



Comments on ESF Guidance Notes for Borrowers

Introduction

The objective of this comment document is to recommend the inclusion of two key concepts in the Guidance Notes on Environmental and Social Standards 1 and 2. The language we propose relates to: a) the integration of anti-human trafficking activities and interventions into broader development projects being funded by the World Bank, and b) adding a community resilience lens to anti-trafficking measures. These recommendations would help to move borrowers beyond a pure risk reduction model towards proactive integration and prevention that can yield better development outcomes and better compliance with Environmental and Social Framework (ESF) requirements.

Free the Slaves is a non-profit organization that liberates people from slavery around the world, and changes the conditions that allow modern slavery to persist. We are widely regarded as a human rights pioneer and innovator. We are submitting this commentary because we see an urgent need and opportunity to advance the integration of anti-trafficking into World Bank funded projects, and we believe these guidance notes represent a viable mechanism for doing so.

Recent research from the International Labor Organization¹ and others has shown the scope and impact of human trafficking, forced labor and modern slavery to be greater than previously thought, threatening economic stability, development, and global security. Human trafficking is a \$150 billion illicit industry² that pervades global supply chains while being universally condemned. New strategies are urgently needed to confront these threats at scale. Free the Slaves believes that the most time-efficient and cost-effective way to reduce these phenomena worldwide is to integrate anti-trafficking activities into the existing infrastructure of international development projects funded by the World Bank and others. At the same time, integrating these interventions has the potential to enhance development and poverty reduction outcomes through a concept we call the Freedom Dividend, which is explained in further detail below. Lastly, we believe a community resilience perspective is key to any intervention seeking to effectively prevent forced labor, as required under ESS2.

Justification for Inclusion

Although it seems clear that the ESF does not itself explicitly require the proactive integration of

¹ http://www.alliance87.org/global_estimates_of_modern_slavery-forced_labour_and_forced_marriage.pdf

² <http://www.ilo.org/global/topics/forced-labour/publications/profits-of-forced-labour-2014/lang--en/index.htm>

anti-human trafficking and forced labor interventions into broader development programming, Free the Slaves believes that the Guidance Notes present an excellent opportunity to introduce World Bank borrowers to these concepts. We recommend doing so for their awareness, and for potential implementation as a means to better achieve both existing ESS2 requirements around forced labor, as well as potentially improving development outcomes in tandem. Precisely because these Notes are not binding, and intended to promote the best practice for full compliance, inclusion of anti-trafficking integration as a concept should be non-controversial, with clear benefits and without negative impacts of inclusion. Likewise, the introduction of a community resilience concept can only enhance borrower efforts to prevent forced labor.

The Freedom Dividend and Community Resilience Model

While no group is immune, human traffickers typically target highly vulnerable villages and neighborhoods whose residents are often poor, uneducated, marginalized, desperate and unprotected – the same populations World Bank borrowers aim to help with a wide range of socioeconomic initiatives. Liberating slaves and removing the threat of trafficking opens the door to better household incomes and other development outcomes, which in turn helps to make communities more resistant to slavery. In short, human trafficking, modern slavery and forced labor are phenomena rooted in vulnerability, and these phenomena in turn create barriers to economic development. As such, anti-slavery and development programs can be mutually reinforcing.

The Freedom Dividend is the additional socioeconomic benefits to a community and its members arising from anti-trafficking analysis and interventions. These benefits derive from a holistic programming approach that includes prevention, rescue, reintegration, community mobilization, income generation, and government accountability. We know from a growing body of evidence that the benefits of freedom to a community include improved outcomes for:

- Education
- Medical Care
- Food Security
- Income Generation
- Wage Levels
- Family Debt
- Civic Participation
- Gender Participation
- Reduced Violence & Increased Rule of Law

While the body of knowledge on the benefits of anti-trafficking intervention into broader programming is still growing, we have some key examples we can share today:

- Free the Slaves has partnered with experts around several of their projects where Freedom Dividend outcomes have been noted. These include the results of a team of Harvard researchers evaluating the impact of a multi-year grant executed by Free the Slaves partner organization Manav Sansadhan Evam Mahila Vikas Sansthan (MSEMVS) in the state of Uttar Pradesh in India, (<http://cdn2.sph.harvard.edu/wp->

<content/uploads/sites/5/2016/03/When-We-Raise-Our-Voice.pdf>) and an evaluation of the impact of community-driven anti-trafficking interventions in Eastern Democratic Republic of the Congo mining zones (<https://www.freetheslaves.net/wp-content/uploads/2016/08/Congo-Program-Evaluation-Report-2015.pdf>).

- Key findings from these studies include:
 - Increases in school attendance and adult literacy
 - Increases in families eating three meals a day
 - Increases in child vaccination & access to contraception
 - Increases in livestock ownership
 - Increased number of families who could save
 - Decrease in informal lending, interest rates, family debt
 - Increases in perceptions of self-empowerment and voter turnout
 - Increased participation in government benefit programs

Specific Recommendations

Guidance on ESS1

- We propose including a short section articulating the potential benefits of the integration of limited anti-trafficking interventions and activities for both prevention of forced labor and enhanced development outcomes in broader programming. The section should include specific language on ancillary socio-economic benefits of such interventions through the Freedom Dividend or a related paradigm or framework, but also outline ways that anti-trafficking interventions can help make an Environmental and Social Commitment Plan (ESCP) more robust. This section could be integrated easily on page 17 and in Annex 2 of ESS1, as an additional component to consider in the development of an ESCP. We propose language similar to that contained in this comment in the Freedom Dividend Section, framed by introductory text that contextualizes these concepts as they relate to an ESCP. We also note that the concept of anti-trafficking integration could be gainfully added to discussion of the Environmental and Social Assessment, and other elements of the ESF.

- Proposed language:

“Borrowers should also consider the integration of anti-human trafficking and forced labor prevention initiatives in the ESCP for their project. This can yield benefits both for preventing forced labor and for broader development objectives of the project. This is because human traffickers typically target highly vulnerable communities, whose residents are often poor, uneducated, marginalized, desperate and unprotected – the same populations World Bank borrowers aim to help with a wide range of socioeconomic initiatives. Liberating slaves and removing the threat of forced labor opens the door to better household incomes and other development outcomes, which in turn helps to make communities more resistant to forced labor. In short, anti-trafficking and development programs can be mutually reinforcing, and this linkage should be considered in the design of each ESCP.”

Guidance on ESS2

- We propose language that would articulate the importance of a community resilience model

in understanding the causes of forced labor, and the inclusion of community empowerment interventions as a valuable tool for preventing forced labor in the project, as required under ESS2. This can be easily integrated on page 14 of this Guidance Note, by adding an additional section, GN20.3.

- Proposed language:

“GN20.3. Forced labor is fundamentally grounded in community vulnerability. Effective interventions to prevent forced labor in the project should look at the communities where labor is sourced from or the project is being implemented, and seek to build empowerment, rights awareness and resilience to help prevent exploitation from taking place. We recommend a holistic approach to such interventions that includes prevention, rescue, reintegration, community mobilization, income generation, and government accountability.”

Conclusion

A concerted effort to eradicate human trafficking, forced labor, and modern slavery is currently taking shape. The United Nations has called for slavery’s end as part of its Sustainable Development Goals, and U.N. agencies are beginning to forge a coordinated action agenda. The integration of anti-trafficking interventions into broader World Bank funded programming should play an important part in this gathering international agenda. Including these concepts in the ESF Guidance Notes could represent an important step in that direction.

Thank you in advance for your consideration of this submission.