Report on Human Trafficking Issues to the 2021 Winter Meeting of the OSCE Parliamentary Assembly

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by

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Mr. President, fellow parliamentarians, please accept the following report on my activities since the 2020 Winter Meeting as the Special Representative on Human Trafficking Issues for the OSCE PA.

High Level Meetings and Speaking Events

Human trafficking happens in each of our States, entrapping our own citizens as well as recent immigrants seeking a better life—not to mention those who were brought into our States specifically for the purpose of human trafficking. Our trafficking challenges are inextricably bound together through migration, tourism, trade, and supply chains. Preventing and solving these crimes requires cooperation across the region, and, increasingly, across the globe. Over the last year, I have taken every opportunity to raise human trafficking concerns and best practices with high-level officials. Although COVID-19 related restrictions have prevented in person meetings, I have been able to participate in several online events.

On July 21, 2020, I participated in the 2020 OSCE Alliance Against Trafficking Meeting, including a side event hosted by the OSCE/ODIHR and UN Women on the effects of the pandemic on anti-trafficking efforts. My focus was on the effects of the pandemic on trafficking of children and sexual exploitation of children online. Keeping children safe from sexual exploitation, pornography, and sexual predators and traffickers has always been for me a major concern. The event looked at the results and recommendations of a survey the two organizations conducted last spring on the effects of COVID-19 (more on that below), including the increased vulnerability of children, particularly as they have spent more time online during the pandemic.

I also participated in the July 29, 2020 virtual meeting "Voices Against Trafficking," which featured leading national and international human rights activists discussing different aspects of the current state of human trafficking. Speakers included former U.S. Secretary of Transportation Elaine L. Chao, Congressman Pete Olson (TX), Congressman Jim Costa (CA), Congresswoman Ann Wagner (MO), Congressman Greg Walden (OR), Congressman Chip Roy (TX), Congresswoman Debbie Lesko (R-AZ), Heather Fischer (Special Advisor for Human Trafficking Domestic Policy Counsel, Executive Office of The President), Senator Nancy de la Sierra (Mexico), Senator Manuel Anorve (Mexico), Bishop Marcelo Sanchez Sorondo (Vatican), Chief Jerry Garnett (ICE HIS), Santiago Nieto, PhD (Mexican Head of Financial Intelligence Unit), Eleanor Gaetan (Public Policy Director for the Nonpartisan National Center on Sexual Exploitation (NCOSE)), Andi Buerger, JD (Founder of Voices Against Trafficking), Charter Members of V.A.T, Nonprofits, Internet Safety Leaders, Law Enforcement Experts, and Survivors who are forging a new path for human rights.

Effects of the COVID-19 Pandemic on Anti-Trafficking Efforts

As we now know, the COVID-19 pandemic is having a serious impact on anti-trafficking efforts, on patterns of trafficking, on victims and on survivors. Traffickers are not shut down—they haven't gone on a holiday. Victims still need to be rescued. Survivors still need assistance. Vulnerable people have been made even more vulnerable by both the virus and its deleterious impact on the global economy. And when things start to open back up, traffickers may even have an easier time finding, deceiving, coercing and exploiting victims. I strongly believe we need to be seriously addressing:

- increased victim vulnerability—higher risk—especially for women and children,
- the situation of both current victims and survivors of trafficking,
- the heightened insecurity of victims in 2020 and beyond as government and philanthropic resources are diminished,
- ensuring a sustained and robust criminal justice response during and after the pandemic, and more.

I was pleased to participate as an expert last spring for the <u>survey</u> done by the OSCE Office for Democratic Institutions and Human Rights (ODIHR) and UN Women on the effects of the COVID-19 pandemic on anti-trafficking efforts. The survey was conducted among survivors of trafficking and frontline stakeholders, and a set of policy recommendations was developed based on the empirical data collected. According to the survey, the COVID-19 pandemic particularly exacerbated the vulnerability of women and girls to trafficking for the purposes of sexual exploitation. "Online recruitment, grooming and exploitation have been widely used by traffickers during the pandemic. There are also indications that trafficking for the purpose of sexual exploitation online, including the demand for Child Sexual Abuse Material (CSAM) has increased. The majority of anti-trafficking stakeholders and survivors of trafficking reported decreased accessibility of assistance and services for victims and survivors of trafficking."

The consequences of the COVID-19 pandemic are affecting and will continue to affect children worldwide due to the economic downturn, the negative impact on their health and development, the worsening of the learning crisis, and the effect on child safety. The COVID-19 pandemic is exacerbating vulnerabilities of children to THB due to school closures, increase in domestic violence and economic insecurity of households, as well as children's increased time online. Another risk to children relates to encountering child sexual abuse material (CSAM) online. As restrictions are lifted, children may be trafficked, forced out of school and into labour, bearing the burden of sustaining their families. According to the survey findings,

children who are victims of abuse, street children, stateless children, internally displaced or undocumented children and unaccompanied children are particularly vulnerable to THB. This is partly corroborated by the United Nations Sustainable Development Group Policy Brief on The Impact of COVID-19 on children, which reported on increased risks of sexual exploitation of children living in camps for refugees, migrants and internally displaced persons.

Additionally, remote working amid the coronavirus outbreak appears to have given abusers new ways to target people online to both generate demand and to groom vulnerable women and children. This is supported by the survey results, demonstrating that survivors are targeted during COVID-19 pandemic by traffickers mostly online.

The survey also found that "frontline organizations experienced significant challenges in their activities during the pandemic due to additional barriers in co-ordination and co-operation with governmental institutions and law enforcement agencies; lack of financial resources; difficulties in reaching vulnerable groups; and suspension or postponement of planned prevention and awareness raising activities."

According to data from Europol, the COVID-19 pandemic had the most significant impact on cybercrimes compared to other forms of criminal activities. PornHub, the largest pornography site in the world, which is under investigation for hosting videos of trafficking victims, children and rape, reportedly has provided free access to all its content during the COVID-19 outbreak worldwide, likely generating further demand for trafficking in women and children for the purpose of pornography production and other forms of trafficking for sexual exploitation online. There is evidence that some in the sex industry moved their operations online due to lockdown measures. Although the evidence is anecdotal, webcam sex trafficking also appears to be increasing. The shift towards the Internet is closely linked to additional privacy risks for the individuals concerned, making them more vulnerable to blackmail and further exploitation.

Moreover, there are reports of increased grooming and exploitation of children online through gaming sites and social media platforms by sexual predators during the emergency measures, as children have to stay home and the demand for pornography has risen. International and national law enforcement agencies, including EUROPOL and the FBI, are warning about the increasing risk of sexual exploitation on the internet and signs of child abuse or child trafficking. Available information indicates a growth of demand for CSAM and growth of CSAM and online exploitation, especially through the use of livestreams since the beginning of the COVID-19 pandemic. Technology companies using automated tools to detect child abuse content based on previously categorized material are struggling to identify new uncategorized data and are further constrained by the impact of the pandemic due to lack of capacity.

At the same time, distributors of CSAM are constantly developing sophisticated, cross-platform strategies in coded language to evade detection, and using popular platforms to attract audiences, diverting interested consumers to private channels for access to the material. In this regard, Australian authorities reported the identification of an online grooming manual shared by perpetrators. A number of European countries reported an increase in reports of online CSAM during the COVID-19 pandemic, as well as attempts to access illegal materials online. Other regions have also recorded an increase of these indicators.

In addition, Europol reported on conversations in online forums (including those in the Dark Web) on increased availability of children online during the COVID-19 pandemic due to isolation, unsupervised internet access, as well as more time for offenders to download and trade CSAM as many are teleworking or spending more time at home due to restriction of movement. According to the OSCE/ODIHR and UN Women survey, 10% of the survivor respondents who have children reported that during the COVID-19 pandemic, their child was targeted with offers of employment or solicitation of their images.

Based on the survey findings and research, ODIHR and UN Women have developed policy recommendations to address the trends and consequences of the pandemic on trafficking in persons covering the following areas: 1) strengthen the implementation of international legal frameworks; 2) develop effective implementation of National Referral Mechanism (NRMs) or equivalent systems to address the current trafficking related trends and consequences of the COVID-19 pandemic; 3) develop and/or update of National Strategies and National Action Plans (NAPs) to counter human trafficking to address trafficking trends and the consequences of the COVID-19 pandemic; 4) strengthen identification of victims of trafficking to address the trends and consequences of the COVID-19 pandemic; 5) make services to victims of trafficking and survivors of trafficking more accessible during and post pandemic; 6) provide access to remedies including justice and information; 7) address specific needs of women and girls; 8) address specific needs of children; 9) support and build capacity for both governmental and non-governmental frontline stakeholders; 10) strengthen efforts at THB prevention related to the pandemic; and 11) implement measures to reduce THB after the pandemic.

In addition, even before the pandemic, most children were unprepared for the psychological coercion or false promises used by traffickers to entice and enslave their victims. Children also may inadvertently make themselves vulnerable by engaging in high-risk behaviors online, such as lying about being older to access certain platforms, or sending explicit photos or videos of themselves, known as "sexting."

One way we can fight this and protect our children now – during this pandemic - is by education to keep them safe online. You can find a discussion of this in the Survey report and recommendation number 57, which deals with responding to the increase in online grooming and

exploitation by developing age-appropriate training tool for children, as well as for parents and educators.

This was also the topic of a resolution I authored that was adopted at the 2019 OSCE Parliamentary Assembly Annual Session in Luxembourg. It focused on educating students and teachers on how to identify and avoid human trafficking. In Luxembourg, I also held an event that discussed how NGOs, including the Frederick Douglass Family Initiatives, A21 Campaign, Just Ask, and others like the National Center for Missing and Exploited Children, have developed age-appropriate school courses to educate students on how to avoid trafficking traps, and how to educate teachers as well.

There already have been efforts to address these increasing vulnerabilities in the context of the pandemic. The U.S. Federal Bureau of Investigation, or FBI, issued a press release in late March warning parents to be more vigilant about the possibility of their children being targeted by sexual predators during the current pandemic. The NGO ECPAT has raised concern that, while sex tourism may be on hold during the shutdown of the travel industry, sexual predators are at home and online, seeking to groom children so that they can meet and abuse them in person when travel restrictions are lifted. ECPAT has made available a Youth Online Safety Guide, which I hope may be of use in OSCE countries.

In the United States, we have already been working on this. In January 2019, President Trump signed into law the Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act - a bill I proposed - authorizing \$430 million over four years for a comprehensive whole-of-government effort to fight sex and labor trafficking at home and abroad, which includes a component to ensure that children in the United States are educated in an age appropriate manner about how to avoid becoming victims of sex and labor trafficking.

This law honors the extraordinary legacy of one of the greatest Americans who ever lived, Frederick Douglass. He was born a slave in 1818, escaped slavery at the age of 20 and became a leader in the fight to abolish slavery and, later, to ending Jim Crow laws.

One other issue that the OSCE/ODIHR and UN Women survey report highlights is the need to strengthen our efforts to investigate and prosecute traffickers through financial transactions. And with the rise of online sexual abuse of children, we need to address how new technologies are being used in financial transactions - including cryptocurrencies - to hide traffickers' nefarious activities from the eyes of law enforcement. I had planned to introduce a resolution on this issue at the OSCE Parliamentary Assembly Annual Session in Vancouver. The resolution was to look at measures we could take to address this and to enable our law enforcement to better investigate—and prosecute—trafficking cases involving cryptocurrency

use. I will continue to work on this issue and introduce it in the Parliamentary Assembly when possible.

20th Anniversary of the TVPA

October 28, 2020 marked the 20th anniversary of the Trafficking Victims Protection Act (TVPA) of 2000—the comprehensive, historic law that I authored to aggressively combat sex and labor trafficking both within the United States and around the world.

The TVPA created a new, well-funded whole-of-government domestic and international strategy and established numerous new programs to protect victims, prosecute traffickers and to the extent possible, and prevent human trafficking in the first place. Thousands of human traffickers have been prosecuted and jailed pursuant to the TVPA, including all charges in 2019 against Jeffrey Epstein and the infamous sex trafficking ring convictions involving NXIVM's Keith Raniere and Smallville actress Allison Mack.

The TVPA included a number of "sea change" criminal code reforms including treating as a victim—and not a perpetrator of a crime—anyone exploited by a commercial sex act who had not attained the age of 18 and anyone older where there was an element of force, fraud or coercion. It radically reformed the U.S. criminal code to authorize asset confiscation and jail sentences of up to life imprisonment for the predators.

Among its many other provisions, the Trafficking Victims Protection Act also created the President's Interagency Task Force to Monitor and Combat Trafficking in Persons the U.S. State Department's Office to Monitor and Combat Trafficking in Persons and annual TIP reports with its tier grading of every nation's record in making "serious and sustained efforts" to eliminate human trafficking. Those relegated to what we call Tier 3—egregious violators—are subject to sanctions.

Over the years, I've authored four additional laws to combat human trafficking—including in 2003, 2005, 2016, and 2019. Also, based on the belief that federal law needed parallel state and local statutes to foster an effective prosecution strategy to combat human trafficking, the TVPA included new U.S. Department of Justice programs to assist in crafting state and local laws and authorized the creation of new anti-human trafficking task forces. The Act also included sheltering and a national hotline, and on the refugee side, created a new asylum category—the T visa—to protect victims and their families

In a like manner, the TVPA provides law reform and best-practice technical assistance to other countries.

Looking back, it seems we have come a long way on this issue. For most people at that time—including lawmakers—the term trafficking applied almost exclusively to drugs and weapons, not human beings. Reports of vulnerable persons—especially women and children—being reduced to commodities for sale were often met with surprise, incredulity or indifference.

Nevertheless, twenty years later, some of today's challenges, such as how ever-evolving technology is being utilized by predators to lure children into trafficking, could not have been anticipated then. And we could not have anticipated the current COVID-19 pandemic. But we can respond and work to ensure that we are prepared to address these new challenges now and in the future. We need to be more aware of how new technologies affect our efforts to combating human trafficking, and I welcome the work being done in this regard by the OSCE.

We, as lawmakers, also need to be aware of how new technologies are used in financial transactions which seek to hide activities from the eyes of law enforcement. We are witnessing the increasing use of cryptocurrencies – Bitcoin being perhaps the most famous, but there are others – in an effort by traffickers and their patrons to avoid detection.

I hope that, 20 years after both the TVPA and the OSCE's first Ministerial Council decision on combating trafficking, all of us will look at how our countries – and the OSCE – can be more effective in the fight against trafficking, particularly in areas involving new technologies.

Establishment of the OSCE/ODIHR International Survivors of Trafficking Advisory Council

I would like to applaud the establishment last month of the OSCE/ODIHR "International Survivors of Trafficking Advisory Council," or ISTAC, the first such council established by an international organization. ISTAC consists of 21 leading survivors of human trafficking from across the OSCE, and will assist with OSCE work in combatting trafficking in human beings.

I began working on combating human trafficking back in the 1990s after meeting and listening to survivors. Survivors are the real experts; their lived experiences and their perspectives can help inform our policies and make them more effective. We have had an advisory council similar to ISTAC in the United States for several years, and we have found it extremely valuable. I hope that the OSCE PA, the OSCE and the participating States will take full advantage of the expertise that this important new advisory council offers.

U.S. State Department Trafficking in Persons Report 2020: 20th Edition

The 2020 *Trafficking in Persons Report*¹ was released in June 25, 2020 by Secretary of State Michael Pompeo. Required by my *Trafficking Victims Protection Act of 2000*, this report is one of the most successful ways the U.S. promotes best practices and ensures accountability for the minimum standards to eliminate human trafficking. This annual report lays bare the record of 187 countries, including the United States, summarizing the country's progress in an annual tier ranking and in a narrative—with recommendations for progress.

Tier 1 countries fully meet the minimum standards for eliminating human trafficking. Tier 2 countries do not meet the minimum standards but are making a significant effort to do so. Tier 2 Watch List countries are in a grace period and in real danger of becoming Tier 3 unless they show significant effort to go along with their promises. Tier 3 countries do not meet the minimum standards and are not making significant effort to do so. Along with the embarrassment of being listed on Tier 3, Tier 3 countries are open to sanction by the U.S. government.

This year's report marks the 20th edition of the *Trafficking in Persons Report* and focuses on the evolution of the report itself over the past 20 years; it also notes the effect of the COVID-19 pandemic. The report notes that "since the TIP Report's inception, more than 120 countries have enacted anti-trafficking laws and many countries have taken other steps required to significantly raise their tier rankings—some citing the TIP Report as a key factor in their new anti-trafficking efforts."

I appeal to you as legislators to stay one step ahead of the traffickers, to adapt to new forms of trafficking, new technologies available to fight trafficking, and new cross-border collaboration. Please keep refining your State's trafficking laws and please use your oversight functions to ensure their full implementation. We must reverse these downward trends. Lives depend on it.

Participating States Making Measurable Progress: Hungary, Montenegro, and Uzbekistan

Three OSCE participating States made significant progress last year. Hungary moved up to Tier 2 for its efforts including "investigating more trafficking cases, including international investigations; prosecuting considerably more traffickers; sentencing all convicted traffickers to significant prison terms; and extraditing more suspected traffickers..... Additionally, the National Police appointed specialized trafficking investigators at each of its 19 county

¹ U.S. Department of State, *2020 Trafficking in Persons Report* (June 2020) https://www.state.gov/wp-content/uploads/2020/06/2020-TIP-Report-Complete-062420-FINAL.pdf.

headquarters, as well as in the Budapest office... Furthermore, the government amended legislation to include a non-punishment provision and a general protection measure for child trafficking victims and reported identifying more trafficking victims."²

Montenegro also moved up to Tier 2. It "increased prosecution and victim protection efforts.... investigated and prosecuted more suspects and convicted two traffickers under its trafficking law, the first convictions in five years, and imposed significant prison terms..... significantly increased the number of identified victims, mainly due to a notable case with 12 trafficking victims and 87 potential victims from Taiwan... eliminated the requirement for victims to cooperate with law enforcement in order to receive services, created a multi-disciplinary group to officially identify trafficking victims, and increased funding for victim protection."³

Finally, although it did not change its ranking, Uzbekistan continued to make progress and took "steps to address the use of forced adult labor during the annual cotton harvest through increasing remuneration to those picking cotton and improving working conditions to attract voluntary workers... ceased the systemic mobilization of students, teachers, and health care workers during the 2019 harvest.... continued to allow unimpeded access to international third-party monitors, who assessed a continued overall decrease in the number of Uzbek citizens forced to pick cotton and incorporated independent human rights activists into monitoring plans." "However... there were continued reports of corrupt officials requiring public sector employees to pick cotton or pay for a replacement worker, creating a penalty for not participating in the cotton harvest and a lucrative means of extortion for these officials."

Participating States Losing Ground in the Fight Against Trafficking: Armenia and Ireland.

The fight against trafficking in persons requires constant vigilance. Armenia was downgraded to the Tier 2 Watchlist because "the government had no convictions for the second year and has not had a forced labor conviction since 2014. The government identified eight victims, the fewest since 2012, and first responders continued to rely on victims to self-identify due to a lack of proactive identification efforts, such as standard indicators to screen vulnerable populations. Trafficking victims, like victims of other crimes, faced low access to justice, including an absence of victim-centered procedures and formal victim-witness protection measures."⁵

² https://www.state.gov/reports/2020-trafficking-in-persons-report/hungary/

³ https://www.state.gov/reports/2020-trafficking-in-persons-report/montenegro/

⁴ https://www.state.gov/reports/2020-trafficking-in-persons-report/uzbekistan/

⁵ https://www.state.gov/reports/2020-trafficking-in-persons-report/armenia/

Ireland was also downgraded to the Tier 2 Watchlist. "The government has not obtained a trafficking conviction since the law was amended in 2013, which weakened deterrence, contributed to impunity for traffickers, and undermined efforts to support victims to testify. The government continued to have systematic deficiencies in victim identification, referral, and assistance. The government continued to lack specialized accommodation and adequate services for victims, and the amended working scheme for sea fishers increased their vulnerability to trafficking."

Participating States Remaining on Tier 3: Belarus, the Russian Federation, and Turkmenistan

Three OSCE participating States have remained on Tier 3 for many years. Belarus continues to have "a government policy or government pattern of government-sponsored forced labor in public works projects and the agricultural sector... However, the government increased efforts to address trafficking, including convicting traffickers under its trafficking statute for the first time in eight years, increasing training for law enforcement, and confirming significantly more victims. The government continued to require the participation of factory workers, civil servants, and students in harvesting on state-owned farms or in street cleaning. University students were threatened with the loss of subsidized housing for non-participation."

Russia "took some steps to address trafficking, including by convicting some traffickers, facilitating the return of Russian children from Iraq and Syria, and identifying some victims, including foreign nationals. However, during the report period there was a government policy or pattern of forced labor; the total number of victims identified by the government remained negligible compared with the estimated scope of the issue; and authorities routinely penalized potential victims, including by detaining and deporting potential forced labor victims for immigration violations and prosecuting sex trafficking victims for prostitution offenses, without screening for signs of trafficking. ... The government did not screen laborers for trafficking indicators or identify any North Korean trafficking victims, despite credible reports that the DPRK operated work camps in Russia and subjected thousands of North Korean workers to forced labor. The government offered no funding or programs for trafficking victims' rehabilitation; authorities lacked a process for the identification of victims and their referral to care. The government did not consistently provide comprehensive information on prosecution efforts, but the limited available data and media reports suggest prosecutions remained low compared with the scope of Russia's trafficking problem. As in previous years, the government did not draft a national strategy or assign roles and responsibilities to government agencies."8

⁶ https://www.state.gov/reports/2020-trafficking-in-persons-report/ireland/

⁷ https://www.state.gov/reports/2020-trafficking-in-persons-report/belarus/

⁸ https://www.state.gov/reports/2020-trafficking-in-persons-report/russia/

Turkmenistan "took some steps to address trafficking, including approving the 2020-2022 national action plan, continuing to participate in anti-trafficking awareness campaigns, working with international organizations on combating trafficking in persons, providing training to its diplomatic corps on human trafficking, identifying potential trafficking victims at the international airport, and continuing to purchase machinery to mechanize cotton harvesting and planting. However...the government continued to direct policies that perpetuated the continued mobilization of adult citizens for forced labor in the annual cotton harvest and in public works projects. No officials were held accountable for their role or direct complicity in trafficking crimes and state surveillance practices continued to dissuade any monitoring of the harvest during the reporting period. The government did not report any information on prosecutions and convictions, identified no victims, did not implement legal provisions on victim protection, and did not fund any victim assistance programs."

Press Release to Mark World Day Against Trafficking in Persons

To mark the World Day Against Trafficking in Persons on July 30, 2020, I joined with the Albanian Chairmanship-in-Office of the OSCE and the ODIHR and released a <u>statement</u> highlighting the need to redouble efforts to combat human trafficking, particularly against the backdrop of the challenges posed by the COVID-19 pandemic and calling on OSCE participating States to intensify anti-trafficking efforts and partner with other countries and with civil society to protect victims, prosecute perpetrators and to prevent the crime from happening in the first place.

Role of Civil Society

OSCE participating States have long recognized the importance of capacity building and training for first line responders and those working in the travel industry to better identify child victims and provide them with appropriate protection and assistance, as well as the important role of civil society, including religious organizations, in combating human trafficking and assisting victims.

The COVID-19 pandemic has also had an effect on civil society and first responders, many of whom do so much to assist trafficking victims and survivors. Unfortunately, because of the pandemic, victims are less likely to be rescued. Victims may be quarantined with their traffickers, and, as a result of quarantine and social distancing practices, are now less likely to come into contact with people who might assist or rescue them.

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⁹ https://www.state.gov/reports/2020-trafficking-in-persons-report/turkmenistan/

NGOs and shelters are being impacted by the pandemic, as shelters must decrease the number of people they can house in accordance with government social distancing guidelines, and NGOs appear be facing significant losses in funding and staff who themselves are quarantined or sick. This can leave trafficking survivors more vulnerable than ever to being re-trafficked. We need to ensure these groups continue to have the funding and support they need to carry out this invaluable work.

Nevertheless, this year we have also seen examples of how grassroots anti-trafficking efforts have continued working collaboratively to help identify victims and educate our local citizens about the signs of human trafficking and the ways to get help.

In early January, I participated in the launch of a new website for the New Jersey Coalition Against Human Trafficking (NJCAHT). The coalition, organized by volunteers in my state, is working every day to help raise awareness of human trafficking. Their objective is to educate, empower and advocate.

Conclusion

This was not a normal year, as we all continue to struggle to overcome the COVID-19 virus and address its impact and repercussions. This is true for our anti-trafficking efforts as well. We must respond to these new challenges and ensure that our efforts are effective against these new trends and challenges. I urge you all to work within your parliaments to strengthen your legislation and policies to combat human trafficking. We also need international cooperation and coordination more than ever. Please join me in this effort until we have raised a generation that is free of human trafficking.