

Stakeholder Engagement and Management Plan

of the

Philippine Reclamation Authority

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I. Introduction

Originally established as the Public Estates Authority in 1977, the Philippine Reclamation Authority is the agency of government that has been tasked to ensure a coordinated, economical and efficient reclamation of lands. It is governed by a Board of Directors composed of a chairman and five members, including the General Manager as an *ex-officio member* (now six including the GM & CEO; and note that EO 564 provides for the increase of the number of Board members from five to seven including the GM as an *ex-officio member*). All of them are appointed by the President for a one-year term as provided under R.A. No. 10149. A Chief Executive Officer is elected annually by the members of the board from among its ranks and is considered the highest-ranking officer. The General Manager manages the day-to-day operation of the agency. He is assisted by five assistant general managers - for Reclamation and Regulation; Legal and Administrative Services; Estates Management; Land Development & Construction Management & Technical Service; and Finance. In addition, the offices of the Special Projects and Joint Ventures Department; Subsidiaries and Development and Monitoring Department; the CORPLAN Department, the Office of the Corporate Secretary and the Internal Auditor provide support to the operations and activities of the agency. The organizational chart of the PRA is provided below.

PRA MANDATES

- Regulatory & Proprietary Land Reclamation
- Infrastructure Development
- Public Estates Development & Management

Source: PRA Website

As a government owned and controlled corporation, the PRA has corporate and proprietary powers. It can reclaim land, including foreshore and submerged areas; develop and dispose idle public lands; improve, administer and/or operate lands belonging to, managed and/or operated by the Government; enter into contracts and loan agreements with private, public or foreign entities and exercise the right to eminent domain in the name of the Republic of the Philippines, among many others.¹ Thus, the PRA is a crucial development arm of the government by creating land assets for the government and converting them into valuable and income generating real estate properties. Currently, it is attached to the Department of Environment and Natural Resources (DENR).

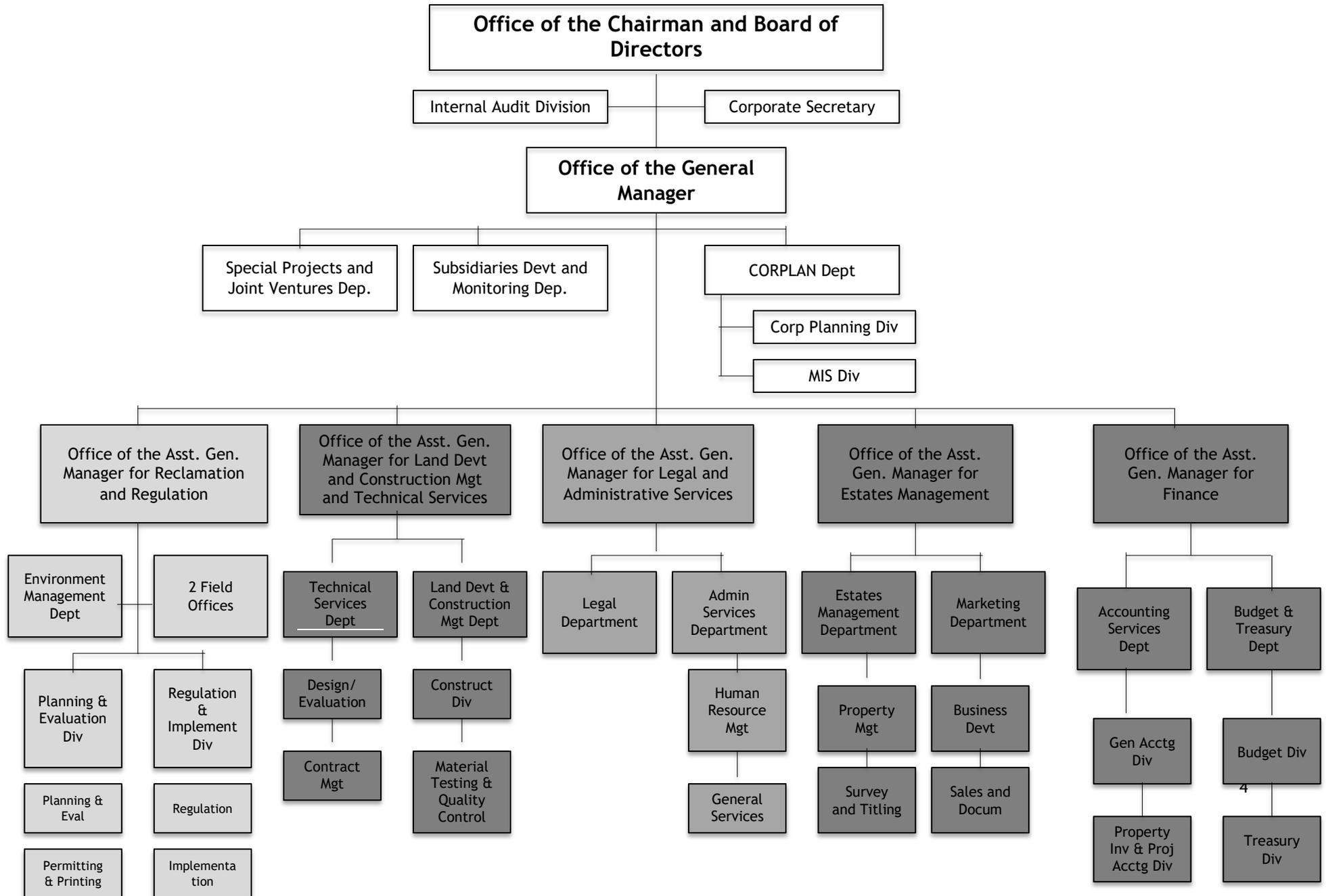
In addition to proprietary functions, the PRA is given regulatory powers.² Presidential Decree No. 1084 intended it to be the primary clearinghouse for all reclamation projects in the country and, as such, has the power to issue “such regulations as may be necessary for the proper use by private parties of any or all of the highways, roads, utilities, buildings and/or any of its properties and to impose or collect fees or tolls for their use.”³

¹ Sec.2, PEA Charter, P.D. No. 1084, 04 February 1977; see also Executive Order No. 525, 14 February 1975.

² Sec.3 and 5, PEA Charter, *ibid.*

³ Sec. 4(k and p), *ibid.*

Organizational Chart



II. Regulatory Framework and Requirements

PRA's regulatory power to approve reclamation projects is shared with the Department of Environment and Natural Resources (DENR) and other agencies of government. While the PRA gives the initial authorization on all reclamation projects, subject to the final approval of the NEDA Board, it is the DENR that issues, upon PRA request, the required permit for clearing the proposed site of the reclamation project (area clearance). After reclamation, the DENR, together with PRA, likewise undertakes the survey of the reclaimed land and endorses the matter to the Office of the President for the issuance of a Presidential Proclamation declaring the reclaimed land as alienable and disposable land of the public domain, as well as for the eventual issuance of special patent and title.⁴

More importantly, the DENR is the agency that processes applications for the issuance of the Environmental Compliance Certificate (ECC), a mandatory requirement before any environmentally critical project can proceed. The country's Environment Policy requires all agencies and instrumentalities of the national government, including GOCCs like the PRA, as well as private corporations firms and entities, to prepare, file and include a detailed Environmental Impact Statement in every action, project or undertaking that significantly affects the quality of the environment.

Major reclamation undertakings have been identified by law as environmentally critical and, thus, require the conduct of environmental impact assessment (EIA), which is a process that involves predicting and evaluating the likely impacts of a project (including cumulative impacts) on the environment during construction, commissioning, operation and abandonment. More relevantly, it includes designing appropriate preventive, mitigating and enhancement measures addressing these consequences to protect the environment and the community's welfare.⁵ Hence, during the EIA process and the conduct of hearings for the issuance of an ECC, the PRA is legally mandated to engage with its stakeholders particularly the communities that might be affected by a proposed project.

The PRA likewise consults, as a matter of policy, with various departments of the national government, as well as with affected local government units (LGUs) and relevant government agencies.⁶ Clearances and other permits are also required to be secured from the Department of Public Works and Highways, Department of Tourism (DOT), Department of Health (DOH), Philippine Ports Authority (PPA) and Bureau of Fisheries and Aquatic Resources (BFAR), to name some, to enable the PRA to continue with the implementation of proposed projects. A more detailed illustration and explanation of the roles of various stakeholders is provided under the section on *Stakeholder Identification and Analysis*.

⁴ Executive Order No. 672 (October 19, 2007).

⁵ Revised Procedural Manual for DAO 2003-30.

⁶ PRA website, <http://pea.gov.ph/hidden/83-mandates-and-functions>.

These consultations, however, are primarily driven by regulatory requirements and tend to become a one-time set of public meetings typically revolving around environmental, technical and social concerns. As such, it rarely extends in any meaningful way beyond the project-planning phase (unless it concerns post-reclamation remedies for communities or sectors) and is seldom integrated into PRA's policy making processes or measured in terms of its effectiveness in building constructive working relationships with PRA's stakeholders.⁷

Thus, despite previous efforts to "consult" stakeholders, PRA currently does not have a well-established system for engaging and managing stakeholders. Functionally, it does not have a unit, whether *ad hoc* or independent, particularly in charge of this task, as evidenced by the organizational chart above. While consultations have been held in the past, engagement with stakeholders had been desultory and oftentimes *ad hoc*.⁸

⁷ Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, International Finance Corporation (2007).

⁸ Interviews with PRA officers and staff. Note, however, that this has not always been the case. Prior to its reorganization, the PRA (then PEA) had a department and public relations unit that had been specifically tasked to interface with stakeholders and the public in general.

III. Rationale and Objectives of the SEMP

The absence of an institutionalized approach to stakeholder engagement has affected public perception of the PRA and its mandate, creating and propagating a widespread but mistaken belief that PRA exists primarily for profit and is not concerned about the impact of its projects to the environment, the affected communities and some sectors of the society (e.g. fisher folk and urban/rural poor). To a large extent, this was triggered by the negative publicity generated by the PEA-Amari controversy,⁹ the highly critical statements of certain political personalities and civil society organizations and certain groups that identify themselves as cause oriented but whose main agenda is in reality to block, oppose and publicly campaign against any reclamation project, regardless of its merits. A major contributor, however, to this negative public perception is the absence of a system for engaging, consulting and informing the PRAs stakeholders.

It is for this reason that this Stakeholder Engagement and Management Plan (SEMP) was developed. It is envisioned that the SEMP will enable the PRA to determine stakeholders' concerns, issues and feedback and integrate them into PRA's decision-making process – i.e. all throughout the project identification, implementation and post-reclamation stages. In addition, the adoption of this SEMP is in line with PRA's commitment under the Performance Agreement that it entered into with the Governance Commission for GOCCs (GCG).¹⁰ Part of said commitment is to integrate stakeholders' concerns regarding reclamation projects, with the corresponding performance indicator and institutional mechanism to determine said concern.¹¹ The PRA articulates its rationale for engaging stakeholders, as follows:¹²

A. Education/Information Awareness

- to inform the public of the benefits of reclamation projects
- to create/raise stakeholders' awareness and understanding of the mandate of PRA
- to generate informed and positive opinion about PRA activities
- to build stakeholders' trust in the PRA
- to educate stakeholders on PRA processes when undertaking land reclamation

⁹ In 2002, a case was filed against the PRA (called Philippine Estate Authority then) questioning the Joint Venture Agreement it entered into with a group of foreign investors. The Supreme Court declared that the land deal on and around Freedom Island in Manila Bay was null and void because it was unconstitutional. The full text of the law can be found in Chavez vs. PEA and Amari Coastal Bay Development Corporation G.R. No. 133250 (July 9, 2002).

¹⁰ The GCG is the central advisory, monitoring, and oversight body with authority to implement and coordinate policies for the GOCC sector. See <http://www.dbm.gov.ph/wp-content/uploads/GAA/GAA2015/GAA%202015%20Volume%20I/OEO/K.pdf>

¹¹ Performance Agreement between the PRA and the GCG for CY 2015 (January 12, 2015).

¹² PRA Stakeholder Engagement Workshop, October 13-14, 2015.

B. Consult and Involve Stakeholders

- to determine/ find-out their concerns/issues about a project, and to address these concerns/ issues
- to better understand stakeholders' interests regarding PRA's undertakings and consider them in the preparation of plans (e.g. relocation plan, ground surveys, marketing plan and estates management plan)
- to involve stakeholders in the decision process and other relevant activities to establish a sense of shared responsibility in ensuring that the project is socially, environmentally, technically and financially sound
- to enable the PRA to produce well informed policies and decisions
- to institutionalize stakeholder engagement both as a mindset and as a mechanism
- to establish better working relations with the stakeholders and in the long term win their support
- to integrate stakeholders' views/perspectives in reclamation projects

C. Ensure project success

- to mitigate, minimize, and reduce, if not totally eliminate, opposition to reclamation projects
- to facilitate a more expeditious approval process/avoid delays in project approval and implementation
- to determine at the soonest possible opportunity the feasibility of the project given the various issues of the stakeholders
- to address the concerns of stakeholders for a smooth and speedy implementation of the project

In the implementation of the SEMP, the PRA will be guided by the principles of commitment, integrity, respect, transparency, inclusiveness and trust.¹³

PRA SEMP Guiding Principles

- **Commitment** is demonstrated when the need to understand, engage and identify the community is recognized and acted upon early in the process.
- **Integrity** occurs when engagement is conducted in a manner that fosters mutual respect and trust;
- **Respect** is created when the rights, cultural beliefs, values and interests of stakeholders and neighboring communities are recognized;
- **Transparency** is demonstrated when community concerns are responded to in a timely, open and effective manner;
- **Inclusiveness** is achieved when broad participation is encouraged and supported by appropriate participation opportunities; and
- **Trust** is achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values and opinions.

¹³ Stakeholder Research Associates Canada Inc, 2005, The Stakeholder Engagement Manual Volume 1: The Guide to Practitioners' Perspectives on Stakeholder Engagement, www.StakeholderResearch.com.

IV. Stakeholders Identification and Analysis

A. Definition of Stakeholders

For purposes of this SEMP, a stakeholder is any group or individual who can affect, or is affected by, an organization or its activities. It includes any individual or group that can help define value propositions for the organization.¹⁴ In identifying its stakeholders, PRA includes all locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.¹⁵

B. Identification of Stakeholders

The following have been identified as PRA stakeholders because of one or all of the following reasons:

- a. they are affected directly or indirectly by reclamation and related projects of the PRA;
- b. they have interests in a PRA project or activity
- c. they have the ability to influence the project's outcome, either positively or negatively.

Priority Stakeholders of the PRA

Stakeholder	Reason/s
1. The Office of the President/ NEDA Board	<ul style="list-style-type: none">▪ Can influence outcome as it gives the final approval to a reclamation project
2. DENR	<ul style="list-style-type: none">▪ Has interests in reclamation projects' compliance with environmental laws and regulations▪ has the power to issue clearances, permits and licenses in the pre, during and post reclamation phase of a reclamation project▪ can influence project outcome
3. Clearance Agencies (DOT, DOH, BFAR, PPA)	<ul style="list-style-type: none">▪ The timely or delayed issuance of license can affect the outcome of the project
4. LGUs	<ul style="list-style-type: none">▪ They are proponents of reclamation projects most of the time.▪ Can support or oppose a reclamation project located in their territorial jurisdiction.▪ Can greatly affect project timetable and outcome

¹⁴ The Stakeholder Engagement Manual Volume 1: The Guide to Practitioners' Perspectives on Stakeholder Engagement, UNEP and Stakeholder Research Associates Canada Inc, (2005) www.StakeholderResearch.com.

¹⁵ Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, International Finance Corporation (2007).

5. Government Financial Institutions	<ul style="list-style-type: none"> ▪ Delay in funding has impact on project construction and implementation and in meeting financial obligations of PRA
6. Informal Settlers/ Affected Communities/ Fisher folk	<ul style="list-style-type: none"> ▪ Lives and livelihood are affected directly or indirectly by reclamation projects of the PRA; ▪ Can delay project through the filing and pursuit of court actions – e.g. application for Writ of Kalikasan
7. COA	<ul style="list-style-type: none"> ▪ Adverse audit findings can delay the implementation of a project
8. Media, political personalities and Opinion makers	<ul style="list-style-type: none"> ▪ Can shape/affect public opinion and generate public support or opposition to a proposed or ongoing reclamation project.
9. Business Sector	<ul style="list-style-type: none"> ▪ Business interests may be affected directly or indirectly by reclamation projects of the PRA ▪ Can provide support or delay implementation of projects through legal maneuverings
10. Other government agencies' with mandate to reclaim	<ul style="list-style-type: none"> ▪ Can pose jurisdictional issues on who has authority to reclaim ▪ Can make it difficult for PRA to ensure a nationally coordinated, economical and efficient reclamation of lands
11. Church/ Interest and Environmental Groups	<ul style="list-style-type: none"> ▪ Can effectively shape public opinion ▪ Can delay or stop the implementation of a reclamation project through legal and political acts
12. SC and the judiciary	<ul style="list-style-type: none"> ▪ Can stop a project through judicial environmental remedies such as the issuance of a Temporary Environmental Protection Order (TEPO) and ultimately a Writ of Kalikasan
13. Contractors	<ul style="list-style-type: none"> ▪ Can delay completion of project due to non-compliance or mere partial/sub-compliance with contractual undertakings
14. DPWH	<ul style="list-style-type: none"> ▪ Can also pose jurisdictional issues against PRA and compromise efficiency of project implementation ▪ Can delay pre reclamation activities
15. DOTC	<ul style="list-style-type: none"> ▪ Can affect PRA's project targets and income

	<p>generation because of projects with a transport-facility element</p> <ul style="list-style-type: none"> Has interest in specific reclamation components of infrastructure projects that are within its mandate
16. GCG	<ul style="list-style-type: none"> As the central advisory, monitoring, and oversight body with authority to implement and coordinate policies for the GOCC sector, can stop or delay the implementation of reclamation projects; Has a major say on the grant of employee incentives for GOCCs depending on agency performance
17. Motoring public (toll ways)	<ul style="list-style-type: none"> Can initiate anti PRA sentiments and file legal actions.

C. Stakeholder Analysis and Mapping

The PRA conducted stakeholder analysis to examine the extent of stakeholders' ability to influence PRA's process and outcome, especially in project identification, implementation and post reclamation activities. The analysis also rated the support or opposition of the stakeholders using the following criteria:

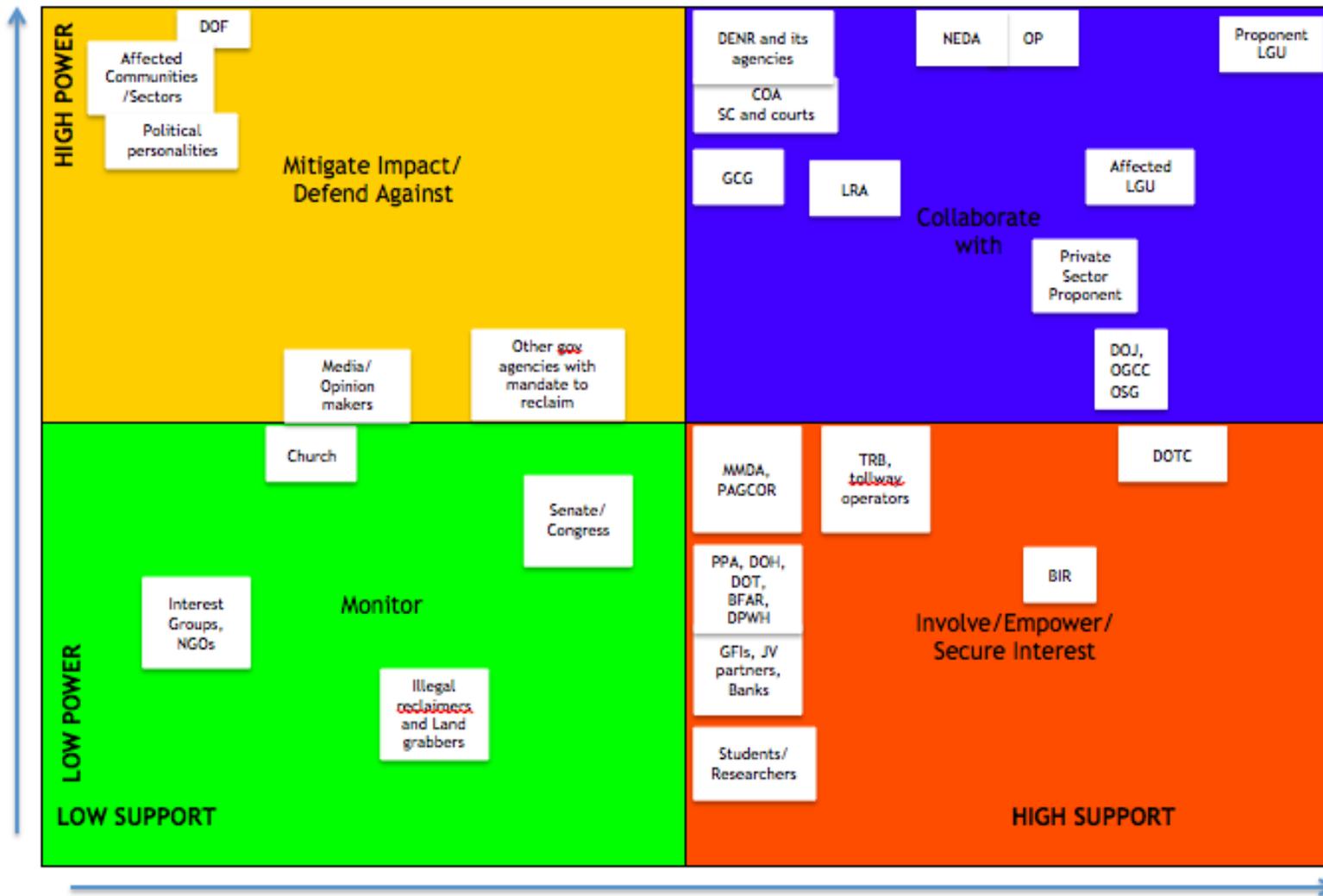
RATINGS FOR POWER AND SUPPORT	
POWER	5: High Capacity to formally and informally instruct change/damage reputation/disrupt process
	4: High Capacity to formally instruct change/damage reputation/disrupt process or Significant informal capacity to cause change, may have input/influence to decision-makers/regulators
	3: Some capacity to formally instruct change; must be consulted or has to approve
	2: Significant informal capacity to cause change, may have input/influence to decision-makers/regulators
	1: Relatively low levels of power; cannot generally cause much change
SUPPORT	5: Active Support: Provides positive support and advocacy for the plan/decision/company
	4: Passive Support: Support but not actively advocating
	3: Neutral: Is neither supportive nor opposed
	2: Passive Opposition: Will make negative statements/have negative opinion on plan/decision/company but will not do anything to affect its success and failure
	1: Active Opposition: Is outspoken against plan/decision/company and may even

act to promote failure and affect success

Source: Bourne, L. and Weaver, P. Construction Stakeholder Management. Blackwell Publishing, London, 2010.

Based on the power – support ratings, a stakeholder map was drawn to provide an easy guide for designing the appropriate stakeholder engagement. The map is divided into 4 basic engagement strategies – mitigate impact/defend against (for stakeholders with high power but low support), monitor (for stakeholders with low power and low support), collaborate with (for stakeholders with high power and high support) and involve/empower/secure interest (for stakeholders with low power but high support).

PRA Stakeholder Map



V. Stakeholder Engagement and Management Program

The stakeholder analysis presented above was used as the basis for formulating the appropriate engagement and management strategy.¹⁶

A. Mitigate impact/defend against

The PRA needs to mitigate impact/defend against the affected communities and sectors such as informal settlers and fisher folk, political personalities that are known for their stand against the agency and against reclamation (both project-specific and reclamation in general) and the DOF for its varying view on the mandate of the PRA. The media and opinion makers should also be monitored as they can be either an ally or opposition. These stakeholders are critical because they have high power and yet are perceived to be not supportive of PRA and of reclamation.

Stakeholders to Defend Against/Mitigate Impact

Stakeholder	Stage of Engagement	Level/s of Engagement	Objectives of Engagement	Engagement Strategy
Affected communities and sectors	Pre, during and post reclamation (All stages)	<ul style="list-style-type: none"> • Monitor • Inform • Consult 	<ul style="list-style-type: none"> • To be aware of their concerns • To inform them of the parameters of the project and to give them an opportunity to comply with the relevant laws, rules and regulations • To assure them that their livelihood will not be detrimentally affected 	<ul style="list-style-type: none"> • Engage in consultation, public meetings and consensus-building • Organize livelihood trainings and seminars • At times and when able, provide initial funding support for livelihood initiatives • Systematize/ institutionalize documentation and use of success stories and testimonials in favor of reclamation • Consult best practices on parallel CSR

¹⁶ For a more detailed explanation of the different levels of engagement, please refer to Annex "A".

				of other agencies
Political Personalities	All stages	<ul style="list-style-type: none"> • Inform 	<ul style="list-style-type: none"> • To make sure they are well informed of the measures being implemented by the PRA to address environmental , social and economic issues as well as livelihood concerns of affected communities • To assure that PRA exercises corporate social responsibility in undertaking its mandate 	<ul style="list-style-type: none"> • Public consultations, meetings, letters, conferences, press releases • Expert studies
Media and Opinion Makers	All stages	<ul style="list-style-type: none"> • Monitor • Inform 	<ul style="list-style-type: none"> • To make sure that print and broadcast media are well informed of the measures being implemented by the PRA to address environmental , social, economic and livelihood concerns • To assure that PRA exercises corporate social responsibility 	<ul style="list-style-type: none"> • Monitor media mentions; • Accommodate interviews • Release official statements • Develop an institutionalized communication strategy

			<p>in undertaking its mandate</p> <ul style="list-style-type: none"> • To seek the assistance of the media in informing and enlightening the public about reclamation projects and their concomitant issues 	
Other government agencies with mandate to reclaim	Pre reclamation	<ul style="list-style-type: none"> • Consult 	<ul style="list-style-type: none"> • To ensure that the relevant OGA complies with all the technical and environmental requirements for a reclamation project • To advocate for legally required consultation with PRA for reclamation projects/reclamation components of a project undertaken by these agencies 	<ul style="list-style-type: none"> • Submission of proposals, plans, specifications, letters • Make project presentations/ meetings • Identify, clarify & categorize nature of involvement and authority in reclamation projects • Ask NEDA for clear policy direction regarding relationship with OGAs that have the right to reclaim in the context of PRA's role and mandate under EO 525
Department of Finance	Pre and during reclamation	<ul style="list-style-type: none"> • Inform • Transact • Collaborate 	<ul style="list-style-type: none"> • To inform the department of the full merits of the project as 	<ul style="list-style-type: none"> • Promptly submit well-researched letters that are

			well as the potential revenues/dividends	responsive to any issue/s that may be raised <ul style="list-style-type: none"> Engage in a dialogue to clarify orders and issues that have been and will be issued and raised
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B. Collaborate with

The PRA has to continue collaborating with the following agencies because they are fully supportive and have the power and/or influence to impact PRAs work, either positively or negatively. They include the following – proponent and affected LGUs, the Office of the President/NEDA, private sector proponents, DENR and its attached agencies, GCG, LRA, COA, SC and DOJ and its attached agencies.

Stakeholders to Collaborate With

Stakeholder	Stage of Engagement	Level/s of Engagement	Objectives of Engagement	Engagement Strategy
LGU proponents	All stages	<ul style="list-style-type: none"> Collaborate Involve Transact 	<ul style="list-style-type: none"> To ensure that the project receives the full support of the proponent LGU To ensure that the proponent LGU clearly understands and shares the responsibility for the successful implementation of the project 	<ul style="list-style-type: none"> Enter into MOA with LGU Conduct Public Hearing in partnership with the LGU Meetings Consultations Project Presentation Clarify PRA'S Position on EO No. 146

Office of the President/ NEDA Board	Pre reclamation	<ul style="list-style-type: none"> • Collaborate 	<ul style="list-style-type: none"> • To convince the NEDA Board of the merits of PRA's proposed projects and its recommendations concerning said projects • To ensure that all queries and issues raised are addressed promptly and comprehensively 	<ul style="list-style-type: none"> • Detailed presentation of the technical merits of the project and of PRA's recommendations at the ICC and INFRACOM level • Engage in dialogues, consultations and meetings concerning reclamation issues and policies
GCG	All stages	<ul style="list-style-type: none"> • Transact • Collaborate • Inform • Consult 	<ul style="list-style-type: none"> • To continuously demonstrate the role and value of the PRA in socio-economic development • To ensure that PRA complies with its obligations under its Performance Agreement with the PRA • To ensure that PRA employees 	<ul style="list-style-type: none"> • Meeting • Consultation • Negotiation

			<p>are incentivized through the benefits on time</p> <ul style="list-style-type: none"> • To ensure continuous operation of the PRA 	
DENR	All stages	<ul style="list-style-type: none"> • Transact • Involve • Collaborate 	<ul style="list-style-type: none"> • To convince the DENR of the environmental and technical soundness of the proposed project • To assure DENR that PRA always complies with the legal, environmental, technical and regulatory requirements of reclamation projects • To find a way for the expeditious processing and issuance of permits and clearances 	<ul style="list-style-type: none"> • Enter into joint issuances/actions (e.g., Orders, MOAs, etc.) on matters of shares responsibility/jurisdiction • Undertake more PR initiatives • Ensure the quality of technical studies submitted • Undertake more coordination initiatives, to have face-to-face meetings • Undertake joint activities (e.g. joint ocular inspections) • Establish a database that contains the profile of key personalities
COA	Post transactions	<ul style="list-style-type: none"> • Transact • Consult • Involve 	<ul style="list-style-type: none"> • To assure COA that the PRA always complies with 	<ul style="list-style-type: none"> • Undertake pre-transaction consultations and meetings in line with COA's advisory capacity

			government accounting rules and regulations as well as with post-audit findings of the body	
Private sector/ Business proponents	All stages	<ul style="list-style-type: none"> • Remain passive 	<ul style="list-style-type: none"> • To ensure that the planning process includes impact assessment concerning affected business community 	<ul style="list-style-type: none"> • Hold meetings with affected business/industry representatives
Supreme Court and lower courts	All stages	<ul style="list-style-type: none"> • Remain passive 	<ul style="list-style-type: none"> • To anticipate legal issues concerning a project and ensure that the legal aspects of all projects are thoroughly reviewed • To ensure that all pleadings filed with the court are well researched 	<ul style="list-style-type: none"> • Hold case conferences within the office and with partners
DOJ and attached agencies	All stages	<ul style="list-style-type: none"> • Consult 	<ul style="list-style-type: none"> • To obtain official government guidance on legal issues concerning a project 	<ul style="list-style-type: none"> • Seek official legal opinions as the need arises

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C. Empower, Involve, Secure Interest

The PRA needs to involve or empower or endeavor to seek the interest of the following stakeholders because they can be effective allies – the clearance agencies (the DOT, DOH, BFAR, PPA, DPWH), TRB and toll way operators, MMDA, PAGCOR and the BIR.

Stakeholders to Empower, Involve, Secure Interest

Stakeholder	Stage of Engagement	Level/s of Engagement	Objectives of Engagement	Engagement Strategy
Clearance Agencies - DOT, DOH, BFAR, PPA, DPWH	Pre and Post Reclamation	<ul style="list-style-type: none"> • Transact 	<ul style="list-style-type: none"> • To assure these agencies that PRA always complies with regulatory and administrative requirements for the issuance of clearance and permits • To establish a good working relationship and rapport as well as a good coordinating mechanism with these agencies • To make these agencies aware of the importance of the speedy issuance of clearance and permits 	<ul style="list-style-type: none"> • Letters • Conduct of joint ocular Inspection • Meetings

			for the timely implementation of projects	
TRB/ Toll Operators	All stages for toll road projects	<ul style="list-style-type: none"> • Transact • Collaborate • Meeting 	<ul style="list-style-type: none"> • To ensure the smooth operation of toll roads • To avoid getting the blame for TRBs actions. 	<ul style="list-style-type: none"> • Letters • Meetings • Consultations • Surveys
DOTC, MMDA, PAGCO	All stages for some projects that also concern these agencies	<ul style="list-style-type: none"> • Transact • Collaborate • Involve 	<ul style="list-style-type: none"> • To ensure that the DOTC/MMDA/PAGCOR clearly understand the mandate and authority of the PRA • To ensure that the DOTC/MMDA/PAGCOR understand and are prepared to share the responsibility for the successful implementation of the project. 	<ul style="list-style-type: none"> • Enter into formal contracts and other agreements • Engage in consultations and dialogues
BIR	Post development	<ul style="list-style-type: none"> • Inform 	<ul style="list-style-type: none"> • To assure the BIR that the PRA complies with reportorial requirements and 	<ul style="list-style-type: none"> • Submit reports • Hold meetings

			proper and correct taxes are remitted	
GFIs, JV Partners, Banks	Pre reclamation	<ul style="list-style-type: none"> • Transact 	<ul style="list-style-type: none"> • To assure investors and other sources of financing from the government and private sectors of the financial, technical soundness of proposed project • To assure sources of funding that PRA is able to and will comply with lending terms and conditions • To assure that PRA complies with environmental laws, rules and regulations • To assure that PRA exercises corporate social responsibility in undertaking its mandate 	<ul style="list-style-type: none"> • Hold meetings and consultations • Enter into formal contracts and agreements
MMDA, PAGCOR	All stages	<ul style="list-style-type: none"> • Transact • Collaborate • Involve 	<ul style="list-style-type: none"> • To ensure effective coordination 	<ul style="list-style-type: none"> • Hold meetings and consultations • Enter into formal

			for income-generation purposes	contracts and agreements
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D. Monitor

At present they are not considered to be powerful or influential enough to affect PRAs operations and project. However, the following stakeholders need to be monitored as they have the potentials for negatively or positively affecting the operations of the PRA. Some of these stakeholders can also be negatively or positively affected by PRAs reclamation projects – the church, interest groups, NGOs, illegal reclaimers and land grabbers/informal settlers.

Stakeholders to Monitor

Stakeholder	Stage of Engagement	Level/s of Engagement	Objectives of Engagement	Engagement Strategy
Church	All stages	<ul style="list-style-type: none"> • Inform • Monitor • Consult 	<ul style="list-style-type: none"> • To assure the Church that the PRA takes into account the effect of its project on affected communities/families in its planning and implementation and the environment. • To assure the Church that the PRA implements mitigating measures to ensure that the concerns of affected individuals/sectors are properly addressed and resolved • To inform and educate the Church about the importance of PRAs work and the benefits that can be derived 	<ul style="list-style-type: none"> • Regular and prompt issuance of press releases as the need arises; • Develop position papers and draft letters to respond to issues raised and present the same to the relevant forum/fora; • Conduct informal dialogue with key church personalities and officers of the Bishops-Businessmen’s Conference of the Philippines (initially)

			therefrom	
Interest Groups/ Environmentalists	All stages	• Involve	<ul style="list-style-type: none"> • To assure them that the PRA takes into account in its planning and implementation the effect of its project on affected communities/families/sectors, as well as on the environment • to assure that the PRA implements mitigating measures to effectively address the concerns of those affected • To inform and educate these groups about the importance of PRA's work and the benefits that can be derived therefrom • To make sure they are these groups are properly informed of the relevant issues • To minimize opposition to projects and to prevent delay caused by misinformed opinion about the merits of the project 	<ul style="list-style-type: none"> • Hold public consultations • Issue press releases • Organize public forum/fora • explore partnership opportunities with identified critics
Senate and House of	All stages	• Inform	<ul style="list-style-type: none"> • To assure Congress that PRA complies 	<ul style="list-style-type: none"> • Submit letters, position papers • attend congressional

Representatives			with all laws and regulations, that it takes into account social and environment concerns in its planning and implementation of projects by promptly informing both Houses of PRA's positions, comments and recommendations on issues affecting the agency and its projects	hearings <ul style="list-style-type: none"> • Designate a legislative liaison officer • Prepare expert studies for possible presentations
Technical Experts	All stages	<ul style="list-style-type: none"> • Involve • Collaborate 	<ul style="list-style-type: none"> • To ensure that they are clear of the importance of their work in ensuring the technical viability, feasibility and acceptability of projects 	<ul style="list-style-type: none"> • Hold meetings • Hold consultations • Organize workshops
Land grabbers/illegal reclaimers	Pre reclamation	Passive	<ul style="list-style-type: none"> • To make them aware that PRA will not tolerate illegal activities 	<ul style="list-style-type: none"> • Undertake the prompt filing of cases and the initiation and pursuit of other legal remedies

VI. Resources and Responsibilities

The PRA's long-term approach for the implementation of its SEMP is to establish a unit (Community Relations) within the agency that will be tasked with this function. It is envisioned that this unit will have properly trained personnel on stakeholder engagement and management.

Given the urgency of the need to implement the SEMP, the PRA will in the meantime engage a consultant/s to serve as the manager for stakeholder engagement responsible for building and maintaining relationships with key stakeholders. Incumbent personnel of the PRA will assist him in the performance of the following tasks:

- Ensure that stakeholders are recognized as partners in the development and implementation of PRA's SEMP and other strategic goals.
- Advise the General Manager and his Assistant General Managers on issues and/or risks to stakeholder relationships as soon as they arise to ensure that the risks are mitigated or managed properly.
- Implement the PRA SEMP and take an active role in carrying out the stakeholder engagement activities in partnership with concerned departments within the PRA (i.e., facilitating forums or consultative events and liaising with appropriate stakeholder concerned)
- Ensure that the management and staff of PRA understand the value of – and are committed to – the genuine participation of stakeholders in the identification and implementation of reclamation projects.
- Develop a system for monitoring and evaluating the effectiveness of the SEMP.
- Come up with indicators to evaluate the effectiveness of SEMP strategies and revise them accordingly.
- Prepare and submit monthly, quarterly and annual reports on stakeholder engagement activities.
- Assist in resolving the concerns and grievances that a stakeholder may bring to the PRA.

VII. Grievance Mechanism¹⁷

The PRA will endeavor to address all the issues and concerns that will be raised by stakeholders even before they become actual grievances. Hence, the grievance process that the PRA will establish will not substitute for its SEMP. When grievances arise, however, PRA will use its grievance management system to address them. Hence, the SEMP and the grievance management will be complementary and reinforces each other.¹⁸

The grievance mechanism will seek to address the concern or complaint raised by an individual or group affected by the projects and

¹⁷ Patterned after the Grievance Management and Comment Response of the Stakeholder Management Plan of Dundee Precious Metal (December 2014).

¹⁸ Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, International Finance Corporation (2007).

policies of the PRA. These concerns and/or complaints may either be with reference to a real or perceived impact of PRA operation/s (e.g. activities of the PRA contractors, violations of the terms and conditions of the ECC, etc.) but do not include a question or suggestion given to the PRA or project and/or appeal or request for financial and other forms of assistance. The PRA is also cognizant of the fact that some grievances raised by certain sectors cannot be resolved because of their closed views about reclamation and/or when their business interests are affected. In these instances, PRA will instead design and implement a risk mitigation and management plan on case-to-case basis.

In developing the grievance mechanism, the PRA will be guided by the following objectives:

- To provide stakeholders with a clear process for providing comment and raising grievances;
- To allow stakeholders the opportunity to raise comments/concerns anonymously through using the community suggestion boxes to communicate;
- To structure and manage the handling of comments, responses and grievances, and allow monitoring of effectiveness of the mechanism; and
- To ensure that comments, responses and grievances are handled in a fair and transparent manner, in line with PRAs internal policies, international best practice and lender expectations.

The indicative steps for submitting and resolving grievance will include the following:

1. Submission of the complaint/grievance to the PRA
 - Submission of grievance will be made easy and accessible
 - Can be done during consultation or public hearings
 - Appropriate templates for reporting comments, complaints will be developed and made available
2. Logging the comment and creation of a grievance register
 - PRA will establish and maintain a grievance database register
 - All grievances that have been filed will be entered into the database
 - The database will be monitored by the General Manager and regular reports will be submitted to the Board of Directors
3. Determination if it is a valid grievance
 - Complaint will then be initially assessed by the SEMP manager to determine if it is a valid complaint
 - Suggestions, comments and requests for financial help are not considered grievance
 - Complaint for damages because of ongoing activities is a valid grievance
 - Non-compliance with the ECC terms and conditions is a valid grievance
4. Providing the initial response

- The person/community/stakeholder that lodged the initial grievance will then be contacted within 7 days to acknowledge that the PRA has received his grievance.
 - If not considered as a grievance, appropriate response will be given
5. Investigating the grievance
 - Grievance will be investigated, which should be completed within reasonable period of time from the time of receipt of complaint and depending on its nature
 6. Resolving the grievance
 - The person/community/stakeholder of the results of the investigation and If the investigation warrants it, appropriate measures will be implemented to address the grievance
 7. Taking further steps if the grievance remains open
 - If the grievance continues to persist, the SEMP manager will be tasked further investigation to determine additional steps to be taken.

VIII. Monitoring and Reporting

The PRA has an existing system for monitoring the implementation of its projects. Such system will be expanded to include monitoring of the implementation of the SEMP. In this regard, the PRA will develop measures and indicators that will take into account the level of understanding of PRA's mandate by its stakeholders; the number of grievances it has received and that have been addressed; and the level of stakeholder involvement in joint activities, particularly from those that have been directly affected. One of the major tasks of the consultant to be engaged is the development of the monitoring and reporting system.

Quarterly and annual reports on stakeholder engagement activities will be prepared and submitted to the Board and the GCG, if required. The consultant will prepare and summarize the SEMP results. This report will provide a summary of all public consultation issues, grievances and resolutions. It will also provide a summary of relevant public consultation findings from informal meetings held at community level. Copies of said report will be provided to the General Manager and the Assistant General Managers, and will thereafter be presented to the Board of Directors.

Annex “A”

Handout on Levels of Engagement¹⁹

Level	Goal	Communication	Nature of relationship	Engagement Approaches
Remain Passive	No goal. No engagement.	No active communication	No relationship	Stakeholder concern expressed through protest, letters, media, websites etc., or pressure on regulatory bodies and other advocacy efforts.
Monitor	Monitor stakeholders' views.	One-way: stakeholder to company.	No relationship	Media and internet tracking. Second-hand reports from other stakeholders possibly via targeted interviews.
Inform	Inform or educate stakeholders.	One-way: company to stakeholder, there is no invitation to reply.	Short or long term relationship with stakeholders. <i>"We will keep you informed."</i>	Bulletins and letters. Brochures, reports and websites. Speeches, conference and public presentations. Open houses and facility tours. Road shows and public displays. Press releases, press conferences, media advertising, lobbying.
Transact	Work together in a contractual relationship where one partner directs the objectives and provides funding.	Limited two-way: setting and monitoring performance according to terms of contract.	Relationship terms set by contractual agreement. <i>"We will do what we said we would"</i> or <i>"we will provide the resources to enable you to do what we</i>	'Public Private partnerships' and Private Finance Initiatives, Grant-making, cause related marketing.

¹⁹ The Stakeholder Engagement Manual: Volume 1: The Guide To Practitioners' Perspectives On Stakeholder Engagement

			<i>agree”.</i>	
Consult	Gain information and feedback from stakeholders to inform decisions made internally.	Limited two-way: company asks questions and the stakeholders answer.	Short- or long-term involvement. <i>“We will keep you informed, listen to your concerns, consider your insights, and provide feedback on our decision.”</i>	Surveys. Focus Groups. Workplace assessments. One-to-one meetings. Public meetings and workshops. Standing stakeholder advisory forums. On-line feedback and discussion.
Involve	Work directly with stakeholders to ensure that their concerns are fully understood and considered in decision making.	Two-way, or multi-way between company and stakeholders. Learning takes place on both sides. Stakeholders and company take action individually.	May be one-off or longer-term engagement. <i>“We will work with you to ensure that your concerns are understood, to develop alternative proposals and to provide feedback about how stakeholders views influenced the decision making process”.</i>	Multi-stakeholder forums. Advisory panels. Consensus building processes. Participatory decision making processes.
Collaborate	Partner with or convene a network of stakeholders to develop mutually agreed solutions and joint plan of action.	Two-way, or multi-way between company/ies and stakeholders. Learning, negotiation, and decision making	Long- term. <i>“We will look to you for direct advice and participation in finding and implementing solutions to shared</i>	Joint projects, voluntary two-party or multi-stakeholder Initiatives, Partnerships.

		on both sides. Stakeholders work together to take action.	<i>challenges.”</i>	
Empower	Delegate decision making on a particular issue to stakeholders.	New organizational forms of accountability: stakeholders have formal role in governance of an organisation or decisions are delegated out to stakeholders.	Long-term. <i>“We will implement what you decide.”</i>	Integration of Stakeholders into Governance Structure. (eg. As members, shareholders or on particular committees etc.)