



STATE FOREST HEADQUARTERS, ODISHA  
OFFICE OF THE PRINCIPAL CHIEF CONSERVATOR OF FORESTS & HoFF  
PLOT NO. GD-2/12, ARANYA BHAWAN, CHANDRASEKHARPUR  
BHUBANESWAR-751023

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No. /9F (MG) – 12/2023  
Dated, Bhubaneswar the July' 2023

From

**Sri Susanta Nanda, IFS**  
Principal Chief Conservator of Forests  
(Forest Diversion & Nodal Officer, FC Act)  
O/o the PCCF & HoFF, Odisha, Bhubaneswar

To

**The Assistant Inspector General of Forests (FC)**  
Government of India,  
Ministry of Environment, Forests & Climate Change (F.C. Division)  
Indira Paryavaran Bhawan, Aliganj, Jor Bagh Road  
New Delhi-110003

**Sub:- Proposal for seeking prior approval of the Central Government under Section 2 (ii) of the Forest (Conservation) Act, 1980 in favour M/s Raga Tradecon Pvt. Ltd. for non-forestry use of 66.242 ha (including 2.09 ha safety zone) of forest land for Mining of Iron Ore within Netrabandha Pahar (West) Iron Ore Block in villages Baldihi and Sanua under Bonai Forest Division of Sundargarh Odisha – Compliance to GoI observations.**

Ref:- Letter No.8-14/2023-FC dated 02.05.2023 of the Assistant Inspector General of Forests, GoI, MoEF & CC (FC Division), New Delhi.

Sir,

In inviting a reference to GoI, MoEF & CC (FC Division), New Delhi letter cited above on the captioned subject, the compliance basing on the reports of the DFO, Bonai and RCCF, Rourkela Circle is furnished below:-

**Observation (i):-** As per approved mining plan the forest area is 52.06 ha, whereas the forest area proposed for diversion is 66.242 ha. This discrepancy is required to be removed.

**Compliance:** In compliance to the above observation, the RCCF, Rourkela Circle has reported that the State Govt. had already informed the Ministry that the Chief Surveyor, O/o the Director of Mines, Odisha, Bhubaneswar had submitted the land schedule of 74.370 ha out of which 52.056 ha was of forest land and 22.314 ha Non-forest land involved in the project in respect of Netrabandha Pahar West block. The Copy of the land schedule is enclosed as **Annexure-I**. Accordingly, the Govt. of Odisha Steel and Mines Department has supplied the DGPS map of allotted block and land schedule.

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Further, during DGPS survey, it is found that there were discrepancies in the land schedule and subsequently, the User agency requested the Director of Mines to supply the authenticated land schedule. The Director of Mines provided the authenticated land schedule to the User Agency vide Memo No.3458 dated 25.04.2022 that the total forest land is 163.686 acres or 66.242 ha out of which Revenue Forest land 8.032 ha, DLC land 8.799 ha and PRF 49.411 ha. The copy of authenticated Land schedule is enclosed as **Annexure-II**.

Soon after getting the LoI, the user Agency had prepared the mining plan based on the land schedule wherein forest land was mentioned as 52.056 ha. Hence in the approved mining plan, the extent of forest land was 52.056 ha. However, the User Agency have now got the Mining plan modified as per the rectified land schedule provided by the Director of Mines. The copy of modified Mining Plan along with progressive Mine Closure Plan approved by the Indian Bureau of Mines, Regional Controller of Mines, Bhubaneswar is enclosed herewith as **Annexure-III**.

***Observation (ii):- All the documents related to CA like CA Scheme, KML file, DGPS Maps, SoI Topo sheet etc. have not been uploaded on the PARIVESH portal.***

**Compliance:** In compliance to the above observation, the RCCF, Rourkela Circle has reported that all the documents related to KML file, DGPS Maps, SoI Topo sheet of CA Scheme have been uploaded on the PARIVESH portal. The KML and Shape file in CD form is enclosed.

***Observation (iii):- CA Scheme for raising Compensatory Afforestation over non-forest land shall be provided/uploaded.***

**Compliance:** In compliance to the above observation, the RCCF, Rourkela Circle has submitted the CA Scheme for raising Compensatory Afforestation on Non-Forest Govt. land over 64.50 ha identified in village Mahupada under Koida Tahasil of Rourkela Division. land which is enclosed herewith as **Annexure-IV**. Further, the DFO, Bonai has reported that the said CA scheme has been uploaded in the PARIVESH portal.

***Observation (iv):- The copy of the ownership/revenue record and the documentary evidence regarding allotment of Non-forest Govt land for the purpose of Compensatory Afforestation shall be submitted.***

**Compliance:** In compliance to the above observation, the RCCF, Rourkela Circle has reported that the Tehsildar, Koira has identified Non-Forest Govt. land over an area of 64.500 ha. in village Mahupada under Koira Tehsil in Sundargarh District for the purpose of Compensatory Afforestation. The copy of the Letter No.2533 dt.31.10.2022 of Tehsildar, Koira regarding identification/ allotment of non-forest Govt. land for raising Compensatory Afforestation is enclosed as **Annexure-V Series**. The Joint Verification Report and Land Suitability Certificate of non-forest Govt. land identified for CA have been enclosed as **Annexure-V Series**.

***Observation (v):- There are some non-site-specific activities like Waste dump, Mineral stacking yard / Mineral Storage/processing etc. which have been proposed on forest land. The justification for the same shall be provided.***



**Compliance:** In compliance to the above observation, the RCCF, Rourkela Circle has reported that the land-use like Waste dump, Mineral stacking yard / Mineral Storage/processing plant etc have been earmarked in the forest & non-forest area in the conceptual plan of Mining Plan. The land use of Forest diversion proposal has been prepared in accordance with the conceptual plan of the mining plan.

As per the report of the User Agency, the DFO, Bonai has reported that the area earmarked for dumping is 7.403 ha as because during plan period ore will not be exhausted in any place and hence the waste generated during mining operation has to be kept in the external dump. After exhaust of mineral, the User Agency will not use any forest land for dumping purpose. The area earmarked for storing of minerals is 10.889 ha., Out of which 4.790 ha is for sub-grade ore (45% Fe to 55%Fe) which has no market and it has to be preserved as per Rule 14 of Mineral Conservation and Development Rule, 2017.

The balance 6.099 ha is for stacking & storing of Minerals. Considering the grade wise and size wise requirement of the consuming industries, the ore raised is to be segregated and stacked separately for sale purpose. Considering from the mineral conservation point of view, the Indian Bureau of Mines, Govt. of India is emphasizing on assessment of the iron ore reserve with the cut-off grade of 45%Fe and stacking of the sub grade ore properly. Presently, the good quality ore is only marketable and the sub-grade ore raised are normally not sold presently, which are required to be stacked separately for the future use.

However, most of the activities are temporary in nature the same will be shifted to the area earmarked for mining after exhaust of Minerals and reclamation.

**Observation (vi):-** *Component wise breakup given in online application is not in conformity with that in the approved mining plan. State Govt shall ensure that the proposed component wise land-use is in conformity with the land-use in the approved mining plan. A comparative analysis of the same shall be made and submitted.*

**Compliance:** In compliance to the above observation, the RCCF, Rourkela Circle has reported that the User Agency has intimated that the format of Mining Plan for conceptual land use is not in consonance with the Forest Diversion Proposal. Hence, the user agency has submitted the modified mining plan alongwith progressive mining closure plan which is enclosed as **Annexure-III**. The UA has submitted the comparative analysis as under:-

**Comparison Table between Mining Plan & Forest Diversion Proposal**

Sl. No.	Forest Diversion Proposal	Forest Land in ha	Non-forest land in ha	Total in Ha	Mining Plan	Area in Ha.
1	Mining including mines road and mobile mineral processing unit	41.677	2.143	43.820	Mined Out area in the Lease	43.820



Sl.No.	Forest Diversion Proposal	Forest Land in ha	Non-forest land in ha	Total in Ha	Mining Plan	Area in Ha.
2	Waste dump with safeguard measures like retaining wall, garland drain and settling pond, check dam etc.	7.403	-	7.403	Area under Dumps (Waste dump, Ore Stack yard & top soil)	7.403+ 10.889+ 0.272 = 18.564
3	Mineral stacking yard	10.761	0.128	10.889		
4	Top Soil	0.272	-	0.272		
5	Road	2.724	0.247	2.971	Area under utility services (Road+ infrastructure + Entry & Exit road)	2.971+ 0.010+ 1.652 = 4.633
6	Entry and exit within safety zone area	-	0.010	0.010		
7	Infrastructure (Office, Magazine, work shop, fuel station, parking plaza & Temp. Top Soil yard etc.)	-	1.652	1.652		
8	Green Belt / Grass Turfing	1.315	2.143	3.458	Area undisturbed/ virgin (Green belt & Safety zone and undisturbed land)	3.458+ 0.903+ 2.992 = 7.353
9	Undisturbed Land	-	0.903	0.903		
10	Safety zone around ML boundary	2.090	0.902	2.992		
<b>Grand Total</b>		<b>66.242</b>	<b>8.128</b>	<b>74.370</b>		<b>74.370</b>

The copy of relevant pages of Mining plan & modification of mining plan are enclosed as **Annexure-VIII & IX.**

**Observation (vii):-** The Cost benefit ratio has been mentioned as 1:814 which is very high. The State Govt. shall recheck the same. Further the CB analysis has to be prepared keeping in view the parameters and format prescribed in the FCA Handbook of guidelines.

**Compliance:** In compliance to the above observation, the RCCF, Rourkela Circle has reported that the CB analysis ratio is mentioned in the proposal as 1:32 not 1:814 at **Page No.192-194/DP.** However, the CB Analysis has been re-checked and prepared as per the format prescribed in the FCA handbook of guideline and it comes to 1:33. The copy of CB analysis is enclosed as **Annexure-X.**

**Observation (viii):-** Elephant movement is reported in the area proposed for diversion. Therefore, comments of PCCF (Wildlife) and CWLW, Odisha needs to be provided by the State Government.



**Compliance:** In compliance to the above observation, the RCCF, Rourkela Circle has reported that the Principal Chief Conservator of Forests (Wildlife) & CWLW, Odisha, Bhubaneswar has submitted the compliance on the said observation to the Forest, Environment & Climate Change Deptt. Govt. of Odisha vide his Letter No. 6466 dt.05.06.2023 with copy to DFO, Bonai Division that presence of wildlife, particularly elephants is observed in the areas surrounding the project. However, with appropriate site specific mitigation measures, the effect of the project on the wildlife may be reduced. Accordingly, the Site Specific Wildlife Conservation Plan will be prepared and implemented to mitigate the effect of the project on the wildlife therein. And, such interventions to be prescribed will be for both project area; and also, within the Zone of Influence (ZoI) of 10 km radial distance. The entire cost thereof for its implementation in ZoI will be borne by the Project Proponent for which the undertaking by the project proponent has already been furnished along with the forest diversion proposal. The copy of Letter No. 6466 dt. 05.6.2023 of the PCCF (WL) & CWLW, Odisha is **enclosed as Annexure-XI**.

***Observation (ix):- The KML file of the proposed area indicating the land use plan /component wise breakup/ mineralized and non-mineralized zonation shall be submitted.***

**Compliance:** In compliance to the above observation, the RCCF, Rourkela Circle has reported that the User Agency has submitted the KML file of the proposed area indicating the land use plan /component wise breakup/ mineralized and non-mineralized zonation **in CD form enclosed herewith**.

***Observation (x):- The proposal does not contain the details as to how the requirement of water, electricity and road will be met in the instant case. The mode of transportation has been mentioned as road, however it is not clear whether a new road will be constructed or an already existing road is to be utilized. The detail of additional forest land required (if any) for above shall also be intimated.***

**Compliance:** In compliance to the above observation, the RCCF, Rourkela Circle has reported that the CGWA, GoI have granted NOC to draw ground water to a tune of 62 CuM/day (**Annexure-XII**). Further, the user Agency has submitted that one road constructed under DMF (District Mineral Foundation Funds) is passing adjoining to the lease hold area and Electric line is also passing in the ROW of DMF road. Hence no additional forest land is required for water, road & electricity.

***Observation (xi):- A copy of the approval of regional wildlife plan and the basis of calculation of the money proposed to be realized from the User Agency in this regard shall be submitted.***

**Compliance:** In compliance to the above observation, the RCCF, Rourkela Circle has reported that the Principal Chief Conservator of Forests (Wildlife) & CWLW, Odisha, Bhubaneswar has submitted the compliance with the said observation to the Forest, Environment & Climate Change Deptt. Govt. of Odisha vide his Letter No.6466 dt.5.6.2023 with copy to DFO, Bonai Division. In the aforesaid letter, it is mentioned that a copy of the Comprehensive Regional Wildlife Management Plan prepared & approved for Keonjhar and Bonai Division is enclosed

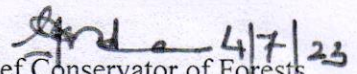


herewith as **Annexure-XIA**. The plan was approved by the Govt. of Odisha vide Letter No.22295/F&E dt.30.12.2005 (**Annexure-XIB**) with provision for deposition of ₹15,000/- per ha. and ₹11,000/- per ha. of mining lease area, as the case may be, for implementation of mitigative measures. Subsequently, due to enhancement of minimum wage rate and escalation of material cost, the cost norm has been revised to ₹82,000/- per ha. to be realized over the entire mining lease area vide Letter No.26159/F&E dt.5.12.2018 of F&E Deptt., Govt. of odisha (**Annexure-XIC**). The said norm is still continuing. During the intervening period, the Wildlife Trust of India was entrusted by the State Govt. with preparation of Odisha State Comprehensive Wildlife Management Guidance (OSCOW-MAG), and now based on the said Guidance submitted by WTI on 25.01.2021, various management interventions are being carried out every year, on priority, in those areas from where the approved cost towards RWLMP @ ₹ 82,000/ ha. has been realized. The copy of Letter No.6466 dt.5.6.2023 of the PCCF (WL) & CWLW, Odisha is **enclosed as Annexure-XI**.

In view of the above, the compliance to the observations dated 02.05.2023 of the GoI, MoEF & CC (FC Division), New Delhi is sent herewith for favour of kind information and necessary action.

**Encl: Compliance in one set**

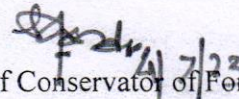
Yours faithfully

  
Principal Chief Conservator of Forests  
Forest Diversion & Nodal Officer, FC Act

Memo No. / Dt.

Copy along with one set of compliance forwarded to the Deputy Director General of Forests (Central), GoI, MoEF & CC, Integrated Regional Office, Chandrasekharpur, Bhubaneswar-751023 for favour of kind information and necessary action with reference Letter No.8-14/2023-FC dated 02.05.2023 of the Assistant Inspector General of Forests, GoI, MoEF & CC (FC Division), New Delhi.

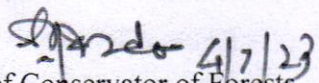
**Encl: Compliance in one set**

  
Principal Chief Conservator of Forests  
Forest Diversion & Nodal Officer, FC Act

Memo No. 13394 /Dt. 04.07.2023

Copy along with one set of compliance forwarded to the Additional Chief Secretary to Government, Forest, Environment & Climate Change Department, Odisha, Bhubaneswar for favour of kind information and necessary action with reference to with reference to Letter No.8-14/2023-FC dated 02.05.2023 of the Assistant Inspector General of Forests, GoI, MoEF & CC (FC Division), New Delhi.

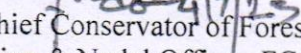
**Encl: Compliance in one set**

  
Principal Chief Conservator of Forests  
Forest Diversion & Nodal Officer, FC Act



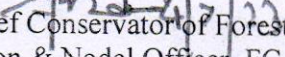
Memo No. /Dt.

Copy forwarded to the PCCF (WL) & CWLW, Odisha, Prakruti Bhawan, Plot No.1459, Saheed Nagar, Bhubaneswar-751007 for favour of kind information and necessary action with reference to with reference to Memo No. 1885 dated 21.06.2023 of RCCF, Rourkela Circle.

  
Principal Chief Conservator of Forests  
Forest Diversion & Nodal Officer, FC Act

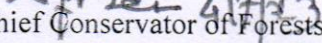
Memo No. /Dt.

Copy forwarded to the RCCF, Rourkela Circle for information and necessary action with reference to his Memo No. 1884 dated 21.06.2023.

  
Principal Chief Conservator of Forests  
Forest Diversion & Nodal Officer, FC Act


Memo No. /Dt.

Copy forwarded to the Divisional Forest Officer, Bonai Forest Division for information and necessary action with reference to Memo No. 1886 dated 21.06.2023 of RCCF, Rourkela Circle.

  
Principal Chief Conservator of Forests  
Forest Diversion & Nodal Officer, FC Act

Memo No. /Dt.

Copy forwarded to M/s Raga Tradecon Pvt. Ltd. 1st floor, Shyam Residency, Flat No.101, Near Jharpada Jail, Bhubaneswar-751006 for information and necessary action.

  
Principal Chief Conservator of Forests  
Forest Diversion & Nodal Officer, FC Act