

STRENGTHENING RULE OF LAW APPROACHES TO ADDRESS ORGANIZED CRIME:

Private Sector Engagement in Countering Organized Crime

The United States Agency for International Development (USAID) and Management Systems International (MSI) hosted a series of roundtable discussions to better understand key dynamics between the rule of law and organized crime. Held in January 2020, the fifth and final roundtable examined private sector engagement in countering organized crime by promoting crime-free supply chains, crime-sensitive business practices, and alternative livelihoods in crime-affected areas. The roundtable took an expansive look at the forces shaping private sector engagement, including rule-of-law approaches such as legislation and enforcement. The roundtable brought together roughly 40 participants from USAID, the interagency, the private sector, implementing partners, and advocacy organizations. This white paper captures key points from the discussion.

Crime-Free Supply Chains

Approximately 70 percent of today's international trade involves global value chains (OECD 2019), in which increasingly complex configurations of suppliers and manufacturers link raw materials, parts, and laborers from across the globe. Many corporations argue that transnational supply chains improve efficiency and lower the cost of goods and services for consumers; however, they also present challenges, as the sheer number of links in any given chain makes goods difficult to regulate and loopholes easy to exploit. As abuses have come to light, a growing number of consumers, investors, activists, policymakers, and corporations are seeking to ensure

that supply chains are “clean”—that is, free from unethical or illicit activity, such as child/forced labor, human smuggling or trafficking, armed conflict financing, or illicit production or smuggling of goods.

Legislation offers a potentially powerful lever to promote crime-free supply chains. Laws typically proscribe a specific type of criminality—for example, the California Transparency in Supply Chains Act proscribing trafficking in persons; the U.S. Lacey Act proscribing wildlife trafficking; the 2008 amendment of the Lacey Act proscribing trade in illegal timber, forest products, and other plants; and the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act proscribing minerals trafficking. One

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FIGURE I
Supply Chain Roles



roundtable participant referred to the 2008 amendment of the Lacey Act as a game changer in the wood and paper industry as the threat of higher penalties and legal liability “brought the private sector to the table” to take concrete actions and propose innovative technologies for supply chain management.

Another roundtable participant stressed the effectiveness of the 2010 Dodd-Frank Act in reducing minerals trafficking. The act responded to advocacy group claims that the sale of minerals used in popular electronics such as mobile phones was fueling armed conflict in the Democratic Republic of the Congo (DRC). These minerals—principally tantalum, tin, and tungsten (3T), as well as gold—became known as “conflict minerals” as they had generated an estimated \$185 million for armed groups and the Congolese army (Prendergast and Lezhnev 2009). The legislation required publicly traded companies to conduct due diligence by reporting to the U.S. Securities and Exchange Commission and indicating on their websites whether minerals used in their products fueled conflict in the DRC or neighboring countries and whether human rights abuses occurred in processing and trading these minerals. Key to

the legislation’s passage was the Enough Project’s lobbying strategy, which galvanized consumer support and pursued relationships with leading corporations, including Hewlett Packard, Motorola, Intel, Nokia, Microsoft, and Dell (Enough Project 2010).

In the first three years after the Dodd-Frank Act’s passage, the presence of armed groups at 3T mining sites declined from nearly 100 percent of mines to approximately 33 percent (Bafilemba, Mueller, and Lezhnev 2014). The 3Ts also became significantly less profitable for armed groups as minerals not going through conflict-free programs began to sell for 30 to 60 percent less than those that did (*ibid.*). These successes in promoting responsible 3T trade have boosted investor confidence in high-risk environments such as the DRC. However, the gold supply chain has not improved as readily (Seay 2012); as gold is more valuable by weight than the other minerals, it is easy to transport surreptitiously (Prendergast and Lezhnev 2009). Much of the gold mined in the DRC today is smuggled into Rwanda and Uganda and sold as a product of these countries (*ibid.*), highlighting the importance of tailoring regulation based on individual commodities’ qualities and how they are traded.

In addition to legislation, **voluntary standards and certification** can guide companies in establishing ethical and crime-free supply chains (text box 1). Standards can apply broadly to the corporate sector or more narrowly to specific industries, and certification programs can signal that suppliers and subcontractors have met certain standards in their respective industries. For example, in 2011, 16 percent of the world’s coffee, 17 percent of the world’s seafood, and 33 percent of the world’s production forests were certified (Auld

TEXT BOX 1: Voluntary Standards

Many businesses use voluntary standards to guide their actions and signal their commitment to clean supply chains:

- The United Nations Office of the High Commissioner for Human Rights holds guiding principles on business and human rights.
- The Organisation for Economic Co-Operation and Development has guidelines on human rights and employment issues for multinational enterprises.
- The Fair Labor Association maintains fair labor principles on sourcing and production as well as a code of conduct.
- The International Organization for Migration has created the International Recruitment Integrity System standard and voluntary certification schemes on ethical recruitment.
- The Ethical Trading Initiative uses International Labor Organization conventions to prescribe minimum labor standards.
- Financial institutions use the Equator Principles to assess and manage environmental and social risk.
- The Extractives Industry Transparency Initiative requires members to disclose information on tax payments, licenses, contracts, and production.

(Ergon Associations and Ethical Trading Initiative n.d.)

2014). Voluntary certification schemes require robust oversight and buy-in from local workers; without these stipulations in place, documents can be forged easily to circumvent standards (Seay 2012).

Like certification programs, **traceability systems** enable companies to monitor compliance with ethical and legal standards across supply chain nodes. For example, the Seafood Alliance for Legality and Traceability, created through a partnership between USAID and the Walton Family, Packard, and Moore Foundations and implemented by FishWise, promotes legal and sustainable fisheries through catch documentation and traceability systems in seafood supply chains. The systems electronically track how seafood—an industry that generates an estimated \$10–23.5 billion annually in illegal products (FishWise 2017)—moves through supply chains, starting with fishers, who enter data about the seafood they catch, and moving

through the export and processing phases to the retailer. The system also helps advance economic, social, and ecological goals, including improved fisheries management. To promote broad adoption in an industry, traceability systems need to bring together retailers, wholesalers, suppliers, workers, and advocacy groups to build understanding of each group's interests and raise awareness of the system's broader benefits. Adoption by large retailers can incentivize downstream suppliers to comply with standards and thus drive industry formalization.

Monitoring can also play a critical role in measuring the degree to which companies are meeting ethical and legal standards. Monitoring systems can enable parties further down the chain to communicate anonymous information to those higher up or to allow third parties to make independent assessments. In the Supply Unchained Initiative, for example, USAID

partnered with GoodWeave International, Target Corporation, and Skoll Foundation to introduce anonymous worker surveys in the Indian carpet industry that helped verify on-site inspections and identify regions for more regular in-person surveillance. The initiative collected data through mobile phones and used a real-time online dashboard to map and analyze the workers' responses.

Third-party monitoring may be particularly important where workers are unaware of their rights. The Responsible Business Alliance, an industry coalition dedicated to improving corporate social responsibility in global supply chains, has found it challenging to detect human trafficking in supply chains where laborers are accustomed to paying fees to recruitment agencies. Rather than relying on workers' reporting, they have trained third-party auditors to map workers' movements and labor practices—for example, how workers travel from their village to the factory and how they pay for their lodging.

Multistakeholder partnerships are a critical complement to effective implementation of legislation and voluntary schemes. For example, the Public-Private Alliance for Responsible Minerals Trade, formed after the Dodd-Frank Act's passage, brings together industry, government, and nonprofit organizations to encourage due diligence compliance and promote conflict-free minerals from Central Africa.

Multistakeholder partnerships can also help initiate efforts to promote crime-free supply chains. For example, USAID's Regional Development Mission for Asia has partnered with Winrock International and Resonance to enlist companies to counter trafficking in persons (TIP) in their regional

supply chains, especially in agriculture, fishing, domestic work, and construction. These industries rely heavily on migrant labor and are prone to using unethical recruitment practices, such as charging fees from aspiring laborers, confiscating their identity documents, and/or misleading them about contract terms and expected duties. The USAID partnership has sought to enhance knowledge about TIP, help companies increase transparency and traceability in their supply chains, and improve regional coordination on efforts to counter TIP.

Clarifying the business case helps push companies to take action by emphasizing the reputational risk, financial loss, and/or legal liability they take on when they fail to enforce ethical standards in their supply chains, as well as the potential rewards from championing ethical standards for staffing, sales, and financing. Companies also may become more interested in engaging when they are directly involved in conversations about the best methods to establish traceability and transparency, particularly when they can identify viable options.

As one roundtable participant stressed, a critical mass of participants needs to adhere to the crime-free supply system for it to be financially sustainable—comprehensive industry adoption drives sustainability. By facilitating communication and calling attention to an issue, multistakeholder partnerships can help build a new normal.

Working in partnership does not require all parties to have the same interests. Effective partnerships may emerge from different interests that coalesce around similar goals. For example, domestic timber producers in the United States, Australia, and the European Union joined with advocacy groups to stop the importation of illegal

timber (Partzsch and Vlaskamp 2016). The producers took action because the illegally logged imported timber was cheaper than their timber and was negatively impacting their revenue, whereas the advocacy groups sought to protect rainforests from unsustainable harvesting. Another example of this kind of mutually beneficial partnership between differently motivated actors is the use of technology to protect workers on the high seas (text box 2).

Crime-Sensitive Business Practices

USAID and other donors have also engaged businesses to adopt crime-sensitive business practices and avoid unintentionally facilitating organized crime. Engagements have centered on reducing the risks of laundering money and transporting illicit goods.

Like crime-free supply chains, **legislation** provides a clear basis for adopting crime-sensitive business practices. Most countries have passed anti-money laundering legislation, which compels financial institutions to monitor their customers' accounts for suspicious activities (IMOLIN). Most have not passed legislation proscribing the transport of illicit goods, but conservation practitioners, human rights defenders, counternarcotics officials, and other activists have advocated for such legislation, and it exists in some countries for some illicit goods.

The key to making legislation an effective incentive to eliminate criminal practices is to create the right penalties so that a sector improves its internal controls and becomes an asset in the fight against illicit activities. A participant pointed to a recent bank scandal to illustrate this point—after receiving a \$1.9 billion fine and deferred prosecution in 2012 for facilitating the

TEXT BOX 2: Using Technology to Protect Workers on the High Seas

Under USAID's Countering Trafficking in Persons (CTIP) project, Resonance works with Mars Petcare and other companies that source seafood from Thailand to reduce human trafficking in their supply chains. Laborers who catch this seafood are vulnerable to human trafficking as they often spend months at a time on large fishing vessels in dubiously regulated waters. Debt bondage is common, and workers are sometimes transferred against their will from ship to ship (Businesswire 2015).

The project addresses this problem by enhancing connectivity between workers at sea and both human resource systems and workers' families. The project has sought to align the interests of different stakeholders—from the Department of Fisheries and the police to port authorities and vessel owners—with CTIP goals. For example, although vessel owners are reluctant to provide ways for workers to communicate with their families, they are required by Thai law to remain in touch with ship captains through a vessel monitoring system (VMS), which uses satellite signals to locate the waters in which boats are fishing. Although the VMS traces fishing vessels to monitor illegal fishing, it does not ensure the welfare of the fishermen on the boats. The project is testing technology that leverages VMS signals to enable two-way text communication between workers, human resource systems, and workers' families. If one technological solution can ensure both legal compliance for monitoring vessel location and connectivity for laborers, it will provide a promising intersection between the interests of vessel owners and advocates of workers' rights.

laundering of Mexican drug cartel money, HSBC tightened its financial crimes internal controls significantly, as did other global banks seeking to avoid similar fines.

Industry **declarations and task forces** also support the adoption of crime-sensitive business practices. In 2016, the United for Wildlife Buckingham Palace Declaration established commitments for transportation companies to improve due diligence, risk assessment, and other measures to detect illegal wildlife trafficking. Spearheaded by the Duke of Cambridge and the Royal Foundation, United for Wildlife aims to protect wild animals from being hunted to extinction. In addition to ethical concerns, signatories recognized the reputational and legal risks they face by failing to ensure that their cargo is legal, as well as the potential delays associated with inspections and seizures.

Following the declaration, United for Wildlife established a transport task force, with roughly 40 transport companies, and a financial task force, with roughly 30 financial institutions, to identify ways to share resources and intelligence on illicit wildlife trafficking. Two USAID projects, Reducing Opportunities for Unlawful Transport of Endangered Species (ROUTES) and Wildlife Trafficking, Response, Assessment, and Priority Setting (Wildlife TRAPS), have supported signatories to the task forces. The projects have worked with industry associations and individual companies on best practice guidelines, training, assessments, policies, and reporting mechanisms and on recognizing industry champions, such as Delta and United Airlines, in the press. One roundtable participant commented, “The declaration has provided an

avenue to hold companies to their stated commitments and bring them into the fold of partnerships like ROUTES to work on concrete actions.”

Multistakeholder **partnerships** are key to these initiatives' success. They have increased trust, collaboration, and flow of information among diverse stakeholders, including nongovernmental organizations (NGOs), the private sector, governments, and financial institutions. Industry associations, including the International Air Traffic Association, Airports Council International, and International Federation of Freight Forwarders Association, know what assistance will be useful to their members, what incentives can support their efforts, and what kind of language to use for training and awareness efforts. NGOs, including TRAFFIC International, World Wildlife Fund, and the International Union for Conservation of Nature, bring a dedication to wildlife protection and knowledge of the methods and routes used by traffickers. Governments bring financial support for the initiatives and law enforcement capabilities, and transport companies and banks represent the potential interface with traffickers.

Collecting and sharing data on seizures, charges, convictions, and perpetrators support the laws and declarations and can hold companies accountable on commitments they have made to counter criminal activities. As one participant emphasized, “You need data and transparency in order to hold private sector actors accountable and change behavior.” USAID projects have compiled data on wildlife and human trafficking from media reports, generating interactive dashboards that reveal trade

routes and submitting the data to Thomson Reuters/World-Check, Lexus Nexus, and other providers of risk intelligence for financial institutions. One implementing partner, Liberty Shared, also reports information on violations to law enforcement, bank regulators, and a company's bank, enabling regulators to follow up and ask bank officials, "We know you have this information; what are you doing about it?"

NGOs have also worked with the Financial Action Task Force, regional anti-money laundering groups, and the United Nations Office on Drugs and Crime to gather typologies of human trafficking and wildlife trafficking. The typologies are used in training to help financial regulators and banking officials recognize trafficking cases.

Customer demand for crime-sensitive business practices does not influence corporate behavior as it does crime-free supply chains. Participants noted that individuals—not to mention companies—would likely not move their money or loans from an implicated bank given the hassle it would entail. Similarly, customers are not likely to choose flights based on airlines' crime-sensitive business practices but rather on routing and cost factors, even if searches and seizures of illicit products could cause delays.

Alternative Livelihoods

USAID and other donors have also engaged businesses to promote alternative livelihoods. Although individuals' motivations for participating in illicit economies vary, the involvement sometimes reflects a lack of alternatives for making a living. In such cases, efforts to support livelihood opportunities in the licit economy can offset the economic pull of illicit activities.

For this reason, donors and businesses have partnered to support alternative livelihoods and counter illicit crop production, illegal mining, wildlife crimes, illicit timber harvesting, trafficking in persons, and criminal gang activity, among other illicit activities.

Private sector actors can support alternative livelihoods through both their hiring practices and their procurement of licit goods produced in areas affected by organized crime. As employers, private sector actors can support job training efforts by advising on curriculum and providing equipment to training centers; they can also support job placement by offering internships or paid positions to graduates. As buyers, private sector actors can enter purchasing agreements with producers such as cacao growers or legal gold miners. Complementing these efforts, donors or governments can provide life skills training, psychosocial support, job counseling, or other services to job seekers and improved infrastructure, marketing support, technical assistance, and access to credit to local businesses.

Many companies support alternative livelihoods in crime-affected areas because such support can improve social relations and reduce security threats. Companies may otherwise lose resources to extortion or theft, experience attacks on or threats to property and personnel, and consequently spend significant funds on security. They may also have trouble retaining customers and investors due to crime and the perceived role their products may play in financing criminality, corruption, human rights abuses, and conflict. Engaging with local communities and government and supporting alternative livelihoods may mitigate some of these security threats

as community members and supply chain stakeholders see the company as a source of support that merits their protection. In the DRC, for example, the tin mining company Alphamin Bisie Mining SA has invested millions of dollars in the local community, creating jobs, building infrastructure, and supporting dozens of micro-projects, improving the livelihoods and quality of life of most of the surrounding households. When Alphamin initially explored the mine, the company experienced armed attacks on staff and their camp was looted and burned. Since they developed a memorandum of understanding with the host communities in 2015 and have followed through on their commitments, however, they have experienced no serious security incidents (Fahey and Mutumayi 2019).

Support for alternative livelihoods may also provide good publicity for companies—for example, company officials' pictures appearing in local newspapers or [Starbucks](#) publicizing its commitment to buy coffee from growers in coca-producing areas. Depending on the support provided, the investments may also provide companies with well-trained workers or preferred supplies (text box 3).

In some contexts, companies have supported alternative livelihoods in response to legal requirements or political trends. In Peru, for example, the government requires mining companies to invest 3.75 percent of their before-tax income on corporate social responsibility activities (Ayulo 2017), prompting significant investment in alternative livelihoods by mining companies. One roundtable participant suggested that in Colombia, the peace process has energized the private sector to take a more pro-active approach to community development, including support for alternative livelihoods.

TEXT BOX 3: Cacao as an Alternative to Coca Cultivation in Colombia

In 2014, USAID partnered with a Colombian chocolate company, Casa Luker, to create Chocolate Tumaco, a cacao cooperative owned by thousands of local farmers. Casa Luker agreed to purchase 70 percent of Chocolate Tumaco's supply and USAID provided the farmers with technical guidance on agricultural practices and marketing. Tumaco had become a center for illegal coca cultivation (used to produce cocaine), and cacao cultivation provided a legal alternative.

The cooperative has raised the farmers' incomes and given them strength in numbers. When a security issue arose, cooperative members mobilized for their protection. The strong sense of local ownership in Chocolate Tumaco has helped to combat extortion and violence (U.S. Global Development Lab).



Photo credit: USAID

Several lessons have emerged from these efforts. Although providing alternative livelihoods by training and hiring workers may serve companies' interests, there are often barriers to establishing partnerships. In some contexts, relations between potential partners—including business, government, and civil society actors—are distrustful. Even where they are not, reaching out to

companies takes dedicated resources that governments may not have. USAID, NGOs, and other donors have therefore played a key role in **convening** partnerships. One participant commented on their projects' outreach to companies, "It takes a lot of patience and perseverance. We had a 20 percent success rate with our pitches."

Efforts to promote alternative businesses have also benefited from having a convener. In Peru, the USAID-funded Combatting Environmental Crimes project held a one-week workshop with USAID, government, and the private sector representatives and brainstormed ways to offer alternative livelihoods to the 4,000 illegal miners who could not be brought into the formal mining industry. Similarly, the USAID-funded Oro Legal project in Colombia established community councils to discuss alternatives to illegal mining and secure buy-in from all parties. Given the history of conflict in these communities, USAID's role as an outside party was especially important to overcome distrust among illegal miners, mining companies, and local government.

Efforts to promote alternative livelihoods benefit from companies' **broad participation** in an industry. Referring to work with the mining industry in Peru, one participant noted, "It takes a critical mass to shift the industry's relationship to the state and see themselves as part of the system." Geographic concentration may facilitate participation as it enables companies to meet more easily and makes them more likely to face similar issues and have social connections. Additionally, many USAID partnerships have found that working with business associations is an effective and efficient way to reach several companies in

a particular industry segment. Associations can represent the groups' broad interest to donors while expanding messaging and incentives through their memberships.

Efforts also benefit from the broad participation of relevant government ministries and civil society organizations, which offer critical resources, connections, and social capital. In El Salvador, the USAID-funded Bridges for Employment project has worked with a range of partners to help at-risk youth find new or better employment so that they will be less vulnerable to gang recruitment (text box 4).

TEXT BOX 4: Partners of the USAID Bridges for Employment Project in El Salvador

- National Youth Institute
- Ministry of Labor
- Ministry of Education
- National Commission for Micro and Small Enterprise
- National Institute for Professional Training
- Technical and Professional Training Institutions
- Salvadoran Industry Association
- Private sector employers, including Cisco and Microsoft
- Salvadoran Chamber of Information and Communication Technologies

(USAID Bridges to Employment Fact Sheet)

Similarly, the U.S. Department of Labor has engaged workers, local businesses, local governments, NGOs, and communities to support the creation of alternative livelihoods for victims of forced labor.¹ Referencing the Consolidating and Disseminating Efforts to

¹ For more information on the Labor Department's global technical assistance projects, please see their website at <https://www.dol.gov/agencies/ilab/projects>. A recent evaluation of livelihoods services provides more information on this programming: <https://www.dol.gov/sites/dolgov/files/OASP/evaluation/pdf/Livelihoods-Services-Evaluation.pdf>.

Combat Forced Labor project in Brazil, one participant stressed, “We needed to take a community approach, not just focusing on individuals, because the communities are the ones who will have to make and sustain the change.” At the same time, the project needed to foster good communication between local and national stakeholders.

Experience has shown that efforts to establish licit businesses as alternatives to organized crime also need to take a **buyer-led approach**. To be sustainable, businesses need to produce what they can sell, not sell what they can produce (Riordan 2011). Starting with an analysis of market demand, interventions need to work backwards to devise ways for producers to meet buyers’ requirements.

In addition to taking a buyer-led approach, efforts to establish licit businesses as alternatives to organized crime may need to address **context-specific** impediments to success. Approaches to overcoming these impediments will depend on the context and the business in question but may include improving infrastructure to bring goods to market; supporting producer associations to develop economies of scale in purchasing and marketing; providing entrepreneurship training on diversification, innovation, and enrichment of value chains; improving access to credit, including through risk insurance; or securing property titles, if relevant.

In conflict-affected contexts, such efforts may also include the more daunting task of providing security. Violence and the presence of armed groups impede the establishment of lawful businesses. As a report on counternarcotics efforts concluded, “Without a stable security environment, there was little possibility of effectively

curtailing poppy cultivation and drug production in Afghanistan. In areas with improved security and greater economic opportunities, some Afghans were able to diversify their livelihoods away from opium poppy” (SIGAR 2018).

Finally, efforts to promote alternative livelihoods need to explicitly **consider their intended effect on illicit activities** in their design, implementation, and monitoring. A Special Inspector General for Afghanistan Reconstruction report on Afghanistan observed, “Many programs did not incorporate opium poppy cultivation in their baseline studies, needs assessments, or dialogue with communities where the programs were implemented. Consequently, most alternative development projects failed to provide a clear assessment of how program activities contributed to reductions in opium production or mitigated against the risk of encouraging poppy cultivation” (SIGAR 118).

Conclusion

USAID and other donors have considerable experience engaging with the private sector to address various forms of organized crime and improve the environment for both development and business. Donors bring development expertise, local knowledge, networks, credibility, and funds to these efforts, and businesses lend resources, commercial knowledge, and long-term sustainability. **Legal compliance** may offer a potent lever for engagement, but a range of other considerations may prompt voluntary engagement of the private sector—namely, reputational risks, competition from illicit products, operational or security risks, or the desirability of well-trained workers or preferred supplies. **Clarifying the**

business case is more likely to generate high-impact, sustainable engagement than appealing to philanthropic motivations.

Companies have made notable commitments to promote crime-free supply chains, crime-sensitive business practices, and alternative livelihoods in crime-affected areas. **Multistakeholder partnerships**

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- strongly support all these efforts. Involving private sector, government, and nongovernmental stakeholders can drive initiatives forward and integrate diverse interests into common goals. At the same time, **broadening commitments** to include not only isolated companies but industries or regions can build sustainability.
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