

MEMORANDUM

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FOR

THE REGIONAL EXECUTIVE DIRECTOR

DENR - MIMAROPA Roxas Boulevard, Manila

FROM

The Provincial Environment and

Natural Resources Officer

SUBJECT

CONSOLIDATED REPORT ON A TWO-DAY LECTURE AND WORKSHOP PROGRAM RE: ENFORCEMENT ON ENVIRONMENTAL LAWS, RULES AND REGULATIONS CONDUCTED IN

ALL CENROS IN PALAWAN

Respectfully forwarding the Memorandum dated 10 June 2022 re: the Consolidated Report of PENRO Palawan Legal Unit re: the two-day seminar and workshop on the Enforcement of Environmental Laws, Rules and Regulations conducted in all CENROs in the Province of Palawan and Memorandum dated 30 May 2022 from CENRO Coron, Palawan re: Report on the conducted learning event cum workshop on the enforcement and environmental laws from 23-24 May 2022.

The said activity is geared towards the enhancement of legal knowledge of the Enforcement Unit of CENRO so as to apprise them of the legal procedures to be observed during the case build-up against environmental offenders. This will also strengthen their ability in preparing the necessary legal documents in filing environmental cases.

For your information and record.

FELIZARDO B. CAYATOC

PALAWAN BECORDS RELEASED

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June 10, 2022

DENR PENRO PALAWAN RECORDS

MEMORANDUM

FOR

: The Provincial Environment and Natural Resources Officer

PENRO, Palawan

THRU

: Atty. Jazmin D. Altea

Attorney III (Assigned Head)

FROM

The Legal Researchers

SUBJECT: CONSOLIDATED REPORT ON A 2-DAY LECTURE AND

WORKSHOP **PROGRAM** RE: **ENFORCEMENT** ENVIRONMENTAL LAWS, CONDUCTED IN ALL CENROS

IN PALAWAN

The PENRO Legal Unit noticed that some of the criminal cases filed by DENR-CENROs of Palawan were being dismissed at the Prosecutor level due to insufficiency of evidence or lack of probable cause. In order to address this issue, the PENRO Legal Unit with the assistance and full support of the Provincial Environment and Natural Resources Office (PENRO), and all the Community Environment and Natural Resources Offices (CENROs) in Palawan conceptualized and designed a 2-day Lecture and Workshop Program which focuses on the three-core topics, namely: 1) Evidence Gathering; 2) Legal Procedures; and 3) Legal Forms.

The Program is divided into two parts, the Interactive Lecture, wherein participants may raise questions and share their experiences simultaneously with the discussion on the different topics; and, the Workshop, which consists of evidence gathering and hands-on drafting of Application for Search Warrant, and other pertinent legal documents.

Relevant DENR Administrative Orders like DAO 97-32, DAO 2018-18, and DAO 2022-05, were also tackled during the program.

As of this date, the PENRO Legal had already reached its target audience. The PENRO Legal conducted the lecture on CENRO Puerto Princesa last May 4-5, 2022, on CENRO Brooke's Point and CENRO Quezon last May 12-13, 2022, on CENRO Roxas and CENRO Taytay last May 16-17, 2022, and CENRO Coron last May 23-24, 2022.

During the lecture part of the program, the PENRO Legal noted some notable questions from the participants, which are as follows:

CENRO-PUERTO PRINCESA (MAY 4-5, 2022):

- 1. How are they going to prove the value of seized illegal lumbers in Court if the said lumbers belong to a banned species and the only basis for its valuation is the Black-Market Price?
- 2. Whether they can seize the illegal lumbers inside of a fenced compound situated in a timberland if it is in plain view.
- 3. Whether they can open the compartment of a vehicle passing in their checkpoint on the ground of a reliable tip/report.

As to the first query, the team informed them that in the absence of any DAOs or Price Index Monitoring for banned species of lumbers, their best evidence to support their valuation will still be the Recapitulation, even if it is based on the black-market price. Although the reliance in such valuation is weak and may be deemed as hearsay as the lumbers belong to a banned species and that no established guidelines to support the same, the recapitulation will still be admissible, unless questioned by the opposing party.

With respect to the second query, we qualify. If there is a probable cause and that they have a sufficient time to obtain a search warrant, they shall document the incident, take videos and pictures and draft affidavits to support their application for search warrant. This is to avoid any technicalities and possible counter-case for Violation of Domicile against them. However, if time is of the essence, they can effect the seizure of illegal lumbers so long as they established the requirements set forth under the plain view doctrine. Nevertheless, we strongly advise them to always apply for search warrant if the circumstances allow them to do so.

In the third query, we advise them that a tip or report is deemed to be a hearsay as held by the Supreme Court in several cases. It is not sufficient to constitute probable cause in the absence of any other circumstance that will arouse suspicion. Thus, they cannot open the compartment by relying alone on a mere tip or report that they have received. However, they can still conduct a visual search but not an extensive search on a vehicle passing-by in their checkpoints.

CENRO-BROOKE'S POINT (MAY 12-13, 2022):

- 1. Can they demolish shanty/shacks/nipa huts built by kaingeros and is situated in a timberland area?
- 2. What are their remedies if they cannot haul the illegal lumbers due to the remoteness of the apprehension area from their Office nor bring it in the custody of the nearest Barangay unit?
- 3. What if they did not catch the offender in the act of committing an environmental offense? What may be their recourse to strengthen their case?

On their first question, the team reiterated the Legal Opinion of Atty. Gandhi Gagni-Flores, stating therein that the DENR cannot issue a demolition order to summarily abate and remove illegal structures absent a court order. The only instance that the DENR may summarily order said demolition is when the structures are built within a protected area and in cases of emergency.

As to the second question, we informed them that if the hauling of illegal lumbers is not feasible and practicable, they may convert the object evidence (illegal lumbers) into documentary evidence. This is done through proper marking, inventory, and photodocumentation. Further, the failure to haul the illegal lumbers must be based only on justifiable reasons. On the other hand, we emphasized to them the importance of hauling the illegal lumbers, since it is the corpus delicti. It is the best evidence to prove the existence of environmental offenses committed by the offender.

As to the third question, we told them that they should conduct further investigation until they have sufficient evidence to establish the identity and guilt of the offender. Although they may lack direct evidence against the offender, they may still resort to circumstantial evidence which tends to establish, by inference, a fact in issue.

CENRO-QUEZON (MAY 12-13, 2022):

- 1. Does the DENR-CENRO have authority to inspect areas considered as Protected Area but is under a valid Mineral Production Sharing Agreement (MPSA)?
- 2. Can DENR-CENRO apprehend individuals who are caught with possession of wild boar but such possession was by virtue of the livelihood project between the LGU and the Department of Agriculture?

As to the first query, the team informed them that it is the DENR Mines and Geosciences Bureau (MGB) which is vested with the authority to inspect and monitor areas under a valid MPSA. It is the Bureau who has the authority to oversee large-scale mining activities and operation despite it being under a protected area. However, we informed them that the DENR-CENRO can coordinate with the DENR-MGB to inspect the areas covered by a valid MPSA but still within the protected area.

As to the second query, the team informed them that they can apprehend individuals who are caught in possession of wild boar. Under the Wildlife Act, the mere possession of a wildlife is already a violation of the law. The source is immaterial because the law punishes mere possession of wildlife.

CENRO-ROXAS (MAY 16-17):

- 1. Whether a titled land, although inside the protected area but is classified as alienable and disposable and was covered by a torrents title issued to a private individual prior to the declaration as protected area, may be covered by a sale transaction.
- 2. Whether a person who has been occupying (prior to NIPAS Law) a portion of land inside the protected area may request for the processing of the title of the said land under his/her name after the effectivity of NIPAS Law.

3. What could be a more accurate and acceptable basis for the computation or assessment of value of seized illegal lumbers considering that there is no existing market value for banned species?

As to the first query, we answered in affirmative. Under Section 22 of ENIPAS Act, all private rights within the protected area already existing and/or vested upon effectivity of ENIPAS Act shall be protected and respected. Provided, that the exercise of such rights shall be harmonized, as far as practicable, with the provision of ENIPAS Act. Here, the Torrens title was issued to private individual prior to the declaration as protected area. Hence, the titleholder already has a vested right and may exercise private rights over it.

The second query dwells on the interpretation of the implementing administrative agency of the ENIPAS Act. Our initial reply is that the titling of land within the declared protected areas after the NIPAS/ENIPAS Law is not allowed as it is prohibited under the said law. However, we informed the participants that we will conduct further research and inquiries as to any related legal opinion issued by the DENR covering the matter.

In the third query, there is no actual standard value readily available in the market because these are banned species. Possible option would be for the agency to release a Price Index Monitoring. However, we reiterated that absence of such, their best evidence to support their valuation will still be the Recapitulation, even if it is based on the blackmarket price. Although the reliance in such valuation is weak and may be deemed as hearsay as the lumbers belong to a banned species and that no established guidelines to support the same, the recapitulation will still be admissible, unless questioned by the opposing party.

CENRO-TAYTAY (MAY 16-17):

- 1. Whether an individual/corporation may apply for a quarrying permit even if the source within the protected area?
- 2. Whether the CENRO personnel may enforce mining laws in protected areas?

On their first question, we discussed the prohibited acts under Section 20 of R.A. No. 7586 or the E-NIPAS Act. We then explained that mining activities can be identified as mineral location as prohibited without any exception by Section 20 of the said law. We noted that in a stricter sense, any form of mining activities is prohibited within protected areas and the government/LGUs cannot issue permit to the same.

As to the second question, we reiterated DAO 2018-18 which authorized PENROs and CENROs to arrest offenders and confiscate/seize illegally – sourced mineral/mineral products and the tools, equipment and conveyance used in the commission of illegal mining. Thus, CENRO personnel are automatically deputized by virtue of the said DAO to enforce environmental laws including mining laws to their area of assignment.

CENRO-CORON (MAY 23-24):

1. What is the applicable easement zone for unclassified public lands?

We clarified that under Sec. 3 (a) of PD 705, it essentially states that lands of the public domain which have not been subject of the present system of classification are considered as forest land. Public lands which have not been classified as alienable and disposable land remains part of the inalienable public domain.

On the Workshop part of the program, the PENRO Legal prepared fill-in-the-blanks Application for Search Warrant, Motion for Two Alternative Recording Device, Conduct of Orderly Search, and drafted Sworn Statements and Return of Search Warrant.

We grouped the participants and gave them a scenario wherein they are going to draft the above-mentioned legal documents in order to secure a search warrant from the court. During the activity, we observed the teamwork of the participants and their detailed and critical examination of the case.

When we evaluate their activity, majority of the participants got an exemplary mark as they already knew what statements, facts, and circumstances to be included in their legal documents. The confusion begins as to the legal procedures on the application for search warrant. Thus, to fully understand the said legal procedures, the PENRO Legal extensively discussed this process. All in all, the PENRO Legal is impressed with the dedication of the participants to learn the legal process of search warrant.

The PENRO Legal also prepared simulation/roleplaying activities on the marking of evidence and photodocumentation. However, these activities have not been conducted in CENRO-Puerto, CENRO Brooke's Point, CENRO Taytay due to time constraints. Instead, the topics were discussed to the participants. Only the team assigned to CENRO-Quezon, CENRO Roxas, and CENRO Coron were able to conduct said activities.

On a final note, the participants requested the PENRO Legal to make legal forms, particularly, Sworn Statements, Complaint-Affidavit, and the like, that will serve as their guide and sample in drafting legal documents.

For your information.

PASCUA

LR for CENRO Taytay

ENUS CELESTE AGUILA

LR for CENRO Quezon

ATTY, HA

LR for CENRO Brooke's

Point

NIÑA BERD

LR for PEMRO

JOY DEINI LR for **FNR** Puerto

Princesa

LR for CENRO Roxas

NERRIE MARCKETT PRECIOUS REDONDO LR for CENRO Coron

PROGRAM FLOW

DAY 1

Note: The discussion will be simultaneous with question and answer in order to promote interactive learning.

- I. Discussions on the following Environmental Violations and related Rules and Regulations:
 - 1. Violations concerning Trees and Other Forest Products
 - a. Revised Forestry Code, as amended
 - i. Cutting, gathering and collecting timber or forest products without license (Sec. 77 of PD 705, as amended);
 - ii. Unauthorized possession of timber or forest products (Sec. 77 of PD 705, as amended).
 - b. Wildlife Act
 - i. Logging in critical habitats (Sec. 27 (c)(v) of RA 9417);
 - ii. Collecting, hunting or possessing wildlife, their by-products and derivatives (Sec. 27 (f) of RA 9417);
 - iii. Gathering or destroying of active nests, nest trees, host plants and the like (Sec. 27 (g) of RA 9417);
 - iv. Transporting of wildlife (Sec. 27 (i) of RA 9417).
 - c. Expanded National Integrated Protected Areas System (E-NIPAS) Act
 - Cutting, gathering and collecting timber or forest products within the protected area including private lands therein (Sec. 18 (c) of RA 11038);
 - ii. Possessing or transporting outside the protected area any timber, forest products, wildlife, or by-products derived therefrom (Sec. 18 (d) of RA 11038);
 - iii. Engaging in 'kaingin' or, any manner, causing forest fires inside the protected area (Sec. 18 (i) of RA 11038).
 - 2. Violations concerning Unlawful and Illegal Occupation on Government Lands
 - a. Revised Forestry Code, as amended
 - i. Unlawful Occupation or Destruction of Forest Lands and Grazing Lands (Sec. 78 of PD 705, as amended)
 - b. Philippine Fisheries Code
 - i. Conversion of Mangroves (Sec. 94, RA 8550)
 - c. Wildlife Act
 - i. Squatting or otherwise occupying any portion of the critical habitat (Sec. 27 (c)(ii) of RA 9417)
 - d. Water Code
 - i. Building structures in easement areas (Sec. 51 of PD 1067)
 - e. Expanded National Integrated Protected Areas System Act
 - i. Occupying or dwelling in any public land within the protected area without clearance from the PAMB (Sec. 18 (n) of RA 11038);
 - ii. Constructing, erecting, or maintaining any kind of structure, fence or enclosure, conducting any business enterprise within the protected area without prior clearance from the PAMB and permit from the DENR, or conducting these activities in a

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manner that is inconsistent with the management plan duly approved by the PAMB (Sec. 18 (o) of RA 11038); iii. Purchasing or selling, mortgaging or leasing lands or other portions of the protected area which are covered by any tenurial instrument (Sec. 18 (u) of RA 11038); iv. Constructing any permanent structure within the forty (40)-meter easement from the high water mark of any natural body of water or issuing a permit for such construction pursuant to Article 51 of Presidential Decree No. 1067: Provided, That construction for common usage wharves and shoreline protection shall be permitted by the PAMB only after thorough EIA (Sec. 18 (v) of RA 11038).				
3. Mining and Quarrying a. Philippine Mining Act i. Theft of minerals (Sec. 103 of RA 7942); ii. Transporting minerals without proper delivery receipt				
4. Miscellaneous Laws, Rules and Regulations a. Solid Waste Management Act b. Plea Bargaining under New c. Strategic Lawsuit Against Public Participation				
1. Legal Procedures to be Observed during Apprehension 1. With Search Warrant i. Application for Search Warrants; ii. Motion for Two (2) Alternative Devices; iii. Service of Search Warrant iv. Conduct of Orderly Search; v. Return of Search Warrant.				
Without Search Warrant i. Procedure in Conducting Warrantless Search Evidence Gathering				
 III. Workshop 1. Drafting of Sinumpaang Salaysay, Complaint, and other legal documents; 2. Preparation of Annexes/Pieces of Evidence. 				
IV. Evaluation and Assessment 1. Evaluation of the Complaint with Annexes and Assessment of Witnesses				
DAY 2				
V. Continuation of Workshop VI. Open Forum VII. Inventory of Cases				

TARGET DATE	TEAM COMPOSITION
May 4 – 5, 2022	CENRO Puerto Princesa Team Leader: Joy Alcantara Members: Twinkle Redondo Niña Berdonar Ryan Cayatoc Venus Aguila
The second secon	South Palawan
May 12 – 13, 2022	CENRO Brooke's Point Team Leader: Harlene Hemor
	Team Leader: Venus Aguila Members: Twinkle Redondo Haziell Pascua
Participation of the Property	North Palawan
May 16 – 17, 2022	CENRO Roxas Team Leader: Ryan Oliver Cayatoc Members: Venus Aguila Harlene Hemor Joy Alcantara CENRO Taytay Team Leader: Haziell Pascua Members: Niña Berdonar Twinkle Redondo
May 18 – 20, 2022	CENRO Coron Team Leader: Twinkle Redondo Members: Niña Berdonar Haziell Pascua

CENRO-PUERTO PRINCESA (MAY 4-5, 2022) CONDUCTED AT PENRO FUNCTION HALL



CENRO-BROOKE'S POINT (MAY12-13, 2022) CONDUCTED AT CENRO BROOKE'S POINT FUNCTION HALL







CENRO-QUEZON (MAY 12-13, 2022) CONDUCTED AT PENRO FUNCTION HALL



CENRO - ROXAS (MAY 16-17, 2022) CONDUCTED AT CENRO-ROXAS OFFICE







CENRO-TAYTAY (MAY 16-17) CONDUCTED AT TAY LELONG'S, TAYTAY, PALAWAN











CENRO-CORON (MAY 23-24, 2022) CONDUCTED AT CENRO – CORON OFFICE











CENRO-BROOKE'S POINT (MAY12-13, 2022) CONDUCTED AT CENRO BROOKE'S POINT FUNCTION HALL





CENRO-QUEZON (MAY 12-13, 2022) CONDUCTED AT PENRO FUNCTION HALL



CENRO - ROXAS (MAY 16-17, 2022) CONDUCTED AT CENRO-ROXAS OFFICE







CENRO-TAYTAY (MAY 16-17) CONDUCTED AT TAY LELONG'S, TAYTAY, PALAWAN











CENRO-CORON (MAY 23-24, 2022) CONDUCTED AT CENRO – CORON OFFICE













Republic of the Philippines

Department of Environment and Natural Resources

Community Environment and Natural Resources Office Barangay 5, Calamianes Island, Coron, Palawan Telephone No. +63 917 504 2633

E-mail:cenrocoron@denr.gov.ph Website: www.denr.gov.ph

MEMORANDUM

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FOR

The Provincial Environment and

Natural Resources Officer

Bgy. Sta. Monica, Puerto Princesa City

FROM

The Community Environment and

Natural Resources Officer

SUBJECT

REPORT ON THE CONDUCTED LEARNING EVENT CUM

WORKSHOP ON ENFORCEMENT AND ENVIRONMENTAL

LAWS FROM MAY 23-24, 2022 IN CENRO CORON,

PALAWAN

DATE

May 30, 2022

Respectfully forwarded is the attached report of Forest Ranger Lyneth A. Ilovino May 27, 2022 regarding the conducted learning event cum worksop on enforcement and environmental laws from May 23-24, 2022 at Sikangay Hall, DENR-CE GNHNRO, Coron, Palawan.

This workshop facilitated by the Legal Researchers and Forester III Norma D. Cayatoc from PENRO, Palawan. Topics discussed are about the environmental laws, rules and regulations particularly the provisions of PD 705 as amended and DAO 97-32. It aims to enhance the knowledge of front-liners especially on Enforcement and Monitoring Section

For your information and record.

ARNOLDO A. BEAZA. JR.





Republic of the Philippines

Department of Environment and Natural Resources

Community Environment and Natural Resources Office Barangay 5, Calamianes Island, Coron, Palawan Telephone No. +63 917 504 2633

E-mail:cenrocoron@denr.gov.ph Website: www.denr.gov.ph

MEMORANDUM

TO

The Community Environment and

Natural Resources Officer

FROM

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Forest Officer

SUBJECT

REPORT ON THE CONDUCTED LEARNING EVENT CUM WORKSHOP ON ENFORCEMENT AND ENVIRONMENTAL LAWS FROM MAY 23-24, 2022 IN CENRO CORON, PALAWAN

DATE

:

May 30, 2022

This pertains to the conducted learning event cum workshop on enforcement of environmental laws from May 23-24, 2022 at Sikangay Hall, DENR-CENRO Coron, Palawan.

Please be informed that the two (2) day workshop was attended by the personnel of this Office especially on Monitoring Enforcement Section. The activity facilitated by the Legal Researcher from PENRO, Palawan, Atty. Haziell Pascua, Ms. Nerrie Margarett Precious Redondo, Ms. Niña G. Berdonar and Forester III Norma D. Cayatoc.

The topics discussed during the workshop are; Revised Forestry Code, PD 705 Section 77 as amended; DAO 97-32; eNIPAS Act, RA 11038 Section 18; Wildlife Act, RA 9147 Section 27; Philippine Mining Act of 1995, RA 7942; Warrantless search; Drafting and serving of search warrant; Rules on the Use of Body-Worn Cameras in the execution of warrants; Solid Waste Management Act of 2000; Strategic Law Suit Against Public Participation (SLAPP) and Plea Bargaining in Environmental Cases;

Be informed further, that the attendees also conducted an actual demonstration (enactment) on proper apprehension and preparation of reports. The exercise will greatly help the apprehending officers improve their knowledge on environmental laws. Some questions were raised during the open forum and were answered by the resource person and PENRO Felizardo B. Cayatoc.

The workshop enhanced the knowledge particularly the front-liners on Enforcement and Monitoring Section on the different environmental laws, rules and regulations.

Attached herewith are the geo-tagged photos, program and attendance sheet.

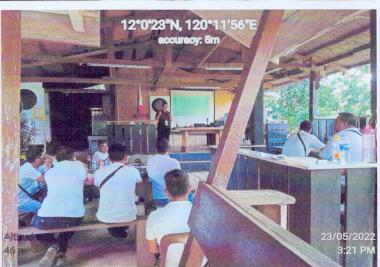
For your information and record.

LYNETH A. I Forest Ranger Geo-tagged photos taken during the learning event cum workshop on enforcement of environmental laws at Sikangay Hall, DENR-CENRO Coron, Palawan on May 23-24, 2022

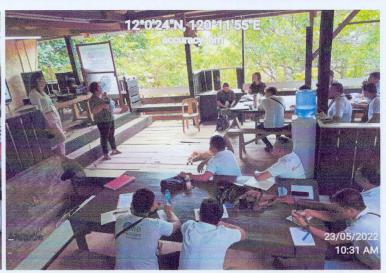




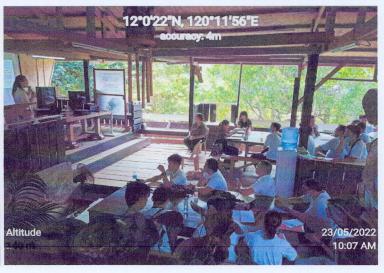
































LEARNING EVENT CUM WORKSHOP ON ENFORCEMENT OF ENVIRONMENTAL LAWS

Sikangay Hall, DENR-CENRO Coron, Palawan MAY 23-24, 2022

DAY ONE (May 23,	2022)				
9:00-9:30AM	Opening Remarks				
9:30-10:00AM	Introduction of Speakers				
10AM-10:30AM	Snacks				
10:30AM-12:00PM	Topics:				
	Revised Forestry Code, PD 705 as amended				
	DAO 97-32				
	eNIPAS Act, RA 11038 Section 18				
12:00PM-1:00PM	Lunch				
1:00PM-3:00PM	Topics:				
	Wildlife Act, RA 9147 Section 27				
	Philippine Mining Act of 1995, RA 7942				
3:00PM-3:30PM	Snacks				
3:30PM-5:00PM	Topic:				
	Solid Waste Management Act of 2000				
DAY TWO (May 24,	2022)				
9:00AM-10:00AM	Topics:				
	Drafting and serving of Search Warrant				
Warrantless Search					
	Rules on the Use of Body-Worn Cameras in the execution of warrants				
10AM-10:30AM	Snacks				
10:30AM-12:00PM	Topics:				
	Strategic Law Suit Against Public Participation (SLAPP) and Plea				
	Bargaining in Environmental Cases;				
	Actual Demonstration of proper apprehension and serving of search				
	warrant				
12:00PM-1:00PM	Lunch				
1:00PM-2:00PM	Review of topics				
2:00PM-3:00PM	Open forum				
3:00PM-3:30PM	Snacks				
3:30PM-4:30PM	Awarding of Certificates				
4:30PM-5:00PM	Closing Remarks				



LEARNING EVENT CUM WORKSHOP ON ENFORCEMENT OF ENVIRONMENTAL LAWS MAY 23, 2022

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LEARNING EVENT CUM WORKSHOP ON ENFORCEMENT OF ENVIRONMENTAL LAWS MAY 23, 2022

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Email address: cenrocoron@denr.gov.ph



LEARNING EVENT CUM WORKSHOP ON ENFORCEMENT OF ENVIRONMENTAL LAWS

MAY 23, 2022 PM

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LEARNING EVENT CUM WORKSHOP ON ENFORCEMENT OF ENVIRONMENTAL LAWS $$\operatorname{MAY}\ 23,\,2022$$ PM

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32	POJ D. PARCUX	MGP CAC	-		12/
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45	JEFFREY CACTUO	F11/P.O.	/		Zd.
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Calamianes Island, Coron, Palawan Email address: cenrocoron@denr.gov.ph



LEARNING EVENT CUM WORKSHOP ON ENFORCEMENT OF ENVIRONMENTAL LAWS MAY 24, 2022

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Department of Environment and Natural Resources MIMAROPA Region

COMMUNITY ENVIRONMENT AND NATURAL RESOURCES OFFICE

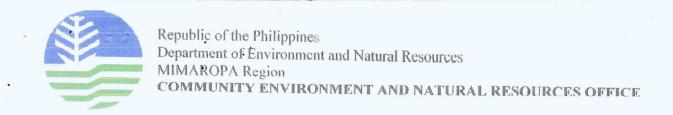
Barangay 5, Calamianes Island, Coron, Palawan Telephone No. +63 917 504 2633

E-mail:cenrocoron@denr.gov.ph Website: www.denr.gov.ph

LEARNING EVENT CUM WORKSHOP ON ENFORCEMENT OF ENVIRONMENTAL LAWS

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LEARNING EVENT CUM WORKSHOP ON ENFORCEMENT OF ENVIRONMENTAL LAWS MAY 24, 2022 PM

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