

October 11, 2025

Miguel Alberto V. Gutierrez
President
San Roque Metals Inc.

Dear Mr. Miguel Alberto V. Gutierrez,

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 to be a land and environmental defender, and Climate Rights International also documents 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.

The following questions are related to the San Roque Metals Inc. (SRMI) mining operations under MPSA No. 031-94-X SMR.

Questions:

1. Individuals from Dinagat Island interviewed by Climate Rights International expressed concern about the impacts of SRMI's operations on fresh and saltwater resources, as well as increased siltation of rice and agricultural fields. What steps is SRMI taking to ensure that its operations are not causing serious environmental pollution?
2. Does SRMI monitor air, water and soil quality?
 - a. Please provide information about SRMI'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 SRMI'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 SRMI's soil quality monitoring, if any, including how frequently air samples are taken, where those samples are collected, and what pollutants it tests for.
3. Does SRMI make the results of any pollution monitoring public? If so, please explain how community members are able to access that information.
4. Please provide information about how SRMI manages its tailings and other mining waste, including what steps SRMI takes to ensure that tailings ponds are able to withstand extreme weather events.
5. Multiple people told Climate Rights International that they did not receive proper compensation from SRMI for the use of their lands.
 - a. Please describe the process of compensating local landowners for the use of their lands, including whether SRMI made any changes to the compensation previously paid by Wellex Mining Corp., the former operator of the MPSA.
 - b. What steps, if any, has SRMI taken to ensure it is fairly compensating all landowners for the use of their lands?
6. Regarding labor rights and occupational health and safety:
 - a. Please provide information on how many local residents were hired by SRMI, including both temporary and permanent employees.
 - b. Please provide data on workplace accidents, including types of accidents, how frequently they occurred, and what protocols SRMI followed after accidents.
 - c. What steps does SRMI to prevent workplace accidents?
7. Please provide information about SRMI's use of security guards, including whether SRMI retains its own private security, and if and when it has worked with members of the military or police regarding security matters.
8. What steps does SRMI take when it receives an allegation of environmental pollution or negative impacts of its operations on local communities? Does SRMI have a grievance mechanism through which community members can file a complaint? If so, please provide information regarding that mechanism, including how often it is used, how community members can access it, and how SRMI responds to complaints.
9. It is our understanding that the nickel mined by SRMI on Dinagat Island is exported to China and Indonesia. Is all nickel ore mined by SRMI, both at its Dinagat Island mine and any other mines in the Philippines, exported? Please provide a list of companies that purchase nickel ore from SRMI and companies involved in the export of nickel ore mined by SRMI, including from its Dinagat Island mine.

10. Did SRMI hold public meetings with local communities about its mining operations after it took over the MPSA in 2022? If so, please provide information about the dates, locations, and attendance of those meetings, including information about how community members were made aware of the meetings. In addition, please detail the information provided to communities at those meetings.
11. Does SRMI have climate adaptation plans, including plans to adapt to extreme weather events? If so, please elaborate.
12. Please provide a list of all subcontracting companies that work with SRMI at its Dinagat Islands nickel mining operations. What steps does SRMI take to ensure that individuals hired by subcontractors are properly compensated and have access to occupational health and safety protections?
13. Please clarify the relationship between Vista Buena Mining Corp. (project contractor) and SRMI (project operator) as it relates to the Dinagat Islands nickel mining concession under MPSA No. 261-2008-XIII. How does SRMI work with Vista Buena Mining Corp. on project governance?

Please provide your responses in writing. Your responses can only be considered for inclusion in our report if we receive them by October 22, 2025. Please reply in English. In addition, please include any other materials, statistics, and/or information you think may be relevant.

We would also welcome the opportunity to speak with you or your representatives. Please let me know if you have any questions or if you would like to arrange a meeting or video conference.

Sincerely,

Brad Adams
Executive Director,
Climate Rights International