



MINERAL INHERITORS RIGHTS ASSOCIATION

Date: 07.09.20

Dr Veena Kumari Dermal

Director

Government of India

Ministry of Mines

Room 308, D-Wing, Shastri Bhawan

New Delhi 110001

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Dear Dr. Dermal,

This is in reference to your notice regarding extension of deadline for comments on proposed mining reforms dated 3rd September which was in fact uploaded on 5th September on the Ministry's webpage. The timeline has been extended till 10th September which is additional 6 days. Referring to our earlier letter (dated 28.08.20) addressed to you, we had expressed our discontent explicitly stating the violations of Pre-Legislative Consultation Policy and Right to Information Act. The Ministry's decision on this short extension which is still less than 30 days is strange and self-defeating. We had also indicated on the lack of information in the document, which is a statutory requirement under the RTI Act. In addition, as you may be aware, in a recent order, the courts mandated translation into several languages and wider access to information so that meaningful participation could be enabled. None of these points raised by us have been reflected in the revised notice, neither did the Ministry respond to our queries. It compels us to question the unfair approach of ignoring the law and procedures endangering the fundamental requisite of public consultation and providing adequate data & information.

We condemn the ambiguity of this entire process and thereby call for scrapping of the proposed mining reforms till the stated concerns are completely addressed. We firmly believe in the constitutional process that should be followed in policy matters and would like to reiterate that effective public consultation is of utmost importance in this regard. Ignoring the concerns of the citizens of this nation, particularly excluding the affected communities will be more damaging to the fabric of a democratic society.

In anticipation of a positive outcome.

Best regards,

Saswati Swetlena

National Coordinator, Mineral Inheritors Rights Association

(On behalf of the Steering Committee of Mineral Inheritors Rights Association)