

October 16, 2025

Bienvenido D. Lageusma
Secretary
Department of Labor and Employment
Intramuros, Manila,
Philippines

Dear Mr. Bienvenido D. Lageusma,

I am writing on behalf of Climate Rights International, an international NGO that conducts research and advocacy on the human rights dimensions of the climate crisis. For the past several months, we have been carrying out research for a report that we plan to publish on the human, environmental, and climate impacts associated with nickel mining in the Philippines' Caraga Region.

Based on roughly sixty interviews with community members, our research finds that nickel mining in Dinagat Islands and Surigao del Sur is threatening the rights of local people, harming the local environment, and exacerbating the impacts of the climate crisis. People told Climate Rights International that nickel mining and related pollution is destroying fishing and farming livelihoods, contributing to food insecurity, polluting water and air, and increasing health problems. Perversely, mining for nickel, needed for the renewable energy transition, is making local communities – who bear extremely little responsibility for the climate crisis – more vulnerable to climate impacts, including extreme weather events. The Philippines is the most dangerous country in Asia in which to be a land and environmental defender, and Climate Rights International has also documented how those who oppose mining can face threats, criminalization, and attacks.

We want to ensure that our report accurately reflects the views, policies, and practices of relevant authorities and companies, and we hope that you or your representatives will respond to the following questions, outlined below. Any responses will be reflected in our reporting as appropriate, and we may publish your responses at our discretion and when appropriate, either in full or in part.

Questions:

1. The Department of Labor and Employment (DOLE) is responsible for monitoring and enforcing labor conditions and occupational health and safety. Please explain what policies and regulations DOLE has governing occupational health and safety in nickel mines.
2. Does DOLE conduct unannounced inspections of mines or mining operations? If not, why not?
3. Does DOLE make public the results of inspections of mines or mining operations? If not, why not? If yes, how are those results made publicly available?
4. Several individuals told Climate Rights International that they became ill from exposure to environmental pollution, particularly dust, while working in nickel mining. Does

DOLE have any regulations governing dust exposure at work? If so, what are those regulations and how does DOLE enforce them?

5. Does DOLE monitor air, water and soil quality at mining operations?
 - a. Please provide information about DOLE's water quality testing, if any, including how frequently water samples are taken, where those samples are collected, and what pollutants it tests for.
 - b. Please provide information about DOLE's air quality monitoring, if any, including how frequently air samples are taken, where those samples are collected, and what pollutants it tests for.
 - c. Please provide information about DOLE's soil quality monitoring, if any, including how frequently air samples are taken, where those samples are collected, and what pollutants it tests for.
6. Does DOLE make the results of air, water or soil pollution monitoring available to the workers at the mining operation? If so, please explain how workers are able to access that information.
7. What steps does DOLE take if it determines that a work site, such as a mining operation, is hazardous to the health of the employees?
8. What steps does DOLE take to ensure that workers in nickel mines have proper access to personal protective equipment, including masks, to prevent exposure to pollution at the workplace?
9. Please provide annualized data on the number of workplace accidents, including fatalities, in nickel mining operations for each of the last ten years.
10. Does DOLE have adaptation plans, including plans to adapt to extreme weather events? If so, please elaborate.

Please provide your responses in writing. Your responses can only be considered for inclusion in our report if we receive them by October 24, 2025. Please reply in English. In addition, please include any other materials, statistics, and/or information you think may be relevant.

My colleagues will be in Manila November 3-6 to release the report and would welcome the opportunity to meet with you or your representatives. Please let me know if you will be available to meet with Climate Rights International during that time period.

Sincerely,

Brad Adams
Executive Director, Climate Rights International