



REPUBLIC OF THE PHILIPPINES
Department of Environment and Natural Resources
Environmental Management Bureau
Mines and Geosciences Bureau
MIMAROPA Region

JOINT MEMORANDUM

No. [REDACTED]
Series of 2021

FOR : **THE DIRECTOR**
Environmental Management Bureau
DENR Compound, Visayas Avenue, Diliman

FROM : **THE REGIONAL EXECUTIVE DIRECTOR**
DENR MIMAROPA

THE REGIONAL DIRECTOR
MGB MIMAROPA Region

THE REGIONAL DIRECTOR
EMB MIMAROPA Region

SUBJECT : **PROPOSAL TO EXCLUDE SMALL-SCALE SAND AND GRAVEL
EXTRACTION AND OTHER QUARRY PROJECTS FROM THE
REQUIREMENT OF GEOLOGIC STUDY IN REFERENCE WITH
EMB MC NO. 2020-27**

This has reference to the issued EMB Memorandum Circular (MC) No. 2020-27 re: “PROJECT THRESHOLD FOR EXTRACTION OF NON-METALLIC RESOURCES APPLYING FOR ENVIRONMENTAL COMPLIANCE CERTIFICATE (ECC). Relative to the said EMB MC, the EMB MIMAROPA Region has received¹ a letter addressed to the EMB Director dated 19 March 2021 from Hon. Jose R. Riano, Governor of the Provincial Government of Romblon. Said letter is a request for consideration that the geologic study as part of the Environmental Impact Assessment (EIA) Report for ECC application for small-scale sand and gravel (SAG) extraction, and other quarry projects in compliance with EMB MC No. 2020-27 be conducted by the Provincial Mining and Regulatory Board (PMRB) and the Mines and Geosciences Bureau (MGB) MIMAROPA embedded technical personnel assigned in the Province of Romblon instead of a registered mining engineer or geologist. However, said request cannot be granted by MGB MIMAROPA considering that this would constitute a conflict of interest as the approving authority for the technical report on geological assessment to be conducted is the MGB as per issued MC. Attached in the said letter is the response of MGB MIMAROPA Region on the request of the Provincial Government – Environment and Natural Resources – Romblon (PG-ENRO Romblon).

On the 2nd regular board meeting conducted on 27 November 2020, the Romblon Provincial Mining Regulatory Board (PMRB) passed a Resolution No. 06-20² requesting consideration for the exemption of small-scale SAG extraction, and other quarry projects from the provisions of EMB MC No. 2020-27. As stated in the resolution, Governor Riano already wrote a letter to EMB Central Office on 19 October 2020 requesting for the exemption of those small-scale SAG extraction and quarry projects that have an area of five (5) hectares below or for

Category B Project requiring IEE Checklist only. Governor Riano asserted in his letter that the cost of geological assessment study to be conducted by registered Mining Engineer and Geologist ranges from around two hundred thousand pesos (P200,000.00) which impedes that process of application wherein proponents are complaining on the high-priced rate for the geological assessment.

Above-stated concerns were raised and discussed on the first day of the DENR MIMAROPA Region Management Conference conducted last 6-7 April 2021. As agreed during the DENR MIMAROPA RMC, we hereby propose to exclude the small-scale SAG extraction and quarry projects from the requirement of a geologic study so as to review of what area/size shall be considered as small-scale for such projects.

For the Director's information and consideration.


ATTY. MICHAEL DRAKE P. MATIAS
Regional Director
EMB MIMAROPA Region

ROLAND A. DE JESUS, CESO V
MGB Assistant Director and
Regional Director
MGB MIMAROPA Region
in concurrent capacity

MARIA LOURDES G. FERRER, CESO IV
Regional Executive Director
DENR MIMAROPA Region

Attachments:

¹ Follow-Up Letter of Hon. Jose R. Riano for the Communication Letters with EMB Tracking number CO-2021-008301 and CO-2020-030829; and

² PMRB Resolution No. 06-20, A Resolution Requesting Consideration for Exemption of Small-Scale Sand and Gravel Extraction and Quarry Projects from the Requirements of EMB