

**## Title:**

**\*\*Iloilo Palay and Corn Planters Association, Inc. et al. vs. Jose Y. Feliciano et al.\*\***

**## Facts:**

1. **\*\*Initial Steps\*\***:

- **\*\*December 26, 1964\*\***: Jose Y. Feliciano, Chairman, and General Manager of the Rice and Corn Administration (RCA), wrote to the President of the Philippines recommending immediate importation of 595,400 metric tons of rice due to a shortage, as suggested by the National Economic Council (NEC) in Resolution No. 70, series of 1964.
- **\*\*December 27, 1964\*\***: The President forwarded the recommendation to his cabinet.
- **\*\*December 28, 1964\*\***: The cabinet approved the importation.

2. **\*\*Execution\*\***:

- **\*\*January 4, 1965\*\***: The President designated the RCA as the agency responsible for the importation. Feliciano announced an invitation to bid for the importation with the bid scheduled for February 1, 1965.

3. **\*\*Legal Challenge\*\***:

- The Iloilo Palay and Corn Planters Association, Inc., along with Ramon A. Gonzales (as a taxpayer), filed a petition with the Supreme Court of the Philippines seeking to restrain Feliciano from conducting the bidding and any other actions related to the importation.
- **\*\*Preliminary Injunction\*\***: The petitioners requested the issuance of a writ of preliminary injunction which was granted by the Supreme Court after filing a bond of P50,000.00 on February 10, 1965.

4. **\*\*Respondents' Position\*\***:

- The respondents did not dispute the petition's essential allegations but justified the importation based on Republic Act 2207, which allows government importation of rice during a certified national emergency.

**## Issues:**

1. **\*\*Validity of Government's Importation\*\***:

- Whether the government, under Republic Act 2207, could legally undertake the rice importation despite the apparent prohibition in Republic Act 3452.

2. **\*\*Existence of National Emergency\*\***:

- Whether the certification by the NEC regarding a shortage constituting a national emergency was valid.

3. **Appropriation of Funds**:

- Whether there was a legal appropriation of funds required to finance the rice importation.

**Court's Decision:**

1. **Republic Act 2207 vs. Republic Act 3452**:

- The Supreme Court acknowledged that Republic Act 3452 seemed to prohibit government agencies from importing rice except under specific circumstances handled by private parties. However, it found that Republic Act 2207 still stood and allowed for government intervention in case of a national emergency certified by the NEC. Since NEC had indeed certified such an emergency, the RCA's action was permissible under RA 2207.

2. **Implied Repeal Argument**:

- The Court did not find an irreconcilable inconsistency between RA 2207 and RA 3452. RA 2207 permits government importation during a national emergency, while RA 3452 deals with importation under normal conditions. Hence, no implied repeal of the former by the latter.

3. **Funding Appropriation**:

- The Court addressed concerns regarding the absence of specific legislative appropriations by citing that existing laws authorized the RCA to borrow and secure funds to carry out its objectives. Specifically, RA 663 empowered the RCA to finance necessary operations, which extended to the rice importation in question.

**Doctrine:**

- **Presumption Against Implied Repeals**:

- The court upheld that unless an irreconcilable inconsistency and repugnancy exist, existing laws are not presumed to have been repealed by newer statutes.

- **Government Authority in Emergencies**:

- The ruling emphasized that in cases of verified national emergencies, the government retains the right to undertake necessary measures, including importation, as long as previously enacted laws like RA 2207 provide such provisions.

**Class Notes:**

1. **Elements of Republic Act 2207**:

- General prohibition of rice and corn importation.
- Exception: Government agency may import in emergency situations certified by the NEC.

2. **Elements of Republic Act 3452**:

- Importation of rice and corn is generally left to private parties.
- Government agencies are prohibited from importing except in emergencies not covered by the act.

3. **Implied Repeal Presumption**:

- Repeals by implication are disfavored, and both statutes must be harmonized unless an explicit contradiction exists.

4. **Financing Public Projects**:

- Statutory provisions allowing agencies to borrow funds can fulfill financing requirements without explicit appropriations in certain cases.

**Historical Background:**

- **Post-War Economic Challenges**:

- This case arose in the context of ensuring food security in the Philippines during a period of economic adjustment post-independence and post-World War II reconstruction.

- **Legislative Response to Agricultural Needs**:

- The legislation involved reflected attempts to stabilize rice and corn prices and availability amidst fluctuating local production and periodic shortages.