

October 16, 2025

Engr. Michael V. Cabalda
Assistant Secretary for Mining Concerns
Mining and Geosciences Bureau
MGB Compound, North Avenue, Diliman, Quezon City
Quezon City, National Capital Region
Philippines

Dear Engr. Michael V. Cabalda,

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 Mining and Geosciences Bureau (MGB) is responsible for the issuance of mining permits, including permits for nickel mining. Please explain the process pursuant to which MGB issues permits for nickel mining.
 - a. Does MGB hold public hearings as part of the licensing process? If so, when in the process are such hearings held and what is discussed in such hearings? If so, how are they publicized?
 - b. Does MGB hold public hearings when considering expansion or renewal of existing permits? If so, when in the process are those hearings held and how are they publicized?
 - c. What role do environmental impact assessments play in MGB's evaluation of nickel mining permits? How often in the last ten years has MGB denied a mining permit based on the likelihood of environmental or human rights harms?

2. What steps does MGB take to ensure that the right to Free, Prior and Informed Consent of Indigenous communities that will be impacted by new or expanded mines is respected?
3. MGB is also responsible for inspecting and monitoring mines for compliance with work programs, including the Environmental Protection and Enhancement Program and Final Mine Rehabilitation/Decommissioning Plans. Does MGB conduct unannounced inspections of mines? If no, why not?
4. Does MGB make public the results of inspections of mining operations? If no, why not? If yes, how are those results made publicly available?
5. What steps does MGB take to ensure that its inspectors are independent of the mining industry and accurately assess compliance with environmental protection and final mine rehabilitation plans?
6. 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 MGB taking to ensure that nickel mining operations are not causing serious environmental pollution?
7. Does MGB monitor air, water and soil quality?
 - a. Please provide information about MGB'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 MGB'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 MGB's soil quality monitoring, if any, including how frequently air samples are taken, where those samples are collected, and what pollutants it tests for.
8. Does MGB make the results of any pollution monitoring public? If so, please explain how community members are able to access that information.
9. Please provide information about whether and how MGB monitors the management of tailings and other mining waste, including what steps MGB takes to ensure that tailings ponds are able to withstand extreme weather events.
10. What steps does MGB take when it receives an allegation of environmental pollution or negative impacts of its operations on local communities?
 - a. If MGB finds that a mining company has caused environmental pollution or negative impacts on local communities, what action does it take?
 - b. Has MGB 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?
11. Does MGB 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

Cc: Engr. Larry M. Heradez
Regional Director, MGB Region XIII