

PREVENTING HUMAN TRAFFICKING IN THE PHILIPPINES OVERVIEW AND CURRENT ACTIVITIES

*Aileen Marie S. Gutierrez**

I. INTRODUCTION

As a signatory to the “Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children,” which supplemented the United Nations Convention against Transnational Organized Crime, the Philippines is actively engaged in combating human trafficking – an international problem that is an affront to the basic human rights of individuals worldwide. Combating human trafficking is a challenging endeavor, one that requires a multi-stakeholder approach both domestically and internationally.

This paper discusses the Philippines’ ongoing efforts to actively fight human trafficking. It first presents an overview of (1) the legal framework relative to human trafficking in the Philippines, and (2) the domestic multi-stakeholder entity tasked with fighting human trafficking, the Inter-Agency Council Against Trafficking (IACAT). Next, it outlines the actions of the Department of Justice of the Philippines, which leads the IACAT. Finally, it concludes with some observations on how the Philippines can improve its ongoing efforts, including the need for better international coordination.

II. LEGAL FRAMEWORK

A. Governing Law

The basic law that instituted policies to prevent human trafficking is Republic Act No. 9208, also known as the “Anti-Trafficking in Persons Act of 2003,” which was passed on May 12, 2003 and took effect on June 19, 2003. Section 3(a) of this law defines trafficking in persons as:

“the recruitment, transportation, transfer or harboring, or receipt of persons with or without the victim's consent or knowledge, within or across national borders by means of threat or use of force, or other forms of coercion, abduction, fraud, deception, abuse of power or of position, taking advantage of the vulnerability of the person, or, the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation which includes at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery, servitude or the removal or sale of organs.”¹

R.A. No. 9208 further provides that “[t]he recruitment, transportation, transfer, harboring or receipt of a child for the purpose of exploitation shall also be considered as ‘trafficking in persons’ even if it does not involve any of the means set forth [above].”² The Act provides penalties for three categories of trafficking: (1) acts of trafficking in persons,³ (2) acts that promote trafficking in persons,⁴ and (3) qualified trafficking in

* Senior Assistant State Prosecutor, Vice-Chair, Task Force on Anti-Trafficking in Persons, Department of Justice, Philippines.

¹ Anti-Trafficking in Persons Act of 2003, R.A. No. 9208 (May 2003).

² *Id.*

³ *E.g.*, (1) introducing or matching for money or other consideration, any person or, as provided for under Republic Act No. 6955, any Filipina, to a foreigner, for marriage for the purpose of prostitution, pornography, sexual exploitation, forced labor, slavery, (2) involuntary servitude or debt bondage; undertaking or organizing tours and travel plans consisting of tourism packages or activities for the purpose of prostitution, pornography or sexual exploitation; and (3) offering or contracting marriage, real or simulated, for the purpose of prostitution, pornography, sexual exploitation, forced labor or slavery, involuntary servitude or debt bondage. See Office of the President of the Philippines, Commission on Filipinos Overseas, Anti-Trafficking in Persons Act of 2003, Primer on R.A. 9208, 2nd Ed. (2009), available at <http://www.cfo.gov.ph>

⁴ *E.g.*, (1) knowingly leasing or subleasing property for trafficking purposes; and (2) producing, printing, issuing or distributing un-issued, tampered or fake counseling certificates, registration stickers and certificates of any government agency used for regulatory and pre-departure requirements for the purpose of promoting trafficking in persons; *Primer on R.A. 9208*.

persons.⁵ The penalties are as follows:

Act	Penalty
Acts of Trafficking	20 years' imprisonment and a fine of P1 to 2 million
Acts that Promote Trafficking	15 years' imprisonment and a fine of P500,000 to P1 million
Qualified Trafficking	Life imprisonment and a fine of P2 to 5 million

B. Procedure for the Filing of Trafficking in Persons (TIP) Cases

A criminal action for violation of R.A. No. 9208 is commenced or instituted by the filing of the complaint by any person who has personal knowledge of the commission of any offence under said Act; the trafficked person, parents, spouse, siblings, children, legal guardian of the trafficked person; or by referral from or upon the request of the law enforcement agency that investigated the incident, with the Department of Justice or the office of the prosecutor that has jurisdiction over the offense charged. The complaint shall state the full names and addresses of the complainant/s and respondent/s, offense/s charged and the place and approximate date of commission. It shall be accompanied by the affidavits of the witnesses, as well as other supporting documents to establish probable cause. The complaint is either filed for preliminary investigation or inquest proceeding.

Preliminary investigation is an inquiry or proceeding to determine whether there is a sufficient ground to engender a well-founded belief that a crime has been committed and the respondent is probably guilty thereof, and should be held for trial.⁶ In a preliminary investigation, the investigating prosecutor makes a determination if there is probable cause to file an indictment in court. Probable cause is a reasonable ground of presumption that a matter is so or may be well-founded; such a state of facts in the mind of the prosecutor as would lead a person of ordinary caution and prudence to believe, or entertain an honest or strong suspicion, that a thing is so.⁷ A finding of probable cause does not require an inquiry into whether there is sufficient evidence to procure a conviction. It is enough that it is believed that the act or omission complained of constitutes the offense charged, as there is a trial for the reception of evidence of the prosecution in support of the charge.⁸

Generally, a prosecutor is afforded wide latitude of discretion in the conduct of preliminary investigation. The prosecutor alone determines the sufficiency of evidence that will establish probable cause justifying the filing of the criminal information. The prosecutor's findings are, however, subject to review by the Secretary of Justice.⁹ In turn, judicial review of the resolution of the Secretary of Justice is allowed only in clear cases of grave abuse of discretion, that is, when the exercise of the discretion was done in an arbitrary or despotic manner by reason of passion or personal hostility and must be so patent and gross as to amount to an evasion of positive duty or to a virtual refusal to perform the duty enjoined by or to act at all in the contemplation of law.¹⁰

A preliminary investigation is not required in cases of "warrantless arrests." When a person is lawfully arrested without a warrant involving an offense for violation of R.A. No. 9208, the indictment may be filed by a prosecutor without need of such investigation, provided an inquest proceeding has been conducted.

⁵ Qualified trafficking in persons occurs when: (1) the trafficked person is below 18 years old; (2) the adoption is effected through Republic Act No. 8043 or the "Inter-Country Adoption Act of 1995" and said adoption is for the purpose of prostitution, pornography, sexual exploitation, forced labor, slavery, involuntary servitude or debt bondage; (3) the crime is committed by a syndicate, or in large scale; (4) the offender is an ascendant, parent, sibling, guardian or a person who exercises authority over the trafficked person or when the offense is committed by a public officer or employee; (5) the trafficked person is recruited to engage in prostitution with any member of the military or law enforcement agencies; (6) the offender is a member of the military or law enforcement agencies; and (7) by reason or on occasion of the act of trafficking in persons, the offended party dies, becomes insane, suffers mutilation or is afflicted with Human Immunodeficiency Virus (HIV) or Acquired Immune Deficiency Syndrome (AIDS); *Primer on R.A. 9208*.

⁶ Section 1, Rule 112, Revised rules on Criminal Procedure.

⁷ Revised Manual for Prosecutors, p. 79 (2008).

⁸ Paredes, Jr. vs. Sandiganbayan, G.R. No. 108251, January 31, 1996 cited in the Revised Manual for Prosecutors, p. 79 (2008).

⁹ Spouses Artemnio and Esperanza Duran vs. Levi Chong, g.R. No. 172796, July 13, 2009.

¹⁰ *Id.*

Inquest is an informal and summary investigation conducted by a prosecutor involving persons arrested and detained without the benefit of a warrant of arrest issued by the court for the purpose of determining whether said persons should remain under custody and correspondingly be charged in court.¹¹ For acts of trafficking, acts that promote trafficking and qualified trafficking, the inquest proceeding must be terminated within thirty-six (36) hours from the time of arrest.

III. INTER-AGENCY COUNCIL AGAINST TRAFFICKING (IACAT)

Section 20 of R.A. No. 9208 established the Inter-Agency Council Against Trafficking (IACAT), which follows a multi-stakeholder approach to combat human trafficking. It undertakes measures to prevent and suppress TIP and ensures the victims' recovery, rehabilitation and reintegration into mainstream society.

The members of the IACAT are composed of the following government agencies and non-government sectoral representatives, namely:

- Chairperson – Department of Justice
- Co-Chair – Department of Social Welfare and Development
- Members:
 - Department of Foreign Affairs
 - Department of Labor and Employment
 - Philippine Overseas Employment Administration
 - Philippine National Police
 - Bureau of Immigration
 - National Commission on the Role of Filipino Women
 - Children's Sector NGO Representative from End Child Prostitution, Pornography and Trafficking (ECPAT Philippines)
 - Women's Sector NGO Representative from Coalition Against Trafficking in Persons – Asia-Pacific (CATW-AP)
 - OFW Sector Representative
- Ex-Officio Members
 - National Bureau of Investigation
 - Department of the Interior and Local Government
 - Philippine Center for Transnational Crime
 - Council for the Welfare of Children (CWC)
 - Commission of Filipinos Overseas (CFO)
- Chair Emeritus – Office of the Vice President

Section 21 of the same law defines the powers and functions of the IACAT as follows:

- Formulate a comprehensive and integrated program to prevent and suppress trafficking in persons;
- Promulgate rules and regulations as may be necessary for the effective implementation of this Act;
- Monitor and oversee the strict implementation of this Act;
- Coordinate the programs and projects of the various member agencies to effectively address the issues and problems attendant to trafficking in persons;
- Coordinate the conduct of massive information dissemination and campaign on the existence of law and various issues and problems attendant to trafficking, through the local government units (LGUs), concerned agencies, and NGOs;
- Direct other agencies to immediately respond to the problems brought to their attention and report to IACAT the action taken;

¹¹ Revised Manual for Prosecutors, p. 44 (2008).

150TH INTERNATIONAL SENIOR SEMINAR
PARTICIPANTS' PAPERS

- Assist in filing of cases against individuals, agencies, institutions or establishments that violate the provisions of this Act;
- Formulate a program of reintegration of trafficked persons in cooperation with the DOLE, DSWD, Technical Education and Skills Development Authority (TESDA), Commission on Higher Education (CHED), LGUs and NGOs;
- Secure from any department, bureau, office, agency, or instrumentality of the government or from NGOs and other civic organizations such assistance as may be needed to effectively implement this Act;
- Complement the shared government information system for migration established under R.A. No. 8042, otherwise known as the "Migrant Workers and Overseas Filipinos Act of 1995" with data on cases of trafficking in persons, and ensure that the proper agencies conduct continuing research and study on the patterns and scheme of trafficking in persons which shall form the basis for policy formulation and program direction;
- Develop the mechanism to ensure the timely, coordinated and effective response to cases of trafficking in persons;
- Recommend measures to enhance cooperation efforts and mutual assistance among foreign countries through bilateral and/or multilateral arrangements to prevent and suppress international trafficking in persons;
- Coordinate with the Department of Transportation and Communication (DOTC), Department of Trade and Industry (DTI), and other NGOs in monitoring the promotion of advertisement of trafficking in the internet;
- Adopt measures and policies to protect the rights and needs of trafficked persons who are foreign nationals in the Philippines;
- Initiate training programs in identifying and providing the necessary intervention or assistance to trafficked persons; and
- Exercise all powers and perform such other functions necessary to attain the purposes and objectives of this Act.

IV. DEPARTMENT OF JUSTICE (DOJ) ACTIVITIES

The DOJ is responsible for prosecuting trafficking cases. It also acts as the lead agency of IACAT, and implements certain programs and initiatives against trafficking in persons, in addition to the efforts made by other IACAT members in accordance to their mandates. Each of these activities is discussed briefly.

A. DOJ-led Investigations and Prosecutions

To sustain our drive to prevent trafficking, the DOJ-IACAT is currently setting up a quick reaction team (QRT)/task force composed of prosecutors, law enforcement investigators, welfare officers, and non-government organizations (NGOs). The QRT is designed to centralize the rescue operation of the existing anti-trafficking law enforcement units. The IACAT will create these task forces in all the seventeen (17) regions in the Philippines. Presently, there are eight (8) anti-trafficking task forces being supervised and supported by the IACAT, all headed by a DOJ prosecutor, as follows:

1. National Inter-Agency Task Force Against Trafficking in Persons (NIATFAT)
2. Ninoy Aquino International Airport (NAIA) Task Force
3. Manila North Harbor Task Force
4. Diosdado Macapagal International Airport Task Force
5. Region V Task Force (Bicol Region)
6. Region VII Task Force (Cebu)
7. Region IX Task Force (Zamboanga)
8. Region XI Task Force (Davao)

These teams (1) conduct intelligence, surveillance and monitoring of trafficking operations in the target area in coordination with the local enforcement agency; (2) undertake a unified, coordinated, and synchronized interception, arrest and investigation of traffickers and intercept or rescue victims of trafficking; (3) document and gather evidence, including relevant information on the profile of traffickers, organization involved, trafficking modus operandi; and (4) file complaints against suspected traffickers.

These task forces have been successful in curbing trafficking incidents in their respective regions and have derailed would-be traffickers in their illegal pursuits, forcing them to seek alternative routes.

B. DOJ-assisted Rescue Operations and Prosecutions

The DOJ-IACAT also supervises and supports the intelligence, surveillance, and rescue operations of the Anti-Human Trafficking Division of the National Bureau of Investigation (NBI) and prosecution of trafficking cases by the DOJ Task Force on Anti-Trafficking in Persons, a group of specialized prosecutors that handles trafficking cases.

In particular, on May 18, 2011, the IACAT, in coordination with the Asia Against Child Trafficking, the Philippine Embassy in Malaysia assisted twenty (20) Filipino fishermen, who were victims of trafficking for forced labor in Kuching, Malaysia. Prior to repatriation, the DOJ sent two (2) prosecutors to Malaysia to get the victims' affidavits in preparation for the filing of trafficking cases against their recruiters, a Filipino and a foreign national.

The Anti-Human Trafficking Division of the NBI assists the NAIA Task Force in the investigation of TIP incidents at the NAIA Terminals 1, 2, and 3 on 24/7 tour of duty. It also conducts independent surveillance and rescue operations.

C. Monitoring of TIP Cases

To minimize delay in the prosecution of TIP cases, facilitate the resolution of cases and increase the rate of convictions, the DOJ issued Department Circular Nos. 49¹² and 57,¹³ directing all prosecutors to prioritize and expedite the resolution and trial of such cases, oppose motions designed to delay the prosecution, and prohibit the dismissal of TIP cases on certain grounds. The DOJ likewise sought the assistance of the Office of the Court Administrator (OCA) of the Supreme Court of the Philippines, to direct all courts to prioritize and expedite the trial of TIP cases.

On October 26, 2010, the Supreme Court issued OCA Circular No. 151-2010 directing all Judges in the Regional Trial Courts, Metropolitan Trial Courts, Municipal Trial Courts in Cities and Municipal Trial Circuit Trial Courts, to expedite and prioritize disposition of TIP cases, and submit the list and status of trafficking cases pending in their respective courts.

Based on an inventory of cases from 2003-2011, there are a total of 1,072 trafficking cases pending before the DOJ and the courts.

- From 2003-2011: there were 48 convictions involving 56 traffickers. In addition to the said numbers were three (3) convictions for TIP-related Illegal Recruitment cases.
- From 2010 to 2011, there were 25 convictions involving 31 persons, doubling convictions from 2003 to 2009.

D. Minimizing Trafficking-Related Corruption Cases

Corruption unfortunately impedes our work, particularly with TIP cases. To this end, the DOJ filed and is closely monitoring the administrative and criminal cases involving government officials complicit with traffickers. These cases involve immigration officers, agents of the NBI, an employee of the Manila International Airport Authority, and even elected officials.

¹² Issued on June 25, 2010.

¹³ Issued on July 29, 2010.

E. Increase in the Number of Personnel Dedicated to Anti-Trafficking Efforts

On October 5, 2011, the Secretary of Justice issued Department Order No. 826 reconstituting task forces in the DOJ main office, including the Task Force on Anti-Trafficking in Persons. There are now 18 prosecutors in our office specifically designated to handle and prosecute TIP cases. There are about 60 prosecutors in the National Capital Region and Local Offices of the DOJ who were likewise designated to handle and prosecute TIP cases. In addition, there are 43 prosecutors designated to assist law enforcement operatives in their case build up.

The DOJ likewise hired and designated the following to assist the NAIA Task Force in its daily monitoring of outbound passenger and investigation of trafficking incidents at the airport, and administrative operations of IACAT:

Technical Assistants /Confidential Agents	–	12
Technical Assistants/Consultants	–	18
NBI-Anti-Human Trafficking Division Agents	–	14

F. IACAT 1343 Hot Line

On March 15, 2011, the DOJ launched the IACAT Action Line 1343, a 24/7 hot line that will respond to emergency or crisis calls from victims of human trafficking. The Commission on Filipino Overseas, through a Memorandum of Agreement with the DOJ-IACAT, oversees the operation of the action line.

From March 15 to May 22, 2011, there were a total of 2,161 received calls, twenty (20) of which were verified calls for TIP (three calls), sixteen (16) for illegal recruitment cases and one (1) for mail order bride.

G. Development of National Strategic Action Plan against TIP

The IACAT, with the DOJ on the lead, is currently developing a new 6-year plan of action, which will draw a roadmap and chart the course of action of the government against TIP for 2011-2016. While the previous action plan (2004-2010) focused on the three major components – prevention, protection (including law enforcement and prosecution), and recovery and reintegration – the new plan of action will focus on the following six (6) key areas of intervention: (1) advocacy and prevention; (2) protection and assistance; (3) enforcement and prosecution; (4) victim support and reintegration; (5) partnership; and (6) structural and legal framework. The action plan is at its validation stage.

On December 12, 2011, the DOJ presented the Strategic Plan to IACAT partners for comments.

H. Manual on TIP for Forced Labor

With the assistance of the International Labor Organization, the DOJ is finalizing the Manual on the Prosecution and Investigation of TIP for Forced Labor. The Manual will serve as a guideline in investigating and prosecuting TIP for forced labor as it seeks to address certain issues relative to forced labor, *i.e.*, its definition, elements, indicators, and its distinction from other related laws, such as from Illegal Recruitment under the Migrant Workers' Act and Labor Code of the Philippines, Worst Form of Child Labor under R.A. No. 9231, and other Prohibited Acts relating to labor under the Revised Penal Code and the Civil Code of the Philippines. The Manual is also at its validation stage.

I. Capacity Building and Awareness Campaign

Finally, the DOJ continues to conduct trainings and workshops to enhance the capacity of front line workers. These include:

- *Expansion of anti-trafficking training programs for Foreign Service Officers (FSO).* The training of our FSOs, consisting of labor and welfare attaches, Assistance to Foreign Nationals (ATN) officers and other personnel of Philippine posts abroad, particularly in countries where there are significant numbers of trafficking incidents, is ongoing. The FSOs are the first line of service providers catering to all distressed Filipinos, including TIP victims.

On November 17-19, 2010, the first training session was held in Kuala Lumpur, Malaysia, with FSOs from the ASEAN Region, Taipei and Hong Kong. The second training session was in Amman, Jordan on December 9-12, 2011, with participation from FSOs of the Middle East and African countries. The

training also seeks to strengthen coordination and referral systems among our FSOs, particularly in countries with connecting borders, like countries in the ASEAN Region. The training is a joint effort of the Department of Foreign Affairs and DOJ.

- *Training of DOJ Prosecutors through the RP-US Letter of Agreement.* US Embassy personnel conducted training for prosecutors pursuant to the Letter of Agreement between the Philippines and United States. Training sessions were held in Boracay, Cebu and Manila.
- *Training of Prosecutors, in partnership with the Australian government, through the Asia Regional Trafficking in Persons Project (ARTIP).* The “Pilot ASEAN Skills Course Training on Trafficking in Persons for Specialist Prosecutors” was held from July 19-23, 2010 in Subic and trained 30 prosecutors from the DOJ main office, National Capital Region, Regions III and II. The second training session was held on March 14-18, 2011 in Manila and attended by 30 prosecutors, mostly members of the task forces.
- *The Philippine Anti-Trafficking in Persons Database (PATD).* Launched on December 16, 2009, the PATD is an effective tool in generating accurate information to fully understand the causes, processes, trends and consequences of TIP. Statistics and reports drawn from the database will be useful in outlining and improving the country’s anti-TIP policies and programs. Standard Reporting Formats, one for law enforcers and another for prosecutors were likewise developed to ensure that only essential information are elicited.

With the support of the UNICEF, the DOJ conducted five (5) trainings for the users of the database for TIP. A total of 125 Administrative Officers and Personnel in the following offices of the National Prosecution Service were trained: (1) NCR Field Offices and Regional Office, (2) Region III Offices, (3) Regions X and XI, (4) Regions I and II, and (5) Regions VII and IX.

- *Trainings for the Members of the Task Forces and NBI Agents.*
- *Trainings for members of the task forces (NIATFAT, NAIA, and Regional Task Forces).*
- *Training of Trainers for a pool of speakers to intensify Anti-TIP campaign, and the 1343 Action against TIP.*

V. LOOKING AHEAD

The Philippines has made significant strides in combating trafficking; nevertheless, there is so much that remains to be done. Presently, the IACAT is able to take action on domestic trafficking, but is not yet able to fully respond to cases of trafficking with international dimensions, particularly those affecting our Overseas Filipino Workers and those victimized abroad. Accordingly, the IACAT is looking to create the following comprehensive anti-trafficking framework to address TIP in all its cycles:

- Intensify witness protection program and assistance to victims of TIP, by setting up temporary shelters catering exclusively for trafficking victims and medical and health care programs, and providing assistance to rescued victims in terms of physical, mental and psychological rehabilitation as well as successful reintegration to the society.
- Set up Anti-Trafficking Operations Center that will monitor and supervise task forces, take actions on the reports and referral from the IACAT hot line, and other IACAT-assisted rescue operations.
- Intensify efforts in rescuing victims of trafficking abroad, and investigating TIP with international dimensions.
- Increase of human resources of the IACAT and its task forces.
- Create task forces in all regions in the country, particularly in areas in Laoag International Airport, which remains as the only international exit port without a task force that monitors outbound passengers.
- Increase the rate of convictions through monitoring of cases, support victim-witnesses, and provide administrative assistance to law enforcers and prosecutors.
- Intensify efforts to prevent or minimize trafficking-related corruption cases.
- Increase efforts to prevent incidents of TIP.

150TH INTERNATIONAL SENIOR SEMINAR
PARTICIPANTS' PAPERS

- Conduct investigations and rescue operations in various areas of the country, especially in conflict areas where the vulnerability of persons is at the highest through IACAT's task forces.
- Provide administrative assistance to the existing task forces, including capacity building for their members.
- Roll out the TIP database in the regional offices of DOJ, NBI and PNP, and provide training and equipment.
- Coordinate meetings with the Regional, Provincial, City and Municipal Inter - Agency Committees against Trafficking.
- Coordinate meeting with the Hotel Owners/Association and airline companies as part of the awareness campaign against TIP and child-sex tourism.
- Develop National Strategic Plan of Action against Trafficking in Persons (2011-2016).
- Develop Guidelines for Trafficking for Forced Labor, including training thereof of law enforcers and prosecutors.
- Oversee the implementation of the Implementing Rules and Regulations on Organ Trafficking (including coordination meeting with hospitals, medical establishment and medical professionals, and awareness campaign).
- Expand training programs to educate Foreign Service officers and other personnel of Philippine Embassies abroad in countries where there are significant numbers of trafficking incidents.
- Continue training of prosecutors, law enforcers, labor inspectors, foreign service personnel and other frontline service providers.
- Provide case-by-case assistance in complex cases with multi-jurisdictional cases crossing cities and countries, which are crucial in pursuing the leaders of trafficking syndicates.
- Develop an infomercial, public relations and media campaign against TIP, including maintenance of IACAT website.
- Conduct the 2nd National Conference on Trafficking in Persons.
- Strengthen international cooperation with other countries in the investigation and prosecution of traffickers.
- Increase efforts to engage governments of destination countries through law enforcement and diplomatic channels in the investigation and prosecution of trafficking offenders.
- Provide capital for the IACAT and its task forces and operations center.

VI. CONCLUSION

Human trafficking is a multi-million criminal industry, in which traffickers adapt quickly to perpetuate their trade. As traffickers innovate their trafficking processes, and as new purposes for trafficking emerge and new vulnerable young groups come into fold, it is imperative that countries all over the world find new ways to combat this scourge. Governments accordingly must work cooperatively – both domestically and internationally – to prevent human trafficking. The Philippines is doing its part to stem the rising tide of TIP cases, though a lot of work remains to be done, particularly with regard to international cooperation on TIP cases.