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Written Comments to Department of Defense (DoD), General Services Administration (GSA), and National Aeronautics and Space Administration (NASA) Referencing “Public Comments on Protections Against TIP”

The Alliance to End Slavery and Trafficking (ATEST), a national coalition of anti-human trafficking groups, and the undersigned organizations are pleased to submit comments in response to the February 12, 2013 Notice of a public meeting and request for comments pursuant to Executive Order (E.O.) 13627, *Strengthening Protections Against Trafficking In Persons In Federal Contracts*, and Title XVII of the National Defense Authorization Act, Public Law 112-239, the *End Trafficking in Government Contracting Act (ETGCA)*.

ATEST acts with a shared agenda to end forced labor and human trafficking around the world. Member organizations individually reflect a range of perspectives within the anti-human trafficking community both on labor and sexual exploitation, in the United States and around the world. It is this diversity in perspective and expertise that makes the alliance unique and allows members to put forth and advocate for comprehensive solutions that address the needs of the individuals affected by this crime.

It is in this capacity that ATEST

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Independent Verification

Any compliance program and standards of recruitment implemented in response to FAR Council regulations on E.O. 13627 should incorporate a third

1. The ethical framework for cross-border labor recruitment, a joint standard

exploiting the workers' labor and potentially leading to a labor trafficking situation. Over the course of employment, wages paid to the workers should reflect the wages that the employer promised to the worker. One approach to addressing this issue is to develop wage transparency mechanisms that can guarantee that workers are paid the income they are promised, while simultaneously promoting a free market. For instance, a

Defining Subcontractors

Federal contractors and subcontractors looking to avoid the implementation of the E.O. 13627 and ETGCA may construct a contract that limits the liability of subcontractors. We suggest, however, that FAR Council regulations to implement E.O. 13627 should reach contractors, subcontractors, and independent contractors alike who (regard to the term of FAR used in federal contracts. The present language, Tm0.2 (t) 0.20.2 (€) the FAR Council should refine its definition of subcontractor to include any individual providing any such service along the supply chain in the course of executing a federal contract.³ Functionally, this system is simple to enforce because if a person is part of the s,g ofie

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ECPAT-USA

Free the Slaves

International Justice Mission

Not For Sale

Polaris Project

Safe Horizon

Solidarity Center

Verité

Vital Voices Global Partnership

World Vision

Additional Organizations:

American Civil Liberties Union (ACLU)

ATEST is a diverse alliance of U.S.-based human rights organizations, acting with a shared agenda to end all forms of modern-day slavery and human trafficking domestically and globally. ATEST member organizations include: Coalition to Abolish Slavery and Trafficking (CAST), Coalition of Immokalee Workers (CIW), ECPAT-USA, Free the Slaves, International Justice Mission, Not For Sale, Polaris Project, Safe Horizon, Solidarity Center, Verité, Vital Voices Global Partnership, and World Vision.
