

**Universal Periodic Review**

**Canada**

The United Nations Human Rights Council

**Human trafficking in Canada: new challenges**

Submission

presented by

Comité d'action contre la traite humaine interne et internationale

(CATHII)<sup>1</sup>



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<sup>1</sup> With the technical assistance of Franciscans International

1. Founded in 2004, the Comité d'action contre la traite humaine interne et internationale (CATHII) is a non-governmental organization that has, among other things, published a study on the needs of victims in Canada<sup>2</sup>, another on cases of forced labour in Canada<sup>3</sup>, as well as a directory of resources for victims of trafficking and established the Coalition québécoise contre la traite des personnes<sup>4</sup>. The members of CATHII are religious communities and faith groups, the vast majority of whom are members of UNANIMA International, an NGO in consultative status with ECOSOC. In addition, two members are associated with the Franciscan family represented at the United Nations by Franciscans International. CATHII made a joint submission with Franciscans International to Canada's periodic review in 2018.

2. Through this contribution, CATHII wishes to present the current situation in the fight against human trafficking in Canada and to make recommendations.

### **Canada and Human Trafficking**

3. In 2018, during the third Universal Periodic Review, Canada accepted several recommendations<sup>5</sup> related to trafficking in persons, including those related to forced labour. At the national level, among the legislation<sup>6</sup> and initiatives of the federal government, we must first mention the new National Strategy to Combat Human Trafficking (2019-2024)<sup>7</sup> developed with the 4 Ps: prevention, protection, prosecution and partnership, but adding a new dimension namely the empowerment of survivors. A survivor advisory committee, funding for a national public awareness campaign and a Canadian anti-human trafficking hotline are among the elements included in this action plan. Every two years, Statistics Canada<sup>8</sup> publishes a statistical bulletin on human trafficking in Canada.<sup>9</sup> At the time of writing, a draft law on forced labour in supply chains is under discussion.

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<sup>2</sup> See CATHII, *Frontline Responses to Human Trafficking in Canada: Coordinating Services for Victims*, 2014, available at: [http://www.cathii.org/sites/www.cathii.org/files/CATHII\\_english.pdf](http://www.cathii.org/sites/www.cathii.org/files/CATHII_english.pdf) (Last accessed 30 March 2023).

<sup>3</sup> CATHII, *The Exploitation of Foreign Workers in Our Own Backyards: An Examination of Labour Exploitation and Labour Trafficking in Canada*, August 2015, available at: [http://www.cathii.org/sites/www.cathii.org/files/the\\_exploitation\\_of\\_foreign\\_workers\\_in\\_our\\_own\\_backyards\\_0.pdf](http://www.cathii.org/sites/www.cathii.org/files/the_exploitation_of_foreign_workers_in_our_own_backyards_0.pdf) (Last accessed 30 March 2023).

<sup>4</sup> See CATHII, *Coalition Québécoise Contre La Traite Des Personnes*, available at: <http://www.cathii.org/node/83> (Last access 30 March 2023).

<sup>5</sup> From Thailand, Serbia, United Kingdom of Great Britain and Northern Ireland, Angola.

<sup>6</sup> For more details about legislation see: <https://www.canadianhumantraffickinghotline.ca/resources/trafficking-in-persons-in-canada-2020/>

<sup>7</sup> See PUBLIC SAFETY CANADA, *National Strategy to Combat Human Trafficking 2019-2024*, 2019, available at: <https://www.publicsafety.gc.ca/cnt/rsrscs/pblctns/2019-ntnl-strtg-hmnn-trffc/index-en.aspx> (Last accessed 30 March 2023).

<sup>8</sup> See STATISTICS CANADA, *La traite des personnes au Canada, 2021*, 6 December 2022, available at: <https://www150.statcan.gc.ca/n1/pub/85-005-x/2022001/article/00001-fra.htm> (Last accessed 30 March 2023).

<sup>9</sup> "... sexual exploitation is often the focus of human trafficking research, as are the experiences of female victims specifically. As such, male victims of sexual exploitation and victims of other types of trafficking might be overlooked..." <https://www150.statcan.gc.ca/n1/pub/85-005-x/2022001/article/00001-eng.htm>

4. Human trafficking through the lens of organ trafficking was the subject of a bill that received Royal Assent on December 15, 2022.<sup>10</sup> According to the *Globe and Mail*<sup>11</sup>: "It bans Canadians from travelling abroad to receive an organ transplant without the informed consent of a donor or someone authorized to give consent. It would make it illegal for Canadians to play any role in unauthorized organ transplants – with a maximum penalty of 14 years in prison."

5. At the international level, in 2019, Canada joined Alliance 8.7<sup>12</sup> to achieve target 8.7 of the United Nations Sustainable Development Goals on forced labour, slavery and the worst forms of child labour.

6. According to International Centre for Criminal Law Reform and Criminal Justice Policy: "Canada's federal system is important to consider in assessing whether certain promising antihuman trafficking practices from other countries would work in Canada. The federal parliament and the provincial legislative assemblies in Canada are independent with respect to certain areas of legislative authority, while other areas hold shared jurisdiction and responsibility. As a general matter, addressing the needs of victims – one of the foci of this report – is an area of shared responsibility between the federal and provincial governments. While victim services and assistance exist in all provinces and territories, certain other programs, measures and initiatives targeting victims of crime are administered federally, such as the temporary residence permits for internationally trafficked victims available from Citizenship and Immigration Canada ("CIC")."<sup>13</sup>

7. In 2021, following consultation with survivors and their supporters, Ontario developed new legislation that included amendments to existing legislation to strengthen its anti-trafficking strategy. In terms of prevention, awareness among the population is increased. At the protection level, with greater attention to minors and Indigenous peoples, victims and their caregivers can apply for restraining orders of more than three years. In addition, access to guest records for hotels and other types of short-term accommodation is available to police

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<sup>10</sup> PARLEMENT DU CANADA, Loi modifiant le Code criminel et la Loi sur l'immigration et la protection des réfugiés (trafic d'organes humains), 22 November 2021, available at: <https://www.parl.ca/legisinfo/fr/projet-de-loi/44-1/s-223> (Last accessed 3 April 2023).

<sup>11</sup> <https://www.theglobeandmail.com/politics/article-canada-passes-anti-organ-trafficking-bill-and-pro-tibet-motion/>

<sup>12</sup> Alliance 8.7 is "a global partnership fostering multi-stakeholder collaboration to support governments in achieving target 8.7 of Agenda 2030." See UN DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS, *Alliance 8.7*, available at: <https://sdgs.un.org/partnerships/alliance-87#:~:text=Alliance%208.7%20is%20a%20global,target%208.7%20of%20Agenda%202030> (Last accessed 31 March 2023).

<sup>13</sup> See ICCLR, *An Exploration of Promising Practices in Response to Human Trafficking in Canada*, May 2010, available at: <https://icclr.org/wp-content/uploads/2019/06/An-Exploration-of-Promising-Practices-in-Response-to-Human-Trafficking-in-Canada.pdf?x34947>

<sup>14</sup> See NEWSROOM ONTARIO, *Ontario passes bill to strengthen the fight against human trafficking*, 1 June 2021, available at: <https://news.ontario.ca/en/release/1000237/ontario-passes-bill-to-strengthen-the-fight-against-human-trafficking> (Last accessed 31 March 2023).

services<sup>14</sup>.

8. A law in the province of Saskatchewan came into force in April 2022 allowing victims to apply for a protection order – prohibiting traffickers from contacting victims – to take legal action and also to seek financial compensation<sup>15</sup>.

9. Covid-19 also exacerbated vulnerabilities of victims of forced labour and more generally human in trafficking. A report<sup>16</sup> by Migrants Rights Network documented the situation of high vulnerability and exploitation during the 9 pandemic with the participation of 201 temporary domestic workers. The vast majority of survey respondents are racialized women who recount "uninterrupted daily work, thousands of dollars in unpaid wages, employers asking to stay home for months, evictions during the pandemic, and the consequences of separation from their families.»<sup>17</sup> While this data refers to only domestic workers, similar challenges were faced in other sectors.

10. While there is federal and provincial level legislation and policies on human in trafficking, there are still challenges in different areas. This text is focusing on the gaps referring to prevention, protection, and empowerment.

### *Prevention*

11. As noted in several studies and research<sup>18</sup>, the vast majority of forced labour cases in Canada involve migrant workers using official channels to come to work in Canada, including the Temporary Foreign Worker Program<sup>19</sup>. In 2016, this Temporary Foreign Worker Program (TFWP) was reported by a committee of Members of Parliament, including its Primary

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<sup>14</sup> See NEWSROOM ONTARIO, *Ontario passes bill to strengthen the fight against human trafficking*, 1 June 2021, available at: <https://news.ontario.ca/en/release/1000237/ontario-passes-bill-to-strengthen-the-fight-against-human-trafficking> (Last accessed 31 March 2023).

<sup>15</sup> See GOVERNMENT OF SASKATCHEWAN, *New legislation to protect victims of human trafficking in effect*, 25 April 2022, available at: <https://www.saskatchewan.ca/government/news-and-media/2022/april/25/new-legislation-to-protect-victims-of-human-trafficking-in-effect> (Last accessed 31 March 2023).

<sup>16</sup> See MIGRANT RIGHTS NETWORK, *Behind Closed Doors: Exposing migrant care worker exploitation during COVID-19*, 28 October 2020, available at: <http://migrantrights.ca/BehindClosedDoors/> (Last accessed 3 April 2023).

<sup>17</sup> See RADIO-CANADA, *Des travailleurs domestiques surchargés pendant la pandémie*, 28 October 2020, available at: <https://ici.radio-canada.ca/nouvelle/1744885/travailleuses-migrantes-domestiques-pandemie-conditions-travail-covid> (Last accessed 3 April 2023).

<sup>18</sup> See CANADIAN COUNCIL FOR REFUGEES, *Forced labour happens in Canada: the Wasaga/Barrie case of Mexican migrant workers in Canada*, October 2019, available at: [https://ccrweb.ca/sites/ccrweb.ca/files/labour-trafficking-case-study-en-web\\_1.pdf](https://ccrweb.ca/sites/ccrweb.ca/files/labour-trafficking-case-study-en-web_1.pdf) (Last accessed 31 March 2023); FREEDOM UNITED, *Jamaican farmworkers in Canada organize against “systemic slavery”*, 24 August 2022, available at: <https://www.freedomunited.org/news/Jamaican-farmworkers-canada/> (Last accessed 31 March 2023).

<sup>19</sup> See this article: [http://s3.amazonaws.com/migrants\\_heroku\\_production/datas/2705/Jill\\_Hanley\\_et\\_al\\_-\\_Using\\_Human\\_Trafficking\\_Human\\_Rights\\_and\\_Labour\\_Law\\_to\\_Protect\\_Migrant\\_Workers\\_-\\_2020\\_original.pdf?1596485105](http://s3.amazonaws.com/migrants_heroku_production/datas/2705/Jill_Hanley_et_al_-_Using_Human_Trafficking_Human_Rights_and_Labour_Law_to_Protect_Migrant_Workers_-_2020_original.pdf?1596485105)

Agriculture Stream (SAWP)<sup>20</sup>. A comprehensive reform of the Temporary Foreign Worker Program was completed in February 2019. Temporary migrant workers in the agricultural sector are not only selected by employers with this program, but they also find themselves dependent on their employers because of the closed work permit. According to the Canadian Council of Refugees: "If their employer exploits them, their options are to remain with the employer or leave Canada. If they complain, their employer can fire them, resulting in the loss of their right to remain in Canada. Workers therefore often feel forced to endure abuse."<sup>21</sup>

12. Several organizations note the forms of abuse and exploitation of migrant workers in the field and this also applies to the agricultural community: " In Canada, migrant worker programmes involve being tied to the importing employer; low wages, often below the official minimum, and long hours with no overtime pay; dangerous working conditions; crowded and unhealthy accommodation; denial of access to public healthcare and employment insurance, despite paying into the programmes; and being virtually held captive by employers or contractors who seize identification documents. It is their temporary legal status that makes migrant workers extremely vulnerable to abuse; any assertion of their rights leads not only to contract termination but also deportation. Migrant workers thus represent the 'perfect workforce' in an era of evolving global capital-labour relations: commodified and exploitable; flexible and expendable. The exceptional freedom of globalised capital stands in stark contrast to the restrictions on those migrant workers whose precarious labour secures corporate profits." <sup>22</sup> According to the Canadian Council of Refugees (CCR) : "Closed work permits for Temporary Foreign Workers violate the International Covenant on Economic, Social and Cultural Rights, to which Canada is a signatory. Article 6 guarantees the right to freely choose or accept work, and to full and productive employment in conditions which safeguard workers' fundamental political and economic freedoms."<sup>23</sup>

13. The closed (or restricted) work permit is an open door to abuse, exploitation and forced labour. There is therefore an imbalance between the power in the hands of employers and the temporary and precarious situation of temporary migrant workers. For migrant worker support and anti-human trafficking organizations, this is the main change requested in the temporary migrant worker program, including the agricultural sector. Indeed, this type of work permit is an obstacle to the exercise of human rights. According to Commission des droits de la personne et des droits de la jeunesse (province de Québec), and as explained above "The restricted work

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<sup>20</sup> See HOUSE OF COMMONS OF CANADA, *Rapport du Comité permanent des ressources humaines, du développement des compétences, du développement social et de la condition des personnes handicapées*, September 2016, available at: <https://www.noscommunes.ca/Content/Committee/421/HUMA/Reports/RP8374415/humarp04/humarp04-f.pdf> (Last accessed 31 March 2023).

<sup>21</sup> See CANADIAN COUNCIL FOR REFUGEES, *Temporary Foreign Worker Program*, May 2016, available at: [https://ccrweb.ca/sites/ccrweb.ca/files/tfwp-review-submission\\_1.pdf](https://ccrweb.ca/sites/ccrweb.ca/files/tfwp-review-submission_1.pdf) (Last accessed 31 March 2023).

<sup>22</sup> See Walia, H. (2010). Transient servitude: migrant labour in Canada and the apartheid of citizenship. *Race & Class*, 52(1), 71–84, <https://journals.sagepub.com/doi/pdf/10.1177/0306396810371766>

<sup>23</sup> See CANADIAN COUNCIL FOR REFUGEES, *Temporary Foreign Worker Program*, May 2016, available at: [https://ccrweb.ca/sites/ccrweb.ca/files/tfwp-review-submission\\_1.pdf](https://ccrweb.ca/sites/ccrweb.ca/files/tfwp-review-submission_1.pdf) (Last accessed 31 March 2023).

permit infringes the right to liberty and the right to just and reasonable conditions of work that respect their health, safety and physical integrity."<sup>24</sup> While it is possible for a temporary migrant worker, as well as another worker, a witness, to report abuse online,<sup>25</sup> this possibility does not address the real causes of forced labour.

14. To no longer be tied to this employer, a temporary migrant worker, including one in the agricultural sector, must obtain another work permit. Indeed, Canada offers this opportunity to apply for an "Open Work Permit for Vulnerable Workers"<sup>26</sup>. The application must be made online and documents must be submitted in English or French. In practice, however, temporary foreign workers speak little or no one of Canada's two official languages<sup>27</sup>. In addition to language, other barriers include: literacy level, knowledge of how to use a computer and how to apply online, access to a computer, the obligation to provide documents in one of the official languages, waiting time, uncertainty of the answer. "It's a bandaid on a system that is broken from the beginning," said Fay Faraday, a lawyer and assistant professor at York University who has written several reports on Canada's migrant worker programs."<sup>28</sup> The workplaces of temporary migrants in the agricultural sector are often isolated, contributing to the invisibility of these workers. "Isolation in rural areas is a big reason why farm workers are so vulnerable, Yeager says. "You don't see them, and it's kind of out of sight, out of mind.»<sup>29</sup>

15. In addition, one of the main criticisms made by organisations supporting and defending the rights of migrant workers is the lack of access to permanent residence. According to CCR : "The root of the precariousness and vulnerability experienced by migrant workers in Canada is their precarious status in Canada. While opening TFW work permits to allow labour mobility will greatly improve this situation, access to permanent residence is the only measure that will truly eliminate the vulnerability that is built into the TFWP and put low-skilled migrant workers on an equal footing with the rest of Canadian society".<sup>30</sup>

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<sup>24</sup> See COMMISSION DES DROITS DE LA PERSONNE ET DES DROITS DE LA JEUNESSE, *La discrimination systémique à l'égard des travailleuses et travailleurs migrants*, p.90, December 2011, available at: [https://www.cdpcj.gc.ca/storage/app/media/publications/Avis\\_travailleurs\\_immigrants.pdf](https://www.cdpcj.gc.ca/storage/app/media/publications/Avis_travailleurs_immigrants.pdf) (Last accessed 31 March 2023).

<sup>25</sup> See GOVERNMENT OF CANADA, *Online form to report abuse of temporary foreign workers*, 11 January 2023, available at: <https://www.canada.ca/en/employment-social-development/services/foreign-workers/report-abuse/tool.html> (Last accessed 31 March 2023).

<sup>26</sup> Ibid.

<sup>27</sup> "Migrant workers applying for an open work permit must submit documentary evidence in English or French. Applications are only accepted online. The website is only in English and French. Mexican workers are by far the largest participants in the Seasonal Agricultural Workers' Program; most do not speak English and about 42 per cent have a primary school education or less, data obtained from the Mexican Ministry of Labour shows." See TORONTO STAR, *Open work permits for exploited migrant workers a 'Band-Aid solution', critics say*, 17 July 2020, available at: <https://www.thestar.com/business/2020/07/17/open-work-permits-for-exploited-migrant-workers-a-band-aid-solution-critics-say.html> (Last accessed 31 March 2023).

<sup>28</sup> Ibid.

<sup>29</sup> See AVENUE CALGARY, *Labour trafficking in Alberta*, 18 November 2019, available at: <https://www.avenuecalgary.com/city-life/labour-trafficking-in-alberta/> (Last accessed 31 March 2023).

<sup>30</sup> See CANADIAN COUNCIL FOR REFUGEES, *Temporary Foreign Worker Program*, May 2016, available at: [https://ccrweb.ca/sites/ccrweb.ca/files/tfwp-review-submission\\_1.pdf](https://ccrweb.ca/sites/ccrweb.ca/files/tfwp-review-submission_1.pdf) (Last accessed 31 March 2023).

16. Relying on temporary immigration policies does not serve the human rights of migrant workers. According to the Canadian Council of Refugees "should guarantee the right to all admitted as migrant workers, whatever the category, to apply for permanent residence at the same time as they apply for the work permit."<sup>31</sup>

## Recommendations

17. We recommend that Canada sign and ratify the International Convention on the Protection of All Migrant Workers and Members of Their Families.

18. That Canada amend temporary foreign worker programs to issue only open work permits and guarantee the right for migrant workers to apply for permanent residence as they apply for work permit.

## Protection

19. One of the measures for the protection of victims of trafficking is the Temporary Residence Permit or TRP.<sup>32</sup> In 2019, Canada amended this measure to become a special temporary resident permit. In its 2021-2022 report, Canada's Department of Immigration, Refugees and Citizenship notes that it "also continued the expedited processing of temporary resident permits for cases of family violence and trafficked persons."<sup>33</sup> According to the Canadian Centre to End Human Trafficking, the TRP measure functions as follow: " During this period, victims may need to build a strategy to leave the influence of traffickers, find safety and they will often need time to recover from physical and/or mental harm and trauma. Victims may or may not assist with the investigation or prosecution of traffickers. As this is not a requirement, it will be up to each individual based on their situation."<sup>34</sup> It is important that applying for the permit does not guarantee it will be granted and authorities could refuse such application.

20. This measure has been underutilized, and several organizations consider that the short period of 180 days is not sufficient for victims.<sup>35</sup> Some provinces allow the person with a TRP to access social assistance (last-resort financial support).

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<sup>31</sup> See CANADIAN COUNCIL FOR REFUGEES, CCR concerns: human trafficking in Canada, April 2018, available at: [https://ccrweb.ca/sites/ccrweb.ca/files/trafficking\\_brief\\_april\\_2018.pdf](https://ccrweb.ca/sites/ccrweb.ca/files/trafficking_brief_april_2018.pdf) (Last accessed 3 April 2023).

<sup>32</sup> See GOVERNMENT OF CANADA, Permis de séjour temporaire (PST) : Points à examiner en ce qui a trait aux victimes de la traite de personnes, 5 May 2016, available at: <https://www.canada.ca/fr/immigration-refugies-citoyennete/organisation/publications-guides/bulletins-guides-operationnels/residents-temporaires/permis/victimes-traite-personnes-points-examiner.html> (Last accessed 3 April 2023).

<sup>33</sup> See GOVERNMENT OF CANADA, 2020-2021 Immigration, Refugees and Citizenship Canada departmental progress report for Canada's National Action Plan on Women, Peace and Security, 13 July 2022, available at: <https://www.international.gc.ca/transparency-transparence/women-peace-security-femmes-paix-securite/2020-2021-progress-reports-rapports-etapes-ircc.aspx?lang=eng> (Last accessed 3 April 2023).

<sup>34</sup> See CANADIAN CENTRE TO END HUMAN TRAFFICKING, Temporary resident permit for victims of human trafficking, 12 August 2020, available at: <https://www.canadiancentretoendhumantrafficking.ca/temporary-resident-permit-for-victims-of-human-trafficking/> (Last accessed 3 April 2023).

<sup>35</sup> See Jimenez, E. (2011). La place de la victime dans la lutte contre la traite des personnes au Canada. *Criminologie*, 44(2), 199-224. <https://doi.org/10.7202/1005797ar>. (Last accessed 3 April 2023).

21. The Canadian Council for Refugees reports a number of difficulties in the allocation of the TRP: "The lack of consistency in the issuance and administration of permits across the country is one of the major obstacles to the effectiveness of the TRP, resulting in unequal treatment of trafficking survivors across regions, as well as between and within agencies."<sup>36</sup>

### **Recommendation**

22. That Canada ensure that potential victims of human trafficking and survivors of human trafficking have easy access to protection measures, as well as financial resources in accordance with a human rights approach, including temporary resident permits, for a minimum of 4 years<sup>37</sup>.

### *Empowerment*

23. In its 2019-2024 Human Trafficking Strategy, Canada defines the objective of the empowerment pillar as follows: "This pillar aims to empower youth and other vulnerable populations to protect themselves while piloting new interventions to support survivors."<sup>38</sup> The Canadian government has a centralized website<sup>39</sup> to provide the information needed to support survivors in both official languages, English and French. It also publishes an annual report on initiatives taken and supported and provides a directory of services for victims and anyone seeking services for victims.

24. It is difficult for any single organization to support the long-term empowerment of trafficked persons. A multi-agency approach, regional coalitions, whether in rural and/or urban settings, and long-term financial support for victim service organizations should be put forward to avoid agencies having to spend more time seeking the necessary financial and human resources than providing services. In addition, it is important that survivors also be able to choose what is right for them in the process of healing and regaining control of their lives, have their rights respected, so that they do not find themselves in a situation of loss of control in front of other stakeholders and police forces or otherwise.

25. There are additional challenges for specific groups. First Nations require measures in accordance with their cultures and ways of living. Some less populated areas of Canada present

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<sup>36</sup> See CANADIAN COUNCIL FOR REFUGEES, *Permis de séjour temporaires: limites à la protection des personnes ayant subi la traite*, June 2013, available at: <https://ccrweb.ca/files/rapport-permis-sejour-temporaire.pdf> (Last accessed 3 April 2023).

<sup>37</sup> See the US policy : <https://www.uscis.gov/humanitarian/victims-of-human-trafficking-and-other-crimes>

<sup>38</sup> Cfr. PUBLIC SAFETY CANADA, *National Strategy to Combat Human Trafficking 2019-2024*, 2019, available at: <https://www.publicsafety.gc.ca/cnt/rsrscs/pblctns/2019-ntnl-strtg-hmnn-trffc/index-en.aspx> (Last accessed 30 March 2023).

<sup>39</sup> See PUBLIC SAFETY CANADA, *Support for victims and survivors*, 25 August 2022, available at: <https://www.publicsafety.gc.ca/cnt/cntrng-crm/hmn-trffckng/spprt-vctms-srvvrs-en.aspx> (Last accessed 3 April 2023).



other challenges for access to services for survivors. As these authors state: « ... is the importance of supporting trafficked persons in ways that uphold self-determination and human dignity. Importantly, we emphasize that trafficked persons must be able to choose their own pathways to healing, with service providers delivering support and tools. Local and regional collaboration based on these principles serves to redress some of the gaps and barriers, to streamline and coordinate responses, and to develop and provide more comprehensive supports that empower and respect the self-determination of trafficked persons, their families, and communities. »<sup>40</sup>

### **Recommendations**

26. That Canada increase financial support for community-based initiatives aimed at empowering survivors of human trafficking.

27. That Canada collect and share best practices on the empowerment of trafficking survivors in consultation with community groups.

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<sup>40</sup> See Nagy, R., Snooks, G., Quenneville, B., Chen, L., Wiggins, S., Debassige, D., Joudin, K. & Timms, R. (2020). Human Trafficking in Northeastern Ontario: Collaborative Responses. *First Peoples Child & Family Review*, 15(1), 80–104. <https://doi.org/10.7202/1068364ar> (Last accessed 3 April 2023).