



**Annex A**

**CVA Vulnerability Analysis Matrix for ECC**

ACTIVITY	RESPONSIBLE UNIT/PERSON	OBJECTIVE	RISK FACTOR	LIKELIHOOD OF OCCURRENCE	SIGNIFICANCE OF IMPACT	CONTROL ACTIVITY/ MECHANISM	ASSESSMENT OF CONTROL OR SAFEGUARD	AREA FOR IMPROVEMENT
<b>Area: Issuance of Environmental Compliance Certificate (ECC)</b>								
1. Proponent inquires from the EMB officer of the day the necessity of or the requirements for ECC issuance	Proponent / Preparer	Determine whether proponent's project necessitates prior ECC issuance	Inaccurate information	Low	Low	DAO 2003-30 / ECC Procedural Manual	Needs continuous updating as to the coverable industries/projects	Deployment of EIS system updates to the action officers, LGUs and the public
2. Screening for ECC requirement coverage	EIA Division	Determine if ECC is required for project/ program undertaking and level of requirement	Inaccurate / insufficient screening /	Low	High	- DAO #30 series 2003 / Procedural Manual	Insufficient (for uncategorized projects)	Extensive IEC; continuous updating and deployment of the Manual
			uncategorized project	Low	High	- More detailed classification of projects/program s in existing Procedural Manual	None ("package deal system")	Information dissemination of requirement coverage
			"package deal system"	Medium	Low			Customized code of conduct for case handlers



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3. For projects not covered by the ECC requirement, proponent submits Project Description for CNC issuance and the granting or denial of CNC	Proponent	Justify issuance of certificate of non-coverage  Definitive determination of coverage/non-coverage	Inaccurate description  Non-validation	High  High	High  High	DAO 2003-30 / ECC Procedural Manual; hierarchy of review	Insufficient	Validation of description / information must be a matter of consistent procedure
4. For projects covered by IEE, submission of IEE Report or IEE Checklist	Proponent / preparer	Justify ECC issuance	Insufficient / inaccurate report/	Medium	Medium	DAO 2003-30 / ECC Procedural Manual; hierarchy of review	Insufficient (e.g. inadequate report templates)	Continuing updates for EMB-EIA personnel Provision of report templates for all types of projects
5. For projects covered by the EIS, proponent / preparer gives notice to the EMB for scoping session	Proponent / preparer	Request for scoping session	-	-	-	DAO 2003-30 / ECC Procedural Manual	Sufficient / operational	
6. EMB evaluates documents and validates completeness of stakeholder listing	EIA case handler	Determine faithful compliance with documentary requirements	Inadvertence / oversight	Medium	Low	Provision of checklist; DAO 2003-30 / ECC Procedural Manual; EIARC;	Sufficient and operational	Customized, values-based code of conduct



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for projects under EIS; for projects under IEE / IEE Checklist, procedural review of Report / checklist						hierarchy of review		
7. Selection of EIA Review Committee (EIARC) Members for Projects under EIS / Assignment of case handler / technical committee for projects under IEE Report / IEE Checklist	EMB-EIA Division	Ensure representation of required experts / ensure assignment to handler/ committee with required expertise	Risk of poor selection	Medium	High	-DAO 2003-30 -Code of Ethics of Committee members -Database/pool of experts	Sufficient and operational	Background investigation of EIARC experts - Policies on post employment  Raffling of application / projects, if possible; Team approach in case handling (committee type)
8. Proponent of EIS covered project gives project briefing	Proponent / preparer	To appraise EMB and EIARC of the nature of the project	Inaccurate / incomplete information	High	Low	Formal / site and technical scoping	Sufficient / operational	



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9. Conduct of formal / site scoping (or technical scoping where the document required is PEPRMP or EPRMP) for Projects covered by the EIS	Proponent / preparer	Determine/ Agree on the scope of EIA Study thru consultation w/ technical experts & stakeholders	Under-/Over-scoping	Medium	Medium	- DAO #30 series 2003 / Procedural Manual  - with Scoping Checklist of all requirements	Sufficient and operational	-Provision of sectoral scoping checklist
10. Proponent / preparer submits scoping report (or PEPRMP / EPRMP)	Proponent / preparer	To document formal / site scoping	Inaccurate / insufficient documentation	Low	Medium	Presence of case handler and / or EIARC; DAO 2003-30; ECC Procedural Manual	Sufficient and operational	
11. Signing of scoping checklist	Proponent / preparer; EIARC and EIA Chief	To set the scope of the EIA study	Inaccurate / incomplete checklist	Low	High	- DAO #30 series 2003 / Procedural Manual	Sufficient / operational	
12. Conduct EIA, preparation and submission of report	Proponent / preparer	Assess the env't impacts of dev't projects/ programs in line w/ ECC application	DENR personnel Involvement in EIA study report preparation	Medium	Medium	- DAO #30 series 2003 / ECC Procedural Manual	Sufficient policies and guidelines	Strict enforcement of the guidelines as required by EIS law and the DAO/procedural manual



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13. Procedural Review of EIS, PEPRMP, EPRMP, or IEE / IEE Checklist Report	Case handler / EIA Division	Determine completeness and sufficiency of EIA Study based on scoping agreements	-	-	-	DAO #30 series 2003 / ECC Procedural Manual  Scoping Agreements/Checklist	Sufficient and operational	-
14. If EIS is complete, proponent / preparer submits the EIS (10 copies) to EMB for substantive review by EIARC. In case of PEPRMP, EPRMP and IEE Report proponent / preparer submits 5 copies and for IEE Checklist Report 3 copies	Proponent / preparer	Submit report for substantive review	-	-	-	- - DAO #30 series 2003 / Procedural Manual	Sufficient	- Regularly monitor the processing cycle
15. Payment of processing fee (covers Project Category A, B and	-Proponent and EMB cashier (processing fee)	-Partly shoulder processing expenses	-	-	-	DAO 2003-30	Sufficient and operational	



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C) and MOA / payment of review fund (for projects covered by EIS, PEPRMP or EPRMP )	-Proponent and Fund Manager  -Some regions do not have fund managers)	-shoulder cost / expenses of review	-  Conflict of interest / objectivity impairment	-  High	-  High	DAO 2003-30 / Procedural Manual Review Work and Financial Plan DAO 2001-09	Sufficient and operational  Sufficient but not faithfully observed	Strict enforcement of the Procedural Manual especially on review fund management
16. Convening of EIARC for substantive review of projects covered by EIS, PEPRMP and EPRMP (except in Category B Projects)	EMB – EIA Division	Invite appropriate experts as EIARC members	-	-	-	DAO 2003-30 / ECC Procedural Manual	Sufficient and operational	-
17. Substantive review of the EIS, PEPRMP or EPRMP and request for additional information (AI -3) or the substantive review of the IEE	-EIARC for projects covered by EIS  -EIA Division for projects covered by IEE	Review results of the EIA Study as input to the processing of ECC applications	Superficial review  Conflict of interest  -Collusion with concerned case handler	Medium  Low  Medium	High  High  High	- EIA Review Manual  Hierarchy of review	Operational / sufficient	- Strict enforcement of the review manual; performance evaluation of EIARC Members



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Report and AI (1)								
18. Conduct public hearing if necessary or informal consultations in case of IEE Report	EIA Division / Project Proponent  Case handler / technical committee	Present results of the EIA Study and get inputs from community stakeholders	Political interference	High	Medium	Control measure in itself /DAO 2003-30 and ECC Procedural Manual	Insufficient	-IEC on the true / real intent of the EIS System
19. Conduct site inspection	-EIARC & Case handler (for projects covered by EIS, PEPRMP and EPRMP)	Site validation of submitted report on the results of the EIA Study	Risk of collusion among committee members and EIA personnel	Low	Low	DAO / Procedural Manual; Control measure in itself	Sufficient	-
	-Case handler for projects covered by IEE	Validate/walk through; informal consultation; conduct additional samplings/study	Risk of collusion between proponent and EIA personnel / objectivity impairment	High	High	DAO / Procedural Manual;	Insufficient	Strict enforcement of the guidelines Team approach; customized code of conduct for case handlers; additional personnel; logistical support; permanent designation of case handlers



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20. Submission of EIARC Report on substantive review for projects required to submit EIS, PEPRMP and EPRMP	EIARC Chairman	Consolidate substantive review findings and recommend action on ECC applications	-		None	EIA Review Manual	Sufficient	
21. Submission of Review Process Report by case handler	Case handler	To document the review process and draft recommendation on ECC application	Biased draft recommendation	Low	High	EIA Review Manual Hierarchy of review	Sufficient and operational	Close supervision by immediate superiors; capacity building for EMB in terms of skills enhancement and personnel complement;
22. Review by indorsing officials	EIA Division Chief (RO); EMB Director (CO); LLDA GM	Review draft recommendation	Undue influence of proponent	Medium	High	EIA Review Manual / hierarchy of review		Avoid proponent – reviewer interface in the recommendation-review process; customized code of conduct
23. Approval / denial of ECC ; confirmation of ECCs / CNCs processed by the LLDA	DENR Secretary (ECPs and LLDA-processed ECCs/CNCs)	To approve or deny ECC issuance based on the EIA Review	Political influence  Risk of undue delay	Project Category-dependent  High	High  Low	EIA Review Manual  DAO 2003-30	Insufficient in some project types / category	Strict enforcement of the guidelines, enhancement of transparency mechanisms





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	EMB RD (non-ECPs)							Revisit LLDA arrangement in ECC/CNC processing; strengthen EMB capability
24. Monitoring of compliance with ECC conditions / submission of monitoring report	EMB (CO and ROs); MMT; Proponent; 3 <sup>rd</sup> Party Audit	To determine level of compliance with ECC conditions	Absence of monitoring  Undocumented/unreported violation of ECC conditions	High (except in MMT and self-monitoring)  High (except in MMT)	High  High	EIA monitoring targets / Monitoring Templates / Reports	Sufficient but largely non operational	Increase number of personnel for monitoring; cascade monitoring and monitoring report templates
25. Discovery of violation and issuance of notice of violation / show cause order / cease and desist order (CDO)	Community; monitoring unit / EMB (CO and ROs); as to CDOs – Secretary, EMB Director or RD	To notify proponent of ECC violation						



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26. Submission of reply and conduct of technical conference / field validation / administrative investigation	Proponent EMB (CO and ROs)	To give proponent opportunity to be heard	Undue influence by proponent	Low	High	DAO 2003- 30	Sufficient and operational	
27. Approval of case decision document for the imposition of fines and penalties	EMB (CO and ROs)	To deter commission of ECC violations or operation without ECC	Unnecessary penalty reduction	Low	High	DAO 2003-30 Hierarchy of review	Sufficient and operational	
<b>REQUEST FOR ECC AMENDMENTS</b>								
1. Applicant files requests for ECC amendments	Proponent	Secure amendment of ECC conditions				DAO 2003-30		
2. EMB evaluates application	EMB (CO and ROs)	Determine whether amendment requested is major or minor in nature	Same as in application	Low	Nature-dependent	DAO 2003-30	Sufficient and operational	



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3. Approval or denial of the application / request	EMB (CO and ROs)	Determine whether amendment requested is major or minor in nature	Same as in ECC application	Low	Nature-dependent	DAO 2003-30	Sufficient and operational	
<b>REQUEST FOR RELIEF FROM ECC COMMITMENTS</b>								
1. Applicant files letter request for relief	Proponent							
2. EMB evaluates letter-request	EMB (CO and ROs)							
3. assignment of case handler or technical committee (if ECP)	EMB (CO and ROs)							
4. Approval or denial of letter-request	EMB (CO and ROs)	Determine whether amendment requested is major or minor in nature	Same as in ECC application	Low	Nature-dependent	DAO 2003-30	Sufficient and operational	