

****Title:****

Salvador Araneta et al. vs. Hon. Magno S. Gatmaitan et al.

****Facts:****

In 1950, trawl operators from Malabon and Navotas began fishing in San Miguel Bay, a significant fishing area in the Bicol region. Residents and sustenance fishermen claimed trawling depleted marine resources and lobbied to ban it. Following multiple resolutions and petitions, President Magsaysay issued Executive Order No. 22 in April 1954, prohibiting trawling in the bay. This order was amended by Executive Order No. 66 in September 1954, and Executive Order No. 80 in November 1954, which phased out trawling permissions in specific areas by the end of 1954.

Following the issuance of these orders, 18 trawl operators sought judicial relief in the Court of First Instance (CFI) of Manila, requesting an injunction and a declaration that the executive orders were null and void. The CFI temporarily issued a ruling favoring the trawl operators and required the government officials to post a bond of PHP 30,000 to stay the injunction.

The government, represented by the Secretary of Agriculture and Natural Resources and the Director of Fisheries, contested this decision, leading to a series of motions. The Solicitor General filed for reconsideration and new trial motions but was unsuccessful. The government then filed an appeal to the Supreme Court of the Philippines in G.R. No. L-8895 and G.R. No. L-9191.

****Issues:****

1. Whether the President has the authority to issue Executive Orders Nos. 22, 66, and 80 banning trawling in San Miguel Bay.
2. Whether such executive orders constitute an undue delegation of legislative power.
3. Whether the CFI acted within its jurisdiction in requiring government officials to post a bond and issuing an injunction.

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

1. ****Authority of the President:**** The Court held that under the Fisheries Act (Act No. 4003, as amended), particularly Sections 6, 13, and 75, the President's orders were valid. The Act empowers the Secretary of Agriculture to set aside fisheries reservations and regulate fishing methods, including trawling, for conservation purposes. The President, having control over executive departments including the Department of Agriculture and Natural

Resources, validly issued the executive orders.

2. **Delegation of Legislative Power:** The Court found that the Fisheries Act was complete and merely required the executive to issue regulations to execute its provisions. This was an exercise of delegated authority, not an unconstitutional delegation of legislative power. Congress had set clear policies and standards, and the President's orders were consistent with legislative intent.

3. **Jurisdiction and Bond Requirement:** The Supreme Court recognized the procedural posture but declared the issue regarding the bond requirement moot as no writ of preliminary injunction was issued by the Court enjoining the CFI's order. There was no abuse of discretion by the CFI in treating the case as one involving injunction.

Doctrine:

1. **Executive Orders Validity:** The President can issue executive orders regulating fishing activities under statutory authority delegated by Congress.

2. **Delegation of Authority:** Legislation may delegate authority to issue regulations to ensure proper execution of laws, provided the statute is complete and leaves only administrative implementation to the executive.

3. **Justiciability of Executive Orders:** Challenges to executive orders may be heard in courts, and such challenges can be raised through actions for declaratory relief.

Class Notes:

1. **Key Legislation:**

- Fisheries Act (Act No. 4003, as amended by Commonwealth Act No. 471): Defines unlawful fishing activities and authorizes the Secretary of Agriculture to regulate them (Sections 6, 13, 75).

2. **Important Concepts:**

- **Trawl Definition:** A fishing net used to catch bottom-dwelling species by dragging it along the sea floor.

- **Delegation of Power:** Permissible where Congress sets policies and standards and delegates the authority to detail execution to the executive.

- **Executive Control:** The President's supervisory power over executive departments allows the issuance of regulations in line with legislative policies.

3. **Statutory Application:**

- Prohibitions on destructive fishing methods can be implemented through executive orders

under the direction of related executive departments.

- Judicial checks on executive orders ensure they align with statutory and constitutional mandates.

****Historical Background:****

The case occurred during President Ramon Magsaysay's tenure (1953-1957), a period noted for substantial public clamor for effective governance and community welfare. The executive orders were responses to environmental concerns and local fisheries politics in a developing post-war Philippines. The decision reflects the period's heightened appreciation for regulatory governance to preserve natural resources, aligning executive actions with emergent scientific understandings of ecological balance.