



Republic of the Philippines  
Department of Environment and Natural Resources  
Visayas Avenue, Diliman, Quezon City 1116  
Tel Nos. 9296626 to 29 ; 9296633 to 35  
Website <http://denrgov.ph>

**MEMORANDUM**

**TO :** **THE DIRECTOR EMB**  
In concurrent capacity as OIC, Assistant Secretary  
Luzon and Visayas

**THE DIRECTOR, BMB**  
In Concurrent Capacity, Asst. Secretary for  
Policy, Planning and Foreign-assisted and Special Projects

**THE OIC DIRECTOR**  
Mines and Geosciences Bureau

**THE REGIONAL EXECUTIVE DIRECTOR**  
Regions 1-8, NCR and CAR

**FROM :** **THE UNDERSECRETARY**  
Field Operations Luzon, Visayas and Environment

**SUBJECT :** **REQUEST FOR COMMENTS ON THE POSITION PAPER  
PROPOSING TO REDEFINE THE GOVERNMENT POLICY ON  
RECLAMATION PROJECT IN MANILA BAY FROM MR.  
ENRIQUE K. RAZON**

**DATE :** MAY 29 2023

This refers to the memorandum dated 19 May 2023 from Undersecretary Augusto D. dela Peña requesting for comments and inputs on the Position Paper submitted by Mr. Enrique K. Razon to the Office of the Excellency President Ferdinand R. Marcos, Jr., transmitted through a letter dated 10 April 2023 addressed to the Honorable DENR Secretary.

May we refer the matter for your appropriate action. Furnish this Office of the actions taken citing document tracking number DENRCO-ASRMD- 2023-010207 for record and monitoring purposes.

For compliance.

  
ATTY. JUAN MIGUEL T. CUNA, CESO I

c.c.

Office of the Undersecretary for Organizational  
Transformation and Human Resources

MEMO NO. 2023 - 461



**Republic of the Philippines**  
**Department of Environment and Natural Resources**  
Visayas Avenue, Diliman, Quezon City  
Tel Nos. 929-6626 to 29; 929-6633 to 35  
929-7041 to 43; 929-6252; 929-1669  
Website: <http://www.denr.gov.ph> Email: [web@denr.gov.ph](mailto:web@denr.gov.ph)

**MEMORANDUM**

**FOR :** **The Undersecretary**  
Field Operations – Luzon, Visayas, and Environment

**The Undersecretary – Legal and Administration and  
Supervising Undersecretary - Biodiversity Management  
Bureau**

**The Undersecretary**  
Integrated Environmental Science

**The Undersecretary**  
Policy, Planning, and International Affairs.

**FROM :** **The Undersecretary and Officer-in-Charge**  
Office of the Chief of Staff

**SUBJECT :** **POSITION PAPER FROM MR. ENRIQUE K. RAZON  
PROPOSING TO REDEFINE THE GOVERNMENT'S  
POLICY ON RECLAMATION PROJECTS IN MANILA  
BAY**

**DATE :** **MAY 19 2023**

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Respectfully referred, for information and appropriate action, is the attached letter from Undersecretary and Chief of Staff Atty. Leonardo Roy A. Cervantes of the Office of the Executive Secretary, Office of the President, requesting advice on the action taken by the DENR regarding the enclosed Position Paper from Mr. Enrique K. Razon relative to the reclamation projects in Manila Bay.

This is to request the Undersecretary for Field Operations – Luzon, Visayas, and Environment, Undersecretary for Legal and Administration and Supervising Undersecretary for Biodiversity Management Bureau, and Undersecretary for Integrated Environmental Science to review said position paper and submit comments/recommendations to the Office of the Undersecretary for Policy, Planning, and International Affairs for consolidation and drafting of a reply to the Office of the Executive Secretary for the approval and signature of the DENR Secretary.

For urgent compliance.

  
**AUGUSTO D. DELA PEÑA**

**ATTACHMENTS:**

<b>A</b>	Memorandum dated 28 April 2023 from the Office of the Undersecretary for Field Operations Luzon, Visayas and Environment
<b>B</b>	Letter dated 20 April 2023 from Atty. Leonardo Roy A. Cervantes, Undersecretary and Chief of Staff from the Office of the Executive Secretary
<b>C</b>	Position Paper of Mr. Enrique K. Razon, Jr. proposing to redefine the Government's policy on reclamation projects in Manila Bay



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**MEMORANDUM**

**FOR : THE UNDERSECRETARY**  
Policy, Planning and International Affairs

**FROM : THE UNDERSECRETARY**  
Field Operations Luzon, Visayas and Environment

**SUBJECT : ENDORSING THE POSITION PAPER OF MR. ENRIQUE K. RAZON TO REDEFINE THE GOVERNMENT POLICY ON RECLAMATION PROJECTS IN THE MANILA BAY**

**DATE : APR 28 2023**

This refers to the letter dated 20 April 2023 from Atty. Leonardo Roy A. Cervantes, Undersecretary and Chief of Staff from the Office of the Executive Secretary regarding the abovementioned subject.

May we refer the matter to your Office for your appropriate action. Furnish this Office of your recommendations and comments on the said proposal citing document tracking number DENRCO -ASRMD 2023-010207 as basis of our next course of action.

For consideration.

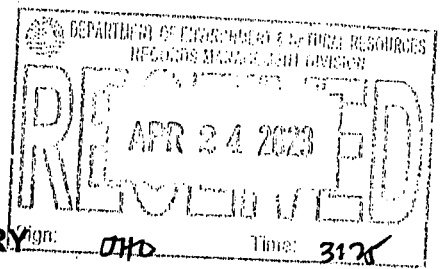
  
**ATTY. JUAN MIGUEL T. CUNA, CESO I**

c.c.

Office of the Secretary

Atty. Leonardo Roy A. Cervantes  
Undersecretary and Chief of Staff  
Office of the Executive Secretary

Office of the President  
of the Philippines  
Malacañang



OFFICE OF THE EXECUTIVE SECRETARY

20 April 2023

**SECRETARY MARIA ANTONIA YULO – LOYZAGA**  
Department of Environment and Natural Resources (DENR)  
Visayas Avenue, Diliman, Quezon City

Dear **Secretary Loyzaga**:

This refers to the attached letter dated 11 April 2023 from Mr. Enrique K. Razon submitting a position paper proposing to redefine the Government's policy on reclamation projects in the Manila Bay.

Upon the President's directive, may we transmit the attached communication for the Secretary's information and appropriate action.

This Office highly appreciates receiving advice on the action taken by the DENR concerning this matter.

Thank you.

Sincerely,

**ATTY. LEONARDO ROY A. CERVANTES**  
Undersecretary and Chief of Staff

**ENRIQUE K. RAZON, JR.**

April 11, 2023

His Excellency,  
Ferdinand R. Marcos Jr.  
President of the Republic of the Philippines  
Malacañang Palace  
Manila

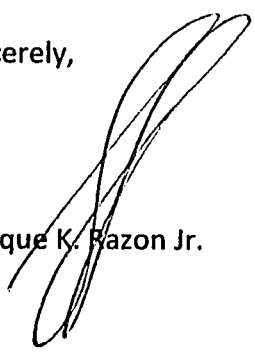
Dear Mr. President,

Attached is a paper on the Manila Bay reclamation projects. These projects are being undertaken with no master plan whatsoever and are a helter skelter patchwork of unchecked development that all feed into the same coastal road network, namely Roxas Boulevard. There is no other purpose for these reclamation projects other than malls, condos, and office buildings.

I hope this is useful and helps the President in your review of these projects.

Sincerely,

Enrique K. Razon Jr.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke, positioned to the right of the typed name.

## **Redefining the Government Policy on Reclamation in Manila Bay**

A quarter of the population in the Philippines resides within the Manila Bay catchment area that generates 53% of the country's Gross Domestic Product (GDP). Despite the immense ecological, economic, cultural, historical and aesthetic values of the Manila Bay, its sustainability is under serious challenge.<sup>1</sup> Massive land reclamation which will reshape the face of Manila Bay is one such challenge. It will have irreversible consequences on the economy and the environment when concerns are not addressed properly and studied adequately.<sup>2</sup> Manila Bay is so important that it is the subject of a novel continuing *mandamus* from the Supreme Court ordering DENR and other government agencies to clean it up, rehabilitate and restore it.<sup>3</sup>

The Manila Bay Sustainable Development Master Plan (MBSDMP) prepared under the National Economic Development Authority (NEDA) advise the need for inputs from appropriate experts/resource persons before government takes appropriate course of action relating to large land reclamation projects in Manila Bay.

Despite the well-publicized opposition by President Rodrigo Duterte to reclamation projects in Manila Bay, reclamation projects were still approved by several agencies of government. The various LGUs along Manila Bay are racing to sponsor their own reclamation projects to expand their land area. The process of approving reclamation projects has not been transparent. The serious concerns raised by oppositors, including Sen. Cynthia Villar, were not addressed.

The LGU's and Reclamation Projects Proponents claim the following benefits:

1. Response to population growth;
2. Expand land area for business center and housing;
3. Provide jobs;
4. Provided added revenue to Government (through its government share).

The Oppositors warn of catastrophic effects of Reclamation Projects (more extensively enumerated in Annex "C") including:

- a. Destruction of marine environment;
- b. land subsidence;
- c. storm surge;
- d. liquefaction;
- e. loss of livelihood of fisherfolks.

It is the government which must decide which of these two hands will become government policy.

The drivers of most of these massive reclamation projects are towering condominium projects, new malls, more office buildings. But don't we have enough condos, malls and office buildings facing Manila Bay now? Why do we want to build more? Who are we building these for? Even the financial capability of some reclamation project proponents are questionable. It appears that their intent is merely to pre-sell real estate or condo units in these reclamation projects.

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<sup>1</sup> Introduction, Page 4, Manila Bay Sustainable Development Master Plan, Manila Bay Area Situation Atlas, December 2018.

<sup>2</sup> *Ibid.* The extent of the current and proposed reclamation projects is shown the DENR maps attached as Annex "A" and Annex "B".

<sup>3</sup> MMDA et al. v. Concerned Residents of Manila Bay, et al. G.R. No. 171947-48, Dec. 18, 2008.

These are purely money making schemes without any new economic value added in terms of diversifying the economy. All these reclamation projects feed into one road -Roxas Boulevard- which is already congested and beyond its traffic capacity.

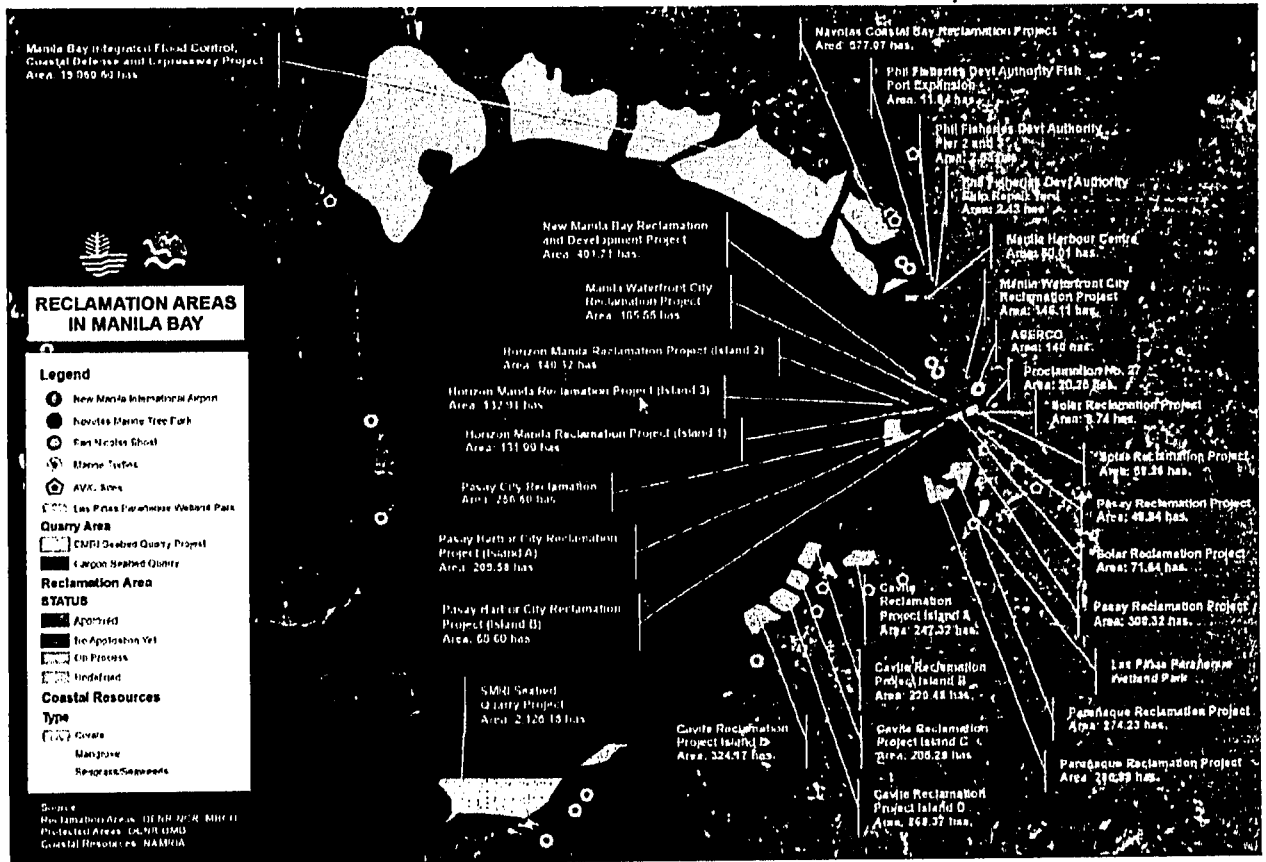
There is no official government study to show that there is market for more land, more condos, more malls, more buildings that the new reclamation projects will create. NEDA does not have data or study on the economic contribution of completed reclamation projects in the country.<sup>4</sup> In the absence of such official government data and study, the projected benefits of these massive reclamation projects are mere opinions of the LGU Sponsors and Project Proponents that government must validate.

**RECOMMENDATION:**

Following the prudential principle to avoid a threatened environmental catastrophe, Government should halt the massive reclamation in Manila Bay until NEDA, DENR and DOF have thoroughly studied the effects of these projects. NEDA, DENR and DOF must have science-based data to support a Government decision that: a) the benefits of these reclamation projects outweighs their deleterious effects; b) their approval processes have been reviewed for compliance with all applicable laws and procedures, and c) there will be sufficient mitigants to avert an environmental catastrophe from these projects.

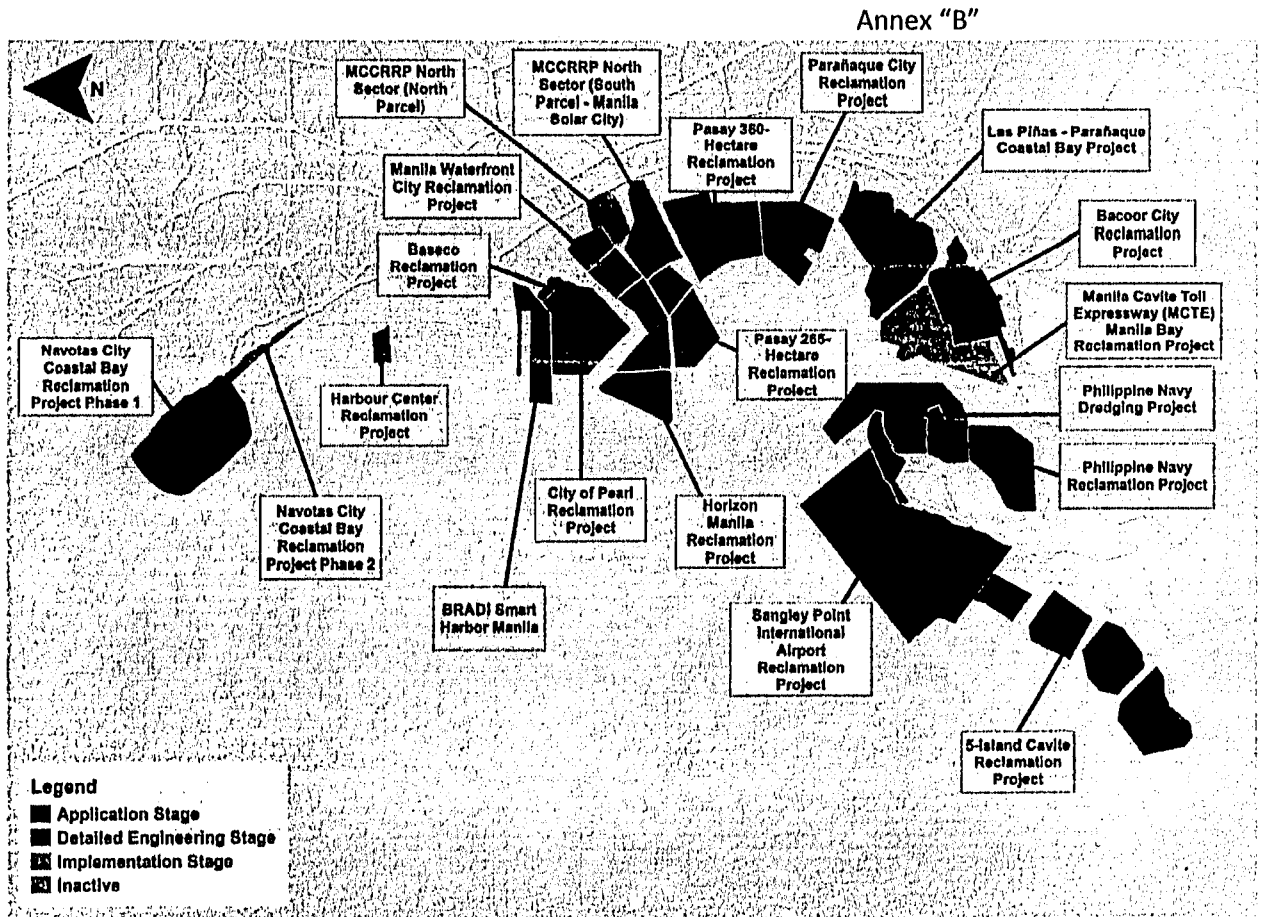
**Maps of current Manila Bay Reclamation Projects:**

Annex "A" May 2022 – DENR



<sup>4</sup> Per response of NEDA to an FOI inquiry made by *Rappler*, as reported in "Philippine reclamations: Spreading, posing dangers" posted in *Rappler* on Sept. 2, 2022.





Annex "C"

**Possible Disastrous Effects of Manila Bay Reclamation**

**A. Environmental**

1. Geological hazards including:
  - a. Storm Surges: Large-scale dump-and-fill projects have changed the movement and flow of the waters resulting to stronger and higher rush of seawater toward the coast.
  - b. Massive Flooding: Buildings and other structures in the filled land obstruct the passage of floodwaters and the natural channels that divert water. This will increase and prolong the effects of flooding. Numerous river systems drain into Manila Bay. When the natural drainage of rivers is constricted, flood waters take longer to recede.
  - c. Liquefaction: This happens to reclaimed land where loosely packed land lose their strength. During an earthquake, the layers below the surface liquefy like water and structures collapse on it.
  - d. Land Subsidence: The sinking of the earth can worsen the effects of flooding in local communities. Many areas in Metro Manila, Cavite, and Laguna are already experiencing this.
2. Wetlands: These prevent shoreline erosion, absorb pollutants, improve water quality, and provide habitat for animals and plants. Out of the 84,451 hectares of wetlands in

Manila Bay, only 20,404 hectares remain. This drop in number represents a 71.1% decimation of wetland areas.

3. Dumping of soil in Manila Bay will affect the turbidity of the water which can affect the primary production and survival of larval fish. The bay is a premier fishing ground. Commonly caught fishes include sardines, mackerel, mullet, threadfin bream, squid, blue crab, round scad, and fusilier.
4. The productivity of Manila Bay is dependent on coastal marine ecosystems, such as mangrove forests and adjacent estuarine ecosystems. Adverse impacts on mangrove forests will affect the fisheries production of the entire bay and the livelihood of the fisherfolk that depend on its bounty, especially those in neighboring towns. Mangroves also protect the coast from waves and typhoons.
5. Waterbird: 60% of all waterbird species in the Philippines including 12 globally threatened species are at risk because they occur within proposed reclamation areas in Manila Bay.
6. Will involve seabed quarrying, or massive dredging of sand beneath the sea in Manila Bay, including those in Cavite, Bataan and Pampanga, for the filling materials.
7. Construction activities might lead to "major incidents causing spillages/leakage of dredged materials and hydrocarbon fuels".
8. Deterioration of ambient air quality (due to fugitive dust emissions and notably PM10) resulting from earthworks / land formation activities and operation of construction equipment.
9. GHG (Greenhouse gas) emissions will principally occur through the use of materials, from the transport of those materials and waste to and from the site, and from the use of construction plant.

#### B. Socio-Economic Impact

1. Displacement of fisherfolk not just in the Manila Bay area but neighboring towns like Cavite, Bulacan, Bataan, Batangas.
2. Dump-and-fill projects will expose Metro population to life-threatening geological hazards and increase their vulnerability to disasters in the middle of the climate crisis.
3. The destruction of Manila Bay's marine ecosystem threatens the stability of our food supply. If fish supply collapses, species higher up on the food chain — including humans — will be adversely affected.
4. More environmental stresses: An increase in urban areas result to increased demand for water, more waste to be treated or disposed, and general increase in pollution.

#### Sources:

1. <https://businessmirror.com.ph/2022/02/27/reclamation-projects-in-manila-bayenvironmental-impacts-vs-econ-benefits/>
2. <https://www.philstar.com/headlines/climate-and-environment/2022/11/27/2226812/manila-bay-losing-its-marine-life-due-land-reclamation>
3. <https://narod-eco.medium.com/policy-brief-manila-bay-reclamation-and-its-impacts-on-the-people-and-environment-67a7fd7cea55>
4. <https://www.smartcitiesdive.com/ex/sustainablecitiescollective/unsustainable-truth-about-land-reclamation-worsening-impacts-manila-bay-r/1271899/>
5. [https://ph.oceana.org/wp-content/uploads/sites/16/dump\\_and\\_fill\\_brochure.pdf](https://ph.oceana.org/wp-content/uploads/sites/16/dump_and_fill_brochure.pdf)