



Contemporary Slavery in Brazil:

Input to the United Nations Special Rapporteur on Contemporary Forms of Slavery

Type of Stakeholder: Academic institution.

Respondent: Professors Lívia Mendes Moreira Miraglia and Carlos Henrique Borlido Haddad^{1*}, Shevah Ahavat Esberard, Maria Paula de Macêdo Costa Rabello, Maria Cecília Carvalho de Castro, Larissa Diniz Domingos, Clara Kutova, Angelina Reis de Mattos, Vitória Simões de Magalhães on behalf of the UFMG² Law School's [Slave Labor and Human Trafficking Clinic](#).

Can we attribute responses to this questionnaire publicly? Yes.

Introduction

This report is submitted by the UFMG Slave Labor and Human Trafficking Clinic in response to the call for contributions by the United Nations Special Rapporteur on contemporary forms of slavery, ahead of the 60th session of the Human Rights Council³. It is grounded in legal research, empirical data collection, and extensive case documentation developed within the Clinic's activities in Brazil. The focus on Brazil is not merely national in scope; rather, it illuminates the structural mechanisms through which contemporary slavery persists even in democratic states with formal protections for labor rights.

The Brazilian case is emblematic of the complex interplay between historical continuities of colonial exploitation and modern capitalist production, where racial, regional, gendered, and class-based inequalities converge to reproduce slave-like situations. Despite the existence of a robust legal framework, with Article 149 of the Penal Code being a notable example, and having internationally acclaimed enforcements mechanisms such as the Dirty List, the Conduct Adjustment Agreement (TAC), and Labor Class Actions (ACP), contemporary slavery remains deeply rooted and often obscured by informal labor relations and by the invisibility of the private households when concerning domestic servitude.

Slavery has been a structural component of Brazilian history since the early 16th century. Initially imposed on Indigenous peoples, the system expanded rapidly with the arrival of enslaved Africans, the first ship arriving in Salvador (Bahia) in 1535. Over the course of more than three centuries, approximately four million

^{1**} Directors [Slave Labor and Human Trafficking Clinic](#), at the Law Faculty of the Federal University of Minas Gerais.

² Universidade Federal de Minas Gerais (Federal University of Minas Gerais).

³ United Nations. [Call for input of the Special Rapporteur on contemporary forms of slavery. Tomoya Obokata, to inform country visit to Brazil \(18-29 August 2025\)](#). *UN OHCHR Calls for Input*, 2025.



Africans were forcibly brought to Brazil, making it the country with the largest number of enslaved Africans in the Americas. The formal abolition of slavery in Brazil occurred in 1888 with the enactment of the Lei Áurea, making Brazil the last country in the Western world to legally abolish slavery. Nevertheless, the structures that enabled slavery were neither dismantled nor adequately addressed in the decades that followed. On the contrary, contemporary Brazil continues to reproduce systems of exploitation that mirror the colonial past, particularly through persistent racial, social, and economic inequalities.

Contemporary slave labor, officially recognized by the Brazilian government in 1995 before the International Labour Organization (OIT), is legally defined by article 149 of the Brazilian Penal Code. This provision characterizes slavery-like conditions through the presence of one or more of the following elements: forced labor, exhausting work hours, debt bondage, or degrading working conditions. It is not necessary for all four criteria to be met; the presence of just one suffices to constitute a violation. From 1995 to 2021, over 57,000 workers were rescued from such conditions in Brazil.

This submission analyzes the legal, institutional, and social dimensions of contemporary slavery in Brazil by focusing on five key aspects, selected for their relevance to both diagnosis and intervention. It begins with a detailed discussion of the legal concept of slavery-like conditions in Brazil, emphasizing the expansion of the definition to include degrading conditions, exhausting work hours, and debt bondage. Those forms of coercion, that often do not rely on physical violence but on structural vulnerability, are key concepts given the dimension of social inequality in Brazil. The report then examines institutional mechanisms such as the Dirty List, TACs, and ACPs have functioned in practice, with a particular focus on the state of Minas Gerais (MG). The state has rescued the most enslaved workers since 2013, so looking at the data from MG is the best way to understand what is happening with enslaved workers in Brazil.

The Slave Labour and Human Trafficking Clinic at the UFMG Law School conducted two in-depth studies on the reality of slave labour in Minas Gerais, based on an analysis of all violation reports prepared by the Ministry of Labour and Employment between 2003 and 2023. The studies — ‘Slave labour: between inspection findings and judicial responses’ and ‘From infringement notices to public civil action: a portrait of slave labour in Minas Gerais’ — provide a detailed overview of the dynamics of the phenomenon in the state, highlighting the links between administrative action and subsequent judicial measures.

Further, the report provides a demographic and socio-economic profile of the rescued workers, exposing how contemporary slavery disproportionately affects black and brown people from rural and impoverished regions, especially young men with limited education and difficulty to access formal employment. In the case of domestic slavery, the report draws on original national research coordinated by the



Clinic, "What Do Brazil's Big Houses Hide in the 21st Century?", to explore the gendered and racialized dynamics that sustain a largely invisible form of slavery, one that operates under the guise of familial bonds and emotional indebtedness, often shielded by the legal inviolability of the home.

Finally, the report turns to the persistent challenges of criminal accountability. Despite clear documentation of slave-like conditions and repeated inspections confirming labor crimes, few cases result in criminal convictions, and most are either dismissed, indefinitely delayed, or resolved through minor penalties. The disconnection between administrative findings and judicial outcomes reveals a system marked by impunity and a justice apparatus that fails to respond adequately to the gravity of these violations.

The analyses will be grounded in data obtained by research conducted by the Clinic "Slave labour in the scales of justice", which analysed 432 public civil actions and 1,494 criminal actions related to the issue, filed between 2008 and 2019 in all states of Brazil. The present study examines the manner in which the Labour Courts and the Criminal Courts comprehend and adjudicate cases pertaining to slave labour in Brazil. This research is currently being updated to incorporate more recent data and provide an even more accurate picture of the justice system's efforts to combat slave labour.

By integrating legal analysis with empirical research and case-based evidence, this report aims to contribute to international human rights monitoring while underscoring the urgent need for structural transformation. The persistence of contemporary slavery in Brazil is not a matter of legal deficiency alone—it is a social, political, and institutional failure that reflects how historical forms of domination have been adapted, rather than abolished.

This report will be developed specially on the basis of the materials produced by the Clinic, which will be duly attached to ensure methodological transparency and technical depth in the analyses presented.

The UFMG Slave Labor and Human Trafficking Clinic

The [UFMG Slave Labor and Human Trafficking Clinic](#) is a project from the Federal University of Minas Gerais's School of Law. The Clinic is part of Clinnect HTS, an international network of clinics which are dedicated to the study of, and the struggle against, human trafficking and slave labor. The Clinic's activities encompass, among others:

- i) the training of students in both the theory and practice of slavery and human trafficking, with the development of interview techniques, the



- draft of legal petitions, the study and discussion of concrete cases, among others;
- ii) a permanent work of legal aid and assistance to persons affected by human trafficking and contemporary forms of slavery;
 - iii) the promotion of classes, courses, conferences and seminars; and
 - iv) the communication of results through technical and academic publications, social media and other means.

The UFMG Slavery and Human Trafficking Clinic has conducted several studies on modern slavery and human trafficking in Brazil, becoming an essential source of data and information. Its findings have been cited in submissions by the Prosecutor General of the Republic in landmark cases on these issues before the Federal Supreme Court (STF). Additionally, the Clinic has participated as *amicus curiae* in four cases related to contemporary human trafficking and forced labor before the Supreme Court. In recent years, its work has been nationally recognized through three awards granted by the National Justice Council (CNJ) and the National Association of Labor Judges (Anamatra).

Moreover, the Clinic has played a key role in over 90 individual legal actions advocating for victims of slave labor and human trafficking. Through its awareness and citizenship project, it has reached more than 8,000 students in public and private schools. The Clinic has also contributed to public policy development, culminating in the drafting of a bill presented to the Legislative Assembly of the State of Minas Gerais, specifically addressing the protection of domestic slave labor victims.

Abbreviations

ACP	Ação Civil Pública / Public Civil Actions
ANAMT	Associação Nacional de Medicina do Trabalho
Cebrap	Centro Brasileiro de Análise e Planejamento
CLT	Consolidação das Leis do Trabalho / Consolidation of Labor Laws
CNJ	Conselho Nacional de Justiça / National Council of Justice
CNTE	Confederação Nacional dos Trabalhadores em Educação / National Confederation of Education Workers
CNV	Comissão Nacional da Verdade / National Truth Commission



COETRAE(s)	State Commissions for the Eradication of Slave Labor
CONATRAE	Comissão Nacional para a Erradicação do Trabalho Escravo / National Commission for the Eradication of Slave Work
CPT	Comissão Pastoral da Terra / Pastoral Land Commission
CRAS	Centro de Referência de Assistência Social / Social Assistance Reference Center
CREAS	Centro de Referência Especializado de Assistência Social / Specialized Social Assistance Center
CSO(s)	Civil society organization(s)
CTPS	Carteira de Trabalho e Previdência Social
CUT	Central Única dos Trabalhadores
FAT	Fundo de Amparo ao Trabalhador / Worker Support Fund
FGTS	Fundo de Garantia do Tempo de Serviço
GEFM	Grupo Especial de Fiscalização Móvel / Special Mobile Inspection Group
IBGE	Instituto Brasileiro de Geografia e Estatística / Brazilian Institute of Geography and Statistics
ILO	International Labor Organization
InPACTO	Instituto Pacto Nacional pela Erradicação do Trabalho Escravo / National Pact Institute for the Eradication of Slave Labor
IVI	InPACTO Vulnerability Index
MDHC	Ministério dos Direitos Humanos e da Cidadania / Ministry of Human Rights and Citizenship
MDS	Ministério do Desenvolvimento e Assistência Social, Família e Combate à Fome / Ministry of Development and Social Assistance, Family and Fight Against Hunger
MPF	Ministério Público Federal / Federal Public Prosecutor's Office
MPT	Ministério Público do Trabalho / Public Prosecutor's Office for Labor
MTE	Ministério do Trabalho e Emprego / Ministry of Labor and Employment



NGO(s)	Non-governmental organization(s)
OHCHR	Office of the High Commissioner for Human Rights
OIT	Organização Internacional do Trabalho (Portuguese for ILO)
PF	Polícia Federal / Federal Police
PNAD	Pesquisa Nacional por Amostra de Domicílios Contínua / Continuous National Household Sample Survey
PPE	Personal protective equipment
PRF	Polícia Rodoviária Federal / Federal Highway Police
Sinait	Sindicato Nacional dos Auditores Fiscais do Trabalho / National Union of Labor Inspectors
SIT	Secretaria de Inspeção do Trabalho / Department/Secretariat of Labor Inspection
SUAS	Sistema Único de Assistência Social / Unified Social Assistance System
TAC	Termo de Ajustamento de Conduta / Conduct Adjustment Term
TIP	Lista de Piores Formas de Trabalho Infantil / List of Worst Forms of Child Labor
U.S.	United States
USDOL	United States Department of Labor
UFMG	Universidade Federal de Minas Gerais
UN	United Nations

Suggested citation:

Miraglia, Livia Mendes Moreira; HADDAD, Carlos Henrique Borlido; et al. UFMG Slave Labor and Human Trafficking Clinic, May 2025.



Executive Summary

- **An Overview of Contemporary Slavery in Brazil**

The legal concept of slave labor in Brazil, defined under Article 149 of the Penal Code, includes forced labor, degrading conditions, exhausting work hours, and debt bondage. Each of these practices reflects structural coercion, often without physical force. The definition recognizes that poverty, social isolation, and lack of alternatives play decisive roles in subjugating workers. This section outlines how these legal categories manifest in practice and emphasizes the need for a rights-based interpretation aligned with international human rights law.

- **General Data on Contemporary Slavery in Brazil**

Brazil's most affected sectors include cattle farming, coffee cultivation, domestic work, and construction. Cattle farming accounts for the largest number of rescues historically, while coffee cultivation led the rankings in the past five years. A troubling increase in construction-related rescues was recorded in 2024. Geographically, Pará leads historically, while Minas Gerais registered the most rescues since 2013.

The municipalities of Confresa (MT), Camaçari (BA), and São Paulo (SP) had particularly high numbers of rescues. This data highlights the connection between economic activity, regional inequality, and labor exploitation.

- **Overview of the Brazilian State of Minas Gerais**

The state of Minas Gerais stands out both for the severity of the problem of contemporary slavery and for the strength of its institutional response. Between 2017 and 2023, 4,357 workers were rescued in the state, making it the Brazilian federation unit with the highest number of rescues in the past five years. This high number does not necessarily indicate greater prevalence, but rather a higher degree of inspection effectiveness and inter-institutional coordination, particularly



between the Ministry of Labor and Employment (MTE) and the Labor Prosecution Office (MPT). The operations are concentrated especially in the northern region of the state, where social vulnerability indicators are worse and the Human Development Index is significantly lower.

The demographic profile of the rescued workers in Minas Gerais mirrors national patterns: 84% self-identified as black or brown, 92% were men, 48% were born in the Northeast region—particularly Maranhão—and most had incomplete basic education or were illiterate. These characteristics expose the dimensions of structural racism and vulnerability. Among the rescued, many lacked identification documents or formal employment histories, indicating long-term exclusion from social protection systems. The majority were subjected to degrading and exhausting work conditions in rural economic activities such as coffee cultivation, charcoal production, and cattle farming.

● **Overview of Domestic Contemporary Slavery in Brazil**

Domestic slavery affects mostly older black or brown women. Often justified through the rhetoric of care, kinship, or gratitude, these labor relationships mask decades of unpaid work, social isolation, and the denial of basic rights. The Clinic's national study revealed 92 confirmed victims, 79% of whom were women, most of them over 60, illiterate, and having endured more than two decades of exploitation. Employers frequently withheld state benefits, documents, and contact with families. The research also found a gendered profile of perpetrators, 70% of whom were women, reflecting the reproduction of patriarchal and racial labor hierarchies. Despite strong administrative evidence, criminal convictions remain virtually nonexistent.

An overview of contemporary slavery in Brazil



The following section aims to analyze the phenomenon of contemporary slavery in Brazil, highlighting the main legal and institutional instruments used to combat it. To this end, it will address the Term of Adjustment of Conduct (TAC), the Public Civil Action (ACP), and the so-called “Dirty List,” explaining their foundations, purposes, and how they contribute to holding offenders accountable and protecting the labor and human rights of workers subjected to conditions analogous to slavery.

Slave labor legal definition

The fundamental legal concept of slave labor is established in Article 149 of the Brazilian Penal Code. With Law No. 10.803/03, this criminal provision was amended, as it was previously presented in a more concise manner. According to this article, reducing someone to a condition analogous to slavery occurs when the worker is subjected to: (i) forced labor; (ii) exhausting work hours; (iii) degrading working conditions; (iv) or restriction, by any means, of the worker's movement due to debt contracted with the employer or their representative.

Forced labor is any work or service demanded from an individual under the threat of any penalty and for which the person has not offered themselves voluntarily. This definition stems from International Labour Organization (ILO) Conventions, such as Conventions No. 29 and 105, and is aligned with Normative Instruction No. 2 from the Ministry of Labor and Employment (MTE), which defines it as “work demanded under the threat of physical or psychological sanctions and for which the worker has not volunteered or does not wish to remain in voluntarily”.

It is important to highlight that, in Brazil, due to poverty and extreme need, physical coercion is often unnecessary to keep workers in slavery-like conditions.

Exhausting work hours refers to “any form of physical or mental labor that, due to its length or intensity, violates the worker’s fundamental rights, especially those related to safety, health, rest, family and social life”. Practices such as frequent overtime, unattainable targets, absence of rest days, pressure for high delivery



volumes, and piece-rate pay that compels workers to endure overload and extreme physical strain are examples of exhausting work conditions. This violation of working hour limits impairs personal fulfillment and social interaction, and may lead to compensation for existential damages, which may be presumed (*in re ipsa*).

Degrading working conditions are those that show disregard for human dignity by violating the worker's fundamental rights, especially those related to hygiene, health, safety, housing, rest, food, or other personality rights, due to a condition of subjection where the workers will become irrelevant.

Regional Labor Court (TRT-8) Precedent No. 36 defines degrading work as that performed under wholly inadequate conditions, without adherence to any occupational safety, health, or hygiene standards. MTE Normative Instruction No. 02/21 specifies that it includes "any denial of human dignity through the violation of the worker's fundamental rights, especially those found in labor protection, safety, and health regulations". Indicators of degrading conditions include lack of adequate housing, poor hygiene and safety at the workplace, and exposure to serious and imminent risks.

A study conducted by the Clinic revealed the presence of a 'tripod of degradation' in a significant proportion of cases involving substandard living conditions, akin to those associated with slavery. These conditions encompass inadequate sanitation, unsatisfactory housing, and the absence of potable water.

Debt bondage, according to the 1956 Supplementary Convention on the Abolition of Slavery (ratified by Brazil), is a condition in which a debtor pledges their personal services as security for a debt if the value of those services is not fairly assessed or the duration and nature of the work are not limited or defined. This form commonly involves the fabrication of illegal debts (including costs for transport, food, housing, tools), creating a debt cycle that traps the worker.



The restriction of movement due to debt, as described in MTE Normative Instruction No. 02/21, refers to “limiting the fundamental right to come and go or to terminate the labor relationship due to a debt imposed by the employer/representative or through induced indebtedness to third parties”. Indicators of such restriction include employer-paid transportation costs deducted from wages, previous debts paid by the employer and later deducted from salary, supply of goods/services at abusive prices, or unlawful deductions.

In addition to these four main categories, MTE Normative Instruction No. 02/21 also lists other means of restricting movement, such as preventing access to transportation, strict surveillance at the work site, and confiscation of personal documents or belongings.

In summary, the concept of contemporary slave labor in Brazil encompasses not only direct restrictions on freedom but also the subjection of workers to inhumane and exploitative labor conditions, characterized by forced labor, exhausting work hours, degrading conditions, and debt bondage, as defined in Article 149 of the Penal Code and further detailed by various regulations and legal interpretations. The goal of legislation and legal action is to ensure the constitutional right of access to justice for victims, offering them broad and high-quality legal assistance.

The Register of Employers who have subjected workers to conditions analogous to slavery (Dirty List)⁴

⁴ This part was originally published in: MIRAGLIA, L. M. M.; FAGUNDES, M. K. . The hidden face of slave labor dirty list. REVISTA DIREITO DAS RELAÇÕES SOCIAIS E TRABALHISTAS, v. 10, p. 16-34, 2024.



The Register of Employers subjecting workers to conditions analogous to slavery was first established on 17th November 2003 and is more commonly known as the "Dirty List". The institution was originally established by the Ministry of Labor Ordinance No. 1.234/03 as part of the general and specific objectives set out in the "National Plan for the Eradication of Slave Labor", which was launched at the beginning of 2003.

It is regarded as a praiseworthy exemplar by the United Nations (UN) and is unquestionably one of the primary instruments for combating slave labour in Brazil. In the event that an employer is found to be subjecting workers to conditions analogous to slavery, their name will be included in a public register, which is updated on a semi-annual basis following a final administrative decision confirming the labour inspection's infraction notice.

Once included in the Dirty List, the employer is prohibited from obtaining or maintaining public funding for their economic activities, as established in Ordinance No. 1.150 of November 18, 2003. This restriction is justified by the ordinance itself, which highlights the need for tax incentives for regional development to foster fair and decent work, and underscores the social function of rural property through rational use and sustainable development.

The initial version of the list was released to the public by Repórter Brasil in November 2003, utilising information procured by Agência Brasil. It was only in 2004, through Ministry of Labor Ordinance No. 540 of October 15, that the term "Register of Employers Who Have Maintained Workers in Conditions Analogous to Slavery" was formally adopted.

In December 2014, publication of the register was suspended by the Federal Supreme Court (STF) through a preliminary injunction issued by Justice Ricardo Lewandowski in the context of Direct Action of Unconstitutionality (ADI) No. 5209. The reasoning behind the injunction was the need for "the prior existence of a formal



law capable of establishing limits for the exercise of regulatory power” (Art. 87, II, of the 1988 Constitution). It was only in May 2016, based on newly issued Interministerial Ordinance MTPS/MMIRDH No. 4—a joint act of the then Ministry of Labor and Social Security and the Ministry of Women, Racial Equality, Youth, and Human Rights—that Justice Cármen Lúcia overturned the injunction, resulting in the dismissal of ADI No. 5209.

Two years later, in May 2018, ABRAINCO filed ADPF No. 509, again questioning the constitutionality of the Dirty List. It argued that the 2016 Ordinance violated the principle of legal reserve, as the creation of a restrictive registry of rights could only be done by law. Justice Cármen Lúcia denied the preliminary injunction, and the STF plenary ruled on the merits on September 16, 2020.

Justice Marco Aurélio ruled that the ordinance did not violate the legal reserve principle and gave effect to the Access to Information Law, whose core principle of “active transparency” requires public bodies to disclose public interest information without being requested. He also argued that the register is not punitive in nature and that the ordinance fulfills fundamental rights related to human dignity, including the prohibition of human commodification and the social value of labor. His position prevailed, and since then, there has been no doubt about the Dirty List’s constitutionality.

As previously mentioned, the Dirty List is subject to review and publication on a semi-annual basis. Employers are obligated to ensure that their conduct is in accordance with Brazilian legislation in order to avoid the reinclusion of the aforementioned fees. In the event of an agreement being reached with the federal government, or of a lawsuit being filed (with or without an injunction request), the individual concerned may request suspension or removal from the register. Alternatively, if three conditions are met, this may also happen: certification of non-recurrence, payment of fines related to inspection infractions, and proof of



settlement of labour and social security debts. The ordinance stipulates that employers are listed for a maximum period of two years.

The disclosure of the names of individuals or companies that subject people to conditions analogous to slavery is a matter of public interest. This is not only because such practices constitute a crime under Article 149 of the Penal Code, but also because such practices are intolerable in the 21st century. The contemporary institution of forced labour represents a grave infringement on human rights, constituting an affront to both human dignity and the fundamental principles of democratic governance.

The inclusion of employer names in the register constitutes the logical outcome of the inspection process when an infraction notice confirms the existence of slave-like labour conditions. Inclusion in the Register is a mandatory and automatic act, based solely on a final and unappealable administrative decision upholding the infraction, respecting due process and the right to defence.

As with any administrative act, the inclusion of an employer on the list is subject to judicial review and may be reversed, resulting in removal from the register.

Out of the 427 names included in the list between March 2017 and April 2022, 106 employers were appended and subsequently expunged from the Dirty List. Of this total, two failed to adhere to Brazilian legal standards and were re-added to the register within a period of less than four years. This was the case with companies in Minas Gerais. Despite being listed in 2018, the continuation of the illegal practice led to their reinclusion in 2019 and 2022, respectively.

Undoubtedly, the Dirty List has been demonstrated to play a pivotal role in the prevention of exploitation through the restriction of access to public credit. Additionally, its implications extend to the realm of social control, exerting a direct influence on an employer's reputation. The broad disclosure of names is imperative



to promote ethical consumption and increase social pressure for the eradication of the practice. In today's world, no serious national or international business wants to be associated with companies that use slave labor in their supply chains.

The most recent list, published on April 9, 2025, included 155 employers, thus totalling 745 names. Of these, 18 were added due to proven cases of forced labour in domestic work. The sectors with the highest number of inclusions in this edition were as follows: cattle farming (21); coffee cultivation (20); domestic work (18); charcoal production (10); and various mineral extraction activities (7).

Conduct Adjustment Agreement (TAC)

The Conduct Adjustment Agreement (TAC), provided for in Article 5, §6 of the Public Civil Action Law (Law No. 7.347/85), aims to protect diffuse, collective, and homogeneous individual rights by taking "from the interested parties a commitment to adjust their conduct to legal requirements, under penalties, which shall have the effectiveness of an extrajudicial enforceable title."



Within the scope of the Labor Prosecution Office (MPT), Labor Prosecutors may, at any time, propose that those under investigation sign a TAC to administratively resolve irregularities identified during the investigation, by imposing obligations to give, to do, or to refrain from certain acts.

The use of TACs by the MPT generally precedes or serves as an alternative to filing a Public Civil Action (ACP). The TAC is often the preferred route for extrajudicial resolution of labor violations, while the ACP is used when an agreement cannot be reached. However, data from Minas Gerais reveals cases where both a TAC and an ACP coexisted, indicating exceptional circumstances such as noncompliance with a previously signed TAC, which after being archived, led to the need for filing an ACP, or the continuation of the illegal practice even after the agreement.

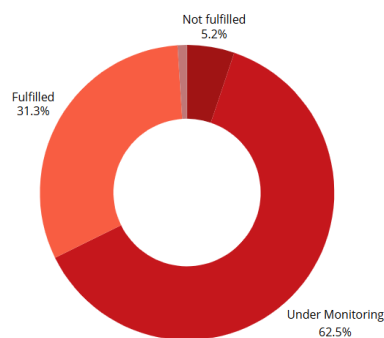
The negotiation and formalization of a TAC can occur swiftly, including *in loco* during the inspection itself, especially when a member of the MPT is present in the operation. This presence ensures greater speed and effectiveness, allowing the employer to immediately adjust their conduct and workers to quickly have their rights guaranteed. The terms of the agreement generally reflect the conditions and irregularities identified in the labor inspection reports prepared by labor inspectors.

Between 2017 and 2022, the study in Minas Gerais identified 105 TACs signed as a result of complaints of work analogous to slavery or related inspections. Of these, 87 (82.85%) were linked to reports that concluded the existence of conditions analogous to slavery. The most affected sectors were agriculture (37 cases) and charcoal production (33 cases). The most common obligations included in TACs were the provision of Personal Protective Equipment (PPE), payment of wages, and compensation for moral damages.

The analysis of the effectiveness of the 87 TACs signed in slavery-like work cases during the period of 2017 and 2023 in Minas Gerais, shows that most tended



to be complied with. Specifically, 29 were fulfilled, 52 were under monitoring at the time of the research, 1 was partially fulfilled, 4 were not fulfilled, and 1 had its object lost. The significant number of TACs under “monitoring” (59.77%) is likely due to the nature of obligations to do or refrain from certain acts, which are often ongoing or long-term, requiring continuous oversight by the MPT. Compared to the previous period (2004–2017), the percentage of noncompliance decreased.



The nature of the TAC as an extrajudicial enforceable title is crucial to its coercive power. In case of noncompliance with the agreed terms, the MPT is legally empowered to file an enforcement action before the Labor Court, aiming to compel the employer (defendant) to fulfill the outstanding obligations and pay the fines previously stipulated in the TAC for noncompliance. During the period analyzed (2017–2022), three enforcement actions of TACs were found to have stemmed from inspection reports that confirmed the existence of slave labor. Practical difficulties in the enforcement phase—such as locating the employer's assets—were noted in some cases.

A relevant and evolving practice of the MPT in Minas Gerais is the inclusion of compensation for both collective and individual moral damages in TACs. The research identified a significant increase in the provision of individual moral damages from 2019 onward, with all 10 TACs signed in 2022 involving slave labor cases including such compensation. The amounts for individual moral damages



varied widely, ranging from R\$1,250.00 to R\$1,228,500.00, depending on the case and the duration of the worker's employment.

Regarding collective moral damages, a notable increase in the amounts was also observed from 2019, although the most common figure was R\$10,000.00. The highest value for collective moral damages in a TAC during the period was R\$500,000.00. The inclusion of these obligations reflects a more proactive stance by the MPT in seeking full reparation for the harm caused by labor exploitation, going beyond obligations merely related to working conditions.

There is also a noteworthy connection between TACs and the Dirty List (Register of Employers who have subjected workers to conditions analogous to slavery). Of the 87 TACs signed in slave labor cases between 2017 and 2022 in MG, 52 employers (approximately 59.77%) were included in the Dirty List. This highlights the importance of these instruments in holding violators accountable both administratively and civilly.

In summary, the TAC is a highly relevant procedural and administrative tool for the MPT in combating slavery-like labor. Its nature as an extrajudicial enforceable title, the possibility of being negotiated *in loco*, and the growing inclusion of compensation for moral damages (both collective and individual) make it a swift and, to a large extent, effective mechanism for adjusting employer conduct and ensuring the reparation of violated rights. Although there are challenges in monitoring compliance and enforcing judgments, the high rate of adherence and fulfillment of TACs during the period analyzed in Minas Gerais reaffirms its importance as an extrajudicial instrument for the protection of collective rights.

On a national perspective, the Clinic's research found out some important information. In summary, the three most frequent obligations under the terms of consent agreement are: payment of wages, compliance with health and safety rules, and promotion of the registration of workers.



Based on the TACs entered into (649), it was possible to verify compliance with 268 agreements, that is, in 58.7% of the cases, information on the fulfillment of obligations was not found. The TACs that were fully complied with correspond to 65.7% of those whose information was available or, otherwise, represent 21.7% of the signed adjustments. In this last perspective, in 6.8% of the cases, the TACs were partially met; and in 7.4% there was no compliance. It must be remembered that the TAC registration fulfilled can be explained by the absence of recurrence in labor irregularities and can occur even if there is no new inspection at the workplace.

When observing the distribution of these percentages by the Brazilian regions, most of the TAC's fulfilled occurred in the Southeast region (25.6%), followed by the North region (21.6%). Most of the TAC's partially fulfilled occurred in the North (31.8%). The Northeast region also has a large proportion of partial greetings, totaling 27.3%. The Southeast region represents 18.2% and the Midwest and South regions each account for 11.4% of the TAC's partially fulfilled. Concerning TAC's that have not been fulfilled, their largest proportion is found in the North region (29.2%). The Midwest region represents 25% of unfulfilled terms, followed by the Northeast (22.9%), Southeast (14.6%), and South (8.3%).

In 87.3% of the cases in which the TAC was not met, a lawsuit was filed. Observing this breakdown by regions of the country, it is noted that the North region concentrates the highest proportion of lawsuits filed as a result of non-compliance.

According to the information available, the amounts agreed in the TAC's entered into with the Public Ministry of Labor totaled approximately seventeen million reais. The North region added the largest amount and the South region the smallest. The general minimum was verified in the South region and assumed the value of R\$ 1,600.00. The highest amount agreed in the TAC was observed in the Southeast region and reached a total of R\$ 1,500,000.00. The general average was R\$ 63,446.28.



	Valid Number	Minimum	Maximum	Average	Sum
Midwest	52	3,000.00	1,376,880.23	85,617.34	4,452,101.70
Northeast	39	3,600.00	250,000.00	50,002.19	1,950,085.42
North	102	1,670.81	401,395.00	49,095.96	5,007,787.43
Southeast	38	2,000.00	1,500,000.00	115,561.03	4,391,319.04
South	38	1,600.00	140,000.00	33,309.38	1,265,756.35
Brazil	269	1,600.00	1,500,000.00	63,446.28	17,067,049.94

Table 8 - Description of the value agreed in the TAC by region and general

Public Civil Actions (ACP)

The Public Civil Action (ACP) is a highly relevant procedural instrument used by the Labor Prosecution Office (MPT), especially in addressing cases of work analogous to slavery. It is an ordinary civil lawsuit whose main purpose is to protect *metaindividual* rights and interests, including diffuse, collective, and homogeneous individual rights.

The MPT is legally empowered to file such actions in order to seek reparation for harm caused to these interests, which go beyond the individual sphere. The objective is to hold those responsible accountable through obligations to do, not to do, and to provide certain goods or services. In the specific context of slave-like



conditions, the MPT uses ACPs to demand accountability from employers for both moral and material damages resulting from labor exploitation.

A key characteristic of the MPT's workflow is that ACPs are generally filed when it is not possible to reach a Conduct Adjustment Agreement (TAC) with the employer to administratively resolve the identified irregularities. The TAC is the preferred route for extrajudicial resolution, but when an agreement is not feasible or sufficient, the ACP becomes necessary. However, there are cases in which ACPs were filed despite an existing TAC, highlighting situations of noncompliance or complexity that justify judicial action. For example, a TAC may have been signed but not fulfilled and subsequently archived, prompting the filing of an ACP.

The requests made by the MPT in Labor Class Actions involving slave-like labor vary and aim to cover the various rights violated in the employment relationship. They go beyond merely seeking acknowledgment of slavery-like conditions and include demands to regularize working conditions, ensure compliance with health and safety regulations, pay outstanding wages and severance, provide personal protective equipment (PPE), formalize employment contracts (CTPS), and make deposits to the FGTS (Guarantee Fund for Length of Service).

In addition to obligations to act or provide, ACPs commonly include claims for moral damages, both collective and individual. Research in Minas Gerais (2017–2022) and national studies (2008–2019) show that claims for collective moral damages are significantly more frequent (80.1% nationally) than those for individual moral damages (17.6%). Nevertheless, in Minas Gerais, the practice of including individual moral damages in ACPs and TACs has grown in recent years.

When awarded or agreed upon, compensation for collective moral damages may be allocated to the Workers' Support Fund (FAT), or directed to other institutions, social projects, or public entities designated by the MPT. The study



conducted in Minas Gerais, which analyzed 334 labor inspection reports from 2017 to 2022, identified 21 ACPs filed in response to complaints of slave-like labor. Of these, 20 were based on reports that confirmed the existence of such practices. Regarding the procedural outcomes of the 21 actions, most (12, or 57.14%) were resolved through court-approved settlements. Four were in the evidentiary stage at the time of the study, three were partially upheld, and two were fully upheld.

Importantly, none of the ACPs were fully dismissed by the Labor Court. This is explained by the fact that favorable rulings are not necessarily tied to the explicit recognition of slavery-like labor, as decisions may be based on other labor rights violations. Once a ruling is issued or a settlement is approved, the ACP enters the enforcement phase. All five actions that reached a decision proceeded to enforcement. This phase aims to ensure compliance with the obligations established in the ruling or agreement, including the collection of fines and compensation. However, there are various challenges, such as difficulties in locating the defendant's assets, which may lead to suspension of enforcement.

As for procedural timelines, the research analyzed the duration of ACPs in Minas Gerais. The average time between the date of inspection and the filing of the ACP was 298 days. The average time from filing to judgment was 359 days (including cases with and without settlements). However, judicial settlements significantly accelerated proceedings: the average duration from filing to judgment dropped to 271 days when a settlement was reached, compared to 432 days when there was no settlement. From inspection to the beginning of the enforcement phase, the overall average was 600 days, but much shorter in cases involving settlements (an average of 237 days).

Although judicial settlements tend to speed up resolution, the nearly 300-day average between inspection and filing of the ACP can be detrimental to ensuring workers' rights. One reason for this delay is that prosecutors often wait for the completion and submission of the inspection report before filing suit. These detailed



reports prepared by labor inspectors—along with photos, videos, and testimonies—are crucial evidentiary elements supporting the claims and judicial decisions in ACPs.

Therefore, coordinated and cooperative action between institutions such as the MPT and the Ministry of Labor and Employment (MTE) is common in Minas Gerais and contributes to the fact that ACPs often originate from inspection reports. In short, the Public Civil Action is a crucial legal tool used by the MPT in the fight against slave-like labor. It is primarily triggered when no agreement can be reached through a TAC and seeks comprehensive reparation for the damage caused to workers and society. It covers various labor rights violations and, despite variations in its timeline, has a high rate of partial or full success in the Labor Court, with judicial settlements being a key factor in expediting the process.

Nationwide research conducted by the Clinic “ Slave labor on the scales of justice” found out there were 432 actions filed in the period from 2012 to 2019. Thus, observing the distribution of the actions according to the jurisdiction of the Regional Labor Courts (TRT), it verifies that the Labor Prosecutor's Office that works at TRT3 was the one that filed most civil public actions, being responsible for 14.4% of the national amount. Very close to this level is the Attorney's Office that operates in the jurisdiction of TRT8, which accumulates 13.9% of ACPs. Then, there is TRT5, with 10.4% of cases. It is a noteworthy fact that, in seven TRTs, less than 2% of public civil actions filed by MPT in the country are registered.

This analysis encompasses the content of the inspection reports, which gave rise to the filing of public civil actions in the various labor jurisdictions. In most of the actions, there is no express reference to work analogous to slavery, which can be seen in the absence of an explicit request for recognition of the situation. The Labour Court of Minas Gerais is responsible for 50% of the cases in which the inspection report indicates the existence of forced labor.



On the other hand, concerning degrading working conditions, the situation is different. In 87.2% of cases, the Labor Prosecutors could base the public civil action on the occurrence of such a situation (N = 211). Taking as reference the distribution of this total by TRT, it is observed that TRT3, in Minas Gerais, concentrates 18.5% of occurrences of this type, TRT8 marks 15.2%, and TRT5 scores 13%. Twelve TRTs have less than 2% of cases, three of which (TRT13, TRT20, and TRT21) have no action that indicates the existence of degrading working conditions.

Exhausting work hours was observed in 22.7% of the cases (N = 211). Of this total, 20.8% is under the responsibility of TRT3 and 14.6% is related to TRT5. It is important to note that twelve TRTs do not contribute to this total. The situation of debt bondage was verified in 16.6% of the cases (N = 211). TRT5 and TRT8 each account for 17.1% of this total. Then, the TRT3 stands out, which marks 14.3%, and the TRT2 and TRT10, with 11.4% of the cases in which debt bondage could have been found in the public civil action.

From the 432 public civil actions filed, there is information on individual moral damage for 425 cases. In 66.4% of the public civil actions filed, there was no request for individual moral damage. In 17.6% of the cases, this request was made and in 16% the initial petition was not found. TRT5 concentrates the majority of requests for individual moral damage (21.3%). Next is TRT3, which represents 17.3% of that total. It is a noteworthy fact that in four TRTs there was no such request for the benefit of the workers considered individually.

Taking the available data, the amounts required as compensation for individual moral damage totaled almost 20 million reais. TRT14 added the largest amount of claims in this regard, with a value of approximately 12 million reais, also presenting the largest indemnity paid. The lowest amount required was observed in TRT3 and assumed the amount of R\$ 3,000.00. The overall average reached the mark of R\$ 272,972.79.



	Number of Actions	Minimum	Maximum	Average	Sum
TRT1	3	15,000.00	150,000.00	71,666.67	215,000.00
TRT2	2	10,000.00	100,000.00	55,000.00	110,000.00
TRT3	11	3,000.00	160,000.00	53,090.91	584,000.00
TRT4	1	46,850.00	46,850.00	46,850.00	46,850.00
TRT5	16	5,000.00	550,000.00	150,937.50	2,415,000.00
TRT6	0
TRT7	0
TRT8	4	30,000.00	93,351.15	52,087.79	208,351.15
TRT9	2	6,000.00	50,000.00	28,000.00	56,000.00
TRT10	2	20,000.00	100,000.00	60,000.00	120,000.00
TRT11	4	20,000.00	220,000.00	105,000.00	420,000.00
TRT12	2	310,000.00	750,000.00	530,000.00	1,060,000.00
TRT13	0
TRT14	4	10,000.00	12,000,000.00	3,028,750.00	12,115,000.00
TRT15	2	10,000.00	65,000.00	37,500.00	75,000.00
TRT16	2	30,000.00	50,000.00	40,000.00	80,000.00
TRT17	2	20,000.00	30,000.00	25,000.00	50,000.00
TRT18	5	8,000.00	65,000.00	27,000.00	135,000.00
TRT19	1	100,000.00	100,000.00	100,000.00	100,000.00
TRT20	1	323,840.00	323,840.00	323,840.00	323,840.00



TRT21	1	1,000,000.00	1,000,000.00	1,000,000.00	1,000,000.00
TRT22	1	10,000.00	10,000.00	10,000.00	10,000.00
TRT23	6	30,000.00	150,000.00	88,333.33	530,000.00
TRT24	0
Brazil	72	3,000.00	12,000,000.00	272,972.79	19,654,041.15

Table 10 – Descriptive statistics regarding the claim for compensation for individual moral damage by TRT

Claims for collective moral damages are much more frequent and were found in 80.1% of public civil suits. Only 4.0% of the lawsuits did not file a claim for collective moral damage. The remaining number (15.8%) refers to the actions indicated in the list, but whose initial request was not found by the research team (N = 423). Observing the distribution of claims for collective moral damages by TRT, it is noted that TRT8 concentrates 13.9% and TRT3 13% of such claims.

Taking the available data, the required collective moral damage amounts to approximately 1.2 billion reais. TRT15 added the largest amount, with a total of over R\$ 500 million, also presenting the largest indemnity paid. The general minimum was observed in TRT11 and assumed the amount of R\$ 1,000.00. The overall average reached the mark of approximately R\$ 3.55 million per action.

	Valid Number	Minimum	Maximum	Average	Sum
TRT1	11	20000.00	20000000.00	2310909,09	25420000,00
TRT2	10	50000.00	2000000.00	495000,00	4950000,00



TRT3	41	10,000.00	10,000,000.00	1,448,000.00	59,368,000.00
TRT4	6	100,000.00	5,000,000.00	1,050,000.00	6,300,000.00
TRT5	31	20,000.00	3,434,000.00	630,774.19	19,554,000.00
TRT6	5	100,000.00	1,270,000.00	534,000.00	2,670,000.00
TRT7	5	200,000.00	1,000,000.00	647,696.00	3,238,480.00
TRT8	47	30,000.00	10,000,000.00	978,510.64	45,990,000.00
TRT9	10	20,000.00	2,000,000.00	724,500.00	7,245,000.00
TRT10	20	20,000.00	100,000,000.00	6,741,429.58	134,828,591.60
TRT11	15	1,000.00	5,000,000.00	976,733.33	14,651,000.00
TRT12	9	100,000.00	5,000,000.00	1,359,489.11	12,235,402.00
TRT13	2	300,000.00	1,000,000.00	650,000.00	1,300,000.00
TRT14	18	50,000.00	100,000,000.00	11,891,666.67	214,050,000.00
TRT15	18	50,000.00	500,000,000.00	28,321,666.67	509,790,000.00
TRT16	22	30,000.00	19,000,000.00	1,591,363.64	35,010,000.00



TRT17	2	200,000.00	500,000.00	350,000.00	700,000.00
TRT18	22	10,000.00	10,000,000.00	1,372,625.99	30,197,771.80
TRT19	2	200,000.00	1,000,000.00	600,000.00	1,200,000.00
TRT20	4	30,000.00	3,774,069.05	1,498,017.26	5,992,069.05
TRT21	3	1000,000.0 0	5,000,000.00	2,333,333.33	7,000,000.00
TRT22	5	50,000.00	1,000,000.00	510,000.00	2,550,000.00
TRT23	19	150,000.00	6,000,000.00	962,841.58	18,293,990.00
TRT24	6	10,000.00	20,000,000.00	3,568,333.33	21,410,000.00
Brazil	333	1,000.00	500,000,000.00	3,555,388.30	1,183,944,304.4 5

Table 11 - Descriptive statistics relating to the claim for collective moral damages by TRT



Regarding the temporal aspect, the time between the beginning of the ACP and the res judicata marked the minimum of 15 days and the maximum of 3506 days, that is, 9.6 years. The average time in this phase was 486 days and the median indicates that 50% of the cases took up to 291 days between the beginning of the process and its closure.

	N	Minimum	Maximum	Average	Median
Inspection - beginning of the ACP	288	1	2,698	446	291
Beginning of the ACP - First decision	374	3	2,219	357	253
First decision - Appeal filling	133	8	1,552	175	118
Appeal filling - Judgment	116	11	1,652	204	139
Judgment - Appeal filling to Superior Court	56	9	762	266	227



Appeal filling to Superior Court – Judgment	27	47	1,357	380	197
Beginning of the ACP - Closure	295	15	3,506	486	291

Table 17 - Summary of the time between the legal stages of public civil actions

General data on contemporary slavery in Brazil

This section analyzes the most prevalent activities and the states where the highest numbers of workers in conditions analogous to slavery were found. The analysis is based on official and reliable data from the Smartlab and Radar SIT websites. It includes comparative data on variations over time and the number of individuals rescued in each location or economic activity.⁵

The sector with the highest absolute number of people rescued in the historical series (1995–2024) is cattle farming, with 17,040 workers freed, representing the main focus of labor inspections over time. Despite a decline in recent years, it remains one of the most critical sectors. Another highlight is coffee cultivation, which leads the ranking over the past five years, with 1,716 people rescued during this period. In the historical total, the sector accounts for 3,824 rescued workers, with a peak of 784 cases in 2003. Nonetheless, in 2024, there was a 28.5% decrease compared to 2023, with 226 workers rescued.

⁵SMARTLAB. Setores econômicos de resgate. Disponível em: [Smartlab - Retrato de Localidade - Observatório da Erradicação do Trabalho Escravo e Tráfico de Pessoas](#). Acesso em: 26 mai. 2025.



Economic Sector	Total Rescued	Peak Year
Cattle raising	17,040	2,833 (2003)
Sugarcane cultivation	8,373	3,107 (2007)
Forest production – native forests	4,510	519 (2008)
Coffee cultivation	3,824	784 (2003)
Building construction	2,754	659 (2013)
Alcohol manufacturing	2,628	1,106 (2005)
Cultivation of temporary crops not previously specified	2,598	359 (2024)

Other relevant sectors include building construction, with a total of 2,754 workers rescued and a significant increase of 109.3% between 2023 (140 rescued) and 2024 (293), as well as the cultivation of temporary crops not previously specified, which recorded a total of 2,598 rescues and a 69.3% growth in the past year. Agricultural support activities also stand out, with 1,638 people rescued during the analyzed period, although they saw a 62.4% drop from 2023 to 2024. Horticulture, while having a smaller total number of 239 rescued workers, experienced an alarming increase of 546.2%, rising from 13 rescued in 2023 to 84 in 2024.

The data presented paint a troubling and revealing picture of the economic activities with the highest prevalence of slave labor in Brazil between 1995 and 2024, especially in the last five years. The information shows that the problem is concentrated in sectors with intense labor demands, low wages, and minimal skill requirements—conditions often associated with precarious work environments and social vulnerability.

Regarding the states with the highest incidence of slave labor in Brazil from 1995 to 2024, the state of Pará leads the historical series with 13,479 workers rescued, while Minas Gerais stands out as the state with the most rescues in the past



five years, totaling 4,329 people freed. In the historical total, Minas Gerais accounts for 7,598 rescued individuals, with a peak in 2022 (1,022 cases), although it recorded a 25.7% drop between 2023 and 2024.

Other states with significant numbers include Goiás, with 5,580 rescues, although it saw a sharp reduction of 79.2% from 2023 to 2024 (from 745 to 155 cases); and Bahia, with 3,810 workers rescued, which experienced a notable increase of 127.6%, jumping from 87 cases in 2023 to 198 in 2024. São Paulo also stands out, with 3,036 rescues and a 25.7% increase over the past two years, reaching 479 cases in 2024.

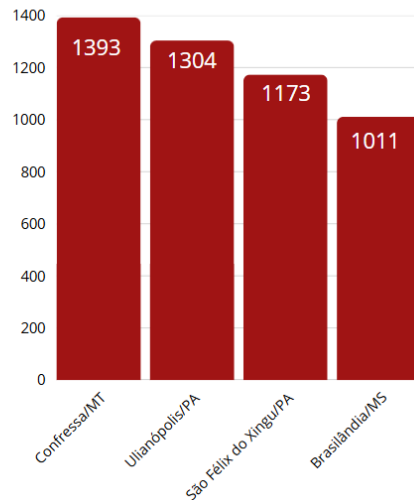
Other states that drew attention due to percentage growth in rescues include Pernambuco, which went from 24 rescued in 2023 to 137 in 2024—a 470.8% increase—and Mato Grosso do Sul, with a 36.4% rise over the same period. Espírito Santo saw a slight decline of 7.8%, while Maranhão—a state historically associated with sending workers to other regions—showed a 44.9% increase, with 113 rescues in 2024.⁶

Regarding the municipalities, the one with the highest number of rescues during this period was Confresa, in the state of Mato Grosso, with a total of 1,393 people rescued. São Paulo/SP, on the other hand, leads the ranking for the past five years, with 432 workers rescued.

⁶ SMARTLAB. Setores econômicos de resgate. Disponível em: [Smartlab - Retrato de Localidade - Observatório da Erradicação do Trabalho Escravo e Tráfico de Pessoas](#). Acesso em: 26 mai. 2025.



NUMBER OF RESCUED VICTIMS 1995-2024



In 2024, Camaçari (BA) recorded a peak of 163 rescues, the highest number among the municipalities analyzed. This was the only year with such occurrences in the municipality, representing a sharp increase compared to 2023, which had zero cases. A similar pattern was observed in Jeriquara (SP), with 121 rescues in 2024, also starting from zero in the previous year. Guariba (SP) reported 87 rescues in 2024, while São Paulo (SP) had 83 rescues in the same year — a 27.2% decrease compared to the 114 recorded in 2023.

Itapeva (SP) registered 82 rescues in 2024, after having none the previous year. Ibiá (MG) had 78 rescues, and Ipojuca (PE), with 71 rescues in 2024, showed a significant increase compared to 2023, when there was only one case — a variation of +7,000%.⁷

These figures demonstrate that contemporary slave labor remains a serious and widespread issue across various regions of the country, especially in states with high agricultural, livestock, and construction activity.

⁷ SMARTLAB. Setores econômicos de resgate. Disponível em: [Smartlab - Retrato de Localidade - Observatório da Erradicação do Trabalho Escravo e Tráfico de Pessoas](#). Acesso em: 26 mai. 2025.



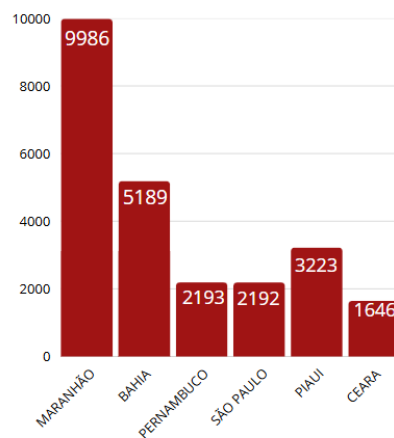
The economic dynamism of these areas, combined with social vulnerability and low levels of education among workers, creates fertile ground for exploitation. Furthermore, the data underscore the importance of ongoing labor inspections and the strengthening of public policies to combat slave labor.

The analysis covers both historical trends and recent developments, highlighting both encouraging progress in overall reduction rates and persistent challenges in specific sectors and regions.

The section further details the nature of exploitative work across agricultural, industrial, and service sectors, while examining the socioeconomic factors that contribute to vulnerability. Special focus is given to the most hazardous forms of child labor, including commercial sexual exploitation, forced labor conditions, and activities that expose children to physical and psychological harm.

Another overview of the data on rescued workers are the profile, data and place of origin. According to data from SmartLab and Radar SIT, most workers rescued from slavery-like conditions in Brazil come from poor and rural areas, especially in the Northeast region. The states that most appear as the place of origin of these workers are Maranhão, Piauí, Bahia, Ceará, and Pará.

WHERE WERE RESCUED VICTIMS BORN
1995 - 2024





Radar SIT and SmartLab data indicate that most rescued workers originate from rural and economically vulnerable regions. Maranhão stands out as a primary state of origin in the Northeast region, while Pará is notable both as a place of origin and as a major destination for labor exploitation in the North.

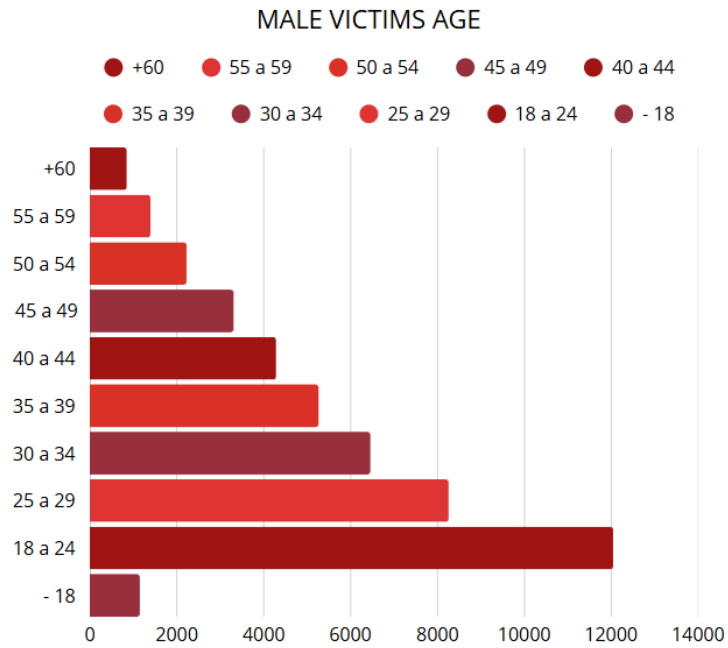
The SmartLab data includes information about the racial profile of workers rescued from slavery-like conditions in Brazil. According to the available statistics, the majority of these workers identify as black/brown (*pardo*) - 52.7% - reflecting the deep social inequalities and racial vulnerabilities in the country. This data highlights that Afro-Brazilian populations are disproportionately affected by slavery-like labor conditions, reinforcing the need for targeted public policies to combat exploitation and promote social inclusion.

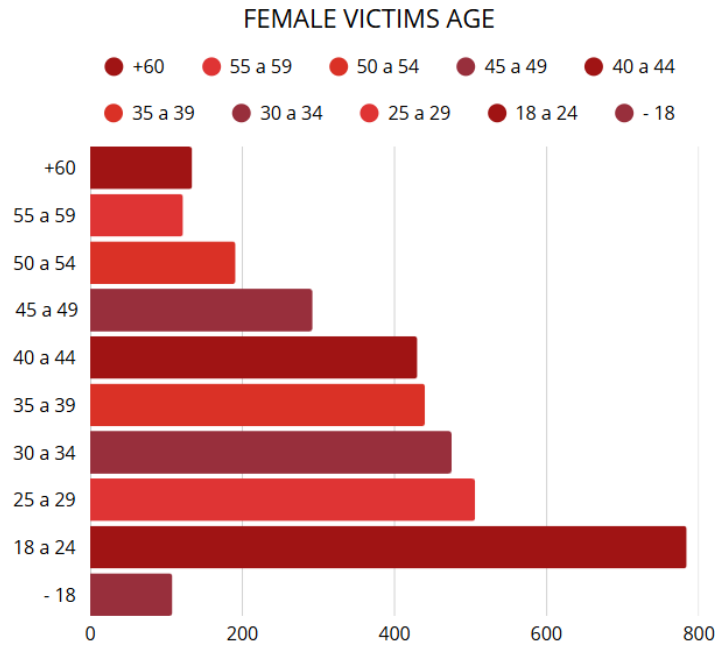
Besides that, most workers rescued from slavery-like conditions in Brazil have low levels of education. Between 2002 and 2004, research has shown that the majority have incomplete primary education (32.8%) or are illiterate (25.5%), which reflects the socio-economic vulnerabilities that increase their risk of exploitation. This low educational attainment limits their employment opportunities and contributes to their susceptibility to conditions analogous to slavery.

An additional perspective of the rescued workers' profile involves their age and gender. According to data from SmartLab (2002–2004), the majority of the victims identified during this period were men, especially young adults. Men between 18 and 24 years old represented the largest group, with 12,039 rescued individuals. The following age groups also registered high numbers: 8,256 (25–29 years), 6,453 (30–34 years), and 5,363 (35–39 years). Among women, although the total number is considerably smaller, the largest group was also 18–24 years old, with 784 rescued workers, followed by 506 (25–29 years) and 475 (30–34 years). These figures show a clear tendency: forced labor primarily affects young men in



their most productive years, but also highlights the presence of women in vulnerable conditions, even if in smaller proportions.





These data help build a comprehensive understanding of the structural inequalities that sustain slavery-like labor conditions in Brazil. The recurring origin of workers from the Northeast and North regions — particularly from Maranhão, Piauí, Bahia, Ceará, and Pará — alongside their common racial, educational, age, and gender profiles, points to a cycle of vulnerability driven by poverty, lack of opportunity, and historical exclusion. Recognizing these patterns is essential for the development of more effective public policies aimed at prevention, protection, and social reintegration of victims.

The information provided by SmartLab and Radar SIT plays a crucial role in shedding light on the real face of modern slavery in the country.

Overview of the Brazilian state of Minas Gerais



Contemporary slave labor has become particularly visible in the state of Minas Gerais, which has consistently led national statistics in both the number of workers rescued and the volume of labor inspections conducted since 2013.

Between 2017 and 2022, 422 labor inspections were carried out in Minas Gerais, resulting in 334 inspection reports. The apparent discrepancy between the number of inspections and reports is due to the fact that a single report may contain information from one or more inspections.

The actions generally begin through complaints, which in Minas Gerais were often submitted directly by workers via WhatsApp messages sent to a member of the state's mobile group for combating slave labor. This group consists of six labor inspectors working generally throughout the state and two inspectors dedicated specifically to domestic slave labor cases.

The study identified seven reports concerning domestic slave labor during the 2017–2022 period. The significant increase can mainly be explained by the wide publicity of the Madalena case, which was covered even by international media.

Not all complaints were confirmed, as evidenced by the total number of cases in which slave-like labor practices were actually identified. Between 2017 and 2022, slave labor was confirmed in 173 out of 334 inspections — that is, 51.79% of the cases.

Number of inspections where slave-like labor practices were confirmed	173
Number of inspections where slave-like labor practices were not confirmed	161
Total number of inspections	334

There was a noticeable increase in the number of reports confirming conditions analogous to slavery, along with a significant rise in operations. For instance, in 2017, there were 29 inspection reports, and 14 (48.27%) confirmed slave-like labor. In 2018, this number nearly doubled, with 24 reports out of 37



inspections (64.86%). In 2021, the highest number was recorded: 42 reports, representing 45.65% of the 92 inspections that year.

YEAR	INSPECTIONS	CONFIRMED PRACTICE	%
2017	29	14	48.27%
2018	37	24	64.86%
2019	44	32	72.72%
2020	55	30	54.54%
2021	92	42	45.65%
2022	77	31	40.25%
Total	334	173	100%

Notably, even during the COVID-19 pandemic years, Minas Gerais continued to lead the national ranking of rescued workers, and the number of reports confirming contemporary slave labor remained significantly higher than in the previous study.

Out of 9,310 workers reached by the inspections, 6,716 (72.1%) were in situations analogous to slavery, and 3,020 were rescued. It is important to clarify that this total includes all 334 actions, including cases where slave labor was not recognized.

The total amount of severance payments was R\$14,327,789.10. During this period, 2,064 workers received unemployment insurance (rescue modality), as provided by Law No. 10.608/02. In comparison, the previous study covering 2004 to 2017 recorded 3,419 workers rescued, 3,050 receiving special unemployment insurance, and R\$11,718,761.59 in severance payments.



	Total	Confirmed slave - like labor	%	Non confirmed slave - like labor	%
Reached workers	9130	6716	72,1	2594	27,81
Rescued workers	3020	3020	100	0	0
Workers who received unemployment insurance	2064	2064	100	0	0
Total Severance payment	R\$ 14.326.789,10	R\$ 14.318.876,30	99,93	R\$ 8.912,80	0,07
Indemnity payments	R\$12.734.142,70	R\$ 12.732.142,70	98,98	R\$ 26.999,78	0,02

There has been a significant increase in both the percentage of rescued workers and confirmed slave labor cases in the more recent period. In the previous study, of the 3,419 rescued workers, 3,298 were in slave-like conditions, totaling 96.46%.

As for severance and indemnity payments, the increase in compensation for moral damages is striking. In the previous study, from 2003 to 2017, total compensation reached R\$1,866,968.60, mostly obtained through lawsuits filed after the fact. According to the reports, indemnity payments began during inspections only after 2013.

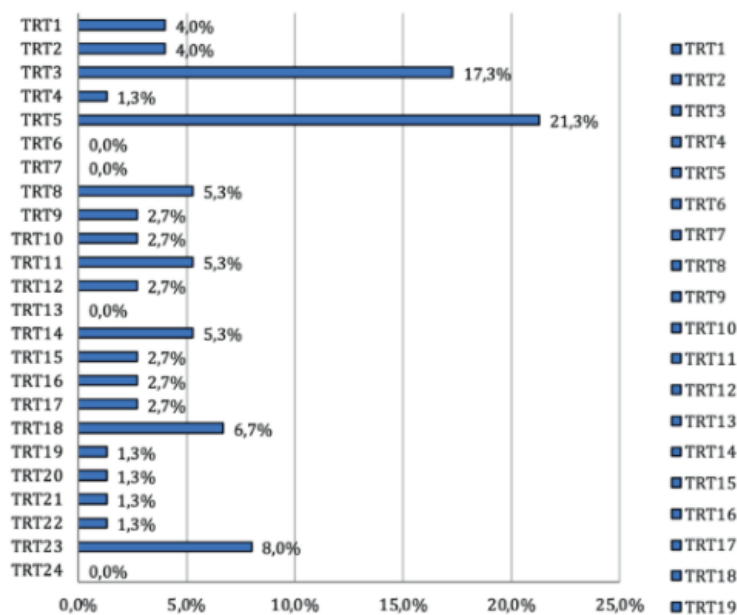
Year	Total Number of TACs	Number of TACs that Determined Payment of Collective Moral Damages	%
2017	3	2	66.66%
2018	7	7	100%
2019	16	14	87.5%
2020	15	12	80%
2021	22	20	90.9%
2022	10	7	70%



In the study from 2017 to 2023, the value of moral damage compensation reached R\$8,658,355.72 over six years. The amount in TACs totaled R\$1,838,787.00, and in ACPs, R\$167,000.00 for individual moral damages and R\$2,070,000.00 for collective moral damages. The total verified amount for moral damages was R\$12,734,142.70, of which 99.98% corresponded to confirmed slave labor cases.

This increase in compensation was accompanied by a shift in the approach of MPT members, who are responsible for drafting clauses in TACs and formulating claims in Public Civil Actions (ACPs).

At the conclusion of the previous study in early 2017, it was uncommon to include individual moral damages in TAC clauses or ACP claims. Even in 2020, with the national study “Slave Labor on the Scales of Justice⁸” such provisions were still rare. For example, it was found that in 66.4% of the 432 ACPs analyzed nationwide, no claims for individual moral damages had been made.



ACP distribution according to individual indemnity claims

⁸ HADDAD, Carlos HB.; MIRAGLIA, Livia M, M.; Raio-x das ações judiciais de trabalho escravo (2008 a 2019). 1. ed. Belo Horizonte. Disponível em: <https://www.gov.br/participamaisbrasil/publicacoes1>.



In the study of Minas Gerais' cases from 2017 to 2023, 21 ACPs were filed in labor courts, and in 10 of them, the claims for individual moral damages were granted. Of the 87 TACs signed, 77 included provisions for moral damages. Regarding the number of infractions issued, Brazilian Work and Social Security Cards (CTPS) issued, TACs signed, ACPs filed, and employers added to the Dirty List, a substantial increase in figures related to slave labor cases was observed.

In the previous study (2004–2017), 5,035 infractions were issued in 373 inspections — an average of 13.5 per inspection. Of these, 149 resulted in TACs with the Brazilian Federal Labor Prosecution Office (Ministério Público do Trabalho – MPT), and 30 ACPs were filed. The employer was added to the Dirty List in 104 cases.

In the current study (2017–2022), 3,974 infractions were issued, 167 CTPS documents were issued, 105 TACs were signed, 21 ACPs were filed, and 108 employers were added to the Dirty List.

It should be noted that over 80% of infractions, CTPS, TACs, and ACPs were linked to confirmed slave labor cases — a significant increase compared to the previous study, in which percentages ranged from 58.39% for TACs to 95.42% for CTPS. There was also a notable discrepancy in Dirty List entries, previously at 96.15%. A marked increase in inspections was observed in 2021 and 2022, accounting for 50.5% of all actions since 2017. Paradoxically, 2017 had the lowest rate of operations (8.7%), even lower than during the COVID-19 pandemic.

Public Civil Action

Year	Inspections	Slave Labor Confirmed	Slave Labor Not Confirmed
2017	29	1	0
2018	37	0	1
2019	44	6	0
2020	55	3	0
2021	92	8	0
2022	77	2	0
Total	334	20	1



These figures highlight the essential role of public policy in ensuring the execution of inspections to investigate complaints and eradicate illicit practices. Without the budgetary disclaimer, one could argue that slave labor was nearly nonexistent in Minas Gerais in 2017, given that only 14 reports confirmed the crime — a finding that affects all other related indicators and reaffirms the hypothesis that Minas Gerais, while leading in the number of rescues, is not necessarily the state with the most cases of slave labor.

Minas Gerais has its own specialized team dedicated to rescuing workers subjected to conditions analogous to slavery, which also helps explain the high number of inspections in the state and the increased rates of reports, rescues, TACs, and ACPs. A specialized team, made up of agents aware of the importance of their role, is better equipped to identify complaints with sufficient evidence, and they have a deeper understanding of the local reality, the workings of companies, the most risk-prone activities, and the peak periods of seasonal labor.

The cohesion of the inspection team also influences the structure and performance of partner institutions such as the MPT, PRF (Federal Highway Police), PF (Federal Police), MPF (Federal Prosecution Office), DPU (Federal Public Defender's Office), and other actors involved in inspections. This cohesion facilitates communication and the organization of operations, as well as the execution of post-rescue actions. This hypothesis was confirmed in the four inspections in which the Clinic participated as an observer. Labor inspectors had already identified, based on the complaints, which cases should be prioritized according to planting and harvesting periods, the seriousness of the reports, and the images received.

The fact that these teams have worked together for some time in slave labor operations across different regions of the state contributes, in our view, to a more cohesive and consistent understanding of the elements that characterize conditions analogous to slavery. This is extremely important for consolidating the concept among the various institutions involved in the operations and for the stability and unity of the legal framework. Occasional divergences and discussions between



experienced public agents from different institutions help broaden the perspective on the issue and improve practices, definitions, and even the development of public policies.

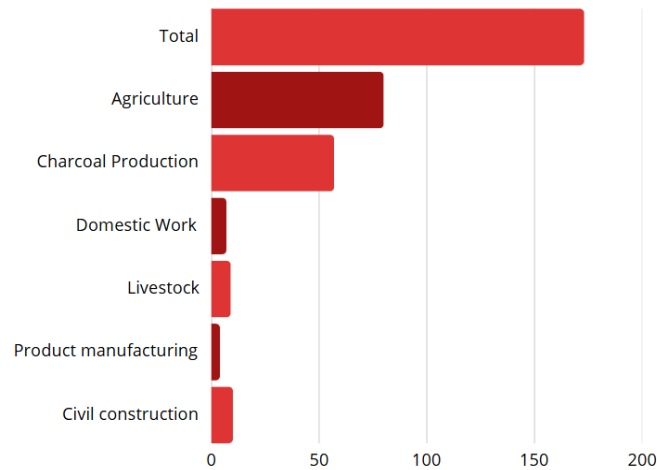
In addition to rescuing workers and ensuring the payment of labor compensation and any due indemnities—as well as the return of the workers to their place of origin—the outcome of the group's work is a substantiated report written by the labor audit team. The report resulting from the inspection is a document with legal evidentiary status and constitutes an important piece of evidence in labor and criminal proceedings. Therefore, it must describe the situation found in a thorough and detailed manner, and must be as technical and impartial as possible.

It is worth noting that many of these documents include photographs of the site inspected by the auditors. These images are of great importance, as they provide more concrete evidence for concepts that may seem abstract to judges, requiring normative assessment, such as the definition of "degrading working conditions."

Predominant economic activities



In terms of the nature of the activities involved, rural labor continues to predominate, particularly in the sectors of agriculture and charcoal production, which accounted for 80 and 57 cases, respectively. Coffee cultivation also deserves mention, with 51 records.



A brief comparative analysis with findings from the previous research period (2004–2017) is helpful to understand the changes. While the placement of the most affected sectors has remained unchanged, there has been a notable increase in the number of reported cases in agriculture and charcoal production. In the earlier study, agriculture registered 56 cases, charcoal production 35, and coffee cultivation 34.

This increase can be attributed to a higher number of inspections and rescue operations in recent years. The establishment of specialized enforcement teams may also help explain the rise, as inspectors and prosecutors from “Ministério Público do Trabalho” (MPT) have developed enhanced expertise, enabling them to conduct more targeted and efficient interventions. Such progress contributes to the accuracy in identifying the times, places, and sectors most at risk for contemporary forms of slavery within the state

Construction emerged as the third most frequently identified sector, with 10 cases. It is worth highlighting the significant decline in this area, which had recorded 33 cases in the previous study - over three times less than the current figure.



Cattle ranching occupies the fourth position, with nine cases, followed by domestic work in fifth place, with seven cases (up from only one in the previous report), and manufacturing in sixth, with four. The remaining sectors - commerce, food production, car washes, energy production, sawmilling, and service provision - each accounted for one case. It is also significant that no cases were reported in the mining sector during this period, despite having ranked sixth with six cases in the previous study. This absence should not be interpreted as an eradication of slave labor in the mining industry, but rather as a potential indication of the lack of inspection activities targeting this sector between 2017 and 2022.

An additional noteworthy point is that 5.2% of the establishments (nine in total) were involved in more than one type of activity. In 94.8% of the cases, however, the activity in which conditions analogous to slavery were identified was the sole economic activity performed by the employer.

Victim's profile

Between the years 2017 and 2023, in Minas Gerais, according to Radar/SIT data,⁹ 4,357 workers were rescued. The main variables regarding the profile of those rescued will be now analyzed, in order to investigate whether it is possible to establish a demographic pattern of potential victims.

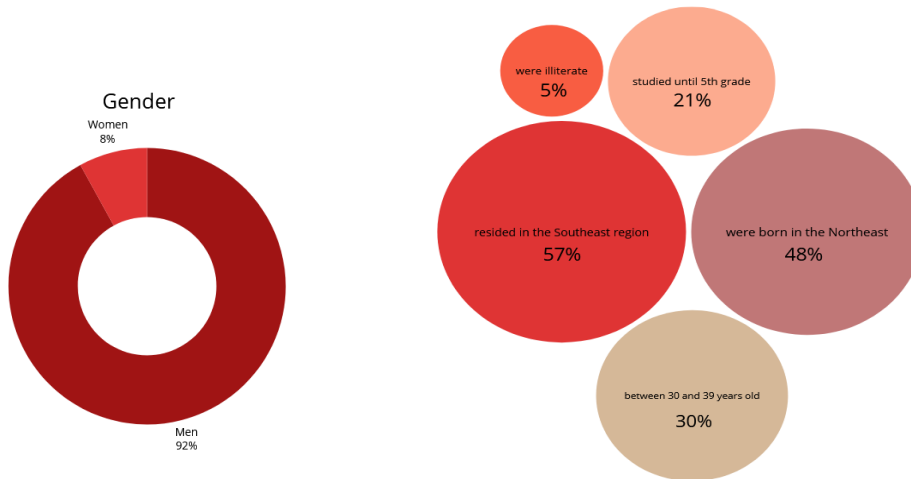
From the analysis of data related to the general profile of rescued workers in Brazil, it is clear that most victims are black. This fact stems from the historical exploitation of slave labor throughout the country's formation and represents the legacy of a past that still haunts us, making May 13, 1888—the date of the abolition of slavery in Brazil—the longest day in our history, with effects still felt today.

Minas Gerais also bears the marks of colonial Brazil, reflected in the social profile data of those rescued from slavery in the state. In 2022, 92% of those rescued

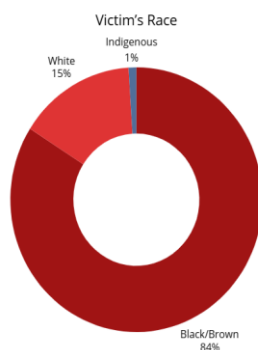
⁹ BRASIL. Portal da Inspeção do Trabalho. Radar SIT. Brazilian Labor Inspection Statistical Dashboard, Brasília, DF. [2021]. Disponível em: <https://sit.trabalho.gov.br/radar/>. Acesso em: 26 mai. 2025.



were men, 30% were between 30 and 39 years old, 57% resided in the Southeast region, 48% were born in the Northeast, 21% reported having studied only up to the incomplete 5th grade, and 5% were illiterate¹⁰.



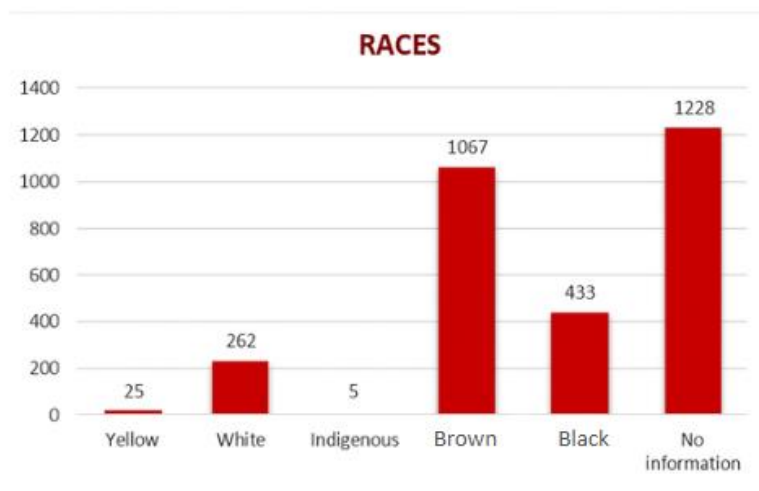
Regarding race, 84% self-identified as black or brown, 15% as white, and 1% as Indigenous. However, this data was obtained through self-declaration on unemployment insurance forms, and it is worth noting that the number of declarations is relatively lower than the total number of rescued victims.



¹⁰ HADDAD, Carlos H.B; MIRAGLIA, Livia M.M; PEREIRA, Marcela Rage. "FROM THE INFRACTION NOTICES TO THE PUBLIC CIVIL ACTIONS: a report about the work analogous to slavery in Minas Gerais", Editora Expert, 2023.



According to research by the Clinic, which analyzed infraction reports and Public Civil Actions in Minas Gerais, there is still limited racial information in the inspection reports. Of the 3,020 rescued individuals, 1,236 had no information recorded. Of the remaining 1,784, 433 were identified as black, and 1,067 as brown, representing 59.8% of the rescued individuals—a percentage very close to the one found in SIT’s analysis of self-declarations in the unemployment insurance forms.



To better clarify these terms: a brown person in Brazil, according to the Brazilian Institute of Geography and Statistics, includes people who declare themselves as a mix of a black person and someone of another race.

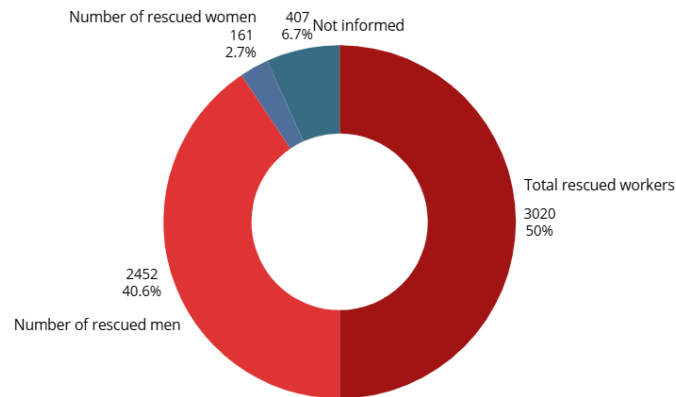
As for the gender of the victims, although 92% of workers rescued in 2022 were men, the specificity of domestic slave-like labor, which will be addressed in more detail in a later section, must also be highlighted. Between 2017 and 2022, 11 people were rescued in such situations—seven women and four men.¹¹

Out of the 3,020 rescued, 2,452 were men, accounting for 81.2% of the total. If we exclude the reports with no gender information, the percentage of men rises to

¹¹HADDAD, Carlos H.B; MIRAGLIA, Livia M.M; PEREIRA, Marcela Rage. “FROM THE INFRACTION NOTICES TO THE PUBLIC CIVIL ACTIONS: a report about the work analogous to slavery in Minas Gerais”, Editora Expert, 2023.



93.8%. Meanwhile, women, who represent 161 rescued individuals, make up 5.2% of the total, or 6.1% if we exclude those without gender data.¹²



Regarding origin, Maranhão has historically been the leading state of birth and residence, with 22% of rescued individuals born there and 17% residing there at the time of rescue¹³. Maranhão has one of the lowest Human Development Index (HDI) scores in Brazil.

Minas Gerais, despite its high HDI (0.774), has significant regional disparities, with the northern region having the lowest HDI, IPQV, and IDS. Consequently, the highest number of rescues—55—during the analyzed period occurred in the North, accounting for 31.8% of the operations.

It can be inferred from the data presented that poverty, misery, unemployment, and hunger—alongside the lack of basic rights such as health, housing, sanitation, education, and access to decent labor markets—are decisive factors for the vulnerability of workers who find themselves in situations where

¹² Idem.

¹³ BRASIL. Portal da Inspeção do Trabalho. Radar SIT. Brazilian Labor Inspection Statistical Dashboard, Brasília, DF. [2021]. Disponível em: <https://sit.trabalho.gov.br/radar/>. Acesso em: 26 maio. 2025.



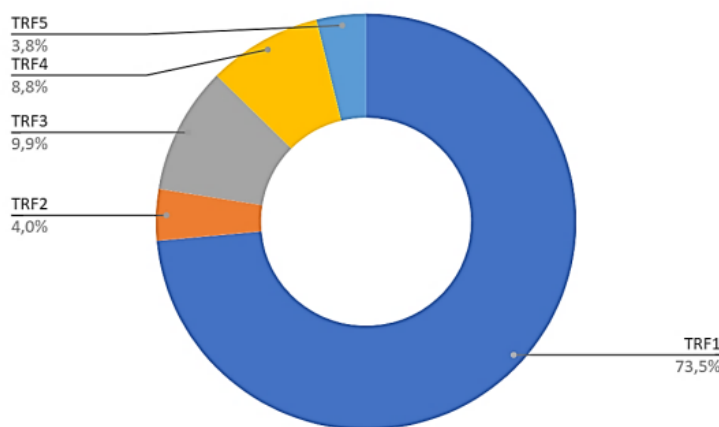
they have no choice, making them susceptible to any kind of work, including that analogous to slavery.

Furthermore, the numbers confirm that, in addition to race and gender, slave labor also has a class component, as those rescued are typically from municipalities with low human development indexes.

General criminal data

The criminal prosecution of contemporary slavery in Brazil exhibits profound asymmetries across jurisdictions and stages of the justice process, reflecting what this study refers to as the *Pyramid of Impunity*. This section analyzes 1,464 criminal cases related to slave-like labor conditions documented in the national database, with attention to their geographical distribution, the role of labor inspections, and procedural challenges.

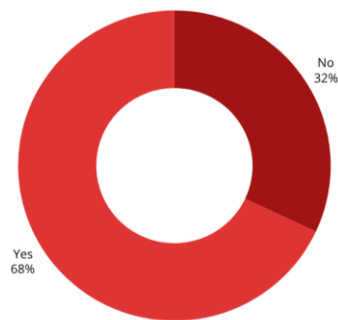
The Brazilian federal judiciary is divided into five Regional Federal Courts (Tribunais Regionais Federais, or TRFs). Among these, the TRF1—covering states such as Minas Gerais, Pará, and Maranhão—concentrates a disproportionate majority of the cases: 73.5% of the criminal proceedings. TRF3 (São Paulo and Mato Grosso do Sul) and TRF4 (southern states) each hold 9.9% and 8.8%, respectively, while TRF2 and TRF5 together comprise only 7.8% of the cases.



Distribution of Criminal Cases by TRF (N = 1464)

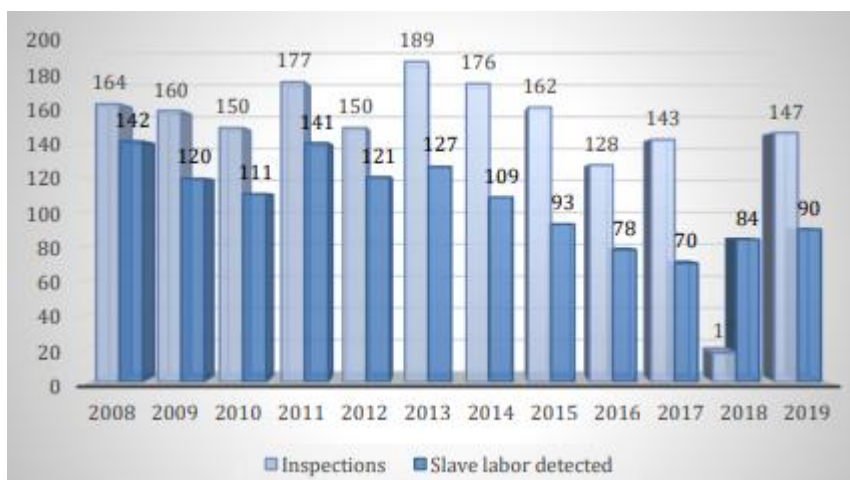


This concentration not only indicates the regional prevalence of slave labor conditions but also the location-based institutional engagement of federal prosecutors and courts with the issue. Between 2008 and 2019, labor inspectors conducted 1,883 field inspections across Brazil, of which 1,286 confirmed the occurrence of slave labor, yielding a confirmation rate of 68%. This suggests a high correlation between prior denunciations and actual findings of labor exploitation.



Confirmation of Slave Labor in Inspections (N = 1883)

Annual variation in confirmation rates is significant. The highest detection rate was in 2012, with 80.6%, while the lowest occurred in 2017, with 48.9%. These fluctuations reflect not only changing enforcement patterns but also shifting political and institutional priorities.



Relationship Between Inspections and Slave Labor Detection (2008–2019)



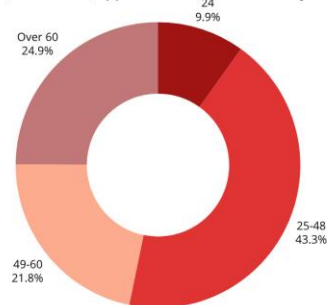
Yet, not all inspections led to criminal prosecution. Among the 1,464 criminal cases reviewed, only 1,090 were accompanied by identifiable inspection reports, which often form the evidentiary foundation for criminal charges. This evidentiary gap illustrates a systemic bottleneck between administrative enforcement and criminal accountability, reinforcing the base of the Pyramid of Impunity.

Unlike public civil actions, which more consistently include initial petitions and complete procedural trails, many criminal cases lack transparency or documentation about their preliminary phases. This raises questions about due process, prosecutorial discretion, and the institutional ability to transform administrative violations into criminal sanctions. Such issues are central to understanding the inertia at the middle and upper levels of the impunity pyramid.

Between 2008 and December 31, 2019, Brazil recorded 1,464 criminal cases for the crime of reducing someone to a condition analogous to slavery (Article 149 of the Penal Code), implicating 2,679 defendants. However, only 441 individuals— or 16.4%—were convicted in the first instance. This data reflects a deeply rooted pattern of impunity, which becomes even more pronounced as cases progress through the appeals system.

The data from TRF1 illustrates a significant decline in conviction rates after appeals. Initially, some convictions are achieved, but post-appellate review leads to a surge in acquittals and a reduction in sentences.

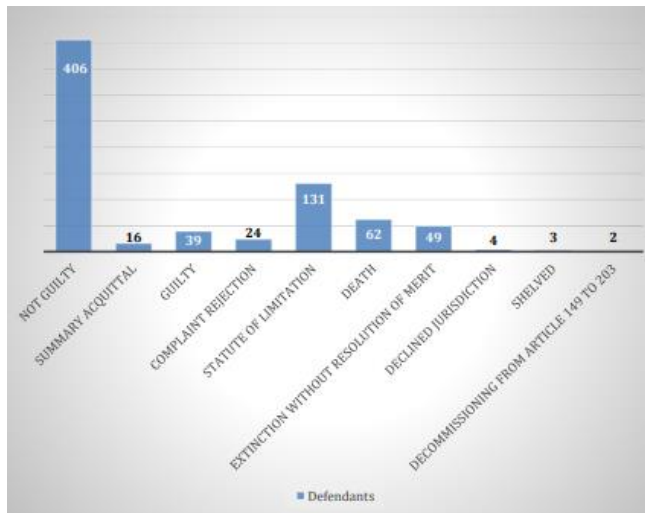
Sentences, in months, applied in cases under TRF1 jurisdiction



Sentences applied in TRF1 (months)



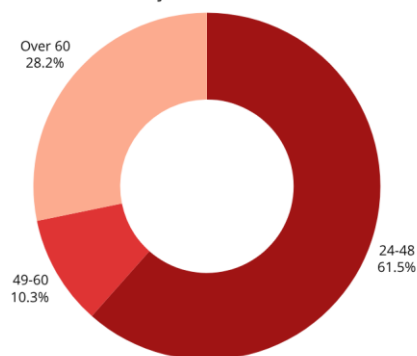
Most penalties ranged between 25–60 months, but with only a few sentences exceeding 60 months.



Final Judgment Results in TRF1

The number of convictions dropped significantly, with 406 individuals acquitted and only a handful convicted.

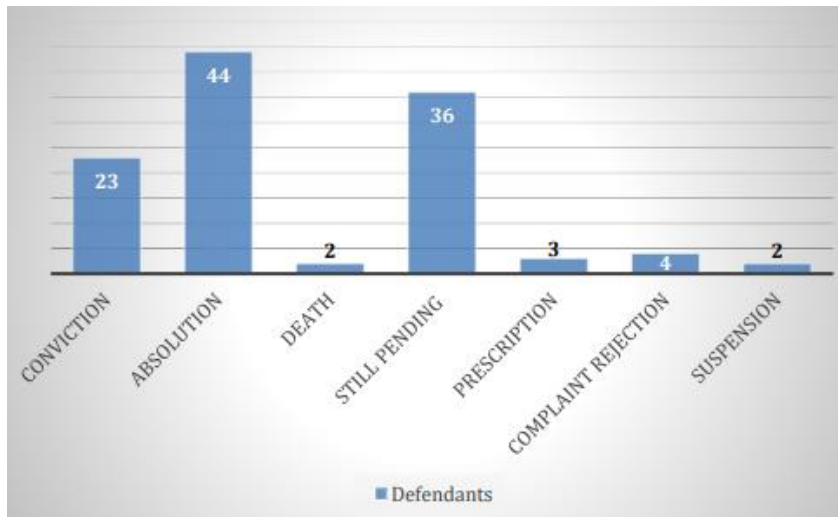
Sentences, in months, applied to final convictions under TRF1 jurisdiction



Convictions culminated in lighter sentences, reinforcing the pattern of reduced punitive outcomes.

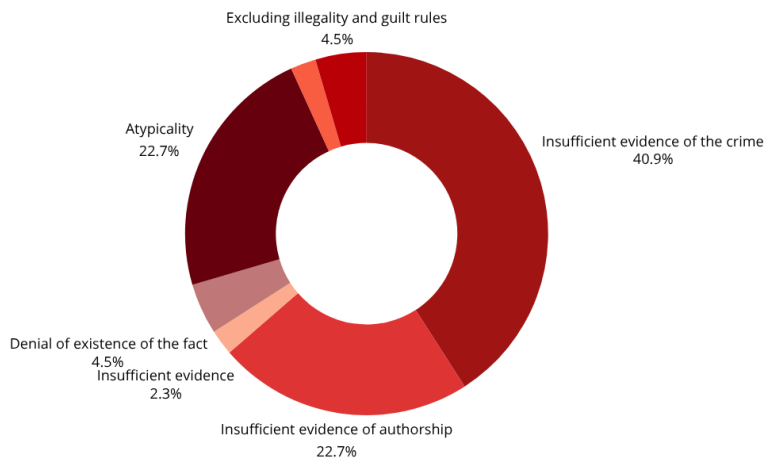


In TRF2, 114 individuals were indicted across 58 cases. The court displays a strong tendency towards acquittals, largely based on insufficient evidence or claims of atypical conduct.



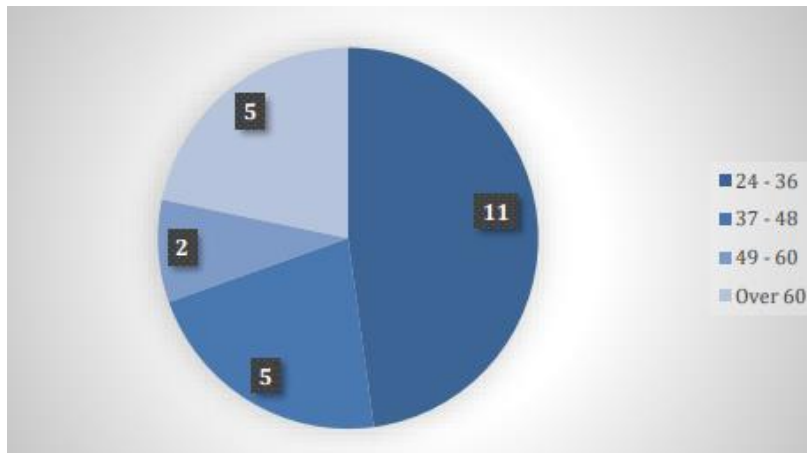
Result of judgments under TRF2 jurisdiction

Basis of acquittal decisions under TRF2 jurisdiction



Basis of acquittal decisions under TRF2 jurisdiction

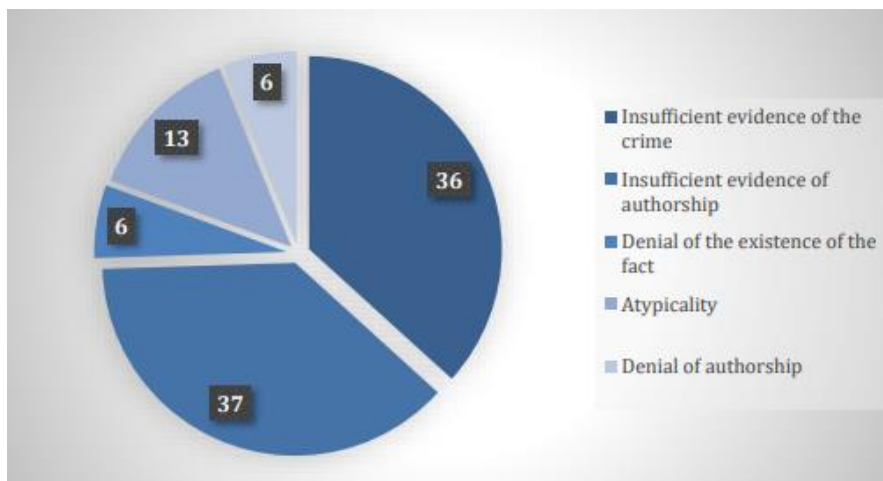
Acquittals stemmed primarily from "insufficient evidence of the crime" and "insufficient evidence of authorship."



Sentences, in months, applied to cases under TRF2 jurisdiction

The vast majority of sentences were below 4 years. After appeals, most punishments were converted to alternatives such as community service, with convictions dropping to just 12.

TRF3 handled 145 cases with 281 defendants. Like TRF2, acquittals were the dominant outcome.



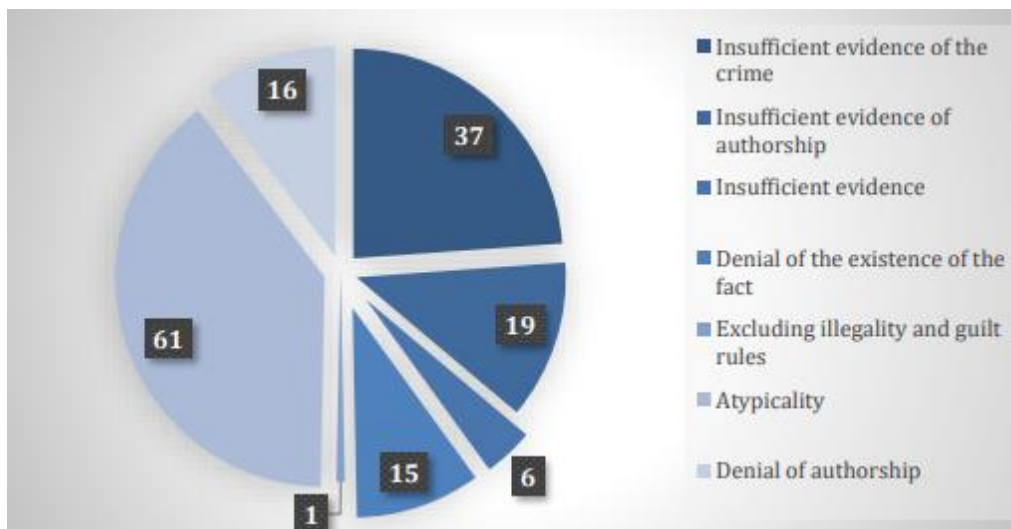
Basis of acquittal decisions under TRF3 jurisdiction

Again, insufficient evidence was the most cited reason for acquittals. Sentences rarely exceeded 48 months.



Only 28 convictions persisted post-appeal, and even these were marked by reduced punishments, predominantly below 4 years.

From 2008 to 2019, TRF4 oversaw 131 cases involving 259 defendants. It reported the highest number of post-appeal convictions (30), although this still represents a significant attrition from first-instance outcomes.

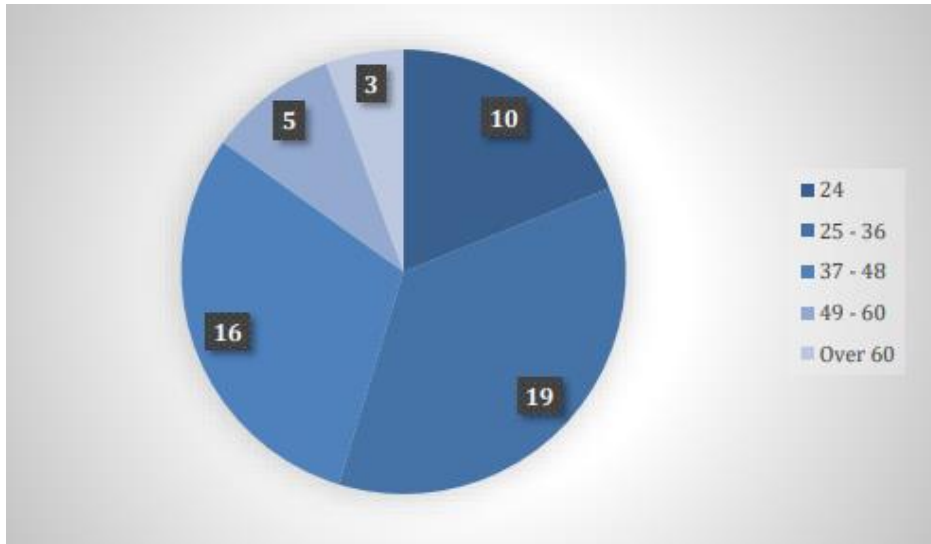


Basis of acquittal decisions under TRF4 jurisdiction



Atypicality and Insufficient Evidence:

TRF4 stands out for having atypicality (i.e., behavior not fitting criminal typology) as a major basis for acquittals (40.3%).

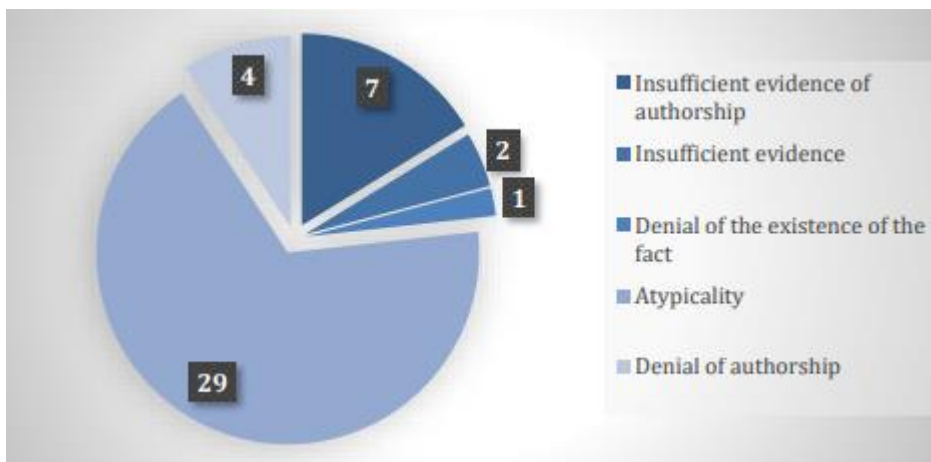


Sentences, in months, applied to cases under TRF4 jurisdiction

Sentences:

Most convictions remained below four years, with potential for substitution by alternative penalties.

TRF5 had the smallest volume: 55 cases and 82 defendants. Acquittals again prevailed, mostly justified by atypicality.

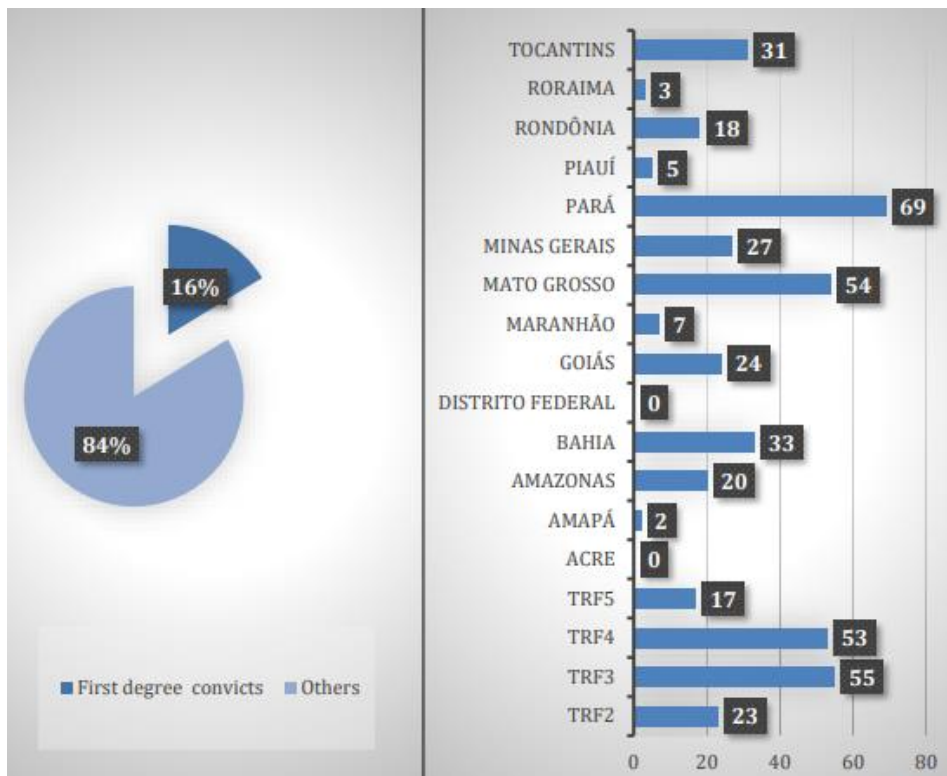


Basis of acquittal decisions under TRF5 jurisdiction



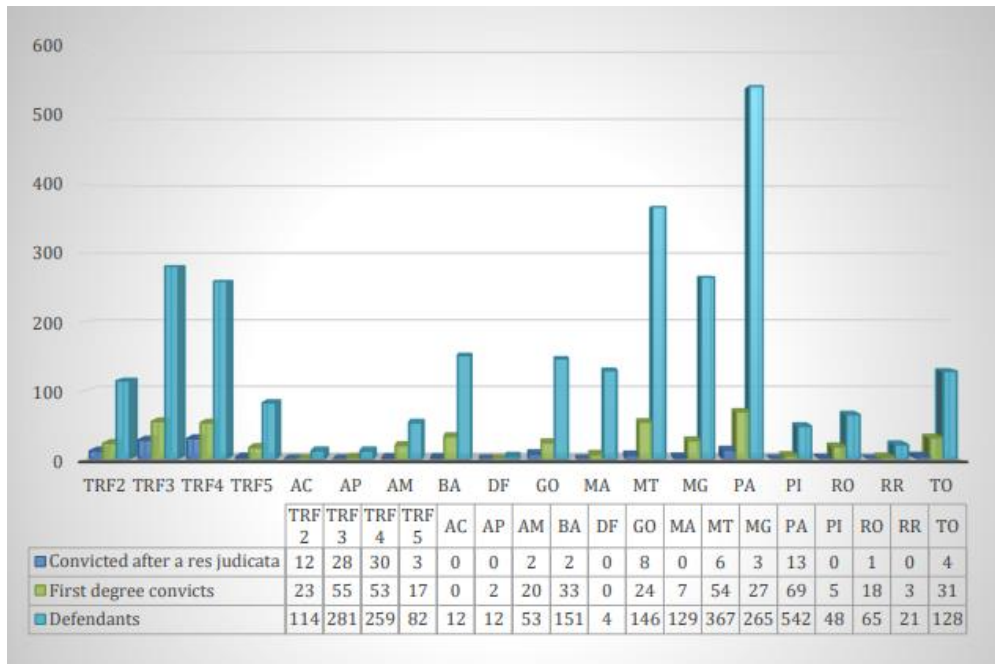
Convictions and *Acquittals:*
 Only 17 individuals were convicted at first instance, and just 3 convictions survived appeals.

Sentencing and *Patterns:*
 Although initial sentences were somewhat more severe (many over 5 years), post-appeal convictions were almost entirely eroded.



Distribution of first degree convictions for the crime of art. 149 by TRF

First Instance Convictions by State:
 States like Pará (69), Mato Grosso (54), and Bahia (33) had higher rates of conviction at first instance. Others, like Acre, DF, and Amapá, had none.



Distribution of convictions in first degree and after exhausted appeals for the crime of art. 149 by TRF

Convictions after Final Judgment:

From the original 441 first-instance convictions, only 112 remained post-appeal. This sharp fall, from 16.4% to just 4.2% of total defendants, visually illustrates the Pyramid of Impunity.

The most salient and measurable evidence of this phenomenon is found in the attrition rates of convictions through successive judicial reviews. An analysis of final sentencing data demonstrates a steep decline in the number of convictions that survive the appellate process:

- TRF1: From 207 initial convictions to only 39 upheld at final instance.
- TRF2: From 23 to 12.
- TRF3: From 55 to 28.
- TRF4: From 53 to 30.
- TRF5: From 17 to merely 3.



These figures indicate that, in several regions, more than 80% of first-instance convictions are overturned, prescribed, or reversed upon appeal. Particularly striking is the case of TRF5, where only 17.6% of convictions were maintained. This pervasive reduction reflects a systemic weakening of criminal accountability and signals profound structural issues within the adjudication of slave labor crimes.

This pattern of reversal and dismissal supports the thesis of structural impunity. Despite the constitutional and legal condemnation of practices analogous to slavery, the empirical likelihood of definitive conviction is consistently below 5% of all reported cases. The practical outcome is that the vast majority of perpetrators avoid criminal responsibility, either through acquittal, prescription, or the collapse of procedural steps in the judicial process.

A primary cause of case attrition lies in the predominance of acquittals grounded in "insufficient evidence." This evidentiary shortfall points to significant fragility in the investigative and prosecutorial phases. In many instances, the burden of proof fails to withstand appellate scrutiny, indicating a need for more robust fact-finding, better documentation practices during inspections, and enhanced forensic capacities in cases of contemporary slavery.

Even in those exceptional cases where convictions are upheld, sentencing tends to be lenient. The modal sentencing pattern is below four years of imprisonment, rendering the majority of punishments eligible for substitution with alternative penalties, such as community service or probation. This leniency undermines the symbolic and deterrent effect of criminal sanctioning and raises concerns about the adequacy of penal responses in proportion to the gravity of the offense.

The disparities in conviction rates across Brazil's federal regions expose an additional layer of inconsistency in the state's judicial response. While TRF1, which encompasses vast areas of the rural North and Center-West, maintains a large number of initial convictions, the survival rate of these convictions is among the



lowest. Conversely, other regions initiate fewer prosecutions but occasionally exhibit higher rates of appellate endurance. Such territorial disparities suggest that justice is not uniformly administered, and that location plays an outsized role in shaping judicial outcomes.

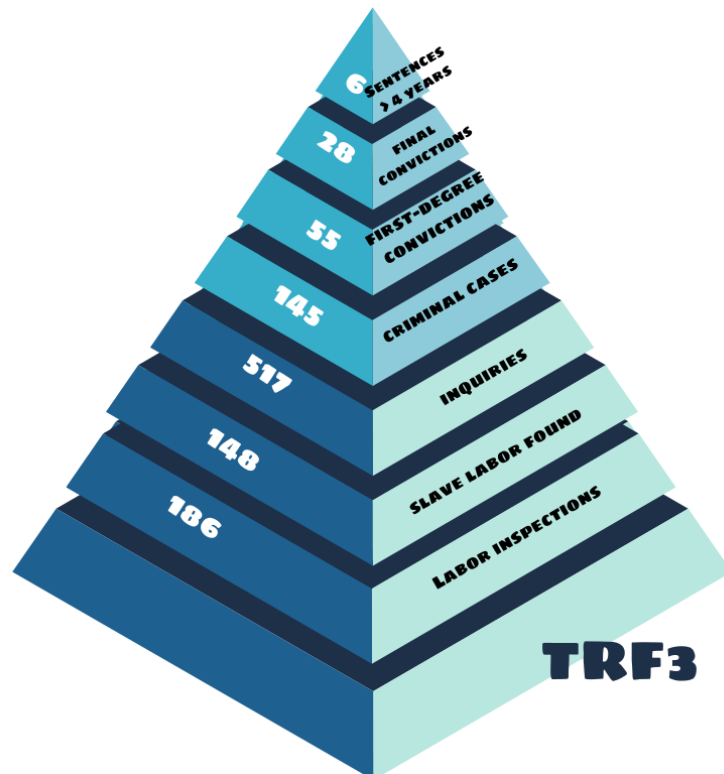
The appellate structure itself emerges as a crucial contributor to impunity. The data demonstrate that most defendants initially convicted are ultimately acquitted or otherwise released due to procedural inefficiencies, such as delays leading to statutes of limitations. These results not only frustrate victims' expectations for justice but also communicate to perpetrators a tolerable risk of punishment, thus reinforcing cycles of exploitation.

The Funnel of Criminal Accountability in Art. 149 Cases

The analysis begins with data on criminal proceedings related to article 149 of the Brazilian Penal Code, which criminalizes the reduction of a person to a condition analogous to slavery. From 2008 to 2019, there were 2,679 individuals accused of this crime. However, only 112 were definitively convicted, resulting in a conviction rate of merely 4.1%. Even more striking, only 27 individuals (1%) received sentences that exceeded four years of imprisonment, the minimum threshold that could preclude alternative sanctions such as community service. This data highlights the fragility of criminal enforcement and signals the structural ineffectiveness of penal repression mechanisms in confronting such a grave violation of human rights.



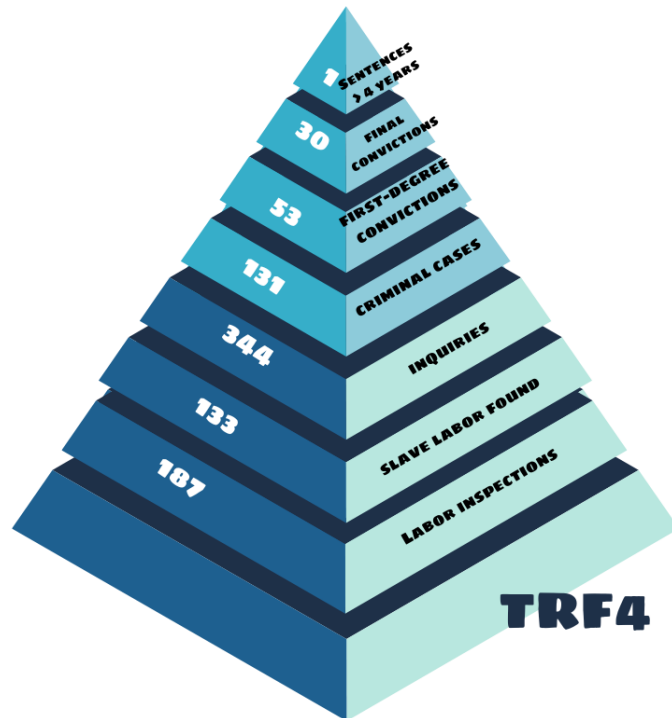
Pyramid of impunity related to the crime of art. 149 in the TRF2 jurisdiction



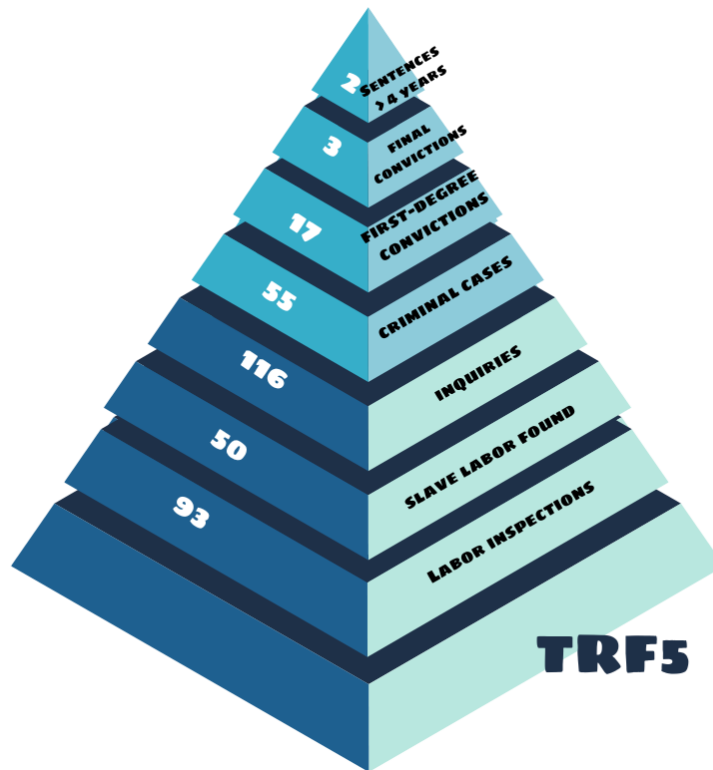
Pyramid of impunity related to the crime of art. 149 in the TRF3 jurisdiction



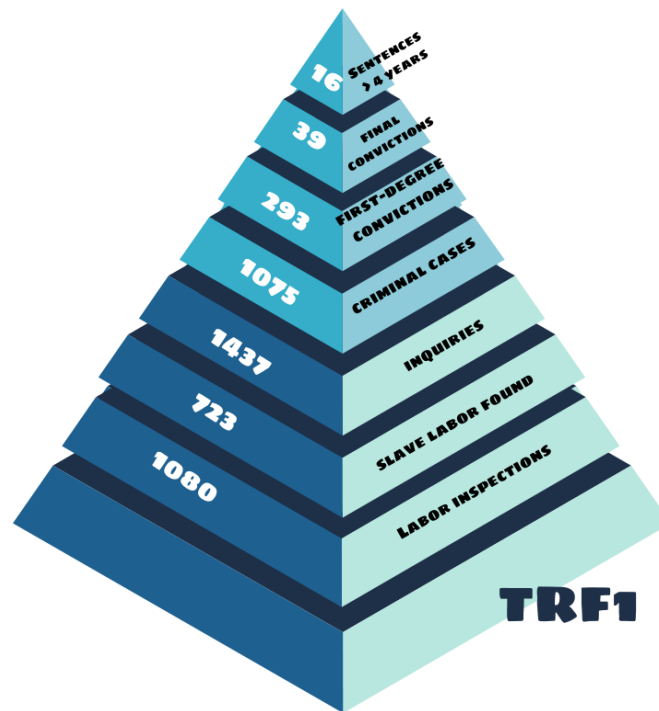
CLÍNICA DE TRABALHO ESCRAVO E TRÁFICO DE PESSOAS DA FACULDADE DE DIREITO DA UFMG



Pyramid of impunity related to the crime of art. 149 in the TRF4 jurisdiction



Pyramid of impunity related to the crime of art. 149 in the TRF5 jurisdiction



Pyramid of impunity related to the crime of art. 149 in the TRF1 jurisdiction

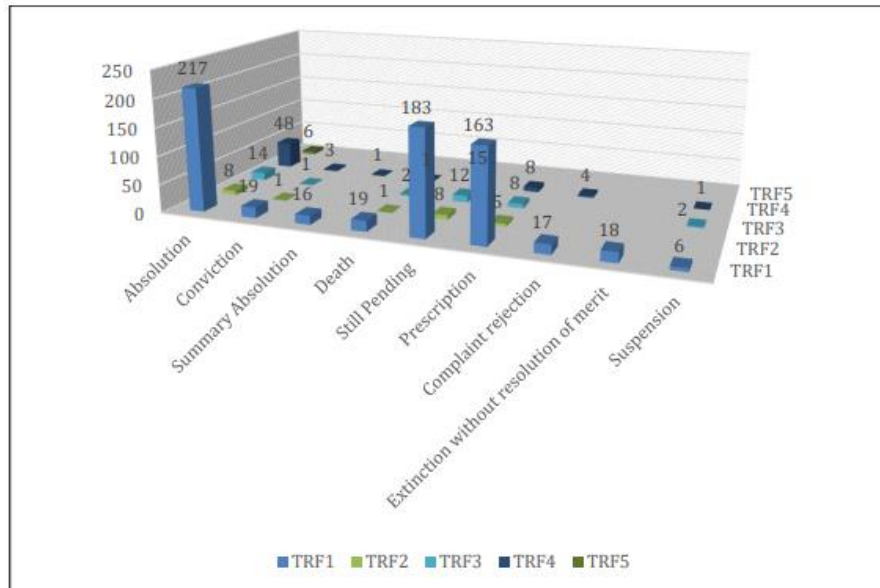
Each Federal Regional Court (TRF) exhibits a similar pyramid structure of attrition, in which the number of cases and individuals drastically diminishes at each stage of the process. For example:

- TRF2: 126 inspections led to 185 inquiries, 58 criminal complaints, 23 first-degree convictions, 12 final convictions, and only 3 sentences exceeding four years.
- TRF1: Of 1080 labor inspections, there were 723 inquiries and 1437 criminal complaints. Despite this, only 39 individuals received first-instance convictions, and a mere 16 were sentenced to over four years in prison.

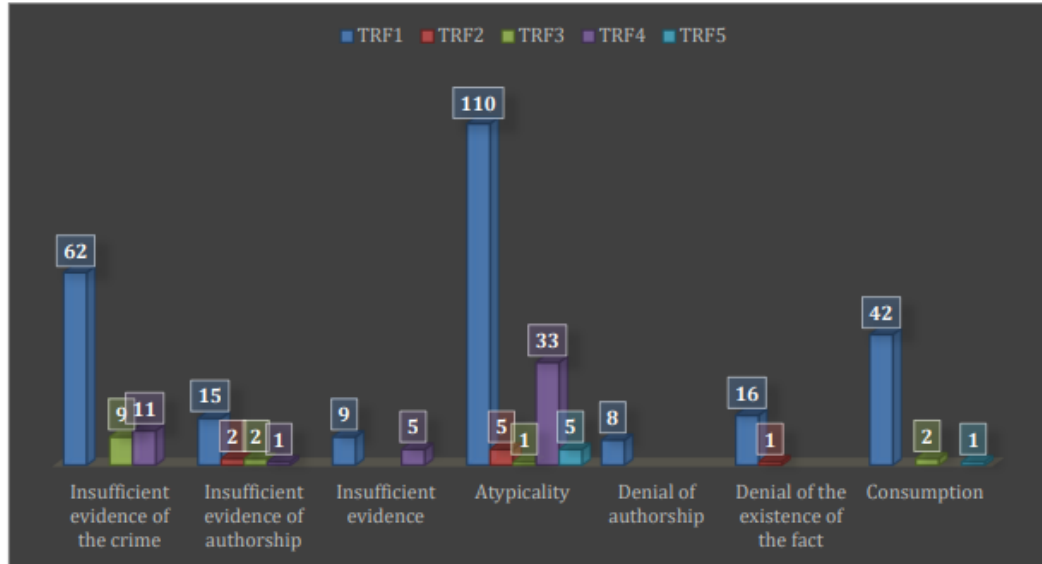
This disparity reveals a judicial filtering system that favors acquittals or procedural dismissals. Acquittals predominantly occurred due to insufficient evidence or atypicality of the alleged crime, with hundreds of cases resulting in no punitive outcome.



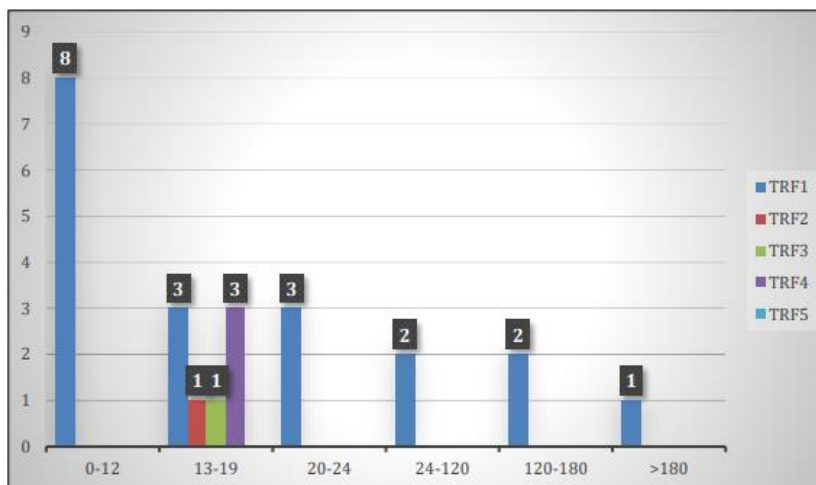
CLÍNICA DE TRABALHO ESCRAVO E TRÁFICO DE PESSOAS DA FACULDADE DE DIREITO DA UFMG



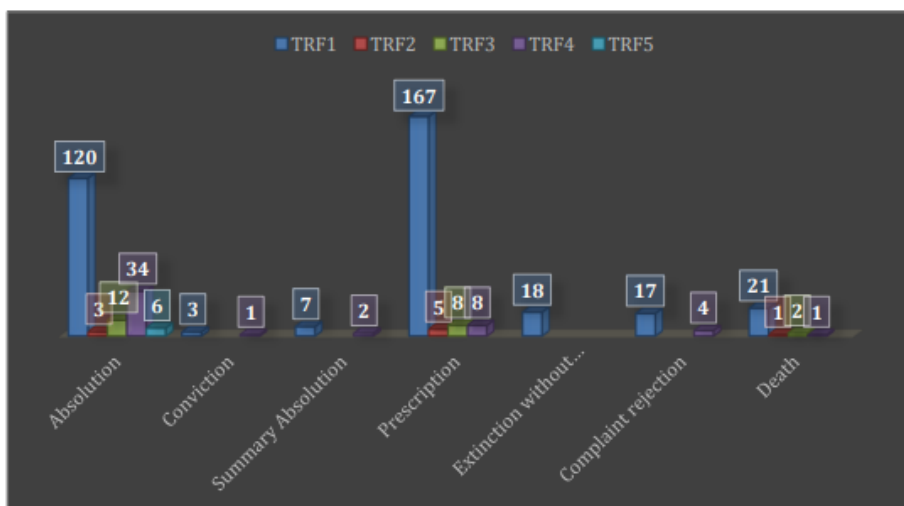
Result of the sentence concerning the crime of art. 203 by TRF



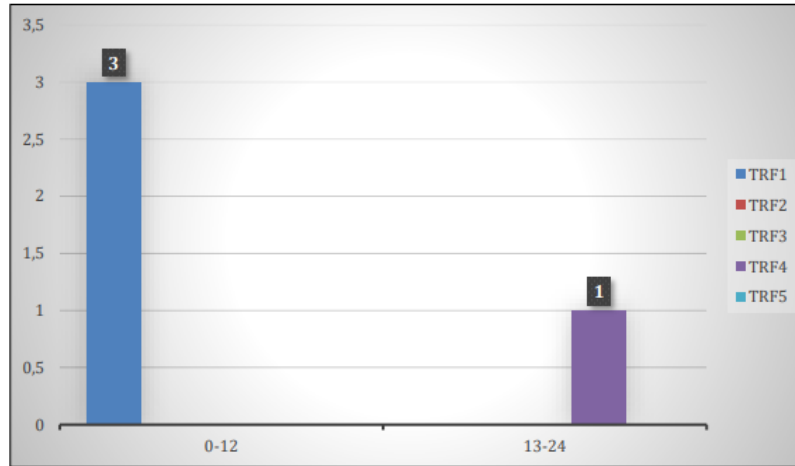
Fundamentals of absolution in relation to the crime of art. 203 by TRF



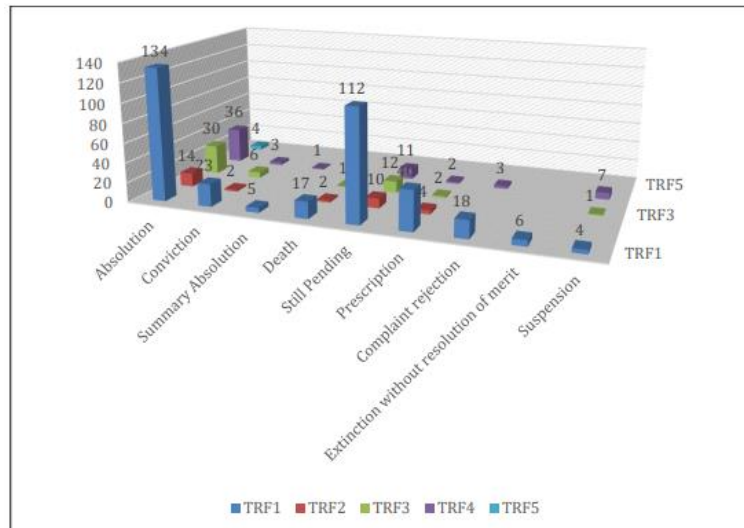
Penalties applied to the crime of art. 203 by TRF



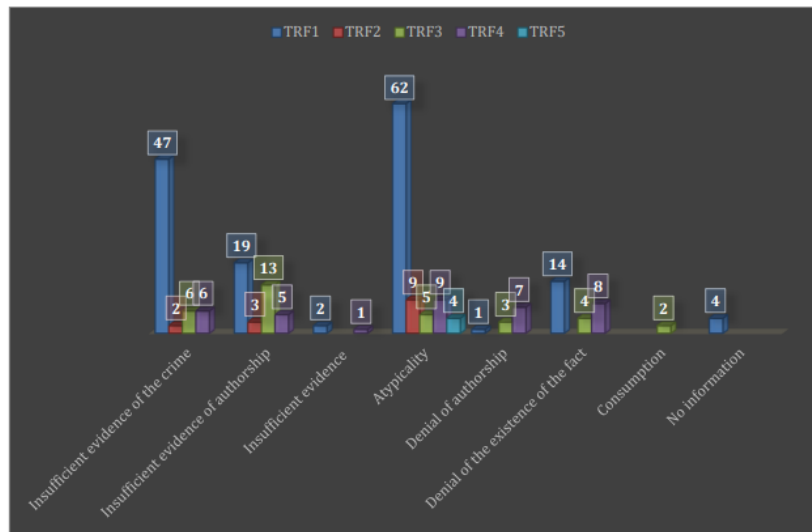
Result unappealable in relation to the crime of art. 203 by TRF



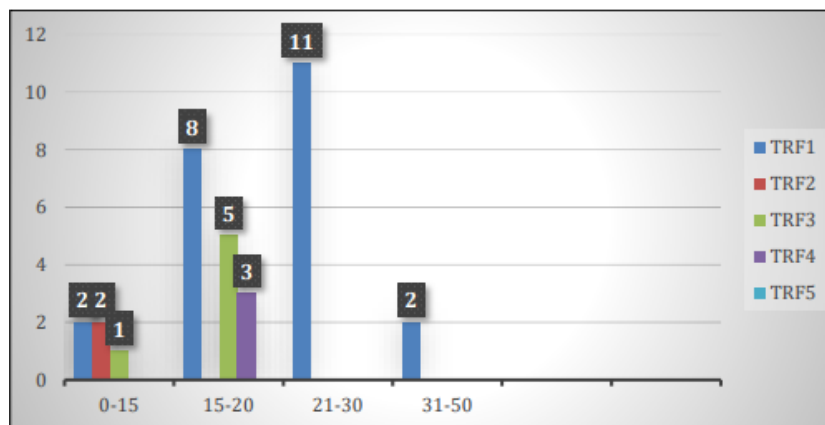
Definitive penalties applied to the crime of art. 203 by TRF



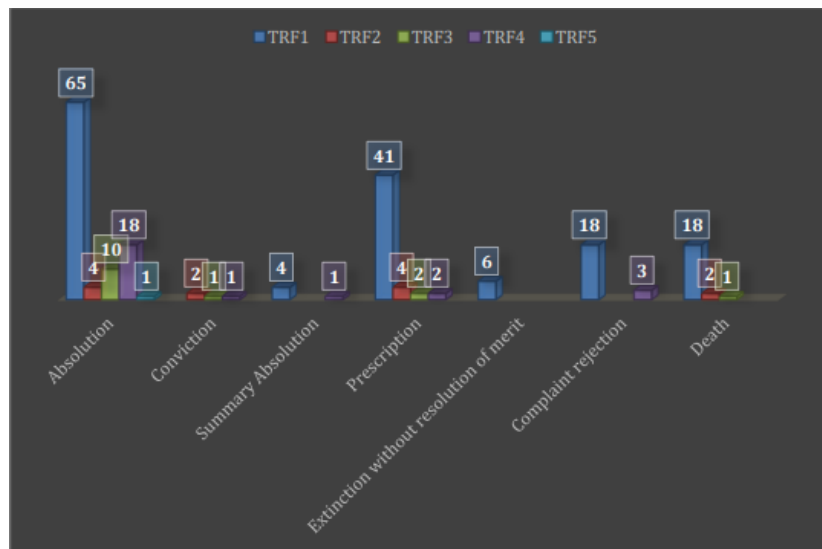
Result of the sentence concerning the crime of art. 207 by TRF



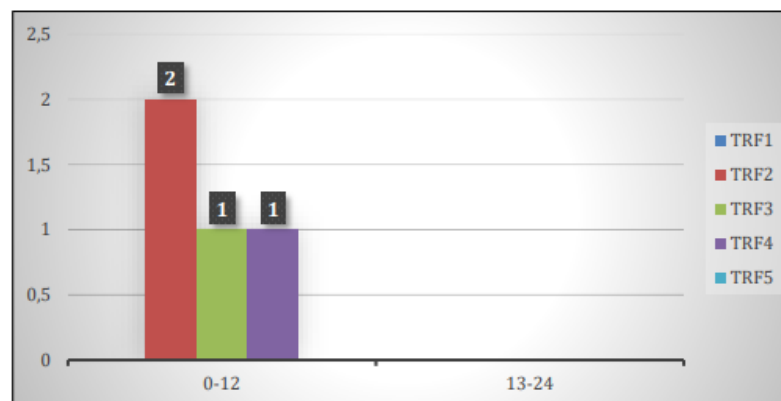
Fundamentals of absolution in relation to the crime of art. 207 by TRF



Penalties applied concerning the crime of art. 207 by TRF



Result unappealable concerning the crime of art. 207 by TRF



Definitive penalties applied concerning the crime of art. 207 by TRF

To expand the analysis, the study examines correlated criminal charges that frequently accompany Article 149 accusations. These include:

- Art. 203 – Frustration of labor rights
- Art. 207 – Illegal recruitment of workers
- Art. 297 §3 and §4 – Falsification of public documents.

A total of 807 defendants were denounced under article 203, with a definitive conviction rate of only 0.4%. Likewise, of the 510 defendants accused under article 207, only four (0.8%) received any form of sentence. Under article 297, involving



document falsification, 12 out of 587 defendants were ultimately convicted, a rate of 2%.

The penalty lengths for these crimes were generally below 30 months, allowing substitution by non-custodial sanctions, such as restrictions on rights. The vast majority of defendants were acquitted or had their cases extinguished by statute of limitations, particularly due to the low maximum penalties provided by law (1–2 years in most of these cases).

The Pyramid of Impunity emerges as a powerful analytical framework. It shows that from a broad base of labor inspections, most fail to generate indictments, and even fewer reach trial or lead to convictions. When they do, the sentences are frequently minimal, outdated, or overturned on appeal. Furthermore, the study reveals a negligible number of active arrest warrants: out of the 112 final convictions under art. 149, only three had active warrants in the national database (BNMP).

This reinforces the notion that impunity is the rule, not the exception, in Brazil's penal system when it comes to combating slave labor. The obstacles are both legal (e.g., reliance on weak evidence standards, limited investigative capacity) and institutional (e.g., delay, underfunding, appeal reversals, limited use of aggravating factors).

The data confirms that criminal law has had a marginal role in effectively repressing contemporary slave labor. The justice system's heavy reliance on evidence beyond reasonable doubt, combined with delays, legal loopholes, and lenient sentences, results in negligible punishment even for severe violations of human dignity.

The visualization of this reality through the pyramids of impunity offers not only an empirical diagnosis but also a call for institutional reform. Without addressing the inefficiencies at every level—from investigation to final adjudication—slave labor will persist as a profitable and low-risk practice for exploiters in Brazil. This analysis advocates for a reconfiguration of enforcement



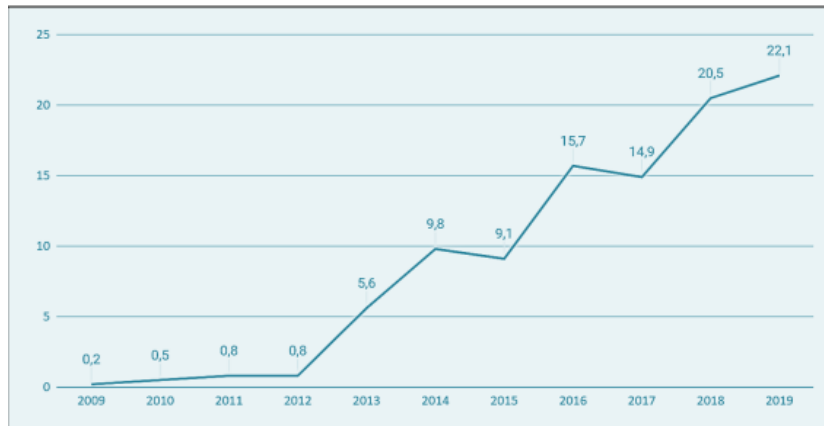
strategies, both to reduce attrition and to reaffirm the moral and constitutional imperative of protecting fundamental labor rights.

The prosecution of contemporary slavery in Brazil reveals a systemic issue of institutional inertia and impunity. Data analyzed from the period of the study underscores the prevalence of lenient sentencing, prolonged procedural timelines, and a judicial culture that fails to fully operationalize the punitive apparatus envisioned by the Penal Code's Article 149.

This article criminalizes the reduction of someone to a condition analogous to slavery and defines such reduction through four primary modalities: forced labor, exhaustive workdays, degrading conditions, and restriction of movement. Yet, the judicial outcomes indicate significant underutilization of key punitive mechanisms.

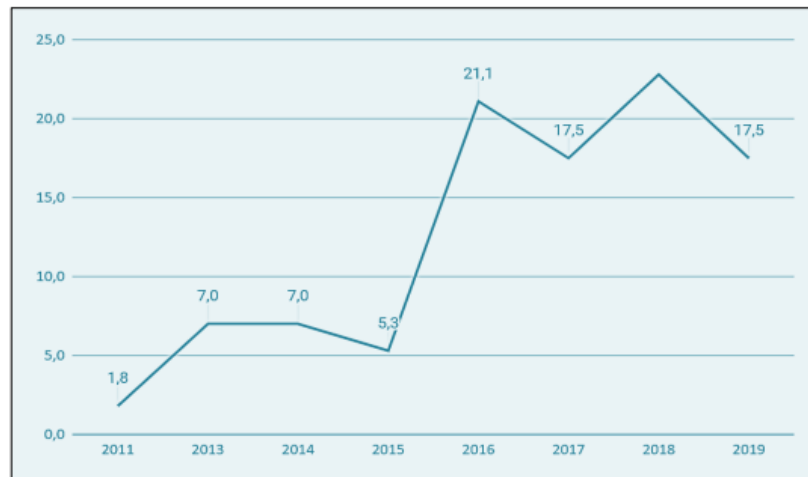
The Pyramid of Impunity is a crucial framework for understanding the attrition of accountability throughout the legal process. The temporal flow of cases—moving from inspection to denunciation, sentence, appeal, and final judgment—reveals an extended timeline at every procedural stage. The average time between the inspection and denunciation is 857 days, with a median of 612 days, and an extreme maximum of 5,032 days (13.78 years).

The period from denunciation to receipt spans an average of 128 days, reaching up to 3,770 days (10.32 years). From the receipt of the complaint to sentencing, the mean duration extends to 1,506 days (approximately 4.1 years), with a maximum of 9,129 days (25 years). These delays severely compromise the principle of timely justice and reflect a system resistant to procedural efficiency.



Distribution of the date of res judicata by year

This graphic shows the clustering of final decisions post-2017, indicating a reactive uptick possibly associated with the 2017 CNJ goal targeting human trafficking, corruption, and slave labor crimes. However, this peak does not signify consistent efficiency, but rather concentrated effort within a limited time frame.

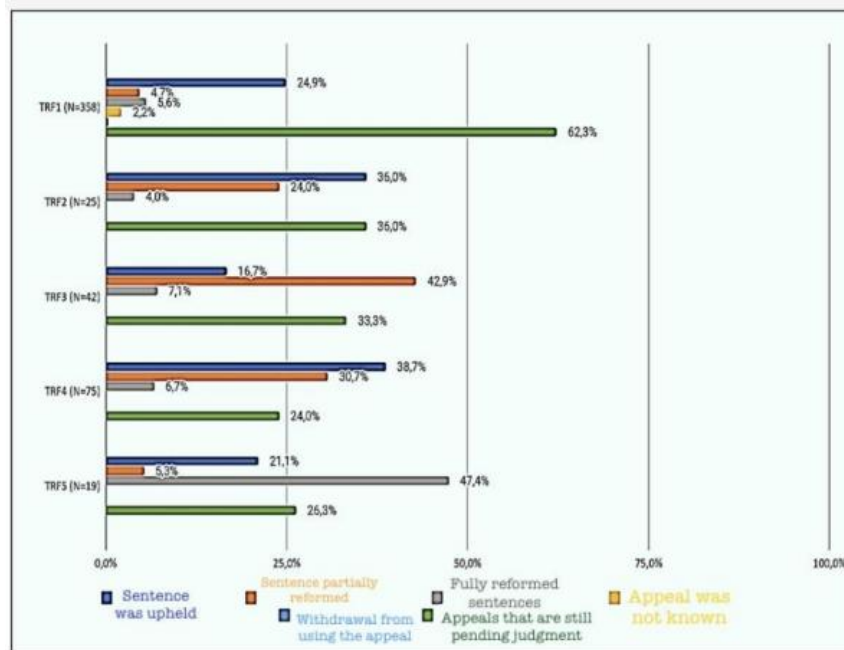


Distribution of the date of commencement of criminal execution by year

Despite the spike in 2018 (22.8% of executions initiated), overall data shows stagnation and delay in the effective enforcement of criminal sentences.

Furthermore, the appeal process contributes significantly to the Pyramid of Impunity. Of the 519 appeals filed, 51.8% remained pending as of December 31, 2019, and only 26.6% were upheld, with 12.5% partially and 7.3% fully reformed.

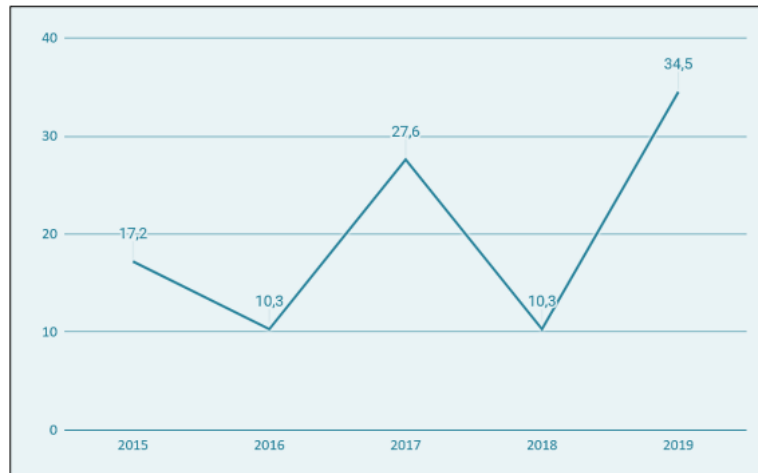
These figures reinforce the finding that the majority of cases remain unresolved at higher judicial levels.



Distribution of cases in the TRFs by main situations of sentence review

This graphic illustrates that TRF1 alone concentrated 82.9% of pending appeals, highlighting regional disparities and reinforcing the Pyramid of Impunity's base—cases stuck in procedural limbo. In contrast, TRF5 has the highest rate of fully reformed sentences (23.7%), suggesting inconsistent jurisprudential standards across regions.

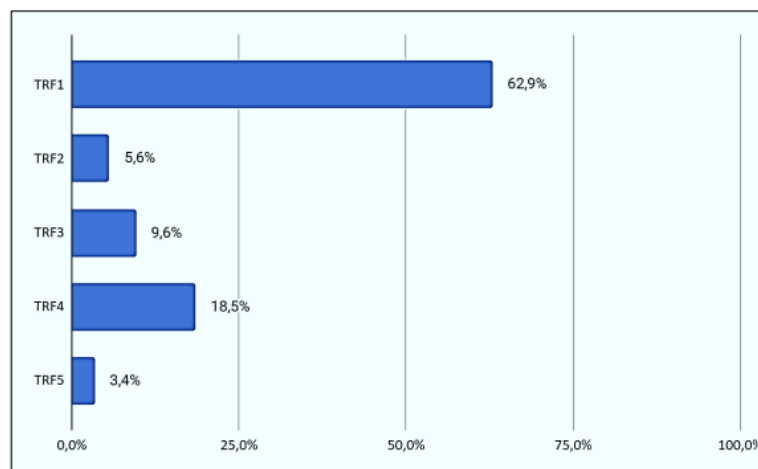
The data also shows minimal progression to the higher courts. Only 12.7% of cases resulted in appeals to the STJ, and a mere 0.3% reached the STF, Brazil's Supreme Federal Court. Such statistics demonstrate that most cases terminate in intermediate courts, rarely advancing to definitive constitutional scrutiny.



Distribution of the date of REsp judgments in the STJ by year

The graphic indicates fluctuating volumes of decisions in the STJ, with no consistent pattern, reinforcing the argument of sporadic rather than systemic judicial attention to these cases.

Sentencing outcomes further illustrate judicial leniency. In 96.3% of cases, a custodial sentence was accompanied by a fine, but in 44.2% of these, imprisonment was substituted with alternative sanctions, such as monetary payments or community service. The most common keywords in the corpus—“pecuniary,” “provision,” “community,” “services”—confirm that non-custodial punishments dominate.



Distribution of sentences replaced by TRF



Frequency of words related to substituted restrictive sentences

These figures reinforce the predominance of economic sanctions or public service provisions, which, while valuable, fail to adequately reflect the severity of human rights violations embedded in slave labor.

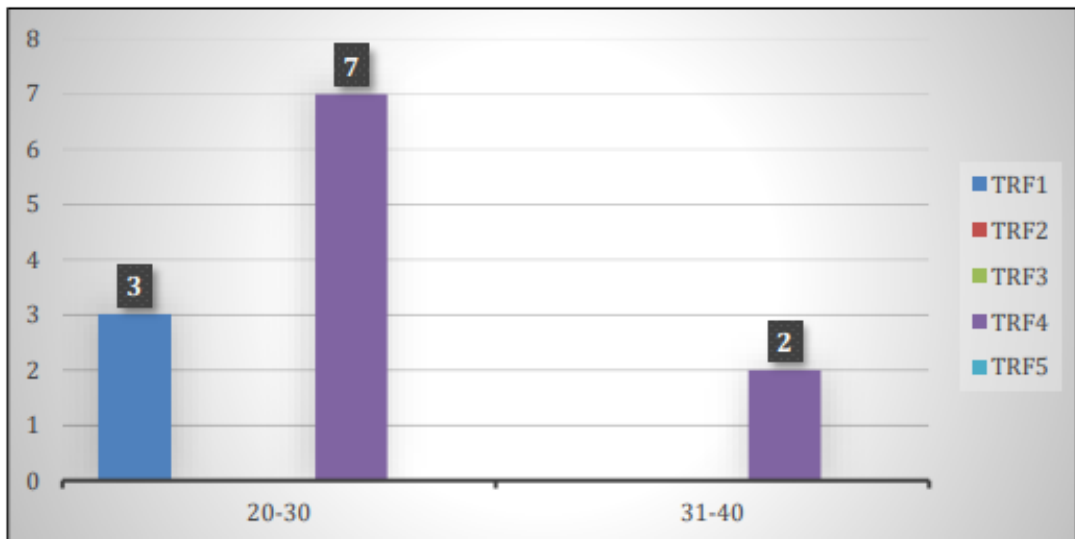
Minimum compensation values are likewise underutilized. Of 680 criminal cases, only 17 established a minimum indemnity, accounting for a mere 2.6%. Even among sentencing decisions, this number rises only to 3.8%. TRF1 is responsible for the majority of compensations, including the lowest national value (R\$ 312.33), while TRF3 issued the highest (R\$ 511,445.67). The national average, however, is R\$ 63,269.48.

	Valid Number	Minimum	Maximum	Average	Sum
TRF1	9	312.33	90,000.00	29,381.95	264,437.53
TRF2	0
TRF3	3	5,000.00	511,445.67	184,148.56	552,445.67
TRF4	0
TRF5	1	5,620.00	5,620.00	5,620.00	5,620.00
Brazil	13	312.33	511,445.67	63,269.48	822,503.20

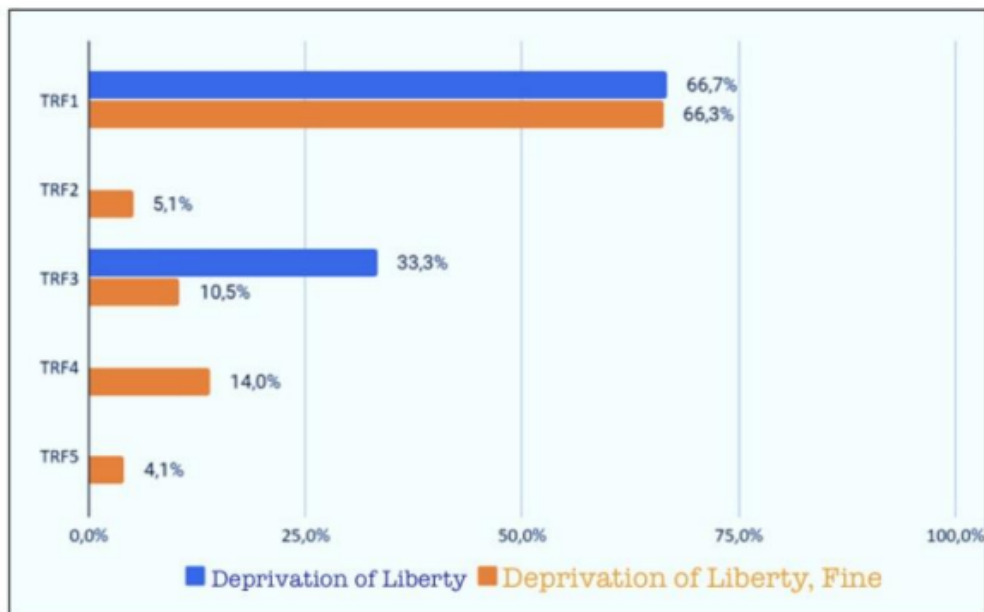
Descriptive statistics of the minimum compensation amount



Such low incidence of indemnification reflects a judicial culture that relegates compensation to civil litigation, undermining the penal system's role in reparation and deterrence.



Definitive penalties are applied concerning the crime of art. 297, §§ 3rd and 4th by TRF



Distribution of penalties applied by TRF

Finally, the protected legal assets associated with Article 149 are inconsistently recognized. Although the terms "dignity" (371 occurrences) and



"freedom" (337 occurrences) dominate, their actual integration into judicial reasoning remains underdeveloped, often overshadowed by procedural formalism.



Frequency of words related to protected legal assets

In conclusion, the Pyramid of Impunity reveals an entrenched judicial bottleneck that erodes the effectiveness of Brazil's legal framework against contemporary slavery. The combination of delayed timelines, minimal convictions, rare compensations, and an overwhelming use of alternative sentences underscores a critical gap between legal norms and their enforcement. This systemic leniency not only perpetuates violations but also undermines the rule of law and the promises of human dignity and labor protection enshrined in the Brazilian Constitution.

Judicial Processing Times and the Pyramid of Impunity in Contemporary Slave Labor Cases in Brazil

The persistence of slave labor in Brazil is deeply intertwined with the inefficiency and slowness of the judicial system. This section of the research provides a comprehensive overview of the procedural chronology of criminal cases related to contemporary slave labor and explores the intricate dynamics that feed into what is known as the Pyramid of Impunity.



The total time from inspection to res judicata exhibits an extraordinary range—spanning 425 to 6,576 days, with an average of 2,664 days and a median of 2,520 days (approximately 7.3 years). Such delay highlights systemic procedural bottlenecks that obstruct effective justice. Notably, the stage between the denunciation and final decision averages 1,814 days (median 1,674), underscoring that even once formal charges are laid, the road to accountability is long and uncertain.

	Valid Number	Minimum	Maximum	Average	Median
Inspection - Denunciation	1109	3	5032	857	612
Denunciation - Receipt of the complaint	1385	0	3770	128	43
Receipt of the complaint - Sentence JF	957	34	9129	1506	1373
Sentence JF - Appeal in the TRF	479	8	3052	245	166
Appeal in the TRF - Judgment TRF	240	10	2783	659	473
Judgment in the TRF - Special appeal in the STJ	40	67	687	260	241
Special appeal in the STJ - Judgment in the STJ	28	7	3408	282	73
Judgment in the STJ - Extraordinary appeal in the STF	4	45	968	303	99
Extraordinary appeal in the STF - Judgment in the STF	4	6	154	52	25
Denunciation - Res judicata	582	3	5979	1814	1674
Inspection - Res judicata	482	425	6576	2664	2520

Summary of time elapsed in days between steps in criminal proceedings

When analyzing specific procedural stages, the data reflect consistent delays:

- From receipt of complaint to sentencing at first instance (JF): average 1,506 days.
- From first-instance sentence to appeal at the TRF: 245 days.
- From TRF decision to the filing of a special appeal at the STJ: 260 days.
- From STJ judgment to assessment of extraordinary appeal in STF: 303 days.



- From STF assessment to final ruling: an average of 52 days.

The accumulated effect of such segmented delays contributes directly to impunity and weakens the dissuasive power of judicial sanctioning.

Rural vs. Urban Judicial Dynamics

The dataset offers a compelling comparison between rural and urban contexts. Criminal cases involving rural slave labor take an average of 1,820.19 days, compared to 1,302.80 days in urban scenarios—revealing a significant difference of 517.39 days. In contrast, labor claims show a minor difference: 476.93 days for rural cases and 524.70 for urban, with the latter taking slightly longer.

Criminal cases					
Activities	N	Average (days)	Pattern	Min	Max
Rural	712	1,820.19	926.96	92	5,626
Urban	85	1,302.80	657.87	111	3,033

Duration of criminal cases by economic sector (urban and rural)

Labor claims					
Activities	N	Average (days)	Pattern	Min	Max
Rural	160	476.93	534.63	15	3,506
Urban	61	524.70	427.86	27	2,153

Duration of labor claims by economic sector (urban and rural)

This discrepancy underscores the higher complexity of rural investigations, where geographical isolation, low visibility, and limited infrastructure inhibit the prompt gathering of evidence and witness testimonies.

Number of Rescued Workers and Duration of Proceedings



A crucial variable associated with procedural delay is the number of workers rescued. In criminal cases:

- Cases with 1–4 workers: average 1,624.98 days.
- Cases with 19+ workers: average 2,088.03 days.

Each additional worker rescued is linked to an increase of 1.97 days in case duration, controlling for sector. This correlation suggests that larger operations, typically involving more exploitative practices and broader networks, require more time for investigation and legal proceedings.

Processing time for labor claims					
Rescued workers	N	Average (days)	Pattern	Min	Max
0-6	38	394.42	366.25	15	1,736
7-13	39	502.87	412.94	27	1,610
14-31	43	560.44	649.88	19	3,506
32+	35	558.06	589.30	48	3,171
Processing time for criminal claims					
Rescued workers	N	Average (days)	Pattern	Min	Max
1-4	149	1,624.98	837.59	130	4,244
5-8	151	1,693.68	851.00	92	4,810
9-18	191	1,779.91	853.98	333	4,417
19+	180	2,088.03	990.29	133	5,626

Relation between the numbers of workers rescued and the duration of the proceedings

Regression in the duration of criminal proceedings by economic sector, controlled by the number of workers rescued						
Processing time for criminal claims	Coeff.	SE	t	P>t	Conf.	Interval
Rural areas	530.28	126.52	4.19	0.00	281.84	778.72
Workers rescued	1.97	0.57	3.44	0.00	0.84	3.09

Regression of the duration of criminal cases by economic sector, controlled by the number of workers rescued



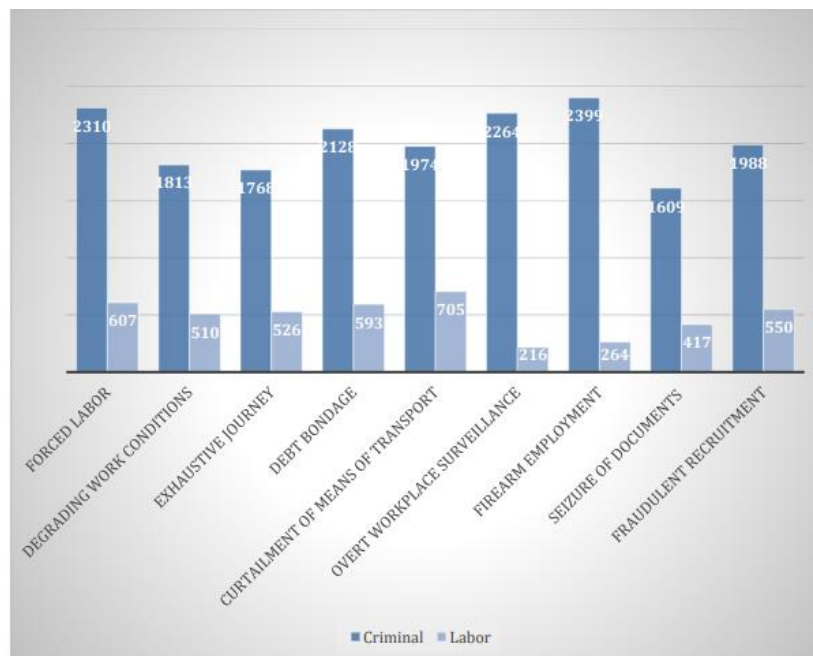
For labor actions, each additional worker adds 5.1 days, albeit the economic sector (urban or rural) does not significantly affect duration here.

Types of Exploitation and Their Impact on Processing Time

Different forms of exploitation manifest in varying judicial processing times:

- Debt bondage: 2,127.77 days.
- Use of firearms: 2,399.25 days.
- Overt surveillance: 2,264.29 days.
- Forced labor: 2,309.54 days.
- Degrading conditions: 1,813.17 days.

Each of these categories presents unique challenges for investigation and prosecution, particularly forced labor and firearms, which lead to average increases of 422.23 and 510.8 days, respectively.



Duration of the process in days according to the type of slave labor



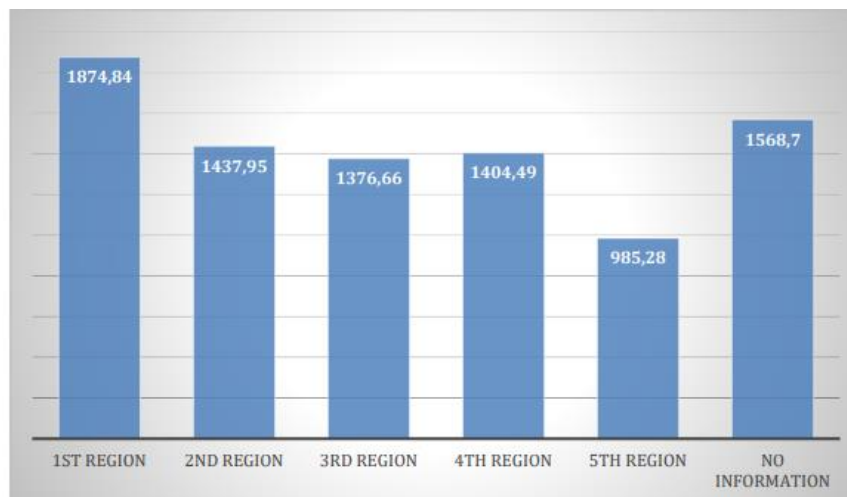
This data reinforces the hypothesis that more violent or covert forms of coercion—such as the use of weapons, surveillance, or forced isolation—are more procedurally complex and slower to adjudicate.

The analysis identifies significant regional disparities in judicial performance across the five TRFs (Federal Regional Courts):

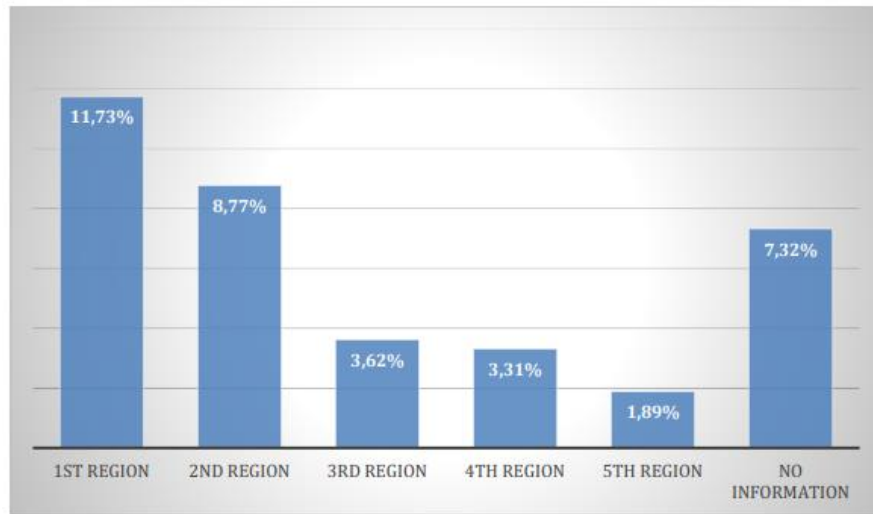
- TRF1: Slowest, averaging 1,874.84 days.
- TRF5: Fastest, with 985.28 days.

This variation correlates with prescription incidence:

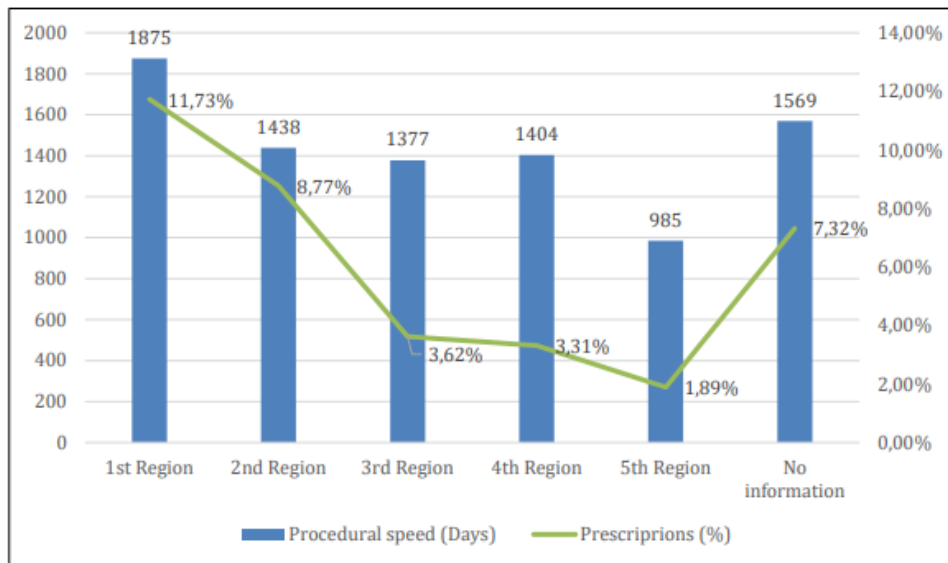
- TRF1: Highest rate of 11.73% of cases expiring due to prescription.
- TRF5: Lowest, at 1.89%.



Duration of criminal cases in days per TRF



Percentage of incidence of prescription by TRF



Comparison of procedural speed versus incidence of prescription

These statistics are critical to the Pyramid of Impunity: the slowest courts enable greater impunity by facilitating prescription before final judgment. Thus, territorial disparities in court performance are not only administrative but also profoundly structural obstacles to justice.

Detention and Procedural Speed

The data complicate the assumption that custody accelerates proceedings:

- Arrest in the act: 1,569.71 days.



- Defendants at liberty: 1,705.80 days.
- Preventive detention: longest, with 1,917.14 days

Only temporary detention significantly reduces duration (409.50 days), suggesting pretrial detention does not consistently drive faster justice and may reflect systemic dysfunction rather than procedural efficiency.

Appeals and Strategic Litigation

A final dimension of delay relates to appeals. Criminal appeals to TRFs occur in 34.49% of cases; however, only 8.71% reach the STJ. In labor cases, 32.18% are appealed at TRT level, but 46.76% reach the TST. The low appeal rate to the STJ may indicate that the MPF (Federal Prosecutor's Office) lacks strategic commitment to pushing these cases to higher courts, contrary to the MPT's behavior in labor matters.

This variation underscores differing institutional cultures between prosecutors, and perhaps unequal prioritization of criminal accountability in slave labor cases.

Conclusion: The Pyramid of Impunity Materialized

The evidence presented in this study confirms the empirical reality of the so-called Pyramid of Impunity in Brazil's judicial handling of contemporary slave labor cases. Although Article 149 of the Penal Code establishes a clear legal basis for criminal accountability, the enforcement of this provision is severely compromised. Conviction rates drop sharply at each successive procedural stage, with the majority of initial condemnations reversed or extinguished on appeal. This systematic attrition reflects a judicial structure that fails to deliver meaningful consequences for those who subject others to conditions analogous to slavery.

At the base of this pyramid lies the prevalence of acquittals, often justified by courts due to "insufficient evidence," a finding that suggests investigatory and prosecutorial limitations. When convictions do occur, sentences tend to be short, frequently under four years, and thus eligible for substitution. These lenient outcomes, compounded by extended timelines, fail to provide adequate deterrence.



Particularly in TRF1, which covers vast rural regions where many of the most serious cases arise, procedural delays routinely result in statute of limitation dismissals, further weakening accountability.

The geographic disparities and the relatively low number of cases reaching superior courts underscore a fragmented and inconsistent judicial response. More complex cases—those involving violent coercion, multiple victims, or fraudulent recruitment—suffer most from slow adjudication. Victims in these regions often experience secondary victimization due to the sluggish pace of justice and the low probability of resolution, contributing to the persistence of exploitative labor regimes.

Taken together, these findings reveal that impunity is not incidental but systemic, enabled by procedural inertia, regional inequality, and normative leniency. The current structure does not reflect the gravity of the crime it is meant to address. Addressing this gap requires more than isolated reforms—it demands comprehensive restructuring of judicial priorities, better coordination among institutions, and stronger investigatory frameworks. Only then can Brazil move from formal prohibition to effective eradication of contemporary forms of slavery.



Overview of domestic contemporary slavery in Brazil

The International Labor Organization (ILO) estimates that there are 67 million domestic workers in the world, 80% of whom are women¹⁴. In other words, this is an extensive and relevant demographic contingent, but one that has been little studied¹⁵. Specifically in the Brazilian context, according to the IBGE, 92% of the country's 6.158 million domestic workers are women. However, the precariousness of the area is such that only 33% contribute to social security and 24% have a duly signed work permit¹⁶.

The inferiorization of this type of work is associated with race and social class, since, as this research concludes, the majority of domestic workers are black and brown, and come from low-income communities with little or no schooling. These characteristics are treated as inferior, in view of Brazil's colonial and slave-

¹⁴ ILO. Decent Work for Domestic Workers. 2021. Disponível em: <https://www.ilo.org/meetings-and-events/decent-work-domestic-workers>. Acesso em: 12 jun. 2025.

¹⁵ PEREIRA, Marcela Rage. A invisibilidade do trabalho escravo doméstico e o afeto como fator de perpetuação. Belo Horizonte: Editora Dialética, 2021, p. 17. Disponível em: <https://repositorio.ufmg.br/handle/1843/38505>. Acesso em: 12 jun. 2025.

¹⁶ IBGE. Número de trabalhadoras domésticas caiu em 10 anos. 2023. Disponível em: <https://agenciabrasil.ebc.com.br/geral/noticia/2023-04/ibge-numero-de-empregadas-domesticas-caiu-em-dez-anos>. Acesso em: 12 jun. 2025.



owning past¹⁷, a phenomenon that became evident during the debate and approval of Proposed Amendment to the Constitution No. 72 (the so-called Domestic Workers' Proposal of Amendment) in 2013.

To support the positions against the PEC, arguments associated domestic services with the sphere of family intimacy and not with the sphere of work, distancing the real debate from the labor rights denied to the category for decades.

Culturally, the role of affection in domestic employment relationships is an important mechanism for justifying exploitation in the context of slave-like labor. Marcela Rage Pereira points out that affection functions as a perpetuating element of fear, social exclusion and silencing of victims, since this violation of rights is naturalized in the family sphere¹⁸.

In addition, a kind of debt of gratitude is established between domestic workers and their employers, given that the victims are often already in extremely vulnerable situations when the relationship begins, given the precarious socio-economic context and lack of prospects. In other words, exploitation is normalized when characterized as the only viable option for the worker, resulting in the submission and exclusion of the employee, whose other social ties are atrophied or even completely curtailed¹⁹.

This is why domestic slave labor has distinct characteristics from other forms of contemporary slave labor. As it takes place in a private and family environment, it assumes its own logic of subalternization linked, in most cases, to gender and race.

¹⁷ CRUZ, Mariane dos Reis. *Trabalhadoras domésticas brasileiras: entre continuidades coloniais e resistências*. Orientadora: Dra. Maria Fernanda Salcedo Repolês. 2016. Dissertação. (Mestrado em Direito). Universidade Federal de Minas Gerais. Belo Horizonte, UFMG, 2016, p. 97. Disponível em: <https://repositorio.ufmg.br/handle/1843/BUBD-AYRNHH>. Acesso em: 12 jun. 2025.

¹⁸ PEREIRA, Marcela Rage. *A invisibilidade do trabalho escravo doméstico e o afeto como fator de perpetuação*. Belo Horizonte: Editora Dialética, 2021, p. 18. Disponível em: <https://repositorio.ufmg.br/handle/1843/38505>. Acesso em: 12 jun. 2025.

¹⁹ Idem.



However, because it takes place in the home, it adds another layer of secrecy, given the inviolability of the home as a fundamental right (art. 5, item XI, CF/88). Even so, in recent years there has been growing media interest in the stories of victims of domestic slave labor in Brazil.

Emblematic cases, such as the rescue of worker Madalena Gordiano in Patos de Minas, Minas Gerais²⁰, have mobilized national debates on contemporary slavery, highlighting the situation of vulnerability to which domestic workers are subjected. Thus, according to the National Union of Labor Inspectors (SINAIT), complaints related to domestic work have increased due to the repercussions of Madalena's case²¹.

Another attraction of social interest was the famous podcast “A mulher da casa abandonada” (2022), by journalist Chico Felitti. From the point of view of investigative journalism, it tells the story of the fugitive Margarida Bonetti, a Brazilian convicted in the United States of subjecting a domestic worker to slave-like conditions. The podcast was successful and had repercussions on social networks, and even dedicated one of the episodes to dealing with the problem of slave labor, with contributions from specialists such as labor prosecutors and academic researchers.

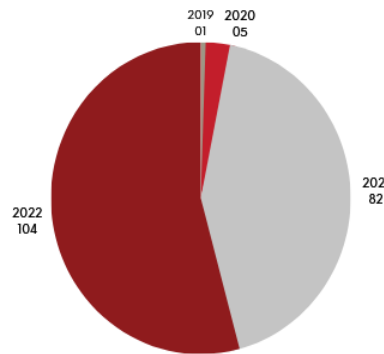
There is therefore a scarcity of data on a common but historically invisible form of exploitation. In this respect, the current media and social movement to intensify the debate on domestic slave labour can be used as an instrument to

²⁰ G1. Madalena Gordiano: família que escravizou mulher por 40 anos é condenada a mais de 14 anos de prisão em MG. 2024. Disponível em: <https://g1.globo.com/mg/triangulo-mineiro/noticia/2024/04/17/madalena-gordiano-familia-que-a-manteve-em-situacao-analoga-a-escravidao-e-condenada-a-mais-de-14-anos-de-prisao-em-mg.ghtml>. Acesso em: 12 jun. 2025.

²¹ SINAIT. Na mídia - Caso de resgate de trabalhadora doméstica escravizada por 38 anos em MG tem desdobramentos. 2021. Disponível em: <https://www.sinait.org.br/noticia/18590/na-midiacaso-de-resgate-de-trabalhadora-domestica-escravizada-por-38-anos-em-mg-tem-desdobramentos>. Acesso em: 12 jun. 2025.



mobilize awareness among the population, since it favours reporting through tools such as Dial 100 and the Ipê System. The following graph show this increase:



Number of reports of domestic slavery in the Ipê System by year (from 2019 to 2022)

In order to strengthen this scenario of greater discussion on the subject and to provide statistical data, the Slave Labor and Human Trafficking Clinic conducted a national study that focuses on domestic slave labor in Brazil, called “What do Brazil's Big Houses hide in the 21st century? A diagnosis of contemporary slave labor in the domestic sphere”.

Unveiling domestic slavery: methods used in the investigation.

Infraction notices related to domestic slave labor from 2017 to 2023 across Brazil were analyzed. This timeframe was chosen considering the beginning of inspections in this category in 2017 and the completion date of this study in March 2024. The data enabled the analysis of various aspects such as victim profiles (age, gender, race, duration under slave conditions), employer profiles, and the social, geographic, and economic contexts of the crimes. Social reintegration prospects for rescued individuals are also assessed.

The research also set out to verify any criminal consequences of the cases reported in the inspection reports, with the aim of studying how the criminal justice system has dealt with this crime, especially with regard to understanding the parameters adopted to verify the typicality of the conduct and the penalties applied.



Research results: the empirical findings concerning labor law.

According to Article 149 of the Brazilian Penal Code, conditions analogous to slavery constitute a crime punishable by two to eight years of imprisonment and a fine. However, the comparative analysis of inspection reports and their criminal ramifications revealed troubling impunity. Once again, the historically marginalized victim profile is ignored by the Judiciary, suggesting state complicity through inaction.

The recognition and enforcement of domestic workers' rights in Brazil has been remarkably slow, despite formal legislative advances. It was only in 2013, with Constitutional Amendment No. 72, that domestic workers gained parity with other urban and rural workers, including the right to overtime pay. Historically, even formal employment failed to secure meaningful protections for this category.

Criminally, there is a significant gap between confirmed cases and judicial consequences, reducing penal law to a political formality. Domestic slave labor remains largely hidden due to its very nature - occurring within private homes - and the victims' vulnerability, often including illiteracy and psychological dependence on employers.

Between 2017 and 2023, 86 confirmed cases of domestic slave labor were identified, but only 20 resulted in charges. Of these, one case is sealed; nine are still under investigation; three await sentencing; one is suspended due to mental health evaluation; three await appellate decisions; and three have been finalized (one partial conviction under fraud, one due to death of the accused, and one acquittal). Notably, no defendant has received a final conviction under Article 149. Only two individuals were convicted in the first instance, receiving minimal penalties that were converted to community service and fines.

Of the 20 defendants, 70% were women. The analysis revealed a significant predominance of female perpetrators in these lawsuits. This disproportionate



gender distribution is largely due to the sexual division of labor, which assigns domestic work and care work to women. This form of division of labour is historically and socially characterized by the priority assignment of men to the productive sphere, which is also endowed with greater social, moral and economic value, and women to the reproductive and private sphere, which is considered naturally feminine and, obviously, less important²².

Moving on to the profile of the victims, it is important to note that the first rescue of a domestic worker from conditions of contemporary slavery took place by the Special Mobile Inspection Group (GEFM), in 2017, in Minas Gerais. In a study carried out by UFMG's Clinic, only one case of domestic slave labor was found among the 373 inspection notices analyzed from 2003 to 2017 in the state of Minas Gerais.

This was a 68-year-old woman working for a lady in a large farmhouse in the interior of the state, where, in addition to the degrading conditions and submission to exhausting hours of domestic work, there was also the usurpation of social security benefits through a system of debt bondage implemented by the lady²³.

That research concluded that the cause of the low percentage of domestic slavery was probably not the rarity of its occurrence, but rather its invisibility²⁴. This is because, as it took place inside large houses, it was almost impossible to discover the slave quarters. In addition to the practically physical barrier, there is also a “high degree of cultural acceptance of these practices, which contribute to preserving them”.

In this study, of the 92 people rescued, 79% were women, 78.3% were black or brown (with reports of racism in 14.4%), 40% were illiterate, 80% were over 60

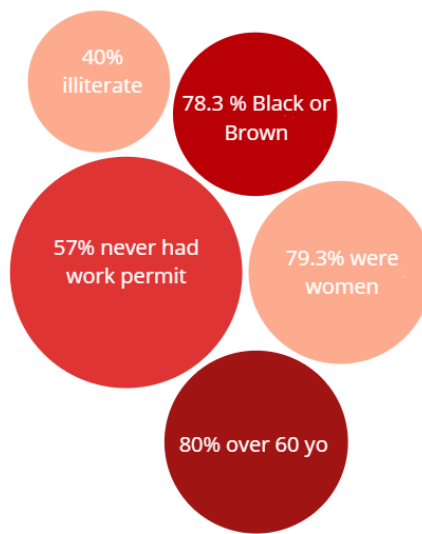
²² HIRATA, Helena; KERGOAT, Danièle. Divisão sexual do trabalho profissional e doméstico: Brasil, França, Japão. In: COSTA, Albertina de Oliveira. SORJ, Bila. BRUSCHINI, Cristina. HIRATA, Helena (orgs). Mercado de Trabalho e Gênero: comparações internacionais. Rio de Janeiro: FGV, 2008. p. 263- 266.

²³ HADDAD, Carlos Henrique Borlido; MIRAGLIA, Lívia Mendes Moreira. (organizadores). Trabalho escravo: entre os achados da fiscalização e as respostas judiciais. Tribo da Ilha: Florianópolis, 2018.

²⁴ Idem, Ibidem.

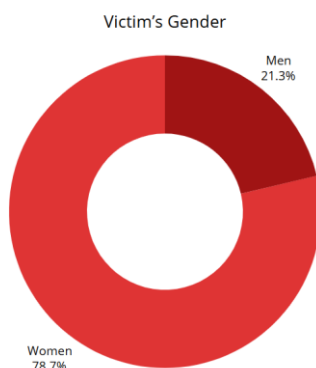


at the time of rescue, and the average duration of submission to conditions analogous to slavery was 26 years. In 57.7% of the cases, the rescued person had never had a work permit. In none of the cases was the rescued person formally adopted, although in almost all of them the defense thesis was raised that “she was almost family”. The statistics found are detailed in the following topics.



a) Gender

Gender is the most distinct demographic marker in domestic slave labor. Of 92 rescued individuals, 78.72% were women. Of the 118 cases analyzed, gender was explicitly stated in 57 (48 women, 13 men). In 33 others, it was inferred (26 women, 7 men). In total: 74 women (78.72%) and 20 men (21.27%).

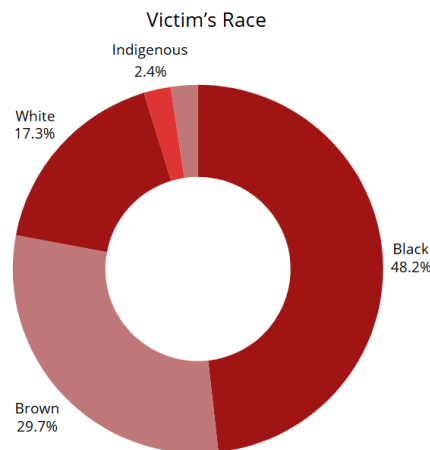




b) Race

In 66.7% of cases (60 individuals), racial identity was not self-declared. Of the 30 who did self-identify: 16 were black, 5 brown, 6 white, 1 indigenous, 1 asian, and 1 bolivarian. Among those whose race was inferred from records: 23 were black, 19 brown, 8 white, 1 indigenous, and 1 asian. Overall: 47.5% black, 29.26%, brown, 17.07%, white, 2.32%, indigenous, 2.32%, asian, and 1.21% bolivarian — meaning 78.3% were black or brown.

One striking case involved a woman in Bahia who expressed fear of touching a white reporter's hand, saying it felt wrong to place her Black hand on a white one. Her testimony included repeated racial abuse and being called a "born slave."

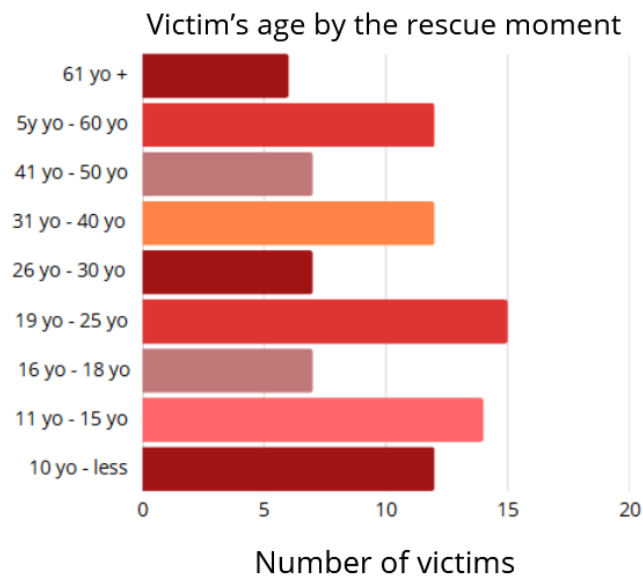


c) Age

The age data of victims rescued from domestic slavery in Brazil reveal a disturbing pattern of lifelong exploitation. Among the 92 cases analyzed, the average age at the time of rescue was 61.2 years, with more than 80% of the victims being over 50 years old, and 36.9% over the age of 70. These figures reflect not only the invisibility and normalization of domestic servitude over time, but also the profound difficulty of interrupting exploitative relationships that often begin in early life.



The duration of exploitation was equally alarming. In 77 of the 92 cases (83.7%), it was possible to estimate the number of years worked under slave-like conditions. The average period of exploitation was 26.6 years, with some individuals enduring over 40 years of uninterrupted domestic servitude. Furthermore, at least 29% of the victims began working before the age of 15, indicating the presence of child labor that evolved into decades of unpaid and coercive domestic work.

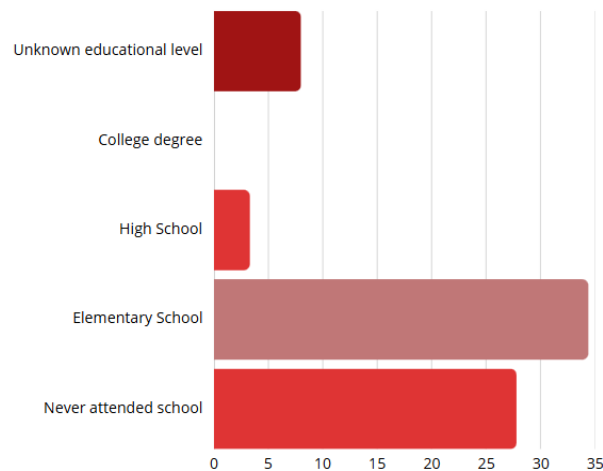


These data confirm that domestic slavery in Brazil is not a temporary or isolated phenomenon: it is often a lifelong condition, embedded in social and racial hierarchies, and obscured by emotional manipulation and the rhetoric of care or fictive kinship. Victims are typically taken in as children or teenagers and subjected to decades of unpaid labor, often without access to education, formal documentation, or state protection.

d) Literacy and Education



40% of victims were illiterate; 27.8% never attended school; 34.4% only completed elementary education; and just 3.3% attended high school. No one had a college degree. In 34.4% of cases, education level was unknown, suggesting actual illiteracy rates may be higher. One woman, having only completed second grade, was denied further schooling by her employers, who claimed it was unsafe for a “young lady.”



e) State Benefits

Of the workers, 43.7% received some government benefit, but in 16 of those cases (the majority), employers retained them. Most workers lacked financial autonomy, basic education, and even personal bank accounts.

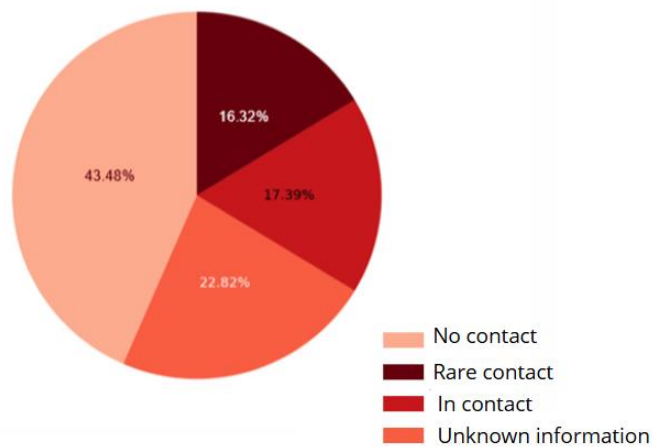
Employers employed deceit, even withholding documents, and paternalism, convincing workers they were unfit to manage finances. For example, one woman was coerced into marrying her employer’s uncle so his pension could be inherited and controlled by the family.

Another had her ID used to open a fraudulent business, making her unknowingly liable. Salary withholding was also common, rendering women financially dependent and unable to escape.

f) Family Contact



Many victims were handed over by their families in childhood, under economic duress. These families hoped for better opportunities for their children, but the reality was exploitation and decades of slavery. In 40.65% of cases, the worker had no family contact; 21.97% had rare contact; 17.58% maintained some contact; and in 19.78% of cases, the family contact status was unknown.



g) Civil and Labor Documentation

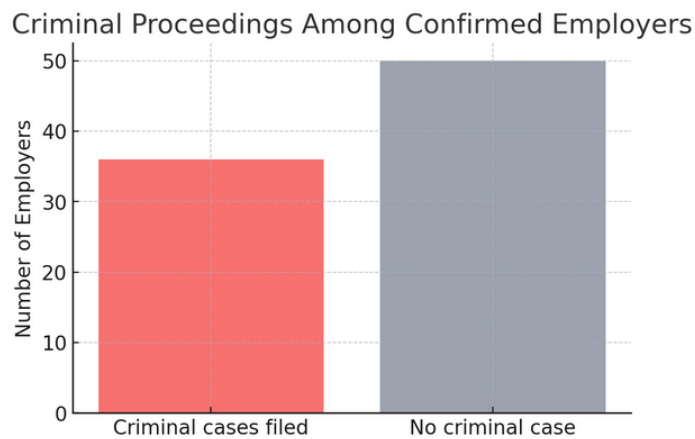
In 15.38% of cases, workers had no ID card (brazilian RG); in 6.59%, no information was provided. Without RG, people are excluded from essential services and rights. Symbolically, it represents state invisibility. Regarding work cards (CTPS): 48.35% had none; 45% had one but weren't registered as domestic workers; and 6.59% lacked information.

Research results: the empirical findings concerning criminal law on domestic slave cases

The criminal justice response to domestic slavery in Brazil remains strikingly limited and ineffective, as revealed by the analysis of judicial proceedings related to the 86 confirmed cases of domestic servitude documented between 2017 and 2023.



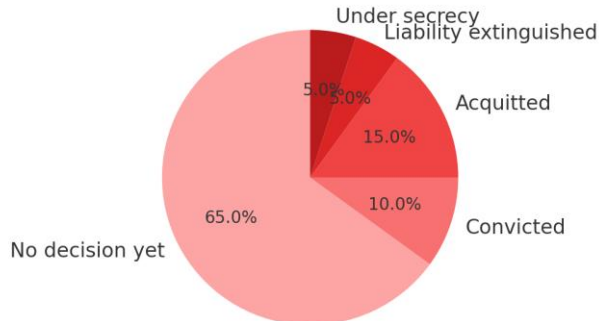
Despite clear administrative recognition of slavery-like conditions in all cases, only 36 employers (42% of the total) were subject to any form of criminal investigation. These investigations led to the initiation of just 16 criminal proceedings, involving 20 individual defendants.



As of the data cutoff on August 13, 2024, the vast majority of these cases had not reached any substantive judicial conclusion. Thirteen out of the twenty defendants, representing 65% of the total, had not yet received a first-instance ruling. Among the remaining cases, only two individuals (10% of defendants) were convicted in the first instance, while three (15%) were acquitted, one defendant (5%) had their liability extinguished due to death, and one case (5%) remained sealed under judicial secrecy. The two convictions resulted in four-year prison sentences and 97 daily fines at the minimum legal rate. However, in both cases, the custodial sentences were replaced with alternative penalties consisting of community service and pecuniary payments. As such, none of the convicted individuals served time in prison, and no final, enforceable criminal judgment had been issued in any of the reviewed cases.

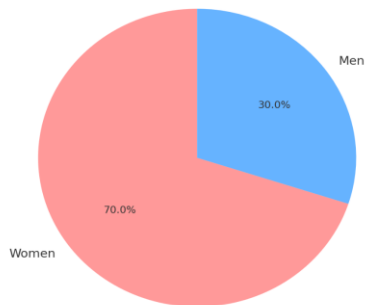


Status of Criminal Proceedings (n=20 defendants)

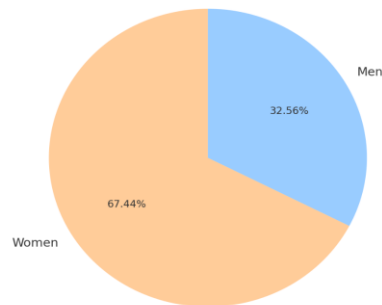


Among the 20 defendants, it was found that 14 (70%) were women. This reveals a significant predominance of females in the defendant position of these actions. Therefore, the proportion of women charged in criminal actions closely reflects their presence in the employer role in labor reports (a total of 67.44% of the 86 labor cases analyzed).

Gender Distribution Among Defendants in the Analyzed Criminal Cases



Gender Distribution Among Main Employers in Labor Inspections



However, this fact does not mean that women are inherently more likely to practice or perpetuate slave labor. Rather, this finding reflects sociocultural constructions about gender roles in the context of labor division, particularly regarding domestic labor. It is necessary to situate this data historically and socially.

The sexual division of labor historically entrenched in Brazilian society, assigns to women the responsibility for domestic tasks, caregiving, and family



management, placing them in the reproductive sphere (the private domain). Meanwhile, men are generally seen as belonging to the productive sphere (public domain). This division is deeply naturalized and tends to devalue the domestic labor typically performed (and supervised) by women.

It's also important to consider that many of the accused women belonged to higher social classes and held significant educational and financial privileges compared to the workers. Therefore, the intersectionality between gender, race, and class must be considered in this analysis. The defendants are generally white, educated, and upper-middle-class women, while the victims are mostly Black, poor, and low-educated women.

This framework highlights the need to problematize and deconstruct gender stereotypes, particularly the notion that women, by nature, do not commit violence or exploitation. Women can indeed be both victims and perpetrators of structural violence, especially when they occupy positions of power and privilege in the social hierarchy.

Back to the criminal findings, the acquittals were grounded in three types of reasoning: the non-existence of the alleged criminal act, the legal characterization of the conduct as non-criminal (atypical), and the insufficiency of evidence for conviction. These divergent legal rationales expose the judiciary's uncertainty or reluctance to apply the full scope of Article 149 of the Brazilian Penal Code, which defines the crime of reducing someone to a condition analogous to slavery.

While some judges explicitly acknowledged that physical violence or deprivation of liberty is not required for this crime to be configured, which aligns with the Federal Supreme Court jurisprudence, others appeared hesitant to interpret the broader modalities recognized by law, such as degrading conditions, exhausting work hours, and debt bondage.



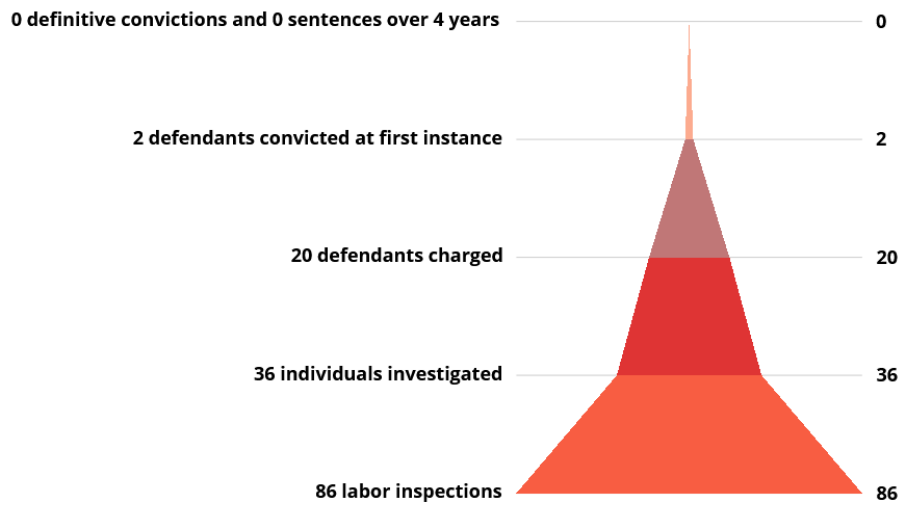
Further inconsistencies emerged in the framing of criminal liability. In some cases, judges failed to examine the specific elements listed in the indictment, or neglected to address the victim's prolonged social isolation, lack of payment, and denial of education and documentation. This omission undermines the recognition of structural coercion as a core element of domestic slavery and weakens the legal coherence and symbolic force of criminal responses.

No case analyzed resulted in asset forfeiture, criminal fines beyond the minimum, or reparation orders within the criminal process itself. All monetary penalties were restricted to symbolic amounts and tied to the substitution of custodial sentences, reinforcing a sense of impunity. Appeals were filed in the three cases with decisions (one conviction and two acquittals) but none had been reviewed by the Superior Court of Justice or the Federal Supreme Court by the time of the study's conclusion.

Taken together, the findings demonstrate that, even in cases where there is robust evidence of exploitation, including testimonies, labor inspection reports, and decades of unpaid work, the criminal system has consistently failed to impose meaningful sanctions.

With only 2.33% of confirmed exploiters facing first-instance convictions and no individual facing actual incarceration, the study illustrates the deep disjuncture between administrative recognition and judicial accountability. The normalization of domestic servitude, the intimate and invisible settings in which it occurs, and the judiciary's procedural inertia converge to produce a landscape of near-total impunity, one in which slavery persists not despite the law, but alongside its selective and symbolic application.

Pyramid of impunity can be drawn also on domestic modern slavery cases.



Observations and suggestions for fighting domestic slavery.

The inspection reports on domestic slave labor in Brazil have proven essential in illuminating and confronting this persistent form of exploitation. These documents provide granular, contextualized data that not only underpin legal proceedings and public policies but also challenge the societal invisibility that cloaks domestic slavery. Brazil's Labor Inspection system, recognized by the ILO as a model of international best practices (Nações Unidas Brasil, 2020), has played a pivotal role in documenting and combating modern slavery, especially within private households.

A crucial element of this work lies in the interdisciplinary engagement of psychologists and social workers in drafting inspection reports. Their analyses contribute valuable insights into the emotional and psychological damage inflicted upon victims, highlighting coercive dynamics and prolonged states of vulnerability. Their inclusion ensures that legal characterizations of slavery consider not only



material conditions but also the mental and affective dimensions of exploitation, aspects often overlooked in traditional legal frameworks²⁵.

Nonetheless, challenges remain, particularly regarding the systematization and comparability of inspection data across Brazilian states. Currently, the heterogeneity of documentation standards hinders the creation of a cohesive national database. A standardized inspection template—detailing criteria for working conditions, photographic documentation protocols, and typologies of abuse—would enhance the efficacy of oversight mechanisms and facilitate the formulation of responsive public policy²⁶.

In addition, the inclusion of intersectional socio-demographic data is imperative. Variables such as race, gender, income level, education, and migratory status of both victims and perpetrators must be incorporated into inspection records. Such data are not merely descriptive; they are analytically crucial in understanding patterns of systemic discrimination and socio-legal exclusion. Authors such as Bento²⁷ and Almeida²⁸ emphasize the centrality of structural racism and whiteness in Brazilian social formations—realities that any serious inspection protocol must confront.

Another urgent recommendation concerns the nexus between domestic slavery and human trafficking. Evidence from recent cases suggests that many of the exploited workers had experienced prior displacements—whether coerced or voluntary—that positioned them within trafficking routes. Recognition of these

²⁵ BITENCOURT, Cezar Roberto. Parte geral. Coleção Tratado de direito penal. Volume 1. 26. ed. São Paulo: Saraiva Educação, 2020.

²⁶ ASSOCIAÇÃO NACIONAL DOS MAGISTRADOS DA JUSTIÇA DO TRABALHO (Anamatra). Governo Lula cria novas regras e esvazia lista suja do trabalho escravo. Brasília: Anamatra, 2024. Disponível em: <https://www.anamatra.org.br/imprensa/noticias/35254-governo-lula-cria-novas-regras-e-esvazia-lista-suja-do-trabalho-escravo>. Acesso em: 12 jun. 2025.

²⁷ BENTO, Cida. O pacto da branquitude. São Paulo, Companhia das Letras, 2022.

²⁸ ALMEIDA, Silvio. Racismo estrutural. São Paulo: Jandaíra, 2019.



trajectories and their legal framing as trafficking cases could broaden the protective scope of both national and international human rights instruments²⁹.

Ultimately, the persistence of domestic slave labor in Brazil reveals not only failures in legal enforcement but also deeply ingrained cultural and racialized structures of domination rooted in the legacy of the *casa-grande*. Ending this practice requires a concerted commitment to institutional reform, intersectoral collaboration, and, crucially, the political will to recognize domestic slavery as a systemic and racialized phenomenon that undermines the constitutional promises of dignity and freedom for all³⁰.

²⁹ BRASIL. Constituição da República Federativa do Brasil de 1988. Brasília, DF: Presidência da República, 1988. Disponível em: http://www.planalto.gov.br/ccivil_03/constituicao/constituicao.htm. Acesso em: 11 jun. 2025.

³⁰ BRASIL. Conselho Nacional de Justiça. Ato Normativo n.º 0008759-45.2021.2.00.0000. Ato normativo. Recomendação. Observância dos tratados e convenções internacionais de direitos humanos. Uso da jurisprudência da Corte Interamericana de Direitos Humanos. Ato aprovado. Brasília, DF: Presidente do Conselho Nacional de Justiça, 2021. Disponível em: <https://www.tjsp.jus.br/Download/Portal/Neddif/Atos-Normativos/Ato-8759-45-2.pdf>. Acesso em: 14 jun. 2025.



Conclusions

The findings of this report demonstrate that the prevalence of modern slavery in Brazil is not merely a sporadic anomaly or the consequence of lax enforcement measures. Instead, it is the consequence of deeply entrenched structural inequalities, racial and regional disparities, and a longstanding social acceptance of exploitative labour conditions that prey on the most marginalised groups. Despite the existence of progressive legal frameworks – such as Article 149 of the Brazilian Penal Code – and enforcement mechanisms including the Dirty List, Conduct Adjustment Terms (TACs) and Public Civil Actions (ACPs), thousands of workers continue to be ensnared in forced labour conditions throughout the country.

Criminal convictions in these cases are exceedingly rare, standing as exceptions rather than the norm. High levels of impunity persist, weakening the deterrent effect of the law and reinforcing the cycle of exploitation. In fact, statistically speaking, it is more likely for two workers to be imprisoned for stealing a work tool than for an employer to be criminally convicted and incarcerated for subjecting them to conditions analogous to slavery. This glaring imbalance in accountability illustrates the profound injustice at the heart of the system and helps explain the persistence of contemporary forms of enslavement in Brazil.

Evidence collated by the UFMG Clinic on Slave Labor and Human Trafficking reveals that this exploitation disproportionately targets Black and brown individuals from economically vulnerable regions, with gender playing a decisive role—particularly in domestic work, where elderly Black women are most frequently victimized. The aforementioned workers are subjected to a range of issues, including but not limited to degrading treatment, exhaustive work routines,



debt manipulation, and coercive settings that collectively deprive them of fundamental human rights.

The report highlights that while Minas Gerais stands out for its institutional coordination and relatively effective inspections, the judicial system continues to exhibit significant gaps in ensuring criminal accountability. Cases of slave-like labor often fail to result in meaningful legal consequences for perpetrators, especially in domestic work contexts, where the privacy of the home and affective rhetoric serve as shields for exploitation. Victims remain invisible, justice is slow or denied, and impunity prevails.

At the same time, the growing reliance on Conduct Adjustment Terms (TACs) and Public Civil Actions (ACPs)—particularly those that include provisions for compensating both individual and collective moral damages—signals a shift toward a more reparative and victim-centered legal approach. This trend reflects an important evolution in institutional responses to labor exploitation. Nevertheless, the low amounts typically awarded as compensation, coupled with complex and often slow enforcement procedures, significantly undermine the ability of these tools to produce meaningful change or to deter future violations.

As a result, their transformative impact remains constrained, falling short of addressing the depth of harm suffered by the victims or of effectively challenging the structures that sustain exploitative labor practices.

A striking illustration of this limitation lies in the disparity between damage awards: on average, the amount a consumer receives as compensation for the moral distress caused by a delayed flight or lost luggage is higher than the compensation granted to a worker who has endured conditions analogous to slavery. This contradiction exposes not only a hierarchy of rights but also a deeply rooted undervaluation of the suffering experienced by those subjected to forced labor, further reinforcing the cycle of invisibility and impunity.



Ultimately, the eradication of contemporary slavery in Brazil requires more than legal formalism or administrative diligence. It demands a comprehensive and intersectional strategy that addresses the structural roots of vulnerability: poverty, racial discrimination, educational exclusion, and the commodification of labor. Public policies must go beyond reactive enforcement and embrace preventative measures, victim protection, and social reintegration programs. The invisibility and normalization of modern slavery must be confronted through education, institutional reform, and public engagement.

This report, grounded in rigorous research and direct engagement with affected populations, calls upon national authorities and the international human rights community to recognize contemporary slavery not as a residual issue, but as a systemic crisis that undermines democracy, human dignity, and the rule of law. Only through sustained political commitment, robust accountability frameworks, and inclusive development can Brazil fulfill its constitutional and international obligations to eradicate all forms of slavery once and for all.



References

ALMEIDA, Silvio. **Racismo estrutural**. São Paulo: Jandaíra, 2019.

ASSOCIAÇÃO NACIONAL DOS MAGISTRADOS DA JUSTIÇA DO TRABALHO (Anamatra). **Governo Lula cria novas regras e esvazia lista suja do trabalho escravo**. Brasília: Anamatra, 2024. Disponível em: <https://www.anamatra.org.br/imprensa/noticias/35254-governo-lula-cria-novas-regras-e-esvazia-lista-suja-do-trabalho-escravo>. Acesso em: 12 jun. 2025.

ANDRADE, Lorena Góes Pimenta de Pádua; SOUZA, Luiza Camilo de; OLIVEIRA, Maria Carolina Fernandes. **Os limites da liberdade na sociedade capitalista e o trabalho escravo contemporâneo**. Trabalho submetido à XIII Reunião Científica sobre Trabalho Escravo e Questões Correlatas, organizada pelo Grupo de Pesquisa Trabalho Escravo Contemporâneo da Universidade Federal do Rio de Janeiro, set. 2020.

BITENCOURT, Cezar Roberto. **Direito Penal - Parte geral**. Coleção Tratado de direito penal. Volume 1. 26. ed. São Paulo: Saraiva Educação, 2020.

BENTO, Cida. **O pacto da branquitude**. São Paulo, Companhia das Letras, 2022.

BRASIL. Ministério dos Direitos Humanos e da Cidadania. **Protocolo de atendimento de vítimas do trabalho escravo**. Brasília: MDHC, 2023. 60 p.

Brasil. **Decreto Nº 10.088, de 5 de novembro de 2019**. [Consolida atos normativos editados pelo Poder Executivo Federal que dispõem sobre a promulgação de convenções e recomendações da Organização Internacional do Trabalho - OIT ratificadas pela República Federativa do Brasil](#). Brasília: Presidência da República, 2019.

Brasil. **Denunciar violação de direitos humanos (Disque 100)**. *Gov.br*, S.d.

Brasil. [Constituição (1988)]. **Constituição da República Federativa do Brasil de 1988**. Brasília: Presidência da República, [2016].



BRASIL. Conselho Nacional de Justiça. Ato Normativo n.º 0008759-45.2021.2.00.0000. Ato normativo. **Recomendação. Observância dos tratados e convenções internacionais de direitos humanos.** Uso da jurisprudência da Corte Interamericana de Direitos Humanos. Ato aprovado. Brasília, DF: Presidente do Conselho Nacional de Justiça, 2021. Disponível em: <https://www.tjsp.jus.br/Download/Portal/Neddif/Atos-Normativos/Ato-8759-45-2.pdf> Acesso em: 14 jun . 2025.

Brasil. **Lei Nº 10.097, de 19 de dezembro de 2000.** Altera dispositivos da Consolidação das Leis do Trabalho – CLT, aprovada pelo Decreto-Lei no 5.452, de 1o de maio de 1943. Brasília: Presidência da República, 2000.

Brasil. **Decreto Nº 6481, de 12 de junho de 2008.** Regulamenta os artigos 3o, alínea “d”, e 4o da Convenção 182 da Organização Internacional do Trabalho (OIT) que trata da proibição das piores formas de trabalho infantil e ação imediata para sua eliminação, aprovada pelo Decreto Legislativo no 178, de 14 de dezembro de 1999, e promulgada pelo Decreto no 3.597, de 12 de setembro de 2000, e dá outras providências. Brasília: Presidência da República, 2000.

Brasil; Ministério dos Direitos Humanos e da Cidadania. **Fluxo Nacional de Atendimento às Vítimas de Trabalho Escravo.** *Gov.br*, 7 Aug. 2024.

Brasil; Ministério dos Direitos Humanos e da Cidadania. **Comissão Nacional para a Erradicação do Trabalho Escravo.** *Gov.br*, 11 May 2018.

Brasil; Ministério do Trabalho e Emprego. **Comissão Nacional de Erradicação do Trabalho Infantil.** *Gov.br*, 2025.

Brasil; Ministério do Trabalho e do Emprego. **Governo atualiza 'Lista Suja' de empresas que praticam condições análogas à escravidão.** Agência Gov, 7 Oct. 2024.

Brasil; Ministério do Trabalho e do Emprego. **Notas Metodológicas – Radar SIT.** 2024.

Brasil; Ministério do Trabalho e do Emprego. **Painel de Informações e Estatísticas da Inspeção do Trabalho no Brasil - Radar SIT.** 2024.

Brasil; Ministério Público do Trabalho; Organização Internacional do Trabalho. **Observatório da Erradicação do Trabalho Escravo e do Tráfico de Pessoas - SmartLab.** 2025.

Brasil; Tribunal Superior do Trabalho. **Protocolos de Julgamento e Atuação da Justiça do Trabalho.** *Gov.br*, 2024



BRASIL. Ministério do Trabalho e Emprego. **MTE atualiza cadastro de empregadores que submeteram trabalhadores a condições análogas à escravidão.** 02 abr. 2025.

CRUZ, Mariane dos Reis. **Trabalhadoras domésticas brasileiras:** entre continuidades coloniais e resistências. Orientadora: Dra. Maria Fernanda Salcedo Repolês. 2016. Dissertação. (Mestrado em Direito). Universidade Federal de Minas Gerais. Belo Horizonte, UFMG, 2016, p. 97. Disponível em: <https://repositorio.ufmg.br/handle/1843/BUBD-AYRNHH>. Acesso em: 12 jun. 2025.

G1. **Madalena Gordiano:** família que escravizou mulher por 40 anos é condenada a mais de 14 anos de prisão em MG. 2024. Disponível em: <https://g1.globo.com/mg/triangulo-mineiro/noticia/2024/04/17/madalena-gordiano-familia-que-a-manteve-em-situacao-analoga-a-escravidao-e-condenada-a-mais-de-14-anos-de-prisao-em-mg.html>. Acesso em: 12 jun. 2025.

GONTIJO, Roberta Puccini. **Os resignados:** do mito da outorga à conformidade perante o trabalho escravo contemporâneo. In: SANTOS, Fernanda Antunes Moreira et al. (org.). Anais do VIII Seminário Discente do Programa de Pós-Graduação em Sociologia da Universidade Federal de Minas Gerais (PPGS/UFMG). Campina Grande: Editora Amplla, 2024. p. 346–356.

HADDAD, Carlos Henrique Borlido; MIRAGLIA, Livia Mendes Moreira. Oliveira, Maria Carolina Fernandes (eds.). **O que escondem as casas grandes do Brasil no século XXI?: Um diagnóstico do trabalho escravo no âmbito doméstico.** Belo Horizonte: Editora Expert, 2025.

HADDAD, Carlos Henrique Borlido; MIRAGLIA, Livia Mendes Moreira; PEREIRA, Marcela Rage. **Dos autos de infração à ação civil pública:** um retrato do trabalho escravo em Minas Gerais. Belo Horizonte: Editora Expert, 2023

HADDAD, Carlos Henrique Borlido; MIRAGLIA, Livia Mendes Moreira; **Raio-x das ações judiciais de trabalho escravo (2008 a 2019).** 1. ed. Belo Horizonte. Disponível em: <https://www.gov.br/participamaisbrasil/publicacoes1>. Acesso em: 26 mai. 2025.

HADDAD, Carlos H.B.; MIRAGLIA, Livia M. M.; SILVA, Bráulio F. A. da. **Trabalho Escravo na Balança da Justiça.** 1. ed. Belo Horizonte: Carlos H. B. Haddad, 2020. E-



book. Disponível em: https://e675222a-38ae-46f0-9270-e03d059b1ecd.filesusr.com/ugd/635046_7d1b3705960c46da8419f4b2ed5bdf39.pdf. Acesso em: 23 mai. 2025.

HADDAD, Carlos Henrique Borlido; MIRAGLIA, Lívia Mendes Moreira. **Slave Labor and Human Trafficking Clinic at UFMG in the emergence of legal clinics in Brazil**. 2023.

HIRATA, Helena; KERGOAT, Danièle. Divisão sexual do trabalho profissional e doméstico: Brasil, França, Japão. In: COSTA, Albertina de Oliveira. SORJ, Bila. BRUSCHINI, Cristina. HIRATA, Helena (orgs). **Mercado de Trabalho e Gênero: comparações internacionais**. Rio de Janeiro: FGV, 2008. p. 263- 266.

MELO, Fernanda de Mendonça. **Trabalho escravo em cadeias produtivas: de quem é a responsabilidade?** São Paulo: Editora Dialética, 2024. 152 p.

HADDAD, Carlos Henrique Borlido; MIRAGLIA, Lívia M. Moreira. **Trabalho Escravo: entre os achados da fiscalização e as respostas judiciais**. Florianópolis: Tribo da Ilha, 2018.

IBGE. **Número de trabalhadoras domésticas caiu em 10 anos**. 2023. Disponível em: <https://agenciabrasil.ebc.com.br/geral/noticia/2023-04/ibge-numero-de-empregadas-domesticas-caiu-em-dez-anos>. Acesso em: 12 jun. 2025.

ILO. **Decent Work for Domestic Workers**. 2021. Disponível em: <https://www.ilo.org/meetings-and-events/decent-work-domestic-workers>. Acesso em: 12 jun. 2025.

LINO, André Rezende Soares. **Da fiscalização ao julgado: por uma interpretação adequada da jornada exaustiva**. 2024. 154f. Dissertação (Mestrado em Direito) – Universidade Federal de Minas Gerais, Belo Horizonte, 2024.

MINISTÉRIO PÚBLICO DO TRABALHO. PRT. 3. Região. **Termo de ajustamento de conduta**. MPT em Minas Gerais. [2020]. Disponível em: www.prt3.mpt.mp.br/servicos/termos-de-ajuste-de-conduta. Acesso em: 23 mai. 2025.

MIRAGLIA, Lívia Mendes Moreira; ARAÚJO, Maria Odete Freire de; SÁ, Emerson Victor Hugo Costa de. **O gosto amargo do açaí: a necessidade de responsabilização**



da cadeia produtiva. Belo Horizonte: Clínica de Trabalho Escravo e Tráfico de Pessoas da Faculdade de Direito da UFMG.

MIRAGLIA, Livia Mendes Moreira; FAGUNDES, Maurício Krepsky. **The Cargill conviction on slave and child labor: an analysis of company accountability in the supply chain.** *International Labor Rights Case Law*, v. 10, p. 94–99, 2024.

MIRAGLIA, Livia Mendes Moreira; FAGUNDES, Maurício Krepsky. **Trabalho Digno: A face oculta da lista suja do trabalho escravo.** *Laborare*, ano VI, n. 11, p. 7–24, jul./dez. 2023. Disponível em: <https://revistalaborare.org/>.

MIRAGLIA, Livia Mendes Moreira. O trabalho escravo na perspectiva do Tribunal Superior do Trabalho. **Revista da Faculdade de Direito da UFMG**, Belo Horizonte, n. 77, p. 125–144, jul./dez. 2020.

MIRAGLIA, Livia Mendes Moreira. **Pobreza, escravidão e pandemia: o que esperar do futuro do trabalho?** 2021. Texto de reflexão acadêmica.

OLIVEIRA, Maria Carolina Fernandes; LOPES, Marianna Gomes Silva; RODRIGUES, Tamiris Souza (org.). **Quanto vale a dignidade? Estudos contemporâneos sobre trabalho escravo** [recurso eletrônico]. Colab. GENEROSO, Rebeca Oliveira; FERNANDES, Samuel Almeida; ESBERARD, Shevah Ahavat; il. TRAZZI, Bianca Bernardes. Belo Horizonte: RTM, 2021. 243 p. Il. Inclui bibliografia.

SINAIT. **Na mídia - Caso de resgate de trabalhadora doméstica escravizada por 38 anos em MG tem desdobramentos.** 2021. Disponível em: <https://www.sinait.org.br/noticia/18590/na-midiacaso-de-resgate-de-trabalhadora-domestica-escravizada-por-38-anos-em-mg-tem-desdobramentos>. Acesso em: 12 jun. 2025.

PEREIRA, Marcela Rage. **A invisibilidade do trabalho escravo doméstico e o afeto como fator de perpetuação.** Belo Horizonte: Editora Dialética, 2021, p. 17. Disponível em: <https://repositorio.ufmg.br/handle/1843/38505>. Acesso em: 12 jun. 2025.

TEODORO, Maria Cecília Máximo; PEREIRA, Flávia Souza Máximo; MIRAGLIA, Livia Mendes Moreira. **Direito material e processual do trabalho: feminismo,**



CLÍNICA DE TRABALHO ESCRAVO E TRÁFICO DE
PESSOAS DA FACULDADE DE DIREITO DA UFMG

trabalho e epistemologias insurgentes. Coord. Rainer Bomfim. Belo Horizonte:
Editora Dialética, 2023.

United Nations. **Guiding Principles on Business and Human Rights:
Implementing the United Nations “Protect, Respect, and Remedy” Framework.**
New York and Geneva: UN OHCHR, 2011.