

# SALIGAN Batas

## Supreme Court Decision on the Bangsamoro Plebiscite: A Constitutional Mandate for Inclusive Voting

The Supreme Court's ruling in *Datu Sinsuat v. Ahod Ebrahim* on August 20, 2024, highlighted the balance between the Bangsamoro region's aspiration for self-governance and the authority of the 1987 Philippine Constitution. The decision, which resolved consolidated petitions G.R. Nos. 271741 and 271972, involved the creation of new municipalities within the Bangsamoro Autonomous Region in Muslim Mindanao (BARMM) through Bangsamoro Autonomy Acts (BAAs) Nos. 53, 54, and 55. The outcome of the case reaffirmed the limits of the Bangsamoro Transition Authority's (BTA) legislative power while reinforcing the principle of inclusive democratic processes through plebiscites.

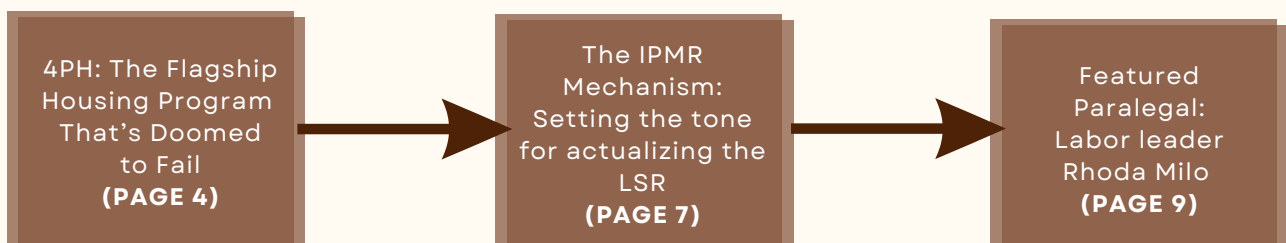
### Context of the case

The case arose from petitions challenging the BTA's move to establish three new municipalities—Nuling, Datu Sinsuat Balabaran, and Sheik Abas Hamza—from parts of the existing municipalities of Sultan Kudarat and Datu Odin Sinsuat. The BTA, acting under the authority of the Bangsamoro Organic Law (BOL), passed BAAs 53, 54, and 55 to create these new political subdivisions. However, petitioners argued that these acts overstepped the BTA's legislative mandate and violated constitutional provisions on the creation of local government units (LGUs).

One of the key issues raised was the lack of a plebiscite involving all affected voters in the municipalities of Sultan Kudarat and Datu Odin Sinsuat. Instead, Section 5 of the contested BAAs limited participation in the plebiscite to voters residing in the barangays comprising the proposed new municipalities. This move effectively excluded other voters from the parent municipalities, whose political and economic rights would inevitably be impacted by the reconfiguration of their local boundaries.



## WHAT'S INSIDE?



The petitioners argued that this exclusion violated the Constitution's mandate that all qualified voters in local government units directly affected by these changes must be allowed to participate in the plebiscites. Furthermore, they questioned whether the proposed new municipalities met the legal requirements for creation, including territorial definitions and economic viability, as prescribed by the Local Government Code of 1991.

### Autonomy Within Constitutional Bounds

The Bangsamoro Organic Law was enacted to provide a framework for greater autonomy and self-governance in the Bangsamoro region, which has long sought political and cultural self-determination. The BOL replaced the Autonomous Region in Muslim Mindanao (ARMM) with BARMM, granting it expanded powers and establishing the BTA as the interim governing body during the region's transition.

Under the BOL, the BTA has the power to create new municipalities within BARMM, but this power is not absolute. It must be exercised in accordance with the 1987 Constitution

and national laws. Article X, Section 10 of the Constitution stipulates that any creation, division, or alteration of LGUs must be approved by a majority vote in a plebiscite involving all political units directly affected. Similarly, the Local Government Code outlines the criteria for the creation of new LGUs, including minimum population and land area requirements, as well as the need to demonstrate financial capacity and sustainability.

These provisions ensure that any change in local government boundaries or the creation of new political subdivisions involves the participation of all stakeholders and that new LGUs are capable of functioning independently without undermining the viability of existing units. The petitioners in *Datu Sinsuat v. Ahod Ebrahim* argued that the BTA failed to meet these requirements, making BAAs 53, 54, and 55 unconstitutional.

### Upholding Democratic Principles

In its decision, the Supreme Court ruled in favor of the petitioners, issuing a final prohibitory injunction that stopped the scheduled plebiscites for September 7 and 21, 2024. The Court declared that Section 5 of

BAAs 53, 54, and 55 violated Article X, Section 10 of the 1987 Constitution and Article VI, Section 10 of the Bangsamoro Organic Law, both of which require the participation of all political units directly affected in plebiscites concerning the creation, division, or alteration of LGUs.

The Court noted that by restricting voting rights to the barangays of the newly proposed municipalities, the BTA disenfranchised voters from the municipalities of Sultan Kudarat and Datu Odin Sinsuat. **These voters, the Court emphasized, have a direct stake in the outcome of the plebiscites,** as the creation of new municipalities would alter their political and economic situations. **The exclusion of these voters violated the constitutional principle of inclusive representation and undermined the legitimacy of the plebiscite process.**

### Historical Context and Jurisprudence on Plebiscites

The Court's ruling was grounded in established jurisprudence on the conduct of plebiscites involving changes to LGU boundaries. In previous cases such as **Padilla, Jr. v. COMELEC**<sup>1</sup> and **Umali v. COMELEC**<sup>2</sup>, the Supreme

1 G.R. No. 103328 October 19, 1992.

2 G.R. No. 203974, April 22, 2014.

Court ruled that voters in both the new and parent municipalities must be included in plebiscites affecting political territory changes. The rationale is that any alteration of local government boundaries or the creation of new LGUs has significant implications for the political and economic rights of the people in the affected areas.

In ***Padilla, Jr. v. COMELEC***, the Court held that a plebiscite for the creation of a new municipality from existing barangays must involve the participation of voters in the parent municipality, as they have a vested interest in the outcome. Similarly, in ***Umali v. COMELEC***, the Court ruled that all voters in the province of Nueva Ecija should be allowed to vote in a plebiscite concerning the conversion of Cabanatuan City into a highly urbanized city, as the change would affect the entire province's political and economic status.

By referencing these legal precedents, the Court in *Datu Sinsuat v. Ahod Ebrahim* reaffirmed the principle that the right to participate in plebiscites should extend to all political units directly affected by the creation or reconfiguration of LGUs.

This ensures that the democratic process remains inclusive and representative of the broader population's interests.

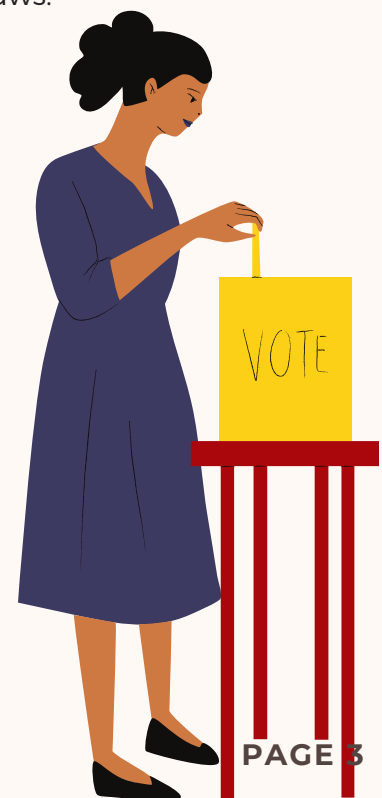
### **Strengthening Governance in the Bangsamoro Region**

The Supreme Court's decision has important implications for the Bangsamoro region and the broader governance framework in the Philippines. It serves as a reminder that while the Bangsamoro region enjoys a degree of autonomy under the BOL, it remains subject to the Constitution. The ruling underscores the need for the BTA and other legislative bodies within the region to exercise their powers within the boundaries set by the Constitution and to respect the democratic principles of participation and representation.

For the BTA, this decision is an opportunity to reevaluate its legislative processes and ensure that future enactments comply with constitutional requirements. The BTA must find ways to balance its mandate for local governance with its obligation to uphold the rule of law and protect the rights of all stakeholders. This means ensuring that

plebiscites and other democratic processes involve the participation of all affected constituents and that new LGUs meet the economic viability criteria established by the Local Government Code.

The ruling may also prompt a review of the Bangsamoro Organic Law's provisions on the creation of new LGUs. Lawmakers and stakeholders in the Bangsamoro region might consider clarifying or amending certain sections of the BOL to avoid future conflicts and ensure that the law's implementation aligns with the Constitution. The decision could lead to more stringent oversight by national bodies, such as the Department of the Interior and Local Government (DILG) and COMELEC, to guarantee that any future plebiscites in the region are conducted in compliance with national laws.



## Ensuring Inclusive and Representative Governance

The Supreme Court's decision in *Datu Sinsuat v. Ahod Ebrahim* reaffirms the fundamental democratic principle that all citizens impacted by changes to local government boundaries should have a right to be heard. By including voters from both the new and parent municipalities in the plebiscite, the Court upholds the principle that plebiscites must be inclusive and representative of the broader population's interests.

This decision is not merely about the technicalities of

creating new municipalities; it's about ensuring that the democratic process remains steadfast and that all affected communities are given a voice. As the Bangsamoro region continues its journey toward sustainable development and peace, the principles upheld in this ruling will serve as a guide for future legislative and governance reforms.

In a broader context, the decision is a reminder that the pursuit of local self-governance must be grounded in respect for constitutional standards. Autonomy should not be interpreted as exemption from national laws, and any legislative action that

impacts local governance must involve a transparent, inclusive, and participatory process.

As the Bangsamoro region evolves, the lessons learned from *Datu Sinsuat v. Ahod Ebrahim* will be crucial in shaping its governance structures and ensuring that its path toward self-determination remains aligned with the rule of law and democratic values. The Supreme Court's ruling is a testament to the enduring principle that even in the pursuit of autonomy, the Constitution remains supreme. #

## 4PH: The Flagship Housing Program That's Doomed to Fail

In the early months of his administration, President Ferdinand Marcos, Jr. announced his target of building one million housing units per year during his term. The goal was to cut the housing backlog of six million homes, which could otherwise balloon to 11 million by 2028.<sup>1</sup> To do this, Housing Secretary Jose Rizalino Acuzar launched the Pambansang Pabahay para sa Pilipino Program (4PH),<sup>2</sup> which was later declared a flagship program of the national government that entailed full support and cooperation from government agencies and local government units (LGUs).<sup>3</sup> Thus, the Department of Human Settlements and Urban Development (DHSUD) channeled virtually all of its resources and attention to the program's implementation. Even key shelter agencies like the Social Housing Finance Corporation (SHFC), which had been in charge of the Community Mortgage Program (CMP) for community-led housing, jumped into the fray to support the construction of 4PH projects.<sup>4</sup>

<sup>1</sup> Beatrice Pinlac, Marcos aims to build 1 million low-cost houses annually: 'We will try very, very hard', INQUIRER.net, November 10, 2022, available at <https://newsinfo.inquirer.net/1691691/marcos-aims-to-build-1-million-low-cost-houses-annually-we-will-try-very-very-hard> (last visited Oct. 11, 2024).

<sup>2</sup> DHSUD Dep't Circ. 2022-004.

<sup>3</sup> Exec. Order No. 34 (2023).

<sup>4</sup> Social Housing Finance Corp., SHFC, Manila LGU explore ways to expedite 4PH projects construction in the city, SHFC Website, March 25, 2024, available at <https://www.shfc.dhsud.gov.ph/shfc-manila-lgu-explore-ways-to-expedite-4ph-projects-construction-in-the-city> (last visited Oct. 11, 2024).



However, two years after it was launched, 4PH has not met its target. As of September 2024, only 12,731 housing units are expected to be finished by the end of the year.<sup>5</sup> A month earlier, the government adjusted its target from six million to only four million homes by 2028, citing delays in financing and construction.<sup>6</sup> The following day, DHSUD further cut the target to 3.2 million homes by 2028.<sup>7</sup> It appears that the original target of one million homes per year is becoming more and more unrealistic.

One major issue that has been raised in public discussions on 4PH is the affordability of housing units for the intended market. Ostensibly, 4PH aims to provide in-city housing for informal settler families.<sup>8</sup> This is a significant departure from the government's decades-long strategy of off-city

relocation to distant peri-urban areas, which has been associated with poor outcomes and social exclusion.<sup>9</sup> To maximize the available land in cities, the program prioritizes vertical housing, specifically, high-rise condominium buildings.<sup>10</sup> It invites private developers to build high-rise condominiums on available private or public land to be identified by LGUs. Then, the condominium units will be sold to beneficiaries through subsidized financing by Pag-IBIG. However, even with state subsidies for interest payments, the estimated monthly amortization for each unit is expected to be around P3,500 to P4,000. Add to this the maintenance and operating expenses for high-rise buildings, which are estimated to be about P2,000 per household, the total monthly expenses will be about P6,000 per household. This is simply unaffordable for an informal settler family.<sup>11</sup>

Based on the 2018 Family Income and Expenditure Survey, the bottom 30 percent of Filipino families earned at most about P14,000 a month and spent at most about P12,250 a month. Thus, the estimated total monthly cost of a 4PH unit would account for a whopping 49 percent of these families' expenditures, whereas in 2018 their spending for housing only accounted for eight percent of their expenditures or less than P1,000 a month.<sup>12</sup> Even if the monthly amortization is somehow reduced to P2,700, as targeted by DHSUD's Davao regional director,<sup>13</sup> this would still be almost triple the average spending for housing of the bottom 30 percent of families. Without likely takers from the program's target market, there is little incentive for private developers to invest in 4PH. Perhaps conceding this, DHSUD has finally decided to take over the developers' role in the program through SHFC

5 Edjen Oliquino, *DHSUD to miss 2023 housing target, builds only 13,000 units under 4PH program*, Daily Tribune, September 18, 2024, available at <https://tribune.net.ph/2024/09/17/dhsud-to-miss-2023-housing-target-builds-only-13000-units-under-4ph-program> (last visited Oct. 11, 2024).

6 Business World, *Philippines cuts housing target due to slow private financing*, Business World, August 7, 2024, available at <https://www.bworldonline.com/editors-picks/2024/08/07/612808/philippines-cuts-housing-target-due-to-slow-private-financing> (last visited Oct. 11, 2024).

7 Llanesca Panti, *Gov't cuts housing units target from 4M to 3.2M by 2028*, GMA News Online, August 8, 2024, available at <https://www.gmanetwork.com/news/topstories/nation/916427/gov-t-cuts-housing-units-target-from-4m-to-3-2m-by-2028/story> (last visited Oct. 11, 2024).

8 DHSUD, *4PH Operations Manual: Requirements, processes, and guidelines for the implementation of the 4PH Program* (February 6, 2023), available at [https://dhsud.gov.ph/wp-content/uploads/Laws\\_Issuances/4PH/4PH%20Operations%20Manual.pdf](https://dhsud.gov.ph/wp-content/uploads/Laws_Issuances/4PH/4PH%20Operations%20Manual.pdf) (last visited Oct. 11, 2024).

9 Segundo Romero, *Why in-city resettlement is best*, Philippine Daily Inquirer, August 5, 2019, available at <https://opinion.inquirer.net/123065/why-in-city-resettlement-is-best> (last visited Oct. 11, 2024).

10 DHSUD Circ. No. 2022-004.

11 Kurt Dela Peña, *4PH: Many still can't afford P4,000 monthly housing payment*, INQUIRER.net, July 28, 2023, available at <https://newsinfo.inquirer.net/1808755/4ph-many-still-cant-afford-p4000-monthly-housing-payment> (last visited Oct. 11, 2024).

12 Philippine Statistics Authority, *2018 Family Income and Expenditure Survey 26-28* (2020).

13 Ivy Tejano, *Gov't housing program 4PH remains on track in Davao City – Magno*, Manila Bulletin, June 25, 2024, available at <https://mb.com.ph/2024/6/24/gov-t-housing-program-4-ph-remains-on-track-magno> (last visited Oct. 11, 2024).

and the National Housing Authority (NHA).<sup>14</sup> This of course, begs the question: How does 4PH differ now from other housing programs of the government?

Various other concerns have been raised regarding 4PH. Difficulty in estate management is one. Maintaining elevators, fire sprinkler systems, and distributing costs for 22-story buildings will not be an easy task, whether for LGUs or the beneficiaries or their association.<sup>15</sup> There is also the matter of selection criteria for beneficiaries.

Although issuances about the program state that it targets informal settler families, the fine print does not ensure this. The program's eligibility criteria do not explicitly limit beneficiaries to informal settlers or underprivileged and homeless citizens. Neither is there any requirement that the beneficiary does not own any other home or real estate. In fact, the program admittedly prioritizes workers in the formal economy,<sup>16</sup> whereas many informal settlers work in the informal economy.

If the program does not actually target informal settler families or underprivileged and homeless citizens, then it cannot qualify as a socialized housing program. The Urban Development and Housing Act of 1992 defines socialized housing as a housing program or project "covering houses and lots or home lots only, or residential condominium units undertaken by the government or the private sector for the underprivileged and homeless citizens which shall include sites and services development, long-term financing, liberalized terms on interest payments, and such other benefits."<sup>17</sup>

Most fundamentally, 4PH was formulated and is being implemented without the participation of the target beneficiaries themselves. It therefore comes as no surprise that the program was designed and developed without the needs, circumstances, and aspirations of the directly affected stakeholders in mind. Instead, it uses a one-size-fits-all solution<sup>18</sup> that has never truly worked in the Philippines or in other

parts of the world. This is despite the well-documented successes of people's plans, which are formulated by the communities themselves. Unfortunately, even communities that are already in the process of realizing their people's plans are now under threat of losing available land in cities to 4PH. Instead of the housing projects that the communities designed, high-rise buildings under 4PH have been proposed by the government on the same pieces of land identified in their people's plans. Thus, if left unchanged, the program might just crowd out informal settler families from available lands in cities. The likely outcome is not unfamiliar: empty housing projects that benefited no one but the contractors. #



14 Elizabeth Marcelo, *Government takes developer role in 4PH program*, The Philippine Star, August 9, 2024, available at <https://www.philstar.com/business/2024/08/09/2376418/government-takes-developer-role-4ph-program> (last visited Oct. 12, 2024).

15 Jose de Guzman, *DHSUD should reconsider building high-rise condos for informal settler families*, Philippine Daily Inquirer, January 13, 2023, available at <https://opinion.inquirer.net/160283/dhsud-should-reconsider-building-high-rise-condos-for-informal-settler-families> (last visited Oct. 12, 2024).

16 Supra note 8, 4PH Operations Manual, at 8.

17 Rep. Act No. 7279 (1992), § 3 (r), amended by Rep. Act No. 10884 (2016).

18 Mary Racelis, *High-rise housing for the urban poor?*, Philippine Daily Inquirer, February 8, 2023, available at <https://opinion.inquirer.net/160906/high-rise-housing-for-the-urban-poor> (last visited Oct. 12, 2024).

## The IPMR Mechanism: Setting the tone for actualizing the LSR

The Philippines espouses decentralized democracy, as its governmental powers are devolved to local governments and provide for a wide range of mechanisms for people's participation in local governance. One of these novel mechanisms is the mandatory participation of indigenous peoples in policy-making bodies of all four local government units: province, cities, municipalities, and barangays.<sup>1</sup> The participation of an IP representative in a particular local legislative council is mandatory when (1) there exists an ancestral domain or ancestral land in the LGU,<sup>2</sup> and (2) when the IP/ICC population threshold is reached.<sup>3</sup> In the first instance, the IPMR shall be selected from the holder of the AD. In the second instance, the threshold is determined by the total population of the LGU divided by the number of members of the local legislative body. Even if the two instances are not present, the LGU can still allow the IP's representation in the local legislative council, when initiated by the IPs/ICCs.<sup>4</sup> In 2021, the NCIP recognized the right of resettled and migrant IPs who are residing in a particular AD/AL for more than 10 years to participate in the selection process.<sup>5</sup>

Under the right to self-determination and due regard to indigenous political structures, the selection process of the IPMR shall be following the IPs' local guidelines and customary laws, which shall be formulated collectively and through consensus-building.<sup>6</sup> It is to be noted, however, that the same Guidelines provides for qualifications<sup>7</sup> and disqualifications.<sup>8</sup> Further, it shall be facilitated by an NCIP personnel.<sup>9</sup> The local guidelines, at every selection process, should be certified by the NCIP Regional Director as conforming to the National Guidelines before any selection process can be

conducted.<sup>10</sup> Witnesses to the selection process include representatives from the LGU concerned, the DILG, CSOs, and other stakeholders.<sup>11</sup>

When the selection process is completed in accordance with the local guidelines, a verified report with a copy of the local guidelines shall be submitted to the NCIP Provincial Officer, in case of barangay IPMR, and the NCIP Regional Director, in case of municipal, city, or provincial IPMR, for evaluation. If found to be regular and sufficient, a Certificate of Assumption (COA) is issued within 15 days.<sup>12</sup> The Guidelines provide that the IPMR shall take their oath before an authorized

officer and the NCIP shall notify appropriate bodies of the assumption of office.<sup>13</sup> Missing in the Guidelines is the Certificate of Recognition (CR) issued by the Regional Director of the DILG to the IPMR Representative. While there is no comprehensive DILG issuance on the matter, several DILG regional offices adopted their respective procedure for the issuance of CR for IPMR Representatives.<sup>14</sup> In these cases, the RD issues the CR upon review of the documents submitted by the requesting party, and issues the same to the Provincial, City, or Municipal DILG officers as the case may be. This process is recognized in

1 Section 16 of R.A. No. 8371

2 Section 6(a) of NCIP A.O. No. 01, Series of 2021

3 Section 6(b) of NCIP A.O. No. 01, Series of 2021

4 Section 6(c) of NCIP A.O. No. 01, Series of 2021

5 Section 6(d) of NCIP A.O. No. 01, Series of 2021

6 Section 10 of NCIP A.O. No. 01, Series of 2021, as amended by CEB Resolution No. 2023-09-07-063, Series of 2023

7 Section 8 of NCIP A.O. No. 01, Series of 2021, as amended by CEB Resolution No. 2023-09-07-063, Series of 2023

8 Section 9 of NCIP A.O. No. 01, Series of 2021, as amended by CEB Resolution No. 2023-09-07-063, Series of 2023

9 Section 10.1 of NCIP A.O. No. 01, Series of 2021, as amended by CEB Resolution No. 2023-09-07-063, Series of 2023

10 Section 10.4 of NCIP A.O. No. 01, Series of 2021, as amended by CEB Resolution No. 2023-09-07-063, Series of 2023

a DILG opinion stating that the COA and the CR are sufficient legal basis for the IPMR.<sup>15</sup>

The period between the issuance of the COA and the transmittal of the documents to the relevant government agencies which is important in determining the IPMR's "actual" assumption in office is not detailed in the Guidelines. However, by practice, a Resolution by the Sanggunian, is almost always the final act of recognizing the IPMR's membership in the local legislative council.<sup>16</sup> The matter of the IPMR's actual assumption of office is important in determining the reckoning period for the commencement of their term, since the Guidelines state that the 3-year term shall commence from the actual assumption in office.<sup>17</sup> The DILG further opined that the term of the IPMR is not necessarily simultaneous with the term of the other regular and ex-officio members of the Sanggunian since the Guidelines are clear of the 3-year term.<sup>18</sup> The compensation and benefits

of IPMR is similar to the regular members of the Sanggunian.<sup>19</sup>

One distinct characteristic of the IPMR process is its faithful recognition that the powers, duties, and functions of the IPMR is derived from the community they represent. "As such, an IPMR shall, at all times, consult with, and secure approval from, the community and/or IPS all programs, projects, activities, and undertakings that will directly or indirectly affect the rights, interests, and well-being of the concerned ICC/IPs."<sup>20</sup> This safeguards the true intent of the IPRA in mandating an IP representative to the local legislative councils.

One of the criticisms of the IPMR process is its very low compliance rate. There are about 17 million IPs across 110 ethno-linguistic groups in the Philippines but the NCIP, in its Philippines Results Report 2019-2022 to the Open Government Partnership,<sup>21</sup> accounted for only 4,294 IPMRs: 30 in cities, 32 in provinces, 380 in

municipalities, and 3,852 in barangays, which is a 7% increase from the baseline in 2015. In 2011, the NCIP was mandated to prepare a list of all LGUs which have met the minimum threshold.<sup>22</sup> Still, a comprehensive list cannot be accessed. The issuance of the new Guidelines in 2021 and its amendments in 2023 aims to address the low compliance. Moreover, an enhanced campaign among IPs/ICCs, and local government across the country can increase IPMR participation in all levels of local governance.

Prior to the IPRA, the Local Government Code of 1991 mandates that local legislative councils of provinces, cities, and municipalities shall have representatives from the women, the labor, and an identified 3rd sector from the urban poor, indigenous cultural communities, disabled sector, or any other sector.<sup>23</sup> As the LGC and its IRR were found to be insufficient to implement the LSR mandate, there is a need to adopt a law. However,

11 Section 11.1(d) of NCIP A.O. No. 01, Series of 2021, as amended by CEB Resolution No. 2023-09-07-063, Series of 2023

12 Sections 17 and 18 of NCIP A.O. No. 01, Series of 2021

13 Section 11 of NCIP A.O. No. 01, Series of 2021, as amended by CEB Resolution No. 2023-09-07-063, Series of 2023

14 An example is Region 12 QP-R12-LGMED-39

15 DILG Legal Opinion No. 01, Series of 2015

16 An example is the process of recognizing an IPMR in the province of Isabela

17 Section 12 of NCIP A.O. No. 01, Series of 2021

18 DILG Legal Opinion No. 01, Series of 2015

19 Section 15 of NCIP A.O. No. 01, Series of 2021

20 Section 7 of NCIP A.O. No. 01, Series of 2021, as amended by CEB Resolution No. 2023-09-07-063, Series of 2023

21 [open.govpartnership.org/members/philippines/commitments/PH0065/](https://open.govpartnership.org/members/philippines/commitments/PH0065/) last accessed 24 September 2024

22 DILG-NCIP Joint Circular No. 001, series of 2011

23 Section 41(c) of R.A. 7160



years of advocacy proves this to be futile as this is not prioritized.

Moving forward, proposals for an LSR law can find guidance in the IPMR Guidelines. For one, the process of selection is genuine to sectoral representation as it gives them the right to determine own rules of selection. Further, it mandates for

consensus-building and consultation mechanism within the sectors. The province of Isabela is one of the few recorded cases of LSR implementation, with its selection and appointment as simple as that of the IPMR process. In its 11th Sanggunian Panlalawigan, 4 sectoral representatives are sitting as ex-officio members representing the IPs/ICCs, the

women, the labor, and agricultural workers. Advocates can draw out from the innovativeness and experience of the Province of Isabela in making LSR a reality. #

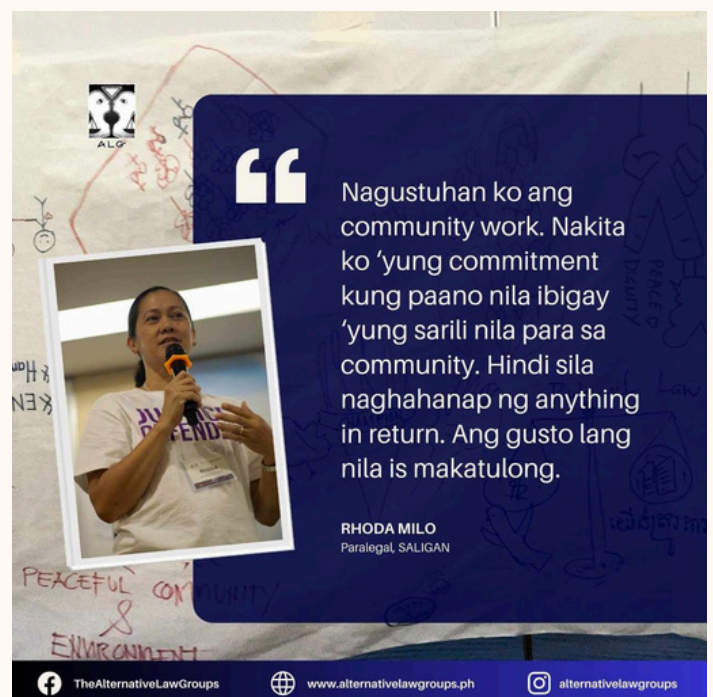
## Featured Paralegal: Labor leader Rhoda Milo reflects on her participation in the SEA paralegal exchange program

Last August 2024, I participated in a very diverse learning and sharing session organized by the Grassroots Justice Network - Southeast Asia.

It started with a three-day session from August 11 to 13 for the National Paralegal Exchange headed by Atty. Sheila Formento of the Alternative Law Groups (ALG) together with Atty. Marlon Manuel of NAMATI with around 16 participants of Community Based Paralegals from different groups and industries. It was followed by a session from August 15 to 17 for the Regional Paralegal Exchange in Bangkok, Thailand. The Philippine team was composed of six participants, namely, Jona Deanon from KAISAHAN (farmers and fisherfolk group), Chase Tolentino from Rainbow Rights Philippines (LGBTQIA+ group), Julie Ann Acido from Women's Legal and Human Rights Bureau (WLB), Jepong Bag-ao from BALAOD Mindanaw, Melvin Caymo from Humanitarian Legal Assistance Foundation (HLAF), and myself, as a paralegal from a labor union, from SALIGAN.

The exchange focused on the topic of Know, Use, and Shape the Law. Also discussed were the concerns of paralegals on Security, Capacity Building, Sustainability, and Solidarity concerns. It also aimed to reach out to more people in the community through the legal empowerment of grassroots paralegals through the solidarity network by sharing experiences and challenges from paralegals of different sectors. The exchange was participated by Malaysia, Myanmar, Indonesia, Laos, Cambodia, Thailand, and refugees from Assylum Thailand and the Philippines.

On the first day, I joined the group in visiting Assylum Thailand where refugees work to help out other displaced individuals.





I was moved by how these people work together with the hardships that each one experiences, to take note that they do this as voluntary work but with immense passion and commitment. The second day was quite fun and I enjoyed joining the use of Art as an expression in sharing paralegal work. I believe that art such as singing and dancing is a very power-

ful tool in expressing our message to everyone as these activities resonate deeply in the heart.

Overall, the experience was very fulfilling, and educative and brought out the passion in me for community work. I know it is not an easy feat but it will definitely fill up our hearts with inner joy and gratitude. #



**SALIGAN**  
SENTRO NG ALTERNATIBONG  
LINGAP PANLEGAL



(+63)(2)4266001 LOC.  
4858-4860



WWW.SALIGAN.ORG



SALIGAN@SALIGAN.ORG



/SALIGAN.ALAC

The views expressed in this newsletter do not reflect the views of the partners and networks of SALIGAN unless otherwise stated. The content of this newsletter does not constitute legal advice and has been published for informational purposes only.