Marine Habitat Preservation of the Philippines Inc.
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Environmental and Social Safeguards Policy

How we avoid harm to people and nature in our work
Marine Habitat Preservation of the Philippines Inc. (Marine Conservation Philippines)

Version	1.0
Approved by the Board	October 2026
Next scheduled review	October 2028 at the latest
Policy owners	The Directors

1. Purpose and Scope

Marine Habitat Preservation of the Philippines Inc, operating as Marine Conservation Philippines (MCP), will avoid harm to people and nature throughout its work. Where harm cannot be avoided, MCP will minimise and mitigate it, then put right what remains.

This policy sets out how MCP identifies, manages, monitors and reports environmental and social (E&S) risks. It applies to:

- **All activities:** reef monitoring and research, support for Marine Protected Areas (MPAs), mangrove planting and fish pond reconversion, coastal and marine litter collection, youth education, capacity building for government dive teams and partners, PADI training, and the running of MCP's base in Zamboanguita.
- **All people working for or with MCP:** directors, staff, interns, scholars, volunteers, contractors and suppliers, and partners carrying out work on MCP's behalf.
- **All locations:** the municipalities of Negros Oriental where MCP works directly or through the BATASS and BATMAN alliances, and any new site MCP takes on.
- **All funded projects.** Where a donor or partner requires its own safeguards standard, MCP applies whichever standard is stricter.

2. Policy Statement and Commitments

MCP protects marine habitats with the coastal communities who depend on them, and for their benefit. It will not carry out conservation work that leaves those communities worse off. MCP commits to:

1. Comply with Philippine law and with the standards in Section 3, applying the stricter where they differ.
2. Screen every project and new activity for E&S risks before work begins, and decline anything on the exclusion list.
3. Follow the mitigation hierarchy: avoid harm first, then minimise it, then restore or compensate for what remains.
4. Respect human rights, including those of fishers and other resource users, women, children, Indigenous Peoples and other vulnerable groups.

5. Engage affected people early and honestly, and give them a real say in decisions that affect them.
6. Never carry out or support forced eviction, involuntary physical displacement, expropriation, forced labour or child labour. Any relocation MCP supports must be genuinely voluntary (Section 9).
7. Provide safe, fair and decent working conditions for everyone who works for MCP.
8. Keep a grievance mechanism available to anyone, free of charge and without retaliation.
9. Give the people responsible for safeguards the time, training and budget to do the job.
10. Monitor, report and learn, and update this policy as MCP's work and the standards change.

3. Legal Framework and Reference Standards

Philippine law is the floor. International standards fill the gaps, and where the two differ MCP applies the stricter.

Philippine law	What it governs in MCP's work
RA 7586 (NIPAS Act), as amended by RA 11038 (E-NIPAS Act, 2018)	Protected areas, including Apo Island Protected Landscape and Seascape, where MCP holds a seat on the PAMB
RA 8550 (Fisheries Code), as amended by RA 10654 (2015)	Municipal waters, fish sanctuaries and MPAs, mangrove protection and fish pond conversion
RA 7160 (Local Government Code, 1991)	LGU authority over municipal waters and MPA ordinances
RA 9147 (Wildlife Act, 2001)	Gratuitous permits for research and collection
PD 1586 (EIS System, 1978)	Environmental Compliance Certificates or Certificates of Non-Coverage for any construction
RA 9003 (Ecological Solid Waste Management Act, 2000) and RA 9275 (Clean Water Act, 2004)	Waste and wastewater on base and in the litter programme
RA 8371 (Indigenous Peoples' Rights Act, 1997)	FPIC and the rights of Indigenous Cultural Communities
RA 10066 (National Cultural Heritage Act, 2009)	Cultural heritage, including underwater finds
Labor Code (PD 442) and RA 11058 (Occupational Safety and Health Act, 2018)	Employment terms, wages and workplace safety
RA 7610 (1992), as amended by RA 9231 (2003)	Child protection and the prohibition of child labour
RA 7877 (1995), RA 11313 (Safe Spaces Act, 2019) and RA 9710 (Magna Carta of Women, 2009)	Sexual harassment, gender-based harassment and women's rights
RA 9208, as amended by RA 10364 and RA 11862 (2022)	Trafficking in persons and forced labour
RA 10173 (Data Privacy Act, 2012)	Personal data of staff, participants, community members and complainants

The main international references are:

- **World Bank Environmental and Social Framework (2017)**, Environmental and Social Standards 1 to 10, and the World Bank Group Environmental, Health and Safety Guidelines.
- **IFC Performance Standards (2012)**, which many CSR partners and funders still use.
- **Blue Action Fund ESMS (version 3, 2021)** and its ten Environmental and Social Safeguarding Principles, for projects supported by Blue Action Fund. This policy follows the same ten themes.
- **ILO fundamental conventions**: freedom of association, no forced labour, no child labour, equal pay and no discrimination.
- **FAO Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries (2015)** and the **UN Declaration on the Rights of Indigenous Peoples (2007)**.
- **Green Fins**, the code of conduct MCP's diving already follows.

4. Roles and Responsibilities

The Directors own this policy. Magnus, a Director, is the Safeguards Focal Point and manages its day-to-day application.

Role	Responsibilities
Board	Approves the policy and its revisions, receives the annual E&S report, and oversees serious incidents and grievances
Directors	Own the policy, decide risk categories and exclusions, approve safeguard plans, allocate budget, and handle grievance reviews and concerns involving management
General Managers	Apply the policy in daily operations: staff, base, contractors, procurement and health and safety. Own the Grievance Mechanism and keep the grievance log
Safeguards Focal Point	Screens activities, maintains the risk register, reviews environmental and social complaints in the grievance log each quarter, drafts safeguard plans, trains staff, and reports to the other Director and donors
Project and programme leads	Build E&S measures into plans and budgets, carry them out, and report problems early
Staff, interns, scholars and volunteers	Follow MCP's codes of conduct and report any concern or incident
Partners, contractors and suppliers	Meet the relevant parts of this policy through clauses in their agreements

The Safeguards Focal Point, or a project E&S focal person he appoints, is the donor's contact on E&S matters for each funded project.

To keep the role independent, grievances about the Safeguards Focal Point and appeals against his decisions go to the other Director, or to the Board. In funded projects, a project E&S focal person, such as Bethel for the mangrove project, may handle that project's day-to-day safeguards and reports to the Safeguards Focal Point.

5. Screening, Risk Assessment and Exclusions

Every new project, site or significant change in activity is screened before work begins. The effort that follows is proportionate to the risk.

1. **Exclusion check.** The Safeguards Focal Point checks the activity against the exclusion list below. Anything on it stops here.

2. **Screening.** A short screening form records the activity, location, people likely to be affected and likely risks, and assigns a risk category.
3. **Assessment.** Category B and B+ activities get an E&S assessment sized to the risks found, including talking to the people likely to be affected.
4. **Safeguard plans.** The assessment produces an Environmental and Social Management Plan (ESMP) and any other plans needed, with their costs included in the project budget.
5. **Implementation and monitoring.** Measures are carried out, tracked in the risk register and reported (Section 14).

Category	Meaning	What MCP requires	Typical MCP example
C, low	No adverse impacts, or only negligible ones	Screening record, grievance mechanism, stakeholder engagement	Reef monitoring, beach clean-ups, EFR and PADI training
B, moderate	Limited, site-specific impacts with standard fixes	Proportionate assessment, ESMP	Mangrove planting on reconverted fish ponds, small building works on base
B+, substantial	Higher-risk impacts in specific areas, such as restricted access to fishing grounds	Full assessment, ESMP, Process Framework for access restrictions	Supporting a new or expanded MPA or no-take zone
A, high	Diverse, irreversible or unprecedented impacts	MCP does not undertake Category A work	None

Exclusion list. MCP will not carry out, fund or knowingly support:

- Involuntary physical displacement, expropriation or forced eviction of anyone.
- Work on land or waters owned or claimed by Indigenous Peoples without their documented free, prior and informed consent.
- Destruction or significant degradation of critical or natural habitat, including planting mangroves on seagrass beds, mudflats or other habitats where they do not naturally grow.
- Introduction of non-native or invasive species.
- Forced labour, trafficked labour or employment of anyone under 18.
- Trade in wildlife or wildlife products regulated under CITES, or collection of corals, shells or other organisms beyond what MCP's research permits allow.
- Destructive fishing, or fishing gear and methods banned under Philippine law.
- Purchase of firearms, or funding of armed enforcement.
- Use or trade of banned or phased-out chemicals, pesticides or unbound asbestos.
- Any activity illegal under Philippine law or under international conventions the Philippines has signed.

For funded projects, the donor's own exclusion list applies as well.

6. Environmental Safeguards

MCP's own footprint must never undercut the habitats it works to protect. The detailed targets sit in MCP's Environmental Action Plan, which is reviewed alongside this policy.

Diving and research

- All diving follows Green Fins. Divers touch nothing underwater except litter during clean-ups.

- Divers complete buoyancy and survey training before they join survey dives.
- Specimens are collected only within the terms of MCP's research permits.
- Ghost nets and other debris are removed in ways that do not damage the reef beneath them.

Mangroves and habitat restoration

- MCP plants only native species suited to the zone, on sites where mangroves once grew, such as neglected fish ponds.
- MCP never plants on seagrass beds, mudflats or other habitats that are valuable in their own right.
- Before work on a fish pond begins, MCP confirms its legal status, its owner or leaseholder, and who currently uses it (see Section 9).
- Survival is monitored and recorded per site and per year.

Waste and pollution

- Waste on base is sorted at source. About half by weight is recycled, food scraps go to MCP's animals, and the rest goes to sanitary landfill. Nothing is burned in the open.
- Marine litter collected by MCP is sorted, weighed and handed to licensed or LGU waste systems.
- Fuel, oil and chemicals are stored safely, away from drains and the shore, with materials available to contain spills.
- Septic systems on base are maintained so wastewater does not reach the sea.

Resources and climate

- The kitchen serves mostly vegetarian food and no seafood on base.
- MCP is installing rooftop solar (67 panels of 500 W) and will apply for net metering.
- MCP reports the carbon cost of participants' flights honestly. It makes no claim that mangrove planting cancels it out.
- Projects consider typhoons, heat stress and sea level rise in their design.

7. Labour and Working Conditions

Everyone who works for MCP is employed on fair terms, paid fairly and kept safe. This covers up to 35 Filipino staff, including Pro Ocean collectors and casual workers, as well as contractors working on MCP's sites.

- **Terms of employment.** Every worker gets written terms in a language they understand, stating pay, hours, leave and benefits. MCP registers employees with SSS, PhilHealth and Pag-IBIG as the law requires.
- **Fair pay.** MCP pays at least the legal minimum wage, and casual workers receive more than the minimum. Litter collectors receive a wage rather than payment by the kilo.
- **No child or forced labour.** MCP employs no one under 18. No worker pays recruitment fees, surrenders identity documents or is kept from leaving.
- **Non-discrimination.** Hiring, pay and promotion are based on the job, without discrimination on grounds of sex, age, religion, ethnicity, disability, union membership or any other personal characteristic. MCP supports progression from intern or scholar to staff.
- **Freedom of association.** Workers may organise and bargain collectively without retaliation.
- **Health and safety.** MCP complies with the OSH Act, trains workers for the hazards of their jobs, provides the protective equipment needed, and records and investigates every incident and near miss. Everyone on base takes EFR first aid training.

- **Worker grievances.** Workers can raise concerns through the grievance mechanism in Section 13, or directly with a General Manager or Director, without fear of reprisal.
- **Contractors and suppliers.** Agreements require contractors to meet these same standards for their own workers on MCP's sites.

Volunteers and interns are not employees, but the health, safety, non-discrimination and grievance commitments above apply to them in full.

8. Community and Participant Health, Safety and Security

MCP's activities must not expose neighbours, partners or participants to avoidable risk.

- **Diving and training.** All diving follows PADI standards, Green Fins and MCP's own procedures, and every activity has a supervisor responsible for it.
- **Base activities.** Volunteers and interns do not undertake work that requires specialist skills or equipment, such as operating heavy machinery, using power tools or carrying out electrical repairs.
- **Transport.** MCP vehicles are maintained, driven by authorised drivers and used within their safe capacity.
- **Community events and children.** Activities involving children follow MCP's Child Protection Policy. Volunteers always work alongside MCP staff and are never left alone with children.
- **Emergencies.** MCP keeps emergency response plans for diving incidents, medical evacuation and typhoons, and shares relevant parts with local responders.
- **Construction.** All building work on MCP's sites follows a simple code of practice covering noise, dust, waste, worker safety and community safety.
- **Security and enforcement.** Security on MCP's sites is proportionate and respects the rights of community members. When MCP supports MPA enforcement, for example by training bantay dagat or government dive teams, it promotes lawful, proportionate and respectful enforcement and does not fund weapons.

9. Livelihoods, Access Restrictions and MPAs

MCP never forces anyone to leave their home or land, and takes responsibility for the loss of income its conservation work may cause. MPAs are established by LGU ordinance or national law, not by MCP, but MCP shares responsibility for the effects of restrictions its support helps bring about.

New or expanded MPAs and no-take zones. Where MCP's support contributes to new limits on fishing, gleaning or other uses, MCP will:

- map who uses the area, how they use it and how much they depend on it, paying particular attention to small-scale fishers, gleaners (often women and children) and others with few alternatives;
- involve those users in setting boundaries, rules and timing, and favour designs that avoid unnecessary loss, such as phased closures or keeping key fishing grounds open;
- prepare a Process Framework, agreed with the affected people and the LGU, explaining how remaining losses will be offset, for example through alternative livelihood support;
- monitor whether affected households are at least as well off as before, and adjust if they are not.

Mangrove sites and fish ponds. MCP works only with willing owners or leaseholders, under a written agreement. Before making any change, MCP identifies informal users, such as caretakers or gleaners, and agrees with them how their income will be maintained.

Existing MPAs. Where MCP only monitors or advises an MPA set up by others, it is linked to, not causing, any restrictions there. If MCP learns of unresolved hardship or conflict, it raises it with the LGU or the

Protected Area Management Board and uses its influence to help resolve it.

Voluntary relocation. In rare cases, such as a small island whose population has grown beyond what its land, water and reef can support, MCP may support voluntary relocation as part of a plan led by government and the community. MCP will do so only if:

- each household's decision to leave is its own, free of pressure, and can be refused with no penalty or loss of services;
- households that stay retain their rights, and nobody is forced out, including through expropriation;
- those who leave receive fair compensation at full replacement cost and help to restore or improve their income and living conditions;
- the community, through its own structures, gives free, prior and informed consent to the overall plan;
- a resettlement plan, agreed with the community, the LGU and the Protected Area Management Board, sets out eligibility, compensation, timing and monitoring;
- tenure rights under the E-NIPAS Act are respected, and the grievance mechanism remains available throughout.

10. Indigenous Peoples and Cultural Heritage

MCP works on Indigenous Peoples' land or waters only with their free, prior and informed consent (FPIC).

Indigenous Peoples. Screening for every new site includes checking with the National Commission on Indigenous Peoples (NCIP) whether it lies within an ancestral domain or is claimed by Indigenous Cultural Communities. If it does, MCP:

- follows the FPIC process under the Indigenous Peoples' Rights Act, with the community's own decision-making structures;
- agrees in writing with the community what the project will do and how benefits will be shared;
- respects customary use of resources and traditional knowledge, and uses that knowledge only with permission and credit.

Cultural heritage. MCP respects local customs, sacred sites and community events when deciding how and when to work. If divers or ground crews find wrecks, artefacts or human remains, they leave them untouched, record the location and report the find to the Directors, who notify the National Museum as RA 10066 requires. Work at that spot pauses until the authorities advise.

11. Gender, Inclusion and Safeguarding

MCP's work must benefit women and men, and the least powerful in a community, as fairly as everyone else.

- **Gender equity.** Assessments consider how women and men use marine resources differently, for example gleaning versus boat fishing. Women are consulted in their own right, with separate meetings where this helps them speak freely.
- **Vulnerable groups.** Engagement and benefits reach the poorest households, older people, people with disabilities and others who are easily overlooked.
- **Language and access.** Community meetings and materials use Cebuano or another local language, and meetings are held at times and places people can attend.
- **Equal opportunity.** MCP's scholarship programme and staff recruitment are open to all, and MCP encourages women to apply.
- **Sexual exploitation, abuse and harassment.** MCP has zero tolerance for these. Staff, volunteers and partners follow MCP's Safeguarding and Anti-Harassment Policy and Child Protection Policy, and concerns can be raised through the grievance mechanism.

- **Privacy.** Personal data from staff, participants, community members and complainants is handled under the Data Privacy Act.

12. Stakeholder Engagement and Disclosure

MCP talks to people affected by its work before decisions are made, and records who it spoke to and what changed as a result.

Who MCP engages. Fishers, gleaners and their people's organisations; barangay councils; municipal LGUs and their bantay dagat; the BATASS and BATMAN alliances; ENRD, DENR, BFAR and the Apo Island Protected Area Management Board; DepEd and schools; landowners and fish pond leaseholders; local businesses and dive operators; partners and donors.

How. Each funded project has a Stakeholder Engagement Plan and a stakeholder register. Engagement:

- starts at project design and continues through implementation and closure;
- uses local languages and formats people can follow, such as barangay assemblies, small group meetings and one-to-one visits;
- gives people enough information, and enough time, to form a view before they are asked for it;
- explains what was decided and why, including when MCP could not act on a suggestion.

Disclosure. MCP publishes this policy and its related policies on its website. Summaries of safeguard plans and grievance procedures are shared with affected communities in Cebuano. Monitoring results are shared with the LGUs and communities whose waters they describe.

13. Grievance Mechanism

Anyone affected by MCP's work can raise a complaint at no cost, anonymously if they wish, and without fear of retaliation. MCP's Grievance Mechanism, approved by the Board in October 2026, sets out the procedure in full. This section provides a summary.

Channels. In person at MCP's base, or with MCP's community liaison officers in the barangays where it works; by phone, WhatsApp or email; through the contact form on MCP's website; or by letter, which does not need to be signed. Concerns about MCP's management can go straight to a director. Concerns can be raised in English, Cebuano or Filipino, spoken or written.

Process.

1. **Record and acknowledge.** Every concern, however small, is entered in the grievance log maintained by the General Managers. MCP confirms receipt within three working days, or at once if the concern is raised in person, and explains who is handling it.
2. **Assign, within five working days.** Harassment, exploitation or abuse is handled under the Safeguarding and Anti-Harassment Policy, a concern about a child under the Child Protection Policy straight away, and fraud under the Anti-Fraud Policy. Anything else goes to a staff member who is not involved, appointed by a General Manager, or by a director if the concern involves a General Manager.
3. **Investigate.** This may involve talking with the complainant and others involved, visiting the place concerned or checking records.
4. **Respond** within 30 days, and usually much sooner, saying what was found and what MCP will do. If more time is needed, MCP explains why and when to expect an answer.
5. **Review.** A complainant who is not satisfied can request a review within 30 days. A director or Board member who was not previously involved looks at the matter again and replies within 30 days.
6. **Close** once the complainant accepts the outcome or the review is decided, and record what was learned.

The Safeguards Focal Point reviews environmental and social complaints in the log every quarter and adds any risks they reveal to the risk register.

Where someone may be at risk of serious harm, MCP acts at once. Complaints involving a possible crime, child abuse or sexual exploitation are referred to the proper authorities and handled under MCP's Child Protection and Safeguarding policies. Using MCP's mechanism never stops anyone from going to the barangay, the municipality, DENR, DOLE, the courts or a donor's own complaints channel.

14. Monitoring, Reporting, Training and Review

The Safeguards Focal Point monitors how well this policy works, reviews progress with the other Director every quarter and reports to the Board every year.

- **Risk register.** Open E&S risks, their measures and owners are kept in one register, reviewed quarterly with the General Managers.
- **Serious incidents.** A death or serious injury, an allegation of abuse or exploitation, major environmental damage or a serious community conflict is reported to the Directors within 24 hours, and to affected donors within the time set by their agreements.
- **Annual E&S report.** Covers screening results, safeguard plans in force, incidents, grievances and how they were resolved, training delivered and lessons learned. A summary goes into donor reports.
- **Training.** All staff, interns, scholars and volunteers are introduced to this policy at induction, in the detail their role requires.
- **Review.** The policy is reviewed every two years, or sooner after a serious incident, a change in law, a new type of activity or a new donor requirement.

15. Related Policies and Approval

This policy works alongside MCP's other policies, all listed on the website's policies page:

- Environmental Action Plan
- Child Protection Policy
- Safeguarding and Anti-Harassment Policy
- Grievance Mechanism
- Anti-Fraud, Anti-Corruption and Anti-Money Laundering Policy
- Anti-Slavery and Labour Standards Policy
- Ethical Volunteering Policy
- Privacy Policy

Item	Detail
Version	1.0
Policy owner	Directors, Marine Habitat Preservation of the Philippines Inc
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Next review	October 2028 at the latest

Source: Blue Action Fund, Environmental & Social Management System, version 3 (August 2021): basis for the risk categories, exclusion list, safeguard instruments and the ten safeguarding themes used here.