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Framing Rodrigo Duterte's ICC arrest: Examining Coverage in Philippine News Media

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Abstract

This study examines how leading Philippine news media outlets – Manila Bulletin, Philippine Daily Inquirer, and The Philippine Star – framed the International Criminal Court's (ICC) arrest warrant against former President Rodrigo Duterte in connection with his administration's war on drugs. Through a content analysis of 114 news articles published between March and April 2025, the study identified three dominant frames employed by the media outlets: legitimacy and accountability, victimization and political persecution, and sovereignty and nationalism. These frames reflect competing narratives, ranging from the ICC's role as a neutral legal institution to portrayals of Duterte as a victim of politically motivated retribution. The study also analyzed the tone of coverage, revealing a plurality of articles critical of Duterte. Findings underscore how news media not only shape public discourse around legal accountability and state sovereignty but also mediate tensions between international justice and domestic political dynamics. By highlighting the diversity of perspectives and the strategic use of frames and tone, this paper contributes to a deeper understanding of how contested political events are negotiated in media narratives. Implications for press freedom, democratic engagement, and the future of transitional justice in the Philippines are discussed.

Keywords: Media Framing, Rodrigo Duterte, International Criminal Court, War on Drugs, Content Analysis

1. Introduction

Rodrigo Duterte's six-year presidency in the Philippines (2016–2022) has been defined by his aggressive and highly controversial war on drugs (Lamchek & Jopson, 2024). Upon assuming office, Duterte initiated a nationwide anti-drug campaign that prioritized police-led operations against suspected drug users and dealers (Thompson, 2022). While the campaign received widespread domestic support at the onset, it quickly garnered international attention due to the unprecedented number of fatalities associated with it (Amnesty International, 2021; Lozada, 2021). According to estimates, 6,000 to over 30,000 individuals were killed during the anti-drug operations (Iglesias, 2023; Simangan, 2018). Many of these deaths are claimed to be extrajudicial, committed by police or vigilante groups with tacit state support (Johnson & Fernquest, 2018; Thompson et al., 2024).

Scholars and human rights organizations alike have raised serious concerns about the legal and moral legitimacy of Duterte's approach (Kenny & Holmes, 2020; Lamchek & Jopson, 2024; Medriano & Awi, 2022). Human Rights Watch (2018) documented consistent patterns of abuse, including planted evidence, falsified reports, and harassment of witnesses and families. Amnesty International (2019) also described the drug war as a “large-scale murdering enterprise,” implicating the state in potential crimes against humanity. These concerns prompted the International Criminal Court (ICC) to initiate a preliminary examination in 2018, which eventually developed into a formal investigation into allegations of extrajudicial killings and other human rights violations. In March 2025, the ICC issued an arrest warrant against Duterte, citing credible evidence of systematic attacks against civilian populations (International Criminal Court, 2025).

The Philippine government, under both Duterte and his successor Ferdinand Marcos Jr., has resisted the ICC's jurisdiction, invoking national sovereignty as a basis for non-cooperation (Cabato, 2024; Presidential Communications Office, 2024). However, debates continue whether the Philippines' prior ratification of the Rome Statute—before its withdrawal in 2019—provides sufficient legal grounding for the Court to proceed with its investigation (Bradfield, 2024).

Amid these legal and political developments, the media has played a central role in shaping public understanding of the drug war and the ICC's investigation. Media framing—defined as the selection and emphasis of particular aspects of reality in news discourse while obscuring other elements (Entman, 1993)—significantly influences how audiences interpret the motivations, consequences, and legitimacy of government actions. In a politically polarized media environment like the Philippines, where press freedom coexists with state pressure and ownership concentration (Vera Files, 2024), coverage of Duterte's ICC case is not merely a matter of reporting facts. It involves narrative construction that may reinforce official justifications or foreground accountability and justice.

This paper looks at how Philippine news media construct narratives around Duterte's ICC arrest. It aims to determine the dominant frames that arise in news coverage, exploring whether the media portrays Duterte as a political figure facing legitimate legal consequences, a persecuted leader, or a sovereign nationalist. It also seeks to examine the various tones used by these media outlets in their reporting—critical, supportive, or neutral—to assess how journalistic stance influences the shaping of public discourse around transitional justice.

The significance of this research stems from its contribution to media studies, political communication, and Philippine democracy. By analyzing the framing strategies employed by different news media outlets, this study provides insights into the development of public debate on political and legal accountability. Furthermore, it underscores the implications of press freedom in the Philippines, particularly amidst the rise of populist governance and increased media polarization. The findings can contribute to conversations about how media practices help promote or weaken democratic norms in politically charged legal cases such as Duterte's ICC arrest.

1.1. Framing theory and the media's role in political and legal crises

Entman (1993) was the first to define ‘media framing’, which describes how media entities select and emphasize certain aspects of an event to promote specific interpretations. The media uses frames to help shape public understanding by highlighting particular themes while minimizing others, thereby influencing perception, policymaking, and societal discourse (Happer & Philo, 2013). Media framing functions on two levels: an individual cognitive level, in which audiences internalize certain meanings, and a societal one, in which framing influences public debates and policy decisions (Lim et al., 2024; Shah et al., 2004).

Studies in political communication demonstrate the influence of media framing, particularly in cases that are highly political and legal in nature (Baird & Gangl, 2006; Chiluba, 2011; Haider-Markel et al., 2006). In the context of international justice mechanisms involving institutions such as the ICC, media outlets utilize frames to situate the event within larger political narratives (Kitagawa & Shen-Bayh, 2024; Selvarajah & Fiorito, 2023). In such cases as Duterte's ICC arrest, the media's involvement goes beyond mere reporting; it plays an important role in shaping legitimacy and mobilizing public opinion (Bates & Gillooly, 2023).

Given the high stakes and gravity of Duterte's ICC case, competing frames in Philippine media outlets serve not only to inform but also to persuade, reinforcing ideological positions and influencing public discourse on governance, state accountability, and international law. The choice of sources, tone, and specific angles creates an impact on the audience's perception of Duterte's culpability or victimization. The extent of media polarization, bias, and alignment with political actors may also affect the depth and objectivity of coverage.

Given the above context, the paper aims to answer the following research questions:

1. What *frames* did Philippine print media use in covering Duterte's ICC arrest?
2. How was the *tone* of media coverage distributed across different news outlets?

2. Method

2.1. Selection of news media outlets and data collection

This study draws from three of the most prominent news media outlets in the Philippines: Manila Bulletin, Philippine Daily Inquirer, and The Philippine Star. These newspapers were selected based on their high readership, nationwide circulation, and established reputation in the Philippine media industry. According to the Media Ownership Monitor (MOM) Philippines project by Reporters Without Borders and Vera Files (2023d), these three outlets are the top print newspapers in the country in terms of audience share, making them ideal sources for analyzing media framing in national discourse.

Manila Bulletin, originally established in 1900 as a shipping journal, is the oldest existing English-language newspaper in the Philippines. It is published by the Manila Bulletin Publishing Corporation and is owned by the Yap family (Reporters Without Borders, 2023a). Over the years, the newspaper has expanded its content scope to include national and international news, business, lifestyle, and public service updates. Known for its broad coverage and longevity, Manila Bulletin retains strong brand recognition and remains a key player in both the traditional print and digital news industries.

Philippine Daily Inquirer is one of the country's leading broadsheets, established in 1985, shortly before the People Power Revolution. The newspaper is published by Philippine Daily Inquirer, Inc. and is owned by the Rufino-Prieto family. It has grown to become one of the most widely read newspapers in the Philippines, particularly in urban centers. Its history is closely tied to post-authoritarian press revival, and it has since maintained a strong national presence both in print and online through platforms such as Inquirer.net (Reporters Without Borders, 2023b).

The Philippine Star, founded in 1986, emerged during the democratic transition following the fall of the Marcos regime. It is published by PhilStar Daily, Inc. and is owned by the Belmonte family. The paper was initially positioned as a platform for post-EDSA journalism and has since evolved into one of the country's most circulated and commercially successful broadsheets (Reporters Without Borders, 2023c). It offers a comprehensive mix of news, features, and opinion columns and maintains a robust digital counterpart via Philstar.com, contributing to its accessibility and relevance in national media.

Together, these newspapers provide a rich dataset for analyzing how Philippine news media construct narratives around high-stakes political and legal events. Their prominence and longevity also ensure continuity in editorial practices and institutional memory, which allows for more grounded insights into framing trends over time.

For this study, news articles were collected over a one-month period (March 11 – April 11, 2025) following major announcements related to the International Criminal Court's (ICC) investigation and the subsequent issuance of an arrest warrant for former President Rodrigo Duterte. This timeframe was selected to capture the immediate framing and narrative construction employed by each publication, particularly during periods of heightened media attention.

The dataset includes online news articles to provide a comprehensive view of how information and perspectives were presented to readers. Articles were identified using targeted search terms such as “*Duterte arrest order*,” “*war on drugs*,” “*International Criminal Court*,” “*Duterte ICC trial*,” and “*human rights violations*.” These keywords were applied systematically across the digital archives of the selected newspapers to ensure consistency in retrieval and relevance to the research questions. Only articles written in English were included in the final dataset to maintain uniformity in analysis. From these, a total of 114 news stories comprised the sample and the unit of analysis for the study: 32 Manila Bulletin, 40 Philippine Daily Inquirer, and 42 The Philippine Star.

Each article was reviewed and coded for its dominant media frame and tone. This process allowed for both qualitative thematic coding and quantitative frequency analysis. By employing this mixed-methods approach, the study provides a nuanced account of how different Philippine newspapers framed Duterte’s ICC arrest in both form and substance.

3. Results

3.1. Dominant Media Frames

Through qualitative coding of the collected news articles, three dominant frames emerged that shaped the narrative construction of Rodrigo Duterte’s ICC arrest in Philippine news media. These frames represent distinct ways in which the media interpreted and presented the developments surrounding the ICC’s actions, reflecting broader socio-political discourses in the country.

3.1.1. Legitimacy and Accountability Frame

This frame centers on the interpretation that the ICC’s actions represent a legal and institutional effort to address allegations of human rights violations committed during the Duterte administration’s war on drugs. News articles aligned with this frame typically emphasize the ICC’s mandate to investigate and prosecute grave crimes when national systems appear unable or unwilling to act. The Philippine Star highlighted this in one article, stating:

Excerpt 1:

The ICC, which is hailed as the court of last resort, previously noted the Philippine government’s inability to adequately prosecute those responsible for the drug war killings, saying that local proceedings have not led to “tangible, concrete and progressive investigative steps.” (Chi, 2025c)

Media reports underscore that the arrest warrant is part of a formal judicial process governed by international norms and due process, rather than political intent. Several articles highlight the ICC’s attempts to remain neutral and avoid politicizing the case, portraying the tribunal as operating within its established legal framework rather than pursuing a targeted campaign against a particular leader. This is reflected, for example, in one article from the Philippine Daily Inquirer:

Excerpt 2:

The denial by the Pre-Trial Chamber of the International Criminal Court (ICC) of the motion made by Salvador Medialdea [Duterte’s legal counsel] to defer Friday’s hearing and the passive reaction of the judges to his claims that former President Rodrigo Duterte was renditioned to The Hague indicated that the tribunal avoids politicizing the case. (de Villa, 2025a)

This is further reflected in a report from the Manila Bulletin which underscored the Court’s commitment to impartiality and fairness.

Excerpt 3:

Former president Rodrigo Duterte is assured by the International Criminal Court (ICC) of fairness as the clock ticks down to Sept. 23, the day of the pivotal confirmation of charges hearing that will determine his fate in The Hague. (Geducos, 2025b)

Within this frame, international human rights organizations and legal scholars are frequently cited to contextualize the significance of the case. Articles may discuss procedural developments at the ICC, past documentation of extrajudicial killings, and victim testimonies. For instance, an article from the Philippine Daily Inquirer referenced a former associate justice of the Supreme Court as saying:

Excerpt 4:

In the end, however, it is the ICC, which has custody of Duterte, that will weigh the legality of his arrest and the seriousness of the charges against him, former Associate Justice Adolfo Azcuna told senators during a hearing on Thursday, raising doubts about the ex-president's possible release from detention. (Santos, 2025)

However, this frame does not exclude alternative viewpoints. Many reports also present responses from Duterte's legal team, Philippine officials, or constitutional experts who question the legal foundation of the ICC's involvement. An article from The Philippine Star emphasized this, citing the argument of Duterte's defense team concerning the Philippines' withdrawal from the Rome Statute.

Excerpt 5:

The defense team is expected to question the jurisdiction of the ICC over Duterte, and the implementation of the warrant of arrest against the former president, following his arrest in the Philippines. (Mateo, 2025)

3.1.2. Victimization and Political Persecution Frame

In contrast, this frame characterizes Duterte as being on the receiving end of a politically motivated campaign, involving both international actors and domestic critics. It suggests that efforts to hold him accountable are seen by his supporters as part of a broader attempt to discredit his leadership and influence. This perspective appeals to nationalist sentiment by framing the situation as an external and internal challenge to a democratically elected official. One news article from the Philippine Daily Inquirer pointed out:

Excerpt 6:

Former President Rodrigo Duterte's arrest is a "pure and simple kidnapping," according to his legal counsel and former Executive Secretary Salvador Medialdea.

Medialdea also claimed that the ICC and President Ferdinand Marcos Jr. struck an "unlikely alliance" in arresting Duterte. (Mendoza, 2025b)

Another article by the Philippine Daily Inquirer highlighted how the arrest of the former president intersected with the escalating political tensions in the country. The report situated Duterte's legal troubles within the broader context of shifting alliances and rivalries between the Dutertes and Marcoses, raising questions about the potential domestic motivations behind the timing and treatment of the case.

Excerpt 7:

His arrest in Manila came amid worsening relations between his family and the Marcos administration. President Ferdinand Marcos Jr. and Vice President Sara Duterte—Rodrigo Duterte's daughter—are embroiled in political conflict, with the latter facing an impeachment trial over allegations including an assassination plot against Marcos. (Mendoza, 2025a)

The frame often draws on statements from Duterte's allies and official sources who question the ICC's legitimacy and argue that the case is less about achieving justice and more about silencing a key political figure. Through this lens, Duterte is portrayed as a victim of coordinated retaliation and an embattled leader facing persecution for policies that resonated with ordinary citizens. In a Manila Bulletin report, for example, the coverage focused on appeals for compassion toward the former president, highlighting the human dimension of his detention.

Excerpt 8:

Former president Rodrigo Duterte's common-law wife, Honeylet Avanceña, has appealed for consideration for the detained 80-year-old former chief executive.

"Have compassion. Be compassionate. You don't have to respect him, just have compassion. Anyway, he served [the country], right?" (Manila Bulletin, 2025)

Another Manila Bulletin article also quoted Vice President Sara Duterte that her father, the former president, would be like Ninoy Aquino "who was assassinated upon his return to Manila from exile" (Geducos, 2025a).

This portrayal of Duterte as a victim has also “unleashed a flood of false information” (Chi, 2025a) from his supporters, containing spurious claims about his detention. This is evident in an article by The Philippine Star, which stated:

Excerpt 9:

Fabricated quotes from celebrities and world leaders, manipulated videos of unrelated events presented as pro-Duterte rallies, and a coordinated messaging campaign that framed his arrest as a "kidnapping" have spread rapidly across multiple social media platforms since Duterte's arrest on March 11. (Chi, 2025a)

In contrast to claims of political persecution, various groups point to Duterte’s track record of intimidating critics and fostering a climate of fear. Human rights advocates argue that his rhetoric and policies have discouraged victims and witnesses from speaking out, raising questions about the credibility of portraying him solely as a victim. As reported by the Philippine Daily Inquirer, quoting human rights lawyer Dino de Leon:

Excerpt 10:

The ex-president’s “power” and “track record of bullying and making people afraid to come forward” could also be factored in as well, he said, noting the absence of a single case against him in the Philippines. (de Villa, 2025b)

3.1.3. Sovereignty and Nationalism Frame

The sovereignty and nationalism frame centers on the ongoing debate over the extent of the ICC’s legal jurisdiction in domestic affairs, particularly considering the Philippines’ withdrawal from the Rome Statute in 2019. News items reflecting this frame highlight arguments emphasizing national autonomy and self-determination.

In a Philippine Daily Inquirer report, Senator Christopher “Bong” Go asserted that Duterte’s arrest undermined national sovereignty and insisted that the Philippine justice system is fully capable of addressing such matters. This stance resonates strongly with nationalist sentiment, especially among those who see the ICC’s actions as ignoring the principle of non-intervention in domestic affairs.

Excerpt 11:

Long-time Duterte ally and Sen. Christopher “Bong” Go maintained on Thursday that the former president’s arrest was an attack on the country’s sovereignty and that the local judicial system was fully capable of handling domestic matters. (Sigales, 2025)

The same article, however, cited the ICC’s justification, stating that Duterte’s continued influence posed risks to the investigation and the safety of witnesses and victims.

Excerpt 12:

According to the ICC arrest warrant, it was necessary to arrest Duterte because he “appears to continue to wield considerable power” despite no longer being president and due to the “risk of interference with the investigations and the security of witnesses and victims.” (Sigales, 2025)

A Philippine Star article also reflected the sovereignty frame by noting that while the Marcos administration maintains the ICC no longer has jurisdiction following the country’s 2019 withdrawal, it has nonetheless affirmed its commitment to honor arrest warrants issued through Interpol, of which the Philippines remains a member.

Excerpt 13:

Marcos administration has repeatedly insisted that the ICC no longer has any jurisdiction in the Philippines after the country withdrew its ratification of the Rome Statute in 2018 and officially left the ICC in 2019. But it has also consistently vowed to honor any arrest warrants requested by the Interpol, of which the Philippines remains a member. (Chi, 2025b)

However, this frame also includes views that acknowledge international law’s relevance under certain conditions. Some articles cite legal experts who argue that the ICC retains jurisdiction over crimes committed while the Philippines was still a party to the Rome Statute.

Excerpt 14:

Azcuna said the Philippines still had to cooperate with the ICC in implementing an arrest warrant because the country had “residual obligations” even after its withdrawal from the ICC in 2019. (Santos, 2025)

Other articles suggest that international scrutiny arises when national institutions are perceived to have failed. This was pointed out in a Philippine Star article, quoting human rights group Karapatan.

Excerpt 15:

Since the Rome Statute allows the ICC to intervene only when a state is “unable or unwilling to genuinely carry out the investigation and prosecute the perpetrators,” Karapatan said the pre-trial proceedings expose the failure of domestic redress mechanisms. (Flores, 2025a)

Figure 1 below shows the frequency distribution of the three dominant frames—legitimacy & accountability, victimization & political persecution, and sovereignty & nationalism—for each outlet:

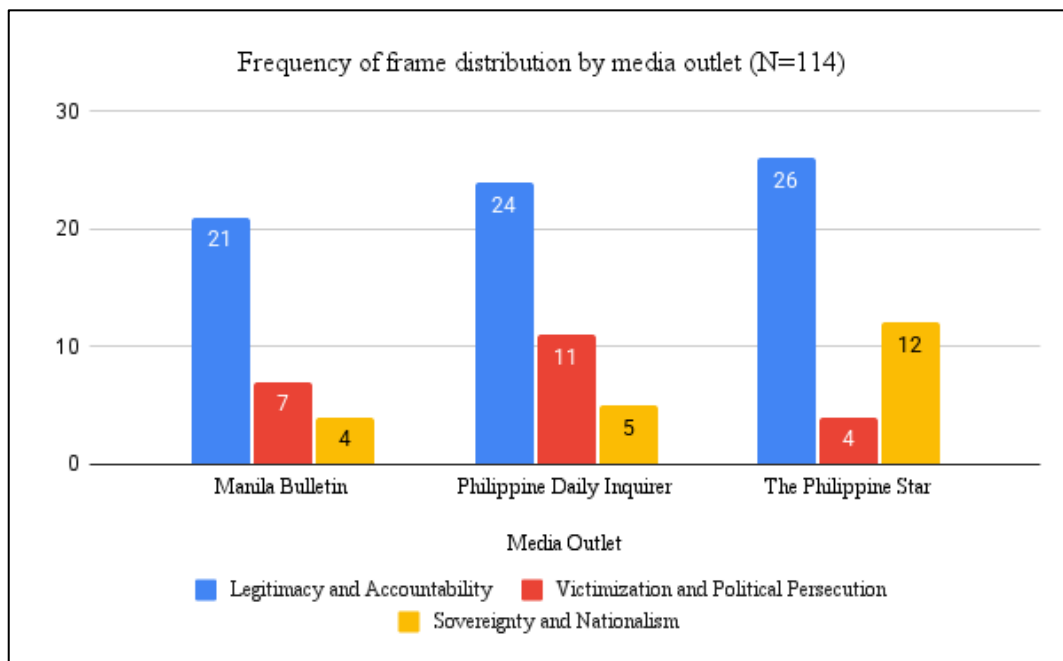


Figure 1: Frequency of frame distribution by media outlet.

3.1.4. Manila Bulletin

Manila Bulletin demonstrates a clear preference for the Legitimacy & Accountability frame, which appears in 21 (65.62%) of its articles. This suggests that the publication's coverage largely aligns with narratives portraying the ICC as a credible institution investigating Duterte for legitimate legal reasons. Such framing foregrounds international law, justice, and human rights, possibly reflecting Manila Bulletin's emphasis on official legal developments.

However, the presence of the Victimization & Political Persecution frame in 7 (21.88%) of its content indicates that the news outlet also accommodates alternative narratives that frame Duterte as being unfairly targeted by foreign powers or institutions. This dual presence implies a degree of editorial flexibility. While the paper emphasizes accountability, it also acknowledges the political dimensions of the case and Duterte's counterclaims of persecution.

The Sovereignty & Nationalism frame, present in 5 articles (12.5%), reflects Manila Bulletin's occasional engagement with the argument that international bodies should not interfere in Philippine domestic affairs. Although not a dominant theme, its appearance signals a recognition of the legal and diplomatic debates and broader discourse surrounding the country's withdrawal from the Rome Statute.

Overall, Manila Bulletin's distribution of frames suggests a moderately balanced, though still institutionally aligned, approach. It appears to uphold the value of legal accountability while offering limited space to nationalist and sympathetic Duterte narratives - perhaps to maintain its broad readership and editorial neutrality.

3.1.5. Philippine Daily Inquirer

Among the three outlets, the Philippine Daily Inquirer has the highest number of articles ($n=40$), with 24 articles (60%) adopting the Legitimacy & Accountability frame. This consistency with the dominant trend suggests that it sees Duterte's case primarily as a legal and moral issue rather than a geopolitical one. The newspaper's long-standing reputation for investigative journalism and its history of holding public officials accountable may explain its emphasis on international legal processes and human rights.

Interestingly, the Philippine Daily Inquirer allocates 11 (27.5%) of its articles to the Victimization & Political Persecution frame, which is the highest among the three outlets. This might signal a deliberate editorial decision to reflect Duterte's side of the story and the broader political discourse surrounding international justice mechanisms. By allowing space for these counter-narratives, the Philippine Daily Inquirer appears to present a more pluralistic and multifaceted view of the issue, possibly appealing to a broader audience or reaffirming its credibility as a balanced news source.

The Sovereignty & Nationalism frame appears in 5 (12.5%) of the Philippine Daily Inquirer's coverage. This suggests that while nationalist arguments are acknowledged, they are not central to the paper's overall narrative construction. The Philippine Daily Inquirer may be engaging with these frames to contextualize legal developments within ongoing debates about Philippine autonomy and jurisdiction.

The overall trend indicates that the Philippine Daily Inquirer maintains a strong commitment to legal accountability while also recognizing the political complexities of the ICC case. Its relatively high use of the victimization and persecution frame implies an attempt to capture the full spectrum of public opinion, contributing to a more nuanced and journalistically robust portrayal of the issue.

3.1.6. The Philippine Star

The Philippine Star exhibits a more distinct framing pattern compared to the other two outlets. While the Legitimacy & Accountability frame still dominates, comprising 26 (61.9%) of its articles, the most striking aspect is its significantly higher use of the Sovereignty & Nationalism frame, which appears in 12 (28.57%) of its coverage. This is more than double the proportion found in Manila Bulletin and the Inquirer, suggesting that The Philippine Star places greater emphasis on narratives defending Philippine sovereignty and resisting international legal scrutiny.

This heightened focus on sovereignty may reflect the paper's editorial leanings or an intent to engage more critically with the ICC's role in postcolonial states. It positions the ICC arrest not just as a legal issue, but as one with implications for national independence, legal jurisdiction, and the Philippines' right to self-determination. By elevating this frame, The Philippine Star may be catering to audiences that view international bodies with skepticism or who prioritize nationalist perspectives.

In contrast, the Victimization & Political Persecution frame appears in only 4 (9.52%) of The Philippine Star's articles - the lowest among the three outlets. This limited representation of Duterte's personal narrative of being politically targeted suggests that while the newspaper engages strongly with nationalist themes, it is less inclined to portray Duterte as a victim. This could indicate a preference for more structural or institutional arguments (like sovereignty) over emotionally resonant ones (like persecution), or it could reflect a more cautious stance on explicitly endorsing Duterte's defense rhetoric.

Overall, The Philippine Star presents a framing pattern that leans more toward defending national sovereignty while still acknowledging the legal and accountability dimensions of the case. Its editorial approach appears to offer a distinct voice in the media landscape, one that emphasizes the geopolitical implications of international law enforcement in the Philippine context.

3.2. Tone analysis of news articles from the news media outlets

In reporting on Rodrigo Duterte's arrest by the ICC, Philippine news media adopted varying tones that shaped how audiences interpreted both the legal process and Duterte's legacy. Tone, in this context, refers to the general attitude or orientation of a news article toward Duterte and the ICC case. For this study, coverage was classified into three tonal categories: Supportive of Duterte, Critical of Duterte, and Neutral.

3.2.1. Supportive of Duterte Tone

News articles with a supportive tone tended to emphasize Duterte's entitlement to legal protections and fair treatment throughout the ICC proceedings. Several articles underscored that the former president was "informed of his rights" (Geducos, 2025c), was "given more privileges than ordinary suspect" (Aurelio & de Villa, 2025), and was "given due process by the ICC...a normal process where a court gives a person the opportunity to respond to the accusations against him" (Ager, 2025).

Coverage also highlighted the public support Duterte continues to receive, including prayer vigils organized by allies and loyal supporters. Manila Bulletin highlighted this in one article, stating that his supporters "held a candle-lighting and prayer vigil for the former president... and performed songs, including Celine Dion's 'Immortality'" (Manila Bulletin, 2025).

In these narratives, the principle of presumption of innocence is invoked, with the argument that, like any accused individual, he has the right to a fair and speedy trial. This tone generally framed the legal process as ongoing and unresolved, cautioning against premature judgment while reaffirming his status as a former head of state deserving equal protection under the law. The Philippine star reflected this in a news report referencing the ICC Chief Prosecutor Karim Khan:

Excerpt 16:

As the international tribunal heads to the next phase of proceedings, Khan underscored that the former president is presumed innocent and will make his initial appearance before the court soon. Khan said his office's investigation is still ongoing. (Chi, 2025d)

3.2.2. Critical of Duterte Tone

Articles reflecting a critical tone often emphasized the seriousness of the charges against Duterte and highlighted how his arrest was seen as a milestone by local and international human rights watchdogs. These reports framed the event not only as a legal proceeding but also as a symbolic shift in the country's accountability landscape. A Philippine Star report, for example, described Duterte's hearing as the beginning of a protracted legal battle and a possible moment of reckoning for victims of his anti-drug campaign and state-sponsored violence.

Excerpt 17:

This hearing marks the start of a long legal battle in The Hague—an era of reckoning for victims of Duterte's brutal anti-drug campaign and other forms of state-sponsored violence during his regime. (Visto, 2025)

Some narratives drew attention to Duterte's physical appearance during his arrest, with an article from the Philippine Daily Inquirer describing him as visibly "sluggish, sleepy...appearing frail... and noticeably listless" (de Villa, 2025c), which stood in stark contrast to his previously dominant public persona. This contrast was often used to underscore the gravity of his current legal situation, which was depicted as an uphill battle with potentially long-lasting implications.

Reports with this tone frequently included statements from advocacy groups that welcomed the arrest as a long-awaited development in the fight against impunity, portraying it as a sign that even powerful figures can be held to account under international law. Another Philippine Daily Inquirer report, for example, highlighted the response of faith-based groups to Duterte's arrest, framing it as a moment of moral and social significance.

Excerpt 18:

A group of church leaders on Tuesday said that the arrest of former President Rodrigo Duterte for alleged crimes against humanity upholds “God’s gift to human dignity.” The Philippine Ecumenical Peace Platform (PEPP) said that they stand in solidarity with the families of the victims of Duterte’s drug war and that they affirm the sanctity of human life through human rights. (Sampang, 2025)

3.2.3. Neutral Tone

In some articles, a neutral stance was maintained by acknowledging that “Duterte’s arrest has been widely divisive” (Sarao, 2025), while emphasizing the importance of allowing legal proceedings to “unfold without outside influence” (Geducos, 2025d). These narratives underscored that Duterte’s fate is now in the hands of the court, not the media or public opinion. Even the former president urged his supporters “not to interfere in his case before the International Criminal Court (ICC),” as reported by Manila Bulletin (Geducos, 2025b).

The coverage often reiterated that the role of the court is to examine the evidence impartially, reinforcing that only the judges are empowered to issue a decision on the case. This tone avoids taking a firm position on guilt or innocence, instead presenting the situation as a matter of ongoing legal proceedings. As The Philippine Star reports:

Excerpt 19:

While former President Rodrigo Duterte's camp questions the legality of his arrest by the International Criminal Court (ICC), the tribunal’s spokesperson said only its judges can rule on the matter. (Flores, 2025b)

This is also echoed in another The Philippine Star article that noted:

Excerpt 20:

During the hearing, the prosecution will present evidence for each charge, while the defense may object, challenge the evidence or present its own. Based on the proceedings, the Pre-Trial Chamber will either confirm or dismiss the charges. (Flores, 2025c)

Figure 2 shows the frequency distribution of the tonal categories for each media outlet:

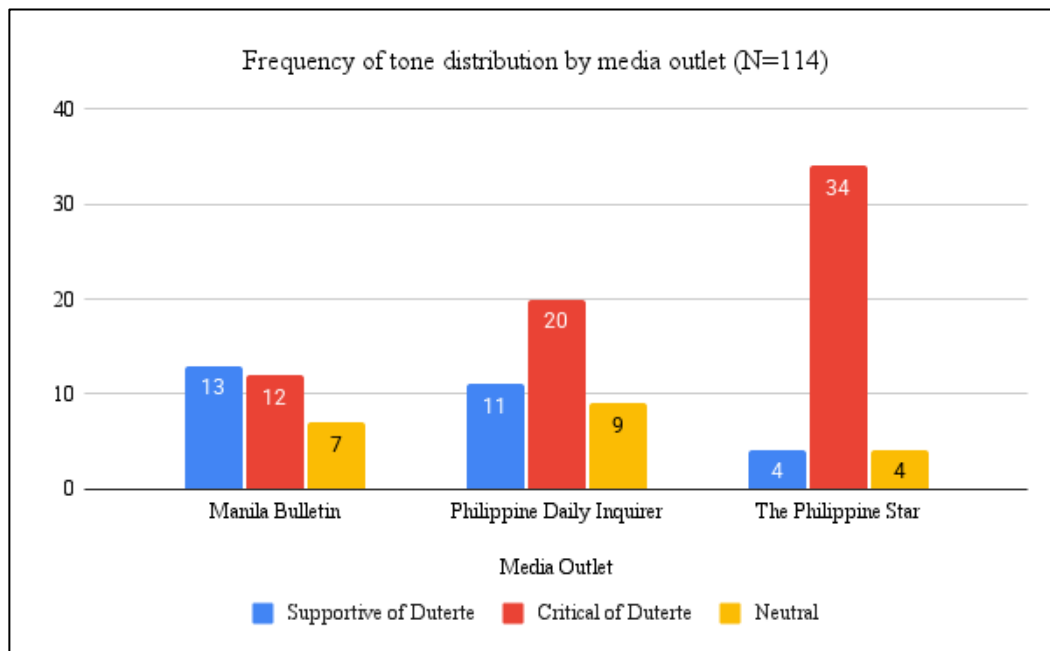


Figure 2: Frequency of tone distribution by media outlet.

3.2.4. Manila Bulletin

Manila Bulletin presented the most balanced distribution of tones among the three outlets. Of its 32 articles, 13 (40.63%) were supportive of Duterte, 12 (37.5%) critical of Duterte, and 7 (21.88%) neutral. This near-equal representation of supportive and critical of Duterte perspectives reflects an editorial approach that accommodates competing narratives while still maintaining space for neutral reportage. The relatively high percentage of pro-Duterte articles suggests the Bulletin was more receptive to Duterte-aligned framings compared to its counterparts.

3.2.5. Philippine Daily Inquirer

Philippine Daily Inquirer showed a marked inclination toward critical reporting. Of its 40 articles, 20 (50%) were critical of Duterte, compared to 11 (27.5%) that are supportive of Duterte and 9 (22.5%) neutral. The dominance of the tone critical of Duterte aligns with the Inquirer's long-standing tradition of watchdog journalism and human rights advocacy. The presence of both supportive and neutral tones, however, points to a continued effort to reflect multiple voices and maintain journalistic balance despite a clear editorial leaning.

3.2.6. The Philippine Star

The Philippine Star stood out for its overwhelmingly critical coverage. Among its 42 articles, 34 (80.95%) employed the critical of Duterte tone, which is the highest proportion among all news outlets. Only 4 articles each (9.52%) fell into the supportive of Duterte and neutral tones. This distribution suggests a strong editorial emphasis on accountability and legal scrutiny, with minimal space allocated to either sympathetic narratives or dispassionate reporting. The Philippine Star's tone distribution signals a clear positioning in favor of international justice and a critical appraisal of Duterte's human rights record.

In sum, while all three newspapers reported on the ICC case with varying degrees of critical engagement, the Philippine Star was the most critical, the Inquirer maintained a strong but more balanced opposition, and Manila Bulletin provided the most even distribution of tones, including the highest proportion of articles supportive of Duterte. These differences highlight how editorial and institutional orientations influence not just what is reported, but how it is told.

4. Summary of Findings

This study reveals how Philippine print media construct competing narratives around Rodrigo Duterte's ICC arrest, with coverage shaped by both framing strategies and tonal orientation. Across three leading news media outlets—Manila Bulletin, Philippine Daily Inquirer, and The Philippine Star—the most dominant frame was Legitimacy and Accountability, underscoring the ICC's role in pursuing justice for human rights violations linked to Duterte's war on drugs. This framing presents the arrest as a lawful and necessary response to impunity, and it aligns with international norms of legal redress and institutional oversight.

In contrast, two counter-frames—Victimization and Political Persecution and Sovereignty and Nationalism—emerged less frequently but were strategically deployed, particularly in publications more sympathetic to Duterte. The former emphasized Duterte as a target of unjust foreign intervention, while the latter stressed Philippine autonomy and challenged the ICC's jurisdiction. The Philippine Star notably elevated the sovereignty frame, highlighting postcolonial and jurisdictional concerns, while Manila Bulletin and Inquirer leaned more toward legal and rights-based perspectives.

In terms of tone, the study found that articles using tone critical of Duterte dominated overall coverage, comprising more than half of the sample. These articles framed the ICC proceedings as a necessary step toward justice and were often grounded in critical, rights-based reporting. The tone supportive of Duterte appeared in nearly a quarter of the articles, reflecting narratives aligned with political persecution and sovereign defiance. The neutral tone—marked by procedural reporting and minimal evaluative language—was the least common, suggesting that most news coverage leaned toward interpretive, value-laden accounts of the ICC investigation.

These trends varied significantly across media outlets. The Philippine Star was the most critical in tone, with over 80% of its articles adopting a critical of Duterte stance. The Philippine Daily Inquirer maintained a strong but more balanced critique, while Manila Bulletin offered the most even distribution of perspectives, including the highest proportion of pro-Duterte coverage. The framing and tone differences across outlets highlight the influence of editorial positioning on how media shape public understanding of international legal interventions.

Together, the findings point to a polarized media landscape and underscore the complex role of Philippine media in navigating between journalistic responsibility, political narratives, and democratic accountability in the face of global legal scrutiny.

5. Conclusion, Implications, and Future Directions

The findings above reveal implications significant for press freedom and democratic accountability. First, the diversity of frames and tones suggests that despite mounting political pressure during and after Duterte's administration, Philippine news media outlets have retained a degree of independence in voicing dissent and engaging with international legal discourse. The prevalence of critical framing and tone—especially in The Philippine Star and Philippine Daily Inquirer—demonstrates the press's potential as a watchdog in democratic society. However, the presence of pro-Duterte and sovereignty-focused narratives also highlights the persistent vulnerability of media to nationalist rhetoric and political influence, which may hinder public understanding of global justice mechanisms.

From a democratic standpoint, the media's ability to present multiple narratives—particularly those centered on accountability—can help cultivate a politically literate public that is attuned to the consequences of state violence and the demands of transitional justice. At the same time, the unequal distribution of tone and framing across media outlets underscores the need for greater scrutiny of media ownership, editorial autonomy, and structural biases that shape reporting in high-stakes political and legal contexts.

Future research can expand on this study by examining broadcast and digital media platforms, where audience reach and engagement may differ significantly from print. Additionally, longitudinal studies could track how framing and tone evolve as the ICC investigation progresses or as political administrations change. Ultimately, comparative analyses with other countries facing ICC scrutiny may also yield insights into how national media systems mediate between global justice institutions and domestic political dynamics.

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