



COMMISSION ON HUMAN RIGHTS OF THE PHILIPPINES
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**COMMENTS ON THE CONCLUDING OBSERVATIONS OF THE
COMMITTEE ON THE ELIMINATION OF DISCRIMINATION AGAINST WOMEN
(CEDAW/C/PHL/CO/5-6)**

INTRODUCTION

This report was produced by the Commission on Human Rights of the Philippines (“CHRP” or “Commission”), a national human rights institution (“NHRI”) having “A”-status accreditation with the International Coordinating Committee of National Institutions for the Promotion and Protection of Human Rights (“ICC”).¹

The report includes information gathered from local consultations with CSOs/NGOs;² the Commission’s national inquiry on Reproductive Health Rights with fifteen (15) regional consultations³ on CEDAW and Magna Carta of Women with Special Focus on reproductive health (“RH”); and five (5) fact finding missions and public hearings conducted in the National Capital

¹ See ICC, Report and Recommendations of the Session of the Sub-Committee on Accreditation, 26-30 March 2012 at pp. 24-26. Available at <http://nhri.ohchr.org/EN/AboutUs/ICCAccreditation/Pages/SCA-Reports.aspx>.

² In Focus: Women Migrant Workers, Persons with Diverse SOGIE and the CMW Concluding Comments (8 December 2015), in partnership with the Center for Migrants’ Advocacy and UN Women; Forum on Human and Labor Trafficking (19 March 2016), in partnership with the Migrant Heritage Commission and the Philippine Embassy in Washington, D.C.

³ The 15 regional offices of the CHRP conducted “Regional Consultation on CEDAW and Magna Carta of Women with special focus on Reproductive Health” within their areas of jurisdiction the whole month of March 2016. The consultations covered: Access to Justice and VAW; Issues of Women in Marginalized sectors; Issues in relation to displacement and development aggression, and last, the reproductive health and rights. The consultations gathered a total of 551 individuals including 33 indigenous peoples, 32 persons with disabilities, and 27 LGBTs.

Region (April 6-8), Legaspi-Sorsogon (April 12-13), Zamboanga City (April 13-15), Tacloban-Leyte-Samar (April 22-25), and Cagayan de Oro-Bukidnon (April 27-29).

The Committee on the Elimination of Discrimination against Women (“Committee”) welcomes written submission from national human rights institutions,⁴ not to exceed 10 pages in length,⁵ to be transmitted “3 weeks before the beginning of the session” of the Committee.⁶ Consideration of the Philippine periodic report is scheduled for the 64th session on 5 July 2016, so the deadline for submission by the CHRP is on 10 June 2016.⁷

The CHRP submits this report to the secretariat for distribution to the Committee and uploading on the official website of the Office of the High Commissioner for human Rights. It discusses developments in relation to the latest Concluding Observations of the Committee, as well as replies of the State Party to the list of issues.

COMMENTS ON CEDAW/C/PHL/CO/5-6

On systematically reviewing and revising all legislation to achieve full compliance with the provisions of the Convention. (para. 12)

1. Within three (3) years of the effectivity of the Magna Carta of Women (“MCW”), the State Party is required to “take steps to review and, when necessary, amend and/or repeal existing laws that are discriminatory”.⁸ This notwithstanding, **aberrations in law still exist**.
2. **The Commission regrets the insistence of the State Party that there is no conflict between the MCW**, which “respects the cultural identity and integrity of women”, **and the Code of Muslim Personal Laws**, which “the Muslim population views [...] as having primacy over civil law due to its basis in the Qu’ran.”⁹
3. Even though the State Party asserts that “[p]ractices such as polygamy and child marriages are now strongly discouraged”,¹⁰ the Code of Muslim Personal Laws allows Muslim men to have, legally, up to four (4) wives at a time,¹¹ and to marry girls as young as 12 years of age.¹² This has already been a matter of concern to this Committee.¹³

⁴ See Committee on the Elimination of Discrimination against Women, Rules of Procedure, Rule 47, *reprinted in* HRI/GEN/3/Rev.3 at 109.

⁵ Committee on the Elimination of Discrimination against Women, Participation by NHRIs, Part. IV.

⁶ *Id.*, Part V.

⁷ *Id.*

⁸ MCW, Republic Act.No. 9710 (August 14, 2009), sec. 12.

⁹ CEDAW/C/PHL/Q/7-8/Add.1, para. 2.1.

¹⁰ *Id.*

¹¹ Presidential Decree No. 1083 (February 4, 1977), art. 27.

¹² See *id.*, art. 16(2).

¹³ See CEDAW/C/PHL/Q/6, para. 2. See also CEDAW/C/SR.747(A), para. 18 (Schöpp-Schilling). See, further, CEDAW/C/SR.748(A), para. 38 (Bokpé-Gnacadjá) and para. 43 (Gaspard).

4. Moreover, despite the passage of the MCW in 2009, the provision that “[a]ny female commissioned officer or enlisted woman who contracts marriage [...] while in the active service shall be automatically separated unless she has, at that time of said marriage, already completed at least three (3) years of continuous active military service in the Armed Forces of the Philippines;”¹⁴ remains in place.
5. The Committee may wish to urge the State Party to strictly implement its obligation to amend and, if necessary, repeal, all legislation that contravenes the MCW and the Convention.

On strengthening of the national machinery for the advancement of women (para. 14) and access to justice and legal complaints mechanisms (See CEDAW/C/PHL/7-8, para. 46)

6. The Magna Carta of Women designates the Philippine Commission on Women (“PCW”) as “the primary policy-making and coordinating body of the women and gender equality concerns” and “the overall monitoring body [...] to ensure the implementation of [the MCW].”¹⁵
7. The MCW also designates the CHRP as the country’s Gender Ombud and sharing the monitoring function with the PCW.¹⁶ The Commission must work, through its Women’s Human Rights Center,¹⁷ towards facilitating access to justice¹⁸ and assist in the filing of cases.¹⁹
8. Since the passage of the Magna Carta of Women in 2009, the CHRP has rendered 2,394 instances of legal assistance and/or investigation in response to human rights violations against women. **Specific to violations of the MCW, it has received 49 complaints and requests for assistance and resolved 10 complaints for violation.** In 2015, it developed and published the gender ombud guidelines, including its protocols.
9. However, **findings of the CHRP regarding MCW violations are merely recommendatory** on the Civil Service Commission and/or the Department of the Interior and Local Government.²⁰ Resolutions of the Commission recommending the filing of administrative or criminal charges against erring individuals are referred to appropriate agencies for action. It has been the Commission’s experience that these agencies fail to take action on these resolutions or, worse, refer the case back to the Commission.
10. The Committee may wish to recommend that the State Party pass amendatory legislation that would make the findings of the CHRP binding on the government agency tasked with meting out penalties for violations of the MCW.

¹⁴ See Presidential Decree No. 1910 (March 22, 1984), sec. 1.

¹⁵ See MCW, Republic Act. No. 9710 (August 14, 2009), sec. 38.

¹⁶ *Id.*, sec. 39(a).

¹⁷ See *id.*, sec. 39(b).

¹⁸ *Id.*, sec. 39(c).

¹⁹ *Id.*, 39(d).

²⁰ *Id.*, sec. 41. See also MCW, Republic Act. No. 9710 (August 14, 2009), sec. 39(e).

11. The Committee may also wish to recommend that the State Party publicly report on how it responds to resolutions and advisories of the CHRP as gender ombud, including specific actions taken on:
- a) the dismissal of women faculty due to pregnancy pending before the Office of the Ombudsman;
 - b) the case of flight attendants who are victims of discrimination based on age and sex;²¹ and
 - c) the case of a minor discriminated due to her sexual orientation but whose case was dismissed by the lower court.

On support for women victims of discrimination and violence in gaining access to justice

12. The Commission is concerned that its regional consultations reported issues on access and barriers to remedies. Participants reported lack of or insufficient awareness by the community and by community state actors on laws protecting women.²²
13. Women of diverse sexual orientation and gender identity and expression (“SOGIE”) expressed difficulty in accessing remedies due to stigma based on SOGIE and the absence of protocols in handling their complaints. In Cagayan de Oro, a lower court dismissed the case of child abuse committed by a School Principal against a young girl who refused to wear skirts and was made to parade in school grounds wearing a curtain. In the case of Jennifer Laude, a transwoman murdered by an American serviceman, **the ‘transphobia’ of the perpetrator was considered mitigating circumstance in his favor by the trial court.** More recently, another transwoman was brutally murdered and stuffed inside a suitcase.²³
14. Despite the reported training of sign language interpreters,²⁴ **police precincts, health centers/hospitals and court processes remain inaccessible for persons with disability (“PWDs”).** This has been reiterated by the submission of Philippine Deaf Resources Center (“PDRC”) and the Philippine Alliance of Persons with Chronic Illness to the CHRP’s National Inquiry on Reproductive Health. The PDRC reports that deaf survivors of rape continue to seek their assistance in the filing of cases due to lack of interpreters in various levels of the criminal justice system.²⁵

²¹ On 6 April 2016, the Supreme Court granted the motion of the CHRP to intervene in support of the Flight Attendants and Stewards Association of the Philippines against Philippine Airlines.

²² Regional Consultation result show that more than 50% of the FGDs conducted had participants who claim that they are not aware of the laws on women and children, and that those who were aware, still felt the need for more information on the laws and legal and gender sensitivity training for government service providers;

²³ See Rida Reyes, “Chinese nabbed for killing transgender Pinay found stuffed in luggage”, GMA NEWS ONLINE, June 5, 2016, available at <http://www.gmanetwork.com/news/story/568835/news/regions/chinese-nabbed-for-killing-transgender-pinay-found-stuffed-in-luggage>. See also “Police arrest suspect in murder of transgender woman found in luggage”, THE PHIL. STAR, June 5, 2016, available at <http://www.philstar.com/nation/2016/06/05/1590331/police-arrest-suspect-in-murder-of-transgender-woman-found-in-luggage>.

²⁴ CEDAW/C/PHL/Q/7-8Add.1, para. 7.9.

²⁵ From the submission of the Philippine Deaf Resources Center (PDRC) as represented by Dr. Liza Martinez to the CHRP’s National Inquiry on RH

15. The Commission notes that women with disability have difficult accessing protection services. State Party assertions notwithstanding,²⁶ the Commission is concerned at the lack data on PWDs, as well as sign language interpreters in courts, police women's desks, health centers and hospitals. The call by the PDRC and other NGOs focusing on disability on the National Disability Council for the institutionalization of sign language interpreters have not been supported, leaving deaf victims of violence and deaf in need of health services lacking in access.
16. Other barriers to access to justice brought to the attention of the Commission include: insensitivity of service providers, lack of adequate support system, including financial support in pursuing complaints and cases in court, inaccessibility of shelters and psychosocial interventions, and failure to issue or implement protective measures provided by the law.
17. The Committee may wish to urge the State Party to elaborate on its efforts of ensuring access to justice, particularly to protective services and adequate support systems, to women living in geographically inaccessible and isolated areas, including indigenous and Moro women, as well as efforts to make these available to women with diverse SOGIE.
18. The Committee may also wish to recommend that the State Party report on efforts to collect data on women and girls with disabilities, including violence against women with disabilities. Finally, the Committee may wish to recommend that the Party report on efforts to address employment discrimination against PWDs and the call of PWDs to institutionalize sign language interpreters in all government facilities.

On measures to increase awareness, and data collection on various forms, of violence against women (para. 16.) and information on VAW

19. The Commission notes that there are different definitions of the acts that constitute "violence against women" under the Anti-Violence against Women and their Children Act of 2004²⁷ and the Magna Carta of Women,²⁸ the latter definition being more consistent with DEVAW.
20. While the Commission appreciates the State Party report on the prevalence of violence against women, a data gap continue exists in relation to violence experienced by persons with disabilities, and indigenous and *Moro* women. Neither is there data on the prevalence of violence experienced by women in the context of displacement, development aggression and armed conflict, and on the precise measures taken by the State Party to address these forms of violence against women.
21. Consultations conducted by the Commission highlight how poverty and displacement due to natural disasters, development aggression, and armed conflict has made women and girls more vulnerable to sexual violence, trafficking, prostitution, and at risk of acquiring

²⁶ See CEDAW/C/PHL/Q/7-8, para. 18.4.

²⁷ AVAWC, Republic Act No. 9262 (March 8, 2004), sec. 3.

²⁸ MCW, Republic Act.No. 9710 (August 14, 2009), sec.4(k).

sexually transmitted diseases and infections. Religious and culturally sensitive responses are wanting and insufficiency or absence of psychosocial debriefing and rehabilitation were reported.

22. The Committee may wish to recommend that the State Party take all necessary measures to ensure the availability and accessibility of remedies aimed at addressing **all forms of “violence against women,”** including those perpetrated through Information Communication Technology, street and transportation sexual harassment, and those perpetrated in the context of displacement and armed conflict.
23. The Committee may also wish to recommend that the State Party report on the measures in place to protect women and to address vulnerabilities in the context of displacement and humanitarian situations. Specifically, the State may be asked to report on specific interventions and how they effectively address the multiple and intersecting forms of discrimination experienced by indigenous and Moro women in the context of displacement, armed conflict, and/or development aggression.

On changes in traditional patriarchal attitudes and gender-role stereotypes (para. 18).

24. The Commission notes the emphasis on education, advocacy, and training as the State Party’s “main strategy to eliminate gender stereotyping.”²⁹ The Commission, as Gender Ombud, has issued advisories and resolutions with recommendations addressing gender stereotypes as well as the culture of violence against women. In 2014, it issued an advisory against the trivialization of rape and objectification of women by local businesses,³⁰ and recommended the monitoring of businesses on their compliance with women’s human rights under the principles of Business and Human Rights. The CHRP also called on State agencies to “put in place corresponding policies and regulatory measures to address discriminatory messages in products and to regulate shows which portray women in discriminatory and derogatory manner;” and “to fulfill its obligations to respect, protect, and fulfill the rights of everyone including, in particular, women, children and rape victims.”
25. Recently, the CHRP issued a resolution finding incoming Philippine president Rodrigo Roa Duterte guilty of violating the MCW for a rape joke made during his campaign and other acts which derogate and objectify women.³¹ The CHRP recommended the filing of appropriate charges, the incorporation of women’s human rights and gender sensitivity training in the curricula of all educational institutions, and training for all government employees.
26. The Committee may wish to urge the State Party to strictly implement MCW provisions proscribing the derogatory portrayal of women, and recommend that the State Party report on how it addresses recommendations of the CHRP and on the efforts aimed at addressing

²⁹ See CEDAW/C/PHL/Q/7-8, para. 6.1.

³⁰ On The Protection and Promotion of the Right to Dignity, Equality and Non-Discrimination of Women, and the Call for Corporate Responsibility to Respect Women’s Human Rights.

³¹ Available at <http://www.chr.gov.ph>.

gender stereotypes, the derogatory portrayal of women, and combating the perpetration of a culture of violence against women.

On addressing trafficking, discouraging the demand for prostitution, and giving financial support to organizations involved in the rehabilitation of women in prostitution (para. 20)

27. The Commission acknowledges that criminal liability attaches to any person who profits from prostitution or procures the services of another person for the purpose of prostitution.³² Anti-trafficking legislation also makes it unlawful for any person to “hire a person to engage in prostitution”.³³
28. However, the Commission laments that the decriminalization of prostitution and the penalization of handlers (or pimps) are still subject of draft legislation.³⁴ Despite recent amendments to the penal code,³⁵ prostitution remains a penal offense applicable exclusively to women, with no criminal liability attaching to the “john”. This is not denied by the State party responses to the list of issues.³⁶
29. Moreover, as originally envisioned, all fines, proceeds and properties forfeited and confiscated pursuant to anti-trafficking prosecutions accrued to a Trust Fund to be administered by the Inter-Agency Committee against Trafficking (“IACAT”), to be used exclusively for anti-trafficking prevention and victim-rehabilitation programs, including providing technical and material support to non-government organizations (“NGOs”).³⁷ However, amending legislation provides that the sources of the Trust Fund are “earmarked as additional funds for the use of the Council.”³⁸
30. Since the original provision on the Trust Fund was not amended nor repealed, the Commission is concerned that money collected could be used by the IACAT for purposes other than the Trust, as any other interpretation would render the new provision meaningless. Thus, NGOs formerly benefitting from IACAT funding could be casualties of this amendment.
31. The Committee may wish to urge the State Party to clarify whether funding from the IACAT for NGO-run programs on anti-trafficking prevention and victim-rehabilitation is affected by the amendments to the anti-trafficking law.

On temporary special measures to accelerate women’s equal participation in political and public life and ensure their representation in political and public bodies (para. 24).

32. The Commission acknowledges the pendency in the legislature of several bills mandating that 50% of representatives nominated among the members of a registered political party

³² REV. PEN. CODE, art. 342, *as amended by* Batas Pambansa Blg. 186 (March 16, 1982), sec. 1.

³³ Anti-Trafficking in Persons Act, Republic Act No. 9208 (May 26, 2003), sec. 4(e).

³⁴ *See id.*, paras. 17, 52 and 91.

³⁵ *See* REV. PEN. CODE, art. 202, *as amended by* Republic Act No. 10158 (March 27, 2012), sec. 1.

³⁶ CEDAW/C/PHL/Q/7-8/Add.1, para. 9.2.

³⁷ Anti-Trafficking in Persons Act, Republic Act No. 9208 (May 26, 2003), sec. 15(e).

³⁸ *Id.*, sec. 28-A, *as inserted by* Republic Act No. 10364 (February 6, 2013), sec. 25.

or organization be women, that the final five representatives of each party must be composed of at least two (2) women, and allotting 1/3 of the appointive positions in government to qualified women, among others.³⁹

33. However, the Commission must point out that the MCW already mandates the undertaking of temporary special measures, specifically, “[w]ithin the next five (5) years, the number of women in third (3rd) level positions in government shall be incrementally increased to achieve a fifty-fifty (50-50) gender balance”⁴⁰; and women composing “at least forty percent (40%) of membership of all development councils from the regional, provincial, city, municipal, and barangay levels shall be composed of women”⁴¹, among others.
34. The Committee may wish to urge the State Party to strictly implement the provisions of the Magna Carta of Women on temporary special measures, particularly since these provisions do not require implementing legislation.

On enhancing women’s access to health care, in particular to sexual and reproductive health services (para. 28)

35. The Commission notes the assertion of the State Party that all local issuances that contravene the Responsible Parenthood and Reproductive Health Act of 2012⁴² (“RPRH Law”) have been “effectively revoked”.⁴³ However, the findings of the CHRP’s inquiry on RH show that **the RPRH Law is not being implemented uniformly**, and that there are policies and practices that negatively impact women, especially the most marginalized.
36. Moreover, in the City of Manila, while EO 003 has been superseded by EO 030, the latter order continues to bar local funding for artificial contraceptives.
37. The CHRP is alarmed that the City of Sorsogon proclaimed itself to be “pro-life” last 2 February 2015, which resulted in the withdrawal of all artificial contraceptives in city and community health facilities. While the Department of Health supplements the absence of supply through the deployment of National Government nurses to the City of Sorsogon, these nurses are:
 - a) prohibited from dispensing commodities in city and community health facilities;
 - b) required to attend up to five communities; and
 - c) unable to reach certain communities within the city.

Since the “pro-life” declaration, the CHRP has documented reports of denial of family planning commodities (resulting in added financial burden on women who have to purchase contraceptives) and an increase in unwanted pregnancies, with the Mayor

³⁹ See CEDAW/C/PHL/Q/7-8/Add.1, paras. 5.1-5.3.

⁴⁰ MCW, Republic Act. No. 9710 (August 14, 2009), sec. 11, second paragraph, subparagraph (a). Emphasis supplied.

⁴¹ *Id.*, subparagraph (b).

⁴² Republic Act No. 10354 (December 21, 2012).

⁴³ CEDAW/C/PHL/Q/7-8/Add.1, para. 16.1

refusing to heed Department of Health advise to provide the whole range of family planning commodities in accordance with the RPHRH Law.

38. In her defense, the Mayor of Sorsogon City invokes her right as a ‘conscientious objector’ on the basis of the decision of the Supreme Court in *Imbong v. Ochoa*,⁴⁴ which declared the RPRH Law not unconstitutional but voided the provision penalizing public officers who refuse to implement the law, categorizing them as a ‘*conscientious objectors.*’
39. Moreover, the criminalization of abortion remains in place, and despite provisions post-abortion care (“PAC”), the stigma of abortion affects the availability and adequacy of PAC in health facilities. Information before the Commission reveals that some government hospitals have refused women in need of PAC, while one woman, although given PAC, was arrested and sent to jail after treatment. The submission of EngendeRights and Center for Reproductive Health Rights further elaborates on the issue, showing how the criminalization of abortion has directly impacted the delivery of quality, humane, non-judgmental PAC as required by law. CRR likewise report the policy against emergency contraceptives and how this adversely affects women survivors of sexual violence.
40. The CHRP has also documented local government units that criminalize and penalize home births. These ordinances, although encouraging facility based delivery, penalize birth attendants and women who give birth at home. The CHRP is concerned with the proliferation of these ordinances, as they impact indigenous women in exercise of their cultural rights, and women in geographically isolated areas, beyond the reach of government health services and facilities.
41. The CHRP Inquiry also documented the implementation of the policy requiring the consent of parents of minors wanting to access reproductive services and minors wanting to be tested for HIV. While not consistently practiced, the CHRP also documented hospitals requiring spousal consent for tubal ligation.
42. The Committee may wish to urge the State Party to report on its strategies in implementing the RPRH Law and the realization of women’s right to reproductive health in view of the foregoing barriers. Specifically, the Committee may wish to urge the State Party to:
 - a) review the effectiveness of decentralization in the delivery of health services and pass the necessary legislation to address the fragmentation of the health delivery system, including review of the Magna Carta for Health professionals;
 - b) report on the efforts to address the situation of Sorsogon City (and other local government units similarly situated) and the denial of RH services in the area;
 - c) clarify the scope of the ‘conscientious objector’ and study its impact on the provision of reproductive health services;
 - d) provide information on the efforts of the State Party to ensure quality, humane, non-judgmental post-abortion care;
 - e) issue a policy against the criminalization of home births and instead conduct broad-based consultations with health professionals, traditional birth

⁴⁴ G.R. No. 204819 (April 8, 2014).

- attendants, and indigenous peoples with the end of putting in place a human rights based and sustainable strategy towards safe deliveries; and
- f) review the consent requirement, whether practiced locally or mandated by law, in view of complaints that such requirement denies women and girls access to RH services and autonomy over their bodies.

On the needs of rural women, indigenous women and Muslim women living in the autonomous region of Muslim Mindanao (para. 30)

43. While the State Party claims that it is implementing programs for rural women and women in the informal sector,⁴⁵ consultations conducted by the Commission highlight the vulnerability of women in the informal sector to abuse and exploitation, without receiving any social benefits and services. Similar findings were reported for rural women regarding access to social, health, education and employment services.
44. The Committee may wish to reiterate its previous recommendation for the State Party to **enhance the situation of rural women in the informal economy** and report on the results and impact of its implementing programs.

OTHER MATTERS

On labor trafficking and women migrant workers

45. In March 2016, members of the Commission met with Filipino teachers in Washington, D.C. who were victims of labor trafficking. They complained of having been issued employment visas from the United States through a certain recruiter, only to discover the absence of available work in the United States. **The Commission is concerned at the number of victims**, which has reached a thousand Filipino teachers, **who are mostly women.**
46. The Committee may wish to recommend that the State Party address labor trafficking by reviewing, in coordination with host governments, the issuance of employment visas to ensure the validity and existence of actual employment.
47. In a forum⁴⁶ conducted by the Commission with women migrant workers, emerging issues included the issues raised by Batis Center for women on women migrant workers who were divorced/annulled by their foreign spouses and who, despite a Supreme Court decision allowing them to remarry in the Philippines, found it extremely difficult to have the divorce judicially recognized in the Philippines. Other emerging issues raised included health concerns of women migrants with diverse SOGIE, women migrants living with HIVs, and women deportees from Sabah.

⁴⁵ See CEDAW/C/PHL/7-8, para. 155.

⁴⁶ In Focus: Women Migrant Workers, Persons with Diverse SOGIE and the CMW Concluding Comments (8 December 2015), in partnership with the Center for Migrants' Advocacy and UN Women;

48. The Committee may wish to direct the attention of the State on these issues and inquire on the efforts of the State in addressing the concerns of Filipinas divorced by foreign husbands; the health and discrimination experienced by migrant women with diverse SOGIE and those living with HIV, and women deportees from Sabah, Malaysia.

On measures to implement the views of the Committee

49. The Commission is concerned at the assertion of the State Party that legislation is required to implement the views of the Committee with respect to compensation,⁴⁷ especially since the views on the *Vertido* communication is of 2010 vintage.

50. The Committee may wish to urge the State Party to pass the necessary legislation to give full effect to the views of the Committee. The Committee may wish to inquire as well on the State's efforts to implement the views of the Committee in the case of the deaf victim survivor of Rape, *R vs. Philippines* and the CEDAW Inquiry in the City of Manila.

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⁴⁷ See CEDAW/C/PHL/Q/7-8 Add.1, para. 7.8