

October 16, 2025

Jacqueline A. Caancan  
Concurrent Director  
Environmental Management Bureau; and  
OIC, Assistant Secretary for Environment  
Department of Environment and Natural Resources  
DENR Compound, Visayas Ave, Diliman,  
1101, Quezon City, Philippines

Dear Ms. Jacqueline A. Caancan,

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 Environmental Management Bureau (EMB) is responsible for inspecting and monitoring mines for compliance with environmental law and environmental compliance certificates. Please explain how the bureau fulfills these obligations.
2. Does EMB conduct unannounced inspections of mines? If not, why not?
3. Does EMG make public the results of inspections of mining operations? If not, why not? If yes, how are those results made publicly available?
4. Individuals from Dinagat Island and Surigao del Sur interviewed by Climate Rights International expressed concern about the impacts of nickel mining operations on fresh and saltwater resources, as well as increased siltation of rice and agricultural fields. What steps is EMB taking to ensure that nickel mining operations are not causing serious environmental pollution?
5. Does EMB monitor air, water and soil quality?

- a. Please provide information about EMB'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 EMB'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 EMB'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 EMB make the results of any pollution monitoring public? If so, please explain how community members are able to access that information.
7. Community members have alleged that some mine inspectors intentionally avoid finding pollution by, for example, avoiding taking water samples where the water is evidently polluted. What steps does EMB take to ensure that its inspectors are independent of the mining industry and accurately assess environmental pollution?
8. Please provide information about whether and how EMB monitors the management of tailings and other mining waste, including what steps EMB takes to ensure that tailings ponds are able to withstand extreme weather events.
9. What steps does EMB take when it receives an allegation of environmental pollution or negative impacts of its operations on local communities?
  - a. If EMB finds that a mining company has caused environmental pollution or negative impacts on local communities, what action does it take?
  - b. Has EMB ever suspended a mining license due to environmental pollution or negative impacts on local communities? If so, how often has it done so in the past ten years? How long did each such suspension last and what was the company required to do to be permitted to resume mining?
10. Does EMB 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