



MEMORANDUM

FOR : The Regional Executive Director
DENR Region 4-B (MIMAROPA)
1515 L & S Bldg., Roxas Blvd., Metro Manila

FROM : The Director
In concurrent capacity as Assistant Secretary for Policy, Planning and Foreign-Assisted and Special Projects

SUBJECT : **COMMENTS AND RECOMMENDATIONS ON THE DRAFT PROTECTED AREA MANAGEMENT PLAN (PAMP) FOR CY 2022-2031 OF TUBBATAHA REEFS NATURAL PARK (TRNP)**

MAR 15 2023
DENR MIMAROPA
RECORDS SECTION
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BY: Rae DATE NO. _____
TIME: _____

Pursuant to the existing guidelines including the Implementing Rules and Regulations of the ENIPAS Act, which provides that the PAMB shall review, update, and if necessary, modify the PAMP, at least every three (3) years, in accordance with studies, sound resources assessments, and surveys, and the social dynamics in the protected area, we are providing the following comments and recommendations on the submitted PAMP of Tubbataha Reefs Natural Park (TRNP):

1. The TRNP management plan did not provide the management zones as it is conserved as a "no-take zone" though tourism and research is being allowed in seasonal basis and in limited location. The TRNP though has specific legislation, should adhere with the provisions of the NIPAS Act as amended. Hence, identification and identification of management zones is a requirement. Please note that the identification and designation of SPZ and MUZ is a major component of the PAMP since all activities that shall be allowed, regulated/controlled, and restricted are dependent on the appropriate location of MUZ and SPZ of the protected area. Hence, zoning should be carefully prepared based on the data requirements indicated in BMB Technical Bulletin No. 2018-01 and BMB Memorandum dated 06 February 2020 on the Prescribed Primary and Secondary Thematic Datasets for the Preparation or Updating of Management Zones of Protected Areas and in consultation with the concerned stakeholders particularly the PAMB members.
2. The Executive Summary should immediately provide the location and the extent of area coverage of TRNP and its buffer zone. The Executive Summary should also provide information on the previous management plan and the present status of its implementation, highlighting the similar or different approaches and strategies to be undertaken for the updated management plan.
3. The draft Plan should provide annexes of the key documents such as biodiversity assessment, socio-economic assessment, highlights of consultations, maps among others.
4. The draft plan does not provide any gender and development discussion.



5. Provide discussion on the integration of climate change adaptation and disaster risk reduction measures in the management strategies since climate change is one of the significant threats identified in TRNP
6. Kindly enhance the Monitoring and Evaluation Section in the Management Plan. This Section is also an important component of the plan in order to document and measure overall performance and achievement of the desired results set out in the Management Plan.

Detailed comments and recommendations are provided in the attached Matrix for your reference and guidance.

Lastly, along with the updated PAMP, please submit also the accomplished checklist for the review of PAMPs as provided through BMB Technical Bulletin No. 2017-08. The said checklist serves as a guide for the DENR Regional Offices to facilitate the review of the PAMP prior to its submission to the Office of the Secretary through the BMB.

Your immediate revision of the Management Plan is hereby enjoined to facilitate the affirmation by the Undersecretary for Policy Planning and International Affairs following Rule 9.7 of the DENR Administrative Order No. 2019-05 (Implementing Rules and Regulations of RA 7586, as amended by RA 11038).

For information and further appropriate action.


MARCIAL C. AMARO, JR.



Republic of the Philippines
Department of Environment and Natural Resources
BIODIVERSITY MANAGEMENT BUREAU



BMB202301219

Protected Area Management Plan Assessment Checklist

(This tool is meant to facilitate the preparation and review of Protected Area Management Plans.

It is not meant to restrict the process of preparation of management plans.)

Name of PA	TUBBATAHA REEFS NATURAL PARK		
Name of Assessor	Babylyn M. Cacao	Date	February 22, 2023
	Juliana A. Balogo	Assessed	February 27, 2023
		Recommendation:	The draft management plan should be revised and to include comments and recommendations of this Bureau.

Section	Guide Questions	Yes/No	Remarks
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Overall

	1	Does the plan contain all the required parts/sections as outlined in the technical bulletin?	Yes	The draft Plan contains required parts/sections based on the prescribed outline. However the title should be replaced with "Tubbataha Reefs Natural Park Management Plan" instead of "Tubbataha Reefs Natural Park General Management Plan"
	2	Are the area's important biodiversity components/elements, its value(s) to people, and key threats/pressures/issues/concerns identified and described in the Executive Summary?	No	The Executive Summary should immediately provide the location and the extent of area coverage of TRNP and its buffer zone. The important biodiversity components of the TRNP as well as the threats and pressures including issues and concerns should be briefly discussed in the Executive Summary. The vision and mission of the protected area should also be included in the Plan. The Executive Summary should also provide information on the previous Management Plan and the status of its implementation highlighting the main differences from the previous to the current Plan.
	3	Is there a discussion describing the process adopted in the formulation/updating of the management plan?	Yes	The draft Plan provides the processes undertaken in the updating of management plan.
	4	Does the plan include an annex of key documents such as biodiversity assessment, socio-economic assessment, minutes of meetings, highlights of consultation workshops, etc.?	No	Please provide annexes for reference purposes which include results of biodiversity assessments, minutes of meeting and highlights of the consultation conducted in the updating of the management plan. List of species present in the protected area should also be included in the Plan as one of the annexes.
	5	Does the plan use standard terminologies in protected area management?	Partly Yes	The term "General Management Plan" which was repeatedly used in the Plan should be replace with "Protected Area Management Plan". Need to provide definition of terms and list of acronyms

Description of the Protected Area

Biophysical	6	Were both secondary and primary data adequately collected and used in the updating/formulation of the management plan? Were they adequately referenced (author, year, title, source, etc.) and made accessible/available?	Partly Yes	There were mentioned of secondary data information used as the reference in page 6, however the information is based only on studies commission by CI Philippines in 2006-2007. Updated studies and researches should also be included. The resuts of the studies should be form part of this plan as one of the annexes.
	7	Are the various ecosystem and sub-ecosystem types identified (even if only through remote sensing) and depicted on a map?	Partly Yes	The map of biodiversity in TRNP was provided in page 13 of the draft plan. However, the map should be updated based on the current situation of the area and be clearly presented since legends are not readable. A brief description right after the map should also be provided.
	8	Are the key threats/pressures identified, their abundance and distribution mapped?	Partly Yes	The threats, issues and concerns were clearly discussed in page 10-12 of the draft plan but not reflected in the map
	9	Are the key species identified, their abundance and distribution mapped?	Yes	Key species were identified in page 6 of the draft plan and reflected in the map in page 15

Section		Guide Questions	Yes/No	Remarks
	10	If available, was the diversity index of the various sampling stations (properly computed and) adequately presented for use in management zoning and monitoring?	No	There was no discussion on the diversity index, nor discussion on the established various sampling stations. The map presented in Figure 3, should further be discussed as the legend provided in the map is limited
Socio-economic	11	Are the key ecosystem services values identified, their (relative) abundance and distribution mapped?	Partly Yes	The key ecosystem services values are identified and enumerated in page 8 of the draft Plan, (e.g. scuba diving sites, lakes, beaches for tourism attraction value and water) but not reflected in the map. Map of these ecosystem services and values should be provided as Annex of the Plan
	12	Does the plan contain a description of the conservation value of the protected area?	Yes	The conservation values of TRNP as home of marine life and as a breeding and rookery grounds for migratory and resident seabirds were discussed in page 7
	13	Have the PA's current values been quantified either in peso terms or in relative terms?	No	The current and potential values of TRNP is not quantified either in peso. The discussion on tourism revenue from the Tubbataha which contribute to the livelihood of the communities in Cagayancillo is not sufficient to determine the current values of TRNP.
	14	Have the PA's potential values been quantified either in peso terms or in relative terms?		
	15	Does the plan contain a description of the socio- economic conditions of men and women within and adjacent to the protected area and properly reflected in the map showing settlements and extent of economic and social activities?	No	Tubbataha Reefs NP is uninhabited under the political jurisdiction of Cagayancillo, Palawan. Though TRNP is uninhabited, the economic activities in Cagayancillo relative to the TRNP values should also be described and discussed in the Plan
Institutional	16	Are there discussions on the institutions that are active in the protected area, including their plans, programs and activities?	Yes	The institutions and stakeholders who are active were enumerated and discussed in page 17 and 18
	17	Have disaster risks and climate change adaptation been discussed?	No	Provide discussion on the potential disaster risk and impacts of climate change adaptation that may occur since climate change is one of the most significance threats identified that may occur in TRNP.
	18	Have gender and development and indigenous peoples been discussed?	No	The draft plan does not provide any gender and development discussion
	19	Are the human resources (quantity and capacity) currently available?	Partly Yes	The human resources of TRNP including its organizaional structure are discussed in page 26-30 of the draft plan. It should also discussed the quantity and capacity of the current personnel of the Park
Situational Analysis				
	20	Have the various threats/pressures/issues/concerns to be addressed and the opportunities for optimizing potential values been identified by sector?	Partly Yes	The threats, issues and concerns were clearly discussed in page 10 of the draft plan. However, there should also have discussion on the threats that were addressed and what are remain unresolved. On page 11 of Threats, Issues and Concerns, specifically item 3. Inadequate infrastructure, please update the information since the funds from the DENR for the construction of the Tubbataha Ranger Station was already released and transfered to the TRNP fund
	21	Are the sectoral criteria/process by which various threats/pressures/issues/concerns to be addressed were prioritized clear?		
	22	Are there discussion on the implications and effects of the identified threats/issues/concerns?		
	23	Are there discussions on the policy implications or management interventions to address the identified issues and concerns?	No	There should be discussion on the policy implications or management interventions to address the identified issues and concerns.
	24	Are there maps showing the location of threats, biodiversity, and ecosystem values in and adjacent of the protected area and graphs showing trends, if available?	Partly Yes	Maps on biodiversity, values and threats is presented in pages 13-15. However, the said maps should provide further description and discussion.

Section		Guide Questions	Yes/No	Remarks
Vision, Goals, and Objectives				
	25	Are objectives specific, measurable, achievable, relevant and time-bound (SMART)?	No	The objectives are not measurable and not time-bound. There are no indications when and how will the objectives be achieved.
	26	Are there objectives that refer to: (1) ecosystem services values, (2) biodiversity, (3) social, and (4) threats and pressures?	Yes	
	27	Are there objectives that refer to biodiversity-friendly development potentials (e.g., community-based, enterprise, irrigation)?	No	The objectives do not explicitly refer to the biodiversity-friendly development potential. It was noted that the activities that may be engaged is in the form tourism (scuba diving) and research and the annual conservation fee being collected by the Park is being shared annually to the LGU of Cagayancillo to provide funding for community-based livelihood projects as cited in item 2 of page 24 of the Plan.
	28	Is each objective/desired result fully achievable based upon its supporting programs and activities?	Partly Yes	Not all objectives/desired results can be fully achieved since most are not measurable and not time-bound, e.g. 3rd bullet objective which is "To support global conservation goals"
Management strategies, interventions and activities				
	29	Are various strategies/options for addressing threats/pressures/issues/concerns identified and adequately addressed?	Yes	
	30	Did the selection of the management strategies and policy interventions consider the category of the protected area?	Yes	
	31	Have climate change adaptation and disaster risk reduction measures been integrated into the formulation of management strategies?	No	Provide discussion on the integration of climate change adaptation and disaster risk reduction measures in the management strategies since climate change is one of the significant threats identified.
	32	Are there discussions on gender and development and IP concerns?	No	While TRNP uninhabited, concerns on gender and development may be incorporated in the plan. This concern may be focused with the TRNP Management Office needs relative to gender and development
	33	Are there specific strategies and interventions dealing with existing development (e.g., infrastructure, facilities, etc.)?	No	The establishment of the new TRNP ranger station should be part of the strategies particularly under Program: "Biodiversity and Habitat, Protection, Research, Monitoring and Restoration"
	34	Does the plan have a management zoning map?	No	The draft Plan does not provide a management zoning map since the entire TRNP is a "no take zone"
	35	Was the protected area boundary delineated/demarcated?	Yes	
	36	Do the strict protection zones cover at least 20% of each ecosystem type (e.g., 12 forest types, fringing reef, barrier reef, mudflat)?	Yes	The entire TRNP is a "no take zone", though research and tourism is being allowed in seasonal basis and in limited location
	37	Is it clear what activities are prohibited/permitted/allowed in each zone (and sub- zone, if any)?		
Human Resources and Institutional Arrangements				
	38	Is there an organizational structure presented and described in the plan?	Yes	
	39	Is there a discussion on the functions and responsibilities of the key units in the organizational structure?	Partly yes	The functions of PAMB as well as the PAMO in general were provided in pages 27-31. The functions of other key units in the organizational structure should be enumerated or to fully discussed.
	40	Are there specific measures enhancing the capacity of PA staff as well as communities as de facto managers?	Yes	

Section		Guide Questions	Yes/No	Remarks
	41	Are the human resources (quantity and capacity) required quantified?	Partly Yes	The discussion on the human resources in the draft plan is provided in page 26, however, it should also provide dicussion on how to capacitate the staff of the TMO.
	42	Are the sources for bridging the gap between currently available and required human resources clearly indicated?	No	The current organizational structures presented in page 26 and the proposed one in page 30 should provide discussion particularly on how the gaps on human resources of the current manpower will be addressed by proposed organizational structure
	43	Are the human time inputs and financial budgets for each activity realistic?		
	44	Have the potential contributions/roles of the various sectors (e.g. NGOs, academe, religious groups, etc.) been taken into account in the planning of conservation advocacy and protection?	Yes	
	45	Is there a coordination and networking mechanism established with the academe and indigenous peoples, if any?	Yes	
	46	Have the responsibilities for the various outputs clearly defined and have the requirements for delivering them been committed by those responsible for the outputs?	Yes	
Logical Framework				
	47	Are the logical framework matrix and activity based cost adequately presented, discussed and included in the annex?	Partly Yes	Logical Framework forms part of the draft plan as provided in page 32 but this should be further review particularly on its objectives whether these are the specific, measureable, achievable, relevant and time-bound (SMART)
	48	Does the objective tree/log-frame have a clear and logical basis on a hierarchy of cause-effect chain?		
Financial Plan				
	49	Was there an analysis of the needed finances relative to the usual (e.g. past 5 years) or guaranteed financial inputs?	Yes	Financial Plan provided is an output of the PA Financial Planning Workshop organized by the BMB and BIOFIN.
	50	Is the plan budget requirement realistic?	Yes	
	51	Are there realistic plans to bridge any shortfalls/differences (e.g. generation of resources, complementation and streamlining of multiple plans)?	Yes	
	52	Have implementation arrangements for the plan been defined?	Yes	Financial Plan provided is an output of the PA Financial Planning Workshop organized by the BMB and BIOFIN
	53	Is there an implementation work plan which includes a breakdown of the proposed 5-year plan?	Yes	
Monitoring and Evaluation				
	54	Is there a monitoring plan matrix that includes outcomes, outputs, activities, inputs, identifying clear indicators, frequency, method, where to monitor, and responsible person?	No	The monitoring and evaluation in page 47 only mentioned that METT will be administered but does not answer concerns regading the communications strategies and state of the PA reporting, the process of adjusting the plan based on the monitoring evaluation. Please be corrected that the METT is being administered every three (3) years.
	55	Have communication strategies been identified, including the state of the protected area reporting?		
	56	Has the process for adjusting the operational plan based upon monitoring and evaluation results been made clear?		