



Republic of the Philippines  
Department of Environment and Natural Resources  
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## MEMORANDUM

**FOR :** **THE DIRECTORS**  
Environmental Management Bureau  
Forest Management Bureau  
Mines and Geosciences Bureau  
Biodiversity Management Bureau  
Ecosystems Research and Development Bureau  
Lands Management Bureau  
National Water Resources Board  
Philippine Council for Sustainable Development

**FROM :** **THE UNDERSECRETARY**  
Finance, Information Systems and Climate Change Service

**SUBJECT :** **REQUESTING COMMENTS ON THE RECOMMENDATIONS  
FROM GREEN CONVERGENCE TO THE DRAFT NATIONALLY  
DETERMINED CONTRIBUTION (NDC)**

**DATE :** 01 February 2021

This has reference to the herein letter dated 29 January 2021 from Sec. Emmanuel de Guzman, Vice-Chair and Executive Director of the Climate Change Commission requesting the DENR's comments on the recommendations raised by the Green Convergence for consideration in the draft Nationally Determined Contribution (NDC).

We may refer you to environment-related issues which mentioned "*payment for environmental services (PES) to incentivize the protectors of the environment*" as one of the policy measures to be committed to the NDC to help meet our country's carbon reduction goals.

In this regard, we would highly appreciate receiving your comments on this and other recommendations not later than **3 February 2021** (c/o Mr. Albert Magalang thru email address: [aamagalang@denr.gov.ph](mailto:aamagalang@denr.gov.ph)) for immediate consolidation and submission to the CCC. We have attached a copy of the letter from the Green Convergence, for your reference.

For your urgent compliance.

  
**ATTY. ANALIZA REBUELTA. TEH**



29 January 2021

**SECRETARY ROY A. CIMATU**

Department of Environment and Natural Resources (DENR)  
Quezon City

Dear **Secretary Cimat**:

This refers to the letter of Green Convergence to the Climate Change Commission (CCC) dated 18 January 2021, providing comments and recommendations on the draft Nationally Determined Contribution (NDC).

In this regard, the CCC would like to solicit DENR's comments on the environment-related issues conveyed in the letter which is enclosed for your reference.

In light of the scheduled multi-stakeholder consultation on the NDC next week, may we request for your kind reply on or before 02 February 2021.

We gratefully appreciate your sustained cooperation and support to bringing the NDC process to a fruitful and meaningful conclusion

Thank you and best regards.

Very truly yours,

**EMMANUEL M. DE GUZMAN**  
Vice Chairperson and Executive Director  
Climate Change Commission

**S U R V I V E # 1 • 5 C T I V E**

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January 18, 2021

**HONORABLE CARLOS DOMINGUEZ**  
Chairperson  
Climate Change Commission  
Malacañang Palace, Manila

**Thru: Secretary Emmanuel de Guzman**  
Executive Director  
Climate Change Commission

**Cc : NDC Technical Working Group**

**Dear Sec. Dominguez:**

Thank you for being open to our recommendation that CCC postpone the submission of our country's National Determined Contribution (NDC) and for the 15 January 2021 CCC statement that the NDC Technical Working Group will consider the comments of stakeholders during the most recent 23 December 2020 consultation.

Green Convergence and our environmental allies would like to reiterate offering our assistance in coming up with a more ambitious NDC that will in the process direct our country towards regenerative sustainable development. Rest assured, you have our collaborative support and commitment to engage everyone to commit to this goal.

In line with this, we would like to request a complete copy of the NDC that the Climate Change Commission crafted and the respective plans of the different government agencies. This would allow us to understand and study the document more thoroughly and to enhance our recommendations. **We are aware of the limited time left. The prompt response from Climate Change Commission is sincerely appreciated.**

At this point though we would like to reiterate our recommendations, given in our previous letter, that the respective agencies can consider while drafting their updated inputs.

1. That we increase our ambition for renewable energy. The original NDC targets only 25,000 MW of RE by 2040. This seems low compared to the RE potential of the country of 94,438 MW (does not include solar yet) (IRENA, 2017). The values estimated by IRENA were consulted with DOE.

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2. That the government pronouncements must guide the NDC. Specifically, we recommend that the moratorium on coal projects include those already in the pipeline and not just those not yet approved or greenfield projects.

The President in his 4<sup>th</sup> SONA in July 2019 committed to fast track RE development to reduce the country's dependence on coal. Sec. Cusi of DOE also declared a moratorium on coal projects on October 27, 2020. The "Carbon Tracker" which analyzes the carbon data of countries says that this important statement by DOE will reduce our carbon footprint by 60 MT CO<sub>2</sub>e leading to the reduction of our footprint by 32-35% by year 2030 (Climate Action Tracker, 2020). Further it assessed that the reduction will only happen if the 8,000 MW to 10,000 MW of coal projects in the pipeline will fall under the moratorium.

However, during the consultation of Dec. 23, 2020, DOE stressed that only the new projects will be stopped. This means that we lose the opportunity of reducing our footprint by 32-35%. This is ironical since we are targeting to reduce our country's footprint by almost the same amount.

**In other words, the government plans to reduce emissions by 30%. But the new coal plants now in the pipeline will produce 8-10K MW which is equivalent to 35%, negating the planned reduction!**

We understand that RE cannot go up to 100% immediately and that we need a transition fuel to also take care of our economy. We believe that there are other sources of baseload power available that are not as carbon -intensive as coal projects. These are hydropower, geothermal and natural gas technology options. The natural gas is considered as a transition fuel and energy backbone by many international institutions (IEA & IRENA, 2017 and WEC, 2019).

3. That all sectors give a full accounting of their energy use so that DOE can, disaggregate into projects which can be considered conditional (external support needed) and unconditional (cost defrayed by the Philippines itself). Integration should be done in the economy wide modelling which optimizes and rationalizes inputs.
4. That the following policy measures be committed in the NDC to help us meet our carbon reduction goals. They will also serve as safeguards to ensure that carbon reduction will really happen:
  - energy transition policy;
  - carbon standards and carbon pricing;

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- payment for environmental services to incentivize protectors of the environment; and
  - energy mix adhering to the principle of “Energy Trilemma” developed by the World Energy Council that espouses for the criteria consisting of energy security, energy equity and environmental sustainability.
5. That we do not include environmentally threatening technologies into our energy mix, specifically the following:

- Nuclear – It is extremely expensive, a huge threat because of our location in the geologically unstable part of the globe and cause radioactive pollution in its standard operations, and more so in case of accidents. Furthermore, the problem of storage of nuclear waste is a global issue because there is no repository that has been identified. Worldwide, nuclear energy use is in decline. Most of all, we have tremendous renewable energy potential. These are safe, indigenous, cheaper, extremely superior when it comes to value for money.
- Waste-to-Energy (WTE) - No WTE facility in the world does not emit the most toxic of substances, dioxins. In addition, burning waste destroys precious materials that can go back to the materials cycles through recycling and composting. Since it requires waste for its operation, people will not be encouraged to reduce waste. Some countries actually import waste for such facilities. It is likewise among the most expensive means of producing energy.

We would at this point also wish to recommend that the Department of Agriculture plan for transition to the organic, regenerative methods of producing food. Nitrous oxide from fertilizers is a huge contributor to the greenhouse gases. Chemically damaged soil has been shown to be a carbon source while organic soil is a carbon sink.

We would like to underscore our dedication to a more ambitious plan for our country, that we aim for climate neutrality by 2050. This vision was crafted from a series of dialogues that Green Convergence organized last year. We thought that the country needed to make a quantum leap with regard to the climate issue. We know that as a developing country, we are not obligated to take giant steps required of advanced nations. However, we also know that by pursuing this goal, we will also arrive at programs that are environmentally, economically and

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socially beneficial for our people. We would like to enjoin the CCC and the Philippine government to adopt this dream too. To achieve it, we need a whole-of-nation approach, with the public and private sectors and civil society united in love for our country.

Thank you and we hope that our recommendations will be given attention in your deliberation of the final NDC. Again, we are aware of the limited time left. The prompt response of Climate Change Commission's is truly appreciated.

Thank you. God bless our efforts.

Sincerely yours,

**ANGELINA P. GALANG, Ph. D. (sgd.)**

President

Green Convergence for Safe Food, Healthy Environment and Sustainable Economy

Personal cellphone: 09178538841

References:

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