

STATEMENT

A RIGHTS-BASED EU ANTI-TRAFFICKING STRATEGY

Key Demands for the EU Commission and Member States

La Strada International

Around EU Anti-Trafficking Day on 18 October, the European Commission is expected to present its **new Strategy on Combatting Trafficking in Human Beings**. As Brussels prepares for the summer recess, the drafting of the Strategy is likely approaching its final stages, and the choices made will determine whether the next EU Anti-Trafficking Strategy places victims' rights, prevention and accountability at its core.

Following consultations with Member States and civil society organisations, the European Commission [launched](#) a public consultation earlier to gather views on future priorities. Among the [93 submissions received](#) were contributions from NGOs, public authorities, labour inspectorates, trade unions, international organisations, independent monitoring bodies and academic experts.

We analysed all responses of the public consultation. The joint message emerging from these submissions is clear: **while the revised Anti-Trafficking Directive establishes important legal standards, the upcoming Strategy must go beyond minimum compliance and deliver an ambitious, rights-based framework for its implementation.**

A Strong Consensus Around Victims' Rights

Contrary to the perception that anti-trafficking debates remain divided, the consultation revealed broad convergence across stakeholder groups on many core priorities. The strongest support emerged for measures that strengthen victim identification, guarantee access to unconditional assistance and protection, improve prevention efforts, address labour exploitation and reinforce cooperation with civil society organisations. Importantly, support for these priorities did not come only from specialised anti-trafficking NGOs.

Many of the submissions most closely aligned with a rights-based approach came from international organisations and public authorities, next to trade unions, independent rapporteurs, victim support organisations and NGOs. This suggests a growing recognition across sectors that effective anti-trafficking policies require more than criminal law responses alone.

What the Strategy Should Deliver

The European Commission should seize this opportunity and ensure that the EU Anti-Trafficking Strategy 2026–2030 reflects these shared priorities and translates them into concrete commitments and measurable actions. In doing so, the Strategy should provide an ambitious, effective and rights-based framework to prevent human trafficking and protect those affected and address the conditions that enable exploitation.

We invite the Commission and Member States to:

- 1. Place victims' rights, needs, and agency at the centre of all anti-trafficking measures,** and ensure the full, effective, and rights-based implementation of the amended EU Anti-Trafficking Directive and other relevant international obligations, going beyond minimum compliance standards.
- 2. Ensure unconditional support for victims of trafficking,** recognising them as rights holders without prejudice or discrimination, and guaranteeing equal access to general and specialised services, protection and assistance regardless of race, sex, age, form of exploitation, country of origin, residence status or employment status, including through alternatives and complements to the criminal law response, such as social pathways, humanitarian residence permits, and access to international protection where appropriate.

3. **Enable victims to report crimes and access remedies without fear of prosecution or penalties for criminal or administrative offences committed under coercion and/or related to their residence status.** This requires the establishment of confidential and victim-centred reporting mechanisms, the early and effective application of the non-punishment provision, and safeguards against detention, deportation, secondary victimisation, intimidation and retaliation throughout criminal proceedings.
4. **Ensure sufficient awareness of, and training for, all relevant actors on all forms of human trafficking,** including trafficking for labour exploitation, the offence of knowingly using services provided by victims of trafficking, as well as the exploitation associated with surrogacy, forced marriage and illegal adoption. Such awareness-raising and capacity building should be based on evidence-based research and practical knowledge and seek to mitigate value-based and prejudicial biases.
5. **Strengthen awareness-raising and outreach among specific vulnerable groups,** particularly EU migrants and third-country nationals (TCNs), and take measures to reduce the overall vulnerability of migrants and refugees by promoting and protecting labour standards, in line with EU law and ILO conventions, in order to address the full continuum of labour exploitation and **guaranteeing access to labour rights and complaint mechanisms** for all workers, regardless of their migration status or the formality of their work and addressing risks of retaliation or negative repercussions including regarding their residence status.
6. **Strengthen liability for the private sector and legal persons** along supply and subcontracting chains, including through effective application of Articles 6 and 18a of the Anti-Trafficking Directive and other relevant legal instruments, such as the Forced Labour Product Ban Regulation and the Corporate Sustainability Due Diligence Directive (CSDDD), by introducing mandatory national due diligence, compliance monitoring and sanctions for labour law violations and serious misconduct – including abuses in subcontracting chains, posting arrangements and letterbox companies, particularly in high-risk sectors -, and ensure effective regulation of recruitment agencies and cross-border intermediaries with rights and remedies for affected workers.
7. **Promote effective access to rights by strengthening National Referral Mechanisms (NRMs) and focal points,** and by investing in sustainable, high-quality and long-term victim support systems. Involve NGOs in victim detection and identification, as well as in the design and implementation of NRMs and focal points and cross border referral cooperation, to enhance coordination and support.

8. **Extend legal aid and financial investigation measures** to support the execution of compensation orders, and ensure that seized assets and corporate fines are used to compensate victims, as recommended by EU law, as well as through advance payments and the establishment of compensation mechanisms, including effective compensation funds.
9. **Ensure adequate data collection, analysis, information sharing and monitoring** by improving national data recording on human trafficking, particularly in relation to under-researched forms of exploitation, in order to close knowledge gaps and assess the impact of anti-trafficking policies. This should include monitoring the effectiveness of victim support, including access to rights and justice, and supporting the work of independent rapporteurs in impact monitoring, with adequate recognition and resources. At the same time, protection of personal data and privacy must be a primary concern, embedded by design in all systems and practices of data collection, analysis and sharing.
10. **Ensure targeted funding** for National Referral Mechanisms (NRMs) including for safe accommodation and tailored support services provided by NGOs. Guarantee that grassroots organisations have full access to EU and national funding programmes, with adequate and sustained financial support.