

Title: Doehle-Philman Manning Agency Inc., et al. vs. Henry C. Haro

Facts:

Henry C. Haro was employed by Doehle-Philman Manning Agency, Inc., on behalf of its foreign principal, Dohle (IOM) Limited, as an oiler aboard MV CMA CGM Providencia on May 30, 2008, for a nine-month period, with a salary and benefits package. After passing a pre-employment medical examination (PEME), Haro reported experiencing health issues in November 2008 while performing his duties, leading to his repatriation and subsequent medical consultations in the Philippines.

Haro filed a complaint for disability benefits, among other claims, against the petitioners on June 19, 2009. His claim was based on the assertion that his illness was contracted while performing his duties. The petitioners countered, citing the company-designated physician's diagnosis that Haro's condition was not work-related.

The Labor Arbiter (LA) dismissed Haro's complaint, a decision which was affirmed by the National Labor Relations Commission (NLRC) upon appeal. However, upon elevating the matter to the Court of Appeals (CA), the earlier decisions were reversed, and the petitioners were ordered to pay Haro disability benefits and attorney's fees. The petitioners' motion for reconsideration was denied, prompting them to escalate the matter to the Supreme Court.

Issues:

1. Whether the CA erred in reversing the NLRC's decision and finding for Haro based on his inability to work for more than 120 days.
2. Whether Haro's medical condition can be considered work-related, and thus entitling him to disability benefits.

Court's Decision:

The Supreme Court granted the petition, reversing the CA's decision and upholding the NLRC's resolution. The Court stressed that for a disability to be compensable under the POEA-SEC, it must be proven to be work-related, occurring during the employment period. Haro failed to demonstrate the necessary link between his condition and his work environment. The Court also emphasized that the PEME's fitness declaration does not guarantee that any subsequent illness is work-related.

Doctrine:

The Supreme Court reiterated that for a seafarer's medical condition to be compensable, there must be substantial evidence that either the condition itself is directly attributable to

the seafarer's work or that the seafarer's working conditions significantly increased the risk of contracting the condition.

Class Notes:

- ****Burden of Proof:**** The seafarer must substantiate that their illness or injury is work-related to qualify for disability benefits.
- ****PEME:**** Being declared fit to work in a PEME does not absolve an employer from compensability claims, but the seafarer still needs to prove that the ailment occurred due to work conditions.
- ****Medical Condition Work-Relatedness:**** A medical condition must be proven to be work-related explicitly, or that the work conditions heightened the risk for such a condition, for it to be compensable.
- ****POEA-SEC:**** Under Section 20 (B), for an injury or illness to be compensable, it must be work-related and have occurred during the term of the employment contract.

Historical Background:

This case underscores the complexities in determining compensability of illness or injury claims under Philippine maritime law, particularly in establishing a clear link between one's employment conditions and their medical condition. It reflects the judiciary's delicate balancing act in safeguarding the rights of seafarers while ensuring that employers are not unduly burdened with claims not directly attributable to work conditions.