

Title: **Kilusang Mayo Uno vs. The Director-General, National Economic Development Authority**

Facts:

This case arises from two consolidated petitions challenging the constitutionality of Executive Order No. 420 (EO 420), issued by President Gloria Macapagal-Arroyo on April 13, 2005. EO 420 mandated the streamlining and harmonization of identification (ID) systems across all government agencies and government-owned and controlled corporations (GOCCs). It aimed to reduce costs, ensure greater convenience for public transactions, facilitate private businesses, enhance the integrity and reliability of government-issued IDs, and facilitate access to and delivery of government services.

Petitioners, including various representative groups and individuals, filed petitions for certiorari, prohibition, and mandamus under Rule 65 of the Rules of Court, asserting that EO 420 was unconstitutional for two primary reasons: it was an usurpation of legislative functions by the executive branch and it infringed upon the citizen's right to privacy. The government, represented by the respondents, defended the EO on the grounds of promoting efficiency and convenience in the public service.

The cases were elevated to the Supreme Court, which consolidated the petitions and took cognizance of the issues raised, given their paramount public concern and the potential impact on constitutional rights.

Issues:

1. Whether EO 420 constituted usurpation of legislative power by the President.
2. Whether EO 420 infringed upon the citizens' right to privacy.

Court's Decision:

The Supreme Court dismissed the petitions, declaring EO 420 valid for the following reasons:

1. **Usurpation of Legislative Power:**

The Court ruled that EO 420 did not constitute a usurpation of legislative power. It applied only to government entities that were already issuing ID cards under existing laws. The President's directive aimed to unify the data collection and format for these IDs, which fell within the President's constitutional powers of control over the executive branch and duty to ensure the laws' faithful execution. The Court found that EO 420 was a mere executive action, not a legislative act, as it did not enact, alter, or repeal any law.

2. **\*\*Infringement of the Right to Privacy:\*\***

The Court also held that EO 420 did not infringe upon the right to privacy. It pointed out that the limited and specified data collection mandated by EO 420 were typical for personal identification and less than what was collected under the disparate systems prior to EO 420. Furthermore, EO 420 instituted safeguards to protect the confidentiality of collected data, thus upholding the individuals' right to privacy.

Doctrine:

The ruling established or reiterated the following doctrines:

1. The President's constitutional power of control over the executive branch includes the authority to issue executive orders directing government entities to adopt uniform ID data collection and format.
2. The implementation of a unified but less intrusive ID system by the executive, complete with safeguards for data confidentiality, does not violate the constitutional right to privacy.

Class Notes:

1. Constitutional Basis for the President's Executive Orders: The power of the President to issue executive orders is rooted in their constitutional control over the executive branch and the duty to ensure the faithful execution of laws.
2. Distinction between Executive and Legislative Actions: Executive actions that implement or execute existing laws do not constitute usurpation of legislative power, provided they do not enact, alter, or repeal laws.
3. Right to Privacy vis-à-vis Government ID Systems: The state can implement ID systems that involve the collection and storage of personal data, provided such systems are necessary for public service, collect data within reason, and have adequate safeguards to ensure data confidentiality and privacy.

Historical Context:

EO 420 was issued amid concerns regarding the efficiency and reliability of the Philippines' multiple ID systems across various government entities. It aimed to streamline these systems to reduce redundancy, lower costs, and improve public service delivery, reflecting the administration's thrust towards good governance through administrative reform and technology utilization.