



Alternative Report to the United Nations Committee on the Elimination of Discrimination against Women (CEDAW Committee)

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Fundación Buen Pastor - Paraguay

Introduction

1. This alternative report provides complementary information on compliance with article 6 of the Convention, with particular attention to the evolution of human trafficking (HT), its differentiated impact on women, girls and adolescents, and the persistent challenges in prevention, identification, protection, access to justice and reparation for the victims of this scourge in Paraguay.
2. The document was prepared by Fundación Buen Pastor (FBP)¹, the social work of the Congregation of Our Lady of Charity of the Good Shepherd, which holds consultative status with ECOSOC and has a trajectory of human rights advocacy and direct-care experience with girls and adolescents who have gone through situations of HT, sexual exploitation and other serious forms of violence. This experience makes it possible to complement institutional information from the standpoint of trajectories of violation and protection, without seeking to generalize on the basis of individual cases.
3. The analysis relies mainly on official public data and data obtained through requests for access to public information (AIP), regulations and institutional documents, complemented by specialized research. It takes as a reference the concluding observations issued to Paraguay by the CEDAW Committee in 2017² and General Recommendation No. 38 on trafficking in women and girls in the context of global migration³, which requires addressing the structural causes and gender dimensions that create or deepen conditions of vulnerability to HT.

Article 6. Trafficking in women and girls

Institutional progress and recommendations still pending

4. In 2017, the Committee expressed concern about the persistence of trafficking in women and girls in Paraguay, particularly indigenous and rural women and girls, and about existing weaknesses in prevention, identification, protection and assistance. It recommended strengthening the implementation of legislation, identification and referral mechanisms, specialized services and the availability of information⁴.
5. Since then, progress has been made that should be acknowledged, including prosecutorial specialization, the development of investigations and operations through international cooperation, the progressive production of statistical information and, more recently, the effective establishment of the National Program for the Prevention, Combating and Care of Victims of Trafficking in Persons, provided for under Law No. 4788/2012 and currently under the authority of the Ministry of the Interior⁵. Its entry into operation,

¹ <https://buenpastor.org.py/>

² <https://docs.un.org/es/CEDAW/C/PRY/CO/7>

³ <https://www.ohchr.org/es/documents/general-comments-and-recommendations/general-recommendation-no38-2020-trafficking-women>

⁴ CEDAW/C/PRY/CO/7 paragraph 22

⁵ Decree No. 3,362, of February 17, 2025. Available online:

more than a decade after the law's approval, represents a significant advance for the institutional architecture; its main challenge will be translating into effective coordination, prevention and protection capacity, with mechanisms for civil society participation, monitoring and accountability.

Persistence and transformation of the phenomenon

6. The available information shows that HT continues to have a sustained presence. Cases filed with the Public Prosecutor's Office (MP) rose from 67 in 2024 to 99 in 2025, an increase of 48%. This increase should be interpreted with caution, since it may reflect both changes in incidence and improvements in detection and reporting; in any case, it confirms the persistence of significant demand on the investigation, protection and justice systems⁶.

7. The gender dimension remains pronounced. MP records have shown a majority presence of women among HT victims, although the proportions vary depending on the period and statistical universe. The 2025 data also record a significant presence of children and adolescents (NNA) among identified victims⁷. These variations reinforce the need to incorporate disaggregation by sex, age, indigenous status, disability, territory and purpose of exploitation, which would make it possible to identify interrelated forms of vulnerability and prevent historically predominant profiles from rendering other manifestations and populations affected by HT invisible.

8. A particularly relevant finding emerges from the information provided by the MP covering the period 2021 to May 2025: 282 victims were identified, 192 linked to labor exploitation and 90 to sexual exploitation, equivalent to 68.1% and 31.9%, respectively⁸. The predominance of labor exploitation in this universe calls for broadening a response historically associated with sexual exploitation and for strengthening identification capacity in workplaces, hiring chains and intermediation.

9. Age is another critical variable. Of the information processed by the MP, 139 child and adolescent (NNA) victims were recorded: 99 linked to labor exploitation and 40 to sexual exploitation, approximately 71.2% and 28.8%, respectively⁹. The significant presence of NNA calls for specialized responses and adequate identification and protection mechanisms.

10. HT has a significant internal dimension. In its analysis of 392 cases from 2019-2024, the MP identified 181 cases with a national scope and 152 with an international scope, in addition to 12 with both national and international components¹⁰. Transnational cooperation remains indispensable, but these data call into question a representation of HT associated mainly with movement abroad and call for strengthening detection, investigation and protection capacities within Paraguayan territory itself.

Trafficking and criminal markets

11. HT should also not be analyzed in isolation from other criminal markets and activities. In 76 cases examined by the MP, 82 links to other criminal offenses were recorded, including procuring, sexual abuse against NNA, illicit drug trafficking, sexual coercion, kidnapping and money laundering. The existence of these connections does not mean that all HT situations are the work of large criminal organizations: the MP itself has identified cases in which family members, acquaintances or members of the victims' social circle are involved.

12. This complexity requires supplementing investigations focused on individual perpetrators with an analysis of the criminal market: structures, intermediaries, related economic activities, financial flows and

<https://decretos.presidencia.gov.py/#/home>

⁶ <https://www.ministeriopublico.gov.py/nota/aumento-del-48-en-causas-de-trata-de-personas-y-su-impacto-en-las-personas-17836>

⁷ Ibid.

⁸ Public Access to Information. Public Prosecutor's Office

⁹ Ibid, MP

¹⁰ Ibid, MP

profits obtained through exploitation. Asset investigation, the traceability of goods, confiscation and asset recovery should form part of a strategy aimed not only at weakening the economic capacity of those who profit from HT, but also at strengthening the restitution of rights and reparation.

Access to justice and reparation

13. The criminal justice response shows progress, but reparation continues to be a particularly visible gap. Between 2021 and 2025, the information provided by the MP records 19 cases with convictions and 35 convicted persons, while only 4 convictions included compensation for victims¹¹. Differences between recording units make it impossible to calculate a simple reparation rate, but the gap between convicted persons and compensation awards shows that access to justice cannot be assessed solely on the basis of obtaining convictions.

14. The restitution of rights requires sustained assistance and protection, but also effective reparation. In this regard, it is a priority that the National Investment Fund for the Prevention and Care of Victims of Trafficking in Persons, provided for under Law No. 4788/2012, become operational, together with sustainable financing mechanisms linked, in accordance with the applicable legal framework, to asset recovery and to seized and confiscated assets administered by the National Secretariat for the Administration of Seized and Confiscated Assets (SENABICO). This would make it possible to link asset forfeiture, the weakening of criminal markets and reparation for victims.

Indigenous women, girls and adolescents

15. The indigenous peoples' dimension deserves particular attention, in a country with 20 indigenous groups and 5 languages, comprising approximately 130,000 people. In the MP's analysis of 392 cases (2019-2024), 26% of the victims for whom circumstances of vulnerability were identified belonged to indigenous communities¹².

16. Meanwhile, in the period from 2020 to June 2026, the Comprehensive Care Program for Victims of Trafficking and Sexual Exploitation (PAIVTES) of the Ministry of Children and Adolescents (MINNA) recorded 23 indigenous NNA, of whom 16 were girls and female adolescents¹³. The identification of indigenous status is progress, but the available records do not make it possible to systematically determine people, community, language, territory, type of exploitation or the characteristics and outcomes of protection processes. This gap limits the ability to assess whether responses are genuinely accessible, culturally appropriate and linguistically adequate, also in light of the enhanced obligations arising from General Recommendation No. 39¹⁴.

Protection and institutional fragmentation

17. Paraguay currently has specialized capacities distributed among the MP, MINNA, the Ministry of Women (MM), the Ministry of Labor, Employment and Social Security (MTESS), the National Police and other institutions. However, the information gathered shows that records remain not only incomplete but also fragmented. It is not possible to systematically reconstruct a victim's trajectory from detection and referral through protection, investigation, sentencing, reparation and restitution of rights¹⁵.

18. This fragmentation has consequences for prevention. Interoperability should not mean the indiscriminate circulation of sensitive data, but rather the building of secure mechanisms that make it possible to trigger responses when indicators of exploitation appear and to produce anonymized

¹¹ Data provided by the Public Prosecutor's Office through access to public information. Available online:

<https://informacionpublica.paraguay.gov.py/#!/ciudadano/solicitud/104105>

¹² Ibid, MP

¹³ Data provided by the Ministry of Children and Adolescents through access to public information. Available online:

<https://informacionpublica.paraguay.gov.py/#!/ciudadano/solicitud/104099>

¹⁴ <https://www.ohchr.org/es/documents/general-comments-and-recommendations/general-recommendation-no39-2022-rights-indigeneous>

¹⁵ Data provided by the institutions through access to public information. Nos. 104098, 104099, 104102, 104103, 104105

information on trajectories and outcomes. This process must also take into account the growing use of artificial intelligence (AI) in public administration. Although there is no information confirming its specific use in systems linked to HT, its eventual incorporation without clear rules on data protection, human oversight and bias control could reproduce discrimination and disproportionately affect historically vulnerable populations.

Civil society participation and sustainability of specialized services

19. The relationship with civil society is another gap in the current institutional architecture. Between 2015 and 2023, the Rosa Virginia Protection Center (CPRV), run by the Congregation with support from FBP, was the only specialized facility available in the country for comprehensive care and reintegration of girls and adolescent victims of HT and sexual exploitation. Its operation initially received support from MINNA, which at times financed up to 50% of its annual budget. In early 2024, the unilateral withdrawal of state funding led to the closure of the CPRV for one year, interrupting a specialized capacity that had served more than 237 girls and adolescents since it opened. At the time of its closure, the State did not have its own specialized shelter, which was not opened until mid-2024¹⁶.

20. This case reveals a weakness that goes beyond a single service. In a context of insufficient specialized state infrastructure, the withdrawal of support for a capacity developed by civil society reduced the available response, without a planned transition to guarantee the continuity of protection. This experience is particularly relevant given the current exclusion of civil society organizations from institutional spaces for participation in national policy against HT. Strengthening state stewardship should not mean dispensing with the experience accumulated by organizations that take part in the prevention, identification, care and support of victims, but rather establishing transparent and sustainable mechanisms for cooperation and participation, without shifting the State's own obligations onto them.

Disappearances and early detection

21. The phenomenon of missing persons is a matter of concern. Although the data do not make it possible to establish a direct link between missing persons and trafficking in persons, the absence of interoperable data and records also does not make it possible to rule out a connection. Between November 2020 and June 2026, the National Police recorded 13,390 reports of missing persons, of which 6,082 concerned NNA and 101 concerned indigenous persons; at the time of the response, 4,036 cases remained active, meaning cases in which the search remains open and the persons have not been located. The disaggregated data available for 2024 also show that 75.7% of the NNA reported missing were girls and female adolescents. When asked about disappearances with indications of trafficking, sexual or labor exploitation, the National Police responded that it "does not record" those categories, and that the records on disappearances and trafficking operate separately¹⁷. This fragmentation limits the identification of risk factors and the analysis of possible patterns of recruitment and exploitation, which is particularly relevant given the high presence of NNA among registered disappearances.

Conditions and trajectories requiring prevention

22. General Recommendation No. 38 requires that prevention address the structural conditions that traffickers may exploit. In Paraguay, labor informality is a significant factor: in 2025 it reached 60.1% of the non-agricultural employed population and had a differentiated impact on women and young people¹⁸. Informality is not in itself an indicator of HT, but reduced protection, intermediation, temporariness and

¹⁶ For more information, see the statement issued by the Congregation / Fundación Buen Pastor Paraguay in February 2024, available at: <https://www.instagram.com/p/C3QD8D9AGGp/>

¹⁷ Data provided by the National Police through access to public information. Available online: <https://informacionpublica.paraguay.gov.py/#!/ciudadano/solicitud/104098>

¹⁸ <https://www.ine.gov.py/noticias/2891/la-ocupacion-informal-fue-de-601-en-el-ano-2025>

difficulty of oversight can create conditions conducive to various forms of exploitation, particularly given the significant presence of labor exploitation identified in the records.

23. “Criadazgo”¹⁹ poses a similar challenge. Not every situation of criadazgo constitutes HT, but the separation of NNA from their families of origin, dependency on third parties and the performance of unpaid domestic work can create conditions of exploitation. Its persistence also stems from structural factors of poverty and exclusion that cannot be resolved solely through punitive responses. The current inability of the education, health and labor systems to determine how many NNA are in these situations and how they relate to school dropout, child labor or exploitation constitutes a gap in the protection system²⁰.

24. Finally, digital technologies have expanded the spaces in which recruitment processes can begin through social media, messaging, profiles and apparently legitimate offers. Institutional records, however, remain organized mainly around the criminal offense, the victim and the procedural outcome, and do not systematically incorporate variables on means of contact, platform, type of offer or the transition from a digital interaction to a situation of exploitation, whether in-person or online. Prevention requires that the capacity to produce information evolve together with recruitment methods.

Recommendations

26. Fundación Buen Pastor recommends that the Committee urge the Paraguayan State to:

- a) Strengthen and provide sufficient resources to the National Program for the Prevention, Combating and Care of Victims of Trafficking in Persons, establishing effective inter-institutional coordination and articulation mechanisms, civil society participation, and goals and indicators to evaluate its results.
- b) Guarantee specialized, decentralized and sustainable services for HT victims, with culturally and linguistically appropriate accessible responses, particularly for NNA, women, indigenous persons and persons with disabilities.
- c) Guarantee the effective and institutionalized participation of civil society organizations in the formulation, implementation, monitoring and evaluation of anti-trafficking policy, and establish transparent and sustainable cooperation mechanisms for specialized services, avoiding the interruption of protection capacities without previously available alternatives and without shifting the State’s own obligations onto civil society organizations.
- d) Strengthen social protection policies aimed at women, girls and adolescents exposed to conditions that increase the risk of exploitation, through measures for continued education, family strengthening, access to decent employment, and protection against economic precariousness, prioritizing territories and populations with the greatest conditions of vulnerability.
- e) Strengthen the identification of HT for purposes of labor exploitation, including inspection and detection in sectors characterized by informality, intermediation, temporary hiring and worker mobility, without weakening the specialized response to sexual exploitation.
- f) Strengthen prevention with respect to practices such as “criadazgo,” avoiding responses that criminalize situations of poverty.
- g) Develop interoperability mechanisms among detection, protection, investigation and justice records, with strict guarantees of confidentiality and data protection, that make it possible to

¹⁹ In Paraguay, “criadazgo” is a sociocultural practice with roots in the colonial era, whereby children from families living in poverty are handed over to households of a better socioeconomic position, with the promise of shelter, food, clothing and education, in exchange for performing unpaid domestic work or even other kinds of work not appropriate to their age.

²⁰ Data provided by the institutions through access to public information. Nos. 104098, 104099, 104102, 104103, 104105

reconstruct trajectories, identify patterns and produce information useful for strengthening prevention and the institutional response.

- h) Coordinate missing-persons registration and search systems with HT response systems, so that specialized mechanisms can be activated in a timely manner when there are indicators of exploitation, and produce anonymized information on possible connections between the two phenomena.
 - i) Incorporate into records variables that make it possible to identify digital modalities of recruitment and exploitation, and adapt prevention strategies to technological changes, including digital literacy.
 - j) Systematically incorporate the analysis of criminal markets into HT investigations, including structures, intermediaries, economic beneficiaries and financial flows; and strengthen financial and asset investigation, the traceability of goods, confiscation and asset recovery.
 - k) Effectively put into operation the National Investment Fund for the Prevention and Care of Victims of Trafficking in Persons, strengthen compensation and comprehensive reparation mechanisms, and establish mechanisms so that resources from assets seized and confiscated in connection with organized crime contribute to financing the fund.
 - l) Establish clear rules for the eventual use of artificial intelligence in public systems linked to HT, guaranteeing data protection, transparency, human oversight and risk assessment.
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