



# **EUROPE REGIONAL FORUM 2025**

Efforts to
Eliminate Forced
Labor and Child
Labor: Sharing
Progress and Best
Practices in Europe
and Globally

DATES: MAY 5-7 2025

**LOCATION: BRUSSELS, BELGIUM** 



# TABLE OF CONTENTS

Introduct	<u>ion</u>	
<u>Europe R</u>	egional Forum	
The Planr	ning of the Forum	
<u>Day One</u>		
Forum (	<u>Opening</u>	
<u>Keynote</u>	: Regulatory Measures on Forced	<u>Labor in Europe</u>
	etting: Understanding the Current bor and the Pathfinder Framewor	·
Panel Di Child La	scussion: Engaging Survivors in Adbor	ddressing Force Labor and
Panel Di Way For	iscussion: Forced Labor Ban Regul ward	ations - Challenges and the
	op: Best Practices for Research on Trafficking	Modern Slavery and
	op: Exploring Cross-National and Cort Ban and Other Measures on Fo	
<u>Regiona</u>	l Challenges Identified on Day One	<u> </u>
<u>Propose</u>	ed Solutions to the Identified Chall	<u>enges</u>
Reception	on Honoring Anousheh Karvar	
<u>Day Two</u>		
<u>Openin</u> g	<u>g Remarks</u>	
<u>Keynote</u>	: Harnessing the Promise of SDG 2	2030
	scussion: Textile Industry, Fast Fast on: the Complicated Fight Against	•

# TABLE OF CONTENTS

Panel Discussion: Strategies for Sustaining the Current Funding Landscape to Address Forced Labor, Child Labor, and Trafficking in Persons	51	
Panel Discussion: Debunking Myths Around Mandatory Human Right Due Diligence (MHRDD)	<u>s</u> 58	
Workshop: A1 Best Practices for Community Grievance Mechanisms and Remediation	6	
Workshop: A2: Engaging Survivors in Policy Framework Development	64	
Regional Challenges Identified on Day Two	67	
Proposed Solutions to the Identified Challenges	68	
<u>Day Three</u>	69	
<u>Opening Remarks</u>	70	
Keynote: Reframing Modern Slavery in Europe	73	
Panel Discussion: Addressing Forced Labor and Child Labor in the Agricultural Supply Chain	77	
Panel Discussion: Coordinating Multi-Stakeholder Efforts in Global Supply Chains	82	
Summary of Insights from the Europe Regional Forum	87	
Closing of the Forum	90	
Regional Challenges Identified on Day Three	91	
Proposed Solutions to the Identified Challenges	93	
Outcomes of the Forum		
Action Steps		
Particination and Evaluation		

# FREEDOM FROM SLAVERY FORUM SERIES



The Freedom from Slavery Forum was launched in 2013 to unite antimodern slavery leaders worldwide, foster collaboration and the sharing promising practices, while advancing a collective agenda for action. Over the years, participants have forged strong partnerships prioritized joint advocacy and efforts across sectors. In 2021, the Forum was expanded from an annual Global Forum to include a series of Regional Forums. The 2022-2023 forums were held both virtually and in person, increasing accessibility and elevating voices within grassroots the movement. In 2024, the Europe Forum became an independent event, resulting in a total of seven regional forums -three in person events in North America, the Caribbean, and Europe- and four online events gathering stakeholders in Latin America, Asia, Africa, and MENA. 2025 features one Regional Forum, the Europe Regional Forum, which is now an annual event, and the 2025 Global Forum which will be held in Paris. France in November 2025.

# **SPECIFIC OBJECTIVES OF THE FORUMS**



The objectives of the Regional Forums are to explore and define critical strategies for local engagements, identify the best approaches to revitalize the movement, increase resilience and resistance to modern slavery, and determine how these engagements may inform the global synergies. The Forum is a collegial space to unite stakeholders and strengthen the anti-modern slavery movement. The panels and workshops discuss opportunities, challenges, practices, strategies, and actions to eradicate modern slavery in the regions.

# **EUROPE REGIONAL FORUM**



Held from May 5 to 7, 2025, the Europe Regional Forum centered around the theme: "Harmonizing Efforts to Eliminate Forced **Labor and Child Labor: Sharing Progress** and Best Practices in Europe and **Globally."** The forum was convened by Free the Slaves in collaboration with Belgium's Public Service of Foreign Affairs, Foreign Trade and Development Cooperation. It gathered 74 participants, including lived experience experts, representatives of civil society organizations, governments, academia, and other experts stakeholders from across the European region.

Brussels, Belgium

May 5 - 7, 2024

Harmonizing Efforts to Eliminate Forced Labor and Child Labor: Sharing Progress and Best Practices in Europe and Globally

The forum's agenda was structured around three daily themes:

Day One

Paving the Path to Change

**Day Two** 

Accelerating the Global Agenda

**Day Three** 

Strategizing for Impact

### THE PLANNING OF THE FORUM

Free the Slaves served as the secretariat for the 2025 Europe Regional Forum, which was coproduced in partnership with Belgium's Public Service of Foreign Affairs, Foreign Trade and Development Cooperation. The Government also Belgium generously hosted the event at Egmont Palace in Brussels. The theme, agenda and details of the developed forum were in collaboration with the Forum Planning Committee. We are deeply grateful to all members of the Forum Committee, Planning whose collaboration was essential to the success of the event.

The Forum was organized under the Chatham House Rules. Therefore, in the report that follows, the discussion points, key takeaways, and quotes will not be attributed to individual speakers to ensure the confidentiality of the participants, except for those who have given permission. Similarly, the photos on each page may not directly correlate to the session on the page.



## FORUM PLANNING COMMITTEE



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### Day One

### **OVERVIEW OF SPEAKERS**

- Karvar, Anousheh Government of France
- Mbouzie, Angelique Government of Cameroon
- Neijens, Tom Government of the Kingdom of Belgium
- Ipate, Raluca European Commission
- Rafaela, Samira Former Member of the European Parliament | University of Cornell
- de Franchis, Laura The Alternatives Factory
- de Rengerve, Hélène Human Rights Watch
- Ewart-James, Joanna Freedom United
- González de Aguinaga, Sofía BIICL
- Lea, Sian Anti-Slavery International
- McCarthy, Timothy Patrick Free the Slaves
- Morgan, Jeff SUCDEN Trading
- Myatiev, Ruslan Turkmen News
- Omoruyi, Juliet MIST
- Pommier, Maud MIST
- Qadri, Mustafa Equidem
- Rachmawati, Ira ITUC, Belgium
- Waruzi, Bukeni Free the Slaves
- Yohannes, Hyab University of Glasgow
- Zafar, Faiza Rights Lab, University of Nottingham



### **FORUM OPENING**

The 2025 Europe Regional Freedom from Slavery Forum opened in Brussels with a strong call to action: modern slavery persists not because of a lack of commitment, but because of fragmented responses. A more united movement is needed to effectively combat modern slavery in all its forms.

To open the Forum, participants were welcomed to the historic Egmont Palace, grounding the event in Belgium's long-standing commitment to fighting human trafficking and forced labor. Speakers described Belgium's strategy for addressing modern slavery, centered on dismantling trafficking networks, enhancing multidisciplinary cooperation, and establishing a national coordination center for trafficking and smuggling. They also emphasized the local and global nature of Europe's leadership. As a region with considerable consumer spending power, political influence, and regulatory reach, the continent bears responsibility for advancing policy, aligning standards, and protecting victims not only within its borders but across global supply chains. Current EU frameworks and intergovernmental initiatives were shared as examples of how policy can be leveraged for meaningful, systemic impact.

The attention then turned to the evolution of the Freedom from Slavery Forum. From its origins as a small gathering of leaders at Stanford University, convened by its founder Dan Elkes, to its expansion into the current series of regional and global convenings, the forum has grown into a platform that centers survivor leadership, fosters cross-sector collaboration, and promotes localized solutions.



Speakers also acknowledged the increasingly complex environment in which antimodern slavery efforts now operate. While advocacy efforts are advancing, global crises, shrinking civic space, and economic pressures continue to drive vulnerability. The forum, therefore, is not a symbolic event but a strategic space to forge connections, share knowledge, and chart concrete next steps. It presents the opportunity to acknowledge that no single actor holds the solution and to commit to building collaborative advantages through a shared vision, collective action, and ongoing partnership development. Governments, businesses, NGOs, and survivors all have a role to play. The next three days were presented not just as dialogue, but as an opportunity to commit to action, partnerships, and a shared vision of ending modern slavery in all its forms.

### **KEY TAKEAWAYS**

### **Kingdom of Belgium's Leadership**

Belgium reaffirmed its role in combating human trafficking through a robust national policy and an upcoming coordination center intended to unify law enforcement and civil society efforts.

### **European Institutions' Importance**

The EU plays a key role in establishing legal and policy frameworks to combat modern slavery.

# The Forum's Role in Strengthening the Movement and Collaboration

Amid growing global challenges, the Forum serves as a vital platform to revitalize and strengthen the movement against modern slavery. Its planning committee, comprised of representatives from governments (France, UK, Belgium), businesses, and NGOs—reflects a deliberate commitment to fostering multi-stakeholder collaboration.

### **KEYNOTE: REGULATORY MEASURES ON FORCED LABOR IN EUROPE**

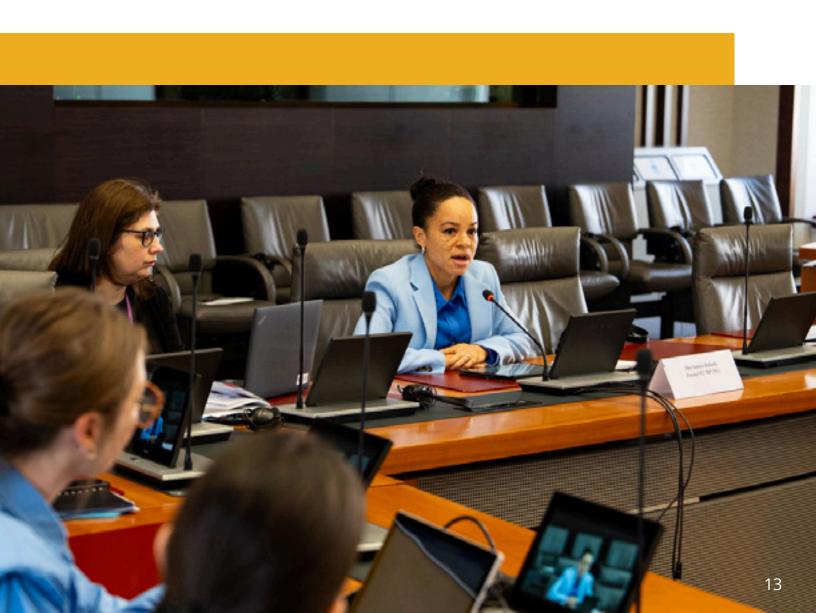
The keynote speaker delivered a focused and urgent address on the European Union's evolving legal tools to combat forced labor. Drawing on direct experience as a former negotiator of the <u>EU Forced Labour Regulation</u>, the speaker laid out the regulation's intent, structure, and transformative potential.

The regulation is grounded in a simple principle: human rights are not negotiable, and goods made using forced labor must not enter or leave the European market. Positioned as more than a symbolic gesture, the law is designed to remove the economic incentives that allow exploitation to thrive in global supply chains. It reflects a growing consensus that corporate accountability is now the bare minimum. A standout feature of the regulation will be the development of a publicly accessible risk-based database. This tool will identify high-risk sectors, geographies, and supply chain actors, empowering both regulators and consumers. The mechanism divides enforcement responsibilities: EU member states will oversee domestic investigations, while the European Commission will lead inquiries into products sourced externally. This joint responsibility structure was described as a critical safeguard for harmonized application across the region.



The speaker also highlighted that vulnerable groups, particularly women, children, and marginalized communities, face the greatest risk of forced labor and the greatest barriers to remediation. The forced labor regulation explicitly includes gender and agesensitive provisions. Additionally, future evaluations of the mechanism will revisit the inclusion of a formal remedy mechanism.

The address also emphasized the importance of global cooperation. The EU measure aligns with parallel laws in the United States and other jurisdictions, and efforts are underway to strengthen international data sharing, identification of risk indicators, and synchronization of enforcement practices. Collaboration, not isolation, is essential for addressing the global nature of forced labor. While the regulation was celebrated as a landmark achievement, the keynote cautioned participants that current political headwinds, including deregulatory pressures and rising opposition to rights-based frameworks, could jeopardize progress. Attendees were encouraged to remain vigilant, defend existing gains, and push for swift, meaningful implementation.



### **KEY TAKEAWAYS**

### The Importance of the EU Forced Labor Regulation

The EU Forced Laborr Regulation reflects a non-negotiable stance on human rights and bans goods made with forced labor from entering or leaving EU markets. It introduces a risk-based, public database to guide enforcement and transparency, and divides investigative roles between the European Commission and Member States. The law includes provisions to address the needs of vulnerable populations and lays the foundation for future remediation mechanisms.

### Political Regression Threatens the Future of Human Rights Legislation in Europe

Political shifts and rising opposition to rights-based frameworks may threaten implementation. The audience was urged to defend progress, remain vigilant, and ensure that legal commitments are followed by concrete actions capable of producing lasting change.

# Corporate Responsibility Laws Ensure Fair Competition and Protect Ethical Businesses

By holding all companies accountable for respecting human rights, laws like the EU Forced Labor Regulation create a level playing field. They remove the unfair advantage of those who exploit workers and reward businesses that uphold ethical standards.

# SCENE SETTING: UNDERSTANDING THE CURRENT LANDSCAPE ON FORCED LABOR, CHILD LABOR AND THE PATHFINDER FRAMEWORK

The first panel discussion of the 2025 Europe Regional Freedom from Slavery Forum explored emerging strategies and persistent challenges in addressing forced labor and child labor within Europe and across global supply chains. Drawing on insights from stakeholders across the public, private, and labor sectors, the discussion emphasized the need for coordinated, multi-level responses rooted in regulatory frameworks and on-the-ground realities.

A central theme was the role of international partnerships and global frameworks, such as the Alliance 8.7, which aims to eliminate forced labor, child labor, and human trafficking as part of the United Nations Sustainable Development Goals (UN SDGs). The Alliance 8.7 includes three Pathfinder Countries from the European Union, which are France, The Netherlands and Germany, and over 400 actors including civil society organizations, governments, survivors' representatives, and businesses. The Regional Initiative Latin America and the Caribbean Free of Child Labor was also highlighted as a successful example of international collaboration to drive advancement in the shared agenda of eradicating child labor.



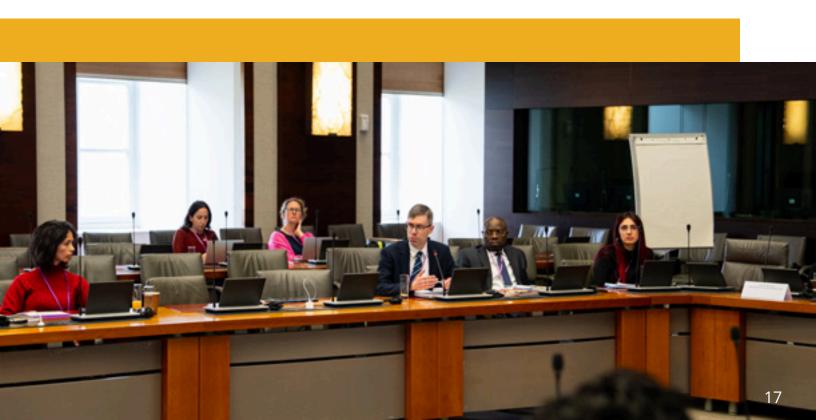


Panelists highlighted how recent data from international labor agencies indicate a troubling resurgence in exploitative practices: as of 2021, over 28 million people were in situations of forced labor, generating illegal profits exceeding \$236 billion annually. These figures suggest that prior gains are being eroded by conflict, economic strain, and demographic pressures.

The discussion underscored the value of national acceleration strategies developed in response to these global trends. Such strategies aim to strengthen prevention, improve victim protection, and promote responsible corporate behavior across global supply chains. Approaches include the integration of interministerial action plans, targeted training for professionals such as labor inspectors and judges, and engagement with vulnerable populations including migrants, women, and children. Panelists noted the importance of regular monitoring and stakeholder inclusion in assessing the effectiveness of these strategies.

From a regulatory perspective, attention was given to the EU's Forced Labor Regulation, which takes effect in 2027. Designed as a product-based, risk-oriented instrument, the regulation will guide investigations based on the sector, geographic areas, scale, severity, and volume of goods suspected of being linked to forced labor. Panelists discussed the complexities of implementing this regulation uniformly across member states, particularly the challenges of designating competent national authorities and creating centralized databases. The regulation is also expected to include guidelines for businesses and emphasize support for small and medium-sized enterprises (SMEs). As suggested, the database and guidelines will be presented in 2026.

In terms of business engagement with regulation and legislation, it was noted that agricultural supply chains, particularly in the case of smallholder farming, pose unique challenges due to their fragmented structure and limited traceability. Businesses operating in these sectors face logistical and informational barriers to identifying labor risks, especially in regions with limited infrastructure or record-keeping. However, participants highlighted that increased regulatory pressure has encouraged many companies to invest in traceability, data collection, and risk assessment tools. Multiple contributors attested to the need for innovation and collaboration, noting that addressing forced labor in global supply chains requires both systemic change and local engagement for implementation. Panelists indicated that practical mechanisms for remediation, particularly in rural or informal labor contexts are currently underdeveloped. They also emphasized the need for worker access and the inclusion of civil society organizations in implementation efforts, especially in the process of identifying and responding to violations.





Despite the scale of the challenges, including funding cuts and political instability, panelists pointed to the potential of recent legislative initiatives to catalyze change. The EU Forced Labor Regulation, while primarily product-focused, was seen as a potentially transformative mechanism—especially if it leads to high-profile enforcement cases.

Businesses are increasingly aware of the reputational and financial risks tied to non-compliance, making them more receptive to due diligence practices. Participants stressed that transparency, accountability, and collective will are critical if progress is to be accelerated. Shared learning spaces, joint campaigns, and strategic partnerships among businesses, unions, academic institutions, and civil society organizations were highlighted as essential to sustaining momentum.

The discussion concluded with calls to ensure proper remediation, center people over profit, protect workers regardless of status, and ensure that emerging policies do not exist in isolation but are grounded in inclusive, enforceable, and worker-informed practices. While the road ahead is complex, with coordinated action, meaningful progress remains within reach.

### **KEY TAKEAWAYS**

### **Alliance 8.7 Drives Collective Global Action**

The ILO is the secretariat of the Alliance 8.7, meaning it facilitates the Alliance, Ambassador Claudia Fuentes Julio (Chile) is the chair. Alliance 8.7 coordinates governments, civil society, and business to eliminate forced labor, child labor, and human trafficking. Countries like France lead by aligning national efforts with global goals.

### **National Acceleration Strategies Show Promise**

Countries are developing multi-ministerial action plans to prevent exploitation, protect victims, and regulate supply chains.

### The EUFLR is a Product-Based Enforcement Tool

The regulation bans goods linked to forced labor and uses a risk-based approach to prioritize enforcement. A public database and detailed guidelines will support implementation, with full rollout of these tools expected by summer 2026, with enforcement beginning in 2027.

### Traceability in Agriculture Remains a Major Barrier

Businesses struggle to track sourcing from smallholder farms, especially in West Africa. Without traceability, it's difficult to assess or remediate labor risks, highlighting the need for innovation and cooperation.

### **Migrant Workers Across Europe Face Growing Exploitation**

Short-term contracts, informal labor, and anti-migrant politics expose migrant workers to abuse and silence.

### **Need for Practical Remediation Tools**

There is an urgent need to develop accessible mechanisms for remediation in context lacking formal structures.



# PANEL DISCUSSION: ENGAGING SURVIVORS IN ADDRESSING FORCED LABOR AND CHILD LABOR

The second panel tackled one of the most critical, yet persistently under-addressed, dimensions of anti-modern slavery work: the meaningful engagement and leadership of survivors in strategies to end exploitation. Panelists highlighted how survivors of labor trafficking bring critical insight into both root causes and practical barriers to change. One speaker shared the story behind the founding of a rights-based organization where many team members are survivors themselves, emphasizing that the organization was built in response to the exclusion of those with lived experience from high-level discourse and program design. Using this organization as an example of good practices, the discussion highlighted that centering survivors of anti-modern slavery efforts is essential, for both ethical and pragmatic reasons as their exclusion weakens the impact of policies and programs. The need to expose hidden injustices, codevelop solutions with affected communities, and pursue systemic change through grounded, inclusive approaches was emphasized. Exploitation was framed as a power imbalance, reinforcing the importance of "democracy at work" and survivor input in stress-testing interventions. Examples included organizing vulnerable workers in politically restricted regions through culturally appropriate strategies. The approach integrates real-time data, grassroots engagement, and structural advocacy. A call was made for sustained investment in survivor capacity and leadership.







"We must think beyond the limitations imposed on us. Sometimes we don't even have the language to describe the suffering."

- Dr. Hyab Yohannes, University of Glasgow

Another panelist expanded this theme through the lens of sexual exploitation, describing the work of a survivor-led organization that embodies peer support as a foundational principle. The organization trains survivors not only to rebuild their own lives but to become professionals, legal advisors, public speakers, workshop facilitators, and advocates. A personal journey from victim to legal professional was shared, underscoring how survivor leadership can challenge stigma and redefine narratives of capability and strength.

While policy and practice often focus on survivors, the panel also called attention to those who remain victims. Another intervention urged participants to reckon with the sheer scale of death among displaced populations; citing data from the Mediterranean and beyond challenging the room to consider the ethical vacuum that allows so many to be lost without trace. These reflections blurred the line between victim and survivor, suggesting that in today's world, many are engaged in a shared struggle to survive systems of exclusion, displacement, and erasure.



99

"Becoming a survivor leader isn't just about motivation or courage. It takes structure, support, and time."

- Maud Pommier, MIST

Questions emerged regarding the very language of the anti-modern slavery sector. Terms like "elimination" and "freedom" were interrogated: are they still meaningful when progress remains so elusive? Meaning that we need to reframe the approach to be holistic and center the efforts on the root causes of the problems, and also, on the limitations of language. Then, a poem was shared calling for ways of understanding or expressing the problem beyond words, and more human-centered dialogues. Two additional threads ran through the discussion. The first concerned capacity-building. Survivor leadership requires training, funding, time, and care. It demands recognition of survivors not just as individuals with painful pasts, but as emerging professionals. This includes psychological support, skills development, and spaces for collaborative learning. The message was clear: empowerment without infrastructure is performative.

The second thread was collaboration, particularly between NGOs and survivor-led organizations. Several speakers acknowledged a persistent tension in the sector between traditional organizations and emerging survivor collectives often competing for the same limited funding. Panelists argued that this competition must give way to coalition-building, in which shared goals are prioritized over territorial claims; noting that the most effective social movements in history succeeded not through perfect alignment but through strategic cooperation across diverse actors.

Audience questions added depth to the discussion. Participants raised concerns about how to overcome visa barriers for survivor participation in international events, how to convince businesses to meaningfully engage survivors in due diligence processes, and how to make the case for funding creative and therapeutic modalities that resist easy quantification of their outcomes and impact. Panelists offered practical suggestions: shifting forums to accessible locations, leveraging digital participation, framing survivor insights as business risk mitigation tools, and emphasizing the relational power of arts-based interventions in connecting with public audiences.



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"We are all survivors bearing witness to tragedies and indifference inflicted on the entire globe."

– Dr. Hyab Yohannes, University of Glasgow

### **KEY TAKEAWAYS**

### **Lived Experience Experts Should Lead the Movement**

Survivors should not simply be added to existing agendas: they must shape them. Genuine engagement demands humility, active listening, and readiness from civil society, policymakers, researchers, and other stakeholders to share power and make space for survivor leadership.

### Peer Support is Key When Working With Survivors of Human Trafficking

Peer support creates safe, empathetic spaces where survivors can share experiences, rebuild trust, and begin healing together. Beyond emotional support, it restores a sense of dignity, agency, and belonging.

### **Survivor Leadership Requires Investment, Not Symbolism**

True survivor leadership goes beyond inclusion; it demands sustained investment in training, psychological support, and professional growth. Survivors must be recognized not only for their lived experience but as emerging leaders and experts. Without adequate infrastructure, efforts toward empowerment risk being tokenistic and ineffective.

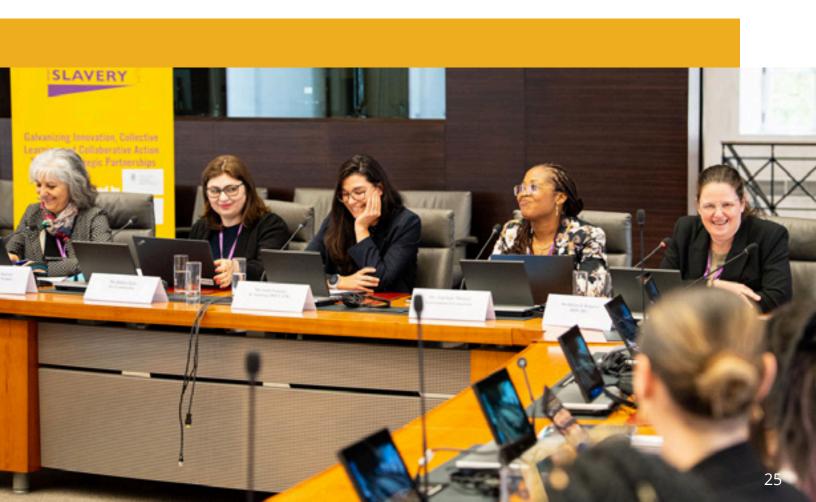
### Joint Advocacy Between NGOs and Survivor-led Groups is Essential

While panelists and participants recognized ongoing tensions around funding and representation, they emphasized that collaboration remains a key solution. Survivor leadership and NGO expertise should be viewed as complementary strengths, not competing forces.

# PANEL DISCUSSION: FORCED LABOR BAN REGULATIONS - CHALLENGES AND THE WAY FORWARD

The third panel of the Forum addressed the current landscape of forced labor ban regulations, examining their limitations and opportunities for future progress. The discussion focused on how these bans function as tools to combat forced labor within global trade systems.

The session began with a clear explanation of what forced labor bans entail: regulatory trade measures designed to block goods made using forced labor, whether privately or state-imposed, from entering or circulating within a given market. A key distinction was drawn between these bans and mandatory human rights due diligence (MHRDD) laws. While MHRDD laws focus on processes, requiring companies to assess, prevent, and mitigate risks of human rights abuses across their supply chains, forced labor bans are oriented toward enforcement and outcomes. They target products themselves, removing them from the market or preventing them from entering it if they are found to be tainted by forced labor, regardless of the due diligence efforts made by companies.





The European Union's recent forced labor regulation is not limited to imports but also applies to goods produced within the EU. This makes it a market ban, rather than strictly an import ban, placing obligations on all products circulating in the EU market. The regulation does not impose due diligence requirements but complements existing instruments, such as the <u>Corporate Sustainability Due Diligence Directive (CSDDD)</u>. Together, these frameworks establish a more robust system to promote ethical business practices and eliminate forced labor within supply chains.

Another speaker provided a comparative overview of global legislation, noting that measures like the EU regulation and the <u>U.S. Uyghur Forced Labor Prevention Act</u> have significant implications for international trade. While these laws send a strong message about the unacceptability of forced labor, their effectiveness depends on robust enforcement, company compliance, and cross-border cooperation. A challenge raised was the difficulty of tracing forced labor within complex, multi-tiered supply chains. In many cases, forced labor exists far from the final stages of production, complicating detection and accountability.

There was also discussion on how these bans are shaping corporate behavior. Emphasis was placed on the importance of supply chain traceability and mapping. Companies must understand where their products originate to identify risks effectively. While some businesses cite commercial sensitivity as a barrier to transparency, it was argued that meaningful disclosure is both possible and necessary. Transparency about the efforts undertaken and the challenges is needed to build credibility.

Grievance mechanisms were highlighted as essential for impact. For affected workers to come forward, they must feel safe and confident in the systems set up to protect them. Anonymity, protection from retaliation, and trust in the process were identified as key factors. It was noted that the existence of a grievance mechanism with no complaints should not be seen as a positive sign, but rather a potential red flag for ineffectiveness or fear among workers.

Another major theme was remediation. Participants emphasized that addressing forced labor cannot stop at simply identifying violations, it must include concrete remedies for victims. This includes reimbursing recruitment fees, compensating unpaid wages, and ensuring safe conditions. Though not yet embedded in the EU forced labor regulation, there remains advocacy to integrate remediation more explicitly into future regulatory frameworks.





Attention then turned to state-imposed forced labor. A detailed case study illustrated how tens of thousands of public sector employees are, during harvest season, forced into cotton harvesting by state authorities in Turkmenistan. Despite international scrutiny and previous U.S. trade restrictions, substantial volumes of cotton from this country continue to reach global markets directly and indirectly especially through third-party manufacturing hubs. This shows the need for harmonized international standards, to avoid goods made with forced labor risk being diverted to less regulated markets.

Additionally, the case of Cameroon was presented as a positive example of national commitment to addressing forced labor through comprehensive legal and institutional frameworks. The country has ratified key international conventions, integrated forced labor prohibitions into its penal code, and established inter-ministerial coordination mechanisms. Notable progress includes the development of a national roadmap, awareness-raising initiatives in rural communities, and ongoing capacity-building efforts. While challenges such as limited national data remain, the government continues to work toward strengthening its response with openness to international collaboration and shared learning.

The session concluded with a call for stronger global alignment, cooperation in enforcement, and support for corporate accountability. Regulatory frameworks must be reinforced by coordinated efforts across jurisdictions, clear guidance for companies, and a shared commitment to upholding the rights of workers within supply chains.

### **KEY TAKEAWAYS**

### Forced Labor Bans and MHRDD Laws Serve Different Purposes

While mandatory human rights due diligence (MHRDD) laws focus on process and risk prevention, forced labor bans are enforcement-driven, meaning they target and remove non-compliant products from the market.

# The EU Forced Labor Regulation Applies to Both Imports and Domestic Production

This expands accountability beyond international supply chains, recognizing that forced labor must be addressed within the European Union.

### Global Regulations are Important, but Enforcement is Critical

Measures such as the EU regulation and the U.S. Uyghur Forced Labor Prevention Act send a strong message, but their effectiveness relies on strong enforcement, company compliance, and international cooperation.

### **Traceability is Essential for Corporate Accountability**

Companies must map and monitor their supply chains to detect and address forced labor risks. Transparent reporting on efforts and challenges is vital for building trust and credibility.

### **Grievance Mechanisms Must be Accessible and Trusted**

Systems must protect anonymity, prevent retaliation, and be responsive to worker concerns. A lack of complaints should be treated as a red flag, not a sign of success.

### Remediation Should be Explicitly Required Under the EUFLR

Addressing forced labor must go beyond identifying and removing products, it should include concrete remedies for victims.



# WORKSHOP: BEST PRACTICES FOR RESEARCH ON MODERN SLAVERY AND HUMAN TRAFFICKING

The first workshop of the 2025 Forum explored best practices for research on modern slavery and human trafficking, with a focus on ethics, methodology, and inclusive data collection. Panelists encouraged a deeper, human-centered understanding of slavery, moving beyond legal definitions to reflect the living realities of exploitation, such as loss of control, dignity, and legal status. Participants highlighted the complexity of measurement, including how to responsibly estimate prevalence, interpret data, and acknowledge the limits of current methods. A concrete example came from an ambitious project mapping bonded labor across fifteen states of India using satellite data and AI to target high-risk areas for in-person surveys. The potential of technology is promising, but presenters warned against over-reliance on data without context or ethical safeguards. Participants emphasized the importance of reliable data to guide decision-making—not only to determine what actions can be taken, but also to identify where interventions are most needed. This remains a gap in some countries.



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"We need a library of knowledge built through equal participation: not just survivors, not just policymakers – but everyone together as equals (...) together in one place, empirical, emotional, and political to truly understand what slavery is and what it does to people."

– Dr. Hyab Yohannes, University of Glasgow

The need for trauma-informed approaches, not only in working with survivors but also for the researchers themselves, was another key topic of the workshop. Several groups called for clearer standards and preparation for academics, journalists, and others engaging with affected populations. This was highlighted as a key issue, particularly in the context of upcoming regulations that will require companies to increase efforts to demonstrate the absence of forced labor in their supply chains. A major challenge will be training all those involved to ensure that there is no harm to the affected populations.

Survivor inclusion was seen as critical, not only in participation, but in leadership, design, and ownership of research. Key reflections included the need for trust, adequate time, and cultural sensitivity. Concerns were raised about the mismatch between official data and frontline realities and the fragmentation of tools and standards across institutions.

The workshop closed with a call for ethical vigilance, interdisciplinary collaboration, survivor-centered knowledge systems, and a shift from critique toward questioning the broader systems that enable modern slavery.



### **KEY TAKEAWAYS**

### **Research Must be Critical and Contextual**

The workshop urged researchers to move beyond description and engage critically with the structural forces that sustain modern slavery. Approaches rooted in critical realism and decolonial analysis were emphasized as vital for unpacking root causes and challenging power imbalances.

# Data is Essential, but Interpretation Matters – Especially Regarding New Technologies

Quantifying modern slavery is complex. Speakers highlighted both the potential and limitations of big data, satellite imagery, and AI in estimating prevalence. Prevalence models must be used with transparency and caution.

### **Knowledge Must be Co-Created**

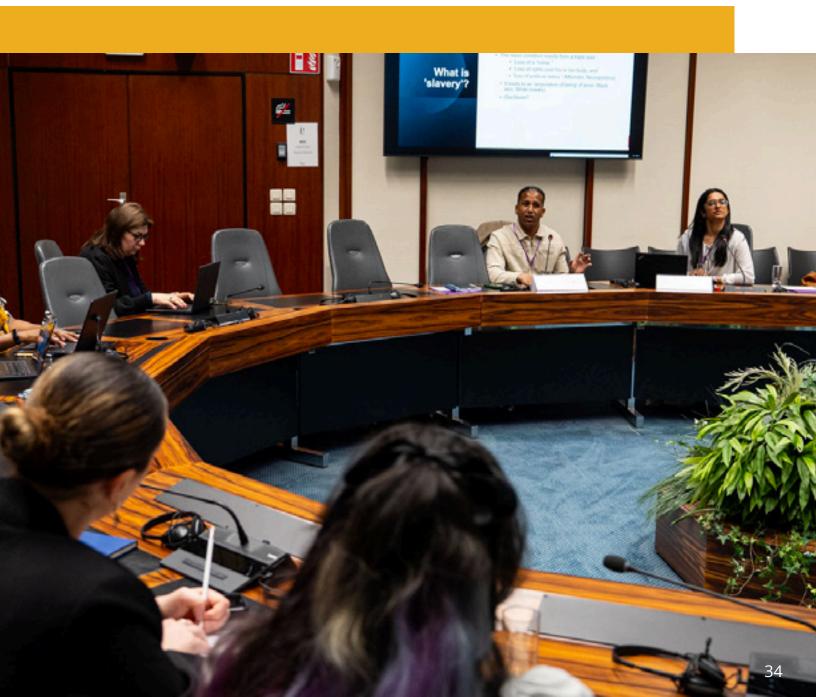
Survivors should not just participate in research but also help lead it. The workshop called for inclusive research design, survivor-led methodologies, and equitable co-ownership of knowledge creation processes.

### **Bridging Research and Practice Remains a Core Challenge**

Participants highlighted a persistent gap between academic and field-based knowledge. Research must directly inform policy and enforcement, yet many frontline actors lack access to actionable data or face contradictions between evidence and lived experience.

### **Preparation to Work with Traumatized Populations is Essential**

Researchers and journalists alike must be trained in trauma, the proper terminology, and cultural sensitivity to avoid retraumatization or misrepresentation of survivors.



# WORKSHOP: EXPLORING CROSS-NATIONAL AND CROSS-REGIONAL SYNERGIES ON IMPORT BANS AND OTHER MEASURES ON FORCED LABOR

This workshop examined the role of forced labor import bans, using real-world case studies to reflect on the impact, gaps, and future potential. Participants discussed the <u>Top Glove case in Malaysia</u>, in which a U.S. import ban led to financial remediation for workers, setting a great precedent; but also revealed inconsistencies when other countries continued sourcing from the same supplier. Discussions around the Top Glove case and import bans highlighted fragmented enforcement and the risk of creating "dumping grounds" in jurisdictions without similar measures. Suggestions included mutual recognition between countries, sharing enforcement data, and building capacity in lower-income economies to avoid unintended consequences. Several groups explored the balance of costs between governments, businesses, and consumers, and the need for both incentives and penalties to drive change.

Some participants emphasized the need to improve traceability tools to make these laws meaningful, such as certification schemes or DNA testing, and the use of satellite or Al-based monitoring. Others highlighted the importance of protecting leverage with suppliers by coupling bans with worker-centered engagement, rather than abrupt cutoffs that may push abuse further out of sight.

The session closed with a call to re-center future remediation efforts engaging participation on the type of remediation that is needed for workers, survivors, and those most affected by forced labor working conditions.



## **KEY TAKEAWAYS**

# Import Bans Can Only Drive Corporate Reform if Enforced Through Coordinated Global Efforts

Without aligned frameworks across jurisdictions, there's a risk of creating "dumping grounds" that weaken the overall impact of legislation and regulations. Harmonizing regulations across similar markets is therefore essential.

#### **Current Models Shift Costs Down the Chain**

Participants warned that traceability and compliance efforts too often externalize costs to suppliers or workers. Ethical regulation must address who pays and ensure mechanisms don't penalize those with less resources.

#### **Technology has Potential**

Tools like satellite imagery and AI can enhance traceability. But without contextual understanding, they risk abstraction and harm. Data must be publicly accessible, interoperable, and grounded in lived realities.

#### **Workers and Survivors Must be Central to Solutions**

Despite technical progress, few policy models meaningfully include worker voice, and there is a need to move beyond top-down compliance and embrace worker-centric and survivor-informed approaches to remediation and reform.

# **REGIONAL CHALLENGES IDENTIFIED ON DAY ONE**

#### **Political Regression and Backlash**

Populist political movements are threatening to roll back or weaken human rights and labor protections in Europe.

#### **Lack of Harmonized Global Standards**

Without harmonized global standards, goods banned in one region may be rerouted to less regulated markets, creating "dumping grounds."

#### **Fragmented Global Response**

Lack of international coordination results in regulatory gaps, duplication, and inefficiencies in tackling forced labor across borders.

#### **Sustainable Funding Remains Scarce**

Many frontline organizations, including survivor-led and local CSOs, face unpredictable or short-term funding cycles. This undermines long-term planning, program continuity, and coalition-building efforts.

#### **Traceability Gaps in Supply Chains**

Particularly in agriculture and among smallholder suppliers, traceability is costly, difficult, and inconsistent.

#### **Survivors are Often "Included" Performatively**

Rather than empowered as leaders or co-creators of solutions.

#### **Access to Reliable, Contextualized Data**

Policymakers, businesses, and enforcers struggle to make evidence-based decisions due to missing or misaligned data.



# PROPOSED SOLUTIONS TO THE IDENTIFIED CHALLENGES

# **01.** Binding Legislation with Inclusive Enforcement

Implement laws like the EU Forced Labor Regulation and Corporate Sustainability Due Diligence Directive (CSDDD) with clear mechanisms for remediation, transparency, and enforcement. Additionally, the movement should promote these types of legislation worldwide.

# **02.** Incentivize Ethical Corporate Behavior with Policy

Combine the "carrot" (subsidies, support, public recognition) with the "stick" (legal consequences) to shift business norms.

#### **03** Keep Human Rights Central to Economic Models

Challenge exploitative business incentives and embed human dignity at the core of supply chains, legislation, and trade practices.

# **04.** Global Coordination and Mutual Recognition

Develop international standards and shared databases for enforcement. Adopt mutual recognition of bans and risk assessments to avoid duplication and loopholes.

#### **05** Reinforce Multi-Stakeholder Collaboration

Facilitate coordinated partnerships across government, civil society, survivor networks, the private sector, and academia to align agendas and scale solutions.

# **06.** Empower Survivor Leadership

Move beyond consultation to empower survivors in designing, leading, and evaluating anti-modern slavery strategies and policies.

# **07.** Ethical, Survivor-Informed Research

Build a "knowledge commons" grounded in critical realism and cocreation with survivors and affected communities. Train researchers in trauma-informed, ethical methods.

# **18.** Informed Use of New Technologies for Data-Driven Action

Use AI, satellite imagery, and prevalence models to enhance visibility, but ensure they're context-sensitive, transparent, and publicly accessible.



# **RECEPTION HONORING ANOUSHEH KARVAR**

At the close of the first day, a reception was held to honor Anousheh Karvar for her outstanding leadership in the movement to end modern slavery, particularly as Chair of Alliance 8.7. Under her leadership from 2019 to 2023, the Alliance significantly advanced global efforts to eliminate child labour, forced labour, human trafficking, and modern slavery. Bukeni Waruzi, Executive Director of Free the Slaves, presented her with a Certificate of Recognition in acknowledgment of her remarkable contributions. The evening concluded with thoughtful remarks from Marcia Eugenio, former Director of the Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) at the U.S. Department of Labor's Bureau of International Labor Affairs (ILAB) and current Board Member of Free the Slaves, celebrating Karvar's impact and setting a hopeful tone for the days ahead.



# Day Two

# **OVERVIEW OF SPEAKERS**

- Bagula, Donat Government of the Democratic Republic of the Congo
- Rafaela, Samira Cornell University / Former MEP
- Andjelkovic, Marija ASTRA Anti-Trafficking Action
- Auger, Faustine International Cocoa Initiative
- Bianchetti, Maria Pia Independent Expert
- Bonertz, Fabian OSCE
- de Franchis, Laura The Alternatives Factory
- de Wael, Eveline Fair Wear
- Dekkiche, Sarah International Cocoa Initiative
- Hyab, Yohannes University of Glasgow
- Hoff, Suzanne La Strada International
- Kahle, Alena Fair Trade Advocacy Office
- Morgan, Jeff SUCDEN Trading
- Pommier, Maud MIST
- Qadri, Mustafa Equidem
- Treibich, Muriel Clean Clothes Campaign
- Vanpeperstraete, Ben Anti-Slavery International
- Wallis, Andrew Unseen



# **OPENING REMARKS**

Day Two of the 2025 Europe Regional Forum opened with reflections from a leader with over two decades of experience combating human trafficking and exploitation. Their reflection noted that while laws and awareness have evolved, the systems meant to protect victims are not keeping pace with the scale or complexity of today's forced labor challenges. In the context of Serbia, what began years ago as isolated cases of sexual exploitation has now shifted toward widespread labor exploitation affecting entire groups of workers. The speaker described how frontline efforts have gone from supporting one or two survivors to navigating cases involving dozens or even hundreds of individuals, often brought in under legal but highly exploitative labor migration schemes. In many instances, these workers are left without access to shelter, medical care, documentation, or legal support. Crucially, deportations often occur before victims can access justice, as states move quickly to silence cases rather than resolve them. Without strong due diligence laws or functioning remedies, local systems are often overwhelmed or indifferent.

The speaker emphasized that in such situations, when countries are not willing, international attention becomes the only viable pathway. By identifying cross-border elements, civil society can activate global mechanisms, such as EU institutions, UN rapporteurs, or international human rights rulings. But even when successful, this attention doesn't always lead to tangible remedies, highlighting a deep gap between recognition and redress. They also called for better alignment across legal and policy frameworks that address forced labor, trafficking, and child labor, urging stakeholders to treat these abuses not as separate silos but as interconnected elements of a broader system of exploitation. Equally important, no country or affected group should be left behind due to a lack of capacity or political prioritization.



# **KEY TAKEAWAYS**

#### Labor Exploitation is Scaling Up and Evolving in Serbia

Cases now involve hundreds of workers in complex supply chains, making support and remediation far more demanding than a decade ago.

#### Due Diligence Frameworks are Urgently Needed in Under-Regulated Contexts

Countries without human rights due diligence laws or proper enforcement struggle to offer meaningful support or justice to exploited workers.



# **KEYNOTE: HARNESSING THE PROMISE OF SDG 2030**

The keynote began with a sobering assessment of global progress toward SDG Target 8.7, which aims to eliminate child labor by 2025 and forced labor, human trafficking and modern slavery by 2030. That goal remains unmet. Conflict, displacement, digital exploitation, and increasingly complex supply chains are all intensifying child vulnerability. Child trafficking is not declining; it is adapting. New and emerging forms of exploitation are becoming more common. Victims are younger. Children are being trafficked not only for labor and sexual exploitation but also for involvement in criminal activities. In this context, the number of victims forced to work in online scam centers is rising—not only in South Asia, but also in other parts of the world, including Europe, particularly in the Balkans.

Rapid technological developments have given traffickers new tools and platforms, such as social media and Generative Artificial Intelligence, to attract and mislead new victims, yet legislation and enforcement mechanisms regarding technology advancements are slow to keep pace. Therefore, tech companies should also take actions to prevent and control this crime from occurring, and governments must hold tech companies accountable and require them to report trafficking cases on their platform.

Legal protection alone is not enough, as implementation is often fragmented and under-resourced. What is needed is a holistic, child-centered approach that integrates prevention, protection, and prosecution. Systems must be designed to promote trust, ensure participation, and avoid retraumatization. Supply chain regulation is also a key aspect of protecting children and adult workers. The current focus on direct suppliers is inadequate as exploitation often occurs deeper in supply chains in agriculture, mining, fisheries, and other high-risk sectors. If companies are left to define which stakeholders are relevant, important voices will be excluded. To be effective, regulation must reach further than first-tier suppliers and create a broader base of inclusion in these essential processes.

As stated by the keynote speaker, behind every statistic is a child whose life and freedom are at risk. Achieving Sustainable Development Goal (SDG) 8.7 is not merely a technical milestone but a moral imperative. To meet this challenge, we need stronger legislation, faster responses to emerging risks, and deeper collaboration among governments, civil society, and the private sector. Our goal is clear: no child should be left behind.

## **KEY TAKEAWAYS**

#### **Rising Child Vulnerability**

Conflict, displacement, complex supply chains, and digital exploitation are increasing children's exposure to trafficking and labor abuses.

#### **Tech's Role in Trafficking**

Social media and Generative AI are being weaponized by traffickers. Regulation and enforcement are lagging behind technological advancements. Tech companies must be held accountable.

#### **Supply Chain Regulation is Critical to Protecting Children and Adult Workers**

Effective regulation must extend beyond first-tier suppliers and ensure broader, more inclusive stakeholder engagement.



# PANEL DISCUSSION: TEXTILE INDUSTRY, FAST FASHION AND THE EUROPEAN LEGISLATION - THE COMPLICATED FIGHT AGAINST CHILD LABOR IN THE TEXTILE INDUSTRY

The first panel of the forum's second day focused on the persistent issue of child labor in global supply chains, exploring root causes, regulatory mechanisms, and practical approaches for systemic change. The session brought together insights from policy, civil society, and business perspectives, emphasizing the importance of coordinated, worker-centered strategies.

One of the foundational points raised was the economic logic behind child labor, its link to the business model of the fast fashion industry, and systemic poverty. Low wages in many supply chains contribute to household income gaps, pushing children into work and keeping them out of school. This perpetuates a cycle of vulnerability and lost potential. Addressing root causes, such as poverty and lack of access to education, was emphasized as essential not just from a human rights perspective, but also as a pathway to long-term economic growth in producing countries. Ensuring fair wages for adult workers can reduce the need for child labor, increase school attendance, and ultimately open new markets by strengthening local economies.





The role of fair wages as both a preventive measure and a development tool is key. However, increasing wages in lower-income countries could reduce child labor but may also raise concerns about delocalization if companies relocate to regions with weaker standards. Panelists emphasized the importance of balancing improved labor conditions with sustainable business models that don't penalize countries for improving worker protections.

Fair Wear presented its "Steps Approach" to due diligence as a practical framework companies can use to assess and address labor rights risks in their supply chains, including child labor. The approach guides companies through structured steps toward continuous improvement, with worker engagement and transparency at its core. The panel stressed that change cannot come from a compliance-only mindset; companies must engage responsibly with suppliers and consider the voices and rights of workers at every stage. Responsible purchasing practices and long-term buyer-supplier relationships were highlighted as critical enablers of change.

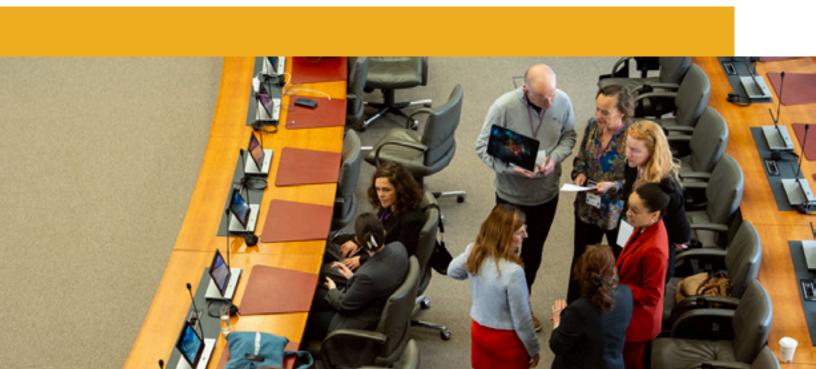
Supply chain traceability was identified as a significant challenge in tackling child labor. The complexity of multi-tiered global supply chains, particularly in sectors like textiles and agriculture, can obscure where and how child labor occurs. The panel discussed strategies for improving traceability, such as supply chain mapping, field-level monitoring, and collaboration with local actors.

The discussion turned to the potential and limitations of public enforcement. While regulatory pressure is growing, panelists cautioned against assuming that legal mechanisms alone will lead to impact. Strong enforcement frameworks are needed, but they must be paired with implementation support, resources, and mechanisms that protect affected communities from unintended consequences. Transparency was emphasized as a tool for credibility, provided companies are not punished for disclosing challenges.

Among regulations, the session addressed the EU Forced Labor Regulation (EUFLR) and the Corporate Sustainability Due Diligence Directive (CSDDD). Both are seen as significant developments to improve global supply chains, especially as they create a level playing field and fair competition among businesses. However, questions remain around how enforcement will be carried out and the support that companies will need to comply effectively.

Worker-centered approaches were consistently highlighted as crucial. One model that was discussed was the <u>International Accord</u> (formerly the Bangladesh Accord), which demonstrates how enforceable agreements developed in collaboration with unions and other stakeholders can improve conditions across supply chains. The value of multistakeholder initiatives was also emphasized as a way to sustain progress and accountability.

The session concluded with a call for aligning legal frameworks, business practices, and development strategies to address child labor in a meaningful way. A focus on root causes, fair wages, traceability, transparency, responsible sourcing, strong enforcement, and inclusive dialogue were presented as the path forward.



## **KEY TAKEAWAYS**

#### Child Labor is Embedded in the Global Garment Industry's Structure

Panelists emphasized how child labor persists at all stages of the supply chain, from cotton harvesting and spinning to final assembly. Poverty wages, informal employment, gender-based exploitation, and weak legal enforcement make child labor a systemic problem.

#### Low Wages for Adults Directly Push Children into Work

Many garment workers earn wages far below living standards. In Bangladesh, for example, the legal minimum wage is \$100/month. A living wage would equate to \$450/month. Inadequate adult wages force families to rely on children for supplemental income.

#### **Transparency and Traceability are Essential**

There is an urgent need for companies to fully map and publicly disclose their supply chains. Without knowledge of suppliers beyond tier 1, due diligence is impossible.

#### **Worker-Centered Approaches are Essential**

Auditing alone is not enough. Social audits often fail to detect forced labor and can be misleading. Workers are rarely consulted, and audits are sometimes stage-managed. Worker-centered approaches offer more reliable insights.

#### The Role of Fast Fashion Business Models

Panelists critiqued fast fashion's profit-driven model, emphasizing how tight production deadlines and cost-cutting pressures incentivize suppliers to exploit labor. Competition to offer the lowest prices has driven brands to continually shift sourcing to cheaper markets, exacerbating the problem.

#### **Binding Legislation and Enforcement are Key**

The CSDDD and the EU Forced Labor Regulation were praised, but speakers warned that effectiveness depends on scope and enforcement.



# PANEL DISCUSSION: STRATEGIES FOR SUSTAINING THE CURRENT FUNDING LANDSCAPE TO ADDRESS FORCED LABOR, CHILD LABOR, AND TRAFFICKING IN PERSONS

The second panel discussion of day two explored the increasingly urgent challenge of sustaining and strengthening funding for the global fight against forced labor, child labor, and trafficking in persons. Bringing together voices from multilateral agencies, national governments, research institutions, and civil society organizations, the session examined current funding dynamics, persistent gaps, and strategic approaches to ensure that resources remain stable, equitable, and impactful in the long term. The discussion was rooted in the current context in which there have been major funding cuts for human rights initiatives after the recent closure of USAID, and also from major governmental donors in Europe as a result of political shifts.

Funding in this sector remains fragmented, short-term, and vulnerable to political cycles. Panelists noted that support is often tied to rigid donor priorities or short-lived project frameworks, making it difficult to sustain systemic interventions. Panelists cautioned funders to be aware of their "soft power" and ability to shape agendas, partnerships, and narratives.





Criticism was also directed at current global spending priorities. Participants noted that since 2015 in the EU, over €30 billion has been spent on border security, often through external agreements with partner countries. In contrast, funding for human rights, decent work, and protection mechanisms remains limited. There were strong calls to redirect more investment into people, especially displaced populations, through education, healthcare, employment, and resettlement.

A recurring theme was the need for more transparency and open conversation about how resources are allocated and used. Participants stressed the importance of a joint representation mechanism or industry body to advocate on behalf of the field. Such a body could help attract investment, coordinate action, and build credibility. Alongside this, there was a call to collect and share clear impact stories to demonstrate what is being achieved and why the work matters.

One of the most consistently raised concerns was the fragmented and short-term nature of current funding structures. Many organizations are limited by project-based grants that do not support long-term planning or systemic impact. A common or joint fund was suggested as a possible solution to reduce competition and better pool resources. The sector's reliance on a small number of donors was also highlighted as a vulnerability that constraining flexibility and innovation.

Some participants proposed expanding the donor base by engaging countries not yet actively funding anti-trafficking efforts. Japan was mentioned as one example. Speakers also explored underused options for resourcing, including the recovery and redirection of seized criminal assets such as houses, vehicles, or other material goods. These could be used to support victims or fund restitution efforts.

The private sector was also mentioned as a potential contributor, particularly in terms of covering unpaid wages and contributing to remedy processes, but also in supporting anti-modern slavery initiatives. Improving efficiency was another area of discussion. Ideas included shared procurement processes, using the same vetted service providers, and increasing collaboration across organizations. Addressing duplication of work and reducing unnecessary operational costs was seen as key to maximizing the value of limited resources.

One practical proposal was to improve access to information by compiling and publicizing a list of free or open resources available to NGOs. Making these tools more visible and easier to use could support smaller organizations that lack the same access to donor networks or technical infrastructure. The session addressed power imbalances between large international organizations and smaller, often local, NGOs. There was concern that international NGOs and UN agencies sometimes compete directly with community-based groups for funding, even though those local actors are often closest to affected communities. Speakers emphasized the importance of shifting both funding and influence to these grassroots organizations. Decentralizing decision-making and relocating more headquarters outside of high-income countries was also suggested.



## **KEY TAKEAWAYS**

#### **Overreliance on a Few Donors Creates Systemic Fragility**

The sector depends heavily on a small group of donors, mostly governments and philanthropic foundations, making it vulnerable to political shifts and funding cuts.

#### Short-Term, Fragmented Funding Hinders Long-Term Impact

Project-based and donor-driven funding cycles limit systemic change and undermine the ability of organizations to plan and invest sustainably.

#### **Need for an Industry Body to Advocate and Coordinate**

A shared advocacy platform or "industry body" could represent the sector, strengthen visibility, attract new funding, and ensure interventions are aligned and effective.

#### **Reduce Duplication and Improve Efficiency**

Organizations should explore shared procurement, common service providers, and deeper inter-organizational cooperation to cut overhead costs and increase impact.

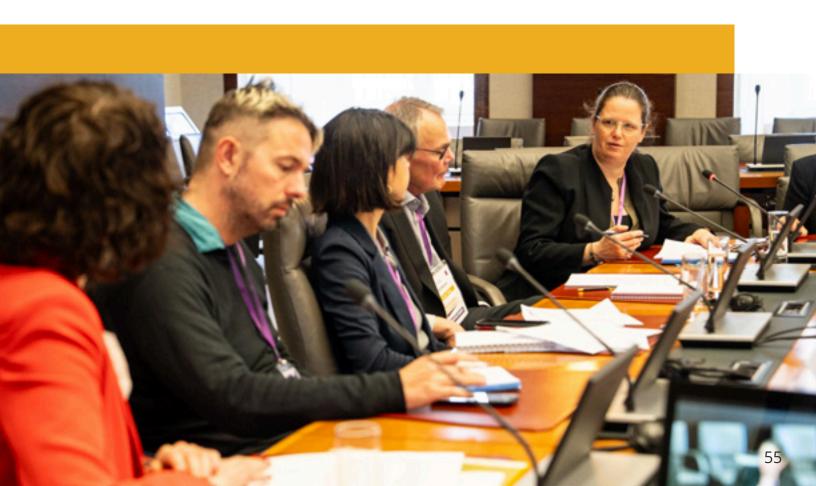
#### **Need for Structural Reform and Shared Responsibility**

Panelists called for diversified funding, including through private sector engagement, local industry partnerships, and national social protection systems.

# PANEL DISCUSSION: DEBUNKING MYTHS AROUND MANDATORY HUMAN RIGHTS DUE DILIGENCE (MHRDD)

The third panel discussion of day two focused on unpacking the most persistent myths surrounding Mandatory Human Rights Due Diligence (MHRDD), particularly within the context of the EU Corporate Sustainability Due Diligence Directive (CSDDD). Bringing together practitioners from civil society and industry, the panel confronted misconceptions that continue to fuel opposition or confusion around due diligence, especially from sectors claiming it is too complex, costly, or anti-competitive to implement effectively.

At the center of the discussion was a shared understanding that MHRDD is not about perfection or omniscience but about structured, continuous improvement. Panelists emphasized that due diligence is a dynamic and risk-based process, not a static compliance checklist. They argued that portraying it as overly complicated distorts both its purpose and its practical design. Contrary to this myth, companies are not required to detect any possible harm across their supply chains in real time. Instead, what is expected is a reasoned process: starting with broad risk of scoping, prioritizing salient issues, and applying context-appropriate tools.





The myth of complexity was challenged by pointing out that there are already large businesses doing it well, and to the abundance of sector-specific tools and resources already available, ranging from risk maps and traceability systems to grievance mechanisms and open data platforms. At the same time, the panel acknowledged that agriculture and commodity-based supply chains bring unique challenges, particularly in contexts of informal work, data scarcity, and smallholder predominance.

These challenges shifted the discussion to the cost of due diligence. Panelists agreed that while due diligence does involve costs, particularly at the outset, framing it as prohibitively expensive misses the broader business case. Integrating social and environmental risk assessments into core company strategy not only reduces exposure to reputational and legal risks but also supports resilience, brand value, and investor confidence. In this light, due diligence is not a financial drain but a long-term investment. Additionally, the more companies engage, the more synergies would be created, reducing costs significantly.

Competitiveness emerged as another myth under scrutiny. Rather than hampering business, panelists argued that binding due diligence requirements can actually support healthy competition by raising the floor for corporate behavior. When all companies are held to common expectations, responsible practices become a baseline, not a liability. The conversation echoed parallels with financial reporting standards which once faced similar resistance but ultimately became essential for investor trust and market transparency.

The panel discussion advocated for a shift from "control" to "influence." The myth that companies must, or even can, control their entire supply chains was strongly rejected. Instead, the discussion emphasized that due diligence is about leveraging influence, fostering trust-based relationships, and building supplier capacity over time. Effective engagement requires long-term partnership, not surveillance. Where control is impossible, influence through support, incentives, and shared responsibility becomes the most effective and ethical pathway,

This led to a discussion of the contested role of Small Medium-sized Enterprises (SMEs) in the due diligence framework. While some narratives present SMEs as overwhelmed or ill-equipped, the panel pushed back against this generalized view. Many SMEs, particularly those rooted in ethical or cooperative models, are leading innovators in sustainable sourcing. The real challenge lies not in SME capacity but in the behavior of larger buyers who pass down burdens without offering support or transparency. The panel called for targeted tools, funding, and simplified reporting pathways to enable SMEs to participate meaningfully in responsible supply chains. These provisions to avoid negative impacts on SMEs were initially reflected in the CSDDD text, but speakers expressed concern that recent revisions (particularly the so-called "omnibus" proposal) threaten to unravel these protections.

Another myth examined was the idea that civil society organizations (CSOs), particularly local ones, are antagonistic or unconstructive. Speakers contrasted this narrative by describing CSOs as essential partners in risk identification, grievance response, and community engagement. However, frustration among local actors was acknowledged, often stemming from one-way consultations, extractive data requests, and engagement processes divorced from their lived realities. Communities want to be heard, but on their own terms and around the issues that matter most to them, such as wages, land use, and basic dignity.



Similarly, concerns about civil liability provisions triggering a wave of opportunistic lawsuits were firmly rejected. Legal action was described as rare, complex, and typically pursued only when other accountability avenues fail. Far from open floodgates, civil liability was seen as a critical backstop and a mechanism to ensure that harm is addressed when preventive efforts fall short. The existence of legal recourse also strengthens the credibility of due diligence systems, making mechanisms more effective through the potential for enforcement.

Throughout the discussion, the panelists returned to one unifying theme: the integrity of due diligence depends on doing it well, not doing it all at once. When designed and implemented appropriately, due diligence can be an engine for responsible business transformation, not a burden, and a scaffold for building more ethical and resilient supply chains. The myths surrounding it whether about cost, control, or complexity are not grounded in evidence, but in fear. The task now is to ensure that legislation like the CSDDD lives up to its potential, by remaining robust, clear, and centered on the people it is meant to protect.



## **KEY TAKEAWAYS**

#### Due Diligence is Achievable with Existing Tools and Knowledge

The speakers described how companies can identify and prioritize forced labor risks using, for example, public databases, risk maps, worker-centered grievance mechanisms, and sector-specific resources.

#### Due Diligence in Agriculture and Informal Sectors Requires Local Engagement and Long-Term Partnerships

Commodity-based supply chains present real data and access challenges. Panelists emphasized the need to build trust with local communities, invest in traceability, and engage suppliers meaningfully over time.

#### Remediation is the Real Test of Due Diligence

While risk identification is improving, long-term remediation, particularly in the context of endemic poverty and weak public services, remains the greatest challenge. Also, there is a need for enhanced collaboration with public institutions to address the root causes of forced labor.

#### **Appropriate Due Diligence is Scalable and Context-Specific**

Speakers explained that companies are not required to control their entire supply chain but must conduct reasonable, risk-based assessments and respond accordingly. They emphasized the importance of selecting the right tools and expertise based on the nature of the risk.

#### Costs are Outweighed by Long-Term Value and Risk Prevention

All panelists agreed that due diligence involves costs, especially during setup, but the costs are modest compared to the risks of inaction.

#### **Urgent Legal Clarity and Guidance are Essential for Fair Competition**

Panelists supported clearer, harmonized guidance from the EU to prevent fragmentation and help companies meet due diligence expectations.

#### **MHRDD Should Empower SMEs and Suppliers**

Speakers cautioned against relegating due diligence responsibilities down the supply chain without support. There is a need for equitable burden sharing, technical assistance, and long-term supplier relationships. The panel also criticized the European Commission's omnibus proposal for weakening safeguards intended to protect smaller suppliers from excessive compliance demands.

#### **Civil Society and Communities are Essential Partners**

Panelists rejected the idea that local CSOs and workers are antagonistic. They emphasized the need to invest in trust-building and mutual respect in supplier relationships.

# WORKSHOP: A1 BEST PRACTICES ON COMMUNITY GRIEVANCE MECHANISMS AND REMEDIATION

This workshop explored the role and implementation of community-based grievance mechanisms in addressing forced labor and child labor, particularly through the lens of a practical pilot initiative in the cocoa sector. The session aimed to create space for collective reflection on what it takes to make such mechanisms effective, accessible, and trusted at the community level.

The discussion opened with an overview of forced labor and the definition and scope of grievance mechanisms. These mechanisms were defined not only as tools for reporting violations but also as systems to resolve disputes, provide redress, and prevent future harm. Participants reviewed the <u>eight effectiveness criteria laid out in the UN Guiding Principles on Business and Human Rights</u> as a foundation for good practice.

A detailed presentation followed on a model piloted by the International Cocoa Initiative (ICI) in Ghana. This approach centered on Community Protection Committees (CPCs) composed of trained local volunteers representing a broad range of community stakeholders, including workers, employers, and traditional authorities. These committees serve as accessible, first-line channels for individuals to raise grievances, resolve conflicts through mediation, and—if needed—refer serious cases to district-level authorities such as labor officers or the police.





Since its implementation, the mechanism received over 550 grievances, with the most common issues being non-payment of wages and task-related disputes. While most cases were resolved through listening and local mediation, around a dozen were referred to external authorities for further action. Common resolutions included written contracts, financial compensation, and shared work agreements. To ensure broad accessibility, the ICI developed both text-based and illustrated contract templates, which proved particularly useful in communities with limited literacy.

The presentation identified seven key steps for setting up a community-based grievance mechanism, starting with community engagement and joint design to ensure local ownership. Steps included inclusive membership, leveraging existing structures when possible, training committee members and authorities, establishing trusted and multi-channel reporting options, and raising community awareness. Reporting channels were designed to account for barriers such as literacy, language, and access to technology.

Key lessons included the importance of ongoing monitoring, tracking case numbers, resolution rates, and user satisfaction, and using this feedback to adapt and improve. Sustainability was flagged as a challenge, and the need for financial incentives or income-generating alternatives for committee members was highlighted. The pilot project also pointed to the value of formal recognition by district authorities, and stronger collaboration with companies to support the mechanism and improve coordination.

# **KEY TAKEAWAYS**

#### **Grievance Mechanisms Serve a Broader Purpose**

Beyond reporting violations, effective grievance mechanisms are also tools for resolving disputes, delivering redress, and preventing future harm within communities and workplaces.

# Training and Continuous Learning is Foundational for Community-Based Mechanisms and Members

Members must be trained in labor rights, confidentiality, trauma sensitivity, and mediation. Capacity building should be ongoing, and take into account lessons learned from evaluations.

#### The Sustainability of Community-Based Mechanisms is a Challenge

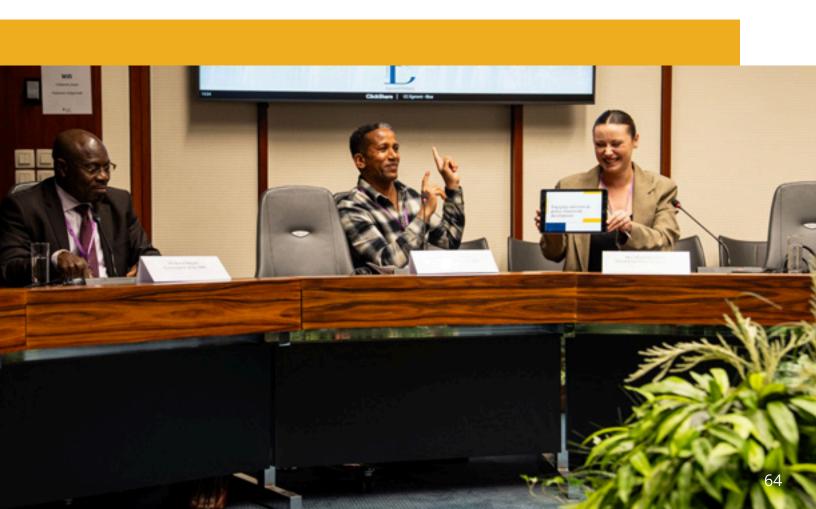
Providing incentives (e.g., stipends or income-generating opportunities) can help sustain previous volunteer-based grievance mechanisms over time.

# WORKSHOP: A2: ENGAGING SURVIVORS IN POLICY FRAMEWORK DEVELOPMENT

This workshop session explored how survivors of trafficking and exploitation can be meaningfully engaged in shaping policy and practice. It opened with a proposed group reflection on why survivor participation matters and the conditions under which it should take place.

Several contributors emphasized that survivor input should not be reduced to storytelling, but recognized as lived expertise. Rather than extracting personal narratives to fit institutional expectations, participants called for inclusive and collaborative processes in which survivors help define priorities and identify policy and practice gaps.

Participants urged a shift from symbolic inclusion to structural participation. Survivor involvement must be designed as a two-way process of mutual learning, bringing together professionals and survivors to co-develop approaches, rather than reinforcing hierarchical roles.





There was a shared recognition that survivors are not a monolithic group. Many face exclusion due to language barriers, low literacy, or ongoing trauma, while others may be highly engaged and professionally active; and all need to be included. Tokenism was flagged as a risk, especially when institutions select a single, visible individual who fits their requirements.

Throughout the conversation, the need for fair compensation was clear. If survivors are invited to contribute their time, insights, and labor, this must be formally recognized, financially and structurally, not assumed to be voluntary or symbolic.

Participants also referenced tools and frameworks developed by organizations such as the Survivor Alliance, the National Survivor Network, and the Salvation Army. These were highlighted as useful resources for guiding ethical and effective engagement. Still, it was noted that not every survivor will wish to participate, and any approach must respect personal readiness and choice.

Ultimately, participants called for survivor engagement that is purposeful, inclusive, and on survivors' terms; avoiding extractive practices and ensuring that involvement is meaningful, safe, and transformative.

# **KEY TAKEAWAYS**

#### **Survivor Input Must Shape Policy**

Survivors offer vital insights into the existing gaps and unintended harm in current systems.

#### **Engagement Must be Safe, Supported, and Reciprocal**

Survivors come from diverse backgrounds, with different levels of readiness, interests, and expertise. One size does not fit all.

#### **Practical Barriers Must be Addressed**

Language accessibility, financial compensation, and trauma-informed facilitation are necessary to ensure survivor participation is meaningful and not extractive.

#### **Inclusion in Policy Development Must Move Beyond Storytelling**

While personal narratives are powerful, survivor engagement should prioritize co-designing frameworks, identifying policy gaps, and informing service delivery, not just testimony.

# **REGIONAL CHALLENGES IDENTIFIED ON DAY TWO**

# Escalating and Evolving Trafficking Driven by Conflict, Displacement, and Digital Platforms

Trafficking in persons is intensifying and becoming more sophisticated, fueled by armed conflict, mass displacement, and the proliferation of underregulated online platforms. Traffickers increasingly use social media, messaging apps, and digital tools, including GenAI, to recruit, exploit, and distribute illegal content.

#### The Structural Nature of Child Labor in the Garment Industry

Child labor is not incidental—it is embedded across all stages of garment production, driven by fast-fashion business model, informal employment, low wages, and insufficient enforcement.

#### **Implementation Gaps in Corporate Responsibility Frameworks**

Despite new legislation like the EU CSDDD and Forced Labor Regulation, there are concerns about implementation due to possible weak reporting requirements, lack of supplier accountability, unclear obligations for remediation, and ambiguous guidelines that limit real-world impact.

#### **Policy Lag and Legal Fragmentation**

While exploitation evolves rapidly, legislation often lags behind. Gaps in international cooperation and a lack of harmonized enforcement allow exploitation to persist with impunity.

#### **Fragmented and Unsustainable Funding Models**

The sector relies heavily on a few donors and short-term project grants. This limits organizations' ability to scale, plan long-term, or build resilient community systems.

#### **Survivor Exclusion from Policy Development**

Survivors are often invited only to share personal stories, not to shape policy. Additionally, institutions persist in having a top-down mentality in which only survivors that fit their criteria are able to participate in policy-discussions.

# PROPOSED SOLUTIONS TO THE IDENTIFIED CHALLENGES

# **O1.** Tech Companies Must Collaborate on Online Safety, and Better Online Regulation Must Ensure Those Efforts are Made

Enact legislation requiring tech companies to detect, report, and prevent trafficking-related activity online, including Al-generated content. Apply Al and digital tools for monitoring and traceability.

# **02.** Advocate for Living Wages to Combat Child Labor

Campaign for wage reform that ensures adults earn enough to support their families. Addressing wage inequality is foundational to reducing household dependence on child labor.

# **13.** Integrated and Enforceable Due Diligence and Import Bans

Ensure binding legislation like the EUFLR and the CSDDD includes lower-tier suppliers and mandates transparent supply chain mapping, remediation processes, and accountability across sectors.

# **04** Equip Lower-Tier Suppliers for Compliance

Provide technical support and shared resources to help small suppliers meet due diligence expectations.

# **05.** Funding System Reform

Develop new models like a global SDG 8.7 fund, create a coordinated Industry body, court-ordered contributions, and multi-source financing, and avoid duplication of efforts.

# **06.** Survivor-Led Policy Design

Move beyond storytelling toward meaningful co-design of policies and programs. Provide compensation, training, and trauma-informed engagement tailored to survivors' diverse experiences and capacities.

### **07** Sustained Investment in Survivor and Community Infrastructure

Support community-based grievance mechanisms (CBGMs), local protection committees, and survivor councils with long-term resources and inclusive governance.

# Day Three

# **OVERVIEW OF SPEAKERS**

- Bagula, Donat Government of the Democratic Republic of the Congo
- Mbouzie, Angelique Ministry of Labor, Government of Cameroon
- Obokata, Tomoya UN Special Rapporteur on Contemporary Forms of Slavery
- Adam, Isabelle International Cocoa Initiative (ICI)
- Dubbelt, Marco Global March Against Child Labour
- Ewart-James, Joanna Freedom United
- de Franchis, Laura The Alternatives Factory
- Lea, Sian Anti-Slavery International
- McCarthy, Timothy Patrick Free the Slaves
- Morgan, Jeff SUCDEN Trading
- Reid, Sam Migrant Help
- Singh, Suhasini Fair Wear Foundation
- Wallis, Andrew Unseen UK
- Waruzi, Bukeni Free the Slaves



# **OPENING REMARKS**

The opening remarks on Day 3 highlighted frontline efforts to support displaced and exploited populations, emphasizing the critical importance of centering survivor and migrant rights within anti-trafficking strategies. Drawing from practical experiences, the speaker underscored the necessity of inclusive engagement tools—such as multilingual and visually accessible materials—to ensure meaningful participation for individuals who do not speak the predominant language.

The speaker provided a thoughtful overview of the previous day's discussions, reinforcing the urgency of reframing narratives around modern slavery by recognizing the individuals behind the statistics. Child trafficking prevention, in particular, was identified as needing multidisciplinary responses that prioritize the best interests of children.

Reflecting on the first panel from Day 2, which focused on child labor within the textile industry, the discussion highlighted structural economic drivers of exploitation. Research from Bangladesh illustrated that significant wage increases—from approximately \$100 to \$450 monthly per worker—are essential to lift families above the poverty threshold and reduce the economic pressures driving child labor. Panelists urged businesses to transcend mere compliance by adopting proactive and preventive strategies across supply chains.





The second panel addressed challenges related to the sustainability of global funding to combat forced labor, child labor, and trafficking. Speakers expressed concern over recent funding reductions, notably the withdrawal of support from key donors such as USAID and reduced contributions from European sources, resulting in disrupted resettlement programs and service closures. Proposed solutions included advocating for more equitable global resource allocation, enhancing donor accessibility for smaller organizations, and establishing a collective advocacy framework to unify lobbying efforts across the sector.

The final panel examined the complexities surrounding mandatory human rights due diligence and challenged prevalent misconceptions. It emphasized the importance of adopting trust-based, risk-oriented methods, clarifying that companies, while influential, cannot entirely control their supply chains. The discussion underlined the critical role of transparency and sustained stakeholder engagement. Additionally, concerns were raised about potential legal uncertainties arising from the EU Omnibus Package, cautioning that these ambiguities could undermine economic predictability.

# **KEY TAKEAWAYS**

#### **Centering Survivor and Migrant Voices Using Inclusive Tools**

Emphasis was placed on ensuring meaningful participation of displaced and exploited individuals through accessible methods like multilingual and visual resources.

#### **Tackling Child Labor Demands Structural Change and Fair Wages**

Research showed that poverty wages are a key driver of child labor, and panelists urged companies to adopt preventive strategies across supply chains—not just compliance measures.

#### **Funding Cuts and Legal Uncertainty Threaten Anti-Trafficking Efforts**

Recent aid reductions and unclear legislation, such as the EU Omnibus Regulation, were identified as major challenges, with calls for more equitable funding, better donor access for small organizations, and coordinated advocacy.



# **KEYNOTE: REFRAMING MODERN SLAVERY IN EUROPE**

The final keynote of the forum offered a wide-ranging, candid conversation reflecting on the deeper forces currently driving modern slavery. Rather than delivering formal speeches, the speakers engaged in a discussion that explored both structural challenges and the limitations of current responses. They began by identifying root causes that remain persistent across contexts: poverty, inequality, discrimination, lack of access to decent work and education, and displacement from war and climate crises.

In Europe, the demand for cheap labor, restrictive migration policies, war, and growing economic hardship were highlighted as key enablers of exploitation. Forced labor and child trafficking, they stressed, cannot be addressed without confronting these conditions. Additionally, the gap between legal frameworks and meaningful enforcement highlights that, while many countries have strong laws on paper, enforcement is inconsistent, underfunded, or obstructed by political concerns. Victims often fear coming forward, and authorities may lack the tools or willingness to act. The failure to create secure, supportive environments for survivors undermines identification and justice.





Technology was described as a double-edged sword: a powerful tool for traffickers, but also a potential asset in prevention and detection. Speakers stressed the urgent need for regulation, especially around artificial intelligence, which is rapidly evolving beyond the reach of current policies. Without proper oversight, tech-facilitated exploitation, particularly of children, will only accelerate.

Attention then turned to the role of business and government. The speakers supported mandatory due diligence measures but cautioned that without clear enforcement mechanisms and civil society involvement, such frameworks risk being toothless. Larger companies were seen as having the capacity to lead, while smaller enterprises may need phased support, they are also key players in addressing force labor. Across the board, genuine accountability, not just box-ticking, was described as essential.

In a closing reflection, the question was posed: Why has the number of people in slavery increased over the last 25 years, despite more global attention and investment? The answer, offered bluntly, pointed to a lack of political will, the enduring power of profit-driven exploitation, and an international system still struggling to prioritize human dignity over economic interest. The call was clear: stake-holder coordination, survivor leadership, and systemic change are needed if meaningful change is to be achieved.

# **KEY TAKEAWAYS**

#### **Root Causes are Interconnected**

Drivers of modern slavery include the economic model, conflict, climate change, restrictive immigration laws, and racial/gender-based discrimination.

#### **Policy and Law Must be Enforced**

Most countries have decent laws against modern slavery, but enforcement remains weak. Victims often fear coming forward due to lack of protection.

#### **Migration Policy and Labor Gaps Must Align**

Legal migration pathways and equal labor rights can reduce vulnerability. Labor shortages should not justify exploitation.



#### **Due Diligence Must be Mandatory**

Voluntary approaches are no longer enough. Governments must enforce business human rights responsibility through legislation, penalties, and support for SMEs.

#### **Al Regulation is Urgent**

While tech tools can aid prevention, traffickers are ahead. Without strong oversight, AI will continue to enable exploitation, especially of children.

#### Multi-Stakeholder Collaboration is Needed

Mobilizing resources towards our shared agenda reminds us to prioritize efficiency as many organizations, governments, and companies still work in silos.



# PANEL DISCUSSION: ADDRESSING FORCED LABOR AND CHILD LABOR IN THE AGRICULTURAL SUPPLY CHAIN

This panel confronted one of the most entrenched and globalized forms of exploitation: forced labor and child labor in agriculture. With insights spanning policy, practice, geography, and perspective; from European migration systems to cocoa fields in Cameroon and coconut farms in the Philippines, the discussion laid bare the structural drivers of abuse in the sector, while identifying limitations and opportunities for systemic reform.

At the core of the conversation was a recognition that agriculture, while often overlooked in Europe and popular narratives about modern slavery, is in fact one of its primary origins. Globally, 60 percent of all child labor occurs in this sector, with an estimated 98 million children engaged in farming, fishing, and related activities. Much of this labor is invisible, unpaid, and carried out by family members in conditions that frequently cross the line into hazardous or exploitative. This continuum of exploitation, from early informal work to forced labor and debt bondage, was central to the discussion.





The sheer scale of the agricultural sector requires proportionately great attention to labor standards. Yet, forced labor in agriculture remains severely underreported, particularly within European contexts. In countries such as the UK, data from national helplines and referral mechanisms point to labor exploitation as the most common form of modern slavery, with agriculture a leading source. This stands in stark contrast to official EU-wide figures, which continue to report sexual exploitation as the predominant form. Panelists suggested this discrepancy indicates a significant gap in detection, recognition, and enforcement.

One of the most urgent issues raised was the intersection of labor exploitation and migration systems. Migration policies in many EU member states, have inadvertently created conditions conducive to modern slavery. Seasonal worker schemes, while designed to fill labor shortages, often mirror exploitative models seen elsewhere. Tied visas, recruitment fees, and lack of worker mobility or legal protection create a power imbalance that leaves migrant laborers extremely vulnerable. The discussion also highlighted regulatory weaknesses and the inconsistent application of labor standards across Europe. While EU-level directives such as the Corporate Sustainability Due Diligence Directive and the Forced Labour Regulation offer tools to strengthen accountability, panelists warned that without harmonized enforcement and survivorcentered implementation, these frameworks risk falling short. The need for binding employer responsibilities, such as the principle that employers, not workers, should bear recruitment costs, was emphasized throughout the conversation.

From the perspective of producer countries, the conversation moved to the challenges of compliance amid resource constraints. In Cameroon, for instance, agriculture is a cornerstone of the economy and a major export sector, particularly for bananas and cocoa. Government representatives described national initiatives to align with international standards, including ratification of core ILO conventions, the development of national action plans, and active participation in Alliance 8.7. However, they stressed that expectations from trading partners, particularly under new EU laws, must be accompanied by support for capacity building, compliance timelines, and local realities.

Panelists from international NGOs underscored the importance of rethinking how civil society and development actors approach supply chain interventions. Many current projects are donor-driven, siloed, and disconnected from the lived experiences of affected communities. Several recommendations emerged to address this disconnect. First, NGOs must deepen their technical understanding of the sectors in which they intervene, learning not just about labor violations but also the production systems, crop cycles, and value chains involved. Second, cross-organizational collaboration is essential to avoid duplication and fragmentation. Third, a shift is needed from issue-specific projects to integrated, community-led approaches that target the root causes of exploitation, including poverty, lack of access to education, and weak governance.





A key strategy discussed was the use of area-based approaches to eliminate child labor. Rather than focusing solely on traceable supply chain links, which are often unfeasible in smallholder-dominated sectors. This model targets geographic areas. However, panelists warned that these interventions are only sustainable if matched by long-term support from companies and buyers, particularly in the form of living income initiatives, education access, and decent work promotion.

Panelists called for a more honest reckoning with the role of consumer economies in sustaining exploitation. The global addiction to cheap food and aggressive price competition among supermarkets was identified as a core structural issue. If buyers continue to push costs down the supply chain without accounting for the social and environmental toll, labor abuses will persist. A reorientation toward procurement models that prioritize social value and equity is critical. This shift also requires adjusting public and investor expectations by moving away from a singular focus on profit toward long-term sustainability.

Legal accountability emerged as another pillar of the solution set. Strategic litigation, such as recent cases targeting global coffee brands for abuses in Brazilian supply chains, can be a powerful lever for change. However, civil society and survivor groups must be utilized to pursue such cases, and laws must be structured to enable access to justice.

## **KEY TAKEAWAYS**

#### **Migration Schemes Enable Systemic Exploitation**

Migrant workers often arrive indebted and are afraid to pursue justice under the thread of being deported, creating the perfect conditions for coercion.

#### **NGOs Must Collaborate and Localize Their Approaches**

Civil society must move beyond donor-driven silos, develop deep sectoral knowledge, and work in partnership with trade unions and local communities for systemic impact.

#### Poverty is the Root Driver of Child Labor

Speakers agreed that unless families earn a living wage, children will continue to work. Solutions must therefore include economic empowerment and improved access to education, not just compliance measures.

#### The Economy Incentivizes Exploitation

Decades of cheap food and consumer price competitions have created unsustainable supply chain pressures. Social value, not just profit, must drive procurement decisions.

#### **Legal Enforcement and Worker Voice are Essential**

Panelists called for stronger enforcement mechanisms and for lived experience and worker input to be built into the policy-making process.

# PANEL DISCUSSION: COORDINATING MULTI-STAKEHOLDER EFFORTS IN GLOBAL SUPPLY CHAINS

The final panel of day three of the Europe Regional Freedom from Slavery Forum centered on advancing collaborative approaches to tackle forced labor and child labor in global supply chains. Panelists explored both the benefits and challenges of multistakeholder coordination, offering practical examples, critical reflections, and forward-looking insights on improving labor rights outcomes through collective action.

The session began with a discussion on the importance of multi-level collaboration involving businesses, civil society, governments, and affected communities. Emphasis was placed on the need for advocacy and action to be grounded in the realities of those most impacted by labor abuses. A successful example was shared through the Bangladesh Accord, a binding agreement that brought together brands, factory representatives, and workers in a shared governance structure that empowered workers to monitor and report on safety issues. Over time, this collaborative model led to the remediation of the majority of identified hazards and the training of millions of workers, showing the power of structured, inclusive cooperation.





The panel also examined a contrasting case: the Corporate Sustainability Due Diligence Directive (CSDDD). In its early stages, the directive represented a strong model for inclusive policymaking, developed through broad consultations with stakeholders from civil society and affected communities. However, during the so-called "Omnibus" revision, this collaborative foundation was undermined. The process became closed-door, with participation limited to a narrow set of actors including lobbyists from extractive industries; while key voices, such as civil society and representatives from the Global South, were excluded. As a result, the revised directive was seen as weaker, both in terms of worker protections and clarity for businesses. This highlighted the risks of non-inclusive and opaque processes, underscoring the importance of sustained, genuine consultation.

Panelists brought diverse expertise spanning labor rights, regulatory policy, and supply chain management. One speaker emphasized the need for country-specific strategies, noting that forced labor and child labor manifest differently depending on regional, cultural, and economic contexts. Guidance must therefore be developed in close consultation with local worker organizations and experts, and supported by practical business input to ensure feasibility and effectiveness.

From a government perspective in the Global South, implementation remains a significant challenge, particularly in conflict-affected and resource-rich areas. These zones are often destabilized by violence, displacement, and exploitation, making policy implementation complex. Despite these difficulties, national-level coordination mechanisms have been established to bring together diverse stakeholders, allowing for the co-development of regulations and the collective planning and monitoring of interventions, which was determined a useful practice.

A major theme of the discussion was the urgent need to shift from a reactive to a proactive approach. Too often, companies and institutions wait until crises emerge, whether public scandals, legal violations, or reputational damage, before taking action. Panelists called for earlier risk assessments, stronger supplier relationships, and deeper engagement with affected communities to identify and mitigate problems before harm occurs. Proactive collaboration not only prevents abuses but creates more resilient supply chains.

From a private sector perspective, panelists agreed that collaboration is not optional, it is a necessity. However, a recurring question was: who takes the lead and who should convene these collaborative spaces? Without clear leadership, initiatives risk duplication and fragmentation, which wastes resources and undermines effectiveness.





An illustrative example was raised in the context of the European Union Deforestation Regulation (EUDR) implementation, which mandates traceability and compliance with environmental and human rights standards. In response, many companies were forced to break internal silos to meet new requirements. While this created new efficiencies, it also exposed the challenges of fragmented efforts and inconsistent approaches. Without centralized guidance or shared tools, businesses often duplicate work or develop incompatible systems, especially in relation to traceability and due diligence.

Technology was also identified as a key enabler of effective, proactive coordination. Digital traceability platforms, some of which are open-access and freely available, now allow even small-scale producers to map their supply chains better. When used collectively and transparently, these tools can help align industry efforts, reduce duplication, and increase accountability across the supply chain.

In conclusion, the panel stressed that while collaboration is often slow, difficult, and hampered by power imbalances, its benefits far outweigh the challenges. Systemic change toward stronger laws, safer workplaces, and empowered workers will only come through inclusive, proactive, and well-coordinated efforts. True progress depends on shifting from reaction to prevention and ensuring that the voices of those most affected remain at the center of every decision.

## **KEY TAKEAWAYS**

#### Binding, Worker-Centered Frameworks Can Lead to Real Change

The <u>International (Bangladesh) Accord</u> stands out as a success story of collaboration between brands, factories, and workers. Empowering workers as grievance raisers and auditors builds trust and results.

#### **Inclusive Policymaking is Critical for Legitimacy and Impact**

Laws and regulations developed without meaningful input from affected communities, risk losing effectiveness.

# Brands Must Move from Corporate Social Responsibility Projects to Systemic Changes

Isolated projects are insufficient. Businesses must invest in structural reform, better pricing, and risk-based approaches across their entire supply chains.

#### The Risk of Fragmented Due Diligence is Growing

Without coordination, companies risk building misaligned due diligence frameworks, increasing costs and legal uncertainty, and reducing impact.

#### Stronger Infrastructure is Needed to Support Coordination

This includes shared data platforms, regular cross-sector convening, and funding models that incentivize collaboration over competition.

# **SUMMARY OF INSIGHTS FROM THE EUROPE REGIONAL FORUM**

In the closing session of the Forum, Laura de Franchis presented a summary of the key insights and takeaways from the 2025 Europe Forum. We are grateful to Laura for allowing us to share the transcript of her presentation in this report.

The three-day Forum provided profound insights and crucial reflections structured around several key themes: legal and regulatory frameworks, survivor leadership, multi-stakeholder coalition building, sector-specific challenges, resource availability, and the underlying importance of centering humanity in the movement.

#### **Legal and Regulatory Frameworks**

Discussions on the EU Forced Labor Regulation and the Corporate Sustainability Due Diligence Directive (CSDDD) were illuminating and exemplified substantial progress, but also highlighted the significant challenges and myths that persist. Panelists clarified the practical scope, strengths, and limitations of these frameworks, recognizing the importance of debunking misconceptions and ensuring meaningful compliance. Critical insights emerged around enforcement complexities and the urgent need for practical implementation strategies.

Participants found that elaboration of the CSDDD is needed regarding risk assessment, implementation costs, the ensuing competition, enforceability, the impact on supply chains, and the possibility of endless litigation.





#### **Survivor Leadership and Lived Experience**

In Europe, engagement with lived experience experts is minimal in the context of policy development, program implementation, and remediation processes.

The powerful guidance of survivors at the Forum underscored an essential point: survivor voices must be genuinely centered, resourced, and empowered—not merely extracted and valued symbolically. The Forum reinforced the movement's responsibility to platform and listen to those often rendered invisible or silent. The survivors guided the Forum's dialogue in the direction of meaningful inclusion, trauma-informed care, and ethical interactions guided by a commitment to "do no harm."

#### Multi-Stakeholder Coalition: The "Coalition of the Willing"

The idea of a "Coalition of the Willing" emerged, emphasizing the necessity of collaboration amongst all stakeholders—the private sector, governments, civil society, academia, persons with lived experience and more. Moving forward requires a strategic, proactive approach as opposed to a patchwork, reactive approach. This would entail cross-sectoral coordination for collective action and advocacy, capacity building, and clear communication across cultural and sectoral differences.

#### Sectoral Challenges: Cocoa, Agriculture, and the Textile Industry

Insights from discussions on industries such as cocoa, agriculture, and textiles revealed profound complexities in supply chain challenges. Clear standards, patience, and nuanced approaches alongside an urgency for immediate action are essential. Other sectors, notably mining and domestic work, also require attention, even if they were less visible throughout the Forum.

#### **Resource Mobilization and Challenges**

Funding cuts resulting from policies of austerity are affecting the sector in a disproportionate manner. Forced labor, child labor and human trafficking are deeply affected by funding cuts from the US government and European countries. Forum attendees called for other governments and the private sector to step up to fill these gaps.

#### The Importance of Humanity: Trust, Emotions, and Complexity

Fundamentally, the Forum reminded participants of the importance of trust, strategic connection, and humanity in all endeavors. Trust-building, empathy, as well as outrage and anger are essential sources of energy and insights that push the movement to action.

Holding space for patience alongside urgency became an underlying theme of the Forum. The Forum's dialogue underscored that complexity demands careful, collective navigation.

"Never doubt that a small group of thoughtful, committed citizens can change the world; indeed, it's the only thing that ever has."

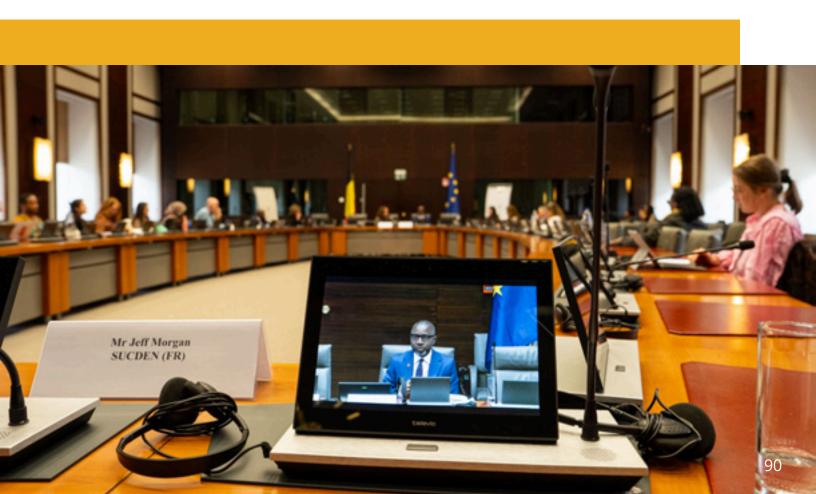
— Margaret Mead, American Cultural Anthropologist and Author



# **CLOSING OF THE FORUM**

The Forum's closing session provided an overview of next steps and acknowledgements. Participants were informed that a draft summary of the forum's outcomes would be shared by email, with a request for further contributions to ensure a comprehensive final document. The full report would accompany these outcomes. Gratitude was expressed to the Kingdom of Belgium for its support, as well as to the organizing committee composed of civil society, government, and private sector representatives. The internal team and volunteers responsible for logistics and on-site coordination were also recognized, along with board members and interns who contributed behind the scenes.

Looking ahead, it was confirmed that the Europe Freedom from Slavery Forum will become an annual event due to the increasing relevance of European regulations on forced and child labor. The session also announced the upcoming Global Freedom from Slavery Forum, to be held in Paris in November, with more details to follow. Participants were encouraged to stay engaged, complete the follow-up survey, and continue mobilizing within their networks. The Forum was emphasized as an open, inclusive space for dialogue, learning, and collaboration in the fight against modern slavery.



## REGIONAL CHALLENGES IDENTIFIED ON DAY THREE

#### **Tokenistic Survivor Inclusion Persists**

Despite increasing recognition, survivors of modern slavery are still often relegated to symbolic roles without genuine power or long-term support in shaping policy, programs, or funding priorities.

#### **Exploitative Visa Schemes and Labor Policies**

Temporary migration frameworks like the UK's seasonal worker visa enable exploitation through debt bondage and poor oversight, mirroring kafala-like conditions.

#### **Underreporting Agricultural Exploitation**

Forced labor in agriculture remains largely invisible. The existing data vastly underrepresents the real scale of labor abuse and forced labor in food production.

#### **Systemic Undervaluing of Labor in Supply Chains**

Global agricultural and food systems prioritize low consumer prices, creating structural incentives for exploitation, underpayment, and child labor.

#### **Lack of Enforceable Due Diligence Frameworks**

Despite emerging laws, unclear guidelines and weak enforcement potential threaten the effectiveness of due diligence mechanisms.

### **Working in Silos Limits Impact**

Collaboration is often hindered by stakeholders working in silos—within companies, across sectors, and between regions. Businesses, civil society, and governments frequently operate independently, resulting in duplicated efforts, inconsistent standards, and missed opportunities for collective impact.



## **Digital Exploitation is Unregulated**

Technology is both a facilitator of trafficking and a missed opportunity for protection. Platforms lack accountability, and digital monitoring tools are underutilized.



# PROPOSED SOLUTIONS TO THE IDENTIFIED CHALLENGES

# **01.** Survivor-Led, Trauma-Informed Governance

Move beyond consultation and co-create policies with survivors through structured leadership roles, compensation, and ongoing capacity building.

# **02.** Labor Migration Policy Reform

Redesign visa systems to include full labor rights, independent oversight, access to justice, and union representation for migrant workers.

# **03.** Holistic Agricultural Reform

Pair child labor interventions with community-based income generation, living wages for adult workers, and accessible education.

## **04.** Collective Mapping and Collaboration

Facilitate collaboration across industries to create shared traceability tools, minimize duplication, and amplify civil society impact.

# **05.** Mandatory, Harmonized Due Diligence Legislation

Strengthen the EU CSDDD and Forced Labor Regulation with clear guidance, expert support, legal liability, and cross-sector accountability mechanisms, including remediation.

# 16 Tech Innovation for Ethical Oversight

Employ AI, open-source tools like grievance mechanisms and satellitebased farm traceability, to ensure accessibility and transparency for small producers.

# **OUTCOMES OF THE FORUM**

The 2025 Europe Regional Freedom from Slavery Forum was successfully organized as a collaboration between the private sector, civil society, and government actors, bringing together a diverse group of stakeholders and movement leaders and setting a precedent of successful cross-sector collaboration.

The Forum fostered open dialogue, strengthened alliances, and enhanced coordination across sectors. It served as a dynamic platform to exchange best practices, confront shared challenges, and align on strategic priorities to combat forced labor, human trafficking, and child labor. Many connections made at the Forum have already led to tangible collaborations. One such example is a new podcast series being developed by The Alternatives Factory, which emerged directly from connections built at the Forum.



# **ACTION STEPS**

### Launch a Thematic Webinar Series for Continued Learning and Engagement

Free the Slaves will organize a structured series of interactive webinars to continue unpacking key themes from the forum. Each session will bring together experts, survivors, businesses, CSO's leaders, and policymakers.

# Circulate a Questionnaire to Identify Opportunities for Collaboration and Overcoming Silos

We will circulate a questionnaire aimed at identifying interest and practical pathways to strengthen collaboration among participants. The questionnaire will explore:

- Interest in innovative mechanisms for communication and collaboration, such as shared social media groups, regular virtual check-ins, or thematic working groups;
- Willingness to co-create joint awareness campaigns and advocacy initiatives;
- And interest in forming grant consortia to apply for EU Funds and sharing other opportunities for collective funding strategies.

Once answers are collected, we will act accordingly.

#### **Organize the 2025 Global Forum in Paris**

The 2025 Global Forum will provide a key opportunity to continue these conversations and deepen cross-sector collaboration. It will serve as a platform to build new alliances, share progress, and co-develop practical solutions to end forced labor and child exploitation.



Participants responded very positively to the 2025 Europe Regional Freedom from Slavery Forum. Most attendees rated their overall satisfaction as high, with the majority giving it the top score. Nearly all respondents (12) indicated they would recommend the event to colleagues and expressed strong interest in attending future forums.

A recurring highlight was the forum's ability to foster meaningful connections across sectors. Participants emphasized the value of engaging with civil society, survivor leaders, academics, and government representatives in a shared space. Many reported forming new collaborations or identifying potential partners to advance joint efforts in combating forced labor, child labor, and human trafficking.

According to comments, participants found interesting and would like to delve deeper into effective multi-stakeholder cooperation, practical implementation of new EU regulation directives (CSDDD/EUFLR), use of technology in supply chain mapping, the impact of anti-migration policies, and why and how we can ensure survivor voices are central in shaping solutions.

While overall feedback on logistics and content was highly favorable, some participants suggested expanding the time allocated for interactive group discussions and informal exchanges. A few also noted that the agenda, though rich, could benefit from improved pacing to allow more reflection.

Several attendees praised the professionalism and support of the forum staff, describing them as helpful, responsive, and well-organized throughout the event.

The evaluation confirmed that the forum achieved its objectives and reinforced its value as a vital platform for dialogue, learning, and cross-sector alliance-building.



"I formed new connections that could turn into future partnerships and collaborations; also deepened connection with previous connections to discuss potential collaborations" - Anonymous



