
CHAPTER 6

INTEGRATION OF TRAFFICKING CONCERNS INTO ADB OPERATIONS

6.1 Relevance of Trafficking to ADB

A complex range of factors influences the dynamics of trafficking. In recent years, ADB has developed and adopted an array of policies that provide both the mandate and instruments to engage more effectively in addressing many of these issues:

- *Policy on Gender and Development* provides guidance and measures to adapt operational designs to improve the status of women and girls and in so doing (among many other benefits), build their resistance to the risks of being trafficked.
- *Social Protection Strategy* sets out specific considerations that may need to be built into ADB operations to ensure that vulnerable groups can be protected from factors that cause and sustain their poverty—and their risks to being trafficked. The strategy also identified how labor markets can be used to strengthen social protection through implementation of core labor standards, which will have additional impacts on the demand for trafficked labor.
- *Promoting Good Governance, ADB's Medium-Term Agenda and Action Plan*¹⁶⁵ includes guidelines for improving the effectiveness of antitrafficking initiatives as well as other programs to combat poverty.
- *Policy on Involuntary Resettlement* and accompanying guidelines such as the *Handbook on Resettlement*¹⁶⁶ provide guidance on limiting vulnerabilities and risks of those living in and around

¹⁶⁵ ADB. 2000. *Promoting Good Governance, ADB's Medium Term – Agenda and Action Plan*.

¹⁶⁶ ADB. 1998. *Handbook on Resettlement: A Guide to Good Practice*.

project areas as well as stressing the importance of building or maintaining social capital to limit risks, such as trafficking.

- *Handbook on Poverty and Social Analysis*¹⁶⁷ provides guidance on ensuring that project impacts do not increase vulnerability to being trafficked and identifying opportunities to prevent, minimize, and mitigate development-induced risks.

However, if ADB is to make a contribution to combating trafficking, specific measures have to be taken within its operations. The following sections outline where the links exist between ADB operations of different kinds (regional and subregional cooperation, poverty partnership agreements, CSP development, project preparation, policy dialogue, etc.) and potential entry points to address trafficking. Overall, ADB operations have the potential to address trafficking in five key ways:

- **Target those most vulnerable to trafficking.** In many cases a subgroup within those targeted for poverty reduction as relative and absolute poor. Ensuring that this subgroup has their basic needs met to limit migration or mobility under stressful and hence most vulnerable situations—for example for families who send away children/girls who then end up being trafficked.
- **Assess the impacts of ADB operations.** It is imperative to ensure that ADB-supported activities do not push people into unwanted migration and hence vulnerability to trafficking. As identified in the ADB *Handbook on Poverty and Social Analysis* and *Handbook on Resettlement*, ADB operations have opportunities to prevent, minimize, and mitigate development-induced migration. Clear links can be made between involuntary displacement and its associated risks of being trafficked once moving.
- **Emergency loans and assistance in postconflict reconstruction.** These activities usually take place among mobile populations, such as refugees, or in areas where communities are returning from involuntary displacement. It is important that ADB activities provide adequate scope to rebuild social and human capital through community-based activities to ensure that physical and social dislocation does not lead to vulnerability to trafficking, especially for women and girls, in already high-risk situations.

¹⁶⁷ ADB. 2001. *Handbook on Poverty and Social Analysis – A Working Document*.

Disaster early-warning mechanisms can also incorporate antitrafficking and safe-migration messages as communities and individuals plan for possible displacement.

- **Encourage safe migration.** ADB could directly and indirectly reduce the risk of being trafficked of those already mobile through various policy or social protection measures:
 - Access by migrants to basic needs, e.g., urban improvement schemes take special measures to identify specific needs of migrant communities where social and community networks do not exist;
 - Social protection measures extended to migrants (e.g., insurance schemes, social security schemes). This is challenging as migrants generally work in the informal sector and many are squatters without official residence status; and
 - Governance strengthened to ensure entitlements to protection from criminal activities extended to those migrants most vulnerable to being trafficked; specific activities to increase community and government accountability to protect children, women, labor force, etc.
- **Stem demand for trafficked labor**
 - Core labor standards implemented and monitored in partnership with private sector, ILO, etc. particularly among small and medium enterprises and in the informal sector; and
 - Encourage activities with indirect impacts in key areas of demand, for example monitoring effects on demand for CSW along highways of changed behavior of transport workers through implementation of safety standards such as reduced driving time, days away from home, etc. These kinds of activities also have links with HIV/AIDS prevention activities.

6.2 Overall Approach: Mainstreaming

While all outcomes of ADB operations that contribute to reducing poverty can be **indirectly** linked to reducing vulnerability to being trafficked, there is ample scope to incorporate specific measures that can have more **direct** impact on reducing risks. The practical approaches adopted by ADB in the *Handbook on Poverty and Social Analysis* to

guide the implementation of the Poverty Reduction Strategy provides ideas and the *Handbook on Resettlement* provides guidance for identifying opportunities to incorporate trafficking concerns and entry points. The *Guide for Integrating Trafficking Concerns into ADB Operations* provides additional guidelines and information on links between trafficking and ADB operations, including tables that identify where links to combating trafficking can be identified based on the approach to poverty reduction set out in the *Handbook on Poverty and Social Analysis* and *Handbook on Resettlement*.

Furthermore, if mainstreaming trafficking concerns into ADB's operations is to be successful, it will also be necessary for staff with appropriate expertise to assist in preparing analysis of vulnerable groups and specific risks as well as designing specific components that directly or indirectly address trafficking concerns to provide leadership and take up these issues—these would include social development, social protection, and poverty reduction specialists.

The legal implications of strengthening codes of conduct and other contractual arrangements with ADB-financed contractors and suppliers also need to be investigated by Office of General Counsel staff. These mechanisms could be used to curb the use of trafficked or child labor. Monitoring indicators also have to be developed and assessed over time and there is potential to link with work already underway by ILO. Support from Project Coordination and Procurement Division will also be required if these approaches to limiting and monitoring the demand for trafficked labor are to be effectively implemented in ADB operations. Specific technical support and guidelines will be needed if these areas are to be fully effective. There is increasing interest among many experts to understand how these and similar mechanisms can be used to address trafficking as several ADB member countries have already put in place legislation or conditionality in their development assistance policies related to child labor and trafficking issues. For example under the United States Government's *Victims of Trafficking and Violence Protection Act of 2000*,¹⁶⁸ beginning in January 2003, the President may authorize the suspension of nonhumanitarian, nontrade-related assistance to any country that does not meet certain minimum standards for the elimination of trafficking and is not making significant efforts to bring itself into compliance with these standards.¹⁶⁹

¹⁶⁸ Pub. L. No. 106-386, 114 Stat. 1464.

¹⁶⁹ See additional discussion of this mechanism in ADB. 2002. RETA 5948, *Supplemental Study on Legal Frameworks Relevant to Human Trafficking in South Asia*.

In addition, the RETA's legal study, as summarized in Chapter 4 of this report, suggests that there are a number of opportunities for ADB to address legal issues related to trafficking and trafficking prevention within its regular programs of assistance to the three countries. These opportunities are particularly apparent in ADB's support for public service reform, anticorruption efforts, local governance, strengthening of social safety nets, law reform, legal empowerment, and access to justice. ADB's recent study of legal empowerment activities of NGOs in Bangladesh and other countries found a number of positive outcomes, for example, in addressing domestic violence, restraining the practice of dowry, and encouraging women to seek legal redress and participate in local-level decision making.¹⁷⁰ ADB's support for the legal empowerment of women and girls—for instance, through grants to NGOs involved in this work—could also reduce their vulnerability to trafficking. ADB's recent loan to Pakistan for its *Access to Justice Program* is also an important precedent.¹⁷¹ Through this loan, ADB is supporting criminal justice reform, including

Steps for Mainstreaming Trafficking into ADB Operations

- Where possible, flag the issue of trafficking in subregional strategies (e.g., subregional cooperation strategy and program) and country analysis and strategies (e.g., country poverty analysis, country strategy and program and updates, and country gender analysis and strategy).
 - Include the analysis of groups that are particularly vulnerable to trafficking in the initial poverty and social analysis and the full poverty and social analysis. In particular, include mobile populations into the analysis as well as women and children.
 - Develop project designs that would directly and indirectly combat and reduce human trafficking.
 - Identify and work with partners (e.g., ministries, NGOs, private sector including contractors, donors, etc.) to develop and implement antitrafficking project components.
 - Where nonlending products and services (e.g., technical assistance and sector and thematic works) provide opportunities, consider addressing trafficking.
 - Raise awareness among relevant ADB staff including dissemination of findings of the reports produced under regional technical assistance through various means such as: (a) publication, external website, and relevant committees and networks; (b) developing pilot projects with the initiatives of Regional Departments in collaboration with the Poverty Reduction and Social Development Division; and (c) developing guidelines and good practices on contractors' codes of conduct and loan covenants in collaboration with the Project Coordination and Procurement Division and Office of the General Counsel.
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¹⁷⁰ TA 5856-REG: *Legal Literacy for Supporting Governance*, for \$500,000, approved on 24 August 1999. p. 145.

¹⁷¹ Loan No. 1897-PAK, for \$243.2 million, and Loan No. 1898-PAK, for \$86.8 million, approved on 20 December 2001.

gender sensitivity training for police forces and the establishment of a legal empowerment fund to advocate for the rights of women and other disadvantaged groups. Similar program lending could be provided to improve the effectiveness of law enforcement agencies in combating human trafficking, including measures to reduce police corruption and protect trafficking survivors. In addition, through its support for private sector development and corporate governance, ADB could promote codes of conduct among firms and business associations to encourage better compliance with core labor standards and national labor laws, and thereby address one of the strong “demand” factors in the human trafficking equation.

6.3 Regional and Subregional Cooperation

For many years, ADB has recognized the benefits of cooperation among countries in the Asia and Pacific region, and has supported both regional and subregional cooperation through various initiatives. The oldest of these initiatives is in the Greater Mekong Subregion (GMS), which includes Cambodia, People’s Republic of China, Lao People’s Democratic Republic, Myanmar, Thailand, and Viet Nam. More recent initiatives have supported various groupings of countries in Southeast Asia and the Pacific, as well as Central Asian Regional Economic Cooperation and South Asia Subregional Economic Cooperation (SASEC). Both ADB’s Poverty Reduction Strategy¹⁷² and Long-Term Strategic Framework¹⁷³ have identified regional cooperation as a key vehicle for promoting poverty reduction and economic development.

ADB’s commitment to regional and subregional cooperation is reflected most recently in a special thematic chapter in its *2001 Annual Report*. The chapter notes the increasing importance of regional integration and cooperation on shared issues to address the forces and consequences of globalization. The chapter also highlights the various dimensions of regional cooperation in Asia and the Pacific, which include not only economic integration, but also cooperation in the areas of social development and social protection, environmental protection and natural resource management, and crime prevention—including regional efforts

¹⁷² ADB. 1999. R179-99: *Fighting Poverty in Asia and the Pacific: The Poverty Reduction Strategy of the Asian Development Bank*, 19 October 1999.

¹⁷³ ADB. 2001. Sec.M17-01: *Long-Term Strategic Framework of Asian Development Bank (2001-2015)*, 21 February.

to combat trafficking of people, especially women and children.

6.3.1 South Asia Subregional Economic Cooperation

Since 1997, ADB has been promoting subregional cooperation in South Asia, most recently through technical assistance for SASEC, involving Bangladesh, Bhutan, India, and Nepal.¹⁷⁴ Through SASEC, ADB has supported the formation of working groups composed of government officials from the four countries to identify possible subprojects in several sectors selected by the participating governments: tourism; transport; trade/investment/private-sector cooperation; energy/power; environment; and information and communication technology. Through the working group process, potential subprojects for bilateral or subregional cooperation have been identified in the transport and energy sectors, and proposals are being formulated for the tourism, trade/investment, and other sectors.

6.3.2 Recommendations

Integrating Trafficking Concerns: Although SASEC is a fairly young initiative, opportunities are already apparent for mainstreaming trafficking and related social development concerns into the design of subprojects and other forms of subregional cooperation. In the transport sector, for example, the good practices supported by ADB, other development agencies, and NGOs in recent highway projects in South Asia can and should be extended to regional transport projects under SASEC. For example, these good practices have included an assessment of the needs of female road workers—who constitute 40% of the road construction workforce in Bhutan—to improve their working conditions and access to basic services for them and their children.¹⁷⁵

In highway projects in India, ADB has partnered with executing agencies and funding agencies such as the United Kingdom's DFID to support information campaigns about the risks of STD transmission for road construction workers and road users.¹⁷⁶ Such risks also appears to have been abated by changes in state government regulations of truckers' work hours: by decreasing the number of hours that truckers can work in

¹⁷⁴ TA 6010-REG: *South Asia Subregional Economic Cooperation II*, for \$500,000, approved on 13 December 2001.

¹⁷⁵ Loan No. 1763-BHU: *Road Improvement*, for \$9.6 million, approved on 3 October 2000.

¹⁷⁶ Loan No. 1839-IND: *Western Transport Corridor*, for \$240 million, approved on 20 September 2001; Loan No. 1870-IND: *West Bengal Corridor Development*, for \$210 million, approved on 11 December 2001.

a given period, the state government of Maharashtra improved highway safety and also reduced truckers' time away from home (and therefore the likelihood that the truckers would patronize commercial sex workers along the trucking route).

The country reports for this RETA also include examples of innovative NGO programs to establish and manage information booths at border crossings, bus terminals, and other transit stops to provide safe-migration information and assistance to travelers, especially women. Likewise, in the manufacturing and tourism sectors, there are opportunities to develop and promote recruitment guidelines and codes of conduct for industry associations to encourage fair labor practices and address the problems of trafficking and sexual exploitation of workers. These examples point to the possibility of addressing concerns about human trafficking through both subregional policy dialogue and subregional project development in key economic sectors.

Assessing Impacts on Vulnerabilities: The findings of this RETA illuminate the extent of migration and trafficking of persons within South Asia, and identify a number of vulnerabilities of high-risk groups, including in particular women and children from ethnic minorities and lower castes or classes, to trafficking. Under these circumstances, the preparation phase of any subregional construction project should include careful consideration of the possible impacts of the project on local populations—including employment opportunities for both men and women, but also the risks that adolescent girls and children may be trafficked into the project area for sex work or child labor. Where it appears that migrant workers will be hired under the project, steps should also be taken to ensure that they are treated fairly and are not subject to exploitative conditions. The terms of reference of the construction supervision consultant could be expanded to include monitoring of these aspects of the project. A code of conduct for construction workers under the project could also be useful. Social impact analysis and development of mitigation measures should also be carried out for investment projects in service sectors, such as tourism.

Links to Social Development Issues in South Asia Subregion: The findings of this RETA also suggest that ADB could play a valuable role in supporting subregional cooperation in the areas of social development, social protection, and migration management, which could address some of the factors that encourage trafficking. For example:

- A regional study could be designed to assess the technical skills needs in selected sectors, to identify appropriate technical schools

in the region, and to harmonize accreditation requirements for technicians across countries. Particular attention could be paid to ensure that the skills training programs would be accessible to young women, and that the resulting accreditation would satisfy emigration requirements (such as Bangladesh's current policy of restricting emigration of unskilled women workers).

- In the area of social protection, a regional study could also be commissioned to examine gaps and disparities in the social safety nets established for workers and their families in South Asian countries, and to recommend public and private mechanisms for strengthening and harmonizing these protections.
- In the area of migration management, a regional study could be developed to analyze worker migration patterns within the subregion (including both regular and irregular migrants), and to recommend mechanisms for regularizing migration and improving migration safety.

These proposals are based loosely on regional studies that have been commissioned through the Working Group on Human Resources Development for the GMS. Although a social or human development working group has not yet been established under SASEC, similar initiatives could be supported through the general allocation of grant funds for subregional cooperation activities in South Asia. These initiatives could form part of a social protection strategy for the subregion. There are also opportunities for mainstreaming trafficking concerns in an ongoing RETA¹⁷⁷ for example, by encouraging locally elected women representatives to promote community awareness of trafficking and safe migration training.

6.4 Country Level

6.4.1 Country Poverty Analysis and Poverty Reduction Partnership Agreement

The country poverty analysis is a diagnostic tool used to provide a set of strategic options to assist in determining the mutually agreed goals of ADB assistance with a partner developing member country¹⁷⁸ as set

¹⁷⁷ TA 6008-REG: Gender and Governance Issues in Local Government, for \$600,000, approved on 4 December 2001.

¹⁷⁸ Drawn from *Handbook on Poverty and Social Analysis*, Section II, p. 2-4.

out in the poverty partnership agreement (PPA) and used to guide the ADB CSP. As such, this analysis identifies the characteristics and causes of poverty in a specific country as well as opportunities and constraints for poverty reduction initiatives. The findings also assess where there are gaps in information and suggest where specific studies can be carried out, or areas where government might be required to develop and provide additional information.

This process provides an opportunity to bring trafficking issues into the analysis as potential outcomes from vulnerabilities faced by the poor—particularly women and children. The interplay between policies such as trade, labor, and migration/mobility issues can be incorporated into the overall assessments (for example in the labor market profile), as well as the risks and vulnerabilities profiles suggested in the *Handbook on Poverty and Social Analysis* and *Handbook on Resettlement*. Despite the scope of trafficking and its harmful impacts on the development process in South Asia, governments do not ordinarily establish these links in their own policy processes, and ADB’s analysis could provide leadership in mainstreaming trafficking into this type of overall poverty assessment.

6.4.2 Country Strategy and Program

While combating trafficking is not articulated as a specific objective in any CSP in South Asia or within any project, as discussed in the preceding sections, strategic approaches to poverty reduction can make effective contributions through targeting those most vulnerable to trafficking and ensuring they benefit from project activities; ensuring that ADB operations do not contribute to pushing people into migration and hence vulnerability to trafficking; encouraging safe migration; and, assisting in efforts to stem demand for trafficked labor. Achieving progress on poverty reduction and equitable economic growth goals will reduce vulnerabilities to trafficking identified in this RETA—particularly a reduction in the degree of social exclusion faced by women and other disadvantaged groups.

Project implementers might not have the technical capacities or contractual flexibility to add components suggested in the sections below. NGOs specializing in combating trafficking are active in many areas of South Asia and can be approached to partner with ADB projects for awareness-raising activities or to assist project implementers in identifying who is the most vulnerable to trafficking within a specific community. ADB project components can be used as a platform to broaden the scope

of existing activities without additional funds required. Government counterpart agencies and departments can be encouraged through dialogue with ADB to consider potential links with trafficking, and how these concerns can be mainstreamed into their operations.

ADB also strongly supports gender equality and the empowerment of women as a key facet of poverty reduction. As the work to combat trafficking has demonstrated, gender-based exclusion from development resources and basic needs creates great vulnerability for women and girls to being caught up in trafficking. These same factors also perpetuate the conditions that limit their life options and increase their difficulty to move out of poverty. Empowering women through economic and human capital investments can also facilitate their participation in shaping governance mechanisms to protect women and children from trafficking (e.g., police protection and prosecution of traffickers).

6.5 Project-Level Poverty and Social Analysis

Some general guidelines can be applied during the project preparation process to ensure that links to trafficking and safe migration and any potential to contribute to combating trafficking is identified. The technical assistance fact-finding stage of project preparation provides an opportunity to incorporate trafficking concerns in the IPSA. Additional information and data under the risks and vulnerability profile should be incorporated concerning those most exposed to trafficking. This will point to areas for more detailed investigation during the full PSA at the project design stages.

Guide for Integrating Trafficking Concerns into ADB Operations provides examples of how sector-based ADB-supported activities might contribute to combating trafficking and facilitating safe migration, including suggestions for specific components often incorporated into each sector of activity. These potential contributions can be considered during the feasibility and preparation stages of projects, or links can be made with NGOs or government programming already underway in areas where the project is being implemented. Other donors are also actively involved in many similar activities where ADB is already implementing operations. Components to combat trafficking might be directly linked to existing project activities.

6.6 Policy Dialogue

Policy dialogue concerning trafficking and safe migration can also be incorporated into thematic priority areas.

6.6.1 Gender and Development

As identified in the analysis of the dynamics of trafficking, the low status of women and their exclusion from development opportunities intensify the risks women face. Any support that is provided by government or other development programs to increase women's access to and control of assets and other resources can contribute to reducing their risk not only to trafficking but also to many other harmful situations—for example gender-based violence.

As identified in the **Nepal** CSP, all efforts to close the gender gap “are likely to remain limited unless the gender bias in the social system is reduced, if not eliminated.”¹⁷⁹ Consequently it is proposed that the gender strategy for Nepal and other South Asian counterparts include not only integration of gender and development concerns into projects, but also into assistance to policy support, capacity building, and awareness raising.

ADB could take leadership in demonstrating how poverty reduction programming that is built on women's empowerment can have impacts that include reducing risks to harms such as trafficking. This could be done by tracking trafficking risk indicators in ADB's loan projects and bringing this information into policy dialogue on many issues. Links between women's empowerment in the workplace, safe migration policies that facilitate women's migration without negative impacts such as trafficking, and poverty reduction can be made.

6.6.2 Private Sector Development

Improving corporate governance and corporate responsibility for labor conditions within their operations could be incorporated into capacity building and policy development in these areas. This has already been identified in the recent ADB/ILO RETA on Labor Standards. As identified in the sections above, while many agencies and organizations are investing a great deal of funds and efforts in preventing trafficking

¹⁷⁹ ADB. 2001. *Country Strategy and Program Update (2002-2004)*, Nepal, p. 4.

and address its effects on the survivors, few are seriously addressing the demand for trafficked labor. ILO is working with its private sector partners to reduce the use of child labor, and trafficked labor is a specific category in their campaigns and awareness programs.

Support to ILO from ADB would contribute to combating trafficking, especially associated with ADB projects to support small and medium enterprises. Increasing an understanding of mechanisms that could be used to discourage the use and exploitation of trafficked labor in the informal sector and among small and medium enterprises could contribute significantly to combating trafficking. Leadership can be taken by ADB by visibly monitoring codes of conduct incorporated into contracts with construction contractors and other suppliers for ADB operations. These examples could be used to illustrate how other mechanisms might be adopted to strengthen corporate responsibility to limit illegal labor exploitation and to build capacities among appropriate government departments to monitor these issues in sectors such as export-processing zones, garment and carpet manufacturing, etc. Skill training in nontraditional areas for women can also provide additional opportunities to ensure that women can enter expanding sectors through formal entry points rather than being forced to take low-skilled, casual employment opportunities in informal sectors.

6.6.3 Governance

ADB's continued support for the implementation of the decentralization process offers great potential to build accountability from all levels of government to address human trafficking. Support could be extended in areas such as:

- Capacity building for women elected officials at local and national government levels to encourage their leadership in combating trafficking and understanding links between poverty reduction and building resistance to trafficking;
- Capacity building with municipal government to develop and implement measures to ensure migrant and mobile populations have access to services and economic opportunities and hence reduce their vulnerability to risks such as trafficking;
- Implementing government-sponsored programs to increase birth and marriage registration—a key step in enabling rights of children to be protected, to improve delivery of basic services,

and to track and monitor population movements through issuing identity cards and/or passports; and

- Promoting improved enforcement of existing legislation to combat trafficking. Other funders are supporting police training, awareness among community political leaders, but ADB could reinforce these efforts by raising human trafficking concerns at higher levels in discussions regarding accountability and transparency of local government mechanisms.

6.6.4 Regional Cooperation

Links exist between vulnerabilities to trafficking and regional cooperation activities supported by ADB. These include the impact of improved road networks across borders between Bangladesh, India, and Nepal, along which the vast majority of trafficking women and children travel. Some of the road corridor improvement project activities already underway in **Bangladesh** have considered additional activities such as including information booths at bus shelters close to the border for those seeking help to return home. Other activities like this could be considered along the Bangladesh-India border crossings.

Some activists argue that improving road connections actually drives traffickers further off to rural and remote roads, so the assumption that if the road and transport services improve, so will the flow of traffickers does not necessarily hold true. However, ADB might consider carrying out a more detailed analysis of what the impacts might be along these major transportation corridors.

6.6.5 Aid Agency Cooperation

At the recent South Asia Regional Consultation prior to the Second World Congress Against Commercial Sexual Exploitation of Children held in Yokohama in 2001, many stakeholders raised the importance of development programming—at national levels and among donor agencies—targeting of poverty reduction programming to areas known to have high incidence of trafficking, or to address the specific needs of those most vulnerable. One way to improve a targeted approach is to increase aid agency cooperation. As has been demonstrated in Nepal and Bangladesh through the Inter-Agency Coordination Group on Trafficking and other fora, the exchange of information is an important first step in this direction.

ADB could participate more fully in this type of forum, and in identifying aspects of the NPA it could provide support, not necessarily through stand-alone antitrafficking projects, but through the linking of existing poverty reduction programming, e.g., rural credit programs, water and sanitation projects, etc. Other agencies and international NGO/NGO networks could assist ADB in identifying NGOs with capacities to bring ongoing antitrafficking activities to project areas and to coordinate with project implementers on suitable timing and locations for activities.