

****Title:**** Sta. Rosa Realty Development Corporation vs. Amante, et al.

****Facts:****

The Canlubang Estate in Laguna, owned by the late Jose Yulo, Sr., included two parcels of land measuring 254.766 hectares in Barangay Casile now titled under Sta. Rosa Realty Development Corporation (SRRDC). The property became embroiled in multiple disputes, leading to numerous civil suits and administrative proceedings.

- ****Initial Occupation and Development:****

Residents of Barangay Casile claimed that their ancestors had occupied the land since 1910, building homes and cultivating fruit-bearing trees.

- ****1985 Injunction Case:****

Residents led by Juan B. Amante filed for an injunction and damages against SRRDC, alleging illegal entry, fencing of the area, destruction of property, and deprivation of land possession against the residents.

- ****Court Orders and Appeals:****

The Regional Trial Court (RTC) initially issued a writ of preliminary injunction in favor of the residents, which was later overturned by the Court of Appeals (CA). The RTC ruled in 1992 for the residents to vacate the property, which the CA modified by awarding nominal damages to each resident but upheld the eviction.

- ****Ejectment Cases:****

Between 1986 and 1987, SRRDC filed multiple complaints of forcible entry against the residents. While the Municipal Trial Court ruled for SRRDC, the RTC dismissed the cases as the land was under the Department of Agrarian Reform's (DAR's) jurisdiction. The CA upheld the RTC's dismissal.

- ****DAR Administrative Proceedings:****

In 1989, DAR issued a Notice of Coverage, placing the property under compulsory acquisition. SC and CA affirmed DARAB's decision covering the land under the Comprehensive Agrarian Reform Program (CARP), ordering compensation for SRRDC and issuing Certificates of Land Ownership Award (CLOA) to beneficiaries.

- ****Supreme Court Interaction:****

SRRDC and the residents filed multiple petitions to the Supreme Court, questioning the coverage of CARP, the properties' status (park/watershed), and beneficiary qualifications.

The SC initially remanded the case to DARAB for re-evaluation and temporarily stayed the distribution of CLOAs.

****Issues:****

1. ****Property Classification:****

- Whether the property is agricultural and subject to CARP.
- Proper evaluation of the land's current use for agricultural purposes versus its classification as a park/watershed.

2. ****Cart Coverage and Beneficiary Rights:****

- Validity of acquiring the property under CARP.
- Correct interpretation and application of beneficiary qualification under Section 22 of R.A. No. 6657.

3. ****Just Compensation:****

- Proper determination and payment of just compensation to SRRDC for the land acquisition.

4. ****Jurisdictional Questions:****

- Whether DARAB had jurisdiction to determine the coverage and classification issues.
- Appropriateness of DAR Secretary determining beneficiary qualification.

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

- ****Property Classification and Agricultural Coverage**:**

The Supreme Court affirmed DARAB's findings that the property is agricultural, suitable for farming, and not part of a declared watershed. It held that prior classifications (e.g., park or watershed claims) did not exempt the land from CARP as the land had been continuously used for agricultural purposes.

- ****Beneficiary and Distribution Rights**:**

The Court upheld the identification of farmer-beneficiaries by DAR and the issuance of CLOAs as valid. The Court ruled that the administrative power properly addressed the classification and beneficiary identification, dismissing SRRDC's assertion of the residents being mere squatters.

- ****Just Compensation**:**

The Court ordered Land Bank of the Philippines to convert the trust account to a deposit

account with a 12% annual interest from the trust establishment to conversion to cash/deposit.

- **Jurisdiction and Procedural Matters:**

The Court confirmed DARAB's jurisdiction over the CARP coverage and valuation contest. SRRDC's active involvement in DARAB's process precluded any jurisdictional objections. It also directed SRRDC to stop disrupting the farmer-beneficiaries' possession.

Doctrine:

Established the principle that land continuously used for agricultural purposes as of the effectivity of RA 6657 does not lose its agricultural nature due to subsequent local government reclassification unless there is a clear and retroactive legislative or executive declaration.

Class Notes:

- **CARL (RA 6657):** Comprehensive Agrarian Reform Law of 1988 aiming to distribute agricultural lands.
- **CARP:** Program to redistribute agricultural land to farmers.
- **Land Classification:** Local ordinances on land use cannot retroactively change the nature of existing agricultural land.
- **Qualified Beneficiaries:** Includes landless lessees, tenants, and farmworkers as per Section 22 of RA 6657.
- **Jurisdiction:** DAR Secretary's role in adjudicating land classification and beneficiary qualification under CARP.

Historical Background:

The conflict highlights land reform issues in the Philippines, emphasizing tensions between large landowners and tenant farmers/occupants. The legal battle demonstrates the complexity of implementing comprehensive agrarian reform amidst existing local governance policies and stakeholder interests. This case reflects broader agrarian struggles in the region, spanning historical land occupation, evolving land-use policies, and agrarian justice movements post-martial law era.