

**SCRUTINY COMMENTS ON EXAMINATION OF FINAL MINE CLOSURE PLAN OF KARAMPADA IRON ORE MINES OF M/S SHAH BROTHERS, OVER AN EXTENT OF 69.721 HECTARES, LOCATED IN GANDBURU – KARAMPADA RESERVED FOREST LOCATED IN SINGHBHUM WEST DISTRICT, JHARKHAND STATE, SUBMITTED UNDER RULE 21(1) OF MCR, 2016.**

(1) In the front cover of the FMCP, it is found that, the document has been submitted under Rule 21(1) of MCR, 2016, which is not correct, instead the exact Rule & sub-rule of the MCDR, 2017 should be quoted and necessary corrections/incorporations may be made not only in the front cover but also in other relevant places of the document for more informative.

(2) (i) In the consent letter from the applicant, Shri Raj Kumar Shah, M/s Shah Brothers has been consented to Dr. Gurupinder Singh Jaiswal, Qualified person for preparation of Final Mine Closure Plan but the ID proof in support of Dr. G.S. Jaiswal has not been submitted. (ii) The applicant has given consent to prepare the FMCP, over an extent of 69.721ha out of the retained area of 190.221ha, whereas the original lease was executed for 233.99ha and an extent of 43.769ha is stated to have already surrendered but accepted surrendered status by the competent authority of the State Govt. of Jharkhand has not been enclosed, which should be submitted. (iii) When the ID & address proof of two partners i.e. Shri Shyamsunder Shah & Shri Raj Kumar Shah has been enclosed as annexure to the document, why Shri RaJ Kumar Shah has been signed the consent letter/certificate /declaration /undertaking alone should be clarified.

(3) The correctness of the extent of retained lease area furnished in the certificate & declaration from the applicant should be checked considering the actual facts & figures.

(4) The correctness of the extent of retained lease area furnished in the certificate of the qualified person should be checked considering the actual facts & figures.

(5) The partnership deed enclosed as annexure-II has not been registered with the competent authority of the State Govt., thereby a registered copy of the partnership deed should be enclosed by replacing the enclosed one for clarity. Moreover, few pages of the partnership deed enclosed along with the FMCP also not clearly legible.

(6) As per the partnership deed enclosed as annexure-II, Smt. Savitri Devi Shah, Shri Shyamsunder Shah, Shri Rajkumar Shah & Shri Girish Kumar Shah are the partners of M/s Shah Brothers but only the photo ID proof in favour of Shri Shyamsunder Shah and Rajkumar Shah has been enclosed as annexure-III but the same in favour of Smt. Savitri Devi Shah & Shri Girish Kumar Shah is missing, which should be submitted. Moreover, in the lease deed enclosed as annexure-IV, Shri Dwaraka Das Shah, F/o of Shri Shyamsunder Shah & Shri Rajkumar Shah is the partner of M/s Shah Brothers but it is not known how Smt. Savitri Devi Shah and Shri Girish Kumar Shah have become the partners of the aforesaid company should be furnished supported by proper evidence.

(7) The copy of forest clearance for broken of area of 24.856ha has been enclosed as annexure-VI but the map/plan of such broken up area is missing in the above refer annexure, which should be enclosed for more informative.

(8) No photographs showing the status of applied surrendered area of 69.721ha including the existing quarries & dump has been enclosed along with the document, which should be submitted.

(9) The status of exploration carried out in the applied surrendered area has not been submitted, which should be furnished.

(10) Chemical analysis report in support of the grade of the iron ore available in the lease area as well as in applied surrendered portion of the area has not been submitted, which should be obtained either from NABL accredited laboratory or from a Govt. Laboratory & enclosed along with the document.

(11) The ambient air quality, water quality, noise level & vibration level analysis report of the mine should be submitted.

(12) In case of individual or partner, a declaration/affidavit should be submitted to know whether he is working in other firms/company/organization etc.

(13) All the plan & sections submitted along with the final mining closure plan should be certified by the qualified person indicating that, **the plans and sections are prepared based on the lease map authenticated by the State Govt. of Jharkhand.**

(14) The name of Shri Raj Kumar Shah has been mentioned as Managing Partner but no such paper in support of the same has been enclosed. (Para 1.0)

(15) Repeatedly it is mentioned that, an extent of 43.769ha has already been surrendered at the mine of forest clearance but the acceptance status of such surrendered by the State Govt. of Jharkhand has not been enclosed, which should be submitted. If the area is really accepted by the State Govt., then the authenticated map for the accepted surrendered area should also be enclosed. According, the said portion of the area may also be marked on the surface plan and all other relevant plans submitted along with the FMCP for ease in monitoring. (1<sup>st</sup> para of page No.2)

(16) Under the heading **Present Land use pattern**, it is mentioned that, a number of quarries were opened in the area but name/number/dimension and working/non-working status of such quarries are missing, which should be furnished. Besides, size/capacity and location co-ordinates of all the existing dumps is required to be furnished. All should be presented in tabular form. (Page No. 3)

(17) In 3<sup>rd</sup> column of Table-3, a very sentence has been made **Area Already Surrendered**, which is not correct as the surrender has not been accepted by the State Govt. of Jharkhand so far, instead it can be mentioned that, the area has been applied for surrender. Accordingly, such things mentioned else were in the FMCP should be corrected.

(18) In 1<sup>st</sup> para in the page under reference, it is mentioned that, an extent of 1.986ha has been proposed to be reclaimed & rehabilitated by plantation but no specific information/ proposal for such reclamation & rehabilitation has been given. Besides, name/number/size/capacity of the dump(s) proposed to be rehabilitated and the manner of rehabilitation as well as location co-ordinates of such dumps may also be given. The number of saplings proposed to be planted as the rehabilitation measures of the worked out quarry(s)/pit(s) as well as the dump(s) may also be furnished. All should be presented in tabular form. (Page No. 6)

(19) Under the heading **method of mining**, the mining activities in the past restricted to block-7 by manual means has been given, instead the method of mining practised in the mine at present should be furnished in detail for more informative. (Page No. 6)

(20) Repeatedly, a mention has been made about the retained area of 190.221ha, which is not correct. On examination of the FMCP, it is found that, no surrendered has been accepted by the State Govt. of Jharkhand so far and the mining plan/scheme of mining/modified mining plans are continuously

approved by IBM for the entire leased out area of 233.99ha and no certificate under Rule 29A (2) of MCR, 1960 has been issued by IBM so far. Therefore, as on date, the entire extent of lease area is under the possession with the lessee. Therefore, necessary corrections/modifications may be made in other relevant places in the document. (Para 1.1)

(21) The conditions imposed in the lease deed & compliance thereof should be furnished and the para may be revised accordingly. [Para 1.2(a)]

(22) The compliance status of conditions given in item (vii) & (viii) of the approval letter No. KOL /SB(W) /Fe/MP-555,Vol.III, dated 08.12.2015 is required to be submitted as the same has not been enclosed along with the document.

(23) The mineral resources have been estimated without any basic data, which is not acceptable. Besides, certain cross sections, sectional area, length of influence & volume have been computed without any proper plate reference and it is not possible what for such information/data has been furnished without any basis. Therefore, the available exploration data of the area should be utilised for such resources estimation and the entire thing should be revised accordingly. [Para 2.2(A)]

(24) The existing mineral beneficiation facility available in the mine should be furnished and the para may be revised accordingly. (Para 2.4)

(25) The dimension of quarries & size/capacity of the existing dumps has not been furnished in 3<sup>rd</sup> column of the table given in the para under reference, which should be furnished. Accordingly, the same may also be furnished at other relevant places of the document. (Para 4.1)

(26) The location co-ordinates of proposed planation is missing, which should be furnished with proper plate reference. (Table-8)

(27) Plate-2B (Key Plan): An index reference for applied & approved surrendered area has been given but the surrender of 43.769ha has not been approved by the competent authority of State Govt. of Jharkhand, thereby the same should be mentioned as **applied surrender area**. Accordingly, corresponding changes may also be made in all other plates.

(28) Plate-3 (Lease Plan): In the contents for the plate, it is mentioned that, the lease plan has been prepared based on the topographical map enclosed as Plate-2A, which is not correct, instead an authenticated lease map from the State Govt. of Jharkhand should be obtained and enclose along with the document.

(29) Plate No. 3 (Surface Plan): (i) The index reference given for ML boundary is not matching with that of the plan portion of the plate. (ii) The boundary pillars are considered as Ground Control Points (GCP), which is not proper, instead at least three permanent ground control points outside the lease area should be selected and latitude & longitude of those points may also be furnished. Besides, these ground control points need to be linked with the boundary pillars. Accordingly, the location of GCP depicted in the other plates may also be revised.

(30) Plate-7 (Final Mine Closure Plan): Index reference for the plantation proposed as the rehabilitation measure in the applied surrender area of 69.721ha is missing, which should be furnished and the plate may be revised accordingly.

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