

Title: Aldaba v. Commission on Elections, G.R. No. 188078 (2010)

Facts: Victorino B. Aldaba, Carlo Jolette S. Fajardo, Julio G. Morada, and Minerva Aldaba Morada were petitioners challenging the constitutionality of Republic Act No. 9591 (RA 9591), an act creating a separate congressional district for Malolos City. They argued that Malolos City's population did not meet the constitutional requirement of at least 250,000 inhabitants for the creation of a legislative district. In response, the Commission on Elections (COMELEC) invoked the use of a population projection by Alberto N. Miranda, Region III Director of the National Statistics Office (NSO), anticipating that by 2010, the population of Malolos City would reach 254,030. The Philippine Supreme Court ruled against the COMELEC on 25 January 2010, declaring RA 9591 unconstitutional. Thereafter, the COMELEC sought reconsideration, asserting that the issue was non-justiciable and highlighting other sources of population data.

Procedurally, the case escalated to the Supreme Court after the original decision from the Court favored the petitioners. The COMELEC filed a motion for reconsideration, presenting alleged alternative population indicators. The Court dismissed the supplemental motion for reconsideration, reinforcing its original decision and explicitly addressing each point raised by the COMELEC and other entities.

Issues:

1. Is the issue of population size required for the creation of a legislative district a justiciable question?
2. Do the population indicators used by Congress adhere to the constitutional requirements and the standards set by Executive Order No. 135?

Court's Decision:

1. The Supreme Court reiterated that the question of population size is justiciable. It upheld its power to review the constitutionality of laws creating legislative districts, including whether they adhere to specific constitutional limitations.
2. The Court found the population indicators relied upon by Congress, including Miranda's Certification and alternative sources, to be neither authoritative nor reliable within the framework of Executive Order No. 135 and therefore inadequate for establishing compliance with the constitutional threshold.

Doctrine:

- The constitutionality of apportionment laws, including the reliance on population figures

for the creation of legislative districts, is a justiciable question.

- Compliance with the constitutional requirement for creating a legislative district cannot be based on non-authoritative sources or projections of population growth but must be demonstrated through official data that meets prescribed standards, such as those outlined in Executive Order No. 135.

Class Notes:

- In creating a legislative district, a city must have a population of at least 250,000 (“Section 5(3), Article VI of the 1987 Constitution”).

- The constitutionality of legislative apportionment is subject to judicial review.

- Population data for legal purposes should come from authoritative sources and comply with officially recognized statistical standards.

- Executive Order No. 135 sets standards for population data and certifications which are relevant for judicial review processes.

Historical Background:

The case demonstrates an ongoing effort to ensure that legislative districts reflect the principle of equal representation. It arose in the context of increasing urbanization and population growth within cities in the Philippines, such as Malolos City. As the country’s cities evolve, it becomes imperative that the creation of legislative districts adheres to constitutional requirements to preserve democratic representation. The decision highlights the interplay between statistical accuracy, legislative action, and judicial scrutiny to uphold constitutional mandates.