



### A. ENVIRONMENT CLEARANCE

■ Presently, there are 581 coal mines in India with about 2.1 lakh hectare (ha) mine lease area and the present coal production is of the order of 554 million tonnes (MT). The estimated production capacity for 2012-2013 is about 575 MT.

■ In the last five years, during the 11<sup>th</sup> five year plan (FYP) period (April 2007 – March 2012), 184 coal mines (including projects that applied for capacity expansion) with a production capacity of about 589 million tonnes per annum (MTPA) were given environment clearance (EC) by Ministry of Environment and Forests (MoEF) (see Table 1: Coal mining and Environment clearance during 11<sup>th</sup> FYP). So during the 11<sup>th</sup> FYP, MoEF has granted EC to more than double the coal production capacity in the country.

**Table 1: Coal Mining and Environment clearance during 11<sup>th</sup> FYP**

State	Number of coal mines granted EC	Capacity of coal mines granted EC (MTPA)
Andhra Pradesh	29	48.5
Assam	1	0.15
Chhattisgarh	21	102.9
Gujarat	1	0.3
Jharkhand	32	140.3
Maharashtra	33	44.4
Madhya Pradesh	36	137.8
Orissa	14	95.2
Rajasthan	4	5.5
Uttar Pradesh	1	4
West Bengal	12	9.9
<b>Total</b>	<b>184</b>	<b>588.8</b>

■ The total mine lease area for these 184 coal mines is about 156,130 ha. This is about the same as the total mine lease area with public sector coal mining companies pre-2007. Public sector coal mining companies produce about 90 per cent coal of the country. Thus, during the 11<sup>th</sup> FYP alone, the mine leases for coal and coal production capacity have been more or less doubled.

### B. FOREST CLEARANCE

■ During the 11<sup>th</sup> FYP, 119 coal mining projects have been granted forest clearance (FC) (see Table 2: Coal mining and forest clearance during 11<sup>th</sup> FYP). This includes 70 projects which received final FC and 49 projects which received in-principle FC. This involves about 31,500 ha of forestland diversion. During the 10<sup>th</sup> FYP the total forestland diverted for all mining projects was about 29,000 ha. So forestland diverted for coal mining alone during 11<sup>th</sup> FYP (31,500 ha) is more than the forestland diverted for all mining projects during 10<sup>th</sup> FYP.

**Table 2: Coal mining and forest clearance during 11<sup>th</sup> FYP**

State	Number of projects granted in-principle clearance	Number of projects granted final clearance	Total number of projects	Forestland diverted (in ha)
Andhra Pradesh	6	13	19	5,139.82
Chhattisgarh	11	11	22	12,120.69
Jharkhand	16	26	42	6,949.21
Madhya Pradesh	10	12	22	5,599.21
Maharashtra	3	1	4	407.04
Orissa	2	7	9	1,267.53
West Bengal	1	0	1	4.89
<b>Total</b>	<b>49</b>	<b>70</b>	<b>119</b>	<b>31,488.38</b>

- Seventy coal mining projects were granted final FC leading to forestland diversion of 22,000 ha, while 49 mining projects were granted in-principle FC involving 11,500 ha of forestland diversion.

- The maximum number of coal mines granted final FC were in Jharkhand (26); the maximum forestland diverted for coal mining was in Chhattisgarh (7,654 ha).

- For in-principle clearances, the maximum number were granted to coal mines in Jharkhand (16), while Chhattisgarh involved maximum number of area (4,467 ha).

- Another 45 coal mining projects are pending for FC with the Central and state governments at present (15 with Central and 30 with states). Total forestland involved for these projects is about 15,200 ha.

- The pace of environment and forest clearances granted to coal mining projects during 11<sup>th</sup> FYP has been tremendous. It is contrary to industry's perception about MoEF not granting clearances to projects. In fact, MoEF is granting clearances to projects without considering the cumulative impact of these projects on environment, forests and wildlife. This is becoming quite evident in places like Bellary, Korba, Angul-Talcher, Ib Valley, Singrauli, Chandrapur, etc.

### C. ENVIRONMENT CLEARANCE GRANTED WITHOUT CONSIDERING CUMULATIVE IMPACT

- All coal mining areas have very high levels of pollution and most coal mining companies have very poor environment management record. It is precisely because of this that most coal mining districts were declared as critically polluted areas (CPAs) by MoEF in 2009.

- The monitoring of coal mines by State Pollution Control Boards and the Central Pollution Control Board shows that one-third of the operating coal mines are violating environmental norms. The performance of coal mining companies in mine closure is also very poor. There are at least 240 abandoned coal mines where no reclamation has taken place.

- The problem is that a large proportion of the new coal mining and thermal power projects are also coming up in the same CPAs (see Table 3: *Projects granted environment clearance during 11<sup>th</sup> FYP in critically polluted coalfields*). Since no cumulative assessment was done before granting EC or FC, most of these areas are likely to remain critically polluted.

**Table 3: Projects granted environment clearance during 11<sup>th</sup> FYP in critically polluted coalfields**

District	Coal mining capacity (MTPA)	Coal-based thermal power plant capacity (MTPA)
Korba	77.64+	4,220
Angul-Talcher	72.17+	5,734
Hazaribagh-Chatra	97 (20% of India's current production)	4,135
Singrauli	48.375+	10,080
Chandrapur	25.576+	7,260
Raigarh	19.2+	4,200
Jharsuguda	16.5+	5,095

#### D. IS THERE A NEED FOR MORE COAL MINES?

- It is important to ascertain the kind of coal reserves with each company and their present capacity utilization.
- Coal India Limited (CIL) which produces over 90 per cent of India's coal today, has under its control over 200,000 ha of mine lease area which includes 55,000 ha of forest area. The estimated coal reserves with CIL are 64 billion tonnes but it is currently producing only around 435 million tonnes.
- The question needs to be asked: who is responsible for the shortage of coal in the country when CIL is already sitting on reserves, which it is not mining? It would seem that this process is being done to facilitate the entry of private companies to get access to captive coal-mines. But even these private companies seem to sit on reserves once they obtain it.
- According to the Comptroller and Auditor General (CAG) report (2012) on *Allocation of coal blocks and augmentation of coal production by Coal India Limited*, many private companies have got coal mines in the last few years and many of them have not yet started production. Out of the 86 coal blocks slated to begin production by 2010-11, only 28 had commenced production by March 2011. Actual production from these captive coal blocks was only 34.64 MT, as opposed to a target of 73 MT, a shortfall of 38.36 MT (52%) (see Table 4: Targets and achievements of coal blocks).

**Table 4: Targets and achievements of coal blocks allocated for captive mining**

Year	Target		Achievement		Short-fall from target (in MT)
	No. of coal blocks	Production (in MT)	No. of coal blocks	Production (in MT)	
2007-2008	28	22.48	15	21.25	1.23
2008-2009	58	35.72	25	30.01	5.71
2009-2010	77	47.09	26	35.46	11.63
2010-2011	86	73	28	34.64	38.36
2011-2012	93	104.08			

Source: Adapted from CAG report (2012) pg 13

## E. MINISTRY OF COAL RESPONSE

■ The Centre for Science and Environment (CSE) first released comprehensive facts about EC and FC of the coal mining sector in September 2011. The Ministry of Coal (MoC) responded to CSE's finding via letter dated November 15, 2011.

■ During the 11<sup>th</sup> FYP plan period, 57 forestry proposals of CIL and Singareni Collieries Company Limited (SCCL) (CIL 51; SCCL 6), having an area of 7,908.12 ha (CCL 6,871 ha; SCCL 1,037.12 ha) have been granted forest clearance. Out of these, 5,582.12 ha of forestland has been handed over to CIL and SCCL. In addition to this, 8 forestry proposals of captive coal blocks having an area of 4,282.18 ha have been granted FC. The total number of proposals that have been accorded FC including CIL, SCCL and captive coal blocks works out to 65, and the total forest area involved is 12,190.3 ha. Year-wise details for the 11<sup>th</sup> FYP is tabulated below:

### Coal India Limited (CIL)

Year	No. of proposals	Diverted forestland (ha)
2007-08	4	615
2008-09	22	2,581
2009-10	10	793
2010-11	9	1,140
2011-12	6	1,742
<b>Total</b>	<b>51</b>	<b>6,871</b>

### SCCL

Year	No. of proposals	Diverted forestland (ha)
2007-08	1	231.94
2008-09	3	577.65
2009-10	1	100.82
2010-11		
2011-12	1	126.71
<b>Total</b>	<b>6</b>	<b>1,037.12</b>

### Captive Coal Blocks

Year	No. of proposals	Diverted forestland (ha)
2007-08		
2008-09	2	940.75
2009-10		
2010-11	5	3,324.19
2011-12	1	17.24
<b>Total</b>	<b>8</b>	<b>4,282.18</b>

- EC accorded during the 11<sup>th</sup> FYP period is 192 (CCL- 112; SCCL- 33; Captive- 47) with a total capacity of 388.54 MTPA (CIL- 207.47 MTPA; SCCL- 52.75 MTPA; Captive- 128.32 MTPA). However, it needs to be noted that it is not possible to achieve the sanctioned production capacity immediately after getting the EC due to the involvement of gestation period (5-7 years) in reaching the rated capacity. The yearly detail of ECs for the 11<sup>th</sup> FYP is tabulated below:

#### Coal India Limited (CIL)

Year	No. of proposals	EC Capacity (MTPA).
2007-08	29	39.03
2008-09	17	58.5
2009-10	25	50.05
2010-11	23	27.23
2011-12	3	8.95
<b>Total</b>	<b>112</b>	<b>207.47</b>

#### SCCL

Year	No. of proposals	EC Capacity (MTPA)
2007-08	8	13.14
2008-09	20	26.6
2009-10	4	9.01
2010-11	1	4
2011-12		
<b>Total</b>	<b>33</b>	<b>52.75</b>

#### Captive Coal Blocks

Year	No. of proposals	EC Capacity (MTPA)
2007-08	16	29.35
2008-09	9	30.48
2009-10	12	47.4
2010-11	8	7.59
2011-12	2	13.5
<b>Total</b>	<b>47</b>	<b>128.32</b>

- As on date about, about 228 mines of CIL fall under the category of violation of different environmental norms. Out of these mines, around 220 are pre 1994/legacy mines. These mines did not have any environmental clearances and were in operation through renewal of leases only. On promulgation of EIA Notification 2006, and with affirmative nod from the MoEF, all these mines are grouped into clusters for obtaining fresh ECs. MoEF has principally agreed to the cluster concept of old legacy mines and all are in the process of obtaining EC and are pending at different stages of the process. For remaining mines also, action have already been initiated for EC. This means that proper EIA/EMP reports have been prepared and submitted to SPCB/MoEF for all these mines/clusters for obtaining EC.

- In conclusion, the Ministry of Coal itself has accepted the following facts regarding EC and FC of coal mining:

- 65 coal mines were granted final FC.
- 389 MTPA worth of coal mining were given EC. Why is it then that MoC instead of operationalising these mines is asking for more clearances?