

**Government of India**  
**Ministry of Environment, Forest and Climate Change**  
**(Forest Conservation Division)**

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**Indira Paryavaran Bhawan,**  
Jor Bag Road, Aliganj,  
New Delhi – 110003

**Dated: February, 2024**

To,

**The Principal Secretary (Forests),**  
Government of Madhya Pradesh,  
Bhopal.

**Subject: Diversion of 1397.54 ha forest land out of which 1335.35 ha Reserved forest land (RF) in various forest compartments and 62.19 ha Revenue forest in various Khasra's of Forest Range Waidhan/ Sarai East for Open Cast Dhirauli Coal Mine Project in favour of M/s Stratatech Mineral Resources Private Limited under Singrauli Forest Division, Singrauli District of Madhya Pradesh State (Online No. FP/MP/MIN/142344/2021) - reg.**

Madam/Sir,

I am directed to refer the APCCF (LM) and Nodal Officer, FCA, 1980, Govt. of Madhya Pradesh letter No. F-1/845/2023/10-11/492 dated 22.01.2024 forwarding a fresh proposal on the above subject seeking prior approval of the Central Government under section 2 (1) (ii) of the Van (Sanrakshan Evam Samvardhan) Adhiniyam, 1980. After examining the proposal, the following shortcomings have been observed:

- i. Calculated area of Shape file/ KML file of Forest land proposed for diversion within the mining lease is found 1601.058 Ha (software calculated). However, instant proposal has been submitted for diversion of 1397.54 ha forest land only.
- ii. The Sanjay Dubri Wildlife Sanctuary is located at a distance of 10.07 Km from the proposed forest land for diversion. Moreover the State Govt. informed that the proposed area is falling within the 1 km of the elephant corridor as per the prevailing working plan for the period 2019-20 to 2028-29. Further, movement of leopard (Tendua) reported in the SIR of the DFO, Singrauli. Therefore, the comments from CWLW along with proposed mitigation measures need submission.
- iii. The proposed forest land is having density of forests ranging from 0.4 to 0.6 density wherein 5,70,666 no. of trees are estimated to be affected from the proposed activities. The detail of the forest crops and diameter classes of valuable trees estimated needs to be elaborated and phase wise felling details should also be indicated.
- iv. The method of mining has been reported in the online application as Opencast + Underground. However the State Govt. in their reference letter has mentioned the same as open cast method of mining. The state govt shall therefore examine the same and report whether the proposal is for underground mining, open cast mining or both. The detail of area proposed for OCP and underground mining including the component wise KML file shall be submitted.
- v. As per DSS analysis the proposed area is falling in Inviolable or In High conservation zone value (HCV) with majority area falling in Very Dense Forest category. The state shall submit the justification for proposing such pristine area

for mining. Further, keeping in view the conservation value of the area, the state shall intimate whether any impact assessment/biodiversity study taking into account the impact of mining has been carried out or not. If so the details be provided.

- vi. Satellite imagery and Land use plan submitted by the user agency reveals that there are five (5) transmission lines which are passing through the proposed forest land for diversion. The copy of approvals granted under Van(Sanrakshan Evam Samvardhan), Adhinyam, 1980 along with NoC from concerned agencies to shift the power lines from the proposed area have not been submitted. The state shall therefore submit the copy of approvals under Van(Sanrakshan Evam Samvardhan), Adhinyam, 1980 and the copies of NOC from the concerned agencies. The state shall also intimate whether any additional forest land would be required for the shifting of transmission lines or not along with details.
- vii. Presence of water bodies like Nala/ Tributary are also visible in the proposed forest land. The state shall submit the detail of mitigation measures in this regard along with the NoC/permission from the concerned department.
- viii. The proposal involves diversion of 1397.54 ha forest land out of which 225.4 ha has been proposed for external dumping and 6.3 ha has been earmarked for infrastructure which are non-site specific. The details of total overburden area in the proposal involving both forest as well as non forest land has not been submitted, which is required to be done. The state shall also explore the possibility of shifting of these components on non-forest land.
- ix. As per the component wise breakup an area of 67.11 ha is designated as undisturbed area. The purpose and reason for including the same in the instant proposal has not been submitted.
- x. Compensatory Afforestation has been proposed in total 45 patches comprising an area of 1397.523 ha wherein two CA patches namely Village Imlipura, Khasra No 2 and 19, Shivpuri District are falling in the Forest compartment boundary as per DSS analysis. Moreover, these two patches are also located in Tiger corridor. The state shall examine the matter and ensure to provide NFL for CA as per guidelines. The CA sites namely Village - Dhandheda Kanad (Kh No 102,80,139,103), Village - Raipuria (Kh No 78, 128 and 105) are located on the earthen dam, which may not be suitable for raising CA and the land may not be free from all encumbrances. Further, the documentary evidence of proposed CA site namely Village: Raghunathapura (Survey No. 3), Shivpuri District revealed that the ownership of land is with the Forest Department. The state shall examine the issues as above and ensure that all the CA areas are suitable, free from encumbrances and eligible for the purpose of CA as per prescribed guidelines.
- xi. Mode of mineral/ coal transportation route and how the requirement of electricity and water will be met has not been given in the proposal. The state shall therefore submit the detailed mineral evacuation plan along with the details as to how the requirement of electricity and water would be met. The detail of additional forest land required for the purpose(if any) shall also be submitted.
- xii. In accordance with the Para 7.8(i) of Chapter 7 of the consolidated guidelines and clarification issued under Van (Sanrakshan Evam Samvardhan) Adhinyam, 1980 and Van (Sanrakshan evam Samvardhan) Rules, 2023, the State govt shall give the justification for the necessity of opening the new mining lease along with details.
- xiii. The Quantitative values on the parameters such as Cost of Human resettlement, Loss of public facilities has not be ascertained in the Cost-Benefit analysis, which is required to be done.
- xiv. As per the SIR of the DFO, Singrauli Divison, rights of 49 leaseholder have been

recognized in the proposed area. The state shall submit details of the same and status of R&R plan.

- xv. As per the 3-D subsidence prediction study report Maximum tensile strain reported in the proposed area is 17.47. The state shall examine the same and submit its comments in case the proposal is for underground mining only.

Accordingly, it is requested to furnish the above mentioned information to this Ministry for further consideration of the proposal.

Yours sincerely,

Sd/-

(Suneet Bhardwaj)

**Assistant Inspector General of Forests**

**Copy to:**

1. The PCCF (HoFF), Department of Forest, Government of Madhya Pradesh, Bhopal;
2. The Dy. DGF (Central), Regional Office, MoEF&CC, Bhopal;
3. The Nodal Officer (FCA), Department of Forest, Government of Madhya Pradesh, Bhopal;
4. User Agency;
5. Monitoring Cell, FC Division, MoEF & CC, New Delhi for uploading on PARIVESH portal.