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Trafficking for Sexual Exploitation

ABSTRACT

Current estimates of human trafficking for sexual exploitation underestimate rather than overestimate the volume. They exaggerate the role of trafficking in international prostitution of adults but underestimate trafficking in minors. About 60–80 percent of the crime is domestic, and the bulk of cross-border trafficking is regional. The major flows run from rural areas to cities and from economically depressed regions to affluent ones. Traffic to industrialized countries is 10–20 percent of the whole; most takes place within and between third-world countries. Prevention should concentrate on the main source countries and the most important junctions. This requires efficient police and intelligence cooperation both regionally and internationally. It is also crucial to harmonize national legislation.

International regulation of trafficking in persons is historically linked closely to the regulation of prostitution as a whole. The two phenomena are also linked closely in everyday life, so intertwined that it is difficult to study or discuss them separately. According to some statistics, between 70 and 90 percent of contemporary traffic in women and children in Europe and Asia is related to prostitution and other forms of sexual exploitation (mainly the pornography industry) (Hajdinjak 2002, p. 51; Omelaniuk 2002; “Trafficking in Persons Report” 2004, p. 23). The real percentages are probably lower because other forms of trafficking, especially those related to private housework, are less visible, and interest action groups and authorities are less interested (Ghijs 2004). However, there exists a general consensus that a majority of female victims of trafficking are trafficked for prostitution.

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The prevailing model of regulation of prostitution in Western countries distinguishes three legal frameworks: prohibition, legalization, and decriminalization. A system based on prohibition bans prostitution as a whole, whereas its modified form, abolition, allows the sale and purchase of sex while banning all other prostitution-related activities (e.g., exploitation of the prostitution of others). In a system based on legalization, prostitution is legal but subject to special legislation and close regulation through licensing, registration, and health checks. Prostitutes working outside the system are usually subject to criminal penalties. In a system based on decriminalization, prostitution and other forms of sex work are officially considered comparable to other lines of business and are subject to general regulation by civil employment law (West 2003, p. 533).

During the last 150 years, Western countries' policies toward prostitution have vacillated. During the first wave of increasing local and migratory prostitution from the 1840s to the 1890s, policies in Europe, North America, and their overseas colonies were mainly based on legalization. The focus was on public order and prevention of the spread of sexually transmitted diseases. The method to achieve these goals was the tightening up of the control of prostitutes.

After the emergence of the antitrafficking movement in the 1890s, prohibition began gradually to supersede legalization as the dominant model in both national and international (intra-European) policies. All the international treaties of the twentieth century regulating prostitution were based on an abolitionist ideology, which found its culmination in the 1949 Convention for the Suppression of Traffic in Persons and of the Exploitation of the Prostitution of Others. Abolitionist views have dominated U.N. policies and actions since then¹ and to a large extent dominate current international debates.

In Western countries, however, prohibitionist policies began to lose their grip in the second half of the century, especially since the 1960s, when decriminalization began to gain ground, first in policy debates and later in legislation. General changes in ideology and moral attitudes were important; so were the prostitutes' rights movement and the growth of sex worker collectives in North America, western Eu-

¹ Some scholars think, however, that the earlier abolitionist policies underwent a profound change during the 1990s: the focus in U.N. policies shifted from combating prostitution as a whole to combating organized crime-related prostitution and consequently to forced prostitution only (Niemi-Kiesiläinen 2004, p. 455).

rope, and Australia. The collectives' goals were the full decriminalization of prostitution and establishment of employment rights for prostitutes comparable to those in other businesses. The movement so far has failed to produce radical law reforms but has influenced legislation in many Western countries and contributed to more balanced prostitution discussions and policies. However, its influence on international legislation has been marginal (West 2003, pp. 533–45).

Regulation of prostitution is changing rapidly in Western countries, but the direction of change is not clear. Prostitution policies in Western countries have never been internally homogeneous and have usually included elements of more than one, often all, of the main legal frameworks. For example, in many countries with strict prohibitive or abolitionist legislation, prostitution (or at least some forms) has been *de facto* tolerated. This has led to a situation in which the legal status of prostitutes is vague at best, a situation conducive to corruption and arbitrary harassment. The general trend is to define the legal status of prostitution more clearly than before. However, measures to do this have been contradictory: control of some forms of prostitution (especially street prostitution) has tightened as control of others has been loosened. In Western countries, licensing, decriminalization, and re-criminalization are pursued simultaneously and with equal vigor, although usually by different interest groups (West 2003).

In the ideological context, prostitution is usually portrayed as a moral, gender, sexual equality, or human rights question. Niemi-Kiesiläinen (2004) sees three major ideological bases: the sexual moralist, the libertarian, and the feminist. None is internally coherent. Each is represented in prostitution debates and influences policy and practice. The extreme positions characterize prostitution as immoral or violative of gender or human rights (the view of many moral-majority groups, religious movements, and the feminist mainstream), or as one form of economic activity among others, with no special ethical or other connotations (the view, e.g., by the sex workers' rights movement).

Not only does this ideological chasm divide people at the ideological poles, but the sharpest divisions are found inside each, including the feminist movement. The feminist mainstream regards female prostitution as a form of slavery, an expression of structural inequalities of modern patriarchal society, and a form of exploitation of women. The distinction between free and forced prostitution is seen as a distraction

only. Prostitution can never result from free will, but is always a result of a lack of other forms of livelihood for women. From this perspective the idea of prostitution by free choice is absurd; the prostitute is always an object and a victim, never an individual acting of her own free will. Types of prostitution that are hard to fit into this frame, such as, for example, male prostitution, are usually ignored (West 2003, p. 539; Niemi-Kiesiläinen 2004, pp. 453–55; Jahic and Finckenauer 2005, pp. 33–34).

The other ideological pole in the feminist movement is the prostitutes' rights movement, which see prostitutes as independent actors making their own choices. It aims at the normalization of prostitution and at ending social stigmatization and exclusion. Problems concerning power relations in prostitution between employees, employers, and clients compared with other service industries, the diverse forms of prostitution, and conflicting interests of representatives of different types of prostitution are often underplayed (West 2003).

Between these two extremes fall a wide variety of opinions approaching prostitution on a pragmatic basis, as advocated by many groups and nongovernmental organizations (NGOs) engaged in work among prostitutes and victims of trafficking. The ideological differences are often explainable at least partly by the differences in how different groups and persons meet and see prostitution in their everyday lives (West 2003).

During the last 150 years, the most restrictive prostitution policies in Western countries have coincided with periods of rapid growth in the volume of international prostitution. These periods were characterized by an increase in all forms of migration, deepening inequalities in living standards between and within continents, and lax border controls.

The first wave of growth in international prostitution and related legislation extended from the 1840s to the First World War. The simultaneous growth of migratory prostitution and prostitution-related trafficking was caused by the industrial revolution and modern colonialism, which led to global growth in the demand for and supply of prostitution. According to Scully (2001, pp. 75–78), the growth in demand resulted from three developments: the large-scale deployment of African and Asian indentured labor to replace slaves in agriculture and in industry and large infrastructure construction projects in industrial countries and their colonies; mobilization and migration flows of non-

Western males within the Western colonies; and large-scale, long-distance movements of men from Europe and North America to colonies and frontiers. These developments were linked to deepening inequalities in living standards throughout the world (and within Europe between the fast-growing western part and stagnant eastern and southern peripheries) and the revolution in transportation, with railroads and steamboats making mass travel easier, faster, and cheaper. These developments generated an international traffic in sex workers and intensified local prostitution. The main flows were within and between colonies. However, in Europe and North America both migratory prostitution and related trafficking increased rapidly during the second half of the nineteenth century. Especially in Europe and the European colonies, these developments interacted with practically non-existent border controls (Scully 2001, p. 87).

After the First World War, border controls tightened substantially, especially in Europe and North America, which caused a significant decrease in international migratory prostitution. This period of decreasing numbers continued from the 1920s to the second half of the century. The decreasing trend did not change the basic policy lines in international legislation, but it began to affect national policies in Western countries after the Second World War, when decriminalization began to displace abolition as the main policy model. Prostitution and prostitution-related trafficking disappeared to a large extent from the public agenda (Scully 2001).

The second wave of international migratory prostitution began in Asia in the 1960s and in Europe in the 1970s and 1980s. In Asia the growth was connected with wars and large foreign armies in the area, especially the Vietnam War, which lasted from the early 1950s through the mid-1970s. Large prostitution industries emerged in several Southeast Asian countries to serve U.S. troops and military bases. After the Vietnam War, these industries were restructured to serve European, Australian, North American, and Japanese sex tourism, often with the consent and open support of local governments. In Europe, the volume of migratory prostitution began to grow in the western European big cities during the 1970s. At this phase the growth occurred mainly in immigrant sex workers from Africa, Latin America, and Southeast Asia.

The second wave of rapid increase in migratory prostitution in the last two decades was to a large extent the result of the collapse of the Soviet Union and its empire. Strict border controls that had prevented

free travel between western and eastern Europe disappeared almost overnight in the late 1980s, but the legacy of social misery and economic underdevelopment left behind by the decades-long Soviet occupation of eastern Europe has been much slower to disappear. An ideal situation for large-scale migrant prostitution inside Europe came into existence.

The current growth in migratory prostitution and related trafficking is also connected with rapidly increasing economic and social inequalities between industrialized and third-world countries (Scully 2001; Jahic and Finckenauer 2005, pp. 24–27). These developments have brought trafficking and prostitution into the international public debate and onto legislative agendas. Especially in the Western countries, they have produced a substantial tightening up of prostitution policies.

Prostitution and related trafficking have historically been closely linked to organized crime. Both are lucrative enterprises with relatively high profits and low risks. Many criminal activities, for example, drug trafficking and human smuggling, are easy to combine with them. For international drug trafficking networks, pandering is an alluring side business, in which profits equal those from the wholesale trade in mild drugs, but the risks are almost nonexistent. Trafficking, pandering, and retail sale of drugs complement one another well. Drug distribution can be concentrated on the premises where prostitutes work, and prostitutes can be used as dealers and couriers. At the same time prostitutes can effectively be brought under the control of pimps as accomplices and through drug abuse. All kinds of smuggling enterprises can easily be combined with trafficking in prostitutes (NCIS 2002, pp. 35, 38–39; see also Junninen 2005).

The link between prostitution, trafficking, and organized crime exists also in the prostitution debate today and is used as a rationale for both more liberal prostitution policies and tighter control measures. Advocates of liberal policies see decriminalization and licensing as a way to cut the links. If prostitution is given a legal status equal to that of other legitimate businesses, prostitutes' needs for services and protection provided by organized crime will disappear as will the potential of criminal groups to control and exploit prostitutes.

Those pursuing more prohibitive policies see the links as justification for total abolition. Prostitution is seen as integral to activities and financing of organized crime and as corrupting society and creating a favorable ground for the spread of all forms of vice and criminality and

for general social disintegration. In Europe, during the last decade, the debate has especially concerned the growth of eastern European migrant prostitution in western Europe and its role in the infiltration of eastern European criminal groups into western markets. The real and alleged connections between these phenomena have been used by the authorities and community action groups to justify more prohibitive policies and legislation (e.g., in the United Kingdom and the Nordic countries).

Prostitution, trafficking, and organized crime are also linked in current international agreements. While the roots of the international regulation of prostitution-related trafficking lie in the treaties created for the regulation and combating of prostitution as a whole, the focus in the United Nations 2000 Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children (the Palermo Protocol) has shifted to the combat and prevention of organized crime. According to Niemi-Kiesiläinen (2004, p. 455), this mirrors not only the central roles that prostitution and prostitution-related trafficking have acquired in the international control of organized crime, but also a more general change in U.N. prostitution policies during the nineties, a shift from an aim of total abolition to one of prohibition only of forced prostitution.

Public health had a central role in the prostitution policies and licensing systems of the nineteenth and early twentieth centuries. Most systems required regular medical examinations for licensed prostitutes, the objective being to prevent the spread of syphilis and other sexually transmitted diseases. This became less important after the Second World War, when antibiotics and other drugs made treatment of venereal diseases easier, cheaper, and more effective, a medical revolution that influenced the moral revolution in Western countries and the liberalization of prostitution policies in the second half of the century.

However, the 1980s and HIV/AIDS brought prostitution again back onto the public health agenda. The impact of HIV/AIDS on prostitution, the prostitution debate, and prostitution policies has been manifold, but the general tendency has been a strengthening of prohibitionist and abolitionist attitudes, and a shift away from civil rights and prostitutes' rights toward control and regulation (if not recriminalization). This shift has been partly a direct consequence of concerns about the spread of HIV/AIDS for both public and prostitutes' health, but HIV/AIDS has also provided a suitable front for more generally mo-

tivated abolitionist policies (Scully 2001, pp. 75–83; McKeganey and Barnard 2003, pp. 573–85).

All in all, two major changes have taken place in international prostitution during the last two decades. First, the volume of migrant cross-border prostitution (and related trafficking) has increased rapidly. In Europe this increase has been a consequence of the increase in the demand for prostitution and other sexual services in western Europe and the economic and social problems in the former socialist countries in eastern Europe that created a source area from which migrant prostitution and prostitution-related trafficking can travel far more easily and more economically than from Southeast Asia, West Africa, and Latin America. In Southeast Asia and some parts of Latin America, an important factor has been growing Western sex tourism, but there are also several other contributing factors. Growth in the volume of prostitution and the increase in the number of foreign prostitutes have made prostitution more visible in many countries and increased prostitution-related disturbances.

The increase in international prostitution has yielded increasing revenues for international organized crime and has contributed to the infiltration of eastern European and other criminal groups into western markets. Prostitution thus has increasingly been brought into the focus of law enforcement authorities (*Organized Crime Situation Report* 2001, p. 41; Hajdinjak 2002, p. 51).

The emergence of HIV/AIDS as an incurable sexually transmitted, serious disease since the 1980s has meant that prostitution has increasingly (again) become a major public health concern. Both of these developments, the increase in the volume of international prostitution and the emergence of HIV/AIDS, have strengthened abolitionist and moralist tendencies in international prostitution debates and policies and tightened control of prostitution in many countries.

The general trend in Western legislation seems to be to define the legal status of prostitution more precisely. The result has been a mix of legalization, decriminalization, and recriminalization. In Europe, the most liberal policies have been pursued in the Netherlands and Germany. In Germany, the new prostitution law of 2002 legalized both prostitution and brothels and gave prostitutes the legal status and social benefits of other service sector employees. It also recognized the prostitute's right to compensation for her or his sexual services if agreed

on beforehand. The compensation cannot, however, be transferred to another person, a restriction aimed at preventing pandering.

In the Netherlands, brothels have been legal since 2000. The legal status of prostitutes as employees is the same as that of other service sector workers. In both countries attempts are also being made to protect prostitutes' independence and working conditions with extensive criminalization covering, among other things, prostitution-related trafficking, buying sexual services from minors, and profiting from forced or underage prostitution (West 2003, pp. 533–45).

In the Scandinavian countries (except Sweden), in the United Kingdom, in many southern European countries, and in the former socialist countries, prostitution (both selling and buying) is decriminalized, but the civil and labor law status of prostitutes has been left undefined and is thus much weaker than in Germany or the Netherlands. Pandering and all forms of promoting prostitution of others are usually criminalized. In some countries, for example, in Scandinavia and the United Kingdom, there has been a strong recent tendency to tighten prostitution policies. Street prostitution and some other forms of prostitution in public places have been recriminalized, and control measures against foreigners engaged in prostitution have been tightened (Lehti and Aromaa 2002, pp. 10–16; West 2003, pp. 533–45).

The new trend to recriminalize prostitution has manifested itself in the last few years most strongly in Sweden, where, since 1999, all purchase of sexual services has been criminalized. Pandering and other forms of profiting from prostitution of others were criminalized earlier. The selling of sexual services remains legal, but the legal status of prostitutes is undefined and vague. Recent Swedish prostitution policies have been guided by mainstream feminist ideology, which regards prostitution as an expression of structural inequality between genders and all women engaged in prostitution as victims of a patriarchal society. Against this background, a situation in which buying sex is criminalized but selling it is legal is not seen as a problem. The Swedish policies basically return to the roots of the abolitionist policies of the beginning of the twentieth century. The idea that women engaged in prostitution are passive victims with no choices and no will is not a new one, but had a strong influence on the international antiprostitution treaty system created between 1904 and 1949 (Scully 2001; Lehti and Aromaa 2002, pp. 10–16).

In this essay we discuss current international approaches to regula-

tion of trafficking for prostitution and other sexual exploitation. Trafficking for prostitution and other forms of sexual exploitation (trafficking in women)² dominates current trafficking discussions and policy planning, especially in Western countries. Hard data and scientific research remain scarce, although the situation is improving. This essay analyzes and synthesizes existing data. We begin in Section I by assessing the existing information sources. In Section II we discuss basic characteristics of the crime, its victims, and its organizers. Section III deals with the development of the concept of trafficking in women in international legislation, discussion, and research; Section IV with the crime's volume and geography; and Section V with prevention and control. Section VI synthesizes the findings and proposes steps that need to be taken if we are to know more about human trafficking for sexual exploitation and how it can better be prevented and controlled.

I. Information Sources

The major problem in studying and combating trafficking in persons is the scarcity, unreliability, and noncomparability of existing national and international data. Accurate information on the volume of the crime does not exist. Some major reasons are the absence of comparable statistics on reported crimes, indictments, court cases, and victims; the diverse ways the crime of trafficking in women is criminalized in the legislation of nation-states; the characteristics of trafficking (as organized—in part, transnational—crime), which result in a high level of uncounted crimes (i.e., because such crime is not readily reported to the police) and make trafficking hard to identify, control, and prevent; the weak legal status of victims in most countries, which contributes to their reluctance to report crimes or to cooperate with investigations and court proceedings; and the inconsistent uses of the concept of trafficking in women and persons in international and national contexts.

The main sources of quantitative data are statistics kept by national governments and criminal justice and immigration authorities on reported crimes, indicted offenders, and irregular migrants; statistics kept

² The terms *trafficking in women* and *prostitution-related trafficking* are used in this essay as synonyms for trafficking for sexual exploitation regardless of the sex and age of the victims; *traffic in women* refers to trafficking in female victims and *traffic in children* to trafficking in minors.

by NGOs and associations assisting victims of trafficking and prostitutes; statistics kept by various international and regional organizations, for example, the International Organization for Migration (IOM), the International Police Organization (Interpol), and the United Nations on crime and migration trends; and information available from surveys and publications produced by national and international research projects.

The most extensive global database is that of the U.N. Global Program against Trafficking in Human Beings (GPAT) comprising 161 countries and special administrative territories. It includes data on trafficking flows between 1996 and 2003 and is based on 473 reports and statistics from 190 international and national institutions. However, the database has important limitations. The quality of the data is no better than that of the original sources, which is highly variable, and North American and western European organizations are vastly overrepresented among the source institutions, which distorts regional comparability. The database does not provide global or regional estimates of the annual numbers of trafficking victims, but the country profiles are publicly available on the Internet and comprise assessments of the intensity of the crime and information on the countries of origin of the victims, together with short victim profiles (GPAT 2005; see also www.unodc.org/unodc/en/trafficking_human_beings.html). Despite improvements in recent years, national statistics are highly unsatisfactory even inside the European Union, and also on the international level. Very little is known about numbers of irregular migrants or migrating prostitutes who may have used the services of traffickers or about numbers of individuals working for criminal groups involved in trafficking. The problem becomes worse concerning statistics on numbers and characteristics of various categories of trafficked persons (Mon-Eu-Traf II 2004).

According to a study conducted by the IOM in Europe in 1998, the main sources of data were statistics from police, border guard, and migration authorities. The situation has changed little in the last seven years. According to a second Mon-Eu-Traf study conducted in 2004, information on trafficking in the E.U. member countries is mainly found in general crime statistics or in general migration statistics and is usually scattered in several different (often noncomparable) national databases. Of the twenty-five surveyed countries, eighteen had no data on traffic in children, thirteen none on trafficking in women, and

eleven none on trafficking in general. Only eleven countries had statistics on the number of convictions for trafficking (IOM 1998). In several countries the existing databases are at least partly confidential, and their information cannot be used for other than investigative purposes (Mon-Eu-Traf II 2004). Because the databases are created to meet administrative needs of criminal justice and immigration authorities, and not for criminological or trafficking research, the data are usually overly general. The same data forms are used for every offense, which means that crime-specific data are seldom collected. The other major shortcoming is that the main focus is on offenses and offenders; information on victims is rarely collected. However, the numbers and characteristics of victims are crucial not only for understanding trends in trafficking but also for producing reliable estimates of the total number of trafficked persons and for hindering the trafficking process. These data are practically nonexistent (IOM 1998; Mon-Eu-Traf II 2004).

Systematized databases kept by NGOs are rare. In many countries (e.g., Finland, Italy, the Netherlands, Spain), NGOs possess significant information, but the challenge is to make this information available for research and to coordinate it with data from other sources. If this could be done, the result would be more and better information on numbers, characteristics, and needs of victims.

NGOs could provide highly detailed qualitative information on victims but also quantitative data on the number of trafficked women who come into contact with NGOs each year, the ratio between trafficked women and foreign prostitutes, and the number of trafficked women granted stay permits under social protection programs. This knowledge should be preserved, and data should be gathered by NGOs, on the basis of common standards, and disseminated for research and policy purposes. Current data collection and storage systems of most NGOs in Europe are unsatisfactory. Outside Europe the problems are identical: differing definitions; noncomparable, poor, and scattered data sources; and many estimates whose origins are obscure (Mon-Eu-Traf II 2004).

Grave problems also characterize the available qualitative data. The most detailed information on the characteristics of trafficked persons is to be found in IOM and U.N. Interregional Crime and Justice Institute (UNICRI) surveys on the situation in the former socialist countries and in some African and Asian countries (IOM 2000–2004; *Traf-*

ficking of Nigerian Girls to Italy 2004; Travnickova 2004), as well as in the two Mon-Eu-Traf studies (2002, 2004), the later of which comprises most of the old E.U. member countries.³ However, even at its best this information is based on a relatively small number of cases and victims and covers only short periods. Some authors have criticized the studies for the uncritical way many treat their sources. The narratives of interviewed victims are usually accepted at face value, and their stories and claims are not validated in any way (Legget 2004, p. 3). Most focus on the former socialist countries. It is not self-evident that information and research concerning these countries can be generalized to the world as a whole. However, despite their shortcomings, the IOM and UNICRI studies are the most reliable current overviews available.

Another source widely used is the annual "Trafficking in Persons Report" of the U.S. State Department. It is put together using local contacts and sources in each country, and data are thus of uneven quality. The report estimates global, regional, and national numbers and assessments of the crime prevention activities of nation-state governments. It is published annually and can also be found on the Internet (www.state.gov/g/tip/rls/tiprpt).

As long as information is scarce, unreliable, and noncomparable, it will be difficult to develop effective and efficient counterstrategies, even regionally, much less internationally. The current emphasis in the fight against organized crime is on reducing legal and illegal opportunities for criminal activities. This will require knowledge of how illegal activities develop. In the case of trafficking in persons, this requires accessible, up-to-date, comparable qualitative information on recruitment, transportation, exploitation, organizations, clients, and victims (Mon-Eu-Traf II 2004).

The Netherlands has adopted a data collection model that could be used with minor adjustments as a basis for a comparable inter-Euro-

³ The reports of IOM and UNICRI are based on surveys of former victims (contacted by NGOs or government officials), traffickers, and police and migration officers. The two Mon-Eu-Traf studies were carried out by TRANSCRIME (Italy), the Finnish National Research Institute of Legal Policy, and the European Institute for Crime Prevention and Control, affiliated with the United Nations (HEUNI) (Finland) and the Research Centre on Criminology at the University of Castilla-La Mancha (Spain) under the E.U. 2002 Stop II Programme in 2001–4 in the old E.U. member countries. The aim was to create standardized research methods for trafficking in women and use them to collect information on criminal legislation, on the availability and adequacy of existing statistical data, and on quantitative and qualitative indicators of the crime situation in the studied countries.

pean and international database. An official confidential database called the central registration of victims of trafficking is kept by the Foundation against Trafficking in Women (STV), an NGO. Police must report every victim they encounter to the STV, which maintains a computerized database on the gender, age, country of origin, language, children, traveling documents, place of residence, form of prostitution, age of recruitment, number of promises, amount of legal assistance, and number of asylum requests and grants of the victims. Also recorded are a request for financial compensation if the victim is in the Netherlands and, if not, the reason for return and return assistance. These and other data are reported in annual reports of the Dutch National Rapporteur on Trafficking in Human Beings (Mon-Eu-Traf II 2004; see also www.fo-stvkennisnet.nl/kr_fo; Dutch National Rapporteur 2004).

II. Characteristics of Trafficking, Traffickers, and Victims

In this section we discuss the main characteristics of victims and organizers and the *modi operandi* of the crime. The data discussed derive mainly from information on Europe and from IOM and UNICRI reports on selected African and Asian countries.

A. Types of Trafficking

Trafficking for sexual exploitation dominates the Western trafficking discussion. The reason is partly that information is even scarcer and concepts more confused concerning other forms of trafficking in persons. The sex industry, however, is more visible than other forms of exploitation (domestic servitude, sweatshop industries, etc.) and arouses stronger moral responses. The sex industry is also economically less important and thus has fewer and less powerful interest groups to defend its interests (IOM 2004, p. 12).

This does not mean that trafficking for sexual exploitation is not a major problem. According to some estimates, as many as 70–90 percent of the traffic in women and children in Europe and Asia, and a substantial percentage in other regions, serves organized prostitution and other forms of sex business (Omelaniuk 2002). Concerning the traffic in adult men, sexual exploitation has only a marginal role. As most of the total volume of global trafficking involves men, sexual exploita-

tion-related trafficking makes up less than half the volume of global trafficking in persons (see Sec. IV).

Estimates of the volume of trafficking for economic exploitation in Europe are scarce, but it appears that traffic of workers for the underground economy mainly involves men and serves mostly agriculture, the construction industry, and other related business sectors that employ unskilled workers and experience a high turnover of labor. The destination for laborers in Europe is the old E.U. member countries. Women are trafficked into western Europe mainly to work as domestic servants and nannies. The main source areas for economic exploitation-related trafficking in Europe are the Balkans and eastern Europe, but workers are also smuggled from North Africa and East and South Asia (Ehrenreich and Hochschild 2003).

North America and the Persian Gulf are other main destinations for trafficking for economic exploitation. In both areas, the volume of trafficking related to economic exploitation is estimated to be larger than the volume of trafficking for sexual exploitation. Traffic in children and adults for economic exploitation is also rampant in Latin America, Africa, and Asia. The question of when terms of employment and working conditions meet the criteria of trafficking in persons is not clear or easy to answer. Terms and conditions as a rule are considerably worse than in the legal labor market, and various abusive practices are general. The workers (in the case of adults), however, usually know this when they are recruited and voluntarily contract with the traffickers. Drawing a line between economic and sexual exploitation also is often difficult, because many women and children who are trafficked for work as domestic servants are also exploited sexually (Plant 2002; www.globalmarch.org).

Evidence of trafficking associated with the international trade in human organs is almost nonexistent in Europe, and evidence from other continents is scarce. Adult victims in this trade seem to be fairly rare (www.globalmarch.org; see, however, Travaini et al. 2003).

B. Victims

There appear to be substantial differences between different forms of trafficking and between different source and destination countries. In Belgium, according to Vermeulen and van der Beken (2004), trafficked women are on average younger than those smuggled as illegal immigrants, although in both categories most are under thirty (about

90 percent of those trafficked and two-thirds of those smuggled). Women trafficked for sexual exploitation are on average younger than those trafficked for labor exploitation.⁴

The situation in other European countries seems to be similar. Most of those trafficked for prostitution are between eighteen and twenty-five years of age and are on average younger than those exploited as domestic servants or in sweatshops (Travnickova 2004). The age structure of domestic prostitution and of independent migrant prostitution is usually older than that of forced prostitution. For example, in Finland, over 60 percent of Russian migrant prostitutes are over twenty-five, whereas in Italy the bulk of Russian women forced into prostitution are under twenty-five years (Lehti and Aromaa 2002, pp. 52–55; Leskinen 2003, pp. 13–14; Bopp and Cauduro 2004).⁵ Young girls are easier to recruit, control, and resell than older women and thus are preferred by traffickers. They usually also have fewer possibilities, connections, and resources for seeking employment independently abroad and for this reason easily fall prey to the traffickers (Mon-Eu-Traf II 2004).

Data on the proportion of minors among victims are scattered, but the percentage appears to vary considerably between regions. Two recent studies concerning the Balkans estimate that minors make up 10–30 percent of the victims of prostitution-related trafficking from the area. Most are fifteen- to seventeen-year-old girls, but some younger children are also involved (Hajdinjak 2002, p. 51; Omelaniuk 2002). A survey based on twenty-nine victims trafficked to Europe from the Edo State in southwestern Nigeria gave the percentage of minors as 15 percent; none of the interviewed victims was under fifteen at the time of recruitment (*Trafficking of Nigerian Girls to Italy* 2004, p. 62). The percentage of minors is probably considerably lower in Europe, North America, and other industrialized countries than in other regions (because of harsher criminalization, higher standards of living, compulsory school attendance, and effective social security systems). In South and Southeast Asia and in some regions of Latin America,

⁴ In the studied group, 72 percent of those trafficked for prostitution were under twenty-five years of age; among those trafficked for other reasons the corresponding percentage was 61 percent (Vermeulen and van der Beken 2004).

⁵ The same difference exists in other forms of trafficking. In Belgium, Ecuadorian girls trafficked as nannies and domestic servants are usually young, between eighteen and twenty-five, whereas the (illegal) migrant women employed in the same markets are on average older, many in their thirties or forties (Ghijs 2004).

the majority of victims of prostitution-related trafficking are assumed to be minors (Muhonen 2005; www.globalmarch.org).

The family backgrounds of women trafficked for sexual exploitation in western Europe differ substantially from those of other trafficking victims. In Belgium, only about 10 percent of those trafficked for prostitution are married or have lived with a partner in their native country; the corresponding percentage for victims of other forms of trafficking is about 30 percent and for illegal migrants over 50 percent (Vermeulen and van der Beken 2004). This difference in family status is not explainable by differing age structures only. The victims of prostitution-related trafficking in Europe and the former Soviet Union typically come from worse economic circumstances than victims of other types of trafficking, and a large number are single mothers. According to the IOM, almost 90 percent of victims of prostitution-related trafficking in Tajikistan have at least one child, and almost 80 percent are unmarried, divorced, or widowed. The corresponding figures for Moldovan victims are 45 percent and 85 percent (IOM 2001a, 2003a).

The situation in West Africa is different. According to a UNICRI survey of Nigerian women trafficked to Europe, practically all are single and fewer than 10 percent have children. However, most of the Nigerian victims are the eldest or next-eldest daughters in their families and (like eastern European victims) typically not only support themselves but also have economic responsibility for supporting their near relatives (IOM 2003a; *Trafficking of Nigerian Girls to Italy* 2004). A disproportionately high percentage of victims of sexual exploitation also come from broken or abusive family relations: of the victims in the Netherlands, about 40 percent have grown up without a father; of those with a father, more than half had a nonexistent, poor, or shallow relationship with him (Dutch National Rapporteur 2004). Of the Moldovan victims in Bosnia, over 80 percent have been subjected to domestic violence in their home country. Two-thirds of Nigerians trafficked to Europe come from polygamous families.⁶ In fact, according to a Bosnian study, dysfunctional family relations (usually caused by alcoholism, drug abuse, and physical and sexual abuse) are the most

⁶ It should be noted, however, that no data are available on the prevalence of polygamy in their home regions. Thus it is not known if the high percentage reflects only the general rate of polygamy in those regions or if the offspring of polygamous families are overrepresented among victims (as the study mentioned suggests).

significant factor explaining victimization (*Trafficking of Nigerian Girls to Italy* 2004; Maljevic 2005).

The bulk of victims of trafficking usually come from the most economically depressed and politically most unstable areas in the world and from the most disadvantaged social and ethnic groups in those areas. Information from the European countries shows, however, that there are major differences in social and educational backgrounds of victims from different recruitment areas.

Victims trafficked for sexual exploitation into Europe from Africa, Latin America, and South and Southeast Asia come almost without exception from low or very low social classes, usually from the countryside, and have elementary educations at best (e.g., of Nigerian women trafficked to Italy, more than 95 percent have only basic education at the highest [*Trafficking of Nigerian Girls to Italy* 2004]). This partly reflects the overall social and educational situation in these countries, especially for the rural female population.

The backgrounds of victims from eastern Europe, however, are substantially different. Data from Austria, Finland, Italy, the Netherlands, and Portugal show that the educational and professional backgrounds of victims of trafficking, and migrant prostitutes, from Russia and the central European countries are heterogeneous and that the number of middle-class women with university degrees is substantial (Mon-Eu-Traf II 2004). In Austria, about a third of eastern European victims of trafficking who take refuge with the NGOs have university degrees or are university students (Kaufmann and Zwettler 2004). In Finland, the corresponding percentage among Russian migrant prostitutes in Helsinki is about 40 percent (Hollmen and Jyrkinen 1999, p. 41). It is probable that women with higher education are overrepresented among those fleeing exploitative situations and contacting the NGOs, but the figures indicate that the educational backgrounds of the eastern European victims are not only substantially different from those of third-world victims but also substantially higher than the average of the population in their native countries. There is, however, a considerable number of women with very poor social and educational backgrounds among the eastern European victims, too, especially among those from the Balkan countries (Mon-Eu-Traf II 2004). In the Netherlands, at the time of recruitment, the average standard of living of nearly three-quarters of all victims of prostitution-related trafficking,

regardless of ethnic background, was very low (Dutch National Rapporteur 2004).

Information on the number of professional prostitutes among victims of trafficking in Europe is inconsistent. In Russia, many local researchers and authorities believe that most women trafficked for prostitution abroad are recruited from among persons already engaged in prostitution in their home countries (Kleimenov and Shamkov 2004, p. 40). In Estonia and the other Baltic countries, authorities estimate that the number of professional prostitutes among women emigrating abroad for prostitution is very high. The Finnish police authorities estimate that almost all Russian and Estonian migrant prostitutes operating in their country have also engaged in professional prostitution in their native countries (Leskinen 2003, pp. 12–16).

There is, however, very little information on how and why these women were recruited into prostitution in the first place. That they are engaged in prostitution in their native countries before emigrating or that they engage in prostitution simultaneously in their own country and in its neighboring countries may say more about how prostitution is organized and operated than about the backgrounds of those who engage in it. Research among Russian prostitutes in Finland shows that the majority have been engaged in prostitution only for a short time (55 percent less than two years). Only a third have been prostitutes for five years or longer (Hollmen and Jyrkinen 1999, p. 41). The Finnish figures do not refer to trafficked women but to migrant prostitutes, and it is probable that among women *trafficked* for prostitution from Russia, the percentage of those previously engaged in prostitution (especially professionally) would be substantially lower. According to data on victims of trafficking in the Netherlands (regardless of ethnic background), only about 20 percent have been engaged in prostitution at the time of their recruitment (Dutch National Rapporteur 2004). A study of the victims trafficked from and through the Czech Republic gives an identical picture: one-fifth have earned their livings as prostitutes at the time of recruitment (Travnickova 2004, p. 83).⁷ The situation is probably more or less similar throughout Europe. The European data refer to adult victims. Where the bulk of victims are minors, the percentage is certainly even smaller (*Trafficking of Nigerian Girls to Italy* 2004; Muhonen 2005).

⁷ The study was based on data concerning thirty-nine victims in crimes reported to the Czech police.

According to data from the Netherlands, only about 60 percent of victims of prostitution-related trafficking had a job at the time of their recruitment; of those, a third were prostitutes, and the others worked mainly in the hotel and catering industry, in factories, or in the entertainment industry. A survey of Nigerian victims trafficked to Italy gives a fairly similar picture: only about half had a job when recruited. Most were engaged in small-scale subsistence trading or were hairdressers. Thus a very large percentage of victims (at least in Europe and West Africa) were unemployed, and many had no earlier working experience. The bulk of those with a job worked in prostitution or in the kinds of industries (hotel, catering, or entertainment) in which the use of international and illegal labor is common and that are often used as fronts for organized prostitution (Dutch National Rapporteur 2004; *Trafficking of Nigerian Girls to Italy* 2004, p. 63).

Victims' reasons to accept recruiters' offers are fairly similar regardless of the type of trafficking. Both women trafficked for prostitution and women trafficked for economic exploitation are moved mainly by economic motives (e.g., 93 percent of the surveyed victims in Bosnia). There seem to be significant differences between the promises made to those trafficked for prostitution and to those trafficked for economic exploitation: the victims of prostitution-related trafficking have usually agreed on a much vaguer basis (Maljevic 2005). Half of victims of economic exploitation in Belgium received a promise of a specific job. For victims of sexual exploitation, only one-fourth did (Vermeulen and van der Beken 2004). For both groups, most of those promised a specific job were promised work in the hotel and catering industry (according to the Netherlands data, a large proportion before their recruitment worked in these industries).

Considering the publicity that trafficking has recently received in many source countries, it could be asked how victims can be so naive that they believe traffickers' promises (especially when the promises usually seem to be vague). One explanation is that recruiting is increasingly done through acquaintances, relatives, and others who have the victim's trust. Despite this, many victims have serious doubts about the reliability of the promises, but their domestic situations make the risk seem worth taking. According to Nigerian data, as many as 80–90 percent of repatriated victims of prostitution-related trafficking admit that they knew when recruited that they might end up as prostitutes. However, they had little choice other than to accept, since they could

not find employment and lacked funds to continue their educations at home (*Trafficking of Nigerian Girls to Italy* 2004, p. 73).

The number of those in Europe who have other than economic motives or who have been abducted is small. In Belgium, 8 percent of victims say that they were mainly looking for adventure, and 7 percent say they were kidnapped. In the Netherlands, the percentage kidnapped has been 10–15 percent in the last few years. In Belgium less than 5 percent fled political instability or wars (Dutch National Rapporteur 2004; Vermeulen and van der Beken 2004).⁸

The European data refer mainly to adult victims; the situation concerning minors, who make up a large percentage of the victims outside the industrialized countries, is different. Very few had any previous working experience, and almost all were recruited by force or sold by their families. Thus they were passive bystanders even at the point of recruitment (Mon-Eu-Traf II 2004; Muhonen 2005).

To sum up, the victims of sexual exploitation-related trafficking in Europe and other industrialized countries are usually older than in third-world countries, where a large proportion are minors. Even in the industrialized countries, the victims of prostitution-related trafficking are typically younger than those of other forms of trafficking and come from more depressed economic circumstances. In Europe, over 40 percent of victims of prostitution-related trafficking are unemployed at the time of recruitment, and many have no previous working experience. Of those with a job, for about a third it is prostitution. A large percentage of victims are single mothers with economic responsibility for their children and often for other relatives. The European data indicate that the victims of prostitution-related trafficking have, on average, fewer choices than the victims of other types of trafficking when deciding whether to accept the offer made. This is even more evident in Asia, Africa, and Latin America, where the bulk of victims are minors recruited by force or sold by their families and have not even in theory any capacity to influence their fate (Mon-Eu-Traf II 2004; Muhonen 2005).

Women become victims of prostitution-related trafficking mainly because of the economic and social circumstances of their lives rather

⁸ Low figures are not intended to trivialize the problem; it may indeed be conceived as very high if as many as 5–20 percent of all trafficked women have been forcibly abducted! This would also indicate that it is not always overly easy to recruit women to this trade, considering that abduction/kidnapping is a demanding and risky method.

than because of their personal characteristics. Some data, however, indicate that economic and social circumstances are not the only explanation for victimization. According to Dutch, Bosnian, and Nigerian data, the risk of victimization increases significantly if economic and social deprivation is combined with dysfunctional and abusive family relations. Among Bosnian victims, family relations explain victimization better than economic or social factors (Dutch National Rapporteur 2004; Vermeulen and van der Beken 2004; Maljevic 2005). Some data indicate that personal characteristics have some role to play in victimization at least in Europe. According to a recent IOM study from Romania, victims of prostitution-related trafficking are more independent and keener to take risks than their age-mates. Most come from broken families, but they also usually have more materialistic values than their age-mates and do not value education as the means to achieve success. They also have an above-average propensity to break official and informal rules.⁹ Thus the general profile of an adult victim of prostitution-related trafficking in Europe in many respects is similar to that of victims of other types of sexual and violent crime (IOM 2003e).

C. Organizers and Forms of Organization

Trafficking operations inside and to Europe are usually carried out in cooperation with several relatively small local criminal groups. Vermeulen and van der Beken (2004) classify the organizers into three main categories: loners who operate as individuals; isolated groups consisting of two or more persons accounting for recruitment, transport, and exploitation; and clusters of persons operating as criminal networks. According to them, the last category is responsible for 50–80 percent of the volume of trafficking in western Europe. The clusters consist mainly of smaller networks of pimps with a common contact point where the victims arrive and the profits leave. The contact point operates directly or through go-betweens. The networks have a flexible composition rather than a strong hierarchical structure, and the elimination of one cluster does not usually affect the activity of the whole network. The deleted link is replaced by another. The relations between groups are normally pure business relations, and each group or individual can act in several networks simultaneously. The structure

⁹ Whether such characteristics are produced or at least reinforced by their status is not indicated.

allows a painless assimilation of competing independent operators, either loners or smaller groups, into the network. In this way, the independent smaller groups dealing with trafficking often become entangled in the long run in major (organized) crime groups or networks (NCIS 2002, pp. 34–36; Mon-Eu-Traf II 2004).

According to the Belgian data, about 40 percent of the victims of sexual exploitation are trafficked by large networks with five or more mediators, and about 45 percent by smaller networks with two to four mediators. The networks trafficking humans for other purposes are smaller: only about 20 percent of victims of economic exploitation are trafficked by large networks (about 50 percent are trafficked by smaller networks). The significance of loners is substantially higher in economic exploitation than in sexual exploitation: only about 15 percent of victims of prostitution-related trafficking in Belgium are trafficked by loners. The corresponding percentage in other fields of trafficking is about 30 percent. Small networks and loners also dominate the smuggling of illegal immigrants to Belgium (Vermeulen and van der Beken 2004). Thus, in western Europe the organization of trafficking seems to differ significantly depending on the type. The networks specialized in trafficking for sexual exploitation are larger and have more complicated structures (Mon-Eu-Traf II 2004).

The ethnic backgrounds of the networks differ depending on the type of exploitation. The available data refer usually to the backgrounds of the exploiters operating in the countries of destination, who are easiest to indict and bring to court. In Belgium, about 40 percent of offenders in cleared trafficking crimes linked with prostitution have been ethnic Albanians, whereas the bulk of offenders in illegal labor-related trafficking have been Belgian citizens. Groups of mixed nationalities make up about a third of offenders in all forms of trafficking and human smuggling (Vermeulen and van der Beken 2004). The situation seems to be the same in most European countries. Organized prostitution and related trafficking are often in the hands of ethnic or foreign criminal groups and networks, whereas other forms of trafficking are usually perpetrated by native citizens. However, regardless of the type of trafficking, both recruiters and transporters are usually of the same nationality as the victim (Mon-Eu-Traf II 2004).

The gender structure of trafficking networks varies from region to region. In the Baltic countries, in parts of Russia, and in central Asia, the majority of recruiters are women, often former prostitutes. How-

ever, the networks are usually led by men, and the majority of those who handle the transport, control, and pandering of victims in the destination countries are men, although some women are involved (IOM 2001*a*; Lehti and Aromaa 2002, pp. 60–64). In western Europe the networks seem to be dominated even more by men than in the Baltics. In the Netherlands, to which prostitutes are mainly trafficked from the Balkans and central Europe, female recruiters are involved only in about 20 percent of the cleared cases of prostitution-related trafficking (Dutch National Rapporteur 2004).

There are also examples of networks run to a large extent by women. From central Asia, several cases of networks recruiting, trafficking, and exploiting women for prostitution have been reported that have been operated by women only (IOM 2001*a*). Organized Nigerian prostitution in Italy is largely controlled by women (although recruiting and transportation of victims are often handled by men) (Bopp and Cauduro 2004). In some other parts of Africa, for example, in Malawi, prostitution-related trafficking is mainly operated by female-led and operated networks. The same applies to the large-scale trafficking in domestic servants from Ecuador to Belgium, which is organized (both recruiting in Ecuador and running the business in Belgium) mainly by women (many of them earlier victims) (IOM 2003*d*; Ghijs 2004, pp. 57–82; Mon-Eu-Traf II 2004).

Although trafficking in western Europe and the Balkans is mainly controlled and organized by men, prostitution-related trafficking, either in Europe or elsewhere, is not organized and run solely by men. Women work in large numbers as recruiters and in the control activities in most trafficking networks, but there are also a large number of networks organized and run by women only. This reality is often overlooked by those who see trafficking for sexual exploitation as a crime solely perpetrated by men against women.

D. Modi Operandi

Victims are recruited by individual recruiters, through newspaper and Internet advertisements, or by front agencies offering employment opportunities abroad. The current trend, at least in Europe and in West Africa, is toward personal recruiting rather than general advertising; the recruiting is also increasingly done by people the victims know and trust. According to Nigerian data from Edo State, the majority of interviewed victims were recruited through family members

or close friends; only one-fourth were recruited by strangers or through Internet or newspaper advertisements. The current situation in Europe is similar: according to Bosnian, Czech, and Dutch data, the majority of victims are recruited through acquaintances, friends, or relatives. The majority of victims in West Africa were actively searching for job opportunities abroad at the time of their recruitment. In Europe, contacts with unknown recruiters are usually made in places of entertainment: discos, bars, hotels, and restaurants (Hajdinjak 2002, p. 51; NCIS 2002, p. 35; Sipaviciene 2002, p. 14; Dutch National Rapporteur 2004; *Trafficking of Nigerian Girls to Italy* 2004, pp. 67, 73; Travnickova 2004, p. 91; Maljevic 2005).

The most common recruiting method for adults throughout the world consists of promises of employment opportunities, often in hotel, catering, and entertainment industries or as domestic servants and nannies. Some victims are recruited knowingly into prostitution, and a large percentage of others know that there exists a substantial risk that they may end up in prostitution.

However, even these cases satisfy the criteria for trafficking if the recruitment or the conditions of employment include deception, coercion, or violence. Women and especially children are recruited by abduction or sold to traffickers by their families. In western Europe the percentage of identified victims who have been outright kidnapped or sold into prostitution is altogether less than 20 percent; most of these cases are from the Balkans, especially Albania and Kosovo. Outside the industrialized countries, recruiting by force is more common. Especially where a large percentage of victims are minors, both abduction and selling by relatives are prevalent. For example, in Cambodia, where minors make up the majority of victims of organized prostitution, they have almost without exception been sold to traffickers by their parents, who also receive a share of the income. The situation is similar in parts of Africa, South and Southeast Asia, and Latin America (Mon-Eu-Traf II 2004; *Trafficking of Nigerian Girls to Italy* 2004; Muhonen 2005).

The departure usually takes place quickly (in the Netherlands in nearly 70 percent of investigated cases the departure was within a week after recruitment [Dutch National Rapporteur 2004]). The women either are transported directly to the ultimate destination country, and engaged in prostitution upon arrival, or are moved in stages, in which

case they often are exploited at each stage (NCIS 2002, pp. 34–36; *Trafficking of Nigerian Girls to Italy* 2004).

Once recruited, victims are controlled in various ways, but violence (implied and actual) is common and ever-present. Often there is first an initiation period, lasting for a couple of weeks, during which the victim's resistance and will are broken by a combination of psychological and physical pressure and violence. After the victim submits to the wishes of her or his traffickers, open violence usually becomes less common. There are, however, in this respect substantial differences among the trafficking networks in how they operate.

In Europe, trafficking from and through the Balkans was earlier exceptionally violent. However, the working methods of the Balkan groups seem to have become less violent lately, and open violence seems to be becoming less common among other networks operating in Europe. Traffickers have become aware that the business can be organized and run more effectively and profitably when the victims are engaged on a relatively voluntary basis. Earlier victims are increasingly used as recruiters (Laczko, Klekowski von Koppenfels, and Barthel 2002, p. 15; Lehti and Aromaa 2002, pp. 87–92; NCIS 2002, pp. 35, 38–39; Maljevic 2005).

Traffickers also exploit the economic, social, and cultural vulnerabilities of victims. Debt is one of the most common means of control. The women usually agree to pay recruiting expenses from future earnings. This debt is passed from one trafficker to the next until it ends up in the hands of the exploiter in the destination country. Combined with inflated housing and living expenses charged to victims, repayment usually takes months, even years, and in many cases becomes impossible to handle. The earnings of the victims are directed to the pockets of the exploiters, and the women have no financial means to escape. In regions of Africa, Asia, and Latin America in which the prostitution of minors is common and victims are often sold to traffickers by parents or near relatives, it is not uncommon for a share of the victim's earnings to be paid directly to their families monthly or annually.

Another globally used control method, especially in transborder trafficking, is to confiscate passports and other identity documents and to threaten victims with local authorities, detention, and deportation. The threats are effective because they are at least partly real: in industrialized and third-world countries, it is almost impossible for victims to

avoid deportation even in the most aggravated cases of abuse (NCIS 2002, p. 36; Muhonen 2005).

In some regions the religious beliefs of the victims can be used as a control method. In Nigeria and other parts of West Africa, victims are often obliged to make an oath before traditional shrines or spiritualists before they depart, agreeing to repay a certain sum of money to their *mamans* after they have arrived at their destination. This kind of psychological bondage is said to be even more effective than violence or economic bondage (*Trafficking of Nigerian Girls to Italy* 2004, pp. 75–76).

Relatives and families are used in several ways as a control method. Especially in the trafficking of minors, families are sometimes co-exploiters. In these cases the victim often sees prostitution as her or his social obligation and submits without resistance to the wishes of the traffickers. The victims can also be controlled through economic or violent threats to the relatives and through the (actual or imagined) shame that public knowledge about her or his situation would cause them (*Trafficking of Nigerian Girls to Italy* 2004, pp. 75–76; Muhonen 2005).

Victims of sexual exploitation are usually significantly worse treated and more threatened and deprived of their freedom than victims of economic exploitation or human smuggling. According to Belgian data, 50–60 percent of victims of sexual exploitation are assaulted, raped, or subjected to aggravated mental abuse during transportation or exploitation; the corresponding percentage among victims of other forms of trafficking is about 10 percent and among smuggled illegal immigrants about 5 percent. Victims of sexual exploitation are also usually subjected to much graver economic abuse than other victims of trafficking,¹⁰ and they are more strictly controlled.¹¹ All kinds of threats are also more common in sexual exploitation¹² (Vermeulen and van der Beken 2004).

¹⁰ In Belgium, 40 percent of the victims of sexual exploitation receive no pay at all from their exploiters, compared with under 20 percent of other victims of trafficking.

¹¹ In Belgium, about 45 percent are allowed no personal freedom, compared with 10 percent for those trafficked for labor exploitation; among those exploited sexually, 35 percent are subjected to continuous control, compared with 5 percent of those exploited economically.

¹² In Belgium, of victims exploited sexually, 45 percent are subjected to personal threats and 23 percent have been intimidated indirectly, by threats to harm their families; the corresponding percentages for victims of other types of trafficking are 15 percent and 5 percent.

The Belgian figures are aggregates. Italian, Russian, and Chinese data show that there are substantial differences in the treatment of victims and in the ways the activity is organized not only between but also inside different forms of trafficking. These differences depend mainly on the ethnic backgrounds and traditions of the organizers.

According to Bopp and Cauduro (2004), in Italy the organization of prostitution-related trafficking in the main recruiting areas (Nigeria, Albania, and eastern Europe) varies substantially. The Nigerian networks have loose structures and operate mainly in and from Nigeria; they have bases in Europe through which women are transported before arriving in Italy. Exploitation in Italy is handled by resident Nigerian women, *mamans*, often former victims themselves. The Albanian networks consist of small and autonomous groups (based on shared ethnicity and bonds of clan membership) with an internal hierarchical organization. Open violence is the standard method to reinforce the hierarchy and to control and subjugate victims. The networks usually handle the whole operation from recruitment to exploitation. The groups that control the trafficking of eastern European women are less structured, and the process is highly fragmented. The victims are usually repeatedly bought and sold during the journey from their countries of origin, and their exploitation in Italy is often handled by local criminals.

Differences in the organization of trafficking are reflected in the exploitation process. Nigerian women must work for the networks until they have repaid their transfer costs, which usually takes two years. Many who survive the period (which is not inevitable because of the harsh living and working conditions) join the network and continue working as *mamans*. Albanian women are forced to work as prostitutes for an indeterminate period, sometimes their entire lives. The rules imposed on them and the modes of recruitment (deceit or abduction) imply unconditional exploitation. Eastern European women in principle have the least restricted working conditions and usually arrive with the intention of prostituting themselves only for a couple of months: the time needed to save enough to live for the rest of the year. Their prostitution is to a large extent based on contracts for a fixed period. However, their working conditions are often worse than is agreed on in advance, and the periods of work become longer than planned (Bopp and Cauduro 2004).

Shelley shows important differences between the organization of

trafficking in Russia and China and explains the differences by reference to cultural traditions. Chinese organized crime groups operate as integrated networks, running and controlling all phases of trafficking from recruitment to exploitation. The groups run their operations like businesses, and the victims are treated as valuable commodities to be taken care of. Although conditions are often harsh and the payments the victims obtain for their work are small, aggravated cases of abuse are few, agreements are kept, and victims are free after they have paid their debts. Honoring of agreements is necessary and advantageous because groups usually use former victims to recruit new ones, often among their relatives and families. The operations are thus based on long-term business and profit interests, and the groups invest most of their profits into the Chinese economy. These characteristics guarantee a fairly humane operations model, although violence and abuse are not unknown (Shelley 2004).

The methods of the Russian groups are radically different. While the Chinese groups traffic persons mainly for labor and operate on a long-term profit basis, the Russians have specialized in trafficking for prostitution and aim to maximize short-term profits. Victims are hunted all over the country, often recruited with violent intimidation or abduction, and are sold abroad to foreign exploiters who pay the best prices. The survival or destiny of the victims does not concern the traffickers, since they act only as recruiters and deliverers of commodities and are not involved in the exploitation. Aggravated violence, rape, coercion, and other forms of serious abuse are common, and only a few victims can leave prostitution later or profit financially from their exploitation. The profits are rarely reinvested and almost never repatriated to Russia (Shelley 2004).

Shelley attributes the differences to national cultures. Chinese organized crime operates according to old Chinese business traditions, whereas the Russian criminal groups act like ancient trappers: operating within a short time frame and spending earnings on a luxurious life. The differences are also probably influenced by the differences in the types of trafficking the Chinese and Russian groups are involved in. Chinese organized crime traffics mainly in human labor, whereas the Russian groups mostly traffic women for prostitution. Trafficking related to prostitution at least in Europe is generally more violent and operates with shorter time frames than trafficking in illegal labor.

To sum up, at least in Europe, the organizational and operational

models of different types of trafficking differ significantly, and there also exist substantial differences related to the ethnic background and traditions of the perpetrators. Trafficking for prostitution is infested to a much larger extent with aggravated human rights abuses than are other forms of trafficking. Victims of sexual exploitation are subjected to aggravated violence and intimidation, rape, and other forms of gross abuse more often than victims of labor exploitation. They are also more tightly controlled than other victims and often receive no financial compensation.

There are, however, significant differences between different ethnic trafficking networks. In Europe the victims in the worst position are those trafficked by Balkan networks. The situations of central and eastern European victims are somewhat better, partly because they are, on average, better educated and have higher social backgrounds and thus have better abilities to defend themselves and seek help. Central and eastern European trafficking networks are more fragmented and control their victims less tightly than do the Balkan groups. This does not mean that all eastern European victims are better off than those from other source areas, and the differences are relative, since the eastern European women also are subjected to abuse and coercion.

The social and economic functions and consequences of trafficking differ from country to country. In eastern Europe and the Balkans, trafficking is to a very large extent focused only on prostitution and has no positive effects whatsoever. Large-scale export of women of fertile age to practical slavery abroad worsens the demographic distortions in these areas and leads to more rapid demographic and social decline. As the operations are based on short-term profit maximization and the profits are usually neither reinvested nor repatriated, the crime does not financially benefit local communities.

In some other regions, even large-scale trafficking despite its abusive characteristics has some positive social and economic functions. In these cases it is a matter of long-established traditions of trafficking and smuggling of human labor abroad. Although prostitution-related trafficking is an important part of local economies in some parts of the world, the human rights abuses and socially corruptive influences it involves are so grave that it can scarcely be considered anywhere to have positive functions (Shelley 2004).

III. International Agreements and Practices

Use of the concepts “trafficking in women” and “trafficking in persons” is inconsistent and confused, partly because of the diversity of the phenomena and the national laws regulating them, and divergent ideological and moral attitudes toward prostitution, the commercial sex trade, and (irregular) migration. Trafficking in women and trafficking in persons are social phenomena with multiple dimensions, and it is impossible to encapsulate them into one definition or framework. The confused use of the concepts also relates to the history and changing objectives of international legislation. In this section we describe the evolution of the concepts in international legislation over the past century and their use in modern American and European legislation.

A. *Trafficking in International Legislation*

Modern international agreements on trafficking go back to early twentieth-century treaties on the slave trade, the white slave trade, and prostitution. Until the 1990s, trafficking related to commercial sex was regulated separately from other forms of trafficking in persons. Since 2000, the two have been joined in the Palermo Protocol.¹³ The context has changed from combating slavery or prostitution to the international fight against organized crime.

1. *The Regulation of Slave Trade.* The international regulations concerning trafficking relating to the exploitation of human labor have their roots in the treaty system created to prevent slavery and the slave trade,¹⁴ culminating in the Geneva Convention of 1926.¹⁵ The original convention had a fairly restricted scope comprising only slavery and the slave trade. Slavery was defined as “a status or condition of a person over whom any or all of the powers attaching to the right of ownership

¹³ United Nations 2000 Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime (Palermo Protocol; A/RES/55/25).

¹⁴ Including the General Act of Berlin of 1885, the General Act of the Brussels Conference of 1889–90 concerning the African Slave Trade (between Great Britain, Austria-Hungary, Belgium, Congo, Denmark, France, Germany, Italy, the Netherlands, Persia, Portugal, Russia, Spain, Sweden, Norway, Turkey, the United States, and Zanzibar), and the Convention of Saint-Germain-en-Laye of 1919, to revise the General Act of Berlin of 1885, and the General Act and Declaration of Brussels of 1890.

¹⁵ The signatories of the 1926 convention were Albania, Australia, Austria, Belgium, the British Empire, Bulgaria, Canada, China, Colombia, Cuba, Czechoslovakia, Denmark, Estonia, Abyssinia, Finland, France, Germany, Greece, India, Italy, Latvia, Liberia, Lithuania, New Zealand, the Netherlands, Norway, Panama, Persia, Poland, Portugal, Romania, the Kingdom of the Serbs, Croats, and Slovenes, Spain, Sweden, the Union of South Africa, and Uruguay.

were exercised." The slave trade included "all acts involved in the capture, acquisition, or disposal of a person with intent to reduce him to slavery; all acts involved in the acquisition of a slave with a view to selling or exchanging him; all acts of disposal by sale or exchange of a slave acquired with a view to being sold or exchanged, and, in general, every act of trade or transport in slaves" (article 1). The signatories were obliged to suppress the slave trade, to abolish slavery in all its forms, and to criminalize the slave trade and slavery in their territories and colonies. The convention also included stipulations concerning other forms of forced labor. It was allowed only for public purposes and on the responsibility of the competent central authorities of the territory concerned, always had to involve adequate remuneration, and could not involve removal of laborers from their places of residence. All forms of forced or compulsory labor were to be abolished progressively.

The scope of the Geneva Convention was enlarged substantially in the Supplementary Convention of 1956. The definition of slavery (and its criminalization) was broadened to include debt bondage and serfdom. Some forms of trade in women and children were included in the list of banned practices. From the viewpoint of traffic in women and children, the most important new stipulations were paragraphs *c* and *d* of the first article, which obliged the parties to abolish forced paid marriages, some forms of trade in women by relatives, and all forms of trade in children under eighteen years of age by relatives or guardians:

Each of the States Parties to this Convention shall take all practicable and necessary legislative and other measures to bring about progressively and as soon as possible the complete abolition or abandonment of . . .

- (c) any institution or practice whereby:
 - (i) A woman, without the right to refuse, is promised or given in marriage on payment of a consideration in money or in kind to her parents, guardian, family or any other person or group; or
 - (ii) The husband of a woman, his family, or his clan, has the right to transfer her to another person for value received or otherwise; or
 - (iii) A woman on the death of her husband is liable to be inherited by another person.
- (d) Any institution or practice whereby a child or young person

under the age of eighteen years is delivered by either or both of his natural parents or by his guardian to another person, whether for reward or not, with a view to the exploitation of the child or young person or of his labour.

In the second paragraph of the sixth article, committing, encouraging, and aiding the named acts were criminalized. The 1926 convention and the 1956 supplementary convention prohibited both international and intranational trade and transfers.

The 1926 and 1956 conventions focused on the slave trade and related forms of servitude and forced labor. The conventions continue to exist and remain in effect today and are germane especially to the prevention and combat of trafficking related to exploitation of human labor and to trafficking for domestic servants. The antislavery treaties have had and today have, however, only limited significance to trafficking for sexual exploitation (although slavery and related institutions have always included various forms of sexual exploitation and abuse).

2. *The Regulation of Prostitution.* Modern international conventions on trafficking related to sexual exploitation have their basis in the international regulation of prostitution, with roots in treaties of the first half of the twentieth century¹⁶ culminating in the 1949 Convention for the Suppression of the Traffic in Persons and of the Exploitation of the Prostitution of Others.

The first modern wave of rapid increase in migratory prostitution and related trafficking took place between the 1840s and the First World War and was closely connected with the industrial revolution, urbanization, and European colonialism, and the migration flows and social and economic changes these processes caused all over the world. The growth of international and local prostitution was mainly seen and discussed as a question of immigration policies, colonial management, and public health. Governments in Europe and North America tried to regulate the increase by tightening the control of prostitutes, especially foreign and non-European ones (Scully 2001, pp. 75–83).

The beginnings of the international antitrafficking movement oc-

¹⁶ That is, the International Agreement of 18 May 1904 for the Suppression of the White Slave Traffic, the International Convention of 4 May 1910 for the Suppression of the White Slave Traffic, the 1921 Convention for the Suppression of the Traffic in Women and Children, the 1933 Convention for the Suppression of the Traffic in Women of Full Age, and the 1947 Protocol to Amend the Convention for the Suppression of the Traffic in Women and Children of 30 September 1921, and the Convention for the Suppression of the Traffic in Women of Full Age of 11 October 1933.

curred in Britain in the last few decades of the nineteenth century. In the 1890s, various British abolitionist groups formed the National Vigilance Association (NVA), which became the nucleus of a European antitrafficking coalition. National committees were soon created under NVA supervision in various European countries (including Austria, Belgium, Denmark, France, Germany, the Netherlands, Russia, Sweden, and Switzerland). In 1899 these committees organized an international conference in London, which became the starting point for the international campaign against the "white slave trade" that culminated in the 1904 Paris Conference and Convention. The focus was on abolition of the traffic in European women for prostitution. Non-European native and colonial prostitution came within the scope of the antitrafficking movement only after the First World War (Scully 2001, pp. 84–85).

The 1904 Paris Convention among the major European powers¹⁷ was the first of six international treaties on prostitution and prostitution-related trafficking in the twentieth century. It recognized the white slave trade as a juridical concept in international law and had high objectives: "being desirous of securing to women of full age who have suffered abuse or compulsion, as also to women and girls under age, effective protection against the criminal traffic known as the 'White Slave Traffic,' [the signatories] have decided to conclude an Agreement with a view to concerting measures calculated to attain this object." In practice the measures taken were restricted to recommendations on collecting information on international cross-border prostitution and harmonization of procedures used in the repatriation of foreign prostitutes to their native countries. The criminalization of traffic in women and children and related activities was left exclusively to regulation by internal legislation of the contracting states.

The next convention in 1910 was substantially more ambitious. It criminalized all forms of exploitation by third parties of minors' prostitution (persons under twenty years of age) and forced prostitution of adults (articles 1 and 2). Criminalization was restricted to female prostitution but included both international cross-border prostitution and national prostitution. There was one important exception: prostitution in brothels, even forced prostitution, and regardless of the age of the

¹⁷ The signatories were the United Kingdom, Germany, Denmark, Belgium, Spain, France, Italy, the Netherlands, Portugal, Russia, Sweden, Norway, and Switzerland.

prostitutes, was not regulated by the convention but left exclusively to national legislation.

The 1910 convention provided:

Article 1: Whoever, in order to gratify the passions of another person, has procured, enticed, or led away, even with her consent, a woman or girl under age, for immoral purposes, shall be punished, notwithstanding that the various acts constituting the offense may have been committed in different countries.

Article 2: Whoever, in order to gratify the passions of another person, has, by fraud, or by means of violence, threats, abuse of authority, or any other method of compulsion, procured, enticed, or led away a woman or girl over age, for immoral purposes, shall also be punished, notwithstanding that the various acts constituting the offense may have been committed in different countries.

A separate final protocol of the treaty stated that the stipulations of articles 1 and 2 were to be considered minimums, and the contracting states were free to punish other analogous offenses, such as, for example, procurement of adult women, even when neither fraud nor compulsion was involved. It also included stipulations concerning punishments and aggravating circumstances (those referred to in article 2).

In 1913, a broad coalition of antitrafficking groups agreed in Madrid on a joint agenda of future action, which focused on eight main points: abolition of licensed brothels, creation of a global data bank on victims of trafficking, creation of programs for assisted repatriation and rehabilitation of victims, creation of methods to protect female emigrants en route, uniform legislation on regulation of employment agencies offering jobs abroad, total criminalization of trafficking of minors for prostitution regardless of the consent of the victims, full suppression of colonial prostitution, and more effective punishment of procurers and third parties involved in the exploitation of the prostitution of others (Scully 2001, p. 87).

The First World War caused a break of several years in development of new antitrafficking legislation (and at the same time led to a major increase in organized and unorganized prostitution in all war theaters). After the war, the main responsibility for antitrafficking efforts and legislation was transferred to the new League of Nations, which began its work with optimistic spirits and expansive proclamations. The factual achievements of the league in its antitrafficking and prostitution

policies during its short existence, however, were modest, although not insignificant (Scully 2001, pp. 87–88).

No international data bank was ever created (no such data bank exists today), and the gathering of information remained sporadic. Data collection was based mainly on self-reporting by the signatories of the treaties, annual conferences of enthusiasts and specialists, and traveling commissions of inquiry (Scully 2001, p. 88).

The 1921 convention¹⁸ mainly reinforced the stipulations and obligations agreed on in the earlier prostitution treaties. The influence of the Madrid agenda of 1913 was seen in some changes in the earlier criminalizations. The emphasis of the new treaty was on the suppression of traffic in children, and in contrast to the convention of 1910, traffic in boys also was now criminalized (article 2). The age of majority was raised by one year to twenty-one years of age (article 5).

The treaty also included new stipulations concerning the protection of immigrant women and children and regulations concerning licensing and supervision of employment agencies and offices to ensure the protection of women and children seeking employment abroad (article 6):

Article 6. The High Contracting Parties undertake in connection with immigration and emigration to adopt such administrative and legislative measures as are required to check the traffic in women and children. In particular, they undertake to make such regulations as are required for the protection of women and children travelling on emigrant ships, not only at the points of departure and arrival, but also during the journey, and to arrange for the exhibition, in railway stations and in ports, of notices warning women and children of the danger of the traffic and indicating the places where they can obtain accommodation and assistance (article 7).

The criminalizations of the 1910 treaty were broadened further in the 1933 Convention for the Suppression of the Traffic in Women of Full Age,¹⁹ in which all forms of exploitation of female prostitution by third

¹⁸ Between Albania, Germany, Austria, Belgium, Brazil, the British Empire (with Canada, the Commonwealth of Australia, the Union of South Africa, New Zealand, and India), Chile, China, Colombia, Costa Rica, Cuba, Estonia, Greece, Hungary, Italy, Japan, Latvia, Lithuania, Norway, the Netherlands, Persia, Poland (with Danzig), Portugal, Romania, Siam, Sweden, Switzerland, and Czechoslovakia.

¹⁹ The signatories included Albania, Austria, Belgium, the British Empire (with Canada, the Commonwealth of Australia, the Union of South Africa, New Zealand, and India), Bulgaria, Chile, the Republic of China, the Free City of Danzig, France, Germany,

parties were criminalized. This general criminalization for the first time included cases in which exploitation was based on mutual consent. However, the stipulation concerned only international cross-border prostitution:

Article 1. Whoever, in order to gratify the passions of another person, has procured, enticed or led away even with her consent, a woman or girl of full age for immoral purposes *to be carried out in another country*, shall be punished, notwithstanding that the various acts constituting the offense may have been committed in different countries. (Emphasis added)

The treaty in article 3 also tightened up earlier stipulations concerning the prevention and control of prostitution-related trafficking and organized pandering by including new regulations on international data exchange and police cooperation (article 3).

After the dissolution of the League of Nations, the prostitution treaties were incorporated in the U.N. treaty system in 1947 by the Protocol to Amend the Convention for the Suppression of the Traffic in Women and Children of 30 September 1921 and the Convention for the Suppression of the Traffic in Women of Full Age of 11 October 1933. The substance of the treaties was left unchanged.

A new broader treaty on prostitution and trafficking was agreed on in 1949 when the Convention for the Suppression of the Traffic in Persons and of the Exploitation of the Prostitution of Others was signed. For the first time, the abolitionist ideology that had inspired and dominated international prostitution policies since the 1890s was expressed in clear words in the preamble: "Prostitution and the accompanying evil of the traffic in persons for the purpose of prostitution are incompatible with the dignity and worth of the human person and endanger the welfare of the individual, the family and the community." The ideology was most clearly expressed in articles 6 and 16, in which all forms of licensing of prostitutes were prohibited. Signatory states were obliged to take and encourage measures for the prevention of prostitution as a whole through public and private educational, health, social, economic, and other services.

The changes in the earlier criminalizations were also substantial. The criminalizations of the earlier prostitution treaties were united in

Greece, Hungary, Latvia, Lithuania, Monaco, the Netherlands, Norway, Panama, Poland, Portugal, Spain, Sweden, Switzerland, Czechoslovakia, and Yugoslavia.

article 1 of the 1949 convention, which prohibited all forms of exploitation of prostitution (regardless of the age or sex of the prostitutes) by third parties. As in the criminalization in the 1933 convention, article 1 of the 1949 convention also included cases in which exploitation was based on mutual consent. However, application of the criminalization was much broader than in 1933. It now included all prostitution and trafficking, whether international borders were crossed or not, and regardless of the nationality of the prostitutes.

The current international regulation of trafficking in women has ensued to a large extent as a by-product of the general regulation of prostitution, and for a long time its criminalization has been part of a far more extensive criminalization of exploitation of prostitution of others. It is not surprising that the borderline between trafficking and prostitution in international discussion has been and remains obscure, because the setting of this border is new and exists only in the international treaties of the last decade.

The terms "white slave traffic" and "trafficking" have had varying definitions in international legislation. The term white slave traffic was used in the 1904 and 1910 conventions as a synonym for organized, illegal prostitution, both international and national. The term "traffic in women and children" made its first appearance in international treaties in the 1921 convention, where it was used as a synonym for the white slave traffic of the earlier treaties. Although the treaty, like the two previous ones, emphasized international cross-border prostitution and trafficking,²⁰ the criminalizations included all prohibited activity, whether or not international borders were crossed. This was, however, not the case in the 1933 treaty, which concerned only international, cross-border prostitution.

The regulatory system created by the treaties of 1904–47 criminalized all forms of exploitation of the prostitution of minors (except buying) and the prostitution-related trafficking in children regardless of sex or of whether international borders were crossed. The age of majority in these treaties was initially twenty and then later twenty-one years of age.

Regulations concerning prostitution of adults were more ambiguous. Under the 1910 and 1921 treaties, the forced prostitution of females and trafficking in women were criminalized whether or not interna-

²⁰ See articles 6 and 7, which regulated cross-border trafficking only.

tional borders were crossed. However, the criminalization of the 1933 convention concerning the exploitation by third parties of female prostitution on mutual consent was applicable only to international cross-border prostitution. The concept of trafficking in all of them can be seen to have included at minimum all forms of exploitation of child prostitution by others (except buying), forced female prostitution of adults, and trafficking inside national borders and over international borders.

In the 1949 convention, in which “traffic in persons” was mentioned in the preamble separately from prostitution, in the text of the treaty the term was used only in article 17, which mainly referred to international cross-border prostitution and its supportive services:

Article 17. The parties to the present convention undertake, in connection with immigration and emigration, to adopt or maintain such measures as are required in terms of their obligations under the present convention, to check the traffic in persons of either sex for the purpose of prostitution. In particular they undertake:

1. To make such regulations as are necessary for the protection of immigrants or emigrants, and in particular, women and children, both at the place of arrival and departure and while en route;
2. To arrange for appropriate publicity warning the public of the dangers of the aforesaid traffic;
3. To take appropriate measures to ensure supervision of railway stations, airports, seaports and en route, and of other public places, in order to prevent international traffic in persons for the purpose of prostitution;
4. To take appropriate measures in order that the appropriate authorities be informed of the arrival of persons, who appear, *prima facie*, to be the principals and accomplices in or victims of such a traffic.

Although the term “traffic in persons” was used more restricted than in the earlier treaties, the convention broadened the concept’s scope. Unlike the 1910 or the 1933 treaties, articles 1 and 17 of the 1949 convention included all forms of prostitution, including prostitution by mutual consent of the parties, and regardless of whether international borders had been crossed.

The 1949 convention had been joined by the end of the 1990s by

sixty-eight states, including twenty European countries.²¹ It has not been ratified by the United States, the United Kingdom, Canada, Germany,²² the Netherlands, Sweden, or Australia. Most, however, are parties to the 1921 and 1933 conventions.

In a more general way, but with the same substance, the prohibition of all forms of trafficking in women and exploitation of prostitution of women were included in the sixth article of the 1979 Convention on the Elimination of All Forms of Discrimination against Women: "States Parties shall take all appropriate measures, including legislation, to suppress all forms of traffic in women and exploitation of prostitution of women."

3. *The Regulation of Organized Crime.* The two lines of regulating trafficking in persons in international legislation were joined in 2000 in the Palermo Protocol. The context of the regulation changed substantially from the earlier ones. The primary objective of the Palermo Protocol is the regulation of neither the slave trade nor prostitution, but international cooperation in the prevention and control of organized crime. This can also be seen in the formulation of the articles criminalizing trafficking, in which prostitution has no special status (although particular attention is paid to crimes against women and children). Trafficking in persons is defined as in article 3, subparagraph *a*: "the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation."

The criteria of the crime, thus, include three main elements, all critical: the act of the perpetrator, the intentional recruitment (see article 5), transportation, transfer, harboring, or receipt of persons; the means by which this act is perpetrated (threat, use of force, other forms of coercion, etc.); and the goal of the act: exploitation. According to article 3, exploitation includes, among other things, "the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servi-

²¹ The European countries that were parties of the convention in 1992 were Albania, Belarus, Belgium, Bulgaria, Cyprus, Czechoslovakia, Denmark, Finland, France, Hungary, Italy, Latvia, Luxembourg, Norway, Poland, Romania, Russia, Spain, Ukraine, and Yugoslavia.

²² The German Democratic Republic was part of the convention in 1974–90.

tude or the removal of organs.” The definition and criminalization of trafficking in the Palermo Protocol include both cross-border and intraborder acts. The consent of a victim is irrelevant if any of the means mentioned above was used. Acts perpetrated against persons under eighteen years of age are considered trafficking regardless of the means used, even in cases in which none of the listed means was used. Attempting to traffic in persons, to organize or direct other persons to commit the crime, or to participate as an accomplice are also criminalized.

The protocol is not limited to criminalizing trafficking in persons only, but also includes stipulations on victim protection and repatriation and general regulations concerning crime prevention and information exchange.

The Palermo Protocol is an organic continuation of the international regulation of trafficking in persons, which started in the early 1900s. At the same time it brings together the two separate lines of regulation. For the first time, all forms of trafficking are regulated in the same treaty by similar stipulations.

It is also the first major international treaty in which “trafficking in persons” is defined in detail. This definition varies in some substantial ways from how “trafficking” was used in earlier international treaties, especially the 1949 convention. The scope of criminalization in the protocol is similar to those in the 1910 and 1921 conventions, although the use of the concept is more restricted. As in the earlier treaties on prostitution and in the treaties on slave trade, trafficking in the Palermo Protocol includes both international (cross-border) and national (intraborder) activity. However, whereas the 1904, 1910, and 1921 conventions used trafficking as a synonym for all organized prostitution (although in the case of adults they criminalized only forced prostitution) and the 1949 convention criminalized all forms of the exploitation of prostitution of others, regardless of how it was perpetrated and organized, the Palermo Protocol considers and criminalizes as trafficking only those forms of exploitation of prostitution in which the free will of the prostitute has been violated by force, coercion, or fraud. The objective is not to regulate prostitution, but to combat organized crime, and prostitution is only one among the many forms of exploitation mentioned in the third article of the treaty as constituting the illegal purpose in trafficking.

B. Trafficking in Current U.S. and E.U. Legislation

The stipulations of the Palermo Protocol form the basis for both the U.S. and the E.U. legislation regulating crimes of trafficking. However, some differences can be observed.

In the United States the regulation of trafficking is based on the Trafficking Victims Protection Act (TVPA; 22 U.S.C. 7101 et seq.), passed by the Congress in 2000, and amended in 2003 by the Trafficking Victims Protection Reauthorization Act ("Trafficking in Persons Report" 2004, pp. 24–27). Severe forms of trafficking in persons are defined as:

- a) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age; or
- b) the recruitment, harbouring, transportation, provision, or obtaining of a person for labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

The U.S. legislation includes traces of the former dichotomy separating trafficking for commercial sex from other forms of trafficking. "Sex trafficking" comprises the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act. The concept "commercial sex act" is defined to mean any sex act on account of which anything of value is given to or received by any person. It should be noted that neither "prostitution" nor "commercial sex act" has so far been defined in the international treaties.

The definition in U.S. legislation is fairly broad. It is, however, much simpler than many other attempts to define prostitution found in national legislation.²³ "Coercion" is defined in American law in more detailed terms than in the Palermo Protocol. It comprises not only threats of serious harm or physical restraint against a person, but also "any scheme, plan or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person, and the abuse or threatened abuse of the legal process."

²³ So far, there exists no generally accepted international definition of prostitution that would cover the whole phenomenon and meet the needs of both research and legislation. One reason for this is that the creation of such a definition is very difficult if not outright impossible. This is also why the international treaties regulating prostitution have never tried to define the phenomenon they regulate (Turunen 1996, p. 10).

In the same way as in the Palermo Protocol, the criteria of trafficking in the TVPA do not require that a trafficking victim be physically transported from one location to another. The criteria can be met by any recruitment, harboring, transportation, provision, or obtaining of a person for the enumerated purposes.

In E.U. legislation the central stipulation is the framework decision 2002/629/JHA:

1. Each Member State shall take the necessary measures to ensure that the following acts are punishable: the recruitment, transportation, transfer, harbouring, subsequent reception of a person, including exchange or transfer of control over that person, where:
 - (a) use is made of coercion, force or threat, including abduction, or
 - (b) use is made of deceit or fraud, or
 - (c) there is an abuse of authority or of a position of vulnerability, which is such that the person has no real and acceptable alternative but to submit to the abuse involved, or
 - (d) payments or benefits are given or received to achieve the consent of a person having control over another person for the purpose of exploitation of that person's labour or services, including at least forced or compulsory labour or services, slavery or practices similar to slavery or servitude, or for the purpose of the exploitation of the prostitution of others or other forms of sexual exploitation, including in pornography.
2. The consent of a victim of trafficking in human beings to the exploitation, intended or actual, shall be irrelevant where any of the means set forth in paragraph 1 have been used.
3. When the conduct referred to in paragraph 1 involves a child, it shall be a punishable trafficking offense even if none of the means set forth in paragraph 1 have been used.
4. For the purpose of this Framework Decision, "child" shall mean any person below 18 years of age.

Article 1 obligates the member states to ensure that trafficking in human beings is punishable. The commission stressed trafficking especially as a gender problem: "In particular, women and children are

vulnerable to become victims of trafficking due to inter alia lack of education and professional opportunities . . . a comprehensive policy therefore needs to include a clear gender perspective” (Document COM 2000, p. 854). The definition adopted is, however, gender-neutral and reflects the key elements in the Palermo Protocol. The act of the perpetrator is defined identically, but the exchange or transfer of control over a person is added. In addition, the offense includes a requirement that the act be perpetrated by coercion, fraud, or other criminal means listed in the article and that the purpose of the act is to exploit the victim in forced labor, in prostitution, or in other ways. Trade in organs was left out of the forms of exploitation listed in the decision. In the original proposal, trafficking for sexual exploitation and for other forms of exploitation was regulated in separate articles. According to that proposal, “sexual exploitation” includes the purposes to exploit a person in prostitution, in pornographic performances, or in production of pornographic material (COM 2000, p. 854).

The criteria of the criminal offense do not include a requirement that the victim cross a border. The stipulation in this respect follows both the Palermo Protocol and the Europol Convention. Moreover, it is stressed that the key elements of the offense should focus on the exploitative purpose, rather than on the “movement” (COM 2000, p. 854).

As in the Palermo Protocol, the consent of a victim is always irrelevant if any of the means mentioned were used. Acts perpetrated against persons under age eighteen are to be considered as trafficking regardless of the means used, even when none of the listed means was used.

Article 2 criminalizes instigation of, aiding, abetting, and attempting to commit trafficking for the purpose of labor or sexual exploitation. Article 3 concerns the aggravated circumstances of trafficking. Four circumstances that typically should qualify trafficking as aggravated are listed. These circumstances represent a minimum list; additional definitions are possible in the legislation of the member states. Trafficking is considered as aggravated if the offense deliberately or by gross negligence endangered the life of the victim, the offense was committed against a victim who was particularly vulnerable, or the offense was committed by use of serious violence or caused particularly serious harm to the victim. Trafficking is also considered aggravated when it is committed within the framework of a criminal organization. This

stipulation is to be applied in accordance with article 1 of the 98/733/JHA Joint Action, which makes it a criminal offense to participate in a criminal organization in the member countries of the European Union.

C. Trafficking and Human Smuggling

According to the Palermo Protocol, “smuggling of migrants” means “the procurement, in order to obtain, directly or indirectly, a financial or other material benefit, of the illegal entry of a person into a state of which the person is not a national or a permanent resident.” According to the protocol, “illegal entry” means crossing borders without complying with the necessary requirements for legal entry into the receiving state. The key component in human smuggling is always the crossing of international borders, a requirement that does not apply in trafficking.

Trafficking as defined in the Palermo Protocol has as a legal concept no links at all to human smuggling or illegal migration. Trafficking concerns forced or fraudulent trade and exploitation of humans; whether an illegal crossing of international borders has taken place during this trade or exploitation is irrelevant. However, in everyday life, trafficking, human smuggling, and illegal migration are closely related and hard to distinguish.

Distinguishing the two phenomena not only has theoretical interest but is of utmost importance in terms of the rights of the individuals involved. The definition of an act as smuggling or as trafficking has a direct effect on the situation of the objects of the action. In trafficking in persons, the objects are treated as victims of crime and often are entitled to various special protective measures. In human smuggling, the objects are usually treated as accomplices in crime, or at least as illegal immigrants, and their legal status is considerably weaker (Pärsinen 2003, pp. 13–15).

In principle, human smuggling is always based on free mutual consent of the parties; trafficking, by contrast, is based on fraud, force, or coercion. In the “Trafficking in Persons Report” of 2004 of the U.S. State Department, this is seen as the distinction between trafficking and smuggling. According to the report, victims of trafficking may have initially consented, but their consent has been negated (i.e., should be seen as negated) by the coercive, deceptive, or abusive actions of the traffickers. It may be questioned how clear a definition this is when

applied to everyday smuggling and trafficking. It is often difficult to find out whether the persons involved have consented and to what they have consented. In practice, fraud and coercion, at least to some degree, are involved in almost all human smuggling actions.

A clearer distinguishing element between trafficking and human smuggling is the trafficker's purpose of exploitation in the destination country; this is always an elementary part of trafficking but should be lacking in human smuggling. Although many smuggled migrants end up in exploitative situations, if the future exploitation is implied in the process of smuggling, the activity should always be considered as human trafficking. If there exists no evidence of such a purpose, it may be mere human smuggling (Pärssinen 2003, pp. 13–15; "Trafficking in Persons Report" 2004, p. 18).

According to the current stipulations of the United Nation, the United States, and the European Union, the mere facilitation of illegal entry into or through a country is never trafficking, even though it be undertaken in dangerous or degrading conditions, if the smuggled persons have consented, and if a purpose of exploitation is lacking.

D. Victims and Victim Protection

International legislation concerning the rights and legal status of victims of trafficking was for a long time substantially different in the activities covered by the antislavery treaties and in those coming under the antiprostitution treaties.

The antislavery treaties included almost no general victim protection stipulations. The only provision that could be seen as such was article 4 of the 1956 convention, which stated that any slave taking refuge on board any vessel of the signatory states was ipso facto free. However, as slave trade, slavery, and related forms of servitude were criminalized, the objects of the activities usually had the full rights and status of a victim of crime in national courts and authorities.

The number of victim protection mechanisms in the antiprostitution treaties was substantially larger. The 1904 convention included two such stipulations. In article 3 the signatories were obliged to provide temporary protection for victims of white slave traffic, when such protection was not available from NGOs or private individuals. Article 4, again, included regulations concerning repatriation costs. The costs were to be shared between the country of origin and the country of

residence (if the repatriated prostitute or her relatives could not pay the costs themselves).

In the 1949 convention, victim protection provisions were greatly increased. Article 5 guaranteed foreigners and nationals equal rights in the courts and in the authorities as injured parties. Article 6 obliged the signatories to repeal or abolish laws, regulations, or administrative provisions that subjected prostitutes to special registration or other special requirements for supervision or notification. Significant, at least in principle, was a stipulation in article 16 that obliged the signatories not only to general prevention of prostitution but also to rehabilitation and social adjustment of the victims of prostitution and related trafficking. The stipulation was, however, only a declaration of principle that did not give rise to concrete obligations. The stipulations of the 1904 convention (concerning the temporary care and maintenance of the victims before repatriation and the sharing of the repatriation costs) were included in article 19:

Article 19. The Parties to the present Convention undertake, in accordance with the conditions laid down by domestic law without prejudice to prosecution or other action for violations thereunder and so far as possible:

1. Pending the completion of arrangements for the repatriation of destitute victims of international traffic in persons for the purpose of prostitution, to make suitable provision for their temporary care and maintenance;
2. To repatriate persons referred to in article 18 [alien prostitutes] who desire to be repatriated or who may be claimed by persons exercising authority over them or whose expulsion is ordered in conformity with the law. Repatriation shall take place only after agreement is reached with the State of destination as to identity and nationality as well as to the place and date of arrival at frontiers. Each Party to the present Convention shall facilitate the passage of such persons through its territory.

Where the persons referred to in the preceding paragraph cannot themselves repay the cost of repatriation and have neither spouse, relatives nor guardian to pay for them, the cost of repatriation as far as the nearest frontier or port of embarkation or airport in the direction of the State of origin shall be borne by the State where they are in residence, and the cost of the remainder of the journey shall be borne by the State of origin.

The main objective was the security and well-being of the state,

society, and law-abiding citizens (their protection from costs caused by international prostitution). The needs of victims of trafficking came second. However, the main problem (considering the rights of the victims) was that there were very few injured parties in the activities regulated and criminalized by the treaties who could enjoy the guaranteed rights. Most of the crimes (e.g., pandering) defined by the 1949 convention and its predecessors were crimes against the state. Although the aim of the treaty system created in 1904–49 was to a large extent to protect women against prostitution and related trafficking, the legal status of those engaged in prostitution and those who were victims of related trafficking was left mostly undefined, and the victim protection stipulations could not replace this major defect. Consequently, the status of the objects of pandering and other forms of exploitation of prostitution was much weaker than that of the victims of slavery or the slave trade. As the treaties criminalized only the supportive services of prostitution but did not take any clear stand on prostitution itself, neither legalizing nor criminalizing it, they contributed to creating and maintaining a legal limbo for prostitution and prostitutes in many countries and consequently facilitated the exploitation of persons engaged in prostitution.

The Palermo Protocol and the consequent shift to consideration of trafficking in the context of combating and prevention of organized crime has standardized the legal status of the victims of different forms of trafficking and has substantially improved the situation concerning the victims of prostitution-related trafficking, at least in principle. The protocol is the first international treaty concerning trafficking that includes extensive victim protection mechanisms.

The victims are guaranteed not only the full legal status and rights of a victim of crime in the courts and authorities of the signatory states, but article 7 also includes stipulations that aim to improve victims' chances of obtaining residence permits in the country to which they have been trafficked.

Under article 6, victims are entitled to the protection of their physical safety and privacy; adequate legal assistance and counseling; interpreting services; appropriate housing; medical, psychological, and material assistance; employment; and educational and training opportunities. In application of the rights, the age, gender, and special needs of the victims must be taken into account. Article 8 regulates procedures and conditions of repatriation of victims. Although the frame-

work remains state-centered, the needs of victims are in a more central position than in the prostitution treaties of 1904–49. Repatriation must take place with due regard to the safety of the victim and preferably be voluntary.

The Palermo Protocol has been criticized because the aim of abolition of prostitution in the 1904–49 treaties has been replaced by the prohibition only of forced prostitution (Niemi-Kiesiläinen 2004, p. 455). This is no doubt true, but when considered from the perspective of the status and the rights of victims, the protocol represents substantial improvement. Victims whom the antiprostitution treaties dealt with as vague “victims of conditions” with no defined legal rights have obtained a defined legal status as victims of crime with consequent legal rights.

This does not mean that the situation in individual countries and their legislation is satisfactory. Enactment of the provisions of the Palermo Protocol in national legislation remains incomplete in several signatories, and obligations imposed by the treaty have been interpreted in diverse ways, often very narrowly. It is to be hoped that efforts will continue to define more explicitly the legal status of prostitution and persons engaged in it and to clarify the present indeterminate state of affairs in many countries.

E. The Diverse Definitions of Trafficking in Persons

The international treaties, and the U.S. and E.U. legislation, today define trafficking in persons almost identically. This is not surprising because current U.S. and E.U. legislation are, to a large extent, based on the Palermo Protocol. The crime of trafficking in persons, whether prostitution-related or not, comprises three elements, all of which are crucial: the act of the perpetrator, how the act is committed, and the purpose of exploitation. If any element is missing, the activity is not trafficking.

The situation is not equally clear in scientific or social debate, since different organizations, individuals, and scholars have preferences of their own and laudable enthusiasm to develop their own concepts and definitions.²⁴ For example, only activities crossing international borders are regarded as trafficking by some researchers and NGOs, whereas all forms of organized prostitution are included in the phenomenon by

²⁴ See, e.g., the recent article by Kleimenov and Shamkov (2004), which includes altogether three substantially differing definitions, all different from the Palermo definition.

others (Kleimenov and Shamkov 2004). The diverse uses of the concept are due to the heterogeneity of the phenomenon itself; definitions depend on the dimensions of the phenomenon under consideration and the context. It is probably impossible to create a definition of trafficking in persons that satisfactorily encapsulates all its aspects.

The current definition in international legislation is criticized mainly for concentrating too much on pre-exploitation activities and for not addressing the outcome of the trafficking (the situation the victim is placed into) or the abuses victims experience (IOM 2004, p. 10). For example, the Bangladesh report of the IOM interprets "for the purpose of exploitation" in the definition of the Palermo Protocol to exclude the actual exploitation process itself and thus leads to a focus on recruitment, movement, and transport at the expense of the exploitation phase.

To change this, it proposes a new paradigm that addresses the phenomenon from the perspective of the harm caused by trafficking itself. The factors that should be incorporated are loss of control (whether a person can leave the situation if he or she wishes to), third-party involvement (are third parties benefiting or participating in placing or maintaining a person in an exploitative situation?), commercial nature (the exploitation must produce some kind of commercial gains for a third party), time (trafficking usually has a clear beginning and ending), violation of human rights and national laws, and mobility (within or across borders) (IOM 2004, pp. 10, 23–27).

The definition in the Palermo Protocol has its own defects, nor is it ideologically acceptable to everyone. However, to make it possible to study, discuss, and combat trafficking in persons internationally, a homogeneous, clear, and short definition is needed. The definition in the Palermo Protocol is the best solution so far.

IV. Numbers and Geography

There are several ways to measure the volume of trafficking in women, the most common being numbers of victims and financial amounts involved. As hard data about victims are scarce, most estimates are based on either reported crimes or the number of active prostitutes. In the first case, there usually exists some link to reality even if police information in many countries suffers from reliability problems. In the latter case, estimates are often based only on other estimates. When

the number of reported crimes is used as the base figure, it is typically multiplied by a factor correcting for the dark number of unknown and unreported crimes, which is often purely theoretical (80 or 90 percent of cases missing seems to be the most common assumption). When the estimates are based on the number of people engaged in prostitution, the methods are more varied. Some are based on the assumption that the percentage of prostitutes who are victims of trafficking is the same all over the world. Others treat all migrant and underage prostitutes as victims and add a suitable percentage of domestic adult prostitutes to the total (see, e.g., Aromaa 2005, p. 9; Poulin 2005).

The economic aspects of the crime are usually measured as total turnover or total profits in the local or some other currency, or as a percentage of gross domestic product. These estimates are normally based on scattered national information on the profits per victim of separate trafficking or pandering operations, multiplied by the estimated annual total number of the victims (see Jahic and Finckenauer 2005, p. 29).

Here we discuss mainly information concerning the numbers of victims. This information is more abundant than that on economic aspects of trafficking, but it is also the basis for most of the economic volume calculations. Thus the problems of the victim estimates are usually multiplied in the latter.

In spite of the difficulties, it is not impossible to measure the volume of global trafficking. This would require, however, considerable basic research work in all the major nation-states involved. A good example of how this kind of research could be carried out is provided by Kelly and Regan (2000) for the United Kingdom; they combined diverse data from police, NGOs, media, immigration, and other sources (pp. 6–8, 16–22). Similar projects have been carried out in Spain and Italy (Mon-Eu-Traf 2002).

A. Global Volume

Estimates of the number of people trafficked each year worldwide for sexual or economic exploitation vary between 600,000 and more than 4 million (Flam 2003; “Trafficking in Persons Report” 2004, pp. 46, 54). Table 1 shows recent estimates, drawn from a wide range of sources that we discuss in this section.

The U.S. State Department estimates that 600,000–800,000 persons are trafficked across international borders annually, 80 percent of

TABLE 1
Global Trafficking Volumes for Sexual Exploitation, Prostitution

Area Given Assistance	Identified Victims in Reported Crimes or Assisted by NGOs/ Authorities (Year)	Estimated Number					Child Prostitutes
		Victims Trafficked within Region (Year)	Victims Trafficked to/through Region (Year)	Victims Trafficked from Region (Year)	People Engaged in Prostitution, Region		
Nordic	0-50	0	100-1,000	0	<10,000	<100	
Baltic	50-500	1,000-10,000	1,000-10,000	1,000-10,000	<25,000	>1,000	
Western Europe	3,000-5,000		50,000-100,000		260,000-500,000	>20,000	
Central Europe	500-2,000		100,000*		60,000-70,000	<5,000	
Balkans	1,500-2,000		>70,000	200,000*	>200,000	>60,000	
Mediterranean			10,000-50,000		100,000-140,000	>5,000	
Eastern Europe	>300			5,000-100,000	>200,000	>100,000	

North America					
Central America		50,000–120,000		>1,000,000	200,000
Caribbean				>100,000	>10,000
South America				>300,000	>30,000
East Asia	10,000–20,000 ^b		>110,000	<10,000,000	<3,000,000
Southeast Asia	10,000–20,000 ^c			>3,000,000	>1,000,000
South Asia	300,000–2,000,000 ^b			>2,500,000	>1,000,000
Central Asia	300,000–1,500,000 ^b			<10,000,000	<3,000,000
Middle East	200,000–3,000,000 ^b			>10,000	
Oceania	250,000–500,000 ^b		1,000–15,000 ^a	>20,000	
North Africa		10,000–50,000 ^b		>30,000	5,000
West Africa		<10,000		>500,000	<100,000
Central Africa		>10,000 ^b	50,000–100,000 ^b	>500,000	>100,000
East Africa			10,000–100,000 ^b	>500,000	>100,000
Southern Africa			10,000–50,000 ^b	>500,000	>50,000
	50,000–100,000 ^b			>500,000	>100,000

^a Trafficked through and out.

^b Trafficked within, to, through, and out.

^c Trafficked within, to, and through.

whom are women and 50 percent children. The number of female victims would thus be 400,000–650,000 each year. The IOM gives a fairly similar figure: 700,000 women and children trafficked across international borders annually. Both estimates include all forms of trafficking (IOM 2001a; “Trafficking in Persons Report” 2004, pp. 46, 53). If we use the data from Europe and Asia, according to which 70–90 percent of female and child victims are trafficked for sexual exploitation, as the basis for global estimates, the annual maximum volume of this kind of trafficking would be between 500,000 and 650,000. This does not include intraborder trafficking.

The U.S. State Department estimates 2 million to 4 million people are victims each year in global domestic trafficking. Under the assumption that the percentage of victims of prostitution-related trafficking is the same as in the cross-border traffic, this would mean 1 million to 3 million victims annually. The total number of victims of prostitution-related trafficking would thus be 1.5 and 3.7 million a year. According to the IOM, the number of women trafficked annually for prostitution to and within Europe only is about 500,000 (“Trafficking in Persons Report” 2004, pp. 46, 54).

The estimates are fairly high if compared with similar estimates of the number of migrant prostitutes in the world, which vary between 500,000 and 800,000 (De Tapia 2003, p. 29). They are fairly low, however, compared with estimates of the number of child prostitutes around the world (according to the Palermo definitions, most child prostitutes fulfill the criteria of victims of trafficking). The number of minors in prostitution in Europe and North America (where the estimates can be considered fairly reliable) is about 400,000.

According to the national and regional estimates referred to in the following pages, the annual volume of trafficking for sexual exploitation would be several millions. The number of minors engaged in organized child prostitution around the world according to these estimates is somewhere between 5 and 10 million.

A major problem when analyzing the existing estimates is not only that neither the definition of trafficking nor the sources of data that have been used are usually mentioned, but it is also rarely said to what the figures actually refer. Do they refer to persons or border crossings? Do they comprise only those trafficked across international borders or also the victims trafficked within countries? Do they include only new recruits or also victims of earlier years whose exploitation continues?

There are additional problems with regional estimates. The same persons in principle can and even should appear in the estimates of several countries at the same time. For example, a victim abducted in Ukraine and transferred through the Balkan route to Belgium in theory should be included in the figures of six to ten countries and, thus, would appear as six to ten victims in joint European statistics (which do not exist). A victim can also appear several times in the estimates of a single country. For example, a foreigner who is trafficked into a country, exploited there in several different towns, and then again trafficked out of the country should be counted in the statistics of those trafficked into, out of, and within that single country and thus count as at least three different victims. Considering these problems, only data concerning native victims trafficked out of and within each country should be used as the basis of the international estimates. This rule, however, is impossible to apply. For many countries, only estimates concerning the aggregate numbers of victims are available, the use of which (even considering their gaps) inevitably inflates regional and global numbers. The fact is that currently there exist no data to serve as bases for reliable estimates on the global volume of prostitution-related trafficking (defined on the basis of the Palermo criteria).

According to the minimum figures in table 1 concerning people trafficked out of or within each region, the estimated numbers of victims are 300,000 for Europe and Russia, 50,000 for North America, 500,000 for East Asia, 250,000 for South Asia, 200,000 for Southeast Asia, 300,000 for Latin America, and 120,000 for Africa, making together 1.7 million people. The corresponding number of persons trafficked out of the major geographical regions is about 400,000.²⁵

These figures correspond fairly well with those given by the U.S. State Department: 1.5 million as the annual minimum figure for the victims of global cross- and intraborder trafficking and 500,000 for cross-border trafficking only ("Trafficking in Persons Report" 2004, pp. 53–54). This, however, says nothing of their reliability: the figures correspond mainly because the sources have probably been to a large extent the same.

The World Bank recently reported the global total of legal immigrants and refugees in the early 1980s to be about 100 million and to

²⁵ According to these figures the victim rates per 100,000 population would be Europe and Russia, 37; North America, 15; East Asia, 34; Southeast Asia, 39; South Asia, 19; Latin America, 73; and Africa, 15.

have increased considerably since then (Russell 2005, pp. 2–3). The IOM estimates the current global volume of labor migration at about 150 million (*Labour Migration* 2005). A Council of Europe report estimates the global number of irregular immigrants as over 30 million (De Tapia 2003, p. 29). For the annual volume of human smuggling, Babha (2005) estimates some 800,000 (his sources are not indicated). All these estimates, referring either to the total volume of migrants at a given time or to annual migration flows, are as hazy as those concerning the estimates of trafficking. They are, however, as a rule much more moderate. The minimum estimate referred to above of 400,000–500,000 victims of prostitution-related cross-border trafficking annually, compared with the estimates concerning the annual flows of irregular migration, suggests that the bulk of irregular migration in the world consists of prostitution-related trafficking. As this cannot be true, either the current estimates concerning global irregular migration are much too low or those concerning global prostitution-related cross-border trafficking are much too high.

The regional estimates in the following pages suggest that about 30 million people are engaged in prostitution around the world. This estimate should be treated with caution because in some countries the figures we use refer to registered prostitutes, in other countries to estimated professional prostitutes, and in yet other countries to the joint number of professional and part-time prostitutes. For countries for which official or NGO estimates have not been available, we have estimated the number on the basis of the numbers of professional prostitutes given for neighboring countries and the total population. If the estimate of 30 million is, however, more or less right, the minimum estimate of 1.7 million victims of prostitution-related trafficking would make up about 6 percent of the total of people engaged in prostitution around the world. Many of the national estimates do not include domestic organized child prostitution and also omit victims trafficked in earlier years whose exploitation is continuing, so the real minimum estimate is very likely higher than 1.7 million. Maybe even the U.S. State Department maximum of 3.7 million is not high enough. This means that as many as 10–15 percent of those involved in prostitution globally are victims of trafficking—an average percentage not too unlikely, even if large fluctuations across regions may be observed.

In the following pages we try to give the most recent figures and estimates concerning the annual minimum and maximum numbers of

victims of trafficking, people engaged in prostitution, and children engaged in prostitution from each major geographic area and compare them with the estimates given by the international organizations. The estimates have been collected mainly from the Web sites of global-march and protectionproject and from the IOM and Mon-Eu-Traf reports. One should treat all these figures with caution.

B. Europe and Russia

The highest estimates of prostitution-related trafficking in Europe come from Human Rights Watch, the Swedish NGO "Kvinna till kvinna," and from Maltzahn in the Australian Women Conference (2001) (it is probable that they all are based on a common unmentioned source), which give 500,000 women and children as the annual volume of trafficking *to the E.U. old member countries* (E.U. 15) (or, alternatively, to "western Europe"). According to the latest IOM estimate, the volume of trafficking *to and within the whole continent* is 500,000 annually (whether this is based on the same source as those above is not clear, but it is significantly more moderate, since it also includes the countries outside the pre-2004 E.U. borders). Trafficking to the European Union²⁶ from and through the Balkans would be 120,000 women and children a year, and from the whole of eastern Europe about 200,000 women and children. According to the latest estimate of the U.S. Drug Enforcement Administration (DEA), 200,000 women and children are trafficked through the Balkans each year (a figure fairly similar to that of IOM) (*Organized Crime Situation Report* 2001, p. 41; Hajdinjak 2002, p. 51; Laczko, Klekowski von Koppenfels, and Barthel 2002, p. 4; "Trafficking in Persons Report" 2004, p. 46; *Trafficking of Nigerian Girls to Italy* 2004; fpmail.friends-partners.org; www.janes.com; www1.umn.edu/humanrts/usdocs).

The volume of trafficking for prostitution has been increasing in Europe for the last fifteen years. Table 2 presents recent estimates, drawn from sources discussed in this subsection. The demand for prostitution and other sexual services has been increasing in western Europe, and the former socialist countries in central and eastern Europe with their current economic and social problems offer a source area from which trafficking to western Europe can be organized far more easily and more economically than from the old source areas (Southeast

²⁶ These estimates refer to the pre-2004 member countries only.

TABLE 2
Estimates, Trafficking for Sexual Exploitation, Prostitution, Europe

Country	Role	Full-Time Prostitutes	Foreign Prostitutes	Annual Trafficking Victims	Proportion European Victims
Albania	s, t	?	?	>10,000	Majority
Armenia	s, t	?	?	500–700	Majority
Austria	d, t	6,000–12,000	5,000–10,000	?	80–90%
Azerbaijan	s, t	?	?	?	Majority
Belarus	s, t	?	?	?	Majority
Belgium	d	30,000	>15,000	1,000–3,000	>50%
Bosnia	d, s, t	15,000	10,000	>10,000	Majority
Bulgaria	s, t	?	?	3,000–4,000	Majority
Croatia	t	?	?	100–200	90–100%
Czech Republic	d, s, t	?	?	>100	Majority
Denmark	d	6,000	2,000	10–50	90–100%
Eire	d, t	?	>10%	?	Majority
Estonia	s	2,000–5,000	<1,000	?	100%
Finland	d	3,000–7,000	3,000–6,000	10–100	100%
France	d	20,000–40,000	12,000–25,000	?	Majority
Georgia	s, t	?	?	Thousands	Majority
Germany	d	60,000–300,000	30,000–150,000	2,000–20,000	80%
Great Britain	d, t	80,000	20,000	1,500	>50%
Greece	d, t	>20,000	16,000–20,000	<40,000	90%
Hungary	d, s, t	10,000	3,000–4,000	?	Majority
Iceland	d	<500	<500	A few	Significant part
Italy	d, t	50,000–70,000	30,000–40,000	2,500–5,500	Majority
Kosovo	d, s, t	Thousands	Thousands	<30,000	Majority
Latvia	s	2,500–9,000	?	<1,500	100%
Lithuania	s	3,000–10,000	500–3,000	<10,000	100%
Luxemburg	d	300	300	<300	?
Macedonia	d, s, t	>2,500	1,500–2,500	8,000–18,000	90–100%
Moldova	s, t	?	?	>10,000	Majority
Netherlands	d	20,000–30,000	13,000–20,000	1,000–3,000	>50%
Norway	d	3,000	600–1,000	10–50	90–100%
Poland	d, s, t	30,000–35,000	>15,000	>15,000	Majority
Portugal	d, t	Lisbon 6,500	Half	Thousands	Significant part
Romania	s, t	?	?	>10,000	90–100%
Russia	d, s, t	?	Thousands	10,000–100,000	Majority
Serbia and Montenegro	d, s, t	?	?	Thousands	Majority
Slovakia	s, t	?	?	>25	Majority
Slovenia	t	?	?	?	Majority
Spain	d, t	45,000	>27,000	4,000–8,500	20%
Sweden	d	1,200–2,500	200–700	10–100	90–100%
Switzerland	d	7,000–8,000	2,000–4,000	?	<50%

TABLE 2 (*Continued*)

Country	Role	Full-Time Prostitutes	Foreign Prostitutes	Annual Trafficking Victims	Proportion European Victims
Turkey	d, t	?	>60,000	>1,000	Majority
Ukraine	s, t	?	?	10,000–100,000	Majority

NOTE.—d = destination, s = source, and t = transit.

Asia, West Africa, and Latin America). Estimates of the annual turnover vary from 100 million euros to several milliards of euros (*Organized Crime Situation Report* 2001, p. 41; Hajdinjak 2002, p. 51; fpmail.friends-partners.org).

The majority of victims come from Albania, Lithuania, Moldova, Romania, Russia, and Ukraine. Of the victims of coerced prostitution assisted by the IOM in the last few years, about half have been Moldovians, a quarter Romanians, and a tenth Ukrainian. Trafficking in women to Europe from other continents has significance mainly in the Mediterranean countries and in western Europe. The main source areas are Southeast Asia (Thailand), Latin America (Colombia, Brazil, and the Dominican Republic), and North and West Africa (Morocco, Nigeria, and Sierra Leone). According to Europol, the extent of this trade has remained about the same in recent years. The increase in Europe is due to trafficking from eastern Europe (*Organized Crime Situation Report* 2001, p. 41; fpmail.friends-partners.org/pipermail/stop-traffic).

Concerning trafficking in women, Europe is divided into two parts: the old member countries of the European Union serve as a destination area, and central Europe, the Balkans, and the Confederation of Independent States (CIS) countries serve as source and transit areas. Irregular immigration as a whole has six main routes to and inside Europe: from Moscow through Lithuania, Poland, or the Czech Republic to Germany and Austria; from Ukraine through Slovakia, Hungary, the Czech Republic, or Poland to Austria and Germany; from the Middle East and Turkey to Greece and Italy; from North Africa to Spain and Italy; from Turkey through the Balkans to Italy and Austria; and from South and Central America to Portugal and Spain. These routes also serve as the main routes of trafficking in persons (NCIS 2002, p. 34).

Tables 1 and 2 show the volume of victims of prostitution-related

trafficking and numbers of persons engaged in prostitution in the major geographic regions of Europe based on the latest data and estimates available in different European countries. The main sources are the reports of the IOM and STOP-project (Hollmen and Jyrkinen 1999; *A Study: Trafficking in Women* 2001; Laczko, Klekowski von Koppenfels, and Barthel 2002), and some national summaries (Mon-Eu-Traf 2002; Mon-Eu-Traf II 2004). The data mainly describe the situation in 1999–2001.

1. *Northern Europe (Denmark, Estonia, Finland, Iceland, Latvia, Lithuania, Norway, Sweden)*. Trafficking in northern Europe is regionally internal to a large extent. The main destination area is the Nordic countries: Denmark, Finland, Norway, and Sweden, the source area being the Baltic countries and northwestern Russia. A secondary destination area consists of the Baltic countries, to which women are trafficked from Russia, Ukraine, and other CIS countries. Prostitution from Lithuania and Latvia is mainly directed to Germany, Sweden, and Denmark; and prostitution from Estonia and northwestern Russia to Finland, northern Norway, and western Europe. A significant number of Baltic and Russian prostitutes are also active outside Europe in North America, the Middle East, and the Far East (*Kännedom om prostitution* 2000, pp. 27–29; *Norwegian Report on Anti-trafficking Activities* 2000; *Trafficking in Women* 2001, pp. 71, 110–11, 123–28, 210–26; *EU Organized Crime Report* 2002, pp. 45, 76; Lehti and Aromaa 2002, pp. 50–69; Moustgaard 2002, pp. 4–9; Leskinen 2003, pp. 9–28).

Prostitution from Russia and the Baltic countries to Scandinavia is mostly mobile; prostitutes come as tourists and work for a few days or a couple of weeks. Organization seems usually to be fairly loose. The recent entry of the Baltic countries into the European Union (and the consequent relaxing of border controls) has further loosened the grips of panderers of Baltic prostitution in Scandinavia (Kontula 2005, p. 39).

The volume of foreign prostitution in the Nordic countries increased rapidly in the 1990s, but the number of cases of coerced prostitution reported to the police remained almost nonexistent. The number of women from Russia and the Baltic countries who work in Nordic prostitution is estimated to be 5,000–10,000. The annual number of victims is probably a couple of hundred at the highest, although much higher figures have occasionally been referred to in public dis-

cussion. The low number of reported crimes and the overall loose organization of prostitution do not, however, support these claims.

Internal prostitution in the Baltic countries and northwestern Russia is likely to employ full-time 30,000–50,000 persons. The number involved in part-time prostitution is considerably higher. Most prostitutes working in the Nordic countries also work in prostitution in their home countries. No estimates are available of the number of victims of trafficking in the internal prostitution of the Baltic countries or northwestern Russia, but it is probably higher than in the Scandinavian countries (Lehti and Aromaa 2002, pp. 50–69; Lehti 2003, pp. 9–14; Leskinen 2003, pp. 13–14).

In all three Baltic countries, most workers in the sex business are natives, especially members of the Russian-speaking minority formed by immigrants of the Soviet era. The core of Baltic prostitutes in western Europe and Scandinavia consists of local professional prostitutes, whose numbers are estimated at 2,000–3,000 in Estonia, 2,500–9,000 in Latvia, and 3,000–10,000 in Lithuania. The number of foreign prostitutes is largest in Lithuania: 20–30 percent of all full-time prostitutes in the country. Most come from the Kaliningrad enclave of Russia, Ukraine, and Belarus. In Estonia and Latvia, the source areas are the same: Russia, Ukraine, and other CIS countries; the number of foreign prostitutes is estimated to be considerably smaller. Local prostitution, the import of foreign prostitutes, and the export of local prostitutes are partly controlled by organized crime in all three Baltic countries.

The number of minors in prostitution directed to the Nordic countries is almost nonexistent. In the Baltic countries and the St. Petersburg region the volume of underage prostitution is, however, considerable. The number is estimated to be hundreds in the Baltic countries and thousands in the St. Petersburg region. Their customers include many Scandinavian sex tourists (*Trafficking in Women* 2001, pp. 71, 110–11, 123–28, 210–26).

2. *Western Europe (Austria, the Benelux Countries, the British Isles, France, Germany, Liechtenstein, Monaco, Switzerland).* Western Europe is the most important destination area in Europe for prostitution-related trafficking. The victims come mainly from central Europe, the Balkans, the Baltic countries, and the CIS countries, but women and children are trafficked to the area from other continents (Latin America, Africa, and Southeast Asia), too. Table 3 shows recent estimates for selected countries.

TABLE 3
Trafficking Volumes, Source Areas, Western Europe

Country	Identified Victims Trafficked into Country, Reported Crimes (Year)	Estimated Annual Victims Trafficked into Country	Source Areas
Austria	150 (2000)	?	IE and CIS 81%; LA 10%; other 9%
Belgium	270 (2000)	1,000–3,000	IE 23%; CIS 21%; EU 1%; AF 26%; LA 8%; AS 20%
France	700–900 (2000–2003)	?	NT 23%; IE and CIS 43%; AF 27%
Germany	926 (2000)	2,000–20,000	IE 54%; CIS 28%; AF 3%; AS 5%; other 10%
Netherlands	289 (1999), 203 (2000)	3,500	IE 25%; CIS 17%; EU 7%; AF 28%; LA 5%; AS 10%; other 9%
United Kingdom	71 (1998)	142–1,420	IE and CIS 50%; AS 25%; AF and LA 25%

NOTE.—IE = new E.U. member countries and the Balkans; CIS = the CIS countries; EU = E.U. member countries; AF = Africa; LA = Latin America; AS = Asia; NT = native (source: Fijnaut et al. 1998; Laczko, Klekowski von Koppenfels, and Barthel 2002; Mon-Eu-Traf II 2004).

The number of identified victims in reported crimes or assisted annually by NGOs is 3,000–5,000. It is usually assumed that they make up only a small proportion of the total. When the estimates given by the national authorities of each individual country are added together, the annual total is at least 50,000–60,000. According to some international organizations (e.g., the IOM), it is considerably higher, even 100,000–150,000 women and children (Fijnaut et al. 1998, pp. 102–6; Hollmen and Jyrkinen 1999, pp. 12–15; Kelly and Regan 2000, pp. 18, 22; *Organised Crime Situation Report* 2001, p. 41; *Trafficking in Women* 2001, pp. 111, 226; *EU Organized Crime Report* 2002, pp. 38, 65; Laczko, Klekowski von Koppenfels, and Barthel 2002, pp. 9–13; NCIS 2002, pp. 38–39; Lehti 2003, pp. 15–20; Mon-Eu-Traf II 2004).

The number of people engaged in prostitution in the region is estimated to be 270,000–500,000, of whom over 20,000 are minors (www.globalmarch.org).

3. *Central Europe (the Czech Republic, Hungary, Poland, Slovakia, Slovenia).* The central European countries are an important transit

and secondary destination area from the Balkans and the CIS countries to western Europe. They also form a major source area for trafficking in women to Germany, Austria, the Netherlands, and Belgium (IOM 2000; Laczko, Klekowski von Koppenfels, and Barthel 2002, pp. 9–15; Travnickova 2004).

Data concerning the annual number of identified victims in reported crimes have been available only from Poland, Hungary, and the Czech Republic and mainly refer to cases, not individuals. However, when these figures are multiplied by the average numbers of victims in known cases mentioned in the literature, we get the following *annual* average numbers: Poland, 50–300; Hungary, 20–150; and the Czech Republic, 90–250. If we assume that the situation is more or less the same in Slovakia and Slovenia, this would mean 1,000–1,500 identified victims a year for the whole area (Travnickova 2004, p. 72; www.globalmarch.org).

According to the IOM, the annual volume of trafficking *from and through* central Europe is much higher, about 100,000 women and children. Poland is the main route between western Europe and eastern Europe, and a recent UNICRI report estimates the number of victims transported *through* the country to be as high as 50,000 annually. The number of women trafficked *from* central Europe has been decreasing over the course of the last decade (e.g., in the mid-1990s more than half of the foreign prostitutes assisted in Austria were from central Europe; the proportion more recently was only 15 percent). However, the volume of trafficking through the area and to the area has not decreased (Laczko, Klekowski von Koppenfels, and Barthel 2002, p. 13; Travnickova 2004, p. 39).

There are 30,000–35,000 active prostitutes in Poland, more than half of whom are foreigners. In Hungary, the number of prostitutes is estimated to be 10,000, a third of whom are foreigners, mainly Ukrainians, Russians, and Romanians. If the volume of prostitution in the Czech Republic, Slovakia, and Slovenia is about the same, there would be 60,000–70,000 people engaged in prostitution in the area (*Country Report of the Republic of Slovenia* 2000; Laczko, Klekowski von Koppenfels, and Barthel 2002, p. 9; www.globalmarch.org; www.undcp.org).

4. *The Balkans (Albania, Bosnia, Bulgaria, Croatia, Cyprus, Greece, Kosovo, Macedonia, Romania, Serbia and Montenegro, Turkey)*. In the 1990s, the Balkans became the main source and transit area for trafficking in women for sexual exploitation in Europe. The primary

source countries are Albania, Bulgaria, and Romania. Bosnia, Macedonia, Montenegro, Kosovo, Serbia, and Turkey are the key transit areas. The main destinations are Greece, Turkey, and the successor states of the former Yugoslavia. Most victims trafficked into and through the Balkans come from inside the area or from Ukraine, Moldova, and Russia. The main junctions of the trade are Belgrade, Budapest, Bucharest, and Istanbul (IOM 2001*b*, 2003*a*, pp. 9–18; *Organised Crime Situation Report* 2001, p. 41; Hajdinjak 2002, pp. 52–56).

It is not possible to give exact estimates in the Balkans for individual countries. According to the DEA, the total number of victims (trafficked into, through, and from the Balkans) is about 200,000. The number of identified victims assisted by NGOs between January 2000 and June 2003 according to the IOM was 4,072 (thus an average of 1,163 a year), about 70 percent of whom originated in the area. Most of the rest (29 percent) were from Moldova, Ukraine, Russia, or Belarus.²⁷ In Bosnia, there were 691 victims in reported crimes or assisted by NGOs in 1999–2003; their annual numbers varied between fourteen and 255, the majority (81 percent) being Moldovans or Romanians. However, according to IOM, it is not possible to assess even the minimum number of women trafficked from the area to the European Union, Russia, or elsewhere outside the Balkans because of the absence of consolidated data (IOM 2001*b*, 2003*a*, pp. 10–11; Maljevic 2005).

The number of Balkan prostitutes working abroad is estimated to be 250,000–800,000, the majority coming from Romania, Albania, and Kosovo (www.globalmarch.org).

The Balkans are also an important destination for trafficking in women. Bosnia, Kosovo, and Macedonia alone are estimated to have about 30,000 prostitutes, a considerable number of whom work in conditions that meet the criteria of coerced prostitution. A notable part of the customers (in Bosnia, about a fifth) consists of the personnel of the international peacekeeping operations. Other major destination countries are Greece, Serbia, and Turkey. The number of victims in Greece is estimated to be up to 40,000, although the annual numbers of identified victims in the last few years have been only a few hundred (Maljevic 2005; www.globalmarch.org).

5. *The Mediterranean Countries (Andorra, Italy, Malta, Portugal, San*

²⁷ The largest single groups were Albanians (43 percent), Moldovans (22 percent), Romanians (15 percent), Bulgarians (7 percent), Ukrainians (6 percent), and Kosovars (5 percent).

TABLE 4
Trafficking Volumes, Sources Areas, Southern Europe

Country	Identified Victims Trafficked into Country, Reported Crimes (Year)	Estimated Annual Victims Trafficked into Country	Source Areas
Italy	?	2,500–5,500	IE 28%; CIS 12%; AF 52%; LA 2%; other 7%
Portugal	?	?	LA and IE
Spain	?	4,000–8,500	LA 65%; IE and CIS 20%; AF 10%; EU 5%

NOTE.—IE = new E.U. member countries and the Balkans; CIS = the CIS countries; EU = E.U. member countries; AF = Africa; LA = Latin America (source: Laczko, Klekowski von Koppenfels, and Barthel 2002; Mon-Eu-Traf 2002, pp. 50–55; Mon-Eu-Traf II 2004).

Marino, Spain). The Mediterranean countries form a major destination and transit area. In the Iberian peninsula the majority of victims come from outside of Europe (the main source area is Latin America: Colombia, Brazil, and the Dominican Republic), and trafficking for prostitution is closely connected with drug trafficking. In Italy the main source area is eastern Europe, but the proportion of victims from other continents (especially from West Africa) is substantial (*Organised Crime Situation Report* 2001, p. 41; *Trafficking in Women* 2001, p. 70; Laczko, Klekowski von Koppenfels, and Barthel 2002, p. 14; Mon-Eu-Traf 2002, pp. 41–55; Mon-Eu-Traf II 2004). Table 4 shows recent estimates for the three large countries in the region.

Statistics concerning the number of identified victims are not available, but the annual volume into and through the Mediterranean countries is estimated at 10,000–50,000 women and children.

The number of people engaged in prostitution in the area is estimated to be between 100,000 and 140,000 (Spain, 45,000; Italy, 50,000–70,000; and Portugal, 10,000–20,000). The percentage of foreigners is about 60 percent in Spain and Italy and 50 percent in Portugal (www.globalmarch.org; www.portcult.com).

6. *Eastern Europe (Moldova, Ukraine, Belarus, Russia)*. Moldova, Ukraine, and Russia form one of the two main source areas for traf-

ficking in women to western Europe. The volume of Russian internal trafficking is significant, and from Russia and Ukraine great numbers of women are also recruited as prostitutes for markets outside Europe.

Recent estimates suggest that 50,000–100,000 Moldovans, over 100,000 Ukrainians, and as many as 500,000 Russians are active in international prostitution outside their home countries. Moreover, a considerable number of Russians not included in the above numbers take part in mobile prostitution in neighboring countries. The majority of Moldovan, Ukrainian, and Russian prostitutes work in Europe. Other major destinations are the Middle East, Southeast Asia, North America, China, and Japan (fpmail.friends-partners.org; Hollmen and Jyrkinen 1999, pp. 34–36, 42–43; *Organised Crime Situation Report* 2001, p. 41; www.globalmarch.org; www.uri.edu).

How many of the sex workers are victims of trafficking and coerced prostitution is impossible to estimate. The highest estimates are around 80 percent; however, Russian authorities believe that the majority of prostitutes who emigrate or work abroad do so voluntarily (Lehti 2003, p. 29; Leskinen 2003, pp. 9–28). According to the IOM, all estimates given by the authorities or the local NGOs should be treated with caution because they systematically exaggerate the problem. Trafficking in women for prostitution and prostitution are perceived as closely interrelated, and the two terms tend to be used interchangeably in the numbers received. Thus the numbers concerning “trafficking” in women often reflect the rapid expansion of prostitution as such, rather than actual trafficking activities, since networking is common and necessary to both (IOM 2000, 2003*b*).

Reliable data concerning identified victims have been available only from Moldova. The number of Moldovan victims assisted by the NGOs in the Balkans between January 2000 and June 2003 was 1,131 (thus a little over 300 a year). Applying the tenfold rule of the IOM would make about 3,000–4,000 victims a year, many fewer than the wildest estimates claiming tens of thousands of victims annually, but still a significant number for a country with a population of only a little over 4 million (IOM 2003*a*, p. 10).

7. *The Caucasus (Georgia, Armenia, Azerbaijan)*. The Caucasian countries are a major transit and source area for trafficking in women to the Middle East, Europe, and North America. The annual number of local victims is estimated to be several hundred. Armenian and Azerbaijani women normally end up as prostitutes or domestic servants

TABLE 5
Trafficking Volumes, Source Areas, North America

Country	Identified Victims Trafficked into Country, Reported Crimes (Year)	Estimated Annual Victims Trafficked into Country	Source Areas
Canada	?	8,000–16,000	AS; IE and CIS; LA
Mexico	?	?	
United States	?	14,500–50,000	IE and CIS; AS; LA

NOTE.—IE = new E.U. member countries and the Balkans; CIS = the CIS countries; LA = Latin America; AS = Asia; NT = native (www.globalmarch.org).

in Turkey or in the Persian Gulf states, whereas the destinations of the Georgian trafficking networks are more various (*A Study* 2001; www.rferl.org).

C. North and South America

The total volume of trafficking for sexual exploitation in the Americas is estimated at 400,000–2,500,000 victims annually. Most takes place inside or out of Brazil, other main source countries being the Dominican Republic and Colombia. The trafficking routes inside the Americas go mainly south to north, although a considerable proportion takes place in South and Central America and between neighboring states. Brazil and the Dominican Republic are main recruiting areas for migrant prostitution and prostitution-related trafficking for Europe and to a lesser extent for the sex industry centers in Asia, the Middle East, and South Africa.

1. *North America (Canada, Mexico, the United States)*. North America is a major destination and transit area, but there is also large-scale internal trafficking. Table 5 shows recent estimates. The main destination is the United States. According to official estimates, 14,500–50,000 people, primarily women and children, are trafficked to the country annually. These estimates have decreased substantially in recent years. There is also significant trafficking inside the country, and a small number of U.S. citizens are trafficked annually to Canada and Mexico. Canada is the other major destination area; the annual number of victims is estimated at 8,000–16,000. Canada is an important transit area and a minor source country for trafficking to the United States. The main source areas for trafficking to the United

States and Canada are eastern Europe (the Balkans, Russia, and Ukraine), East Asia (China), Southeast Asia (Thailand and the Philippines), and Latin America (Mexico, Brazil, Honduras, and the Dominican Republic) (www.globalmarch.org; "Trafficking in Persons Report" 2004, p. 54).

The situation in Mexico differs considerably from that in Canada and the United States. Although Mexico is also a major destination country (especially from Central America, China, and the Caribbean), it is a more important transit and source area. The main trafficking routes from eastern Europe, Latin America, and Asia to the United States go through Mexico, and Mexican women are trafficked in significant numbers to its northern neighbor. There have been no estimates available of the volume of trafficking into, from, or through Mexico, but the annual number of victims is probably over 10,000. The annual number of victims in the whole area is somewhere between 50,000 and 120,000 (www.globalmarch.org).

In Canada, an estimated 50,000–100,000 people are engaged in prostitution. In the United States, the North American Task Force on Prostitution suggests that over 1 million people work as part-time or professional prostitutes; the number of minors in prostitution is estimated to be 100,000 at least. The number of prostitutes in Mexico is believed to be larger than in Canada and smaller than in the United States (archives.econ.utah.edu/archives/marxism/2004w28/msg00164.htm).

2. *Central America.* Central America is a transit, source, and destination area. Table 6 shows recent estimates. Most takes place between and within the Central American countries. The main destinations outside the area are Mexico and the United States. The major source countries are Guatemala and Honduras (GPAT 2005, p. 6).

The minimum number of victims is estimated to be about 2,000 for each country except Belize and Costa Rica. Trafficking in Belize seems to be very rare. Costa Rica is mainly a destination for trafficking from eastern Europe and Southeast Asia (serving the European and North American sex tourism in the country), and the number of victims is estimated to be smaller than that in the neighboring countries. The total of annual victims is probably between 10,000 and 20,000. The number of people engaged in prostitution in the area is substantially higher (www.globalmarch.org).

3. *The Caribbean (Antigua-Barbuda, Bahamas, Barbados, Cuba, Dominica, the Dominican Republic, Grenada, Haiti, Jamaica, Puerto Rico, St.*

TABLE 6
Trafficking Volumes, Source Areas, Central America

Country	Identified Victims Trafficked into Country, Reported Crimes (Year)	Estimated Annual Victims Trafficked into Country	Source Areas
Belize	?	<100	LA
Costa Rica	?	100–500	LA; IE and CIS; AS
El Salvador	?	>2,000	LA
Guatemala	?	>2,000	LA
Honduras	?	>2,500	LA
Nicaragua	?	?	LA
Panama	?	?	?

NOTE.—IE = new E.U. member countries and the Balkans; CIS = the CIS countries; LA = Latin America; AS = Asia (www.globalmarch.org).

Kitts and Nevis, St. Lucia, St. Vincent, Trinidad and Tobago). From the Caribbean region, information is available only for the major islands and states. The Dominican Republic is the main source country and also one of the major source areas for the whole world. At least 50,000 women from the Dominican Republic are estimated to be engaged in the sex industry overseas. How many are victims of trafficking is not known, but the number is not insignificant. The main concentrations are in western and southern Europe and in the Caribbean area, but Dominican women are also engaged in prostitution in South America (Argentina), the Middle East (Israel), and the United States. A large-scale domestic sex industry serves European and North American sex tourism. It is estimated that more than 25,000 minors and a much higher number of adults are involved in prostitution in the Dominican Republic (Ehrenreich and Hochschild 2003; www.globalmarch.org).

Other major destinations of large-scale sex tourism (and thus also main destinations for trafficking) are Cuba (with about 100,000–160,000 prostitutes) and Jamaica (at least the same number). Many prostitutes are minors, both girls and boys (archives.econ.utah.edu/archives/marxism/2004w28/msg00164.htm).

The annual number of victims of prostitution-related trafficking in the area is probably about the same as in the Central American countries, 10,000–20,000.

4. *South America (Argentina, Bolivia, Brazil, Chile, Colombia, Ecuador, Guyana, Paraguay, Peru, Surinam, Uruguay, Venezuela)*. South Amer-

ica is a major source area, but also a destination and transit area. According to the United Nations, Brazil is the largest exporter of women in South America and one of the most important globally. Brazil is also a major destination country, and there is large-scale trafficking for prostitution within the country. The majority of victims trafficked from Brazil end up in the commercial sex industry in Europe (Germany, Italy, Portugal, and Spain), Japan, Israel, and the United States. According to the United Nations and the Helsinki International Federation of Human Rights, the number of Brazilians forced into prostitution within the boundaries of the European Union²⁸ is about 75,000 (it is not clear if these estimates refer to annual new recruits or to a cumulative total, presumably the latter). Most victims come from the states of Goiás, Rio de Janeiro, and São Paulo. Brazil has one of the worst child prostitution problems in the world and is a favored destination for sex tourists from Europe and North America. NGOs estimate that every year between 200,000 and 2 million women and children are trafficked *within* the country or *to* the country for the sex tourism business only. The main centers of sex tourism are the cities along the northeastern coast (www.protectionproject.org/human_rights/countryreport/brazil.htm).

Another major source country is Colombia, whose citizens are trafficked mainly to Asia (Japan, Singapore, and Hong Kong), western Europe (Britain, Belgium, Germany, the Netherlands, and Spain), and the United States. There is also large-scale trafficking within the country and to its neighbors. The annual number of repatriated victims has been around 100 in recent years. Estimates of the total annual volume are much higher: 20,000–35,000 at the lowest. Lesser source areas for prostitution-related trafficking in the region are Bolivia, Ecuador, Guyana, and Uruguay (www.globalmarch.org).

The other major destination for trafficking is Argentina, whose sex industry imports prostitutes from the neighboring countries (Chile, Bolivia, and Brazil) and from the Caribbean (the Dominican Republic). Lesser destinations for intraregional trafficking are Surinam and Venezuela. Chile is mainly a transit country for trafficking from Asia to South and North America (www.globalmarch.org).

If the estimates concerning each country are summed up, the total of annual victims is between 300,000 and 3 million, most of whom are

²⁸ The estimates were made before the 2004 enlargement of the European Union and refer to the old member countries only.

victims of trafficking inside Brazil. The real figure is probably nearer the minimum end estimates.

D. Asia and Oceania

The total volume of trafficking for sexual exploitation within, to, and out of Asia is estimated to be somewhere between 500,000 and 5 million. The United Nations Children's Fund (UNICEF) estimates that trafficking of women and children in Asia for sexual exploitation has victimized over 30 million people in the past thirty years, which would mean more than 1 million per year (Flam 2003).

The continent (excluding Russia) is divided into three main regions: the Middle East, South Asia, and the Asian Pacific Rim (East and Southeast Asia and Oceania). The Middle East imports commercial sex workers from all over the world, mainly from eastern Europe, central Asia, South Asia, Southeast Asia, and East Africa. Prostitution-related trafficking to the region mainly takes place from the same source areas. In South Asia and the Asian Pacific Rim region, trafficking for sexual exploitation is mainly internal: the main destinations and source areas are found inside the regions, and most countries in both regions act simultaneously as source, destination, and transit areas. Both regions are major sources for international long-distance trafficking. South Asia supplies commercial sex workers to Europe, the Middle East, and North America and the Asian Pacific Rim region to all over the world. The Pacific Rim region also imports commercial sex workers in large numbers from all over the world, especially from Russia, eastern Europe, and the Balkans. The main centers of long-distance trafficking are Sri Lanka, Thailand, the Philippines, and China.

The total profits of the trade in the area are estimated to be between US\$6 billion and \$7 billion annually (Flam 2003).

1. *East Asia (China, Hong Kong, Japan, the Koreas, Macao, Mongolia, Taiwan).* East Asia is an important source, destination, and transit area, and large-scale trafficking exists within the area. Table 7 shows recent estimates. The major key point is China. It is estimated that annually about 250,000 women are trafficked *within* the country for prostitution and about the same number *out of* the country. The main destinations outside China for Chinese women are Southeast Asia, North and Latin America, and Europe, but the trafficking networks cover the whole world. Large numbers of foreign women are trafficked each year to the sex industry in China, many from Burma, Vietnam,

TABLE 7
Estimated Trafficking Volumes, Source Areas, East Asia

Country	Annual Victims Trafficked within Country	Annual Victims Trafficked to/through Country	Annual Victims Trafficked from Country	Source Areas
China	250,000	>15,000	50,000–250,000	AS; CIS
Hong Kong		1–100*		AS; CIS
Macao				AS; CIS
Japan		50,000–250,000		AS; CIS
Mongolia				
North Korea				
South Korea		>1,000	>100	AS
Taiwan				AS; IE and CIS

NOTE.—IE = the new E.U. member countries and the Balkans; CIS = the CIS countries; EU = the E.U. member countries; AF = Africa; LA = Latin America; AS = Asia; NT = native (www.globalmarch.org).

* Annual number of cases reported to the police in 1990–99 (www.hku.hk/ccpl/pub/occasionalpapers/paper3/paper3-part5.htm).

and Russia, and ethnic Chinese from Southeast Asia. Russian authorities estimate that about 15,000 Russians are engaged in prostitution in China (Erokhina 2004; www.globalmarch.org).

Other source areas for prostitution-related trafficking in the region are Mongolia, Taiwan, and the Koreans. Mongolian women are trafficked mainly to Russia and Korean women to China. Taiwanese women are trafficked to the sex markets in Thailand and Malaysia. Aboriginal Malayo-Polynesians make up a large percentage of the victims (www.globalmarch.org).

Besides China, the other main destination is Japan. The annual number of victims is estimated at between 50,000 and 250,000, most from the Philippines, Thailand, and Russia. Hong Kong, Macao, Taiwan, and the Republic of Korea are lesser destination areas. Hong Kong is a major transit point for trafficking to Europe and North America (www.globalmarch.org).

The annual total of victims in the region (according to the above estimates) would be somewhere between 300,000 and 1.5 million.

According to official estimates, some 1 million women and children are engaged in prostitution in China (www.indianngos.com/issue/child/sexual/statistics/statistics11.htm). However, other estimates give 200,000–600,000 for the number of children involved in

TABLE 8
Estimated Trafficking Volume, Source Areas, Southeast Asia

Country	Annual Victims Trafficked within Country	Annual Victims Trafficked to/ through Country	Annual Victims Trafficked from Country	Source Areas
Brunei				Philippines
Burma		>1,000	10,000–50,000	China
Cambodia		>3,000	10,000–15,000	Vietnam
East Timor				Indonesia
Indonesia			500–1,000,000	AS
Malaysia		>3,000	4,000	AS
Philippines	>60,000		50,000–150,000	
Thailand		200,000–1,000,000	200,000–1,000,000	AS; IE and CIS
Vietnam			3,000	

NOTE.—IE = new E.U. member countries and the Balkans; CIS = the CIS countries; countries; AS = Asia (www.globalmarch.org).

prostitution only (www.unicef.org/vietnam/childse.pdf). The total number of persons engaged in prostitution is probably several millions. In Japan, the number of professional and part-time prostitutes is estimated to be somewhere between 500,000 and 1 million. The number of prostitutes in the Republic of Korea is also hundreds of thousands. In the other countries of the region the numbers are smaller (www.globalmarch.org).

2. *Southeast Asia (Brunei, Burma, Cambodia, East Timor, Indonesia, Laos, Malaysia, the Philippines, Singapore, Thailand, Vietnam)*. According to the U.S. State Department, the annual number of victims of *transborder* trafficking for sexual exploitation in Southeast Asia is about 225,000. Table 8 shows recent estimates. In addition, there exists large-scale domestic trafficking related to the sex industry in Burma, Cambodia, Thailand, Vietnam, the Philippines, and Indonesia (Flam 2003).

Thailand is the entry point. It is a major source, destination, and transit country and the main destination for European and North American sex tourism in Asia. The main sources for trafficking are Laos, Burma, China, Russia, and Vietnam. Thai women are trafficked all over the world, the main destinations being Japan, western Europe, and North America. Estimates of the volume of trafficking *into* Thailand vary wildly, between 200,000 and a million women annually. Estimates of trafficking *from* Thailand abroad are on the same scale (www.globalmarch.org).

According to the Thai authorities, there are approximately 75,000 active prostitutes. NGOs estimate the number at close to 2 million (the highest available estimate puts the number at 2.8 million), about a third of whom are minors (www.catw-ap.org/facts.htm). The main concentrations are Chiang Mai, Bangkok, Pattaya, and Phuket. The largest groups of foreigners in prostitution according to Thai officials are from Burma (20,000–50,000), Russia and the CIS countries (10,000), and China (5,000) (www.stickmanbangkok.com/reader/reader291.html). The largest concentration of Thai prostitution abroad, 40,000–60,000 women, is in Japan (www.globalmarch.org).

Cambodia is another important source, transit, and destination country. The centers of the sex industry are Phnom Penh and other cities. Victims come mainly from the surrounding countryside, and Cambodians are also trafficked to neighboring countries in Southeast Asia. There is little reliable data on the volume of trafficking, but some estimates are that as many as 10,000–15,000 women and girls are trafficked *out of* the country annually. There is also large-scale trafficking from abroad. Many of the estimated 15,000–20,000 prostitutes in Phnom Penh are Vietnamese, with as many as 3,000 trafficked to Cambodia each year. A large percentage are minors, and many of their clients are foreign sex tourists (Muhonen 2005; www.globalmarch.org).

The other main source areas are the Philippines and Burma. Estimates of the volume of trafficking from the Philippines are vague. In Japan, there are 60,000–150,000 Filipinos engaged in prostitution, and in South Korea about 1,000–2,000; how many are victims of trafficking is not known. However, the Philippines is one of the main source countries of female migration, legal and illegal, in Asia, and the migration networks out of the country extend throughout the whole world. The number of victims of trafficking is high, and they are to be found on every continent. The number of women and children in prostitution in the Philippines is estimated at between 300,000 and 500,000. The country has a significant child prostitution problem, with 60,000–100,000 children involved (Ehrenreich and Hochschild 2003).

The main destinations for Burmese victims are the other countries in the region, especially Thailand, China, and Pakistan. There is also large-scale internal trafficking from rural areas to major cities. Estimates of the annual number of victims in Burma vary between 10,000 and 50,000. At least 50,000 Burmese women are believed to be engaged

in prostitution in Thailand and about 200,000 in Pakistan (www.globalmarch.org).

Source countries of lesser importance are Indonesia and Vietnam. Malaysia is mainly a destination, and the volumes to and from the country are substantially smaller than in its neighbors. Singapore is an important transit point for trafficking networks connecting India, Thailand, Malaysia, China, Sri Lanka, and Indonesia.

3. *Central Asia (Afghanistan, Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, Uzbekistan)*. According to IOM estimates, central Asia is becoming an important source area for Asia. The economic difficulties that the central Asian countries are currently facing are fostering a favorable environment for the recruitment of potential victims (IOM 2001a).

The number of Kyrgyz women working as commercial sex workers abroad is estimated at somewhere between 500 and 2,000, and that of Tajik women at between 2,000 and 3,000. Estimates are not available from the other central Asian countries. The main destination is Russia. Secondary destinations are the United Arab Emirates, other Persian Gulf states, and Turkey (IOM 2001a).

In Afghanistan, trafficking in women is usually linked to ancient local traditions. Women and young girls are abducted in significant numbers for forced marriages. The number of reported crimes was twenty-four in 2002–3. The real figure, however, is believed to be high, partly because the abductors are often armed groups under local military control. Women and girls are also used in substantial numbers as a tradable sexual commodity in the settling of disputes between families and communities²⁹ (IOM 2003c).

A third form of trafficking for sexual exploitation common in Afghanistan is sexual servitude. It is a specific form of servitude with a sexual violence component and is often difficult to distinguish from rape. The victims are abducted by armed groups, or by individuals, and held captive for a period from some days to several months. During captivity, they are subjected to repeated rapes and forced to perform

²⁹ For example, in cases of homicide the family of the perpetrator must offer one or more girls to the victim's family to restore its honor. The girl is engaged or married to a member of the victim's family. Occasionally, the victim's family will also offer a daughter to the perpetrator's family, especially if members on both sides have been killed through retribution attacks. The marriages agreed on this way are tainted, however, since the stigma of the crime remains with the girl for life, and many of the girls commit suicide (IOM 2003c).

domestic labor (the latter pertains primarily to women and girls) (IOM 2003c).

Information on the volume of trafficking to, within, and from the region is scarce, but on the basis of data from Tajikistan and Kyrgyzstan, a reasonable estimate is 1,000–15,000 victims a year.

4. *Middle East (Bahrain, Iran, Iraq, Israel, Jordan, Kuwait, Lebanon, Oman, Palestine, Qatar, Saudi Arabia, Syria, the United Arab Emirates, Yemen)*. The Middle East is mainly a destination and transit area. The main destination countries are Israel and the Persian Gulf states (especially the United Arab Emirates).

To the Israeli sex industry, women are brought mainly from Moldova, Russia, and Ukraine and in lesser numbers from Brazil, Turkey, South Africa, and Southeast Asia. According to local NGOs, thousands of women are trafficked into the country annually. During 1995–97, 1,500 Russian and Ukrainian trafficked women were deported (500 per year on average) (www.globalmarch.org).

In the United Arab Emirates the main source areas are Russia, Ukraine, central Asia, South Asia, and Southeast Asia. Estimates of the volume of trafficking are scarce, but it is believed to have slightly decreased after the country tightened its entry visa requirements for young women.

Prostitution is largely taboo in the region, and information on prostitution-related trafficking is even scarcer than elsewhere. The annual number of victims is likely to be several thousands in Israel and the United Arab Emirates. The total number of victims in the whole region is somewhere between 10,000 and 50,000.

5. *South Asia (Bangladesh, Bhutan, India, Maldives, Nepal, Pakistan, Sri Lanka)*. South Asia is one of the main source and destination areas in the world. Table 9 shows recent estimates. The major trafficking flows go from Bangladesh and Nepal to India and Pakistan. About 10,000 Nepalese and 20,000 Bangladeshi women and girls (most of the victims in this region are minors) are estimated to be trafficked to neighboring countries annually. In addition, about 20,000 Burmese women are trafficked to Pakistan annually and an unknown number to India. There is also large-scale domestic trafficking in both India and Pakistan. In smaller numbers, Indian and Pakistani women are trafficked abroad to neighboring countries, the Middle East, Europe, Southeast Asia, and North America (www.globalmarch.org).

Estimates of people engaged in prostitution vary significantly.

TABLE 9
Estimated Trafficking Volumes, Source Areas, South Asia

Country	Annual Victims Trafficked within Country	Annual Victims Trafficked to/ through Country	Estimated Annual Victims Trafficked from Country	Source Areas
Bangladesh			20,000	Pakistan
Bhutan				
India	>150,000	12,000–50,000		Bangladesh/Nepal
Nepal			5,000–10,000	India
Sri Lanka	18,000–30,000			EU; AS; NA
Pakistan	>20,000	40,000–100,000		Bangladesh/Burma

NOTE.—EU = the E.U. member countries; AS = Asia; NA = North America (www.globalmarch.org).

About 200,000 Bangladeshi women and girls are estimated to be engaged in prostitution abroad (Pakistan and India) and from 60,000 to 100,000 in Bangladesh. In India, estimates of the number of people engaged in prostitution vary from 1 million to 9 million, some 15–30 percent of whom are children. The Indian Social Welfare Board estimates that there are 500,000 foreign prostitutes in India, of whom 160,000–200,000 are Nepalese. Another 25,000 Nepalese are engaged in prostitution in their home country (mainly in Kathmandu), 20 percent of them under age sixteen. In Pakistan it is estimated that 200,000 to 1 million Bangladeshi women and 200,000 Burmese women are engaged in prostitution in addition to an unknown number of natives. There are between 20,000 and 250,000 children in prostitution in Pakistan, about 40,000 of them of Bangladeshi origin (www.globalmarch.org).

The total of annual victims according to the above estimates lies somewhere between 250,000 and 500,000.

6. *Oceania (Australia, Fiji, Kiribati, Nauru, New Zealand, Papua New Guinea, Samoa, Tonga, Vanuatu).* Oceania is mainly a destination and transit area. The main destination is Australia; the victims come mainly from Thailand and Malaysia. Australia is also a major source for organized sex tourism abroad (the primary destinations are Indonesia, the Philippines, Thailand, South Korea, Sri Lanka, Taiwan, and Hong Kong).

In New Zealand, prostitution-related trafficking is rare. There are

an estimated 6,000–8,000 prostitutes active in the country, 25 percent of whom are of Thai or other Asian origin (www.globalmarch.org).

The total number of annual victims is likely to be between a few hundred and 10,000.

E. Africa

In Africa economic exploitation makes up a much larger percentage of trafficking than sexual exploitation does; however, the continent is also an important source area for prostitution-related trafficking to Europe and the Middle East. It is not possible to categorize the individual African countries as clear source, destination, or transit countries since almost all are all three. The destinations of large-scale prostitution-related trafficking and migrant prostitution inside Africa are mainly the South African Republic and Kenya, where the sex industries also recruit employees from outside the continent, from Asia and eastern Europe (the main source areas are Thailand and the Russian Federation). According to the GPAT database, Nigeria, Benin, Ghana, and Morocco are the main countries of origin of all types of trafficking in humans in the region. Trafficking inside the region originates mainly from other African countries (GPAT 2005, p. 1).

Estimates of the total volume of trafficking are even more vague than elsewhere. The annual figure is perhaps between 100,000 and 500,000.

1. *North Africa (Algeria, Egypt, Libya, Mauritania, Morocco, Tunisia).* Little information is available on the volume of trafficking. Algeria and Morocco are countries of origin for prostitution-related trafficking to Europe, especially to Italy and other southern European countries. Morocco is also an important transit country for trafficking from West Africa to Europe (www.protectionproject.org/human_rights/countryreport/algeria.htm; [morocco.htm](http://www.protectionproject.org/human_rights/countryreport/morocco.htm)).

Libya is mainly a transit country for trafficking from inner Africa to Europe. Egypt is a destination for Eastern European prostitutes, many of whom are trafficked further to Israel. In Mauritania, the problem is mainly domestic and related to sexual slavery common in the country (www.protectionproject.org/human_rights/countryreport/egypt.htm; [libya.htm](http://www.protectionproject.org/human_rights/countryreport/libya.htm); [mauritania.htm](http://www.protectionproject.org/human_rights/countryreport/mauritania.htm)).

No estimates are available of the volume of trafficking, but the number of victims is probably at least 10,000 annually. In Morocco the estimated number of women and children engaged in (illegal) prosti-

tution is over 200,000. In Algeria it is likely to be in the same range. In Egypt, the number is probably higher (www.protectionproject.org/human_rights/countryreport/algeria.htm/morocco.htm).

2. *West Africa (Benin, Burkina Faso, Cape Verde, Gambia, Ghana, Guinea, Guinea-Bissau, the Ivory Coast, Liberia, Mali, Niger, Nigeria, Senegal, São Tomé and Príncipe, Sierra Leone, Togo)*. In West Africa, the main trafficking flows occur inside the region and aim mostly at economic exploitation. Prostitution-related trafficking abroad goes mostly to Europe, but also to the Middle East, North Africa, and North America. The main source areas are Nigeria, Benin, Gambia, Ghana, and Senegal, and the major destinations are Belgium, France, Germany, Italy, the Netherlands, and Spain. Nigerian women are trafficked in larger numbers to North America (GPAT 2005, p. 1).

The dual legal system in many of the countries contributes to trafficking. In practice, customary laws derived from precolonial legal traditions govern the majority of the population. Under these laws, both legally and culturally, women and children are viewed as objects owned by their family, and as individuals they have few rights other than those granted by the heads of their families. This cultural context fosters the silence of abused women and children (www.protectionproject.org/human_rights/countryreport/benin.htm;togo.htm).

Estimates of the numbers of victims or people engaged in prostitution are few. UNICEF estimates that 200,000 children in West Africa are enslaved annually by cross-border trafficking rings; however, most are victims of economic exploitation. According to Nigerian authorities, 45,000 Nigerian women are trafficked for prostitution to Europe annually. The crime recruits its victims to a large extent in the Edo State in southwestern Nigeria (*Trafficking of Nigerian Girls to Italy* 2004; www.ipsnews.net/interna.asp?idnews=19418). The annual number of repatriated victims in Nigeria in recent years has been between 1,000 and 2,000 annually (*Trafficking of Nigerian Girls to Italy* 2004; www.protectionproject.org/human_rights/countryreport/nigeria.htm). The total number of deported illegal prostitutes from Niger and Mali in Algeria was 1,400 in the late 1990s (www.protectionproject.org/human_rights/countryreport/mali.htm). In Niger, 262 victims of trafficking were repatriated in 2001 (www.protectionproject.org/human_rights/countryreport/niger.htm).

The number of victims of prostitution-related trafficking in the region is probably considerable, perhaps 50,000–100,000 annually.

3. *Central Africa (Burundi, Cameroon, Central African Republic, Chad, the Congos, Equatorial Guinea, Gabon, Rwanda)*. Information on trafficking is scarce. Cameroon is reported to be a country of transit, origin, and destination. According to a report of the International Labour Organization, the volume of traffic of minors out of Cameroon is several thousands every year; most are transported for exploitative labor in neighboring countries, but many victims of economic exploitation are also sexually abused. The destination for prostitution-related trafficking from Cameroon is mainly western Europe (www.protectionproject.org/human_rights/countryreport/cameroon.htm).

Gabon again is mainly a destination country. Trafficking mostly involves the economic exploitation of children, but many victims of economic exploitation are also exploited sexually. Prostitution-related trafficking to Gabon takes place mainly from West Africa (www.protectionproject.org/human_rights/countryreport/gabon.htm). One of the main transit points in the region is reported to be Rwanda.

The main regional source country is the Democratic Republic of Congo (Kinshasa). Women and children are trafficked in large numbers to sex industries in western Europe, particularly Belgium. Prostitution flourishes in refugee camps in the country and in Tanzania, where more than 70,000 refugees from Burundi and Congo have moved because of civil wars (www.protectionproject.org/human_rights/countryreport/congo.htm).

No estimates of the total number of victims exist. A reasonable guess is between 10,000 and 100,000 annually.

4. *East Africa (Djibouti, Eritrea, Ethiopia, Kenya, Somalia, Sudan, Tanzania, Uganda)*. The main destination areas are Djibouti (French military bases) and Kenya. The other countries act mostly as recruiting areas. The main routes run within the area (to Kenya and Djibouti) and to the Middle East (Saudi Arabia, Bahrain, and Lebanon) and southern Africa (Malawi and South Africa). Ethiopian women are also reported to be trafficked in larger numbers to Europe (England) and Canada. The Kenyan sex industry imports employees from outside the region, mainly South Asia (India and Pakistan) (www.protectionproject.org/human_rights/countryreport/kenya.htm; [eritrea.htm](http://www.protectionproject.org/human_rights/countryreport/eritrea.htm); [ethiopia.htm](http://www.protectionproject.org/human_rights/countryreport/ethiopia.htm); [uganda.htm](http://www.protectionproject.org/human_rights/countryreport/uganda.htm); [tanzania.htm](http://www.protectionproject.org/human_rights/countryreport/tanzania.htm)).

Estimates of numbers of victims are few. There is a documented case of the repatriation of the bodies of sixty-seven Ethiopian women sold for prostitution in the Arab countries. According to the Women's Affairs Department in the Ethiopian Ministry of Labour, about 90,000 women work as prostitutes in Ethiopia, of whom 20 percent are minors. There is information on a case of 200 Kenyans trafficked for prostitution to Saudi Arabia. In Sudan, according to various reports, human slavery (including sexual slavery) is rampant, and U.S. government figures show that some 14,000 women and children from southern Sudan have been abducted in recent years (www.protectionproject.org/human_rights/countryreport/kenya.htm; [eritrea.htm](http://www.protectionproject.org/human_rights/countryreport/eritrea.htm); [ethiopia.htm](http://www.protectionproject.org/human_rights/countryreport/ethiopia.htm); [uganda.htm](http://www.protectionproject.org/human_rights/countryreport/uganda.htm); [tanzania.htm](http://www.protectionproject.org/human_rights/countryreport/tanzania.htm); [sudan.htm](http://www.protectionproject.org/human_rights/countryreport/sudan.htm)).

The annual number of victims in the region is well over 10,000. The volume of prostitution-related trafficking into and out of the region seems, however, to be smaller than in West Africa or in Central Africa.

5. *Southern Africa (Angola, Botswana, the Comoro Islands, Lesotho, Madagascar, Malawi, Mauritius, Mozambique, Seychelles, South Africa, Swaziland, Zambia, Zimbabwe)*. In southern Africa the situation varies substantially depending on the country. Trafficking is rampant in Angola, Malawi, Mozambique, South Africa, and Zambia, whereas Botswana and Namibia seem fairly free of it.

Angola, Malawi, Mozambique, and Zambia are the main source countries. Angolan and Mozambican women and children are trafficked mainly to South Africa or within their native countries. Zambian women are trafficked mainly to South Africa but also in large numbers to the Far East. Malawi is characterized by three different trafficking flows. Malawian-Nigerian female networks traffic women and girls to Europe by air. The main destinations are the sex industries in the Netherlands, Belgium, Germany, and Italy. Another type of trafficking takes place along major transportation routes, where long-distance truckers recruit women with promises of marriage, jobs, or educational opportunities in South Africa. Once in Johannesburg, the victims are held as the traffickers' sex slaves in private flats or sold further. Female Malawian trafficking networks also traffic victims directly to brothels in Johannesburg. Malawi also has a large-scale domestic sex industry mainly serving European sex tourism (IOM 2003d).

South Africa is a major country of origin, destination, and transit. The country's sex industry recruits employees within the country and from the neighboring countries and West Africa, but also from eastern

Europe, the Balkans, and Asia (India, Pakistan, China, Taiwan, and Thailand). South Africa is a major transit point for trafficking networks between developing countries and Europe, the United States, and Canada (IOM 2003*d*).

Volume estimates are few. According to Angolan officials, there are at least 38,000 Angolan victims of trafficking in South Africa alone. In Angola, the number of children in prostitution is at least 10,000. Namibian officials estimate that more than 4,000 Namibians may have been trafficked and forced into labor or prostitution during the last decade. In 2000, a Zambian government study found that an estimated 563,000 children between the ages of five and seventeen were involved in some form of domestic labor or prostitution. More than 75,000 children live in the streets in Zambia's major cities (www.protectionproject.org/human_rights/country_report/angola.htm; [namibia.htm](http://www.protectionproject.org/human_rights/country_report/namibia.htm); [zambia.htm](http://www.protectionproject.org/human_rights/country_report/zambia.htm)).

The numbers of victims in the region are probably similar to those in West and Central Africa (e.g., 50,000–100,000).

F. The Regional Distribution of Trafficking for Sexual Exploitation

Most of the global traffic for sexual exploitation is short-distance. In Europe, South Asia, the Asian Pacific Rim region, and West Africa, most of the trafficking takes place inside each region, from rural areas to cities and from economically depressed regions to affluent ones.

The main source areas of large-scale, long-distance trafficking are Brazil and the Dominican Republic in Latin America, Russia in Europe, Sri Lanka in South Asia, China in East Asia, Thailand and the Philippines in Southeast Asia, and Nigeria in West Africa.

The industrialized countries in Europe, North America, and the Asia-Pacific region are major destinations for international trafficking for prostitution as well as migrant prostitution. The trafficking to these countries constitutes only about 15 percent of the estimated global total minimum volume of 1.7 million victims, but their share of cross-border trafficking is considerably higher, maybe even over 30 percent.

The bulk of the prostitution-related cross-border trafficking takes place, however, between the third-world countries. This has been the case during the whole history of modern prostitution-related trafficking. It is estimated that in the first half of the twentieth century, 90 percent of all victims of global trafficking for prostitution were non-white women. The main roads of the trade ran between and inside the

European colonies in Africa and Asia (Scully 2001, pp. 86–87). Although the rapidly growing impact of European, Australian, Japanese, and North American sex tourism should not be underestimated, legislative and preventive measures taken in the E.U. member countries or North America only (especially if they do not effectively cover sex tourism elsewhere) have but a modest impact. Any effective preventive measures should be carried out globally.

V. Prevention, Crime Control, and Witness Protection

The factors that create, motivate, and direct global flows of trafficking are the same as those that direct the global migration flows as a whole: deep differences in standards of living between and within different geographic regions of the world. It is unlikely that fundamental changes can be achieved until global differences in living standards become less acute.

The most effective means of preventing trafficking is to support more equal global social and economic development and to remove obstacles to it. In Europe, the enlargement of the European Union can be expected to produce significant positive results in the future, although the most troubled countries (Albania, Moldova, and Ukraine) have so far not been included.

Measures taken in Europe or North America, however, can have only a minor effect on the global situation, since most trafficking takes place elsewhere. Thus all crime control and prevention policies ought to be global to be effective. The most crucial objectives are creating extensive and reliable global data-collecting systems; criminalizing trafficking in women globally with relatively uniform criteria and sanctions; developing and increasing cooperation in crime prevention internationally and interregionally (e.g., using as a model the experiences collected of the cooperation between the European countries); improvement of the status and rights of the victims in national legislation; creating efficient witness protection legislation and programs for victims of trafficking; and creating effective social and economic shelter programs for victims globally.

No reliable, comparative information is available anywhere on the extent of any type of trafficking or on the numbers and the nationality of the victims, not even concerning reported and prosecuted crimes. International efforts should be made (e.g., by the United Nations) to

create and harmonize national statistics concerning reported trafficking crimes, using relatively uniform criteria and compiled according to relatively consistent standards. NGOs are an important source of information, and means should be created to facilitate efficient and extensive collection of their information in each country and internationally. Mere statistics, however, produce only indicative information at best. To obtain better information and to create a basis for more efficient data collection systems, basic research concerning trafficking and organized prostitution should be increased all over the world. Plenty of valuable knowledge has already been produced within the research projects of the IOM and UNICRI, the STOP projects in Europe, and national research programs. The need for additional research is, however, urgent and great.

Legislation concerning trafficking in women is highly diverse, although attempts to unify it have been progressing. The international community should aim to harmonize national legislation and to improve the legal status of victims of trafficking. Trafficking should be made a special offense. Courts should have the right to seize assets belonging to convicted traffickers. Victims should receive help and protection when necessary. Governments should set up agreements to facilitate victims' return to their native countries if they so wish. Victims should be granted, if necessary, temporary residence status on humanitarian grounds. Extensive ratification of the Palermo Protocol and rapid application of its obligations in national legislation would hasten harmonization and should be a primary goal.

Special witness protection legislation for victims of trafficking exists mainly in some European countries. The laws are relatively recent, and there is not yet much experience with how they will work. All include the possibility of issuing temporary residence permits. In Belgium and the Netherlands, the consent of the victim to cooperate in the investigation and prosecution is required. In Italy, all victims have similar rights whether they cooperate or not. In Spain, the general witness protection law applies to victims of trafficking. Only Italy and Spain offer victims active police protection, which continues after court proceedings have ended (e.g., including the possibility of a new identity), but even in those countries the right to this kind of protection is largely theoretical. It is questionable how effectively victims' willingness to cooperate with the authorities (which is crucial for combating trafficking in persons) can be improved by granting only temporary residence

permits. Most European countries and countries elsewhere have no efficient witness protection programs (Pearson 2001, pp. 10–13).

Trafficking in persons is a transnational crime, and it is necessary to have effective international and regional police cooperation to combat and prevent it. Bilateral police and intelligence cooperation between different countries and international cooperation should be promoted in all possible ways.

VI. Conclusions

Trafficking and migration have historically been closely linked. This is also true today. The globalization of the international economy and the consequent transformation of local economies and societies, and deepening disparities in wealth and living standards, have led to a simultaneous increase in international migration (both legal and irregular) and in trafficking in persons related to both illegal labor markets and commercial sex markets. Trafficking networks exploit both the increasing economic and social misery in the countries on the losing side of globalization and the disintegration of the old nation-state structures in the industrialized world.

The current global extent of trafficking for prostitution is subject to rough estimates only, and in most cases it is unclear how these estimates have been reached. Despite widespread political and media publicity, trafficking for prostitution is not among the priorities of everyday crime prevention work in any country. Hence, accurate data are scarce, and information and studies are to a large extent based on the same few original sources and usually repeat the same stories. The topic (and consequently also data collection) is loaded both ideologically and morally, which does not help interpretation of data or research results. The needs to collect and exchange comparative information on trafficking throughout the world, allocate sufficient funds to monitor it, create databases, and carry out further research are great.

It is usually assumed that prostitution-related trafficking makes up 70–80 percent of all global trafficking in persons when measured by the numbers of victims. It is also assumed that the volume of this kind of trafficking and forced prostitution is much larger than the available sources show.

If we use the Palermo criteria as the definition of trafficking in persons, it is highly probable that the first assumption is false. Although

TABLE 10
Estimates, Trafficking, Child Prostitution, Industrialized
Countries

	Annual Victims, Adults and Minors	Minors in Prostitution
Western Europe ^a	60,000–150,000	>25,000
Central Europe	<50,000 ^b	<5,000
Israel	<5,000	
Canada	8,000–16,000	>1,000
United States	14,500–50,000	>100,000
Japan	50,000–250,000	<100,000
Australia and New Zealand	<10,000	5,000
Total	200,000–550,000	>235,000

^a Western Europe, the Mediterranean, and the Nordic countries.

^b Estimated victims trafficked to the region and from the region other than western Europe.

available data are sporadic and full of gaps, it is likely that other forms of trafficking, especially traffic for economic exploitation as domestic servants and as workers in agriculture, construction, and sweatshop industries, are at least as common as trafficking for sexual exploitation. In some regions, for example in Africa and North America, they are more numerous.

In spite of this, however, it is probably true that current estimates of the absolute volume of prostitution-related trafficking are underestimated rather than overestimated. Although the police authorities and the NGOs have a tendency to *exaggerate* rather than underestimate the role of trafficking and organized crime in *international prostitution of adults* (the new paradigm of organized crime can easily lead to this kind of exaggeration, and many NGOs have an ideological tendency to see all prostitution as trafficking-related), most of the existing estimates *underestimate the volume of domestic prostitution of minors*, or at least do not include it in the numbers concerning victims of trafficking (table 10 shows recent estimates). In order to obtain better knowledge and to create a basis for more efficient data collection systems, it is important to harmonize the definitions of trafficking in persons used in national legislations and statistics. The creation of an international database (an idea presented for the first time at the 1913 Madrid Conference) would improve the present situation considerably.

Most global trafficking for sexual exploitation is short-distance. According to the available estimates, about 60–80 percent of the trade

takes place *within* countries. The percentage of cross-border trafficking is only 25–30 percent of the total global volume, and the bulk is regional, taking place between neighboring countries. The major flows run from rural areas to cities and from economically depressed regions to affluent ones. The proportion of the traffic to the major industrialized countries (Australia, Canada, the E.U. member countries, Israel, Japan, and the United States) is only 10–20 percent of the global volume. Most prostitution-related trafficking takes place within and between the third-world and eastern European countries. However, industrial countries have an important indirect role in trafficking outside their borders, since Western and Japanese sex tourism forms a substantial part of the clientele of local prostitution in several third-world countries and in parts of Russia.

The main source areas of large-scale long-distance trafficking are Brazil, the Dominican Republic, Russia, Sri Lanka, China, Thailand, the Philippines, and Nigeria. Common to all of them is that they have an exceptionally good infrastructure for such trafficking: either strong domestic organized crime with wide global connections or long-standing traditions of female economic emigration with established global migration networks and immigrant communities (Ehrenreich and Hochschild 2003; Shelley 2004).

Although available data very likely overestimate the importance of prostitution-related trafficking relative to all global trafficking in persons, there are good reasons for keeping a focus on it. Aggravated abuses of human rights are substantially more common in trafficking for sexual exploitation than in other types of trafficking. The victims are submitted to violence and intimidation more often than victims of economic exploitation, their living and working conditions are worse, and their economic exploitation is more blatant. The victims are also usually younger and less capable of defending themselves or escaping abuse without outside help.

Whether prostitution as such should be allowed or abolished is a moral and ideological question and is beyond the scope of this essay. However, there is indisputable evidence that the criminalization of prostitution, and current policies in many countries (based to a large extent on the prostitution treaties of the twentieth century) that criminalize the exploitation of prostitution by third parties but leave the status of prostitutes unclear, create favorable circumstances for all forms of abuse of individual prostitutes (including trafficking). It is

important for the prevention of prostitution-related trafficking that the rights and the status of prostitution and prostitutes be defined clearly and that prostitutes be given the same economic, civil, and social rights as other citizens and foreigners.

It is also important to harmonize legislation concerning trafficking globally, as regards the criteria of crime, sanctions, and the status and the rights of the victims. Trafficking in persons should be made a special offense, and the victims of trafficking should be given legal rights to help and protection. Governments should also set up agreements to facilitate victims' return to their native countries if they wish, and victims should be granted, if necessary, temporary residence status on humanitarian grounds. The ratification of the Palermo Protocol as extensively as possible and the rapid application of its obligations in national legislation would hasten the harmonization process and should be a primary goal for the international community.

Even the most effective legislation is not enough if the will and resources for implementation are lacking. The volume of prostitution-related trafficking is so large, the routes used for trafficking so manifold, and the organization of the crime so flexible that it is not possible to close all the routes and eliminate all the networks. It is more practicable to concentrate on the main regional source countries and the most important junctions of the trafficking routes. This will require more efficient police and intelligence cooperation regionally and internationally. It is also crucial to continue and to invigorate efforts against corruption in border controls and police forces and on all levels of government (NCIS 2002, pp. 34–36).

Efforts against the crime networks should be combined with developing and strengthening effective protection and assistance mechanisms for victims of trafficking and with strengthening socioeconomic support programs and awareness-raising activities in both source and destination countries.

In the long run, the best ways to prevent prostitution-related trafficking and prostitution as a whole are to support and facilitate general social and economic development in the countries on the losing side of the current globalization process and work to achieve a more equal and balanced global economic and social development.

APPENDIX

International Treaties and Conventions

General Act of the Brussels Conference relative to the African Slave Trade (Great Britain, Austria-Hungary, Belgium, Congo, Denmark, France, Germany, Italy, Netherlands, Persia, Portugal, Russia, Spain, Sweden and Norway, Turkey, United States, and Zanzibar), with Annexed Declaration of the same date (Brussels, 2 July 1890; Australian Treaty Series no. 82/1892: C 6557).

International Agreement for the Suppression of the White Slave Traffic (Paris, 18 May 1904; Australian Treaty Series no. 024/1905: Cd 2689).

International Convention for the Suppression of the White Slave Traffic (Paris, 4 May 1910; Australian Treaty Series no. 020/1912: Cd 6326).

International Convention for the Suppression of the Traffic in Women and Children (Geneva, 30 September 1921; Australian Treaty Series no. 010/1922).

International Convention with (the) Object of Securing the Abolition of Slavery and the Slave Trade (Geneva, 25 September 1926; Australian Treaty Series no. 016/1927: Cmd 2910).

International Convention for the Suppression of the Traffic in Women of Full Age (Geneva, 11 October 1933; Australian Treaty Series no. 012/1936).

Protocol to Amend the Convention for the Suppression of the Traffic in Women and Children of 30 September 1921, and the Convention for the Suppression of the Traffic in Women of Full Age of 11 October 1933 (Lake Success, 12 November 1947; Australian Treaty Series no. 017/1947).

Protocol Amending the International Agreement for the Suppression of the White Slave Traffic of the 18th May 1904 and the International Convention for the Suppression of the White Slave Traffic of 4th May 1910 (Lake Success, 4 May 1949; Australian Treaty Series no. 085/1953: Cmd 9042).

Convention for the Suppression of the Traffic in Persons and of the Exploitation of the Prostitution of Others (Geneva, 1949; www.unhchr.ch/html/menu3/b/33.htm).

Slavery Convention signed at Geneva on the 25th September 1926, as amended by the Protocol agreed at New York on 7th December 1953 (together with the Protocol of 7th December 1953 and the Annex to that Protocol) (New York, 7 December 1953; Australian Treaty Series no. 24/1956: Cmd 9797).

Convention on the Abolition of Slavery, the Slave Trade and Institutions and Practices Similar to Slavery, Supplementary to the International Convention signed at Geneva on 25 September 1926 (Geneva, 7 September 1956; Australian Treaty Series no. 059/1957: Cmd 257).

Convention on the Elimination of All Forms of Discrimination against Women (New York, 18 December 1979; Australian Treaty Series no. 009/1983).

United Nations 2000 Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United

Nations Convention against Transnational Organized Crime (Palermo Protocol; A/RES/55/25).

E.U. Legislation

Council Framework Decision of 19 July 2002 on Combating Trafficking in Human Beings (2002/629/JHA; Official Journal L 203, 01/08/2002 P. 0001–0004).

Document COM (2000)854 final du 21.12.2000.

U.S. Legislation

Trafficking Victims Protection Act (22 U.S.C. 7101 et seq.).

Web Sites

allserv.rug.ac.be/~rmak/europap/rappor.html
archives.econ.utah.edu/archives/marxism/2004w28/msg00164.htm
fpmail.friends-partners.org:fpmail.friends-partners.org/pipermail/stop-trafficmigration.ucdavis.edu/mn/more_entireissue.php?idate=1999_11&number=11
missions.itu.int/~romania
news.bbc.co.uk/1/hi/world/europe/2293947.stm
stangoff.com/?p=70
209.190.246.239:209.190.246.239/ver2/cr/COUNTRY.pdf³⁰
web.pdx.edu/~leopoldo/ncsexwork.pdf
www.althingi.is/go/raedur/safn/000241.html
www.balticseataforce.dk/Trafficking/Traffickingreport.htm
www.brama.com
www.erieri.com
www.europap.net/pdf/bu_question_1.pdf
www.ex.ac.uk:www.ex.ac.uk/politics/pol_data/undergrad/aac/COUNTRY.htm
www.fo-stvkennisnet.nl/kr_fo
www.georgia-gateway.org
www.globalmarch.org:www.globalmarch.org/worstformsreport/world/COUNTRY.html
www.greekhelsinki.gr:www.greekhelsinki.gr/english/reports/ihf-wit-july-2000-COUNTRY.html
www.hrw.org/wr2k1/europe/macedonia.html
www.indianngos.com/issue/child/sexual/statistics/statistics11.htm
www.inet.co.th
www.interpol.int
www.ipsnews.net/interna.asp?idnews=19418
www.janes.com
www.osce.org:www.osce.org/odihr/attf/pdf/nap_COUNTRY.pdf

³⁰ To access information on a specific country for this and other Web sites, replace the word COUNTRY in the URL with the name of that country.

www.portcult.com
www.protectionproject.org/human_rights/countryreport/COUNTRY.htm
www.rferl.org
www.sexwork.com: www.sexwork.com/coalition/englandwales.html
www.state.gov: www.state.gov/g/drl/rls/hrrpt/2001/eur/COUNTRY.htm
www.state.gov/g/tip/rls/tiprpt
www.stickmanbangkok.com/reader/reader291.html
www.un.org/News/Press/docs/2001/WOM1294.doc.htm
www.undcp.org: www.undcp.org/odccp/trafficking_projects_COUNTRY.html
www.unhchr.ch/html/menu3/b/33.htm
www.unicef.org/vietnam/childse/pdf
www.unodc.org/unodc/en/trafficking_human_beings.html
www.uri.edu: www.uri.edu/artsci/wms/hugnes/COUNTRY.htm
www.worldsexguide.org: www.worldsexguide.org/COUNTRY.html
www1.umn.edu/humanrts/usdocs

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