PHILIPPINES

Mid-term Report - Review of the implementation of recommendations with respect to the rule of law and the role of lawyers partially accepted by Philippines during its Fourth UPR Cycle

Lawyers for Lawyers Foundation
Anthony Fokkerweg 61
1059 CP Amsterdam
The Netherlands
T +31 6 4286 7392
E info@lawyersforlawyers.org
W www.lawyersforlawyers.org

Word Count: 5501

About the Caravana Filipina

The Caravana Filipina is a fact-finding mission which sought to investigate extrajudicial killings and other gross human rights violations against legal professionals in the Philippines between 2016 and 2023. The cases examined by the Caravana Filipina relate primarily to lawyers, as well as judges and prosecutors. It is a joint initiative of 10 different lawyers' organisations from multiple countries.

About the organisations

Lawyers for Lawyers ('L4L') is an independent, non-political and not-for-profit lawyers' organization established in 1986. Our mission is to promote the independent functioning of lawyers and the legal profession across the world in accordance with internationally recognized norms and standards, including the United Nations Basic Principles on the Role of Lawyers. Our work to support lawyers who are at risk because of discharging their professional duties, seeks to protect them from threats, risks and reprisals, strengthens their international recognition and protection in laws, policies and practices, and empower them to fulfil their role as essential agents of the administration of Justice. Lawyers for Lawyers was granted special consultative status with the UN Economic and Social Council in July 2013.

The Law Society of England and Wales ('Law Society') is the professional body representing over 200,000 lawyers in England and Wales. Its purpose is to promote and support members of the legal profession, as well as to defend the rule of law and independence of the legal profession around the world. The Law Society has held special consultative status with the Economic and Social Council of the United Nations since 2014.

The International Bar Association ('IBA'), established in 1947, is the world's leading organisation of international legal practitioners, bar associations and law societies. The IBA influences the development of international law reform and shapes the future of the legal profession throughout the world. It has a membership of 80,000 individual lawyers and more than 190 Bar Associations and Law Societies, spanning all continents. In 1995, the IBA established its Human Rights Institute under the honorary presidency of Nelson Mandela. The IBA's Human Rights Institute (IBAHRI) is an autonomous and financially independent entity within the IBA, working with the global legal community to promote and protect human rights and the independence of the legal profession worldwide.

The International Observatory of Lawyers at Risk ('OIAD') is an initiative of the Conseil National des Barreaux (France), the Barreau de Paris (France), the Consejo General de la Abogacía Española (Spain), and the Consiglio Nazionale Forense (Italy). This Observatory was created with the aim of coordinating its work with third-party entities, networks, and mechanisms operating in the field of protection of the legal profession in general and human rights lawyers in particular. One of our areas of work is raising awareness of our colleagues' particularly high-risk cases by sending communications to the relevant authorities and international organizations and preparing amicus curiae briefs to support our position in potentially complex processes.

The Foundation Day of the Endangered Lawyer is an organisation committed to defend and assist lawyers who are threatened, attacked or murdered in various countries around the world because of their (human rights) work. The Foundation communicates with colleagues and organizations and maintains contact with other organizations that work on behalf of threatened lawyers, writes to authorities, attends trials and works on petitions. The Foundation supports colleagues who have fled to the Netherlands or Europe and brings them into contact with each other so that they can support each other.

The European Association of Lawyers for Democracy and World Human Rights ('ELDH') is a progressive, non-profit international organisation that brings together lawyers from 23 European countries. ELDH works to promote and defend human rights and civil liberties, social and economic rights, democracy, the rights of migrants and refugees, gender equality, minority rights, the right of peoples to self-determination, the right to development, peace, and accountability for war crimes and serious human rights violations. The organisation firmly opposes dictatorships, oppression of peoples, discrimination, racism, war, and all forms of human rights abuse. ELDH pursues its objectives through the organisation of international conferences, trial observations and human rights missions, including in the Basque Country, Colombia, Palestine, Turkey, Philippines and Western Sahara. It prepares legal opinions on international, European and human rights law, publishes statements and letters of protest to raise public and governmental awareness, and organises solidarity actions and advocacy campaigns. ELDH's current areas of focus include the impact of European anti-terrorism measures on fundamental rights, European Union treaties and policies, migration and asylum policies, the strengthening of international law, social and economic rights, labour rights under pressure from neo-liberal policies, data protection and the right to information, as well as ongoing human rights violations and struggles for self-determination in various regions.

Executive Summary

1. This review focuses on recommendations concerning the status and rights of lawyers in the Philippines. During the Fourth Cycle of the Universal Periodic Review (the 'UPR'), the Philippines received a total of 289 recommendations. Among these recommendations, 21 specifically related to the protection of human rights defenders, including lawyers; seven called for an end to "red-tagging" and for reforms to legislation underpinning the "war on drugs" and anti-terrorism laws; and 21 addressed increased accountability for extrajudicial killings and other grave human rights violations affecting lawyers and human rights defenders.

2. For the purposes of this report, the signatory organisations concentrate on three relevant areas:
    i. The independence of lawyers as a foundation for the rule of law
    ii. Patterns of human rights violations against lawyers
    iii. Accountability for violations committed against lawyers

3. This submission presents the signatory organisations' findings on the Philippines' implementation of these recommendations, drawing on their ongoing work in the country, including the *Caravana Filipina* fact-finding mission conducted in 2024. The findings indicate that the Philippines has not adequately implemented the accepted recommendations. Authorities have failed to take action to ensure that lawyers can perform their professional duties freely, without intimidation, hindrance, harassment, or improper interference. Documented incidents of violence against legal professionals form part of a broader, systematic effort to suppress lawyers working to uphold human rights and the rule of law. Practices such as surveillance, intimidation, red-tagging, lawfare, and extrajudicial killings persist, creating a chilling effect that extends to the wider legal profession.

4. The signatory organisations therefore call on the Philippine authorities to take urgent action to protect lawyers, implement the UPR recommendations in full, end the practice of red-tagging, review and amend anti-terrorism and related legislation, and ensure accountability for violations committed against legal professionals.

I. Introduction

5. Lawyers for Lawyers, the Law Society of England and Wales, the International Bar Association's Human Rights Institute, International Observatory of Lawyers at Risk, Foundation Day of the Endangered Lawyer and the European Association of Lawyers for Democracy and Human Rights (hereinafter: the 'signatory organisations') submit this report to address the human rights performance of the Philippines with respect to the rule of law and the role of lawyers in the context of the Fourth Cycle of the Universal Periodic Review (the 'UPR'). The Report of the Working Group on the UPR dated 28 December 2022[1] (the 'Report') contains recommendations with respect to the rights of human rights defenders, including lawyers,[1] in the Philippines. The addendum to the UPR Report dated 14 February 2023[2] (the 'Addendum') sets out the views of the Philippines on conclusions and/or recommendations, voluntary commitments, and replies. On 27 March 2023, at its fifty-second session, the Human Rights Council considered and adopted the outcome of the review of the Philippines.[3]

6. For the purposes of this mid-term review, the signatory organisations focus on recommendations relating specifically to the freedom, independence, and safety of lawyers. During its Fourth UPR cycle, the Philippines partially accepted:

a. 21 recommendations[4] concerning the protection of human rights defenders, including lawyers.[5]
   These recommendations call for a safe and enabling environment for their work, as well as guarantees ensuring the unrestricted exercise of their professional duties and respect for their human rights. Representative recommendations include:
   i. *Take all the necessary measures to provide adequate protection to lawyers, human rights defenders, journalists and media workers, in particular regarding enforced disappearances and extrajudicial killings (145.77 - Estonia);*
   ii. *Promote a safe and enabling environment for human rights defenders, including by promoting their legitimacy and importance, and ensuring that they are not subject to arbitrary arrest or detention (145.82 - Norway);*

b. Within the broader context of State obligations to protect human rights defenders, the Philippines also received seven recommendations[6] calling for an end to the practice of "red-tagging", for a review of legislation underpinning the "war on drugs," and for amendments to bring anti-terrorism laws in line with international human rights standards. Representative recommendations include:
   i. *End the practice of "red-tagging" and ensure the protection of human rights defenders from arbitrary arrest, harassment and other human rights abuses, including by adopting the human rights defenders protection act (146.60 - United States of America);*
   ii. *Bring the Act to Prevent, Prohibit and Penalize Terrorism into line with international human rights standards, and pass the human rights defenders protection law (146.64 - Mexico);*

[1] Report of the Working Group on the Universal Periodic Review, 28 December 2022, A/HRC/52/13.
[2] A/HRC/52/13/Add.1.
[3] Decision adopted by the Human Rights Council on 27 March 2023, 6 April 2023, A/HRC/DEC/52/110
[4] Please be referred to recommendations 145.76, 145.77, 145.78, 145.79, 145.80, 145.81, 145.82, 145.84, 145.194, 145.195, 146.31, 146.33, 146.35, 146.40, 146.43, 146.60, 146.68, 146.74, 146.75, 146.76, and 146.77
[5] The Special Rapporteur on the Independence of Judges and Lawyers has stated that: "when acting on behalf of their clients in defending their human rights and fundamental freedoms, lawyers should also be regarded as human rights defenders". See: Report of the Special Rapporteur on the independence of judges and lawyers, 22 August 2016, A/71/348, par. 35.
[6] See recommendations 146.53, 146.60, 146.61, 146.62, 146.63, 146.64, and 146.69.

iii. *End the practice of "red-tagging" groups and individuals (146.62 - Sweden);*

c. 19 recommendations[7] relating to increased accountability for perpetrators of extrajudicial killings and other grave human rights violations, and three recommendations[8] specifically aimed at ensuring accountability for violations committed against human rights defenders, including lawyers. A key example includes:

i. *Ensure prompt, independent and impartial investigations of all instances of extrajudicial killings, enforced disappearances, torture, and arbitrary arrests and detention of persons suspected of drug-related offences, journalists, lawyers, human rights defenders and civil society actors (145.66 - Latvia).*

7. Consistent with these partially accepted recommendations, this review focuses on three principal areas:

i. The independence of lawyers as a foundation for the rule of law
ii. Patterns of human rights violations against lawyers
iii. Accountability for violations committed against lawyers

8. The signatory organisations welcome the partial acceptance of the recommendations listed above. Of the 289 recommendations received, 215 were accepted by the Philippines and 74 were noted.[9] This broadly indicates that the Government committed itself, *inter alia*, to conducting independent investigations into alleged human rights violations, including allegations of extrajudicial killings; to protecting human rights; and to further expanding access to justice. However, as stated by the signatory organisations in a joint statement delivered during the fifty-second session of the Human Rights Council, serious concern remains regarding the lack of support for recommendations addressing the practice of red-tagging.[10] Additionally, our organisations note with concern that the accepted elements of these recommendations have not been fully implemented as of the date of this submission. Further details and analysis are provided below.

II. Methodology

9. The signatory organisations have monitored the situation of lawyers in the Philippines for many years. As part of this work, they participated in the *Caravana Filipina*, a fact-finding mission on extrajudicial killings and other serious human rights abuses against legal professionals in the Philippines in the period between 2016 and 2023.[11] The report of the *Caravana Filipina* is based on a combination of desk research and fieldwork conducted in Metro Manila, Cordillera, Iloilo, and Cebu in June 2024. This included testimonies from 22 lawyers, three judges or former judges, and 13 family members or relatives of lawyers who were killed. The Delegation also conducted a series of meetings with representatives of the Supreme Court of the Philippines, the Commission on Human Rights' Office of the Executive Director and Regional Office VI, the Integrated Bar of the Philippines, forensic and academic institutions, and national and local civil society organisations, including, among others, the National Union of Journalist of the Philippines, Karapatan, the Visayas Community Law Centre, and the Cordillera Peoples Alliance.

---

[7] See recommendations 145.43, 145.44, 145.45, 145.46, 145.47, 145.48, 145.49, 145.56, 145.59, 145.60, 145.62, 145.63, 145.64, 145.65, 145.67, 145.68, 145.69, 145.70, and 146.65.

[8] See recommendations 145.61, 145.66, and 145.71.

[9] Report of the Human Rights Council on its fifty-second session, 19 February 2024, A/HRC/52/2, p. 905.

[10] Report of the Human Rights Council on its fifty-second session, A/HRC/52/2, 19 February 2024, p. 937.

[11] The Caravana Filipina full report *"Robes, Red Targets: the report on extrajudicial killings and other human rights violations against legal professionals*" can be found here: https://www.lawyersforlawyers.org/wp-content/uploads/2025/06/CARAVANA-FILIPINA-2024-pages.pdf

10. Informed consent was obtained from individuals mentioned in this report.

III. Assessment of the implementation of the recommendations

i. The independence of lawyers as a foundation for the rule of law

11. The adequate protection of human rights and fundamental freedoms requires that every individual has effective access to justice, legal assistance, and legal representation. Such assistance and representation can only be provided effectively in a judicial system where lawyers, along with judges and prosecutors, are able to carry out their professional activities independently and without external pressures and interference. This principle is enshrined in various international instruments, including the International Covenant on Civil and Political Rights ('ICCPR'), ratified by the Philippines in 1986, and the United Nations Basic Principles on the Role of Lawyers (the 'Basic Principles').[12]

12. In its task of promoting and ensuring the proper role of lawyers, the government of the Philippines should respect the Basic Principles and take them into account within the framework of its national legislation and practice. Adherence to the Basic Principles is considered a fundamental pre-condition for fulfilling the requirement that all persons have effective access to legal assistance and representation.

13. However, information collected by the signatory organisations demonstrate that the partially accepted recommendations have not yet been implemented and that in practice, the Philippines does not uphold safeguards necessary to ensure the proper functioning of the legal system and the role of lawyers. Reported cases show a significant persistence in attacks against lawyers, as well as the lack of investigation into, and accountability for, such crimes.

ii. Patterns of human rights violations against lawyers

14. The research conducted by the *Caravana Filipina* has found that legal professionals are subjected to threats, harassment and even lethal attacks. These violations appear to form part of a systematic effort to suppress lawyers who are long-standing members of lawyers' unions or associations and who have dedicated their practice to upholding the rule of law and defending human rights. Their work, including the representation of victims of the "war on drugs", religious and Indigenous minorities, farmers, workers, human rights defenders, journalists, and other marginalised groups, has rendered them targets of repression. The pattern of violations identified includes surveillance and intimidation, red-tagging, lawfare, and the extrajudicial killing of legal professionals, often occurring in this sequence.[13]

15. While attacks peaked during the term of former President Rodrigo Duterte from 2016-2022, they continued under the current administration of President Ferdinand Marcos Jr. The National Union of Peoples' Lawyers ('NUPL') reported that, by the end of 2024, a total of 45 profession-related attacks and threats against lawyers and judges had occurred, comprising four

[12] The UN Basic Principles on the Role of Lawyers provide a concise description of international norms relating to the key aspects of the right to independent counsel. The Basic Principles were unanimously adopted by the Eighth United Nations Congress on the Prevention of Crime and the Treatment of Offenders in Havana, Cuba on 7 September 1990. Subsequently, the UN General Assembly "welcomed" the Basic Principles in their 'Human rights in the administration of justice' resolution, which was adopted without a vote on 18 December 1990 in both the session of the Third Committee and the plenary session of the General Assembly.
[13] Caravana Filipina, Black robes, red targets, Report of a Fact-Finding Mission on Extrajudicial Killing and other Gross Human Rights Violations against Legal Professionals in the Philippines between 2016 and 2023, June 2025,pp. 8-9.

killings and 41 other forms of attacks and threats.[14] These incidents targeted 34 lawyers, a majority of whom were working predominantly on human rights and public interest cases. The following paragraphs illustrate the persistence of these trends following the adoption of the UPR outcome, organised by type of attack.

a. Surveillance, intimidation and red-tagging

16. Surveillance has been observed as the first step in attempts to intimidate legal professionals and pressure them to not represent certain clients, withdraw specific actions, or cease speaking publicly about their clients' cases or causes. Surveillance of lawyers handling human rights cases has become so widespread that it has been described as an "occupational hazard".[15]

17. "Red-tagging" is the labelling of individuals or organisations as communists or terrorists, without substantial proof of any unlawful conduct, without due process of law, and regardless of their actual political beliefs or affiliations. In the Philippines, red-tagging takes the form of vicious smear campaigns on social media and in public spaces labelling individuals as "communist rebels", "terrorists" or members or affiliates of the Communist Party of the Philippines ('CPP'), the New People's Army ('NPA'), or the National Democratic Front of the Philippines ('NDFP'). The *Caravana Filipina* has found red-tagging to be a significant factor in attacks on legal professionals, with lawyers being red-tagged merely for fulfilling their legitimate professional duties. This frequently stems from lawyers being identified with their clients or their clients' causes, in violation of the Basic Principles.[16] In other cases, red-tagging is used to target lawyers in an effort to discredit the individuals or organisations that they represent, and even to deprive them of legal representation.

18. The Anti-Red-Tagging Monitoring Project implemented by the Ateneo Human Rights Center has collected information of 456 incidents of red-tagging between January and June 2024.[17] In 2025, the National Union of Peoples' Lawyers ('NUPL') monitored 28 incidents of red-tagging, 23 of which involved NUPL members.[18]

National Union of People's Lawyers

Lawyers and other members of the **National Union of People's Lawyers** ('NUPL') have repeatedly been targeted with threats to life, liberty, and security through killings, violent attacks, red-tagging, and surveillance. As stated by UN Special Procedures mandate holders, these acts appear to be directly connected to NUPL members' efforts as legal workers protecting the rights of marginalised communities.[19]

A recent case illustrating this pattern is that of **Atty. Maria Kristina Conti**, a human rights lawyer who has provided legal assistance to victims of human rights violations in the context of the ¨war on drugs¨ and recently registered as Assistant to Counsel at the International Criminal Court ('ICC') with a potential role in the proceedings related to former President

[14] NUPL, Annual report on attacks on lawyers & judges, 2024.
[15] Ibid., p. 28.
[16] Principle 18.
[17] Ateneo Human Rights Center (AHRC), 'Anti-Red-Tagging Monitoring Project' https://ahrc.org.ph/anti-red-tagging-monitoring-dashboard/.
[18] NUPL, Report on Attacks on Lawyers (*as of October 2025*).
[19] Margaret Satterthwaite and Fionnuala Ní Aoláin, 'Mandates of the Special Rapporteur on the independence of judges and lawyers and the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism' (15 June 2023, Ref.: AL PHL 2/2023) <https://spcommreports.ohchr.org/TMResultsBase/DownLoadPublicCommunicationFile?gId=28162>

Duterte. Since Duterte's arrest on an ICC warrant in March 2025, Atty. Conti has faced an alarming escalation of threats. She has been subjected to red-tagging, vilification, malicious online attacks, and anonymous threats directed at both herself and her family. This concerted campaign appears to be a direct reprisal for her legitimate work as a lawyer and her engagement with international accountability mechanisms. These acts not only endanger Atty. Conti but are clearly intended to silence her and deter others from carrying out human rights-related legal work in the Philippines[20].

NUPL has also recently documented an incident demonstrating the extension of red-tagging into judicial proceedings. In a case handled by NUPL lawyers before a Regional Trial Court in Metro Manila, a document purporting to list 'underground mass organisations and front organisations' of the CPP–NPA–NDF, and explicitly naming NUPL, was submitted to the court. The document bore official markings and originated from the National Task Force to End Local Communist Armed Conflict ('NTF-ELCAC'). [21]

b. Lawfare

19. Lawfare is used against Filipino lawyers to deter them from carrying out their work and defending particular cases of clients. The *Caravana Filipina* has shown that this tactic includes: the issuance of arbitrary arrest warrants, raids of offices and homes, the planting of evidence and arbitrary arrests or judicial harassment, occasionally leading to convictions. This form of harassment is often based on anti-terrorism legislation such as the Terrorism Financing Prevention and Suppression Act of 2012, Executive Order 68 of 2018 and the Anti-Terrorism Act of 2020.[22] Additionally, lawyers targeted by lawfare are commonly accused of non-bailable offences such as murder, human trafficking, possession of weapons and explosives, and financing of terrorism. Such tactics lead to different outcomes including legal professionals having to stop their practice of the law, go into hiding for extended periods of time or flee the country to avoid unfair prosecutions and convictions.

20. Arbitrary search warrants are frequently issued without proper judicial scrutiny and on the basis of dubious, vague, or fabricated information. Such warrants enable authorities to search homes and offices and to arrest individuals under questionable circumstances. Some courts, particularly in Metro Manila, have issued so-called 'template' search warrants that have been repeatedly used in police and military operations, often resulting in deadly raids. Legal professionals have been targeted through similar methods, with police officers visiting lawyers' homes under false pretences in order to inspect the premises and monitor those present. The delegation also received reports of search warrants being used against legal professionals as a pretext for harassment and arbitrary arrest. These warrants were often executed without adherence to international standards safeguarding the confidentiality of lawyer–client communications, including the procedural protections required during searches of lawyers' offices and homes where work-related documents are kept. Furthermore, credible information indicates that law enforcement agents have used search warrants as a pretext to plant evidence, most commonly firearms or explosives, the latter being preferred as bail is less likely to be granted for their illegal possession.

21. Despite claims that the "war on drugs" initiated by his predecessor will have a "new face" aimed at drug rehabilitation, the current government has not rescinded the executive orders that provide overbroad authority to the police to conduct anti-drug raids and operations under

[20] Lawyers for Lawyers, Concern over the harassment and threats targeting human rights lawyer Maria Kristina Conti - Lawyers for Lawyers, 15 May 2025.
[21] NUPL, Letter addressed to the Supreme Court of the Philippines, 5 December 2025,
[22] Caravana Filipina, Black robes, red targets, Report of a Fact-Finding Mission on Extrajudicial Killing and other Gross Human Rights Violations against Legal Professionals in the Philippines between 2016 and 2023, June 2025, pp. 33-39.

procedures that effectively facilitate lawfare and extrajudicial executions.

The *Caravana Filipina* met with lawyers criminalised under Section 8(ii) of the Philippine Terrorism Financing Prevention and Suppression Act of 2012 (Republic Act No. 10168) for allegedly financing terrorist groups. The misuse of the anti-terror legislative framework was initiated under Duterte's regime as a new form of attack against red-tagged civil society organisations and their members or staff. Convictions and ongoing prosecutions of human rights defenders under the same legislative framework continue, including through Executive Order 68 of 2018 and the controversial Anti-Terrorism Act of 2020, which gives security forces the power to arrest and detain suspects for up to 24 days without a warrant or charge.

c. Extrajudicial killings

22. Extrajudicial killings perpetrated against lawyers is often preceded by surveillance, intimidation and red-tagging.[23] These attacks tend to be premeditated, organised and follow a specific *modus operandi*: perpetrators often attack in pairs, ride motorcycles which are unregistered, hide their faces with helmets of baklavas and exit the scene rapidly. At the same time a level of disregard for being caught has been identified as attacks often occur in broad daylight with CCTV cameras and witnesses present at the time of the crime. The following cases further illustrate the persistence and consistency of these patterns:

> **Atty. Maria Saniata Liwlliwa Gonzales Alzate**, a 48-year-old Filipino human rights lawyer, was brazenly assassinated in broad daylight on 14 September 2023, in front of her residence in the city of Bangued, in the Cordillera region.[24] At approximately 4:55 pm, Atty. Alzate was parking her white Mitsubishi Mirage G4 when two men on a motorcycle approached. One of them, wearing a black cap, shot her six times at close range through the driver's window.[25] After briefly walking away, the gunman returned and fired two more shots before fleeing. The motorcycle used in the attack was later found abandoned in a ravine. Atty. Alzate was rushed to Dr. Petronilo V. Seares Sr. Memorial Hospital but was declared dead shortly after.
>
> At the time of her killing, Atty. Alzate was a highly respected figure in the legal community, known for her fearless commitment to human rights and justice. She had served as Commissioner of Bar Discipline since 2015 and twice as president of the Northern Luzon Chapter of the Integrated Bar of the Philippines ('IBP'). Much of her work involved providing pro bono legal services in high-profile and sensitive cases. Notably, she had recently secured a landmark court ruling in favour of a victim of police abduction and torture, resulting in the issuance of a writ of amparo and protective orders. She also served as private prosecutor in a case involving a barangay chairman accused of murdering a schoolteacher.
>
> Recent cases exhibiting a similar modus operandi include the killing of a lawyer who was shot by unidentified assailants upon returning home on 17 September 2025, as well as the ambush killing of another lawyer on 11 December 2025. In response to these incidents, the Integrated Bar of the Philippines issued statements calling for transparent, prompt, and impartial

[23] In June 2023, the Supreme Court in *Deduro v. Vinoya* specifically recognised the link between red-tagging and the violation of human rights, such as the right to life, liberty and security, but also specifically the link between red-tagging and extrajudicial killings:*'A likely precursor to abduction or extrajudicial killing. Being associated with communists or terrorists makes the red-tagged person a target of vigilantes, paramilitary groups or even State agents. Thus, it is easy to comprehend how a person may, in certain circumstances, develop or harbour fear that being red-tagged places his or her life or security in peril'.*

[24] Jairo Bolledo, 'Murder case recommended vs suspect in slay of lawyer who aided drug war victims' 15 September 2023, ttps://www.rappler.com/philippines/murder-case-recommended-suspect-killing-abra-lawyer-aided-drug-war-victims/

[25] Zacarian Sarao, 'Why she was targeted? Cops dig into Abra lawyer slaying', 15 September 2023, https://newsinfo.inquirer.net/1832028/why-was-she-targeted-motive-sought-in-abra-lawyer-slaying.

investigations into the attacks.[26]

iii. Accountability for violations committed against lawyers

23. The *Caravana Filipina* observed a consistent pattern of incomplete and inadequate investigations into killings and physical attacks against legal professionals. These investigations fail to comply with international legal standards, which require that investigations be prompt; effective and thorough; independent and impartial; and transparent. With one exception, none of the killings of the legal professionals examined by the *Caravana Filipina* have proceeded to trial. Instead, many instances of physical attacks and extrajudicial killings have been classified as "cold cases" in the early stages of investigation, preventing a trial from taking place and thereby halting efforts to bring perpetrators to justice and offer remedies to victims and their families.

24. Significant structural deficiencies in the investigative framework have been identified. Chief among these is the absence of a specialised and independent prosecutorial body mandated to investigate cases in which State officials may be implicated as potential perpetrators. Investigations are further undermined by a lack of transparency, exacerbated by Executive Order No. 2 (2016), which expands the grounds on which police records may be withheld from families, journalists, and oversight bodies, thereby impeding scrutiny and accountability.

25. The Caravana also found that there is a lack of a scientific method in evidence collection during investigations, which severely affects this process. Evidence is often also dependent on the voluntary cooperation of individuals as CCTV footage held by private individuals can only be collected with their consent. Moreover, crime scene contamination and the lack of ballistic examinations have been found to occur during investigations, while the lack of public access to the government firearms repository or ammunition administration system further undermines the investigative process and the justice system as a whole.[27] The efficacy of investigative procedures is also severely weakened by the lack of witness testimony, which stems primarily from two factors: first, authorities' failure to proactively seek witness statements; and second, structural flaws in the Philippines' Witness Protection, Security and Benefit Program (WPSBP), which leave potential witnesses vulnerable to intimidation and retaliation.

26. The recovery and handling of human remains from crime scenes similarly falls far below international standards. The Philippines lacks dedicated public morgues, and bodies are typically transferred directly from crime scenes to private funeral parlours. This practice undermines forensic integrity and often precludes initial examinations prior to embalming. Mis-certification of death is frequent, and families are commonly asked by funeral parlours to sign waivers pledging not to pursue legal action or request further investigation. There are only two trained forensic pathologists in the country, and no formal training in forensic pathology is available domestically, leading to a critical shortage of qualified professionals. There is no legal requirement for autopsies in cases of suspicious or violent deaths, and as a result, autopsies are rarely performed. Reports of fabricated autopsies have also been recorded.

IV. Conclusion and recommendations

27. As outlined in this report, the Philippines has not sufficiently implemented

[26] Official Statement of the Integrated Bar of the Philippines, 20 September 2025, https://www.facebook.com/photo/?fbid=1130287285788690&set=pcb.1130287495788669; Official Statement of the Integrated Bar of the Philippines, 11 December 2025, https://www.facebook.com/photo?fbid=1195034255980659&set=a.594321509385273

[27] Caravana Filipina, Black robes, red targets, Report of a Fact-Finding Mission on Extrajudicial Killing and other Gross Human Rights Violations against Legal Professionals in the Philippines between 2016 and 2023, June 2025, p. 65.

recommendations concerning the protection of lawyers. This report documents a significant increase in attacks against legal professionals, particularly those handling terrorism- and drug-related cases, and deplores the lack of investigation into, and accountability for, these crimes. Clear evidence indicates that red-tagging and other forms of repression have severely hindered lawyers' ability to work freely and independently. These pressures have generated a wider chilling effect on the legal profession, manifesting in self-censorship, fear of reprisal, and a reduced willingness among lawyers to take on cases related to human rights or political dissent. Consequently, the quality of the justice system has been compromised, and access to justice has been adversely affected.

28. This chilling effect is evident even at the early stages of legal careers. In particular, soon-to-graduate and recently qualified lawyers have expressed wariness about engaging in human rights work, often self-censoring to avoid red-tagging and feeling compelled to maintain a low profile. Beyond the targeting of lawyers themselves, these patterns of repression indirectly impact the individuals and groups they represent, thereby undermining clients' access to legal assistance and justice.

29. The signatory organisations therefore urge the Philippines to take the following measures:

i. **Ensure the independence and protection of lawyers**: Respect the right of lawyers to perform their professional functions without intimidation, hindrance, harassment, or improper interference, and guarantee that lawyers are not subjected to human rights violations, including surveillance, intimidation, red-tagging, lawfare, or extrajudicial killings. In doing so, the Philippines should act in accordance with Principles 16(a) and (c), 17 and 18 of the United Nations Basic Principles on the Role of Lawyers (the 'Basic Principles'). This includes implementing UPR recommendations 145.76, 145.77, 145.78, 145.79, 145.80, 145.81, 145.82, 145.84, 145.194, 145.195, 146.31, 146.33, 146.35, 146.40, 146.43, 146.60, 146.68, 146.74, 146.75, 146.76, and 146.77.

ii. **End red-tagging and review relevant legislation**: Implement UPR recommendations 146.53, 146.60, 146.61, 146.62, 146.63, 146.64, and 146.69, calling for an end to the practice of red-tagging and for a review of legislation underpinning the "war on drugs", as well as amendments to bring anti-terrorism laws into line with international human rights standards.

iii. **Ensure accountability for violations**: Implement recommendations 145.43, 145.44, 145.45, 145.46, 145.47, 145.48, 145.49, 145.56, 145.59, 145.60, 145.61, 145.62, 145.63, 145.64, 145.65, , 145.66 145.67, 145.68, 145.69, 145.70, 145.71 and 146.65 relating to increased accountability for perpetrators of extrajudicial killings and other grave human rights violations, including those specifically aimed at ensuring accountability for violations committed against human rights defenders, including lawyers.