

The Right of Accretion in Philippine Succession: A Comprehensive Analysis

Introduction: Clarifying the Two Forms of "Accretion" in Philippine Law

In the broad landscape of Philippine Civil Law, the term "accretion" appears in two distinct and unrelated contexts, a fact that can be a source of significant confusion for students, legal practitioners, and laypersons alike. A precise understanding of inheritance law requires, as a preliminary step, a clear demarcation between these two concepts.

The first concept is **accretion in Property Law**, more specifically known as alluvion. Governed by Article 457 of the Civil Code, this form of accretion refers to the process by which soil is gradually and imperceptibly deposited on lands adjoining the banks of rivers due to the action of the water's current.¹ The new land mass formed, the alluvion, becomes the property of the owner of the riparian land. This principle is a mode of acquiring ownership through natural forces and is confined to alluvial deposits along riverbanks; it does not apply to land formed by the action of the sea (littoral accretion), which remains part of the public domain.² The legal framework for this type of accretion also extends to the ownership of abandoned riverbeds and islets formed in non-navigable rivers.³ This report will not discuss this concept further, but its initial identification is crucial to prevent the misapplication of its principles to the law of succession.

The second, and the primary subject of this report, is the **right of accretion in Succession Law**, also known by its Latin name, *jus accrescendi*. This right is a mechanism within the law of inheritance, meticulously governed by **Articles 1015 through 1023 of the Civil Code of the Philippines**.⁷ It addresses situations where a share in an inheritance becomes vacant because a designated successor is unable or unwilling to receive it. Under specific conditions, this vacant portion is not distributed according to the rules of intestacy but is instead absorbed by the other co-heirs, co-legatees, or co-devisees who were called to the same inheritance.

This report aims to provide an exhaustive and nuanced analysis of the right of accretion within the context of Philippine succession. It will delve into its legal

foundations, the indispensable conditions for its operation, its distinct application in testate and intestate successions, and its complex interplay with superior rights such as substitution and representation. Through a systematic examination of the Civil Code provisions, relevant jurisprudence, and practical examples, this document will serve as a definitive guide to understanding when the right of accretion happens.

Part I: Foundational Principles of Accretion in Succession

Defining the Right of Accretion (Article 1015)

The cornerstone of the doctrine is found in Article 1015 of the Civil Code, which provides a comprehensive legal definition:

"Accretion is a right by virtue of which, when two or more persons are called to the same inheritance, devise or legacy, the part assigned to the one who renounces or cannot receive his share, or who died before the testator, is added or incorporated to that of his co-heirs, co-devisees, or co-legatees." ⁸

A careful dissection of this article reveals the fundamental elements of the right. First, it is a "right" (jus), not an obligation. The co-heir to whom a share accrues is free to accept or repudiate it.¹⁰ Second, it applies not only to heirs who inherit the entire estate or a fraction thereof, but also to legatees (recipients of specific personal property) and devisees (recipients of specific real property).¹² Third, it is triggered by the creation of a "vacant share," which occurs when a designated successor predeceases the decedent, renounces the share, or is incapacitated to receive it.⁷ The consequence is that this vacant share is "added or incorporated" into the shares of the remaining co-successors.

The Juridical Nature and Rationale

The legal justification for the right of accretion is rooted in the **presumed will of the decedent**.¹⁰ The law operates on the presumption that when a testator collectively calls a group of individuals to inherit the same property or portion thereof, the primary intention is for that specific property to remain within that designated group.¹⁰ The testator is deemed to have a preference for the co-heirs over any other potential successor. Therefore, should one member of the group be unable to take their share, the law presumes the testator would have wanted that share to be absorbed by the remaining members of the group rather than allowing it to be governed by the rules of

intestacy, which might pass it to individuals outside the testator's intended circle of beneficiaries.⁷

This rationale is pivotal because it establishes accretion as a presumptive rule, not an absolute one. Because it is founded on a mere presumption of intent, it must logically yield whenever the testator's actual intent is expressed, or when it conflicts with a stronger legal policy. This explains why an express provision for a substitute heir in a will, which is a direct statement of the testator's intent, will always defeat the right of accretion. Similarly, the right of representation in intestate succession, which is a mandatory rule of law designed to protect the decedent's direct lineage, is considered a superior policy that overrides the presumed intent underlying accretion.

Governing Legal Framework

The right of accretion in succession is specifically and exclusively governed by the provisions found in Book III, Title IV, Chapter 4, Section 1 of the Civil Code of the Philippines. The key articles are:

- **Article 1015:** Defines the right of accretion.
- **Article 1016:** Lays down the requisites for accretion in testamentary succession.
- **Article 1017:** Clarifies the meaning of a "pro indiviso" call and introduces the "rule of earmarking."
- **Article 1018:** States the absolute rule for accretion in case of repudiation in legal succession.
- **Article 1019:** Governs the proportion in which the accruing share is inherited.
- **Article 1020:** Details the transfer of rights and obligations along with the accrued share.
- **Article 1021:** Provides the special and critical rule for accretion among compulsory heirs, distinguishing between the legitime and the free portion.
- **Article 1022:** Explains the consequence when accretion does not take place in testamentary succession.
- **Article 1023:** Extends the right of accretion to devisees, legatees, and usufructuaries.

A thorough understanding of these eight articles is essential to mastering the

application of the doctrine.

Part II: The Indispensable Requisites for Accretion

For the right of accretion to operate, a specific set of conditions must concur. These requisites, primarily outlined in Article 1016 for testamentary succession, act as a checklist; the absence of any one of them will prevent accretion from taking place.³

1. Plurality of Subjects

The most basic requirement is the existence of a plurality of successors. There must be at least two or more persons called to the same inheritance, devise, or legacy.¹⁴ If a testator institutes only a single heir, there is no "co-heir" to whom a vacant share could accrue. In such a case, if the sole heir's institution fails, the entire estate will pass by way of intestate succession, unless a substitute has been named.¹⁴

2. Unity of Object (Pro Indiviso Call)

This requisite demands that the successors be called to the same property or the same portion thereof *pro indiviso*, meaning in an undivided manner.³ This implies a collective institution where the heirs are not given individually determined and physically segregated parts of the inheritance. They are instituted as co-owners of the whole thing or of the designated fractional part. This concept is the most technical of the requisites and is further clarified by the "Rule of Earmarking" in Article 1017, which will be analyzed in detail in the next section.

3. Vacancy of Share

A share in the inheritance must become "vacant." The Civil Code explicitly recognizes three primary causes for such a vacancy in the context of accretion⁷:

- **Predecease:** The instituted heir, legatee, or devisee dies before the testator. Since succession rights are transmitted only at the moment of the decedent's death, a person who dies first acquires no rights to transmit.
- **Repudiation (or Renunciation):** An heir, legatee, or devisee who is capacitated to inherit formally and unequivocally rejects the inheritance. This must be done through a public or authentic instrument or by petition to the court.¹⁷
- **Incapacity:** An heir, legatee, or devisee is declared legally incapable or unworthy of succeeding. This can arise from various causes, such as being found guilty of an act of unworthiness under Article 1032 (e.g., attempting against the life of the

testator) or being subject to a specific legal prohibition (e.g., a guardian inheriting from a ward before the final accounts are approved).¹³

In addition to these three, legal scholars and jurisprudence recognize that the non-fulfillment of a suspensive condition attached to the institution of an heir also creates a vacancy, as the heir's right to succeed never materializes.¹⁰

While these causes are often grouped together, their legal effects are not uniform, particularly in their interaction with the right of representation. The law treats repudiation, a voluntary act of will, differently from predecease and incapacity, which are generally involuntary events. An heir who personally and willfully rejects an inheritance is deemed to have rejected it for their entire lineage; thus, they cannot be represented.¹¹ In contrast, when an heir is prevented from inheriting due to the involuntary circumstances of death or legal incapacity, the law, through the mechanism of representation, intervenes to protect their qualified descendants. This distinction in legal philosophy is fundamental to understanding why accretion's application differs significantly depending on the cause of the vacancy, especially in intestate succession.

Part III: Accretion in Testamentary Succession: Honoring the Testator's Intent

In testamentary succession, where a valid will exists, the application of accretion is guided by the primary objective of giving effect to the testator's intent, whether expressed or presumed.

The "Pro Indiviso" Call and the Rule on Earmarking (Article 1017)

Article 1017 is the interpretive key to understanding the crucial requisite of a *pro indiviso* call. It clarifies which testamentary dispositions are considered collective and which are considered specific, thereby determining whether accretion can occur. The operative concept is whether the testator has "earmarked" the shares.¹⁰

Accretion Applies (No Earmarking):

The right of accretion is not excluded by language that designates an aliquot or fractional part, such as "I leave my estate to A and B, one-half for each" or "I institute C, D, and E as my heirs in equal shares".⁸ Although fractions are mentioned, the testator has not assigned a specific, physically determinate portion of the property to each heir. The heirs are co-owners of the entire property in the proportions mentioned. The same rule applies to bequests of

money or other fungible goods where the shares are not specifically segregated or identified.¹⁰

- **Example:** A testator's will states, "I institute my friends, X and Y, as my heirs to my entire estate in equal shares." If X predeceases the testator, his one-half share will accrue to Y, who will then inherit the entire estate. The designation "in equal shares" does not constitute an earmarking that would prevent accretion.¹⁰

Accretion Does NOT Apply (With Earmarking):

Accretion is excluded if the testator's language clearly identifies and segregates the property each heir is to receive, making them the exclusive owner of a determinate thing. This is known as earmarking.

- **Example 1 (Physical Division):** A will provides, "I give to my brother, C, the northern half of my farm, and to my sister, D, the southern half of my farm." If C renounces his share, it will not accrue to D. The shares are clearly earmarked by physical description.¹⁰
- **Example 2 (Specific Items):** A will states, "I bequeath to my niece, E, my shares of stock in ABC Corp., and to my nephew, F, my shares of stock in XYZ Corp." If E is incapacitated to inherit, her legacy does not accrue to F. The items are distinct and specifically designated.
- **Example 3 (Specific Sources):** A legacy of "my money deposited in Bank A to G, and my money deposited in Bank B to H" is an earmarking. If G's legacy fails, it does not accrue to H.¹¹

Consequence of Earmarking: When a share is earmarked and becomes vacant, and the testator has not named a substitute, the vacant share does not accrue to the other co-heirs. Instead, **Article 1022** of the Civil Code dictates that this vacant portion shall pass to the **legal heirs** of the testator by way of intestate succession. The legal heirs will receive it subject to the same charges and obligations originally imposed by the testator.⁸

The Primacy of Substitution

As established, accretion operates on a presumed intent. This presumption is immediately defeated by an express declaration of the testator's will. The most common form of this express declaration is the appointment of a substitute heir. If the will provides for a substitute to take the share of an instituted heir in case of

predecease, repudiation, or incapacity, the substitute will inherit, and the right of accretion is completely blocked.⁷

- **Example:** "I leave my condominium unit to my friends, M and N, jointly. However, if M is unable or unwilling to receive his share, it shall go to P." If M renounces the inheritance, his one-half share in the condominium will pass to P (the substitute), not to N (the co-heir by accretion).¹⁴

Part IV: Accretion in Intestate Succession: The Default of the Law

When a person dies without a valid will (intestate), the distribution of their estate is governed by a strict order of preference and rules laid down by the Civil Code. In this context, accretion serves as a subsidiary mechanism, and its application is significantly modified by the paramount right of representation.

The Absolute Rule of Repudiation (Article 1018)

The application of accretion in intestacy is clearest and most absolute in the case of repudiation. Article 1018 states unequivocally:

"In legal succession the share of the person who repudiates the inheritance shall always accrue to his co-heirs." ⁸

This rule is absolute because the law provides that an heir who repudiates their inheritance cannot be represented by their own heirs.¹¹ Since the right of representation is unavailable, there is no superior right to block accretion. The act of repudiation is considered a purely personal decision that severs the line of inheritance for that heir's descendants. Consequently, the repudiated share is absorbed by the other legal heirs of the same degree who accept the inheritance.

- **Example:** D dies intestate, and his legal heirs are his two brothers, X and Y. If X repudiates his share, the entire inheritance will go to Y by right of accretion. X's children, if any, have no right to inherit from D because their father cannot be represented.¹⁴

The Primacy of Representation in Predecease and Incapacity

In stark contrast to the rule on repudiation, the right of representation takes precedence over the right of accretion in intestate succession when the vacancy is caused by **predecease** or **incapacity**.¹⁴ The law reflects a strong public policy to protect the direct descendants of an heir (and the children of the decedent's siblings in the collateral line), ensuring that the inheritance remains within the family bloodline whenever possible.

The right of representation is a legal fiction whereby the representative is raised to the place and degree of the person represented and acquires the rights which the latter would have had if he were living or could have inherited.¹⁹

- **Example:** D dies intestate, and his legal heirs are his two brothers, X and Y. X predeceases D, leaving a child, Z. In this case, X's one-half share does **not** accrue to his brother Y. Instead, Z will inherit X's share by "stepping into the shoes" of his father through the right of representation. Accretion is completely barred.¹¹ The same outcome would occur if X were alive but was legally incapacitated to inherit from D.

Part V: The Hierarchy of Rights: Key Limitations and Exceptions

To navigate the complexities of succession, it is essential to understand the established hierarchy of rights that determines how a vacant share is filled. Accretion is a fallback mechanism that applies only when superior rights are absent.

The ISRAI Hierarchy

A useful mnemonic for remembering the order of preference in filling a vacant testamentary disposition is **ISRAI** ¹⁰:

1. **Institution:** The heir originally named in the will.
2. **Substitution:** The substitute heir named by the testator, if any.
3. **Representation:** The right of representation, when proper (primarily in cases of predecease/incapacity of a compulsory heir).
4. **Accretion:** The right of accretion among co-heirs, if the requisites are met.
5. **Intestacy:** If none of the above apply, the share passes to the legal heirs.

The Special Rule for the Legitime (Article 1021)

One of the most nuanced and critical limitations on accretion concerns the **legitime**, which is that part of the testator's property that he cannot dispose of because the law has reserved it for certain heirs, called **compulsory heirs**.²¹ Article 1021 establishes a special regime for the legitime that distinguishes it from the free portion of the estate.⁸

No Accretion in the Legitime

The right of accretion, as a distinct legal concept, does not apply to the legitime itself.¹⁰ If a compulsory heir predeceases the testator, is incapacitated, or is disinherited, their legitime passes to their own children or descendants by right of representation. If a compulsory heir **repudiates** their legitime, the other compulsory co-heirs shall succeed to it **"in their own right" (*jure proprio*), and not by the right of accretion.**

This is a fine but important legal distinction. When a legitime is repudiated, the law does not "add" the vacant share to the others. Instead, the law re-computes the legitimes of the remaining compulsory heirs as if the repudiating heir had never existed in the first place. The result is an increase in their shares, but the mechanism is direct succession by law, not the subsidiary right of accretion.

Accretion in the Free Portion

While accretion does not operate on the legitime, it can take place among compulsory heirs with respect to the free portion of the estate (the part of the estate which the testator may dispose of freely).

- **Rule:** "Among the compulsory heirs the right of accretion shall take place only when the free portion is left to two or more of them, or to any one of them and to a stranger".⁸
- **Application:** If a testator institutes two or more compulsory heirs (e.g., his two children) to the free portion *pro indiviso*, and one of them cannot take their share of the free portion, that share will accrue to the other co-heir(s). The same applies if the free portion is given jointly to a compulsory heir and a stranger.¹⁰

Express Prohibition by Testator

The most straightforward exception is when the testator, in exercising their testamentary freedom, explicitly states in the will that accretion shall not occur.⁷ Such a provision overrides the default legal presumption and will be respected by the courts.

Comparative Analysis: Accretion vs. Representation in Intestacy

To distill the complex interaction between these two rights in intestate succession, the following table provides a clear, comparative summary:

Cause of Vacant Share	Does Representation Apply?	Does Accretion Apply?	Governing Principle
Predecease	Yes, if the heir has qualified descendants (in the direct descending line) or is a sibling of the decedent with children.	No, representation takes precedence.	The law protects the lineage by allowing descendants to "step into the shoes" of the predeceased heir. ¹⁹
Incapacity	Yes, if the heir has qualified descendants or is a sibling of the decedent with children.	No, representation takes precedence.	Similar to predecease, the law protects the descendants of an heir who is involuntarily prevented from inheriting. ¹⁸
Repudiation	No, an heir who repudiates their share cannot be represented.	Yes, the share accrues to the co-heirs of the same degree.	Repudiation is a personal act that severs the inheritance rights for that heir's entire line. The vacant share is absorbed by the remaining co-heirs. ⁵

Part VI: Application to Different Classes of Successors

The right of accretion applies broadly to all types of successors named in a will, but the analysis of its requisites can differ based on the nature of the succession right. To understand this, it is first necessary to define the classes of successors under Philippine law.¹²

- **Heirs:** These successors are called to the whole or to an aliquot (fractional) portion of the inheritance. They can be:
 - **Compulsory Heirs:** Those for whom the law reserves a portion (legitime) of the estate.²³
 - **Voluntary Heirs:** Those instituted by the testator in the will to inherit from the free portion of the estate.¹²
- **Legatees and Devisees:** These are successors called to specific and determinate items of property.
 - **Legatees:** Receive specific personal property (e.g., a car, jewelry, a sum of money).¹²
 - **Devisees:** Receive specific real property (e.g., a parcel of land, a house).¹²

Accretion Among Co-Devisees and Co-Legatees (Article 1023)

Article 1023 of the Civil Code expressly provides that:

"Accretion shall also take place among devisees, legatees and usufructuaries under the same conditions established for heirs."⁸

This means that for accretion to occur among legatees or devisees, the same core requisites must be met: a plurality of subjects, a vacancy of share, and, most importantly, a *pro indiviso* call to the same object.

The application of the *pro indiviso* requisite is where the distinction between heirs and legatees/devisees becomes critical. A voluntary heir is instituted to a conceptual fraction of the entire net estate, which is inherently undivided until the final partition. Thus, any two voluntary heirs are, by nature, called *pro indiviso* to the estate.

For legatees and devisees, however, they are called to specific items. Therefore, for

the "unity of object" requisite to be met, they must be called jointly to the **very same specific item**.

- **Example (Accretion Applies):** T's will states, "I give my beach house in Batangas to my friends, A and B." This is a joint devise of a single, specific property. If A predeceases T, the entire beach house will belong to B by right of accretion. The call is *pro indiviso*.
- **Example (Accretion Does Not Apply):** T's will states, "I give my house in Quezon City to A and my condominium in Makati to B." Here, A and B are devisees, but they are called to different, specific properties. There is no unity of object. If A's devise fails, the Quezon City house will not accrue to B; it will pass to T's legal heirs under Article 1022.

Part VII: Jurisprudence and Practical Application

Case Study: In re: Estate of Rodriguez vs. Lopez

The Supreme Court case of *In re: Estate of Rodriguez vs. Lopez* serves as a quintessential example of the application of accretion in testamentary succession.¹³

- **Facts:** The testator, Tomas Rodriguez, executed a will instituting his cousin, Luz Lopez de Bueno, and his guardian, Vicente F. Lopez, as his universal heirs to the entire estate. The institution was collective and did not specify shares, making it a *pro indiviso* call. The guardian, Vicente, died, and at the time of the will's execution and his death, his final accounts as guardian had not been approved. Under the Civil Code, a testamentary provision in favor of a guardian made by his ward before the approval of final accounts is invalid.¹³ This rendered Vicente legally incapacitated to inherit.
- **Issue:** Did the share of the incapacitated guardian, Vicente, accrue to the co-heir, Luz, or did it pass by intestacy to the testator's other legal relatives?
- **Ruling:** The Supreme Court held that the right of accretion was the proper remedy. All the requisites were present: (1) there was a plurality of heirs (Luz and Vicente); (2) they were called to the same inheritance *pro indiviso*; and (3) a share became vacant due to the incapacity of one of the heirs (Vicente). The Court ruled that the specific provisions on accretion must prevail over the general provisions on intestate succession.

- **Significance:** This landmark decision powerfully affirms that when heirs are instituted collectively to an undivided inheritance, and one is disqualified, the vacant share is absorbed by the surviving co-heir. It underscores that accretion is the mechanism intended by law to fulfill the testator's presumed desire to keep the property within the designated group, thereby preventing partial intestacy.¹³

Illustrative Scenarios

To further clarify the application of these rules, consider the following scenarios:

1. **The Earmarking Rule:** Testator T's will states: "I give to A my land in Laguna and to B my land in Cavite." B predeceases T. Does B's share accrue to A?
 - **Answer:** No. The properties are specifically earmarked. There is no unity of object. B's land in Cavite will pass to T's legal heirs by intestacy.¹⁰
2. **Substitution vs. Accretion:** T's will states: "I give my entire estate in equal shares to my friends A and B. If A cannot inherit, his share shall go to C." A repudiates the inheritance. Who gets A's share?
 - **Answer:** C gets the share. Substitution is an express declaration of the testator's will and is superior to the presumed will underlying accretion.⁷
3. **Representation vs. Accretion (Intestacy):** T dies without a will. His only heirs are his two brothers, A and B. A died before T, leaving a son, C. Who inherits T's estate?
 - **Answer:** B inherits one-half, and C inherits the other one-half. C inherits by right of representation, "stepping into the shoes" of his father, A. Representation is superior to accretion in intestate succession for cases of predecease.¹⁹
4. **Repudiation in Intestacy:** Same facts as above, but A is alive and repudiates his share. Who inherits?
 - **Answer:** B inherits the entire estate. An heir who repudiates cannot be represented. Therefore, accretion applies, and A's share is incorporated into B's share.⁵
5. **The Legitime and Free Portion:** T has two legitimate children, A and B. His net estate is ₱1,000,000. The legitime of A and B is ₱500,000 (₱250,000 each). The free portion is ₱500,000. T's will states: "I give the free portion of my estate to my children A and B in equal shares." A repudiates the entire inheritance (both

his legitime and his share in the free portion). How is the estate distributed?

○ **Answer:**

- **A's Legitime (₱250,000):** This is repudiated. It passes to B "in his own right," not by accretion. B now has a total legitime of ₱500,000.
- **A's Share in the Free Portion (₱250,000):** This was given *pro indiviso* to A and B. Since A repudiated it, this share **accrues** to B.
- **Final Distribution:** B receives the entire estate of ₱1,000,000. He gets ₱500,000 as his total legitime (his own plus A's, inherited in his own right) and ₱500,000 from the free portion (his own share plus A's, acquired by accretion).⁸

Conclusion: Synthesizing the Doctrine of Accretion

The right of accretion, or *jus accrescendi*, is a fundamental yet subsidiary right within the intricate framework of Philippine succession law. Its operation is not automatic but is contingent upon the strict concurrence of a plurality of successors, a vacancy in a share, and a collective, *pro indiviso* institution to the same inheritance. It stands as a default legal presumption, designed to honor the perceived intent of a testator to keep a bequest within a chosen group and to prevent the fragmentation of the estate through partial intestacy.

Its application, however, is carefully circumscribed by a clear hierarchy of rights. Accretion must always yield to the testator's express will, manifested through the appointment of a substitute, and to the overriding public policy protecting family lineage, embodied in the right of representation. The rules governing accretion also reveal a sophisticated legal philosophy, treating a voluntary act of repudiation more definitively than the involuntary circumstances of predecease or incapacity. Furthermore, the doctrine draws a critical distinction between the legitime of compulsory heirs—a legally mandated share where accretion proper does not apply—and the free portion of the estate, where it may operate freely if the requisites are met.

For individuals engaged in estate planning, a thorough understanding of accretion underscores the paramount importance of precise and unambiguous will-drafting. Relying on legal presumptions can invite conflict and litigation. A well-crafted will should not leave the disposition of a vacant share to the default rules of accretion or intestacy. Instead, it should explicitly state the testator's wishes, either by expressly invoking or prohibiting accretion and, most importantly, by providing for clear

substitution clauses. Doing so ensures that the testator's true intentions are honored, providing certainty for beneficiaries and minimizing the potential for disputes that can fracture familial relationships and erode the value of the very inheritance intended to provide for them.

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