Area in Ha	Remarks																													
1	Railway Siding	18.336	Existing																													
2	Residential Colony	8.526	Existing																													
3	Construction of Magazene	0.700	Existing																													
4	Residential Colony	6.359	Existing																													
5	6A/6B Incline	3.326	Existing																													
6	Stadium (Fresh proposal)	6.090	Existing																													
4.	Wildlife:	<p>The main species found in the area are as follows: -</p> <ul style="list-style-type: none"> i. Hyaena ii. Vulpes vulpes iii. Canis aureus iv. Ursus arctos v. <i>Semnopithecus entellus</i> vi. Lepus europaeus vii. Sus scrofa viii. <i>Other Species</i> 																														
5.	Vegetation:	<p>The main species found in the area are as follows: -</p> <ul style="list-style-type: none"> i. <i>Shorea robusta</i> ii. <i>Pterocarpus marsupium</i> iii. <i>Diospyros melanoxylon</i> 																														

		<p>iv. <i>Eucalyptus globulus</i></p> <p>v. <i>Other misc. Species</i></p>
6.	Background notes on the proposal:	<p>Rajnagar RO UG Colliery of M/s South Eastern Coalfields Limited (SECL) Is located Anuppur district of Madhya Pradesh and about 5 km west of Manendragarh Railway Station, Chhatisgarh on the Anuppur-Chirmiri section of South Eastern Railway. The colliery contains five extractable coal seams namely Seam 10B, Seam 8A2, Seam 7A1, Seam 5A (Top) and Seam 4A in ascending order.</p> <p>These seams are lying within shallow depth of cover within the leasehold area of the colliery These seams were accessed through inclines from different locations.</p> <p>NIT Rourkela done the scientific study for subsidence prediction of Rajnagar RO UG Colliery, Hasdeo Area, SECL" Three-dimensional (3) numerical modelling including available empirical approaches and field study have been used for prediction of surface subsidence considering existing geo-mining conditions of the colliery.</p> <p>The drainage of the area is mainly controlled by NE-SW flowing KulhariaNalla Apart from this, a number of seasonal nalla flow into the KulhariaNalla.</p>
7.	Compensatory Afforestation:	<p>In accordance with Condition No. 2(i) of the Stage-I approval dated 10-01-2008, Compensatory Afforestation (CA) has been submitted by the User Agency, which has been forwarded to the Government of India via SG office's letter dated 19-12-2024.</p> <p>An order has been issued by the Tehsildar, Bijuri, regarding the mutation of the CA land (non-forest land) being provided by the User Agency in favour of the SECL Hasdeo Area.</p>
8.	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:	<p>Yes</p> <ol style="list-style-type: none"> 1. Residential Colony 2. Stadium
9.	Whether proposal involves rehabilitation of displaced persons. If yes, whether rehabilitation plan	No

	has been prepared by the State Government or not:	
10.	Reclamation Plan: (If applicable, submit details and Financial allocation:	Reclamation plan is included in approved mining plan.
11.	Recommendations of the Principal Chief Conservator of Forests/State Government:	Recommended
12.	Utility of the Project:	The project involves the development of an underground coal mine, with the extracted coal primarily intended for captive use in thermal power plants and cement industries. A portion of the coal production is also proposed for commercial open market sale. The commencement of coal mining operations in this coal block is expected to create employment opportunities for local people, and there is a strong possibility of social and economic development in the nearby areas of the coal block.
13.	Whether land being diverted has any socio cultural/religious value:	No.
14.	Situation w.r.t. Any P.A.	Proposed area is neither a part of any protected area nor it falls in any notified Tiger Corridor. Proposed area is situated at a distance of approx. 47.47 km from Bandhavgarh-Achnakmar Tiger Corridor boundary.
15.	Any other information relating to the Project:	
19.	Specific comments/ observation of inspecting officer	
<u>INSPECTION OF THE PROPOSED DIVERSION AREA</u>		
Date of Inspection: 17 & 18 February, 2026 Forest Division-Anuppur Range- Kotma Area-502.00 Ha (123.567 ha a part of 502.00 Ha)		

The entire 502.00 ha Forest land proposed for diversion is required for underground mining. In addition to this, 123.56 ha forest land (a part of the 502.00 ha) is required for surface use with the following detail mentioned in column no. 02.

During the site inspection, the discussion held with the forest staff and representative of SECL. The proposal was granted Stage-I approval vide MoEF& CC letter no. 8-145/2006-FC dated 10.01.2008 (Annexure-I).

The conditions of the said approval are as follows:

Sr. No.	Conditions	Remarks
i.	Compensatory Afforestation shall be raised and maintained over non-forest land equal in extent to the forest land proposed to be diverted (i.e. over 123.56 ha.). The User Agency shall transfer the cost of Compensatory Afforestation and its maintenance to the State Forest Department.	In accordance with Condition No. 2(i) of the Stage-I approval dated 10-01-2008, Compensatory Afforestation (CA) has been submitted by the User Agency, which has been forwarded to the Government of India via SG office's letter dated 19-12-2024.(Annexure-II). An order has been issued by the Tehsildar, Bijuri, regarding the mutation of the CA land (non-forest land) being provided by the User Agency in favour of the SECL Hasdeo Area (Annexure-III).
ii.	The State Government shall immediately transfer and mutate the non-forest land identified for Compensatory Afforestation, in favour of the State Forest Department.	Compensatory Afforestation (CA) has been submitted against forest land. This was forwarded to the Government of India via a letter dated 19-12-2024 from the Additional Principal Chief Conservator of Forests (Land Management), Madhya Pradesh, Bhopal. (Annexure-II)
iii.	The non-forest land identified for raising Compensatory Afforestation shall be notified as Reserved Forest under Section 4 / Protected Forest under Section 29, of the Indian Forest act, 1927, by the State Government immediately.	The land has been transferred in favour of the Forest Department and is being maintained as per approved norms. An order has been issued by the Tehsildar, Bijuri, regarding the mutation of the CA land (non-forest land) being provided by the User Agency in favour of the SECL Hasdeo Area.(Annexure-III).
iv.	Penal Compensatory Afforestation shall be raised and maintained over degraded forest land twice in extent to the forest land worked in violation of the Forest (Conservation) Act, 1980 (i.e. $(8.526 + 6.359 + 6.090) = 20.975$ ha. $\times 2 = 41.950$ ha.). The User Agency shall transfer the cost of penal Compensatory Afforestation and its maintenance to the State Forest Department.	In compliance with Condition No. 2(iv), an amount of ₹1,93,31,782/- (One Crore Ninety-Three Lakh Thirty-One Thousand Seven Hundred Eighty-Two Rupees) for penal plantation has been deposited by the User Agency into the CAMPA fund. (Annexure-IV).
v.	The State Government shall charge 100% Net Present Value over 123.56	In compliance with this point, the difference amount of 834 Crore has been deposited by the

	ha. of the forest area (surface area) to be diverted under this proposal from the User Agency as per the orders of the Hon'ble Supreme Court of India dated 30.10.2002 and 01.08.2003 in IA No. 566 in WP (C) No. 202/1995 and as per the guidelines issued by this Ministry vide letters No. 5-1/1998-FC (Pt. II) dated 19.08.2003, as well as letter No. 5-2/2006-FC dated 03.10.2006 in this regard.	User Agency into the CAMPA fund according to the new rates of NPV (Net Present Value). As per instruction of the Hon'ble Supreme Court, the payment of NPV 350 Cr paid to Ad-hoc CAMPA by the User Agency. (Annexure-V).
vi.	The State Government shall charge 50% of the Net Present Value over 502.00 - 123.56 ha. = 378.44 ha. (Underground area) of the forest area to be diverted under this proposal from the User Agency as per the orders of the Hon'ble Supreme Court of India.	In compliance with this point, the amount has been deposited by the User Agency into the CAMPA fund. (Annexure-V).
vii.	The State Government shall charge Penal Interest on the payment of the Net Present Value w.e.f. 25.10.2004 i.e. the date of grant of Temporary Working Permission, on which date the NPV had become-due.	In compliance with this condition, the User Agency deposited a total penal interest amount of Rs. 1,12,38,336/- via D.D. No. 049866 dated September 5, 2011, and D.D. No. 050254 dated September 20, 2011, for amounts of Rs. 83,55,778/- and Rs. 28,82,558/- respectively, at the Forest Division (General) Office, Anuppur.(Annexure-VI). The amount deposited by the User Agency was transferred via Check No. 196041 dated December 15, 2011, and Check No. 196042 dated December 16, 2011, through core banking by Punjab National Bank Anuppur, Madhya Pradesh, to the account of the Additional Principal Chief Conservator of Forests (Land Management) (Nodal Officer FC Act), Account No. 1276000100238015, Punjab National Bank, New Market Branch, Bhopal.
viii.	Additional amount of the NPV of the diverted forest land, if any, becoming due a finalization of the same by the Hon'ble Supreme Court of India on receipt of the report from the Expert Committee, shall be charged by the State Government from the User Agency. The User Agency shall furnish an undertaking to this effect.	The User Agency accepts the condition and is committed to depositing any difference in the Net Present Value amount in the future as per the decision of the Hon'ble Supreme Court. (Annexure-VII).
ix.	All the funds received from the User Agency under the project shall be transferred to in Account No. CA 1580 of Corporation Bank, Block-II, CGO	In compliance with this condition, the Forest Division (Gen.) Anuppur, M.P., has collected all necessary project amounts from the User Agency as per the conditions imposed by the Government

	Complex, Phase-I, Lodhi Road, New Delhi-110003.	of India and transferred them to the Government of India's CAMPA fund account.
x,	The User Agency shall create, fence and maintain a proper safety zone around the mining area. The User Agency shall deposit funds with the Forest Department for the creation, protection and regeneration of the safety zone area, and also shall bear the cost of afforestation over one and a half time of the safety zone area in degraded forest elsewhere.	In compliance with this condition, the User Agency transferred an expenditure amount of Rs. 1,42,53,313/- for safety zone work through RTGS to the CAMPA fund account at Union Bank of India, New Delhi, Account No. 344902010105423, with UTR No. SBIN515107104700 dated April 17, 2015. (Annexure-VIII).
xi.	The period of lease for the diversion of 502.00 ha. of forest land for renewal of lease for Rajnagar RO / Under - Ground Coal Mining project in Anupnagar District of Madhya Pradesh in favour of CGM Hasdeo region of South Eastern Coal Fields Ltd., (SECL), and also diversion of 123.565 ha. forest land of the same area for surface use for the same project, shall be for a period of 20 years.	In compliance with this condition, the User Agency agreed the condition and has submitted an undertaking to this effect, which is attached to the compliance report.
xii.	The User Agency shall fence, raise and maintain plantations of suitable tree species on the surface area of the mine.	The User Agency agreed the stipulated condition and undertakes to execute the required works through the Forest Development Corporation. A formal undertaking to this effect is submitted with the compliance report.
xiii.	No damage shall be caused to the top-soil and the surface area of the mine. If any damage to the top soil and the surface area of the mine is reported, than the User Agency shall raise and maintain Compensatory Afforestation and Penal Compensatory Afforestation as may be stipulated under rules	The User Agency agreed the stipulated condition and a formal undertaking to this effect are submitted with the compliance report.
xiv.	The State Government / User Agency shall initiate action against the persons involved in the violation of the Forest (Conservation) Act, 1980, and submit an action taken report to the Ministry of Environment & Forests within a period of six months.	The User Agency agreed the stipulated condition and a formal undertaking to this effect are submitted with the compliance report.
xv.	The Regional CCF, Bhopal shall take immediate legal action for violation of the Forest (Conservation) Act, 1980.	The case is extremely old, there is a formal request by the State Govt. to consider the matter sympathetically. Approval of the aforementioned case was granted approximately 40 years ago. The relevant records are no longer traceable, and it is not feasible to fix individual accountability at this stage. Moreover,

		the project proponent has already complied with the requirement of depositing Penal CA as corrective action under conditions 2 (iv). (Annexure-IX)
xvi.	The forest land shall not be used for any purpose other than that specified in the proposal.	Except column no. 08 forest land (surface forest land), the remaining surface forest land shall not be used for any other purpose that specified in the proposal during inspection.
xvii.	All other conditions stipulated by the State Government of Madhya Pradesh at the time of xviii. Submission of the proposal shall be complied with by the User Agency.	All other conditions stipulated by the State Government and standard conditions applicable to underground mining/surface rights have been complied with.
xviii.	Other standard conditions as applicable to proposals related to underground mining / surface rights shall also be applicable in the instant case.	All other conditions stipulated by the State Government and standard conditions applicable to underground mining/surface rights have been complied with.

Accordingly, the User Agency in its compliance stated that the cost of raising Compensatory Afforestation as per demand raised by the DFOs were paid to the respective DFOs which is evident from the compliance report submitted by the respective DFOs. The reports on the status of CAs raised by the concerned DFOs are still pending with the State Government.

As informed by the forest officials and it is submitted that this is a continuation case of existing uses and involves no change in the physical or operational parameters of the project. There has been no alteration in the extent of forest land involved, no. of project affected trees, vegetation density of scope of activities as previously approved. The subsidence prediction report based on 3D modelling indicating surfaces strain has been prepared by NIT, Rourkela.

Hon'ble Supreme Court's order dated 16.12.2005 in IA no. 1441 in WP(C) 202 of 1995 "*having regard to the peculiar circumstances brought to our notice by learned Solicitor General and having regard to the larger public interest, we permit operation of the mine subject to the applicant - South Eastern Coalfields Ltd.- depositing an amount in the sum of Rs. 50 crores towards NPV and undertaking to deposit the remaining amount. The amount shall be deposited with CEC*" and another order passed dated 08.09.2006 and directed SECL to deposit on lumpsum basis and the mining operation were allowed to continue (Annexure-V).

During inspection, it is observed that some information from User Agency still not provided for reference that are as follows:

1. The proposal was accorded Stage-I approval vide letter dated 10.01.2008 stated that *“after receipt of the compliance report on the fulfilment of the above-mentioned conditions contained in Para 2 above the State Government of Madhya Pradesh, formal approval will be issued in this regard under section-2 of the Forest (Conservation) Act, 1980. The transfer of forest land to the User Agency shall not be affected by the State Government till formal orders approving the diversion of forest land are issued by the Central Government.”* As per records, a compliance report was submitted vide letter dated 19.08.2015. However, **the order/document which allow transfer of forest land to the User Agency was not provided by the user agency or the Divisional Forest Officer. The user agency as well as the DFO have not provided any document/ reports to prove no mining activity was carried out during the intervening period.** The concerned Divisional Forest Officer (DFO)/User Agency (SECL) shall submit documentary evidence regarding any mining activities carried out by the User Agency during the intervening period.
2. The concerned DFO/ User Agency (SECL) is required to submit a comprehensive report detailing the complete timeline of mining activities. This submission must explicitly state the date of commencement, the duration of active operations, and the final date of closure.

Site Inspection

1. **The details of Surface use of forest land i.e. 123.567 ha are as follows:**
 - a. **RAILWAY SIDING**

The railway siding involving diversion of 18.336 ha, was granted approval vide letter dated 01.12.1983 (Annexure-X) from Ministry of Agriculture and cooperation, Govt. of India. Accordingly, as per the compliance report of DFO Anuppur, the cost of raising CA was deposited with DFO Shahdol and the CA target was allotted to Bilaspur Circle (Annexure-X). As per Stage-I condition no. (v), the payment of NPV has already been adjusted in the 350 Cr paid to CEC by the User Agency, as per instruction of the Hon'ble Supreme Court (Annexure-V). During the inspection, the representative of SECL informed that the Part of the said railway siding (about 300 meter in length) falling in reserved forest is not required

anymore and hence required to be dismantled and returned to the State Forest Department. It was further observed that the said part of the railway siding comprising of single railway track was bounded by concertina coil on both the sides. **The same may cause injury to the wildlife in the area and hence it is suggested to dismantle the concertina coil and the railway track as they are no longer required and returned to the Forest Department.**

Therefore, it is observed that the construction of railway siding falling in the reserve forest is as per Central Government approval and about 300 meters from tail end it is no longer in use and required to be dismantled and returned to State Forest Department. However upon the inspection and Orders/documents provided by the SECL, Stage II approval was not seen.

b. RESIDENTIAL COLONY

There are two residential colonies in the proposed diversion area of 502.00 ha for the Rajnagar RO underground mining project. They are as follows:

- a. Residential colony (Type A):- 8.526 ha
- b. Residential colony (Shanti Nagar):- 6.359 ha

It is observed that the two residential colonies were constructed with the approval of MP Govt. (Annexure-XI & XII) and did not have any approval of Govt. of India, though the colonies were constructed in Reserve Forest. Hence, there is violation of FCA, 1980. The colonies are still inhabited.

c. CONSTRUCTION OF MAGAZINE

It was observed that a Magazine was constructed in an area of 0.70 ha and was still in use. Further, it is observed that permission of Govt. of India was obtained vide letter no. 8-104/81FRY dated 18.03.1982 for construction of the said Magazine with certain conditions (Annexure-XIII). Since the same Magazine is proposed for renewal which was constructed after approval dated 18.03.1982 and there is no any further addition to the same. However, upon the inspection and Orders/documents provided by the SECL, Stage II approval was not seen.

MINING WORK

The proposal for renewal has been applied for two patches for mining works i.e. 43.643 ha (Sector-B) and 36.587 ha (Sector-E).

1. The mining work involving diversion of 43.643 ha which is a part of 83.083 ha, was granted approval vide letter dated 29.03.1994 from Ministry of Environment & Forest, Govt. of India (Annexure-XIV).
2. The mining work involving diversion of 36.587 ha which is a part of 55.030 ha, was granted approval vide letter dated 12.09.1996 from Ministry of Environment & Forest, Govt. of India (Annexure-XV).

The document provided by the SECL and the records available in the RO, Bhopal has does not indicate grant of Stage-II /final approval for Rajnagar underground Coal mining. for the proposal FP/MP/MIN/1384/2006. The SECL had continued with the mining, notwithstanding the condition of handing over in the Stage I and the subsequent **invoking of Stage I, there is violation of act .**

d. 6A/6B INCLINE

The area proposed for renewal of mouth of incline is 3.326 ha. It is observed that permission of Govt. of India was obtained vide letter no. 8-387/82FRY dated 21.05.1983 for digging incline mouth with certain conditions (Annexure-XVI). The 6A/6B incline is not in operation since 2007 and the same can be handed over to the State Forest Department. However, upon the inspection and Orders/documents provided by the SECL, Stage II approval was not seen.

e. STADIUM

A stadium is spread over 6.090 ha was observed to be constructed without the approval Govt. of India. As per observation made in the field, the stadium has facility like visitors' gallery covered with shade on the main entrance and also some construction on the opposite side. There is also black top approach road laid on three sides of the stadium. It was also observed that the stadium was in use. From the looks of the construction, it is observed that the same is constructed few years back, not so old and might have been renovated after 1980 as the same structures are observed in Google Imagery of 2010. As seen in the inspection and Orders/documents provided by the SECL, there is violation of FCA, 1980.

2. Underground Component:

During the site inspection, discussions were held with the representative of SECL regarding underground coal mining activities. SECL furnished the underground mining map (Annexure XVII). It is noted that physical verification of the extent of underground mining and correlating it with geo-coordinates on the surface is not feasible for the Regional Office during site inspection. Accordingly, based on the underground mining map provided by the user agency, it is not possible to ascertain any violation of the Forest (Conservation) Act, 1980 during the site inspection.

The proposal was granted Stage-I approval vide MoEF& CC letter no. 8-145/2006-FC dated 10.01.2008 (Annexure-I & XVII). However, upon the inspection and Orders/documents provided by the SECL, Stage II approval was not seen. Hence, the activities without Stage II constitute violation of FCA, 1980.

Comments Of Assistant Inspector General of Forests (C)along with detailed reasons:	Taking into consideration the observations recorded during the inspection, the proposal shall be considered in accordance with the provisions of the Comprehensive Handbook, 2023, particularly in light of the violations observed during the inspection.
---	--



**Rajesh Darade
Assistant Inspector General of Forests (C)
Regional Office, Bhopal**

<p>Comments of Deputy Director General of Forests, Regional Office Bhopal</p>	<p>An SIR for the proposal FP/MP/MIN/39881/2019 was submitted by the Regional Office, Bhopal vide F.No 6-MPA047/2006-BHO dated 24-05-2024. Pursuant to direction from MoEF&CC vide No.: 8-14/2020-FC (E- 140165) dated 19-01-2026, wherein the Regional Office Bhopal was requested to submit the detailed report on the subject proposal along with the SIR of the Rajnagar RO Underground mine of the South Eastern Coalfield Limited (SECL) (Proposal No: FP/MP/MIN/1384/2006) it is submitted that: -</p> <ol style="list-style-type: none"> 1. The site inspection of surface mined area covered a total forest land area of 123.567 ha which is surface use. It was observed that the railway siding (18.336 ha), magazine (0.70 ha), mining activities in Sector-B and Sector-E (80.230 ha), and 6A/6B incline (3.326 ha) were all constructed and operated after Stage I approval of the Government of India. However, a portion of approximately 300 metres of the railway siding within Reserved Forest is no longer in use and should be dismantled along with the concertina fencing to prevent potential harm to wildlife and to facilitate handing over to the State Forest Department. 2. Two residential colonies (14.885 ha) and a stadium (6.090 ha) were found to have been constructed within Reserved Forest without prior approval of the Government of India, though the colonies had State Government approval and are presently inhabited. The stadium, which includes structural facilities and approach roads and appears to have been developed post-1980, is also currently in use. These components therefore constitute violations of the Forest (Conservation) Act, 1980. 3. With regard to the underground mining component, although Stage-I approval was granted vide MoEF&CC letter dated 10.01.2008, physical verification of underground operations, its extent and their correlation with surface geo-coordinates was not feasible during site inspection. Accordingly, based on the documents and maps provided by the user agency, no conclusive determination regarding violation could be made for the underground component. The user agency has submitted vide Ref No:- SECL/HSD/Forest/2026-27/218 dated 16-04-2026 that no fresh forest land was broken up, and all mining operations have been carried out only within the already broken-up forest land during the said period. That out of 123.567 ha surface applied for renewal, mining operation ceased since January 2008 in Rajnagar OCP -Sector B and in Rajnagar OCP-Sector - E since March 2015. The UA has further submitted that Stage II clearance is still awaited and
---	--

	<p>no specific order/documents regarding transfer of forest land or grant of working permission by the State Forest Department in favour of SECL are available after grant of Stage I approval. The underground mining is continuing in Rajnagar Underground mines since the grant of Stage I and are presently in operation (Annexure XVIII)</p> <p>Considering that the underground mining operations has continued without Stage II approval, and violation is reported on surface also, it is recommended that the proposal may be considered with due penalty.</p>
--	--



S. Senthil Kumar
Dy. Director General of Forests (Central)
Regional Office, Bhopal

FIELD INSPECTION PHOTOGRAPHS



