

ಕರ್ನಾಟಕ ಸರ್ಕಾರ

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

Aranya Bhavan, 18th Cross
Malleshwaram, Bengaluru-560 003
Telephone : 080 2334 6472
Email : apccffc@gmail.com

Old File No. A5(1).MNG.CR.6/2017-18
E office File No. KFD/HOFF/A5-1(MNG)/7/2019-FC

E-72107
Date 04-02-2023

To,

✓ The Chief Conservator of Forests
Dharwad Circle, Dharwad


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 05-05-2021 [submission of the FC proposal for rejection] and letter dated 13-07-2022 [submission of the opinion to GoK w.r.t representation made by the User Agency vide letter dated 15-07-2021]
2. Government of Karnataka letter No. FEE 41 FFM 2021 (e) dated 22-09-2021 [EDS Query raised by GOK seeking to submit the opinion w.r.t representation made by the User Agency vide letter dated 15-07-2021] and 20-01-2023 [EDS Query raised by GOK seeking to submit the opinion w.r.t representation made by the User Agency vide letter dated 15-07-2021]

In response to the proposal submitted vide Ref (1) letter dated 05-05-2021 and EDS reply dated 13-07-2022 regarding submission of the opinion with respect to the representation made by the User Agency vide letter dated 15-07-2021, the Government of Karnataka vide Ref (2) letter dated 20-01-2023, duly enclosing a representation dated 26-07-2022 of the User Agency, has once again directed this office to examine the request of the User Agency (copy enclosed).

Therefore, you are requested to examine the request of the User Agency and to submit your opinion at the earliest as sought by the Government of Karnataka.


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, Baldota Enclave, Aberaj Baldota Road Hospete, Ballari District- 583 203 for information.

(13)

-58084



ಕರ್ನಾಟಕ ಸರ್ಕಾರ

S-5387043

ಸಂಖ್ಯೆ: ಅಪಜೀ 41 ಎಫ್‌ಎಫ್‌ಎಂ 2021

ನೋಂದಾಯಿತ ಅಂಚೆ, ಸ್ವೀಕೃತಿ ಬಾಕಿ

ಕರ್ನಾಟಕ ಸರ್ಕಾರ ಸಚಿವಾಲಯ

ಬಹುಮಹಡಿಗಳ ಕಟ್ಟಡ

ಬೆಂಗಳೂರು, ದಿನಾಂಕ:20-01-2023.

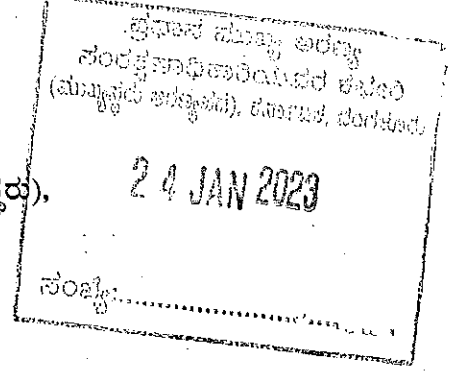
ಇವರಿಂದ:

ಸರ್ಕಾರದ ಅಪರ ಮುಖ್ಯ ಕಾರ್ಯದರ್ಶಿ,
ಅರಣ್ಯ, ಪರಿಸರ ಮತ್ತು ಜೀವಶಾಸ್ತ್ರ ಇಲಾಖೆ,
ಬಹುಮಹಡಿಗಳ ಕಟ್ಟಡ, ಬೆಂಗಳೂರು-560001.

ಇವರಿಗೆ:

ಪ್ರಧಾನ ಮುಖ್ಯ ಅರಣ್ಯ ಸಂರಕ್ಷಣಾಧಿಕಾರಿ (ಅರಣ್ಯ ಪಡೆ ಮುಖ್ಯಸ್ಥರು),
ಅರಣ್ಯ ಭವನ, ಮಲ್ಲೇಶ್ವರಂ,
ಬೆಂಗಳೂರು-560003.

ಮಾನ್ಯರೇ,



ವಿಷಯ: 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

- ಉಲ್ಲೇಖ: 1. ತಮ್ಮ ಕಛೇರಿಯ ಪತ್ರ ಸಂಖ್ಯೆ: KFD/HOFF/A5-1(MNG)/7/2019-FC, ದಿನಾಂಕ:05-05-2021
2. M/s RAMGAD MINERALS & MINING LIMITED, Hosapete ಇವರ ಪತ್ರ ದಿನಾಂಕ:26-07-2022

ಮೇಲ್ಕಂಡ ವಿಷಯಕ್ಕೆ ಸಂಬಂಧಿಸಿದಂತೆ, ಉಲ್ಲೇಖಿತ ಪತ್ರದ ಕಡೆ ತಮ್ಮ ಗಮನ ಸೆಳೆಯುತ್ತಾ, ಉಲ್ಲೇಖಿತ (2)ರ ಉಪಯೋಗಿ ಸಂಸ್ಥೆಯ ಮನವಿಯನ್ನು ಇದರೊಂದಿಗೆ ಲಗತ್ತಿಸಿದೆ. ಪ್ರಸ್ತಾಪಿತ ಪ್ರದೇಶವು ಕಪತುಗುಡ್ಡ ವನ್ಯಜೀವಿ ಧಾಮದ ವ್ಯಾಪ್ತಿಗೆ ಒಳಪಡುವುದರಿಂದ ಪ್ರಸ್ತಾವನೆಯನ್ನು ತಿರಸ್ಕರಿಸುವಂತೆ ಉಲ್ಲೇಖಿತ (1)ರ ಪತ್ರದಲ್ಲಿ ತಿಳಿಸಲಾಗಿದೆ.

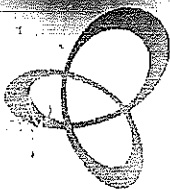
ಈ ಸಂಬಂಧ ಉಪಯೋಗಿ ಸಂಸ್ಥೆಯವರು ಸಲ್ಲಿಸಿರುವ ಉಲ್ಲೇಖಿತ (2)ರ ಮನವಿಯ ಪ್ರತಿಯನ್ನು ಇದರೊಂದಿಗೆ ಲಗತ್ತಿಸುತ್ತಾ, ಪ್ರಸ್ತಾವನೆಯನ್ನು ಮತ್ತೊಮ್ಮೆ ಪರಿಶೀಲಿಸಿ, ಸಮಂಜಸವಾದ ಸ್ಪಷ್ಟ ಅಭಿಪ್ರಾಯ/ವರದಿಯನ್ನು ಕೂಡಲೇ ಒದಗಿಸುವಂತೆ ಕೋರಲು ನಿರ್ದೇಶಿಸಲ್ಪಟ್ಟಿದ್ದೇನೆ.

ತಮ್ಮ ನಂಬುಗೆಯ

(ಎಂ. ಕುಂಜನಾಥ) 20/1/2023

ಸರ್ಕಾರದ ಅಧೀನ ಕಾರ್ಯದರ್ಶಿ

ಅರಣ್ಯ, ಜೀವಪರಿಸ್ಥಿತಿ ಮತ್ತು ಪರಿಸರ ಇಲಾಖೆ (ಅರಣ್ಯ-ಸಿ)



BALDOTA
WE ARE LIFE

HH73H15
E- 26/07/2022

RAMGAD MINERALS & MINING LIMITED

Regd. & Corp. Office, Baldota Enclave, Abheraj Baldota Road, Hosapete - 583 203, Karnataka, India.
Office : +91 8394 232002, 232003 Fax : +91 8394 232444
Email: email@rmml.in
CIN U27101KA1978PLC003360

July 26, 2022

The Additional Chief Secretary – Forest, Ecology and Environment
Government of Karnataka, MS Building,
Bangalore – 560001.

Dear Sir,

Sub: Submissions to supplement the application to consider our Forest Clearance Proposal over an extent of 39.90 hectares for gold and associated minerals in Gadag district.

The National Mineral Policy, 2019 of the Government of India has been encouraging private participation in the exploration and mining of gold and other precious minerals, and in view of the Country's dependence on import of Gold to meet the demand thereby spending considerable foreign exchange.

Accordingly, we, M/s Ramgad Minerals & Mining Ltd. (RMML) decided to enter into the field of exploration and mining of Gold and associate minerals and had applied for a Reconnaissance Permit over an extent of 1233 sq.km in Gadag, Bellary and Haveri districts for Gold and associated minerals under rule 4 of MCR, 1960. The Reconnaissance Permit (RP) was granted during the year 2001 vide Govt of India approval No. 4/108/2000 M.IV dated 29.12.2000 and State Govt Order No. CI 88 MMM dated 18.04.2001. Since a part of the Reconnaissance Permit area was within reserved forest, the Deputy Conservator of Forest, Gadag, granted permission to carry our reconnaissance activity in the forest area, vide File No.D3/GFL/Msc/CR/2001-02 dated 27.09.2001. RMML made substantial investments in the reconnaissance work over the three year period and successfully completed the work.

RMML subsequently applied for prospecting licenses and a Mining Lease over the said portions of the area granted under reconnaissance permit. Of the 10 PLs, two were granted during 2009. After detailed exploration, a further eight mining leases (MLs) were applied for in 2012 i.e. before the expiry of granted prospecting licenses.

One mining lease over an extent of 39.70 ha was also applied for during 2004 and the same was granted in 2008 vide State Govt Order No. Cl:80: MMM:2005 dated 09.05.2008 after prior approval from Ministry of Mines, Government of India under Section 5(1) of MMDR, 1957 vide GOI No. 4/59/2006 M.IV dated 29/06/2006.

As Forest Clearance (FC) is prerequisite for execution of mining lease, RMML has applied for a Forest Clearance for diversion of forest land over an extent 39.90 hectares under Section 2 of Forest (conservation) Act 1980 on 14.11.2006. The proposal was evaluated at all levels and Conservator of Forests (CF), Dharwad, recommended the FC proposal on 27.08.2010 vide letter No: INS/MNG/GFL/GL/Ramgad/CR-91/09-10/1229. Thereafter the following events took place:

1. The forest department in the year 2013 considered declaring Kappatagudda Reserve Forest as Kappatagudda Wildlife Sanctuary aiming to protect the medicinal plants being noticed over an extent of about 90 hectares.
2. A meeting was called by the Forest Department, in association with the State Wildlife Board to elicit public opinion on the proposal at Dambal, Mundarigi taluk on 21.02.2013 which witnessed vociferous protests and opposition by the people from Kappatagudda. Villagers vehemently opposed the possible eviction, dislocation and loss of agricultural lands. The meeting witnessed pandemonium and uproarious scenes with high emotional outbursts from the participants. This was prominently reported in the major daily newspapers, that more than 100 social, cultural, educational and non-governmental organizations opposed the proposal by submitting memorandum to the various concerned government authorities and staging protests.
3. Later there were several rounds of field visits and correspondences in recommending / rejecting the proposal viewing that the area was likely to be declared a wildlife sanctuary.
4. Government of Karnataka dropped the proposal of declaring Kappatagudda as wildlife sanctuary vide letter No. APG/259/FWL/2011 dated 27.05.2014 and No. APG/32/FFM/2013 dated 23.09.2014 after the situation witnessed in Public Consultation on 21.02.2013.



5. After reviewing above situation, State Government communicated to the PCCF to re-examine the proposal in grant of Forest Clearance vide No. APG/259/FWL/2011 dated 27.05.2014 and APG/32/FFM/2013 dated 23.09.2014.
6. Government of Karnataka bowed before the vested interest lobby and declared Kappatagudda as "Kappatagudda Conservation Reserve" over an extent of 17, 872.248 hectares vide Gazette Notification No. FEE 291 FWL 2015 dated 19.12.2015 in spite of public opposition.
7. RMML gave a representation before the Government of Karnataka expressing its concern over the area being declared a Conservation Reserve.
8. Later realizing their mistake and due to pressure from the locals, Government of Karnataka withdrew the above Notification vide No. FEE 291 FWL 2015 dated 04.11.2016.
9. Again due to the pressure of vested interest lobby and by organizing a managed public hearing, Government of Karnataka declared the Kappatagudda Reserve Forest as "Kappatagudda Conservation Reserve" over an extent 17, 872.248 hectares vide Gazette Notification No. FEE 291 FWL 2015 dated 11.04.2017.
10. The Conservation Reserve was then declared 'Kappatagudda Wildlife Sanctuary' without calling for public hearing or any intimation to the stake holders vide Notification No. FEE 57 FWL 2019 dated 16.05.2019.
11. There was enormous delay from forest department in processing the FC application. Due to change in procedural aspects from offline FC application system to online FC proposal system by the Ministry of Environment and Forest and also change in land status from 'Kappatagudda Reserve Forest' to 'Kappatagudda Conservation Reserve' back to 'Kappatagudda Reserve Forest' and subsequently as 'Kappatagudda Wildlife Sanctuary', RMML was forced to file and withdraw the online FC application multiple times.

RMML had invested more than Rs.300 Crores (in present cost) towards land and machinery and the project will provide once completed will provide employment to approx.. 5000 persons directly and indirectly. Accordingly, RMML made a representation to the Chief Secretary, Government of Karnataka on 15.07.2021 to direct the State forest department to review our proposal over an extent of 39.90 hectares. The Chief Secretary was kind to direct the forest department to review the



proposal. Accordingly, the proposal was sent back to DCF, Gadag to send her comments.

However, the DCF, Gadag did not recommend the proposal in her letter No. A4/GFL/FC/RMML/Mining/39.899 ha/CR-09/ 2020-21 dated 06.06.2022 and same has been forwarded by the CCF, Dharwad vide No. A1/GFL/B/SGM/Jelligeri/CR/20-21/22-23/555 dated 24.06.2022.

RMML submissions for supporting granting of the Forest Clearance

I. There are very limited reserves of Gold in the country

1. Karnataka State is the only potential producer of Gold and mineral resources are site specific.
2. ~~Gold is a very strategic metal, there is a huge demand for gold in India.~~
Consequently, huge quantity of gold is imported and it is a drain on the Foreign Exchange of country. Hence, gold mining is the need of hour and strategic requirement as a part of economy development. It will give lot of impetus to the local economy and employment in industrially backward district of Gadag. Further, Gold mining involves underground mining with minimum breaking of land, trees to be cut are negligible, equivalent land will be provided along with 5 times of NPV and compensatory afforestation charges for development of forest at alternative land. Mining is based on sustainable development principle.
3. RMML's PL and ML applied areas is not a virgin area. Kappatagudda has an ancient history of gold mining. The Britishers operated gold mining in this area as far back as 1900. Post-independence, the area has seen intermittent mining by Hutti Gold Mining Limited (HGML) and Bharat Gold Mining Limited (BGML). Knowing the economic importance of gold, Mineral Exploration Corporation Limited (MECL) and State Director Mines and Geology (DMG) have also explored this area. Thus the said area is a part of the explored and gold extracted areas.

II. The proposed FC area are on the fringes of the Sanctuary and the area is less than 0.5% of the Kappatagudda Wildlife Sanctuary, ESZ and Buffer Recorded Forest area

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4. The ML granted area falls in the fringes of Kappatagudda wildlife Sanctuary. The mining lease area is not even 0.5% of Kappatagudda Wildlife Sanctuary, ESZ and Buffer Recorded Forest area.
5. The area applied for FC 39.90 hectare shall be in micro scale compared with 6% of forest cover of Gadag district. RMML reiterates that, there is no unauthorised agriculture practice in 39.90 hectares. The comments made by the DCF, Gadag on encroachments and FRA matters are out of RMML's scope purview. Sustainable Mining and Environment Management should go hand in hand.

III. Other approvals have been granted to the mining project

6. The project has been accorded the following approvals since:
 - a. Prior approval from Ministry of Mines, GOI No. 4/59/06 M.IV dated 29.06.2006
 - b. The mining plan was approved by the Indian Bureau of Mines vide No. MP/MECH-48(KNT)/GOA/2007-08 dated 30.07.2007
 - c. Mining lease grant No. CI:80: MMM:2005 dated 09.05.2008
 - d. Environmental Clearance No. J – 11015/1140/2008-1A. II (M) dated 10.12.2009.
 - e. MOU signed during Global Investors Meet dated 08.06.2012
 - f. Consent for Establishment was also obtained from Karnataka State Pollution Control Board (KSPCB) vide order No. 130/PCB/MIN/CFE/2013-14/1627 dt 14 Mar 2013
 - g. SHLCC extension of time vide No. CI 222 SPI 2020 (E) dated 19.09.2020.

Therefore, only the Forest Clearance remains pending now.

7. RMML holds the preferential rights over proposed ML under section 10A (2) (b) of MMDR Amended Act 2015. They are in process with mines and geology and the forest department.

IV. The gold mining shall be carried out in a sustainable manner and in harmony with the natural surroundings

8. The Company will adopt state-of-the-art opencast mining methods in protecting the environment of this region.



9. Open mining pit acts as a surface water body serving the requirement of Flora and Fauna of that region. This shall be a natural gully check and ground water recharge point.
10. RMML has mutated C & D equivalent land to DCF, Gadag, for compensatory afforestation for diversion of 39.70 hectares, in Sy No. 262/A in Arasanalu village, Harappanahalli taluk of Davangere district on the 24/03/2012.
11. This project will help in improving the financial conditions, providing employment and uplifting the economic status of the surrounding villages.
12. The soil erosion predicted by the Dy. Conservator of Forest is an imaginary theory. A mining project is a repository for catchment of surface water and enriches the groundwater level. Mining pit acts as gully point for soil erosion as it's located in the foothill of Kappatagudda.
13. There are no encroachments and unauthorized agriculture and forest dwellers within the FC applied area. Hence, remarks made by the DCF, Gadag on encroachments and FRA is not applicable to this proposal.

V. Gold Mining in the proposed FC Area shall not adversely impact the flora and fauna. The fauna in the region is commonly found across the country and there are no medicinal plants in the ML granted area

14. The area sought for forest diversion is bare miniscule and doesn't fall within the core of sanctuary. The proposed FC area falls in the fringes of Kappatagudda Wildlife Sanctuary. Therefore, restricting or obstructing the wildlife movement doesn't arise.
15. ML granted area is devoid of any thick forest and wildlife. Vegetation in the proposed mining lease area is scanty. This area was earlier held under BGML/HGML gold mining leases which were later abandoned.
16. Flora and Fauna in the FC applied area is meagre. Wildlife mentioned in Kappatagudda are projected as if whole wildlife is sheltered within 39.90 hectares. Most of the wildlife mentioned are common species, and anticipating a threat to them due to 39.90 hectares of mining is ludicrous.
17. The species mentioned by the DCF, Gadag are common species found across the State / Country in any forest region. There are no unique species in Kappatagudda which are not seen other parts of Karnataka. Nationwide number of mining leases are spread in various forest covers of different States.



Kappatagudda is also one among them. Mining activity will never hinder the wildlife. Gir Lion Sanctuary, Gujarat; Gumti Wildlife Sanctuary, Tripura; Trishna Wildlife Sanctuary, Tripura; Gangaikondam Spotted Deed Sanctuary, Tamil Nadu, Udhuwa Lake Bird Sanctuary, Jharkhand; Todgarh Raoli Wildlife Sanctuary, Rajasthan etc, are just a few examples.

18. The medicinal plantation zone identified by the forest department is about 4 km from the ML granted area. Identified medicinal plantation area is in the central part of Kappatagudda, whereas ML granted to RMML is in the fringes of Kappatagudda.

19. Tropical Dry Deciduous Forest are exposed to arid temperature. District Census Handbook of Gadag of year 2011 edition depicts a large portion of the forests of the district belong to scrub category. The scrub forest offers a few more stern and drier landscape. Under the influence of dry climate and a very inferior soil, several of the shrubs have economic utility and the grass land patches provide inferior grassing for sheep. The same book also depicts the status of fauna as '...It has not been recorded in the recent years and are in all probability extinct'. The medicinal plants region is in the central part of Kappatagudda Wildlife Sanctuary and is quite far from proposed mining project. There are similar kind of forests in India where mining is operational viz Karnataka, Odisha, Andhra Pradesh, Telangana, Madhya Pradesh, Jharkhand etc.

20. There is no prohibition of mining in ESZ and wildlife sanctuaries subject to the approval of National Board of Wildlife. Government of India has cleared more than 680 projects in wildlife sanctuaries, protected areas and eco sensitive zones in the past 7 years as per the guidelines No. F. No. 6-10/2011 WL dated 19th December 2012. *Annexure – news report*

VI. RMML has already made a sizeable investment in Gold mining in the area.

21. In order to save time, in the year 2012 RMML got approval of the State High Level Clearance Committee (CI 172 SPI 2012 dt 25.05.12) for establishing a Gold Ore Processing plant. RMML also signed an MOU with the Government of Karnataka at the Global Investors' Meet on 08.06.2012.

22. RMML obtained Environmental Clearance from Ministry of Environment and Forest in the year 2009 (F. No. J-11015/1140/2008-IA.II (M) dt 10.12.09).

23. RMML obtained Consent for Establishment (CFE) from Karnataka State Pollution Control Board (KSPCB) vide letter No. 130/PCB/MIN/CFE/2013-14/1627 dt 14 Mar 2013.

24. Being optimistic and being a step away from execution of mining lease, Company commenced the erection of the processing plant with investment to the tune of Rs. 300 crores.

VII. RMML has an expertise in the area and is a reliable and responsible entity.

25. RMML which is a leading Company of Baldota group. The group is engaged in diversified businesses since 1962 in mineral exploration, Mining, Pelletization, Beneficiation, Wind Power, Environmental Solutions, Gases, Aviation, Shipping etc. It has an excellent track record in exploration, sustainable mining, wind energy and in manufacturing industrial gases. The mentioned mining lease was granted by the Government of Karnataka in the year 2008 after detailed exploration by the Company since its reconnaissance permit (RP) period during year 2001.

26. RMML has been invited in Global Investor Meet and a MoM has been signed during 2012.

27. RMML will also join hands with the forest department in developing environment conservation works as a part of its Corporate Social Responsibility.

VIII. Other similarly situated mining projects have been granted clearance and similar proposals have been recommended by the Government.

Knowing the importance of mining and its GDP contribution to the Nation, the Government of India has cleared a plethora of projects in wildlife and protected areas in past 5 years.



A. Below is a table illustrating the clearances granted by the Government.

S. No.	Project	Sanctuary / National Park	Approved Year
1	Diversion of 11.9328 ha Forestland and	Gumti Wildlife Sanctuary Tripura State <i>ANNEXURE for Gumti - Minutes of the 51st Meeting of NBWL</i>	31-01-2019
	Diversion of 2.6310 ha of Non-Forest land (For Construction of 133 kV Single Circuit Transmission Line from Ganganagar 33 kV Sub-station to Barabari)	Draft ESZ of Gumti Wildlife Sanctuary Tripura State	31-01-2019
2	Diversion of 0.646371 ha of Forestland and	Trishna Wildlife Sanctuary Tripura State	31-01-2019
	Diversion of 9.318984 ha Forestland (For Collection and Transportation of Natural Gas Underground Pipeline from Gojalia – GCS to OTPC – Palatana.	Draft ESZ of Trishna Wildlife Sanctuary Tripura State	31-01-2019
3	Diversion of 1.42 ha of Forestland for Construction of Drill site, Waste pit and Approach Road	Trishna Wildlife Sanctuary Tripura State	31-01-2019
4	Diversion of 1.112 ha of Forestland and 0.404 ha of Non-Forestland for Construction of Drill site, Waste pit and Approach road for the location TIDD project	Trishna Wildlife Sanctuary Tripura State	31-01-2019
5	Diversion of 1.367 ha of Forestland for Construction of Drill site, Waste pit and Approach road	Trishna Wildlife Sanctuary Tripura State	31-01-2019
6	Diversion of 1.76 ha of Forestland for Construction of Drill site, Waste pit and Approach road	Trishna Wildlife Sanctuary Tripura State	31-01-2019
7	Diversion of 1.96 ha of Forestland for Construction of Drill site, Waste pit and Approach road for the location TIDF project	Trishna Wildlife Sanctuary Tripura State	31-01-2019
8	Diversion of 1.496 ha of Forestland for Construction of Drill site, Waste pit and Approach road for the location of TIDE project	Trishna Wildlife Sanctuary Tripura State	31-01-2019

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9	Proposal use of 16.9968 ha of Revenue land for Construction of IOCL's Indane Bottling Plant at S.F Nos.B37/pt to B-43/pt, B50/pt, B51/pt, C30 to C41, C24/pt to C27/pt	SIPCOT Industrial Growth Centre, Gangaikondan Village, Tirunelveli Taluk & District, Tamil Nadu State	29-08-2019
10	Proposal for Black Granite Quarry in an Extent of 0.760 ha	Krishnagiri District, Denkanakottai Taluk, Tamil Nadu State	29-08-2019
11	Black Granite (Dolerite) Quarry in an Extent of 1.685 ha	Krishnagiri District, Denkanakottai Taluk, Tamil Nadu State	29-08-2019
12	Proposal for Black Granite Quarry for over an extent of 2.860 ha	Eruthukottai Village Denkanikottai Taluk Krishnagiri District Tamil Nadu State	29-08-2019
13	Proposal for Construction of building in the private land of 1.714 ha	Mallanguzhi Village Thalavadi Taluk Erode District Tamil Nadu State	29-08-2019
14	Proposal for Construction of building in the private land of 0.180 ha	Mallanguzhi Village Thalavadi Taluk Erode District Tamil Nadu State	29-08-2019
15	Proposal for Construction of building in the private land of 0.8250 ha	Thirunarai Village, Thalavadi Taluk Erode District Tamil Nadu State	29-08-2019
16	Proposal for construction of building in the private land of 0.3594 ha	Mallakuzhi Village Thalavadi Taluk, Erode District Tamil Nadu State	29-08-2019
17	Proposal for construction of building in the private land of 1.1250 ha	Mallanguzhi Village Thalavadi Taluk, Erode District Tamil Nadu State	29-08-2019
18	Proposal for construction of building in the private land of 1.260 ha	Mallanguzhi Village Thalavadi Taluk, Erode District Tamil Nadu State	29-08-2019
19	Proposal for construction of building in the private land of 0.5358 ha	Mallanguzhi Village Thalavadi Taluk, Erode District Tamil Nadu State	29-08-2019
20	Proposal for construction of building in the private land of 0.3789 ha	Mallakuzhi Village Thalavadi Taluk, Erode District	29-08-2019

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		Tamil Nadu State	
21	Proposal for construction of building in the private land of 3.5872 ha	Mallakuzhi Village Thalavadi Taluk, Erode District Tamil Nadu State	29-08-2019
22	Proposal for construction of building in the private land of 1.260 ha	Mallanguzhi Village Thalavadi Taluk, Erode District Tamil Nadu State	29-08-2019
23	Diversions of 1007.29 ha of Forestland for Construction of North Koel Reservoir Project, Dist. Latehar, Jharkhand	Palamau Tiger Reserve Jharkhand State	30-11-2018
24	Proposal for diversion of 4.117 ha of Forestland for Construction / Widening of 4/6 laning of Rargaon to Jamshedpur (Total Length 80 km) on NH-33.	Dalma Wildlife Sanctuary Jharkhand State	30-11-2018
25	Proposal for diversion of 0.267 ha of Forestland for Construction of Nature & Wildlife Awareness Centre in Koderma	Koderma Wildlife Sanctuary Jharkhand State	30-11-2018
26	Mining of silica and china clay in the private land of an area 7.12 ha - Saidpur Bujrug China Clay and Silica Sand Mine in Mouza Saidpur, Bujrug-21, P.S.Rajmahal, Plot No.402, District Sahebgunj, Jharkhand	Udhuwa Lake Bird Sanctuary Jharkhand State	30-11-2018
LIST OF PROPOSALS SUBMITTED ONLINE			
27	FP/TR/MIN/13521/2015 – Drilling of location TIDD – Mining – ONGC – 1.514 ha	Tripura State	Disposed on 5-2-2019
28	FP/TR/MIN/13525/2015 – Drilling of location TIDE – Mining – ONGC – 1.496 ha	Tripura State	Disposed on 5-2-2019
29	FP/TR/MIN/13527/2015 – Drilling of location TIDF – Mining – ONGC – 1.96 ha	Tripura State	Disposed on 5-2-2019
30	FP/TR/MIN/13524/2015 – Drilling of location TIDA – Mining – ONGC – 1.76 ha	Tripura State	Disposed on 5-2-2019
31	FP/TR/MIN/13528/2015 – Drilling of location TIAG– Mining – ONGC – 1.42 ha	Tripura State	Disposed on 5-2-2019
32	FP/TR/MIN/13529/2015 – Drilling of location TIAC– Mining – ONGC – 1.368 ha	Tripura State	Disposed on 5-2-2019

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Further, prior to the Hon'ble Supreme Court's judgement dated 03.06.2022 in T.N. Godavarman Thirumulpad Vs Union of India & Ors. (2022) SCC OnLine SC 716, wildlife clearance has been recommended for 680 projects located in wildlife-rich areas, as informed by the MoEFCC to the Rajya Sabha (RS) in September 2020.

It is vital to bring to your kind attention that Karnataka is the only State in our nation which houses reserves of gold. India is the world's second-biggest gold consumer. In May 2022 alone, India imported 101 tonnes of gold, compared to 13 tonnes in 2021. This was an astounding 677% jump from a year ago, to the highest level in a year. It is pertinent to emphasize that high imports lead to increase in the country's trade deficit and put additional pressure on the Rupee. Further, according to official data, gold imports have a significant bearing on the country's current account deficit (CAD), which rose from USD 34.62 billion in 2020-21 to USD 46.14 billion during the 2021-22 fiscal, i.e. by 33.34%, on account of higher demand of gold. In volume terms, India imported 430 tonnes of gold in 2020 and then went on to import 1,050 tonnes of gold in 2021 – the most in a decade. Thus, it would be in the greater interest of our nation that the forest clearance be provided for the subject mine, as the mine is expected to produce an output of 300 - 500 kg of gold per mine which would help to reduce India's import dependency and overall condition of the Rupee, therefore contributing to the overall upliftment of the country's economy.

Further, it will provide considerable impetus to the growth of the local economy and generate more employment in the industrially backward district of Gadag.

In view of the overall larger public interest as explained above, we humbly request your good self to consider our forest clearance proposal and be pleased to grant the same.

With Kind Regards,



Dr. HY Desai
Vice President – Corporate Communications



Query raised by DCF, CCF & PCCF	RMML Reply
<p>Query: 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.</p> <p>Reply: The total forest area under 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 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.</p>	<p>Requested ML area is 39.90 Ha. RMML's proposed area is less than 0.50 % against the wildlife sanctuary and ESZ considered area (48.85 + 297.33 = 346.18 km² or 34600.18 hectares).</p> <p>There is no prohibition of mining in ESZ and wildlife sanctuaries subject to the approval of National Board of Wildlife. Government of India has cleared more than 680 projects in wildlife sanctuaries, protected areas and eco sensitive zones in the past 7 years as per the guidelines No. F. No. 6-10/2011 WL dated 19th December 2012. Gir Lion Sanctuary, Gujarat; Gumti Wildlife Sanctuary, Tripura; Trishna Wildlife Sanctuary, Tripura; Gangaikondam Spotted Deed Sanctuary, Tamilnadu, Udhuwa Lake Bird Sanctuary, Jharkhand; Todgarh Raoli Wildlife Sanctuary, Rajasthan etc, are just a few examples.</p> <p>There are no encroachments and unauthorized agriculture and forest dwellers within the FC applied area. Hence, remarks made by the DCF, Gadag on encroachments and FRA is not applicable to this proposal. The area sought for forest diversion is bare miniscule, doesn't fall within the core of sanctuary. The proposed FC area falls in the fringes of Kappatagudda Wildlife Sanctuary (pl refer enclosed Map). Therefore, restricting or obstructing the wildlife movement doesn't arise. Flora and Fauna in the FC applied are is very meagre.</p> <p>RMML will also join hands with the forest department in developing similar works as a Corporate Social Responsibility. Open mining pit acts as a surface water body serving the requirement of Flora and Fauna of that region. This shall be a natural gully check and ground water recharge point.</p> <p>The matter described on MNREGA, SMC works etc are out of RMML's scope purview.</p> <p>We herewith enclose few pictorial evidences in response to the DCF, Gadag' comments on 'penny-wise pound-foolish situation' on mining environment status across the Country. An ant and elephant has equal role, rights and responsibility in the ecosystem. Ignoring an ant looking at</p>
<p>Query: Mining Pit acts as gully point and helps in enriching the ground water.</p> <p>Reply: 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 Kappatagudda 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 Kappatagudda is the biggest catchment area for Gadag district which already receives less than 700 mm of annual rainfall and is drone-prone district.</p>	

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<p>The efforts of the Forest Department is 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.</p>	<p>elephant is not a wise comparison. Similarly, the gold mining contribution should not be neglected / treated as 'penny-wise pond-foolish. Government need to evaluate the advantages of gold mining from the point of national economy perspectives.</p>
<p>Query: 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.</p> <p>Reply: 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 location.</p> <p>Indian wolf present in large numbers at Kppathgudda 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.</p> <p>Apart from the wolves, striped hyena, foxes, jackals, leopards are some of the other carnivores present in Kappatagudda. Two species of the antelope viz. Black buck and four-horned antelope (Chousingha), barking deer, spotted deer, pangolins, pangolins etc are seen in large numbers which have been confirmed by camera trap images.</p> <p>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.</p>	<p>The species mentioned by the DCF, Gadag are common species found across the State / Country in any forest region. There are no unique species in Kappatagudda which are not seen other parts of Karnataka. Nationwide number of mining leases are spread in various forest covers of different States. Kappatagudda is also one among them. Mining activity will never hinder the wildlife. Gir Lion Sanctuary, Gujarat; Gumti Wildlife Sanctuary, Tripura; Trishna Wildlife Sanctuary, Tripura; Gangaikondam Spotted Deed Sanctuary, Tamilnadu, Udhuwa Lake Bird Sanctuary, Jharkhand; Todgarh Raoli Wildlife Sanctuary, Rajasthan etc, are just a few examples.</p>

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<p>Query: 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.</p> <p>Reply: 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 Huttli 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 Kappathugudda along with surrounding kadkol village.</p> <p>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.</p>	<p>MMDR Act and MCDR emphasis on Progressive Mining Planning, Mine Closure plan and Rehabilitation and Resettlement plan. The land reclamation is a continuous process in mining activity. Some of the reclaimed area photographs are appended for your ready reference. R & R in mining region is a quicker regeneration which has not been achieved by natural process till these years.</p> <p>Gold is a very strategic metal, there is a huge demand for gold in India. Consequently, huge quantity of gold is imported and it is a drain on the Foreign Exchange of country. Hence, gold mining is the need of hour and strategic requirement as a part of economy development. It will give lot of impetus to the local economy and employment in industrial backward district of Gadag. Further, Gold mining involves underground mining with minimum breaking of land, trees to be cut are negligible, equivalent land will be provided along with 5 times of NPV and compensatory afforestation charges for development of forest at alternative land. Mining is based on sustainable development principle.</p>
<p>Query: If one has to maintain a fair balance between the forest / wildlife on one hand and the economic benefits of the 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.</p> <p>Reply: Only 6% of total geographical areas 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.</p> <p>Kappathugudda 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</p>	<p>The area applied for FC 39.90 hectare shall be in micro scale compared with 6% of forest cover of Gadag district. RMML reiterate that, there is no unauthorised agriculture practice in 39.90 hectares. The comments made by the DCF, Gadag on encroachments and FRA matters are out of RMML's scope purview. Sustainable Mining and Environment Management should go hand in hand.</p> <p>More than 1000 mining category projects working across the Country will stand still with misinterpretation of above order.</p> <p>By and large, we request your good office and entire forest department to look from the all-round prosperity of nation rather than narrow thinking on mining project.</p>

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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 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.

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