

****Title:****

Nicasio I. Alcantara vs. Commission on the Settlement of Land Problems, et al. (G.R. No. 53159)

****Facts:****

1. In 1993, Nicasio Alcantara was awarded Forest Land Grazing Lease Agreement No. 542 (FLGLA No. 542) by the Department of Environment and Natural Resources (DENR), leasing 923 hectares of public forest land in Sitio Lanton, Barrio Apopong, General Santos City for 25 years, set to expire on December 31, 2018.
2. Prior to the agreement, in 1990, Rolando Paglangan, Esmael Sabel, and Lasid Acop from the B'laan and Maguindanaoan tribes filed a complaint with the Commission on Settlement of Land Problems (COSLAP) against FLGLA No. 542, seeking the land's cancellation and reversion to their tribes. The complaint was docketed as COSLAP Case No. 98-052.
3. Alcantara contested COSLAP's jurisdiction, arguing that only the DENR had authority over grazing lands. Despite this, COSLAP continued proceedings.
4. Alcantara claimed that COSLAP did not inform him of hearings and denied him participation in field interviews and inspections.
5. On August 3, 1998, COSLAP decided to cancel FLGLA No. 542. Alcantara appealed to the Court of Appeals via petition for review.
6. On June 22, 2000, the Court of Appeals upheld the COSLAP decision, and on October 16, 2000, denied Alcantara's motion for reconsideration.
7. The petition to the Supreme Court followed, with Alcantara arguing the invalidity of COSLAP's decision. Alcantara claimed insufficient jurisdiction, asserting that the National Commission on Indigenous Peoples (NCIP) should handle ancestral land claims per the Indigenous People's Rights Act of 1997.
8. Paglangan argued that Alcantara's petition to the Court of Appeals was filed out of time, and COSLAP had proper jurisdiction, especially since the dispute predates the NCIP's creation.
9. On April 6, 2001, the Heirs of Datu Abdul S. Pendatun, Heirs of Sabal Mula, and the Gawan Clan intervened, claiming the disputed land as part of their ancestral domain.

10. The Court of Appeals recognized that the B'laan had historically occupied the land, and that FLGLA No. 542 violated Presidential Decree No. 410, which protects ancestral lands.

****Issues:****

1. Whether the COSLAP had jurisdiction over the ancestral land claim.
2. Whether Alcantara was estopped from denying COSLAP's jurisdiction due to his active participation in the case.
3. Whether the designation of the disputed area under ancestral land status was valid.
4. Application of provisions and statutes relevant to ancestral lands in the context of the case.

****Court's Decision:****

1. ****Jurisdiction of COSLAP:**** The Supreme Court held that COSLAP had jurisdiction as per Executive Order No. 561, covering disputes involving land occupants and leaseholders. COSLAP's jurisdiction was further justified given the critical nature of the dispute.
2. ****Estoppel by Participation:**** Alcantara's active involvement in the COSLAP proceedings (filing answer and motions) estopped him from later questioning COSLAP's jurisdiction. The Supreme Court affirmed the principle that active participation validates jurisdiction unless opposed in due time.
3. ****Status of the Land as Ancestral Domain:**** The Supreme Court concurred with the findings of the Court of Appeals, which identified the B'laan tribe's continuous occupancy and cultivation, satisfying the historical occupation condition. The ruling underlined Presidential Decree No. 410, securing unappropriated agricultural lands as ancestral lands for indigenous groups.

****Doctrine:****

1. ****Jurisdiction by Estoppel:**** Active participation in proceedings without timely opposition constitutes recognition of jurisdiction. (Spouses Virgilio and Josie Jimenez vs. Patricia, Inc.; ABS-CBN Supervisors Employees Union Members vs. ABS-CBN Broadcasting Corp.; Maneja vs. National Labor Relations Commission.)
2. ****Presidential Decree No. 410:**** Affirms ancestral land rights based on continuous and historical occupancy.

****Class Notes:****

- ****Estoppel:**** Active participation in proceedings upholds jurisdiction despite later objections.

- **Ancestral Land Rights:** Covered under P.D. No. 410 and Republic Act No. 8371 (Indigenous People's Rights Act of 1997).
- **Jurisdiction of COSLAP:** Governed by Executive Order No. 561, allowing intervention in land disputes.

Historical Background:

This case reflects the Philippines' legal framework advocating ancestral land rights of indigenous peoples. It adheres to historical contexts where ancestral lands are protected against unauthorized leases and state the importance of recognizing traditional and cultural claims predating modern legislative frameworks.