

February 16, 2021

**HON. JEREMIAH BELGICA**

Director General  
ANTI RED-TAPE AUTHORITY  
Ground Floor HPGV Building,  
395 Senator Gil Puyat Avenue,  
1200 Makati City

Thru: **MR. ERNESTO PEREZ**  
Deputy Director General

Subject: **POSITION PAPER ON THE DEFERRED IMPLEMENTATION OF  
THE REVISED GENERAL EFFLUENT STANDARDS (GES) OF  
DAO 2016-08 ISSUED BY DENR**

Dear **Hon. Dir. Gen. Belgica:**

As a general consensus during the consultation forum with Department of Environment and Natural Resources (DENR), Anti Red-Tape Authority (ARTA) and the stakeholders, we are submitting herewith our position paper on the implementation of the DAO 2016-08, commonly known as “Water Quality Guidelines and General Effluent Standards of 2016”.

- Re: Dissolved Copper, Chloride and other Nutrients (Ammonia, Boron, Nitrate, Sulfate and Phosphate) Standards

We are glad to hear that DENR is amenable to suspend temporarily the implementation of the revised GES for the Dissolved Copper. We are hopeful for the result of this review since the study presented during the forum showed that a huge volume of sludge shall be generated to be able to achieve the mandated standard on Copper. Hence, the objective of protecting the environment is depleted.

For the Nutrients, although it was mentioned by DENR during the forum that 80% of the industries were complied, but the size and the loads from said industries are yet to be presented. Nevertheless, we believe that there is still a need for a holistic study regarding these parameters just like the dissolved copper. We hope that the Technical Working Group (TWG) would realize how stringent the Philippine standard is in comparison with the standards of our neighboring countries.

For reference, here are some of the standards from Japan and Korea with our proposed middle ground compromise standards.

<i>Parameter</i>	<i>DAO 2016-08 GES</i>	<i>Japan Standards</i>	<i>Korea Standards</i>	<i>Compromise Standards</i>
Copper	(Dissolved) 0.04 mg/L	2.0 mg/L	3.0 mg/L	2 mg/L
Boron	3 mg/L	10 mg/L	No limit	10 mg/L
Chloride	450 mg/L	No limit	No limit	No limit
Sulfate	550 mg/L	No limit	No limit	No limit
Ammonia	0.5 mg/L	32 mg/L	60 mg/L	32 mg/L
Phosphate	1 mg/L	8 mg/L	8 mg/L	8 mg/L

➤ Re: Compliance Action Plan (CAP)

The Philippine standards is one of the strictest compared to the standards of neighboring countries, which negatively affect operational costs of companies. Thus, we wish to recommend our proposed Compromise Standards as stated in the table above.

Furthermore, may we reiterate our humble request for an extension of grace period to at least one (1) year to give ample time to the industries in retrofitting their WWTF based on the result of the of the TWG review. Please take note that CAPs were submitted based on the revised GES which is being subjected to numerous deliberations and consultations.

The JCCIFI with all its members are with the regulators in protecting the environment. It would be great if DENR could defer the implementation of the revised GES for the whole duration of the pandemic. This will be a big relief to the industries who are already suffering in this very challenging time.

We would like to extend our appreciation to your office for taking the lead in hearing both the regulators and the stakeholders opinions.

Respectfully yours,



**NOBUO FUJII**  
Vice President & Executive Director