

# Sunk Costs

A Mega-Airport in the Path of Climate Disaster

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Photo by Basilio Sepe

Flights from one of the world's largest airport projects may be grounded within 30 years due to the risk of sinking land and rising sea levels, Global Witness finds.

Our new investigation reveals evidence suggesting that the \$15 billion New Manila International Airport (NMIA) is a “disaster-prone project” that leans on a drastically optimistic environmental projection.

Global Witness interviewed sources from the private sector, scientific community and from civil society who disclosed that San Miguel Corporation (San Miguel), the airport proponent, circumvented stricter environmental regulations by having the airport project classified as a land development. Construction has displaced 700 families—many without adequate compensation—and caused irreversible damage to one of the Philippines's most vital ecosystems.

Despite these failures, a Dutch state agency is insuring the project, and international banks such as ING, HSBC and Standard Chartered are funding the airport. Boskalis, a Dutch dredging giant involved in the construction, has ceased work on the project, apparently prematurely.

Our findings expose the NMIA's dire consequences for communities, ecosystems, and the region's future.

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## Introduction

Manila Bay, an endangered biodiversity hotspot, is now home to a massive infrastructure project that promises to redefine the Philippines. The New Manila International Airport (NMIA)—a \$15 billion endeavour poised to become the world’s third largest airport—is presented by its proponents as the country’s gateway to economic growth, increased tourism, and a solution to the overwhelming congestion of Ninoy Aquino International Airport.

Behind the promise of jobs and prosperity lies a much darker reality. In 2023, Global Witness [uncovered](#) serious flaws in the project, including a coercive consultation process that displaced over 700 families and caused significant environmental damage.

Our newest findings highlight even graver risks: within 30 years, experts predict the airport's runways could be flooded due to rising seas and the sinking coastline on which the project is being built. San Miguel Corporation, the developer, also appears to have bypassed stricter environmental regulations by describing the airport as a “land development”, avoiding a later [presidential suspension](#) of Manila Bay reclamation projects.

The project’s impact stretches far beyond the construction site: hundreds more are losing their livelihoods, while Manila Bay’s already strained ecosystem—one of the Philippines' most important coastal areas—now faces severe, potentially irreversible damage.

Our new investigation expands on earlier revelations through whistleblower reports, interviews with community members, scientists, government officials, and local organizations, alongside reviews of confidential project documents. We found that of the families displaced for the project, over half received no compensation, and many were pressured to demolish their homes and accept inadequate settlements.

Compounding these issues, we reveal that Boskalis Westminster N.V. (Boskalis), the Dutch dredging giant involved in building the land for the airport, has exited the project prematurely due to sand shortages, leaving the airport construction delayed and in limbo. Boskalis publicly indicated that the project proponents were committed to “hundreds of hectares of new wetlands” as part of an environmental mitigation plan, yet these pledges remain unfulfilled.

The Dutch state has supported and legitimised the high-risk airport project by providing insurance for Boskalis, despite the state-funded insurer itself identifying risks of “irreversible and/or unprecedented” environmental and social harms.

After having threatened the livelihoods of local communities and destroyed the surrounding environment, the airport could collapse under the weight of its ambition. With homes demolished, ecosystems in jeopardy, and the airport's future uncertain, questions remain about who will be held accountable for Manila Bay's decline.

A forthcoming European accountability law known as the Corporate Sustainability Due Diligence Directive (CSDDD) will require companies like Boskalis to comply with international human rights and environmental standards, and to engage meaningfully with communities impacted by their projects. Set to take effect for some enterprises in 2027, this law signals a clear call for companies like Boskalis to change their practices and meet higher accountability standards.

Despite this significant progress, the legislation continues to face backlash. Policymakers must safeguard the new law and resist efforts to weaken or compromise this critical advancement.

## Key Findings

- > **Flooding Risks:** Scientists suggest that the project's environmental impact assessment underestimates local sea-level rise, calling into question the airport's long-term viability.
- > **Displacement and Coercion:** Nearly 3,000 people appear to have been displaced to make way for the airport. Over half of affected families received no compensation, and those who received money report being pressured into demolishing their own homes and accepting insufficient settlements.
- > **Loopholes:** San Miguel seems to have bypassed stricter environmental regulations and avoided a 2023 presidential suspension on Manila Bay reclamation projects by describing the airport as a "land development" project.
- > **Delays and Broken Promises:** Dutch dredging firm Boskalis Westminster N.V., responsible for building the airport's foundation, appears to have left the project site prematurely due to sand shortages. Boskalis pledged the project proponents would develop "hundreds of hectares of wetlands" as an offset but has yet to fulfil these promises.
- > **Dutch Support:** The Dutch government legitimized the high-risk project through export credit insurance for Boskalis, despite risks of "irreversible and/or unprecedented" environmental and social harms.

## Shifting Sands

Rain pours down on Richard Arcana's stilt wooden home in Rosario. The small fishing village is roughly 60 km from the future airport site, but life there has been completely disrupted since the project began.

Children's drawings line the walls of the home's only room. Weather-worn fishermen enter in silence and settle onto the bare floor. Their voices are filled with bitterness.

***“We have gone through terribly difficult times because of Boskalis. Terrible hunger” says Teddy Florendo, one of the fishermen.***

Boskalis, a Dutch multinational company, has signed the largest contract in its history—worth €1.5 billion—to dredge the immense quantities of sand required and build artificial land for the airport.

This process, known as “land reclamation”, is commonly used by sprawling urban centers to create land for new developments by filling submerged areas with solid materials like sand.

The consequences for people and for the environment are dire. Fishermen like Richard and Teddy, who depend on the bay's fragile ecosystem for their livelihood, say the dredging operations have devastated the local environment and reduced their fish catch to alarmingly low levels. One of the project's Environmental and Social Impact Assessments (ESIAs) stated that approximately a thousand fishermen across eleven communities would be affected.

“They destroyed the waters here in Cavite to make a profit from something new”, says Jessie Prudente, another fisherman. “They destroyed the sea here. That's what happened”.

Boskalis' dredging ships operate like giant vacuum cleaners that suck sand from the seabed, which communities claim has left muddy, lifeless water behind. They say that marine life, including the fish vital to sustaining them, has dwindled. A United Nations Environment Programme (UNEP) representative warns that in some cases, sand-mining “sterilises” the ocean floor, and that life in the ocean [may never recover](#) from sand-mining activities if all sand is removed from the bedrock.

“When the water has turned murky, not only does it damage our livelihood, it also damages our families”, explains Rolando Lariosa, tightening his hand in frustration. “If we cannot earn a living, how can we support our families? We depend only on the sea”.

Fishermen also say their nets are frequently destroyed by dredgers, which often nearly collide with their fishing boats. “[Boskalis] even gave us life jackets”, says Nelson Lipaopao, a fisherman in the neighbouring village of Tanza. Philippine Coast Guard officials confirmed that collisions with dredgers occur.

Though fisherfolk are directly affected by the dredging activities, residents in Rosario and Tanza, towns in Cavite province, say they received no warning about the operations. “Even our mayor didn't tell us”, Nelson adds. “There wasn't even a, “Sorry, coastal residents. There will be ships dredging here”, there was nothing like that”.

Alongside environmental protection organisations, several fisherfolk fought for compensation from the companies. Fisherfolk in Rosario and Tanza say they eventually received some money-between \$41 and \$258 per month for a maximum of nine months-though they claim it is insufficient to cover

their needs. Nelson explains the monthly amount received from the company was equivalent to what he used to make in a day's work.

Now, residents say the fish are gone and they are struggling to catch a fraction of what they used to bring home. "They gave us nothing but suffering", laments Jessie.

San Miguel says it coordinated with the local government to identify affected fishermen and implement initiatives to assist them, including compensation for damaged fishing equipment and cash support to replace income lost for the duration of the dredging activities. San Miguel claims to have provided \$86 to boat owners and between \$41 and \$51 to boat crews in affected municipalities for the duration of dredging activities.

***"They gave us nothing but suffering"***

– Jessie Prudente, a fisherman living in Cavite province

## **A Sinking Foundation**

The destruction of Manila Bay's ecosystem is only part of the problem; the area where the airport is being built features major hazards. Rising sea levels, sinking land, and vulnerability to flooding, storms, tsunamis, and earthquakes present urgent risks, some of which Global Witness believes are dangerously underestimated in the project's assessments.

Rising sea levels, driven by climate change, are an immediate concern for the Philippines and the area around the airport site. Studies by the Oscar M. Lopez Center (OMLC), the Philippines National Oceanic and Atmospheric Administration (NOAA), the University of the Philippines Department of Geodetic Engineering and the National Mapping and Resource Information Authority (NAMRIA) estimate that sea levels in Manila are rising by 13-15 mm per year, nearly three times higher than the 5.3 mm calculated in the project assessments available on San Miguel's NMIA project website.

Dr. Rosalie Reyes, who led the Coastal Sea Level Rise (CSLR) project for the Philippines Department of Science and Technology, calls the disparity glaring. "I don't know how they came up with this figure", she said. "Our data shows a rise of 13mm/ per year based on tidal data from 1970 to 2020 in Metro Manila".

Olaf Neussner, a Climate Change and Disaster Management Specialist who has worked for United Nations agencies and the European Union, argues that the assessment also underplays how quickly the ground is sinking in the area and warns against the assessment's optimism.

"In the airport's feasibility study, the assumptions for sea-level rise and ground subsidence are very unrealistic", he said. "Within 30 years, high tides will probably start coming into the airport area. Decades from now, even normal tides could spill onto the runways. Storm surges and tsunamis could shut the airport down entirely for weeks. We're looking at a disaster-prone project".

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The issue is compounded by the site’s foundation. Reclaimed land along Manila Bay consists of soft, loose sediments, which can subside even faster under heavy loads. Neussner notes that the sheer weight of the airport infrastructure will likely hasten the sinking, amplifying existing risks.

Dr. Reyes also shares concerns about the airport’s impact, noting that it may worsen flooding for nearby communities. Private sector experts, as well as consultants in charge of the project’s impact assessment, have echoed these concerns. “The project’s mitigation measures seem more focused on protecting the airport itself”, says Reyes. “They want to raise the airport platform by three to five meters. That’s about two stories high. But residents in the surrounding areas don’t have the means to elevate their homes”.

These scientists’ concerns appear well-founded if we consider the parallel with Kansai International Airport in Japan. Built on reclaimed land with excessively optimistic engineering assumptions, the project faced [catastrophic flooding](#) less than 25 years after opening, when a typhoon overwhelmed its defenses. Manila Bay’s rapid sea-level rise and subsidence rates appear to place the NMIA on a similarly precarious trajectory.

Neussner notes that San Miguel is operating under a 50-year “build-operate-transfer” agreement with the government, during which the company is exempt from paying taxes. “It’s very likely that the airport will experience regular flooding by the time San Miguel hands over to the government”, he explains. He adds that the government may have to invest heavily in retrofitting the airport when it assumes the responsibility for the operations.

San Miguel claims to have comprehensively addressed the risks posed by the infrastructure's weight, by land subsidence and by sea-level rise in the airport’s final design, and disputes that any risk of future flooding is backed by scientific evidence.

The company also asserts that the airport’s elevation design was not based on the Mott MacDonald Social and Environmental Impact Assessment published on San Miguel’s website, but on a 2019 study by the Danish Hydraulic Institute (DHI) that is not publicly available. San Miguel declined to provide Global Witness with the DHI report. San Miguel stated that the DHI study incorporated Intergovernmental Panel on Climate Change (IPCC) global sea level rise projections, but it did not disclose the specific sea-level rise figures used or confirm whether local sea-level rise trends were considered.

The Philippines' National Mapping and Resource Information Authority (NAMRIA) reports that sea levels in Metro Manila are rising [nearly three times faster](#) than the global average. Accounting for



regional sea-level rise rates, which would not be reflected in the IPCC global mean sea-level rise figure, is crucial for accurately assessing flood risks. Global Witness believes that San Miguel has not adequately assessed regional climate change-induced sea-level rise risks relevant to the NMIA.

Additionally, the Mott MacDonald assessment noted that “potential land subsidence was not considered in the [2019] design water level assessment”. If land subsidence was also excluded from the DHI study and if the airport platform height was based on that study, this raises further serious concerns.

## Environmental Devastation

While future projections are concerning, some of the damage has already been done. According to the project’s own Impact Assessment, the airport site is classified as a Key Biodiversity Area, sites critical to sustaining the planet’s ecosystems.

In a report published with the Philippines government, international private sector experts cautioned that building the NMIA would permanently damage the site’s natural habitats. They emphasized that the only way to prevent this damage would be to build in other sites, away from the coastal areas of Manila Bay. Their report also noted that mitigating environmental impacts would require restoring at least 25,000 hectares of natural habitats—an area 75 times the size of New York’s Central Park.

Mangroves, groups of trees that grow in the water, play a critical role in protecting coastal communities from storms and flooding. Hundreds of mangrove trees were destroyed, in what residents suspect was preparatory work for the project. These trees contain the highest carbon density of all land ecosystems. Scientific studies have shown that mangroves sequester carbon at a rate two to four times greater than mature tropical forests. They also filter river water of pollutants and act as natural flood barriers, offering protection from storms and erosion.

“Mangroves are our natural defense”, explains Dr. Sandra Catane, a geologist who has studied the project’s environmental and social impact. “They act as barriers against typhoons and storm surges, but they’re being destroyed to make way for this development”.

The destruction of these ecosystems leaves coastal populations more vulnerable to natural disasters. Their absence exposes the coastline to even more severe damage from rising seas and extreme weather. Fish also rely on mangrove roots as breeding grounds, and they provide a stop for migratory birds. The developers committed to planting new mangroves as well as creating a platform where migratory birds can stop, to offset the loss of habitats.

However, scientists have complained that San Miguel was planting the wrong mangrove species, accusing San Miguel of “harmful, irresponsible and unscientific practices”. In 2021, the Philippines Environment Department ordered to stop mangrove planting while a monitoring team investigates the malpractice allegations.



**Mangroves in Manila Bay area, Basilio Sepe.**

Experts like Narod Eco, a researcher specialised in disasters and geohazards at the University of the Philippines, remain skeptical that the company’s actions will help mitigate the damage. “It’s just greenwashing. It’s a superficial fix for an irreversible problem”, he explains.

A member of the Philippines Coast Guard, which sits in the Philippine Department of Transportation, agrees. “They’re planting mangroves but that’s not enough. [...] The majority will still be lost”, he sighs.

San Miguel says that it received advice from the Department of Environment and Natural Resources to conduct further analysis on the mangroves site and species selection, and that after the necessary assessments and studies were completed, the project, in close coordination with all the relevant authorities, proceeded with its mangrove restoration activities.

Global Witness also interviewed sources from the private sector, the scientific community and from civil society who disclosed that San Miguel circumvented stricter environmental regulations by having the airport project classified as a land development. JanJaap Brinkman, Director of Deltares Singapore—a research institute specializing in water management and hydraulic engineering with extensive knowledge of the project—confirms that he has communicated this concern to the Philippines government.

***“Calling it a land conversion is obviously nonsense because dumping millions of cubic meters of sand into a permanently submerged area is, by any definition, reclamation”***

– Dr. Murtah Shannon, Senior Policy Advisor at Both ENDS

In 2023, the President also temporarily suspended reclamations nationwide, pending a review of their social and environmental impacts. However, by avoiding classification as “reclamation”, the airport project seemingly also bypassed the suspension and was allowed to proceed.

While San Miguel defended the “land development” categorisation by arguing that the airport site was once located above sea, scientists have shown that the site is now mostly submerged.

Dr. Murtah Shannon, Senior Policy Advisor at Both ENDS, says that calling it a land conversion “is obviously nonsense because dumping millions of cubic meters of sand into a permanently submerged area is, by any definition, reclamation”. “Saying it is a land development because the area was once above water is like saying reclaimed land is ocean because the area was once under water”, he adds.

San Miguel told Global Witness that the area where the project is located was previously commercially utilised as fishponds and therefore denied that the airport constitutes a reclamation project. The company added that it has tried to establish corrective measures that will mitigate or offset the project's environmental impacts.

## **Coercive Consultations**

This selective interpretation of land classification appears to be part of a broader pattern of procedural concerns. Mott MacDonald, the company responsible for writing an impact assessment that showcases how the project will meet international financing standards, writes that consultations with affected communities should occur early, be “free of manipulation”, and provide “transparent access to project information”, in line with established international standards. This investigation reveals an inadequate and coercive process.

In 2023, Global Witness [highlighted](#) community reports stating that 700 families would be displaced by the airport project. The Mott MacDonald project assessment only identifies 364 affected families, of which 277 are deemed eligible for compensation.

This suggests that the project has failed to account for and compensate over half of affected families and could have already displaced nearly 3,000 people.

San Miguel says it partnered with local government units and used its most recent local census to identify people affected by the project. The company says it identified 359 households displaced by the project and gave cash compensation to 353 of these families.

A resident of Bulakan shares her story alongside community and family members on the day of her 66th birthday. Her light, effortless demeanour shifts as her family and neighbours recount their displacement.

“The military visited our homes almost every day”, remembers Raquel Lopez, one of the younger community members. “People were getting scared since they were armed [...] Who wouldn’t be scared?”. She explains that military personnel would accompany the engineers representing San Miguel, who would come to question them and appraise the property.

The fear of military personnel in the Philippines are well-founded. In 2023, more people were [killed in the Philippines](#) for protecting the environment than anywhere else in Asia, and police or armed forces were implicated in half of the killings linked to land rights, according to Global Witness.

Jonila Castro and Jhed Tamano, two young environmental activists, had been organising with coastal communities to oppose the reclamation activities in Manila Bay when they were [taken by armed men](#) in September 2023. When the women re-surfaced seventeen days later at a government-organized press conference, they revealed that they had been abducted and denounced suspected military involvement in the incident. They are currently [being charged](#) with oral defamation.

Residents affected by the airport claim that soldiers pressured them to agree with the project or lose any offers of compensation. These reports echo other [recent accounts](#) of community coercion and land seizures surrounding a San Miguel project in another part of the Philippines.

## No Choice

Residents interviewed by Global Witness reported that they were not given a choice about whether to leave their homes. Initially, San Miguel representatives offered residents a choice between relocation (house and lot) or financial compensation. All of the affected community members that Global Witness spoke with expressed a preference for relocation. This is reflected in the Mott MacDonald impact assessment, which states that a majority of proponents favoured that option.

***“If you don't demolish it, you won't get paid. So you demolish your own house. They are pretty smart because demolishing is prohibited”***

– Rosanna Libao, displaced Bulacan resident

Residents say they later felt pressured into accepting inadequate compensation and told that they had no other option. The families that Global Witness interviewed received the equivalent of US\$ 4,290, an amount insufficient to cover a new house and land.



Protest against Manila Bay reclamation projects, Basilio Sepe.

Families say they were required to demolish their own homes and provide photographic evidence of the destruction to qualify for the payments.

“If you don't demolish it, you won't get paid. So you demolish your own house. They are pretty smart because demolishing is prohibited”, claims Rosanna Libao.

Rappler, an established investigative news outlet, adds that residents signed a [legal document agreeing](#) not to join any group or activity defying the company or project, not to ask for additional compensation, and to continually support the airport venture. Rappler adds that many of the residents cannot read or write, suggesting they were coerced into signing agreements they did not fully understand.

San Miguel promised they would provide jobs to affected communities, but residents explain that they have only received inconsistent and unreliable work, and that they were often paid late. San Miguel has also provided in-kind support, such as food or bicycles, which community members welcome with mixed feelings.

Rowena Tallar was unmoved by the grocery items that San Miguel delivered: “This was meant to improve their image by showing that they were still giving some aid to relocatees. It's like we're sponsoring their own products with our own money and they are earning from it. If they had just given us our money, we would have made better use of it”, she claims.

Displacement is unlikely to remain limited to these areas. The airport site itself will be surrounded by multiple parallel projects that could displace more people. Bong Laderas, a local activist, is worried about Hagonoy, where San Miguel plans to build the NALEX Highway as part of the airport site. He claims that the company's personnel recently distributed letters stating that the project site would overlap with their lots and houses. He is also worried about plans to build large arterial roads connecting Malolos, Hagonoy, and Calumpit to the airport.

San Miguel states that the compensation provided aligns with the country's regulations and international financing standards. The company denies any harassment or intimidation by the military and claims that the local government requested its presence to ensure peace and order in the community.

Contrary to what the residents shared with Global Witness, San Miguel claims the residents voluntarily demolished their own houses so they could preserve and salvage materials for a new home. The company adds that the provisions in the agreement are not contrary to "law, morals or public policy". They state that residents could understand the documents written in vernacular Tagalog, and that both family members and resettlement teams helped explain the waivers.

San Miguel also states that any property acquisition for the Nalex Highway will go through the standard government process, and that it has the right to acquire properties when convenient or essential to efficiently carry out the international airport's objectives, as set out in Republic Act No. 11506.

## Unfinished Business

Amid the environmental damage and coercive consultations, a new issue has emerged: Boskalis left the NMIA dredging site prematurely, according to government officials and community members. Several sources stated that the company ran out of sand, raising questions about the accuracy of its initial projections and suggesting that the allocated sand area is completely depleted. The airport construction is [now being delayed](#), and San Miguel confirmed it only obtained 80% of the sand required to complete the project from the original site.

Joseph Literal, Assistant General Manager for Philippines Reclamation Authority (PRA), stated that a company had asked the PRA for more sand to complete the airport, but that the President's order to suspend reclamation projects meant that they could not issue new permits for sand extraction sites elsewhere.

The Dutch government is insuring Boskalis' operations through Atradius DSB (Atradius), an export credit insurance agency that uses public money to protect businesses from the financial risks of operating abroad. Bert Bruning, Managing Director Atradius DSB, [stated](#) that the project meets international social and environmental standards.

Dr. Murtah Shannon comes to a different conclusion. "The fact that the Dutch state is providing insurance for the airport raises serious ethical questions", he states. "The Netherlands has a

reputation for environmental leadership, yet it is backing a project that has displaced hundreds of families and destroyed a fragile ecosystem”.

The initial environmental impact assessment (EIA) allowed the project to proceed despite not meeting international standards. Mott MacDonald carried out a subsequent assessment for San Miguel to help the company meet international financing requirements. Lenders for the project include international banks, such as ING, HSBC and Standard Chartered, in addition to the insurance from Atradius.

The Dutch export credit agency, Atradius, categorises this as a “Category A” project, defined as having potential “significant adverse environmental and/or social impacts, which are diverse, irreversible and/or unprecedented”. Over the past twelve years, Atradius [has funneled €8.4 billion](#) into two Dutch dredging giants despite mounting evidence of adverse impacts.

**In San Miguel’s stockholders’ meeting on June 14, 2022, the company’s CEO stated that :**

**“[...] a very important milestone on this airport is that the Dutch Government supports our project by issuing a guarantee to the contractor. And you know, the Dutch government does not grant such guarantee without investigating the environment, the ecosystems and the people around the area. They will never finance any project that may affect any local community”.**

## **Sinking Future**

The NMIA is more than just an infrastructure project. It is a symbol of unchecked development, built on unstable ground, at the expense of local communities and critical ecosystems. The environmental destruction, coercive displacement, and inadequate assessments surrounding the project paint a troubling picture of a development agenda that prioritises profit over people.

A Philippine government official agreed to share his personal views on the matter if we didn’t publish his name. Veering off-script at the end of the meeting, he stated: “we’re going to say that this is good for economics. That it’s good for people to have a job. But the long-term effect will be suffered by many, many people... Maybe the win-win solution here is for us to be able to stand on this land for a long time. Not just now, not just in 40 years, but for a longer time”.

Boskalis and Mott MacDonald did not reply to Global Witness’ request for comment.

## Recommendations

### For European Union Legislators

#### **Protect the Corporate Sustainability Due Diligence Directive's (CSDDD) Core Objectives:**

- > Ensure the European Union (EU) preserves the law's original commitments to robust human rights and environmental due diligence and the requirement to implement climate transition plans.
- > Do not introduce language or amendments that weaken corporate accountability or the Directive's enforceability.

**Maintain Timely Implementation:** Reject attempts to roll back the CSDDD's full implementation. Any postponements or adjustments undermine the EU's leadership on sustainability and perpetuate harmful practices in global value chains.

#### **Enhance Transparency and Enforcement:**

- > Ensure that any "streamlining" measures under the omnibus-a legislative package seeking to amend multiple EU laws simultaneously-do not compromise the CSDDD's reporting or due diligence requirements for companies. Transparency and predictability are essential for civil society, investors, and regulators to monitor compliance.
- > Enhance support for enforcement mechanisms, ensuring EU member states have sufficient resources and expertise to hold companies accountable for violations.

### For the Dutch Government

#### **Strengthen Accountability for Export Credit Practices:**

- > Commission an independent, publicly available review of the due diligence and impact assessments conducted by Atradius Dutch State Business (Atradius DSB) for the New Manila International Airport (NMIA) project. This review should actively include local communities and civil society groups, assess whether ADSB adequately followed international standards, and if necessary, ensure these obligations are met retroactively.
- > Ensure that Royal Boskalis Westminster N.V. and San Miguel Corporation provide fair and timely compensation to communities affected by the project, addressing both immediate and long-term impacts for the airport land development and all supporting facilities, including dredging operations.

**Embed Sustainability in Export Credit Policies:** Introduce stringent social and environmental conditions into future Export Credit Insurance agreements, ensuring effective monitoring, accountability and public disclosure of due diligence documentation for companies under these contracts.



**Advance Legislative Leadership:** Urgently implement the proposed Dutch international due diligence law (IMVO-wet) and advocate for a robust Corporate Sustainability Due Diligence Directive (CSDDD) at the EU level

## For the Government of the Philippines

**Investigate and Address Rights Violations:** Conduct an independent inquiry into the environmental and human rights abuses linked to the NMIA project, mobilising relevant agencies and ensuring a participatory process with local civil society organizations and affected communities. Ensure that where applicable, relevant actors, including companies, government officials, and agencies, are held accountable for any human rights violations.

**Assess Reclamation Projects:** Publish a comprehensive social and environmental impact assessment of all reclamation and land development projects in Manila Bay, including the NMIA, with a focus on their cumulative effects. Engage in consultations with local communities and civil society organizations to present the assessment results, verify their accuracy, and ensure that any necessary changes are appropriately addressed.

### Reform Policies to Safeguard Rights and Ecosystems:

- > Impose a moratorium of the approval and ongoing reclamation projects until a comprehensive assessment of their impacts are conducted and verified, mitigation measures are established, and accountability is achieved for human rights violations.
- > Enact reforms to ensure robust human rights and environmental protections in future development projects.
- > End state-led practices, such as “red-tagging” (i.e. labelling individuals or organizations as communist sympathizers or terrorists without evidence), harassment, threats, intimidation, judicial harassment, and enforced disappearances, among others, that target environmental and human rights advocates.
- > Prevent the militarization of communities with proposed or ongoing reclamation projects.
- > Reinforce the Philippines Development Plan’s commitment to sustainable development and ecological protection.

## For Key Companies

San Miguel Corporation, Atradius Dutch State Business, and Royal Boskalis should:

**Provide Remedy and Redress for Harm:** Offer meaningful redress, including financial compensation, to all communities directly and indirectly affected by the NMIA project. Ensure restoration of damaged ecosystems without resorting to superficial solutions.

**Assess and address environmental damage:** Adequately restore areas affected by the project development, using appropriate means.

**Strengthen Human Rights Due Diligence:** Prioritise investment in human rights due diligence to bring business practices in line with international human rights standards.

**Enhance Operational Transparency and Accessibility:**

- > Publicly disclose social, environmental and human rights documentation to meet international standards for demonstrating the adequacy of mitigation measures.
- > Increase transparency across business operations by publicly reporting complaints and responses to them as well as the results of remediation efforts.
- > Provide timely access to information for affected communities in accessible languages and forms.