

Title:

Heirs of Aida Pineda vs. Office of the President, Department of Environment and Natural Resources, and Heirs of Teofilo Pilando, Sr.

Facts:

1. **Application for Ancestral Land**: In 1991, Aida Pineda applied for an ancestral land claim over a 49,645-square-meter lot in Baguio City under Department of Environment and Natural Resources (DENR) Special Order No. 31, Series of 1990.
2. **Survey and Approval**: A survey was conducted from November 12-19, 1991, and approved by the Regional Surveys Division of the DENR on March 31, 1992. The land was a portion of Lot No. 1, PSU-223647, initially for Teofilo Pilando.
3. **Issuance of Certificates**: On June 24, 1993, the DENR issued four Certificates of Ancestral Land Claim (CALCs Bg-0032, Bg-0033, Bg-0034, and Bg-0035) covering 61,673 square meters to Aida Pineda.
4. **Petition for Annulment**: On August 22, 1996, the Heirs of Teofilo Pilando filed a petition to annul the CALCs, asserting that their ancestor had acquired the land through purchase in 1956/57 and had established prior rights.
5. **DENR Ruling**: On February 27, 2007, DENR annulled the CALCs issued to Pineda, recognizing the Heirs of Pilando's prior claims. The Heirs of Pilando were ordered to file an appropriate public land application.
6. **Office of the President Decision**: On March 30, 2011, the Office of the President affirmed the DENR's decision, citing the invalidity of the CALCs pre- and post-Indigenous Peoples' Rights Act (IPRA) in Baguio City.
7. **Court of Appeals Decision**: The CA affirmed decisions of the DENR and Office of the President, emphasizing Baguio City's exclusion from IPRA and the non-permanency of the CALCs.
8. **Supreme Court Petition**: On April 29, 2016, the Heirs of Pineda filed a petition for certiorari, arguing that their ancestral claims should be recognized despite Baguio City's supposed exclusion from IPRA.

Issues:

1. Whether the Court of Appeals erred in affirming the decisions of the DENR and Office of the President recalling the CALCs issued to the Heirs of Pineda.
2. Whether the Heirs of Pineda's claim over the land should be recognized given their assertion of native title predating the IPRA.

3. Whether the Heirs of Pilando had a superior claim to the land due to prior possession and occupation.

Court's Decision:

1. **Affirmation of DENR and Office of the President**: The Supreme Court denied the petition, affirming the decisions of the DENR and Office of the President. It reiterated that the CALCs were issued provisionally in anticipation of IPRA and did not confer ownership.

2. **Legal Basis and Exemption**: The Court emphasized that IPRA does not apply to Baguio City as per Section 78, and the Special Task Force under Special Order No. 31 was not authorized to issue conclusive land titles.

3. **Failure to Establish Ancestral Land Rights**: The Court highlighted that the Heirs of Pineda failed to convert their CALCs to Certificates of Ancestral Land Titles (CALTs) as required post-IPRA enactment.

4. **Prior Rights of the Heirs of Pilando**: The Court sided with the Heirs of Pilando, whose ancestors had recognized prior land rights based on long-term possession and occupation, validated through administrative and judicial precedents.

Doctrine:

- **Section 78 of IPRA**: Baguio City remains governed by its Charter, and IPRA's provisions do not apply. However, prior land rights and titles recognized before IPRA's effectivity are upheld.

- **Certificates of Ancestral Land Claim (CALCs)**: CALCs issued under DENR's Special Task Force are provisional and do not confer ownership until converted to CALTs.

- **Native Title Recognition**: Native titles must be substantiated through continuous historical possession and appropriate administrative recognition before IPRA.

Class Notes:

- **IPRA Exemption for Baguio City**: Under Section 78, Baguio City is excluded from IPRA's provisions but recognizes prior land rights established before the Act.

- **Certificates of Ancestral Land Claims (CALCs)**:

- **Rights**: CALC holders have rights to occupy and cultivate the land but do not have conclusive ownership.

- **CALTs**: CALCs must be converted to CALTs for rights of ownership.

- **Procedural Compliance**: Detailed procedural history is crucial in land rights cases involving ancestral claims.

- ****Land Claims Validity****: Claims must be backed by substantial evidence of historical possession and official recognition.

Historical Background:

- ****Baguio City Charter & IPRA Intersection****: The special legislative consideration of Baguio City's Charter vs. the general application of IPRA delineates specific exemptions and protections.

- ****Early Land Laws and Reservations****: Historical land acts (e.g., Public Land Act, Act No. 926) and civil reservation practices impact current land rights and claims, especially regarding ancestral lands.

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The above case brief provides an in-depth, structured dissection of the case suitable for academic purposes and legal research.