

Republic of the Philippines  
**HOUSE OF REPRESENTATIVES**  
Quezon City, Metro Manila

**TWENTIETH CONGRESS**  
First Regular Session

House Resolution No. 962



---

Introduced by  
**KABATAAN Party-list Rep. RENEE LOUISE M. CO,**  
**ACT Teachers Party-list Rep. ANTONIO L. TINIO, and**  
**Gabriela Women's Party Rep. SARAH JANE I. ELAGO**

---

**A RESOLUTION**

**DIRECTING THE HOUSE COMMITTEE ON HUMAN RIGHTS TO URGENTLY CONDUCT AN INVESTIGATION, IN AID OF LEGISLATION, ON THE MASSACRE OF UNARMED CIVILIANS ALLEGEDLY PERPETRATED BY THE 79TH INFANTRY BATTALION OF THE ARMED FORCES OF THE PHILIPPINES IN TOBOSO, NEGROS OCCIDENTAL, WHICH CONSTITUTES A VIOLATION OF HUMAN RIGHTS AND INTERNATIONAL HUMANITARIAN LAW**

**WHEREAS**, Article II, Section 2 of the 1987 Philippine Constitution provides that “[t]he Philippines renounces war as an instrument of national policy, adopts the generally accepted principles of international law as part of the law of the land and adheres to the policy of peace, equality, justice, freedom, cooperation, and amity with all nations”;

**WHEREAS**, Article II, Section 11 of the same also provides that “[t]he State values the dignity of every human person and guarantees full respect for human rights”;

**WHEREAS**, the Philippines is a state party to the Geneva Conventions of 1949 and their Additional Protocols, thereby legally binding the Philippine government to adhere to their principles and to enact policies that do not go in conflict with said principles;

**WHEREAS**, Common Article 3 of the Geneva Conventions states that “[p]ersons taking no active part in the hostilities, including members of armed forces who have

laid down their arms and those placed 'hors de combat' by sickness, wounds, detention, or any other cause, shall in all circumstances be treated humanely, without any adverse distinction founded on race, colour, religion or faith, sex, birth or wealth, or any other similar criteria”;

**WHEREAS**, Republic Act (R.A.) No. 9851, or the “Philippine Act on Crimes Against International Humanitarian Law, Genocide, and Other Crimes Against Humanity”, declares it the policy of the State to adopt “the generally accepted principles of international law, including the Hague Conventions of 1907, the Geneva Conventions on the protection of victims of war and international humanitarian law, as part of the law of our nation”;

**WHEREAS**, in Section 3(q) of the same, the definition of a “[p]rotect person’ in an armed conflict” includes “a civilian or any person not taking a direct part or having ceased to take part in the hostilities in the power of the adverse party”;

**WHEREAS**, Memorandum Order No. 32, signed by former President Rodrigo Duterte on 22 November 2018 and yet to be lifted during the term of President Ferdinand Marcos Jr., orders the deployment of additional military and police troops to various regions, including the Negros Island Region, which is meant to suppress “lawless violence” but has instead worsened state-perpetrated violence against the residents of those regions;

**WHEREAS**, from the 19th until the 20th of April 2026, focused military operations were conducted by the 79th Infantry Battalion of the Armed Forces of the Philippines (AFP) in Toboso, Negros Occidental, resulting in the forced evacuation of at least six hundred and fifty-three (653) residents from one hundred and sixty-eight (168) households, and the death of at least nineteen (19) individuals;

**WHEREAS**, the AFP, in its statements and press releases, maintained that all deaths from the focused military operations were of armed combatants and members of the New People’s Army (NPA);

**WHEREAS**, later reports from residents and witnesses on the ground dispute the assertion of the military, arguing that among those killed were unarmed civilians;

**WHEREAS**, among the nineteen, the following individuals have been identified and cast doubt on the “only armed combatants” claim of the AFP:

- (1) Roel Sabillo, 19, a local farmer;
- (2) RJ Nichole Ledesma, 30, a community journalist;
- (3) Alyssa Alano, 22, a student leader;

- (4) Maureen Santuyo, 24, a peasant advocate;
- (5) Errol Wendel, 24, a community researcher;
- (6) Lyle Prijoles, 40, a Filipino-American human rights advocate; and
- (7) Kai Sorem, 26, a Filipino-American cultural worker;

**WHEREAS**, KARAPATAN, a human rights group, has castigated the AFP for its military operations in Negros, citing that, regardless of the victims' status as armed combatant or unarmed civilian, "the sheer number of those killed triggers significant questions on the conduct of the operations including use of proportionate force, the steps taken to minimize casualties, and compliance with IHL and human rights";

**WHEREAS**, public outcry has erupted with the downpour of statements from people's organizations, civil society groups, and non-government entities condemning the military's actions and demanding that justice be served for the victims of the massacre;

**WHEREAS**, Commission on Human Rights (CHR) itself has also expressed its alarm over the issue and "has initiated an independent investigation" on the matter, stressing that "[d]etermination of status, circumstances of engagement, and proportionality must be based on verifiable facts and due process", while adding that "[i]n case of doubt, persons shall be presumed civilians";

**WHEREAS**, the current case of individuals killed in Toboso, Negros Occidental, adds to the list of inhumane acts perpetrated by state forces in the island region, exposing the failure of intensified militarization in the countryside to genuinely address the root causes of armed struggle in the country;

**NOW, THEREFORE, BE IT RESOLVED, AS IT IS HEREBY RESOLVED**, that the House of Representatives of the Republic of the Philippines direct the House Committee on Human Rights to urgently conduct an investigation, in aid of legislation, on the massacre of unarmed civilians allegedly perpetrated by the 79th Infantry Battalion of the Armed Forces of the Philippines in Toboso, Negros Occidental, which constitutes a violation of human rights and International Humanitarian Law;

**BE IT FURTHER RESOLVED**, that the House of Representatives express its support for the conduct of full, independent, and impartial investigations by the Commission on Human Rights and other credible human rights organizations on the matter;

**BE IT FURTHER RESOLVED**, that the House of Representatives condemn any and all disproportionate use of force and indiscriminate means of warfare carried out by


the military in its counter-insurgency operations, in line with the principles outlined in the Geneva Conventions of 1949 and their Additional Protocols; and

**BE IT FINALLY RESOLVED**, that the House of Representatives call for the immediate and formal termination of Memorandum Order No. 32, in order to relieve the Negros Island Region and all other regions included therein from worsening human rights violations committed by state actors.

*Adopted,*



**REP. RENEE LOUISE M. CO**  
*KABATAAN Party-list*



**REP. ANTONIO L. TINIO**  
*ACT Teachers Party-list*



**REP. SARAH JANE I. ELAGO**  
*Gabriela Women's Party*