

Title: Orlando Farm Growers Association and Glicerio Añover v. National Labor Relations Commission and Others, GR No. 118892, September 11, 1998

Facts:

1. Orlando Farm Growers Association, led by its President Glicerio Añover, is an association of landowners producing export-quality bananas in Davao del Norte.
2. Respondents, who were employed as farm workers by individual landowners, performed packing and harvesting tasks on the petitioner's plantation.
3. From January 8, 1993, to July 30, 1994, the respondents were dismissed from their positions.
4. The respondents filed several complaints against the petitioner for illegal dismissal and monetary benefits. These cases were consolidated and handled by Labor Arbiter Newton R. Sancho.
 - September 6, 1995: Labor Arbiter ruled in favor of respondents, ordering reinstatement and back wages totaling P1,047,720.92.
5. Petitioners appealed this decision to the National Labor Relations Commission (NLRC).
 - December 26, 1996: NLRC affirmed the Labor Arbiter's decision.
 - February 25, 1997: NLRC denied petitioner's motion for reconsideration.
6. Petitioners then filed a petition for certiorari with the Philippine Supreme Court.

Issues:

1. Whether an unregistered association can be considered an employer under the law.
2. Whether an employer-employee relationship existed between the respondents and the petitioner.
3. Whether the dismissal of respondents was conducted without just cause and in violation of due process.

Court's Decision:

1. Unregistered Association as Employer:
 - The Supreme Court held that under Article 212(e) of the Labor Code, the term "employer" includes associations acting in the employer's interest, directly or indirectly. The law does not require registration for an entity to be classified as an employer.
2. Employer-Employee Relationship:
 - The Court affirmed that substantial evidence supported the existence of an employer-employee relationship. The issuance of IDs, control over disciplinary measures, and acts consistent with employer responsibilities indicated such a relationship.

3. Just Cause and Due Process in Dismissal:

- The Court emphasized that petitioner failed to provide just cause or observe the due process requirement as stipulated under Article 282 of the Labor Code, thus rendering the dismissals illegal. The employees were entitled to full back wages from dismissal until reinstatement.

Doctrine:

1. An unregistered association can still be deemed an employer within the meaning of the Labor Code of the Philippines.
2. The essential elements indicating an employer-employee relationship include the manner of selection and engagement, payment of wages, power of dismissal, and the power of control over the employee's conduct.
3. For a dismissal to be valid, it must conform to the just causes under Article 282 and the two-notice rule: one for notifying the cause of termination and the other for the employee to respond.

Class Notes:

- Key elements when determining employer-employee relationships: selection & engagement, wage payment, power of dismissal, and control over conduct.
- Essential legal principles from Article 282 of the Labor Code concerning just causes for termination: serious misconduct, gross neglect, fraud, commission of a crime, and analogous causes.
- Due process in employee termination includes issuing a written notice of cause, allowing the employee to respond, and providing a final decision notice.

Historical Background:

This decision reflects the emphasis of Philippine labor law on protecting workers' rights amidst associations or other entities without formal registration. The judgment is consistent with labor jurisprudence prioritizing workers' protections under law irrespective of the employer's formal structure or registration. This case reinforces the statutory interpretation principle that when the law does not distinguish, neither should the courts.