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**ACHIEVING MILLENNIUM DEVELOPMENT GOALS THROUGH A RIGHTS-BASED
APPROACH FOR COMBATTING HUMAN TRAFFICKING**

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I. INTRODUCTION

United Nation's Protocol to Prevent, Suppress, and Punish Trafficking in Persons (Trafficking Protocol) defines human trafficking as the "recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of use of force of 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."¹ Simply put, human trafficking is modern day slavery.

An estimated 20.9 million adults and children are victims of forced labor according to the International Labour Office (ILO).² An abysmal number, women and children represent roughly 11.4 million victims or 55% of the total.³ Victims of trafficking are exploited in a variety of fields. Areas where victims are economically exploited include agriculture, construction, domestic work and manufacturing.⁴ Women and girls making up 98% of sexually exploited victims.⁵ When analyzing numbers by region, Asia and the Pacific accounts for the highest number of forced laborers at 11.7 million or 56% of the global total.⁶ Africa has the second highest number at 3.7 million or 17%.⁷ Nevertheless, because the nature of human trafficking is criminal and operates secretly, these numbers are likely to be understated.⁸

¹ UN General Assembly, *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime*, 15 November 2000.

² International Labour Office, *ILO Global Estimate of Forced Labor: Results and methodology*, http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_182004.pdf, (2012).

³ *Id.* at 14.

⁴ *Id.* at 13.

⁵ *Id.*

⁶ *Id.* at 16.

⁷ *Id.*

⁸ *Id.*

Root causes of trafficking are complex and often differ from one country to another.⁹ Social, economic, and cultural factors fuel human trafficking.¹⁰ The importance of those factors also varies on what region is being discussed.¹¹ Even so, there are common factors that create an environment vulnerable to trafficking. Poverty, oppression, lack of human rights, lack of social or economical opportunity, dangers from conflict or instability are a few common enablers.¹² Further, political instability, militarism, civil unrest, internal armed conflict and natural disasters may contribute to increased trafficking.¹³ For example, war leads to massive displacements of populations, leaving women and children especially susceptible.¹⁴

Just as factors “push” victims into trafficking, factors also “pull” victims. In hopes of a better future, many women migrate with their children to more economically promising areas. However, with modern day technology and a more interconnected world, these would-be migrants are certainly more vulnerable to traffickers.¹⁵ Thus, motivations for trafficking can occur on different fronts.

As stated earlier, women and girls represent over half of human trafficking victims. In some regions, social and cultural practices contribute to this phenomenon.¹⁶ For instance, in some cultures where women and girls are devalued, society makes them disproportionately vulnerable to trafficking.¹⁷ The issue is then further exacerbated by domestic corruption and lack of enforcement resources.¹⁸

⁹ OSCE Action Plan to Combat Trafficking in Human Beings, *Addressing the Root Causes*, http://www.unodc.org/documents/human-trafficking/Toolkit-files/08-58296_tool_9-2.pdf.

¹⁰ *Id.* at 454.

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.* at 455.

¹⁷ *Id.*

¹⁸ *Id.*

All of these factors contribute to human trafficking, the outright violation of human rights. The existence of poverty and oppression may never be eliminated, but the fact that women and children are often exploited in these circumstances should be alarming. Discussing why the international community should continue to combat human trafficking begins with protecting women and children.

This year, theme of the 58th session at the Commission on the Status of Women is to advance the Millennium Development Goals. Goals such as “Promot[ing] Gender Equality and Empower Women” and “Eradicat[ing] Extreme Poverty and Hunger” will shape the discussion.¹⁹ This paper will examine the causes and effects of human trafficking, explain how preventing human trafficking from a “rights based” approach will further MDGs across the board, a foundational paradigm emphasizing prevention, protection, and prosecution (“3Ps”), examples from countries who have implemented laws against trafficking, and will offer recommendations on how to combat the problem.

II. HUMAN RIGHTS STANDARDS

Women have historically been underappreciated members of society. Equal pay and increasing political participation for women have been persistent contemporary topics. Underpaid and underrepresented in the political arena, women have recently gained a stronger voice to effectuate change. The momentum should not stop now.

Gender equality is an idea that society should constantly be striving for. Social and political gender imbalance reinforces the environment that drives women into trafficking. The United Nations Population Fund correctly states, “Gender equality is, first and foremost, a human right. Women are entitled to live in a dignity and in freedom from want and fear.”²⁰ To

¹⁹ United Nations Millennium Development Goals, <http://www.un.org/millenniumgoals/>.

²⁰ United Nations Population Fund, *Gender Equality: A Cornerstone of Development*, <http://www.unfpa.org/gender/>.

empower women is to contribute to the health and productivity of whole families and communities for generations to come.²¹ So important is the concept of gender equality to the United Nations that it is embodied in the eight Millennium Development Goals.²² Gender equality is recognized as being essential to achieving the seven other goals.²³

Further, trafficking not only demonstrates the discrimination against women and children, but it is also a gross violation of human rights. The loss of human value and dignity that accompanies human trafficking can be considered a form of modern slavery. It can only be imagined what types of conditions trafficking victims are forced to live in. The vast majority of women who are lured into trafficking with false promises of employment are imprisoned and beaten.²⁴ Their lives are entirely controlled by their trafficker, to whom they are indebted for life.²⁵ The United Nations Office on Drugs and Crime (UNODC) spoke with Memey, an Indonesian woman who was trafficked and forced into commercial sex work.²⁶ She was quoted saying, “From my experience, women who become victims of human trafficking usually do not understand what human trafficking is, or that they are being trafficked.”²⁷ Emphasizing the need to stop human trafficking will educate more people on the issue and hopefully alert victims to situations that can be dangerous.

²¹ *Id.*

²² *Id.*

²³ *Id.*

²⁴ United Nations Office on Drugs and Crime, “*Put yourself in my shoes*”: a human trafficking victim speaks out, <http://www.unodc.org/unodc/en/frontpage/2012/November/put-yourself-in-my-in-my-shoes-a-human-trafficking-victim-speaks-out.html>, (Nov 28, 2012).

²⁵ *Id.*

²⁶ *Id.*

²⁷ *Id.*

The UNODC has addressed human trafficking through its 2000 adoption of the Protocol to Prevent, Suppress and Punish Trafficking in Persons.²⁸ It entered into force on December 25, 2003.²⁹ The full and effective implementation of the Protocol can be understood as having three interdependent and complementary components.³⁰ First, the Protocol promotes raising research and awareness.³¹ Educating the public about the dangers of human trafficking as well as its human rights violations will likely diminish its appeal. Secondly, the Protocol promotes the Protocol itself and capacity-building, establishing an infrastructure to monitor and combat trafficking is a surefire way to diminish numbers.³² Finally, the strengthening of partnerships and coordination through the Protocol will help governments fight trafficking together. No one country or body will be able to attack human trafficking alone. Because victims often cross borders and cultures, the only way is to ask for global cooperation and awareness.

The Protocol was part of a larger three-protocol proposal by the United Nations called the Palermo protocols.³³ Its purpose was to supplement the 2000 Convention Against Transnational Organized Crime also known as the Palermo Convention.³⁴ The other two protocols banned the smuggling of migrants from land, sea, and air and a ban on the illicit manufacturing and trafficking of firearms.³⁵

IV. FOUNDATION AND THE RIGHTS-BASED APPROACH

²⁸ Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children. Supplementing the United Nations Convention against Transnational Organized Crime, U.N. Doc. A/53/383 (2000) [hereinafter Palermo Protocol], available at <http://www2.ohchr.org/english/law/protocoltraffic.htm>.

²⁹ *Id.*

³⁰ United Nations Office on Drugs and Crime, *Human Trafficking*, <http://www.unodc.org/unodc/en/human-trafficking/what-is-human-trafficking.html>.

³¹ *Id.*

³² *Id.*

³³ United Nations Office on Drugs and Crime, *United Nations Convention against Transnational Organized Crime and the Protocols Thereto*, <http://www.unodc.org/unodc/en/treaties/CTOC/index.html>.

³⁴ *Id.*

³⁵ *Id.*

This paper will now turn to the “3Ps,” an embodiment of the most important objectives when implementing an attack plan against trafficking. Then, the paper will explore how to develop and implement a rights-based approach based on an understanding of the 3Ps.

A. The 3Ps: Prevention, Protection, Prosecution

Governments all over the globe have used the “3P” paradigm to guide the fight against human trafficking.³⁶ This paper will assert that to affectively combat trafficking through any method, the Ps should serve as a foundation.

The first “P” represents prevention. Historically, prevention efforts revolved around public awareness campaigns that informed and educated local communities about human trafficking.³⁷ More recently, prevention has taken on a more active role through legislation and programs.

The second “P” is protection. The core of all efforts surrounding trafficking is to protect victims and potential victims.³⁸ The rights of the victim are of the most important priority. Governments should have programs or safeguards in place to ensure that a survivor’s dignity and to provide opportunities to re-enter society through safe means.³⁹

The third and last “P” stands for prosecution.⁴⁰ To successfully prevent trafficking, consequences must be enforced against enablers. Holding criminals and aiders liable for their action will significantly discourage any future trafficking. There is no strong deterrent in countries or states where traffickers are given lenient sentences. With these three principles in mind, the fight against trafficking can then be strengthened by a “rights-based” approach.

³⁶ Office to Monitor and Combat Trafficking in Persons, *The 3Ps: Prevention, Protection, Prosecution*, <http://www.state.gov/documents/organization/167334.pdf>, (June 2011).

³⁷ *Id.*

³⁸ *Id.*

³⁹ *Id.*

⁴⁰ *Id.*

B. Education and Employment Based Rights

All over the world, women and girls experience discrimination of every kind. The most difficult to comprehend may be the disparity in access to education and employment. In many cultures, traditional roles are emphasized for the women and girls in the household. This perpetual cycle endangers women in more ways than just trafficking. To stunt female intellectual development and growth is to truly limit opportunity and individual worth. The first right to be emphasized is the right to an education. A discussion on the right to employment will follow.

i. Education

Data collected by United Nations Educational, Scientific and Cultural Organization (UNESCO) indicates that progress is being made towards gender parity in schools.⁴¹ However, a wide gap between boys and girls still remains.⁴² In 2011, an estimated 31 million girls of primary school age and 34 million girls of lower secondary school age were not enrolled in school.⁴³ Without formal education, girls are at an extreme disadvantage to participate and contribute to society.

This educational approach serves the prevention aspect of the 3Ps. For example, by protecting and providing future interests in education, trafficking will become futile. “Many children are trafficked to and from Nigeria...and far too often parents believe that their children will be beneficiaries of proper care when taken away from traffickers,” said Ms. Abubakar, founder of Nigerian NGO, Women Trafficking and Child Labour Eradication Foundation (WOTCLEF).⁴⁴ It is logical then that equipping children with tools to provide for themselves and

⁴¹ United Nations Educational, Scientific and Cultural Organization, *Gender and Education*, <http://www.uis.unesco.org/Education/Pages/gender-education.aspx>.

⁴² *Id.*

⁴³ *Id.*

⁴⁴ United Nations Population Fund, *Consultative Meeting on Trafficking in Women and Children*; Bratislava, Slovakia, <http://www.unfpa.org/webdav/site/global/shared/documents/publications/2003/Trafficking.pdf>, (24 Oct 2002).

their future families will keep trafficking at bay. Parents will also be less motivated by current economic situations to push their children into trafficking if they can reasonably rely on education opening doors.

Further, empowering women and girls with knowledge and girls would also benefit society in practical ways. The economy could benefit from a larger class of able-bodied, intelligent people. Investing in girls' education is very effective in reducing poverty.⁴⁵ Girls who are educated are likely to marry later in life, have smaller families and a healthier lifestyle.⁴⁶ Educated women are also more knowledgeable on their health and personal well being, reinforcing those ideas in their children.

However, women and girls are not the only ones who can benefit from an education. Because women and children make up the majority of victims trafficked for sex, "understanding the psychology of male demand" is integral.⁴⁷ The sex trafficking industry is a billion-dollar enterprise.⁴⁸ And the entire operation is predicated on the unspoken assumption that buying sex from females should be tolerated, accepted, and legitimized as a 'necessary evil' because a male's need for sexual intercourse is strong and unrestrainable.⁴⁹ Society reinforces notions about what sexuality, masculinity, and peer pressure by normalizing and accepting the purchase of sex.⁵⁰ For example, a study showed that 40% to 46% of migrant Mexican male workers in the United States purchased sex.⁵¹ While only 5% of them had ever bought sex while in Mexico.⁵²

⁴⁵ United Nations Population Fund, *Promoting Gender Equality: Empowering Women through Education*, <http://www.unfpa.org/gender/empowerment2.htm>.

⁴⁶ *Id.*

⁴⁷ Iris Yen, *Of Vice and Men: A New Approach to Eradicating Sex Trafficking by Reducing Male Demand through Educational programs and Abolitionist Legislation*, *Journal of Criminal Law and Criminology*, <http://scholarlycommons.law.northwestern.edu/cgi/viewcontent.cgi?article=7292&context=jclc>, (2008).

⁴⁸ *Id.* at 659.

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ *Id.*

⁵² *Id.*

The isolation from their wives and girlfriends compounded by peer pressure drove them towards trafficking.⁵³ In Thailand, men have been accustomed to using prostitutes as a right of passage and male bonding ritual.⁵⁴ Thus, the purchase of commercial sex, as demonstrated through these examples, demonstrates what society expects “real men” to do and pressures them to conform.⁵⁵

ii. Employment

Providing access to education, itself, is only part of the answer to diminishing human trafficking numbers. The creation of proper jobs will assist women in gaining income, respect, and status within the community. Education would be fruitless if there were no opportunities to apply the tools and knowledge learned. Thus, education coupled with employment opportunities would make trafficking less attractive.

Promoting employment rights would help countries comply with treaties and conventions already in place. The Convention on the Rights of the Child and the Convention on the Elimination of Discrimination Against Women both recognize the right to gainful employment.⁵⁶ The Conventions contain provisions that set out standards for discrimination, economic exploitation, and labor guidelines.⁵⁷

Increasing employment would also serve the interests of the three P’s through prevention and protection. Again, similar to the rationale for providing greater access to education, emphasizing equal opportunity of employment would prevent women to turn to trafficking. Employment can also be applied to the prosecutorial element of the three P’s. Local and federal governments should direct the

⁵³ *Id.*

⁵⁴ *Id.*

⁵⁵ *Id.*

⁵⁶ UN General Assembly, *Convention on the Rights of the Child*, 20 November 1989, United Nations, Treaty Series, vol. 1577, p. 3, available at: <http://www.refworld.org/docid/3ae6b38f0.html>;

UN General Assembly, *Convention on the Elimination of All Forms of Discrimination Against Women*, 18 December 1979, United Nations, Treaty Series, vol. 1249, p. 13, available at:

<http://www.refworld.org/docid/3ae6b3970.html>.

⁵⁷ *Id.*

Department of Justice to the full range of prosecutorial avenues available.⁵⁸ Tax enforcement and labor and employment laws can be used to prosecute traffickers.⁵⁹

Moreover, at CSW's 55th session, the access and participation of "women and girls in education, training and science and technology, including for the promotion of women's equal access to full employment and decent work" was already incorporated into the Agreed Conclusions.⁶⁰ The ideas set forth in this paper are not novel. There simply needs to be continued force and support for these measures in order to curb human trafficking.

V. COUNTRY SPECIFIC INITIATIVES

Countries have responded to trafficking in numerous ways. This paper now highlights the particular initiatives Ghana, China, and the U.S. have taken to address trafficking in their respective countries.

A. Ghana

In December 5, 2005, Ghana enacted its own Human Trafficking Act.⁶¹ The Act was mainly guided by the UN's Protocol to the Prevent, Suppress, and Punish Trafficking in Persons.⁶² The Act is comprised of three necessary components, similar to the Palermo Protocol: 1) prevention of human trafficking; 2) protection of trafficked persons; and 3) prosecution of traffickers.⁶³

While it is close to impossible to completely eradicate trafficking, Ghana has achieved considerable success in implementing the Act.⁶⁴ In regards to prevention, the Act created a body called

⁵⁸ Recommendations for Fighting Human Trafficking in the United States and Abroad, <http://www.freetheslaves.net/Document.Doc?id=96>, (Nov 2008).

⁵⁹ *Id.*

⁶⁰ As, Commission on the Status of Women 55th Session, http://www.un.org/womenwatch/daw/csw/csw55/agreed_conclusions/AC_CSW55_E.pdf.

⁶¹ Manda Sertich Marijn Heemskerk, *Ghana's Human Trafficking Act: Success and Shortcoming After Six Years of Implementation*. <http://www.wcl.american.edu/hrbrief/19/1sertich.pdf>.

⁶² *Id.* at 2.

⁶³ *Id.*

⁶⁴ *Id.*

the Human Trafficking Management Board to oversee measures specifically related to trafficking.⁶⁵ The Board also exercises authoritative power, advising the Minister on a wide range of policy matters, including the construction of shelters for trafficked persons in each region.⁶⁶ The first “P” is arguably where Ghana has achieved its goals most successfully.⁶⁷

For protection, Ghana has had some difficulty garnering action by the Ghanaian government, leaving most of the work for civil society to pick up.⁶⁸ Section 14 of the Act tasks law enforcement and immigration officers with victim rescue.⁶⁹ Ghana’s Ministry of Women and Children’s Affairs is then suppose to provide temporary basic material support, counseling, assistance in locating families, introduce the development of employs skills and employment opportunities.⁷⁰ The Act also offers enhanced protection to undocumented foreign nationals by offering temporary immigration status and protecting identities.⁷¹ In practice, however, most of the tasks are carried out by NGOs due to lack of government resources.⁷²

Lastly, Ghanaian prosecution has certainly seen improvement, but still has not reached its full potential.⁷³ The Act criminalizes the actions of the trafficker and other parties intending to assist the trafficker.⁷⁴ It also impressively negates parental consent as a defense in child trafficking cases.⁷⁵ The Act also punishes traffickers by confiscating their property and subjecting them to a minimum five-year prison sentence.⁷⁶ Trafficking is a second-degree felony in Ghana, making it a serious offense and

⁶⁵ *Id.* at 4.

⁶⁶ *Id.*

⁶⁷ *Id.*

⁶⁸ *Id.* at 5.

⁶⁹ *Id.*

⁷⁰ *Id.*

⁷¹ *Id.*

⁷² *Id.*

⁷³ *Id.* at 6.

⁷⁴ *Id.*

⁷⁵ *Id.*

⁷⁶ *Id.*

can only be tried in high courts.⁷⁷ Parents who traffic their children can also be found guilty under the Act.⁷⁸

The Ghanaian government's shortcomings stem from the country's lack of resources and funds. Numbers are difficult to gather because cases are not searchable in Ghana courthouses and arrests are hard to collect.⁷⁹ Nevertheless, there is certainly no lack of effort in trying to condemn human trafficking in Ghana. Without the government's commitment to fighting trafficking, Ghana's numbers would likely be much higher.

B. China

Although, China has some of the worst human trafficking statistics, the Government of China has put forth minimal effort.⁸⁰ In 2013, the U.S. State Department downgraded China to the lowest tier in human trafficking rankings, after sitting on the Tier 2 Watch List for nine years.⁸¹ Being in tier 3, China faces the prospect of sanctions at the discretion of the U.S. president and the State Department.⁸² The U.S. Government may also consider suspending U.S. funded programs in China.

In the context of the three Ps, the Chinese government has taken a few rudimentary steps to address trafficking in its country. It did release an eight-year national attack plan; in the plan, China did reaffirm the importance of international cooperation.⁸³ The government did not address, however, how its birth limitation policy created a massive gender imbalance and in turned fueled trafficking. The government also has not addressed the prevalence of child sex tourism and has made no efforts to prevent it from occurring.⁸⁴

⁷⁷ *Id.*

⁷⁸ *Id.*

⁷⁹ *Id.* at 7.

⁸⁰ U.S. State Department, *Country Narratives*, <http://www.state.gov/documents/organization/210738.pdf>, (2013).

⁸¹ *Id.* at 128.

⁸² *Id.*

⁸³ *Id.* at 129.

⁸⁴ *Id.*

Under protection, the second “p,” China’s efforts are also inadequate.⁸⁵ There has been little reporting on the government’s part on the actual number of victims assisted or services provided.⁸⁶ Chinese law does provide victims with the right to claim financial compensation by filing civil lawsuits and request prosecution.⁸⁷ Unfortunately, Chinese authorities continue to forcibly repatriate North Koreans and treat them as illegal economic immigrants.⁸⁸ Despite credible evidence that many North Koreans are trafficking victims, there is still no access to assistance and are being deported.⁸⁹

As for prosecution, Chinese law remains vague and unenforced.⁹⁰ The Chinese criminal code does prohibit trafficking, but does not define the concepts.⁹¹ Further, the laws are incomprehensive and leave out common forms of coercion.⁹² As a result, the problem of trafficking in China perpetuates without government intervention. In 2012, there were reports of schools forcing students to work in factories.⁹³ Local gangs and criminal syndicates continue to play integral roles in the trafficking of foreign women and children.⁹⁴ Without more action by the Chinese government, human rights will continue to be violated.

C. United States

Domestically, the United States has addressed human trafficking through the Trafficking Victims Protection Act (TVPA) of 2000.⁹⁵ The Act makes human trafficking a federal crime and was enacted in response to global efforts to eradicate human trafficking for sex and labor.⁹⁶ The Act

⁸⁵ *Id.* at 130.

⁸⁶ *Id.*

⁸⁷ *Id.*

⁸⁸ *Id.* at 131.

⁸⁹ *Id.*

⁹⁰ *Id.* at 130.

⁹¹ *Id.*

⁹² *Id.*

⁹³ *Id.* at 129.

⁹⁴ *Id.*

⁹⁵ Trafficking Victims Protection Act, <http://www.state.gov/j/tip/laws/61124.htm>, (2000).

⁹⁶ *Id.*

encourages laws speaking against trafficking to provide the three Ps: prevention, protection and prosecution.⁹⁷

In 1995, San Francisco was one of the first to focus its law enforcement on the demand side of prostitution, rather than the supply side.⁹⁸ The First Offender Prostitution Program (“FOPP”) gives first-time johns a citation and are offered the opportunity to pay a \$500 fee and attend a FOPP day-long educational and rehabilitation program.⁹⁹ The fines are used to fund social and health services for prostitutes, former and current.¹⁰⁰ FOPP was designed with intentional goals.¹⁰¹ First, it aims to expose the truths of the commercial sex industry, from the lucrative profits for pimps to the abuse inflicted on girls and women. Second, it aims to teach men about prostitution’s health hazards; “many johns are high sexual risk-takers yet are surprisingly ignorant about sexually transmitted diseases.” Lastly, FOPP aimed to appeal to the men’s consciences by reinforcing the fact that johns sustain and support a terrible system of repression and sexual exploitation.¹⁰² Studies have shown positive results.¹⁰³ During 1997 and 2001, 2200 men attended FOPP.¹⁰⁴ Of that group, only eighteen men were rearrested for soliciting prostitutes.¹⁰⁵ The recidivism rate is then very low at 0.008%; the recidivism rate for misdemeanor crimes being 33%.¹⁰⁶

This example indicates that, apart from the traditional sense of academic topics, men and boys should be *educated* in the concepts of equality as well. If boys are to see gender equality in

⁹⁷ *Id.*

⁹⁸ Yen, *supra* note 47 at 676.

⁹⁹ *Id.*

¹⁰⁰ *Id.*

¹⁰¹ *Id.*

¹⁰² *Id.*

¹⁰³ *Id.* at 677.

¹⁰⁴ *Id.*

¹⁰⁵ *Id.*

¹⁰⁶ *Id.*

education as children, they are more likely to not commodify women. And if men are educated on the repercussions of their actions, society is sure to benefit on many levels.

VI. RECOMMENDATIONS

Increasing employment opportunities will help eradicate poverty and hunger, a MDG. Providing equal access to education will help promote gender equality, empower women, and achieve universal primary education, also one of the Millennium Development Goals. Girls and women with a greater knowledge of the world and themselves will contribute to improving maternal health and reduce child mortality, also MDGs. It is clear then that the rights-based approach to combat trafficking is a step in the right direction that also satisfies many MDGs.

Human trafficking can certainly not be tackled on one front. Multiple MDGs, poverty, global partnership, gender equality, and universal education, will be addressed through the fight against trafficking. Highlighting women's rights to education and employment can only yield positive outcomes and further achieve the Millennium Development Goals. Therefore, Human Rights Advocates strongly urges the Commission on the Status of Women to include the above recommendations in its Agreed Conclusions.