



EUROJUST

4th meeting of Focus Group of Specialised Prosecutors against Trafficking in Human Beings

Outcome report

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1. Introduction



On 24 and 25 September 2025, the European Union Agency for Criminal Justice Cooperation (Eurojust) hosted the fourth meeting of the [Focus Group of Specialised Prosecutors against Trafficking in Human Beings](#) (THB Focus Group). As in previous years, the meeting was co-organised with the [EU Anti-Trafficking Coordinator](#) (EU ATC).

The fourth meeting of the THB Focus Group brought together practitioners working on cases of trafficking in human beings (THB) from 23 EU Member States and 8 non-EU countries, representatives from the European Commission, Eurojust and the European Union Agency for Law Enforcement Cooperation (Europol), and a number of distinguished speakers representing national authorities, international organisations and non-governmental organisations (NGOs).

The objective of the meeting was to exchange operational experience, discuss emerging trends and challenges and strengthen judicial cooperation in cross-border cases of THB.

More information about the meeting is available in Eurojust's [press release](#), and in updates shared on Eurojust's [X](#) and [LinkedIn](#) channels.

2. Key takeaways

The 2025 meeting of the THB Focus Group highlighted evolving forms of exploitation, persistent challenges in victim identification and the need to further strengthen judicial cooperation across borders.

Holistic and multidisciplinary approach. Effective prosecution of trafficking in human beings requires a horizontal approach involving judicial authorities, law enforcement, financial investigators,

NGOs, international organisations and, where relevant, private-sector actors. Close cooperation across disciplines is essential to identify victims, gather evidence and dismantle organised criminal networks.

Non-EU-country dimension and role of Eurojust. A growing number of cases involve victims, suspects and evidence located outside the EU. Strengthened cooperation with non-EU countries is therefore essential. Eurojust can play a key role in supporting coordination, facilitating judicial cooperation and helping address jurisdictional and evidentiary challenges in such cases.

Victim identification and protection. Victim identification remains a central challenge, particularly in cases involving apparent consent, forced criminality or financial dependency. Victims may not recognise themselves as trafficked or may be reluctant to cooperate. Proactive investigations and a broad evidentiary base are therefore essential. Close cooperation with NGOs and victim support organisations remains crucial to building trust and preventing repeated victimisation.

Application of the non-punishment principle. Differences in national legal frameworks and procedural approaches to the non-punishment principle can complicate cross-border investigations and prosecutions. A shared understanding of core procedural safeguards and their consistent application across jurisdictions is important to ensure effective cooperation and protection of victims involved in criminal activities under coercion.

Emerging forms of exploitation and digitalisation. Under-recognised forms of trafficking, including exploitation linked to forced criminality, benefit fraud and organ removal, require increased awareness and specialised responses. The growing digitalisation of trafficking and the use of emerging technologies, including artificial intelligence (AI), present both challenges and opportunities for investigations.

Value of the THB Focus Group. The THB Focus Group continues to serve as a trusted forum for specialised prosecutors to exchange operational experience, identify emerging trends and strengthen cooperation.

3. Latest developments in THB – EU perspective

Prior to the thematic sessions, representatives from the Office of the EU Anti-Trafficking Coordinator, Europol and Eurojust provided brief updates on recent policy, operational and judicial developments.

3.1. Office of the EU Anti-Trafficking Coordinator

The Office of the EU Anti-Trafficking Coordinator presented recent EU policy and legislative developments. According to Eurostat data for 2023, the overall number of registered victims in the EU had increased, while exploitation for other purposes – particularly forced criminality and benefit fraud – was also on the rise. Sexual and labour exploitation remain the most prevalent forms.

Participants were informed about the adoption of the revised [Anti-Trafficking Directive](#) in 2024, with transposition required by July 2026 and the publication of the [5th progress report on the fight against trafficking in human beings](#). Reference was also made to [ProtectEU](#), the new EU internal security strategy, and to the launch of the [EU Anti-Trafficking Hub](#). The relaunch of the [EU Civil Society Platform against THB](#) was highlighted as an important step in strengthening cooperation with civil society.

The external dimension of the EU's anti-trafficking policy was also emphasised, including cooperation with countries of origin and transit and alignment of legislation through enlargement and partnership processes. The forthcoming EU Anti-Trafficking Strategy will build on these developments and maintain a strong operational focus with continued engagement of practitioners.

3.2. Europol

Europol presented key findings from the 2025 [European Union Serious and Organised Crime Threat Assessment \(SOCTA\)](#), highlighting current operational trends in trafficking in human beings.

- **Adaptability of criminal networks.** THB networks are increasingly flexible, decentralised and resilient. They operate through loose, hybrid structures that make the identification of leadership and dismantling of networks more difficult.
- **Digitalisation of trafficking.** Criminal groups are making extensive use of online platforms, encrypted communications, cryptocurrencies and digital financial tools to recruit victims, advertise exploitation and manage profits. This digital dimension presents both investigative challenges and opportunities.
- **Non-EU-country dimension.** A growing number of investigations involve victims and suspects from non-EU countries. Networks originating from or operating through these countries – including in Latin America, Asia and Africa – remain highly active, requiring strengthened cooperation beyond the EU.

Europol stressed the importance of systematic data-sharing and coordinated cross-border investigations to identify high-value targets and disrupt organised criminal groups.

3.3. Eurojust

Eurojust reported that its [statistics on judicial cooperation in THB cases](#) have stabilised after a period of decline, with the number of cases, coordination meetings and joint investigation teams (JITs) remaining steady.

Operational casework will continue to feed into Eurojust's strategic work, carried out in close cooperation with the THB Focus Group. Recent examples include [analytical work on THB for sexual exploitation and related crimes](#), with further products to be developed based on operational experience and practitioners' input.

The forthcoming EU Anti-Trafficking Strategy and the next European multidisciplinary platform against criminal threats (EMPACT) policy cycle were highlighted as key opportunities to further strengthen judicial cooperation, enhance prosecutorial engagement and ensure that operational and strategic work remain closely aligned.

4. Session I: Trafficking for the purpose of organ removal

This discussion session focused on trafficking for the purpose of organ removal, a form of exploitation for which participating countries reported limited investigative and prosecutorial experience. While indications of such activity exist, few cases have reached prosecution, potentially reflecting the hidden and complex nature of this type of crime.

Participants noted that organised criminal groups exploit the disparity between the demand for and supply of organs, operating across multiple jurisdictions and relying on networks of intermediaries, facilitators and medical contacts. Detection remains difficult due to low reporting rates, patient–doctor confidentiality constraints and challenges in proving the abuse of a position of vulnerability.

Key challenges identified included:

- defining and proving vulnerability in the context of financial incentives or consent;
- overcoming patient–doctor confidentiality barriers and limited information-sharing by the medical profession;
- establishing the trafficking elements required for prosecution; and
- jurisdictional complexities inherent in cross-border cases.

The medical profession often does not provide information to investigators, which further complicates detection and evidence-gathering. Participants highlighted the importance of strengthening cooperation with healthcare professionals and developing clear reporting mechanisms.

The [UNODC toolkit on the investigation and prosecution of trafficking in persons for the purpose of organ removal](#) was presented as a useful resource for practitioners. Participants also discussed the value of robust evaluation systems for living donor transplant. Indicators and red flags for healthcare professionals – including suspicious documentation, inconsistencies in donor–recipient relationships and signs of coercion or vulnerability – were identified as important tools for early detection.

As with other complex forms of organised crime, jurisdictional issues and the need for effective international cooperation were emphasised as central challenges in investigating and prosecuting cases of trafficking for the purpose of organ removal.

5. Workshops

Two parallel workshops allowed participants to exchange practical experience on complex forms of exploitation: the first examined the illusion of consent in trafficking cases, while the second focused on trafficking in human beings for the purpose of benefit fraud and related financial crimes.

5.1. The illusion of consent – when victims do not see themselves as victims

Participants examined cases in which victims did not recognise themselves as trafficked, including situations involving emotional/cultural dependence, grooming or financial incentives.

Key points raised include the following.

- **Consent is legally irrelevant.** Apparent consent cannot legitimise exploitation. Investigations should rely on corroborative evidence such as financial, travel and electronic data rather than solely on victim testimony.
- **Diversified evidentiary approach.** Electronic surveillance, financial records and cooperation with NGOs are increasingly important where victims are unwilling or unable to testify.

- **Victim–perpetrator overlap.** Some cases involve victims who later commit offences under coercion, raising questions on mitigation, sentencing and the application of the non-punishment principle.
- **Legal divergence across jurisdictions.** Differences in national legislation, including the absence of explicit non-punishment provisions in some countries, complicate prosecutions.
- **Cross-border dimension.** Participants stressed the importance of Eurojust coordination, JITs and cooperation with non-EU countries.

5.2. THB for the purpose of benefit fraud and related financial crime

The second workshop addressed cases in which individuals are exploited to obtain social benefits or commit financial offences. Case examples highlighted the difficulty of identifying victims who may not perceive themselves as exploited.

Key points raised include the following.

- **Victim identification challenges.** Many cases begin as financial crime investigations but may reveal indicators of trafficking. Victims are often reluctant to cooperate.
- **Reliance on corroborative evidence.** Electronic evidence, surveillance and cooperation with NGOs were identified as essential tools in building cases without relying solely on victim testimony.
- **Non-punishment and mitigation.** Approaches differ across jurisdictions where victims have committed offences under coercion. Participants noted risks that criminal networks may attempt to exploit legal safeguards.
- **Technology and financial investigations.** Digital forensics and financial tracing are increasingly important to demonstrate coercion and control mechanisms.
- **Emerging phenomenon.** A recent [report by the Council of the Baltic Sea States](#) identifies trafficking for the purpose of benefit fraud as an under-recognised form of exploitation requiring increased awareness and coordinated responses.

6. Session II: Child victims and cross-border investigations

This awareness-raising session was held in a panel format and brought together representatives from an NGO, academia and national prosecution services. Case studies from several jurisdictions illustrated the diversity and complexity of trafficking in human beings involving child victims.

Participants highlighted the hidden nature of child trafficking and the continued difficulty of identifying victims. Both sexual exploitation and exploitation for criminal activities were reported as prevalent. While legislative frameworks are generally robust, securing successful prosecutions remains challenging due to factors such as cultural traditions, lack of victim self-identification and distrust of authorities.

Technology was recognised as both an enabler and a tool. Online platforms, social media and encrypted applications are increasingly used for recruitment and grooming, while digital tools can also support investigations. However, the use of such tools remains uneven across jurisdictions.

Best practices identified included:

- building cases using evidence other than victim testimony;
- the use of video testimony and other protective measures;
- stronger sentencing to enhance deterrence;
- the early involvement of Eurojust in cross-border cases;
- closer cooperation with NGOs and child-protection services.

Participants underlined the need for increased awareness, strengthened victim-centred approaches and enhanced cooperation between judicial authorities, NGOs and relevant private-sector actors, including technology companies, to improve prevention, protection and prosecution in cases involving child victims.

7. Session III: Artificial intelligence and technology

Participants discussed the growing impact of AI on THB and on criminal justice responses more broadly. Reference was made to Eurojust's 10th [Cybercrime Judicial Monitor](#), which highlights the increasing relevance of AI in the criminal justice sector and its dual role as both an enabler of crime and a potential investigative tool.

Most jurisdictions currently rely on existing criminal legislation to address AI-enabled crime, as specific legal frameworks remain limited. The forthcoming EU AI Act, expected to apply from 2026, will provide a regulatory basis, but many practical aspects remain under development at both EU and national levels. The liability of developers, providers and users of AI systems used for criminal purposes continues to vary across jurisdictions.

The integration of AI into investigations and prosecutions remains at an early stage. Some authorities are already using AI tools to support investigative work, including transcription, translation and analysis of large datasets. The admissibility of AI-generated evidence is assessed under existing evidentiary rules, with particular attention given to transparency, human oversight and potential bias.

Participants noted that criminal networks are increasingly exploiting AI tools, including for online recruitment, deception and the creation of fake content. Emerging risks include the use of deepfakes and voice cloning, and the potential for AI to scale exploitation and enhance anonymity. At the same time, AI offers opportunities for law enforcement and judicial authorities, including improved detection of manipulated content and enhanced analysis of digital and financial data.

8. Session IV: Strengthening the judicial role in EMPACT THB

The discussion highlighted the importance of reinforcing the judicial dimension within EMPACT THB in the forthcoming policy cycle. Strengthening the involvement of prosecutors in operational and strategic activities was emphasised as key to ensuring that EMPACT actions translate into effective investigations, prosecutions and asset recovery.

Reference was made to ongoing EMPACT initiatives, including operational activities addressing online-enabled exploitation and innovation-driven formats, such as the [EMPACT THB Hackathon](#), which bring

together multidisciplinary teams to identify emerging trends and support coordinated responses. These initiatives demonstrate the added value of closer cooperation between law enforcement and judicial authorities.

The [new EMPACT policy cycle](#) and the forthcoming EU Anti-Trafficking Strategy provide an opportunity to further embed judicial engagement in EMPACT THB, enhance coordination and ensure that operational and strategic work remain closely aligned.

9. Conclusions

The fourth meeting of the THB Focus Group confirmed the continued importance of close judicial cooperation in addressing trafficking in human beings in an evolving criminal landscape.

The discussions highlighted the increasing complexity of cases, including new forms of exploitation, the digitalisation of criminal activity and the involvement of organised criminal groups operating across multiple jurisdictions.

The THB Focus Group remains a key forum for exchange among specialised prosecutors, supporting trust-building, operational cooperation and the development of coordinated responses to trafficking in human beings.



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