



ENVIRONMENTAL PROTECTION AGENCY
REGIONAL OFFICE SWAT
Climate Change, Forestry, Environment & Wildlife Department
Govt. of Khyber Pakhtunkhwa



No. EPA/ROS/1970-72 Dated. 11/08/2025

To

Mr. Shujat Khan (CEO)
Zong CM Pak (Pvt) Limited.
Plot No. 47 National Park road
Chak Shahzad Islamabad.

Subject: DECISION ON GENERAL ENVIRONMENTAL ASSESSMENT (GEA) REPORT/CHECKLIST FOR ENVIRONMENTAL APPROVAL FOR BTS TOWER AT SITE ID 52763

Reference to your letter No. CMPAK/ZONG/North-010295 dated 27-05-2024 and this office diary No. 4717 dated 10-06-2024, on the subject cited above and to enclose herewith Environmental Approval on "General Environmental Assessment (GEA) Report/ Checklist of Site ID **52763** located at mohalla Khatky Batkhela tehsil Batkhela District Malakand, 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 GEA report, please.

Director (Malakand)

Copy for information to:

1. The GIS Specialist. EPA Govt. of Khyber Pakhtunkhwa.
2. PA to Director General, Environmental Protection Agency, Govt. of Khyber Pakhtunkhwa.

SCHEDULE-IX
Decision on GEA

- 1. Name & address of proponent:** Mr. Shujat Khan (CEO) Zong CM Pak (Pvt) Limited.
Plot No. 47 National Park road Chak Shahzad Islamabad.
- 2. Description of project:** The project for which General Environmental Assessment (GEA) conducted is "M/S Zong CMPak Limited BTS Tower site ID 52763 located at Mohalla Khatky Batkhela tehsil Batkheal District Malakand". The BTS tower having a height of 45 meter is already installed on the above mentioned site.
- 3. Location of project:** The project site is located Mohalla Khatky Batkhela tehsil Batkheal District Malakand.
- 4. GPS Coordinates/GIS Map:**
- | S.No. | Latitude | Longitude |
|-------|-----------|-----------|
| 1 | 34.610918 | 71.971357 |
- 5. Date of filing of GEA:** *Af* 10/06/2024 (Ref: EPA/Diary No. 4717)
EPA Regional Office Swat.
- 6. After careful review, the Environmental Protection Agency, regional office Swat, Govt. of Khyber Pakhtunkhwa has decided to accord approval of the GEA Report/Check list of "M/S Zong CMPak Limited BTS Tower site ID 52763 located at Mohalla Khatky Batkhela tehsil Batkheal District Malakand", in line with the GEA Guidelines for BTS towers 2025, Notification No.SO/ENVT/CCFE&WD/4-2/ECP-2025 dated 23/06/2025, according to Khyber Pakhtunkhwa (KP) Environmental Protection Act, 2014 and Khyber Pakhtunkhwa Environmental Assessment Rules,2021, subject to the following terms and conditions:**
- The proponent shall adopt all precautionary & mitigation measures recommended in the submitted GEA report/Check list/ NEQS/ KP-EQS and any un-anticipated impact.
 - The proponent shall have to follow all the conditions mentioned in the Khyber Pakhtunkhwa Environmental Protection Act, 2014 and Khyber Pakhtunkhwa Environmental Assessment rules 2021, and the approved guidelines for BTS sector (2025).
 - The proponent shall adopt all precautionary and mitigation measures recommended in the GEA Report and any un-anticipated impacts arising during the operation phase of the project.
 - The proponent shall be liable to comply with any decision made by the Competent Forum, regarding the imposition of Administrative Penalty in violation of Section-13 of Khyber Pakhtunkhwa Environmental Protection Act, 2014 under the KP-EPA Administrative Penalty Rules, 2017.
 - That the proponent is bound to implement and comply with any measures/directives as and when suggested by the Agency. That if any of the negative impacts reported from the tower as a result of new research or finding if found, even if the proponent comply the distances mentioned in the guidelines, the Agency reserves the right to cancel/withdraw the approval till mitigation of negative impacts.
 - In case of uncontrolled public exposure, for installation of BTS towers, the minimum safe distance is a radius of **25 feet** from the **radiating surface of**

antenna. In case where the Radio Frequency Radiation at a site exceeds the National Standard for general public/uncontrolled exposures, the site shall be posted with appropriate signs of warning and power down/shutdown the transmitters in the areas/remove the BTS Tower from the site.

- g) In case of controlled (occupational) exposure, the minimum distance between the workers and the antenna must be **10 feet**.
- h) The proponent shall not operate BTS tower within the radius of 100 meters (radiating surface of antenna) from the hospitals and educational institutes (e.g schools, colleges & madrassa etc).
- i) The design of the BTS Tower must be compatible with adjacent land uses and if results in damage to the aesthetics of the surrounding area, the same shall be restored and rehabilitated by the proponent.
- j) All operators/proponents shall develop a work practice manual to be displayed on the antenna sites for information.
- k) The proponent shall ensure to comply with all the instructions/directions of **"Protection from Health Related Effects of Radio Base Station Antennas Regulations, 2008"**.
- l) The proponent/operator shall submit to this Agency, a copy of the "Compliance Certificate" along-with supporting information submitted to PTA in accordance to Regulations 4 to 6 of **"Protection from Health Related Effects of Radio Base Station Antennas Regulations,2008"** (*For recording of Power Density, the field staff may be equipped with Digital Portable Meter).
- m) The BTS tower shall not be allowed to be operated on residential building in earthquake Red zone areas as per seismic zone maps of "Building code of Pakistan."
- n) In case the BTS tower is shared, the sharing shall be among 03 No. of service providers only. Moreover, in such a case the height of the BTS tower shall be increased. Prior approval for each antenna shall be obtained.
- o) Antenna Installation information shall be displayed in accordance with the notified GEA Guidelines for BTS Towers 2025.
- p) The BTS tower shall be installed on such a location that distance between two or more BTS towers shall not be less than 50 meters. 
- q) Roof mounted antennas shall be elevated at least twenty five feet (25 ft.) above the height of people who may have to be on the roof top and the radiating surface shall be kept at the same distance from the public places, including roof access points, telephone service points etc.
- r) Lightning conductor shall be installed to avoid any eventuality due to thunderstorm.
- s) The proponent shall ensure the compliance and implementation of the National Environmental Quality Standards (NEQS) for Air, Noise, Water and Soil during operational phase of the project.
- t) In case generator/GENSET is required to be installed, it shall comply with the NEQS limits of emissions and noise pollution. Special mitigation measures to be adopted for vibration and noise control by fully covering the generator in a sound proof room, installing a silencer and rubber padding.
- u) The safe limit of power density values as specified/authorized/approved by the Frequency Allocation Board (FAB) and/or Pakistan Telecommunication Authority (PTA) at public level in tower's proximity must be ensured to be maintained.
- v) The proponent shall be liable to adopt all the applicable conditions mentioned in the GEA Guidelines for BTS Towers 2025, in true letter and spirit.
- w) The proponent shall be liable to address any complaint/issue highlighted against the BTS tower.

- x) No extension/alteration would be permitted in the future in the existing project without prior approval of the EPA/Govt. of Khyber Pakhtunkhwa.
- y) The proponent shall be bound to provide any additional information/document as and when required by the Agency.
- z) The proponent is bound to comply with any decisions/recommendations made by the Agency in future regarding the BTS towers. Moreover, the monitoring team of EPA will visit the project site to check the term and condition of the approval and compliance of the Khyber Pakhtunkhwa Environmental Protection Act, 2014. Furthermore, the management shall facilitate the EPA Monitoring team at the time of monitoring.
7. The proponent shall be liable for compliance of Rules 14, 15, 18, 19, 20 & 21 of the Khyber Pakhtunkhwa Environmental Assessment Rules, 2021 regarding conditions of approval, confirmation of compliance, validity period of Approval, entry, inspections & monitoring.
8. The proponent shall be liable for correctness and validity of the information provided in the GEA report.
9. The proponent shall obtain renewal of the Environmental approval every 03 years under Rule-15(4) of Khyber Pakhtunkhwa Environmental Assessment Rules, 2021.
10. Any change in the approved project shall be communicated to EPA, Khyber Pakhtunkhwa and shall be commenced after obtaining the approval.
11. There shall be no legal case pending in any court against the project.
12. 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. The proponent shall have to obtain NOCs required from other departments/authorities under the prevailing laws/rules of the provincial government and must ensure valid lease agreements before operation of the project to ensure compliance of relevant provisions of KPEPA, Act 2014, Environment Assessment rules 2021 and GEA Guidelines for BTS towers, 2025 for the BTS unit.
13. The proponent/Consultant would be bound to submit the **affidavit** to this Agency for addressing all codal formalities for BTS.
14. In case of non-compliance on the part of the proponent/Consultant to any condition mentioned in the environmental approval or in case of any violation of the conditions of the GEA guidelines 2025 for BTS, and in case of any land dispute this Approval must be considered as *null and void (Rule 21 of Environmental Assessment rules 2021)*.
15. In exercise of the power under Section 13 of the Khyber Pakhtunkhwa Environmental Protection Act, 2014, the undersigned is pleased to approve the GEA Report/Check list of the aforementioned project with the above mentioned terms and conditions.

Dated: Swat 11-08-2025

Tracking/ File.No. EPA/ROS/GEA/BTS/ 1970-72

Tracking Code:



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

DIRECTOR (Mkd)
EPA, Regional office Swat