



MALACAÑAN PALACE
MANILA

BY THE PRESIDENT OF THE PHILIPPINES

MEMORANDUM ORDER NO. 47

APPROVING THE 2026 STRATEGIC INVESTMENT PRIORITY PLAN

WHEREAS, Section 300 of Republic Act (RA) No. 8424 or the "National Internal Revenue Code of 1997," (NIRC) as amended by RA No. 11534 or the "Corporate Recovery and Tax Incentives for Enterprises (CREATE) Act," mandates the Board of Investments (BOI), in consultation with the Fiscal Incentives Review Board (FIRB), Investment Promotion Agencies (IPAs), other government agencies administering tax incentives, and the private sector, to formulate the Strategic Investment Priority Plan (SIPP) to be submitted to the President for approval;

WHEREAS, under Section 292 of the NIRC, as amended, the FIRB or the IPA shall grant the appropriate tax incentives to registered business enterprises (RBEs) only to the extent of their approved registered project or activity under the SIPP;

WHEREAS, the FIRB, through FIRB Resolution No. 015-25 dated 15 December 2025, adopted the proposed SIPP and recommended the same to the BOI for approval of the President;

WHEREAS, the BOI, through Board Resolution No. 10-03 dated 10 April 2026, approved the submission of the proposed SIPP, incorporating the changes from FIRB Resolution No. 015-025;

WHEREAS, the 2026 SIPP is aligned with the policies of the National Government embodied in the *AmBisyon Natin 2040*, *PAGTANAW 2050*, *Trabaho Para sa Bayan Plan*, and the Philippine Development Plan 2023-2028;

WHEREAS, under Section 296 of the NIRC, as amended, the industry of the registered project or activity shall be prioritized according to national industrial strategy specified in the SIPP, and the SIPP shall define the coverage of the tiers and provide the conditions for qualifying the activities;

WHEREAS, under the same Section, Tier I shall include activities that: (i) have high potential for job creation; (ii) take place in sectors with market failures resulting in underprovision of basic goods and services; (iii) generate value creation through innovation, upgrading or moving up the value chain; (iv) provide essential support for sectors that are critical to industrial development; or (v) are emerging owing to potential comparative advantage;

WHEREAS, under the same Section, Tier II shall include activities that produce supplies, parts and components, and intermediate services that are not locally produced but are critical to industrial development and import-substituting activities, including crude oil refining;

THE PRESIDENT OF THE PHILIPPINES

WHEREAS, under the same Section, Tier III shall include activities that: (i) involve research and development resulting in demonstrably significant value-added, higher productivity, improved efficiency, breakthroughs in science and health, and high-paying jobs; (ii) generate new knowledge and intellectual property registered and/or licensed in the Philippines; (iii) involve commercialization of patents, industrial designs, copyrights and utility models owned or co-owned by an RBE; (iv) involve highly technical manufacturing; or (v) are critical to the structural transformation of the economy and require substantial catch-up efforts, including, but not limited to cyber-security, artificial intelligence, and data-center facilities; and

WHEREAS, the BOI formulated the 2026 SIPP in consultation with FIRB, IPAs, other government agencies administering tax incentives, and the private sector;

NOW, THEREFORE, I, FERDINAND R. MARCOS, JR., President of the Philippines, upon the recommendation of the BOI, by virtue of the powers vested in me by the Constitution and existing laws, do hereby **APPROVE** the attached 2026 SIPP, subject to relevant laws, rules and regulations.

Upon effectivity of the 2026 SIPP, all concerned government agencies are enjoined to issue the necessary regulations to ensure its implementation in a synchronized and integrated manner. No government body shall adopt any policy or take any course of action contrary to, or inconsistent with, the 2026 SIPP and relevant laws.

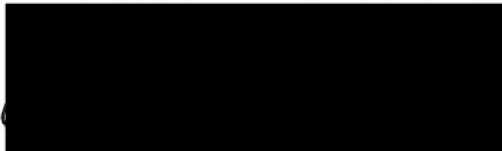
All IPAs shall facilitate and expedite, to the extent possible, the setting up and conduct of registered projects or activities, including assistance in coordinating with the local government units (LGUs) and other government agencies, through the one-stop action center established under Section 310 of the NIRC, as amended.

Further, LGUs and other government agencies shall coordinate with the concerned IPA and comply with RA No. 11032 or the "Ease of Doing Business and Efficient Government Service Delivery Act of 2018," particularly in the processing of permits, licenses, and other requirements.

This Order shall take effect fifteen (15) days after its publication in a newspaper of general circulation or in the Official Gazette, as required under Section 303 of the NIRC, as amended.

DONE, in the City of Manila, this 21st day of May, in the year of Our Lord, Two Thousand and Twenty-Six.

By the President:



RALPH G. RECTO
Acting Executive Secretary



PBBM012874



2026 STRATEGIC INVESTMENT PRIORITY PLAN

PREFERRED ACTIVITIES FOR INVESTMENTS

A. TIER I

1. MODERN BASIC NEEDS

a. Agriculture, Fishery and Forestry

This covers the commercial production of agricultural, fishery, and forestry products.

This also covers the provision of support services and establishment and operation of related facilities and infrastructures.

This also covers growing forests, reforestation, and industrial tree/bamboo plantation in private lands, and other similar activities, whether for carbon credits or not.

b. Manufacturing

i. Processed Agricultural, Fishery, and Forestry Products

This covers processing of agricultural, fishery, and forestry products, including their by-products and wastes.

ii. Pharmaceuticals

This covers the manufacture of pharmaceutical products that are in adequate supply in the Philippines and are not in the Department of Health (DOH) Shortage list and are not new or novel pharmaceutical products as a result of research and development (R&D).

iii. Semiconductors and Electronics

This covers the manufacture, assembly, packaging, testing, and other related services of semiconductors and electronics products, including parts and components.

iv. Machineries and Equipment

This covers the manufacture of machineries and equipment.

v. Shipbuilding

This covers the construction of ships and vessels including the manufacture of its parts and components.

vi. Iron and Steel

This covers the manufacture of iron and steel products such as but not limited to reinforcing bars, angle bars, and wire ropes.

vii. Cement

Cement projects that will qualify for registration with full incentives must at least start from clinker production. Projects with no clinkering facility may qualify for registration provided entitlement to the ITH is limited to two (2) years only.

viii. Value Adding Manufacturing Activities

This covers the manufacture of goods into semi-finished goods/intermediate goods, or finished products that will meet the value-adding criterion to be determined in the guidelines.

c. Halal, Kosher, and Organic Related Activities

This covers the production and manufacture of agriculture and fisheries products that are Halal, Kosher or Organic certified.

This also covers the establishment and operation of facilities that will certify product conformity based on accepted Halal, Kosher, or Organic standard, where applicable.

d. Services

i. Creative Industries/Knowledge Based Industries

This covers Information Technology and Business Process Management (IT-BPM) activities catering to the domestic market, including modern voice services using omni-channel delivery, and back-office operations and other non-voice business processing operations.

This also covers IT-enabled services such as Hyperscalers, Game Development, Animation Development, Motion Picture Production, Software Development, including Software as a Service (SaaS), Development of Learning Management Systems, and Engineering Design.

ii. Ship Repair

This covers repair of all types of vessels.

iii. Maintenance, Repair, and Overhaul (MRO) of Aircraft

This covers the MRO of all types of aircraft and their parts and components.

iv. State-of-the-art Engineering, Procurement, and Construction

This covers the provision of state-of-the-art engineering, design, procurement, and construction services for infrastructure and industrial plants.

e. Healthcare and Disaster Risk Reduction Management Services

This covers the establishment and operation of general hospitals, and other medical/healthcare facilities including drug rehabilitation, quarantine and evacuation centers.

This also covers mobile healthcare services.

f. Infrastructure and Logistics

i. Telecommunications

a) Infrastructure

This covers the establishment and operation of upstream infrastructure and supporting facilities for telecommunications services. Upstream infrastructure includes core network, backhaul, towers, base stations, data centers and other facilities that support international connectivity and the national backbone that connects local/regional networks.

b) Services

This covers the establishment and operation of connectivity facilities for fixed and mobile broadband services¹.

ii. Housing

This covers the development of housing units based on a price ceiling of PHP3.6 million.

iii. Ports and Terminals

This covers the establishment and operations of airports, seaports and integrated terminal exchanges.

iv. Air, Water, and Land Transport

a) Air Transport

This covers the operation of passenger and/or cargo air transport for commercial purposes.

b) Water Transport

This covers the operation of brand new passenger and/or cargo water transport for commercial purposes, e.g., passenger, pure cargo, passenger-cargo vessel, Roll-on, Roll-off (RORO), Roll-off Passenger Ship (ROPax), and overseas shipping.

Operation of vessels procured through pure lease or bareboat charter may also be qualified.

c) Public Land Transport

This covers the operation of passenger land transport fleets using brand new Alternative Fuel Vehicles.

¹ Fixed broadband services include the delivery of broadband services through wired, wireless, satellite, and other technological methods. Wired services include cable wire, fiber optics, submarine cables, or other similar means. Wireless services include the reception of broadband services by mobile phones, personal computers, modems and access points, vehicular communications/electronic boxes, and other nomadic/portable/mobile devices.

v. LNG Storage and Regasification Facility

This covers the establishment and operation of natural gas storage and regasification facilities.

vi. Pipeline for Oil and Gas

This covers the establishment of new pipeline facility for transport of petroleum products and natural gas, petrochemical and similar products.

vii. Training/Learning Facilities, including branch campuses under the Transnational Higher Education Act

This covers the establishment and operation of training and learning facilities, specializing in developing skills in technical, vocational education and training in support of the activities listed in this SIPP.

This also covers the establishment of branch campuses² as defined under Republic Act (R.A.) No. 11448 or Transnational Higher Education Act.

viii. Testing Laboratories/Facilities

This covers the establishment and operation of laboratories/facilities that will test the quality and standards of industrial and commercial products.

ix. Domestic Industrial Zones

This covers the development and operation of domestic industrial zones.

This also covers the establishment and operation of food hubs.³

x. Fulfillment Centers

This covers integrated logistics services which must involve warehousing/ storage, digital inventory management, product packaging, digital order processing, kitting, packing, and last mile shipping services.

xi. Education City

This covers the development/establishment and operation of education facilities in contiguous areas with provision for buildings, digital/ telecommunication systems, collaboration areas and cultural/multi-purpose spaces, and resources integrated with the provision of auxiliary services pursuant to R.A. No. 11448 (or the Transnational Higher Education Act).

g. Energy

i. Exploration and/or Development of Energy Sources

² Section 3(f) of the Transnational Higher Education Act (R.A. No. 11448) defines "branch campus" as follows: "(f) Branch campus also known as a local branch or a satellite campus, refers to a campus of a higher education institution (HEI) of another country established in the Philippines to offer its own educational programs and to impose qualification requirements, regardless of the students' origin."

³ Food hubs are industrial zones that can host state-of-the-art food storage warehouses, cold storage facilities, processing units, and logistic infrastructures.

This covers the exploration and/or development of energy sources (e.g., natural gas) excluding coal mining/extraction.

ii. Power Generation Projects

This covers power generation projects utilizing conventional fuels (i.e., coal, and natural gas), waste heat and other wastes, excluding petroleum unless otherwise determined by the BOI as endorsed by the DOE.

iii. Energy Storage System

This covers the establishment and operation of energy storage systems.

2. SUSTAINABILITY-DRIVEN INDUSTRIES

a. Industrial and/or Hazardous Waste Treatment

This covers the establishment and operation of treatment facilities for toxic and/or hazardous wastes (THW) from industrial or hospital operation.

b. Bulk Water Treatment and Supply

This covers the establishment and operation of bulk water treatment and supply facility, which may involve any of the following:

- Supply of bulk water;
- Water Treatment; or
- Distribution of potable water.

This also covers the establishment and operation of commercial/industrial level rainwater harvesting systems.

c. Wastewater Treatment

This covers the establishment and operation of wastewater treatment facilities.

d. Environment or Climate Change Related Projects

This covers the manufacture/assembly of goods where either the production or the utilization of such goods would significantly lead to either the efficient use of energy, natural resources or raw materials; minimize/prevent pollution; or reduce greenhouse gas emissions.

This also covers green ship recycling based on international standards; the establishment of privately-owned materials recovery facility; carbon capture utilization and storage projects; green transition-related projects for micro, small, and medium enterprises (MSMEs); manufacture of goods using waste products.

This also covers Extended Producer Responsibilities (EPR) activities pursuant to R.A. No. 11898 (or the Extended Producer Responsibility Act of 2022).

This likewise covers activities where the production or utilization of either goods or services would facilitate the adoption of circular economy, and sustainable consumption and production. This may include green technologies and prototypes, web- or mobile-based applications infrastructure, facilities, and equipment.

B. TIER II

1. DEFENSE RELATED SERVICE ACTIVITIES

This covers defense related service activities as endorsed by the Department of National Defense.

2. INDUSTRIAL VALUE CHAIN GAPS

a. IC Design

This covers all logic and circuit design techniques required to design ICs.

b. Desalination Plant

This covers the establishment and operation of a desalination plant.

c. Supply/Value Chain Resiliency

i. Iron and Steel

This covers the manufacture of iron and steel products not locally produced or are import substituting such as billets, wire rods, cold rolled coil, hot rolled coil, steel plates, rails, and sections.

This also covers (a) integrated steel projects starting from the processing of iron ore, slabs, or billets, or (b) production of metal plates, rods, pellets, bars, etc. as a result of ship recycling.

ii. Crude Oil Refining

This covers the refining of crude oil.

iii. Import Substituting Activities

This covers import substituting activities that are critical to industrial development.

d. Sustainability-Related Activities

i. Electric Vehicles (EV), Parts and Components

This covers the manufacture of electric vehicles, including its parts and components.

ii. EV infrastructure

This covers the establishment of charging/refueling stations for alternative energy vehicles except LPG-run vehicles.

iii. Modern Public Land Transport

This covers the operation of public land transport fleets utilizing locally-produced Alternative Fuel Vehicles.

iv. Energy Efficient Vessels and Aircraft

This covers the manufacture of energy efficient vessels and aircraft.

v. Sustainable Aviation Fuel (SAF)

This covers the production of SAF utilizing locally-available feedstocks.

vi. Strategic and Critical Minerals and Green Metals

This covers the processing of strategic and critical minerals into higher value mineral products used in the global transition to clean energy.

This also covers recovery and recycling including remining of tailings and novel sources such as but not limited to geothermal brines, e-wastes, metal scraps, slags, etc.

vii. Bioplastics and Biopolymers

This covers the processing of locally-available feedstocks to produce bioplastics and biopolymers, in compliance with the relevant local or international product standards.

viii. Integrated Waste Management, Disposal, and Recycling

This covers the operation of waste management solutions (collection, sorting, treatment, transportation) integrated with waste disposal and recycling.

ix. Renewable Energy

This covers developers of renewable energy facilities, including hybrid systems.

e. Health Related Activities

This covers health related activities such as manufacturing in support of the Vaccine Self-Reliance Program or other related programs as endorsed by the DOH, Department of Science and Technology (DOST), or other similar agencies; medicines and pharmaceutical products in the DOH shortage list; herbal medicines, active pharmaceutical ingredients (API); and specialty hospitals/facilities.

3. FOOD SECURITY RELATED ACTIVITIES

This covers products and services critical to competitively ensure food security or in support of green/organic agriculture, such as but not limited to integrated food production and processing activities (e.g., dairy); production of hybrid seeds contained in the National Seed Industry Council (NSIC) Crop Variety Registration and adoption thereof; production of improved animal breeds/genetic stocks with farms accredited by the Department of Agriculture - Bureau of Animal Industry and adoption thereof; manufacture of animal vaccine, and pesticides and fertilizers.

This also includes the adoption of smart and precision agriculture technologies.

C. TIER III

1. SCIENCE, TECHNOLOGY, AND INNOVATION⁴-RELATED ACTIVITIES

a. Research and Development

This covers Research and Development (R&D) activities, including plasma R&D applications in medicine, environmental remediation, power production, industrial coating materials, among others; nuclear science activities for material science applications to create high-value solutions for defense, communication, energy, medical, and industrial applications; development of materiel⁵; drug discovery and development; genetic resources utilization from natural resources, among others.

This also covers clinical trials on emerging or novel pharmaceutical products.

b. Commercialization of Patents, Industrial Designs, Copyrights, and Utility Models

This covers the commercialization of uncommercialized intellectual properties such as patents, industrial designs, copyrights, and utility models.

c. Aerospace

This covers the manufacture of aerospace products, parts and components.

d. Wafer Fabrication

This covers the establishment and operation of a wafer fabrication facility.

e. Defense Related Manufacturing Activities

This covers defense related manufacturing activities as endorsed by the Department of National Defense.

f. Hydrogen Energy

This covers pre-development, establishment, construction, operation, maintenance, decommissioning and disposal of Hydrogen facilities for production, storage, transmission, distribution, and utilization of Hydrogen/fuel cells energy resource for power or non-power applications.

g. Nuclear Energy

This covers nuclear power generation projects.

h. Cybersecurity

This covers cybersecurity such as but not limited to development of cybersecurity solutions for real-time threat mitigation, protection of critical infrastructure,

⁴ Section 3(f) of the Philippine Innovation Act (RA No. 11293) defines "innovation" as "the creation of new ideas that results in the development of new or improved policies, products, processes, or services which are then spread or transferred across the market."

⁵ Section 3(g) of the Self-Reliant Defense Posture Revitalization Act (R.A. No. 12024) defines "Materiel" as referring to military technology, weapon systems, arms, ammunition, combat clothing, armor, vehicles, and other similar military equipment, and materials

advancement of encryption technologies for secure digital transactions, and the development of robust cyber resilience strategies.

i. Artificial Intelligence and Data Science

This covers activities developing solutions, and/or providing services related to data science and artificial intelligence technologies with subfields: Machine Learning (ML), Deep Learning; Natural Language Processing (NLP); Computer Vision; Robotics, and other emerging related fields.

j. Quantum Technologies

This covers activities that will develop innovations related to quantum computing.

k. Activities Adopting Industry 4.0 and 5.0 Technologies

This covers activities adopting Industry 4.0 and 5.0 technologies.

Activities adopting Industry 4.0 and 5.0 technologies focus on integrating advanced digital solutions to enhance automation, efficiency, and human-machine collaboration across various industries. Key initiatives include the deployment of intelligent sensor networks, AI-driven predictive maintenance, and industrial Internet of Things (IoT) for real-time monitoring and optimization of manufacturing processes. This also includes the adoption of cyber-physical systems, robotics, and digital twins. Industry 5.0 expands on these advancements by emphasizing human-centric innovation, sustainable manufacturing, and AI-assisted collaboration between humans and machines.

l. Geospatial Analysis Research Hub

This covers activities employing geospatial science to address pressing concerns such as disaster risk reduction, urban planning, and environmental management through integration of advanced technologies like remote sensing, GIS, and big data analytics to provide precise and actionable geospatial information.

m. Additive Manufacturing Technologies

This covers the use of additive manufacturing as a tool for applications in manufacturing, medicine, construction, and consumer goods.

n. Modern Biotechnology

This covers activities utilizing modern biotechnology in various applications such as in agriculture, manufacturing, health/health services, energy, etc.

Modern Biotechnology refers to the application of: (1) in vitro nucleic acid techniques, including recombinant deoxyribonucleic acid (DNA) or direct injection of nucleic acid into cells or organelles; or (2) fusion of cells beyond the taxonomic family, that overcome natural physiological reproductive or recombination barriers and that are not techniques used in traditional breeding or selection.⁶

⁶ Source: DOST-DA-DENR-DOH-DILG Joint Department Circular no. 1 (s. 2021)

o. Production and/or Adoption of New Hybrid Seeds

This covers the production and/or adoption of newly researched and developed hybrid seeds that are not yet listed in the NSIC's Crop Variety Registration.

p. Innovative Products and Services

This covers the manufacture or provision of innovative products or services.

2. SCIENCE, TECHNOLOGY, AND INNOVATION⁷ SUPPORT FACILITIES

This also covers establishment of innovation support facilities such as but not limited to establishment, upgrading and/or development of research laboratories and facilities of research institutions; data center facilities with embedded power source or its own power supply that does not rely on transmission from the grid or a power cooperative⁸; R&D hubs; centers of excellence; science & technology parks; innovation and/or incubation center; science centrum; tech startups, startup enablers: incubators & accelerators; and space-related infrastructures.

EXPORT ACTIVITIES

Export activities are under Tier I unless complying with Tier II or Tier III qualification requirements.

1. Production and Manufacture of Export Products

This covers the production/manufacture of export products and with export requirement of at least 70% of its output.

2. Services Exports

This covers service activities rendered to clients abroad and paid for in foreign currency with an export requirement of at least 70%.

This also covers IT-BPM activities such as modern voice services using omni-channel delivery, and back-office operations and other non-voice business processing operations.

3. Activities in Support of Exporters

This covers activities directly supporting export producers as follows:

- a. Manufacture of parts/components and materials and supplies directly/reasonably needed in the production of the export product;
- b. Services rendered to II.1 and II.2 above;
- c. Product testing and inspection;
- d. Repair and maintenance;
- e. Integrated logistics services;
- f. Development and Operation of Economic Zones (ecozones) and industrial parks and Buildings for Exporters; and

⁷ Section 3(f) of the Philippine Innovation Act (R.A. No. 11293) defines "innovation" as "the creation of new ideas that results in the development of new or improved policies, products, processes, or services which are then spread or transferred across the market."

⁸ Data Center is defined as a purpose-built commercial facility—either dedicated or multi-tenant—that houses servers, storage, and networking equipment, supported by mission-critical systems like power, cooling, and connectivity. It provides secure, reliable, and scalable infrastructure services, such as colocation and connectivity solutions, to businesses and organizations for their IT needs.

- g. Provision of telecommunications, sewerage, waste management, water, and power support to ecozones.

SPECIAL LAWS

Except for projects under R.A. No. 9513 and R.A. No. 12024, activities under Special Laws are under Tier I unless complying with Tier II or Tier III qualification requirements.

1. APPLICABLE TO ALL IPAs

- a. Publication or Printing of Books/Textbooks (R.A. No. 8047)
- b. Rehabilitation, Self-Development, and Self-Reliance of Persons with Disability (R.A. No. 7277)
- c. Tourism (R.A. No. 9593)
- d. PPP Infrastructure or Development Projects and Services (R.A. No. 11966 or the PPP Code of the Philippines)
- e. Production of Salt (R.A. No. 11985)
- f. Production, Manufacturing, Assembly, Servicing, Operation of Materiel⁹ (R.A. No. 12024) (Services Activities under Tier II and Manufacturing Activities under Tier III)

2. APPLICABLE TO BOI ONLY

- a. Industrial Tree Plantation (P.D. No. 705)
- b. Exploration, Mining, Quarrying, and Processing of Minerals (R.A. No. 7942)¹⁰
- c. Refining, Storage, Marketing, and Distribution of Petroleum Products (R.A. No. 8479)
- d. Renewable Energy (R.A. No. 9513)
- e. Energy Efficiency and Conservation (R.A. No. 11285)

AREA/REGION-SPECIFIC PRIORITY ACTIVITIES

Area/Region-Specific Priority activities are under Tier I unless complying with Tier II or Tier III qualification requirements.

1. BANGSAMORO AUTONOMOUS REGION IN MUSLIM MINDANAO (BARMM)¹¹

a. Halal Tourism

This covers the establishment of tourism-related facilities and attractions; tourism related services; hotels catering to BARMM tourists; Halal-based tourism or Halal-Certified accommodations, resorts, and attractions.

b. Investment Operations under R.A. No. 11439 (An Act Providing for the Regulation and Organization of Islamic Banks)

Investment operations carried out by Islamic Bank through Shari'ah-compliant arrangements, contracts and structures [e.g., mudarabah partnership, construction and manufacture (istisna'a) arrangements] in the priority areas listed under the SIPP, including its area/region specific priority activities, pursuant to R.A. No. 11439.

----- Nothing Follows -----

⁹ Section 3(g) of the Self-Reliant Defense Posture Revitalization Act (R.A. No. 12024) defines "Materiel" as referring to military technology, weapon systems, arms, ammunition, combat clothing, armor, vehicles, and other similar military equipment, and materials

¹⁰ Excluding extraction activities.

¹¹ Contains suggestions from both the Bangsamoro Board of Investments and Bangsamoro Economic Zone Authority.