### **The 21st WEPA Annual Meeting**

September 8, 2025 in Putrajaya, Malaysia



# **Updates on Water Environment Governance** in Industrial Wastewater Management

### **PHILIPPINES**

#### **ENGR. MICHIEKO SUMIDA-SIBUNGA**

Officer in Charge – Water Quality Management Section Environmental Quality Management Division Environmental Management Bureau Department of Environment and Natural Resources

# 1.1 Regulatory framework for wastewater management

Philippine Clean Water Act of 2004 (RA 9275)

Implementing Agency: Department of Environment and Natural Resources (DENR) through the Environmental Management Bureau (EMB)

Key implementing instruments:

- DAO 2005-10: Implementing Rules and Regulations of RA 9275
- DAO 2016-08: Water Quality Guidelines and General Effluent Standards
- DAO 2021-19: Revised Guidelines on Compliance Monitoring
- DAO 2025-24: Guidelines for the designation of waterbodies as Non-Attainment and Attainment Areas



# 1.2 Basic regulations on industrial wastewater management

Sı	ıbject to regulation		
Types of industries	X All industries  Selected industries		
Applicable effluent volume	No limit, but DAO 2005-10 (Rule 14.5) outlines a tiered structure for annual permit fees based on the volume of effluent discharged per day.		
How are the standard values set?			
Possibilities of setting more stringent standards	∑ Yes □ No		
Transition periods, provisional standards, or other (to give industries time to adapt to emission standards)	Transition period (grace period as per DAO 2016-08)  Provisional standards  Other (specify:		
Relevant laws to regulate effluent qualities from industries	•Republic Act No. 9275 (Clean Water Act) •DENR Administrative Order (DAO) No. 2005-10 / DAO No. 2016-08 / DAO No. 2021-19 - WQG & General Effluent Standards		

Monitoring and inspection			
Monitoring method	Self (automated) X Gov. or 3 <sup>rd</sup> party		
Monitoring parameter(s)	DAO 2016-08 specifies that the "significant effluent quality parameters that industries must monitor."		
Frequency	Self-monitoring reports (SMRs) – quarterly submission		
Inspecting agency	Department of Environment and Natural Resources – Environmental Management Bureau (EMB) or Laguna Lake Development Authority (LLDA)		
Inspection	Traditional on-site inspection then if violations are identified, EMB can issue a Notice of Violation to the establishment.		
Reporting obligation	Yes through Self-Monitoring Report (SMR) system		
Reporting to (whom)	EMB or LLDA		
Number of regulated facilities	22,000 Valid Discharge Permit		
How to identify the facility number	Through wastewater discharge permit or DENR ID Number or Company Registration System (CRS)		



### 1.3 General Effluent Standards

Prescribed under **DENR Administrative Order (DAO) No. 2016-08, or the** "Water Quality Guidelines and General Effluent Standards of 2016."

These standards establish the maximum allowable concentrations of specific pollutants in wastewater that can be discharged to water bodies or land. They apply to all point sources of pollution, new or existing, regardless of industry category, unless industry-specific standards are provided.

Danamatan	Unit	Water Body Classification								
Parameter	Unit	AA	A	В	С	D	SA	SB	SC	SD
Ammonia as NH <sub>3</sub> -N	mg/L	NDA	2	3	4	9	NDA	3	4	9
BOD	mg/L	NDA	20	30	50	120	NDA	30	100	150
Boron	mg/L	NDA	4	4	4	12	NDA	4	25	100
Chloride	mg/L	NDA	350	350	450	500	NDA	n/a	n/a	n/a
COD	mg/L	NDA	60	60	100	200	NDA	60	200	300
Color	TCU	NDA	100	100	150	300	NDA	100	150	300
Cyanide as Free Cyanide	mg/L	NDA	0.14	0.14	0.2	0.2	NDA	0.04	0.2	0.4
Fluoride	mg/L	NDA	2	2	2	4	NDA	3	3	6
Nitrate as NO <sub>3</sub> -N	mg/L	NDA	14	14	14	30	NDA	20	20	30
pH (Range)		NDA	6.0-	6.0-	6.0-	5.5-	NDA	6.5-	6.0-	5.5-
	/=		9.0	9.0	9.4	9.5		9.0	9.0	9.5
<b>Phosphate</b>	mg/L	NDA	1	1.5	4	10	NDA	2	4	10
Selenium	mg/L	NDA	0.02	0.02	0.04	0.08	NDA	0.02	0.2	0.4
Sulfate	mg/L	NDA	500	500	550	1000	_	_	_	_
Surfactants (MBAS)	mg/L	NDA	2	3	15	30	NDA	3	15	30



## 1.3 General Effluent Standards (GES)

For Strong Wastewater

Applicable only if the establishment provides proof:

- Influent values for for 12 months are within Table 10 of DAO 2016-08
- Laboratory result must be from DENR Recognized Laboratory

Influent BOD (mg/L)	Unit	Class C	Class D	Class SC	Class SD
3,000 to <6,500	mg/L	100	150	100	150
6,500 to <10,000	mg/L	200	300	200	300
10,000 to 30,000	mg/L	600	1,000	600	1,000
>30,000	mg/L	900	1,500	900	1,500



### 1.4 Basis for the standards

GES Applies to all establishments **discharging wastewater** to receiving bodies of water or land.

Standards depend on the water body classification:

Class AA: Public Water Supply I Class SA: Protected Areas

Class A: Public Water Supply II Class SB: Recreational Waters

Class B: Recreational Waters Class SC: Fisheries

Class C: Agriculture

Class D: Navigational Waters

Class SD: Navigational Waters

Basis	Description
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Water Quality Guidelines

To preserve classification of receiving water

bodies

Toxicological Data Protection of human and ecological health

Stakeholder Input Consultations with affected sectors

Risk-Based Approach Adjusted per use/class of receiving water

#### OTHER CONSIDERATION

Technology-Based	Based on achievable treatment performance
International Benchmarks	Adapted from global practices esp ASEAN



# 1.5 Measures taken to improve the compliance by industries

- Securing a valid Wastewater Discharge Permit
- **Compliance** with Wastewater Discharge Permit Conditions and Applicable Effluent Standards
  - Note: should be based on effluent analysis through EMB-Recognized Laboratory
- Submission of Completely Fill-out Module 3 of the Self-Monitoring Report (SMR)



# WASTEWATER DISCHARGE PERMIT Sec 14 RA 9475/ Rule 14 of IRR

- A legal authorization granted to the owners or operators of facilities by the DENR to discharge wastewater;
- It shall specify among others the quantity and quality of effluent of the said facilities allowed to be discharged into a specific waterbody
- The annual fee is from Php 2,000- Php 3,900 depending on the volumetric rate of discharge and if with heavy metals
- · Validity: up to 5 years



Date: May 16, 2019

Permit No.: DP-R12-19-01194

#### WASTEWATER DISCHARGE PERMIT

Pursuant to Section 14, Article 2, of the RA 9275 otherwise known as the "Philippine Clean Water Act of 2004", this permit is hereby granted to **LGU-Alabel** with office address at Alabel Municipal Hall, C.P. Garcia Nat'l Secondary Road, Poblacion (Alabel), Alabel (Capital), Sarangani for its establishment:

Alabel Septage Treatment Facility

Sitio Mahayahay Bagacay ALABEL (Capital)

TIN No. 001-694-044-0000

- \* Reference for effluent parameters: DAO 2016-08; PSIC Code 3700?
- The permit holder shall not be allowed to discharge effluent to any receiving body of water or land.
- Shall submit Self-Monitoring (SMR) based on the following schedule:

Quarter	Coverage	Submission	Quarter	Coverage	Submission
First	Jan-Mar	1-15 Apr.	Third	Jul-Sep.	1-15 Oct.
Second	Apr-Jun.	1-15 Jul.	Fourth	Oct-Dec.	1-15 Jan.

- Shall have a regular Pollution Control Officer (PCO) duly accredited by the Office and comply with the requirements of DAO 2014-02.
- Shall allow the entry of our duly authorized representative(s) to conduct inspection within your premises.
- This permit, together with the corresponding Official Receipts of Payment, shall be adequately framed and posted in a conspicuous place at the plant/establishment.
- 6. This permit shall be renewed thirty (30) days prior to its expiration.

This permit is valid up to May 16, 2024, unless revoked or suspended by this Office in writing.

Non-compliance with the above conditions and/or any pertinent provisions of RA 9275 otherwise known as "Philippine Clea Water Act of 2004", a corresponding penalty in the amount of P10,000-P200,000 per violation shall be imposed.

Recommended by

Approved by

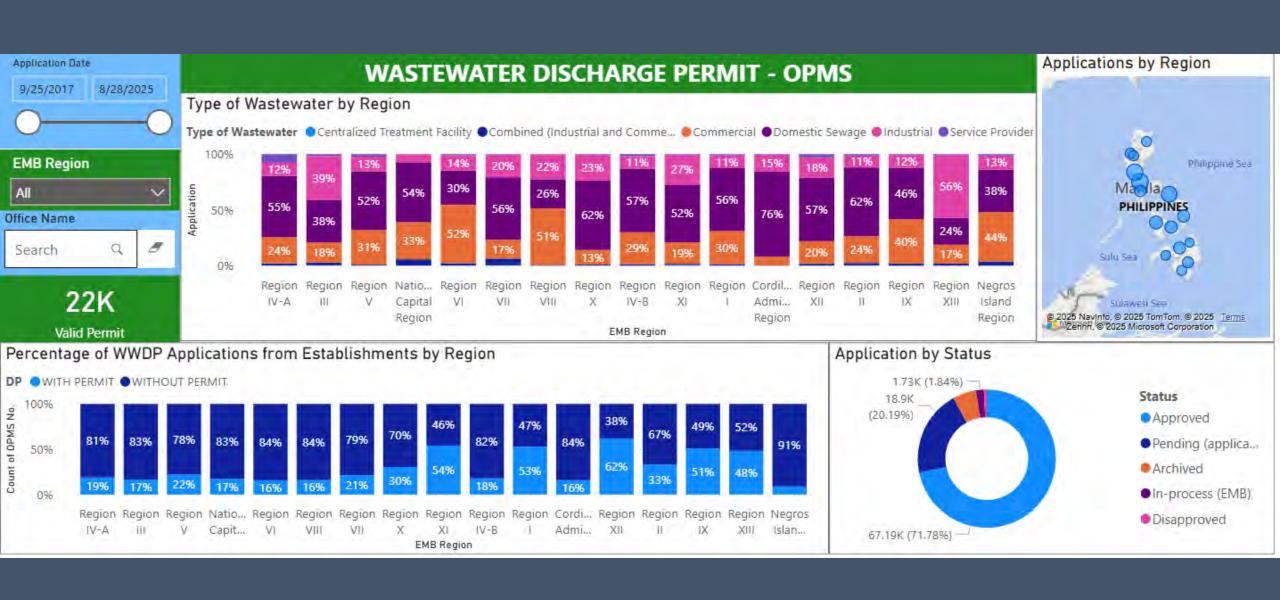




Filing Fee	: Php 55.00	O.R. No. :	2656862	Date :	Maich 1, 201
PD1856	: Php 10.00	O.R. No. :	2656862	Date :	March 1, 201
Documentary Sta	mp Tax : Php 30.00	O.R. No. :	2656862	Date :	March 1, 201
Permit Fee	: Php 10000.00	O.R. No. :	2653079	Date :	April 12, 2019



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# CLARIFICATION IN THE ISSUANCE OF DISCHARGE PERMIT FOR ESTABLISHMENTS/INDUSTRIES 19 Apr 2021 Memorandum

- •One (1) Discharge Permit will be issued per outfall/outlet
  - •Identify the SEQP
  - Quantity and quality of effluent
- •In unsewered areas:
  - Install a septic tank (DOH AO 2019-0047) or onsite STP
  - Must be regularly desludged by DOH-accredited desludger (DILG MC 2019-62)
  - Certificate of treatment for DP approval.
- •Commercial and industrial wastewater:
  - •Must be treated to meet the SEQP
- •Serviced by operational WTF:
  - •Must connect to the sewer line.
  - •Wastewater discharge must meet the criteria set by the operator of the accepting treatment facility.
  - Certificate of connection



Department of Environment and Natural Resources ENVIRONMENTAL MANAGEMENT BUREAU DEHR Campund, Vitayae Avanue, Dillman, Quason Dily 1118



#### MEMORANDUM

TO : ALL REGIONAL DIRECTORS

FROM : THE DIRECTOR

SUBJECT : CLARIFICATION IN THE ISSUANCE OF DISCHARGE PERMIT

FOR ESTABLISHMENTS/INDUSTRIES

DATE : 19 APRIL 2021

In line with the implementation of Discharge Permitting System under RA 9275, otherwise known as the Philippine Clean Water Act of 2004, the following are the clarifications in the issuance of discharge permit for multiple outfalls:

- One (1) Discharge Permit shall be issued per outfall/outlet to identify the Significant
  Effluent Quality Parameters (SEQP) per Philippine Standard Industrial Classification
  (PSIC) Code under the Water Quality Guidelines and General Effluent Standards.
- For unsewered areas, establishments/industries are required to install a septic tank or an onsite sewage treatment facility.
  - Establishments/industries generating domestic wastewater shall be regularly
    desludged by an accredited desludger of the Department of Health (DOH). A
    certificate of treatment or receipt from the desludger must be secured from the
    desludger for the approval of Discharge Permit.
  - Establishments/industries generating commercial and industrial wastewater shall be treated and shall conform with the general and significant effluent quality parameters per sector as listed in Table 8 of DENR DAO 2016-08.
- Establishments/industries located in areas serviced by an operational wastewater treatment facility shall be required to connect to the sewer line. Wastewater to be discharged into the sewer line must be treated in accordance with the criteria set by the operator of accepting wastewater treatment facility. A certificate of interconnection/connection shall be the conditional requirement in the issuance of a Discharge Demit

In addition, all EMB- Regional Offices shall be guided on the EMB Memorandum Circular 2020-006 on the Clarification in the Implementation of Rules 13.8 (Wastewater Charges in ECOZONE) and 14.18 (Pollution Sources connected to sewerage systems).

For your information and guidance.





# Certificate of Interconnection

Establishments/industries located in areas serviced by an operational wastewater treatment facility shall be required to connect to the sewer line. Wastewater to be discharged into the sewer line must be treated in accordance with the criteria set by the operator of the accepting wastewater treatment facility. A certificate of interconnection/connection shall be the conditional requirement in the issuance of a Discharge Permit.



#### **Certificate of Separate Sewer Coverage**

(Commercial/Industrial)

Manila Water Company, Inc. (MWCI), as the Concessionaire of Metropolitan Waterworks and Sewerage System (MWSS) for the East Zone of Metro Manila, issues this certificate to:

#### **EMB-NCR**

Address: National Ecology Compound, East Ave. Diliman ,Quezon City
CAN: 11201380
Date Issued: May 26, 2021

The above mentioned is inter-connected to the separate sewer system of MWCI conveyed to East Ave STP located at East Ave., East Triangle, Brgy. Central, Quezon City and is subject to random effluent sampling. Effluent characteristics shall always comply to the following limitations:

PARAMETER	VALUE
Biological Oxygen Demand (BOD)	500
Chemical Oxygen Demand (COD)	700
Total Suspended Solids (TSS)	200
Oil and Grease (O&G)	100

The above <u>CONDITIONS</u> are for strict compliance. Failure to do so shall be subject to revocation of this certificate.

This Certificate of Separate Sewer Coverage is valid up to 1 year only and shall be renewed within thirty (30) days before the date of expiration.

Prepared By

EDDINAND C CIRCIPOD

Sewer Collection System Manager Northwest Grid

Wastewater Operations Division

Approved By:

84646

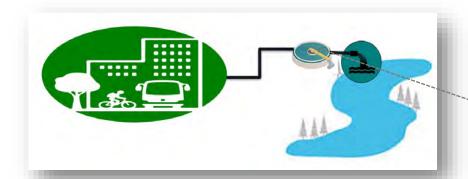
SHARON PARKER B. CERBITO Grid Facilities Head

Northwest Grid
Wastewater Operations Division

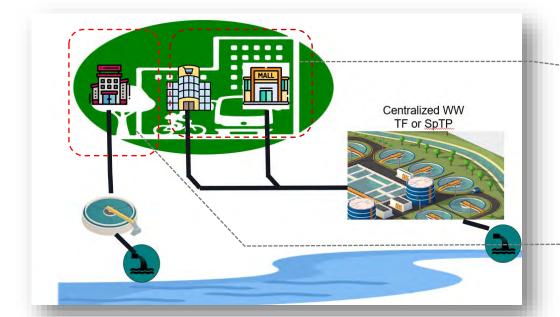
MANRA WATER COMPANY, INC.

MWSS Administration Building, 489 Katipunan Road, 1105 Balara, Quezon City, Philippines

# MC 2020-006: CLARIFICATION IN THE IMPLEMENTATION OF RULES I3.8 AND 14.18 OF DENR ADMINISTRATIVE ORDER NO. 2005-10



Business District
/ECOZONE:
DP FEE &
Wastewater
Charge



Connected
Locator:
DP FEE

DP FEE & Wastewater
Charge



### Republic of the Philippines Department of Environment and Natural Resources ENVIRONMENTAL MANAGEMENT BUREAU

DENR Compound, Visayas Avenue, Diliman, Quezon City 1116
Telephone Nos: 927-15-17, 928-20-96
Email, emb@emb.gov.ph

FEB 1 2 2070

#### MEMORANDUM CIRCULAR NO. 006

Series of 2020

SUBJECT

CLARIFICATION IN THE IMPLEMENTATION OF RULES 13.8 AND 14.18 OF DENR ADMINISTRATIVE ORDER NO. 2005-10

Pursuant to Republic Act No. 9275 also known as the Philippine Clean Water Act of 2004 and DENR Administrative Order (DAO) No. 2005-10 or the Implementing Rules and Regulations of RA 9275, the following are the provisions of Rules 13.8 (Wastewater Charges in ECOZONE) and 14.8 (Pollution Sources Connected to Sewerage Systems) of DAO 2005-10:

- The wastewater discharge fee shall be paid by the operator of the wastewater treatment plant (WTP) located within ECOZONES. Provided, that industries within ECOZONES that are not connected to the WTP shall be liable for the wastewater charges individually.
- Pollution sources currently discharging to existing sewerage systems with operational wastewater treatment facilities shall be exempt from the permit requirement. Provided that, in the absence of, or pending the establishment of a sewerage system, pollution sources shall be covered by the permit requirement.

As such, the following are the clarification in the implementation of Rules 13.8 and 14.8 of DAO 2005-10:

- Water service providers, Economic Zones (ECOZONES), Business Districts, Industrial Estates and similar business parks shall put up adequate WTP, secure a Discharge Permit (DP), and pay the corresponding wastewater discharge fee.
- Malls and buildings that are not connected to centralized WTP are similarly required to put up their WTP and secure DP.
- Locators and establishments that are not connected to existing WTP are required to secure Discharge Permit (DP) individually and shall be liable for its wastewater charges.
- Locators and establishments/stores that are connected to existing WTP of ECOZONES and malls/buildings, respectively are exempted from securing DP. However, a certificate of interconnection/connection must be issued by the operator of the said WTP and said certificate must be submitted to the concerned EMB Regional Office.

This Memorandum Circular shall take effect immediately.



ENGR. WILLIAM P. CUNADO

Protect the anvironment - Protect life

# 1.6 Compliance: Incentives and Penalties

	Incentive
Appeals to the public, such as awards and ranking	Philippine Environment Partnership Program (PEPP): For industries with superior environmental performance (beyond compliance) Rivers For Life Award (for PENRO/CENRO, LGUs and communities) Outstanding Water Quality Management Area Award (WQMAs) Recognition of Partners for Adopt an Estero Waterbody Program
Financial incentive	Only RIVERS for Life Award has prize money, but is not focused on industries. PEPP is focused on industries but only regulatory incentives are given. Adopt an Estero Waterbody Program may be for industry partners but no monetary award, only plaque of recognition
Institutional incentives such as preferential approval	PEPP: submission of Self Monitoring Report from 4 times a year to 2 times a year, extension of Validity of Permit
Others	

	Penalty
Imprisonment	Failure to clean-up contamination / pollution: 2 to 4 years imprisonment if refusal results in serious injury, death, or irreversible contamination: 6 to 12 years imprisonment
Fine	Violation to prohibited acts (Sec 27 of RA 9275) e.g. Non compliance to effluent standard is Php 25,937.42 to Php 518,748.49 per day of violation.  Failure to clean-up is <b>P50,000 to P100,000</b> per day  Death or irreversible contamination is Php 500,000 per day
Other	Cease and Desist Order

# Philippine Environment Partnership Program (PEPP) Rule 26 of RA 9275 IRR

- DAO 2003 -14 Creating the PEPP to support Industry Self-Regulation towards Improved Environmental Performance
- Design to give recognition and incentives to individual establishments that go beyond compliance and demonstrate superior environmental performance (Track 1 Category)
  - ✓ High-profile Recognition Reward
  - ✓ Regulatory Assistance
  - ✓ Fiscal Incentives



# Prohibited Acts (Sec 27 RA 9275)

Sec 27	Description
(a)	Discharging or depositing materials into water bodies that cause pollution or impede water flow.
(b)	Polluting groundwater by discharging or allowing substances to seep into the soil
(c)	Operating facilities discharging water pollutants without valid permits
(d)	Dumping infectious medical waste into seawater, unless in emergency situations
(e)	Unauthorized transport or dumping of sewage sludge or solid waste
(f) & (g)	Discharging prohibited chemicals or pollutants (RA 6969) into water bodies.
(h)	Operating wastewater facilities in violation of environmental regulations (PD 1586)
(i)	Noncompliance with discharge permit requirements
(j)	Local Government Unit (LGU) noncompliance with Water Quality Management Plan
(k), (l), & (m)	Refusal to allow Department inspections, access to reports, or designation of pollution control officers
(0)	Using booster pumps or tampering with water supply, impairing water quality.

# Fines, Damages, and Penalties (Sec 28 RA 9275)

- Fines of ₱10,000 to ₱200,000 per day of violation (increased by 10% every 2 years), and possible closure or suspension upon Pollution Adjudication Board (PAB) recommendation
- 2 to 4 years imprisonment and irreof violation for failure to clean up
- 6 to 12 years imprisonment and ₱500,000 per day of violation if refusal results in serious injury, death, or irreversible contamination



PAB Resolution 2021-05 Guidelines on the graduated schedule under the Philippine Clean Water Act and its Implementing Rules and Regulations

Table 1. Minimum and maximum amount of fines under R.A. 9275 subject to corresponding biennial adjustment of 10% starting from its year of effectivity.

Year	Minimum	Maximum
2004	10,000.00	200,000.00
2005	10,000.00	200,000.00
2006	11,000.00	220,000.00
2007	11,000.00	220,000.00
2008	12,100.00	242,000.00
2009	12,100.00	242,000.00
2010	13,310.00	266,200.00
2011	13,310.00	266,200.00
2012	14,641.00	292,820.00
2013	14,641.00	292,820.00
2014	16,105.10	322,102.00
2015	16,105.10	322,102.00
2016	17,715.61	354,312.20
2017	17,715.61	354,312.20
2018	19,487.17	389,743.42
2019	19,487.17	389,743.42
2020	21,435.89	428,717.76
2021	21,435.89	428,717.76
2022	23,579.48	471,589.54
2023	23,579.48	471,589.54
2024	25,937.42	518,748.49
2025	25,937.42	518,748.49
2026	28,531.17	570,623.34
2027	28,531.17	570,623.34
2028	31,384.28	627,685.68
2029	31,384.28	627,685.68
2030	34,522.71	690,454.24

## 1.7 Other relevant information on industrial wastewater management

DAO 2025-24: Guidelines for the designation of waterbodies as Non-Attainment Areas (NAA) and Attainment Areas (AAs) and Procedures for monitoring, restoration, revival, and rehabilitation of initially designated NAAs

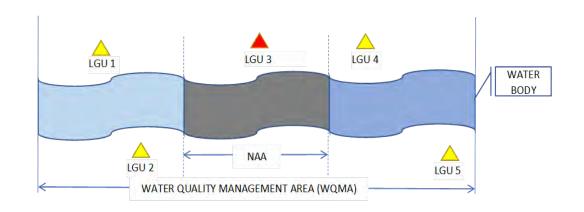
Designation of waterbodies (or a portion thereof)

- With exceedance to the water quality guidelines as Nonattainment Areas
- rehabilitated and conforms with the water quality guidelines as an Attainment Area

Basis for Designation of NAA

calculated annual concentration of specific pollutants (parameter of concern/ qualifying parameter) that has already exceeded water quality guidelines, for three (3) consecutive years

Waterbody profile, location, sources of pollution, other general information



Basis for Designation of AA

conformance to the WQG per calculated **annual concentration** of specific pollutants (parameter of concern/ qualifying parameter) for **one** (1) year



# Action PLANS

**WQMA Action Plan** 

**NAA Action Plan** 

**Contingency Plan** 



<u>To keep</u> water quality within the Water Quality Guidelines or Criteria conforming to the water body's classification



t covers the actions that will be undertaken for the next three (3) years to **return** the water quality of the designated NAA to its



A plan with <u>stricter</u> course of action that serves as a <u>backup plan</u> or "Plan B" if the waterbody have no signs of achieving the WQG before its third year of implementation.

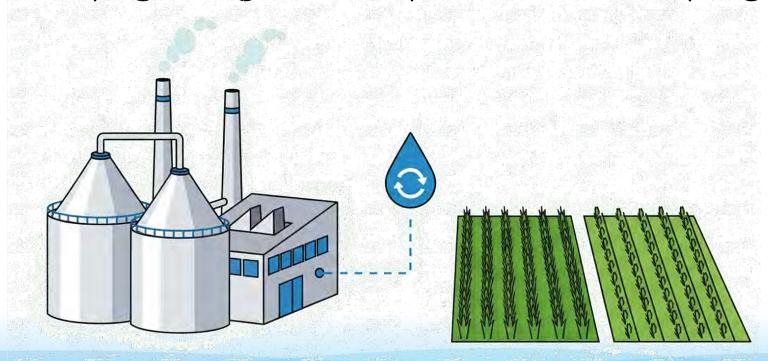
Non – Attainment Area

Formulation:
Pollution Reduction
Strategies i.e. upgrading of WTF,

Formulation:
Stricter Pollution Control
Measures i.e. Stricter
Effluent Standard,
mandatory installation of
advanced treatment
technologies, closure of
establishment

# 2. Case Study: Alcohol Distillery Wastewater Reuse in Agriculture (Philippines)

- Industry: Ethanol and alcohol manufacturing (distillery)
- Location: Batangas, Philippines
- Focus: Investigation of wastewater reuse as fertilizer under the guise of "pagdidilig" (free liquid fertilization program)





# 2.1 Selected Industry

- Distillery industry produces high-strength wastewater (influent BOD > 30,000 mg/L)
- Treatment system includes:
  - 9 HDPE-lined lagoons
  - Sequencing Batch Reactor (SBR)
  - Evaporator plant (rainy season use)
- Treated wastewater distributed to farmers as liquid fertilizer





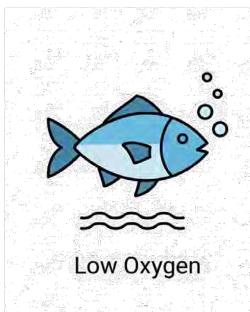
# 2.2 Background of the Case

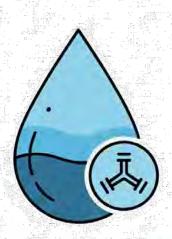
- Complaint received: alleged illegal discharge of strong wastewater under guise of "pagdidilig"
- Farmers claimed soil infertility and possible discharges to river
- EMB investigation:
- Site inspection of lagoons and drainage
- Sampling at influent, effluent, digester overflow
- Stakeholder consultations (LGU, barangay, farmers)
- **Concern:** Was the wastewater adequately treated and monitored before reuse?



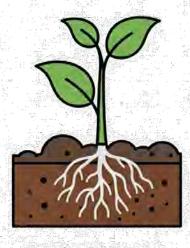
# 2.3 Impacts on the Water Environment

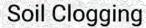
- Risks of strong wastewater:
  - Oxygen depletion in rivers → fish kills
  - Soil clogging and poor crop yield if untreated
  - Possible groundwater contamination
  - Storm channel observed with wastewater-like liquid
- Farmers reported soil infertility near lagoon area





Groundwater



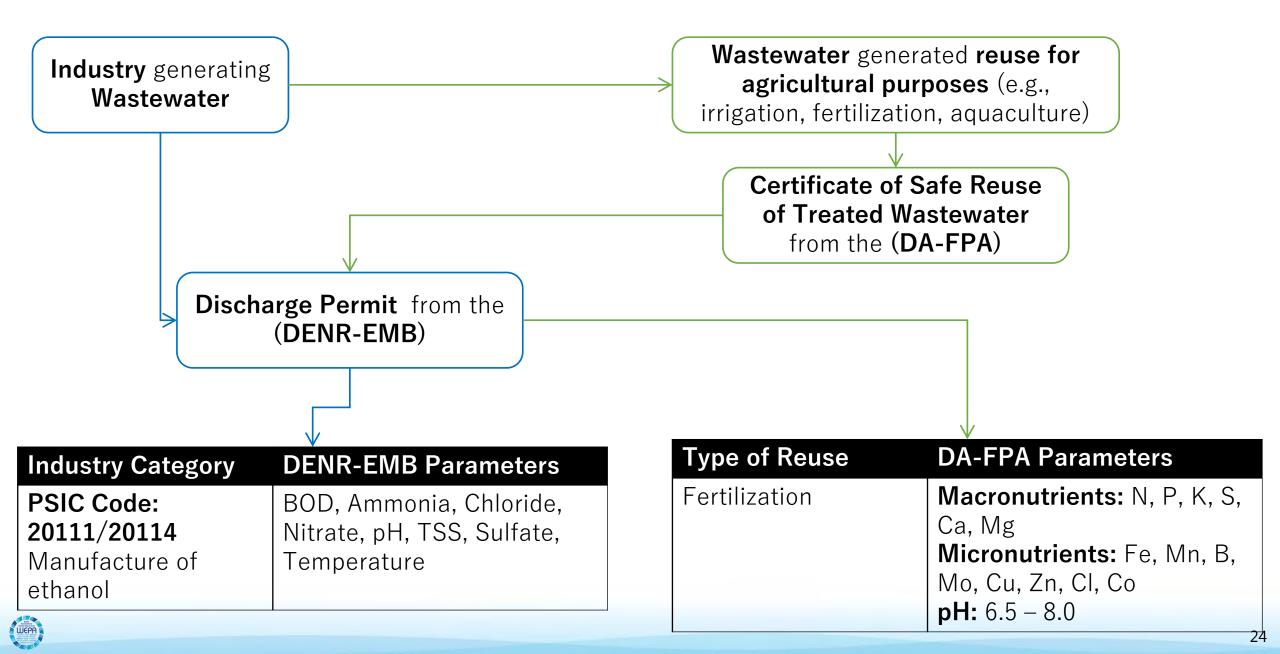




Poor Yield

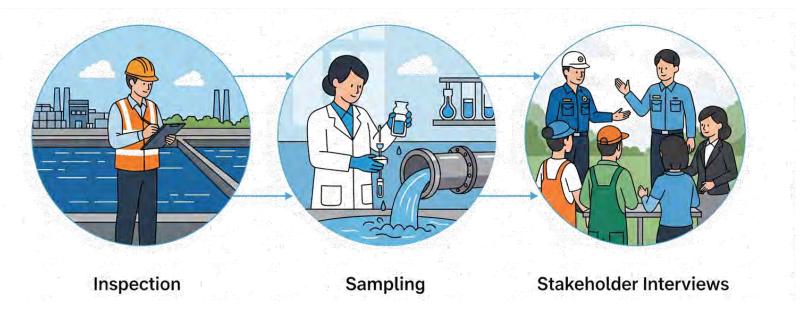


# 2.4 Regulatory Framework in the Philippines



# 2.5 The Investigation (Actions Taken to Ensure Compliance)

- Inspection conducted by EMB in response to complaints of illegal discharge
- Activities:
  - Site inspection of lagoons and drainage
  - Sampling at influent, digester overflow, effluent
  - Stakeholder interviews (LGU, barangay, farmers)

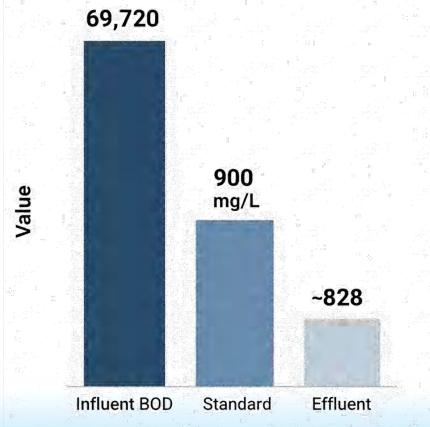


 Aim: Verify compliance with EMB effluent standards and adequacy of treatment before reuse



# 2.6 Findings

- **Influent BOD:** 69,720 mg/L → qualifies as "strong wastewater"
- **Effluent BOD:** <828 mg/L → passed adjusted strong ww limit (900 mg/L, DAO 2016-08)
- Ammonia and TSS: exceeded standards → treatment not fully adequate







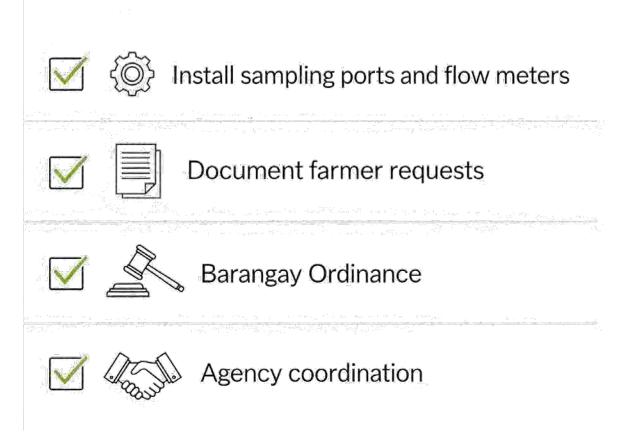
- Monitoring gaps:
  - No safe sampling ports
  - No flow meters
- Reuse gaps: Weak documentation, no barangay ordinance formalizing "pagdidilig"



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# 2.7 How the Case is Progressing

EMB recommended holding DP renewal until:



 Highlight: BOD and TSS should always be included in permits for wastewater reuse

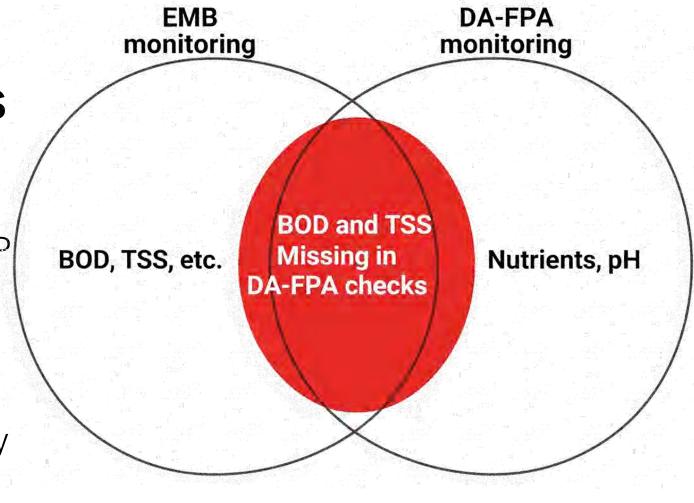


# 2.8 Other Relevant Information / Policy Gaps

 DA-FPA focuses on nutrients and soil pH, but does not require BOD/TSS testing

 EMB relies on DA-FPA certificate before issuing DP for reuse → but critical water quality parameters can be overlooked

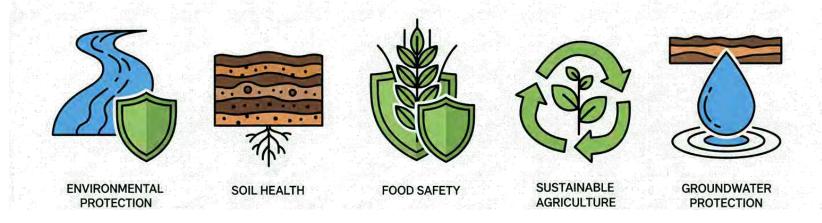
 Result: Risk of inadequately treated wastewater being used as fertilizer





## 2.9 Recommendations / Lessons Learned

- Include BOD and TSS monitoring for all Discharge Permits involving agricultural reuse of wastewater
- DENR, DA, DOH collaboration needed to align monitoring and safeguard public health
- Why regulate BOD/TSS even for reuse?



- Environmental Protection → avoid oxygen depletion, turbidity in rivers
- Soil Health → avoid anaerobic conditions, blocked pores
- Crop & Food Safety → prevent pathogens/heavy metals entering food chain
- Sustainable Agriculture → ensure wastewater reuse is safe & responsible



# 2.10 Lessons for WEPA partners:



