

## Minimum Considerations for the MBSDMP Proposed Line of Defence Strategy

### Context

The people and ecosystems in Manila Bay are under tremendous pressure from climate change, subsidence, coastal flooding and urban development. Parts of the coastal zone alongside Manila Bay are sinking into the ground due to the over extraction of water. Scientific studies looking at subsidence, coastal flooding and sea level rise data as well as community consultations conducted by PfR show that the land of Manila Bay is undergoing worsening flooding, that sea walls are being submerged and that walls and houses are unable to keep the water out.<sup>1</sup> To address these issues, the *line of defence* or *managed retreat strategy* has been proposed for northern Manila Bay within the MBSDMP. According to this strategy, the zone below this line will be used for the restoration of ecosystems such as mangrove forests and mudflats to manage natural flood zones in the wetlands. This could minimize the impact of flooding and coastal storm surges in inland areas. Through this restoration strategy, the MBSDMP is aiming to reduce flood risks and protect the lives and livelihoods of people living below and above the line. A resilience fund has also been proposed to assist communities and local governments affected.

The PfR Alliance believes that the proposed line of defence could have a positive impact on the environment within Manila Bay by providing a zone for restoration of ecosystems. Such an environmental buffer could play a critical role in reducing the impact of floods and providing safety to vulnerable people living in Manila Bay near the line of defence. Managed well, this strategy could enhance biodiversity as well as strengthen ecosystem based livelihood options for people living there. Therefore, ensuring safety from floods and addressing the needs for the most vulnerable groups should be central elements in the line of defence strategy.

As advisors on the social and environmental impacts of MBSDMP, the PfR Alliance considers the following issues as minimum considerations to be addressed under MBSDMP;

### General considerations

The line of defence strategy should be fully integrated within the coastal zoning management strategy of the MBSDMP. The established PAPs should be revised to align with the line of defence and subsequently managed retreat strategy, with associated strong social and environmental safeguards.

PfR calls for a clear and consistent **definition** and **terminology** around the use of the term the “line of defence”. Our recommendation is to call it a “line for environmental restoration” and to state very clearly that this is not a hard line (read embankment) to guarantee safety for those living above the line.

PfR would like to see **increased participation** at all levels in the planning process. Specifically,

- Local stakeholders (including local government, CSOs, People’s Organizations) should be meaningfully engaged in analysis of risks and strategy building on the line of defence.

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<sup>1</sup> Rodolfo, K., Siringan, F., et. al., *Worsening floods around northern Manila Bay, Philippines: Research-based analysis from physical and social science perspectives*, 2003  
<[https://www.researchgate.net/publication/229085804\\_Worsening\\_floods\\_around\\_northern\\_Manila\\_Bay\\_Philippines\\_Research-based\\_analysis\\_from\\_physical\\_and\\_social\\_science\\_perspectives](https://www.researchgate.net/publication/229085804_Worsening_floods_around_northern_Manila_Bay_Philippines_Research-based_analysis_from_physical_and_social_science_perspectives)>



- A comprehensive and participatory mapping exercise should identify who will be impacted by the line of defence, how they will be impacted, and what their existing conditions are.
  - Community organizations and alliances should be involved to create local engagement and action around the line of defence strategy, in cooperation with existing key stakeholders of MBSDMP.
  - Adequate time and resources need to be allocated to ensure meaningful engagement of local communities in the risk assessment, analysis, dialogues. The outcomes of such engagements should be used as a basis for additional planning and local contribution towards the master plan.
- The MBSDMP process must have a clear strategy to take these contributions into account in the master planning process.

### Environmental considerations

In order to address the root causes, the MBSDMP should provide for a clear direction on how to deal with **over-extraction of water**. Solutions to problems of water extraction should also be developed jointly with impacted people and local actors. In addition, river protection strategies must be aligned with the approach to address coastal and water management problems.

The zone below the line should be used for the restoration of ecosystems. The MBSDMP needs to integrate and specify the **intended use of the zone below the line** to avoid the misuse of the MBSDMP.

- MBSDMP should clarify the legal nature of the land zone below the line of defence and clarify that it should not be an 'easement' that restricts livelihood related activities.
- For PfR, reclamation activities below the line of defence would undermine the functioning of the proposed environmental buffers and would significantly undermine the proposed flood mitigation gains. MBSDMP should include clear guidance on land use, including reclamation in the areas around the line of defence.

**Strategic Environmental Assessments (SEA) and hydrological assessments** are required to detail the MBSDMP, and should be publicly available, and open for input from different stakeholders.<sup>2</sup>

- The MBSDMP should develop a specific PAP on strengthening the institutional set-up for SEAs and EIAs.

### Social considerations

In line with the risk reduction and ecosystem approach, principles related to safety from floods and other hazards, and principles related to addressing the needs of the most vulnerable, the following needs to be integrated in the MBSDMP;

- Communities are supported to make **informed decisions** on how to be safer from flooding and how to minimize impact on lives and livelihoods.
- **Access to basic services and social support** is available to both the population staying and those engaging in the managed retreat strategy.
- Targeted and transparently managed household level grants are available for those **staying below the line as well as to those relocating**, in order to support the poorest and most vulnerable affected households and communities based on poverty and population data through
  - Focused social assistance programs
  - Basic education and health care services
  - Safe, dignified, accessible (costs) and flood resilient housing options in appropriate safer zones where sufficient land, water, sanitation, safety and resources are available without putting additional pressures and increasing the vulnerabilities of already established communities and land.

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<sup>2</sup> As advised by the Netherlands Commission for Environmental Assessment  
<[https://www.eia.nl/docs/os/i72/i7233/7233\\_update\\_sea\\_mbsdmp\\_final\\_advice\\_20190830\\_incl.\\_cover\\_letter\\_-\\_reduced\\_size.pdf](https://www.eia.nl/docs/os/i72/i7233/7233_update_sea_mbsdmp_final_advice_20190830_incl._cover_letter_-_reduced_size.pdf)>



## PARTNERS FOR RESILIENCE

- Alternative, meaningful and sustainable livelihoods options with access to sustainable fishing and silviculture options within the line of defence, including provisions of livelihood support options such as retraining and livelihood start-up support.
- Available reimbursement and support for loss of livelihoods if people lose these options.
- **Relocation**
  - Must only be done based on informed consent. There needs to be a clear strategy on how to provide timely access to information and government support to the affected population. This could include a survey of people's views and aspirations for their future to inform the action planning for the MBSDMP.
  - The intended role of LGUs in the relocation should be explicitly stated. PfR advocates for the involvement of the LGUs in the development of solutions, including compensation for affected communities.
  - The concept of “stimulation” and “motivation” needs to be further defined within the MBSDMP, to ensure it will not be misused by other stakeholders.
  - Ensure that finances for relocation are not dependent on private sector goodwill. It is critical that finances for managed retreat will be part of public financing.

To anchor these principles in the MBSDMP, the PfR Alliance recommends:

- identification of **baseline data of people impacted by hazards and the line of defence strategy** to recognize and reduce vulnerabilities from multiple hazards. Ideally, this data should be gathered through participative risk assessments at local level. At a bare minimum, disaggregated data on who, what and when should be collected at a municipality/city levels.
- **disaster risk reduction capacities** should be built based on local consultations and local risk assessments, and should be integrated into the MBSDMP through a specific PAP responding to the findings.

PfR advocates for a twofold approach to integrate the safety and social principles in the MBSDMP;

1. They need to be anchored in existing **policy frameworks** and linked to clearly identified financing options.
2. They need to be enshrined within new financing solutions such as the proposed **resilience fund**, with the following minimum considerations;
  - the fund should be available to people leaving the zone below the line, and should also support adaptation solutions for people choosing to stay.
  - the financing mechanism for the fund should be agreed upon and specified within the MBSDMP. The finances should come from new and additional sources, and should not only rely on already existing mechanisms and funds.
  - fundraising for the resilience fund should be part of the overall fundraising strategy/ investment plan of the MBSDMP.

### Economic considerations

The MBSDMP should clearly define the mechanisms for the participation of and financing by **private sector parties**. At a minimum, the MBSDMP should ensure that all private sector investments are risk informed.

The MBSDMP should support the **establishment of and training for viable livelihoods alternatives** and sustainable ecosystem based activities for coastal communities – whether community members decide to stay or be a part of the managed retreat.

The PfR Alliance recognizes that sustainable livelihoods which depend on natural resources must be linked to environmental protection. Community members must be an active part of successful

environmental protection and sustainable livelihoods at most local level and should play a critical role in the implementation of the line of defence strategy.

### **Planning considerations**

The MBSDMP provides guidance for overall planning and development programmes, and is not associated with other large scale development programmes. Therefore, there is a need for a coherent communication strategy on the **association between the MBSDMP and other development programmes**.

- All mention on the Bulacan Airport should be removed from MBSDMP communication material.

The MBSDMP should specify how it will be **aligned with other planning instruments and strategies** at all levels - from large scale development programmes to local level government plans.

- Taking the landscape view, the MBDSP should be reviewed side by side with other risk assessments and development plans in the same river basin(s) and ecosystems.
- Meaningful consultation with key stakeholders (including vulnerable groups, fishermen associations, the urban poor, People's Organizations, LGUs including the different departments, planning, environmental resource management, disaster management and risk reduction as well as National Government Agencies offices present at the provincial and city/municipal level, and the private sector actors) at all levels is needed to create alignment between the different plans.

LGU ownership and engagement within the MBSDMP process is essential as they will form a critical part in the implementation of the MBSDMP. Increased analysis and action planning with LGUs is needed, to create understanding on the master plan and on the necessary trade-offs to create **alignment with local level plans**. Appropriate time and resources as well as a clear strategy for the integration of their feedback is needed.

- To address this, a new PAP should be developed which will focus on supporting (capacity and finances) LGUs to align their action plans with the MBSDMP. This should include cooperation among LGUs in shared landscapes.
- This PAP should be measured against other existing action plans and should include capacity support to the LGUs on the direction of the master plan and on how they can adjust and contribute to the master plan.