

ಣುಷ ಅರಣ್ಯ ಸಂರಕ್ಷಣಾಥಿಕಾಲಗಳ ಕಥೆಲಲ, ಗದಗ ವಿಭಾಗ, ಗದಗ. ಜಂಕದಕಣ್ಣ- 582103 Office of the Deputy Conservator of Forests, Gadag Division, Gadag- Binkadakatti- 582103 ದೂರವಾಣಿ ಸಂಖ್ಯೇ: 08372-200289 ಇ-ಮೇಲ್ : dyconservatorgadag@gmail.com

No. A4/GFL/FC/RMML/Mining/39.899Ha./CR-09/2020-21

06.06.2022

To,

The Chief Conservator of Forests, Dharwad Circle Dharwad

Sir,

- Sub: Online submission of application reg. Diversion of 39.70 Ha. (39.90 Ha. of Mining lease and 0.20 Ha. of approach road) of forest land in Sy No. 45, 49 and 50 of Jalligeri village, Kasaba Hobli, Shirahatti Taluka, Gadag District for establishing Sangli Gold Mine in favour of Ramghad Minerals and Mining Ltd., Hosapet, Vijayanagara District.
- Ref: 1. Proposal No.FP/KA/MIN/42366/2019 dated 24.08.2020 of Ramgad Minerals and Mining Ltd. Hospet.
 - 2. Principal Chief Conservator of Forests, (FC) & Nodal Officer (FCA) Benglore letter No: KFD/HOFF/A5-1(MNG)/7/2019-FC. Dt: 09.11.2021
 - 3. Your office letter No:A1/GFL/SGM/Jalligeri/CR-1/2020-21/1396. Dt: 20.11.2021.

This is with regard to the letter as under ref(1) above wherein the User Agency M/s Ramgad Minerals and Mining Limited, Hosapete, Vijayanagara District has raised certain objections to the Reports filed by the DCF and CCF in their FC Proposal No. FP/KA/MIN/42366/2019. The objections raised are being replied to as under :

1. The mining lease area for which request has been made is not even 0.5% of the Kappatagudda Wildlife Sanctuary, ESZ and Buffer Recorded Forest Area.

Explanation : The total forest area under the Kappatagudda Wildlife Santuary is 244.15 Sq.km., the buffer forest area 48.87 sq.km and the total proposed ESZ area (not yet finalised) 297.33 sq.km. The ESZ declaration is mandatory for all protected areas so as to prohibit and allow different categories of projects. In the proposed ESZ, all mining projects and quarries are prohibited anyways. Encroachments in the form of illegal grants, rejected FRA applications and extra possession by the FRA

applicants is already a big issue to be taken up at priority. To say that the proposed area for diversion is just a miniscule of the total forest area is at best an attempt to assume a utopian scenario where the entire sanctuary is intact and only this mining project will be the actual loss of the area. The proposed project lies within the core of the Sanctuary with unhindered wildlife movement and profuse natural regeneration. After declaration of the Sanctuary, the entire forest area has got a new lease of life and is increasingly becoming a haven for different species of wild animals.

2. Mining pit acts as gully point and helps in enriching the ground water.

Explanation : The Forest Department right from its institution has undertaken massive Soil Moisture Conservation (SMC) works along with plantation works in the forest area forming part of the Kappatgudda sanctuary. After the introduction of MNREGA, additional SMC works, creation of small small waterbodies, gully checks, contour trenches and check dams have been created in the forest areas which have improved the soil moisture regime of the area which can be seen through excellent regeneration of native species. More so Kappatgudda is the biggest catchment area for Gadag district which already receives less than 700 mm of annual rainfall and is drone-prone district.

The efforts of the Forest Department in taking up extensive SMC works is already showing results. The proposal to allow mining in the Sanctuary and presenting a case where mining pits aiding in enriching ground water is penny-wise pound-foolish situation.

3. The wildlife mentioned by Forest Officers are common species. The appellant also challenges the existence of some of the species mentioned to have inhabited that area.

Explanation : In the earlier opinion by the DCF and the CCF mention of several precious species of wildlife have been mentioned. Camera trap images have confirmed the presence of these species not only in large numbers, but also they seem to be breeding which is again vindicated by the frequency of capture of the images in various locations.

Indian wolf present in large numbers at Kappathgudda is one of the most endangered animals which once ruled this landscape in large numbers. Due to increased biotic pressure, killing and depletion of prey base, their conservation is now the of utmost importance. Wolf is the key stone species of a forest in the absence of tiger and helps in keeping the population of the prey base in check. Any imbalance in their numbers will lead to increased crop raids of nearby agricultural fields, which can be substantiated by the crop compensation data given by the Department.

Apart from the wolves, striped hyena, foxes, jackals, leopards are some of the other carnivores present in Kappatgudda. Two species of the antelope viz. Black buck and four-horned antelope (Chousingha), barking deer, spotted deer, pangolins, pocupines etc are seen in large numbers which have been confirmed by camera trap images.

This sanctuary is rich in different species of snakes and other reptiles which is again frequently seen by the staff in their regular rounds of the Sanctuary and duly noted down in the registers.

4. The proposed area is not a virgin area, and was a part of the area where gold was extracted by the Britishers, BGML, HGML, and MECL since the year 1990

Explanation: As mentioned in the Working Plan, the gold fields in Gadag were active from the year 1901 to 1911 in various areas involving 50 odd companies, upto the world wars. Very recently the exploratory gold mining work at Gadag was started in 1992 by Hutti Gold Mines which was later shut down due to high carbon and sulphur content in the ore. Most of the areas are now showing regeneration of natural species all around, and Jalligeri forms the core area of Kappathgudda along with surrounding kadkol village.

Although not virgin, it is surrounded by areas which highest regeneration and with increased protection and awareness among the local populace, it will soon return to its pre-mined status.

5. If one has to maintain a fair balance between the forest / wildlife on one hand and the economic benefits of natural resources, on the other, it is advisable to have an authentic data on the quantum of resources available, type of economic activities it will generate and the quantum of economic returns.

Only 6% of total geographical area of Gadag district is under forest cover. In this 6% also there is a large area under encroachments due to FRA applications which have been rejected yet no decision on eviction has been taken by the Government. Fringe areas of the sanctuary is already riddled with problems of over grazing. Stone quarrying and sand mining is already rampant in the Shirhatti and Mundargi talukas of Gadag district.

Kappathgudda is not just any other wildlife sanctuary but an oasis in the vast semiarid landscape of Gadag and Koppal districts. It is the source of water for villages in the foothills and also supplies water to the nearby nallahs which drain into Tungabhadra. It's the lifeline of Gadag district and the mining project has the potential to cause ecological damage beyond repair.

All mining projects have been stopped inside the Kappathgudda Santuary long back which is now getting naturally restored back to its pristine form.

Furthermore, the Hon'ble Supreme Court in its judgement in I.A. No. 1000 of 2003 in the matter of WP (Civil) no. 202 of 1995 dated 3rd June, 2022 has explicitly prohibited any mining activity within National Parks and Wildlife Sanctuaries.

In light of the above observations, arguments and facts I once again strongly recommend rejection of the said mining proposal within Kappathgudda Wildlife Sanctuary, Gadag.

Yours faithfully,

Deputy Conservator of Forests Gadag Division, Gadag

Copy submitted to Principal Chief Conservator of Forests (Forest Conservation), Bangalore for kind information.

-Deputy Conservator of Forests Gadag Division, Gadag