

INCREASING EXPLOITATION RISKS

Return Regulation | Trafficking Persons Further at Risk

La Strada International

The **World Refugee Day** should be a moment to remember why international solidarity with those escaping war, violence, or persecution is crucial for the world we live in. History has proved that any person, no matter the nationality, ethnicity, gender, or social class can become a refugee. Ignoring history and the promises of a Union based on human rights, this year the EU chose to shrink solidarity and close its doors even further.

The [political agreement](#) on the Return Regulation was reached on 1 June with the Council and [approved](#) by the EU Parliament last Wednesday (17 June) whilst right-wing MEPs chanted “send them back”. The regulation presents a real risk of increasing third-country national’s vulnerabilities and push irregularity. The [Common European System for Returns](#), most commonly known as the [Return Regulation](#), proposed back in March 2025, aims to reform and strengthen EU return rules, as a complement to the EU Pact on Migration and Asylum, which entered into force this month. Similar initiatives have been attempted in the past, but only the strengthened position of the far-right in both the European Parliament and Council made such an agreement possible.

According to Eurostat data, [64% of all identified victims of human trafficking in the EU are third-country nationals](#). As such, La Strada International is deeply concerned about the strong EU focus on the return of vulnerable migrant people, fearing that there will be even less focus on the protection and the prevention of exploitation and abuse, partly caused by the limited available safe and legal migration pathways.

Many organisations and European political groups are calling it [ICE-style](#) immigration policies, as it aims to achieve mass deportations, allow for violent raids, increase the risk of racial profiling, and permit the detention of children.

The regulation brings severe risks for trafficked and exploited persons. Identification of victims of human trafficking already lags behind and the regulation's emphasis on speedy assessments and quick returns, risks increasing non-identification and consequently deporting people before their victimhood and vulnerability is recognised, violating their right to protection and support. Beyond this, the introduction of the European Return Order, to facilitate mutual recognition of return decisions across the EU, bypassing individual assessment, means that an identified victim in one country may still be deported based on a decision taken elsewhere without knowledge of their vulnerability.

It also expands the possible countries to which third-country nationals can be sent against their will, even to countries they have no prior connection to. For trafficking victims, this is especially dangerous as transit countries are often the very places where exploitation occurred or where traffickers operate.

The emphasis on expanding detention and on the creation of return hubs in non-EU countries where people are held in precarious, overcrowded, legally uncertain environments, with language and information barriers, and with little to no oversight, profoundly increases their vulnerability to (re-)trafficking and exploitation by criminal networks that operate and recruit in those spaces. **This will leave people more (and not less) dependent on exploitative intermediaries.** Similar externalisation efforts in the past have proved costly, cruel, and counterproductive, resulting in thousands of refugees and other migrant people being exposed to violence, abuse, exploitation, and death.

Earlier, [16 UN Special Procedure mandate holders raised alarm](#), cautioning that the regulation would normalise punitive and disproportionate measures. Moreover, detention is often deeply retraumatizing and counterproductive to cooperation with law enforcement. Not only adults, but also families with children can be sent to return hubs, reversing an earlier protection that excluded minors. Only unaccompanied minors are excluded.

While the text references clear procedures, the right to appeal, support for vulnerable persons, safeguards for minors and families, and adherence to the principle of non-refoulement, the practical application of these provisions remains unclear considering the broader enforcement-first approach the regulation enshrines.

La Strada International has been joining other human rights organisations and institutions in raising concerns about the violations and risks the regulation could bring. Even relevant EU leaders, such as French President Emmanuel Macron and Spanish Prime Minister Pedro Sánchez have publicly spoke against the Return Regulation, strongly stating that this is "[Not our Europe](#)".

The regulation does leave some room for national governments to shape practical implementation. We call upon EU Member States to use it responsibly, to avoid detention as a default response, to prioritise a humane application of the provisions, and to invest in proper identification mechanisms for vulnerable people including trafficking victims, to ensure that enforcement never comes at the cost of the protections that international and EU law still guarantee.