

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

\*\*\*\*\*

**Indira Paryavaran Bhawan,**  
 Jor Bag Road, Aliganj,  
 New Delhi – 110003  
**Dated: April, 2023**

To,

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

**Subject: Diversion of 80.59 ha forest land (15.549 ha Revenue forest land of Shahdol Range under South Shahdol Forest Division and 46.488 ha in RF-227 & PF-779 of Ghanghunti Range and 18.553 ha Revenue Forest Land under Umaria Forest Division) for Sahapur West Underground Coal Mine Project & surface use in favour of M/s Sarda Energy & Minerals Ltd. in Shahdol & Umaria Districts of Madhya Pradesh State (Online No. FP/MP/MIN/151378/2022) – regarding.**

Madam/Sir,

I am directed to refer to the PCCF (LM) and Nodal Officer, FCA, 1980, Government of Madhya Pradesh letter no. F-1/839/2023/10-11/1182 dated 20.03.2023 forwarding a fresh proposal on the above subject seeking prior approval of the Central Government under Section-2 of the Forest (Conservation) Act, 1980. After examining the proposal, the following shortcomings have been observed:

- i. As per the component wise breakup submitted in the proposal an area of 5.531 ha forest land has been proposed to utilized for setting up of Infrastructure which is a non-site specific activity. Therefore, the State Govt. shall explore the possibility of shifting the infrastructure activity on the nearby Non-forest land.
- ii. The Mining plan was prepared in the year 2012. Therefore, the State Govt. shall examine and justify the relevance of same after a period of 10 years and a duly approved Mining plan along with Progressive mine reclamation/ closure plan shall be submitted accordingly.
- iii. The total Mining lease area has been reported as 619 ha in online Part-I whereas the same is mentioned in the mining plan as 587.50 ha. Therefore, this discrepancy in the mine lease area needs to be addressed.
- iv. Nallah/River tributary is flowing through the mining lease area. In this regard the detail of the proposed mitigation measures and impact of the project on the hydrological regime in the area shall be submitted.
- v. The KML files indicating the different components of the projects shall be submitted conspicuously depicting the various projects components vis-à-vis including the components proposed to be undertaken on the Non-forest land.
- vi. Details of coal evacuation plan and involvement of forest land, if any, shall be intimated.
- vii. As per online details, the instant project is located in the Scheduled Area. Therefore, clarification/comments in this regard shall be submitted.
- viii. User agency has given 82.677 ha Non-forest land (NFL) for CA against surface utilization of 7.136 ha forest land which is substantially more than the actual requirement. Therefore, a clarification in this regard needs submission. Moreover, the ownership and details of the revenue records regarding NFL should also be provided.
- ix. The actual number of trees marked to be felled for surface utilization of 7.136 ha forest land has not been submitted, which shall be provided.

- x. As per the proof of ownership submitted by the State Govt., the Non-forest land proposed for Compensatory Afforestation is not free from all encumbrances and the some areas are mortgaged to banks. Therefore, the State Govt. shall ensure that the land proposed for CA is free from all encumbrances.
- xi. The Site suitability certificates from the DCF concerned, certifying the suitability of non-forest land for raising CA, shall be submitted and uploaded online along with complete CA scheme.
- xii. The CCF, Shahdol in his Site Inspection report has mentioned the presence of Leopard along with reptile's and other schedule animals in the forest land proposed for diversion. Therefore, the comment of Chief Wildlife Warden in this regard needs submission.
- xiii. As per DSS analysis, the proposed forest land for diversion is located at a distance of 2.98 Km from the Achanakmar-Bhandhavgarh Tiger Corridor. Therefore, the comment of Chief Wildlife Warden in this regard needs submission.
- xiv. As per DSS analysis (**copy enclosed**), a protected forest (PF) patch i.e. Compt No. 780, Block: Kathoutiya, Shahdol Range located on the south-eastern corner of the Mining lease has not been included in the instant diversion proposal. This needs clarification.
- xv. Satellite imagery shows the presence of Road, settlements, Nallah, etc. within the proposed forest land for diversion. The same needs clarification.
- xvi. Satellite imagery shows that plantation work has been carried out in the PF-779 proposed for diversion. The State Govt shall ensure that the area has not been used for raising Compensatory Afforestation in the past. The details of the plantation shall also be provided.
- xvii. Satellite imagery shows that a metalled/pucca Road has been constructed recently during the year 2019 in RF-227 which is proposed for diversion. The copies of approval under the FCA, 1980 for the same needs submission.
- xviii. The DGPS Map of proposed CA land shall be uploaded on online portal.
- xix. The rates of NPV mentioned in the CB analysis pertain to the Open Forest Category whereas the crown density of the proposed area has been reported as 0.4 in the proposal. The Cost Benefit analysis has to be submitted on the prescribed format keeping in view the revised rates of NPV and the density/Eco Class of the proposed area.

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

Yours sincerely,

**Encl: As Above**

**Signed by Suneet Bhardwaj**

**Date: 17-04-2023 12:07:42**

Sd/-

(Suneet Bhardwaj)

**Assistant Inspector General of Forests**

**Copy to:**

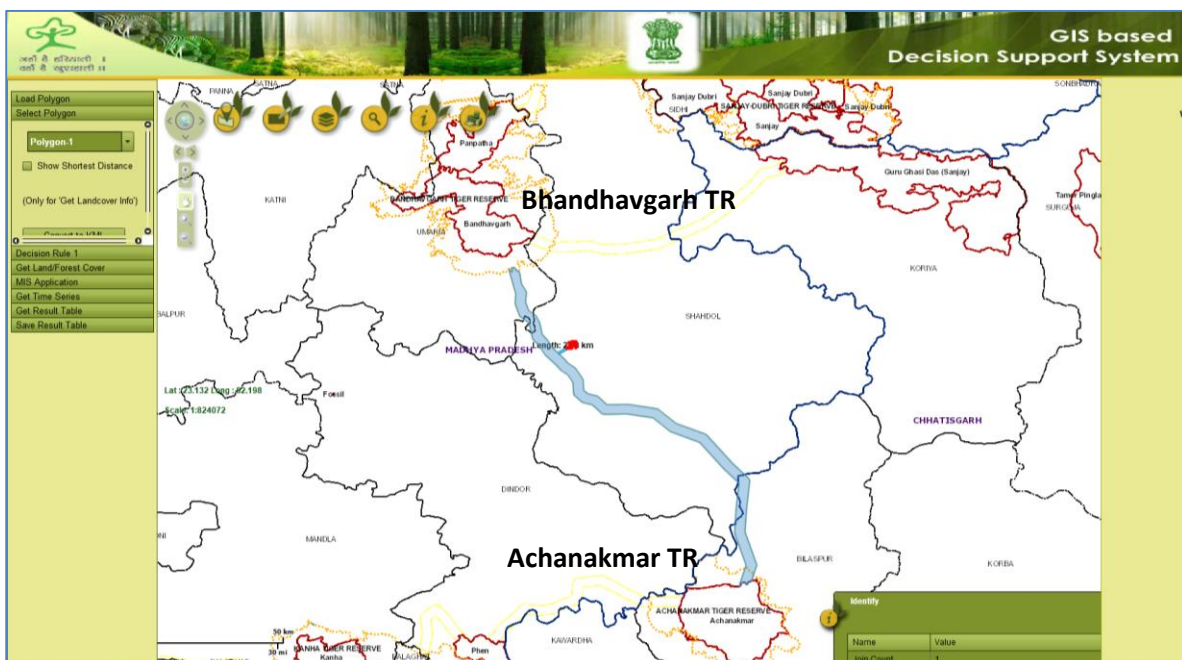
1. The PCCF (HoFF), Department of Forest, Government of Madhya Pradesh, Bhopal;
2. The Regional Officer, Integrated Regional Office, MoEF&CC, Bhopal;
3. The Nodal Officer (FCA), Department of Forest Government of Madhya Pradesh, Bhopal;
4. User Agency;
5. Monitoring Cell, FC Division, MoEF & CC, New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

**Proposal:** Proposal for diversion of 80.59 ha forest land (15.549 ha Revenue forest land of Shahdol Range under South Shahdol Forest Division and 46.488 ha in RF-227 & PF-779 of Ghanghunti Range and 18.553 ha Revenue Forest Land under Umaria Forest Division) in favour of M/s Sarda Energy & Minerals Ltd. for Sahapur West Underground & Open Cast Coal Mine Project in Shahdol & Umaria Districts of Madhya Pradesh State (Online No. FP/MP/MIN/151378/2022)

**Summary of DSS Analysis Report:**

**I. In Case of Land proposed for Diversion:**

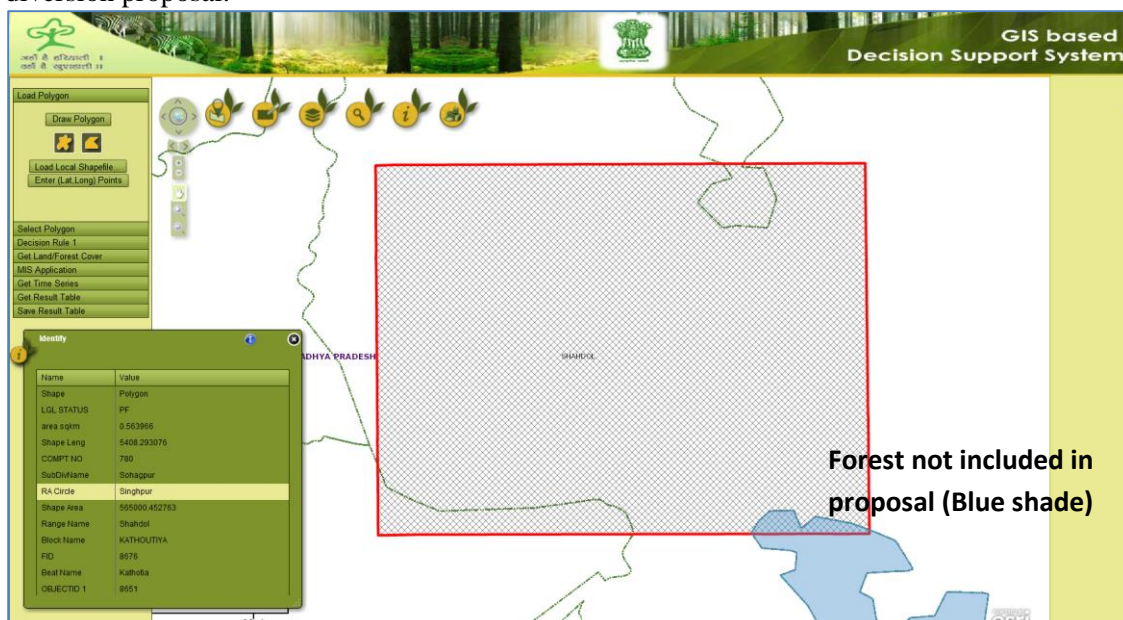
1. Proposed forest area for diversion falls under Shahdol district of Madhya Pradesh State.
2. Calculated area of Shape file/ KML file of Forest land proposed for diversion is found 80.900 Ha (software calculated) instead of 80.59 ha as per PARIVESH.
3. As per DSS, the proposed forest land for diversion is located at a distance of 2.98 Km from the Achanakmar-Bhandhavgarh Tiger Corridor. Moreover, buffer of Bhandhavgarh Tiger Reserve is located at a distance of 26.36 Km from the proposed forest land.



4. The instant proposal falls under Not-Inviolate or Not-In high conservation zone (NHCV) category as per the DSS Rule-1 & 2.
5. **Forest Cover in the instant project:** Out of total 82 Ha (DSS calculated) forest area of instant project, 5 ha of land is characterized with Moderately Dense Forest, 31 ha of land as Open forest and 46 ha is Non-forest/Non-wooded (land devoid of tree cover) in terms of forest classes (as per the ISFR 2019) based on the interpretation of satellite data period 2017-2018.



6. **Forest Types details:** 5B/C1 c Dry Peninsular Sal Forest: 0.00 ha, 5B/C2 Northern Dry Mixed Deciduous Forest: 24 ha and Non-Forest: 57 ha
7. As per the DSS, a protected forest (PF) patch i.e. Compt No. 780, Block: Kathoutiya, Shahdol Range located on the south-eastern corner of the Mining lease has not been included in the instant diversion proposal.



8. The user agency has uploaded the Mining lease boundary and its total area is found 619 ha. However, as per the Mining plan, Block area has been mentioned as 587.50 ha.
9. The State Govt. may be requested to upload a map showing the purpose wise utilization of forest land proposed for diversion on PARIVESH.
10. Satellite imagery shows the presence of Road, settlements, Nallah, etc. within the proposed forest land for diversion.
11. Satellite imagery shows the presence of plantations work in the PF-779 proposed for diversion.

12. Satellite imagery shows that a metalled/pucca Road has been constructed recently during the year 2019 in RF-227 which is proposed for diversion.

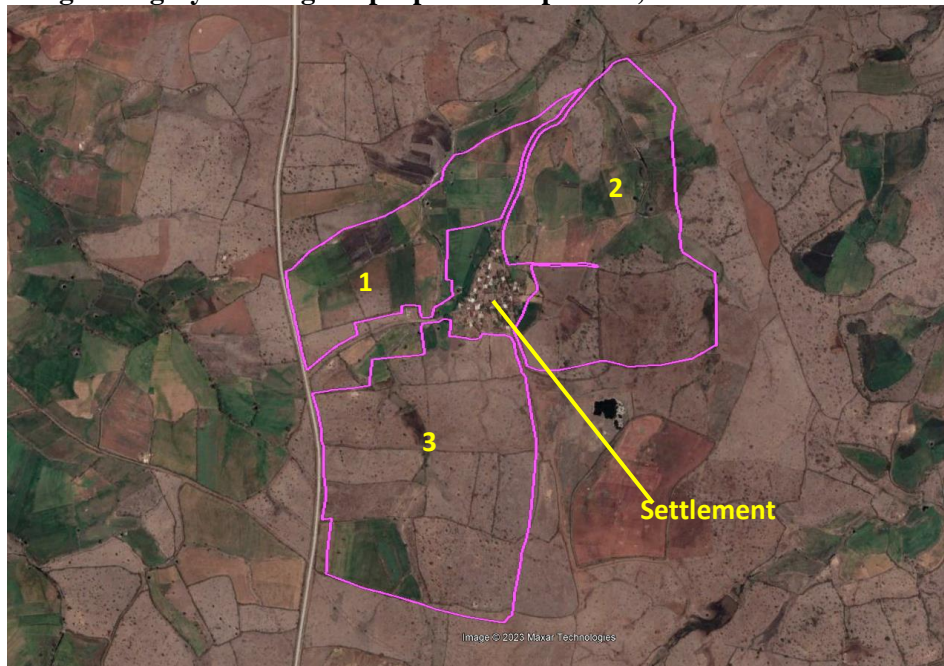
## II. In Case of Compensatory Afforestation Land:

1. Compensatory afforestation has been proposed over Non-forest land in 3 (three) patches comprising an area of 82 Ha (DSS Calculated).
2. In terms of standards followed in ISFR 2019 (interpretation of satellite data period 2017-2018) regarding density classes is given below:

S.No.	Name	District	Village Name	Khasra No.	GIS Area (Ha)	DSS Area (Ha)	State Govt Area (Ha)	Open Forest	Scrub	Non-Wooded
1	Patch1	Sagar	Chakk Bilaiki	39, 40/1, 40/2,	16.118	16	82.677	0	4	12
2	Patch2			41, 42, 43/1,	31.666	31		1	7	23
				43/2, 44/1, 44/2, 44/3, 44/4, 44/5, 45/1, 45/2, 45/3, 45/4, 45/5, 45/6, 46, 48, 49/1, 49/3, 50, 51, 52, 53, 56/1, 56/2, 57/1, 57/2, 57/3, 57/4, 57/5, 57/6, 58/1, 58/2, 58	34.882	35		0	15	20
<b>Total</b>					<b>82.666</b>	<b>82</b>	<b>82.677</b>	<b>1</b>	<b>26</b>	<b>55</b>

3. **Forest Cover in CA land:** Out of total 82 ha (DSS Calculated) Non-forest land proposed for CA, 1 ha of land is characterized with Open Forest, 26 ha is Scrub and 55 ha. of land as Non Forest/ Non-wooded in terms of forest classes (as per the ISFR 2019) based on the interpretation of satellite data period 2017-2018.
4. The State Govt. may be requested to upload the DGPS Map of proposed CA land on PARIVESH.
5. As the CA in the instant proposal has been given on Non-forest/ Revenue land, entire CA area is found under Agriculture usage and same is depicted through the satellite imagery.

### Google imagery showing the proposed CA patches;



## Decision Support System (DSS):

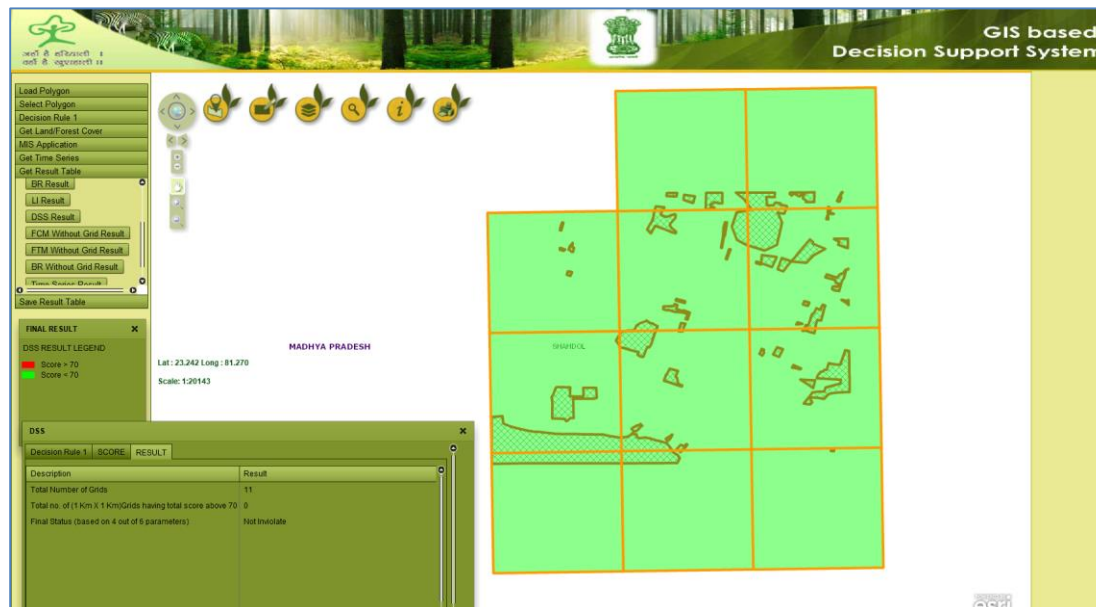
### Decision Rule no. 1:

Whether forms part of:

- I. Hydrological Layer:
  - a. Major River: **N/A**
  - b. Wetland (Area more than 10 ha.): N/A
  - c. Water bodies (irrigation/Hydropower/water storage): N/A
- II. Very Dense Forest patch (>1 sq km): N/A
- III. Remnant Forest Type: N/A
- IV. Protected area/Tiger Reserves/Tiger corridors: N/A
- V. Wild life Species: **Sloth Bear & Dhole**

### Decision Rule no.2: Without 50% Rule:

GRIDID	SCOREFCM	SCOREFTM	SCOREBR	SCORELANDSCAPE	AGGREGATESCORE
1759976	16.45	20.19	78.04	27.08	35.44
1762129	7.2	3.37	67.02	25.55	25.79
1762127	0.27	0	0.3	29.22	7.45
1759975	10.45	2.16	9.38	31.89	13.47
1762128	3.43	0	3.75	26.97	8.54
1764278	6.44	10.83	25.89	28.84	18
1766426	42.41	53.57	64.43	30.89	47.83
1766428	8.1	0.63	33.41	22.98	16.28
1766427	12.91	16.79	28.02	26.59	21.08
1764279	0.52	0.49	1.48	27.15	7.41
1764280	0	0	6.72	24.96	7.92



DESCRIPTION	RESULT
Total Number of Grids	11
Total no. of (1 Km X 1 Km)Grids having total score above 70	0
Final Status (based on 4 out of 6 parameters)	Not-Inviolate

**Final Result: Not-Inviolate (Based on Decision Rule 1 & 2)**

### **Forest Cover Map:**

In terms of standards followed in ISFR 2019 (interpretation of satellite data period 2017-2018) regarding density classes:

- I. Very Dense Forest (Canopy density 70% & above): 0.00 ha.
- II. Moderately dense Forest (canopy density 40-70%): 5 ha.
- III. Open Forest (canopy density 10-40%): 31 ha.
- IV. Non-forest: 46 Ha



**Forest Type Map:** 5B/C1 c Dry Peninsular Sal Forest: 0.00 ha, 5B/C2 Northern Dry Mixed Deciduous Forest: 24 ha and Non-Forest: 57 ha



**Biological Richness:** High: 1 ha, Medium: 42 ha, Low: 1 ha and Non-forest: 36 ha



Submitted please.

**Prashant Tiwari**  
Sr. Technical Associate, DSS Cell (FC)  
06.04.2023