

Title

****Southeast Asian Fisheries Development Center vs. NLRC and Acosta et al**** *(G.R. No. 86773, 206 SCRA 283, 1992)*

Facts

1. ****Termination and Initial Complaint:****

- Private respondents (Corazon Canto, Dan Baliao, Elizabeth Supetran, Carmelita Ferrer, Cathryn Contrador, and Doric Veloso) were employed by the petitioner, Southeast Asian Fisheries Development Center (SEAFDEC).
- They filed two labor cases, docketed as RAB Case No. VI-0156-86 and RAB Case No. VI-0214-86, before the National Labor Relations Commission (NLRC), Regional Arbitration Branch in Iloilo City, claiming wrongful termination.

2. ****Motion to Dismiss:****

- On August 22, 1990, SEAFDEC, represented by Dr. Flor J. Lacanilao, filed a Motion to Dismiss, arguing that SEAFDEC, being an international intergovernmental organization, is beyond the jurisdiction of the NLRC.

3. ****Denial by Labor Arbiter:****

- On September 20, 1990, the Labor Arbiter denied the Motion to Dismiss. SEAFDEC's subsequent Motion for Reconsideration was also denied on January 7, 1991.

4. ****Petition for Certiorari:****

- SEAFDEC filed a petition for certiorari with the Supreme Court, arguing that the NLRC has no jurisdiction over the dispute due to SEAFDEC's immunity from local suits.
- The Supreme Court issued a temporary restraining order on March 20, 1991.

5. ****Solicitor General's Position:****

- The Solicitor General filed a Manifestation and Motion, which was granted by the Court, excusing him from filing a comment as he disagreed with the Labor Arbiter's position.

6. ****Supreme Court's Initial Resolution:****

- On March 30, 1992, the Supreme Court dismissed the petition, stating that the petitioner failed to prove that the Labor Arbiter acted with grave abuse of discretion. The temporary restraining order was lifted.

7. ****Motion for Reconsideration:****

- SEAFDEC moved for reconsideration, reiterating the Labor Arbiter's lack of jurisdiction

due to SEAFDEC's immunity.

Issues

1. **Whether SEAFDEC, as an international organization, is immune from suit and hence beyond the jurisdiction of NLRC.**
2. **Whether SEAFDEC waived its immunity by failing to raise the issue of jurisdiction early in the proceedings.**

Court's Decision

1. Immunity from Suit:

The Supreme Court focused on SEAFDEC's argument that as an international organization, it enjoys immunity from local jurisdiction. The Court cited its previous ruling in *SEAFDEC-Aquaculture Department vs. NLRC* (G.R. No. 86773) and *Lacanilao vs. De Leon* (G.R. No. 76532) affirming SEAFDEC's diplomatic immunity:

- SEAFDEC is established by multiple Southeast Asian countries, including the Philippines.
- The Philippines became a signatory to the Agreement establishing SEAFDEC and formally established its Aquaculture Department in Iloilo for promoting research in aquaculture.
- The SEAFDEC Council, of which the Philippines is a part, holds supreme power over the organization.
- SEAFDEC operates autonomously and is beyond the control of any single state.
- Specifically, SEAFDEC is immune from local legal processes to maintain its impartiality and prevent local interference in its operations.

2. Waiver of Immunity:

The Court ruled that SEAFDEC did not waive its immunity despite raising the jurisdiction issue only after the initial stages of the litigation. The petitioner raised the immunity defense before resting its case and prior to the final conclusion of the labor proceedings:

- Waiver of immunity must be clear and unequivocal; the timing in this case did not signify a waiver.

Final Ruling:

The Supreme Court reconsidered its initial order dismissing the petition and ruled in favor of SEAFDEC:

- The petition was granted, and the order dated September 20, 1990, from the Labor Arbiter was set aside.
- The respondent Labor Arbiter was enjoined from further proceedings on RAB Case No.

VI-0156-86 and RAB Case No. VI-0214-86.

Doctrine

****Diplomatic Immunity:**** International organizations like SEAFDEC, recognized by multiple nations and operating beyond the control of any single state, are immune from local jurisdiction and legal processes. This immunity ensures operational impartiality and efficiency, free from local influence.

Class Notes

- ****Diplomatic Immunity:**** This case reaffirms that international organizations with a distinct juridical personality, as established by their founding agreements among multiple states, enjoy immunity from local jurisdiction, preserving their autonomy and impartiality.
- ****Jurisdiction:**** Jurisdictional immunity must be raised before the case concludes to avoid waiving such immunity.
- ****Precedents:**** Reference cases SEAFDEC-AQD vs. NLRC (G.R. No. 86773) and Lacanilao vs. De Leon (G.R. No. 76532) for further reading on diplomatic immunity.

****Key Elements:****

- ****International Organization:**** Defined as an entity established by an agreement among various states for specific economic, social, or other non-political purposes.
- ****Autonomy:**** Such organizations operate independently and are not subject to the control of any one state.
- ****Immunity from Suit:**** They are immune from the legal writs and processes issued by the courts of the host country.
- ****Waiver of Immunity:**** Immunity must be asserted at the earliest convenience during litigation; however, initial delays in raising it do not constitute an implied waiver if raised before case conclusion.

Historical Background

This case emerged within the context of growing international cooperation in regional development. The Southeast Asian Fisheries Development Center was established through a collaborative agreement among Southeast Asian nations, including the Philippines, to enhance regional fisheries. As international bodies increased, so did questions regarding their legal status and interaction with local jurisdictions. The case underscores the delicate balance between hosting international organizations while respecting their autonomy and operational integrity, especially in the backdrop of the expanding role of such entities in

global economic and social development.