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## **The Influence of US Hegemony on the South African Anti-Trafficking in Persons Movement**

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**15 March 2016**

## **Declaration**

I René Puzzo Moodley, do hereby declare that this research is my original work and that to the best of my knowledge and belief, it has neither previously been submitted nor currently being submitted to any other University for a degree or any other award. Where someone else's work has been used, due acknowledgement has been given and reference made accordingly.

Signature:   
Date: 13 March 2016

## **Abstract**

The contemporary movement to end human trafficking rose to prominence in the early to mid 1990s. Following the fall of the Soviet Union, the US found itself in need of new tools to extend its global reach. This report argues that the modern day movement to abolish human trafficking is one of the new tools used to advance US hegemony. South Africa provides a unique context for the study of how US hegemony has been employed through this movement. The rise of this movement coincided with the rise of democracy in the rainbow nation. Under Apartheid, US policy toward South Africa was linked with the fight against communism. The US would channel money to black liberation movements in order to shape their views in a pro-western direction. South Africa was considered important to US economic interests and prosperity. With the communist enemy gone, the US has employed new tools to influence ideology, policy and legislation. Through studying the Anti-Trafficking in Persons (TIP) movement in the South African context, this report analyzes how the movement is a tool of hegemony. Tactics used to gain public consent and legitimize the cause are uncovered, as are coercive measures used to stronghold the South African government to comply with the US.

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## Abbreviations

ACMS	African Centre for Migration & Society	RECLISA	Reducing Exploitive Child Labour in Southern Africa
AFU	Asset Forfeiture Unit	RSA	Republic of South Africa
AIR	American Institute for Research	SACTAP	South African Counter Trafficking Assistance Programme
BCOCC	Border Control Operational Coordinating Committee	SADC	South African Development Community
CCPCJ	UN Commission on Crime Prevention and Criminal Justice	SAPS	South African Police Services
CLPA	Child Labour Program of Action	SWEAT	Sex Workers Education & Advocacy Taskforce
DHA	Department of Home Affairs	TECL	Towards the Elimination of the Worst forms of Child Labour
DOJ	Department of Justice	TIP	Trafficking in Persons
DPCI	Directorate for Priority Crime Investigation (Hawks)	TVPA	Trafficking Victims Protection Act
DSD	Department of Social Development	UN	United Nations
FMSP	Forced Migration Studies Programme	UNESCO	United Nations Educational, Scientific and Cultural Organization
ICE	Immigration & Customs Enforcement	UNHCR	United Nations High Commission for Refugees
IGO	Intergovernmental Organization	UNICEF	United Nations Children's Emergency Fund
ILO	International Labour Organization	UNODC	United Nations Office on Drugs and Crime
IOM	International Organization for Migration	UNISA	University of South Africa
MIDSA	Migration Dialogue for Southern Africa	USAID	United States Agency for International Development
MRA	Migration & Refugee Assistance Office	USD	United States Dollar
NFN	National Freedom Network	US-DOL	United States Department of Labor
NGO	Non-Governmental Organization	US-DOS	United States Department of Defense
NORAD	Norwegian Agency for Development Cooperation	US-INS	United States Immigration and Naturalization Service
NPA	National Prosecuting Authority		
OEDC	Organization for Economic Co-operation & Development		

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## INTRODUCTION

### **Research Aims:**

On April 27, 1994 the people of South Africa cast their vote in the nation's first democratic election. The African National Congress (ANC) held a majority of the vote; Nelson Mandela was sworn in as the country's first black President. During South Africa's transition to democracy, and throughout the Apartheid era, the United States of America (US) funneled millions of dollars to various liberation movements. Under Apartheid, US policy towards South Africa was linked with the fight against communism (Cummings: 1995; Karis: 1986). The US channeled money to underground liberation movements to shape their views in a pro-Western direction, as the future of South Africa was considered important to US economic interests and continued prosperity (Cummings: 1995).

The fall of the Soviet Union and subsequent end of the Cold War led to a new era of US dominance. As the communist enemy disappeared, 'new' threats emerged "to reinvent a multitude of other enemies and dangers" (Aradau, p. 252: 2004). Trafficking in Persons (TIP) became a 'new' threat to US security, resulting in legislation which enabled the US to extend its hegemonic influence (Aradau: 2004; Chuang: 2006). A central component of US anti-trafficking legislation is the annual TIP report which ranks countries based on efforts to fight TIP, imposing economic sanctions on those that do not meet "minimum requirements." The threat of sanctions provides a tool for US hegemony past the Cold War era (Chuang: 2006). The historical timing of the rise of the contemporary movement to end TIP coincided with South Africa's transition to democracy. As the problem of "modern day slavery" has been fought in a way that extends US

international reach, this report aims to uncover the role of US hegemony in South Africa's movement to end human trafficking.

### **Background of the Problem:**

Although media attention has risen sharply over the past two decades, human trafficking is not a recent phenomenon. From the fight to abolish the transatlantic slave trade, to the movement against "white slavery," issues involving forced servitude have historically been fought within the realm of human rights. It is at this junction that the contemporary movement differs from those of the past. The UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children of 2000 (known as the Palermo Protocol) took the issue of human trafficking out of the field of human rights and placed it in the realm of criminal justice and transnational organized crime. Whereas prior international legislation on the topic was based in human rights, the Palermo Protocol falls under the jurisdiction of the UN Commission for Crime Prevention and Criminal Justice (Chuang: 2006).

The Palermo Protocol is fundamental in understanding the rise of US hegemony through the fight against "modern day slavery." According to Anderson and Andrijasevic (2008)

*it is important to remember that the Palermo Protocol, as it is known, is not a human rights instrument. It is an instrument designed to facilitate cooperation between states to combat organized crime, rather than to protect or give restitution to the victims of crime (p. 136)*

Shortly prior to the ratification of the Palermo Protocol, the US passed domestic TIP legislation, the Trafficking Victims Protection Act (TVPA) of 2000 (Chuang, p. 439: 2006). This legislation has provisions which enable the US Department of State (US-DOS) to monitor counter-trafficking measures taken by sovereign states in their efforts to prevent TIP, prosecute traffickers, and protect victims (known as the 3P's). Both the Palermo Protocol and the TVPA are situated in the arena of criminal justice. However, through the 3Ps, victim protection is made a priority of the US to govern through the enforcement of the annual TIP report.

The US-DOS annual TIP report ranks countries' efforts in fighting TIP. Countries that do not meet "minimum standards," as defined by the US, are liable to face economic sanctions. As stated by Chuang (2006):

*the sanctions threat arguably elevates U.S. norms over international norms by giving the former the teeth the latter so often lack. In so doing, the sanctions regime presents a ready opportunity for the United States to impose – by threat of sanctions – its own anti-trafficking paradigm on other states (p. 439).*

The annual TIP report provides the US government the means to influence sovereign states; it serves as the primary coercive tool used to extend US hegemony and ideology.

A central feature in drafting of the Palermo Protocol and the TVPA was an epistemological divide on the topic of sex work. The drafting sessions were heavily lobbied by organizations and influential individuals guided by differing schools of thought: the abolitionist, who believe all sex work is forced due to the exploitative nature of the practice, and those who believed in the autonomy of a woman's choices to enter the trade. The latter feared ideology regarding sex work

would enter the definition of TIP and take much needed resources away from larger problems (Chuang, p. 443-444: 2006). The end product of the Protocol drafting sessions was broadly defined international legislation in relation to concepts in subparagraph (b): “consent” and “exploitation of prostitution of others” (Chuang, p. 445: 2006). This ideological debate has taken over the movement to abolish human trafficking and is a prominent feature of South African anti-trafficking discourse.

TIP is often defined as modern day slavery; however, the debate over sex work has watered down the experiences and overall definition of slavery. Slavery is a condition which requires extreme violence and complete ownership over another. The sex work debate takes away from the horrors of those held captive in slavery for other purposes around the world. During the lead up to the 2010 FIFA World Cup, anti-trafficking awareness campaigns focused almost exclusive attention on sex work, conflating fears of female migrants crossing the border to sell sex out of their own free will with the larger problem of sex slavery; little distinction was drawn between the two (Gould: 2010). Many of the campaigns at this time were funded by the US federal government. Little to no attention was paid to the larger issue of labour trafficking in South Africa during the World Cup.

The disproportionate focus on sex trafficking and not labour trafficking is a problem faced on the African continent as a whole. For example, the case of human trafficking and use of slave labour by the Nestlé Corporation. Recently, this story has gone viral, with Nestlé admitting to use of slave labour in fishing. Some have argued that Nestlé’s motivation to concede the use of slave labour on their ships in Thailand, (which the corporation states it was previously unaware) was to

show accountability while they face a court battle over the use of forced labour in the Ivory Coast (McCarthy: 2016).

Activists have been trying, to little avail, to bring a suit against the profitable organization since 2005 for the corporation's use of trafficked child labour (McCarthy: 2016). Allegedly, children have been taken against their will from Mali to the Ivory Coast where "they were held against their will, beaten, and forced to work long hours for no pay on farms where Nestlé sourced its cocoa" (McCarthy: 2016).

In 2013, after multiple failed battles to hold Nestlé accountable, courts in California decided to take on the case. The case has made its way to the US Supreme Court after a failed plea by Nestlé to dismiss the lawsuit altogether (Reuters, Fortune: 2016; Bernish: 2016). During this period, many anti-slavery advocates have been caught in an ideological debate over sex work, ignoring the larger issue of corporate slave labour completely. NGOs with the mission to fight TIP focus an abundance of their attention on sex trafficking, while the plight of children and adults held in captivity for labour purposes, exemplified in the above case of the Nestlé Corporation, are largely ignored.

Though aware of the use of child labour in the chocolate industry, a prominent counter-trafficking advocate who works with the Gauteng Anti-Trafficking in Persons Task Team was unable to name the organization in question during a 2015 presentation on modern day slavery. The prominent discourse in both the US and South Africa remains, overwhelmingly, on sex work, leaving victims of labour TIP out of the framing narrative. Within the unique socioeconomic context of South Africa, this debate is highly problematic. Women who chose to go into the profession are labeled victims of a slave trade, while labour victims, forced to work

long hours with little to no pay in the fields or in mines, receive little attention and scarce resources due to the Western, ideological debate over the autonomy of a woman's body.

For example, South Africa faces a major problem of slavery and labour exploitation on fishing ships. Although this was mentioned in the 2015 TIP report, it only received one line of attention. Abalone, a mollusk native to the South African coast, is a rare and expensive delicacy; due to demand they are considered endangered and, in 2008, South Africa passed legislation banning abalone fishing (Selby, 2016). This did little to discourage poachers and drove the cost up. Abalone are sold on the black market, poachers have strong ties with transnational organized crime, and have been subject to allegations of human trafficking violations in order to meet the demand (Selby, 2016; Coning and Witbooi, 2015).

The South African constitution is a liberal document, prohibiting discrimination in all its forms. However the nation's legacy of sexual conservatism remains very much a social norm; evident in the extreme levels of stigma attached to sex work (Fick: 2005). Both the country's history of sexual conservatism and strong stigma against sex work provided a place for the above mentioned ideological debate to take hold in the fight against human trafficking.

It is the main argument of this report that the fight against human trafficking within the South African context is not an organic, grassroots movement; it is guided by and funded through a moral agenda. This report argues that the moral paradigm motivating many South African anti-slavery activists legitimizes US hegemony; through the anti-sex work stance, activists consent to the dominant narrative of human trafficking victimization, leaving the profitable, corporate use of slave labour out of the discussion.

## **Research Questions:**

This study aims to expose the role of US hegemony as a central component to the success of the South African Anti-Trafficking in Persons movement. The central research question being addressed in this report is linked to the report's aim:

### Central Research Question:

To what extent is the counter-TIP campaign within South Africa a product of US hegemony?

Four sub-questions are asked to help answer the central research question.

### Sub-questions:

1. How is TIP defined by NGOs and activists?
2. Through the use of images, media and victim representation, how has the anti-trafficking movement presented itself to the public?
3. What are the governing ideologies that have motivated key activists to this cause?
4. How has the role of funding impacted the anti-trafficking movement?

## **Theoretical Framework**

Over the past two decades, there has been an abundance of literature on the topic of TIP. Theoretically, two primary causal factors have been attributed to the movement's rise and subsequent success. One theory argues human trafficking is a response to globalization; it is a growing problem that is organic in nature (Bales: 2000 & 2007; Skinner 2008 & 2010; Batestone: 2007; Nagle: 2008). The contrasting theory rejects this notion and contributes the

modern movement's rise and success to larger issues of politics and hegemony (Desyllas: 2007; Risley: 2015; Chuang: 2007; Aradau: 2004; Kinney: 2006).

In 1807 the British abolished the buying and selling of human beings. By 1900, most every country in the Western Hemisphere had outlawed slavery to varying degrees (Martinez: 2011). Though a starting point, this was not the legal end of slavery. The first international convention to abolish slavery was the 1926 Slavery Convention. This was followed by the 1948 Universal Declaration of Human Rights and the 1956 Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery (Bales, p. 275-276: 2000). Slavery has a long history; measures taken to end the practice did not happen overnight.

Those that use a theoretical framework which links human trafficking with an organic response to globalization, argue that the trade of human beings is one of the most profitable and fastest growing criminal enterprises (Nagel: 2008; Bales: 2000; Skinner: 2008; Batestone: 2007). The statements made on both profit and figures, however, are subject to methodological challenges due to the illicit nature of the action itself (Jahic & Finckenaue: 2005). The theory of organic response to globalization can be found in much of the literature provided by South African anti-trafficking NGOs, as the country is the economic hub of the continent.

While this report does not refute the notion that slavery, while illegal, is still practiced, it does reject the notion that it is a growing problem due to globalization, and that the movement to fight it is an organic response. Taking legal measures to abolish a practice does not lead to its demise; it drives it underground. Slavery, though illegal, still exists; not as an organic response to globalization, but as a practice that, until recently in human history, was both legal and



normalized. The issue of modern day slavery and TIP did not creep up overnight. It has continued despite legal measures to abolish the practice.

Slavery and human trafficking are not new social problems plaguing the human condition. What has changed drastically, is how it has been legally classified and the response to it. Both the Palermo Protocol and the TVPA have taken the fight against slavery out of the human rights framework and placed it in the sphere of organized crime and criminal justice. Through threat of sanctions and moral ideology governing the debate, this has provided the US with a new tool to extend global hegemony.

The theoretical framework guiding this report is the notion of hegemony, as developed by Antonio Gramsci. According to Jackson Lears (1985) “to give Gramsci his due, we need first to recognize that the concept of hegemony has little meaning unless paired with the notion of dominance. For Gramsci, “consent and force nearly always coexist, though one or the other predominates” (p. 568). Lears further stated that rule through dominance is to rule “by monopolizing the instruments of coercion” (p. 568: 1985). Hegemony, in short, is a theory of power. To Gramsci, power was a double sided coin. On one side is consent; the masses consent to the values and ideologies of the dominant class; through consent these values and ideologies are deemed legitimate (Lears, p. 569: 1989).

Our chosen vocabulary furthers consent and legitimacy: “available vocabulary helps mark the boundaries of permissible discourse, discourages the clarification of social alternatives, and makes it difficult for the dispossessed to locate the source of their unease, let alone remedy it” (Lears, p. 569-570: 1989). Within the TIP debate, the vocabulary used to intertwine sex work with sexual servitude causes problems for those who do not adhere to this chosen narrative.

The anti-trafficking movement can be explained by the theory of hegemony. The US has used this movement to extend its hegemony (power) by way of both consent and coercion. Coercive techniques include the annual TIP report provision of the TVPA and threat of economic sanctions. Consent is harder to identify. Language is a valuable tool in studying consent. The counter-trafficking movement, as this report will show, uses language and images which appeal to emotion to legitimize the ideology of the US – the link between sex work and human trafficking. This discourse is fundamentally out of place in the context of South Africa.

Where consent is not given willingly, there are tactics that can be used: consent can be bought; coercion can be applied. The TIP report and threat of economic sanctions is a coercive tactic. Funding for reports and programs buys consent through raising awareness of an issue. Consent can be bought through funding, so long as the issue appeals to emotion and creates, in the eyes of the public, legitimacy for government (ruling class) intervention and control over the problem. This is hegemony.

## **Methodology**

South Africa's transition to democracy coincided with the contemporary movement to abolish human trafficking. Coupled with the vested interest of the US in shaping black liberation movements towards a pro-western ideology under Apartheid, the anti-TIP movement within South Africa provides a unique case study for the imposition of Western, US ideology guiding motivation and response. Further, the transition to democracy opened doors for a multitude of NGOs and international funding, including the Anti-Trafficking in Persons movement.

Research on individual motivations were conducted using the following measures: observations of discussions by key counter-TIP activists at a round table panel discussion on human trafficking I attended in Benoni on 20 February 2015. This discussion provided insights on how the problem is defined beyond the legal definition. Discourse presented by SWEAT and Marcel van der Watt provided insight into the prevailing ideology. As I arrived with the SWEAT representative, I witnessed first-hand how those who advocate for sex worker rights and autonomy are all but ignored. Unfortunately, this is the only non-secondary source I could use in the context of this report. Explanation for my reliance on secondary sources will be provided in the upcoming section on methodological limitations.

Secondary sources used to gain insight on the of ideology and motivation consists of presentations posted online by members of the Gauteng Anti Trafficking in Persons Task Team, and online research of Task Team members. Though semi-structured interviews would have provided far more nuanced, rich and abundant data, secondary sources used provide a different form of data that has value in and of itself. The sources used have provided me the ability to research ideology through the use of language and imagery as an outside observer. Presentations and written commentary on the topic of TIP by members of the Gauteng Task Team are dissected and compartmentalized. Of particular importance is a presentation given by Task Team member Diane Wilkinson to the public on what TIP is and methods one can use to get involved in the anti-trafficking cause. As discussed above in the section on theoretical framework, our chosen vocabulary is a hegemonic tool, wielded to obtain consent for ruling class ideology (Lears: 1985). Deconstructing the chosen vocabulary of Wilkinson's presentation to the public is used as a method to test the role of ideology by a key member of the Gauteng counter-TIP movement. Online research findings from Task Team member blogs and articles, SAPS media

briefings, and print interviews provides further insight into the role of hegemony through language.

This report will research victim representation through both language and image in order to gain an understanding of how the TIP movement has been presented in the South African context. In order to test US ideology as providing a master framing narrative within the case of South Africa, Amy Farrell and Stephanie Fahy's 2009 study on public frames and response is utilized as a method to compare the counter-trafficking movement in South Africa to the movement in the US. Farrell and Fahy analyzed US media representations on TIP over a 16-year period, providing data on how TIP was framed and how the movement evolved with public consent. The Farrell and Fahy study provides an in-depth analysis on representations of TIP, along with the movement's growth through stages of representation in the US counter-TIP movement. This report applies the stages of representation, as defined by Farrell and Fahy (2009), to the movement's overall growth and success in the context of South Africa.

Through the use of Farrell and Fahy's study, a comparison of the evolving framing narrative is made between the movement in the US and South African context. Farrell and Fahy defined frames as the "cognitive structures that help define how one sees the world" (p. 618: 2009). Further "Frames can be manufactured or manipulated by claim makers who use the media to disseminate particular messages to encourage certain interpretations of a social problem and discourage others" (p. 618: 2009). Farrell and Fahy defined this process as "problem framing." Using Farrell and Fahy's study, this report analyzes TIP representations in the South African movement to uncover the ideology and motivations of the counter-trafficking movement, specifically during the lead up to the 2010 FIFA World Cup. Victim representation in awareness

raising initiatives uncovers which cohort of victims (sex, labour, organ harvesting) NGOs were most invested in. Through study of problem framing and awareness raising initiatives during this time, including posters, pamphlets, and the use of the Red Card campaign, this report shows the dominant ideology and motivation of the counter-trafficking movement. The methods used in this report provides detailed data regarding the role of US hegemony in the South African movement by comparing dominant frames and the limiting role of language in constructing the narrative.

In testing hegemony, this report provides detailed data of US federal funding in the South African counter-trafficking movement. As hegemony is a theory of ruling class power, research on funding, how much was spent, and for what cause, is an important component in the study of hegemony.

This report provides figures and accounts of how US funding was used through study of budget data from the US-DOS and US-DOL, fiscal years 2003-2015, along with reports from the Congressional Budget Office on international spending. This uncovered a number of anti-trafficking programs funded by the US, from education to direct intervention in the formation of the TIP provisions of the Children's Act of 2006. Some funding data is provided on US NGOs working in South Africa, such as the A21 campaign. This data was obtained using the Foundation Center's website, which provides publically available tax information on US based philanthropic organizations and NGOs.

## **Methodology and Research Limitations**

The principal limitation of this study is personal in nature. Due to unforeseen circumstances I had to leave South Africa to return to the US. As a result, a bulk of the research had to be conducted overseas. This leaves a gap as I was unable to conduct semi-structured interviews, which may have led to stronger findings. Semi-structured interviews can be conducted easily online, however although I applied online for ethics clearance, I was unable to submit a hard copy of my application or attend an ethics interview for clearance. This is due to a change in visa status that left me unable to legally work or study while in South Africa.

## **Chapter Outline**

Chapter One:

### United States Hegemony and Trafficking in Persons Discourse

This chapter reviews the literature on the anti-trafficking in persons movement. Beginning with the movement to abolish “white slavery,” this chapter reviews literature that outlines the history of the movement and argues that, though the movement to abolish human trafficking has received overwhelming attention over the past two decades, it has a long, rich history steeped in an ideological debate on sex work. This chapter also provides definitions of main terms and concepts, as found in the TVPA and the Palermo Protocol. This chapter continues to discuss the central role of the United States in the drafting and passing of the Palermo Protocol. This chapter argues that the US executive branch of government uses the anti-TIP movement to extend both western ideology and hegemony. The main argument of this chapter is that the use of the global gag order and the annual TIP report are coercive tools of hegemony while the moral debate on sex work provides consent.

Chapter Two:

The South African Counter-Trafficking Movement – an Extension of US Ideology & Hegemony

While chapter one evaluated the literature, arguing that the modern movement is a tool of US hegemony, chapter two reviews the South African counter-trafficking discourse. Beginning with early studies conducted by NGOs, it is the main argument of this chapter that the South African movement has adhered to the same problem frames as its US counterpart. Although more recent studies disprove the notions found in early research, they are dismissed as they do not adhere to the dominant ideology of the west. This chapter also evaluates international response to the early studies, arguing that while these studies adhered to the US ideology, they helped place South Africa on the Tier 2 Watch List of the US TIP report. To strengthen the argument that the South African movement is not an organic response, but instead adheres to a larger agenda that uses morality to gain consent; this chapter includes a section on the 2010 FIFA World Cup. Here, it is argued, an abundance of NGO and media attention was on the role of sex work and a feared increase of sex trafficking, while issues of labour trafficking and exploitation were ignored.

Chapter Three:

Representations and Misrepresentations of Human Trafficking

While chapter two evaluated the discourse to provide evidence to the link between US ideology and the South African movement, chapter three focuses on victim framing through images on posters, awareness raising pamphlets, and the media which are presented by NGOs. Through survey of image portrayal of South African TIP victimization, it is the main argument of this chapter that victim representations have been repackaged from the US movement. This repackaging provides a false illustration of the true face of TIP in South Africa. Further, the images provided show how sex work and TIP are used interchangeably. This chapter also argues

that images serve two goals: they appeal to emotion and frame an issue. Study of victim framing through image provides insight to the master narrative being presented on victimization; who the victims are, where they can be found, and what society can do to help can all be expressed through images. This chapter further argues the dominant sex trafficking narrative was harmful during the 2010 World Cup, as scarce resources were used for an ideologically motivated purpose; leaving an entire cohort of possible TIP victims ignored.

Chapter Four:

#### Ideology and Funding Guiding Response and Policy

The previous chapters provide the narrative of human trafficking portrayed by NGOs. From there, this chapter argues that the narrative of victim representation and the morally charged debate on sex work has been a guiding factor of the Gauteng Anti-Trafficking in Persons Task Team. Member organizations are outlined to show a link between ideology and response. The ideologies that motivate key Task Team members are discussed in this chapter, along with how trafficking is defined and what cohort of victims receive the majority of attention in Task Team efforts. The aim of this chapter is twofold. First, this chapter argues there is a link between the role of faith, ideology and consent, as consent is a central feature of hegemony. Second, this chapter argues that the US has used funding as a coercive tool to impose ideology and govern the way South Africa responds to human trafficking. The section on funding argues that US federal funding has also been used to gain consent; arguing that where consent is not given, it can be purchased.



## **CHAPTER ONE: UNITED STATES HEGEMONY AND TRAFFICKING IN PERSONS DISCOURSE**

Over the past two decades, there has been an abundance of media, political and academic attention on the topic of TIP. The term “human trafficking” has become synonymous with “modern day slavery” (e.g., Feingold: 2005; Aradau: 2004; Chuang: 2006; Tyldum & Brunovskis: 2005; Kinney: 2006; Bernstein 2010). This chapter will address how most of the attention TIP has received held a strong emphasis on woman and sexuality (e.g., Agustin: 2007; Doezema 2000; Bernstein: 2007; Burns: 2015; Chuang: 2010; Desyllas; Risley: 2015).

Through examining literature within the context of the US, it is the main argument of this chapter that the current movement and criminal justice framing seek to serve a greater agenda: the extension of US global hegemony. This chapter will argue that past rhetoric on human trafficking, which held a strong emphasis on abolishing sex work and fears of increased immigration, has been repackaged in the modern discourse in ways that serve a modern agenda. Following this argument, discourse from a number of sources will be used to define the concept of human trafficking, as is provided by the Palermo Protocol and the TVPA of 2000. After human trafficking has been defined, the main argument of this chapter, the role of US hegemony in constructing the movement, will be addressed. In arguing this point, the ideology of the executive branch of US government and how it has been imposed will be discussed, as will the role of the global gag order and the US annual TIP report.

### **1.1 The Anti-Trafficking in Persons Movement: Past Rhetoric, Modern Agenda**

US legislation and international law regarding TIP, historically, have emphasized abolishing the sex trade and restricting migration. According to Jo Doezema, “[m]odern concerns with prostitution and ‘trafficking in women’ have historical precedent in the anti-white-slavery campaigns that occurred at the turn of the century” (p. 23: 2000). Doezema argues that defining “white-slavery” is difficult, as some defined it as “all prostitution” while others “distinguished between movement within a country for prostitution (not white slavery) and international trade (white slavery)” (p. 25: 2000). Through pulling together the various definitions, Doezema defines the term as “the procurement, by force, deceit, or drugs, of a white woman or girl against her will, for prostitution” (p. 25: 2000).

The movement to eradicate white slavery was vast, “there were organizations world-wide devoted to its eradication; it received extensive coverage in the world’s media” (Doezema, p. 25: 2000). Yet research has shown that the actual numbers of victims were low; nowhere near the levels that led to the attention the problem received (Doezema, p. 26: 2000). Adding to this discourse, Jennifer Lobasz states:

*the 1921 and 1933 League of Nations Conventions on the Traffic in Women and Children, and the 1949 UN Convention for the Suppression of the Traffic in Persons and the Exploitation of the Prostitution of Others focused exclusively on forced prostitution* (p. 324: 2009).

TIP and sex work have been linked for over a century. Both in campaigns against TIP and under international law, the movement held an underlying ideology to abolish the sex trade and restrict migration. Anderson and Andrijasevic argue that victim portrayals “invoke an emotional reaction and an image of large numbers, echoing fears of ‘floods’ and ‘hordes’ of (‘illegal’) migrants” (p.

137: 2008). While fear over migration was the dominant emotional response, current discourse invokes pity over fear (p. 137: 2008).

The movement against TIP seemingly disappeared from public attention and then reemerged with renewed vigor. According to Bernstein the movement peaked in the late 1990s, when feminist and faith-based organizations formed transnational alliances. As the UN relied more heavily on NGO involvement, new faith-based and abolitionist NGOs rose and entered the international, political realm specifically to influence this movement (p. 243: 2012). These organizations lobbied for stronger laws to protect the morality of a woman's body from the dangers of sex work.

Taking an ideological stance, abolitionist feminist and faith-based organizations argue that no woman would go into the sex trade out of her own free will; sex work is forced and falls under the umbrella of human trafficking (eg., Chaung: 2006; Bernstein: 2012; Dottridge 2007; Dozema 2000; Desyllas: 2007). While the Christian right contests that sex work equates to slavery on the moral ground that a women's body must be protected from amoral deeds, abolitionist feminists believe that sex work is a harmful symptom of our patriarchal society in which women have fallen victim to slave-like conditions (Desyllas: 2007, Dempsey: 2010, Doezema 1997).

The ideological position against sex work played a fundamental role in the formation of current TIP legislation; “[t]he drafting sessions quickly became a forum for heated debates over global anti-trafficking policy, including whether the international legal definition of trafficking should encompass ‘voluntary’ prostitution” (Chaung, p. 438: 2006). Claudia Aradau explains that the reemergence of the human trafficking movement has:

*been variously linked with the disappearance of the communist enemy and the subsequent need to reinvent a multitude of other enemies and dangers, with the nation-states' pathological reaction to globalization by reasserting sovereignty through controlling cross-border movements, with an 'outdated' imaginary of closed and homogenous communities, or with bureaucratic struggles (p. 252: 2004).*

Numerous scholars have argued that the prominent theory linking globalization to human trafficking is fallacious (Aradau: 2004; Chaung: 2006; Dozema 2000). Scholars contend the same fears of the past regarding sexuality and desire of the US to further its hegemony are the main factors in the current movement (Feingold, 2005; Jahic and Finckenauer, 2005; Bernstein, 2012; Chuang 2006; Kinney, 2006).

The modern day movement, with increased political, media, and educational attention, has allowed the US to position itself in the centre of the debate. Using ideology to increase US hegemony, the contemporary movement has taken TIP out of the margins of human rights law and repositioned it in the realm of international criminal justice (Chuang, p.441: 2006; Kinney, p. 165-167: 2006; Jahic & Finckenauer, p. 24: 2005). Chuang contests that the rise of the women's rights movement in the early 1990s brought attention to the problem of TIP to the world stage. Labour migration and issues of transnational organized crime coincided with the rise of the movement against modern day slavery, gaining the attention of governments, lumping the three problems together as one. This formed the early development of the modern day anti-trafficking movement (Chuang, p. 441: 2006).

Led largely by US intervention, the UN sponsored a series of international treaties to battle the evils of TIP (Chuang, p. 442: 2006; Kinney, p. 165-266: 2006). As argued by Chuang, “[o]nce an issue relegated to the margins of international human rights discourse, human trafficking has rapidly become a mainstream political concern, both internationally and domestically” (p. 438 2006). The push by the US to end TIP saw a rapid expansion of anti-trafficking legislation, mainly due to the moral character it undertook. According to Galma Jahic and James O. Finckenaure, abolitionist rhetoric overtook legislative discussion at the expense of other forms of trafficking victimization (p. 25: 2005).

The US positioned itself as the “global sheriff on trafficking”, by spearheading the contemporary movement with the same historical moral agenda of ending sex trafficking, defined by some as all forms of sex work (Chuang, p. 436: 2006). This allowed the US to impose domestic legislation which other sovereign nations are forced to follow (eg., Risley, 2015; Dottridge, 2006; Chuang 2006; Chuang 2014; Dozema, 2005).

Gaining consensus to quickly pass TIP legislation and position itself in the center of the debate was an easy task for the US. As Claudia Aradau states, “political actions depend on and are limited by emotions...emotions become a technology of government to the extent that they can be used to steer citizens’ actions” (p. 255: 2004). As discussed, it becomes clear how and why the issue of sex work has taken center stage in the fight to end human trafficking.

Risk and pity are employed when making an appeal to emotion; however, “[p]ity cannot work for those who are deemed responsible for the ills that have befallen them or those who are considered dangerous to the community” (Aradau, p. 258: 2004). By employing “pity” as a tactic, sex workers are considered as both victims (of exploitation by pimps and traffickers) and

criminals at the same time. Many anti-trafficking NGOs take this position as it enables them to pity someone who has chosen to go into a profession they deem immoral at its core.

As an emotionally laden term, human trafficking has been recast as “modern day slavery.” The word “slavery” is an example of how the specific language used aided the hegemonic agenda; the emotion it elicits is so horrific any action taken to prevent it can be justified. By positioning the fight against human trafficking in such a context, the US has successfully gained consent to extend its international reach. It has placed itself at the center of debates on the topic, and has played a crucial role in the formation of international law. Modern legislation and definitions of TIP are crucial topics in understanding how the current movement has created a space for the US to extend its hegemonic reach. The following subsection will define TIP and outline how the legislation has served the US agenda.

### 1.1.1 Defining Human Trafficking

In January 1999, the US introduced to the UN the first draft of the Protocol to Suppress, Prevent and Punish Trafficking in Persons, Especially Women and Children. On December 25, 2003, under pressure by the US, the Protocol was enacted (Chuang, p. 442: 2007). Prior to ratification of the UN protocol, US President William J. Clinton passed domestic legislation against TIP, the Trafficking Victims Protection Act (TVPA) of 2000 (Wylter, p.1: 2013).

The TVPA and its provisions played a central role in the formation of the UN Protocol. According to Chuang, the US took center stage in drafting sessions, leading negotiations and influencing the Protocol as it adopted the 3Ps (prosecution, protection, and protection) framework of the Clinton Administration (p. 610: 2014). One may assume international treaties

enacted by the UN would serve as the litmus test on measures to eradicate TIP; it is the TVPA that has enabled the US to police the world and create an international movement based more on ideology than facts and statistics (eg., Chuang, 2007; Chang 2014; Riley 2015; Desyllas 2007; Tyldum & Brunovskis 2005).

Although the term “human trafficking” is used regularly by the media, politicians, and the very NGOs that play a pivotal role in serving ‘victims’, the definition of human trafficking has been cause for debate. The TVPA is 86 pages in length and quite cumbersome for the layman to ascertain a standard definition. In order to provide the best definition of TIP, I have found that the website of the Office of Refugee Resettlement, an office under the US Department of Health and Human Services, provides the most coherent definition. The TVPA defines two forms of human trafficking: sex trafficking and labour trafficking.

Sex trafficking is defined as:

*the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion. Or in which the person induced to perform such act has not attained 18 years of age.*

While labor trafficking is defined as:

*The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery.*

What is not mentioned in these definitions of trafficking are the specific ways the TVPA allows for the extension of US hegemony. The TVPA grants the US executive branch considerable power; each President since its inception has enacted legislation in keeping with his own ideology (Risley: 2015; Chaung; 2014). The ideology of the executive has had global implications, due to the annual TIP report and resulting threats of economic sanctions, global gag orders, and the control of movement of women in vulnerable situations. The role of the executive branch of government and the annual TIP report will be addressed later in this chapter. First, the ways the TVPA influenced UN Protocol will be discussed.

The “3Ps” (prosecution, protection, prevention) provided the framework for the UN trafficking protocol. Mike Dottridge states “[t]he UN Trafficking Protocol, initially debated by UN bodies concerned with transnational crime rather than social or economic issues or human rights, focuses on encouraging states to adopt and enforce laws against trafficking” (p. 5: 2007). More simply put, the “3Ps” took legislation, both US domestic and international, away from the victim-centered, human rights perspective, and placed it within the sphere of the transnational crime and punishment arena. The “3Ps” outline three broad categories under which anti-trafficking measures take place; according to Dottridge these categories include the following:

1. Law enforcement measures to detect, prosecute and punish traffickers (and deter others).
2. Preventive measures to reduce the likelihood that trafficking occurs in the first place.
3. Protection measures, along with various forms of assistance, for individuals who have been trafficked (p. 5: 2007).

The implications of the “3Ps” broad definition on victims of TIP are vast, as “[t]rafficking in persons is a multi-dimensional problem, analyzed and discussed from social, economic,



criminological and other perspectives – and linked to issues such as gender, health, migration, development and economics” (Dottridge, p. 5: 2007). Adding to the debate on the legal definition of TIP, Chuang provides a definition of international legislation on the subject, along with a critique:

*[t]rafficking” is an umbrella term encompassing multiple acts that together can be viewed as a process with different phases: (1) the recruitment or transport of persons; (2) through some form of fraud, force, or coercion; (3) for an exploitative end purpose. Because each phase may involve a variety of different acts – the exploitative purpose might be forced prostitution, agricultural work, or domestic work, among other outcomes – constructing a trafficking definition requires deliberate choices as to what types of actions should fall under its umbrella. (p. 443: 2006).*

The criminal justice perspective, along with the broad categories of the 3Ps, has created legislation that is not always victim centered and has made defining TIP difficult for NGOs and governments. Through discourse on the role of the executive branch of US government and the extension of the global gag order, the following section argues that current legislation has enabled the extension of Western ideology and US global hegemony.

## **1.2 US Hegemony, the Ideology of the Executive & the Global Gag Order**

The movement to eradicate TIP took a fundamental leap during the Clinton Administration, yet it was under the President George W. Bush administration that a strong abolitionist stance against sex work took center stage. “The almost-exclusive focus of the George W. Bush administration

(2001-2009) on sex-sector trafficking and its concomitant goal of seeking to abolish prostitution worldwide provoked considerable conflict” (Chuang, p. 610: 2014). President George W. Bush’s abolitionist position led to a global gag order on US federal funding, both domestically and abroad, and enabled the ideology of the executive to affect many facets of health and human services (Kinney, p. 160: 2006).

According to the National Coalition Against Censorship, the global gag rule’s history dates back to 1961. Historically it was put in place to deter abortion. However, after the passing of the TVPA it was one of the measures the executive branch of the US could enact to deter organizations that serve sex workers (NCAC: 2009). Edi C.M. Kinney argues that the use of the global gag order had vast implications on health and human services NGOs, as they were unable to work with all sectors of society (p. 160: 2006)

In order to grasp the scope of the “global gag” on extending US hegemony, one needs to understand how it works. Regarding TIP:

*the US adopted a policy requiring organizations to endorse a pledge ‘explicitly opposing prostitution and sex trafficking’ as a condition of funding and participation in the government’s programs to prevent the spread of HIV/AIDS and human trafficking (Kinney, p. 161: 2006).*

Plainly put, the global gag order, under the George W. Bush administration, forbid all US funding towards initiatives that, in any way, shape or form, endorsed sex work. This included funding for HIV/AIDS medication for women (and men) who are in the sex trade, and providing sex workers with condoms (Cohen: 2008). The presumption, that providing funding to an

organization that provides services to sex workers will increase the prevalence of TIP, is why the global gag order was implemented (Kinney, p. 161: 2006).

The global gag order demonstrates use of ideology in the extension of US hegemony. Although there was heavy lobbying from abolitionist feminists and faith-based organizations, not everyone involved in the drafting of the TVPA and the Palermo Protocol took this stance. There was also contention over the use of the global gag order. According to Doezema, “The lobby efforts were split into two ‘camps’, deeply divided in their attitudes towards prostitution” (p. 61: 2005). These two “camps” have been at odds ever since. Although abolitionist feminists and faith-based groups supported the initiatives, there was also pressure by non-abolitionist feminists and those working in health and human services in drafting the legislation and against the use of the global gag. Grace Chang and Kathleen Kim argued that the global gag order obstructed collaboration among organizations working with immigration, labour, sex workers, and health and human services (p. 1: 2007)

Instating the global gag and extending its reach to include TIP (i.e., sex work) was one of the first actions President George W. Bush took when he held office. However, his successor, President Barack Obama decided to lift the gag order during the first week of his presidency (Nasaw, 2009). Ideologically, President Obama was against the global gag and placed more emphasis on labour trafficking than his predecessor.

Under the Obama administration, defining human trafficking again became a focal point of debate. Janie Chuang referred to this phenomenon as “exploitation creep.” According to Chuang, under the Obama administration all forced labour has been redefined as TIP, regardless of movement taking place. Further, TIP in all its forms has been labeled “slavery.” This has resulted

in the expansion of narrow legal classification, in regards to rhetoric and law (Chuang, p. 611: 2014). Recasting all trafficking as slavery (even in cases where no movement had occurred) is an excellent method to obtain the support of US voters and key international stake holders. As previously stated, the term “slavery” appeals to emotion and creates what Aradau refers to as a “politics of pity” (p. 254: 2004).

The Obama administration added its own ideological twist to TIP discourse, however the administration did not stray far from the abolitionist policies of the Bush administration. “Specifically, few substantive policy changes have been adopted, and the main pillars of US counter-trafficking policy...Opponents of prostitution can readily find allies in the State Department and other positions of power (Risley P. 229: 2015).

For example, former Secretary of State and current Democratic Presidential hopeful Hillary Clinton praised the Rehab Foundation, an NGO in Costa Rica, during a 2009 speech “celebrating the achievements of the TIP heroes” (Risley, p. 231: 2015). Mrs. Clinton stated that the foundation was an anti-trafficking organization and the founder, Mariliana Morales’, “objective upon establishing the NGO was ‘to help trafficking victims and their families put their ordeal behind them and start new lives’” (Risley, p. 231: 2015).

However, the Rehab Foundation, despite Mrs. Clinton’s statement in her capacity as Secretary of State, is not an anti-trafficking organization. According to Amy Risley “[t]he faith-based organization helps people abandon the commercial sex industry” (p. 230: 2015). This provides insight on the narrative the US government has chosen regarding TIP. Although the global gag order has been lifted, organizations that fight against sex work take centre stage as examples of

heroes in the fight against TIP. Further, they are also awarded a large amount of US federal funding (Risley, p. 231: 2015).

Despite what is clearly an extension of personal ideology guiding US hegemony, renowned journalist, author, and anti-trafficking in persons advocate E. Benjamin Skinner has praised US President George W. Bush as one of the greatest combatants and leaders of the anti-trafficking movement (p. 288: 2008). His abolitionist position against sex work was strongly commended by abolitionist feminists and religious leaders (Desyllas, p. 59: 2007). Sex-workers were, and still are, viewed as “slaves” in need of rescue from the evils of sex work; they are victims of a global trade (eg., Chuang, p. 442-443; Chuang, p. 610: 2014; Desyllas: 2007).

The emphasis on sex trafficking has left TIP victims of other forms of exploitation (labour, street begging, organ harvesting, debt bondage) overlooked and their plight understudied. Although highly commended, President George W. Bush’s use of ideology to shape the debate created a harmful landscape for health and human service workers as it has placed restrictions on the forms of interventions NGOs can provide in initiatives such as public health, HIV/AIDS awareness and prevention, and TIP (Kinney, p. 160: 2006).

Not only did the global gag hinder work in public health, it also created an environment where people in already vulnerable situations fell victim to further marginalization, such as undocumented immigrants and sex workers, who found themselves unable to obtain services due to morality guiding funding and programming (Kinney, p. 160-161: 2006). Although the gag order has been lifted, the debate continues and provides a consensus for the US to extend its hegemonic power to fight TIP at any cost. The following section will discuss the annual TIP

report, arguing that, through threat of economic sanction, it is a coercive tool of hegemony used to force nations with little resources to bend to the will of the US government.

### 1.2.1 The Annual TIP Report

The annual TIP report furthers the scope of US hegemonic reach. Enacted as part of the TVPA, the US-DOS annually ranks countries on their efforts to eradicate human trafficking. Janie Chuang has written extensively on the annual TIP report and has referred to the US as a “global sheriff” when it comes to policing the matter of TIP across the globe (2006). As a part of the TVPA, the logic behind the annual TIP report was a simple sell. As stated by Chuang “[t]he TVPA’s congressional sponsors believed that efforts to prevent trafficking into the United States depended on *other* countries’ efforts to stem trafficking across their borders” (p. 452: 2006).

Through the annual TIP report, the US-DOS ranks countries’ based on a tier system. Countries that do not meet the minimum standards are liable for sanctions. Chuang states, “[u]nder the sanctions regime, the US government may deny non-humanitarian, non-trade-related foreign assistance” (p. 452: 2006). Countries that do not meet the minimum criteria also face US opposition regarding “assistance from international financial institutions and multilateral development banks, such as the International Monetary Fund and the World Bank” (Chuang, p. 452: 2006). Further, according to Risley:

*[t]he main levers of US state power include the ability to determine how counter-trafficking assistance can or cannot be used, to monitor foreign government’s efforts to disrupt the trade in human beings, and to threaten and impose sanctions on countries that fail to meet the united States’ standards (p. 221: 2015)*

Using the TIP report, the US has applied a moral agenda to increase its global dominance. The resulting expansion of US power, fueled by faith and abolitionist feminist ideologies, has rebranded trafficking as modern day “slavery,” and has provided the US *carte blanche* in policing the world through efforts to eradicate TIP.

In compiling the annual TIP report, the US-DOS uses a number of sources, “including US embassies, foreign government officials, international organizations, nongovernmental organizations (NGOs), individuals, and published reports” (Chuang, p. 452: 2006). However, many of the source material is fundamentally flawed, as published reports tend to have methodological and statistical errors (Tyldum and Brunovskis, 2005); NGOs and key stake holders’ agendas have been called into question regarding misrepresentation of definitions of human trafficking and exploitation of the trafficking agenda to support other purposes (Jahic and Finckenauer, 2005; Dottridge 2006); and media reports frame the issue of human trafficking in such a way that it correlates with public policy of the time (Farrell and Fahy: 2009).

According to Suzanne Hoff, the intent of the annual TIP report's ranking system is to “act as a push factor for states to ensure more commitment, including funding commitment, to anti-trafficking programs” (p. 123: 2014). The report is used as a guideline for the US to encourage sovereign states to financially invest in anti-trafficking programs that the US deems are needed. Further, the US contributes a substantial amount of foreign funding towards anti-trafficking programs: “the US government awarded a total of over USD 19 million in 2013” (Hoff, p. 123: 2014). The TIP report and subsequent country ranking is often used as a guideline for anti-trafficking program investment, which is problematic due to methodological problems and its use as a hegemonic tool. Hoff argues that the US tier system “shows the ranking of status quo of

the US's current foreign relationships, instead of their commitment against human trafficking” (p. 123: 2014).

Regardless of methodological problems with source material, the TIP report has been a weapon utilized by the US to police the world. Governments with few resources must scampers to pass and impose legislation based on the will of the US government, unless the country that does not meet the minimum standards is a US ally (Risley, p. 222: 2015). The TVPA includes provisions that enable the US president to waive economic sanctions if doing so is in the best interest of the US, if the president feels a country facing sanctions is trying to comply, or if the president feels sanctions will harm marginalized populations (Risley, p. 222: 2015).

As argued by Hoff, the ranking system often reflects the relationship between the US and sovereign states, as opposed to countries commitment to fight human trafficking (p. 123: 2014). Risley adds to this analysis of the tier system by using the example of Latin America: “[t]he classification of several Latin American nations reveals more about the recent state of inter-American relations than the actual magnitude of trafficking in the Western Hemisphere” (p. 222: 2015). For example, Colombia, one of the US' strongest allies in the region, has been placed in Tier 1 from 2005-2008, “despite reportedly high incidence of sex trafficking to Europe, Japan, the United States, and other destinations” (Riley, p. 222: 2015).

Other Latin American countries have not been as fortunate; Venezuela is a prime example. Under the leadership of President Chavez, the US had a strained relationship with the left wing, socialist nation. Evidence provided by Human Rights Watch and multiple Washington based Think Tanks has claimed human trafficking in Venezuela (during the period of Chavez' leadership) was at roughly the same level as other countries in the region. Yet in 2004 the



country was demoted to a Tier 3 status (Chuang, p. 486: 2006). The sanctioning of Venezuela, a country with limited resources:

*not only foreclosed US direct foreign assistance but also placed at risk up to \$1 billion in loans from international financial institutions, including financing for a \$750 million hydroelectric plant and projects aimed at clean drinking water, Amazon rain forest protection, judicial reform, and better education* (Chuang, p. 447-448: 2006).

Chuang asserts that Venezuela's Tier 3 placement and related economic sanctions "was just another instance of the United States using its economic leverage to defeat Marxist regimes" (p. 486: 2006).

Herein lays the core issues within the contemporary movement to end human trafficking. President Clinton's "3Ps", while sounding good on paper, stem from historical fears of migration and sexuality. Further, racism, religious ideology and the need of the US to legitimize hegemony following the fall of the USSR, have contributed to the movement to end "modern-day slavery" (eg., Desylas: 2007; Aradau; 2004; Chuang 2006 & 2014; Kinney: 2006; Dottridge: 2006; Risley: 2015). The push to end TIP has caused victimization of the most marginalized in society, all in the name of protection and prosecution (Desylas: 2007; Dottridge 2006).

The above discourse has outlined the ways that the current movement has used past rhetoric, reminiscent of the movement to abolish "white slavery", for a modern agenda of the extension of US hegemony. Human trafficking, historically fought through the arena of human rights, has been recast as an issue of organized crime and criminal justice. Through recasting TIP as an

issue of international crime, issues such as immigration and smuggling get confused with trafficking. Arguments over the role of sex work add to the difficulty in defining TIP. Declaring that a woman who has chosen to go into sex work is a “slave” is an example of the way language serves to extend hegemony.

Through the use of the global gag order and the annual TIP report, the US has become a “global sheriff” and placed itself as the moral compass on TIP matters. The US president can apply his/her own ideology, redefine the problem, and use the Tier system to sanction countries that do not align with western ideology, such as the case of Venezuela. The TIP report also guides foreign investment. The US is one of the major contributors of international program funding for anti-trafficking initiatives. The TIP report forces countries with scarce resources to comply with the will of the US, or face economic sanction. Through both funding opportunities and fear of sanction, the TIP report has been used to extend US ideology and hegemony. The following chapter argues that South Africa is no exception to this rule.



## **CHAPTER TWO: THE SOUTH AFRICAN COUNTER-TRAFFICKING MOVEMENT – AN EXTENSION OF US IDEOLOGY AND HEGEMONY**

Following South Africa's first democratic elections and the passing of one of the most liberal constitutions came an influx of interest on the future of the rainbow nation. South Africa had the leading economy on the continent and was viewed as the protector of human rights. South Africa's commitment to advance human rights and strong economy saw a rise of immigration from neighbouring countries. Political transition and increased immigration coincided with the rise of the modern day anti-trafficking movement; a movement with an underlying agenda to advance US hegemonic interests.

With increased migration to the country came the Western ideology of sex work and trafficking; fears that people were being trafficked and forced into a life of sexual servitude came to the fore. The previous chapter argued that the movement to abolish TIP has been used by the US as an extension of hegemonic interests. The moral ideology that governs this cause has been used to gain consent; granting legitimacy while the TIP report is a coercive tool. Based off the findings of the previous chapter, it is the main argument of this chapter that the earliest studies on TIP in South Africa applied the US master frame of TIP victimization. These studies led to the formation of the South African anti-trafficking movement, where the ideology conflating sex work and slavery has remained a prominent feature.

In 2013 South African President Jacob Zuma signed into law the country's first legislation devoted specifically to TIP: The Prevention and Combatting of Trafficking in Persons Bill. The legislation was debated in parliament for over five years and was both drafted and passed in

response to international pressure to fully comply with the Palermo Protocol (Hartigh: 2012; Goitom: 2013). This chapter will discuss the reliability of data used in not only the drafting of this bill, but influence on earlier legislation and the US TIP report rankings.

Section One “South Africa – A Review of the Counter-Trafficking Discourse and the Making of a Movement” applies the findings of Farrell and Fahy (2009) to draw comparisons between early South African discourse and the stages the movement took in the US. Here it is shown that the South African movement followed those same three stages of development. Throughout this chapter, I will identify the stages as they come up. Although social and economic problems that plague the US and South Africa are drastically different, the issue of TIP applies the same hegemonic language and victim framing narratives. Due to the social and cultural differences between these two nations, this chapter argues that TIP victim frames of the US do not fit within the South African context. This is followed by a Sub-Section “Reviewing the South African Trafficking in Persons Debate” which examines the TIP discourse following the first major studies. Gould and Fick’s 2008 seminal report “Selling Sex in Cape Town” is used to argue that the early findings could not be substantiated. Although the early claims have been found false, the movement continues to adhere to the problem frames found in the US. Section Two “The FIFA World Cup” provides insight on the success of the movement, despite lack of evidence of a growing problem. Section Three, “Ideology vs. Facts – Skeptics vs. Believers” analyzes the ideological debate that has taken hold in the South African movement, drawing comparisons to the ongoing debate in the US.

## **2.1. South Africa – A Review of the Counter-Trafficking Discourse and the Making of a Movement**

In 2004 South Africa was ranked on the Tier-2 Watch List on the US annual TIP Report. The placement followed reports by the children's rights organization Molo Songololo and the IOM. These reports brought attention to the growing problem of child sex trafficking to the US government (Kreston: 2007). In response to the low ranking, South Africa took a number of measures, including a 2006 Amendment to the Sexual Offenses Act, which included a clause on TIP for sexual exploitation, TIP provisions in the Children's Act, and the TIP discussion paper issued by the South African Law Reform Commission in 2006 (Kreston, p. 40-41: 2007).

South Africa, a country with an abundance of social ills, bent to the will of the US government through the passing of the TIP provisions mentioned above, which took time and resources that a developing country tends to lack.

However, due to the findings of the early reports and the lack of comprehensive legislation specific to human trafficking, South Africa remained on the Watch List until 2009. This was despite efforts to comply with international regulations and follow up studies that disproved the findings of those used to justify the country's low ranking. As will be discussed, it is somewhat ironic that the early reports on TIP in South Africa were used to justify the country's low ranking. The early reports adhered to the problem framing narrative used to draw attention to TIP in the United States, the same country that ranked South Africa on the Tier 2 Watch List.

The studies previously mentioned that were released through the children's rights organization, Molo Songololo (2000a, 2000b) and the International Organization for Migration (IOM) (Martens: 2003), were the first major studies on TIP in South Africa. Molo Songololo put forth the first study: *The Trafficking of Women into the South African Sex Industry* (2000a). According to the report:

*those who want to make money through the prostitution or sexual exploitation of women have traditionally relied on a steady supply of women in order to maximise their profits. Where a supply of women cannot be readily found, an involuntary labour force is coerced into becoming a part of the voiceless, marginalised and unorganised workforce that contributes to domestic and international economies (p. 5: 2000a).*

The notion that sex work is not a field women choose to go into is found throughout the study; those who work in the industry lack autonomy. Migrant sex workers are seen as victims in need of rescue. This follows the problem framing of the movement when it first surfaced in the US, where TIP was framed as a women's rights problem. The problem frame described dangers faced by migrant women and young girls forced into sex work (Farrell & Fahy, p. 620: 2009).

The Molo Songololo report states: "South Africa has not escaped the attention of traffickers as a place to do business and is in fact the destination of choice for many traffickers" (p. 4: 2000a). South Africa as a destination country follows the theoretical context of anti-trafficking advocates in the US that TIP is a growing problem contributed to globalization.

Molo Songololo's second report on TIP focused on sex trafficking in children (2000b). According to the study, a majority of underage sex work is forced; those in the field are victims of TIP (p. 1: 2000b). Researchers have been unable to find evidence to support this claim (Gould & Fick: 2008). The report provided an estimate of 28,000 child prostitutes in South Africa annually (p. 28: 2000b). This figure was cited as part of the rationale for the country's low ranking on the TIP report by the US government (Kreston, p. 37: 2007).

Studies trying to replicate the findings have been unsuccessful; the figure of 28,000 is completely unsubstantiated (Wilkinson & Chiumia: 2013; ACMS: 2014; Gould & Fick: 2008). The use of unsubstantiated, inflated figures, particularly claims of sex TIP and sex work, has been a prominent feature in the fight against TIP in the US, used during times of push for increased, strict legislation (Farrell & Fahy, p. 617: 2006).

Both reports presented by Molo Songololo adhered to early US framing narratives. Each apply a narrow focus on sex trafficking and present TIP as an issue of women's human rights (Farrell & Fahy, p. 620: 2009). The use of unsubstantiated, inflated figures has been identified as both problematic and a means "to garner public support for anti-trafficking programs and legislation" (Farrell & Fahy, p. 617: 2009). There are also problems with definition in the Molo Songololo report; the word "pimp" is used interchangeably with the word "trafficker" (2000b). This is an example of using language as a tool to advance hegemony. Those who are skeptical of the problem, or view it through a different paradigm, face being labeled as sympathetic to human traffickers. For example, when Amnesty International questioned the dominant sex work/human trafficking frame, the organization was called out as being in support of human trafficking (Micklwait: 2015).

These two studies, along with a 2003 report released by the IOM on human trafficking, "placed the issue of human trafficking on the country's national policy agenda" (Gould, p. 183: 2014). While the Molo Songololo reports focused exclusively on South Africa, the IOM report was broader, focusing on the Southern African region as a whole. These reports adhered to the tried and tested method: keep the focus on trafficking for sexual exploitation, provide a link between consensual sex work and trafficking (even if not explicitly stated), and appeal to emotion.



The early reports on human trafficking in South Africa present problem frames that correlate with US framing narratives presented by organizations to the public in early-mid 1990s. When the problem first manifested in the US, women and children were presented as primary victims of TIP for sexual servitude. Trafficking was linked to fears of young children being forced into sex work due to socioeconomic conditions. Farrell and Fahy (2009) described this as the first stage of representation: recognizing the problem of TIP as a violation of human rights (p. 619-621).

These first reports on TIP paved the way for the anti-trafficking movement to take hold in South Africa. They also drew international media attention to the issue. The Molo Songololo report on TIP in children was subject to a media report by the BBC titled “South Africa’s Child Sex Nightmare” (BBC News: 2000). The report claimed that South Africa was home to 38,000 child prostitutes, starting as young as four years old. According to the report, child abduction had risen drastically since the country became a democracy. Researchers attribute this to “increased poverty and unemployment, which have seen families forcing children into prostitution as a source of income” (BBC News: 2000).

The Molo Songololo report provided an unsubstantiated figure of 28,000 child prostitutes in South Africa, which the BBC added an additional 10,000 to the already inflated figure. Though the claims have been found misleading, the earliest of international attention on TIP in South Africa came from these reports (Gould & Fick: 2008; Torres, p. 12: 2010).

The US-DOS 2003 report “Modern Day Slavery in Africa” also highlighted the Molo Songololo report “Molo Songololo, a prominent child rights non-governmental organization (NGO), estimated that there are at least 28,000 children in commercial sexual exploitation in South

Africa's urban centers" (FitzGibbon, p. 83: 2003). The NGO Stop Demand, an organization dedicated to eradicating sex work, pornography and sex trafficking globally, also reported the scope of TIP in South Africa, using findings from the Molo Songololo reports.

Here it was noted that a counter-trafficking Task Team had been set up, and that Molo Songololo was a part of it. According to Stop Demand, the Task Team "formed recently to increase public awareness about child trafficking and prostitution and to push for appropriate legislation" (Smetherham: 2003). According to Monique Emser, the early reports by Molo Songololo were "instrumental in bringing human trafficking to the attention of the government and the public eye" (p. 300: 2013). Emser further stated that the organization contributed in drafting anti-trafficking legislation. This follows the second stage of response as defined by Farrell and Fahy, the problem was recognized and there was an official response, through the formation of the above mentioned Task Team and push for legislation (p. 619: 2009).

### 2.1.1 Reviewing the South African TIP Debate:

According to the executive summary of a Norad review on the IOM's Southern Africa Counter-Trafficking Assistance Programme (SACTAP), anti-trafficking programs throughout southern Africa "were formed to a large extent on the basis of reports published in 2000 (Molo Songololo) and 2003 (IOM), arguing that there was an extensive and increasing human trafficking problem in Southern Africa" (p. 6: 2010). These reports influenced a flood of educational initiatives and training workshops to counter TIP (IRIN: 2008; Wilkinson & Chiumia: 2013). While the studies compiled by Molo Songololo and the IOM (2000-2003) paved the way for the counter-trafficking movement and prominent discourse in a South African context; they also provided a basis for future studies attempting to substantiate the findings.

Cited as the “most methodologically sound research” on the topic of sex trafficking, Chandre Gould and Nick Fick’s seminal study *Selling Sex in Cape Town* (2008) raised a number of questions regarding the nature of human trafficking in South Africa (ACMS, p. 3: 2014). Gould and Fick’s findings provided a sound critique of commonly held assumptions on TIP for sexual exploitation in South Africa. The report was:

*the result of a two year study by the Institute for Security Studies (ISS) and the Sex Worker Education and Advocacy Taskforce (SWEAT) to gather data about the sex work industry in Cape Town and about any evidence of human trafficking into the industry* (Gould & Fick, p. xii: 2008).

Cape Town was chosen as the location of the study for two reasons. First, the willingness of SWEAT, a Cape Town based NGO, to collaborate with ISS gave the researchers access to those in the field; without this partnership, gaining the trust of sex workers could have caused a methodological constraint, impacting the accuracy of the data. Second, the Molo Songololo (2000a; 2000b) and IOM (2003) studies pointed to Cape Town as a “valid location for the research” due to a high rate of tourism and sex workers (Gould and Fick, p. 3: 2008).

To the surprise of the research team, *Selling Sex in Cape Town* disproved many of the notions regarding sex work and trafficking: “[w]e ourselves were surprised by the results. Since our findings identified so few possible victims of trafficking, we decided to look at the data again to see if we could have overlooked anything” (p. 144: 2008). The data discovered eight possible victims of trafficking (p. 150: 2008).

The researchers also found the size of the sex industry in Cape Town was much smaller than previous studies led on: “Despite the commonly held perception that there are large numbers of sex workers selling sex from the street, we found only about 245 streetbased sex workers working in the period February to April 2007” (p. 33: 2008). Accounting sex workers that were home-based, street-based, worked in brothels, and the surrounding Cape Town areas, Gould and Fick provided an annual estimate of 1,209 sex workers in the Cape Town region (p. 33: 2008).

Regarding underage sex workers, Gould and Fick state: “[o]ver the 16 month research period, a total of five children were encountered working as sex workers, all of them street-based” (p. 78: 2008). The underage sex workers that were located were not trafficked into the industry, forced or coerced to sell sex by an adult; the youngest was 13 years old and the oldest 17. The researchers found getting them off the street and into a shelter difficult, as the cut off age for child based social services is 12. SWEAT took the lead to find the youngest support and accommodation to get her off the streets until governmental social services would intervene (p. 79: 2008).

Along with dispelling the myths of high levels of sex work and sex trafficking among both children and adults, Gould and Fick uncovered a number of human rights abuses geared towards sex workers:

*Street-based sex workers experience various forms of physical abuse, violence and corruption at the hands of police. Our survey found that 47 percent of them have been threatened with violence by police, 12 percent have been forced to have sex with police officers (i.e. raped), and 28 percent of sex workers been asked for sex by policemen in exchange for release from custody (p. 55: 2008).*

A 2012 study by Richter et. al, echoed the concerns relating to police abuse and corruption, stating: “studies in South Africa note police confiscation of condoms from sex workers as ‘evidence’ that commercial sex had taken place” (p. 6). South Africa has one of the highest rates of HIV/AIDS in the world; confiscation of condoms violates their human rights as it jeopardizes their health and the health of others.

A brief by the ACMS also made note of the seeming hard time organizations have had in finding victims to substantiate their claim that human trafficking is on the rise. The brief cited that the IOM “found eight cases of trafficking” between 2004 and 2008 (ACMS, p. 3: 2014). This is substantially lower than the IOM’s 2003 study led readers to believe. A Norad report on the IOM’s efforts in Southern Africa found 306 victims had been identified by the IOM between 2004 and 2010; the ACMS brief states “[t]hat is an average of 51 cases per year for the whole region” (Torres: 2010; ACMS, p. 4: 2014). Although often cited, the early reports have “been criticized for methodological problems” (ACMS, p. 3: 2014).

TIP rhetoric within the South African context has shown disproportionate attention to the sex trade, which has been misleading. South Africa has one of the highest gaps between the rich and the poor in the world, along with high levels of gender inequality. Many South African and migrant workers are unskilled to semi-skilled. It is due to these reasons abolitionist ideology can be harmful within South African discourse. According to Lühe, the moral outrage and feminist argument that “sex work is in and by itself a form of abuse as it is involuntary and degrading” has caused a situation in South Africa that “seems devastating” (p. 2: 2012). This is due to the country’s “sky-rocketing rape rate and high incidents of crime coinciding with the criminalized

status of prostitution, sex workers find themselves in an especially vulnerable position” (Lühe, p. 2: 2012).

Though anti-trafficking advocates have trouble proving claims that TIP for sexual exploitation is a growing problem, the movement to abolish human trafficking has continued with a primary, skewed emphasis on sex work. This follows the formula provided by the anti-trafficking movement in the US (Farrell & Fahy: 2009). With inflated claims of the problem dispelled, the notion that human trafficking in South Africa is a growing problem due to the nation being a destination country in a global market falls flat. Yet, the anti-trafficking campaign in South Africa has been extremely successful. The most telling example of the movement’s success is found in relation to mobilization during the 2010 FIFA World Cup.

## **2.2 The FIFA World Cup**

A striking example of the scale of the anti-trafficking movement in South Africa, along with the movements’ ideological motivation, is found in the vast amount of resources, man-hours, and initiatives spent during the lead up to the 2010 FIFA World Cup. While TIP for labour purposes makes up a large percentage of victimization, anti-trafficking organizations placed exclusive attention on the role of sex works relation to TIP. Many were seeking to turn a profit from the games. Those motivated to prevent TIP, in all its forms, largely overlooked victims of labour. Victims may have included street beggars, vendors, and the workers maintaining the upkeep of the stadiums themselves.

Gould argued that leading up to the 2010 World Cup, activists motivated by an abolitionist ideology conflated sex work with TIP to create moral panic over the issue:

*[t]he conflation between sex work and human trafficking is both a consequence of the moral panic generated by media reports...as well as a function of the various agendas of those who were most vocally opposed to human trafficking (Gould, p. 40: 2010).*

Gould maintained the “moral panic” conflating sex work with TIP was largely a response to media reports on the subject (p. 40: 2010). E. Benjamin Skinner, author of *A Crime so Monstrous* (2009) penned an exposé for Time Magazine:



The picture accompanying the editorial (above) provides a visual representation of poverty, loneliness, and hopelessness on the streets of South Africa. The caption of the image, courtesy of time.com, reads “a teenage girl waits near a hotel in Bloemfontein.” This image, like others of its kind, has been used on the home page of prominent anti-trafficking NGOs, such as the National Freedom Network (NFN).

While there is no mention of methodology, Skinner stated he conducted “a three week investigation into human-trafficking syndicates operating near two stadiums.” Skinner argued that South Africa was facing “a lucrative trade in child sex.” He stated sex traffickers were “looking forward” to the upcoming FIFA games and the money they could make off selling (unwilling) sex. Skinner reiterated the inflated and dispelled estimate of 38,000 children trapped in sex slavery. According to the article, “the South African government’s response to child sex trafficking has been superficial or piecemeal.” The article appeals to the emotions of the reader and is a prime example of the media’s role in creating moral panic leading up to the World Cup.

According to the Pew Research Center, Time Magazine’s circulation rate was 3,314,946 in 2010. This figure does not include those who scan through the popular magazine without purchase or online viewings of this specific article. The author, E. Benjamin Skinner, is a well-regarded figure in US journalism and in public policy. Skinner has “served on the World Economic Forum’s Global Agenda Council on Illicit Trade” and has also “served as Special Assistant to Ambassador Richard Holbrooke and as Research Associate for US Foreign Policy at the Council on Foreign Relations” (Brandeis Staff Biography). Further, Skinner was a fellow at the Harvard Kennedy School of Government (2008-2009) and “has testified before Congress and has spoken about slavery to dozens of educational and religious institutions, corporations, conferences, and community organizations” (Brandeis Staff Biography).

Skinner has reach and influence regarding US policy and media perception. Yet he used outdated, unsubstantiated statistics and his warnings regarding South Africa turned out to be false. In his capacity he helped paint a picture of TIP in South Africa that fit the ideology of the

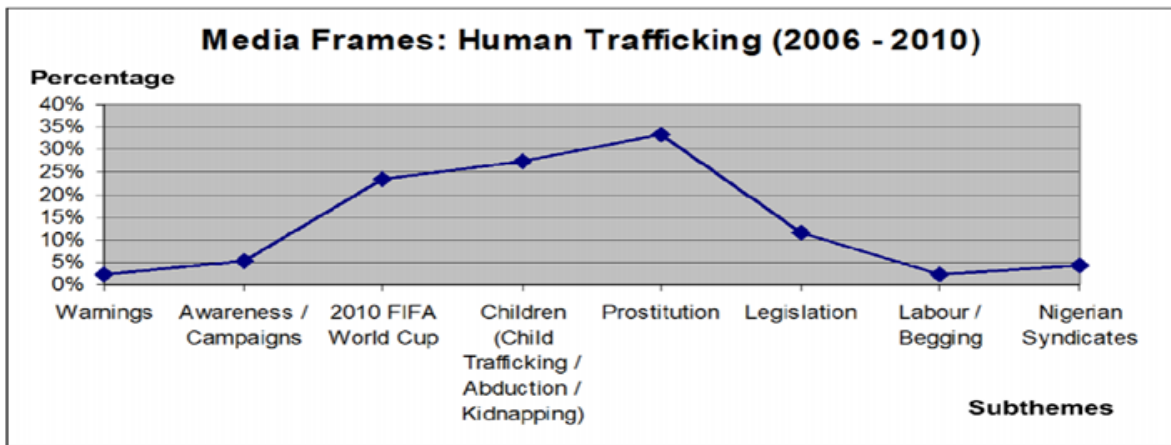


US and added to the growing “moral panic” of sex slavery during the World Cup, while ignoring the issue of labour TIP completely.

Regarding newspaper coverage, research shows “[i]n the run-up to the FIFA World Cup in South Africa, human trafficking made headline news in 27 South African newspapers” (Emser & Francis, p. 169: 2014). Increased media attention regarding TIP during high profile sports games is not unique to South Africa; Germany received similar warnings and public outcry prior to the 2006 World Cup, where research following the games found “evidence of only five cases of trafficking” (Richter et al, p. 4: 2010). Unlike Germany, South Africa is not a Western, developed country. “Other human rights abuses...receive less attention and resources by welfare and advocacy organizations, the media, and government, due to the attention and resources dedicated to human trafficking and prevention (Richter et al, p. 5: 2010).

According to the World Bank, World Development Index, South Africa holds second place in the gap between the rich and poor (2013). With a strong dichotomy separating the nation, and the vast influx of tourism that was expected for the World Cup, an argument could be made that labour trafficking should have generated as much, if not more, media attention than sex trafficking. Based on the table provided below, labour trafficking was all but ignored in South African news paper coverage:

**Table 1:**



Source: Emser & Francis

Emser and Francis argued there was an “upsurge” of media reporting in November to December of 2008, following the release of an IOM report on the topic. The next upsurge was in the months leading up to the World Cup (p. 171-173: 2014). What is of interest is the upsurge following the IOM report, as it provides information on the relationship between NGOs/IGOs and media coverage. This relationship should be cause for concern; the media has been used to manufacture consent for causes deemed worthy (Herman and Chomsky: 2002)

The fear of increased sex work and TIP leading up to the 2010 World Cup, as portrayed in the media, motivated many faith-based and anti-trafficking initiatives to increase their advocacy, prevention, and awareness work. Emser and Francis argued organizations including “Molo Songololo, Justice Acts, Not for Sale, Doctors for Life, STOP (Stop Trafficking of People)” inflated figures during this time which drew attention away from other issues (p. 169: 2014). According to Gould (2010) and Richter et al., (2012) there was no evidence that the World Cup increased sex worker demand. Further, claims that sex trafficking would rise turned out false. However this did little to change the mindset of activists.

### 2.3. Skeptics vs. Believers – The Role of the Ideological Divide

Darshan Vigneswaran, who has worked extensively with the South African counter TIP movement, states the problem with anti-trafficking discourse can be broken down to an epistemological dichotomy between two camps: skeptics and believers (p. 7: 2012). According to Vigneswaran, “[f]or the believers, the problem is one of invisibility” as trafficking is an illicit practice and therefore difficult to quantify (p. 7: 2012). Skeptics disagree; they argue that when study after study continues to turn up few victims, then “activists and scholars involved with planning programmes and interventions should significantly scale back the level of their response” (p. 7: 2012). Vigneswaran states believers “cannot be convinced by methodological reason, if indeed they can be convinced by reason at all” (p. 8: 2012). This is due to the ideological position of believers, who “have developed an interest in trafficking by way of communities of faith” (p. 8: 2012).

Trafficking discourse in both the US and South Africa frequently conflates sex work with TIP. According to Gould, the role of ideology in the South African context is problematic:

*This ideological divide may seem irrelevant to the important task of preventing trafficking from occurring; however, that is not the case. The confusion of definitions presents researchers and law enforcement officials alike with an enormous challenge. Where are we to focus our attention? How are we to count the number of affected people? How do police officers distinguish between self-identified sex workers who have been abused, raped or exploited, and victims of trafficking? Who qualifies for victim support? (p. 21: 2006).*

The ideological debate on sex work and TIP has also been discovered in South African parliamentary proceedings.

The parliamentary library gave Ulrike Lühe access to the Hansards (printed proceedings of sessions of the National Assembly and National Council) to research human rights and sex work discourse (2012). According to Lühe, “[e]ntries on related issues such as ‘trafficking’ also had to be included as sex work was barely ever discussed as an independent topic and rather turned out to be perceived as being inevitably linked to trafficking” (p. 8: 2012). The printed proceedings of parliamentary sessions uncovered parliament’s views of sex workers; they are seen as both victims lacking autonomy and criminal offenders (Lühe, p. 6: 2012). The above points to the Western discourse of politics of “risk and pity,” discussed by Claudia Aradau (2004), being employed by South African parliamentary representatives. Lühe further uncovered a link between immigration and TIP discourse perceived by South African MPs:

*[t]he point is made that after all it is foreigners who either exploit sex workers as pimps, traffickers or even foreign women who engage in a business as immoral and degrading as sex work. The responsibility as well as the blame is thus put on people who are not seen as members of South African society (p. 8: 2012).*

This discourse shares commonalities with the US-DOS, where a clear link exists between immigration due to porous borders; sex workers are viewed through the lens of risk and pity. Within the context of South Africa, this discourse can be dangerous. During times of economic decline, South Africa has seen a number of deadly xenophobic attacks; in 2015 these attacks created a need for refugee camps due to concern for immigrant safety. The discourse on TIP continues to follow the successful formula of the anti-trafficking movement in the US, regardless

of the two countries' contextual differences. According to Farrell and Fahy, this discourse is defined as stage three: redefinition of claims and the rise of a national security frame (p. 622: 2009).

Lühe points to a second problem with conflating sex work with TIP: police corruption and brutality. As had been discussed, South Africa follows the same mindset as the United States: what Ardadu calls “risk and pity” (2004). Sex workers are both criminals and victims of trafficking, based on the narrative set forth. With disproportionate focus on sex trafficking, members of the SAPS have been educated by counter-trafficking NGOs. Many of these NGOs take an anti-sex work stance. Kinnel (2001) in Lühe (2012) points to a problem with increasing anti-sex work campaigns, such as the case of South Africa. Lühe stated: “[r]esearch has even been able to prove a link between an increase in campaigns against prostitution and the number of murders of sex workers” (p. 9: 2012). Research would be needed to assess the extent of this in South Africa, a country known for high levels of police corruption (p. 8: 2012).

Furthering the muddied waters of ideology mixed with law, Gould argues that the study of human trafficking is made harder due to “the politics of sex,” with abolitionist feminists claiming “prostitution is a violation of women’s rights and that any woman who apparently willingly engages in prostitution is merely a victim of male domination” (p. 21: 2006). Gould states:

*the ideological divide in relation to prostitution is set to remain. In the meantime, there is little point in South Africans establishing new laws and dedicating resources to combating trafficking until there is a clear agreement about what it is that needs to be prevented, stopped and controlled (p. 22: 2006).*

Though Gould makes a solid point in the regarding discussion of new legislation, as a signing member of the Palermo Protocol South Africa has an international commitment to pass TIP specific legislation. Further, until such time as legislation is passed and enforced, the US will have cause to put the country back on the TIP Watch List, where it was in 2006 when Gould argued against new legislation.

To conclude, there have been a number of studies published by NGOs, IGOs and the RSA on TIP in South Africa. Their primary focus tends to be on sexual exploitation. Although these reports note that more research is needed in the fields of trafficking for labour and domestic servitude, in the mines, and for organs, they tend to keep the discussion focused on sex work (e.g., Molo Songololo 2000a, 2000b; IOM: 2003; NORAD: 2010; Bermudez: 2008; Allais et al: 2010). The passing of anti-trafficking legislation, while praised by these organizations, can be viewed as an extension of US hegemony as, in order to meet “minimum standards” of the TIP report, the passing of legislation is pivotal. Studies claiming the prominent TIP discourse inflates numbers and creates human rights violations, tend to be ignored, dismissed, or met with the response of “one victim is too many” (Vigneswaran: 2012).

Though placed on the Tier 2 Watch List of the annual TIP report, the early studies and subsequent media attention followed the successful problem framing narrative of the US movement. The above review of South African TIP literature showed adherence to dominant Western discourse and hegemonic language. According to evidence provided by Farrell and Fahy (2009), victim framing in South Africa is consistent to framing in the US. Further, the movement adhered to the same, successful stages as seen in the US. The following chapter will

focus on victim representation through image portrayal, comparing these images to those used in the US.

### **CHAPTER THREE: REPRESENTATIONS AND MISREPRESENTATIONS OF HUMAN TRAFFICKING**

When it comes to violations of human rights, a choice word such as “slavery” invokes a strong emotional response; images do as well. Images break through one’s imagination to present something real that is harder to ignore. Images can be used to illustrate pain that leaves no outward mark. This chapter will present images of South African victim representation provided by dominant NGOs and IGOs. Through comparing these images to those of the anti-trafficking movement in the US, it is the main argument of this chapter that a false representation of victimization has been presented; US based NGOs and US funded IGOs have repackaged American victim portrayals and used them to provide an illustration of TIP victimization in South Africa.

Using the findings of Farrall and Fahy (2009) this chapter argues that the problem framing narratives within the South African context are consistent with those found in the US. This chapter has two sections, the first “TIP Representation: A Comparison of US and South African Victim Portrayals.” Images are provided that are either similar to those found in the US, or have been repackaged by US organizations working in South Africa. Section Two, “Victim Framing During the FIFA World Cup” provides images from the World Cup used by NGOs to increase awareness of sex trafficking and sex work.

This chapter argues that dominant US victim frames do not speak to the reality of TIP victimization in South Africa. Muti increases the demand for body parts, specifically in the albino population; Ukuthwala, forced child marriage, is also practiced in South Africa, however neither act is found in the dominant victim framing; NGOs do not provide illustrations of these



problem. While discussed to an extent in the media, the plight of the Albino community has not found its place in NGO image portrayals. Both muti and ukuthwala are considered forms of TIP. Due to the different nature of TIP victimization, the dominant frames of the US movement are out of place in the context of South Africa.

### 3.1 TIP Representation: A Comparison of US and South African Victim Portrayals

Images are a powerful tool used by the TIP campaign. Within the US context, victims are seldom heard; their plight is represented to us by pictures provided by NGOs, IGOs and the media (Musto, p. 6: 2010). These images portray a narrative to the public of the ‘reality’ of TIP. They follow a formula: taped mouths equal ‘she cannot speak for herself.’ Chains and handcuffs portray slave-like conditions. The images provided by NGOs and the media portray victims as “innocent, naïve, and unable to exercise agency over his or her life” (Musto, p. 6: 2010).

Analyzing images provided by the counter TIP movement in South Africa provides evidence that the ideological abolitionist epistemology of US discourse has made its way to the fore, depicting a false narrative of the reality TIP victimization in the unique context of South Africa.



Source: IOM



Source: Huffington Post

The above images share much in common. They both depict females as commodities; they are speechless victims of an oppressive trade. In each case, the women's mouths are covered; the image in the left is covered in red ink while the image on the right shows a hand covering the victim's mouth. Each image illustrates that she cannot speak for herself. While the image on the left provides a caption with the word "help" the image on the right has the word "help" written on a piece of tape stuck to the girls outstretched hand.

Both images were used in media reports. The image on the left is from a press release by the IOM, welcoming the signing of anti-trafficking legislation into law by South African President Jacob Zuma, while the image on the right is from an article on the Huffington Post titled "The Disturbing Reality of Human Trafficking and Children." Both image portrayals of TIP victimization are remarkably similar; however they depict trafficking victimization in two very different countries, with different socioeconomic, political, and cultural concerns.

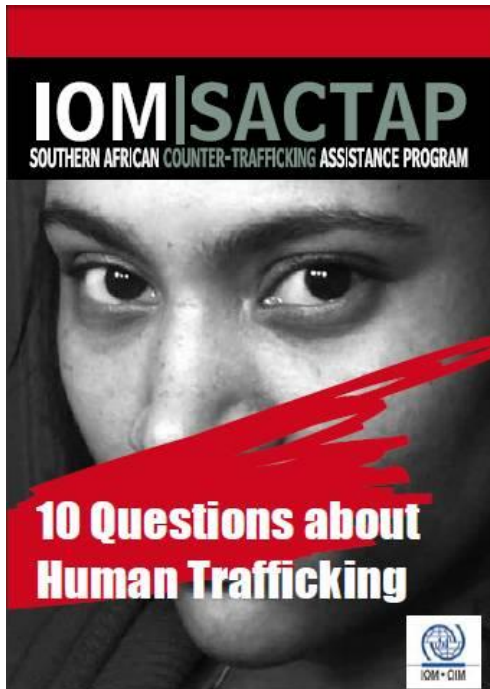


The image above adheres to the TIP victim frame that was most prominent in bringing the issue to public attention in the US; it depicts women as helpless, voiceless agents in danger of sexual exploitation (Musto: 2008, Farrell & Fahy: 2009). The woman in this image has large, wide eyes,

seemingly afraid. The hand over her mouth could easily cover her entire face; it is a males hand and has a darker skin tone than the ‘victim.’ This speaks to fears linking trafficking with immigration, as the person holding her captive is of a different race; he is the outsider.

This image has been used to depict human trafficking in both the US state of Michigan and the South African city of Johannesburg. ABC News at 10 used this image on their website with the title “Michigan’s Commission on Human Trafficking Director visits Marquette”; the image was also used by jhblive to draw awareness to human trafficking in Johannesburg. Jhblive credited Kempton Express for the photo, while ABC News did not provide a photo credit.

The representation of this same image in both the US and South African is not unique to this image alone; many anti-trafficking images used in the US have been repackaged for use in the South African campaign. This is due to the nature of the counter-trafficking movement in South Africa; many of the most prominent campaigns are not South African. The A21 Campaign, Freedom Climb and Not for Sale are US NGOs working in South Africa to combat human trafficking. Additionally, the IOM and Molo Songololo have received funding from the US government for counter-trafficking programs.



The above image graces the cover of an IOM awareness raising pamphlet titled “10 questions about human trafficking.” Question 6 reads: “Who Can Become a Victim?” The answer: “[a]lthough men, women and children are all vulnerable, young women are particularly vulnerable as forcing them into prostitution financially benefits the traffickers” (IOM: 2010). The answers to the 10 questions place emphasis on sex trafficking and sex work, with passing reference to male victims for labour purposes.

This contradicts data put forth by the organization regarding the nature of TIP exploitation in Southern Africa, where a report on the organization’s counter-trafficking programs during fiscal year 2011 revealed that only 9% of victims the organization encountered in the region were trafficked for sexual exploitation (Martens, p. 70: 2012). Stating sex work “financially benefits the traffickers” legitimizes the IOM’s downplaying TIP for other purposes, such as labour.



The image above follows the dominant victim framing narrative. A young woman is enslaved, in need of help, and unable to speak. This image was taken from a TimesLive article on the LexisNexis Human Trafficking Awareness Index on South Africa. The girl in the image appears to be naked. She is in chains. Her face is difficult to see and she is positioned as held captive in confined quarters. Not stated, the image alludes to sex trafficking. The article states:

*a newly released database shows that the main driving factors for human trafficking in South Africa are sexual exploitation, forced labour, drugs and an alarming new trend of parents selling their children for adoptions or sex (Hosken: 2013).*

The excerpt above mentions sex trafficking twice, both at the start and the end of the paragraph. The image provided and the written text contradicts the main point of the article, the findings of the LexisNexis database:

*the database shows that 540 people – 67 of them children – were potentially trafficked into and within South Africa in the last two years, 96 for sexual*

*exploitation, 271 for forced labour, 90 for organ trafficking, four for forced marriages (ukuthwala) and two as drug mules (Hoskin: 2013).*

The image and text of the article, leading up to the LexisNexis figures, emphasize sex TIP. The figures provided by the database paint a contrasting picture. Labour trafficking is more prevalent than sex, 271 potential labour victims to 96 potential sex victims. When the numbers of sex trafficking victims are compared with TIP victims for Muti (organ harvesting), there is only a six person differential. This speaks to the nature of the South African movement, as Muti is not nearly as prevalent in the media, reports, or images that depict victimization. The choice of image shows contemporary discourse clings to the sex trafficking narrative; a more appropriate image have shown a male victim of labour TIP in the mines or fields.



The image above, used for an awareness raising campaign in Cincinnati, Ohio, is the same image as the one used in the media report by Times Live. The difference between the two images is minimal. The image used by Times Live was cropped to provide a close up view of the 'victims'

face and hands, while the image used in the awareness raising campaign in Cincinnati does not show her face; the focus is on captivity by chains on both her hands and feet.



This image appeared in a 2015 SABC News report titled “Human Trafficking on the Rise in SA.” The article discussed a TIP awareness campaign by the Open Door Crisis Care Centre in Durban. In the image we see a row of (white) women, hands behind their back as if cuffed, with a police officer holding more handcuffs. The caption of the photo reads “police have urged the public to be on the lookout for possible cases of human trafficking.”

According to the article: “cases of human trafficking are on the increase in South Africa. The practice often goes hand in hand with prostitution and rape” (Mnguni: 2015). Advocate and senior public prosecutor Val Dafel provided the above information (Mnguni: 2015). According to Dafel, TIP victims are found in court cases and are arrested as prostitutes and illegal immigrants, “one can often pick up that they are the result of human trafficking” (Mnguni: 2015). This is in line with the problem framing narrative as it played out in the US. According to Farrell and Fahy, stage two of the movement is: “working out the definitions: defining

trafficking as a crime” (p. 621: 2009). During this stage, media accounts of TIP were largely associated with sex work and immigration (Farrell & Fahy, p. 621-622: 2009).

Unsurprisingly, this same image, used by SABC News, has also been used by the US media. Carbonated TV, an alternative news website, used this image in an article titled “The 2<sup>nd</sup> Fastest Growing Criminal Industry in the U.S. Is Shocking.” The caption under the image reads: “If you believe human and sex trafficking is a third world country issue than its time to think again” (Carbonated.tv: 2014).

A problem with these images is that their origins are difficult to pin point. Who took the picture and their purpose is unclear due to the image’s use in various human trafficking campaigns and media articles. The images provided in this report are a small sample of victim portrayal by NGOs, educational material, and media coverage on the topic. TIP victim framing follows the formula found in Western discourse (Farrell & Fahy: 2009). Further, the same images are used to represent victimization in South Africa as they are in the US. This serves the purpose of increasing US hegemony through gaining consent for anti-TIP projects with an ideological, anti-sex work agenda, even where figures allude to a growing problem of TIP for labour exploitation.

Public awareness campaigns are not limited to information found on websites, pamphlets and media reports. On 21 September, 2011 the NGO STOP Trafficking of People, with assistance from the Family Policy Institute and the Catholic Parliamentary Liaison Office, held an anti-trafficking protest outside the gates of Parliament in Cape Town. An event invitation was on STOPs website, stating the NGO would “organize the posters, chains and handcuffs...props for the demonstration” (Hofmeyr: 2011). There was no call for male participants or representation of labour TIP.



Below are some images from the STOP protest. The images provide a link between Western ideology and US hegemony in the push for TIP legislation and victim portrayal:



Evident from the images, the STOP protest focused on just one of the many facets of TIP: trafficking in young women for sex work. The images provided by anti-trafficking NGOs keep with the governing ideology of South Africa's earliest reports on human trafficking. Despite

evidence that has proven the findings of these report “misleading” and “inflated,” the South African counter-trafficking movement has continued to ignore recommendations by leading scholars on the topic. When victims of sex trafficking cannot be found, or are found in far fewer numbers than estimated, efforts should be scaled back, or TIP victims for labour purposes should be sought out.

### 3.2. Victim Framing and the 2010 FIFA World Cup:

As discussed in Chapter Two, anti-trafficking organizations increased their awareness raising efforts leading up to, and during, the 2010 FIFA World Cup. Attention on the issue was almost exclusive to sex trafficking and sex work. The image (below) is just one example of the conflation between sex work and TIP during the World Cup.



This image, provided by the IOM, was a feature on anti-trafficking websites and an awareness raising poster in the lead-up to the 2010 World Cup. The woman, face hidden, provocative dress,

hopeless posture while sitting on a bed in a cheap looking room suggests she has fallen victim to sex trafficking. The caption states “Human trafficking is a modern form of slavery that affects 2 million women and children each year world wide.” In regards to the caption accompanying the image, there is no concrete evidence to substantiate the estimate of victims claimed (Gould, p. 42: 2010). According to Gould, NGOs and activists “expressed the belief that thousands of sex workers were expected to travel to South Africa to take advantage of the World Cup, some of these reports also reflected the concern that many of those sex workers would have been trafficked” (p. 36: 2010).

NGOs used the “Red Card campaign” as one of their tools to educate the public on the dangers of sex trafficking during the games. The Red Card campaign began in 2002 by the ILO to draw attention to child exploitation and abuse during international and large scale game events (UNICEF, p. 4: 2010). According to the ILO, “The Red Card campaign was first launched to coincide with the 2002 African Cup of Nations and to highlight the use of child labour in the football stitching industry, which came to light during the UEFA Cup in 1996 (ILO: 2014). During the 2010 World Cup, many abolitionist organizations used the symbolic Red Card to draw attention to human trafficking and sex work.



The above image comes from the Not for Sale campaign, a US NGO with projects overseas, such as in South Africa. Here, the Red Card serves to appeal to emotion. The Red Card is held up, but dripping with blood (one is left to assume from child victims of sex slavery). The statement on the card, arguing that 14 years of age is old “if you’re a sex slave” is not substantiated. Not for Sale used this technique for their own ends, placing emphasis on sexual exploitation and sex work (Gould, p. 36: 2010).

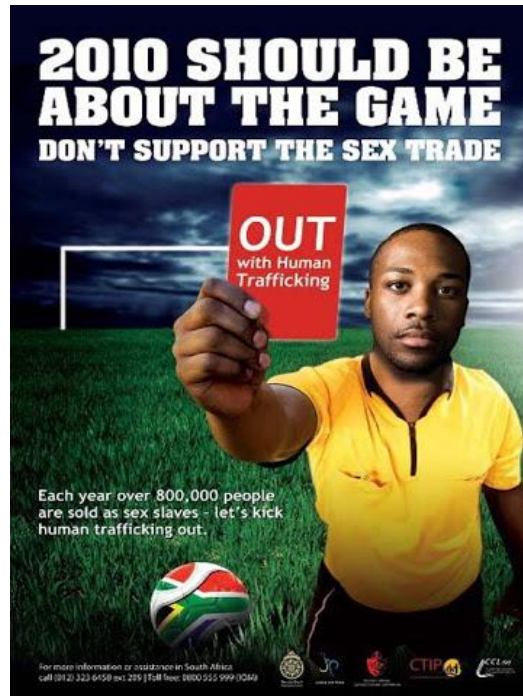


The above image is also from the Not for Sale campaign. It was taken in Cape Town, where volunteers handed out 10,000 Red Cards to draw attention to human trafficking and sex work during the 2010 games.

According to Gould, counter-trafficking campaigns fought on two fronts. On one hand were organizations that “emphasized the horror of trafficking, portraying the victims as distraught young women or children lured into the sex trade against their will” while other campaigns “such as the ‘Red Card’ campaigns, used soccer terminology to draw a parallel between the censure of a referee responding to dangerous or unfair play on the field, and the censure society should place on the practice of trafficking” (p. 34-35: 2010). Although some organizations, such as Not for Sale, used the Red Card campaign to appeal to emotion through visual representation and unfounded claims, other organizations stayed true to the original usage of the Red Card: such as the ILO:



However, with the exception of the ILO, most NGOs and IGOs, while seemingly adhering to the nature of the Red Card campaign, used it to conflate sex work with sex trafficking:



The 2010 FIFA World Cup offered advocates a unique chance to take charge of the campaign through imposition of a (Western) ideology of sex, morality, and abolitionist feminism.

With the vast amount of attention on human sex trafficking and the 2010 FIFA World Cup, one is left questioning the end result. Did tens of thousands migrant sex workers flood the streets in anticipation of the game? Was TIP a major issue for the country during this time? The short answer: No (see Richter et al: 2012; Gould: 2010 for research regarding data supporting the claim that South Africa did not see an upswing of sex work and human trafficking during the 2010 World Cup).

Through imagery and exaggerated claims, abolitionist anti-trafficking organizations used the 2010 FIFA World Cup to legitimize their cause. According to Farrell and Fahy, this is a tactic used in the anti-human trafficking movement in the US: “problem definitions are not simply reflections of political policies. Rather, competing claims makers and political actors manipulate

images of a problem to shape or legitimize particular responses at particular moments” (p. 623: 2009). The 2010 World Cup provided actors a specific moment to legitimize their message; many of the organizations leading the charge, such as the Not for Sale campaign, are larger US based NGOs, shaping the movement within the context of South Africa.

In conclusion, images appeal to emotions; they help the public understand a problem in a matter of seconds. Though an important tactic, use of imagery does not always tell us the whole story. In the case of the anti-trafficking movement in South Africa, the images are downright misleading. Many are reproduced; they have their roots in the US campaign to abolish modern day slavery, as do the organizations that reproduce them. Through appealing to emotion these images provide a consensus on what trafficking is, who the victims are, and legitimize the notion that something must be done to stop the problem. The general population does not know that many of the images are reformatted to fit the South African narrative, nor are they aware of the larger problem of labour trafficking.

The ideologies and representations of trafficked victims presented by NGOs/IGOs with an abolitionist agenda have found a place in policy and response, through NGO that work with regional and provisional anti-trafficking Task Teams. The following chapter will discuss the role of Western ideology and US hegemony in the Gauteng Anti-Trafficking in Persons Task Team (Gauteng Task Team). It will also address the role of US federal funding in the South African counter TIP movement as a method of hegemonic extension.

## **CHAPTER FOUR: IDEOLOGY AND FUNDING GUIDING RESPONSE AND POLICY**

As discussed in the introduction, hegemony is a product of both consent and coercion. This chapter aims to uncover both sides of US hegemony in the South African movement against human trafficking. Chapter two and chapter three argued that the South African movement adheres to US ideologies and problem framing narratives. Through the imposition of US ideology, the South African movement has legitimized US involvement. The ideology that guides the South African movement links sex work with sex trafficking.

Based on the findings of the previous chapters, this chapter argues that NGOs and individuals on the Gauteng Anti Trafficking in Persons Task Team are motivated by faith. The strong stance against sex work that is evident in the South African movement motivates people of faith to consent to the ideology of this movement. They are the believers. They are the ones who work to legitimize the problem.

This chapter also argues that US federal funding is used as a coercive technique; through funding the US has been involved with the passing of legislation, educational initiatives, police trainings, and the training of judges. Both the Task Teams and the programs funded by the US can be explained as products of hegemonic coercion; as discussed in chapter two, in order to keep in line with the US annual TIP report South Africa had to have an official policy and response to the problem of human trafficking. This required funding which the US provided.

The first section of this chapter focuses on the Gauteng Anti Trafficking in Persons Task Team member organizations. A list of NGOs, IGOs and governmental bodies that make up the Task Team is provided and their role on policy evaluated. This is followed by a subsection: “Ideology,



Motivation, and Individual Task Team Members.” Here, the ideologies that motivate key stake holders in the Task Team are discussed. Section two of this chapter, “Following the Money, The Role of U.S. Hegemony and Funding” uncovers US federal funding for South African programs. How much money has gone into the movement, how it was spent, and what these programs sought to accomplish is the focus of this section.

#### **4.1. Member Organizations:**

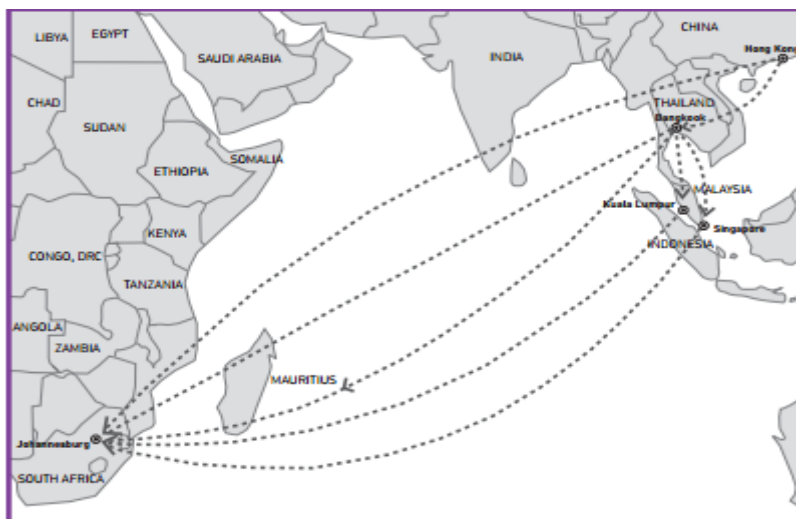
The National Freedom Network (NFN), a faith-based NGO, plays a pivotal role in the Gauteng Anti-Trafficking in Persons Task Team (Gauteng Task Team). The NFN is relatively new to the South African counter-trafficking scene; the organization was formed in 2011. The vision of the NFN is “to have a national network of role players and stake holders working together against human trafficking and exploitation through prevention, protection, prosecuting and partnership” (NFN: 2015). Most information on the Gauteng Task Team is provided by the NFN, including a 34 page document on “Support Structures.” This document provides a list of participating Task Team organizations. Along with the NFN, members include:

- The National Prosecuting Authority (NPA) & the Asset Forfeiture Unit (AFU)
- The Department of Social Development (DSD)
- The South African Police Service (SAPS)
- The Directorate for Priority Crime Investigation (DCPI) also called the Hawks
- Border Control Operational Coordinating Committee (BCOCC)
- Catholic Tip Desk
- Anglican Church
- The Salvation Army
- IOM
- The American Embassy
- UNISA
- The Department of Community Safety
- The Department of Health
- The Department of Labour

- The Department of Justice
- The United Nations Office on Drugs and Crime (UNDOC)

The NFN, the Catholic TiP Desk, the Anglican Church, and the Salvation Army are faith-based organizations. UNISA is the only University that takes part in the Task Team. With the exception of the IOM, the rest are governmental agencies. The NGOs, IGOs and the inclusion of the American Embassy provide framework for an argument of a link between (Western) faith-based ideology and motivation to respond.

The American Embassy is the only foreign Embassy on the Task Team. However, trafficking between the US and South Africa is not an issue. The inclusion of the American Embassy speaks to the fact that the US has established itself as the “global sheriff” on human trafficking. In 2007 UNESCO released a Policy Paper outlining international TIP routes trafficking South Africa. A map of these routes shows a need for inclusion of the Embassy of Thailand and China to be included on the Task Team:



**Source: UNESCO**

More recently, according to the US TIP report: “Officials acknowledged an increased presence of Chinese victims, but Thai women remained the largest identified foreign victim group” (TIP Report, p. 209: 2015). The American Embassy is the only foreign embassy on the Gauteng Task Team, yet a majority of international victims come from Asian countries. Why then is the American Embassy the only foreign embassy on the Team?

As Chuang stated, the US has used the TIP movement as part of its agenda to become a “global sheriff” (2006). The US positioned itself as a key player in response through inclusion on the Gauteng Task Team. The annual TIP report states that “the majority of trafficking victims in South Africa are labor trafficking victims” (p. 310: 2015). Yet, the American Embassy works closely with faith-based, abolitionist organizations. This shows a discrepancy between what the US states and what it does in relation to counter TIP policy in South Africa.

#### 4.1.1. Ideology, Motivation, and Members of the Gauteng Task Team:

Individual members of the NFN serve key roles on the Gauteng Task Team. For example: Diane Wilkinson and Marcel Van der Watt. Wilkinson, on the behalf of the NFN, hosted a TIP awareness presentation on March 14, 2015 at the Honeyridge Baptist Church. Her motivation to join the fight against TIP comes from her faith. She stated TIP “breaks Gods heart. It’s not His desire nor His design for Humanity” (2015). Wilkinson provided the official definition of TIP and added, “what is human trafficking? Very simply put, its modern slavery.”

Wilkinson stated there is a difference between consensual and forced sex work, and that labour trafficking is a larger problem than sex trafficking, yet a majority of her presentation focused on sexual exploitation of women within South Africa and labour exploitation of children in the

chocolate industry in the Ivory Coast and fashion and makeup in India, although she was unaware of what organizations use slavery in chocolate production.

Wilkinson discussed the recruitment process, the “means” of keeping a victim trapped, and exploitation. Although she stated boys and men are recruited through false promises of soccer contracts, further information was not provided on the recruitment of male TIP victims for labour. She also stated that South Africa is in need of a champion for labour trafficking.

In discussing means, she held almost exclusive focus on female victims of sex trafficking. According to Wilkinson, most women are unable to leave due to psychological and emotional trappings. When discussing TIP for sex work Wilkinson remarked:

*more often than not, it's psychological and it's emotional. And this is why you can have a girl standing on a street corner, dressed like a prostitute, um, clearly soliciting, probably even has a cell phone in her hand. There's not a pimp in sight. That doesn't mean she's not trafficked (20:33: 2015).*

Though Wilkinson stated not all prostitutes are TIP victims, the above narrative makes it difficult to differentiate between consensual sex work and a TIP victim.

The woman in the above depiction has methods of escape at her disposal. There is no one watching her; she has the ability to walk away and seek help. Her “cell phone in hand” enables her to call for help. Wilkinson stated the reasons she would stay with her captor. These include: possible threats on her family, threats on her reputation (telling the community she works in the

sex trade as sex work holds a strong negative stigma within the context of South Africa), debt bondage, and Stockholm syndrome.

Wilkinson defined TIP as “modern slavery,” however what she described bears little resemblance to the horrors of what slavery entails. Slavery requires complete ownership over the victim. Debt bondage may be a slave-like practice; however it is not slavery, nor is staying with a captive out of Stockholm syndrome or fear that (he) may tell the victims community that the victimization was sexual in nature. A slave is not allowed a formal community; a slave cannot work off her debt to one day become free. Wilkinson is describing exploitation, yet the link between this form of exploitation and slavery is weak at best. This narrative provides a false illustration of “modern day slavery” victims held captive around the world.

Wilkinson told the audience how they could get involved in the counter TIP movement. She urged the attendants to be conscious consumers. Avoid products produced in certain areas and shop at more expensive outlets, as “you get what you pay for” (2015). She recommended joining the A21 campaign in Randburg, Johannesburg. The campaign leads outreach teams which go to strip clubs, brothels, and hot spots for street based sex work and spread the word of Jesus Christ in an effort to combat TIP. Along with the A21 campaign, Wilkinson mentioned STOP, the IOM, the Salvation Army, and OM South Africa as organizations to get involved with.

When the discussion is dismantled, an ideological link between faith and motivation is established. The campaigns Wilkinson mentioned, such as the A21 campaign and OM South Africa are faith-based, US NGOs working overseas in South Africa. Most important in the fight against TIP, according to Wilkinson, is to pray. The NFN hosts weekly and quarterly prayer

meetings (2015). Using prayer to mobilize against TIP is a practice used in the US, to such an extent that providing even a brief list of organizations that use this tactic would be long.

Wilkinson understands the overabundance of attention on sex work in the counter TIP movement, and argued that South Africa “got stuck” on sex trafficking during the 2010 World Cup (Thelwell et al: 2014). She stated in an interview for News24 that “there are many other kinds of trafficking too and we have a case of forced marriage, organ and body part trafficking, labour trafficking, child trafficking through illegal adoptions, forced begging, forced drug muling and other criminal activities” (Thelwell et al: 2014). According to the article, Wilkinson stated that labour trafficking is more common than other forms (Thelwell et al: 2014).

While the prevalence of labour trafficking victims has been stated by Wilkinson, her background and understanding of TIP is situated within the context of sex trafficking victimization. She is correct in her analysis that South Africa needs a “labour trafficking champion.” Though the NFN is an NGO that brings together relevant stake holders, there remains a need for an organization that focuses on TIP for purposes other than sexual exploitation. This portrays a troubling dichotomy between what is known about TIP and what is being addressed.

Marcel Van der Watt also works with the NFN and is a member the Task Team alongside Wilkinson. Marcel Van der Watt writes a monthly column “Light in the Darkness” on *Gateway News: South Africa’s Christian News Portal*, where he described topics ranging from the role of UNISA on the Task Team to Gods role as the ultimate counter TIP strategist (ven der Watt: 2014).

In one of his monthly columns, titled “Human Trafficking in South Africa: an Elusive Statistical Nightmare”, Marcel Van der Watt discussed the issue of statistics and the inflated figure of 30,000 victims annually (2015). He argued that society is preoccupied with numbers, which “does little to promote understanding of the complex issues associated with human trafficking” (2015). Marcel Van der Witt stated “many labour and sex trafficking victims don’t even know they are victims of a crime” and there is a “possible link between missing persons and human trafficking” (2015). He argued though statistics and in depth research point to a significantly lower problem of TIP, especially sex trafficking, than initially believed, the fight is a noble one. Figures can be misleading, victims do not know they are exploited, and a more qualitative method needs to be used.

Although Marcel Van der Witt’s monthly column may be considered harmless, his position on the Gauteng Task Team and in the NFN put him in a position of education and response. His monthly column provides an in-depth view of his underlying motivations and perspective on the issue. The NFN lists “law enforcement awareness” as one of the NGOs central projects. As listed on the NFN website, the passing of anti-trafficking legislation has left a need to educate police and investigating officers. In order to address this need, the NFN provides TIP information sessions to SAPS “to educate frontline officers about the nature and signs of Human Trafficking” (NFN: 2015). One of the more recent educational initiatives, as posted on the site, was the “SA Law Reform Commission: Information Sessions” (NFN: 2015).

This information session set out to discuss the role of sex work and the “multiple schools of thought and ideologies” around sex work and TIP (NFN: 2015). This sounds promising as the NGO is taking strides to open dialogue on the issue of sex work, the debate to decriminalize the

practice, and its link with TIP. However, Marcel van der Watt was chosen as facilitator. Those who the information session was geared towards included members of the DOJ, the NPA, Hawks (SAPS), SWEAT, UNISA, and the US Embassy.

I attended a 2015 Round Table Discussion on Human Trafficking in Benoni. Also in attendance was Marcel Van der Watt. The sex workers advocacy organization SWEAT was part of the discussion, and was met with hostility by many of in attendance. The person most hostile towards SWEAT was Marcel Van der Watt. Speaking on SWEATs behalf was Dianne Massawe, who discussed the impact the current discourse has on sex workers. She also discussed how decriminalizing sex work could provide the police a valuable ally in the fight against sex trafficking: the sex workers.

Marcel Van der Watt interrupted the discussion to state legalizing sex work has been shown to increase TIP. He pointed to Germany and their regret in legalization (though Germany and South Africa bear little in common). Marcel Van der Watt stated sex work is a threat to morality. The discussion with SWEAT ended there; Dianne Massawe was given far less time to talk than anyone else invited to speak. Based on this exchange, the choice of Marcel Van der Watt, an abolitionist evangelical Christian, to facilitate a discussion on sex work and TIP, puts him in a position to impose ideology over facts through control of discourse.

Marcel Van der Witt wrote about the decimalization debate in an op/ed for IOL News titled “Efforts to dignify SA sex trade” (2014) where he described a panel discussion hosted at UNISA in 2014. According to him, in attendance were representatives from the following agencies: Department of Justice, NPA, Hawks (SAPS) National Reporter on TIP and Sexual Violence



Against Children (Kingdom of Netherlands), SWEAT Gauteng and the US Embassy. Marcel Van der Witt stated during the discussion he:

*continued to think of the wellbeing of our children. Where do they fit into the decriminalization discussion? How is this issue considered within the framework of Section 28 of our Constitution? Shouldn't they be consulted in an age-appropriate manner? Surely our children will be the residents of the village we leave behind as responsible adults. I am convinced that the implications of a decision will differ significantly for a high-end brothel in Cape Town from a poor rural community where, in the event of decriminalization, consent can be purchased and the normalization of prostitution in child-headed households* (Marcel van der Witt: 2014).

Marcel van der Witt's concern of children in rural areas where "consent can be purchased" is similar to the statement of US Deputy Attorney General James Cole (2011):

*Some of our most vulnerable children also face the threat of being victimized by commercial sexual exploitation. Runaways, throwaways, sexual assault victims, and neglected children can be recruited into a violent life of forced prostitution.*

Further, according to the US-DOS (2004):

*The US Government adopted a strong position against legalized prostitution in a December 2002 national Security Presidential Directive based on evidence that prostitution is inherently harmful and dehumanizing, and fuels trafficking in*

*persons, a form of modern-day slavery... children are also trapped in prostitution – despite the fact that international covenants and protocols impose upon state parties an obligation to criminalize the commercial sexual exploitation of children.*

Marcel Van der Witt's concern over the fate of South Africa's children is almost identical to that of the US-DOS. This is not surprising, given that he holds the same ideological position and works with the American Embassy in the Gauteng Task Team.

Marcel Van der Witt's expressed concern for children in rural areas and purchased consent purchased moot; both the Palermo protocol and South African legislation (the Children's Act) make the purchase of sex from a minor a criminal offense. Decriminalization would not change the dynamics that lead to underage sex work or make it a legal, normalized practice.

When isolated, his concern for the morality of the children reads as a noble plea; when placed next to statements made by high ranking US governmental officials and the US-DOS, a trend comes to the fore. A discussion on legalization of sex work seldom takes place in the US without the US-DOS using the moral argument of the impact on children and concern over increased TIP. The argument made by Marcel Van der Witt is not properly placed within the unique context of South Africa, but is one that has been played out in counter-trafficking US discourse for over a decade.

Here lies the problem of inviting faith-based organizations to control the education of SAPS and lead the public prominent discourse on TIP: the motivating ideology cannot be divorced from how they perceive the situation and apply counter measures. The ideology of individual members

on the Gauteng Task Team and organizations tasked with educating those on the “front line” is made clear in news articles, NGO mission statements, and presentations.

On the governmental side of the Task Team is Major General Liziwe Ntshinga, who represents the Directorate for Priority Crime Investigation (DPCI). In a SAPS media statement, 2015/17/30, Maj. Gen. Ntshinga was addressed as the “National Champion of Human Trafficking.” The NFN also identified Maj. Gen. Ntshinga as the “SAPS Champion against Human Trafficking” (NFN: 2015). In an eNCA News interview, Maj. Gen. Ntshinga stated:

*we have more people coming from other countries to South Africa, as we know that research says South Africa is a destination. There are people who are coming from other countries to work as sex workers; that is a trend we are seeing* (Sello: 2015).

The article states: “Ntshinga said most people are trafficked into South Africa and put to work in brothels. *Very few victims are forced to work as labourers*” (Sello: 2015)<sup>1</sup>. Maj. Gen. Ntshingisa has also claimed TIP is a “growing trend” (Moatshe: 2015). She “attributed the problem to transnational organized crime that targeted women from other countries and lured them into South Africa” and “a total of 42 victims were rescued during 2014/2015” (Moatshe: 2015).

Addressing a crowd in Sunnyside, Pretoria, at the launch of an anti-TIP campaign, September 2015, Maj. Gen. Ntshingisa stated: “Traffickers are everywhere; some might even be among us here to spy on our operational plan, so let us be vigilant” (Lt. Netshiunda, p. 9: 2015). Maj. Gen. Ntshingisa discussed TIP alongside brothel raids and the practice of Ukuthwala. She made no

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<sup>1</sup> Italics added by author

mention of labour trafficking. There are a number of frames at play in Maj. Gen. Ntshingisa's statements. There is the ever present conflation between migration, sex work, and TIP. The claim that research states South Africa is a destination for human sex trafficking comes, mainly, from NGO victim portrayal. Further, the notion there are few victims in forced labour is not the case.

It is the current ideology that guides this movement to focus on sex trafficking and conflate it with sex work. Though LexisNexis and the US TIP report (2015) suggest a growing issue of labour trafficking, it remains largely ignored by counter TIP advocates and organizations. According to the NFN, Maj. Gen. Ntshinga approved the faith-based organization to train the 200+ SAPS stations in Gauteng. Wilkinson stated each training costs R2000 (2015). To train the SAPS stations in Gauteng it will cost the NFN +/- R400,000 (roughly 25,000 USD at the time of writing this report), which they collect in donations.

Diane Wilkinson, Marcel van der Watt, and Maj. Gen. Ntshinga are the only individual members of the Gauteng Task Team that could be found through a four month intensive internet based search. This could be due to the fast pace which South African governmental officials change positions and departments and the NFN and its members are tasked with trainings thus more information is available on the organizations members; Maj. Gen. Ntshinga has established herself within the Hawks and on the Task Team as a "champion" with no intention to abandon her cause, unlike others who may not take a strong stance.

TIP is a multi-dimensional problem, yet it is not being countered in a multi dimensional way. Marcel van der Witt stated, "[m]easures to combat the trade cannot be divorced from numerous other structural issues. These include racism, poverty, unemployment, education and inequality – all of which interpenetrate at some point" (2015). With the exception of the IOM, faith-based

abolitionist organizations make up the nongovernmental civil engagement side of fight against TIP both on and off the Gauteng Task Team.

TIP has been taken out of the field of human rights and placed within the realm of international and domestic criminal justice. This leaves a blind spot as poverty, education, gender inequality, unemployment and corruption are issues that may be discussed, but are not being tackled by the counter-trafficking movement. Organizations seeking to tackle these issues may provide vital help in education, training, and identifying ways of preventing TIP. This highlights one of the problems of faith-based motivation in the counter-trafficking movement: it excludes discourse from organizations that do not align with the mission. Without knowing, individuals have been motivated to a cause with a larger agenda: the extension of US hegemony. As long as there are “believers,” the current rhetoric of the counter TIP movement has been legitimized. Further, the criminal justice perspective has allowed faith-based and abolitionist feminist organizations to control the education of those on the front line.

#### **4.2. Following the Money, The role of US Hegemony and Funding:**

As discussed above, the framing of the movement appeals to people of faith. They are motivated to address human trafficking through the current discourse that draws a correlation between trafficking and sex work. This is found in the organizations and individuals that take part in the Gauteng Anti Trafficking in Persons Task Team. The inclusion of NGOs and individuals motivated by faith on the Task Team that aims at addressing both policy and response legitimizes this cause. This is the “consent” side of hegemony.

Through the annual TIP report, the US has been able to extend its hegemony with the threat of sanctions. Sanctions are the coercive side of the hegemonic coin. Economic sanctions are a strong incentive for countries with limited resources, as is the promise of funding. According to Martina Ucnikova, [t]he Organization for Economic Co-operation and Development (OECD) donor countries spend millions of dollars each year on programs to end modern slavery across the globe (p. 133: 2014). Additionally, “between 2003 and 2012 donor countries contributed a combined average of USD 124 million annually” (Ucnikova, p. 133: 2014). A majority of the funding, 75 percent, is provided by three countries: the United States, Norway and Japan (Ucnikova, p. 135: 2014).

#### 4.2.1 US-DOL & USAID Funded Counter-Trafficking Programs

According to the American Institutes for Research (AIR), in 2004 the US-DOL, along with AIR, granted USD 9 million to implement an anti-child trafficking initiative in Southern Africa: the Reducing Exploitive Child Labor in Southern Africa (RECLISA) program. The following countries benefited from the grant: South Africa, Lesotho, Swaziland, Botswana and Namibia (AIR, p. xi: 2008). RECLISA allowed the US to impose ideology and extend hegemony in South Africa through educational initiatives, police training, and legislation.

RECLISA had “[t]hree sites in Gauteng province. A peri-urban, informal settlement near Benoni, and urban setting in Soweto (target of 600 beneficiaries), and the inner-city of Johannesburg where research suggests children are vulnerable to child trafficking (a target of 700 beneficiaries)” (AIR, p. xxi: 2008). The Johannesburg based Khulisa Management Services (Khulisa) served as RECLISA’s implementing partner. Along with the US-DOL, USAID awarded funding to Khulisa to establish “a community collaboration to mitigate the effects of

child trafficking in the Hillbrow and Berea area, which will continue beyond the life of RECLISA” (AIR, p. xxi: 2008).

The US-DOS review *Promising Practices*, stated RECLISA “had a trafficking prevention and policy component. In South Africa, the project developed a referral child trafficking database in five urban centers by surveying 180 local NGOs on services provided and referral protocols” (p. 8: 2012). According to the US-DOS, “RECLISA collaborated with the South African Police Services (SAPS) to include content on child trafficking in their training manuals” (p. 8: 2012). The RECLISA program also worked with the South African Department of Education in “the adoption of the Khulisa-designed life skills curriculum into the Life Orientation subject stream” in the Gauteng region (AIR, p. xv: 2008).

Regarding US funding and direct involvement in South African policy and legislation, RECLISA:

*successfully reviewed South African laws dealing with child trafficking and strengthened institutional capacity to address the crime. It assisted in the passage of the 2006 Children’s Act, the first piece of legislation specifically addressing children* (Promising Practices, p. 8: 2012).

Prior to passing the 2013 anti-trafficking legislation, the Children’s Act was one of South Africa’s strongest pieces of legislation against TIP; the US had a direct role in its formation.

RECLISA was not the only program funded by the US-DOL in the early years of South Africa’s counter-trafficking movement. In 2004, the US-DOL also funded an IOL program, Towards the

Elimination of the worst forms of Child Labour (TECL) “in order to provide technical assistance and to support the implementation of the Child Labour Program of Action (CLPA) across government departments” (Zafar et al., p. 1: 2005). The CLPA worked primarily with the South African Department of Labour and Department of Education; CLPA also collaborated with NGOs working to prevent child TIP and labour exploitation (Zafar et al., p. 1: 2005). According to the US-DOL project summary, in fiscal year 2003 TECL was granted \$5,000,000 to support the Southern Africa region (Botswana, Lesotho, Namibia, Swaziland and South Africa). Though the program was region specific, a majority of the programming initiatives, goals and objectives were geared towards one country: South Africa (USDOL Project Summary).

#### 4.2.2. US-DOS Funded Counter TIP Programs:

The US-DOS provides online detailed data on government funded anti-trafficking programs up to fiscal year 2012. Fiscal years 2013 through 2015 are less detail oriented. According to the Office to Monitor and Combat Trafficking in Persons, following the first reports on TIP (2000-2003) the US-DOS awarded Molo Songololo and the IOM, the organizations that authored the reports, federal grants to continue counter-trafficking work.

The US-DOS awarded 80,000 USD to Molo Songololo for a project titled “Strengthening the fight against Child Trafficking” and 455,000 USD to the IOM, both in 2003. US-DOS archives stated the “IOM will work with member countries of the Southern African Development Community (SADC) on awareness raising capacity-building activities. In its first year, the project will focus on South Africa” (TIP, FY: 2003). Norway granted the IOM 297,597 USD for the project, this formed the beginnings of the IOMs SACTAP program. While the US funded



TECL, CLPA and RECLISA, Norway continued primary funding of the IOM program. The US was the programs second large (and only) international contributor (Vigneswaran, p. 13: 2012).

The US-DOS continued funding Molo Songololo in 2008; 36,000 USD was awarded for a 10 month program to “provide five training workshops to mid-level law enforcement officers” (TIP, FY: 2008). US-DOS funding also went to the non-profit “World Hope International” in the amount of 200,000 USD to “build the capacity of World Hope South Africa... efforts will focus on anti-trafficking in persons awareness raising and prevention campaigns, and strengthening the capacity of the local organization” (TIP, FY, 2010). The International Association for Women Judges, South Africa Chapter was also awarded 200,000 USD in US-DOS funding to develop a TIP resource manual and train judges on issues related to TIP (TIP, FY: 2010).

Following Norway’s discontinued funding for the SACTAP program, the US-DOS awarded the IOM 340,000 USD to “prevent an increase in trafficking in persons by providing funds and technical assistance to local NGOs to conduct counter-trafficking prevention and protection activities in S. Africa during and shortly after the FIFA World Cup” (Vigneswaran, p. 14: 2012; TIP, FY: 2010).

Discussed in Chapter 3, awareness and prevention campaigns focused disproportionately on sex trafficking and sex work, when labour trafficking may have been a larger issue.<sup>2</sup> During the same fiscal year, the US-DOS funded the South African government 64,890 USD: “DHS/ICE Special Agents assisted the SA government in its effort to combat human trafficking” (TIP, FY: 2010). Additionally 40,000 USD was awarded to SAPS to further their TIP training (TIP, FY: 2010).

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<sup>2</sup> As the abundance of attention was placed on sex work and sex trafficking, often conflating the two, it is difficult to ascertain the extent of labour trafficking and exploitation during the 2010 FIFA World Cup.

The US-DOS continued funding of IOM programs in South Africa to an unspecified amount (TIP, FY: 2011). The following year US-DOS awarded 50,000 USD to the South African Government for a program “designed to improve the South African ability to combat trafficking” (TIP, FY 2012). The program also funded training for the “South African Police Services specialized anti-trafficking task force units” (TIP, FY 2012). Between fiscal year 2013-2015 UNODC granted 436,000 USD to combat TIP in the Southern African region, including: Malawi, Mozambique, Seychelles, Zimbabwe, Lesotho, Swaziland and South Africa. The amount and program(s) allocated towards South Africa was not stipulated.

Funding mentioned above comes from the US federal level and not private organizations: for example, the A21 Campaign. According to the A21 Campaign’s form 990, in 2013 a wire transfer in the amount of 45,757 USD went towards their operation in South Africa. The Molo Songololo reports (2000a & 2000b) received charitable funding from the Open Society Institute (OSI) New York. However the amount OSI donated towards these reports is unknown. Though philanthropic organizations form 990s are on public record, it has been over a decade since OSI granted the funding. The form 990 has been archived; OSI funding amounts for these studies cannot be specified in this report. Following the money trail from US NGOs and philanthropic organizations would be a study in itself. Taking this aspect of funding into account, the total (or even a close estimate) of US spending allocated towards the South African counter-trafficking movement is unknown.

The 2003 IOM study was, at least in part, funded by the US-DOS Office of Migration and Refugee Assistance office (MRA). In 2000 the IOM established the Migration Dialogue for Southern Africa (MIDSA) program to work in conjunction with the Southern African Migration

Project (SAMP) (IOM: 2000). MIDSA worked with oversight from UNHCR and the US-INS. As the UN-INS is now a function of the DHS, archived records of direct funding initiatives are not available. However, according to a report from the Congressional Budget Office, the US-DOS Bureau of Population, Refugee, and Migration (PRM) provided fiscal support for the start up of the MIDSA project (Congressional Budget Justification: FY 2004). The IOMs MIDSA program, with unspecified funding from the US-DOS, funded and compiled the 2003 report which paved the way towards the IOM's SACTAP.

From the earliest studies, the US has shown a vested, financial interest in the counter-trafficking programs in South Africa. The US-DOS funded a number of anti-trafficking projects, both governmental and nongovernmental. The US funded South African governmental trainings: from judges to police. The US funded RECLISA program assisted with inclusions of TIP provisions and passage of the 2005 Children's Act. The US has been able to expand hegemony through funding and oversight of these projects. US-DOS provided funded Molo Songololo, though their early studies had been discredited.

Following the findings of the Norad commissioned study on the IOM's SACTAP program, Norway discontinued funding (Torres: 2010). Though the Norad study provided evidence of the IOM's many flaws in the SACTAP counter-trafficking initiatives, the US continued funding the IOM for programs in South and Southern Africa. US-DOS funding went towards awareness campaigns during the 2010 World Cup to prevent human (sex) trafficking. This included giving the IOM discretion in providing funding to local anti-trafficking NGOs.

Hegemony is a product of both consent and coercion. The individual members on the Gauteng Task Team provide consent. Through their work, they have legitimized the notion that human

(sex) trafficking is a growing problem in South Africa, and that action needs to be taken to address the problem. US funding works to both purchase consent, and as a coercive tactic. Developing nations have limited resources to bend to the will of the US; saying ‘no’ to funding for projects the superpower deems important is not an option. Through these programs, the US has influenced legislation, awareness, education, and enforcement. This chapter has outlined how US hegemony, in both consent and coercion, has influenced the anti-trafficking movement in South Africa for over a decade.

## **CONCLUSION:**

This report aimed to expose the role of US hegemony as a central component to the success of the South African anti-Trafficking in Persons movement. The main argument of the report is that the movement to abolish TIP is not organic in nature and does not speak to the truth of TIP victimization, due to the moral position against sex work that motivates activists. The moral, ideological stance of human trafficking advocates within the context of South Africa has served the purpose to advance US hegemony, though legitimizing the cause. This chapter will provide answers to the research questions by summarizing the key findings, discuss the implications of this research, and discuss the negative implications of the anti-trafficking movement on already vulnerable populations in South Africa.

### **Summary of Research Findings:**

Each chapter of this report addressed the central research question: to what extent is the counter-TIP campaign within South Africa a product of US hegemony? Four sub-questions were asked: 1) How is TIP defined by NGOs and activists; 2) Through the use of images, media and victim representations, how has the anti-trafficking movement presented itself to the public; 3) What are the governing ideologies that have motivated key activists to this cause; 4) How has the role of funding impacted the anti-trafficking movement? These questions will be discussed and answered within the following summary.

Chapter One, “United States Hegemony and Trafficking in Persons Discourse” reviewed the literature on the TIP movement to provide evidence that the US has used this movement to advance its own interests internationally. This chapter revealed that the contemporary movement

is not the first of its kind; the movement to abolish “white slavery” also played on fears of immigration and sex work, leading to international anti-slavery legislation. Historically, movements to abolish slavery and human trafficking were fought as and defined as issues of human rights. Like the movement against “white slavery,” today’s fight against slavery is governed by the ideological position against sex work.

Where today’s movement differs drastically, from those of the past, is that it has been redefined as a problem of organized crime and criminal justice. International treaties such as the Palermo Protocol have addressed human trafficking alongside problems of human smuggling and organized crime, with the US leading the charge. Using hegemonic language of “slavery” and appealing to the moral crusade to fight sex work, the US has legitimized both the cause and measures taken to fight it. The US annual TIP report and threat of economic sanctions for governments that do not meet “minimum standards” as defined by the US-DOS has been used as a tool to extend US global hegemony. As evidence in the case of Venezuela, the US government has used the TIP report to sanction regimes that do not comply with US ideology.

Chapter two, “The South African Counter TIP Movement – An Extension of US Ideology and Hegemony” expanded the discourse of the previous chapter and applied it to the South African context. Using the findings of Farrell and Fahy (2009), chapter two evaluated the discourse of the South African movement. It was found that the earliest studies on human trafficking in South Africa applied the same problem frames and abolitionist ideology used in the US campaign to bring the issue to the public’s attention when the US movement first took hold. As discussed in chapter four, the first two studies released by Molo Songololo (2000a, 2000b) and the study by the IOM (Martens: 2003) were funded, at least in part, by the US.

These studies paved the way for the movement to end human trafficking to gain prominence in South Africa, a movement that adhered to the same abolitionist ideology of its Western counterpart. These studies were also used as justification to place South Africa on the Tier 2 Watch List of the US annual TIP report; a coercive, hegemonic feature of this movement which forced the government to bend to the will of the US. This included adding TIP specific amendments to already existing legislation and establishing a Task Team to address the problem. Molo Songololo was a key member of the country's first Task Team.

Chapter two also provided evidence that the claims made by the early studies were false. Methodologically sound studies seeking to replicate the findings of the early studies were unable to uncover a growing problem of sex trafficking and sex work. Though the early studies inflated figures, they were pivotal to the movement's success. As the movement grew it continued to adhere to the same problem frames of its US counterpart; fears of immigration and linking TIP with issues of national security were found in the literature. These problem frames were dominant leading up to, and during, the 2010 FIFA World Cup, where anti-trafficking organizations used the event to bring attention to the problems of not only human trafficking, but also sex work. Framing sex work as slavery led to problems in defining TIP, and provided justification for advocates to overlook the far more prevalent act of labour trafficking. Similar to the case in the US, framing sex work as TIP led South African elected officials to believe the link between the two is absolute. This shows consent to dominant US problem frames, which reinforces US hegemony through this cause. This chapter provides the answer to sub-question 1) "how is TIP defined by NGOs and Activists?" It is defined as a growing problem of sexual exploitation. Following the problem framing narrative of the US movement, it has also been

defined as a problem of national security, as immigrants are overwhelmingly defined as the traffickers.

After examining the discourse of the South African movement, and providing evidence that the movement followed the problem framing narrative of the movement in the US, chapter three “Representations and Misrepresentations of Human Trafficking” sought to uncover the way the South African movement presented victim representation to the public through chosen images. Chapter two argued that there is a link between the narrative of the South African movement and the movement in the US; chapter three added to this argument by analyzing victim representations provided by South African NGOs and media. Images used to portray victimization in the South African context were found to be repackaged from the movement in the US. The same images used to draw attention to the problem in the US were being used to illustrate the problem in a country with unique social, economic, and cultural differences.

Image portrayal of TIP victimization in South Africa holds an almost exclusive focus on sex trafficking, while issues of labour and organ trafficking are seemingly ignored. Muti is not a central feature of the US campaign to end TIP; however it is practiced in the South African context and defined as a form of human trafficking. While the Albino population is most at risk, image portrayals of victims, used to educate the public, ignore this cohort while over-emphasizing sexual exploitation. This could be due to the role of US abolitionist NGOs influence on the South African movement; some of the more prominent NGOs, such as Not for Sale, Freedom Climb and the A21 campaign are US NGOs, operating in South Africa. Both the discourse on TIP discussed in chapter two, and victim representations as seen in chapter three, adheres to the dominant victim framing of the US movement.



This chapter answers sub-question 2) “through the use of images, media and victim representation, how has the anti-trafficking movement presented itself to the public?” The movement is presented in the same way it was in the US. First it is an issue of women’s human rights. An overabundance of TIP victim representations portray the issue as growing for the purpose of sexual slavery. The second way the movement is portrayed to the public is through an anti-immigration lens, media reports and images point to traffickers being outsiders and young girls and women are helpless victims.

Chapter four, “Networks, Organizations and Funding,” addresses how the discourse and victim frames discovered in the subsequent two chapters influences policy, mobilization, and international funding. This chapter provided research on the Gauteng Anti Trafficking in Persons Task Team member organizations and key advocates. This uncovered a strong link between abolitionist ideology and motivation to join the cause. The Task Team is comprised of abolitionist NGOs, the IOM, South African governmental bodies, and the American Embassy. The inclusion of the American Embassy on the Task Team seems out of place, as overseas trafficking syndicates operate primarily in Thailand. The inclusion of abolitionist, faith-based NGOs on the Task Team further adds to confusion on TIP victimization in the context of South Africa. The NGOs are commissioned with the task of educating the SAPS, however key members cannot seem to separate faith from fact, creating bias and a misrepresentation of victimization. This has left SAPS under the impression that labour trafficking is not a pressing concern.

These individuals, who are motivated by faith, legitimize the cause though their inclusion on the Task Team aimed at responding to the problem. This plays to one side of US hegemony; consent.

However, as discussed in chapter two, the Task Team would not have been formed if not for the misguided and methodological challenged findings of early studies. The Molo Songololo studies were funded by philanthropic organizations in Germany and in NYC, while the IOM study was funded, at least in part, by the US-INS, which also oversaw the committee that carried out the work.

This was discovered through researching US funding of South African anti-trafficking programs. The US channeled millions of dollars towards this cause, funding educational programs, NGOs, TIP provisions in legislation, the SAPS, and money granted directly to the South African government, with no mention of how this money was to be spent. Chapter four uncovered both methods needed for hegemony: consent and coercion. Through imposition of the anti-sex work agenda, faith-based organizations gave their consent to this cause, granting it legitimacy. Through funding methodologically challenged research that led to South Africa being ranked on the Tier-2 Watch list of the annual TIP report, South Africa was in no position to refuse US funding and imposition, as the country was in danger of economic sanction. The US funded awareness raising programs; chapter three uncovered that a vast majority of awareness raising initiatives emphasized sexual exploitation over all other forms of TIP.

Chapter four answers sub-questions 3 and 4. 3) “What are the governing ideologies that have motivated key activists to this cause?” Overwhelmingly activists are motivated by faith, while the South African government as a whole has been motivated by coercion. When ranked on the TIP Watch List the government had no choice but to address the problem as both defined and set forth by the US. This links in with sub-question 4) “How has the role of funding impacted the

anti-trafficking movement?” The US government funded many of the programs to address TIP. The prospect of future funding is also a motivating factor.

Funding has shaped the movement, from the first studies on the problem to awareness raising programs during the World Cup. The answer to the above questions along with the findings of this report provides insight to answer the central research question. Based on the information provided in this report, the South African movement to fight human trafficking has been overwhelmingly influenced by US hegemony. Both coercion and consent have played a role in shaping this movement.

### **Implications of Current Discourse**

The anti-trafficking in persons movement in South Africa is not an organic, grass based movement. It is a movement that adheres to the ideologies of the US. Many of the key NGOs fighting this cause are either US based, or have been funded by the US. If not for the low ranking on the US annual TIP report, based on studies that adhered to the problem framing narrative of the US movement and funded by the West, counter-TIP Task Teams would not have been assembled. This report does not argue that slavery, be it sexual or labour, does not exist. This report has argued that the South African anti-trafficking movement is a product of US hegemony and interests. The amount of attention this movement has paid on sex trafficking does not represent the reality of TIP in South Africa. It does, however, motivate faith-based organizations to join the cause, granting it legitimacy.

Vigneswaran (2012) has argued that scholars “need to pay more attention to ‘low’ policy instead of focusing squarely on ‘high’ policy” (p. 8). Low policy issues include kidnapping, smuggling

and labour exploitation, while TIP is a ‘high’ policy issue (p. 8). This is true in the case of South Africa; the same could also be said for countries around the globe. These low policy issues have gotten swept up in the TIP debate. TIP is defined in a very broad manner, making it difficult to differentiate issues of smuggling, kidnapping and labour exploitation from TIP.

The discourse contributes increased kidnappings to trafficking, without any proof that this is the case (see chapter two). As human trafficking has been redefined as a problem of criminal justice and organized crime, border control has been singled out as a means of fighting “modern day slavery.” This has left many immigrants, leaving countries as refugees, with few methods at their disposal to enter a country and apply to stay legally. This highlights one example of how the fight to abolish TIP has had implications on ‘low’ policy issues, such as kidnapping, smuggling and immigration.

With the movement stuck in an ideological debate over the nature of sex work and its relationship to trafficking, those being held in bondage in labour servitude receive less and less attention. It has taken over a decade for the US Supreme Court to hear the case against Nestlé, where children are trafficked and forced to work for the chocolate we eat. This continues while anti-trafficking advocates legitimize the notion that a pimp is a trafficker and a sex worker is a victim of “modern day slavery” who needs to be saved.

Both the role of US hegemony and the abolitionist ideological position have vast, global implications. The 2010 World Cup is a striking example of each. The US funded awareness raising initiatives. These initiatives completely neglected forced labour. Many were looking to make a profit from the games, not just sex workers. While exaggerated claims that traffickers

were looking forward to the game were being made, the relationship between the event and labour bondage went largely ignored.

When Nestlé admitted to the use of slave labour in fishing, The US government closed the loophole that allowed for fish to be imported that were caught by use of slave labour. It was not unknown to the US that this loophole existed. The US is far from the only country that allows for slavery to continue on fishing boats. Although the US has played a fundamental role in the South African anti-trafficking in persons movement, the 2015 TIP report noted that South Africa continues to ignore the problem of male victims of slavery held captive on fishing boats (p. 310). This is mentioned in passing; at the time the 2015 TIP report was being compiled the US was allowing large, profitable corporations to use slave labour on fishing boats for profit in the US.

When we think of people shackled to a boat for months on end, forced to labour without pay, victims of slavery being physically abused, we think of the transatlantic slave trade. Today's fight against slavery does not speak to this. Yet it is happening. It is a reality. It is profitable. Instead NGOs raise awareness of young girls forced into sexual servitude; abolitionist organizations argue that sex work is slavery. Faith guides them, and faith tells them that sex work is a sin. The main concern of abolitionist feminists is breaking down the system of patriarchy. To abolitionist feminists, the patriarchal system views women as sex objects; we are here for the satisfaction of men. All sex work is slavery in this view.

This discourse has vast implications on the modern fight to end the trade in human beings. It has created a sphere where millions of victims are left out of the discourse. Neither group is overly concerned with labour slavery; neither group is poised to fight major profitable corporations for the use of slave labour. They are concerned with the sin of sex work and breaking down the

system of patriarchy. Through funding and direct intervention, the US has reinforced this agenda. The US led the negotiations on the formation of current international law on trafficking. While international law has made provisions for victims of labour trafficking, a vast amount of attention and resources have remained on sex trafficking and sex work (Chuang, p. 1657: 2010). This has left millions of victims held in captivity ignored by anti-slavery organizations that have the resources to fight for their freedom.

### **Recommendations for Future Research**

This report has shown that there is a gap that needs to be filled on TIP for non sex purposes. Reports on trafficking indicate that TIP victims can be found working as beggars on the street, in the fields, in the mines, and as domestic servants. The US TIP Report of 2015 indicated slave labour found in fishing boats off the coast of South Africa. Further research is needed in these areas.

Trafficking advocates indicate a correlation between increased kidnapping and trafficking, however they do not substantiate these claims; this is an area that could use further study. Mutilation as trafficking is another area that deserves research and acknowledgment. The area where research is most needed is related to South Africa's law on human trafficking.

### **Legislation, Emigration/Immigration Regulations, and Human Rights Violations**

On July 29, 2013, South African President Jacob Zuma signed into law the Prevention and Combating of Trafficking in Persons Act. While anti-trafficking in persons advocates rejoiced, the passing of this legislation was largely in response to international pressure (Richter, et al.:

2015). In order to fully comply with the Palermo Protocol, South Africa had to pass legislation specifically addressing human trafficking. Additionally, passing TIP specific legislation is an important step for any country to take in keeping with the “minimum standards” as defined by the US annual TIP report. International pressure placed on South Africa by the US, the “global sheriff” on human trafficking, is a coercive tool of hegemonic extension. The South African legislation to combat human trafficking, along with restrictions on international travel with a minor child, has had implications on fundamental human rights (Richter et al: 2015).

The emigration/immigration restrictions, aimed at preventing child trafficking, have been cause for debate. In order to exit or enter the country with a minor child, the following needs to be provided: the child’s full length, “unabridged” birth certificate, a signed parental consent affidavit from the parent/guardian that is not accompanying the child which is to be filled out at the Department of Home Affairs, along with a notarized copy of two government issued forms of identification from said parent or guardian (DHA: 2015).

The implications of these new restrictions on human rights need to be addressed. Having had gone through the process, it is long, tedious, and expensive. There are also many ways that women and children can be victimized based on these restrictions. For example, if a woman who is not a South African citizen has a child with a South African, and that child has dual residency, the mother needs to have all the paperwork discussed above in hand in order to exit South Africa with the minor child. South Africa, as stated in chapter two, has problems in relation to gender inequality. It is not always the case that the father of the child will be willing to provide the paperwork necessary for the minor child to leave the country, even in cases where it is in the child’s best interest. This is especially true in cases where abuse has been involved. An abusive

father may not easily allow the mother of his child to leave the country; refusing paperwork to allow the minor child to leave could be used as a method to control an abused woman's movement.

In the case where a parent will not provide permission, a case can be filed at the family courts and a magistrate could override the decision of the parent refusing permission. This is not a path open to a parent who is in South Africa illegally, or to a parent who is financially dependent on the minor child's father. The Department of Home Affairs is no longer accepting permanent residency applications from parents of a South African citizen if the child is less than 18 years of age. Not having permanent residency status makes it difficult for a parent of a South African citizen to find employment.

In cases where a non-South African parent has a spousal visa, getting a work visa attached to the spousal visa is not an easy process. This may lead to further violations of women's rights due to the difficulty of obtaining a work visa if married to a South African citizen. There is also the issue of divorce. If a South African spouse applies for, and is awarded, divorce from a non-South African, the parent without permanent residency or citizenship is in trouble of being declared "undesirable." This puts mothers with minor children in danger of being illegal in the country, unable to lawfully provide for the minor child, and unable to leave with the minor child without the documentation listed above. These regulations may be especially harmful in cases where both mother and child have been subject to abuse.

The new restrictions aimed at preventing child trafficking do not take into account the above mentioned issues. Regardless, South Africa had to pass legislation specific to TIP due to international pressure, specifically from the US. Further, the new restrictions are aimed at



reducing a problem that is not evidence based; “parliamentary requests for data revealed that the Department of Home Affairs could only produce evidence of 23 possible cases of child trafficking between 2012 and 2015” (Richter et al: 2015).

In addition to violations in human rights, gender rights, and the rights of the child, these new restrictions have also impacted economic growth. In order to enter South Africa with a minor child, the above mentioned documentation is required. As South Africa is a tourist destination, and many parents do not have a long form, “unabridged” copy of their child’s birth certificate, they are turned away before they are able to even board a plane (Lombard: 2015).

This has had a negative impact on tourism; as “South Africa’s tourism business index is at its lowest level since 2011” (Tshabalala: 2015). With the current economic state of the nation, these restrictions may have vast, negative economic ramifications for people who depend on tourism for their livelihood. Based on these concerns, the new legislation and accompanying emigration/immigration restrictions should be studied for their effects on human rights violations and on the economy.

Violations of women’s rights, rights of migration, and the best interest of minor children are not of concern in the legislation and accompanying restrictions that govern movement. International laws governing human trafficking fall in the category of criminal justice and organized crime, as opposed to being matter human rights. As discussed, reclassification of human trafficking from an issue of human rights to criminal justice and organized crime can be contributed to international pressure of the United States during the drafting of the current protocol. This has enabled the US to police the world and impose ideology where it sees fit. It was the aim of this report to uncover the role of US hegemony in the South African anti-trafficking in persons

movement. It is my hope that future studies will be conducted to address the impact of South Africa's human trafficking legislation on human rights in the areas of women's studies and migration.

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