

Title: Director of Forestry et al., v. Hon. Emmanuel M. Munoz et al., and Pinagcamaligan Indo-Agro Development Corporation, Inc.

Facts:

Pinagcamaligan Indo-Agro Development Corporation, Inc. (Piadeco), alleged to own 72,000 hectares of land based on Titulo de Propiedad No. 4136 issued in 1894, engaged in logging operations on its claimed property. Piadeco's Certificate of Private Woodland Registration No. PWR 2065-New issued by the Bureau of Forestry was set to expire on December 31, 1964. However, the Director of Forestry canceled this certificate on April 11, 1964, following Piadeco's unauthorized cutting of trees within the Angat and Marikina Watershed Reservations, areas excluded from the certificate.

Piadeco filed a petition in the Court of First Instance (CFI) of Bulacan against the government officials, who in turn filed a motion to dismiss for lack of jurisdiction and exhaustion of administrative remedies. The CFI granted a preliminary injunction in Piadeco's favor but later dissolved it. Piadeco continued operations even after their registration certificate expired, leading to the impounding of logs by the Armed Forces upon Presidential directive to halt illegal logging. Piadeco then sought to execute the dissolved CFI injunction, which led to the present petitions.

Issues:

1. Whether Piadeco's Spanish title (Titulo de Propiedad No. 4136) is registrable with the Bureau of Forestry.
2. Whether Piadeco may continue logging operations on the basis of the expired registration certificate No. PWR 2065-New.
3. Whether the cancellation of Piadeco's registration certificate by the Director of Forestry was valid.
4. Whether the CFI judgment reinstating Piadeco's registration certificate and making the injunction permanent could still be executed after the certificate's expiration.
5. Whether Piadeco is entitled to the removal of logs cut before the expiration of the certificate.

Court's Decision:

The Supreme Court ruled that Piadeco's title was not among those registrable under the applicable forestry administrative order, and as such, the land in question is considered public forest land. Piadeco's expired and canceled registration certificate does not entitle it to continue logging operations or to haul logs cut before its expiration. The CFI judgment

was deemed *functus officio* because the certificate expired, making execution of the judgment null and void. Piadeco's logging operations were considered unlawful, and the government seizure of the impounded logs was authorized. Piadeco's petitions were denied and ruled against in all presented legal issues.

**Doctrine:**

The validity of a Spanish title over land must be conclusively proven in appropriate land registration proceedings. Only certain titles specified by the Bureau of Forestry are registrable, and such registration provides exemption from the payment of forest charges. The presumption is that land belongs to the State unless proven otherwise, and the preservation and conservation of public forests are within the State's police power in the interest of general welfare.

**Historical Background:**

The case falls within the era of rapid industrialization and development in the Philippines, a period of increased logging activities potentially detrimental to the environment. The government, through the Bureau of Forestry and courts, affirmed its commitment to sustainable utilization of forest resources and resolved controversies involving claims of land ownership based on colonial titles in light of contemporary laws and regulations. This case demonstrates the tension between development and conservation during this critical juncture in Philippine history.