



DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES  
KAGAWARAN NG KAPALIGIRAN AT LIKAS NA YAMAN  
MIMAROPA REGION



MEMORANDUM

**FOR :** **THE UNDERSECRETARY**  
Field Operations-Luzon, Visayas, and Supervising Undersecretary for  
Mines and Geosciences Bureau, Luzon and Visayas, Environmental  
Management Bureau-Luzon and Visayas

**ATTN :** **THE ASSISTANT SECRETARY**  
International Affairs, and Director, Biodiversity Management  
Bureau, in concurrent capacity

**THE DIRECTOR**  
Environmental Management Bureau

**FROM :** **THE REGIONAL EXECUTIVE DIRECTOR**

**SUBJECT :** **PROPOSED VICTORIA - SABLAYAN ROAD PROJECT  
OF THE DEPARTMENT OF PUBLIC WORKS AND  
HIGHWAYS**

This has reference to the proposed construction of the Victoria-Sablayan Road Project, which is under consideration by the Environmental Management Bureau for the issuance of Environmental Compliance Certificate (ECC).

The construction of the Victoria-Sablayan Road Project, which shall traverse the inner Occidental Mindoro area poses significant risks to the unique and threatened biodiversity of Mindoro Island. The review committee may recognize the critical significance of this area as the **last refuge for many threatened and endemic species**, including the Mindoro Warty pig, the Mindoro Bleeding Heart pigeon, the Philippine deer and the critically endangered Tamaraw, among others.

These species are already rendered vulnerable due to limited availability of habitable lands. The construction of the road project would only aggravate their living condition, as this would result in major habitat fragmentation, dividing the species' habitats into smaller and isolated patches, disrupting their natural movement patterns, and creating a permanent barrier. The isolation of the terrestrial faunal populations will result into a decreased genetic diversity, leading to inbreeding.

Aside from habitat fragmentation, the road project will also lead to an increase in human migration, following infrastructure development. This increases accessibility to the area, opening it up to poachers, and leaving it vulnerable to disturbances and other human activities which will affect critical criteria for the survival of the Tamaraw. For instance, the introduction of domesticated animals by the local migrants promotes disease occurrences as they serve as disease vectors. These animals are already living in habitats that are significantly smaller than their original range. Further reductions and increased human encroachment would result in higher occurrences of human-wildlife conflict.



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The road project, traverses the FB Harrison Game Refuge and Bird Sanctuary, which goes against the provision of **Item c., Section 29 of Republic Act 11975, General Appropriations Act**, which states that:

*“The planned construction of all infrastructure projects to be implemented within the National Integrated Protected Area System are done in a way that eliminates or minimizes the risk of biodiversity loss...Major infrastructure projects may only be undertaken in said areas if intended to enhance biodiversity.”*

The road project is not intended to enhance biodiversity, it poses risks that would lead to biodiversity loss.

In addition, Section 46 of the same RA mandated: *“All agencies of the government, including LGUs, SUCs, and GOCCs, shall endeavor to support the Kunning-Montreal Global Biodiversity Framework and ensure that protection of biological diversity is integrated and mainstreamed into their development programs and projects. Agencies shall likewise prioritize the conservation and restoration of natural ecosystems.”*

Hence, it is our recommendation to consider and re-design the road project in order not to disrupt the existence and survival of our critically endangered species.

For information and consideration, please.

  
**FELIX S. MIRASOL, JR. CESO IV**