



**ENVIRONMENTAL PROTECTION AGENCY**  
CLIMATE CHANGE, FORESTRY, ENVIRONMENT  
&  
WILDLIFE DEPARTMENT  
GOVERNMENT OF KHYBER PAKHTUNKHWA



No. EPA/EIA/Battery/SMJ/Hattar/Haripur/25/ 7305-08

Date: 08/08/2025

To

Muhammad Musa Bin Haroon,  
CEO S.M.J International Industries Pvt, Limited, Plot No: 19/1, Phase I & II,  
Industrial Estate Hattar, Haripur.  
House No. 49, Street 01, Sector F-6/3, Islamabad  
Phone# 0321-5515510.

Subject: **DECISION ON THE EIA REPORT OF M/S SMJ  
INTERNATIONAL INDUSTRIES PRIVATE LIMITED (BATTERY  
MANUFACTURING UNIT) INDUSTRIAL ESTATE HATTAR,  
HARIPUR., PLOT NO: 19/1, PHASE I & II, INDUSTRIAL  
ESTATE HATTAR, HARIPUR.**

With reference to the subject cited above, please find enclosed herewith the Construction Phase Environmental Approval/Decision Note on EIA Report of the subject project for your information and further implementation.

Moreover, **Schedule-X** must be submitted to this Agency within a month on Stamp Paper as an undertaking for the compliance of terms and conditions as mentioned in the Environmental Approval as well as mitigation measures proposed in the EIA Report. (Copy enclosed).

*[Handwritten signature]*  
**Deputy Director (MEAs)**

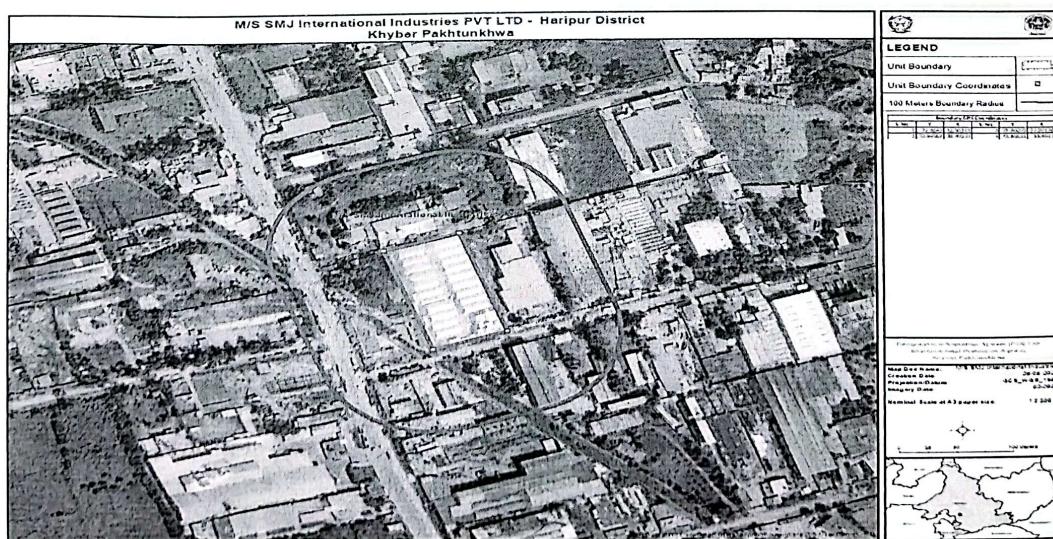
**Copy for information and necessary action to the;**

- Director (North), EPA Northern Directorate, Abbottabad.
- GIS Specialist, EPA, HQ, Peshawar.
- P.A to Director General EPA, KP.

## **SCHEDULE-VII DECISION ON EIA**

|                                       |  |
|---------------------------------------|--|
| <b>1. Name, address of proponent:</b> | Muhammad Musa Bin Haroon,<br>CEO S.M.J International Industries Pvt, Limited, Plot<br>No: 19/1, Phase I & II, Industrial Estate Hattar,<br>Haripur.<br>House no: 49, Street 01, Sector F-6/3, Islamabad<br>Phone# 0321-5515510.  |
| <b>2. Description of project.</b>     | The title of the project is M/S S.M.J International Industries Pvt, Limited. The subject project, being undertaken by M/s S.M.J International Industries Private Limited, will deal with the production of various types of batteries, such as conventional batteries and tubular batteries (lead-acid batteries), under different brand names. The basic raw materials fall into three categories: inorganic lead compounds, sulfuric acid (the electrolyte), and polypropylene (the case material). The battery, which has an area of 02 acres and a planned production capacity of 1.5 lac batteries per month at an estimated cost of 1.5 billion PKR, uses 2% arsenic in the mother alloy used for grid casting. Approx. 6.5 m <sup>3</sup> /hour water is required for the operation of the existing unit. Approx. 5 m <sup>3</sup> /hour wastewater will be generated from the subject unit. Power requirements at the project site is 3500 KVA will be fulfilled by WAPDA. |
| <b>3. Location of project.</b>        | Plot No: 19/1, Phase I and II, Industrial Estate Hattar, Haripur, KPK.   |
| <b>4. Date of filing of EIA.</b>      | 27/05/2024 (Diary No. 235)   |

| Boundary GPS Coordinates |          |          |       |          |          |
|--------------------------|----------|----------|-------|----------|----------|
| S. No                    | Y        | X        | S. No | Y        | X        |
| 1                        | 72.86019 | 33.90219 | 3     | 72.86003 | 33.90126 |
| 2                        | 72.86062 | 33.90235 | 4     | 72.86531 | 33.90111 |



6. In light of visit conducted during public hearing dated 10-04-2025 by the Officers/officials of this Agency, subsequent submission of administrative penalty i.e Rs.500,000/PKR, by the project proponent on 10-07-2025, and after careful review, the Environmental Protection Agency, Government of Khyber Pakhtunkhwa has decided to accord Construction Phase Environmental Approval on the Environmental Impact Assessment (EIA) Report of "**M/S S.M.J INTERNATIONAL INDUSTRIES PVT, LIMITED PLOT NO :19/1, PHASE I & II, INDUSTRIAL ESTATE HATTAR, HARIPUR, KHYBER PAKHTUNKHWA.**" in accordance with the Khyber Pakhtunkhwa Environmental Protection Act, 2014, the Khyber Pakhtunkhwa Environmental Assessment Rules, 2021 and the decision taken under Agenda item No.06 of the 2<sup>nd</sup> Environmental Protection Council (EPC) meeting held on 11/09/2024 followed by Administrative Department Notification No. SO(Env)/CCFE&WD/4-2/2023/EPC/V-III dated 22/01/2025. Furthermore, the proponent shall have to obtain NOCs required from other departments under the prevailing laws/rules of the Provincial Government. This approval shall be governed by the following terms and conditions: -

- a) The proponent shall adopt all precautionary and mitigation measures recommended in the EIA Report as well as replies of the proponent submitted to this Agency and any unanticipated impacts arising during the construction and operation phase of the project.
- b) Effluents and emissions from the unit, including those from generators, shall be kept within the permissible limits of National Environmental Quality Standards (NEQS). The pollution control system must be properly maintained and operational, and if it fails to comply with NEQS, it shall be upgraded or replaced with the latest technology to ensure compliance.
- c) The proponent shall submit quarterly compliance report of the conditions of Environmental Approval along with emissions, effluents and noise analysis reports to EIA Cell from EPA Khyber Pakhtunkhwa certified laboratory.
- d) The proponent must conduct third-party environmental audits every year to assess compliance with environmental standards, and submit reports to the KP- EPA, EIA Cell.
- e) The Wastewater Treatment Plant (WWTP) shall be fully operational with verified capacity to treat peak wastewater load prior to commissioning. A third-party performance verification report from an EPA-certified laboratory must be submitted to KP-EPA confirming compliance with NEQS. In case of any WWTP malfunction, all operations must cease immediately and may resume only after compliance is restored and re-verified by EPA.
- f) Water sprinkling shall be carried out where required to reduce the public nuisance caused by the dust emissions.
- g) The proponent shall establish permanent access to the sampling point for future monitoring and analysis of stack emissions.
- h) Emissions controls measures shall be adopted in case of repair/maintenance of the pollution control system of the unit. Moreover, when the pollution control system is out of order, the unit shall not be operated. Furthermore, proper record of filters shall be maintained.
- i) The treated effluents shall meet NEQS limits for lead, arsenic and other heavy metals and submit quarterly analysis report.
- j) The proponent shall submit quarterly ambient air analysis report from EPA Certified lab in the presence of EPA staff at the unit's boundaries/corners during operation to validate the effectiveness of air pollution control systems such as HEPA filters or baghouses.
- k) Conduct quarterly stack emissions testing from EPA certified lab in the presence of EPA staff to verify whether emission control equipment/system (e.g bag filters, dust collector or wet scrubbers etc) complies with NEQS.
- l) The medical surveillance program shall be implemented as described. Quarterly Blood lead level (BLL) reports for all the employees certified by an approved occupational health clinic must be submitted to this Agency.
- m) The proponent shall ensure on-site showers, PPE laundering and contamination control measures for lead and other heavy metals exposure management.
- n) The proponent shall submit quarterly compliance report from EPA Certified lab confirming the effectiveness of lead dust containment systems in the tube filling areas.
- o) Personal Protective Equipment (PPE) like Masks, Fire Proof Jackets, Gloves, Goggles, Helmets, etc. must be provided to the workers and ensure its usage during the working hours. Furthermore, other health and safety Equipment like first aid box, signboards, etc. shall be installed/maintained inside the Factory premises/workplace as per standard practices /protocols.

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- p) The proponent must provide training for personnel on safety protocols, environmental compliance, proper handling and emergency response procedures related to chemical storage.
- q) Conduct regular health check-ups for workers exposed to the hazardous substances and maintain medical record to comply to health and safety regulations adopted by the KP EPA/other government departments.
- r) The proponent shall implement proper and safe storage measures for all chemicals to ensure compliance with safety and environmental regulations.
- s) All lead plates and lead-bearing materials shall be stored exclusively within a designated, fully enclosed shed. this shed shall feature, impervious flooring with secondary containment barriers to completely eliminate any risk of leaching due to rainfall and to prevent soil contamination.
- t) Batteries must be stored in designated, secure areas with secondary containment to prevent leaks or spills, and the storage areas must be regularly inspected.
- u) Proper confined area shall be allocated to the scrap/raw materials and the final product.
- v) The proponent must establish advanced wastewater treatment system, including ion exchangers and a precipitating mechanism for handling of strong acids and toxic heavy metal.
- w) The proponent must install a pH meter at the outlet of the wastewater treatment plant to monitor effluent quality.
- x) The proponent must conduct lead smelting process in a controlled environment to ensure safety and compliance with all relevant regulations.
- y) The water used in the process shall be re-used/recycled to maximum possible times. The effluent (if any) shall be properly treated before final discharge in compliance of the NEQS.
- z) Water meters shall be installed for keeping in check the sustainable water usage.
- aa) The ground/surface water and soil shall be protected from all kind of pollutions/contaminations.
- bb) The proponent shall sign a contract with a certified vendor for solid waste.
- cc) Sufficient mitigations shall be adopted for the control of noise pollution.
- dd) The proponent shall install an updated fire extinguishing system and implement a fire protection plan as per the standards required by Rescue 1122.
- ee) Proper parking area shall be identified for the vehicles inside the factory premises. Traffic congestion shall be avoided on main access road.
- ff) A comprehensive CSR document, keeping in view quantum of project activities, having activities with proper funds allocation shall be shared with EPA before finalization for approval of EPA.
- gg) Plantation shall be carried out as per the submitted plantation plan with priority to indigenous/local species along with fund allocation for additional plantation on seasonal basis to counter carbon emissions.
- hh) For safe disposal of the residue/byproduct, proper contract shall be signed with the contractor and copy of the same shall be provided to EPA.
- ii) As committed, electricity from WAPDA shall be utilized as the primary source of power.
- jj) Non-technical jobs shall be provided to the locals and preference shall be given to the locals in technical jobs. Moreover, maximum wages shall be paid to the workers as per prevailing Government rules.
- kk) Proper funds shall be allocated in the EMP for environmental improvement & awareness like celebration of environment days, facilitation in environmental monitoring, plantation etc. Activities shall be carried out in this regard in coordination with EPA KP.
- ll) Any future expansion, technological modification, or change in raw material/production line must be communicated to EPA and necessary approvals obtained prior to implementation.
- mm) The proponent shall ensure complete implementation of the Emergency Response Plan (ERP) as described in the EIA report.
- nn) All hazardous waste shall be handled, labeled, stored, and transported in compliance with the Hazardous Substances Rules, and records must be maintained and made available during inspections.
- oo) The proponent shall display environmental approvals, safety instructions, and emergency contact numbers prominently on-site.
- pp) The management shall be bound to adopt any additional mitigation measures suggested by EPA, as and when warranted, based on site inspections, complaints, or monitoring reports, during the construction and operation phases of the project.

7. The proponent shall be liable for correctness and validity of the information provided by the environmental consultant.
8. The proponent shall be liable for compliance of Rule 14, 15, 16, 18, 19 and 20 of the Khyber Pakhtunkhwa Environmental Assessment Rules, 2021 regarding approval, confirmation of compliance, entry, inspections and monitoring.
9. This approval accorded by the Agency under section 13 of the Khyber Pakhtunkhwa Environmental Protection Act, 2014, and shall be valid, for commencement of construction for a period of two years from the date of issuance.
10. This approval is accorded only for the construction phase of the project (Only for the Battery Processing Unit installation/construction). The proponent will obtain separate approval for installation and operation of generators as well as operation of the battery unit in accordance with Khyber Pakhtunkhwa Environmental Assessment Rules, 2021.
11. Any change in the approved project design shall be communicated to EPA, Khyber Pakhtunkhwa and shall be commenced after obtaining the approval.
12. This approval shall be treated as null and void, if all or any of the conditions mentioned above is/are not complied with:
13. This approval does not absolve the proponent of the duty to obtain any other approval or clearance that may be required under any law in force.
14. There shall be no legal case pending in the courts against the project.
15. In exercise of the power under Section 13 of the Khyber Pakhtunkhwa Environmental Protection Act, 2014, the undersigned is pleased to approve the EIA Report of "M/S S.M.J INTERNATIONAL INDUSTRIES PVT, LIMITED PLOT NO :19/1, PHASE I & II, INDUSTRIAL ESTATE HATTAR, HARIPUR, KHYBER PAKHTUNKHWA." only with above terms and conditions mentioned.

Dated: Peshawar 28 - 08 - 2025

Tracking/File. No. No. EPA/EIA/Battery/SMJ/Hattar/Haripur/25/ 7305 - 08

QR Code:



<https://epakp.gov.pk/environmental-approvals/>

  
DEPUTY DIRECTOR (MEAS),  
EPA, KHYBER PAKHTUNKHWA,  
3RD FLOOR, S.D.U. BUILDING,  
KHYBER ROAD, PESHAWAR  
CANTT.