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ANNEX V

to the Commission Implementing Decision on the financing of the multiannual action plan for the Global Challenges (People) thematic programme for 2025-2027

Action Document for Global Action against the Financial and Digital-based Dimensions of the Smuggling of Migrants
MULTIANNUAL PLAN

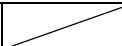
This document constitutes the multiannual work programme within the meaning of Article 110(2) of the Financial Regulation, within the meaning of Article 23 of the NDICI-Global Europe Regulation.

1 SYNOPSIS

1.1 Action Summary Table

1. Title CRIS/OPSYS business reference Basic Act	Global Action against the Financial and Digital-based Dimensions of the Smuggling of Migrants OPSYS number: ACT- 62955 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe)
2. Team Europe Initiative	Yes Team Europe Initiative to Support Africa in Combating Illicit Financial flows and transnational organized crime. Team Europe Initiatives (TEI) of the Atlantic/Western Mediterranean and the Central Mediterranean Routes
3. Zone benefiting from the action	The action shall be carried out at global level
4. Programming document	Multi-annual Indicative Programme for the NDICI-Global Europe ‘Global Challenges’ – Thematic Programme 2021-2027 - People
5. Link with relevant MIP(s) objectives / expected results	The proposed Action will contribute to the Global Challenges MIP priority area 1: People; Specific objective 5 migration and forced displacement; Result 1 regarding increased support for global migration partnerships and processes and promoting the positive impact of migration on development
PRIORITY AREAS AND SECTOR INFORMATION	
6. Priority Area(s), sectors	151 – Government and Civil Society – General
7. Sustainable Development Goals (SDGs)	Main SDG : SDG 10.7: Facilitate orderly, safe, regular and responsible migration and mobility of people, including through the implementation of planned and well-managed migration policies. Other significant SDGs : SDG 16.4 Significantly reduce illicit financial and arms flows, strengthen recovery and return of stolen assets, and combat all forms of organized crime

	SDG 17. Strengthen the means of implementation and revitalize the global partnership for sustainable development. SDG 5. Gender Equality, Target 2: Eliminate all forms of violence against all women and girls in the public and private spheres, including trafficking and sexual and other types of exploitation			
8 a) DAC code(s)	15130 - Legal and judicial development 10% 15190 - Facilitation of orderly, safe, regular, and responsible migration and mobility 80% 15160 – Human rights 10%			
8 b) Main Delivery Channel	40000 – Multilateral Organization			
9. Targets	<input checked="" type="checkbox"/> Migration <input type="checkbox"/> Climate <input type="checkbox"/> Social inclusion and Human Development <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Biodiversity <input type="checkbox"/> Education <input checked="" type="checkbox"/> Human Rights, Democracy and Governance			
10. Markers (from DAC form)	General policy objective @	Not targeted	Significant objective	Principal objective
	Participation development/good governance	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Aid to environment @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Gender equality and women's and girl's empowerment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Reproductive, maternal, new-born and child health	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Disaster Risk Reduction @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Inclusion of persons with Disabilities @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Nutrition @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	RIO Convention markers	Not targeted	Significant objective	Principal objective
	Biological diversity @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Combat desertification @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change mitigation @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change adaptation @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Internal markers and Tags:	Policy objectives	Not targeted	Significant objective	Principal objective
	Digitalisation @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	digital connectivity	<input type="checkbox"/>	<input type="checkbox"/>	
	digital governance	<input type="checkbox"/>	<input type="checkbox"/>	
	digital entrepreneurship	<input type="checkbox"/>	<input type="checkbox"/>	
	digital skills/literacy	<input type="checkbox"/>	<input type="checkbox"/>	

	digital services	<input type="checkbox"/>	<input type="checkbox"/>	
	Migration @	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Reduction of Inequalities @	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Covid-19	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
BUDGET INFORMATION				
12. Amounts concerned	Budget line(s) (article, item): 14.020240 – Global Challenges People Total estimated cost: EUR 15 000 000 Total amount of EU budget contribution EUR 15 000 000 The contribution is for an amount of EUR 15 000 000 from the general budget of the European Union for 2025.			
MANAGEMENT AND IMPLEMENTATION				
13. Implementaton modality	Indirect management with United Nations Office on Drugs and Crime (UNODC) in accordance with the criteria set out in section 4.3.1			

1.2 Summary of the Action

The smuggling of migrants (SOM) is a highly profitable business, with criminal networks and individuals thriving on the high demand for smuggling services in certain regions and the low risk of detection and punishment. Tackling smuggling of migrants requires a comprehensive and evidence-based approach. This Action will provide the requisite situational picture on financial flows and digital aspects of migrant smuggling to inform counter-smuggling measures. The financial flows that derive from this activity not only represent the financial benefit associated with migrant smuggling but also include the money used to bribe corrupt officials and to fund the logistics of smuggling operations. The income generated, mostly cash, is then transferred and laundered through various means, including legitimate businesses, regulated and unregulated financial sectors and formal and informal money or value transfer services, making the tracing and disruption of these flows a complex challenge for law enforcement and financial institutions. In recent years, SOM networks and actors have also increasingly used information and communications technologies as an instrument for their criminal activity. In doing so, they have left enormous amounts of digital traces both in content and traffic data that are yet to be exploited for criminal justice action and responses.

This Global Action aims to strengthen the capacity of national authorities to detect, prevent, disrupt, investigate and prosecute migrant smuggling, by enhancing their capacity to identify and track related financial flows and to seize the proceeds of crime, and through detecting and disrupting the misuse of information and communication technology in the organization and facilitation of migrant smuggling, and using digital traces to effectively investigate and prosecute smugglers and their associates. By disrupting the economic incentives and dimensions driving this illicit activity, the project endeavours to reduce the benefits for criminal networks, uphold the rule of law, combat impunity, and preserve human dignity.

The objectives of the Global Action are: 1) to produce up-to-date situational pictures of migrant smuggling and increase the understanding of SOM facilitated by the misuse of information and communication technologies (digitally-enabled SOM) and financial flows associated with SOM along specific migrant smuggling routes and connecting countries that face similar issues, while promoting effective anti-smuggling measures; 2) to enhance the capacity of law enforcement and prosecutors to detect, investigate and prosecute digitally-enabled SOM and financial flows, financial crime and money laundering related to migrant smuggling; 3) to enhance public-private information sharing and partnership; and 4) to improve international cooperation in criminal matters adopting uniform whole-of-the-route and human-rights based and protection approaches.

The Global Action will **work primarily with countries of origin and transit affected by migrant smuggling flows**, while at the same time promoting cross-regional and international cooperation and exchange of expertise with countries of destination, in particular in Europe.

Working with countries of origin will contribute to the disruption of transactions at the source, making it more difficult for smuggling networks to obtain profits. Putting emphasis on financial investigations in origin and transit countries will help prevent smuggling networks from establishing deeper roots, which can be harder to eradicate over time. Through a “follow the money trail” approach, the Action will be able to collect significant information, including financial information on the transactions, transfers, methods, and routes. At the same time, the Action will tailor its intervention to the specific needs and context of each partner country.

The Action will also support and promote the application of adequate procedural safeguards with regards to digital investigations into migrant smuggling, to ensure proportionality of law enforcement action. This includes applying the UN Human Rights Due Diligence Policy (HRDDP) to the provision of all equipment.

Complementarity and coordination with other EU funded global, regional or country projects on smuggling of migrants, Financial Crime and Cybercrime will be ensured.

The Action would partially contribute to the Team Europe Initiative to Support Africa in Combating Illicit Financial flows and transnational organized crime. Illicit Financial Flows (IFFs) as well as Transnational Organized Crime (TOC) constitute critical challenges to development, peace, security, and stability in Africa. Countries’ ability to achieve the Sustainable Development Goals is undermined where IFFs and TOC prevail. The UN 2030 Agenda identifies thus the reduction of IFFs and TOC as a priority area, as reflected in target 16.4: “by 2030, significantly reduce illicit financial flows and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organised crime”. This Action also partially contributes to the two Team Europe Initiatives (TEI) focused on the Atlantic/Western Mediterranean and the Central Mediterranean migratory routes and which ensure joint efforts by Member States and the EU addressing the migration challenges.

The Action contributes also to the thematic area of EU Gender Action Plan III (EU GAP III) “Integrating the Women, Peace and Security agenda” and “Ensuring freedom from all forms of gender-based violence.”¹

This Action will be implemented over the course of 36 months, starting in 2025.

1.3 Zone benefitting from the Action

The Action shall be carried out at global level, in countries jointly selected by the Commission and UNODC.

The selection of the target countries shall be informed by the combination of the following criteria:

- Countries must be ODA recipients
- Prevalence of criminal activity by smuggling networks known or believed to be active in those countries;
- Importance of the geographic location of the countries along major migration routes in Asia, Latin America or Africa, offering opportunities for the conduct of smuggling operations and the establishment of hubs from which migrant smuggling business, financial transactions, and related activities (transportation, accommodation, creation and procurement of fraudulent documents etc.) are coordinated;
- Previous interventions and work carried out to develop national and regional capacities to combat the smuggling of migrants and buy in / ownership of partner countries that ensured sustainability;
- Complementarity with previous, ongoing and planned programmes (funded by the European Union, EU member states and other donors) to address the smuggling of migrants as a form of organized crime;
- Level of cooperation with the EU and EU Member States on migration management;
- Origin and/or transit countries covered by other interventions of similar or different nature of the Team Europe Initiatives on the Atlantic/Western Mediterranean and the Central Mediterranean routes.

2 RATIONALE

2.1 Context

The global migrant smuggling industry fills a market niche to supply a demand for mobility outside of regular channels, for a profit. Sophisticated smuggling networks comprising offenders from countries of origin, transit and destination operate to obtain financial or other material benefits in markets that also include medium- and low-level

¹ European Commission, ‘EU GENDER ACTION PLAN (GAP) III – AN AMBITIOUS AGENDA FOR GENDER EQUALITY AND WOMEN’S EMPOWERMENT IN EU EXTERNAL ACTION’join-2020-17-final_en.pdf

offenders operating individually or on the basis of loose, *ad hoc* cooperation, and facilitators of regular travel.² Networks, groups or individual actors are more or less prominent depending on the mode of smuggling – land, sea or air –, the length and geographies of the routes, and the socioeconomic background of their customers.

In some countries, impoverished communities may also be involved in migrant smuggling operations, for subsistence in a context of limited alternatives for income generation. At the same time, high-level organizers and operatives who coordinate migrant smuggling between several countries or continents, and accrue the largest financial benefits, are not often identified and prosecuted by national authorities. Persons who provide support to the irregular crossing of borders by migrants on humanitarian grounds and without seeking any profit will not fall within the scope of this Action, nor those who facilitate regular travel, e.g., within free movement regions such as ECOWAS or the Andean Community (CAN).

The European Union (EU) has recognized that a key obstacle in combatting smuggling of migrants is the lack of data and analysis on migrant smuggling offences, including on related financial flows and digital aspects. The need for a stronger evidence-base to support effective policymaking, and to monitor, evaluate and improve counter-smuggling policies and practices, is highlighted in the proposal for a new EU Directive on preventing and countering the facilitation of unauthorized entry, transit and stay.

Migrant smuggling relies on a broad range of financial operations and may encompass an array of illicit activities including document fraud, facilitation of irregular border crossing for a profit, and, in some cases, the abuse and exploitation of migrants, which may constitute aggravated smuggling offences. The financial flows derived from smuggling operations not only represent the financial benefit from payments by vulnerable migrants but also include money used to bribe corrupt officials and to fund the logistics of smuggling operations, as well as the transfer and concealment of crime proceeds. Moreover, financial flows leave a footprint, crucial for the efforts of law enforcement to identify the high-level organizers who benefit the most from profits resulting from the smuggling of migrants.

The **EU Pact on Migration and Asylum**, adopted in May 2024, includes as one of its four pillars “Embedding Migration in International Partnerships”, which covers preventing irregular departures and loss of life, and fighting migrant smuggling.³ The Pact foresees anti-smuggling operational partnerships along key migrant smuggling routes.

The **EMPACT cycle** for 2022-2025 sets out the **fight against migrant smuggling as one of its ten EU crime priorities**, aiming to fight criminal networks involved in migrant smuggling through a dedicated operational action plan (OAP) that also connects initiatives together and brings consistency.⁴ The Action will therefore be articulated with EMPACT.

The **EU strategy to tackle organised crime for 2021-2025**⁵ aims to boost law enforcement and judicial cooperation, tackle organised crime structures and high priority crimes, also by tracing and removing criminal profits. A key instrument is the recent adoption of the Asset recovery and confiscation directive which promotes the immediate launch of asset-tracing investigations by competent authorities. The **EU Roadmap to fight drug trafficking and organised crime**⁶ highlights the importance of boosting EU cooperation with countries in Latin America and the Caribbean in the fight against organised crime, including those involved in smuggling of migrants. One of the key pillars of the roadmap is to strengthen financial investigations and the recovery of criminal assets outside the EU with the aim at dismantling high-risk criminal networks.

This approach has been further highlighted by the Commission President Ursula von der Leyen in her political guidelines for the next European Commission 2024-2029 stressing the importance of fighting migrant smuggling by using a ‘follow the money’ approach to tackle illegal profits, including through enhanced cooperation on asset confiscation.

² See: UNODC Observatory on Smuggling of Migrants: www.unodc.org/unodc/en/data-and-analysis/observatory_som.html; Europol, *Europol Spotlight: Criminal Networks in Migrant Smuggling* (12 July 2023): www.europol.europa.eu/cms/sites/default/files/documents/Europol%20Spotlight%20Report%20-%20Criminal%20networks%20in%20migrant%20smuggling.pdf; FATF (2021). *FATF REPORT: Money Laundering and Terrorist Financing Risks Arising from Migrant Smuggling*: www.fatf-gafi.org/content/dam/fatf-gafi/reports/ML-TF-Risks-Arising-from-Migrant-Smuggling.pdf.

³ https://home-affairs.ec.europa.eu/policies/migration-and-asylum/pact-migration-and-asylum_en.

⁴ **EMPACT fighting crime together - European Commission (europa.eu)**. Other priorities include high-risk criminal networks, child sexual exploitation, trafficking in human beings, fraud, economic and financial crimes and firearms trafficking, among others.

⁵ eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021DC0170

⁶ eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52023DC0641

The Action is fully aligned with the **renewed EU action plan against migrant smuggling (2021-2025)**⁷. It will also be a key initiative to assist countries respond to the call to action on a **Global Alliance against migrant smuggling**, launched by the European Commission in November 2023.

The Action is also aligned with the **European Commission EU Gender Action Plan – GAP III** for the period 2021-2025, and is also expected to contribute to delivering on the Joint vision for 2030 set out at the February 2022 European Union (EU)-African Union (AU) Summit where both continents' leaders agreed on an enhanced and reciprocal partnership for migration and mobility.

This Action will contribute to **Sustainable Development Goal 10.7** (Facilitate orderly, safe, regular and responsible migration and mobility of people, including through the implementation of planned and well-managed migration policies). The Action meets the commitment set in the **European Consensus on Development (2017)**, which states that “the EU and its Member States (...) will also fight against the smuggling of migrants and trafficking in human beings, which are sources of instability⁸”.

At the Global level, several resolutions by the United Nations General Assembly, Security Council, Economic and Social Council and its Commission on Crime Prevention and Criminal Justice, the Conference of the Parties to the UNTOC as well as the recommendations of the Intergovernmental Working Group on Smuggling of Migrants, have **all recognized the value and need of closer South-South cooperation** calling on UNODC's technical assistance to enhance such cooperation. This has been most recently and precisely captured by the Conference of the Parties to the United Nations Convention against Transnational Organized Crime, through a key thematic resolution co-sponsored by 50 States across all regions.⁹

The Action will **complement, seek synergies and coordinate with other EU-funded actions** implemented at global, regional and country level **that address other aspects of counter-smuggling**, such as: Promoting Action and Cooperation among countries at Global Level against Trafficking in Persons and the Smuggling of Migrants (PACTS); Support to the Niamey Declaration; Better Migration Management III and IV for Eastern Africa (upcoming); the EU-funded Regional Operational Centre in support of the Khartoum Process (ROCK); Support to Migration Governance in Nigeria; Eurofront Programme; EL PAcCTO 2.0 Programme in the LAC region, SECFIN Africa (Securing a robust AML/CFT Framework Against Illicit Financial Flows in Sub-Saharan Africa); the Global Anti-Money laundering / Countering Terrorism Financing Facility; Improving Migration Management and Migrant Protection in selected Silk Route countries (PROTECT); Preventing and addressing Trafficking in Human Beings (THB) and Smuggling of Migrants (SOM) in South Asia; The Common Operational Partnerships (COPs) in West Africa; HIMAYA (Prévenir, contrer et démanteler le trafic de migrants et la traite des êtres humains en Afrique du Nord); the Global Illicit Flows Programme (GIFP), in particular: Container Control Programme (CCP), AIRCOP, CRIMJUST as well as upcoming programmes on THB and SOM, in particular in Tunisia and Morocco. This coordination will be ensured through continuous communication and coordination of relevant activities, as well as regular exchange with the European Union Delegations and implementing partners involved on those programmes. The Action will also follow closely developments and activities under other EU-funded initiatives, in particular the European Multidisciplinary Platform Against Criminal Threats (EMPACT), ENACT, and the European Cybercrime Training and Education Group (ECTEG).

2.2 Lessons learnt

Despite the efforts deployed by national authorities in all countries, important challenges remain to disrupt the smuggling networks, to collect digital and forensic evidence and to integrate the financial dimensions of migrant smuggling in investigations. The persisting lack of parallel financial investigations was expressed by the MENAFATF mutual evaluation for Morocco, one of the partner countries of this Action.¹⁰

- Ensure **consistent engagement with the activities proposed by the Action** on the part of all relevant national institutions. This has proved to be crucial for the ownership, sustainability and ultimately success of projects in several occasions, including a EUTF-funded regional project “Disrupting criminal trafficking and

⁷ COM(2021)591

⁸ European Consensus on Development - ‘our world, our dignity, our future’ - 26/06/2017, p.37.

Moreover, the UN General Assembly Political Declaration on the Implementation of the United Nations Global Plan of Action to Combat Trafficking in Persons (Resolution 76/7) which stressed the need “to intensify international cooperation, including capacity-building, exchange of best practices and know-how and technical assistance, especially for least developed and developing countries, including small island developing States, aimed at strengthening their ability to prevent all forms of trafficking and address the special needs of victims, including supporting their development programmes and to strengthen their criminal justice systems.”

¹⁰ MENAFATF mutual evaluation report for Morocco, 2019, <https://www.menafatf.org/sites/default/files/Newsletter/Morocco-MER-19.6.pdf>

smuggling networks through increased anti-money laundering and financial investigation capacity in the Greater Horn of Africa (AML-THB)". The appointment of qualified staff to trainings by national authorities and their active participation in organizing activities, including joint activities with other countries, is beneficial to improving national and regional exchanges and cooperation.

- **Data collection and analysis** is key to developing effective responses to migrant smuggling, but very few countries have reliable baseline data. When it comes to the financial and digital dimensions of migrant smuggling, knowledge and information available is even more scarce. This action will endeavour to bridge this gap by building on successful methodologies and projects to conduct actionable research on the financial and digital aspects of migrant smuggling along specific routes.
- **Capacity building** should be anchored by mentors – ideally in hubs or hotspots – with direct access to senior operational decision makers and must include blended learning to supplement traditional workshop or classroom learning and simulation. Capacity building strategies can help identify how to make skills development more sustainable and embedded in national processes and training curricula/programmes. The action will locate its capacity building activities in the context of the overall criminal justice system, with consideration of factors such as recruitment and retention, operational guidelines and resource availability.
- **Multi-disciplinary capacity building activities** bringing together law enforcement, judiciary, FIUs and AML/CFT supervisory authorities and **promoting partnerships with civil society and the private sector** increase efficiency in combatting illicit financial flows. Such multidisciplinary approaches to address illicit financial flows have proven particularly effective in the OCWAR-M project¹¹.
- Integrate a **human-rights based approach in identifying, investigating and prosecuting migrant smuggling**: Experience has shown that even countries that reportedly do not want to address SOM (due to the remittance economy) do want to take steps to protect their citizens and target the smugglers that put them in danger. Promoting a **rights-based approach** such as in the UN SOM Protocol is more effective as it also allows to create trust and favour contribution of smuggled migrants in criminal proceedings.
- Need to **encourage interaction, strengthen channels of communication and promote cooperation in criminal matters** between countries affected by same migrant smuggling routes. Experience has shown that migrant smuggling routes are dynamic and constantly changing.

2.3 Problem Analysis

A serious lack of reliable data and information leading to an incomplete situational picture on migrant smuggling at a global level persists, with significant implications for the efficacy of counter-smuggling efforts. The need for a stronger evidence base to support effective policymaking, and to monitor, evaluate and improve counter-smuggling policies and practices, is highlighted in the proposal for a new EU Directive on preventing and countering the facilitation of unauthorized entry, transit and stay¹². One of the priority areas of the EU's renewed Action Plan against Migrant Smuggling (2021-2025) is increasing the knowledge base on migrant smuggling.

Research into the financial dimension of migrant smuggling is required to inform the design of IFF-Smuggling activities. IFFs associated with smuggling of migrants are generated through cash payments, cash couriers, value transfers using regular banking, hawala/hundi and other similar systems, and to a lesser extent, money or value transfer service (MVTs) providers. As such, they are particularly opaque and poses challenges to law enforcement and judicial authorities, as the majority of cases involve payment and transfer methods that are not easily traceable. Therefore, an enhanced understanding and analysis of illicit financial flows associated to migrant smuggling is a crucial step towards more effective disruption, prosecution and dismantling of migrant smuggling networks.

Similarly, in recent years there is a sharp rise in the utilization of digital solutions, social media, messaging services and internet-based communication platforms as well as cryptocurrencies to facilitate and coordinate the activities of migrant smuggling networks calls. In order to keep pace with the smugglers, criminal justice authorities need an up-to-date situational picture of the various ways technology and the digital domain are misused by criminals. This knowledge-base is crucial for the design of digital related activities and will be developed through the research and analysis into the modalities of digitally-enabled smuggling. Despite an overall increase in counter migrant smuggling

¹¹ *Organised Crime - West African Response to money laundering and the financing of terrorism*" (OCWAR-M) project, funded under 11th ED with EUR 6,75M, implemented from 2019-2024 by Expertise France in 15 ECOWAS countries + Mauritania

¹² <https://data.consilium.europa.eu/doc/document/ST-16910-2024-INIT/en/pdf>

efforts among partner countries, significant challenges persist in responding to smuggling of migrants in the two specific areas of focus of the action, and in particular:

Limitations by partner countries in tracing illicit financial flows derived from SOM and scarcity of financial investigations associated to migrant smuggling cases carried out. The 2018 *UNODC Global Study on Smuggling of Migrants* estimates that at least 2.5 million migrants were smuggled in 2016 for an income of US\$5.5-7 billion. This figure represents only the known portion of this crime. Smuggling fees are largely determined by the distance of the smuggling itinerary, number of border crossings, geographic conditions, means of transport, the use of fraudulent travel or identity documents, risk of detection and others. Higher profits are made by organizers of networks rather than by independent, low-level smuggling actors, though the latter are more likely to come into contact with law enforcement.¹³ For responses to address the high-level organized crime actors behind migrant smuggling, multi-country investigations and coordinated efforts to identify financial flows and assets are needed.

Funds are not only transferred through traditional financial institutions but through peer-to-peer platforms, money or value transfer services, including Western Union, MoneyGram and Orange Money, as well as through *hawala*, *hundi* and underground banking with some services falling outside the scope of the regulated banking sector or otherwise remaining inadequately supervised and regulated.

Illicit Financial Flows (IFFs) are financial flows that are illicit in origin, transfer, or use, that reflect an exchange of value and cross country borders. Monitoring and combatting IFFs associated with smuggling of migrants is crucially important for disrupting, prosecuting, and dismantling the organized criminal networks committing the smuggling offences. In 2022, the Financial Action Taskforce (FATF) published a report on money laundering and terrorist financing links to smuggling of migrants. The report finds that while many countries do not consider smuggling of migrants a high-risk crime for money laundering, the prevalence is increasing and criminal justice responses are inadequate. This is exacerbated by the use of cash couriers, unregulated and unsupervised *hawaladars*, as well as professional laundering networks for transferring crime proceeds. On the other hand, the use of social media and encrypted digital communications presents opportunities for gathering digital evidence on smuggling activities, including financial flows.¹⁴ The report underlines “*the importance of strengthening cooperation with the private sector and providing them guidance and information on the specific methods that the smugglers are using to transfer and conceal proceeds.*”¹⁵

Smugglers often use cash-intensive businesses, front companies (such as travel agencies), aliases, straw men and false documents to conceal the proceeds and instruments of crime, mixing proceeds of crime with legitimately earned funds. Accumulation of ill-gotten assets and money laundering occurs through different channels, such as markets operated by criminal organizations, infiltration of organized crime into the legal economy, or re-investment of proceeds of crime into criminal activities. Cryptocurrencies, with their inherent anonymity and decentralized nature, are also becoming an increasingly popular tool, at higher levels of the organized criminal chain.¹⁶ These money and value movements leave a footprint which when collected and analyzed provides a rich vein of financial intelligence to detect and target smuggling operations. Even though money is at the core of any migrant smuggling operation, few parallel financial investigations are carried out to detect and/or target migrant smuggling cases to disrupt networks’ activities. This affects the capacity of the authorities of many countries to properly tackle the organized crime dimension of these crimes.

Increasing use of information and communications technologies (ICT) as an instrument for migrant smugglers’ operations. Social media platforms have become important channels to advertise and transmit information about routes, services, fees and movement of migrants, sharing pictures and videos of documents and tickets. Online communication applications are used by smuggled migrants to maintain communication with smugglers, rate the “services” they receive and exchange experiences about their journeys. Technology is further misused by criminal networks to facilitate the copy, production and trade of fraudulent identity and travel documents and also to do counter-intelligence operations on law enforcement activities. Moreover, the digital tools employed to

¹³ Europol, *Europol Spotlight: Criminal Networks in Migrant Smuggling* (12 July 2023): www.europol.europa.eu/cms/sites/default/files/documents/Europol%20Spotlight%20Report%20-%20Criminal%20networks%20in%20migrant%20smuggling.pdf.

¹⁴ FATF (2021). *FATF REPORT: Money Laundering and Terrorist Financing Risks Arising from Migrant Smuggling*: www.fatf-gafi.org/content/dam/fatf-gafi/reports/ML-TF-Risks-Arising-from-Migrant-Smuggling.pdf.

¹⁵ FATF (2021). *FATF REPORT: Money Laundering and Terrorist Financing Risks Arising from Migrant Smuggling*: www.fatf-gafi.org/content/dam/fatf-gafi/reports/ML-TF-Risks-Arising-from-Migrant-Smuggling.pdf, p.5.

¹⁶ See: [Casino_Underground_Banking_Report_2024.pdf\(unodc.org\)](http://Casino_Underground_Banking_Report_2024.pdf(unodc.org))

organize and run migrant smuggling operations add another layer of protection for the leaders of the criminal networks that shields them from law enforcement action. In this scenario, the misuse of information and communications technologies has become a key tool for migrant smuggling. It is so widespread in the context of smuggling of migrants that the term “digital smuggling” has been coined.

In this modern reality, countries need to adopt a blend of advanced technologies and traditional methods to fight the issue. Still, authorities lack specialized knowledge on the *modus operandi* of smuggling networks when it comes to digitally-enabled smuggling, tools capable of extracting and processing content and traffic data, and skills to manage and analyse the latter. During the first thematic meeting on “Tackling Migrant Smuggling in the digital domain” held in April 2024, in response to the Global Alliance Call to Action launched by the European Union in November 2023, participants agreed on the need to foster a deeper cooperation between law enforcement, judiciary and the private sector to tackle the challenges presented by migrant smuggling in the digital space..

Low levels of bilateral, regional, and international cooperation on criminal justice matters between the relevant authorities. Even where there are national coordinating mechanisms in place, and countries are parties to the UNTOC, effective coordination between the relevant authorities has not been achieved in the partner countries.¹⁷

Gender, diversity, and violence patterns of migrant smuggling. Different characteristics can affect an individual's access to resources, opportunities, and social support, influencing their choices and strategies. Additionally, certain characteristics can make individuals more susceptible to exploitation, abuse, violence, and other forms of harm in the context of migrant smuggling. For example, patriarchal systems prevalent in some countries create an environment where women are marginalized and denied access to regular migration pathways. This exclusion stems from societal norms and structures that restrict women's freedom of movement and decision-making power. In addition, Migrants with disabilities and individuals with medical conditions are also at a disadvantage due to discriminatory practices that neglect their specific needs and rights during the migration process.

Although there has been growing interest in exploring the intersectionality between an individual's characteristics, their decision to embark on a journey facilitated by migrant smugglers, and the impact of that decision on their physical and emotional health, this area of study is still in its early stages¹⁸.

In many instances, smuggled men and women were intentionally separated in order to exercise different types of violence upon them; while men would suffer severe forms of physical violence including torture practices, women would primarily be targeted for sexual torture. Sexual violence or use of sex as a “currency” to pay smugglers or kidnappers and move on is an unfortunate common feature of all smuggling routes that affects female migrants in a much larger proportion than men.¹⁹ At times technology is being used to perpetuate the victimization and stigmatization by the broadcasting of material depicting sexual violence among the community of the victim.

Sustainability of capacity building and training activities undertaken. The Action will endeavour to increase ownership and sustainability of its interventions by integrating, to the extent possible, the training materials and modules that will be produced under the Action in the programmes and curricula of training schools and institutes for law enforcement and judicial officers.

Additional considerations²⁰

Under IFF/Smuggling activities, while some countries developed some capacity to deal with the increased criminal revenue resulting from migrant smuggling, most countries need support to integrate the financial dimension into their investigations and prosecutions into migrant smuggling. This Action will support law enforcement and prosecutors that are assigned with migrant smuggling cases to increase their skills in conducting such financial investigations and prosecutions and to cooperate to that effect with financial institutions, the private sector or counterparts abroad. To

¹⁷ <https://www.unodc.org/unodc/es/data-and-analysis/som-observatory.html>

¹⁸ UN Network on Migration, Mapping the Landscape of the Smuggling of Migrants, 2022

https://migrationnetwork.un.org/system/files/resources_files/Mapping%20the%20Landscape%20of%20the%20Smuggling%20of%20Migrants_Final.pdf

¹⁹ UNODC, Abused and Neglected, A gender perspective on Aggravated Migrant Smuggling Offences and Response, 2022, page 5, https://www.unodc.org/documents/human-trafficking/2021/Aggravated_SOM_and_Gender.pdf

²⁰ Indicatively are prioritised for selection under this Action Pakistan, Colombia, Costa Rica, Panama, Ethiopia, Mauritania, Senegal, Nigeria, Tunisia, Morocco. This list may be changed or developed through joint Commission-UNODC decision taken in the context of the project steering committee. Depending on the final list of countries, this Action may partially contributes to the Team Europe Initiative to support Africa in combatting illicit financial flows and transnational organized crime and partially contributes to the two Team Europe Initiatives (TEI) focused on the Atlantic/Western Mediterranean and the Central Mediterranean migratory routes.

avoid duplications and overlaps, an initial inception phase of 3 months is planned, in order to set-up coordination mechanisms, especially with key regional initiatives such as BMM II or SECFIN.

Under Digital/Smuggling activities, all countries have witnessed a rise in digitally-enabled migrant smuggling, as social media are massively used to offer smuggling services, recruit migrants and facilitate the irregular journeys on land or at sea. This action will endeavour to equip investigators and prosecutors with the skills and knowledge required to better understand the various ways migrant smuggling is digitally-enabled, so as to better investigate and prosecute the migrant smuggling networks that misuse technology. The Action will coordinate with other projects such as with the Regional Operational Centre in Support of the Khartoum Process (ROCK) in the Horn of Africa and its Liaison Officers Network.

Equipment to be procured under the Action and Human Rights considerations. Under Digital/Smuggling activities, the Action will procure and transfer to partner countries equipment and technical tools that will enable them to improve their detection and analytical capacity of digitally-enabled SOM. Equipment will be provided with fit-to-purpose technical features, mentoring and training on the use of the equipment in compliance with the rule of law and human rights standards, fostering the respect of national and international legal frameworks, including international best practice on forensic investigations, with particular attention to the chain of custody, privacy and data protection and non-discrimination and gender considerations.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action:

The Action will complement and build upon the data and intelligence gathering operations of the European Union Agency for Law Enforcement Cooperation (Europol), including through its European Migrant Smuggling Centre (EMSC), Interpol, Eurojust, Frontex, the EU Agency for Asylum (EUAA), the EU Naval Force Mediterranean (EUNAVFORMED) Operation IRINI, the Joint Liaison Task Force Migrant Smuggling and Trafficking in Human Beings, EMPACT Operational Action Plan(s) and Operational Task Forces and Teams. This Action will endeavor to strengthen links and connections between the work of these networks, in order to establish channels of communication and exchange of information at the global level.

Europol will play a specific role and contribute to the project's implementation through targeted contributions (e.g., ad-hoc provision of expertise including expertise on gender and human-rights based approach through presentations, conference participation, and training activities), in particular in Morocco, Nigeria, Mauritania and Senegal.

Main counterparts in partner countries are border officials and investigators, Ministries of the Interior/Home Affairs, Ministries of Justice, Ministries of Foreign Affairs, General Prosecutor's Office, competent courts, UNTOC central authorities, liaison officials and liaison magistrates, and civil society organizations, including migrant representatives. Synergies will be sought with civil society formations and relevant intergovernmental platforms and networks, including whenever relevant and possible consultation with CSOs working on the protection of rights for women, children, migrants, refugees, persons with disabilities, LGBTIQ+ persons, etc.

The Action would work with partner countries' agencies mandated to investigate and prosecute SOM, as well as AML/CFT authorities to improve coordination and communication across all relevant agencies. The action will engage, in particular, with FIUs that disseminate financial intelligence and law enforcement agencies mandated to conduct parallel financial investigations into predicate offences including SOM as well as private sector partners and reporting entities that may identify the misuse of financial systems for SOM. In countries where FIUs are covered by other specialized initiatives, like SECFIN, the present Action will focus more on building skills and capacity of institutional bodies in charge of SOM to understand and include illicit financial flows in their approach and strategy, rather than equipping FIUs with SOM-related knowledge..

This Action will leverage existing relationships with other AML/CFT technical assistance providers as well as regional and international organizations including the FATF, FSRBs, IMF, World Bank and the Egmont Group to highlight the importance of addressing the financial element of SOM and to improve both informal and formal exchange of financial intelligence and evidence to support ongoing financing investigations and prosecutions.

The Action will coordinate with relevant EU Member States Technical Agencies and intergovernmental stakeholders working on the prevention and combatting the Smuggling of Migrants and promote a multi-stakeholder's approach and Team Europe Approach.

3 DESCRIPTION OF THE ACTION

3.1 Objectives and Expected Outputs

The **Overall Objective** of this Action is to counter migrant smuggling through evidence-based actions of following the money and addressing the digital dimension. Gender considerations will guide all areas of action to ensure that men and women in all their diversity benefit equally from, contribute to and participate in initiatives under this Action.

The **Specific(s) Objective(s)** of this action are:

1. Countries and relevant stakeholders are **better informed** about migrant smuggling routes, the financial market size, demand and digitally enabled aspects of the smuggling of migrants.
2. Relevant national authorities are better equipped and trained to identify and **track financial flows from migrant smuggling** and seize the proceeds of crime, such as virtual assets.
3. Relevant national authorities are better equipped and trained **to investigate and prosecute digitally-enabled migrant smuggling**,
4. Cross-regional and international cooperation and the sharing of practices is improved.

The Outputs to be delivered by this Action contributing to the corresponding Specific Objectives are:

(a) Contributing to Outcome 1 (or Specific Objective 1)

1.1 Analytical research brief to inform countries and relevant stakeholders about migrant smuggling routes, their drivers, the functioning and size of the illicit financial flows generated by them, and the digitally-enabled aspects of their functioning, to provide an updated and actionable situational picture.

1.2 Data collection, research and analysis on smuggling of migrants *modus operandi*, particularly aspects related to the misuse of technology, drivers and impacts, and the related financial flows, and dissemination to contribute to effective counter-smuggling and gender-sensitive responses.

(b) Contributing to Outcome 2 (or Specific Objective 2)

2.1 Increased capacity of law enforcement authorities and prosecutors handling migrant smuggling cases, as well as Financial Intelligence Units, to detect and trace illicit financial flows pertaining to migrant smuggling.

2.2 Enhanced coordination between FIUs, and law enforcement authorities / prosecutors handling migrant smuggling cases on processing financial evidence in partner countries

2.3 Strengthened cooperation and channels of communication, including information sharing, between private and public entities to address financial flows associated with SOM.

(c) Contributing to Outcome 3 (or Specific Objective 3)

3.1 Increased awareness on existing procedural and operational frameworks to address digital dimensions of the smuggling of migrants.

3.2 Enhanced skills of law enforcement authorities and prosecutors to detect, investigate and prosecute migrant smuggling through better application of existing national specialized techniques and methodologies applicable to digital aspects of migrant smuggling and with gender-sensitive approach.

3.3 Reinforced cooperation between public and private sector to counter digitally-enabled migrant smuggling.

(d) Contributing to Outcome 4 (or Specific Objective 4)

4.1 Improved cross-regional and international operational cooperation in criminal matters to address digitally-enabled smuggling and illicit financial flows related to SOM through a whole-of-the-route approach.

3.2 Indicative Activities

It is noted that some of the indicative activities listed below may not be implemented in all the target countries of the Action. The exact scope of the intervention in each target country and the related activities will be determined during

a 3-month inception period upon signature of the contract, in consultation with the partner countries and the European Union. Moreover, the design and implementation of activities under outcomes 2, 3 and 4 will be informed by and integrate the findings of research and analysis conducted under outcome 1 as they will be becoming available.

Indicative activities relating to Output 1.1

- Collection and analysis of national legislation and criminal justice data.
- Collection and analysis of irregular entries data
- Routine consultation with SOM investigators to map and analyze their methods and practices to address financial and digital elements of SOM.
- Publication of research brief on SOM financial flows, at thematic level but also country reports on selected countries.

Indicative activities relating to Output 1.2

- Develop and adapt qualitative and quantitative research methodologies.
- Train SOM Observatory team in the field.
- Collect gender-sensitive qualitative and quantitative Observatory data in the target countries.
- Analyze and triangulate collected Observatory data.
- Establishment of a Scientific Advisory Board.
- Produce and upload studies, research and policy briefs and other products based on the collected data and gender-specific findings on digital aspects of smuggling of migrants.

Indicative activities relating to Output 2.1

- Conduct an assessment of FIUs, LEAs, and prosecutors' capabilities to identify migrant smuggling and related financial / money laundering flows as identified by the Research Brief on SOM financial flows
- Design gender-responsive training curricula and materials on financial investigation techniques and detection of money laundering instances (including through cryptocurrency, Hawala and trade-based money operations) for law enforcement and judiciary authorities handling SOM cases, also incorporating the findings of the research and analysis on digital and financial dimensions of SOM under outcome 1.
- Develop a user-friendly toolkit for law enforcement agencies handling SOM cases, that would include guidelines, best practices, and checklists for identifying illicit financial flows and assets linked to smuggling networks.
- Deliver inter-agency workshops on financial investigation techniques and SOM identification to investigators and prosecutors handling SOM cases with the participation, where relevant, of FIUs.

Indicative activities relating to Output 2.2

- Hold country level roundtables to collect inputs from SOM analysts, investigators and prosecutors handling SOM cases, FIUs and financial institutions/service providers to jointly identify patterns, key modalities, typologies and red flag indicators of suspicious financial activity linked to SOM, making use of the findings of the research conducted under output 1.1.
- Design simulation exercises for FIUs, law enforcement, SOM analysts, investigators and prosecutors to practice asset identification, seizure and confiscation in a controlled, educational environment.
- Deliver simulation exercises.

Indicative activities relating to Output 2.3

- Support FIUs in each country to undertake outreach with reporting entities to promote compliance under law to report suspicious transactions linked to SOM.
- Organize a global conference to promote a common understanding of solutions that PPP and Financial Intelligence Sharing Partnerships can offer to address financial flows associated with SOM and measure progress made, taking into account the results of research and analysis conducted under outcome 1.
- Organize cross-regional conferences for countries along the same routes to discuss the challenges and achievements of processing financial information and parallel financial investigations conducted.
- Organize cross-regional trainings for FIUs and law enforcement agencies handling SOM cases to streamline the informal exchange of information and intelligence linked to financial dimensions of SOM ventures affecting the countries involved.

Indicative activities relating to Output 3.1

- Conduct mapping in the selected countries, informed by the activities under Output 1.2, of the procedural and operational framework related to the admissibility and use of digital evidence and special

investigative techniques related to migrant smuggling, and provide support, as required, to foster the use of digital evidence as per the existing operational framework.

- Provide support in the development of standard operating procedures, on detecting, investigating and prosecuting digitally-enabled migrant smuggling and in particular its prevalent forms, manifestations and modus operandi as they will emerge from activities under output 1.2.
- Training of Investigators, digital forensic analysts, prosecutors and judges to improve their technical knowledge and tools to investigate, trace and seize virtual assets linked to cases related to smuggling of migrants in close cooperation with existing projects building capacity of judiciary and law enforcement authorities in the area of digital investigations.
- Provision of hardware and software equipment to cybercrime units allowing for the increase of capabilities in the investigation and criminal analysis of migrant smuggling and the tracing of illicit flows of virtual assets related to it, including the training on the use of the equipment including the respect of rule of law and human rights standards.

Indicative activities relating to Output 3.2

- Mapping of curricula/programmes of relevant training bodies specializing in crime to determine the extent in which they cover digitally-enabled smuggling in order to mitigate duplication and promote integration of materials and activities covering digitally-enabled SOM in existing programmes.
- Training of first responders and front-line officers in charge of detection of migrant smuggling cases and interception of irregular migrants to effectively seize and handle mobile and electronic devices and extract electronic evidence respecting due process of law and informed by the activities conducted under output 1.2.
- Training of law enforcement units responsible for investigating migrant smuggling on cyber investigation techniques in the clear and dark web, including open-source intelligence (OSINT) and special investigative techniques to collect electronic evidence
- Training of prosecutors and investigating judges on cyber investigation techniques respecting rule of law and human rights, including aspects of electronic evidence and virtual assets
- Training of cybercrime experts and digital forensics analysts in the special features, approaches and methodologies of migrant smuggling investigations.
- Liaise with relevant training bodies and institutes to integrate in their curricula, as required, training modules and materials developed under the Action.

Indicative activities relating to Output 3.3

- Bilateral Meetings to foster informal cooperation mechanisms for collaboration between entities of the public (Government regulators, law enforcement authorities, criminal justice practitioners) and private sector (service providers, technology or employment companies) to improve collaboration and complementarity of actions within criminal justice responses, integrating the findings of research conducted under outcome 1.
- Organize operational actions involving law enforcement and prosecutors handling migrant smuggling cases, as well as representatives of the private sector and international agencies, to identify online platforms used to facilitate migrant smuggling and indicators of such criminal activity.

Indicative activities relating to Output 4.1

- Organize operational meetings for law enforcement and prosecutors handling migrant smuggling cases in countries affected by the same migrant smuggling flows to develop common understanding of issues at stake, formal and informal cooperation and common responses informed by the findings of activities under outcome 1 to counter digitally-enabled migrant smuggling and conduct efficient financial investigations.
- Organize cross-regional meetings between law enforcement officials and prosecutors to discuss practices in investigation and international cooperation in relation to digitally-enabled SOM and illicit financial flows related to SOM, also based on evidence and research gathered under outcome 1.

3.3 Mainstreaming

Environmental Protection & Climate Change

Climate change and environmental protection are key priorities of the work of the EU in International Partnerships, the Global Gateway strategy and focus area of many EU Delegations. The action will consider the nexus between

migrant smuggling and climate change. Learning from the findings of the 2022 UNODC's Policy Brief "Climate, Crime and Exploitation - the gendered links between climate-related risks and smuggling of migrants", the Action will try to embed and put in practice some of the recommendations identified.

As per OECD DAC Rio markers for climate this action is labelled as RM 0.

Outcomes of the SEA screening (relevant for budget support and strategic-level interventions)

The Strategic Environmental Assessment (SEA) screening concluded that no further action was required.

Outcomes of the EIA (Environmental Impact Assessment) screening (relevant for projects and/or specific interventions within a project). The EIA (Environment Impact Assessment) screening classified the action as Category C (no need for further assessment).

Outcome of the CRA (Climate Risk Assessment) screening (relevant for projects and/or specific interventions within a project). The Climate Risk Assessment (CRA) screening concluded that this action is no or low risk (no need for further assessment)

Gender equality and empowerment of women and girls

As per the OECD Gender DAC codes identified in section 1.1, this action is labelled as G1. This implies that the intervention will develop and implement a gendered approach to prevention and response to migrant smuggling.

The gender dimension of migrant smuggling remains understudied. In general, male migrants report significantly higher instances of forced labour, physical violence, and inhuman and degrading treatment during transit, including while being smuggled. On almost all migrant smuggling routes globally, men and boys comprise the majority of smuggled migrants. Men and boys also report a wider range of abuses than women. At the same time women and girls report a much higher exposure to sexual violence while being smuggled. It is often perpetrated as a form of retaliation for alleged misconduct, intimidation or coercion, or in the absence of other means, as a form of smuggling payment, where women and girls are coerced into providing sexual services to pay for transportation or bribes. Sexual violence is also perpetrated as a form of abuse with no purpose besides demonstration of power, misogyny, racism or sexual gratification. In many cases, it appears to have a financial dimension.

The Action will mainstream gender using [UNODC's Toolkit for mainstreaming human rights and gender equality into criminal justice interventions to address THB and SOM](#), developed under the EU-funded GLO.ACT project. This will help to (1) ensure that approaches to promote and support human rights and gender equality are mutually reinforcing and (2) facilitate a nuanced response to vulnerability, in which gender is considered along with a range of other inter-connected factors including: economic disparity; conflict and displacement; environmental factors; poverty; natural and manmade disasters; disability; and discrimination based on factors such as sex, age, ethnicity and social grouping.

All data collection, research and analysis activities carried out under the project will be disaggregated as far as possible according to gender, and relevant sociodemographic characteristics. The gendered implications of migrant smuggling, including its financial and digital aspects will be examined and explicitly taken into account in the research, data and analysis outputs of the project. As a standard monitoring practice, UNODC collects sex-disaggregated data in terms of its target groups. Pre- and post-activity evaluation questionnaires, used to assess impact of the activities, will be structured in a manner allowing disaggregation according to the gender of the respondent.

The Action will strive to (1) incorporate the gender-specific findings of research into training programs for policy makers, law enforcement officers, prosecutors and judges, (2) advocate for raising awareness of the strong operational advantages that increased inclusion of women brings to criminal justice teams, (3) support services that address the intersectional needs of different vulnerable groups, including those that are particularly vulnerable as a result of age, ethnicity and/or gender discrimination, (4) confront stigmatization of those who have faced sexual and other forms of exploitation. Activities will also take into account the patterns and root causes of all forms of gender-based violence, as well as the reporting bias by gender at investigation and prosecution stages.

Human Rights

At all stages, gender-responsive human rights-based approach principles of participation, non-discrimination/equality, accountability and transparency applying to all rights will guide the planning and implementation of the action. Data and information on potential human rights violations will be collected in the

context of the research activities of the project, and the privacy, confidentiality and safety of all research participants will be ensured through UNODC's research quality standards and research ethics. The human rights implications of data and research findings will be highlighted.

The Action will pursue a victim and migrant-centred, rights-based approach in line with the UNODC guidance note on the promotion of human rights. The HRBA (Human Rights Based Approach) underpins all aspects of the project's work and it is reinforced by the use of tools to assist staff in undertaking human rights and gender assessments. This approach is also in line with EU's renewed Action Plan against migrant smuggling which ensures the human rights of migrants. The human rights-based approach will underpin all aspects of the project's work and will be reinforced by the use of tools to assist staff in undertaking human rights and gender assessments.

Law enforcement officials are often the first point of contact for smuggled migrants and it is essential that they have the knowledge, skills and motivation to treat them in an appropriate, humane and gender-sensitive manner, taking into account their vulnerable state at all stages of the criminal justice process. Officials also need to be able to refer them to the correct services as required. This will involve close collaboration with other, noncriminal justice actors. Further, it is essential that victims of aggravated forms of migrant smuggling and witnesses be provided with protection and support in accessing justice, including through effective remedy and reparation. Specific modules for the protection of migrants' rights will be included in all capacity building activities provided in the framework of the project. Additionally, the project will seek to strengthen the protection of the rights of those subject to these criminal activities, in accordance with the SOM Protocol, including by promoting a legal framework compliant with the Protocol with respect to protection and assistance of smuggled migrants. The programme will mainstream protection to ensure that access to programme activities/services is provided on a safe, equal and fair basis and to prevent, reduce/mitigate and respond to the risks and consequences of violence, coercion, deliberate deprivation and abuse, in line with the European Commission guidelines on protection in humanitarian crises.

When it comes to the digital dimension of smuggling of migrants, the way investigations are carried out and the work related to equip and train national authorities with technology and capacities to exploit the use of it also raise human rights considerations and needs to adhere to certain standards. Key aspects of the work throughout the Action will include: a) Promoting [rights-based and gender equal approaches](#) to the investigation of SOM and related crimes throughout training, mentoring and equipment of beneficiary units and officials. b) Providing equipment with pre-installed technical features and limitations to ensure fit-to-purpose use and providing training and mentoring on the use of equipment integrating human rights considerations. c) Developing an understanding with partners that special investigation techniques and the use of IT equipment in investigations requires upholding legal and human rights standards to enable successful criminal prosecution and litigation. d) Advancing robust human rights protections within beneficiary institutions through the development and implementation of Standard Operating Procedures) Ensuring robust checks and balances in technical assistance work, through the implementation of the UN and UNODC human rights due diligence standards and the interaction with UN human rights mechanisms both in the concerned partner countries and HQ.

Disability

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D0. This implies that the action does not specifically target people living with disabilities. However, the benefits of the Action on stakeholders' capacities will have positive effects on people living with disabilities. There is an increased likelihood of abuse experienced by people with disability. As a result of pervasive stigma and stereotypes surrounding individuals with disabilities, smugglers, when possible, focus on individuals with disabilities as targets in their crime, thinking that they will be easier to control. Some risk factors that smugglers try to exploit may include gaps in education, societal isolation, and inadequate access to services and support. Furthermore, victims of aggravated smuggling may develop disabilities as a result of the hardship they endured during their journey or of abuse at the hands of their smugglers. Exposure to violence and coercive control has significant health consequences, including on cognitive development.²¹

The Action is in line with the Convention on the Rights of Persons with Disabilities (CRPD), the EU Strategy for the Rights of Persons with Disabilities 2021-2030, and the EU Guidance Note Disability inclusion in EU external action.

Conflict sensitivity, peace and resilience

There is a clear link between conflict and human mobility, including smuggling of migrants. Emergencies and conflict settings provide fertile ground for smugglers: in the absence of legitimate routes to escape danger, people fleeing

²¹https://www.unodc.org/documents/humantrafficking/2020/final_Female_victims_of_trafficking_for_sexual_exploitation_as_defendants.pdf

conflict often do not have other option than to resort to smugglers. The Action addresses the crucial issue of mutual legal assistance to combat migrant smuggling in partner countries. It will concentrate on building collaboration and partnerships among the participating countries at bilateral, regional, and international levels to combat migrant smuggling through a holistic and integrated approach the complex dynamics of SOM and associated crimes.

3.4 Risks

Category	Risks	Likelihood (High/ Medium / Low)	Impact (High/ Medium / Low)	Mitigating measures
External environment	Security and political stability in the partner countries, notably with respect to the risk of politization of migration	High	High	The Implementing Partner has strong partnerships with target countries and will maintain regular communication with key counterparts to allow for the identification of corrective measures, if needed, to ensure a smooth implementation of the project.
People and the organisation	Efforts to strengthen the response to migrant smuggling are undermined by corruption/complicity of government officials	High	Medium	The Implementing Partner will work closely with its anticorruption specialist staff to ensure that the development of programme activities considers (1) the likelihood of complicity, (2) its potential impact and (3) opportunities to mitigate the complicity and/or its impact.
People and the organisation	Low level of attention dedicated to, and low prioritization of, addressing migrant smuggling by the concerned national authorities, given the number of competing priorities in the partner countries	Medium	High	Targeted countries have already shown an adequate level of attention to the issue of migrant smuggling and have engaged with the Implementing Partner and other actors to respond to it. The Implementing Partner will work to ensure that the activities supported are in line with countries' priority needs. For example, while ensuring that programme focus is maintained UNODC will consider training requests that equip criminal justice practitioners with skills that are transferrable to other international crime types. This will also mitigate the potential impact of staff turnover (risk 4).
People and the organisation	Frequent turnover of officials limits the effectiveness of capacity building activities	High	High	The Implementing Partner will pursue a three-pronged strategy to address turnover: (1) discussions with counterpart countries with view to focusing training on staff likely to be in position for a minimum 2-3 years; (2) embedding of training in local institutions to facilitate wider coverage; and (3)

				as appropriate, integrating training into broader programmes, such as responding to all forms of organized crime, resulting in more officials with transferrable skills.
People and the organisation	Smuggled migrants are reluctant, or deliberately seek, to avoid engagement with authorities	High	High	(1) advocating for services that address the needs of smuggled migrants (2) advocating for firewall policies that allow migrants in need to come forward to authorities without fear of retribution, (3) training for front-line officials and other relevant staff likely to come into contact with smuggled migrants on victim-witness care and protection, including gender and cultural sensitivity and special measures for children, and (4) working to increase access to compensation if feasible.
External environment	Potential pandemic outbreaks might impact project implementation	Medium	Medium	The Implementing Partner has developed a set of remote capacity building and dialogue methodologies and tools, which proved to be effective in continuing project implementation. Majority of project activities can be implemented with adjusting methodologies. Additional communication channels, such as e-learning platforms and institutional focal points will also mitigate challenges posed by quarantine/ travel bans.
Planning, processes and systems	Insufficient or inadequate gender mainstreaming could reinforce gender inequalities and the non-realisation of human rights in the sector and hinder the efficiency and sustainability of the action.	Medium	High	Knowledge and tools of gender mainstreaming are available. Gender-sensitive monitoring, use of sex-disaggregated data, and gender-sensitive indicators. Gender mainstreaming is applied in all phases of the project cycle.
Communication and information	Lack of up-to-date data in the countries and at regional level	High	Medium	The Action will put an emphasis on supporting countries to undertake data collection and analysis on patterns and trends that could be used to inform policies and strategies, as well as in regular reporting mechanisms.
Planning, processes and systems	Lack of internal measures and mechanisms to avoid human rights abuses in	High	High	UNODC will include human rights standards and considerations in all trainings related to the use of technology and will support authorities to develop procedural and operational standards that consider mechanisms of reporting and protection against

	the targeted countries by the use of ICT tools and knowledge.			<p>abuse. Additionally, tools provided will be selected and customized to the needs of the country and their human rights compliance record.</p> <p>UNODC will also ensuring robust monitoring of human rights compliance in technical assistance work, through the implementation of the UN and UNODC human rights due diligence standards.</p>
Planning, processes and systems	Overlapping between activities implemented by different implementing agencies (both EU and non-EU funding)	Medium	Medium	Early mapping / identification of overlapping activities and discussion with other implementing agencies to guarantee coordination and synergies (process that is expected to be facilitated by the TEI on IFF-TOC which is an EU coordination forum for IFF related actions in Africa)

3.5 The Intervention Logic

The underlying intervention logic of the Action is that:

IF data collection, analysis and reporting on migrant smuggling in partner countries, including on smugglers' modus operandi and digitally-enabled aspects, related financial flows, and drivers and impacts of the crime are conducted **AND IF** a comprehensive and actionable research brief is produced and disseminated to States and stakeholders, **THEN countries and relevant stakeholders are better informed about migrant smuggling routes, financial market size, drivers and digitally-enabled aspects of the smuggling of migrants (Specific Objective 1).**

IF LEAs, prosecutors and financial intelligence units are trained to detect and trace illicit financial flows pertaining to migrant smuggling; **IF** there is enhanced coordination between these same stakeholders on processing financial evidence, and **IF** there is strengthened cooperation and channels of communication between public and private entities on the same topics, **THEN relevant national authorities will be equipped to better identify and track financial flows from migrants smuggling and seize the proceeds of crime, such as virtual assets (Specific Objective 2).**

IF awareness on existing procedural and operational frameworks to address the technological dimensions of migrant smuggling is increased, **IF** LEAs and prosecutors are provided with trainings on special investigative approaches and methodologies applicable to the digital aspects of migrant smuggling -enabled crimes **AND IF** cooperation is reinforced between the public and private sector to counter digitally-enabled migrant smuggling, **THEN relevant national authorities will be equipped to better investigate and prosecute digital-enabled migrant smuggling, (Specific Objective 3).**

IF cross-regional and international conferences and meetings on criminal matters to address digitally-enabled smuggling and illicit financial flows related to SOM are facilitated, **THEN cross-regional and international cooperation and the sharing of practices will be improved (Specific Objective 4).**

IF countries and relevant stakeholders are provided with accurate information about the digitally-enabled aspects of migrant smuggling through robust data analysis and research, **IF** relevant government authorities and other stakeholders are equipped to better trace illicit financial flows and seize the proceeds of crime, **IF** relevant government authorities and other stakeholders are equipped to better investigate and prosecute the digitally-enabled aspects of migrant smuggling, including through strengthened coordination and cooperation **AND IF** there is improved cross-regional and international stakeholders through the adoption of a uniform, whole-of-the-route approach, **THEN partner countries can effectively counter migrant smuggling, particularly the digital and financial aspects of the crime. (Overall Objective)**

3.6 Logical Framework Matrix

PROJECT and BUDGET SUPPORT MODALITIES						
Results	Results chain (a): Main expected results (maximum 10)	Indicators (a): (at least one indicator per expected result)	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Impact To counter migrant smuggling through evidence-based actions of following the money and addressing the digital dimension	Contributed to countering migrant smuggling through increased and improved investigations of : <ul style="list-style-type: none"> • Migrant smuggling (overall) • Digitally enabled migrant smuggling • Tracing the illicit financial flows of migrant smuggling 	1. Number of SOM cases investigated by assisted countries (total) 2. Number of SOM cases investigated by assisted countries by either tracing illicit financial flows or addressing the digitally enabled aspects of the crime	1. To be determined during the inception stage 2. To be determined during the inception stage	1. To be determined at inception 2. To be determined at inception	Data from UNODC's GLOTIP report and national statistics provided to UNODC by partner countries (through follow-up questionnaires)	<i>Not applicable</i>
OUTCOMES						
Outcome 1 Countries and relevant stakeholders are better informed about migrant smuggling routes, the financial market size, demand and digitally enabled aspects of the smuggling of migrants	1. Countries and relevant stakeholders are <i>better informed</i> about SOM, including the digitally-enabled and financial aspects.	1.1 Number of stakeholders briefed on research 1.2. Number of stakeholders citing the use of research to bolster national responses to address the digitally-enabled and financial aspects of SOM	1.1. Zero 1.2. Zero	1.1. At least 10 stakeholders in each partner country 1.2. At least 70 per cent of the stakeholders briefed in partner countries (aggregate figure)	1.1. Project monitoring/attendance list of participants 1.2. End -of-briefing surveys, follow up questionnaires, and focus groups with key national stakeholders	Partner countries are able and willing to use research findings to develop more effective institutional and national responses

Outcome 2 Relevant national authorities are better equipped and trained to better identify and track financial flows from migrant smuggling and seize the proceeds of crime, such as virtual assets.	2.Relevant national authorities are better equipped and trained to identify and track financial flows from migrant smuggling and seize the proceeds of crime.	2.1. Percentage of trained stakeholders, disaggregated by sex, indicating application of training content/knowledge to better identify and trace financial flows from migrant smuggling and seizing the proceeds of crime 2.2. Examples from partner countries of knowledge application in better identifying and tracing financial flows from migrant smuggling and/or seizing the proceeds of crime (qualitative indicator)	2.1. Zero 2.2. Zero 2.3. Zero	2.1. At least 80% of stakeholders responding to the pre and post training surveys 2.2. One example from at least 5 partner countries	2.1. Pre and post-training surveys 2.2. Focus group discussions with a sample of trained practitioners from partner countries (qualitative indicator)	There is institutionalisation of skills and knowledge related to identifying and tracking related financial flows and seizing the proceeds of crime.
Outcome 3 Relevant national authorities are better equipped and trained to better investigate and prosecute digitally enabled migrant smuggling	3.Relevant national authorities are better equipped and trained to investigate and prosecute digitally enabled migrant smuggling.	3.1. Percentage of trained stakeholders, disaggregated by sex, indicating application of training content/knowledge to better investigate and prosecute digitally enabled migrant smuggling 3.2. Examples from partner countries of knowledge application in better investigating and prosecuting digitally enabled migrant smuggling (qualitative indicator) 3.3. Number of training bodies and institutes supported by UNODC, integrating UNODC produced training modules and materials into their curricula 3.4 List of equipment procured and related training carried out	3.1. Zero 3.2. Zero 3.3. Zero	3.1. At least 80% of stakeholders responding to the pre and post training surveys 3.2. One example from at least 5 partner countries 3.3 At least 2 training entities supported	3.1. Pre and post-training surveys 3.2. Focus group discussions with a sample of trained practitioners from partner countries (qualitative indicator) 3.3 Project monitoring and learning system	There is political and/or institutional commitment to pursue the necessary steps to develop and/or strengthen national policies and legal frameworks against digitally enabled SOM.

Outcome 4 Cross-regional and international cooperation and sharing of good practices is improved	4.Cross-regional and international cooperation and sharing of good practices is <i>improved</i> .	4.1. Number of instances of international, regional and/or bilateral cooperation on criminal matters related to addressing digitally enabled SOM, and/or financial aspects of the crime 4.2. Number of States reporting instances of international, regional and/or bilateral cooperation on criminal matters related to addressing digitally enabled SOM, and/or financial aspects of the crime	4.1. To be determined at the inception stage 4.2. To be determined at the inception stage	4.1. At least four instances of cooperation overall 4.2. At least 5 States supported through this project report instances of cooperation	4.1. Mission reports Key informant interviews with a sample of stakeholders representing partner States. 4.2. Mission reports Key informant interviews with a sample of stakeholders representing partner States.	Partner countries are willing and committed to cooperate on criminal matters related to addressing cyber-enabled smuggling and tracing illicit financial flows
OUTPUTS (for an action implemented as a project)						
Output 1 relating to outcome 1 Analytical research brief on smuggling of migrants' financial flows to inform countries and relevant stakeholders about migrant smuggling routes, financial market size and dynamics to provide an updated and actionable situational picture.	1.1 Analytical research brief on SOM financial blows to inform countries and relevant stakeholders <i>produced</i> .	1.1.1 Research brief on smuggling of migrants' financial flows published (milestone indicator)	1.1.1. 0	1.1.1 Research brief to be published by July 2026 in the relevant languages	1.1.1. Project monitoring and learning system	The research findings are validated by all concerned stakeholders

Output 2 relating to outcome 1 Data collection, research and analysis on smuggling of migrants <i>modus operandi</i> , including particularly aspects related to the misuse of technology, drivers and impacts, and the related financial flows, and dissemination to contribute to effective counter-smuggling responses	1.2. Data collection, research and analysis on smuggling of migrants <i>modus operandi</i> , including particularly aspects related to the misuse of technology, drivers and impacts, and the related financial flows, and dissemination to contribute to effective counter-smuggling responses <i>conducted</i> .	1.2.1 Number of key informants, disaggregated by sex and country, interviewed 1.2.2 Number of experts consulted to provide input on research drafts and materials 1.2.3 Criminal justice data collected and validated (milestone indicator)	1.2.1 0 1.2.2 0 1.2.3 N/A	1.2.1 At east 10 key informants interviewed in each country 1.2.2 At least 10 key experts consulted to provide input 1.2.3. Criminal justice data collected and validated according to project workplan	1.2.1 Research raw data/interview transcripts 1.2.2 Research raw data/interview transcripts 1.2.3 Project monitoring and learning system.	Respondents and stakeholders are willing to share accurate information on the smuggling of migrants
Output 1 relating to outcome 2 Increased capacity of law enforcement authorities and prosecutors handling migrant smuggling cases, as well as, prosecutors and Financial Intelligence Units, to detect and trace illicit financial flows pertaining to migrant smuggling.	2.1 Capacity of law enforcement authorities and prosecutors handling migrant smuggling cases, as well as, prosecutors and Financial Intelligence Units, to detect and trace illicit financial flows pertaining to migrant smuggling <i>increased</i> .	2.1.1 Percentage of trained stakeholders, disaggregated by sex, indicating increase in knowledge and technical capacity to better detect and trace illicit financial flows pertaining to migrant smuggling 2.1.2 Number of law enforcement authorities, prosecutors and FIUs trained, disaggregated by sex and stakeholder type, to detect and trace illicit financial flows pertaining to migrant smuggling 2.1.3. Number of training materials, toolkits and assessments produced, incl. with gender-sensitive approach	2.1.1. 0 2.1.2. 0 2.1.3. 0	2.1.1 At least 80% of stakeholders responding to the pre and post training surveys 2.1.2 At least 100 officials trained in four partner countries 2.1.3. At least 2 training materials, toolkits and assessments produced	2.1.1. Pre and post-training surveys 2.1.2 List of participants; training activity reports 2.1.3 Project monitoring and learning system	Assisted partner countries are committed to acknowledge and address the need for improved capacities on tracing and monitoring illicit financial flows. Partner countries nominate qualified officials to participate in training activities.
Output 2 relating to outcome 2 Enhanced coordination between FIUs and law enforcement authorities / prosecutors handling migrant smuggling cases on processing financial evidence in partner countries	2.2 Coordination between FIUs and law enforcement authorities / prosecutors handling migrant smuggling cases on processing financial evidence in partner countries <i>is enhanced</i> .	2.2.1 Number of stakeholders, disaggregated by sex and country, attending roundtables aimed at strengthening coordination in relation to processing financial evidence 2.2.2 Number of stakeholders, disaggregated by sex and country, attending simulation exercised delivered for FIUs and prosecutors	2.2.1 0 2.2.2 0	2.2.1. At least 50 participants 2.2.2 At least 80 participants	2.2.1 List of participants; activity/mission reports 2.2.2 List of participants; activity/mission reports	LEAs, FIUs and prosecutors in partner countries effectively engage in discussions on identifying and processing good-quality financial evidence.

Output 3 relating to outcome 2 Increased cooperation and channels of communication, including information sharing, between private and public entities to address financial flows associated with SOM.	2.3. Cooperation and channels of communication, including information sharing, between private and public entities to address financial flows associated with SOM <i>increased.</i>	2.3.1 Percentage of trained FIU stakeholders and law enforcement agencies, disaggregated by sex, reporting knowledge increase on handling the financial aspects of SOM crimes				
		2.3.2 Number of FIU stakeholders, disaggregated by sex and country, trained on handling the financial aspects of SOM crimes	2.3.1 0	2.3.1. At least 80 % of stakeholders responding to the pre and post surveys	2.3.1 Pre/post surveys 2.3.2 List of participants; activity/mission reports	FIUs are willing to engage in establishing channels of communication and developing risk mitigation strategies to address illicit financial flows.
		2.3.3. Number of FIUs supported to undertake outreach with reporting entities to promote compliance under the law to report suspicious SOM-linked transactions	2.3.2 0	2.3.2 At least 50 participants trained	2.3.3 Project monitoring and learning system	FIUs and partner countries are able to identify effective channels of communication and appropriate risk mitigation strategies to address illicit financial flow
		2.3.4 Number of stakeholders benefitting from global and cross-regional conferences to promote a collective understanding of processing financial information, as well as of solutions like PPP and financial intelligence-sharing to address illicit financial flows linked to SOM	2.3.3. 0	2.3.3 At least 2 FIUs supported	2.3.4 List of participants; activity/mission reports	
			2.3.4 0	2.3.4 At least 40 stakeholders benefitting from global and cross-regional conferences		

Output 1 relating to outcome 3 Increased awareness on existing procedural and operational frameworks to address the digital dimensions of the crime of smuggling of migrants.	3.1. Awareness on existing procedural and operational frameworks to address the digital dimensions of the crime of smuggling of migrants <i>increased</i> .	3.1.1. Number of SOPs developed or provided input on	3.1.1 0	3.1.1. At least 3 SOPs updated	3.1.1. Project monitoring and learning system	There is political and/or institutional commitment to and active engagement by partner countries Partner countries appoint suitable officials for implementation of key institutional processes such as standard operating procedures and use of hardware and software to address digitally-enabled SOM.
		3.1.2. Number of countries supported with hardware and software equipment	3.1.2 0	3.1.2. At least 6 countries	3.1.2. Project monitoring and learning system reports	
		3.1.3. Percentage of trained stakeholders (that is, investigators, prosecutors, digital forensic analysts and judges), disaggregated by sex, indicating increase in knowledge and technical capacity to better investigate and prosecute digitally enabled migrant smuggling	3.1.3. 0	3.1.3. At least 80 % of stakeholders responding to the pre and post surveys	3.1.3 Pre and post training surveys	
		3.1.4 Number of stakeholders trained, disaggregated by sex, to use hardware and software equipment provided for the investigation and criminal analysis of migrant smuggling	3.1.4 0	3.1.4 At least 40 persons trained	3.1.4 List of participants; activity/mission reports	
Output 2 relating to outcome 3 Enhanced skills of law enforcement authorities and prosecutors to detect, investigate and prosecute migrant smuggling through better application of existing national specialized techniques and methodologies applicable to digital technology aspects of migrant smuggling to cybercrime	3.2 Skills of law enforcement authorities and prosecutors to detect, investigate and prosecute migrant smuggling through better application of existing national specialized techniques and methodologies applicable to digital technology aspects of migrant smuggling to cybercrime <i>enhanced</i> .	3.2.1. Percentage of trained stakeholders (that is, first responders, LEAs, prosecutors, judges and cybercrime experts), disaggregated by sex, indicating increase in knowledge and technical capacity to use specialised techniques including producing and handling electronic evidence	3.2.1 0	3.2.1 At least 80 % of stakeholders responding to the pre and post surveys	3.2.1 Pre and post training surveys	There is political and/or institutional commitment to and active engagement by partner countries to pursue the necessary steps to participate in consultative and decision-making processes against digitally-enabled SOM. Partner countries nominate qualified officials to participate in trainings against digitally-enabled SOM
		3.2.2 Number of stakeholders trained, disaggregated by sex, to use specialised techniques, including producing and handling electronic evidence	3.2.2 0	3.2.2 120 stakeholders	3.2.2 List of participants; activity/mission reports	
		3.2.3 Number of training bodies and institutes consulted with, to integrate UNODC produced training materials into their respective curricula	3.2.3 0	3.2.3 At least 4 training bodies and institutes	3.2.3 Project monitoring and learning system	

Output 3 relating to outcome 3 Reinforced cooperation between public and private sector to counter digitally-enabled migrant smuggling.	3.3. Cooperation between public and private sector to counter digitally-enabled migrant smuggling is <i>reinforced</i> .	3.3.1 Number of bilateral meetings to foster informal cooperation mechanisms between public and private practitioners held 3.3.2 Number of stakeholders, disaggregated by stakeholder type, benefitting from operational actions	3.3.1 0 3.3.2 0	3.3.1 At least two bilateral meetings 3.3.2 At least 40 stakeholders	3.3.1 List of participants; activity/mission reports 3.3.2 List of participants; activity/mission reports	Public and private entities are willing to cooperate on criminal justice matters There are limited operational barriers to public private partnerships in relation to cooperation on digitally enabled smuggling
Output 1 relating to outcome 4 Improved cross-regional and international operational cooperation in criminal matters to address digitally-enabled smuggling and illicit financial flows related to SOM	4.1 Cross-regional and international operational cooperation in criminal matters to address digitally-enabled smuggling and illicit financial flows related to SOM is <i>improved</i> .	4.1.1 Number of stakeholders (LEAs and prosecutors), disaggregated by sex, benefiting from operational and cross-regional meetings conducted to share good practices on investigating and prosecuting digitally-enabled SOM 4.1.2 Number of operational and cross-regional meetings conducted to promote sharing of good practices on digitally enabled SOM.	4.1.1 0 4.1.2 0	4.1.1 60 stakeholders 4.1.2. 4 operational and cross-regional meetings	4.1.1 List of participants; activity/mission reports 4.1.2 List of participants; activity/mission reports	Partner countries are willing and committed to cooperating on criminal justice matters related to digitally-enabled migrant smuggling.

4 IMPLEMENTATION ARRANGEMENTS

4.1 Financing Agreement

In order to implement this action, it is not envisaged to conclude a financing agreement with the partner country

4.2 Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is 60 months from the date of adoption by the Commission of this Financing Decision.

Extensions of the implementation period may be agreed by the Commission's responsible authorising officer by amending this Financing Decision and the relevant contracts and agreements.

4.3 Implementation Modalities

The Commission will ensure that the EU rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures.²²

4.3.1 Indirect Management with an entrusted entity

This action may be implemented in indirect management with the United Nations Office on Drugs and Crime - UNODC.

The envisaged entity has been selected using the following criteria

- Important norm-setter in the field of organized crime, corruption and drugs.
- UNODC performs functions of secretariat for the Conference of the Parties (CoP) to the United Nations Convention Against Transnational Organized Crime (UNTOC), including its three protocols thereto (against trafficking in persons, smuggling of migrants and trafficking in firearms), and the Conference of the States Parties (CoSP) to the UNCAC. As such, it is also tasked with supporting the implementation review mechanisms of both conventions.
- Long track record in conducting actionable research on Smuggling of Migrants globally, using state-of-the-art, innovative methodologies and producing landmark publications such as the First Global Study on Smuggling of Migrants (2018) and the web-based platform [UNODC Observatory on Smuggling of Migrants](#) that collects and disseminates data, information and analysis on SOM.
- Experience in implementing technical assistance interventions on combatting laundering of proceeds of crime derived from THB and SOM, under which UNODC created information channels of cooperation and communication and produced several technical documents and knowledge products, manuals and guidelines for national authorities that served as reference for professionals and practitioners in this field.
- Expertise in delivering operational capacity-building to counter digitally-enabled crimes in 120 UN Member States, through the provision of strategic policy advice, promotion of international cooperation and strategic advancements in awareness raising. Over the years, UNODC's efforts in this area have expanded, now spanning across regions including Western Africa, Eastern Africa, Southeast Asia and the Pacific, Central Asia, South America, Central America, and Mexico. This regional presence has allowed UNODC to develop a deep understanding of the manifestations of digitally-enabled crimes and nuances of cybercrime response globally.
- Experience and track record managing international cooperation programmes in the area of migration management and smuggling of migrants at the global level, operational capacity to identify key

²² www.sanctionsmap.eu. Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

stakeholders (e.g. in judiciary, police), to have access to and mobilise expertise to address specific capacity building activities, capacity to generate data for the proper implementation of the Action.

- Experience of successful implementation of global, regional and national EU-funded actions targeting human trafficking and migrant smuggling across diverse regions of the World.

The implementation by this entity entails that the action will contribute to accelerate progress towards SDG10.7 through convening stakeholders and providing pilot activities on crucial aspects of the smuggling of migrants with a solid monitoring, evaluation, and learning framework that will benefit and complement EU bilateral and regional support fighting Smuggling networks.

In case the envisaged entity would need to be replaced, the Commission's services may select another replacement entity using the same above criteria

4.3.2 Changes from indirect to direct management mode (and vice versa) due to exceptional circumstances (one alternative second option)

If the implementation modalities in indirect management cannot be implemented due to circumstances outside of Commission's control, alternative implementation modalities in direct management may be considered.

4.4 Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply.

The Commission's authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realisation of this action impossible or exceedingly difficult (Article 28(10) NDICI-Global Europe Regulation).

4.5 Indicative Budget

	2025
Indicative Budget components	EU contribution (amount in EUR)
Implementation modalities – cf. section 4.3.1 Indirect management with UNODC	
Objective 1 Countries and relevant stakeholders are better informed about migrant smuggling routes, the financial market size, demand and digitally enabled aspects of the smuggling of migrants	1 200 000
Objective 2 Relevant national authorities are better equipped and trained to identify and track financial flows from migrants smuggling and seizing the proceeds of crime, such as virtual assets	5 900 000
Objective 3 Relevant national authorities are better equipped and trained to investigate and prosecute digitally-enabled migrant smuggling	6 900 000
Objective 4 Cross-regional and international cooperation and the sharing of practices is improved	1 000 000
Evaluation – cf. section 5.2 Audit – cf. section 5.3	may be covered by another Decision
Totals	15 000 000

4.6 Organisational Set-up and Responsibilities

A Project Steering Committee will be established, composed of representatives of the European Commission and UNODC as well as relevant EU services. This Steering Committee is to ensure the overall coherence of the Action, acting as the highest governance structure and providing political guidance.

The Project Steering Committees will be responsible for tracking progress of the project, documenting lessons learned and ensuring they are applied to the Action. The Steering Committee will indicatively meet at least twice a year, in Brussels or remotely. The Steering Committee will also be responsible for all project decision-making that impacts the project, such as the necessity to make changes to the project given changing contextual circumstances, to extend the project, or seizing new opportunities for engagement with key stakeholders.

As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in the above governance structures set up for governing the implementation of the action and may sign or enter into joint declarations or statements, for the purpose of enhancing the visibility of the EU and its contribution to this action and ensuring effective coordination.

5 PERFORMANCE MEASUREMENT

5.1 Monitoring and Reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (Outputs and direct Outcomes) as measured by corresponding indicators, using as reference the logframe matrix (for project modality).

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

Roles and responsibilities for data collection, analysis and monitoring:

The implementing partner will be responsible for monitoring and reporting on indicators of the logframe matrix, including the collection of baselines and data collection in the inception phase of the Action.

All monitoring and reporting shall assess how the action is considering the principle of gender equality, human rights-based approach, and rights of persons with disabilities including inclusion and diversity. Indicators shall be disaggregated at least by sex.

5.2 Evaluation

Having regard to the nature of the action, a final evaluation may be carried out for this action or its components via independent consultants contracted by the Commission. It will be carried out for accountability and learning purposes at various levels (including for policy revision), taking into account in particular the fact that this action needs to be complementary and coordinates with many other EU-funded projects and has also an important component linked to equipment. All evaluations shall assess to what extent the action is taking into account the human rights-based approach as well as how it contributes to gender equality and women's empowerment and disability inclusion. Expertise on human rights, disability and gender equality will be ensured in the evaluation teams.

The Commission shall inform the implementing partner at least 15 days in advance of the dates envisaged for the evaluation missions. The implementing partner shall collaborate efficiently and effectively with the evaluation experts and inter-alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

The evaluation reports may be shared with the partners and other key stakeholders following the best practice of evaluation dissemination. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, apply the necessary adjustments.

The financing of the evaluation may be covered by another measures constituting a Financing decision.

5.3 Audit and Verifications

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements.

6 STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

The 2021-2027 programming cycle will adopt a new approach to pooling, programming and deploying strategic communication and public diplomacy resources.

In line with the 2022 “[Communicating and Raising EU Visibility: Guidance for External Actions](#)”, it will remain a contractual obligation for all entities implementing EU-funded external actions to inform the relevant audiences of the Union’s support for their work by displaying the EU emblem and a short funding statement as appropriate on all communication materials related to the actions concerned. This obligation will continue to apply equally, regardless of whether the actions concerned are implemented by the Commission, partner countries, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU member states.

However, action documents for specific sector programmes are in principle no longer required to include a provision for communication and visibility actions promoting the programmes concerned. These resources will instead be consolidated in Cooperation Facilities established by support measure action documents, allowing Delegations to plan and execute multiannual strategic communication and public diplomacy actions with sufficient critical mass to be effective on a national scale.