

EUROPEAN POLICY BRIEF



FOUR PRINCIPLES FOR ADDRESSING TRAFFICKING, FORCED LABOUR AND/OR SLAVERY (TFLS) IN SUPPLY CHAINS

Efforts to combat human trafficking, forced labour and/or slavery (TFLS) have been expanding for nearly two decades. More recently, TFLS is being addressed in and through supply chains. This Policy Brief draws on a mapping exercise of initiatives at the TFLS-supply chain nexus as well as three field-based case studies and the input of a stakeholder advisory board to identify four key policy issues: 1) the question of responsibility and liability in supply chains; 2) enforceability of initiatives; 3) prospects for worker participation; and 4) the role of public regulation to protect workers' and migrants' rights and labour standards

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INTRODUCTION

There have been significant policy reforms and private initiatives implemented worldwide over the last decade and a half to address (human) trafficking, forced labour and/or slavery (TFLS) as well as shared commitments to address these issues, such as Target 8.7 of the UN Sustainable Development Goals. Yet there is little evidence that practices associated with TFLS have abated. New approaches are clearly necessary if these goals are to be achieved. An area of growing activity is around TFLS in supply chains – both due to the growing inclusion of TFLS in Corporate Social Responsibility (CSR), and conversely, the turn to supply chains within anti-TFLS work. Supply chains, in turn, are potentially important avenues of change for two reasons. First, supplier firms and others compete for roles within global supply chains. As such, they are subject to a range of pressures from lead firms such as fluctuating orders, rapid delivery time, and stringent quality standards (as well as the need to meet environmental and social standards). The drive to meet such pressures within fragmented and dispersed supply chains is one of the *causes* of practices associated with TFLS. On the flip side, supply chains represent an *opportunity* for lead firms and others to address practices associated with TFLS. For the European Union (EU) and other multilateral bodies, supply chain initiatives therefore represent an avenue for addressing TFLS both within and beyond the jurisdiction of their Member States.

In this Policy Brief, we seek to draw out four key policy implications based on our analysis of the data generated through a mapping exercise of 97 initiatives at the TFLS-supply chain nexus and three field-based case studies (see Research Parameters section below). While some initiatives

have been examined in more depth than others, our task has not been to systematically evaluate any of the initiatives. Rather, we reflect on what is likely to make an initiative successful or unsuccessful in bringing about change. This is not to deny the need for rigorous evaluation which has been highlighted by Hames et. al. (2010) and Vogel and Cyrus (2017). Given the rapid proliferation of initiatives at the TFLS-supply chain nexus, our research has taken on the more preliminary task of understanding the characteristics of this field of intervention, from which some initial but important policy findings can be drawn. This research forms part of the overall DemandAT project (see demandat.eu) on addressing the demand side of trafficking. The Policy Brief covers four issues: **1) the question of responsibility and liability in supply chains; 2) enforceability of initiatives; 3) prospects for worker participation; and 4) the role of public regulation to protect workers' and migrants' rights and labour standards**

EVIDENCE AND ANALYSIS

1) The question of responsibility and liability in supply chains:

When evidence of TFLS is identified within a supply chain, many firms respond by pointing to suppliers' unauthorised subcontracting (see LeBaron 2014) and/or governments' inadequate enforcement of labour laws. In so doing, firms are seeking to protect themselves from two intersecting risks: liabilityⁱ and reputational risk. If we are to effectively address practices associated with TFLS, however, we need to move towards a broader notion of responsibility, one which includes the idea that if we benefit from injustices we have a duty to address these. The OECDⁱⁱ Guidelines for Multinational Enterprises, for example, state that firms should '*contribute to the elimination of all forms of forced or compulsory labour*' (emphasis added). Making ethical choices need not come at the expense of profitability; while investment may be necessary at the outset, there are likely to be returns on this investment. Committing to transforming labour relations and labour conditions along the supply chain would radically reduce the risk of TFLS and therefore limit potential liability and reputational damage for businesses. Indeed, the experience of the Fair Food Program (outlined below) demonstrates the efficacy of a 'high road' approach: firms associated with the programⁱⁱⁱ have benefited economically from market incentives and increased stability of the workforce.

Lead firms should therefore assume responsibility for identifying and changing the systemic factors leading to practices associated with TFLS as well as providing remedies to affected workers and communities. Where industries and/or source regions are characterised by poor labour practices and/or TFLS, there is a particular responsibility to take proactive measures. In some cases, companies may choose to avoid sourcing specific goods from particular regions in light of such concerns – but they should also consider whether it is more appropriate to: ensure that potential suppliers have adequate resources to provide decent working conditions; choose suppliers with credible social certification; and/or support suppliers to achieve such certification.

The growing number of initiatives at the TFLS-supply chain nexus reflects an increasing expectation that firms, along with governments and civil society, share responsibility for the issue. Many of the initiatives we identified, however, are only a first step. Our analysis of 97 initiatives at the TFLS-supply chain nexus reveals that much of the activity relates to *supply chain monitoring* and *employer guidance*, often in combination. Examples include the introduction of (industry-wide or multi-industry) language or standards around TFLS in supply chains, tools to identify (the risk of) TFLS in supply chains, and written guidance on indicators of TFLS. Thus the most common area of activity involves defining, identifying and reporting on TFLS in supply chains. Alongside this, we have also observed a proliferation of trainings and consultancy around TFLS in supply chains. This area of activity represents the integration of concerns around TFLS into the broader field of Corporate Social Responsibility (CSR) – providing only a platform for change from which further actions might be taken. More substantive actions are needed.

In this regard, we note another area of rapidly increasing activity around labour market intermediaries. Many lead firms have identified an increased risk of TFLS associated with the outsourcing of employment by supplier companies and/or recruitment fees paid by workers to

access jobs in supplier companies which create indebtedness. For example, in the wake of a report documenting widespread forced labour among migrant workers in the electronics industry in Malaysia (Verité 2014), there has been a rapid shift towards requiring suppliers to: transition to direct employment of workers; prohibit the payment of recruitment fees by workers; and reimburse recruitment fees to workers where they have been paid. This is reflected in actions taken by Apple, Hewlett Packard and the Electronic Industry Citizenship Coalition. This is not limited to the electronics industry: Patagonia, for example, had instituted similar requirements in their 2014 Migrant Worker Standard while a recent report by Walk Free (2014) recommends these requirements as part of all Codes of Conduct (see IHRB 2013 for further examples). While the future of the Trans-Pacific Partnership is uncertain, the proposed agreement would require Malaysia to address recruitment fees and practices. This is a welcome trend which begins to acknowledge the contributions and sacrifices made by workers within fragmented and dispersed supply chains.

It is not yet clear, however, whether or how lead firms instituting such requirements of suppliers will contribute to the direct costs of recruitment. Beyond the direct costs, however, the aim of eliminating recruitment fees and eliminating the outsourcing of employment is to address the power imbalances which leave workers vulnerable to abusive and exploitative practices. Thus there is a related question about improving wages and working standards; again, it is not clear whether lead firms will respond to this dynamic by taking on some additional costs, or how they might do so. Thus while we welcome policies which require suppliers to prohibit the payment of recruitment fees by workers and to hire workers directly, this needs to be matched by a commitment to share the costs of compliance and the commitment to ensure decent work and payment. Policy can play a key role in these dynamics through regulation of subcontracting. Voluntary principles such as the United Nations' (UN's) Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises can be built up on moving towards a legally binding instrument^{iv} which includes lead firms but also other actors in the supply chain.

2) Enforceability of initiatives:

While there are only a handful of initiatives mandating disclosure of information from companies, this is an important area to consider as it is likely to grow. We note with concern that clear enforcement mechanisms and significant consequences appear to be missing in some of these. The California Transparency in Supply Chains Act and the supply chain provisions of the UK's Modern Slavery Act have both garnered significant attention, requiring major firms to provide information on their efforts to combat trafficking and/or slavery in their supply chains. The innovative aspect of these laws is that they apply to the whole supply chain, including business conducted abroad. While we cannot yet evaluate the impact of these laws, scholars have formulated significant critiques; analyses suggest that neither law is likely to ameliorate or eradicate forced labour and human trafficking (Eckert 2013; Prokopets 2014) and that a high percentage of statements submitted in accordance with the UK Modern Slavery Act are superficial (Ergon Associates 2016:1). Overall, preliminary analyses therefore suggest that on their own and *in their current form* disclosure requirements are unlikely to have a substantial impact.^v

The key issue here is that these laws do not stipulate enforcement mechanisms through which companies covered by them would suffer any significant consequences for failure to change conditions within their supply chains. Yet it is possible to go further than the California and UK disclosure legislation, as demonstrated in Brazil where targeted and effective labour inspections have been combined with forward-thinking legislation and civil society initiatives. Over the course of two decades, 45,000 workers have been 'liberated' from degrading conditions, exhaustive workdays, and restrictions on their mobility (MPT 2015), mainly thanks to a dedicated team of labour inspectors carrying out specialised inspections in response to complaints or suspicions of 'slave labour' (as it is referred to in the country). In 2003 the government began publishing a 'Dirty List' of companies and individuals responsible for slave labour. This has served as an important reference point for the National Pact to Eradicate Slave Labour, launched in 2005. Through the Pact, major companies have pledged not to use suppliers appearing on the list, with banks similarly pledging not to extend finance to those on the list. Public finance bodies such as regional development banks have instituted similar policies. The National Pact has clear enforcement mechanisms with significant consequences. Appearing on the 'Dirty List' may mean losing a significant share of a firm's market and/or losing crucial access to finance. Signatories to the

National Pact can be, and have been, temporarily suspended or definitively excluded from the Pact for failing to make changes within their supply chains to address slave labour (also see below on the Fair Food Program). The government has recently ceased to update the list as a result of legal battles (with updates being published by the NGO Repórter Brasil^{vi} in the interim) and the current Temer administration is likely to reverse some of the government efforts to combat slave labour. Brazilian civil society should be supported in attempts to secure and advance the gains that have been made (Douglas 2016), but it also continues to be the case that there is much to be learned from the Brazilian experience, and this has been recognized internationally (Costa 2009).

The importance of clear enforcement mechanisms with significant consequences for non-compliance is a lesson which applies not only to disclosure initiatives, but also more broadly to the diverse field of initiatives which has emerged at the TFLS-supply chain nexus. Efforts to address TFLS in supply-chains are unlikely to be effective without an enforcement mechanism, and one with significant consequences for violations or failure to achieve targets.

3) Prospects for worker participation:

We would first note that International Framework Agreements (IFAs) negotiated between Global Union Federations and Transnational Corporations (excluded from our inventory of 97 initiatives as they form a clear category in their own right) are potentially important initiatives at the TFLS-supply chain nexus. They commonly reference core labour standards including freedom from forced labour. First, by signing IFAs, companies make a contractual agreement to address labour violations within their supply chains, thus increasing their own liability for such violations. Secondly, however, IFAs promote freedom of association and the right to collective bargaining, thus paving the way for workers to combat practices associated with TFLS. IFAs are high-level agreements which (by design) need to be followed up with on-the-ground worker organising and mobilisation if they are to achieve their full potential.

Beyond this, while many initiatives we identified were multi-stakeholder (for example, involving a non-governmental organization and a company), only two were initiated and/or implemented by trade unions (the 'From Catcher to Counter Program' targeting fisheries and the Fair Games – Fair Play campaign focused on construction), with one additional initiative implemented by a worker-based human rights organisation (described below). Only these three initiatives, together with one more initiated by an NGO-trade union alliance (the Clean Clothes Campaign), rely on worker organising as a key mechanism by which the initiative would function. A recent initiative to address child trafficking in fishing carried out by the General Agricultural Workers Union (GAWU) in Ghana^{vii}, the Torkor model, has demonstrated the progress that can be made by engaging workers, employers and local communities: according to the union, 2,000 children have been moved from hazardous work, usually as a result of trafficking, into education. These appear to be the exception. While some initiatives incorporate worker training or even 'participation', few involve on-the-ground worker organizations in the design, implementation and monitoring of the initiatives. These results are striking given the widespread recognition for the work of the Coalition of Immokalee Workers (CIW)^{viii} and the model of Worker Driven Social Responsibility (WSR) that they have pioneered.

In the Fair Food Program (which resulted from the Campaign for Fair Food, launched in 2001 alongside CIWs Anti-Slavery Program), workers have been involved in the design of an industry-wide Fair Food Code of Conduct to reflect the on-the-ground realities they face. The Code forms the basis of 'negotiated bilateral agreements with national and international retail brands (fast food chains, food service companies and supermarkets)' (Brudney 2016: 352). Workers are also central to its implementation and monitoring through complaint-driven investigations. The third-party monitoring of the agreements by the Fair Food Standards Council relies on a more extensive evidence base than is typical of standard CSR audits, and there are market consequences for non-compliance: participating buyers are required to suspend purchases from growers who have failed to comply with the Code (see also Parella 2014). Central to the program is a Fair Food Premium, which participating buyers commit to pay and which is received by workers as a line-item bonus in their paychecks. This has led to impressive progress in addressing 'slavery in the fields,' extremely low wages, health and safety risks and sexual harassment. In relation to the discussion of labour outsourcing above, it is also notable that the Code mandates direct employment of both farm labour contractors and agricultural workers.

Workers are best placed to articulate the factors which lead to a situation in which their mobility is constrained and the specific practices which harm them or risk doing so. Therefore, genuine worker participation contributes to better design, implementation, and enforceability of initiatives. Wherever possible, trade unions and other workers' organizations should therefore be substantively involved in formulating, implementing and monitoring initiatives at the TFLS-supply chain nexus. Yet to date, the rapid expansion of initiatives at the TFLS-supply chain nexus is not characterised by such involvement. In the short term, international organizations may play a role in contexts where this is more challenging, while longer-term efforts to promote labour rights and standards are also important^{ix}. Yet, the challenges do not fully explain the relative neglect of worker organizations in the design of many initiatives. We therefore recommend greater involvement of worker organizations in existing and future initiatives at the TFLS-supply chain nexus.

4) The role of public regulation to protect workers' and migrants' rights and labour standards:

Practices associated with TFLS in supply chains do not take place in a vacuum. Where evidence of such practices emerge, they are often the tip of the iceberg, revealing that labour rights are not being protected and labour standards are not being enforced. In an overall environment where workers are not able to exercise freedom of association, nor to ensure that their health and safety is protected, nor to obtain a living wage, it is more likely that practices associated with TFLS will emerge. Preventing practices associated with TFLS thus necessitates a commitment to protecting a wider range of labour rights and labour standards.

As discussed above, working through supply chains is a critical pathway for protecting labour rights and improving labour relations and labour conditions. Yet, while private initiatives can complement and reinforce public regulation, they cannot substitute for it. An adapted version of Shamir's (2012) recommendations for a 'labour paradigm,' adapted here, offers a useful starting point for considering how public regulation of labour and employment impacts practices associated with TFLS:

1. Eliminate 'binding arrangements' such as tied visa (guestworker and kafala) schemes
2. Guarantee the right to unionize
3. Extend and enforce the application of labour and employment laws
4. Reduce recruitment fees and the power of middlemen
5. Ensure that migrant workers have access to labour rights

In Qatar, for example, the kafala sponsorship system, centred on visas tied to a specific employer (reinforced by other rules requiring permission from employers to leave the country and prohibiting membership in unions), guarantees that workers become highly dependent on their employer and thus have little effective access to justice in the arena of labour rights and standards. There is a broad consensus that the system 'facilitates forced labour and a range of other abuses' (Amnesty International 2015).

In India, the proposed Labour Code on Wages Bill 2015 allows for a range of deductions and allowances from workers' salaries, practices strongly associated with forced labour (see Bhattacharjee pp. 49-50). The problem also occurs 'at home' in Europe. One example from the UK is that while the Modern Slavery Act was adopted in 2015, this was only shortly after the domestic worker visa was modified in 2012 to tie workers' status to an individual employer, in spite of complaints that this would contribute to 'modern slavery' (see Ewins 2015; DemandAT 2016). Rather than undermining anti-TFLS measures with policies that erode the rights of migrants and other workers, anti-TFLS initiatives should be accompanied by broader efforts to protect, extend and enforce labour rights and labour standards. The last recommendation in Shamir's paradigm noted above has been expanded from her initial proposal, which was restricted to workers reporting violations. This is because low levels of reporting suggest that the order needs to be reversed: a commitment to ensuring labour rights and standards for all migrants is required to allow more workers to speak up.

In Jordan, for example, migrant workers were barred from membership in unions until the law was changed in 2010, thanks to advocacy by trade unions. In the garment industry, where a majority of workers are migrants, the General Trade Union of Workers in Textile, Garment and Clothing Industries has since negotiated a collective agreement covering migrant workers (who are still not fully covered by labour law) and are now working to implement the agreement. The union reports^x that in the course of their work, they regularly identify trafficked workers in the garment sector as well as other sectors who they refer to official channels.

Concerns around TFLS *and broader labour rights and standards* can also form part of trade, aid and diplomacy carried out by governments and multilateral bodies. Again, there have unfortunately been cases where the opposite is true, as in the World Bank's Doing Business Indicators which 'proclaimed a wide range of labour regulations to be nothing more than a hindrance to investment' and 'gave highest ratings and best rankings to countries having the least labour regulations' (Bakvis 2009:419,425; see also Benjamin et al. 2010, Lee et al. 2008, and Berg and Cazes 2008). As noted above, however, many bilateral and multilateral trade agreements reference core labour standards. A law passed in the US in 2016 is also notable for closing a major loophole in the 1930 Tariff Act – which prevents the import of goods made with convict, forced and/or indentured labour. Anyone with reason to believe that merchandise produced in violation of the Act is being or is likely to be imported may contact the Customs and Border Protection agency. Such trade-related measures offer an important tool for advocates. However, they are also at risk of being used instrumentally to achieve unrelated political or trade-related aims. The first seizure of goods resulting from the amended Tariff law over allegations of prison labour, for example, was of soda ash from China. Soda ash from China was simultaneously the object of a trade dispute (Fernholz 2016) and subsequent seizures under the Act all appear to have been from China (CBP 2016).

A final area we expect to grow in this regard is institutional procurement, as there appears to be significant interest in building upon existing and recent initiatives (OSCE 2016). The US Federal Government is often cited as the world's largest purchaser (and has acted in this area through Executive Orders and Federal Acquisition Regulation). The EU itself has also identified this as an arena for action through Directive 2014/24/EU. Other governments and public bodies (such as universities and international NGOs) are also acting in this area and more may wish to institute policies around TFLS in regards to their institutional purchasing practices. Institutional procurement offers a promising arena in that governments and other large purchasers can leverage buying power more immediately than individual consumers are able to. The challenges in this arena relate to the information upon which such decisions might be made (e.g, who gathers it, at what level of detail, and on what basis) and the degree to which corporations in turn are knowledgeable and transparent about their supply chains. Institutional procurement, then, should be geared towards ongoing engagement and improvement.

POLICY IMPLICATIONS AND RECOMMENDATIONS

1) It is time to go 'beyond compliance' to responsibility for ethical supply chains

In order to effectively tackle practices associated with TFLS in supply chains, responsibility must be understood to include not only culpability and liability, but the duty to address injustices from which we might benefit. Lead firms should take responsibility for improving conditions for workers within their supply chains – and policy should promote this.

2) Initiatives need to be enforceable and have significant consequences:

Voluntary efforts to address TFLS in supply-chains are unlikely to be effective without enforcement mechanisms which result in significant consequences for violations (or failure to achieve targets).

3) Genuine worker participation is critical:

Wherever possible, trade unions and other workers' organizations should be substantively involved in formulating, implementing and monitoring initiatives at the TFLS-supply chain nexus.

4) Public regulation to protect workers' and migrants' rights and labour standards is crucial:

Practices associated with TFLS in supply chains do not take place in a vacuum. Addressing them necessitates a broader commitment to labour rights and labour standards. Private initiatives can complement and reinforce public regulation, but not substitute for it.

RESEARCH PARAMETERS

As outlined in our Working Paper (McGrath and Mieres 2017), our research has sought to identify initiatives (policies, programs and other actions) which address TFLS in and through supply chains. Only initiatives which include a substantive focus on both TFLS and supply chains have been included in our data collection and analysis. The following typically reference Core Labour Standards, including freedom from forced labour: International Framework Agreements (IFAs) negotiated between Global Union Federations (GUFs) and Transnational Corporations (TNCs); bilateral and multilateral trade agreements; and individual company codes of conduct. In addition to these, our research has identified 97 further initiatives at the TFLS-supply chain nexus. The initiatives are diverse: a range of actors (companies, NGOs, governments, multilateral bodies, etc.) are involved in these initiatives, they are being developed and applied in various industries, they operate at different scales and in different locations, and they take a number of forms. In order to understand this diversity, we have classified the initiatives according to these factors. To further consider the implications of these diverse initiatives, we have conducted three case studies investigating how selected initiatives are playing out on the ground. Each case study has involved a period of fieldwork: electronics in Malaysia; construction in Qatar; and agriculture in the US.

Endnotes

ⁱ Two recent reports have outlined the potential ways in which companies may be liable for TFLS in their transnational supply chains (IHRB 2016; Human Rights First 2016) Of note is that the Council of Europe Convention on Action Against Trafficking in Human Beings requires each party to ensure that 'any legal person (including a company) can be held liable for a criminal offence that is committed for its benefit' (IHRB 2016:8).

ⁱⁱ Organisation for Economic Co-operation and Development

ⁱⁱⁱ Participating buyers in the program include companies based in Europe such as Sodexo and Compass. See: <http://www.fairfoodprogram.org/partners/>

^{iv} The UN Human Rights Council, in its resolution 26/9, has established an intergovernmental working group 'to elaborate an international legally binding instrument to regulate, in international human rights law, the activities of transnational corporations and other business enterprises.' The International Labour Organisation, in its 2016 'Resolution concerning decent work in global supply chains' has also committed to 'identify the salient challenges of governance to achieving decent work in global supply chains' and 'consider what guidance, programmes, measures, initiatives or standards are needed to promote decent work and/or facilitate reducing decent work deficits in global supply chains' which may also include consideration of a legally binding instrument.

^v These laws may also be used creatively by advocates to take advantage of and perhaps strengthen the interpretation of the Acts, such as in the class-action lawsuits filed by consumer rights firm Hagens Berman, under the California Act (Reuters 2015). The impact of related efforts thus needs to be monitored alongside the direct impacts of the laws.

^{vi} A representative of this organization serves on the Advisory Board for this research project.

^{vii} A representative of this organization serves on the Advisory Board for this research project.

^{viii} Representatives of this organization serves on the Advisory Board for this research project. CIW's work has received the 2015 Presidential Medal for Extraordinary Efforts Combatting Modern-Day Slavery, the 2014 Clinton Global Citizen Award, the 2013 Franklin D. Roosevelt Freedom from Want Medal, the 2003 Robert F. Kennedy Human Rights Award and the 2010 Hero Acting to End Modern-Day Slavery Award among many other recognitions. For a full list of their awards, see: <http://www.ciw-online.org/highlights/>

^{ix} See below.

^x A representative of this organization serves on the Advisory Board for this research project.

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PROJECT IDENTITY

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