Appendix. Detailed Reform Proposals

Filipinos call for systemic reform after the flood control scandal

- First, we call on the DPWH and DBM to convene an multisectoral review committee to study current projects and resubmit 2026 proposals based on proper science. We call on the President to veto projects that do not adhere to proper science to send a strong and credible message to Congress.
 - a. We have very little confidence that the DPWH's proposed budget for flood control is backed by proper science.
 - i. Projects appear to be <u>misallocated to areas with little to no flood</u> <u>risk</u> while very little projects in areas with very high flood risk, based on NOAH maps.
 - ii. Officials have pointed to potential ghost projects and even "half-ghost" projects in the 2026 NEP that had already been funded in previous years.
 - iii. Projects have little to no coordination with local governments or consulted with local communities. Projects appear to be either overpriced, substandard, or delayed.
 - iv. Billions of flood control projects are inserted last-minute in the bicameral conference committee, without proper public scrutiny.
 - b. We recommend that the independent multisectoral review committee, created by a DPWH Department Order, be mandated to ensure that current projects, and 2026 plans, are based on science.
 - i. These must be based not on antiquated flood *control* principles with near-exclusive focus on cement, but instead emphasize flood management principles and nature-based solutions such as reforestation and watershed restoration.
 - ii. They must also review existing studies for the country's 18 major river basins, to serve as a basis for the planning, design, implementation, and results evaluation of projects.

- iii. The government should ensure that projects follow the 5Rs: the right projects, at the right cost, with the right quality, implemented by the right people, delivered right on time.
- c. We recommend that this independent multisectoral review committee include members of unimpeachable competence and integrity: flood management scientists and hydrologists, civil society organizations, faith-based groups, local government practitioners, and community groups and people's organizations most affected by flood risks and climate crisis.
- d. In their planned resubmission of the budget to Congress, we call on the DBM and DPWH to reallocate savings to rules-based social protection, education, health, and active and public transportation budgets, which have been defunded over the past few years.
- 2. Second, we call on the House and Senate to end the abusive practice of opaque congressional insertions, especially in the bicameral conference committee. We call for an #OpenBicam, an #OpenBudget transparency server that automatically reports online these project insertions, and for Congress to give budget monitors enough time to review insertions, not just as token observers but as resource persons.
 - a. Congressional insertions to the DPWH budget, prone to abuse, have ballooned since 2020, but reached record highs from 2023 to 2025 under the current administration.
 - Congressional insertions to the DPWH budget reached a net of P540 billion from 2023 to 2025, or a record-high average of 22% of the NEP.
 - ii. Recent investigations have shown that ghost or half-ghost projects being last-minute congressional insertions. Flood control projects are no longer just lodged in the DPWH flood management program budget. Many flood control budgets and local programs were subsumed under the convergence and special support programs budget of the DPWH, with big movements starting 2022.
 - iii. For the period 2018 to 2025, the biggest congressional insertions were put in convergence and special support programs (P828 billion, 83% higher than NEP), local program (P238 billion, 42% higher than NEP), asset preservation (P164 billion, 27% higher than

the NEP), and flood management (P23 billion, 2% higher than the NEP).

- b. The current House and Senate resolutions are not enough to promote genuine participation to prevent the practice of egregious insertions.
 - i. We call on the House and Senate to pass resolutions for an #OpenBicam and implement an #OpenBudget transparency server, similar to how election results are reported by the media and verified by independent watchers, so that people can see in real time what and who inserted projects in the budget.
 - ii. The open budget transparency server must automatically track online the insertions or deletions from the budget call to the NEP to H-GAB to S-GAB to BICAM to PRESIDENTIAL VETO to the final GAA (National Expenditure Program, House General Appropriations Bill, Senate General Appropriations Bill, Bicameral Conference Committee Report, the President's Veto Message, General Appropriations Act.)
 - iii. These proposals are technically feasible because there is already a system of unique identifiers in the budget, such as the Unified Account Code Structure (UACS) and Program Expenditure Classification (PREXC). In this light we call on DBM to prioritize and fast-track the Integrated Financial Management Information System (IFMIS).
 - iv. Both Houses of Congress must support the call of civil society to take them not only as token observers, but as actual resource persons in budget proceedings in the House, Senate, and Bicam.
 - v. Congress must give budget monitors and independent observers at least one week to review and comment before approval at each stage.
- 3. Third, we call on the President and DPWH to provide full and genuine transparency in the flood control projects in the past years.
 - a. The Sumbong sa Pangulo website, while a laudable first step in transparency, includes less than half of the total value of flood control projects budgeted from 2018 to 2025.

- b. In the website, only 9,855 projects worth P547 billion were tagged completed, compared to the total P1.2 trillion flood control projects budgeted over the same time period.
- c. This P1.2 trillion total even excludes the flood control projects inserted in the convergence and special support program budgets.
- d. We recommend that the President and DPWH publish the details of these other projects from 2018 to 2025.
- 4. Fourth, we call on the President, DPWH, DBM, and SEC to improve the quality of people's participation by providing the necessary documents for proper civic monitoring and potential citizens' participatory audits with COA:
 - a. Participation can be made truly meaningful if citizen engagement follows good practices in multi-level monitoring and accountability [Government Watch], while ensuring civil society monitors are treated as equal partners and given timely, relevant, and adequate information [Social Watch, People's Budget Coalition].
 - b. While Project DIME and Sumbong sa Pangulo aim to improve citizen participation in the monitoring of DPWH projects, these platforms lack critical documents to ensure participation in monitoring is meaningful.
 - c. We recommend that the DPWH and SEC make these documents free and available to the public: the program of works, the bill of quantities, the detailed unit price analysis [Mayor Vico Sotto], the audited financial statements, the general information sheets, the articles of incorporation, which are all expensive and difficult to acquire, but are critical to understanding the ultimate beneficial owners of winning contractors, including their financial, technical, and legal eligibilities [R2KRN]
 - d. We recommend that the DBM fast-track the publication of the ultimate beneficial ownership registry online, mandated under the New Government Procurement Act;
 - e. We recommend that the Commission on Audit revitalize citizens' participatory audits of the riskiest flood control projects [ANSA-EAP, Hivos Southeast Asia, PCIJ].

- f. We call on the revitalization of a civil society movement to train a new generation of independent civic monitors and investigative journalists.
- g. We call on the DBM to fast-track the beneficial ownership registry mandated under the New Government Procurement Act, and the open contracting data under the PhilGEPS as outlined in the country's entry to the Open Government Challenge. We call on the government to learn lessons from local and global case studies such as Assam, India's open contracting system which used flood risk maps to plan their interventions better, or Taiwan's Government Procurement Integrity Platform that created a multisectoral body for big ticket infrastructure projects and required projects to set up websites with 24/7 CCTV monitoring and public disclosure of monitoring documents.
- 5. Fifth, we call for accountability. Dapat may managot. We call on the proposed independent commission and investigation and enforcement bodies to investigate and file cases not just against contractors and the DPWH, but legislators and auditors who were accountable for these flood control projects. We call for the passage of a genuine Freedom of Information Law and a Beneficial Ownership Transparency Law that can help us safeguard.
 - a. **Systems of accountability** in the country are weak with very few "big fish" and "masterminds" convicted. Initial energies in controversies may devolve to witch-hunts of "small fish" or "mid-level managers" that end up maintaining systems of corruption.
 - i. We have a lot of accountability systems on paper, but these are not effective enough in curbing corruption.
 - ii. Key enforcement arms are weak:
 - 1. a weak appointed Ombudsman [R2KRN],
 - conflicts of interest in investigative bodies in Congress [De Lima, Diokno] leading to public cynicism that rule of law exists.
 - an opaque campaign finance system that allows politicians and contractors to collude and be trapped in a vicious cycle of utang na loob [PCIJ],
 - 4. a system that encourages patronage instead of rules-based social protection [PBC],
 - 5. a culture that celebrates instead of shames corruption [Cardinal David].
 - iii. We are all accountable: maybe not by commission, but by omission. We must choose to reject and dismantle the deeper roots of corruption.

- iv. It is good that DPWH Secretary Vince Dizon's direction for DPWH leadership to file courtesy resignations and engaging in a comprehensive personnel review. It is also good that Secretary Dizon is blacklisting some contractors for life and requesting watch orders with the Bureau of Immigration, but we need to blacklist and watch not just the contractors but their ULTIMATE BENEFICIAL OWNERS of these companies.
- b. We call on the President's planned independent commission to be staffed with independent members with unimpeachable integrity, and that its mandate be made clearly defined so that it is effective.
- c. We call on the President to convene an independent body to review the whole budget process: from preparation, legislation, execution, and accountability, from planning to disbursement, including the roles of all agencies involved.
- d. We call on the overhaul of the PCAB [Lacson] and demand that PCAB (supervised by DTI CIAC) immediately suspend, and for the DPWH to continue blacklisting the biggest contractors, and contractors' groups involved in ghost or anomalous flood control projects, including seemingly smaller contractors that also have related companies or ownership structures.
- e. We call on the President to appoint a truly independent Ombudsman that will fearlessly file cases, and lift the secrecy on Statements of Assets, Liabilities, and Net Worth. [R2KRN]
- f. We call on the COMELEC to investigate politicians who received campaign contributions from contractors who benefited from the flood control scandal. [Rappler, PCIJ, GMA News] We also laud Comelec's efforts to digitalize the submission of SOCE and call on COMELEC to immediately open the data submitted at least in the last election cycle.
- g. We call on the Commission on Audit (COA) to expand its fraud audit beyond Bulacan to all provinces with high contractor concentration. Forensic audit priorities Technical inspections must verify physical existence of all reported projects, particularly those worth over ₱100 million. Financial audits should trace fund flows from government disbursements to contractor accounts, identifying unexplained wealth accumulation. Procurement process audits must examine bid documents, evaluation criteria, and award decisions for evidence of manipulation or

- collusion. Corporate structure investigations should identify beneficial ownership of contractor firms and potential shell company arrangements.
- h. We call on the Bureau of Internal Revenue (BIR) to complete tax fraud audits of all 15 dominant contractors, focusing on undeclared income from inflated contracts.
- i. We call on the Anti-Money Laundering Council (AMLC) to intensify investigations into suspicious financial transactions linked to these contractors. Criminal charges must be filed against contractors and officials involved in ghost projects and procurement fraud.
- j. We call for the passage of a genuine Freedom of Information Law and a Beneficial Ownership Transparency Law covering not just public contractors but those who have public-private partnerships and joint ventures, such as those in the extractives industry.