

**SCRUTINY COMMENTS ON FMCP DOCUMENT IN RESPECT OF NANDAVARAM-VENKATAPURAM
LIMESTONE MINE OF SHRI JAJAYOTHI CEMENT PVT. LTD. OVER AN AREA OF 24.739 HA IN
KURNOOL DISTRICT OF ANDHRA PRADESH STATE SUBMITTED UNDER RULE 24 OF MCDR, 2017.**

1. **General:** All the information for cover page mentioned in the guideline of " IBM Manual for appraisal of Final Mine Closure plan, June-2022" (hereinafter referred as format) to be mentioned like Mine code, category of mine, period of proposals, qualification of QP etc. Hence, necessary information to be provided on cover page as specified in format.
2. In the introduction it is mentioned that it is proposed to close the mine by 30.08.2024, but it is not fully substantiated with detailed time scheduling bar chart in Final Mine Closure Chapter.
3. Under para 1.2.7 the supporting documents regarding the area surface right obtained should be enclosed as annexure.
4. Under para 1.4 the review of approved mining plan the proposals and the actual work done should be rechecked with the approved mining plan and statutory reruns along with proper justification for deviations.
5. In the document wherever the FMCP proposal has been submitted the proposal year should be furnished.
6. The copy of the qualification & experience certificate in respect of the QP to be enclosed as per Rule 15 of MCR, 2016.
7. **Geology and Exploration:** under para 2.2.1 the pits information should be furnished in the tabular format. Under para 2.2.2 only the information regarding boreholes should be furnished. For the information furnished under para 2.2.3 the supporting document should be enclosed as annexure.
8. The details furnished under para 2.2.6 regarding the blocked resources should be as per the last approved mining plan. Under para 2.3 the updated reserves/resources should be in line with the last approved mining plan document and also the depleted reserves during the period. Check and rectify the same.
9. Para 2.4.: Proposal should be given to submit a final Geological report.
10. **Mining:** The details should be in concurrence with the latest approved Mining Plan/RMP/MMP or approved Modified mining Plan. In this particular instant the last approved document validity period is 31.03.2023 and lessee has submitted draft review of mining plan for the period which is beyond 31.03.2023, so accordingly necessary changes should be made wherever required in the document as per the latest approved mining plan also.
11. **Final Mine Closure Plan:** Under para 5.1.1 proposal should be given for backfilling if the mined out land is devoid of mineralization & suitable proposals like water reservoir etc., along with protective measures should be furnished. Year wise proposal should be furnished for the mined out land.
12. Under para 5.1.2 year-wise proposals should be given for Securing the Excavations/ pits/ Mineralized Dumps or Mineral Rejects stacks/ Fines stack, waste dumps etc.
13. In para 5.1.3, In pursuant to the order dated 14.01.2020 passed by MoM, GoI, consequent up on the order dated 08.01.2020 of the Hon'ble Apex Court passed in W.P.(C) No. 114/2014, the lessee shall carryout "regrassing in mining area after closure of mines". So accordingly regrassing proposal should be given in the mining area. Also afforestation as gap planation over dumps for stabilization and safety zone, virgin area should be proposed. Year-wise proposals should be given.
14. Under para 5.1.5 the details should be elaborated with quantities of water management, maximum depth of workings, water table details, surface run off management etc.,
15. Under para 5.1.4 the proposals should be given for utilizing the entire top soil available at mine lease area.
16. Under para 5.1.6 the details should be elaborated with elaborated with air monitoring stations, details regarding the periodical monitoring with parameters to be monitored.

17. Under para 5.1.7 the waste management keeping in view of the entire waste lying in the lease area should be discussed with suitable measures.
18. In para 5.1.10 Baseline information of the lease area should be described on the basis of information incorporated in first approved mining plan at the time of grant of ML. Baseline information to be furnished separately for Noise, Air, flora and fauna and climatic condition. Existing base line information to be furnished on the basis of environment monitoring parameter carried out. The environment monitoring data of last one year to be enclosed for ready reference. Further, base line information to be furnished for Mining Lease area and surrounding 500 meter form lease boundary.
19. Para-5.1.11: The details of all existing infrastructure available in the lease area should be furnished in tabular form and their present value and value at the end of lease period. after depreciation. Further their future utilisation should be evaluated. The decommissioning cost and final value of the decommissioned infrastructural facilities if any may be furnished. Further, it is to indicate to retain the area in the auction by lessee.
20. Infrastructure details of essential commodity/related to basic need to be given and in no case, any infrastructural facility which is an essential commodity/related to basic need or which absence may cause any degradation of environment or any damage to flora and fauna in and around the ML area or any danger to public safety or public infrastructure like rail, road etc. shall be decommissioned (dismantling water supply, water treatment plant, power lines etc.) without prior intimation/approval of appropriate authority.
21. Para 5.1.16: The mitigative measures to be taken for prevention of pollution of air to be described. The location of air monitoring station and its monitoring frequency to be described. Similar information for other environment monitoring parameter to be given.
22. Para 5.1.15: Time scheduling for proposed activity like waste dump management (Garland drain, retaining wall, settling tanks, plantation), safety and security (fencing of pits, dumps etc), disposal of machineries, reclamation & re-habilitation, infrastructure, protective measures of environment should be supplemented by PERT (programme evaluation review technique) or Bar chart and these activities should be clearly shown on reclamation plan
23. Para 5.1.16: Backup calculation of abandonment cost mentioned under the para to be enclosed. Abandonment cost as furnished in tabular form has not includes the cost of decommissioning of machinery, cost of material required, safety measures implemented to prevent access to surface openings/excavations/dumps etc. The cost of maintenance, security and supervision has also been not included. Abandonment cost to be estimated based on the activities required for implementing the protective and rehabilitation measures including their maintenance and monitoring programme. Accordingly modify the cost of the abandonment.
24. Uner para 5.1.17 post closure monitoring details should be furnished till the handover of site to state government.
25. Under table 5.2 regarding the protective measures for reclamation and rehabilitation table should be revised after attending the above scrutiny points.
26. The financial assurance table should be rechecked and rectified according to the land degradation in the lease area.
27. **Financial Assurance:** the performance security submitted furnished is valid till 05.06.2023 .so Updated performance security should be submitted as per rule 12 of Mineral (Auction) Rules, 2015.
28. **Plates:** General: All plans and sections should be submitted on 1:1000 scale except environment plan. Accordingly all relevant tables in text and plan to be modified. The date of survey to be mentioned in all the plans and sections.
29. All plans and sections should be signed with date by Qualified persons and other relevant Persons. Magnetic Meridian and date of observation of should be given on all relevant plans.
30. Key Plan: The approach road to lease area has not shown.
31. **Surface plan:** the common boundary shared by present lease area with others if any should be demarcated on the plan. The Surface Plan should be prepared to satisfy the provision as laid down rule 32 (1) (a) of MCDR'2017. Surface plan should be signed by certified surveyor.

32. **Geological Plan & Section:** Litho and ore zone to be marked on the drilled BH and accordingly correlation of different litho unit to be made over the sections and should be match with geo plan. Vertical gridlines i.e. easting should be depicted on sections.
33. **Development plan and section:** Updated development plan sections to be submitted as per latest approved document.
34. **Reclamation plan:** Proposal of afforestation, regrassing. , adequate retaining wall and garland drain to be given along the existing dumps, and area of mineral stack. All the proposed features in FMCP to be depicted year wise in the plan. The color code for existing and proposed feature should be different. Accordingly, reclamation plan to be revised. All the proposed features in tabulated manner may be depicted on the plan.
35. **Environment plan:** The Environment Plan as prepared should be satisfy the provision as laid down rule 32 (5) (b) of MCDR'2017. plan should be signed by certified surveyor.
36. **Financial Assurance plan:** Plan has not submitted along with the document. Area degraded due to mining allied activity has not been considered for estimation of financial assurance like area degraded between various dumps and roads. The different color coding should be used for existing and proposed land use during FMCP. FA table should be as per the format provided in Manual.

Enclosures:

37. Copy of form I and J as per MCDR, 2017 to be enclosed for all the drilled BH for ready and future reference as per Rule 47 and 48 of MCDR, 2017.
 38. Copy all of violation/ show-cause notice and its compliance to be enclosed.
 39. All the annexure to be properly numbered/paged and signed by the OP. Annual return of last three years to be submitted.
 40. NABL Accreditation certificate of laboratory from where Chemical Analysis carried out should be enclosed. Some photographs covering ML Boundary pillars, mining activity, dumps, processing plant, core shed etc. to be enclosed.
 41. Environment monitoring data to be enclosed at least for last one year. Copy of surface right order. Certificate of surveyor. Copy of updated bank guarantee.
 42. Few photographs covering ML Boundary pillars, pits/quarries, mining activity, dumps, processing plant, core shed, coir matting on dumps, retaining wall and garland drain etc. to be enclosed with description and location.
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