

GOVERNMENT OF KARNATAKA

ಪ್ರಧಾನ ಮುಖ್ಯ ಅರಣ್ಯ ಸಂರಕ್ಷಣಾಧಿಕಾರಿ

(ಅರಣ್ಯ ಪಡೆ ಮುಖ್ಯಸ್ಥರು) ರವರ ಕಛೇರಿ

Office of the
Principal Chief Conservator of Forests
(Head of Forest Force)



ಅರಣ್ಯ ಭವನ, 18ನೇ ಅಡ್ಡರಸ್ತೆ

ಮಲ್ಲೇಶ್ವರಂ, ಬೆಂಗಳೂರು-560 003

AranyaBhavan, 18th Cross
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Old File No. A5(1).MNG.CR.6/2017-18

E office File No. KFD/HOFT/A5-1(MNG)/7/2019-FC

E-72107

Date 13-07-2022

To,

The Additional Chief Secretary to Government
Department of Forest, Ecology and Environment
M. S. Building, Bengaluru

Sir,

Sub: Diversion of 39.90 ha (39.70 ha for Mining Lease and 0.20 ha for Approach Road) of forest land in Sy No. 45, 49 & 50 of Jalligeri village, Kasaba Hobli, Shirahatti Taluk, Gadag District for establishing Sangli Gold Mine in favour of M/s Ramgad Minerals & Mining Limited, Hosapete, Ballari District

Proposal No. FP/KA/MIN/42366/2019[FORM-A]

- Ref:**
1. This office letter of even number dated 15-04-2021/*seeking Stage-I approval*/
 2. Government of Karnataka letter No. FEE 41 FFM 2021 (e) dated 22-09-2021 /*EDS Query raised by GOK uploaded in the web portal on 26-10-2021*/
 3. The Deputy Conservator of Forests, Gadag Division letter No. A1/GFL/B/S.G.M/Jalligeri/CR-1/20-21/2022-23/555 dated 24-06-2022/*EDS reply*/
 4. The Chief Conservator of Forests, Dharwad Circle letter No. A1/GFL /B/S.G.M/Jalligeri/CR-1/2020-21/1820 dated 13-01-2021/*communication of the EDS reply made by the DCF Gadag*/

In response to the proposal submitted by this office vide Ref (1), the Government of Karnataka vide Ref (2), duly enclosing a representation dated 15-07-2021 of the User Agency and has directed this office to re-examine the request of the User Agency and to submit the clear opinion by seeking report from the concerned Chief Conservator of Forests and Deputy Conservator of the Forests for the following factors.

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

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.
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
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.

The same was forwarded to the field officers for which the Deputy Conservator of the Forests, Gadag Division, Gadag vid Ref (3) has once again strongly recommended for rejection of the said mining proposal within Kappatagudda Wildlife Sanctuary, Gadag. The Chief Conservator of Forests has forwarded the letter of Deputy Conservator of Forests to this office. Based on the above, point wise reply for the above factors are as follows:-

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 Sanctuary is 244.15 Sq.km., the buffer forest area 48.87 sq.km and the total proposed ESZ area (*not yet finalized*) 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. 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 large scale Soil Moisture Conservation (SMC) works along with plantation works in the forest area forming part of the Kappatagudda sanctuary. After the introduction of MNREGA, additional SMC works, creation of small water bodies, gully checks, contour trenches and check dams have been undertaken in the forest areas which have improved the soil moisture regime of the same can be seen through excellent regeneration of native species. More so Kappatagudda is the biggest catchment area for Gadag district which already receives less than 700 mm of annual rainfall and is a drought-prone district.

The efforts of the Forest Department of taking up extensive SMC works is already showing results. Thus, presenting a case where mining pits aids in enriching ground water is not an argument which can support permitting of mining activities.

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 reports by the DCF and the Chief Conservator of Forests, several 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 is present in large numbers at Kappatagudda is one of the most endangered animals which was abundant in the past. Due to increased biotic pressure, killing and depletion of prey base, their conservation is now 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. 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, porcupines** etc are also 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 kadmoli 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.**

Explanation: Only 6% of total geographical area of Gadag district is under forest cover. Kappathgudda is not just any other wildlife sanctuary but an oasis in the vast semi-arid 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 Kappatagudda Sanctuary long back which is now getting naturally restored back to its pristine form.

Furthermore, the Hon'ble Supreme Court in its judgment 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 explanation stated above with regard to factors mentioned above and agreeing with the recommendation of the field officers, the proposal is once again strongly recommended for rejection and with the request to forward the same to the Government of India to not to consider the proposal for seeking in-principle (Stage-I approval under the Forest (Conservation) Act, 1980.



Principal Chief Conservator of Forests
(Forest Conservation) & Nodal Officer (FCA)

Copy along with copy of letter referred above communicated to the Deputy Conservator of Forests, Gadag Division, Gadag for information and necessary action.

Copy communicated to the M/s Ramgad Minerals & Mining Limited (RMML) Corporate Office, Baldata Enclave, Aberaj Baldota Road Hospete, Ballari District-583 203 for information.

52-4334389

19925



Karnataka Forest Department

Office of the Chief Conservator of Forests, Dharwad Circle, Dharwad.
Forest Campus, Near K.C.Pack, P.B Road, Dharwad-580008.

Filed

No. A1/GFL/B/S.G.M/Jalligeri/CR-1/20-21/2022-23/555 Date: 26-06-2022.

ಗೆ,

ಪ್ರಧಾನ ಮುಖ್ಯ ಅರಣ್ಯ ಸಂರಕ್ಷಣಾಧಿಕಾರಿಗಳು,
(ಅರಣ್ಯ ಸಂರಕ್ಷಣೆ) ಮತ್ತು ನೋಡಲ್ ಆಫೀಸರ್ (FCA)
ಅರಣ್ಯ ಭವನ, ಮಲ್ಲೇಶ್ವರಂ, 18 ನೇ ಕ್ರಾಸ್,
ಬೆಂಗಳೂರು.

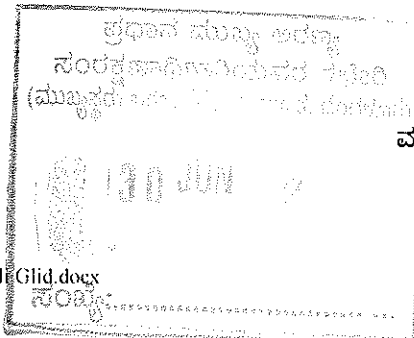
ಮಾನ್ಯರೇ,

Sub: Proposal No. FP/KA/MIN/42366/2019 Diversion of 39.90 Ha (30.70Ha Mining lease and 0.20Ha Approach Road) of forest land in Sy No.45,49 & 50 of Jalligeri Village, Kasaba Hobli, Shirahatti Taluka, Gadag District for establishing of Sangli Gold Mine in favour of Ramagad Minerals & Mining Limited, Hospet, Bellary District.

Ref: 1) ತಮ್ಮ ಕಚೇರಿ ಪತ್ರ ಸಂಖ್ಯೆ: A5(1)/MNG/CR-6/2017-18 E-office file No. KFD/HO/F/A5-1(MNG)/7/2019-FC dated: 09-11-2021.
2) ಈ ಕಚೇರಿ ಪತ್ರ ಸಂಖ್ಯೆ: A1/GFL/B/S.G.M/Jalligeri/CR-1/2020-21 Dated: 20-11-2021.
3) ಉಪ ಅರಣ್ಯ ಸಂರಕ್ಷಣಾಧಿಕಾರಿ, ಪ್ರಾದೇಶಿಕ ವಿಭಾಗ, ಗದಗ ಇವರ ಕಚೇರಿ ಪತ್ರ ಸಂಖ್ಯೆ: A4/GFL/FC/RMML/Mining/39.899 ha./CR-09/2020-21 dated: 06-06-2022.

ಈ ಮೇಲಿನ ವಿಷಯಕ್ಕೆ ಸಂಬಂಧಿಸಿದಂತೆ, ಉಲ್ಲೇಖಿತ (1) ರ ತಮ್ಮ ಕಚೇರಿ ಪತ್ರದಲ್ಲಿ ಮೇಲಿನ ವಿಷಯವಾಗಿ ಉಪಯೋಗಿ ಸಂಸ್ಥೆಯವರ ಕೋರಿಕೆಯ ಕುರಿತು ಪರಿಶೀಲಿಸಿ ವರದಿಯನ್ನು ಸಲ್ಲಿಸಲು ಸೂಚಿಸಿದ ಪ್ರಯುಕ್ತ, ಈ ಕಚೇರಿ ಉಲ್ಲೇಖಿತ (2) ರ ಪತ್ರದಡಿ ಉಪ ಅರಣ್ಯ ಸಂರಕ್ಷಣಾಧಿಕಾರಿಗಳು, ಪ್ರಾದೇಶಿಕ ವಿಭಾಗ, ಗದಗ ಇವರಿಗೆ Proposal No. FP/KA/MIN/42366/2019 Diversion of 39.90 Ha (30.70Ha Mining lease and 0.20Ha Approach Road) of forest land in Sy No.45,49 & 50 of Jalligeri Village, Kasaba Hobli, Shirahatti Taluka, Gadag District for establishing of Sangli Gold Mine in favour of Ramagad Minerals & Mining Limited, Hospet, Bellary District. ಬಗ್ಗೆ ಪರಿಶೀಲಿಸಿ ವರದಿ ಸಲ್ಲಿಸಲು ಸೂಚಿಸಲಾಗಿತ್ತು.

ಅದರಂತೆ ಉಲ್ಲೇಖಿತ (3) ರ ಪತ್ರದಲ್ಲಿ ಉಪ ಅರಣ್ಯ ಸಂರಕ್ಷಣಾಧಿಕಾರಿಗಳು, ಪ್ರಾದೇಶಿಕ ವಿಭಾಗ, ಗದಗ ಇವರು ಸಲ್ಲಿಸಿದ ವರದಿಯ ಪ್ರತಿಯನ್ನು ಈ ಪತ್ರದ ಲಗತ್ತಿಟ್ಟು ತಮ್ಮ ಅವಗಾಹನೆಗಾಗಿ ಹಾಗೂ ಮುಂದಿನ ಅಗತ್ಯ ಕ್ರಮಕ್ಕಾಗಿ ಗೌರವಪೂರ್ವಕ ಸಲ್ಲಿಸಿದೆ.



ತಮ್ಮ ವಿಶ್ವಾಸಿ

ಮುಖ್ಯ ಅರಣ್ಯ ಸಂರಕ್ಷಣಾಧಿಕಾರಿ,
ಧಾರವಾಡ ವೃತ್ತ, ಧಾರವಾಡ.



ಕರ್ನಾಟಕ ಸರ್ಕಾರ

KARNATAKA FOREST DEPARTMENT

ಉಪ ಅರಣ್ಯ ಸಂರಕ್ಷಣಾಧಿಕಾರಿಗಳ ಕಛೇರಿ, ಗದಗ ಖಾತೆ, ಗದಗ. ಜಂಟಿ ಕಛೇರಿ- 582103
Office of the Deputy Conservator of Forests, Gadag Division, Gadag- Binkadakatti- 582103
ದೂರವಾಣಿ ಸಂಖ್ಯೆ: 08372-200289 ಇ ಮೇಲ್ : dyconservatorgadag@gmail.com

No. A4/GFL/FC/RMMI/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 Ramghad Minerals and Mining Ltd. Hospet.
2. Principal Chief Conservator of Forests, (FC) & Nodal Officer (FCA) Bangalore 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 Ramghad 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 Sanctuary 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, porcupines 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 semi-arid 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 Sanctuary 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