



CAO ASSESSMENT REPORT

**Regarding Concerns in Relation to
IFC's Investment in Rizal Commercial Banking Corporation (RCBC) – 01
(#30235, #32853, #34115, #37489) in the Philippines**

April 2019

Office of the Compliance Advisor Ombudsman
for
the International Finance Corporation and the
Multilateral Investment Guarantee Agency
www.cao-ombudsman.org

About CAO

The Office of the Compliance Advisor Ombudsman (CAO) is the independent accountability mechanism for the International Finance Corporation (IFC) and the Multilateral Investment Guarantee Agency (MIGA), the private sector arms of the World Bank Group. CAO reports directly to the President of the World Bank Group, and its mandate is to assist in addressing complaints from people affected by IFC/MIGA-supported projects in a manner that is fair, objective, and constructive, and to enhance the social and environmental outcomes of those projects.

For more information, see www.cao-ombudsman.org

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LIST OF ACRONYMS

ASEAN	Association of Southeast Asian Nations
BIC	Bank Information Center
CAO	Office of the Compliance Advisor Ombudsman
FPIC	Free, Prior and Informed Consent
IFC	International Finance Corporation
IDI	Inclusive Development International
LNG	Liquified Natural Gas
MIGA	Multilateral Investment Guarantee Agency
NGO	Non-Governmental Organization
PMCJ	Philippine Movement for Climate Justice
RCBC	Rizal Commercial Banking Corporation
SEMS	Social and Environment Management System

1. OVERVIEW

In October 2017, a complaint was lodged with CAO by national NGO Philippine Movement for Climate Justice (PMCJ), on its own behalf as an alliance of organizations of concerned citizens of the Philippines fighting climate change. The complaint, which was supported by two international NGOs, was also filed on behalf of several communities living in the proximity of 19 active or proposed coal-fired power plants in different parts of the Philippines. The complaint alleges that Rizal Commercial Banking Corporation (RCBC), a client of IFC, provided financial support to the plants and cites serious environmental and social impacts on the communities arising from the plants.

CAO found the complaint eligible in relation to 8 of the 19 communities impacted by power plants in November 2017 and found financial exposure to a further 3 plants in March 2018, bringing the total number of impacted communities whose complaint is eligible to 11¹. CAO found the remaining 8 plants did not meet the eligibility criteria, not considering the link of IFC to these sub-projects sufficient exposure. A full list of the power plant projects and relevant decisions are included in Annex B.

During CAO's assessment, community representatives impacted by 2 of the 11 eligible plants expressed interest in dispute resolution with the relevant power plant operators: Sarangani Energy Corporation (operating the Southern Mindanao Coal Fired Power Plant) and Toledo Power Corporation. RCBC expressed a willingness to listen to impacted community representatives and forward insights gained to its clients with operations in the relevant community. It noted, however, that, as a funding entity rather than project operator, it did not consider itself in a position to engage in dispute resolution with the complainants but would facilitate access to the project operators of the power plants where an interest in dispute resolution exists.

Following introduction by RCBC, CAO met with the two project operators where the local community has expressed an interest in dispute resolution to ascertain whether they wish to engage in dialogue. Sarangani Energy Corporation decided against engaging in a voluntary CAO convened dispute resolution process, stating their belief in the importance of long-term engagement and partnership with their host communities, but that they prefer to use their existing community engagement process to address any concerns. After prolonged efforts by RCBC to facilitate an introduction, Toledo Power agreed to meet with CAO on 26 February 2019. During the meeting, it was agreed that the company would get back to CAO with an indication whether they would like to explore dispute resolution through CAO within two weeks. By end of March, CAO has not received Toledo Power's decision whether to engage in a CAO-convened dispute resolution. Should Toledo Power seek to explore engaging in dispute resolution, then CAO will handle this as a separate process.

Since the parties did not agree to pursue a voluntary CAO Dispute Resolution process in the case of the remaining 10 communities, the complaint will now be referred to CAO's Compliance function for appraisal of IFC's performance, as per CAO's Operational Guidelines.

Given the complexity and scope of this complaint, CAO's assessment took longer than the standard 120 days for CAO to cover all 11 eligible sub-projects in the same assessment process. The process was further extended for additional assessment meetings in October

¹ See Annex A: CAO Complaint Handling Process

2018 with a community that was unable to attend previous meetings due to security concerns, and February 2019 with Toledo Power.

2. BACKGROUND

2.1 The Project

IFC has four active investments in Rizal Commercial Banking Corporation (RCBC) (“the Company”) consisting of two equity investments (projects #30235 and #32853 invested in 2011 and 2013, up to \$49 million and \$100 million, respectively), one loan (project #34115, invested in 2014, \$30 million), and one bond (project #37489, invested in 2015, up to \$75 million). According to IFC disclosures, RCBC is one of the largest universal banks in the Philippines, providing a wide range of banking and other financial products and services, including commercial and retail banking, credit cards, asset management, and treasury and investment banking products and services. IFC’s investments aim at supporting RCBC’s growth in the areas of micro-finance, small and medium-sized enterprises, and retail banking, as part of IFC’s strategy to support the Philippine financial markets through investments in local financial institutions that play a key role in providing access to finance to underserved sectors.

2.2 The Complaint

In October 2017, a national NGO, the Philippine Movement for Climate Justice (PMCJ) submitted a complaint to CAO on behalf of several communities living in the proximity of 19 active or proposed coal-fired power plants located in different parts of the Philippines, and on their own behalf as an alliance of organizations of concerned citizens of the Philippines fighting climate change. Two international NGOs, Inclusive Development International (IDI) and Bank Information Center Europe (BIC Europe), also supported the complaint.

The complaint alleges that RCBC, a client of IFC, has provided financial support to the plants and raises several environmental and social concerns related to the development and operation of the plants, including impacts on biodiversity, health impacts caused by air pollution, inadequate compensation for physical displacement, loss of livelihoods, and violation of Indigenous Peoples’ rights. Further, the complaint raises broader issues about climate change impacts on the Philippines and its residents, including the complaint signatories, as well as issues related to RCBC’s environmental and social risk management system, lack of consultation and information about the projects and their impacts, and absence of grievance mechanisms for the affected communities.

The complaint also raises issues about IFC, namely a lack of transparency regarding IFC’s financial intermediary portfolio; IFC’s monitoring and supervision of RCBC’s environmental and social performance, especially given its investments in “business activities with potential significant adverse environmental and social risks or impacts that are diverse, irreversible, and unprecedented,” like in the coal sector; and compliance with its own policies and procedures in relation to its investment in RCBC.

The complaint further sets out a number of outcomes that the complainants seek. The full complaint can be accessed on CAO’s website at www.cao-ombudsman.org.

In November 2017, CAO found the complaint eligible in relation to 8 of the 19 power plants and commenced an assessment of the issues. In March 2018, CAO found a further 3 plants eligible and included those communities in its assessment. This brought the total eligible plants

to 11. CAO found the remaining 8 plants ineligible. CAO informed the complainants in writing about the ineligibility determination in relation to the 8 plants.

The issues raised during the assessment are described in more detail below.

3. ASSESSMENT SUMMARY

3.1 Methodology

The aim of the CAO assessment is to clarify the issues and concerns raised by the Complainants, gather information on the views of different stakeholders, and determine whether the Complainants and the IFC Project Sponsor would like to pursue a dispute resolution process facilitated by CAO, or whether the complaint should be handled by CAO's Compliance function for appraisal of IFC's performance (see Annex A for CAO's complaint-handling process).

While CAO, as per its Operational Guidelines, is not a legal enforcement mechanism or a substitute for court systems in host countries, CAO can address the issues and concerns as expressed in the complaint and offer its processes to the affected parties.

In this case, CAO's assessment of the complaint included:

- a desk review of project documentation;
- telephone conversations and in-person meetings with the Complainants and the NGOs supporting them, including during three assessment trips in March, May and October 2018;
- telephone conversations and in-person meetings with RCBC, including during two assessment trips in March and May 2018;
- telephone conversations and meetings with IFC's project team and World Bank Group Country Management in the Philippines;
- in-person meetings with RCBC's 2 clients where the host community had expressed an interest in dispute resolution, following introduction by RCBC.

This document presents a summary of the views heard by the CAO team, and explanations of next steps based on the parties' choice. This report does not make any judgment on the merits of the complaint.

3.2 Summary of views

Complainants' perspective

Community representatives raised a series of concerns about the environmental and social impacts of the coal-fired power plants in question. Not all impacts were reported to be simultaneously present in all locations, but there was significant repetition from site to site. These are summarized below:

- Impacts on public health: The Complainants raised concerns about impacts on respiratory health, such as an increase in asthma, especially among children. They said people are suffering from skin and throat irritation, and stomach upsets. Medical

missions, when available, are limited and not related to treating direct health impacts of coal projects, such as carrying out circumcisions or dental work.

- Adverse impacts from fly ash: The Complainants cited concerns about impacts from fly ash on water quality, settlement of fly ash on fruits and vegetables, such as mangoes, leading to reduced fruit production of local trees or stunted crop growth, skin rashes, and itching and rashes after wearing clothes dried outside. With practically nothing to harvest in the fields and to avoid fly ash, people are forced to go uphill to the mountains for food. They said animals are also impacted, citing mouth sores after eating grass covered by fly ash, even death, following skin rashes. There were also reports of coal stock piles and ash ponds being uncovered.
- Water, Air, and Noise pollution: The Complainants raised concerns about the decrease in water quantity and quality. Community members need water pumps to get water that was previously available using wells that are now dry. They said pumped water has a strong odor and is contaminated with rust, sand, worms and insects, therefore people are buying costly bottled water for consumption. They also cited “sticky water”, oil and gas in the water, and lead and heavy metals in the water. Because power plants use up a lot of water, farmers report that less water is now available for irrigation. Other issues included air pollution from smoke released at night, which is especially visible when smoke mixes with rain. Lichens, which are a known indicator of good air quality, have disappeared, and acid rain is resulting in galvanized roofs with significantly shorter life spans of about six months, compared with some five years prior.
- Impacts on fishermen: Fishermen are experiencing a decrease in fish catch near the plants, forcing them to go fishing much farther offshore, necessitating larger boats and more fuel. There are concerns around warm water outflow, as well as chemicals used in the desalination process at the plants, which local residents suspect is being dumped into the sea in outflow channels off the coast. Young fishermen are now shifting from fishing to becoming cargo carriers or mango harvesters in areas that are much further away in order to support their education. Access to fishing areas where power plants have private security or guard dogs further restricts fishing in the area. Docking areas for fishermen have decreased. Seashells, previously abundant, are no longer allowed to be consumed, seaweeds, local clams, and coral reefs are damaged.
- Inadequate resettlement: The Complainants cited relocation of families to inadequate and unfinished resettlement sites, with inadequate livelihood restoration for former farmers and fishermen that now need to make a living without access to land or water. Some compensation was never paid and some requests to project operators for compensation were met with intimidation. They also cited instances of demolition without relocation and compensation. Some people who do not recall being offered any resettlement felt forced to relocate by the situation and have quietly resettled in the mountains or very near the sea coast. Some relocation sites are very near the plant, and people report unbearable impacts from the plants which have led almost all resettled families to leave again and move to different towns. Other issues related to rights recognition of informal settlers in areas where most citizens don't hold title to their homes and properties, and concerns about leaving behind lands regarded as ancestral.
- Cumulative impacts: Since some plants are very close together in the same province, the Complainants cite concerns about cumulative impacts on the environment and people's health.
- Workers' concerns: Workers fear shortened life spans from working in the plant. Some have reported deductions taken from pay, but no contributions made to social security,

and reports of delay in payment of wages. Workers do not raise these concerns to management for fear of losing their jobs. They cited instances of workers being hired for three months only, and immediately replaced for no reason and no longer re-hired, therefore forcing them to go back to fishing. They also cited instances of workers being migrants from other places, and community members only offered construction, janitorial, and other menial jobs at the plants.

- A legacy of adverse impacts: The Complainants say that communities have experienced highly polluting and unaccountable power plants in their own or in neighboring towns, leading people to expect that new plants will lead to similar impacts and be similarly unresponsive to citizen's concerns. Further, community members speak of a legacy of unkept promises by existing plants regarding community benefits. Now that new projects are being proposed, the communities fear that a lot of promises will not be kept.
- Flawed consultation processes: The Complainants have the impression that decisions in favor of several of the projects were taken long before the consultation processes started. Then, they believe faulty consultations were carried out to support existing plans, such as organizers of the consultations consciously excluding critics of the plant; focusing the consultation process on anticipated benefits rather than transparency and public discussion about anticipated environmental and social impacts, and proposed mitigation measures; and community members being asked to sign blank sheets to indicate desire to be given work that actually meant giving consent to the project. The Complainants said Indigenous people did not give their required Free, Prior and Informed Consent (FPIC) to at least one project. In more than one case, community members reported a change in the power plant from Liquefied Natural Gas (LNG) to coal-fired power after consultations took place without informing the public of this change.
- Concerns about government-run processes: The Complainants said there is a lack of due process. They said local government units running processes where people are asked to sign papers selling land without seeing the price of the sale. Community members' efforts at seeking dialogue are met with indifference or threats by government representatives. They said there are reports of government representatives employing tactics like harassment, threats, taking of photos, retaliation against critics, and even imprisonment for unrelated offenses.
- A history of repression of concerns and opposition to projects: There were consistent reports from the Complainants about community members being afraid to raise concerns for fear of reprisals. People talk about a history of protests being met with police force and harassment, project opponents being targeted by local authorities, wrongly accused of crimes, such as illegal possession of firearms (framed or evidence planted) and prosecuted in court. In the most serious case, a known opponent of the project was shot and killed. The person had been elected president of the village organization opposing the plant. While it has not been established who committed the crime, the surrounding community has taken the message to be clear that raising concerns against the project means risking your life. In another case, the project hired a known former member of the military as their community liaison staff, who is known to threaten people. In another case, the presence of one family dominating local politics and economy with strong influence at all levels of governance, creates serious security concerns, fear and distrust among villagers, silencing opposition to the project, and leaving a sense of helplessness in the face of their power.
- Carbon emissions: Community members raised fears that the projects will jointly result in worsened global climate change impacts, to which the Philippines is particularly

vulnerable. Community members also expressed concerns about the impact of coal on their children and future generations of their families. Community members further point out that at the time the complaint was filed, the Philippines was already a signatory to the Paris Agreement on Climate Change. The complainants note that RCBC's investments in renewable energy are countered by its sizeable investment in coal plants.

Complainants specifically requested that CAO raise two issues with IFC:

- Investment in Protected Areas: The complainants requested that IFC commit to not investing in areas under environmental protection.
 - In discussion with IFC staff, they pointed out that IFC's Performance Standard 6 clearly sets out how IFC clients are expected to protect and conserve biodiversity, including requirements that projects would need to meet in critical habitat.
- Incident around the delivery of the CAO complaint to IFC Manila: The complainants raised concerns about the way they were received by IFC's security when they attempted to deliver the complaint to IFC Manila in October 2017, namely that they were asked to leave the premises without being received by a staff member, and subsequently followed by security after they had left the premises.
 - CAO relayed the concern to IFC management in Manila. IFC notes that staff is always willing to receive guests with a prior appointment and following usual security protocols. The concern has been taken up with the internal Ombudsman of the World Bank Group, which is mandated to handle this type of issue.

Company's perspective

Relationship with IFC

RCBC explained that its relationship with IFC, with investments through equity, loan and bond vehicles, focuses primarily on providing access to finance to small and medium enterprises (SME) lending, supporting women entrepreneurs, and rural lending. RCBC has signed on to IFC requirements such as IFC's Exclusion List, which restricts lending to companies involved in tobacco, firearms, gaming, and alcohol, for example.

Environmental and Social Performance Management

In terms of social and environmental due diligence, RCBC notes that it has implemented a Social and Environment Management System (SEMS) that supports the due diligence and appropriate classification of its clients from a social and environmental perspective.

RCBC notes that in 2018 it successfully completed a project to enhance its SEMS with assistance from IFC specialists. According to RCBC, its SEMS primarily follows IFC's Performance Standards and industry best practices to screen and categorize all projects (portfolio and pipeline) and loan applications from a social and environmental standpoint.

RCBC stated that, since implementing the SEMS, it has engaged the services of a leading Environmental and Social Management consulting firm to assist with policy development and conduct site visits of projects. Progressively, RCBC has developed in-house capabilities to conduct social and environmental due diligence, employed an environmental specialist on a

full-time basis and structurally placed the oversight of its SEMS program under the Risk Management Group.

RCBC explained that projects classified by its SEMS as “high risk” or Environmental and Social Category A, require what RCBC calls “enhanced social and environmental due diligence”. Enhanced due diligence requires RCBC’s Social and Environment officer (who is independent of the first line origination role) to conduct a site visit; meet members of the host communities and local officials to assess the impact of the investment on the environment and communities. Findings from the due diligence visit are discussed with the client, issued to the first line originating departments and also reported to RCBC’s Board’s Risk Oversight Committee.

For all project finance deals (in addition to the enhanced due diligence reviews), RCBC stated that it requires an independent technical advisor to advise (for the entire duration of the loan) on non-financial and technical aspects of the project, including environmental and social performance.

Environmental and social performance of investments:

RCBC explained that it carefully chooses clients that are willing to implement the Performance Standards, evaluating the investee’s history with RCBC, company character, and environmental and social performance among other lending criteria.

RCBC said its Social and Environmental Management System is robust and complies with IFC Performance Standards. It has hired technical specialists, trained frontline staff and regularly conducts site visits to oversee the environmental and social performance of its clients.

It further stated that the Bank discusses its observations with clients, maintains a register of findings, issues due diligence reports and expects its clients to address the observations noted.

Relationship with the Projects Subject of the Complaint

RCBC explained that it has outstanding loans to 10 out of 19 projects named in the complaint. It stated that one power plant listed in the complaint has no outstanding balance; consequently, its social and environmental performance is not being monitored by RCBC at this time. RCBC also states that it does not have any relationship with 8 projects listed in the complaint.

RCBC clarified that their participation in the projects is through syndication rather than bilateral investments. These exposures range from 2% to 29% with a maximum tenor of up to 15 years.

Environmental and social performance of investments named in the complaint

Enhanced due diligence has been conducted and reports issued on 9 out of the 10 power plants. RCBC explained that enhanced due diligence on one remaining power plant will be completed by 31 March 2019. It stated that only one power plant listed in the complaint has resulted in observations that are classified as “high risk” from a social and environmental risk perspective. According to RCBC, these observations do not indicate an immediate threat to the environment, project staff or the communities.

Meeting the country’s energy needs:

With respect to energy lending, RCBC pointed out that it has been an active proponent in the Renewable Energy space and has provided substantial financing support to a number of landmark and operational renewable energy projects in the Philippines as well as in the Southeast Asian region. RCBC notes that its eligible Sustainable Portfolio is materially larger than its loans to coal fired power plants.

Further, RCBC notes that in early 2019, it raised Peso 15B (USD 290M) under its “Green Finance Framework” to fund its “Green” eligible portfolio. According to RCBC, the issuance is the first green bond from the Philippines issued under the ASEAN Green Bond Standards

2018, and also aligned with the International Capital Market Association's Green Bond Principles 2018. RCBC states that the issue was 3 times oversubscribed, reflecting market sentiment of RCBC's efforts towards sustainability.

RCBC noted that having experienced serious energy shortages in the past, government policy has been to prioritize ensuring that the energy sector is able to cover the base load, as well as peak energy needs. RCBC argued that it is impossible to cover those needs out of renewable energy alone, which is why the government policy included coal in its energy mix to meet the country's energy needs.

4. NEXT STEPS

During CAO's assessment, community representatives impacted by 9 of 11 plants preferred to see their concerns addressed through CAO's compliance process. Community representatives of 2 of the 11 eligible plants expressed an interest in dispute resolution with the relevant project operator. As the dispute resolution process is voluntary for all sides, mutual agreement must be reached with the relevant company before proceeding with such a process. One of these 2 project operators has decided against a CAO convened dispute resolution process. By end of March, CAO had not received a positive response from the other project operator regarding this option.

Following CAO's Operational Guidelines, the complaint will now be referred to CAO Compliance for appraisal of IFC's performance. Should the remaining project operator express interest in exploring a CAO-convened dispute resolution process, then CAO will work to address concerns related to this project through a separate process.

Annex A: CAO Complaint Handling Process

Once CAO declares a complaint eligible, an initial assessment is conducted by CAO Dispute Resolution specialists. The purpose of CAO's assessment is to: (1) clarify the issues and concerns raised by the complainant(s); (2) gather information on how other stakeholders see the situation; and (3) help stakeholders understand the recourse options available to them and determine whether they would like to pursue a collaborative solution through CAO's Dispute Resolution function, or whether the case should be reviewed by CAO's Compliance function.

As per CAO's Operational Guidelines,² the following steps are typically followed in response to a complaint that is received:

- Step 1: **Acknowledgement** of receipt of the complaint.
- Step 2: **Eligibility**: Determination of the complaint's eligibility for assessment under the mandate of the CAO (no more than 15 working days).
- Step 3: **CAO assessment**: Assessing the issues and providing support to stakeholders in understanding and determining whether they would like to pursue a consensual solution through a collaborative process convened by CAO's Dispute Resolution function, or whether the case should be handled by CAO's Compliance function to review IFC's/MIGA's environmental and social due diligence. The assessment time can take up to a maximum of 120 working days.
- Step 4: **Facilitating settlement**: If the parties choose to pursue a collaborative process, CAO's dispute-resolution function is initiated. The dispute-resolution process is typically based on or initiated by a Memorandum of Understanding and/or mutually agreed-upon ground rules between the parties. It may involve facilitation/mediation, joint fact finding, or other agreed resolution approaches leading to a settlement agreement or other mutually agreed and appropriate goals. The major objective of these types of problem-solving approaches will be to address the issues raised in the complaint, and any other significant issues relevant to the complaint that were identified during the assessment or the dispute-resolution process, in a way that is acceptable to the parties affected.³

OR

Compliance Appraisal/Investigation: If the parties opt for a Compliance process, CAO's Compliance function will initiate an appraisal of IFC's/MIGA's environmental and social due diligence of the project in question to determine whether a compliance investigation of IFC's/MIGA's performance related to the project is merited. The appraisal time can take up to a maximum of 45 working days. If an investigation is found to be merited, CAO Compliance will conduct an in-depth investigation into IFC's/MIGA's performance. An investigation report with any identified non-compliances will be made public, along with IFC's/MIGA's response.

- Step 5: **Monitoring and Follow-up**

² For more details on the role and work of CAO, please refer to the full Operational Guidelines: http://www.cao-ombudsman.org/documents/CAOOperationalGuidelines_2013.pdf

³ Where stakeholders are unable to resolve the issues through a collaborative process within an agreed time frame, CAO Dispute Resolution will first seek to assist the stakeholders in breaking through impasse(s). If this is not possible, the Dispute Resolution team will inform the stakeholders, including IFC/MIGA staff, the President and Board of the World Bank Group, and the public, that CAO Dispute Resolution has closed the complaint and transferred it to CAO Compliance for appraisal.

Step 6: Conclusion/Case Closure

Annex B: Sub-projects in the complaint

Sub-project name	CAO Eligibility Decision	Complainant interest in Dispute Resolution	Comment
Masinloc Power Plant Expansion Project	Eligible	Not interested	(Found eligible in November 2017)
GNPower Dinginin Power Station Expansion	Eligible	Not interested	(Found eligible in November 2017)
South Luzon Thermal Energy Corp.	Eligible	Not interested	(Found eligible in November 2017)
San Buenaventura Power Ltd. Co. Project	Eligible	Not interested	(Found eligible in November 2017)
Panay Power Station Expansion Project	Eligible	Not interested	(Found eligible in November 2017)
Southern Mindanao Coal Fired Power Plant	Eligible	Interested	(Found eligible in November 2017)
Lanao Kauswagan Power Plant	Eligible	Not interested	(Found eligible in November 2017)
Toledo Power Corp. Plant	Eligible	Interested	(Found eligible in November 2017)
Atimonan One Energy Power Plant	Eligible	Not interested	(Found eligible in March 2018)
Limay Power Plant	Eligible	Not interested	(Found eligible in March 2018)
Davao Greenfield Plant	Eligible	Not Interested	(Found eligible in March 2018)
Mariveles Power Generation Corp. Power Plant	Ineligible	N/A	(Found ineligible in March 2018)

Sub-project name	CAO Eligibility Decision	Complainant interest in Dispute Resolution	Comment
Redondo Peninsula Energy Subic Power Plant	Ineligible	N/A	(Found ineligible in March 2018)
Central Luzon Premiere Corporation Power Plant Project	Ineligible	N/A	(Found ineligible in March 2018)
SMC Global Power Coal Plant	Ineligible	N/A	(Found ineligible in March 2018)
Therma Visayas Energy Project	Ineligible	N/A	(Found ineligible in March 2018)
Pagbilao Coal-fired Thermal Power Plant	Ineligible	N/A	(Found ineligible in March 2018)
Merbau Coal-fired Thermal Plant	Ineligible	N/A	(Found ineligible in March 2018)
Global Luzon Power Plant	Ineligible	N/A	(Found ineligible in March 2018)