



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. 23696 /9F (MG) – 18/2015

Dated, Bhubaneswar the 25/11 November' 2025

From

Dr. K. Murugesan, IFS
Additional Principal Chief Conservator of Forests
(Forest Diversion & Nodal Officer, FC Act)
O/o the PCCF & HoFF, Odisha, Bhubaneswar

To

The Additional Chief Secretary to Government
Forest, Environment & Climate Change Department
Govt. of Odisha, Kharavel Bhawan
Bhubaneswar, Odisha

Sub:- 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 balance forest land of 89.961 ha (fresh area 79.367 ha and 10.594 ha earlier diverted area for renewal and land use change) (originally proposed area of 84.707 ha) in favour of Shri Avin Jain (heir of late Shri DC Jain) for mining of Iron and Manganese Ore in Dalpahar Iron & Manganese Ore Mines located in Baitarani RF-II, District-Keonjhar – Advisory Committee observations/decision dated 14.11.2025 regarding.

Ref:- (i) F.No. 8-31/2015-FC dated 14.11.2025 of the Assistant Inspector General of Forests, Government of India, MoEF& CC (FC Division), New Delhi.
(ii) Memo No. 34266/FE&CC dated 20.11.2025 of the Director, Environment-cum-Special Secretary to Government, FE&CC Department.
(ii) Representation dated 20.11.2025 of the Authorised Signatory, Dalpahar Iron & Manganese Ore Mines, Keonjhar addressed to the Addl. Director General of Forests, MoEF & CC, Gol, New Delhi. (copy enclosed).

Sir,

In inviting a reference to the above mentioned subject, it is to inform that the Advisory Committee vide its meeting held on 27.10.2025 have communicated the following decision vide letter dated 14.11.2025 :-

“Accordingly, keeping in view the recommendations of the Advisory Committee and approval of the same by the competent authority in the ministry, it has been decided that the proposal for diversion of additional 79.367 ha virgin forest land cannot be accepted in the present proposition and the state may therefore restrict the mining operations to the 10.594 ha forest land which has already been diverted”.

Based on the above decision of the Advisory Committee, the authorized signatory of the project proponent addressed to the Addl. Director General of Forests, MoEF & CC, GoI, New Delhi and others has humbly submitted the following points for kind reconsideration of its decision dated 27.10.2025:-

That, the mining operation within the already diverted forest land over 10.594 ha is technically infeasible, operationally unsafe, and inconsistent with scientific mining norms, as supported by authoritative technical evidence, including the independent scientific study conducted by IIT (ISM) Dhanbad. The IIT(ISM) Dhanbad has carried out a study on "Geotechnical Feasibility, Slope Stability Analysis, and Environmental Impact Mechanism Study for Proposed Lateral Mining at Dalpahar Iron and Manganese Ore Mine, Odisha" (enclosed as **Annexure-I**).

Accordingly, the authorized signatory of the project proponent has put forth the following submissions for kind consideration:-

1. Safety and Geotechnical Considerations to ensure secure and efficient mining operations (Supported by IIT-ISM Report)

The IIT(ISM) Dhanbad report states that scientific mining is not feasible within the limited 10.594 ha area due to the following reasons:-

- The existing pit has already reached geotechnical stability limits, and further deepening will create unsafe bench configurations and continuing mining within this confined zone will result in:
 - High bench and slope failure risks, as deepening without lateral expansion will reduce the minimum Factor of Safety (1.5) mandated under DGMS Circular 3/2020.
 - Violation of DGMS Regulation 106(2) (b) of the Metalliferous Mines Regulations, 1961.
 - Increased likelihood of accidents and unsafe working conditions.
- The study concludes that mining in the current diverted area is neither safe nor technically viable, and expansion into the adjoining mineralized zone is essential to maintain slope stability and ensure worker safety. Therefore, our humble request is to allow diversion of additional 79.367 ha for non-forest use for safety and legally compliant mining.

2. Mining of the ore body extending beyond the present broken up area in virgin forest area of 79.367 ha for ecological restorations, resource recovery, economic viability and operational safety vis-à-vis technical Non-Feasibility of Restricting Operations to 10.594 ha.

The authorized signatory of the project proponent has further submitted that, comparatively, controlled lateral (parallel) mining provides wide benches, safer slopes, and improved air-noise dispersion, reduced erosion, and adequate space for essential environmental infrastructure. It would enable phased backfilling, terracing, and continuous reclamation, ensuring

long-term slope stability and ecological restoration. Lateral expansion will also facilitate resource recovery, economic viability, and operational safety.

This later expansion is only possible with the kind permission of Advisory Committee to allow diversion of additional 79.367 ha for non-forest use.

- At the same time, it is informed that 2005 diversion of 10.594 ha was based only on existing old manual workings prior to 1980, not on actual geological continuity based on scientific mining.
- The IIT-ISM technical evaluation and the Approved Mining Plan confirm that:
 - The ore body extends substantially beyond the previously diverted patches and whatever ore remain within the diverted area can't be mined due to the restriction of the Pit boundary within the diverted area only
 - Several patches within the diverted area are exhausted or non-mineralised.
 - Individual patches-seven out of eight being less than 1 ha-are inadequate to support safe or scientific mechanised mining.

Therefore, restricting mining to the existing diverted area would simultaneously result in unscientific, unsafe and economically non-viable operations.

3. Compatibility with the Approved Mining Plan and Statutory Requirements

- The Approved Mining Plan (IBM) mandates integrated development of the mine in the mineralised zone, requiring 34.897 ha by April 2026 for face advancement, haul road development, approach roads to ore zones, Infrastructure such as workshop and office and Overburden handling and reclamation. Confined operations within 10.594 ha will directly contradict this statutory plan, approved by IBM. The plan is enclosed as **Annexure-II**.

Adherence to the IBM-approved plan would require the unbroken forest land of 79.367 ha and compliance to Rule 11 of the MCDR, relating to scientific and systematic mining.

Further, the Deputy Director of Mines, Joda Circle reported that out of the total mining lease area of 89.961 ha (coming under Baitarani Reserve Forest) working is confined in diverted forest area of 10.594 ha (already broken up) which has been divided in to 8 small and scattered blocks, roads and safety zone. Now, working is continuing in 8 pits and working pits have reached their restricted boundaries. Hence, currently there is no scope for lateral or vertical expansion of the above working pits within the existing diverted forest area for achieving the proposed production target without forest clearance for the remaining lease area. He also requested the Mines Manager, Dalpahar Iron and Manganese Mines to obtained forest clearance for remaining part of the lease to avoid the violation. The copy of the letter of DDM, Joda Circle is enclosed as **Annexure-III**.

4. Environmental Implications of Restricted Working

The project proponent has further reiterated that operating only in the existing broken area will increase, rather not decrease, environmental impact:

- Creation of unstable slopes due to forced deepening.
- Poor drainage, erosion, and runoff issues.
- Inefficient waste disposal due to lack of space.
- Inability to execute progressive reclamation or final pit design.

By contrast, controlled expansion into the proposed 79.367 ha will enable:

- Systematic benching and waste management
- Stable slope design
- Proper drainage and erosion control
- Timely reclamation and post-mining restoration.

This approach is more aligned with long-term ecological stability.

4. Socio-Economic and Regulatory Implications of Mining as per the Approved Plan

- The mining operation, when executed as per the approved plan, supports a large workforce across all skill categories. Apart from essential technical personnel such as operators, mechanics, welders, fitters and electricians, the mine provides daily employment to nearly 400 unskilled & semi-skilled workers engaged in ore dressing, sorting of Manganese Ore. Any restriction on the operational area will significantly jeopardise these livelihood opportunities for local communities in the Keonjhar district.

Reduced production will lead to a decline in statutory revenue to the Government of Odisha, including royalty, DMF, NMET, GST and other levies that directly contribute to regional development.

It will also affect compliance with NPV, CAMPA and Compensatory Afforestation commitments already undertaken, which is calculated on the entire forest land in Block "A", including applied forest land of 79.367 ha. The User Agency has deposited **Rs 15,62,13,308/-** as Compensatory levies, NPV and other charges.

- Operational constraints will also restrict the Company's ability to undertake CSR and community development initiatives in nearby villages, thereby depriving local populations of critical support in healthcare, education, drinking water, skill development, and livelihood enhancement programmes.
- Further, restricting mine operations will adversely impact compliance with statutory environmental obligations, including NPV, CAMPA and Compensatory Afforestation commitments that have already been undertaken and financially provisioned.

6. Precedents of Forest Diversion in the Same Landscape that has facilitated in scientific mining and in adding to the economic gain of all the stakeholders.

In similar geo-ecological conditions, large forest diversions have been approved for scientifically managed mines:

- Tata Steel-Joda West Manganese Mine: 436.678 ha
- Tata Steel-Khondbond Iron Mine: 453.150 ha
- Shree Metaliks - Khondbond Iron Mine: 35.774 ha
- OMC-Tiringpahar Iron Mine: 79.300 ha
- OMC Khondbond Iron Mine: 292.578 ha

Dalpahar's proposed diversion of 79.367 ha is modest compared to these precedents and is also proposed to be fully consistent with ecological and regulatory norms applied in the region.

It is pertinent to mention that the Government of Odisha has extended the validity of the entire lease up to 8th June, 2036.

It will not be out of place to mention that over 63% of national manganese demand is import-dependent. And allowing Dalpahar Iron & Manganese Mine to operate on scientifically over the entire lease area of 89.96 ha will reduce the import dependency, ensuring constant supply to the numerous Steel industries of the area.

Based on the facts cited above, it is submitted to kindly move Govt. of India, MoEF & CC, New Delhi for re-consideration of the decision of the Advisory Committee dated 27.10.2025 for diversion of additional 79.367 ha virgin forest land.

Encl: Compliance in two sets

Yours faithfully

Additional Principal Chief Conservator of Forests
(Forest Diversion and Nodal Officer, FC Act)

Memo No. 23697 / Dt. 25-11-2025

Copy forwarded 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 for favour of kind information and necessary action with reference to F.No. 8-31/2015-FC dated 14.11.2025 of the Assistant Inspector General of Forests, Government of India, MoEF& CC (FC Division), New Delhi.

Additional Principal Chief Conservator of Forests
(Forest Diversion and Nodal Officer, FC Act)

Memo No. 23698 / Dt. 25-11-2025

Copy forwarded to the Regional Chief Conservator of Forests, Rourkela Circle for information and necessary action with reference to Memo No. 34269/FE&CC dated 20.11.2025 of the Director, Environment-cum-Special Secretary to Government, FE&CC Department.

Additional Principal Chief Conservator of Forests
(Forest Diversion and Nodal Officer, FC Act)

Memo No.

23699 /Dt. 25-11-2025

Copy forwarded to the Divisional Forest Officer, Keonjhar Forest Division for information and necessary action with reference to Memo No.34269/FE&CC dated 20.11.2025 of the Director, Environment-cum-Special Secretary to Government, FE&CC Department.

✓ 25/11/2025
Additional Principal Chief Conservator of Forests
(Forest Diversion and Nodal Officer, FC Act)

Memo No.

23700

/Dt.

25-11-2025

Copy forwarded to Avin Jain, POA, C/o Dharmandh Jain (Mining Lessee), Dharam Villa, 12-A, Mahatma Gandhi Marg, Ring Road, Lajpat Nagar IV, New Delhi-110024 for information and necessary action with reference to F.No. 8-31/2015-FC dated 14.11.2025 of the Assistant Inspector General of Forests, GoI, MoEF & CC (FC Division), New Delhi Memo No. 34270/FE&CC dated 20.11.2025 of the Director, Environment-cum-Special Secretary to Government, FE&CC Department.

✓ 25/11/2025
Additional Principal Chief Conservator of Forests
(Forest Diversion and Nodal Officer, FC Act)