

S U P R E M E C O U R T O F I N D I A
RECORD OF PROCEEDINGS

Writ Petition(s) (Civil) No(s). 562/2009

SAMAJ PARIVARTANA SAMUDAYA & ORS.

Petitioner(s)

VERSUS

STATE OF KARNATAKA & ORS.

Respondent(s)

(1. I.A. No. 232/2014 (Directions) 2. I.A. No. 21884/2020 (Application for Directions) 3. I.A. No. 62872/2020 (Application for permission to file Intervention) 4. I.A. No. 60662/2020 (Application for Intervention) 5. I.A. No. 60664/2020 (Application for Directions) 6. I.A. No. 85163/2020 (Application for Directions) 7. I.A. No. 134904, 134905 and 134908/2020 (Application for permission to Intervention, Directions and O.T) 8. I.A. No. 124132/2022 and 225310/2023 (Application for Clarification) 9. I.A. No. 126135/2022 (Directions) 10. I.A. No. 136998/2022 (Application for Directions) 11. I.A. No. 147511 and 147514/2022 (Application for Directions and exemption form filing O.T.) 12. I.A. No. 137180/2022 in 67230 (Application for Directions) 13. I.A. No. 137183/2022 in 67231/2021 (Application for Directions) 14. I.A. Nos. 70118, 70119, 70124, 70125 of 2023 (Application for permission to file application for impleadment, impleadment, Directions, and O.T.) 15. I.A. No. 225561/2023 (Application for directions) 16. I.A. No. 172165/2023 (Permission to file Directions) 17. I.A. No. 48719/2024 (Application for directions) 18. I.ANO. 76075 of 2018 (Application for Modification of Court's order dated 21.03.2018) 19. I.ANO 79174, 79175 & 79176/2024 (Permission, Impleadment & Direction) 20. I.ANOS. 56287 & 56284/2023 (Directions & Permission to file Directions) 21. I.ANO 180996/2024 (Permission to file additional documents) 22. I.ANO 184097/2024 (Direction) 23. I.ANO 231880 & 231882/2024 (Permission & Direction) 24. IA.NO 78351/2025, 264328/2025 (Direction &Permission to file Additional Documents) 25. I.ANO 88854 & 88855 & 88856/2025 (Permission, Impleadment and Direction) 26. I.ANO 136808, 136809, 136810/2025 (Permission, Impleadment and Direction) 27. I.ANO 162768/2025 (Direction) 28. I.ANO 170903/2025 (Impleadment) 29. I.ANO 199419/2025 (Direction) 30. I.ANO 233244, 233893 & 233895/2025 (Direction, Permission, Impleadment) 31. I.ANO 235188/2025 (Direction) 32. I.ANO 15317 & 32854/2026 (Early Hearing) 33. I.A. NO. 231882, 231881 & 231880/2025 (Directions, O.T. & Permission) 34. I.A. NO. 223868/2025 (Directions) 35. I.A. NO. 237353/2026 (CLARIFICATION/DIRECTION) THE FOLLOWING ADVOCATES MAY BE SHOWN AGAINST THIS MATTER : MR. SHYAM DIVAN, SR. ADVOCATE (A.C.), MR. SIDDHARTH CHOWDHARY, ADVOCATE (A.C.), MR. SUDIPTO SIRCAR, ADVOCATE (A.C.), MR. PRASHANT BHUSAN, ADV. 1. MR. JAYANT MOHAN, ADV. 2. MR. KUMAR DUSHYANT SINGH, ADV. 3. MR. SHUBHRANSHU PADHI, ADV. 4. MS. SURBHI MEHTA, ADV. 5. MR. RITU RAJ BISWAS, ADV. 6. MR. ISHANT GEORGE, ADV. 7. MR. RANJAN KUMAR PANDEY, ADV. 8. MR. VARDHMAN KAUSHIK, ADV. 9.

MR. YASHRAJ SINGH DEORA, ADV. 10. M/S. NULI AND NULI, ADVS. 11. MR. V.N. RAGHUPATHY, ADV. 12. M/S. LEX REGIS LAW OFFICES, ADVS. 13. MR. RANJEET SINGH, ADV. 14. M/S. KHAITAN AND CO., ADVS. 15. MR. SANCHIT GARGA, ADV.

IA No. 237353/2026 - CLARIFICATION/DIRECTION)

WITH

SLP(C) No. 3585-3586/2024 (IV-A)

(IA No. 253645/2025 - APPROPRIATE ORDERS/DIRECTIONS, IA No. 236242/2024 - APPROPRIATE ORDERS/DIRECTIONS, IA No. 131439/2025 - PERMISSION TO FILE ADDITIONAL DOCUMENTS/FACTS/ANNEXURES and IA No. 205913/2025 - PERMISSION TO FILE APPLICATION FOR DIRECTION)

Date : 08-09-2026 These matters were called on for hearing today.

CORAM : HON'BLE THE CHIEF JUSTICE
HON'BLE MR. JUSTICE JOYMALYA BAGCHI
HON'BLE MRS. JUSTICE V. MOHANA

For Petitioner(s) :Mr. Prashant Bhushan, AOR
Mr. Anurag Tiwary, Adv.

Mr. Shashi Kiran Shetty, Advocate General
Mr. Nishanth Patil, A.A.G.
Mr. Sanchit Garga, AOR
Mr. Shashwat Jaiswal, Adv.
Mr. Bhanu Pratap Singh, Adv.
Ms. Oorja Goel, Adv.

For Respondent(s) :Mr. P. S. Sudheer, AOR
Mr. Jayant Mohan, AOR

Mr. Kapil Sibal, Sr. Adv.
Mr. Aditya Narayan, Adv.
Mr. Rohit Sharma, Adv.
Mr. Rahul Pandey, Adv.
Mr. Nikhil Purohit, Adv.
Mr. Jatin Lalwani, Adv.
Ms. Prerna Prakash, Adv.
Mr. Rohit Amit Sthalekar, AOR
Mr. Siddhant Singh, Adv.

Mr. Kunal Verma, AOR

Mr. Neeraj Shekhar, AOR
Mr. Rajesh Maurya, Adv.
Mr. Ujjwal Ashutosh, Adv.
Mr. Ritwik Prasad, Adv.
Mr. Amrendra Singh, Adv.
Ms. Minakshi Singh, Adv.
Mr. Anand Krishna, Adv.

Mr. Prakash Kumar Singh, AOR

Mr. K M Nataraj, A.S.G.
Mr. Sudarshan Lamba, AOR
Ms. Indira Bhakar, Adv.
Mr. Shubhranshu Padhi, Adv.
Mr. Rajat Nair, Adv.
Ms. Vimla Sinha, Adv.
Mr. B K Satija, Adv.
Mr. Pranay Ranjan, Adv.
Mr. Rajeeva Ranjan Rajesh, Adv.

Ms. A. Sumathi, AOR

Mr. K.M. Natraj, A.S.G.
Mrs. Shradha Deshmukh, Adv.
Mr. Shubhranshu Padhi, Adv.
Mr. Rajat Nair, Adv.
Mr. T.s. Sabarish, Adv.
Mr. S.n.terdal (aor), Adv.
Mr. Rajesh Kumar Singh, Adv.
Mr. R.r. Rajesh, Adv.
Mr. Shailesh Madiyal, Adv.
Mr. Dr. N Visakamurthy (aor), Adv.
Mr. Mukesh Kumar Maroria, AOR

Mr. Ranjit Kumar, Sr. Adv.
Ms. Ruchi Kohli, Sr. Adv.
Mr. Ankur S. Kulkarni, Adv.
Mr. Nirnimesh Dube, Adv.
Ms. Uditha Chakravarthy, Adv.
Mr. Debdeep Banerjee, Adv.
Mr. Abhay Singh Yadav, Adv.
M/s Lex Regis Law Offices, AOR

Mrs. Anil Katiyar, AOR

Mr. Krishnan Venugopal, Sr. Adv.
Mr. Sanjeev K. Kapoor, Adv.
Mr. Avirat Kumar, Adv.
Ms. Sania Abbasi, Adv.
Ms. Umang Motiyani, Adv.
Mr. Pulkit Goyal, Adv.
M/s Khaitan & Co., AOR

Mr. Chandra Prakash, AOR
Mr. Raj Bahadur Yadav, AOR
Mrs. Sudha Gupta, AOR

Mr. Sumit Goel, Adv.
Ms. Swati Bhardwaj, Adv.
Mr. Siddharth Samaiya, Adv.
Mr. Akhil Shresth, Adv.

M/S. Parekh & Co., AOR

Mrs. Anjani Aiyagari, AOR
Mr. Munawwar Naseem, AOR
Mr. Chanchal Kumar Ganguli, AOR
Mr. Adarsh Upadhyay, AOR

Ms. Adviteeya, Adv.
Mr. Rakesh K. Sharma, AOR

Mr. K.M. Nataraj, A.S.G.
Mr. Shubranshu Padhi, Adv.
Mr. Rajat Nair, Adv.
Mr. Kanu Agrawal, Adv.
Ms. Suhashini Sen, Adv.
Mr. S.k.singhania, Adv.
Mr. T.s.sabarish, Adv.
Mr. Ashok Kumar, Adv.
Mr. Gopi Chand, Adv.
Mr. Arvind Kumar Sharma, AOR
Dr. Arun Kumar Yadav, Adv.

Mr. Bhargava V. Desai, AOR

Mr. Vivek Vishnoi, Adv.
Mr. Abhishek Sharma, AOR

Mr. Anil Kumar Mishra-i, AOR

Mr. Ankur S. Kulkarni, AOR
Ms. Uditha Chakravarthy, Adv.
Mr. Abhay Singh Yadav, Adv.

Mr. G. N. Reddy, AOR

Mr. Gaichangpou Gangmei, AOR
Mr. Arjun D. Singh, Adv.
Mr. Maitreya Mahaley, Adv.
Mr. Yimyangner Longkumer, Adv.
Mr. Kamei Bestman Kabui, Adv.
Mr. Sachu G, Adv.

M/S. A P & J Chambers, AOR

Mr. Shashi Kiran Shetty, Advocate General
Mr. Nishanth Patil, A.A.G.
Mr. Sanchit Garga, AOR
Mr. Shashwat Jaiswal, Adv.
Mr. Arijit Dey, Adv.
Mr. Bhanu Pratap Singh, Adv.
Mr. Vijender Kumar, Adv.
Ms. Oorja Goel, Adv.
Ms. Ranjeeta Rohatgi, AOR

Mr. Samir Ali Khan, AOR
Mr. Kashif Khan, Adv.
Ms. Komal Vats Singh, Adv.
Mrs. Kirti Renu Mishra, AOR
Mr. Shubhanshu Padhi, AOR
Mr. Balaji Srinivasan, AOR
Mr. Vikas Mehta, AOR
M/S. Karanjawala & Co., AOR

Dr. Sushil Balwada, AOR
Mr. Sandiv Kalia, Adv.
Ms. Zoya Sengupta, Adv.
Mr. Nandlal Kumar Mishra, Adv.
Mr. Sahil, Adv.
Mr. Onkar Nath Sharma, Adv.

Mr. Akhil Anand, AOR
Mr. Rajeev Maheshwaranand Roy, AOR
Mr. Prashant Kumar, AOR
Mr. A. Raghunath, AOR

Mr. Snehasish Mukherjee, AOR
Mr. Tamal Sanyal, Adv.
Mr. Piyush Malik, Adv.
Mr. Bhaskar Malakar, Adv.
Mr. Maneesh, Adv.
Mr. Vishal Agarwal, Adv.
Mr. Rajesh Kanwal, Adv.

Ms. Manjula Gupta, AOR
Mr. Dinesh Kumar Garg, AOR
Mr. Merusagar Samantaray, AOR
Mrs. Vaijayanthi Girish, AOR

Mr. Rohit Sharma, Adv.
Mr. Aditya Narayan, Adv.
Mr. Nikhil Purohit, Adv.
Mr. Jatin Lalwani, Adv.
Ms. Prerna Prakash, Adv.
Mr. Giri Raj Singh, Adv.
Mr. Kumar Dushyant Singh, AOR

Mr. V. N. Raghupathy, AOR

Mr. Guntur Pramod Kumar, AOR
Ms. Prerna Singh, Adv.
Ms. Rakshita, Adv.

Mr. K.M. Nataraj, A.S.G.
Mr. Gurmeet Singh Makker, AOR
Mr. Shubhanshu Padhi, Adv.
Mr. Rajat Nair, Adv.

Mr. Shailesh Madiyal, Adv.
Mr. Kanu Agrawal, Adv.
Ms. Suhasini Sen, Adv.
Mr. S.K. Singhania, Adv.
Mr. T.S. Sabarish, Adv.
Mr. Rohan Gupta, Adv.

Mr. Ishaan George, AOR
Dr. Rukma George, Adv.
Mr. Sumit Kumar Siddharth, Adv.
Mr. Aman Ahluwalia, Adv.
Mr. Pradul Singhal, Adv.

Mr. K.M. Nataraj, A.S.G.
Mr. Shubranshu Padhi, Adv.
Mr. Rajat Nair, Adv.
Mr. Kanu Agrawal, Adv.
Ms. Suhashini Sen, Adv.
Mr. S.k.singhania, Adv.
Mr. T.s.sabarish, Adv.
Mr. Ashok Kumar, Adv.
Mr. Gopi Chand, Adv.
Mr. Arvind Kumar Sharma, AOR
Dr. Arun Kumar Yadav, Adv.

Mr. Anupam Lal Das, Sr. Adv.
Mr. Raktim Gogoi, Adv.
Mr. Amit Sharma, Adv.
Mr. Kartikeya Singh, AOR
Mr. Vaibhav Tomar, Adv.
Ms. Akshita Nigam, Adv.
Mr. Kanhaiya Singla, Adv.
Mr. Anirudh Singh, Adv.
Mr. Kaushalendra Dutt Pandey, Adv.
Ms. Gayatri Gokulakrishnan, Adv.
Mr. Atrabhuvan Singh Bhadureya, Adv.

Mr. Pranaya Kumar Mohapatra, AOR

Mr. Mahesh Thakur, AOR
Mr. Narveer Yadav, Adv.
Mr. Siddhartha Sati, Adv.

M/S. Nuli & Nuli, AOR

Mr. K.M. Nataraj, A.S.G.
Mr. Shubranshu Padhi, Adv.
Mr. Rajat Nair, Adv.
Mr. Kanu Agrawal, Adv.
Ms. Suhashini Sen, Adv.
Mr. S.k.singhania, Adv.
Mr. T.s.sabarish, Adv.
Mr. Amrish Kumar, AOR

Dr. Arun Kumar Yadav, Adv.

Mr. Ranjit Kumar, Sr. Adv.
Mr. Kn Phanindra, Sr. Adv.
Mr. Sahil Tagotra, AOR
Ms. Shreya Kasera, Adv.
Mr. Abhishek Pandey, Adv.

Mr. E. C. Agrawala, AOR

Mr. R. Venkataramani, Attorney General for India
Mr. K. Raghavacharyulu, Adv.
Mr. Kailash Pandey, Adv.
Mr. Ranjeet Singh, AOR
Mr. Krishna Yadav, Adv.
Ms. Yamika Khanna, Adv.
Ms. K. Bharathi, Adv.
Mr. Sanjay Kumar, Adv.
Mr. Ketan Joshi, Adv.

Mr. S. S. Shroff, AOR

Mr. R. Venkataramani, Attorney General for India
Mr. K. Raghavacharyulu, Adv.
Mr. Kailash Pandey, Adv.
Mr. Ranjeet Singh, AOR
Mr. Krishna Yadav, Adv.
Ms. Yamika Khanna, Adv.
Ms. K. Bharathi, Adv.
Mr. Sanjay Kumar, Adv.
Mr. Ketan Joshi, Adv.

Mr. V. N. Raghupathy, AOR
M/S. Nuli & Nuli, AOR

Mr. Gaichangpou Gangmei, AOR
Mr. Arjun D. Singh, Adv.
Mr. Maitreya Mahaley, Adv.
Mr. Yimyangner Longkumer, Adv.
Mr. Kamei Bestman Kabui, Adv.
Mr. Sachu G, Adv.

Ms. Hetu Arora Sethi, AOR
Mr. Pulkit Tare, AOR

Ms. Aastha Mehta, Adv.
Ms. Deepanwita Priyanka, AOR
Ms. Prerana Mohapatra, Adv.
Ms. Prina Sharma, Adv.

Mrs. Anil Katiyar, AOR

Mr. Atmaram N.S. Nadkarni, Sr. Adv.

Mr. Yashraj Singh Deora, Sr. Adv.
Mr. Krishna Rastogi, Adv.
Mr. Priyesh Mohan Srivastava, Adv.
Mr. Aryan Srivastava, Adv.
Ms. Deepti Arya, Adv.
Mr. Manisha Gupta, Adv.
Ms. Himanshi Nagpal, Adv.
Mr. Sameer Abhyankar, AOR

Mr. Krishnan Venugopal, Sr. Adv.
Mr. Sanjeev K. Kapoor, Adv.
Mr. Avirat Kumar, Adv.
Ms. Sania Abbasi, Adv.
Ms. Umang Motiyani, Adv.
Mr. Pulkit Goyal, Adv.
M/s Khaitan & Co., AOR

Mr. Sudipto Sircar , AOR

Mr. Manish Singhvi, Sr. Adv.
Mr. Rituraj Biswas, AOR
Mr. Mayan Prasad, Adv.
Ms. Sujaya Bardhan, Adv.
Mr. Aayush Garg, Adv.

Mr. Vardhman Kaushik, AOR
Mr. Dhruv Joshi, Adv.
Mr. Arindam Sarin, Adv.

Ms. Rohini Musa, AOR
M/S. Aura & Co., AOR
Mr. A. Raghunath, AOR

Mr. Kapil Sibal, Sr. Adv.
Mr. Vikas Singh, Sr. Adv.
Mr. Gaurav Sharma, Sr. Adv.
Mr. Jayant Mohan, AOR
Mr. Bhawal Mohan, Adv.
Ms. Adya Shree Dutta, Adv.
Ms. Dorjee Ongmu Lachungpa, Adv.
Mr. Priyanshu Teotia, Adv.

Mr. K.M. Nataraj, ASG
Mr. Subhranshu Padhi, Adv.
Ms. Vimla Sinha, Adv.
Mr. Rajeeva Rajan Rajesh, Adv.
Ms. Indira Bhakar, Adv.
Mr. Rajat Nair, Adv.
Mr. Pranay Ranjan, Adv.
Ms. Osheen Jain, Adv.

UPON hearing the counsel the Court made the following

O R D E R

IA No.199419/2025

1. Since the core issue that requires determination is whether the subject leased land is revenue land or forest area, and vide Order dated 13.11.2019, such an issue has been remanded by this Court for adjudication to Karnataka High Court; this application is disposed of with a request to the High Court to take up the pending issue and make an endeavour to decide the same, preferably within three months. The application accordingly stands disposed of.

Main Matter

2. In terms of our last order dated 13.08.2026, Mr. Shyam Divan, learned Senior Advocate and Amicus Curiae, has placed before us a note dated 07.09.2026, wherein, after setting out the background of the matter and advertng to Report No. 20 of 2026 filed by the Central Empowered Committee (CEC), he has classified the pending interlocutory applications into six categories, namely:

Category I	Mineral Sale from Expired Leases
Category II	Issue related to fixation of MPAP
Category III	Issue of Amalgamation of Mining Blocks of Different Categories and Virgin Forest Land for Auction
Category IV	Issue related to B-1 category mines situated near the inter-state boundary of Karnataka & Andhra Pradesh
Category V	Issues related to refund of earnest money / guarantee money
Category VI	Miscellaneous Matters

3. This order deals with the interlocutory applications falling under Category I & III (details reflected in the Office Order dated 08.09.2026).

Category I: Mineral Sale from Expired Leases

4. Learned Amicus has drawn our attention to Rule 12(1)(gg) of the Minerals (Other than Atomic and Hydrocarbons Energy Minerals) Concession Rules, 2016 ("MCR, 2016"), which requires an erstwhile lessee to remove mineral excavated during the subsistence of the lease within a maximum period of six months from the date of expiry of the lease period. He has also pointed out Rule 12(1)(hh) of MCR, 2016, which further provides that minerals not removed within one month of being notified by the State Government shall be deemed to become the property of the State Government.
5. Learned Amicus has also taken us through the Order of this Court dated 23.09.2011, whereby the existing stock of iron ore (and manganese) in the mining leases was directed to be sold through e-auction conducted by the Monitoring Committee constituted by this Court. This regime was, however, discontinued by subsequent Orders dated 20.05.2022 and 21.07.2022, whereby the respective lessees were permitted to sell the mineral directly, including by way of export.
6. In this backdrop, learned Amicus has submitted that ordinarily wherever the periods prescribed under Rules 12(1)(gg) and 12(1)(hh) of MCR, 2016 have elapsed, the mineral would be liable to become the property of the State of Karnataka, and the same ought to be permitted. However, having regard to the regime of e-auction through the Monitoring Committee mandated by this Court, during the subsistence of which lessees stood debarred from disposing of the mineral on their own, he has suggested the respective lessee may be permitted to dispose of the mineral, and/or to claim lien on the value of such mineral if already sold under the directions of this Court, provided each of the following eleven conditions are fulfilled:
 - i. The lessee had approached this Court seeking permission for disposal of the mineral before expiry of the lease period or, at the latest, immediately thereafter.
 - ii. The lease falls within Category A or Category B, as classified in terms of the judgment of this Court dated

18.04.2013.

- iii. In the case of Category B leases, the R&R plan approved by the CEC in accordance with the guidelines prescribed by this Court by Order dated 13.04.2012 has been successfully implemented.
- iv. Recommencement of mining operations has been approved in terms of the Orders of this Court dated 28.09.2012 and 18.04.2013.
- v. The MPAP has been approved by the CEC in terms of the R&R guidelines approved by Orders of this Court dated 13.04.2012.
- vi. In the case of Category B leases, the guarantee money towards implementation of the R&R Plan and compensation, as payable under the judgment of this Court dated 18.04.2013, has been deposited with the Monitoring Committee.
- vii. The mineral sought to be sold was duly recorded in the returns filed with the IBM on or before expiry of the lease period (statutory requirement).
- viii. The lessee possesses valid Environmental Clearance and Forest Clearance, wherever applicable, for the forest land comprised in the lease, at the time of the expiry of the lease period.
- ix. The aggregate quantity of mineral already sold, together with the balance quantity proposed to be sold, does not exceed 5% of the mineral quantity declared in the returns filed with the IBM prior to September 2011, when this Court permitted sale of the existing stock of mineral. (Applicable only in respect of old stock as available in September 2011).
- x. The proposed sale does not involve any processing or extraction of mineral from overburden dumps, as such activity would amount to fresh mining operations.
- xi. The proposed sale does not involve mineral lying in stockyards, which is governed by the separate orders passed by this Court on 20.04.2012.

7. On the basis of the aforesaid, learned Amicus has made three

submissions.

- (a) First, that I.A. No. 124132 of 2022, filed by the State of Karnataka seeking clarification of the Orders dated 20.05.2022 and 21.07.2022, be allowed to the extent that the said orders do not govern the material/quantity of ore lying in respect of expired mining leases, and that the State Government would be entitled to act in terms of Rules 12(1)(gg) and 12(1)(hh) of MCR, 2016 after expiry of the stipulated period; and further, that the said orders would not enure to the benefit of lease holders who do not possess Environmental Clearance and Forest Clearance, such cases being liable to be dealt with in terms of the principles recommended above.
- (b) Secondly, that I.A. Nos. 205913/2025, 253645/2025, 236242/2024 and 131439/2025 in SLP (C) Nos. 3585-3586/2024, which pertain to the very same lease and in respect of which all the aforesaid conditions stand fulfilled, be disposed of in terms of the recommendations of the CEC, by permitting release of the sale proceeds in favour of the applicant therein.
- (c) Thirdly, that all other IAs falling under Category I, in which the CEC has recommended rejection of the prayers made, be remitted to the CEC for fresh examination with reference to the aforesaid principles, for submission of its recommendations for further directions of this Court.

8. We have considered the submissions of the learned Amicus, learned Senior Counsel/Counsel for the parties, perused the Report of the CEC, and the material on record, including the orders of this Court referred to above. We find merit in, and accordingly accept and approve all the eleven conditions set out above as the governing framework for permitting sale or disposal of mineral excavated during the subsistence of expired mining leases. These conditions have been carefully calibrated to reconcile the statutory mandate of Rules 12(1)(gg) and 12(1)(hh) of MCR, 2016 with the peculiar circumstance that lessees stood restrained from

independently disposing of mineral during the period the Court-monitored e-auction regime was in force, and to ensure that the safeguards built into the R&R and MPAP framework, and the requirement of valid environmental and forest clearances, are not diluted.

9. We accordingly hold that these conditions are mandatory in character and must be strictly complied with before any lessee is permitted to dispose of mineral from an expired lease or to claim lien over the proceeds of mineral already sold. No relaxation of any of the said conditions shall be granted save by an order of this Court.
10. In terms of the foregoing, I.A. No. 124132 of 2022 is disposed of with the clarification that sale of iron ore excavated during the subsistence of the lease, but remaining with the erstwhile lessee upon expiry of the lease period, shall be governed strictly by the eleven conditions enumerated in paragraph 6 above; and further, that Orders dated 20.05.2022 and 21.07.2022 shall not enure to the benefit of lease holders who do not possess valid Environmental Clearance and Forest Clearance.
11. Insofar as I.A. Nos. 205913/2025, 253645/2025, 236242/2024 and 131439/2025 in SLP (C) Nos. 3585-3586/2024 are concerned, the learned Advocate General for the State of Karnataka has raised certain objections and has sought time to place the State's response on record. In the interest of justice, two weeks' time is granted to the State of Karnataka to file its response. These IAs shall be listed for disposal on the date fixed.
12. As regards the remaining IAs falling under Category I (*reflected at Sl. Nos.2-20, 22, 23 and 24 of the Office Report dated 08.09.2026*), in which the CEC has recommended rejection of the prayers made therein, we accept the submission of the learned Amicus and remit all such IAs to the CEC, with a direction to examine them afresh with reference to the eleven conditions approved hereinabove, and to submit its recommendations for further directions of this Court. During this exercise, State of

Karnataka would be entitled to make its submission with regard to compliance with conditions (i) to (xi) enumerated in paragraph (6) as well as refute the Amicus' contention that the lessees were unable to dispose of the minerals within the time stipulated under Rule 12 (1)(gg) of MCR 2016 and thereby has become Government property under Rule 12 (1)(hh) of the said Rules.

Category III: Issue of Amalgamation of Mining Blocks of Different Categories and Virgin Forest Land for Auction

13. Turning next to the IAs falling under Category III, that is, the issue of amalgamation of mining blocks of different categories and virgin forest land for auction, learned Amicus has submitted that this Court may permit the amalgamation of erstwhile mining leases falling under Category A, Category B and Category C, together with virgin forest land, so as to constitute a compact block for the purposes of auction. He submits that such amalgamation, however, ought to be made subject to certain conditions.
14. In the first place, he submits that no mining in the virgin forest portion of any such block shall be permissible unless approval under the Forest (Conservation) Act, 1980 is obtained in respect of that portion, and that in the remaining area of the block, mining may be permitted only where the relevant statutory clearances are already in place. He further submits that mining operations in such blocks, including the grant of any Temporary Working Permission, shall be strictly governed by the Mines and Minerals (Development and Regulation) Act, 1957, ("MMDR Act") the rules framed thereunder, and the terms and conditions subject to which the auction of the concerned block has been conducted.
15. Learned Amicus has further submitted that the State Government may be permitted to execute mining leases over the entire area of such amalgamated blocks, subject to an undertaking by the successful lessee that mining shall not commence in the virgin forest areas comprised therein until the necessary statutory

approvals and clearances in respect of such areas have been obtained. As regards the broken-up portions of the amalgamated blocks that were held under the erstwhile leases, he submits that the statutory approvals and clearances standing in the name of the previous lessees may be permitted to be transferred to, and vested in, the successful lessee in terms of Section 8B of the MMDR Act, so that continuity of compliance is maintained without requiring clearances to be obtained afresh.

16. Lastly, learned Amicus submits that the circulars and guidelines applicable to auctioned mining leases shall continue to apply with full force to such amalgamated blocks, and that the guidelines for preparation of Reclamation and Rehabilitation Plans approved by this Court by Order dated 13.04.2012, and reiterated in the orders of this Court thereafter, shall likewise be strictly followed in respect of such blocks.
17. Mr. Prashant Bhushan has strongly opposed those IAs for amalgamation as, according to him, permitting the amalgamation of mining leases of different categories, together with virgin forest land, would have deleterious environmental consequences, inasmuch as it would open up ecologically sensitive virgin forest areas to large-scale mining activity carried on in conjunction with the adjoining leased areas. He further added that such amalgamation would result in the creation of oligopolies within the mining industry, since only a few large firms would possess the financial capacity to acquire and operate such amalgamated blocks, thereby enabling such firms to dominate the industry and corner a disproportionate share of the market.
18. We have considered the aforesaid submissions. Amalgamation of mining leases of different categories, together with virgin forest land, into a single compact block is, in our view, a matter of operational rationalisation that this Court may permit, provided the safeguards this Court has consistently applied in the course of monitoring mining activity in the State of Karnataka are not thereby diluted. Virgin forest land stands on a distinct

footing, and its inclusion within an amalgamated block cannot be treated as clearing the way for mining therein; the requirement of prior clearance under the Forest (Conservation) Act, 1980 must remain intact and unaffected by the fact of amalgamation.

19. Equally, the execution of a composite lease over the entire block must not be read as conferring a right to mine any part of it in respect of which statutory clearances are not yet in place. We are further of the view that the transfer of statutory approvals and clearances of the previous lessees to the auction-purchasers under Section 8B of the MMDR Act, in respect of the broken-up portions of such blocks, is consistent with the statutory scheme and serves the purpose of avoiding needless duplication of the clearance process without compromising compliance. The continued applicability of the R&R guidelines approved by this Court, and of the circulars and guidelines governing auctioned leases, ensures that the rehabilitation and monitoring framework painstakingly put in place by this Court over the years remains undisturbed by the process of amalgamation.
20. We accordingly accept the submissions of the learned Amicus and permit the amalgamation of erstwhile mining leases falling under Category A, Category B and Category C, together with virgin forest land, into compact blocks for the purposes of auction, subject to strict compliance with the following conditions:
 - (i) No mining shall be undertaken in the virgin forest portion of any amalgamated block unless approval under the Forest (Conservation) Act, 1980 is obtained, and in the remaining area, mining shall be permitted only where the relevant statutory clearances are in place;
 - (ii) Mining operations, including any Temporary Working Permission, shall be strictly governed by the MMDR Act, the rules made thereunder, and the terms and conditions of the auction;
 - (iii) The State Government may execute mining leases over the entire area of the amalgamated block, subject to an

undertaking that mining in the virgin forest areas shall not commence until the necessary statutory approvals and clearances therefor are obtained;

- (iv) In respect of the broken-up portions of the amalgamated blocks, the statutory approvals and clearances of the previous lessees may be transferred to and vested in the auction-purchasers in terms of Section 8B of the MMDR Act;
- (v) The applicable circulars and guidelines governing auctioned leases shall be strictly followed; and
- (vi) The guidelines for preparation of R&R Plans approved by this Court by Order dated 13.04.2012, and reiterated thereafter, shall be strictly followed.

21. I.A. Nos. 184097/2024 and 223868/2025 are accordingly disposed of in terms of the directions and conditions set out above.

22. List the main matter for further consideration on 29.09.2026.

(NITIN TALREJA)
ASTT. REGISTRAR-cum-PS

(PREETHI DILEEP KUMAR)
DY. REGISTRAR