

LEAGUE OF CITIES OF THE PHILIPPINES

09 September 2019

DIR. ANNA LIZA F. BONAGUA, CESO III

Bureau of Local Government Development Department of the Interior and Local Government DILG-NAPOLCOM Center, Quezon City

Dear Director Bonagua:

This has reference to an email communication we received from your office requesting feedback on the draft memorandum circular on the "Guidelines for Regulatory Reforms Pursuant to EODB-BGSD Act of 2018."

We thank you for furnishing us with a revised draft in consideration of the suggestions made during the consultation meeting on 22 August 2019. We highly appreciate that the recommendatory role of the Anti-Red Tape Authority (ARTA) was established in amending the business-related ordinances local government units (LGUs) under Republic Act (RA) 11032. We also welcome the streamlining of the Regulatory Reform Team' (RRT) membership and giving the LGUs some discretion in forming their respective RRTs.

Having said this, we see the importance of the Department of the Interior and Local Government (DILG) in providing the LGUs with a general list of local ordinances that possibly are for amendment pursuant to RA 11032. Having such reference will give them a starting point for stocktaking, review, and reform. Likewise, a manual for localizing the implementation of RA 11032 and a pool of experts coming from the ARTA will ensure accurate compliance with the law. Accordingly, we hope that these could be accommodated as part of the functions of the DILG and the ARTA, amending for this purpose sections 7.1 and 7.2 of the draft memorandum circular. Finally, the timeline for the implementation of the memorandum circular needs adjustment considering that the Implementing Rules and Regulations (IRR) for RA 11032 has already been published on 22 July 2019.

We are thankful for the inclusive approach the DILG has taken in developing guidelines for LGUs in compliance with national laws. Rest assured of our steadfast cooperation with the Department in similar endeavors.

Very truly yours,

ATTY SHEREEN GAIL YU-PAMINTUAN

Executive Director