

## Title: Provident Tree Farms, Inc. v. Hon. Demetrio M. Batario, Jr., Commissioner of Customs, and A.J. International Corporation

## Facts:

### Detailed Timeline:

1. **April 5, 1989:** A.J. International Corporation (AJIC) imported four containers of matches from Indonesia.
2. **April 12, 1989:** The Bureau of Customs released the Indonesian shipment.
3. **April 19, 1989:** AJIC imported two more containers of matches from Singapore.
4. **April 25, 1989:** Secretary Fulgencio S. Factoran, Jr., of the Department of Natural Resources and Environment issued a certification asserting sufficient local supply of softwood for match production.
5. **May 5, 1989:** PTFI filed a complaint for injunction and damages with a prayer for a temporary restraining order against the Commissioner of Customs and AJIC at the Regional Trial Court of Manila. The case was docketed as Civil Case No. 89-48836.
6. **June 14, 1989:** AJIC filed a motion to dismiss the complaint.
7. **July 28, 1989:** The motion to dismiss was denied by the court.
8. **February 8, 1990:** On AJIC's motion for reconsideration, the court dismissed the case citing lack of jurisdiction.
9. **February 20, 1990:** PTFI received the court's order of dismissal.
10. **March 7, 1990:** PTFI filed a motion for extension to file a petition for review on certiorari.
11. **March 19, 1990:** The Supreme Court granted PTFI a 30-day extension to file the petition.
12. **April 6, 1990:** PTFI filed the petition.

### Procedural Posture:

PTFI's complaint was initially denied dismissal but was later dismissed upon reconsideration due to the trial court's lack of jurisdiction over determining the legality of importations. PTFI then sought to annul this dismissal before the Supreme Court.

## Issues:

1. **Jurisdictional Authority:** Whether the Regional Trial Court has jurisdiction to enjoin the importation of matches and order the Bureau of Customs to impound such imports.
2. **Relevance of the Revised Forestry Code (Section 36):** Whether PTFI can directly invoke this provision to enforce an importation ban through the regular courts.
3. **Procedural Adequacy:** Whether the claims for damages and injunctive relief can

proceed despite the administrative jurisdiction over import bans.

#### ## Court's Decision:

1. **Jurisdictional Authority**: The Supreme Court held that the exclusive jurisdiction over seizure and forfeiture cases lies with the Bureau of Customs per Sections 602 and 1207 of the Tariff and Customs Code. Therefore, the Regional Trial Court overstepped its boundaries in interfering with matters that fall within the administrative purview.
2. **Revised Forestry Code's Section 36**: The enforcement of import bans stated under Section 36 of the Revised Forestry Code remains within the Bureau of Customs' duties. The Court emphasized that absent statutory procedures does not strip the Bureau of its jurisdiction.
3. **Injunctive and Damage Claims**: The Court ruled that seeking injunctive relief and damages based on the alleged illegality of importation requires a preceding administrative determination. As the pending administrative proceedings impliedly acknowledge legality, the damages claim premised on importation illegality is premature.

#### ## Doctrine:

##### ### Exclusive Jurisdiction:

The Tariff and Customs Code vests exclusive original jurisdiction over seizure and forfeiture cases in the Bureau of Customs. Courts may not prematurely involve themselves in such matters, respecting the primary jurisdiction of administrative tribunals unless grave abuse of discretion is evident.

##### ### Primary Jurisdiction Doctrine:

Administrative agencies have primary jurisdiction over issues within their specialization necessitating technical expertise. Judicial intervention is warranted only after administrative remedies are exhausted or if there is an evident grave abuse of discretion.

##### ### Statutory Rights Enforcement:

The enforcement of statutory rights cannot be hindered by the absence of specific statutory procedures. Administrative agencies may adopt reasonable methods to perform their functions effectively.

#### ## Class Notes:

1. **Primary Jurisdiction Doctrine**: Courts defer to administrative agencies on matters requiring specialized technical knowledge.
2. **Exclusive Jurisdiction of Administrative Bodies**: Tariff and Customs Code Sections 602

and 1207.

3. **Enforcement of Statutory Rights**: Agencies have leeway to adopt procedural methods in the absence of statutory guidelines. This maintains agency prerogatives in exercising jurisdiction (Section 608, Tariff and Customs Code).

4. **Mandamus and Discretionary Acts**: Mandamus cannot compel acts at agency discretion unless there's a grave abuse.

#### ### Relevant Legal Statutes:

1. **Section 602(g), Tariff and Customs Code**: General duties and exclusive original jurisdiction over seizure and forfeiture.

2. **Section 1207, Tariff and Customs Code**: Collector's jurisdiction over conditions for prohibited/import-restricted items.

3. **Section 36, Revised Forestry Code**: Ban on wood and wood-derived products import if local supply exists.

#### ## Historical Background:

This case occurred in the context of the Philippines' policy to support local industries under the Revised Forestry Code by restricting imports when sufficient local resources are available. The enforcement of such policies through administrative bodies like the Bureau of Customs highlights the broader administrative apparatus and jurisdictional boundaries in trade regulation.