



“Highest possible climate ambition, substance and compliance”

STATEMENT OF PHILIPPINE CIVIL SOCIETY ORGANIZATIONS AND NETWORKS ON CALLS AND RECOMMENDATIONS FOR THE FIRST NATIONALLY DETERMINED CONTRIBUTION TO THE UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE

15 February 2021

The finalization and submission of the Nationally Determined Contributions (NDC) for the Philippines is vital to achieve sustainable development, where no one is left behind. Despite playing a pivotal role in the adoption of the Paris Agreement in 2015, the country is one of the few Parties yet to submit its first climate pledge; this is a situation that the Philippine government aims to rectify as it is currently spearheading the finalization of the NDC, targeting the end of February 2021 for its long-awaited submission to the UNFCCC.

On 3 February, the Philippine government presented its second draft of the NDC to non-government stakeholders, where it now commits to a 75% reduction in GHG emissions between 2020 to 2030, compared to the business-as-usual (BAU) scenario for the same period. This is higher than the target in the previous draft, a 30% reduction target by 2040. It also expresses for the year 2030 to be its target for said emissions to peak, before decreasing as part of a less-pollutive development pathway by 2050.

While we welcome the higher GHG emissions reductions target, there still remains significant issues and challenges regarding the NDC draft, which continues to resemble a document seemingly focused more on compliance than substance. Given this context, the following are our calls and serious admonitions to the CCC and the government agencies regarding the finalization and submission of the Philippines' first NDC:

1. While the higher overall GHG emissions reduction target in the latest NDC draft (currently at 75%) is welcomed, such a massive increase in the figures from the previously-presented text necessitates adequate disclosure on the technical considerations and calculations that led to these figures. This, in fact, has been a constant concern for Philippine civil society throughout its engagements with national government agencies during the NDC development process. While maintaining a minimalistic draft text may allow government agencies more flexibility in fully determining the economy-wide implications of the NDC and reduce the risk of sanctions in the case of failure to deliver on its commitments, the Filipino nation, as stakeholders to the climate crisis, has the right to be consistently informed about these developments. **Moving forward, we call for more consistent modes and spaces for meaningful communications and engagements with the Climate Change Commission, the Department of Finance, and other sectoral agencies involved in the NDC development process, and subsequent phases of implementation, updating, monitoring, review, and validation.**
2. While we welcome the increase in the overall GHG emissions reduction target to 75% from 2020-2030, compared to the 30% target initially presented during the 23 December consultation, the country's unconditional target only increased from 2% to 2.71%, which almost makes it negligible. **Given reports of specific policies and measures from multiple sectors committed by agencies to be unconditional, we seek clarification regarding the calculation of the share of unconditional and conditional commitments in the NDC.** That said, the 72.29% conditional commitments signifies the intent to use the NDC as a tool for negotiating for the means of implementation necessary to implement the measures and policies under the PAMS list, including access to available modes of finance such as the Green Climate Fund. **This, however, does not mean that public finance should not be maximized for the country to strengthen its own infrastructures and systems to enhance its long-term resilience to the impacts of the climate crisis.**
3. During the 3 February consultation, specific sectoral policies and measures were presented. However, we disagree with the decision to not include these in the draft text. It is difficult for non-government stakeholders to assess the true impact of these measures when they are only presented during the consultation itself, especially those that will have implications at the local level. Aligned with national efforts for the highest possible ambition, **we call that specific policies and measures within the AWITFE (Agriculture, Waste, Industry, Transportation, Forestry and Energy) sectors, strategies covering cross-cutting issues, and associated technical and financial details must be reflected in the NDC, as it would further show the country's strong commitment and confidence in addressing the climate emergency.**

4. **We emphasize that all measures to be included in the final NDC must ensure that the benefits of these measures, climate-related or otherwise, would not only be felt by a select few sectors at the expense of the Filipino public.** The NDC must reflect a moral imperative for the Philippines, as one of the countries at highest risk to the impacts of the climate crisis, through a coherent, collaborative, and inclusive framework with ambitious commitments and targets and a clear sense of urgency in implementing its policies and measures. **Championing climate justice and just transition must always be at the forefront of Philippine climate policy and action,** by ensuring that local communities and the most vulnerable sectors will not be adversely affected by any part of the NDC process, from planning to monitoring and eventual updating, that no one is harmed or left behind.
5. During the previous multi-stakeholder consultation, it was mentioned that the interlinkages among the AWITFE sectors have not been fully integrated into the calculations and proposed actions for climate change mitigation and adaptation. Without accounting for these factors, the proposed NDC is at high risk of becoming more sectoral than economy-wide, undermining the country's pursuit of climate justice and sustainable development. Thus, **we call once more for the integration of the interlinkages between climate change mitigation options and cross-cutting issues with implications on enhancing adaptation, such as poverty alleviation, gender, health, education, biodiversity loss, green recovery from the COVID-19 pandemic, and youth development into the finalized first NDC, reflected in quantitative targets and timelines.**

Agriculture

1. The Department of Agriculture (DA) must prioritize policies and measures to enable a shift to agro-ecology/**organic agriculture**, which can enhance sequestration of CO₂, reduce emissions of other greenhouse gases, restore and improve soil quality for a more sustainable agricultural sector, and provide best practices (e.g. crop diversification, strengthened agro-ecosystems) leading to enhanced adaptive capacities of farming communities.
2. Aligned with the intent for an economy-wide approach in the NDC, the DA and the Department of Environment and Natural Resources (DENR) must lead in **strengthening participation and synergies** among government units, civil society and other stakeholders involved in agricultural production and environmental conservation and management to optimize the climate change mitigation and adaptation co-benefits and improve the conditions in the sector. This includes the **protection of agricultural areas from potential land use changes**, which threatens the country's food security, the capacity of its lands for CO₂ sequestration, and increases the vulnerability of the farmers' sector, already considered as one of the poorest in the nation. For the fisheries sectors, mangrove restoration, which is important for CO₂ sequestration as part of the forestry sector, also has co-benefits for sustainable fish production. This may be complemented by measures such as improved protection, conservation, and management of Marine Protected Areas, conversion of unutilized or abandoned fishponds, and revisiting guidelines for land reclamation projects.
3. While some policies and measures need to be conditional for proper scaling up and implementation, strategies proposed to be included in the NDC that are **already being implemented** by the DA should be **unconditional**.
4. Concerned government agencies should lead in transitioning the country's food systems into **more self-sufficient, consumer-friendly models** that promote **localized food production**, reducing the need for importing products, and reduces waste generated throughout its life-cycle, effectively reducing the sector's carbon footprint.
5. The NDC must contain concrete actions on how local government units and local farmers and fisherfolk would be allotted **adequate financial and technical support**, including access to technology, whether to extension services or technology transfer, and provided with opportunities to build their capacities to effectively translate policies and measures proposed to be included in the NDC from the national to the regional and local levels.
6. Despite the perceived lack of high GHG mitigation potential, the **fisheries sector** must become a more integral part of the climate change mitigation strategies for agriculture, especially if the DA plans to set conditional commitments for many of its policies and measures. **We recommend the inclusion of the following mitigation measures into the NDC:**
 - **Deployment of non-motorized bancas;**
 - **Use and deployment of payaos and other low-input, fuel-efficient Fish Aggregating Device (FADs); and**
 - **Restricting the use of halogen and metal highlights in superlights in fishing, to increase energy efficiency and reduce carbon footprint**
7. Aligned with the country's pursuit of climate justice, **workers in the farming and fisheries sectors must be provided with the adequate low-carbon technologies, financial support, and capacities to implement climate-smart agriculture policies and measures with mitigation co-benefits at the local level.** By enabling them to implement measures such as fish catch monitoring and stock assessments, use of solar panels in cold storage facilities, and use of windmills, most of which are *already* being conducted, it enhances the resilience of the sector to potential climate-related shocks that is necessary to alleviate many of its workers out of poverty

and revitalize agriculture in the Philippines.

Waste and Industry

1. **We oppose the inclusion of thermal-based waste-to-energy technologies in the Philippine NDC**, not only due to their degree of emissions intensity, but they may also downplay the attainment of the key goals of existing environmental laws such as RA 9003 (Ecological Solid Waste Management Act of 2000), especially in terms of promoting practices and measures aligned with a zero-waste society and a circular economy, and discouraging excessive consumeristic practices.
2. The **implementation of existing laws and policies** related to promoting ecological solid waste management and sustainable industries must be **strengthened**, as they not only play a vital role in strengthening the realization of the goals of the Philippines's climate pledge, but also provide modalities for translating NDC policies and measures into the local level. They are also integral for a shift to a circular economy, which also results in lower GHG emissions; this takes into account different types of wastes, including food waste, plastics, and electronic waste. This includes a **more consistent reporting of LGUs** on the implementation of their respective solid waste management plans, which provides the necessary data for calculating the GHG mitigation targets for this sector.
3. **We seek an emphasis on nutrient recovery among the currently-proposed policies and measures for the waste sector relating to wastewater treatments.** Aside from strengthening strategies in shifting to a circular economy, this policy direction also provides benefits to other sectors, most notably the agriculture sector through the production of more environmentally-friendly fertilizers that contributes to enhancing its adaptation capacities.
4. Given the Philippines's problem with managing plastic pollution, the **phaseout of single-use plastics** must be included as part of the measures for the waste sector in the NDC. This course of action would help the country achieve its goals for GHG emissions avoidance through avoiding the need to manufacture and recycle these materials, and further aid in translating the NDC into LGUs, many of whom already have existing ordinances banning single-use plastics.

Forestry

1. The absence of the forestry sector in the NDC draft is unacceptable. Using the justification that this sector is a net-sink in contrast to the rest of the AWITFE sectors being net-emitters is flawed because **not only does this disregard the fact that the 75% GHG emissions reductions target relies on emissions avoidance as much as reductions, but it also ignores the need to look at all these sectors through an economy-wide approach such that the forestry sector can help offset emissions from other sectors.** Considering that the Philippine government recognizes adaptation as an anchor strategy for climate action, which is central to the narrative within the NDC, the exclusion of the forestry sector means the exclusion of the immense benefits of the sector to communities and ecosystems alike in terms of climate change adaptation and other facets of sustainable development.
2. Furthermore, there are other ways to include forestry in the NDC without necessarily lumping it with the rest of the AWITFE sectors, as seen in the updated submissions of other Parties to the Paris Agreement in recent years. The current state of the forests and biodiversity of the Philippines are still far from their state decades ago, which justifies the need for scaling up solutions for the protection, conservation, and management of these areas. **Given its nature as a climate pledge focusing on climate change mitigation, we call for the inclusion of the forestry sector into the NDC and make it more aligned with the planned economy-wide approach.**
3. The NDC serves as an opportunity for the Philippines to **mainstream the development and implementation of nature-based solutions for the following decades**, as it provides an indigenous, more cost-effective approach to various aspects of climate change mitigation, adaptation, enhancing resilience, and sustainable development at the national and local levels. Referring to the list of priorities presented by DENR Usec. Annaliza Teh during the 23 December multi-stakeholder consultation, **we propose the inclusion of the following policies and measures in the NDC as part of the forestry sector:**
 - coastal and marine ecosystems management;
 - protected area development and management;
 - implementation of REDD+ and access to results-based financing;
 - forest protection, restoration and watershed rehabilitation;
 - upscale existing agroforestry practices into climate-smart agroforestry;
 - capacity-building activities on ecosystem and watershed management planning;
 - development of constructed wetlands for water quality and flood management;
 - improving green parks and recreation areas at highly urbanized areas; and
 - development of mangrove for biodiversity conservation towards ecotourism.

Energy and Transport

1. The Department of Energy declared a coal moratorium in October 2020, yet the entry of “highly efficient coal technologies” is still included in its list of policies and measures. Coal simply has no place in any decarbonization pathway aligned with a 1.5°C-warmer world. We must stop using the Philippines’s status as a low GHG emitter as an excuse to not say no to coal. With this context, **we demand for the exclusion of any new coal-fired power plants into the Philippine energy system and a stop to favoring fossil fuels as an emphasis of the DOE’s policy direction; instead raising the country’s ambition in developing renewable energy resources must be prioritized as the key to its long-term energy security.**
2. It is improbable for the Philippines to achieve its aspirational target of a peaking year by 2030 if there is no strong policy direction to prevent more coal plants from entering its power sector. **We demand for a peaking of coal emissions on or before 2030**, aligned with global efforts for a net-zero world by 2050.
3. The implementation of RA 9513 (Renewable Energy Act of 2008) is key to achieving the decarbonization of the Philippine energy sector. However, many of its mechanisms have been delayed in their enforcement for more than a decade since the law’s enactment, which in turn could affect the attainment of the sector’s goals through the NDC. **We call for a more effective implementation of RA 9513, including increasing the flexibility of the Philippines’s power grid that does not translate to adding more “baseload” coal-fired power plants, but rather in diversifying its energy mix by promoting the development of more cost-effective renewable energy sources, that can quickly respond to shifts in demand at different time scales.**
4. That said, we recognize that a transition to a power sector dominated by RE would take years to accomplish, some aspects of which may only be attained through conditional commitments. Nonetheless, this should not be used as excuses for the Department of Energy to not aim for the highest possible ambition for the energy sector. This includes having a share for its unconditional commitments to be much higher than 2.8%, especially considering that the department mentioned in its own “Greening the Grid” report that a 100% RE share in the power system is possible as early as 2050. The findings of said report are inconsistent with the current projections from the Philippine Energy Plan that indicate a much-higher baseload demand, which is dominated by coal technologies, by 2040. Hence, **we call for the inclusion of clear decarbonization pathways in the NDC, indicative of a just transition in the energy sector, with a higher share of unconditional commitments, established timeline for reducing the reliance on fossil fuels, a rejection of nuclear power, and ambitious targets for RE development and energy efficiency by 2050.**
5. Based on engagements with the Department of Energy, it is known that the sector’s unconditional commitment is primarily focused on energy efficiency. Nonetheless, we seek clarifications with the energy projections used in the calculations of the sector’s targets in the NDC, especially on the following: (i) the inputs of extractive industries and other high-emissions sectors in the BAU scenario; and (ii) how the implementation of other energy-related policies, such as RA 11285 (Energy Efficiency and Conservation Act) are reflected in its targets.
6. Similarly, the transport sector in the Philippines needs to undergo modernization to reduce its environmental impacts, especially GHG emissions. We welcome policies and measures for installing cleaner modes of transport (i.e., trains, bus rapid transit, bikeways) and accompanying infrastructure, as they not only would reduce emissions from this sector, but also alleviate the issues experienced by road-users in the country. Nonetheless, the car-centric culture must end. **We demand for strategies reducing the use of private vehicles and promotion of a less-pollutive public transport system in the Philippines.** These must be reflective of a just transition in the sector of transport, especially on the modernization of the Philippines’s public utility vehicle fleet and promoting green freight. These must include clear timelines, targets, and mechanisms for technical and financial support to affected sectors and communities, without adversely affecting their capacities to attain development.

7.

Cross-cutting Issues

1. The Philippines must commit to **strengthening the integration of climate change into existing educational strategies, aligned with a “whole-of-nation” approach and in empowering current and future generations** in addressing the climate crisis adhering to the tenets of ecological justice and intergenerational responsibility. This would be accomplished through implementing policies and measures aligned with the goals of Article 6 of the UNFCCC and Article 12 of the Paris Agreement; these include the integration of climate change into existing school curricula, capacity-building programs for raising awareness and humanizing climate impacts and solutions, increasing public access to information and meaningful participation in implementing solutions, and strengthening international cooperation on related endeavors. These actions should communicate climate change-related principles through means that are readily understood by all sectors and enable communities towards sustainable development and ecological citizenship.

2. The voices of many vulnerable groups, including coal-affected communities, the urban poor, women, youth, indigenous peoples, farmers, and fisherfolk must be included if climate justice is truly intended to be at the forefront of the Philippines's calls and actions against the climate crisis. The exclusion of these sectors, which has been observed in many aspects of the NDC process, threatens their Constitutional right to "a balanced and healthful ecology in accord with the rhythm and harmony of nature", and their capacities to achieve sustainable living. As part of its mandate under RA 9729, **the Philippine government, led by the Climate Change Commission, must institutionalize more inclusive platforms for meaningful engagements by the most vulnerable sectors within the whole NDC process**, from planning to monitoring, reviewing, and validation.
3. In relation, **we call on the Philippine government to utilize indigenous knowledge and practices in addressing climate change impacts, with utmost respect to the rights of indigenous peoples.** This plays a significant role for the Philippines in increasing its capacity to mitigate and adapt to both sudden and slow onset events, and minimizing, if not averting, loss and damage, and reduces its dependence on accessing means of implementation to address issues that could otherwise be resolved through the use of indigenous knowledge and practices.
4. While we welcome the inclusion of policies and measures that would mitigate short-lived climate pollutants or SLCPs (i.e., methane through climate-smart agricultural activities, black carbon through modernizing of vehicular fleets, HFCs through promotion of low-GWP refrigerants), **the mitigation of SLCPs must nonetheless be reflected in decarbonization pathways for the Philippines in the NDC, with clear targets and timelines.**



Aksyon Klima Pilipinas is a broad civil society national network of more than 40 civil society organizations, networks and partners working on diverse climate and development-related issues. It aims to build campaigning capacity and leadership among its partner community organizations, NGOs and the academe, on climate policies and issues.



Green Convergence for Safe Food Healthy Environment and Sustainable Economy (Green Convergence Philippines) is a coalition that advocates for a development paradigm that addresses the need for social and economic upliftment, while preserving life-supporting water, air and land for generations to come.



The Green Thumb Coalition is a broad and united front of more than 40 organizations and networks that aims to elevate the issues of the environment, sustainable development and human rights in governance.



Youth Strike 4 Climate Philippines, one of the pioneer, youth-led climate movements in the country, is a nationwide youth-led organization and campaign in the Philippines; fueled by the goal to empower young Filipino people to act against the climate crisis. It is a network and alliances of Sangguniang Kabataan, youth and student organizations, advocacy groups, and individuals in different regions, cities, and municipalities in the country who demand bold climate actions from the Philippine Government by humanizing climate action through activism and storytelling.



Alyansa Tigil Mina (ATM) is an alliance of mining-affected communities and their support groups of NGOs/POs and other civil society organizations who are opposing the aggressive promotion of large-scale mining in the Philippines.



The Global Catholic Climate Movement (GCCM) is a global, grassroots movement of Catholics committed to living out the message of *Laudato Si'*: *On the Care of Our Common Home*.



The EcoWaste Coalition is a national network of more than 150 public interest groups pursuing sustainable and just solutions to waste, climate change and chemical issues towards the envisioned Zero Waste 2020 goal.



Earth Day Network Philippines is a network organization of different sectors of society campaigning for environmental citizenship. It also invites everyone to celebrate Earth Day every April 22.



GAIA Asia Pacific is part of the worldwide alliance of more than 800 grassroots groups, non-governmental organizations, and individuals in over 90 countries whose ultimate vision is a just, toxic-free world without incineration.



Caritas Philippines is the humanitarian, development and advocacy arm of the Catholic Bishops' Conference of the Philippines.



PMPI-Partnership Mission for People's Initiatives (formerly Philippines Misereor Partnership Inc.) is Philippine network of around 300 civil society organizations in the Philippines who are engaged in various initiatives, interventions and advocacies on social development issues.



The Catholic Bishops Conference of the Philippines - Episcopal Commission on Indigenous Peoples National Secretariat serves as central coordinator among church programs working with tribal Filipinos.



Parabukas is a young, boutique consulting firm working on laws and policies around climate change, the environment, and sustainable development.



CREST - Center for Renewable Energy and Sustainable Technology promotes the use of renewable energy systems and climate technologies by providing technical support and capacity-building to cities and communities.



Coastal CORE is a Sorsogon-based organization working on community-based natural resource management, disaster risk reduction and climate change adaptation.



Tebtebba is an indigenous peoples' global policy, research, education and resource center. Tebtebba brings representatives of indigenous peoples' organizations, networks and communities together to elaborate and deepen their views and positions and plan out education and awareness-raising campaigns they can do jointly.



Responsible Ilonggos for Sustainable Energy (RISE) is a group of concerned local NGOs, church-based institutions and individuals which aims to lobby for a serious study of the possible impacts of the proposed coal project and advocate for viable alternatives using new and renewable energy sources.



Climate Action for Sustainability Initiative (KASALI) is a group of individuals and community partners working on climate change science and solutions education, and regional sustainable development.



Center for Energy, Ecology and Development (CEED) is a think-do institution that conducts research and advocacy, and partners with communities in promoting an ecologically just, people-centered energy and development path.



Mother Earth Foundation (MEF) is a non-stock, non-profit NGO actively engaged in addressing waste and toxic pollution, climate change, and other issues.



Living Laudato Si' Philippines (LLS) is an interfaith movement initiated by Catholic laypeople calling on Philippine financial institutions to divest from coal-related operations and other environmentally harmful activities.



Rice Watch Action Network Inc (R1) is a network working individually and collectively to pursue policy changes in rice particularly in the area of trade and the nature of rice farming systems in the Philippines. R1 aims to strengthen existing initiatives of individual member organizations towards the same end.



Food for the Hungry Philippines is a Christian non-profit organization which has been in the country since 1979. Originally meant to serve refugees from the Vietnam war, the organization shifted its focus to the country's poor communities after the United Nations High Commission on Refugees was established; it serves almost 8,000 children in Metro Manila, Bulacan, Bicol, and Eastern Visayas.