

December 13, 2021

To  
Shri Bhupesh Baghel  
Chief Minister  
& Chairman, State Board for Wildlife  
Government of Chhattisgarh

**Subject: Plea to reconsider the Chhattisgarh government's decision to pursue proposals for the opening up and expansion of mining operations in the Hasdeo Aranya forest**

Respected Shri Baghel,

We, the undersigned, write to you as concerned citizens regarding the recent decision taken by your government to pursue proposals for the opening up and expansion of mining operations in the ecologically important Hasdeo Aranya forest in northern Chhattisgarh. This includes new proposals for the Parsa, Kente Extension and Madanpur South coal blocks and the expansion of mining in the Parsa East & Kente Basan (PEKB) block. This is despite the state government's assurance recorded in the 2012 forest clearance for the PEKB coal mine, wherein it has been stated that "the State Government will not come up for opening up of the main Hasdeo-Arand area." We believe this to be an ill-considered decision, one that will have devastating long-term consequences for the natural heritage of Chhattisgarh and the lives and livelihoods of millions. It is, furthermore, a decision that lacks both scientific legitimacy and popular mandate, since it neither accurately represents the will of the indigenous communities that reside in the Hasdeo Aranya forest, nor follows the recommendations of the expert study that was conducted to evaluate the environmental and biodiversity conservation impacts of mining in the region.

You would be aware, sir, that the above mentioned expert study was necessitated by the National Green Tribunal's order dated March 24, 2014, which held that the Forest Clearance for the PEKB block, granted by the Union Ministry of Environment, Forest, & Climate Change (MoEFCC), be set aside pending the completion of an environmental and biodiversity assessment report on one of the largest contiguous forest landscapes in the country, which overlaps with the Hasdeo Arand Coal Fields (HACF). Further, in a letter dated 19 December 2017, the MoEFCC, while granting Stage 1 Clearance for the prospecting of 1745.883 hectares of forest land in the Kente Extension coal block, also imposed the condition that the Government of Chhattisgarh would conduct a biodiversity assessment of the HACF. In January 2018, the Principal Chief Conservator of Forests, Chhattisgarh Forest Department, sought a joint proposal (vide letter reference 331-228 dated 02-01-2018) to conduct such an assessment from the Indian Council of Forestry Research (ICFRE) and the Wildlife Institute of India (WII), following which this expert study was commissioned. While ICFRE was to be the Nodal Agency, the biodiversity assessment was conducted jointly by WII and ICFRE, with the former studying aspects related to mammals, avifauna and herpetofauna, and the latter focusing on floral diversity.

The WII report, titled "Biodiversity assessment with emphasis on select faunal groups in the Hasdeo Arand Coal Field, Chhattisgarh" (Tr No/2021/08), was submitted to your government along with the

ICFRE report in October 2021 (the 'Executive Summary' of the ICFRE report mentions that the WII report is enclosed in its submission as Volume-II). We note with dismay that in your subsequent recommendation to the MoEFCC that further areas of HACF be opened up for mining, your government has chosen to ignore the findings and recommendations of the extensive assessment conducted by WII, India's foremost wildlife research organisation. We would, therefore, like to bring the following salient issues to your notice:

**BIODIVERSITY:** The Hasdeo Aranya forest in which the HACF lies is one of the largest contiguous stretches of dense forest in Central India, spanning 170,000 hectares. **The forest is also the catchment of the Hasdeo River, the Mahanadi's largest tributary, and is therefore critical for perennial river flow.** It is also the watershed for the Hasdeo Bango reservoir, which is critical for irrigation of 300,000 hectares of double-cropped land in Chhattisgarh. Through camera traps and sign surveys, the WII report has recorded the presence of over 25 species of mammals in the study area – including nine species listed under Schedule I of the Wild Life (Protection) Act, 1972, and thereby accorded the highest protection under Indian law. Further, the report records at least 82 species of birds (including six Schedule I species) and several endangered species of butterflies and reptiles. The region also has rich flora of over 167 plant species, including 18 that are 'Threatened'. The report notes that **"sustaining the forest cover and maintaining its overall ecological integrity is essential."**

**TIGER CONSERVATION:** The WII report notes that tigers have been found dispersing into the study area and surrounding forested landscapes from Kanha Tiger Reserve, Achanakmar Tiger Reserve and Boramdeo Wildlife Sanctuary (a proposed tiger reserve), which lie to the west of HACF. **The report observes that "intact habitat connectivity with tiger source population and relative vastness of the landscape could augur well for recovering tigers",** with the caveat that **"tiger conservation would be conditional on maintaining habitat connectivity [and] retaining forest cover".** Mining in the Hasdeo Aranya forest will therefore severely compromise a critical link in one of the nation's most important tiger landscapes.

**HUMAN-ELEPHANT CONFLICT:** The WII report notes that HACF and the surrounding landscape is **an integral part of the elephant range in northern Chhattisgarh,** with a "conservative minimal estimate" of 40 to 50 elephants using the area at different times of the year. The report also points to the paradox of human-elephant conflict (HEC) in Chhattisgarh, which has less than 1% of the country's elephant population but sees extremely high levels of conflict, with over 15% of reported human deaths and severe damage to crops and property. One of the "main reasons", the report observes, that elephants begin dispersing into human-use areas is the threat to habitat, in particular, threat to their home ranges. **"The coal mines along with the associated infrastructure development would result in loss and fragmentation of habitat",** the report observes. "Mitigating such effects on wildlife, particularly the animals with large home ranges such as elephants is seldom possible. The human-elephant conflict in the state is already acute and has been escalating with huge social and economic costs on the marginal, indigenous local communities. **Any further threat to elephants' intact habitats in this landscape could**

**potentially deflect human-elephant conflict into other newer areas in the state, where conflict mitigation would be impossible for the state to manage.”**

**INDIGENOUS COMMUNITIES:** Residents of the Hasdeo Aranya forest, belonging primarily to **tribal communities, are heavily dependent on the forest for their livelihood, food, water and medicinal needs.** The WII report notes that families get a minimum of 60 to 70% of their annual income from forest based resources. WII conducted interview surveys in 23 villages in the HACF area, finding that **the tribal communities “have a strong affinity towards wildlife and forests” and “favour nature conservation”, perceiving “mining as a direct threat to their livelihood.”**

Gram Sabhas of villages in the region have consistently opposed the clearing of further forest areas in HACF for mining, passing resolutions under the Panchayat Extension to Scheduled Areas (PESA) Act 1996 and Forest Rights Act (FRA) 2006 since 2014. You would be aware, sir, that in October 2021 that **over 300 tribals from the region undertook a foot march to Raipur to demand cancellation of coal mining projects and land acquisition proceedings** that had been initiated under the Coal Bearing Areas Act, 1957 without Gram Sabha consent. The Hasdeo Aranya Bachao Sangharsh Samiti, the joint platform of protesting tribals, has also alleged that recently awarded forest clearance for the Parsa Coal Block is on the basis of forged Gram Sabha consent. The matter has been [widely reported](#) and demands proper investigation.

We also bring to your attention that on June 15, 2015, Hon’ble Member of Parliament (and then Congress Vice President) [Shri Rahul Gandhi had visited Madanpur, Korba](#), where he pledged his **support to the communities battling to protect forests** and made a public statement that he would not support development at the cost of tribals and forests. The recent decision by your government would seem to be a betrayal of that promise.

**RECOMMENDATIONS:** In answering the direct questions posed by the National Green Tribunal in its 2014 order, the WII report unequivocally establishes that the HACF area **“has significant conservation value” and “is/was habitat to rare, endangered and threatened fauna”.** The report recommends that “mining operations may only be permitted in the already operational [PEKB] mine of the block”, and that **“other areas in HACF and landscape surrounding it should be declared as ‘no-go areas’ and no mining should be carried out considering the irreplaceable, rich biodiversity and socio cultural values.”** Indeed, WII suggests that the Chhattisgarh Forest Department, in consultation with local communities, identify areas for declaration as Conservation Reserves.

The report’s assessment findings, it should be noted, are in conformity with the study jointly undertaken by the Ministry of Coal and Ministry of Environment & Forests in nine coal fields across India in 2009, wherein **the Hasdeo-Arand Coal Field in Chhattisgarh was identified as a ‘no-go’ area.**

Sir, given the fact that the WII report was a prime component of the official study commissioned by your government to conduct the biodiversity assessment of the HACF region, it is astonishing that the very

same government, when making its recommendations to the MoEFCC, chose to suppress the findings of this report, instead putting forward only the portion of the assessment conducted by ICFRE.

This ICFRE report, incidentally, also provides strong rationale for the conservation of the Hasdeo Aranya forest:

- It finds that the region is **very important in terms of its phytogeography and occurrence of 33 Rare, Endangered and Threatened (RET) plant species**, recorded both from core and buffer areas of coal blocks.
- It notes that the region is an **“important corridor for movement of flagship species like elephants and tigers in Chhattisgarh”**.
- It warns of **significant geo-morphological/hydrological changes in river water courses** which was already observable and **“is likely to increase further with the expansion of mining”**.
- It points to the deleterious effect of mining on indigenous communities: **“Cumulative Impact of displacement due to mining operations will have serious impact on community in form of loss of livelihood, identity and culture.”**
- It concludes that **“Mining related land use changes will have negative impact on forest cover/density, forest type, forest fragmentation.”**
- With regards to the already operational PEKB mine that is being run by the Adani Group, the ICFRE report notes that **“extensive mining” as opposed to “intensive mining” is resulting in “land degradation which is not specific to particular time, but [will] carry further for the entire life of the mine.”**
- Concerning the existing measures put in place by the Adani Group for the PEKB mine – which the WII report considers to be “basic and generic” in nature – the ICFRE report notes **an overall lackadaisical attitude, with a “random” process of translocating trees and “only [a] few precautions followed during transplanting and post-case”**.

Yet, regrettably, in spite of all these adverse observations, the ICFRE report proceeds to recommend that four coal blocks “can be considered for mining with strict environmental safeguards including appropriate conservation measures for management of surface water and biodiversity”. The only rationale: “the demand for coal and thereby, socio-economic and industrial development of the area under consideration for mining” – which, if we may assert, is a generic statement with no scientific basis and lacks foundation as to how mining would have a favourable socio-economic impact on the area under consideration. On the contrary, evidence from the mining areas of Korba adjoining the HACF clearly indicates that there have been decades of unfulfilled promises and non-compliance of environmental safeguards. Therefore, a mere assurance that there will be compliance with environmental safeguards cannot and should not be considered as a basis to pursue proposals that will have transformative ecological and social consequences.

The ICFRE report’s recommendation not only subverts the aforementioned adverse observations and findings of WII and ICFRE itself, it is beyond the scope of a study that was directed by the National Green Tribunal to merely conduct an assessment of the biodiversity and conservation value of the HACF region.

Sir, given the suppression of the WII report and the internal contradictions between the findings and the recommendations of the ICFRE report, you would excuse us for wondering whether your government's decision to open up the rich and biodiverse Hasdeo Aranya forest for further mining has less to do with the exigencies of 'development' than it does to the convenient exploitation of forest resources and indigenous communities in the name of 'development'.

We urge you to overturn your government's recommendations to the MoEFCC regarding the opening up and expansion of further mining operations in HACF. In doing so, you would only be fulfilling the mandate you have received to safeguard the natural heritage of Chhattisgarh and the lives, livelihoods and rights of indigenous communities.

We request you to kindly acknowledge receipt of this letter and look forward to a positive response.

Yours sincerely,

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- 2) Shri Bhupender Yadav, Minister of Environment, Forest and Climate Change, Government of India
- 3) Shri Rahul Gandhi, Member of Parliament