

Chapter 6

6.0 Implementation Arrangements

6.1. Organization for Plan Implementation

At the Municipal level, the Ecological Solid Waste Management Board is the implementing body that will look over the municipality's SWM processes and programs. The ISWM – TWG will be the group to manage the implementation of the policies and plan of the LGU on SWM. The respective offices that lead the operation of ESWM are Mayor's Office, Engineering Office, MPDC, Budget and Accounting Offices and the Committee on Environment from the Sangguniang Bayan (SB).

6.1.a. ESWM Board

The Municipality of Jagna created the Ecological Solid Waste Management (ESWM) Board, emanating from the mandates of RA 9003, known as the Philippine Ecological Solid Waste Management Act of 2000. The ESWM Board, which is chaired by the Municipal Mayor, is the mandated SWM policy-making body of the municipality of Jagna through Executive Order (EO) No. 07. It shall have the following functions and responsibilities:

- a. Develop the SWM Plan that will ensure the long-term management of solid waste, as well as integrate the various solid waste management plans and strategies of the barangays of the municipality;
- b. Adopt specific revenue-generating measures to promote the viability of its SWM plan;
- c. Develop the specific mechanics and guidelines for the implementation of the municipal SWM plan;
- d. Oversee the implementation of the municipal SWM plan;
- e. Monitor the implementation of the municipal solid waste management plan through its various political subdivisions and in cooperation with the private sector and non-government organizations (NGOs);
- f. Coordinate the efforts of the component barangays in the implementation of the plan;
- g. Recommend to appropriate local government authorities specific measures or proposals for franchise or build-operate-transfer agreement with duly recognized institutions to provide either exclusive or non-exclusive authority for the collection, transfer, storage, processing, recycling or disposal of solid wastes;
- h. Review every two years or as the need arises the municipal SWM plan for purposes of ensuring sustainability, viability, effectiveness and relevance in relation to local and international developments in the field of SWM;
- i. Adopt measure to promote and ensure the viability and effective implementation of solid waste management in component barangays;
- j. Convene regular meetings for purposes of planning and coordinating the implementation of the SWM plans of the respective component barangays;

- k. Provide the necessary logistical and operational support to component barangays in consonance with the Local Government Code; and
- l. Recommend measures and safeguards against pollution and for the preservation of the natural ecosystem.

It is a multisectoral group with 14 members from various Government Agencies to highlight the Sangguniang Bayan, various LGU offices selected national agencies, and the private sector. Annex 2.b is a copy of the EO creating the ISWM board of Jagna. Its composition complies with the requirements of RA 9003. As plan implementation proceeds, the Board will determine the need for the inclusion of other sectors.

The Board intends to meet quarterly, on the first Friday of the beginning month of each quarter. However the chair of the board can call special meeting, as the need arises to talk matters regarding the solid waste management program implementation. Annex 2.d is a copy of the working protocol of Jagna of once a month for the first year of plan implementation.

The ESWM Board intends to retain the already functional Technical Working Group (TWG). The TWG will assist the Board on matters and activities beyond the capacity of the Proposed MENRO. Coordination with the proposed MENRO is necessary. Activities that may be undertaken by the TWG are assistance to the proposed MENRO in the conduct of more detailed planning on specific component of the ISWM program; formulation of studies and analysis; conduct of once a year waste characterization and other activities assigned by the Board.

6.1.b. *Municipal Environment and Natural Resource Office (MENRO)*

At present the LGU of Jagna has a existing organization managing the services of present solid waste services in the municipality. Figure 6.a illustrates how the present organization is structured. It has an officer-in-charge to manage the operation of collection and disposal, and to include the maintenance of the cleanliness and sanitation of its public market. However, because of the wide range of responsibility in managing the solid waste program, it has become imperative the an office shall be created solely for the purpose of implementing environmental projects. Hence then, the LGU envisioned to create a body to be named Municipal Environment and Natural Resource Office or MENRO. This organization's main function is to take charge in the implementation of various environmental programs to include coastal resource management, forest and upland management, and specifically the solid waste management program.

The MENRO on the other hand shall be the implementation arm of the municipal ISWM Board. It shall be under the direct supervision of its local chief executive, who likewise is the chairman of the board. The MENRO shall serve as the lead office in all preparation arrangements and the implementation of the ISWM plan of the municipality. It shall work hand in hand with the TWG and ensure that all operations and activities regarding ISWM shall be well coordinated with the LGU, to include those from other agencies, NGOs and private organizations. Further, it shall ensure that all ordinances and other related policies and guidelines with respect to ISWM is thoroughly enforced.

The MENRO will be established in year 2007. The functioning divisions/offices proposed to be under the MENRO such as the ISWM division will be established earlier asin year 2005. In transition, the division will be holding office directly under the Office of the Mayor.

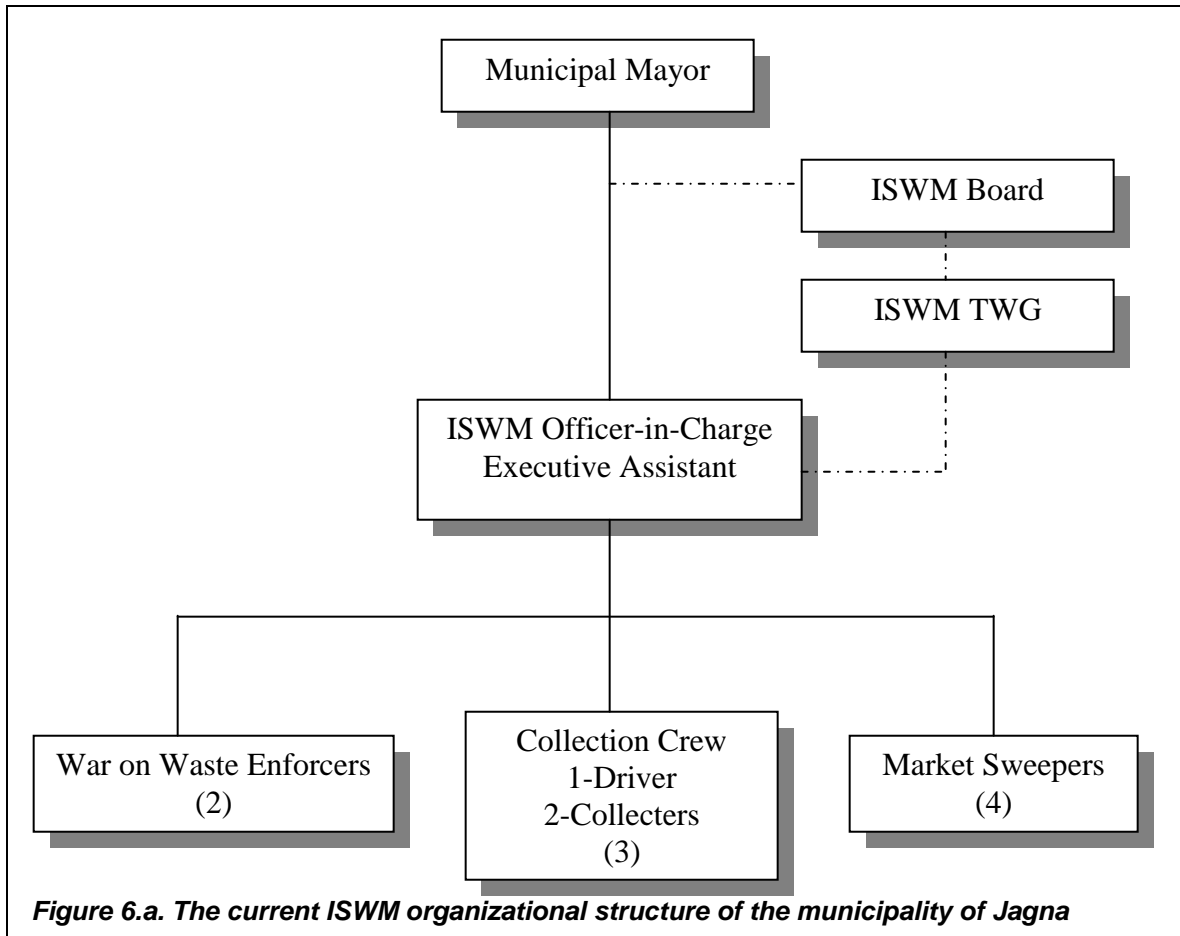


Figure 6.a. The current ISWM organizational structure of the municipality of Jagna

6.1.c. ISWM Division

Under the MENRO is a division for solid waste management, the ISWM office. The division shall be headed by an ISWM officer who shall be responsible to look over the implementation of the mandates of RA 9003 and the requirements of the ISWM plan. The officer shall ensure that impacts in the practices of waste generation disposal is felt after the implementation of the program. The office shall have at least 5 units under its full supervision. These are the Enforcement Team, Collection and Transport Crew, an MRF Office, Streets and Market Sweepers and the SLF office. Each of these units have their specific functions which shall complement with the ISWM plan of the municipality. Figure 6.c. illustrates the operation structure of the ISWM office. Of the proposed structure and personnel, only the collection crew and the market sweepers are currently available. This compliments the LGU's initial services on the their SWM program.

Under the ISWM division of the MENRO includes units for Enforcement; Collection; Street and Market Maintenance (Sweepers); MRF; and SLF office. Functions from each section shall be so designed in order to complement from each to achieve common goals in implementing the ISWM plan.

The ISWM Division shall have the following functions and responsibilities:

- a. Organize waste enforcement team and coordinate with the PNP Environmental Desk Officer (PEDO) for the enforcement of all ISWM related ordinances and policies;
- b. Coordinate with the assigned agencies and units including NGOs in the conduct of IEC campaign activities;
- c. Monitor and evaluate range of compliance with respect to reduction and segregation at source, to include backyard composting per barangay;
- d. Technical assistance, logistical and training support to barangays and communities to help them formulate SWM strategies and plans, and implement, monitor and evaluate SWM projects;
- e. Formulation, review and refinement of procedures for SWM operations and enforcement, including coordination with groups and sectors providing support to the SWM program;
- f. Formulation, review and refinement of incentives and command and control systems to reinforce the proper practice of solid waste management;
- g. Periodically prepare reports on the performance status and analysis of implementation and enforcement of solid waste management ordinances;
- h. Undertake efficient collection system;
- i. Manage the Central MRF and provide technical assistance to Barangays for the establishment and operation of their respective MRFs;
- j. Take the lead in the in-house feasibility study, planning, establishment and operation of the proposed Jagna cluster SLF;
- k. Manage the proposed hosting of a cluster SLF;
- l. Manage and monitor the ISWM trust fund; and
- m. Prepare annual work and financial plans.

The ISWM Division shall further serve as the secretariat of the ESWM Board. The periodic reports on SWM that it will prepare will be submitted to the Board. It shall conduct research and data analysis to support the policy-making function of the Board. The annual SWM work and financial plan will be submitted to the ESWM Board for its endorsement to the SB so such can be included in the annual budget of the municipality. It shall keep record of all meetings and decisions of the Board, and ensure that such decisions are carried out. The full personnel complement of the ISWM Division is shown in the table below.

Table 1
ISWM Division Staffing Pattern and Deployment Schedule

Unit/Personnel	Status	Deployment Year	No.
1. ISWM Division a) ISWM Division Chief	For Creation	2005	1
2. Collection and Sweepers Section a) Foreman b) Driver c) Collection helpers d) Sweepers	For creation Existing For creation Existing For creation existing	2005 - 2005 - 2005 -	1 1 1 2 2 5
3. Enforcement Section a) PNP PEDO b) Deputized enforces	Existing For deputization Existing	- 2005 -	1 1 2
4. MRF Section a) Clerk/Supervisor b) Composter c) Segregator	By job order By job order By job order	2005 2005 2005	1 1 1
5. SLF Section a) SLF Operator b) Checker/Supervisor c) Laboratory technician d) Equipment Operator e) Utility Workers	By contract-yr 1 only By job order By job order By job order By job order	2007 2007 2007 2007 2007	1 1 1 2 2

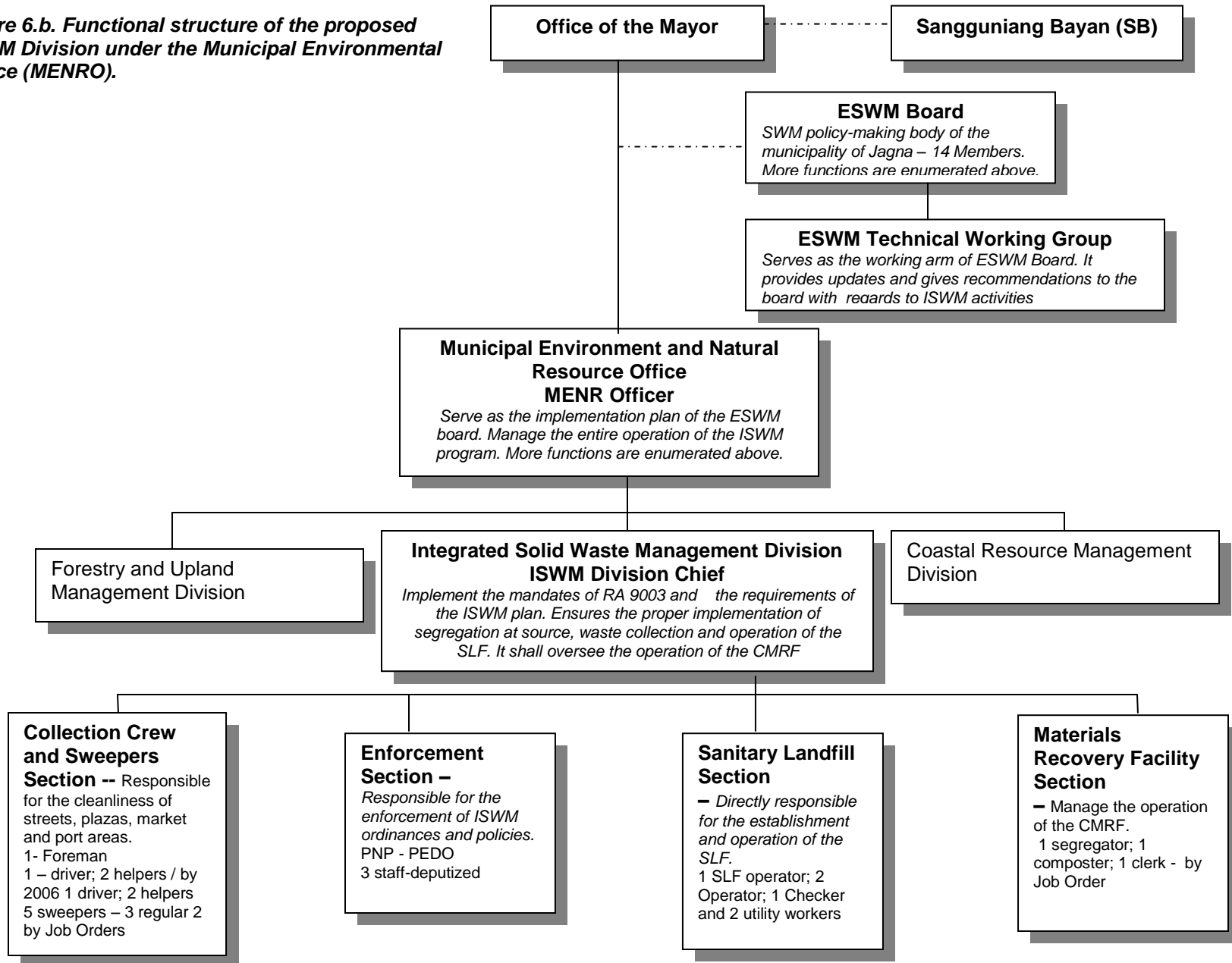
All newly hired personnel will be provided with relevant orientation and training in SWM. The following training programs have been identified to be essential subject matters to before the full operation of the ISWM office.

- Planning of waste collection routes and vehicle scheduling, including the conduct of time and motion study;
- Proper handling of different types of waste (for collection staff);
- Feasibility study preparation;
- Community-based IEC;
- MRF operations and management, including the operation of MRF equipment/machines;
- Management and operations of controlled dumpsite, including closure and post-closure care;
- Management and operations of SLF;
- SWM regulations and ordinances and enforcement procedures;
- Financial management;
- Performance monitoring, including recording, database management and report preparation.

There will be regular staff performance evaluation, which shall be the basis for the renewal of contracts/rehiring and grant of incentives.

Shown in Figure 6.b is the proposed functional chart of the municipal Environmental office with the proposed number of personnel per unit of the ISWM office.

Figure 6.b. Functional structure of the proposed ISWM Division under the Municipal Environmental Office (MENRO).



6.1.d. Barangay SWM Committees

Barangay Solid Waste Management Committee (BSWMC) is created pursuant to the requirement of RA 9003. It's major function is to implement a Barangay solid waste management system that shall complement the SWM plan of the municipality, and consistent with the provisions of the law. It shall also assist in the conduct of IEC campaigns especially in the rural areas, focusing on the strategies imposed to households and other small-scale business establishments, such as the following: 3 or 2 containers for waste segregation at urban and rural Barangays respectively, segregation at source, biodegradable waste composting and non-collection, fines and penalties and the incentive program proposed by the LGU. In addition, the committee shall assist in the implementation of SWM laws and ordinances applicable in their Barangay.

The BSWMC shall initiate in the establishment of a Barangay Materials Recovery Facility (BMRF). It shall create networks with the municipal LGU and other NGOs or organization and junkshop to support and plan for the operation of the MRF. Further, it shall establish a collection system for its recyclable and residual/special waste, in coordination with the municipal LGU. Means of collection shall be determined by the BSWMC. It shall be responsible for the awareness of the types of waste produced in their locality. Regular Barangay and Purok assemblies shall be conducted to monitor and evaluate the impact of the ISWM program. Figure 6.c below shows the coordination link between the municipal ISWM structure and BSWMC.

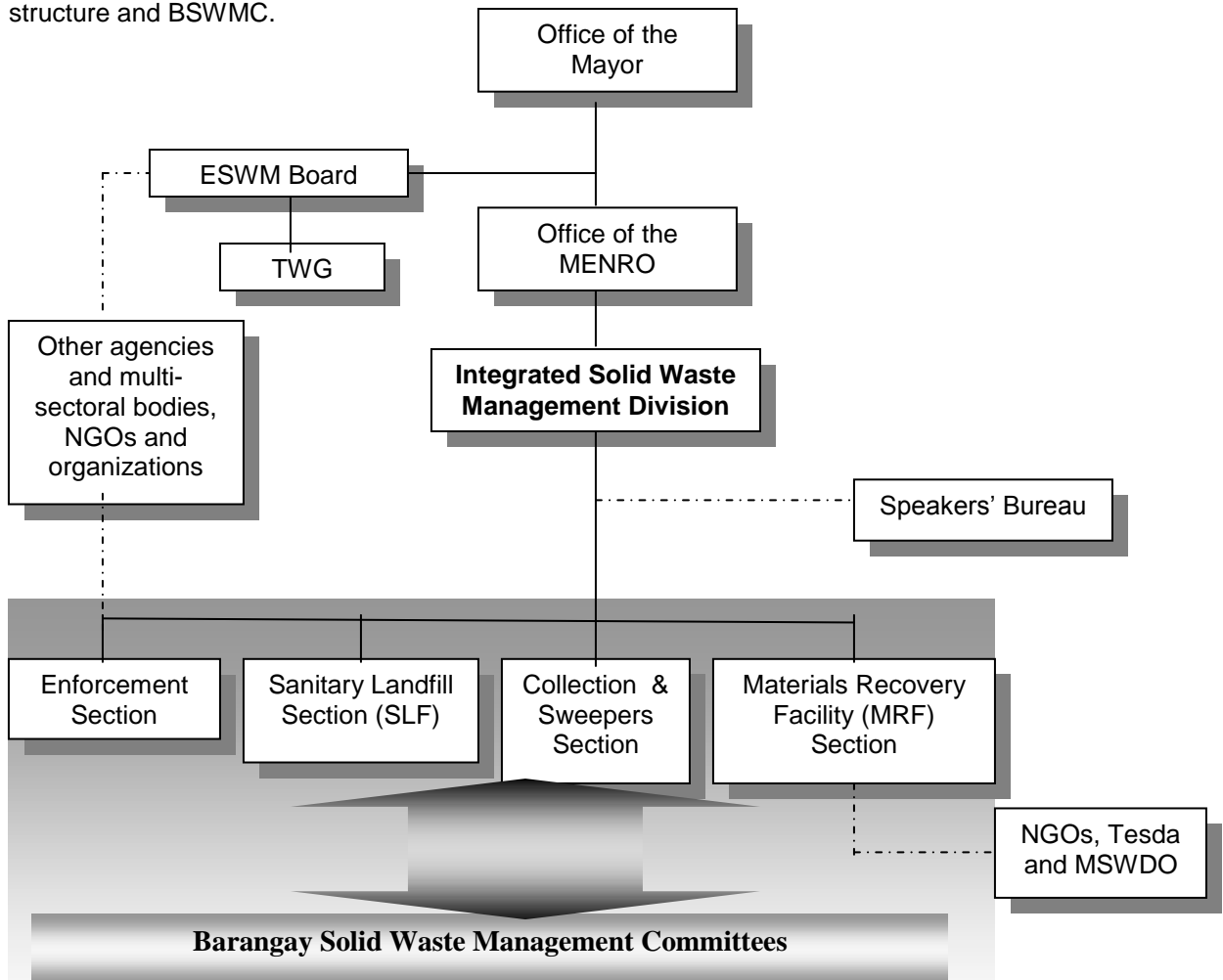


Figure 6.c. Operational Structure of the municipal ISWM office

Aside from these, the BSWMC shall work to participate in contests sponsored by the LGU of the municipality or by any National Government Agencies (NGA). Such contests as Clean and Green Program, Model Barangays, Most Outstanding Barangay in Solid Waste Management and the likes.

Other functions of the BSWMC as defined by RA 9003 and its IRR includes the following:

- Formulate solid waste management program consistent with city municipality plan;
- Segregation and collection of biodegradable, compostable, reusable wastes;
- Establish materials recovery facility;
- Allocate barangay funds; look for sources of funds;
- Organize core coordinators; and
- Submit monthly report to city or municipal ESWMB.

6.1.e. Other Agencies and Multi-Sectoral Bodies and NGOs and Civil Society Organizations

Multisectoral Bodies.

Speaker's Bureau for IEC. The LGU-initiated Speaker's Bureau, composed of selected members of the different BSWMCs, will have to be provided with sufficient trainings, technical guidance, IEC materials and logistical support relevance to SWM. Subjects shall mainly focus on the general strategy of the LGU in implementing their ISWM program. Such as the types and classification of wastes, 3 or 2 containers segregation system, segregation at source, composting, collection schedule and route, the 3 R's, MRF operation and the controlled dumpsite and SLF. In coordination with the TWG and the MENRO, the bureau in succeeding years, shall develop and plan IEC materials using the tri-media of print, radio and television, moreover its distribution and dissemination.

Volunteer Enforcers for SWM enforcement. The volunteers will need to be provided with orientation and training on RA 9003 and local ISWM ordinances, and the enforcement mechanisms as created by the Board. They will be deputized by the municipal LGU and provided with logistical support. They shall be well versed and equipped with thorough understanding of the law as provided for the enforcement of the SWM plan. In coordination with the regular enforcement team from the MENRO, they shall organize and establish enforcement schedules and plans to include area of assignment and turnover partners.

Each volunteer enforcers will be assigned specific area or street in the municipality where he/she will enforce the ISWM laws and ordinances. They will collect fines and penalties from violators as prescribe by the ISWM ordinance. Volunteer enforcers will also be assigned to accompany each of the collection crew and ensure compliance to segregation and waste reduction (particularly non collection of biodegradable). The volunteer enforcer will collect fees and fines from non-segregators and for the collection of biodegradables. The deployment of volunteer enforcers will be mandated under the ISWM ordinance. The mayor will give the volunteer enforcers the authority to function as such. They will be provided with identification card. When necessary, they will be bonded by the treasurer's office as they will be collecting revenues in the form of garbage fees, fines and penalties.

Monthly meeting will be organized within the first two years of deployment of the volunteer enforcers. The MENRO on the other hand, will organize quarterly meetings with the regular LGU and volunteer enforcers for an assessment of enforcement performance and discussion of issues and problems. Less frequent meetings will be held in subsequent years.

Civil Society / Private Sector Organizations

Church. The church shall be tapped to assist the implementation of the SWM plan. It shall focus its assistance in the conduct of IEC campaign. The church however will be provided with adequate orientation on SWM, giving emphasis on the general strategy of the municipal SWM plan. Its methodology shall be through announcements during Sunday masses with target church goers. Also they shall adopt waste segregation, composting and recycling/reusing in order to serve as models to others.

Media Establishments. These includes the Radio Natin radio station in the municipality of Jagna and the San Miguel Cable TV Network. These entities shall assist the speakers bureau and the MENRO in the planning, production and airing of IEC jingles, and other TV ads. In coordination with the MENRO, they shall conduct weekly ISWM program or time slot for TV and Radio networks. Cooperate with the LGU's announcements, as the need arises, relative to the implementation of the SWM program.

JAMAVEA and other vendors association. Jagna Market Vendor's Association and all other vendors association, shall take responsibility of implementing the strategy on waste segregation at the public market. Likewise, they shall act as models to buyers in the practice of segregation. Part of their tasks shall be to educate consumers on the use of biodegradables as a good alternative packaging materials and ask to bring recyclable containers to minimize the use of plastics and other non-compostable / recyclable containers. They can further act or involve as volunteer enforcers for the SWM implementation. Hence enough orientation and seminars shall be provided to the group for thorough understanding and awareness of the impact of the SWM and the general strategy the LGU planned to adopt.

JAMCODA. Jagna Motor Cab Operators and Driver's Association, shall likewise be tapped by the ISWM office to assist in the implementation of the SWM program. They shall in effect take the responsibility of implementing the SWM plan in terminals, ports and other major routes in the municipality. It shall be their responsibility to educate commuters on the proper waste disposal. In addition they can also act as volunteer enforcers in the municipality to implement the ordinances and regulations provided for compliance in public areas like terminals and conveyance. Because of their mobility, they shall also act as mediums in the distribution of IEC materials in the likes of flyers and leaflets. Posters and streamers, if applicable can be posted in their vehicle for public viewing.

Business Establishment Operators. This sector of the society shall hold a key responsibility in the success of the SWM program implementation in the municipality. Because of the goods, people everyday purchase, it is their role and responsibility to provide information on the proper waste segregation at source, in establishments and in most public places. By insuring that by themselves, segregation is practiced, consumers shall likewise be educated on the proper segregation and management of wastes. Further, in coordination with the municipal MENRO, posters shall be posted in fronts of their establishment for public viewing and awareness and to signal their cooperation and commitment to the program.

JOFEMCO AND JAMES. Jagna Officials and Employees Multi-purpose Cooperative and Jagna Association of Municipal Employees. Role models are role models. Considering that the ISWM plan was crafted by the officials and decision-makers of the municipal LGU, it is but very critical that the people around the organization likewise show commitment and compliance to the plan. Charity begins at home can likewise be associated by compliance begins by the law. They shall make sure that proper waste management, consistent to the general strategy for implementation is practiced in every office of the LGU. They shall complement in any means the conduct of IEC campaigns by the MENRO. They likewise shall participate in any other enforcement and IEC activities through volunteers and the speaker's bureau.

Schools and PTA. Recognizing that schoolchildren are effective conduit of information to households, schools and PTAs shall be tapped to support the implementation of the SWM plan. Their main responsibility is to ensure that information on proper waste management, segregation, composting, materials recovery, disposal shall be disseminated effectively to its students and pupils. Information drive shall be integrated in the curriculum as one item in their subject regarding environment. Likewise, the school shall practice the principles of segregation and composting in their area. They shall act as the models for the schoolchildren who in return shall bring this understanding and practice at home. The school shall likewise get involve in the speakers' bureau, during IEC campaigns. In coordination with the municipal MENRO, it shall plan, design, and assist in the development of IEC materials for dissemination. Distribution of flyers and leaflets to children is also one of their functions. The PTA on the other hand shall develop SWM initiative projects in the school premises, e.g. construction of compost pit or pile, conduct training and/or seminar on waste recycling and production of indigenous products from recyclable materials and plastics like, candles, floor wax, wall decoratives, necklace, etc. The PTA shall sponsor contest on poster making, slogan writing, poetry, news writing and the likes and provide cash prizes for its winners.

Hospitals and Clinics. Because of its potential to generate toxic and hazardous wastes, these establishments shall install and operate special waste disposal system to treat their own special wastes. This system shall be in addition to the usual 3 container system of segregated waste in their establishments. The said facility shall be made open for the MENRO office for monitoring and control. It shall be the responsibility of these establishments to educate its staff and employees on the proper SWM and the proposed strategies the LGU planned to implement in the next ten years in the municipality.

6.2. System for Procurement and Contracting

The plan provides the following opportunities for procurement and contracting with the private sector:

- Acquisition of big items of equipment and facilities, i.e. collection conveyors, MRF equipment and SLF heavy equipment.
- Conduct of feasibility, Project Description preparation and EIA studies of SWM facilities by accredited agencies;
- Site development and design of the landfill;
- Construction of city MRF, together with its composting facility (and possibly some aspects of the operation and management of the MRF);
- Marketing of MRF products (and possibly the transport of processed products);

- Construction of the sanitary landfill (and possibly some aspects of the operation and management of the sanitary landfill);
- Maintenance and repair of heavy equipment;
- Maintenance of the Controlled dumpsite and the SLF.
- SWM capacity building trainings by accredited trainers.

The procurement system of the Municipal LGU of Jagna is through its Bids and Award Committee which is adopting the set of rules and regulations of The Republic Act No. 9184, otherwise known as the Government Procurement Act. All procurement activities from procurement planning up to contract implementation and termination, the LGU of Jagna is strictly following and applying the implementing Rules and Regulations of R.A. No. 9184. The municipality see to it that transparent, competitive and participatory procedures will be followed in the bidding and award of the contracts and that there will be periodic assessment of the performance of the contractors.

6.3. Incentives Systems

The city LGU will adopt some incentives systems to help promote its SWM program. The following are being considered:

- Conduct of the annual search for Most Outstanding Barangay in SWM Implementation. The LGU by itself, through its MENRO shall develop the guidelines for the contest, with criteria on the four elements of the SWM which are, Reduction/segregation at source, collection & transport, MRF and disposal. Guidelines shall follow the strategy as set by the LGU to the barangays.
- Provide incentives on households, individuals consistently the practice of waste segregation and reduction at source. The MENRO shall organize surveillance team to monitor and observe several practices at source and during collection.
- Public announcements and recognitions, during puroks and barangay assemblies on households, sitio, barangays which is found to follow the SWM system as provided for to barangays and households.
- Conduct poster, slogan, and news writing contest and shall be aired in both radio and TV networks which shall encourage participants from all ages.
- Commendations and cash incentives to enforcers based on the apprehensions that they make.

6.4. Performance Monitoring and Evaluation

There will be a Monitoring and Evaluation system to be establish within the MENRO for the operation of its environmental programs, to included the SWM. For the ISWM office, every unit of the office shall submit monthly, quarterly and annual reports, through their team leaders, on their respective operations. These standard reports will be submitted to the MENRO officer, who will then prepare the integrated report for the ESWM Board. After its review, the Board will endorse the report to the Municipal Deveopment Council (MDC), the SB. Copies of the report will also be made available to other interested parties, with important statistics posted in public bulletin boards.

Although formal reporting will be on a monthly basis, the various operating units within the MENRO will maintain their own recording and reporting systems, which should allow them

to systematically generate, consolidate and analyze the required data even on a weekly basis or as the need arises by the ESWM Board and LGU management.

The periodic reports, which will be on per unit of the office basis shall contain these basic informations:

- *Enforcement team:* types of violations recorded for the period; number of violators apprehended, number of cases file, if any, with the corresponding violation committed, total amount of fines and penalties collected. The kind of violation normally committed, issues and concerns in enforcement and recommendation for improvements. Other highlights during the operation of enforcement shall also be reported and put into writing.
- *Collection and transport:* estimated volume of waste collected from households and other waste generators, by type; environmental management fee collected by source. Potential barangay or household who practice or not practice segregation at source and the proper containers or receptacles used as prescribe in the general strategy of the plan and its ordinances and guidelines.
- *City MRF operations:* weight or volume of waste received; weight or volume of recovered materials; weight or volume of recyclables sold; weight or volume of compost materials/fertilizers produced and disposed; income generated from sale of recyclables and compost/fertilizer. Likewise, the type and quantity of products produced and sold. The list of NGOs and other organization contributing to the whole operation of the MRF.
- *Disposal facility operations:* weight or volume of residual and special waste brought to disposal site. Other private entity, if any, dumping residuals or special waste in the dumpsite. During the operation of the LSF, how much tipping fee is generated. Condition of the landfill or dumpsite shall also be regularly report. This shall also include the condition of the dumpsite, in terms of smoke and other gas emmitance, the presence or absense of scavengers and/or stray animals in the sorroundings. Likewise highlights and issues on the whole operation and condition of the facility shall be reported and submitted for updates and recommendations.

The MENRO shall consolidate this reports and provide an analysis of the data to reflect % compliance with segregation requirement, payment of fees and other SWM ordinances and regulations and guidelines; waste collection efficiency with current collection route and vehicle fleet; % recovery efficiency of Central MRF; “transfer rate” of recyclables in the MRF (from time of delivery to MRF to time of delivery to buyer); % contribution of other barangays/LGUs to recyclables brought to MRF and to the disposal facility; and revenue generation vs operating cost for each type of operation. Analysis on the quantity and types of recycled products generated shall likewise be given special attention. This analysis shall be the basis of potential trading and or marketing outside the municipality or even in areas like Cebu or in Mindanao. Other production potentials which requires external expertise or assistance shall be taken into the report for recommendation and cause of action.

Generally, the effectiveness and consistency of the IEC campaign shall likewise be determined. In the report, strategies on the IEC campaign shall be re-assessed and re-established in cases where negative feedbacks are observed. Otherwise, the existing strategy relative to information campaign shall take its track. On the other hand the intensity of the IEC shall likewise be set considerably on the outcome of the report.

Periodically, the MENRO, in coordination with the municipal ESWM board and its TWG shall conduct their in-house seven-day waste characterization at the disposal site on a daily sample of collection trucks. The same methodology should be used in order to establish comparisons with the existing data and the previous data generated. The result shall determine if there is a significant reduction of these materials at the end-of-pipe of the waste stream. Survey on the perception and awareness of the LGUs efforts in improving solid waste situation in the municipality shall likewise be conducted. Moreover, present practice on the management and disposal of waste shall also determine the effectivity of the IEC campaign.

On the other hand, in order to provide feedback at the external perspective of the SWM operation, the LGU, through its ESWM board planned to create a Multi-Sectoral M and E body to look into the more comprehensive SWM performance of the LGU. However the composition of the body is still pending for more studies on the right agencies, organizations or individual who shall have the best interest of assessing the performance of the whole SWM operations.

There will be a semi-annual assessment activities to be conducted by the M&E Body. These shall include the assessment on physical condition of the tools and equipment used by the ISWM office in enforcing and/or implementing the SWM program. This also includes, observations of the different SWM operations like, collection, MRF, SLF and even the practice of segregation of wastes at different sources. The body shall likewise validate the reports submitted by MENRO through the conduct of separate suveys and interviews and by re-examining the data gathered in their reports.

These reports shall then be endorsed to the municipal ESWM Board and shall be made available for public consumption.

6.5 Constraints to Implementation

Even with the full support of the LGU and other actors of the ISWM program the following will constraint the successful implementation of the ISWM plan:

1. poor and lax enforcement of the ISWM laws and ordinances given the “tayo-tayo” trait of the Filipino or lack of cooperation of the constituents to follow the ISWM laws and ordinances;
2. difficulty in complying the requirement for fund sourcing or no private investor for the cluster SLF; and
3. changes in local administration may lead to less support or priority given to ISWM.