

**Comments on House Joint Resolution No. 3** entitled “Joint Resolution Ordaining a Glossary of Significant Housing Terminologies for Adherence by the Key Shelter Agencies, Other Appropriate Agencies of Government, and Other Housing and Urban Development Stakeholders”.

1. The PIDS concurs with the objective of the Joint House Resolution No.3 on the need to come up with a standardized definition of significant housing terminologies to address ambiguity in the use of housing terms and to have a common understanding of these terms at the national level. In particular, the PIDS was among the agencies that supported the conduct of the 2015 National Housing Summit and contributed to the list of housing terminologies that are contained in the Glossary.
2. However, we recommend further improvements in the final form of the Glossary. In particular, there is a need to clarify how the terminologies have been categorized into “National” and “Operational”. As stated in the Joint Resolution “National” is defined from “national laws and general acceptance” while “Operational” is based on “administrative issuance and in context of project, program and framework”. There is a clear overlap in terms and definitions as administrative issuances are also derived from national laws and vice versa. We suggest for clarity and better organization that the Glossary adopts one category (Significant Terminologies) and refer to the operational definition of the term (if applicable) to the specific code or administrative order (e.g. basic services, block, attic storey, firewall, etc.) since the operational definitions are likely to change more often.
3. Relatedly, the unclear classification of terminologies into national and operational has inadvertently misclassified significant or important terminologies as purely operational (e.g. NO Build Zone) which is a key term in the Water Code, Forestry Code and Civil Code. Moreover, the basis for the classification also confuses. For instance, why are terminologies such as “frontage”, “sidewalk”, “balcony”, “true sale”, “footing”, “ground floor” etc. classified as “National” while terms such as “alley”, “built-up areas”, “vertical housing”, “bond guaranty coverage”, etc. are listed only in the “Operational”.
4. The Glossary has also to be clear about the sources of the definition. In some cases, the source is clearly specified referring to the definition taken from the National Building Code, IPRA law, UDHA, HLURB, etc. but in most cases, there are no identified source(s), thus one wonders if the definitions were taken from “Google” or was based on combined definition of different agencies.



5. It is also important to point out that in the case of “accumulated housing needs” and “tenure security”, the glossary does not identify the Philippine Statistical Office, or Census of Housing or NEDA or HUDCC as the source of this definition. The same observation applies to “Environmentally critical area” which is also defined under DENR laws. It is important to provide the source(s) specifically for general terms that are also used similarly in other sectors thus indicating general acceptance of the definition at the national level and possibly also conforms with international standards.