November 16, 2026

**SC Partially Upholds Magna Carta of Filipino Seafarers,
Strikes Down Bond Requirement and Provisions Regulating Practice of Law**

The Supreme Court (SC) *En Banc*, during its session on November 11, 2026, acted on the following consolidated cases:

G.R. No. 278986, ***Atty. Sonny Matula et al. v. The Executive Secretary et al.***

G.R. No. 279373, ***Philippine Association of Maritime Institutions, Inc. et al. v. Maritime Industry Authority et al.***

G.R. No. 279790, ***Concerned Seafarers of the Philippines et al. v. The Executive Secretary et al.***

G.R. No. 280040, ***Eulemio G. Guimalan et al. v. The Executive Secretary et al.***

G.R. No. 280626, ***Association of Marine Officer & Ratings, Inc. et al. v. The Executive Secretary et al.***

The Supreme Court *En Banc* partially granted five consolidated Petitions, filed by seafarers, labor organizations, and maritime educational institutions, challenging the constitutionality of Republic Act No. 12021, otherwise known as the *Magna Carta of Filipino Seafarers*, and certain provisions of its Implementing Rules and Regulations (**IRR**) and related issuances.

In a Decision, penned by Associate Justice Maria Filomena D. Singh, the Court declared unconstitutional the bond requirement imposed on seafarers seeking to execute disputed monetary awards pending appeal or judicial review. It likewise invalidated certain provisions regulating the practice of law, while upholding the provisions governing maritime education and training.

Republic Act No. 12021, approved on September 23, 2024, and effective October 11, 2024, was enacted to codify the rights and obligations of Filipino seafarers, strengthen their protection, and improve maritime education and training in accordance with international standards.

Section 59

The Court declared unconstitutional and void Section 59, insofar as it required seafarers to post a bond before executing disputed monetary awards and

damages pending appeal or judicial review. Under the provision, monetary awards for wages, statutory benefits, and undisputed amounts were immediately executory. However, seafarers seeking execution of disputed amounts and damages were required to post a bond to ensure restitution should the award be subsequently reversed or modified.

The Court held that the bond requirement violated the Due Process and Equal Protection Clauses of the Constitution. It imposed a financial burden on seafarers seeking to enforce favorable labor judgments and subjected them to a disadvantage not similarly imposed on other workers. While recognizing the State's interest in preventing ambulance chasing and protecting the maritime industry against unrestituted awards, the Court found that these objectives did not justify the challenged restriction on the execution of monetary awards.

The Court likewise declared unconstitutional the authorization to use the Department of Migrant Workers' (**DMW**) Agarang Kalinga at Saklolo Para sa mga OFW na Nangangailangan (**AKSYON**) Fund to pay bond premiums, holding that the mechanism did not satisfy the constitutional requirement that public funds be used for a public purpose under Section 29(1), Article VI of the Constitution.

Sections 4 and 5, Rule III of Department of Labor and Employment (**DOLE**) Department Order No. 247, Series of 2025, were likewise declared unconstitutional and void insofar as they implemented the bond requirement.

Section 60

The Court declared unconstitutional and void Section 60 of Republic Act No. 12021 and Section 4 of Republic Act No. 10706, or the *Seafarers Protection Act*, insofar as they regulated the practice of law in violation of Section 5(5), Article VIII of the Constitution. The challenged provisions imposed restrictions concerning legal representation, including a 10% ceiling on fees, requirements for notarized certifications and undertakings, and rules governing the collection of fees from seafarers.

The Court distinguished permissible legislative regulation of labor representation from matters falling within its exclusive constitutional authority to regulate the practice of law. It explained that while Congress may enact measures to protect seafarers against ambulance chasing and abusive practices, the regulation of lawyers' professional conduct and the practice of law remains within the Supreme Court's exclusive authority.

Section 1, Rule XXII of the IRR

The Court declared *ultra vires* and void Section 1, Rule XXII of the IRR insofar as it applied Section 59 to monetary awards arising from complaints filed on or after the effectivity of Republic Act No. 12021. The Court found that the implementing provision contravened Section 94 of the law, which expressly preserves the rights, privileges and benefits previously enjoyed by Filipino seafarers before its effectivity. It reiterated that administrative regulations must conform to the statute they implement and cannot diminish rights expressly preserved by law.

Sections 75, 76, and 78 on maritime education and training

The Court denied the challenge to Sections 75, 76, and 78 of Republic Act No. 12021, holding that these provisions did not violate the constitutional guarantee of academic freedom. The Philippine Association of Maritime Institutions, Inc., together with other maritime educational institutions, questioned the transfer of regulatory authority over maritime education to the Maritime Industry Authority (**MARINA**), as well as requirements concerning enrollment, shipboard training, and related fees.

The Court recognized that academic freedom protects the institutional autonomy of higher educational institutions. Nonetheless, this freedom does not exempt educational institutions from reasonable State regulation. It found that the challenged provisions established minimum regulatory standards intended to ensure the quality of maritime education, the competency of Filipino seafarers, and compliance with applicable international maritime standards. Particularly, the requirements relating to enrollment and available shipboard training opportunities were considered reasonable measures to address the availability of practical training for maritime students. The prohibition against charging tuition or matriculation fees for shipboard training conducted by third-party providers was likewise sustained as a measure against unjustified charges.

The enactment of Republic Act No. 12021

The Court rejected the challenges to the legislative process leading to the enactment of Republic Act No. 12021.

It found that Congress complied with the constitutional requirements governing the passage of legislation, including the three-reading rule and the presentment requirement under Article VI of the Constitution. The Court likewise upheld the President's Certification of Urgency and recognized the authority of the Bicameral Conference Committee to reconcile differences between the House and Senate versions of the proposed legislation. It also rejected the contention that Section 59 and Chapter XVIII on maritime education and training constituted unconstitutional riders under the one-title-one-subject rule.

The Court thus sustained the procedural validity of Republic Act No. 12021.

The Court emphasized that although the *Magna Carta of Filipino Seafarers* was enacted to advance the welfare of Filipino seafarers, all legislative measures must conform to the Constitution. The law therefore remains valid and enforceable, except for the provisions expressly declared unconstitutional or void.

The consolidated Petitions were **PARTIALLY GRANTED**.

The full text of the Decision will be uploaded to the SC website once available. *(Courtesy of the SC Office of the Spokesperson*)