

ON APPROVALS & CLEARANCES OF INITIAL ENVIRONMENTAL EXAMINATION / ENVIRONMENTAL IMPACT ASSESSMENT AND POST CLEARANCE MONITORING DURING LAST

PERFORMANCE AUDIT REPORT

THREE YEARS BY THE
PAKISTAN ENVIRONMENTAL PROTECTION
AGENCY (PAK-EPA)

AUDIT YEAR 2021-22

AUDITOR GENERAL OF PAKISTAN

PREFACE

The Auditor General of Pakistan conducts audit under Articles 169 and 170 of the Constitution of the Islamic Republic of Pakistan 1973, read with Sections 8 to 12 of the Auditor-General's (Functions, Powers and Terms and Conditions of Service) Ordinance 2001. Performance audit of "Approvals & clearances of IEEs / EIAs and post clearance monitoring during last three years by the Pakistan Environmental Protection Agency" was conducted accordingly. The Performance Audit was conducted with an environmental perspective in accordance with relevant guidelines issued by the Department of the Auditor General of Pakistan and the International Standards of Supreme Audit Institutions (ISSAIs).

The Directorate General Audit (CC&E) conducted Performance Audit of Pak-EPA for a period of three years starting from 1st July, 2018 to 30th June, 2021 during the Audit Year 2021-22 with a view to report significant findings to the relevant stakeholders. Audit examined the efficiency and effectiveness aspects of the approvals & clearances of IEEs / EIAs and post clearance monitoring by Pak-EPA. In addition, Audit also assessed on test check basis whether the management complied with applicable laws, rules and regulations. Audit Report presents a comparative analysis of performance of Pakistan Environmental Protection Agency (Pak-EPA) at Federal level and the Environmental Protection Agencies (EPAs) in all four provinces. It also highlights systemic issues and shortcomings which have been included in the report in the shape of audit observations. The Audit Report also includes specific actions and recommendations that, if implemented, will help the management and policy makers to achieve the objectives of environmental protection in an effective manner. The results and findings of this report will be useful for devising appropriate policies and action plans by the relevant stakeholders.

The findings were reported to the PAO for convening DAC meeting. However, no DAC meeting was convened till finalization of report. Last reminder was issued on 31.05.2022.

The Audit Report is submitted to the President of Pakistan in pursuance of the Article 171 of the Constitution of the Islamic Republic of Pakistan 1973, for causing it to be laid before both houses of Parliament and the National Assembly.

Islamabad Dated: 01 Sep, 2022 -Sd/-(Muhammad Ajmal Gondal) Auditor General of Pakistan

Table of Contents

ABBR	EVIATIONS AND ACRONYMS	i
EXEC	UTIVE SUMMARY	iii
1.	Introduction	1
2.	Audit Objectives	3
3.	Audit Scope and Methodology	3
4.	Comparative Analysis of Federal and All Provincial EPAs	4
5.	Audit Findings and Recommendations	13
6.	Overall Assessment	34
7.	Conclusion	36
Ackno	wledgement	37
ANNE	EXURES	38

ABBREVIATIONS AND ACRONYMS

AGP Auditor General of Pakistan BTS Base Transceiver Station

CC&E Climate Change & Environment
CGA Controller General of Accounts
CSR Corporate Social Responsibility
DAC Departmental Accounts Committee

DAGP Department of the Auditor General of Pakistan

DDMA District Disaster Management Authority

DDO Drawing & Disbursing Officer

DG Director General

DLIs Disbursement Linked Indicators

EAAC Environment Assessment Advisory Committee

EIA Environmental Impact Assessment EMC **Environment Monitoring Cell EMP** Environmental Management Plan **EMT Environmental Monitoring Team EPA Environmental Protection Agency EPD Environment Protection Department EPI Environment Performance Index** EPO **Environmental Protection Order**

FAM Financial Audit Manual

FY Financial Year HQs Headquarters HR Human Resource

ICT Islamabad Capital Territory

IEE Initial Environmental Examination

ISSAIs International Standards of Supreme Audit Institutions INTOSAI International Organization of Supreme Audit Institutions

NDMA National Disaster Management Authority

NEC National Environmental Council

NEQS National Environmental Quality Standards

NOC No Objection Certificate
PAM Performance Audit Manual

PDMA Provincial Disaster Management Authority PEPC Pakistan Environmental Protection Council

SDGs Sustainable Development Goals SOPs Standard Operating Procedures

EXECUTIVE SUMMARY

The Directorate General Audit (Climate Change & Environment), is mandated to conduct statutory audit of Disaster Management and Environment related organizations at federal, provincial and district level. The Directorate General mainly conducts Compliance Audit, Certification Audit, Performance Audit and audits with an environmental perspective of a number of organizations including ERRA, NDMA, PDMAs, DDMAs, Environmental Protection Agencies, Civil Defence and Rescue 1122 establishments.

To conduct the performance audit, a well-thought-out and comprehensive audit methodology was evolved to cover the assignment properly. The overall objective of the performance audit was to examine and evaluate the process undertaken with respect to filing of Initial Environmental Examination (IEE) and Environmental Impact Assessment (EIA), grant of environmental approval thereof by EPA and monitoring mechanism by the EPA.

As a result of audit, a number of issues have been highlighted in the audit report. Relatively less significant issues are listed as MFDAC in **Annexure-I.** The key audit findings are as under:-

- i. Non-preparation / publication of Annual National Environment Report by Pak-EPA
- ii. Non-existence of post-environmental approvals monitoring
- iii. Convening of public hearings in violation of rule
- iv. Non-framing of IEE/EIA review, sector specific and public consultation guidelines
- v. Non-existence of post-environmental approvals monitoring
- vi. Construction in environmental sensitive areas without environmental approvals

Based on the audit findings, it is imperative that the agency should make an effort to consider and improve upon the areas highlighted in the report and implement the recommendations in true spirit.

Audit recommendations are as under:

- i. Annual Environment Reports should be prepared and published each year in order to reflect the performance of the Agency towards betterment of Environment.
- ii. Mechanism should be devised by the EPA to improve the performance of EMTs and fast-track the processing and approval of IEEs/ EIAs.
- iii. Public hearings should be convened according to rules after 30 days from the date of publication so that all stakeholders are able to participate and give feedback and input.
- iv. EPA should properly frame IEE/EIA review guidelines, sector specific guidelines and public participation guidelines for review of environmental reports and grant of environmental approvals.
- v. EPA should take concrete steps to devise a comprehensive monitoring mechanism for checking compliance of the conditions of environmental approvals granted to the proponents.
- vi. EPA should take steps to trace all such activities and projects being carried out without environmental approval by issuing Environment Protection Orders and imposing penalties as per rules.

1. INTRODUCTION

The Pakistan Environmental Protection Act was introduced in the country in 1997 which provides for enforcement of quality standards, regulatory regime for hazardous substances and introduction of EIA/IEE review procedures and monitoring. The Federal EPA was established in Islamabad in pursuance of the EPA Act 1997. The Act provided for establishment of provincial EPA in all provinces. Over a period of time, the Environmental Protection Agencies (EPAs) were established at the federal level and all four provinces and they act as lead agencies to protect, conserve and improve environment in the country.

One of the important functions of Pak-EPA is to review the IEE/EIA reports of the project, conduct public hearing in EIA cases, issue environmental approvals, monitor the conditions of environmental approvals and initiate required actions against the proponents in case of non-compliance of the conditions of the environmental approvals.

The Pakistan Environmental Protection Act 1997 requires that no proponent of a project shall commence construction and operation unless he has filed with the Pak-EPA an Initial Environmental Examination (IEE) or where the project is likely to cause an adverse environmental effect, an Environmental Impact Assessment (EIA), and has obtained from the Pak-EPA, environmental approval thereof. Upon submission of EIA, the Pak-EPA is required to review the assessment and accord its approval subject to such conditions as it may deem fit to impose. The Pak-EPA may require the project proposal to be resubmitted after such modifications as it may consider appropriate, or reject the project as being contrary to environmental objectives. Every review of an EIA is carried out with public participation and the Agency communicates the approval or otherwise within a specified period from the date of filing of EIA by a proponent.

The Pak-EPA at federal level notified Pakistan Environmental Protection Agency's Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000. These regulations are followed by proponents for preparation and review of IEE/EIA and for grant of environmental approvals.

As per Review of Initial Environmental Examination and Environmental Impact Assessment Regulations 2000, the proponent of a project who wants to commence construction and operation, applies to the Pak-EPA for obtaining environmental approval. The proponent files with Pak-EPA an application along with an Initial Environmental Examination (IEE) or where the project is likely to cause an adverse environmental effect, an Environmental Impact Assessment (EIA). The Pak-EPA makes an initial review and may demand any additional information/ documents within 10 days of the application for thorough review. During review process, Pak-EPA obtains the opinions/recommendations/suggestions from the committee of experts and advisory committee. Pak-EPA is bound to complete its review process and communicate its decision to the proponent within four months.

The performance audit was planned to examine and assess the IEE/EIA approvals granted in last three years by the Pak-EPA in terms of efficiency of the Agency and effectiveness of the evaluations and post monitoring activities of the Pak-EPA.

Goal 11 of Sustainable Development Goals (SDGs) calls for making cities and human settlements inclusive, safe, resilient and sustainable. More specifically, Target 11.6 provides to reduce the adverse per capita environmental impact of cities by paying special attention to air quality and municipal and other waste management. Similarly, Target 9.4 provides to upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes. The National Prioritized Goals/SDGs, as per SDGs Framework of Pakistan 2018, contain goal 9 and 11 of UN SDGs. Thus, the audit topic is not only directly linked to UN SDGs but also to national prioritized goals of Pakistan.

2. AUDIT OBJECTIVES

The overall objectives of the performance audit was to examine and evaluate the process undertaken with respect to filing of Initial Environmental Examination (IEE) and Environmental Impact Assessment (EIA), grant of environmental approval thereof by EPA and monitoring mechanism by the EPA.

The objectives of the performance audit were as under:

- To examine the performance of Pak-EPA with a view to assess the efficiency and effectiveness of the approvals.
- To examine that IEE/EIA Regulations have been framed and the process of grant of IEE/EIA is in compliance with the laid down regulations.
- To ascertain the number of IEEs and EIAs approved in last three years and a comparison of all EPAs thereof.
- To examine that the Environment Impact Assessment Approvals were issued to the applicants within the specified time.
- To assess whether post assessments were being carried out to ensure that the approved projects were operating in accordance with approved EIA.
- To examine that the projects for which EIAs were not issued by respective EPAs were being executed and operated without EIAs and the actions initiated by the Agency.
- To draw a comparative analysis of the performance of all EPAs.
- To assess that the EPD and EPA have aligned their policies / plans and allocated required resources in line with the National Framework of SDGs 2018 and had submitted periodical progress and monitoring reports to the NEC.

3. AUDIT SCOPE AND METHODOLOGY

The scope of audit included examining the activities carried out by EPA to grant environmental approvals. The audit covers a period of three years from 1st July, 2018 to 30th June, 2021.

Audit team used desk audit techniques, which included examining permanent files, and other relevant documents, related policies and rules followed by the audited entities. Similarly, Audit and Inspection Report (AIR) of past three (03) years were also examined to identify the important risk areas. Desk audit review helped auditors in understanding the systems, procedures, internal controls and overall environment of the audited entities and identification of high-risk areas for further scrutiny.

Evidence was primarily gathered by applying procedures like inquiries from the management; review of policy documents and reports; comparison of policies and action plans with actual implementation; interpretation and analysis of primary/secondary data. Data was also collected through observation and structured/unstructured interviews of the relevant officials.

The performance audit was conducted in accordance with the guidelines contained in the Financial Audit Manual (FAM) and Performance Audit Manual (PAM) of DAGP which are in line with the International Standards of Supreme Audit Institutions (ISSAIs).

4. COMPARATIVE ANALYSIS OF FEDERAL AND ALL PROVINCIAL EPAs

Performance audit of "Approvals & clearances of IEEs / EIAs and post clearance monitoring during last three years by the environmental protection agencies" was conducted at Federal and each province level. Hence, data of Federal, Punjab, Balochistan, KP and Sindh EPAs was gathered and analyzed.

A comparative analysis of the Federal and each of the province is mentioned below:

A. Comparison of enactment/ implementation status of acts, rules, regulations and SOPs

Audit drew a comparison of the law, rules, regulations, guidelines and SOPs governing environmental approvals in all five EPAs. The results are tabulated below:

Sr.	Sr. Description		Status						
No.			Punjab	Balochistan	KP	Sindh			
1.	Enactment of an Environmental	Yes	Yes	Yes	Yes	Yes			
	Protection Act								
2.	IEE/EIA Regulations	Yes	No	No	Yes	Yes			

Sr.				Status		
No.	Description	Federal	Punjab	Balochistan	KP	Sindh
3.	Proper adoption of Federal IEE/EIA regulations through notification	N/A	No	No	NA	N/A
4	Guidelines for the Preparation and Review of Environmental Reports in line with IEE/EIA	Yes	No	No	No	No
5.	regulations ¹ Sectoral Guidelines for the Preparation and Review of Environmental Reports in line with IEE/EIA regulations ²	Yes	No	No	No	No
6.	Minimum mandatory requirement of the documents to be submitted along with application	Yes	No	No	Yes	No
7.	Guidelines indicating the basic techniques and measures to be adopted to ensure effective public consultation, involvement and participation in EIA assessment ³	Yes	No	No	No	No
8.	Framing of rules/regulations to cover the units which were established and operationalized before promulgation of the Act	No	No	No	No	No
9.	Notifying of environmentally sensitive areas in the jurisdiction	No	Yes	No	No	No
10.	Constitution of Environmental Assessment Advisory Committee ⁴	No	Yes	No	Yes	Yes
11.	Preparation of Regulations/SOPs and Guidelines for post approval monitoring of industrial and commercial concerns	No	No	No	No	No
12.	Validity period of	3 years	3 years	3 years	2years	3 years

¹ As per guidelines notified by Pak-EPA ² Federal guidelines notified by Pak-EPA ³ Federal guidelines notified by Pak-EPA ⁴ IEE/EIA review regulations 2000

Sr.				Status		
No.	Description	Federal	Punjab	Balochistan	KP	Sindh
	NOCs/approvals ⁵					
13.	Regulations, SOPs, guidelines and mechanism for registration and systemic and continuous monitoring of environmental consultants	No	No	No	No	No
14.	Mandatory time for public participation/ hearing ⁶	30 days	30 days	30 days	30 days	30 days
15.	Before commencement of construction, the proponent shall acknowledge the conditions by way of undertaking	Yes	Yes	Yes	Yes	Yes
16.	Establishment of Environmental Protection Tribunals ⁷	Yes	Yes	Yes	Yes	Yes
17.	Whether the private labs were registered with EPA?	Yes	Yes	No private lab exists	Yes	Yes
18.	Necessary policy/ standards/ rules/ regulations are made to align, the actions taken as a result, with SDGs		No	No	No	No
19.	Penalty Rules 8	Yes 2015	No	No	Yes 2017	Yes 2014

The above data reveals that Environmental Protection Acts have been enacted at Federal and Provincial levels. IEE/EIA review regulations have also been framed in Federal, Sindh and KPK EPAs. However, Punjab and Balochistan are still following Federal notified IEE/EIA Regulations, however formal notification for adoption of the same have not been issued by the respective EPAs. Similarly, IEE/EIA preparation and review guidelines, sector specific guidelines and public consultation guidelines were only framed by Pak-EPA at federal level and the provinces neither adopted federal guidelines nor prepared their own guidelines.

The Federal act was promulgated in 1997 and thereafter provincial acts were also promulgated. However, there is no legal framework available to

⁵ IEE/EIA review regulations

⁶ As per IEE/EIA review regulations

⁷ Environmental Protection Acts of the relevant provinces

⁸ Environmental Protection Acts of the relevant provinces

deal with industrial and commercial concerns which were established before 1997. The Federal and Punjab EPAs notified environmentally sensitive areas in their jurisdictions in line with Regulations, whereas remaining provincial EPAs did not notify environmentally sensitive areas. Further, none of the EPAs have framed the Regulations/SOPs and Guidelines for post approval monitoring of industrial and commercial concerns.

Penalty rules are mandatory to guard against violation of environmental protection laws. However, penal rules have not been framed so far, except by Pak-EPA at federal level and Khyber Pakhtunkhwa and Sindh EPAs at provincial level.

Moreover, Federal, Punjab and Balochistan EPAs are following IEE/EIA review Regulations which were framed in late 2000, but the same have not been updated subsequently to cater for the latest developments and requirements.

B. Total Environmental approvals issued by EPAs in last three years w.e.f. 1st July, 2018 to 30th June, 2021

EPAs all over Pakistan granted a total of 1,919 environmental approvals during the period starting from 1st July, 2018 to 30th June, 2021. The detail is tabulated below:

Sr. No.	Category		Grant of Environmental Approvals by EPAs From 1 st July, 2018 to 30 th June, 2021						
110.		Federal							
1.	EIA	29	102	20	53	154	358		
2.	IEE	06	797	408	121	198	1530		
3.	EMP	05	0	26	0	0	31		
	Total	40	899	454	174	352	1,919		

The above table indicates that EPA Punjab issued the highest number of environmental approvals in last three (03) years followed by EPA Balochistan.

The data also reveals that Initial Environmental Examination (IEE) is being used as a major tool for issuing environmental approvals and the emphasis on granting approval through the instrument of Environmental Impact Assessment (EIA) is on a lower side. This implies that majority of the environmental approvals were issued without assessing the causes which may

result in adverse environmental effect and thus no remedial measures and suggestions on this account were part of the environmental approvals. This issue is required to be addressed by the EPAs and the decision to go for IEE or EIA approval has to be taken carefully in the light of a pre-determined criteria.

Pak-EPA at federal level has granted only 40 IEE/EIAs during last three years. This figure does not appear to be commensurate with the increased commercial and industrial projects being undertaken in the capital city. This implies that most of the projects have been undertaken without submission of IEE/EIA by the proponents and no environmental approvals were issued by EPA due to lack of proper monitoring to track and trace down those projects and bring them under the net of the Agency for granting environmental approvals as per law and regulations.

Similarly, if taken as a whole, the Environmental Protection Agencies in the country have issued a total of 1,919 environmental approvals in last three years i.e. during 2018 to 2021. This poses a question mark on the overall performance of the Agencies and the role performed in fulfilling their mandate which further implies that the majority of the projects and activities in the country were undertaken without the involvement and assessment of EPAs and the respective governments and the EPAs have to look into the matter and take concrete steps to perform functions as conceived in the guiding legislation on environmental protection and perform an effective role in protecting the country from environmental degradation.

C. Industry-wise Environmental approvals granted by Federal and Provincial EPAs

Industries/commercial concerns-wise environmental approvals granted by all EPAs during July, 2018 to June, 2021 is depicted below:

Sr. No. Type of Industry Grant of Environmental Approvemental Special Structure of Special Sp						June, 2021			
110.		Federal	Punjab	Balochistan	KP	Sindh			
1.	Cement factories	0	25	0	8	0	33		
2.	Commercial buildings	6	11	0	0	0	17		
3.	Food sector industries	0	14	0	5	0	19		
4.	Garments	0	12	0	0	0	12		
5.	Housing schemes	6	222	0	13	0	241		

Sr.	Type of Industry			nmental Appr , 2018 to 30 th			Total
No.		Federal	Punjab	Balochistan	KP	Sindh	
6.	LPG storage facility	0	49	0	0	0	49
7.	Mining and minerals	0	87	0	0	0	87
8.	Sand excavation	0	137	0	0	0	137
9.	Oil and gas projects	0	31	22	30	57	140
10.	Oil storage	0	11	0	0	0	11
11.	Plastic industries /PVC pipe	0	10	28	5	0	43
12.	Poultry feed mills/Poultry shed	0	20	28	10	0	58
13.	Rice mills	0	14	0	0	0	14
14.	Scrap segregation	0	12	0	0	0	12
15.	Solar power plants	0	23	10	0	0	33
16.	Stone crushers	0	11	11	0	0	22
17.	Textile sector	0	14	0	0	0	14
18.	Urban development	4	13	0	11	133	161
19.	Warehouse and godown	0	24	0	0	0	24
20.	BTS towers	1	0	24	0	0	25
21.	Marble factory	0	0	11	0	0	11
22.	Ship breaking	0	0	241	0	0	241
23.	Steel rerolling mill	2	0	12	14	0	28
24.	Waste transportation	0	0	11	1	0	12
25.	Agriculture, Livestock and Fisheries	0	0	0	0	6	6
26.	Energy/Power Plants	1	0	0	27	27	55
27.	Manufacturing and processing	0	0	0	0	103	103
28.	Waste Disposal and treatment/ S.T.P	0	0	0	1	3	4
29	Water management, dams, irrigation and flood protection	0	0	0	2	7	9
30.	Transport	0	0	0	0	5	5
31.	Hospital	4	0	0	3	0	7
32.	University	4	0	0	0	0	4
33.	Apartments	6	0	0	0	0	6
34.	Research Centre	1	0	0	1	0	2
35.	Asphalt Plant	1	0	0	1	0	2
36.	Public Building	1	0	0	0	0	1

Sr. No.	Type of Industry		Grant of Environmental Approvals by EPAs From 1 st July, 2018 to 30 th June, 2021					
110.		Federal	Punjab	Balochistan	KP	Sindh		
37.	Floor Mil	0	0	0	1	0	1	
38.	Petrol Pumps	0	0	0	12	0	12	
39.	Paper Industry	0	0	0	2	0	2	
40.	Pharmaceutical industry	0	0	0	1	0	1	
41.	Other Projects	3	0	0	26	11	40	
	Total	40	899	454	174	352	1,919	

The above table shows that during last three years, major area of environment approvals pertained to housing schemes, where 241 approvals were granted as a whole, out of which 222 approvals were granted by EPA – Punjab alone. Similarly, 137 sand mining and 87 other mining units were granted environmental approvals by EPA Punjab. Further, 23 solar power plants, 37 cement factories, 26 textile/garments factories, 14 rice mills and 12 steel re-rolling mills were also granted environmental approvals by EPA Punjab. In Pak-EPA (Federal), the sectors having higher number of approvals include apartments, housing schemes, commercial buildings, hospitals, universities etc.

In EPA Balochistan, major share of environmental approvals was related to ship breaking business i.e. 241 units/projects were cleared environmentally. Further, 22 oil and gas projects and 28 poultry feed mills and 24 BTS towers work were granted environmental approvals.

In EPA KP, the majority of environmental approvals pertained to development of housing schemes, oil/gas projects and energy/power plants. In EPA Sindh, major areas of environmental approvals related to housing schemes, oil/gas projects, manufacturing and processing units and energy/power plants.

The comparative data reveals that some of the sensitive areas like transport and hospitals, which may have a major role in environmental degradation, have received lowest number of environmental approvals by the EPAs in last three years. The policy makers at federal and provincial levels and EPAs at operational level need to look into this area and come up with a comprehensive strategy to focus on environmentally sensitive sectors in the

country for increased environmental assessments, clearance and regular monitoring.

D. Fee structure for review of IEE/EIA and grant of Environmental approvals

A comparison of review fees structure for granting of IEE/EIA is depicted in the table below:

S	Description	Review fees (Rs.)							
	_	Federal	Punjab	Balochista	KP	Sindh			
#		(As per	(As per	n	(As per KP	(As			
		Federal	Federal	(As per	Regulation	Review			
		/Regulation	Regulation	Act 2014)	s 2022)	Regulation			
		s 2000)	s 2000)			s 2021)			
1.	EIA	30,000	30,000	100,000	500,000	Up to 20			
						million, Rs.			
						50,000.			
						Above 20			
						to 100			
						million, Rs.			
						100,000.			
						Above 100			
						to 200			
						million, Rs.			
						200,000.			
						Above 200			
						up to 500,			
						million Rs.			
						400,000.			
						Above 500			
						million Rs.			
2.	IEE	15,000	15,000	50,000	250,000	600,000. As above			
3.	EMP	13,000	13,000	25,000	230,000	40,000			
4.	Environmenta	-	=	23,000	=	40,000			
4.	l Checklist	-	-	-	-	40,000			
5.	BTS Towers	_	_		_	20,000			
6.	GEA				50,000	20,000			
υ.	ULA	-	-	-	30,000	-			

The fee structure tabulated above indicates that EPA Sindh has revised its fee structure in 2021 by linking the fee structure with the value of the project and has thus properly rationalized the fee structure thereby adding to the government revenues. EPA Punjab is collecting review fees as fixed by the Federal EPA in 2000, without any subsequent increase/revision. EPA Balochistan is collecting fees as per BEP Act 2014 which has not been revised

thereafter. The rest of EPAs are also required to revise their fee structures accordingly so as to increase government revenues.

E. Staff position in EPAs

The staff position in federal and provincial EPAs is tabulated below:

Description	EPA Federal	EPA Punjab	EPA Balochistan	EPA KP	EPA Sindh				
EPA HQs									
Sanctioned Strength	64	215	209	100	340				
Working strength	47	133	101	58	89				
Shortage	17	82	108	42	251				
Regional Offices									
Sanctioned Strength	NA	NA	NA	31	316				
Working strength	NA	NA	NA	23	105				
Shortage	NA	NA	NA	08	211				
District Offices									
Sanctioned Strength	NA	757	424	NA	342				
Working strength	NA	546	208	NA	0				
Shortage	NA	211	216	NA	342				

The above table shows that federal and provincial EPAs are facing shortage of staff, especially in IEE/EIA review sections and field monitoring to check the physical status of the proponents' sites.

5. AUDIT FINDINGS AND RECOMMENDATIONS

5.1 Non-preparation / publication of Annual National Environment Report by Pak-EPA

According to Section 6(1)(d) of PEPA Act 1997, the Federal Agency shall prepare and publish an Annual National Environment Report on the state of the environment.

Pakistan Environmental Protection Agency (PEPA) only published its Annual National Environment Report on the state of the environment in 2005 and 2016.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that Pakistan Environmental Protection Agency (PEPA) did not prepare and publish annual National Environment Report after 2016 on the state of Environment in the areas under jurisdiction.

Audit is of the view that due to non-preparation and non-publication of Annual National Environment Report on the state of the environment, the performance of Federal EPA could not be ascertained.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that due to limited resources, EPA was not in a position to publish the report on the state of the Environment. The scientific data compilation, material collection and record keeping for the next state of the Environment report are in process.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that annual National Environment Report should be prepared and published in order to reflect the performance of EPA Federal towards betterment of Environment under intimation to audit.

5.2 Construction in environmental sensitive areas without environmental approvals

According to Rule 22 of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000:

- (1) The Federal Agency may, by notification in the official Gazette, designate an area to be an environmentally sensitive area.
- (2) Notwithstanding anything contained in Regulations 3, 4 and 5, the proponent of a project situated in an environmentally sensitive area shall be required to file an EIA with the Federal Agency.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that a number of housing projects are operational in Zone-IV of Islamabad and commercial high rises constructed in the environmental sensitive areas / green belts (new blue area) without obtaining any environmental approvals from the Pakistan Environmental Protection Agency (PEPA). Further, encroachment was also observed on the new blue area (service road).

Audit is of the view that this state implies not only weak implementation / monitoring but also lack of awareness at public level.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that vide para 22 of regulation in observation pertains not in list to EAAC, however, the pointed out issue is covered under regulation 21 of the Review of IEE/EIA Regulations, 2000. A copy of duly notified environmentally sensitive areas had already been provided to the Audit Team with specific reference to the development of new blue area.

The reply of management is not satisfactory as the pointed out issue is related to projects executed without environmental approvals by EPA.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that the sensitive areas should be re-notified (if necessary) and the encroachments may be stopped/ reduced through active regulation/ monitoring and awareness programs under intimation to audit.

5.3 Non-Constitution of Environmental Damages Assessment and Confirmation Committee

According to Rule 4(1) of Compounding of Offences and Payment of Administrative Rules 2015, for the purpose of inspection and assessing environmental damages, the Director General, shall constitute an environmental damages assessment and confirmation committee comprising:

- a) Director (LAB/NEQS), Pakistan Environmental Chairperson, Protection Agency.
- b) Deputy Director (R&I), Pakistan Environmental Secretary, Protection Agency.
- c) Assistant Director (Legal/Enforcement) Pakistan Member, Environmental Protection Agency.
- d) Representative of Islamabad Capital Territory, Islamabad.

In addition, according to Rule 4(2) of Compounding of Offences and Payment of Administrative Rules 2015, the committee shall be responsible to visit the site, carryout inspection, assess damages according to Act and submit its report to the Director General clearly stipulating the amount of damages for the role of rehabilitation of these damage caused.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that Environmental Damage Assessment and Confirmation Committee was not constituted by the agency.

Audit is of the view that without constituting Environmental Damage Assessment and Confirmation Committee, the environmental damage is not possible to be measured.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that draft notification of Environmental Damage Assessment and Confirmation Committee has been prepared and shall be notified.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that the environmental damage assessment and confirmation committee should be constituted under intimation to audit.

5.4 Non-Formulation of Sectoral Guidelines

According to Rule 6(1) of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000, the Federal Agency may issue guidelines for preparation of an IEE or an EIA, including guidelines of general applicability, and sectoral guidelines indicating specific assessment requirements for planning, construction and operation of projects relating to particular sector.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that the sectoral guidelines of the following sectors were not prepared by Pak-EPA.

- Telecommunication sectors / Boaster towers/ Signal boaster cell towers.
- Collect, recycle, pile, reuse of waste, IT waste and disposal of radio waste
- IT industry
- Hydel power projects
- Wind power projects
- Electric transmission lines/ projects
- Gas/ LPG distribution industry/ oil distribution
- Sports grounds
- Slaughter houses

Audit is of the view that non-preparation of guidelines was violation of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000 and has led to non-observance and non-addressing of specific requirements of the designated sectors.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that Pakistan Environmental Assessment Procedures already contain sectoral guidelines for nine (9) major sectors. The revised

Review of IEE/EIA Regulations, 2000 are in process. Once notified, work on preparation of sectoral guidelines for the new sectors could be initiated by EPA.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that the guidelines on the remaining sectors should be developed under intimation to audit.

5.5 Non-formulation of rules for registration and regulation of environmental consultants by Pak-EPA

According to Section 31 of PEPA Act 1997, the Federal Government may, by notification in the official Gazette, make rules for carrying out the purposes of this Act including rules for implementing the provisions of the international environmental agreements, specified in the Schedule of this Act.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that the proponents submitted IEEs and EIAs for approval through consultants. However, during scrutiny of the record it was observed that the review committee raised certain objections upon the standard and format of IEE and EIA reports submitted by the consultants. Audit further observed that no mechanism of registering and regulating the consultants has so far been formulated by Federal EPA (List of consultants is at **Annexure-II**).

Audit is of the view that no mechanism is in place to regulate and register the environmental consultants.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that there is no specific provision in rules for registration and regulating consultants. However, the draft document for registration of environmental consultants has been prepared and shall be notified.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that proper rules and regulations should be framed for registration of environmental consultants in order to define a standardized criterion under intimation to audit.

5.6 Non-revision of EPA regulations to cover Industrial Sector

According to Section 31 of PEPA Act 1997, the Federal Government may, by notification in the official Gazette, make rules for carrying out the purposes of this Act including rules for implementing the provisions of the international environmental agreements, specified in the Schedule to this Act.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 20118-19 to 2020-21, it was observed that there are a number of areas /projects which are operational and are prone to cause adverse environmental effects but these are not included in Schedule I & II of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000 (Details are at **Annexure-III**).

Audit is of the view that the areas not covered in Regulation/Schedule I & II shows that regulatory framework needs to be revised to comprehensively address the environmental issues.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that revision of Pak-EPA Review of IEE / EIA Regulations, 2000 are in process. The new categories of projects have also been included therein to address the issue.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that the regulations should be revised by including the areas that are not covered in existing schedules besides issuance of Environmental Management Plans (EMPs) to the already established projects to control environmental pollution under intimation to audit.

5.7 Convening of public hearings in violation of rule

According to Rule 10 of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000 states as follows,

(1) In case of an EIA, the Federal Agency shall, simultaneously with issue of confirmation of completeness under clause (a) of sub-

regulation (1) of Regulation 9, cause to be published in any English or Urdu national newspaper and in a local newspaper of general circulation in the area affected by the project, a public notice mentioning the type of project, its exact location, the name and address of the proponent and the places at which the EIA of the project can, subject to the restrictions in sub-section (3) of section 12, be accessed.

- (2) The notice issued under sub-regulation (1) shall fix a date, time and place for public hearing of any comments on the project or its EIA.
- (3) The date fixed under sub-regulation (2) shall not be earlier than 30 days from the date of publication of the notice.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that public hearings of a number of cases were convened earlier than 30 days from the date of publication in the newspapers (Details are at **Annexure-IV**).

Audit is of the view that convening public hearing before the timeline was irregular.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that due to legal requirement, public hearing was convened.

The reply of management is not satisfactory as legal requirement under regulation 10 was not adhered to.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that public hearings should be organized and convened strictly in accordance with rules, so as to give sufficient time to responding citizens towards the input and comments under intimation to audit.

5.8 Operation of projects without environmental approvals by Pak-EPA

According to Section 12(1) of PEPA Act 1997, no proponent of a project shall commence construction or operation unless he has filed with the

Federal Agency an initial environmental examination or, where the project is likely to cause an adverse environmental effect, an environmental impact assessment, and has obtained from the Federal Agency approval in respect thereof.

In addition, according to Rule 3 and 4 of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000, a proponent of a project falling in any category listed in Schedule I & II shall file an IEE and EIA respectively with the Federal Agency, and the provisions of Section 12 shall apply to such project.

Further, according to Rule 19(2) of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000, after issuance of confirmation of compliance, the proponent shall submit an annual report summarizing operational performance of the project, with reference to the conditions of approval and maintenance and mitigatory measures adopted by the project.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that:

- Annual reports were not submitted by the proponents summarizing operational performance of the project, with reference to the conditions of approval, maintenance and mitigatory measures adopted by the project (Detail is at **Annexure-V**).
- During the field visit of Sector I-9, 1-10, Rewat Industrial Area and Humak, it was observed that a number of industries and hospitals were found operational without the required environmental approvals (Details are at Annexures-VI & VII).

Audit holds that the operation of industries without obtaining environmental approvals was not justified and led to environmental degradation.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that most of the industries currently operational are in designated areas. The same were established without seeking prior

environmental approval before 2000 and are being regulated through routine inspection, imposition of fines and constitution of complaints/ cases in Environmental Tribunal and Courts. Most of the public / private sector hospitals established in the ICT are currently being regulated under the provisions of the Hospital Waste Management Rules, 2005. The proponents did not submit annual report according to the condition of approval and due to overall human resource constraints in the section, follow up actions are limited.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that responsibility should be fixed against the person(s) responsible for weak monitoring. Further, steps should be taken by the Agency to improve monitoring mechanism and identify all the industries falling in Schedule I & II of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000 for taking corrective measures under intimation to audit.

5.9 Initiation of projects without environmental approvals

According to Rule 19(2) of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000, the Federal Agency accords its approval subject to certain condition that the proponent shall before commencing construction of the project, acknowledge acceptance of the stipulated conditions by executing an undertaking in the form prescribed in Schedule VII.

In addition, according to Section 12(1) of PEPA Act 1997, no proponent of a project shall commence construction or operation unless he has filed with the Federal Agency an initial environmental examination or, where the project is likely to cause an adverse environmental effect, an environmental impact assessment, and has obtained from the Federal Agency approval in respect thereof.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that:

- Pak-EPA issued conditional approvals for the commencement of construction without taking undertaking (as per Schedule-VII) from the proponents for compliance of conditional approvals (Detail is at Annexure-VIII).
- During the field visit in ICT, a number of commercial high rises, shopping malls and roads were found constructed/ underconstruction without obtaining the environmental approval from the Agency (Detail is at **Annexure-IX**).

Audit is of the view that:

- i. Construction by proponents without environmental approval was a violation of Section 12 of PEPA 1997. Further, no remedial action has so far been taken by the management to stop the work or impose any administrative penalty.
- ii. Issuance of environmental approval without taking undertaking from the proponents was a violation of Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000.

The observation was issued to Pak-EPA on 18.03.2022. The management replied that due to constraints of human resource of the field staff, taking cognizance of every violation of Section 12 is extremely difficult. However, the ever increasing number of receipts of IEE and EIA reports from the public and private sector projects in the last few years is reflective of untiring efforts of Pak-EPA to apprehend the violators. Pak-EPA has imposed penalties and constituted complaints in the Environmental Protection Tribunal Islamabad against such violations.

The reply of management is not satisfactory because number of projects are under construction without submission of IEEs/EIAs. Further, in certain cases undertakings were not obtained from those proponents who submitted IEEs/EIAs.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that EPA should stop the work immediately by issuing Environment Protection Order and impose penalties as per rules.

Further, Pak-EPA should prepare an inventory of all such projects which are under-construction without obtaining environmental approvals and submission of undertakings under intimation to audit.

5.10 Non-submission of EIAs by the proponents and inaction by EPA

According to Section 12(1) of PEPA 1997, no proponent of a project shall commence construction or operation unless he has filed with the Federal Agency an initial environmental examination or, where the project is likely to cause an adverse environmental effect, an environmental impact assessment, and has obtained from the Federal Agency approval in respect thereof.

Pak-EPA in certain projects advised the proponents to submit EIAs instead of IEEs after returning the IEEs to respective proponents.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that EIAs have not been submitted by the proponents so far. Further, no site inspection has been carried out to check the updated status of the projects (Details are at **Annexure-X**).

Audit is of the view that the units are still operating irregularly without environment approval, which shows weak internal controls and monitoring.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that the advice regarding submission of IEE or EIA report by the proponent against a particular project is issued in accordance with Schedule I or Schedule II of Pak-EPA review of IEE/ EIA regulations, 2000. There are instances where the proponent submits IEE report but the scale and scope of the project and the anticipated environmental impacts may require submission of EIA Report and are therefore accordingly advised.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that the management should look into the matter for corrective measures under intimation to audit.

5.11 Delayed processing and issuance of environmental approvals

According to Section 12(4) of PEPA Act 1997, the Federal Agency shall communicate approval or otherwise within a period of four months from

the date of the initial environmental examination or environmental impact assessment is filed complete in all respects in accordance with the prescribed procedure, failing which the initial environmental examination or, as the case may be, the environmental impact assessment shall be deemed to have been approved, to the extent to which it does not contravene the provisions of this Act and the rules and regulations made thereunder.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that:

- EPA requested additional information from the proponent in certain cases after lapse of the specified time (Detail is at **Annexure-XI**).
- Agency did not issue environmental approvals of IEEs/EIAs within the specified time (Detail is at **Annexure-XII**).
- Site inspection was not carried out in certain cases by the Environmental Monitoring Teams (EMT) at the time of submission/filling of IEEs/EIAs by the proponent (Detail is at Annexure-XIII).

Audit holds that delayed processing and non-issuance of approvals within the specified time is a violation of PEPA Act 1997.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that the Agency carries out initial review to firm up its comments and after approval of the competent authority, the same are forwarded to the proponent for reply. Regarding delay in issuance of environmental approvals, the processing and finalization of IEE and EIA cases is on part of the proponent as well as due to non-provision of Review comments by Committee members, capacity constraints of the EIA section and the requisite codal / legal formalities. Further, none of the project has been issued environmental approval without conduct of site inspection.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that Pak-EPA should devise a strategy keeping in view the available resources to fast track the processing of environmental

approvals and their issuance within the specified period under intimation to audit.

5.12 Non-recovery of penalties imposed on the proponents

According to Section 17(1) of PEPA Act 1997, whoever contravenes or fails to comply with the provisions of Section 11, 12, 13, or 16 or any order issued thereunder shall be punishable with fine which may extend to one million rupees, and in the case of a continuing contravention or failure, with an additional fine which may extend to one hundred thousand rupees for every day during which such contravention or failure continues and where such contravention or failure continues:

In addition, according to Rule 7(1) & 7(2) compounding of offences and payment of administrative penalty rules 2015. PEPA imposed the administrative penalties in violation of section (12) of PEPA Act 1997.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that Pak-EPA imposed penalties/fines on proponents in violation of section (12) of PEPA Act 1997. However, no record was found regarding submission of fines/penalties (Details are at **Annexure-XIV**).

Audit holds that non-availability of record shows weak internal controls.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that no case has been processed without the submission of fine in terms of Administrative Penalty.

The reply of management is not satisfactory as no documentary evidence was provided in support of reply.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that the amount should be recovered from the proponents and verified by audit.

5.13 Approval of Environment Management Plans (EMPs) on IEEs, instead of EIA basis

According to Rule 04 of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000, a proponent of a project falling in any category listed in Schedule II shall file an EIA with the Federal Agency, and the provisions of section 12 shall apply to such project.

In addition, according to Serial No. C(2) of Schedule II of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000, mining and processing of major non-ferrous metals, iron and steel rolling require EIA.

Pakistan Environmental Protection Agency received applications along with IEEs for approval of Environment Management Plan (Detail is at **Annexure-XV**).

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that Federal EPA issued EMPs to steel mills based on IEEs.

Audit is of the view that all the mining and processing of major non-ferrous metals, iron and steel rolling falls in Schedule II C(2) are required to submit EIAs instead of IEEs. Furthermore, the Agency issued EMPs instead of demanding EIAs from the proponent which was not justified.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that environmental approvals issued by Pak-EPA against EMPs primarily pertains to the projects which had been made operational without seeking prior environmental approval. Only two industries i.e. M/s Siddiqui Steel Furnace have been issued approvals based on their EMPs.

The reply of management is not satisfactory because mining and processing of major non-ferrous metals, iron and steel rolling falls in Schedule II C(2) are required to submit EIAs instead of IEEs.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that EIAs should be obtained from the projects falling in Schedule II of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000 under intimation to audit.

5.14 Incurring Expenditure on public hearing by proponents instead of Pak-EPA

According to Rule 10(1) of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000, in the case of an EIA, the Federal Agency shall, simultaneously with issue of confirmation of completeness under clause (a) of sub-regulation (1) of Regulation 9, cause to be published in any English or Urdu national newspaper and in a local newspaper of general circulation in the area affected by the project, a public notice mentioning the type of project, its exact location, the name and address of the proponent and the places at which the EIA of the project can, subject to the restrictions in sub-section (3) of section 12, be accessed.

Pak-EPA conducted Public hearing as required under EIA Regulations 2000 during the F.Y 2018-21.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that Pak-EPA charged the expenses of public hearing from the proponents (Detail is at **Annexure-XVI**).

Audit is of the view that the expenditures charged to the proponent for public hearing is violation of regulations.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that there was no budgetary provision to carry out the IEE/EIA review process including but not limited to the conduct of public hearing. It is however clarified that Pak-EPA does not charge the proponent for the incurred expenses, rather the arrangements are solely done by the proponents at their end.

The reply of management is not satisfactory because charging of public hearing expenditures to proponent is the violation of regulations.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that EPA should look into the matter for corrective actions under intimation to audit.

5.15 Non-constitution of Committee of experts for IEEs and delayed Constitution of Committee of Experts for Review of IEEs & EIAs

According to Rule 11(1) of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000, the Federal Agency shall make every effort to carry out its review of the within 45 days, and of the EIA within 90 days, of issue of confirmation of completeness under Regulation 9.

In addition, according to Rule 11(2) of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000. In reviewing the IEE or EIA, the Federal Agency shall consult such Committee of Experts as may be constituted for the purpose by the Director-General.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that:

- Proponents submitted IEEs & EIAs, whereas the committee of experts was constituted after couple of months to review the EIAs (Detail is at **Annexure-XVII**).
- Comments from reviewers in many cases were not received in time or not received at all and EPA had to proceed without the comments of all reviewers.
- No committee of experts was constituted for the review of IEEs (Detail is at **Annexure-XVIII**).

Audit holds that:

- Delayed constitution of committee of experts for review of IEEs & EIAs led to delayed issuance of environmental approvals.
- Non-constitution of Committee of Experts for IEEs led to nonevaluation of the individual projects, which may cause non-

determination and control of adverse impacts of the projects on the environment.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that the instances where during initial scrutiny of the IEE/EIA report, certain issues need to be clarified by the proponent in terms of major deficiencies in the reports or some legal issues regarding the project may arise. In such cases every efforts is made to seek initial clarifications before constitution of committee of experts and circulation of reports to the members. Further, the Committee of Experts (Review Committee) is constituted for review of every IEE/EIA report received from the proponent for consideration of grant of Environmental Approval by Pak-EPA.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that the responsibility should be fixed for delayed constitution and non-constitution of committee of experts for EIAs and IEEs respectively. Further, proper mechanism should be devised for timely constitution of committee for EIAs and IEEs under intimation to audit.

5.16 Non-existence of post-environmental approvals monitoring

According to Rule 18(1) of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000, For purposes of verification of any matter relating to the review or to the conditions of approval of an IEE or EIA prior to, during or after commencement of construction or operation of a project, duly authorized staff of the Federal Agency shall be entitled to enter and inspect the project site, factory building and plant and equipment installed therein

Pak-EPA is a regulatory body established under Section 5 of Pakistan Environmental Protection Act, 1997 for the protection, conservation, rehabilitation and improvement of the environment, for the prevention and control of pollution and promotion of sustainable development and to enforce/implement the provisions of the Act.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it

was observed that Pak-EPA issued Environmental approvals to the proponents to commence the projects with certain conditions. Audit observed that:

- Environmental approvals in respect of the projects were granted, however, no post approval monitoring was carried out to check the compliance of the approvals granted (Detail is at **Annexure-XIX**).
- In certain cases, the time lapsed after giving environmental approval to proponents for construction. Due to weak monitoring the current status of the projects is not known to Federal EPA, which may require confirmation after construction or approval before operational phase (Detail is at **Annexure-XX**).

Audit holds that non-existence of a proper post monitoring mechanism of approved Initial Environmental Examination (IEEs) and Environmental Impact Assessment (EIAs) raises question on the efficiency and effectiveness of monitoring activities carried out by EPA to protect environment.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that after issuance of environmental approval, project proponents do not intimate Pak-EPA about the date of operationalization of the project nor any request for confirmation of compliance had been received in Pak-EPA. Due to non-existence of field staff, effective monitoring cannot be ensured. Further, the EIA Section is currently functioning with only one officer and the post of Deputy Director (EIA/Mont) is lying vacant for the last two years. No field staff is available with the section to carry out post approval monitoring and ensure compliance status of condition of granted approval.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that effective post approval monitoring should be carried out to ensure compliance of conditions to the environmental approvals, environmental laws, rules and regulations under intimation to audit.

5.17 Non-submission of completion and annual reports

According to Rule 19(1) of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000, after issue of approval, the proponent shall submit a report to the Federal Agency on completion of construction of the project.

In addition, according to Rule 19(2) of Pakistan Environmental Protection Agency Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000, after issue of confirmation of compliance, the proponent shall submit an annual report summarizing operational performance of the project, with reference to the conditions of approval and maintenance and mitigation measures adopted by the project.

Further, according to Rule 13(2)(b) provides that the proponent shall submit a report to the Federal Agency on completion of construction of the project and seek approval before start of operational activities.

Pakistan Environmental Protection agency issued numbers of approval for construction of different projects for completion during 2018-21.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 20118-19 to 2020-21, it was observed that:

- Compliance reports on completion of construction of the project were not submitted by the proponents to the Agency (Detail is at **Annexure-XXI**).
- Annual reports were not submitted by the proponents summarizing operational performance of the project, with reference to the conditions of approval and maintenance and mitigatory measures adopted by the project (Detail is at **Annexure-XXII**).

Audit is of the view that non-enforcement of regulations to obtain compliance report upon completion and annual report during operational phase is a lapse on the part of EPA.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that submission of completion of construction of project reports is the responsibility of the proponents. There are issues due to absence of prosecution wing and limited capacity of legal section. Further, the proponents do not submit annual reports regarding the condition of approval and due to overall human resource constraints follow up actions are limited.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that EPA should devise a plan for effective enforcement of the EPA Act and regulations under intimation to audit.

5.18 Monitoring compliance of conditional environmental approvals

According to conditions of environmental approvals granted to proponents by Federal EPA,

- i. The proponent shall constitute Environment Management Committee (EMC), responsible for the management of solid/liquid/hazardous/hospital waste and other issues related to the environment and ensure compliance with all relevant NEQs.
- ii. The Environment Management Committee (EMC) shall liaise with Federal EPA for monitoring of EMP.
- iii. The proponents shall participate in activities for the protection of environment in Islamabad Capital Territory (ICT) to be planned in collaboration with Federal EPA under their CSR not in list amounting to Rs. 1.0 Million on annual basis.
- iv. The proponent shall ensure to have rainwater-harvesting practices, inverted well, and reuse of grey water.

During performance audit of Pak-EPA on approvals & clearances of IEEs / EIAs and post clearance monitoring during FY 2018-19 to 2020-21, it was observed that the proponents did not make compliance with the conditions mentioned in their conditional environment approval/ EMPs (Details are at **Annexure-XXIII & Annexure-XXIV**.)

Audit is of the view that non-compliance with the conditions of environment approvals by the proponent is a serious lapse on part of the EPA.

The observation was issued to the Pak-EPA on 18.03.2022. The management replied that non-constitution of Environmental Management Committee (EMC) and non-compliance of conditional approvals by the proponents is a violation of the conditions of environmental approval issued by Pak-EPA. Due to extreme human resource constraints faced by the Agency

for the post approval monitoring, legal actions could not be taken by the Agency.

DAC meeting was not convened by the PAO till finalization of the report despite repeated requests. Last reminder was issued on 31.05.2022.

Audit recommends that post-monitoring mechanism should be strengthened to ensure compliance with conditions of environmental approval by the proponents under intimation to audit.

6. Overall Assessment

The Pakistan Environmental Protection Act was introduced in the country in 1997 which provides for enforcement of quality standards, regulatory regime for hazardous substances and introduction of EIA/IEE review procedures and monitoring. The Federal EPA was established in Islamabad in pursuance of the EPA Act 1997. The Act provided for establishment of provincial EPA in all provinces. Over a period of time, the Environmental Protection Agencies (EPAs) were established at the federal level and all four provinces and they act as lead agencies to protect, conserve and improve environment in the country.

Relevance: One of the important functions of Environmental Protection Agency is to review the IEE/EIA reports and issue the environmental approvals to the proponents before starting constructions and operations of their projects/ programs. The EPA monitor the conditions of environmental approvals and in case of non-compliance of the conditions, initiate legal actions against the proponents.

Efficacy: Pak-EPA is observing the "Pakistan Environmental Protection Agency's Review of Initial Environmental Examination and Environmental Impact Assessment Regulations, 2000" notified by federal EPA. No specific budgetary allocation was made to follow the regulations while granting environmental approvals.

Efficiency: Timeline and budget allocations specific to the EPA process regarding grant of environmental approval to the industrial/commercial concerns was not made. Hence, time and cost over runs was not occurred.

Economy: The procurement of goods and services were not involved rather approval and clearance process regarding grant of environmental approvals was audited.

Effectiveness: EPA has made efforts for better environmental governance through grant of environmental approvals to the proponents before start of the projects. However, audit has highlighted some weak areas. Proper implementation of the audit recommendation may improve the performance and effectiveness of EPA with regard to environmental approvals.

Compliance with Rules: the entity was compliant with the laws, rules and regulations except some instances highlighted in the report.

7. CONCLUSION

The Performance Audit was carried out with the aim to examine the process of granting environmental approvals and monitoring by federal and provincial EPAs covering period of three years from 1st July, 2018 to 30th June, 2021. A comprehensive planning process and desk audit activity followed by field audit was carried out to study the process in depth and breadth with a view to provide a comprehensive analysis and findings on the significant issues.

It is apparent from the audit findings, that the guiding legislation for environmental protection exists at federal levels. Moreover, the institutional and administrative arrangements are also in place in the shape of Pak-EPA. The Pak-EPA has also made certain regulations in pursuance of respective Acts to carry out the purposes of the legislation, however there are deficiencies which need to be addressed in this respect as highlighted in the audit observations.

The problem lies in proper and effective implementation of the provisions of law and the regulations made thereupon. On one hand, the monitoring mechanism of Pak-EPA is either non-existent or very weak resulting in unchecked activities by the concerns and units leading to environmental degradation. On the other hand, the enforcement apparatus is also very weak and the defaulter undertakings are not being penalized for environmental violations. The penalties are not effectively being imposed and recovered so as to create a deterrence.

The overall fee structure of Pak-EPA also needs to be reviewed to bring uniformity to decrease parity for the proponents in different jurisdictions.

Pak-EPA is facing resource constraints which hinder its functioning and performance to play an effective role in protecting environment. These constraints include financial and human resource as well as lack of equipment, machinery and labs. The administrative departments should fast-track the recruitment of required staff and provision of necessary resources to the Agency enabling them to perform their functions as conceived in the framework of the guiding legislation.

Acknowledgement

We wish to express our appreciation to the management and staff of Pakistan Environment Protection Agency (Pak-EPA) for the assistance and cooperation extended to the auditors during this assignment.

Annexures

Annexure-I MFDAC Paras

	_	MITDAC Faras				
	Para	Subject				
No.	No.					
1.	1	Budget Allocation under the Head A09404 (Medical & Laboratory Equipment) for Laboratory				
2.	8	Weak enforcement of EIA/IEE regulations and delayed Imposition of Administrative penalty				
3.	9	Administrative penalties imposed not reflected in Bank statement				
4.	10	Environment Protection Orders				
5.	13	No provision for re-issuance of cancelled approval				
6.	17	Non-availability of information such as GPS and Project cost, Environment consultants, Environment Lab				
7.	28	Un-authorized construction/development/Operations by land developers in Zone-IV				
8.	30	Environment Assessment Advisory Committee				
9.	32	Acceptance of environmental reports for processing of environment approval from uncertified for processing of environment approval from uncertified labs				
10.	35	Key Performance Indicators/ Targets in Medium Term Budgetary Framework (MTBF) Proforma				
11.	36	Shortage of Human Resource for Field Visits and Monitoring Activities				
12.	37	Environmental Approval granting to Petrol Pumps not covered in the regulations				
13.	38	EMP issued for Asphalt mixing unit				
14.	39	Weak Regulation resulting into improper waste disposal in ICT				
15.	40	Unauthorized approval granted not found in the records				
16.	41	Non-Disclosure of Environment Impact Assessment (EIAs) and Initial Environmental Examination (IEEs) approvals				
17.	42	Non Availability of Lab equipment's				
18.		No Mechanism to adopt against projects existed before promulgation of PEPA Act, 1997				

Annexure-II Para No. 5.5

G	Para No.				
Sr. No.	Name of Project	EIA / IEE	Fees	Environment	Application
NO.		IEE		Consultant	date
	MATRC (Model addiction			Bio green	
	treatment & Rehab Centre)			Environment	
1		IEE	15000	consultants	01.02.2021
	Siddiqui steel Billet			EMC Pvt. Ltd.	
2	Manufacturing	IEE	15000		12.11.2018
3	River garden Zone-V Extension	IEE	15000	ESP	08.02.2020
	Hamdard University			Geo-tech	
				consultancy	
4		EIA	30000	services	04.08.2017
	FGEHA Green Enclave-I Zone-			Green Tech Env.	25.03.2020
5	I V B-2 Bahara Kahu	EIA	30000	Consultants	24.09.2020
	Gulberg greens farmhouse			Hagler Bailey Pak	
6	scheme	EIA	30000	,	12.10.2018
	EIA Islamabad Model Town,			Humaira Qasim	
7	Zone IV-B, Islamabad	EIA	30000		02.07.2020
	Amazon Mall DHA			Humaira Qasim	
8		IEE	15000		18.06.2019
	Fortune Empire E-11 Zone-Iv			Humaira Qasim	
9	Islamabad	IEE	15000		23.06.2020
	Golf floras apartments Projects,			M/s Environs Tech	
	Garden city Bahria Town Zone-			Pvt Ltd.	
10	V	EIA	30000		14.12.2020
11	IJP Road Faizabad Interchange	EIA	30000	M/s Zeeruk Intl.	24.12.2020
	Extension of extensive care			NESPAK	
	dept. of mother child health				
12	centre and children hospital	EIA	30000		30.09.2020
	Bahria town-lifestyle			Project	
13		EIA	30000	Procurement Intl.	04.09.2021
	3 Star Hotel			Project	
14		IEE		Procurement Intl.	04.03.2021
15	Asphalt Mixing Plant	IEE	15000	SEM Pvt. Ltd	01.08.2019

Annexure-III Para No. 5.6

Sr. No.	Areas need to require Checklist/IEE/EIA.						
1	Construction of, offices and small commercial buildings (1-6 story),home						
1	industrial units, ware houses, marriage / banquet facilities, large scale motor						
	vehicles workshops, restaurants / food outlets ,large baking unit subject to the						
	compliance with existing zoning laws.						
2	Reconstruction / rehabilitation of roads (small roads in urban area and farm to						
	market roads more than 2 km.						
3	On-farm dams and fish farms.						
4	Pulses mills.						
5	Projects promoting energy efficiency (small scale).						
6	Lining of existing minor canals and /or water courses.						
7	Canal cleaning						
8	Forest harvesting operations						
9	Rain harvesting projects						
10	Rural schools and rural and basic health units having at least ten beds capacity.						
11	BTS Towers						
12	Lime Kilns						
13	Brick Kilns						
14	Ice factories and cold storage.						
15	Cotton oil mill						
16	Warehouses for pesticides and pharmaceuticals						
17	Construction of LPG/LNG storage facility (more than 50 mmbtu)						
18	Scrap Yards (Kabar Khana)						
19	Asphalt Plants						
20	Batching Plants						
21	Petrol Pumps, CNG, LNG, LPG stations including filling stations						
22	Car service stations or service stations						
23	Slaughter Houses						

Annexure-IV Para No. 5.7

Sr. No	Name of Project	EIA / IEE	1st Public hearing	1st Public hearing dated	2nd Public hearing	2nd Public hearing
•			add dated	nearing dated	add dated	dated
1	Technology Development Park Project Chak Shahzad	EIA	26.08.2020	29.09.2020 cancelled	16.10.2020	28.10.2020
2	Construction of Multistory Apartments at Sector I-12/1	EIA	16.02.2022	16.03.2022		
3	Metro Peshawar Morr	EIA	01.06.2017	13.06.2017		
4	Elysium Tower, Blue Area Islamabad	EIA	21.12.2016	24.01.2017	04.02.2017	09.02.2017

Annexure-V Para No.5.8

Sr.	Name of Project	EIA /	Applicati	Date of
No.		IEE	on date	Approval
1	Siddiqui steel Billet Manufacturing	IEE	12.11.18	12.03.20
2	Taibah Steel Rerolling Steel mill	IEE	19.11.18	08.08.19
3	One express way, Corporate office Building Project, Gulberg Greens	IEE	07.12.18	10.02.20
4	Asphalt Mixing Plant, Sector H-10, Kashmir Highway, Islamabad	IEE	01.08.19	12.09.19
5	D-Tech waste solution facility Hummak CDA, Industrial Triangle, Islamabad	IEE	24.09.19	17.07.20

Annexure-VI Para No. 5.8

Sr.	Category	Name of Industries Location	
No.			
1		M/s S.H. Steel	I-9/2, Islamabad
2		M/s West Service Road	I-9/2, Islamabad
3	Steel	M/s Potohar Steel Industries	I-9/2, Islamabad
4	Mills	M/s Pak Steel Mills	I-9/2, Islamabad
5		M/s Ittehad Foundary	I-9/2, Islamabad
6		M/s Al-Hadeed Industries	I-9/2, Islamabad

7		M/s Zia Steel Mills	I-10/3, Islamabad
8		M/s Karachi Steel	I-10/3, Islamabad
		M/s Met Cast Private Limited (Mumtaz	
9		Steel)	I-9/2, Islamabad
10		M/s Fazal Steel Mill	I-9/2, Islamabad
		M/s Hassan Steel Mill	I-9, Industrial area
11			Islamabad
		M/s Mustahikam Steel Mill	I-9, Industrial area
12			Islamabad
		M/s MIZ Re-rolling	I-9, Industrial area
13			Islamabad
14		Sawat Marble	I-9/2, Islamabad
15		Kashmir Marble	I-9/2, Islamabad
16		Mughal Marble	I-9/2, Islamabad
17		Atlas Marble	I-9/2, Islamabad
18		International Marble	I-9/2, Islamabad
19		Mustafa Marble	I-9/2, Islamabad
		Marble Granite	I-9, Industrial area
20			Islamabad
		Saleem Marble Trader	I-9, Industrial area
21			Islamabad
		Shan Granite & Marble	I-9, Markez,
22	Marble		Islamabad
	Industries	Hussain Marble	I-9, Markez,
23	maastries		Islamabad
		K-2 Marble	I-9, Markez,
24			Islamabad
25		Kandore Marble Industry	I-10/3, Islamabad
		Khan Marble & Chips	I-9, Markez,
26			Islamabad
		Asian Marble Industry	I-9, Industrial area
27			Islamabad
		Al-faisal Marble Industry	Peshawar road,
28			Tarnol, Islamabad
20		Nasrullah Marble & Granite	I-9, Industrial area
29		Di i Diversi e	Islamabad
20		Pharmion PVT LTD	I-10/3, Industrial
30			Area Islamabad
2.1	Pharmace	GlaxosmithKline Islamabad	I-9/3 Industrial Area (
31	utical	Will I Di	Islamabad,
22	Industries	Wilson's Pharmaceuticals	I-9/3 Industrial Area •
32	4	G . Di	Islamabad,
33		Scotmann Pharmaceuticals	I-9/3 Industrial Area (

			Islamabad,	
		Cirin Pharmaceuticals Pvt Ltd -		
34		Manufacturing Plant	G-15/3, Islamabad	
35		5Stars Pharmaceutical company	G-15/3, Islamabad	
36		Pearl Pharmaceutical	I-10/3 Islamabad,	
37		Med-X Pharma	G 14/4, Islamabad,	
38		Getz Pharma	I-10/3, Islamabad,	
		AXON Pharma Private Limited	Wali Heights, B	
			Block, Zaraj,	
			opposite Giga Mall,	
39			Islamabad,	
		AMSON Vaccines and Pharma Pvt. Ltd.	Industrial Triangle	
			Khuda Bakhsh Road,	
			Kahuta Rd,	
40			Islamabad	
		S. Ejazudin & Co	I-9/3 I 10/3 I-10,	
41			Islamabad,	
		Crest Pharmaceuticals	Industrial Triangle	
42			Humak	
		Herbion Pakistan (Pvt.) Ltd Islamabad	Sector A DHA Phase	
43		Plant	II, Islamabad	
		Novartis Pharma (Pakistan) Limited	Sector I-10 /3,	
44			Islamabad	
		Attabak Pharmaceuticals Industries	I-10/3, Industrial	
45			Area Islamabad	
		Breeze Pharma (Pvt.) Ltd.	Humak Islamabad,	
46			Islamabad	
47	Air	Green Appliances (Pvt.) Ltd.	I-9/3, Islamabad	
	conditione	Glory Air HVAC & Air condition	Rawat Industrial	
48	r	manufacturers	Estate, Islamabad	
49	manufactu	MIA Group of Companies (Pvt.) LTD.	I-9/3, Islamabad	
	ring	Air Mech. Engineering Industries (Pvt.)	I-10/3, Industrial	
50	company	Ltd. (Industrial Fans & HVAC Engineers)	Area Islamabad	
51		Humak Engineering Pvt. Ltd	I-9/3, Islamabad	
52		Hina Soap Industries	I 9/2 , Islamabad	
	Soaps &	Kashmir soaps factory & Chemicals Isb.	Rawat Industrial	
53	detergents	* *	Area	
54	manufactu	Sethi Soap Industries	I 9/2, Islamabad	
55	ring	Karachi Soap Industries HEAD OFFICE	I-9/3, Islamabad	
	industries	New Karachi Soap Industries	E-3 Rawat Industrial	
56			Estate	
57		Dupas	I-10/3, Islamabad	
58	Oil &	Hafeez Iqbal Oil & Ghee Industries Pvt.	I-9/3, Islamabad	

	Ghee	Ltd.	
59	Manufact	ACP Oil Mills	I 9/2, Islamabad
60	uring	AW Group of Industries	I-10/3, Islamabad
	Industries	Rawat Oil & Ghee Mills Pvt. Ltd.	Rawat Industrial
61			Area
62		Latif Group	I-10 Markaz
		Mehboob Flour & General Mills	Service road I-9/3,
63			Islamabad
		Sihala Flour & General Mills (Pvt.)	Service road I-9/3,
64		Limited	Islamabad
65	Flour	Islamabad Flour Mills	I-9/3, Islamabad
66	Mills	Kashmir Flour & General Mills	I-9/3, Islamabad
	IVIIIIS	MIDJAC Flour Mill	I-9, Industrial area
67			Islamabad
68		National Flour Mill	I-9/3, Islamabad
69		Waqar Flour & General Mills Pvt Ltd	I-9/3, Islamabad
70		United Flour Mills	I-9/3, Islamabad
71		State Life Building	Blue Area Islamabad
72		Allied Bank Building	I-8 Markaz
73	Building	City Arcade	I-8 Markaz
74]	Galleria Islamabad	I-8 Markaz
75		Zaki Center	I-8 Markaz

Annexure-VII Para No.5.8

Sr. No.	Name of Hospital	Category
1	Pakistan Institute of Medical Sciences (PIMS)	Government
2	Federal Government Services Hospital	Government
3	Capital Hospital (CDA Hospital)	Government
4	National Institute of Health	Government
5	Nuclear Oncology & Radiotherapy Institute (NORI)	Government
6	Nescom Hospital	Government
7	KRL Hospital	Government
8	Ali Medical Centre	Private
9	Maroof International Hospital	Private
10	Kulsum International Hospital	Private
11	Integrated Health Services	Private
12	HS Children's Medical Centre	Private
13	Medicsi	Private

Sr. No.	Name of Hospital	Category
14	Islamabad International Hospital & Research Center	Private
15	Amanat Eye Hospital	Private
16	Maxhealth Hospital	Private
17	Family Health Hospital	Private
18	Medcity International hospital	Private
19	The Diabetes Centre	Private
20	PAF hospital	Semi-Government
21	PNS Hafeez	Semi-Government
22	PAEC general hospital	Semi-Government

Annexure-VIII Para No. 5.9

Sr.	Name of Proponent	EIA/	Environm	EMP on	Undertak
No.		IEE	ental		ing as
			Approval		per
			on		Schedule
					VII
	IEE Report of Taibah Steel Re-Rolling	IEE		08.08.2019	No
1	Mills				
2	Siddiqui steel Billet Manufacturing	IEE		12.03.2020	No
3	Gulberg greens farmhouse scheme	EIA	22.03.2020		No
	Construction of Underpass between G-	EIA			No
4	7/ G-8				
5	Traffic Management Solutions for	EIA	23.12.2020		No
	Rawal Chowk and Park Road				
6	Naval Housing Scheme Zone-V	IEE			No
7	Metro Peshawar Morr	EIA	01.02.2018		No
8	Kingsley Arcade F-6	IEE	01.11.2017		No
9	Tarnol Underpass Interchange	EIA	07.16.2017		No
10	Golf floras apartments Projects,	EIA	31.05.2021		No
	Garden city Bahria Town Zone-V				
11	IJP Road Faizabad Interchange	EIA	24.09.2021		No
12	Asphalt Mixing Plant	EIA			No

Annexure-IX Para No. 5.9

	List of Sites/projects found u	nder construction du	ring field visit
Sr.	Name	Location	Status
No.			
1	Ramada Hotel G 6	G-6	Under construction
2	Saif ullah Tower	G-6	Under construction
3	Jalal Arcade	Muavia Road G 9/1	Under construction
4	SAARC Chamber of Commerce	Muavia Road G 9/1	Under construction
5	Angro Company plaza Muavia road G 9	Muavia Road G 9/1	Under construction
6	Federal Employees Building Service road G 9	Service Road G9/1	Under construction
7	Employees Old Age Benefits	I-8 Markaz	Under construction
8	The Arc Building	I-8 Markaz	Under construction
9	Investage I 8 Markaz	I-8 Markaz	Under construction
10	Inforium I 8 Markaz	I-8 Markaz	Under construction
11	Mozaic Tower	I-8 Markaz	Under construction
12	Interlace	I-8 Markaz	Under construction
13	Winston Mall & Residentia	B-17	Under construction
14	Emporium	B-17	Under construction
15	Emporium Extension	B-17	Under construction
16	Mall of B-17	B-17	Under construction
17	Mall of Islamabad	Blue Area	Under construction
18	Park land tower	Blue Area	Under construction
19	See 3 towers	Blue Area	Under construction
20	CDA at F 10 round about	F 10	Under construction
	Expansion of Islamabad	Islamabad	Under construction
21	Expressway and construction of railway bridge	Expressway	
22	Emporium Square	I-8 Markaz	Under construction
23	National Covid 19 Centre	G-10	Under construction
		Islamabad	
24	Mall of Arabia	Expressway	Under construction
25	Pak China Mall	G-9 Markaz	Under construction
26	Senate Housing Society		Under construction
27	Eighteen		Under construction

Annexure-X Para No. 5.10

Sr.	Name of Proponent	Remarks
No.		
1	National police foundation housing	The proponent has been advised
	society, Islamabad	to submit EIA instead of IEE.
2	Paradise Housing Society	The proponent has been advised
		to submit EIA instead of IEE.
3	Supreme court employees cooperative	The proponent has been advised
	housing society, Islamabad	to submit EIA instead of IEE.
4	Aiwan e siyahat tourism complex F-5	The proponent has been advised
	Islamabad	to submit EIA instead of IEE.
5	PHA -F Multi storied apartments G-10 and	The proponent has been advised
	G-11	to submit EIA instead of IEE.
6	Zameen Ace Mall DHA Phase 2	The proponent has been advised
		to submit EIA instead of IEE.
7	Bahria Life Style project Islamabad	The proponent has been advised
		to submit EIA instead of IEE.
8	IEE Report of Rehman Enclave Zone IV-	The proponent has been advised
	B, Islamabad	to submit EIA instead of IEE.

Annexure-XI Para No. 5.11

Sr. No.	Name of Project	Application Received	Any additional information
			demanded by
			EPA dated
1	EIA Report of Sangjani Landfill Site Islamabad	18.11.2019	15.12.2019
2	IEE Report of Rehman Enclave Zone IV-B, Islamabad	27.07.2021	5.10.2017
3	Zameen Ace Mall DHA Phase 2	26.11.2019	03.12.2019
4	Bahria Life Style project Islamabad	04.09.2021	16.09.2020
5	IEE Report of Rehman Enclave Zone IV-B, Islamabad	27.07.2021	5.10.2017
6	FGEHA Green Enclave-I Zone-I V B-2 Bahara Kahu	25.03.2020	24.09.2020
7	MATRC (Model addiction treatment & Rehab Centre)	01.02.2021	31.05.2021
8	Naval Housing Scheme Zone-V	20.04.2016 06.06.2016	

9	NTDC project in/out of one circuit of 220 kwa	21.07.2017	04.10.2017
	Mansehra		
10	132 kwa grid station sector g-9/3 and its feeding	24.05.2017	06.06.2017
	transmission line		
11	Traffic Management Solutions for Rawal Chowk	21.05.2020	13.07.2020
	and Park Road		
12	Extension of extensive care dept. of mother child	30.09.2020	23.11.2020
	health center and children hospital		

Annexure-XII Para No. 5.11

Sr.	Name of		Fees	Env.	Lab.	Apply	Initial	Initial	Approval
No.	Project	/ IEE		Consultan		date	comments	comments	
				t			forwarde	replied by	
							d by EPA	Proponent	
		EIA	3000			17.03.16	01.04.16	16.05.16	01.02.17
	of Attaturk		0						
	(west) from								
	Khayabane								
1	Suharwarde								
	to								
	Khayabane								
	Magalla								
	Metro	EIA	3000			13.04.17			01.02.18
2	Peshawar		0						
	Morr								
	Tarnol	EIA	3000			11.11.15	25.11.15	29.12.15	07.06.17
3	Underpass		0						
	Interchange								
		EIA	3000		Asian	11.12.19	03.02.20	21.02.20	10.12.20
	Technology		0		Enviro				
4	Developmen				nment				
4	t Park				Service				
	Project Chak				s Pvt.				
	Shahzad				Ltd				
	NIRM Bio-	EIA	3000			14.03.21	26.03.21	05.04.21	16.08.21
5	medical		0						
5	waste								
	incinerator								
	Grade	EIA	3000		Green	16.05.16	24.05.16	12.08.16	20.07.17
	Separation		0		crescen				
6	Facility at				t				
	Intersection								
	of 7th								

	Avenue								
	Gulberg	EIA	3000	Hagler		12.10.18	11.12.18	26.12.18	22.03.20
	greens		0	Bailey		12.10.10	11.12.10	20.12.10	22.03.20
7	farmhouse			Pak					
	scheme			Tun					
	Traffic	EIA	3000			21 05 20	13.07.20	30.07.20	23.12.20
	Management		0			21.05.20	13.07.20	20.07.20	23.12.20
_	Solutions for								
8	Rawal								
	Chowk and								
	Park Road								
	Elysium	EIA	3000			20.07.16	01.08.16		24.02.17
	Tower, Blue		0						
9	Area								
	Islamabad								
	IJP Road	EIA	3000	M/s	ESPA	24.12.20	13.01.21	17.02.21	24.09.21
10	Faizabad		0	Zeeruk	K				
	Interchange			Intl.					
	Hamdard	EIA	3000	Geo-tech	HSE	04.08.17	18.08.17	31.08.17	26.11.18
11	University		0	consultan	service				
11				cy	S				
				services					
	Extension of	EIA	3000	NESPAK		30.09.20	23.11.20	11.01.21	29.07.21
	extensive		0						
	care dept. of								
12	mother child								
	health centre								
	and children								
	hospital		2000	3.7.1	Eap 1	1 1 1 2 2 2	0.5.04.00	11.01.01	21.07.21
	Golf floras	EIA	3000			14.12.20	06.01.20	11.01.21	31.05.21
	apartments		0	Environs	K				
13	Projects,			Tech Pvt					
	Garden City			Ltd.					
	Bahria Town								
	Zone-V	IEE	1500			16 02 17	02.02.17	00 02 17	01 11 17
14	Kingsley	IEE	1500			16.02.17	03.03.17	08.03.17	01.11.17
	Arcade F-6	IDD	1500	Dia aman	Dala	01 02 21	21.05.21	26.09.21	10.01.22
	MATRC	IEE	1500	Bio green Environm		01.02.21	31.05.21	26.08.21	10.01.22
	(Model		U	ent	green enviro				
15	addiction			consultant					
13	treatment &			S S	ering				
	Rehab			s	pvt.				
	Centre)				Ltd.				
Щ_	centre)				Liu.				

Annexure-XIII Para No. 5.11

Sr.	Name of Proponents	EIA /	Application	1st SIR	1st Visit
No.	Name of Fropolicits	IEE	date	dated	dated
110.	EIA Report of Zameen Ace Mall	ILL	dute	datea	dated
1	DHA Phase II Islamabad	EIA	26.11.2019	No	
	Request for NOC for Naval		20.11.2019	1,0	
2	Anchorage Zone-V, Islamabad	IEE	17.01.2020	No	
	IEE Report of Rehman Enclave				
3	Zone IV-B, Islamabad	IEE	27.07.2021	No	
	EIA Report of PARR-3 PINTECH,				
4	Nilore Islamabad	IEE	18.05.2020	No	
	IEE Report of Taibah Steel Re-				
5	Rolling Mills	IEE	07.07.2018	No	
	Technology Development Park				
6	Project Chak Shahzad	EIA	11.12.2019	02.06.2020	02.06.2020
	Siddiqui steel Billet Manufacturing	IEE	12.11.2018	04.02.2019	09.01.2019
	Kingsley Arcade F-6	IEE	16.02.2017	05.04.2017	03.03.2017
	Construction of Multistory				
9	apartments at Sector I-12/1	EIA	25.09.2018	05.11.2018	29.10.2018
	Extension of extensive care dept. of		30.09.2020	06.11.2020	27.10.2020
	mother child health centre and				
10	children hospital	EIA			
	Grade Separation Facility at				
11	Intersection of 7th Avenue	EIA	16.05.2016	07.02.2017	01.02.2017
12	Bahria town-lifestyle	EIA	04.09.2021	08.10.2020	
			20.04.2016		
	Naval Housing Scheme Zone-V	IEE	06.06.2016	09.02.2017	08.02.2017
14	Tarnol Underpass Interchange	EIA	11.11.2015	09.04.2016	
15	IJP Road Faizabad Interchange	EIA	24.12.2020	10.02.2021	04.02.2021
	River garden Zone-V Extension	IEE	08.02.2020	12.10.2020	12.10.2020
17	Gulberg greens farmhouse scheme	EIA	12.10.2018	19.04.2019	19.04.2019
	Golf floras apartments Projects,				
18	Garden city Bahria Town Zone-V	EIA	14.12.2020	20.01.2021	15.01.2021
19	Hamdard University	EIA	04.08.2017	20.09.2017	20.09.2017
	MATRC (Model addiction				
20	treatment & Rehab Centre)	IEE	01.02.2021	21.04.2021	19.04.2021
	Construction of Underpass between				
21	G-7/ G-8	EIA		22.12.2016	12.02.2016
	FGEHA Green Enclave-I Zone-I V		25.03.2020		
22	B-2 Bahara Kahu	EIA	24.09.2020	23.11.2020	18.11.2020
23	Amazon Mall DHA	IEE	18.06.2019	24.01.2020	01.10.2019
	Elysium Tower, Blue Area				
<u>24</u>	Islamabad	EIA	20.07.2016	31.10.2016	24.10.2016

Annexure-XIV Para No. 5.12

Sr.	Name of Duciost	EIA/	Fees	Fine	Annuoval	EMP
	Name of Project		rees	_	Approval	
No.		IEE		imposed		approval
	Construction of	EIA	30000	700000		
	Multistory					
	apartments at Sector					
1	I-12/1					
		EIA	30000	1,000,000	01.02.2018	
	Metro Peshawar					
2	Morr					
	Siddiqui steel	IEE	15000	22,100,000		12.03.2020
3	Manufacturing					
	IEE Report of	IEE	15000	500000	08.08.2019	
	Taibah Steel Re-					
4	Rolling Mills					

Annexure-XV Para No. 5.13

Sr.	Name of Proponent	Date of	EMP issued	EIA required to
No.		submission of	based on	be submitted
		IEE	IEE	under Schedule-
				II
1	IEE Report of Taibah Steel	07.07.2018	08.10.2019	C(2)
	Re-Rolling Mills			
2	IEE Report of Siddique Mills	12.11.2018	12.03.2020	C(2)

Annexure-XVI Para No. 5.14

Sr. No.	Name of Project	1st Public hearing dated	1st Public hearing dated	Advertise ment published by	Refresh ments for the Participa nts	No. of Executiv e summar y of EIA Reports	Hard Copie s of EIA	Dispatch of Invitation letters	Banner size in ft
1	EIA Islamabad Model Town, Zone IV-B, Islamabad	19.12.20	19.01.21	proponent	100	50	35	by proponent	8
/.	IJP Road Faizabad	22.06.21	26.07.21	proponent	-	50	40	by proponent	8

Sr. No.	Name of Project	1st Public hearing dated	1st Public hearing dated	Advertise ment published by	Refresh ments for the Participa nts	No. of Executiv e summar y of EIA Reports	Hard Copie s of EIA	Dispatch of Invitation letters	Banner size in ft
	Interchange								
	Golf floras apartments Projects, Garden city Bahria Town Zone-V	09.02.21	11.03.21	proponent	100	50	35	by proponent	8
4	NIRM Bio- medical waste incinerator	30.05.21 31.05.21	29.06.21	proponent		50	50	by proponent	10
5	feeding transmissio n line	23.06.17	25.07.17	proponent		50	35	by proponent	7
6	Hamdard University	01.10.17	02.11.17	proponent	100	50	35	by proponent	7
	NTDC project	04.11.17	06.12.17	proponent	100	50	35	by proponent	7
8	Extension of extensive care dept. of mother child health center and children hospital		22.06.21	proponent		50	35	by proponent	7
	Morr	01.06.17	13.06.17						
	Gulberg greens farmhouse scheme			proponent	120	50	35	by proponent	7
11	Technology	26.08.20	29.09.20	50	100	50	35	by	7

Sr. No.	Name of Project	1st Public hearing dated	1st Public hearing dated	Advertise ment published by	Refresh ments for the Participa nts	No. of Executiv e summar y of EIA Reports	Hard Copie s of EIA	Dispatch of Invitation letters	Banner size in ft
	Developme nt Park Project Chak Shahzad		cancelled					proponent	
12	Intersection of 7th Avenue	23.04.17	25.05.17						
13	Traffic Managemen t Solutions for Rawal Chowk and Park Road	06.09.20	06.10.20						
14	Construction of Multistory apartments at Sector I-12/1	16.02.22	16.03.22						
	between G- 7/ G-8	22.04.17	25.05.17						
16	Area Islamabad	21.12.16	24.01.17						
17	Ternol Underpass Interchange	15.10.16	25.11.16						

Annexure-XVII Para No. 5.15

			1		1		Para		•15
Green Enclave-I Zone-I V B-	Member- I DG Environ ment, MOCC	Member- II DG Environ ment, CDA	Member -III Chief Environ ment, MO PD&R	Mr. Zia ul Islam Environ mental Expert	Dept. of Environme ntal	Chairm an, WLMB	Comme nts by RC forwar ded to Propon ent	Repl y to com ment s by RC	Date of PH
Constituted on	3.10.20	03.10.20	03.10.20	03.10.20	03.10.20	03.10.2 0	10.12.2 0		
EIA Forwarded 0'	07.10.20	07.10.20	07.10.20	07.10.20	07.10.20	07.10.2 0			
Comments received on		10.11.20	23.11.20	10.11.20					
Reminders 1 1	1.01.21				11.01.21	11.01.2 1			
Reminders 2 03	3.02.21				03.02.21	03.02.2 1			
Model Town, Zone	DG Environ nent,	Member- II DG Environ ment, CDA	Chief	Environ mental	Environme		Comme nts by RC forwar ded to Propon ent		Date of PH
Constituted on 1:	5.07.20	15.07.20	15.07.20	15.07.20	15.07.20		05.10.2 0		19.01. 21
EIA Forwarded 10 on	6.07.20	16.07.20	16.07.20	16.07.20	16.07.20				
Comments received on	2.02.20	10.00.20	23.07.20	23.07.20					
		18.08.20			18.08.20				
Reminders 2 09	9.09.20	09.09.20			09.09.20				
IJP Road I	DG Environ	Member- II DG Environ	Chief Environ	Mr. Zia ul Islam Environ mental	Environme	Chairm an,	Comme nts by RC forwar ded to	y to com ment	Date of PH
Interchange m		ment, CDA	ment, MO PD&R	Expert	, UET, Taxila		Propon ent	s by RC	

on						1		5.21	21
EIA						13.01.2			
Forwarded	13.01.21	13.01.21	13.01.21	13.01.21	13.01.21	13.01.2			
on						1			
Comments			04.02.21	04 02 21					
received on			04.02.21	04.02.21					
Reminders 1	23.02.21	23.02.21			23.02.21				
Reminders 2	09.03.21	09.03.21			09.03.21				
Golf floras apartments Projects, Garden city Bahria Town Zone- V	Member- I DG Environ ment, MOCC	Member- II DG Environ ment, CDA	Member -III Chief Environ ment, MO PD&R	ul Islam Environ		Chairm an, WLMB	Comme nts by RC forwar ded to Propon ent	y to com	Date of PH
Constituted on	13.12.20	13.12.20	13.12.20	13.12.20	13.12.20	13.12.2 0	03.02.2	04.0 2.21	
EIA Forwarded on	06.01.21	06.01.21	06.01.21	06.01.21	06.01.21	06.01.2 1			
Comments received on		25.01.21	12.01.21	12.01.21					
	Mombar	Member-	Member -III	Mr. 7ia	D 4 D 4 6		Comme	Repl	
NIRM Bio- medical waste incinerator	I DG Environ ment, MOCC	II DG Environ ment, CDA	Chief Environ ment, MO PD&R	ul Islam	RA Dept. of Environme ntal Sciences IIUI		nts by RC forwar ded to Propon ent	y to com	Date of PH
medical waste	I DG Environ ment,	II DG Environ ment,	Chief Environ ment, MO	ul Islam Environ mental Expert	Environme ntal Sciences IIUI		RC forwar ded to Propon	y to com ment s by RC	
medical waste incinerator Constituted	I DG Environ ment, MOCC	II DG Environ ment, CDA	Chief Environ ment, MO PD&R 24.03.21	ul Islam Environ mental Expert	Environme ntal Sciences IIUI 24.03.21		RC forwar ded to Propon ent 25.06.2	y to com ment s by RC	of PH 29.06.
medical waste incinerator Constituted on EIA Forwarded	I DG Environ ment, MOCC	II DG Environ ment, CDA	Chief Environ ment, MO PD&R 24.03.21	ul Islam Environ mental Expert 24.03.21 26.03.21	Environme ntal Sciences IIUI 24.03.21		RC forwar ded to Propon ent 25.06.2	y to com ment s by RC	of PH 29.06.
medical waste incinerator Constituted on EIA Forwarded on Comments received on	I DG Environ ment, MOCC	II DG Environ ment, CDA	Chief Environ ment, MO PD&R 24.03.21 26.03.21	ul Islam Environ mental Expert 24.03.21 26.03.21	Environme ntal Sciences IIUI 24.03.21		RC forwar ded to Propon ent 25.06.2	y to com ment s by RC	of PH 29.06.
medical waste incinerator Constituted on EIA Forwarded on Comments received on	I DG Environ ment, MOCC 24.03.21 26.03.21	II DG Environ ment, CDA 24.03.21 26.03.21	Chief Environ ment, MO PD&R 24.03.21 26.03.21	ul Islam Environ mental Expert 24.03.21 26.03.21	Environme ntal Sciences IIUI 24.03.21 26.03.21		RC forwar ded to Propon ent 25.06.2	y to com ment s by RC	of PH 29.06.
medical waste incinerator Constituted on EIA Forwarded on Comments received on Reminders 1 Reminders 2 132 kw grid	I DG Environ ment, MOCC 24.03.21 26.03.21 20.05.21 07.06.21	II DG Environ ment, CDA 24.03.21 26.03.21 20.05.21 07.06.21	Chief Environ ment, MO PD&R 24.03.21 26.03.21 06.04.21	ul Islam Environ mental Expert 24.03.21 26.03.21 29.05.21	Environme ntal Sciences IIUI 24.03.21 26.03.21 20.05.21 07.06.21 Chairman,		RC forwar ded to Propon ent 25.06.2 1	y to com ment s by RC 14.0 6.21	of PH 29.06.
medical waste incinerator Constituted on EIA Forwarded on Comments received on Reminders 1 Reminders 2 132 kw grid station	I DG Environ ment, MOCC 24.03.21 26.03.21 20.05.21 07.06.21	II DG Environ ment, CDA 24.03.21 26.03.21 20.05.21 07.06.21 Member-	Chief Environ ment, MO PD&R 24.03.21 26.03.21 06.04.21 Member -III	ul Islam Environ mental Expert 24.03.21 26.03.21 29.05.21 Mr. Zia	Environme ntal Sciences IIUI 24.03.21 26.03.21 20.05.21 07.06.21 Chairman, Dept. of		RC forwar ded to Propon ent 25.06.2 1	y to com ment s by RC 14.0 6.21	of PH 29.06.
medical waste incinerator Constituted on EIA Forwarded on Comments received on Reminders 1 Reminders 2 132 kw grid station sector g-9/3	I DG Environ ment, MOCC 24.03.21 26.03.21 20.05.21 07.06.21 Member-I DG	II DG Environ ment, CDA 24.03.21 26.03.21 20.05.21 07.06.21 Member-II DG	Chief Environ ment, MO PD&R 24.03.21 26.03.21 06.04.21 Member -III Chief	ul Islam Environ mental Expert 24.03.21 26.03.21 29.05.21 Mr. Zia ul Islam	Environme ntal Sciences IIUI 24.03.21 26.03.21 27.06.21 Chairman, Dept. of Environme		RC forwar ded to Propon ent 25.06.2 1 Comme nts by RC	y to com ment s by RC 14.0 6.21	of PH 29.06. 21
medical waste incinerator Constituted on EIA Forwarded on Comments received on Reminders 1 Reminders 2 132 kw grid station sector g-9/3 and its	I DG Environ ment, MOCC 24.03.21 26.03.21 20.05.21 07.06.21 Member-I DG Environ	II DG Environ ment, CDA 24.03.21 26.03.21 20.05.21 07.06.21 Member- II DG Environ	Chief Environ ment, MO PD&R 24.03.21 26.03.21 06.04.21 Member -III Chief Environ	ul Islam Environ mental Expert 24.03.21 26.03.21 29.05.21 Mr. Zia ul Islam Environ	Environme ntal Sciences IIUI 24.03.21 26.03.21 07.06.21 Chairman, Dept. of Environme ntal	AP, BU,	RC forwar ded to Propon ent 25.06.2 1 Comme nts by RC forwar	y to com ment s by RC 14.0 6.21 Repl y to com	of PH 29.06. 21 Date
medical waste incinerator Constituted on EIA Forwarded on Comments received on Reminders 1 Reminders 2 132 kw grid station sector g-9/3 and its feeding	I DG Environ ment, MOCC 24.03.21 26.03.21 20.05.21 07.06.21 Member-I DG Environ ment,	II DG Environ ment, CDA 24.03.21 26.03.21 20.05.21 07.06.21 Member- II DG Environ ment,	Chief Environ ment, MO PD&R 24.03.21 26.03.21 06.04.21 Member -III Chief Environ ment,	ul Islam Environ mental Expert 24.03.21 26.03.21 29.05.21 Mr. Zia ul Islam Environ mental	Environme ntal Sciences IIUI 24.03.21 26.03.21 20.05.21 07.06.21 Chairman, Dept. of Environme ntal Engineerin		RC forwar ded to Propon ent 25.06.2 1 Comme nts by RC forwar ded to	y to com ment s by RC 14.0 6.21 Repl y to com ment	of PH 29.06. 21
medical waste incinerator Constituted on EIA Forwarded on Comments received on Reminders 1 Reminders 2 132 kw grid station sector g-9/3 and its feeding transmissio	I DG Environ ment, MOCC 24.03.21 26.03.21 20.05.21 07.06.21 Member-I DG Environ	II DG Environ ment, CDA 24.03.21 26.03.21 20.05.21 07.06.21 Member- II DG Environ	Chief Environ ment, MO PD&R 24.03.21 26.03.21 06.04.21 Member -III Chief Environ ment, MO	ul Islam Environ mental Expert 24.03.21 26.03.21 29.05.21 Mr. Zia ul Islam Environ	Environme ntal Sciences IIUI 24.03.21 26.03.21 20.05.21 07.06.21 Chairman, Dept. of Environme ntal Engineerin g, UET,	AP, BU,	RC forwar ded to Propon ent 25.06.2 1 Comme nts by RC forwar	y to com ment s by RC 14.0 6.21 Repl y to com ment s by	of PH 29.06. 21 Date
medical waste incinerator Constituted on EIA Forwarded on Comments received on Reminders 1 Reminders 2 132 kw grid station sector g-9/3 and its feeding	I DG Environ ment, MOCC 24.03.21 26.03.21 20.05.21 07.06.21 Member-I DG Environ ment,	II DG Environ ment, CDA 24.03.21 26.03.21 20.05.21 07.06.21 Member- II DG Environ ment,	Chief Environ ment, MO PD&R 24.03.21 26.03.21 06.04.21 Member -III Chief Environ ment,	ul Islam Environ mental Expert 24.03.21 26.03.21 29.05.21 Mr. Zia ul Islam Environ mental Expert	Environme ntal Sciences IIUI 24.03.21 26.03.21 20.05.21 07.06.21 Chairman, Dept. of Environme ntal Engineerin g, UET, Taxila	AP, BU,	RC forwar ded to Propon ent 25.06.2 1 Comme nts by RC forwar ded to	y to com ment s by RC 14.0 6.21 Repl y to com ment s by RC	of PH 29.06. 21 Date

on						7	7	8.17	17
EIA						06.06.1			
Forwarded	06.06.17	06.06.17	06.06.17	06.06.17	06.06.17	06.06.1 7			
on						/			
Comments			27.07.17	12.06.17	05 07 17				
received on			27.07.17	12.00.17	03.07.17				
Reminders 1	20.07.17	20.07.17	20.07.17						
Reminders 2	31.07.17	31.07.17							
Hamdard University	Member-I DG Environ ment, MOCC	Member- II DG Environ ment, CDA	Member -III Chief Environ ment, MO PD&R	Evniron	Environme	Chairp erson, QAU, Isb	Comme nts by RC forawa rded to Propon ent	y to com	Date of PH
Constituted on	17.08.17	17.08.17	17.08.17	17.08.17	17.08.17	17.08.1 7	13.11.1 7	20.1 1.17	02.11. 17
EIA Forwarded on	18.08.17	18.08.17	18.08.17	18.08.17	18.08.17	18.08.1 7			
Comments received on		26.09.17		21.08.17	24.08.17				
Reminders 1	25.09.17	25.09.17	25.09.17			25.09.1 7			
NTDC	Member-	Member-	Member	Mr. Zia			Comme nts by	Repl	
project in/out of one circuit of 220 kw Mansehra	I DG	II DG Environ ment, CDA	Chief Environ ment, Mo PD&R	ul Islam Environ mental Expert	l hief Eng		RC forwar ded to Propon ent		Date of PH
in/out of one circuit of 220 kw	I DG Environ ment,	II DG Environ ment,	Chief Environ ment, Mo	ul Islam Environ mental Expert	Chief Eng,		RC forwar ded to Propon	com ment s by	
in/out of one circuit of 220 kw Mansehra Constituted	I DG Environ ment, MOCC	II DG Environ ment, CDA	Chief Environ ment, Mo PD&R	ul Islam Environ mental Expert	IESCO		RC forwar ded to Propon ent 24.10.1	com ment s by RC	of PH 26.12.
in/out of one circuit of 220 kw Mansehra Constituted on EIA Forwarded on Comments	I DG Environ ment, MOCC	II DG Environ ment, CDA	Chief Environ ment, Mo PD&R 04.10.17	ul Islam Environ mental Expert	04.10.17		RC forwar ded to Propon ent 24.10.1	com ment s by RC	of PH 26.12.
in/out of one circuit of 220 kw Mansehra Constituted on EIA Forwarded on Comments received on	I DG Environ ment, MOCC 04.10.17	II DG Environ ment, CDA 04.10.17	Chief Environ ment, Mo PD&R 04.10.17	ul Islam Environ mental Expert	04.10.17		RC forwar ded to Propon ent 24.10.1	com ment s by RC	of PH 26.12.
in/out of one circuit of 220 kw Mansehra Constituted on EIA Forwarded on Comments received on Reminders 1	I DG Environ ment, MOCC 04.10.17 06.10.17	II DG Environ ment, CDA	Chief Environ ment, Mo PD&R 04.10.17	ul Islam Environ mental Expert	04.10.17		RC forwar ded to Propon ent 24.10.1	com ment s by RC	of PH 26.12.
in/out of one circuit of 220 kw Mansehra Constituted on EIA Forwarded on Comments received on Reminders 1 Extension of	I DG Environ ment, MOCC 04.10.17 06.10.17	II DG Environ ment, CDA 04.10.17	Chief Environ ment, Mo PD&R 04.10.17 06.10.17	ul Islam Environ mental Expert	04.10.17 06.10.17		RC forwar ded to Propon ent 24.10.1	com ment s by RC 30.1 0.17	of PH 26.12.
in/out of one circuit of 220 kw Mansehra Constituted on EIA Forwarded on Comments received on Reminders 1	I DG Environ ment, MOCC 04.10.17 06.10.17 Member-I DG	II DG Environ ment, CDA 04.10.17 06.10.17	Chief Environ ment, Mo PD&R 04.10.17	ul Islam Environ mental Expert 04.10.17 06.10.17	04.10.17 06.10.17 Chairman, Dept. of Environme	Chairm an, WLMB	RC forwar ded to Propon ent 24.10.1 7	com ment s by RC 30.1 0.17	26.12. 17

on						0			
EIA						23.11.2			
Forwarded	23.11.20	23.11.20	23.11.20	23.11.20	23.11.20	0			
on						U			
Comments		11.01.20	07.01.21	26.11.20					
received on				20.11.20					
Reminders 1	11.01.21	11.01.21	11.01.21		11.01.21				
Metro Peshawar Morr	Member-I DG Environ ment, MOCC	Member- II DG Environ ment, CDA	Member -III Chief Environ ment, MoPD& R	AP, IIUI	Chairman, Dept. of Environme ntal Engineerin g, UET, Taxila	Chairp erson, QAU, Isb	Comme nts by RC forwar ded to Propon ent	y to com	Date of PH
Constituted on	20.04.17								
Gulberg greens farmhouse scheme	Member-I DG Environ ment, MOCC	Member- II DG Environ ment, CDA	Member -III Chief Environ ment, MoPD& R	ul Islam Environ mental	Chairman, Dept. of Environme ntal engineering , UET, Taxila		Comme nts by RC forwar ded to Propon ent	ment s by RC	Date of PH
Constituted on	07.12.18	07.12.18	07.12.18	07.12.18	07.12.18		27.03.2 019	02.0 4.20 19	25.06. 2019
EIA Forwarded on	11.12.18	11.12.18	11.12.18	11.12.18	11.12.18				02.11. 19
Comments		Yes		19 12 18	21.12.18				
received on		105		17.12.10	21.12.10				
Reminders 1 Technology Developmen t Park Project Chak Shahzad	Member-I DG Environ ment, MOCC	Member- II DG Environ ment, CDA	Member -III Chief Environ ment, MO PD&R		Chairman, Dept. of Environme ntal engineering , UET, Taxila		Comme nts by RC forwar ded to Propon ent	Repl y to com ment s by RC	
Constituted on	30.01.19						05.04.2 020	21.0 5.20 20	
EIA Forwarded on									
Comments received on	18.09.20	12.06.20	20.02.20	07.02.20					
Reminders 1	03.02.20	03.02.20			03.02.20				

Reminders 2	24.02.20	24.02.20		24.02.20		
Reminders 3	25.02.20	25.02.20		25.02.20		

Annexure-XVIII

Para No. 5.15

Sr. No.	Name of Project	Application Received	Committee of experts constitute
1	TEED (TE 11 1 G) ID D II'	07.07.2010	(EIA) (dated)
1	IEE Report of Taibah Steel Re-Rolling Mills	07.07.2018	Nil
2	M/s Siddique Steel Furnace I-9, Islamabad	12.11.2018	Nil
3	Amazon Mall DHA	18.06.2019	Nil
4	Asphalt Mixing Plant	01.08.2019	Nil

Annexure-XIX Para No. 5.16

	Description of Project	Location of Project	Date of	Approval
No.			receipt of	granted
			IEE / EIA	(Yes / No)
1	Sukh Chayn Residence	Plot No. 06 Sector F-16	13.7.18	Yes
	project at Plot No. 06	Markaz, Islamabad.		
	Sector F-16 Markaz,			
	Islamabad.			
2	Rahman Enclave Zone-4-		17.9.18	Yes
	B, Islamabad.			
3	Construction of PHA-F-	Sector I-16/3 Islamabad.	10.9.18	Yes
	Multistory Apartments At			
	Sector I-16/3 Islamabad.			
4	Construction of Gulberg	At Zone -IV-B,	11.7.18	Yes
	Greens Farms Housing	Islamabad.		
	Scheme (Revised &			
	Extended).			
5	Construction of PHA-F	Kurri Road, Islamabad	10.9.18	Yes
	Officer's Residencia			
6	Development of Sector I-	Sector I-15 Project	20.12.18	Yes
	15 Project Islamabad	Islamabad		
7	Construction of Gulberg	At Zone-V, Islamabad.	22.10.19	Yes
	Residencia Housing			
	Scheme (Revised &			
	Extended)			
8	Technology Park	Chak Shahzad, Islamabad	16.12.20	Yes
	Development Project Chak			

	Shahzad, Islamabad			
9	Construction of Housing	Mauve Area, Sector G-13	3.5.20	Yes
	Fountain Tower	Islamabad.		
10	Construction of Mall of	Mouza Lohi Bher, Zone-	19.5.20	Yes
	Arbia	V Islamabad.		
11	Traffic Management	Rawal Chowk and Park	6.11.20	Yes
	Solutions (TMS) for Rawal	Road, Islamabad.		
	Chowk and Park Road,			
	Islamabad.			
12	Construction of Amazon	Plot No. 36 Sector G-11	9.4.20	Yes
	Hotel	Islamabad.		
13	Construction of Rawalpindi		12.8.20	Yes
	Ring Road (Total Length	N-5 to Sangjani,		
	(65+800Km) (2KM in ICT	Islamabad.		
	Area).			
14	Extension of Extensive	At Pakistan Institute of	10.5.20	Yes
	Care Department of	Medical Sciences		
	Mother and Child Health	(PIMS), Hospital		
	Centre and Children	Islamabad.		
	Hospital, PIMS, Islamabad.			
15	Construction of New	Located at Sector I-11/2,	24.11.20	Yes
	132KV Gird Station	Islamabad		
16	Construction of Frequency	Located at Plot No. 13	12.7.20	Yes
	Allocation Board (FAB)	Mauve Area Sector G-8/1		
	Headquarters Monitoring	Islamabad.		
17	Station	A. A	14 10 00	*7
17	Construction of Gulf Floras		14.12.20	Yes
	Apartments	Street No. 2 Zone-04		
		East Garden City Bahria		
18	Construction of 11 Central	Town Zone-5 Islamabad At Plot No 25-A Sector	21.12.20	Yes
18		G-11/1 Islamabad	Z1.1Z.ZU	ies
19	Apartments Construction of The Fourth		24.12.20	Yes
19	Star Residence	98 Sector G-11/3	∠4.1∠.∠U	ies
	Star Kesiuence	Islamabad.		
20	Construction of IJP Road	At Faizabad Interchange	24.12.20	Yes
20	From Faizabad Interchange	to N-5 G.T. Road	∠ ¬ .1∠.∠∪	168
	to N-5 G.T. Road	Islamabad.		
21	Construction of Shifa	At Plot No.5 Sector F-11	1.12.21	Yes
1	Medical Center Islamabad	Markaz Islamabad.	1.12.21	105
	Project	THATRAZ ISTAITIAUAU.		
22	Construction of Pakland	New Blue Area, Sector	2.8.21	Yes
	Tower-II Project	G-9 Islamabad.	2.0.21	105
23	Installation of Operation of	At National Institute of	3.5.21	Yes
	and the second of operation of	1 20 1 tational motitate of	0.0.21	100

	Bio-Medical Waste Incinerator	Rehabilitation Medical (NIRM) Street No. 9		
		Sector G-8/2 Islamabad		
24	Construction of Session Division (East and west)	At Mauve Area, Sector G-11/4 Islamabad.	24.3.21	Yes
25	Naya Pakistan Housing Scheme Sangjani Islamabad.		30.3.21	Yes
26	Construction of Capital Icon Mall and Residency	At Mouza Lohi Bher, Islamabad Expressway, Zone-5 Islamabad.	16.4.21	Yes
27	Construction of Mall of Arabia	Extension of at Zone-5 Islamabad	30.4.21	Yes
28	Construction of Paradise City Housing Scheme	At Mouza Badhana Naugazi Zone-II Islamabad.	5.2.21	Yes
29	Establishment of Supreme Court Employees Cooperative Housing Society.	At Mouza Barkat and Mouza Naugazi at Sector G-171/2, Islamabad.	26.7.21	Yes
30	Dualization of Attaturk (west) from Khayabane Suharwarde to Khayabane Magalla	EIA	17.3.16	1.2.17
31	Metro Peshawar Morr	EIA	13.4.17	1.2.18
32	Tarnol Underpass Interchange	EIA	11.11.15	7.16.17
33	Technology Development Park Project Chak Shahzad	EIA	11.12.19	10.12.20
34	NIRM Bio-medical waste incinerator	EIA	14.3.21	16.8.21
35	Grade Separation Facility at Intersection of 7th Avenue	EIA	16.5.16	20.7.17
36	Gulberg greens farmhouse scheme	EIA	12.10.18	22.3.20
37	Traffic Management Solutions for Rawal Chowk and Park Road	EIA	21.5.20	23.12.20
38	Elysium Tower, Blue Area Islamabad	EIA	20.7.16	24.2.17
39	IJP Road Faizabad Interchange	EIA	24.12.20	24.9.21
40	132 kw grid station sector	EIA	24.5.17	25.8.17

	0/2 1: 6 1:	Ī		
	g-9/3 and its feeding			
	transmission line			
	Hamdard University	EIA	04.8.17	26.11.18
42	Extension of extensive care		30.9.20	29.7.21
	dept. of mother child health			
	Centre and children			
	hospital			
43	Golf floras apartments	EIA	14.12.20	31.5.21
	Projects, Garden city			
	Bahria Town Zone-V			
	L	ist of IEES Approved.		
1	Drilling of Tarnol-1 Well	Tarnol, Islamabad	13.9.21	Yes
	in Margalla Block			
2	Pak-Korean Testing	Islamabad		Yes
	Laboratory			
3	PIDE Campus	Sector H-11/2, Islamabad	11.11.18	Yes
4	Steel Furnace	Sector I-9, Islamabad	19.11.18	Yes
5	Steel Re-Rolling Mills	Sector I-9, Islamabad	19.11.19	Yes
6	One Expressway Corporate	Expressway, Islamabad	7.12.2018	Yes
	Office			
7	Tarnol Breeders	Tarnol, Islamabad	7.6.19	Yes
8	Asphalt Plant	Sector H-10, Islamabad	1.8.19	Yes
9	D-Tech Waste Solutions	Hummak, Islamabad	24.9.19	Yes
	Facility			
10	State Bank Building	Sector G-5, Islamabad	28.10.19	Yes
11	Housing Scheme	Zone-V, Islamabad	22.7.20	Yes
12	Building	Sector G-6 / F-6,	14.9.20	Yes
		Islamabad		
13	PARR-3	Nilore, Islamabad	2.11.20	Yes
14	Rehabilitation Centre	Hummak, Islamabad	16.2.21	Yes
15	Kingsley Arcade F-6	IEE	16.2.17	1.11.17
	MATRC (Model addiction	IEE	1.2.21	10.1.22
	treatment & Rehab Centre)			

Annexure-XX Para No. 5.16

Sr.	Name of Project	EIA /	Applicatio	Env. Approval
No.		IEE	n date	given
1	Dualization of Attaturk (west) from	EIA	17.03.2016	01.02.2017
	Khayabane Suharwarde to Khayabane			
	Margalla			
2	Metro Peshawar Morr	EIA	13.04.2017	01.02.2018
3	Kingsley Arcade F-6	IEE	16.02.2017	01.11.2017

4	Tarnol Underpass Interchange	EIA	11.11.2015	07.16.2017
5	Grade Separation Facility at Intersection		16.05.2016	20.07.2017
	of 7th Avenue			
6	Elysium Tower, Blue Area Islamabad	EIA	20.07.2016	24.02.2017
7	132 kwa grid station sector G-9/3 and its	EIA	24.05.2017	25.08.2017
	feeding transmission line			
8	Hamdard University	EIA	04.08.2017	26.11.2018
9	Construction of Underpass between G-7/			
	G-8			

Annexure-XXI Para No.5.17

Sr.	Name of Project	EIA /	Application	Env.
No.		IEE	date	Approval
				given
1	Dualization of Attaturk (west) from	EIA	17.03.2016	01.02.2017
	Khayabane Suharwarde to Khayabane			
	Margalla			
2	Metro Peshawar Morr	EIA	13.04.2017	01.02.2018
3	Kingsley Arcade F-6	IEE	16.02.2017	01.11.2017
4	Tarnol Underpass Interchange	EIA	11.11.2015	07.16.2017
5	Grade Separation Facility at Intersection	EIA	16.05.2016	20.07.2017
	of 7th Avenue			
6	Elysium Tower, Blue Area Islamabad	EIA	20.07.2016	24.02.2017
7	132 kwa grid station sector g-9/3 and its	EIA	24.05.2017	25.08.2017
	feeding transmission line			
8	Hamdard University	EIA	04.08.2017	26.11.2018
9	Construction of Underpass between G-			_
	7/ G-8			

Annexure-XXII Para No. 5.17

Sr.	Name of Project	EIA/	Application	Date of
No.		IEE	date	Approval
1	Siddiqui steel Billet Manufacturing	IEE	12.11.2018	12.03.2020
2	Taibah Steel Rerolling Steel mill	IEE	19.11.2018	08.08.2019
	One express way, Corporate office			
3	Building Project, Gulberg Greens	IEE	07.12.2018	10.02.2020
	Asphalt Mixing Plant, Sector H-10,			
4	Kashmir Highway, Islamabad	IEE	01.08.2019	12.09.2019
	D-Tech waste solution facility Hummak			
5	CDA, Industrial Triangle, Islamabad	IEE	24.09.2019	17.07.2020

Annexure-XXIII Para No. 5.18

Sr.	Name of Project	EIA /	Application	Date of
No.		IEE	date	Approval
1	Siddiqui steel Billet Manufacturing	IEE	12.11.2018	12.03.2020
	Traffic Management Solutions for Rawal			
2	Chowk and Park Road	EIA	21.05.2020	
			20.04.2016	
3	Naval Housing Scheme Zone-V	IEE	06.06.2016	
4	Taibah Steel Rerolling Steel mill	IEE	19.11.2018	08.08.2019
	One express way, Corporate office			
5	Building Project, Gulberg Greens	IEE	07.12.2018	10.02.2020
6	Amazon Mall DHA	IEE	18.06.2019	
7	Kingsley Arcade F-6	IEE	16.02.2017	
	Asphalt Mixing Plant, Sector H-10,			
8	Kashmir Highway, Islamabad	IEE	01.08.2019	12.09.2019
	D-Tech waste solution facility Hummak			
9	CDA, Industrial Triangle, Islamabad	IEE	24.09.2019	17.07.2020

Annexure-XXIV Para No. 5.18

Sr.	Name of Project	EIA /	Application	Date of
No.	, and the second	IEE	date	Approval
1	Siddiqui steel Billet Manufacturing	IEE	12.11.2018	12.03.2020
	Traffic Management Solutions for Rawal			
2	Chowk and Park Road	EIA	21.05.2020	
			20.04.2016	
3	Naval Housing Scheme Zone-V	IEE	06.06.2016	
4	Taibah Steel Rerolling Steel mill	IEE	19.11.2018	08.08.2019
	One express way, Corporate office			
5	Building Project, Gulberg Greens	IEE	07.12.2018	10.02.2020
6	Amazon Mall DHA	IEE	18.06.2019	
7	Kingsley Arcade F-6	IEE	16.02.2017	
	Asphalt Mixing Plant, Sector H-10,			
8	Kashmir Highway, Islamabad	IEE	01.08.2019	12.09.2019
	D-Tech waste solution facility Hummak			
9	CDA, Industrial Triangle, Islamabad	IEE	24.09.2019	17.07.2020