

# Developing a new sanctions regime to counter migrant smuggling and human trafficking

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## INTRODUCTION

Despite almost 178,000 detections in 2025, marking a 26% decrease in irregular border crossings compared to 2024,<sup>1</sup> the situation at Europe's borders remains uncertain. Ongoing conflicts, geopolitical instability and persistent socio-economic pressures in countries of origin continue to sustain demand for smuggling services, which are often provided by organised crime networks.<sup>2</sup> These criminal groups have expanded significantly in scale, geographic reach and operational sophistication in recent years, often operating within broader illicit ecosystems that include document fraud, trafficking in human beings, financial crime and money laundering.<sup>3</sup> Their activities generate substantial profits while exposing migrants to severe risks, including exploitation, violence and life-threatening journeys.

At the same time, migrant smuggling has become embedded in a broader context of EU and UK security concerns. In recent years, migration flows have, in some cases, been deliberately instrumentalised by hostile state actors. For example, Russia and Belarus have been accused of facilitating the movement of migrants towards EU borders as part of hybrid strategies aimed at destabilising the EU and its neighbouring member states.

In response, the EU, the UK and international partners have intensified their domestic agendas and bilateral and multilateral cooperation to disrupt migrant smuggling networks. Policy responses include enhanced cooperation with countries of origin and transit, strengthened law enforcement operations against smugglers (with 13,500 arrests of migrant smugglers in the EU in 2024),<sup>4</sup> and the exploration of new policy tools such as targeted sanctions regimes against individuals

and entities involved in migrant smuggling and human trafficking. Notably, the UK introduced the world's first dedicated Global Irregular Migration and Trafficking in Persons Sanctions Regime in July 2025.<sup>5</sup> Meanwhile, the EU has announced plans at a high political level<sup>6</sup> to develop its own dedicated regime, with proposals already submitted and negotiations underway.

## BACKGROUND

Targeted sanctions against migrant smugglers and traffickers are considered a complementary instrument to traditional law enforcement approaches. Compared with criminal prosecution, sanctions can be imposed more rapidly and with greater flexibility given that they rely on a lower evidentiary threshold. This allows authorities to take actions, such as imposing financial restrictions and travel bans, to disrupt criminal networks before criminal prosecution is possible. In some cases, sanctions may be applied instead of a full criminal trial.

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Sanctions strategies targeting smugglers and traffickers should differ from traditional State-oriented sanctions, as illicit smuggling markets are highly adaptive, decentralised and increasingly global.<sup>7</sup> These characteristics enable criminal networks to reorganise quickly in response to enforcement pressure, meaning sanctions alone are unlikely to eliminate them entirely. Nevertheless, targeted sanctions can contribute to disruption and deterrence within illicit markets in several ways: by weakening criminal ecosystems through repeated and strategic designations; by shaping behaviour within illicit markets through increasing the financial, legal and reputational risks associated with involvement in smuggling activities; and by publicly exposing hidden actors, facilitators and financial flows within criminal networks.<sup>8</sup>

At the same time, the use of sanctions against migrant smuggling remains relatively new and limited in scope, and evidence of their effectiveness is still scarce.<sup>9</sup> To date, such sanctions have been primarily applied under broader organised crime regimes by the UN (e.g., in Libya and Mali) as well as by the US, the UK and the EU. The UK's introduction of a dedicated and geographically flexible sanctions regime represents a recent and innovative approach that allows for quicker action against smugglers operating across multiple jurisdictions. Analysis of this regime can provide valuable policy insights into sanctions' design, their interaction with criminal justice mechanisms and potential implementation challenges, which could inform the development of similar frameworks by other partners.

## STATE OF PLAY

### *Evolving EU policy perspective to combat migrant smuggling*

Combatting migrant smuggling has become a high-priority issue on the EU's political agenda and a key focus in the fight against serious and organised crime.<sup>1</sup> There is also a growing shift toward a broader strategic approach that treats migrant smuggling not only as a migration management challenge but as part of a wider organised crime and security agenda.<sup>10</sup> As a result, addressing it requires increased cross-cutting coordination across multiple policy instruments, including migration policy, law enforcement cooperation, border management, international partnerships and foreign policy tools such as sanctions. The strategic policy shift is reflected in legislative modernisation, institutional strengthening, reinforced global partnerships and a possible sanctions regime (see BOX 1).

As part of this broader agenda, the Commission is also considering a **new global sanctions regime** targeting migrant smuggling and traffickers' networks worldwide,<sup>11</sup> intended to complement criminal justice tools. Its aim will be to freeze assets, restrict mobility and dismantle the economic foundations of smuggling networks.

The EU has already used sanctions as a foreign policy tool against certain criminal activities, but such a dedicated sanctions framework against migrant smuggling would be a first for the EU. Existing restrictive measures have been applied only indirectly through other sanctions regimes,

### BOX 1. EU'S BROADER AGENDA ON COMBATING MIGRANT SMUGGLING

- ▶ **Legislative modernisation:** the EU is updating the 2002 Facilitators Package through a revised Facilitation Directive,<sup>12</sup> which is currently being negotiated. The revision aims to strengthen the targeting of organised smuggling networks by focusing on acts committed for financial or material gain and to improve the harmonisation of criminal penalties across member states. It also proposes higher penalties for serious offences, particularly those that endanger lives, such as dangerous maritime smuggling operations, while introducing clearer safeguards to prevent the criminalisation of humanitarian actors aiding migrants in distress.
- ▶ **Institutional strengthening:** In 2025, the EU reinforced the mandate of the EU's Law Enforcement Agency, Europol, to enhance support for member states in combating migrant smuggling and human trafficking. This includes improved information sharing, increased coordination with agencies such as the EU's Border and Coastguard Agency, Frontex, and the EU's Agency for Criminal Justice Cooperation, Eurojust, and the enhancement of Europol's European Migrant Smuggling Centre (EMSC), supported by additional staff and resources.
- ▶ **Global partnerships:** In 2023, the EU launched the Global Alliance to Counter Migrant Smuggling, endorsed by over 50 international partners and structured around the shared goals of preventing smuggling activities, enforcing anti-smuggling responses and promoting alternatives to irregular migration. The initiative includes substantial financial commitments (including approximately €130 million for counter-smuggling actions and more than €400 million for legal migration initiatives)<sup>13</sup> and cooperation with partner countries and international organisations. The possible use of targeted sanctions against migrant smugglers and human traffickers has also been put on the agenda of the G7 countries.<sup>14</sup>

<sup>1</sup> Key recent initiatives include the Global Alliance to Counter Migrant Smuggling (launched in November 2023), the European Asylum and Migration Management Strategy (January 2026) and the Pact on Migration and Asylum, expected to become fully operational in June 2026. Migrant smuggling is also one of the EU's priorities in the fight against serious and organised crime as part of the European Multidisciplinary Platform Against Criminal Threats EMPACT 2026-2029.

such as those addressing human trafficking, organised crime or the instrumentalisation of migration by third countries. For instance, the EU Global Human Rights Sanctions Regime can target trafficking in human beings and human rights abuses committed by migrant smugglers, but these listings are framed specifically in terms of human rights violations associated with such activities, limiting the sanctioning of activities as such.

In addition, geographically focused regimes have been used in specific contexts: sanctions related to Libya address human rights' abuses linked to smuggling networks; sanctions concerning Myanmar have addressed trafficking linked to scam compounds (types of 'factories', e.g. in South Asia, where people are paid to engage in attempted scams); and the Syria sanctions regime has been used against narcotics' smuggling, particularly the trafficking of Captagon; and the Belarus and Russia sanctions regimes have targeted the instrumentalisation of migrants.

EU member states (e.g., France, Italy, the Netherlands, Spain) have also put in place national measures against migrant smuggling and human trafficking crimes, including asset seizure, financial investigations and administrative enforcement under domestic law. However, these tools are generally implemented through criminal justice and anti-money laundering frameworks rather than through dedicated sanctions regimes.

As a result, the current framework remains fragmented, geographically limited or narrowly defined. This could in the future constrain the EU's ability to react swiftly and effectively on emerging migration smuggling networks and other security threats. This has led to growing support among EU institutions and certain member states for a new horizontal, coordinated, EU-level sanctions regime designed specifically to fill this gap.<sup>15</sup>

Such a framework would be geographically agnostic and designed primarily to target migrant smuggling and trafficking in human beings globally. However, its final scope and parameters are still being negotiated by member states. Although migrant smuggling and human trafficking will be its core focus, discussions are ongoing regarding the potential inclusion of additional organised crime activities, such as drug trafficking or firearms smuggling.<sup>16</sup> As with all EU sanctions regimes, its adoption would require unanimity among member states.

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The design and further implementation of this sanctions regime would require significant cooperation between foreign policy actors responsible for sanctions and law enforcement authorities working on migration and organised crime, both at the EU- and member state-levels. Practically, it must align target identification and prioritisation, share operational intelligence, coordinate the sequencing of sanctions and criminal investigations, and monitor the impact of listings, ensuring that sanctions complement existing law enforcement tools rather than operate separately.

#### *The UK sanctions regime: An innovative approach*

Irregular migration and migrant smuggling remain significant security and political challenges for the United Kingdom, particularly along routes across the English Channel. It puts sustained pressure on border management and asylum systems while generating considerable political and public concern. Countering migrant smuggling has therefore become a UK policy priority. In 2025, there were 46,497 detected arrivals via main routes, representing a 7% increase compared to the previous year.<sup>17</sup> The vast majority of these arrivals (around 89%) were linked to small boat crossings across the English Channel, highlighting the central role of organised smuggling networks in facilitating irregular entry to the UK.

As part of its broader 'disrupt, deter, return' strategy<sup>18</sup> to tackle irregular migration globally, the UK adopted the Global Irregular Migration and Trafficking in Persons (Sanctions) Regulations 2025 under the Sanctions and Anti-Money Laundering Act 2018 in July 2025.<sup>19</sup>

The regime allows the UK to designate individuals and entities involved in migrant smuggling and human trafficking, including smuggling network leaders, logistics' providers, financial facilitators and actors engaged in the instrumentalisation of migration for the purposes of destabilisation.

The key features of the UK regime<sup>20</sup> include:

- ▶ **Global scope:** Allowing designations irrespective of location and hitting smuggling networks around the globe. It is not intended to target specific countries or individual migrants.
- ▶ **Targets:** It targets going beyond individual smugglers and aims to disrupt the ecosystem of companies found to be enabling their activities.
- ▶ **Main tools:** Asset freezes, travel bans and director disqualification measures, which prevent designated individuals and entities from access to funds, entry to the UK or participation in the management of UK companies.
- ▶ **Application:** The requirements and prohibitions apply to all "UK persons", including British nationals and entities and companies established in the UK, including its overseas branches. All of them are prohibited from dealing with funds or resources of designated persons.

- ▶ **Information and reporting obligations:** Certain UK companies (such as banks and other financial institutions) are also required to conduct due diligence on partners, screen against the UK sanctions' list, report suspicions promptly and maintain compliance systems to prevent breaches.
- ▶ **Enforcement and penalties:** A breach of financial sanctions is a serious criminal offence that is triable and carries a maximum sentence, on indictment, of seven years of imprisonment or a fine (or both).

Implementation and enforcement are shared between the Foreign, Commonwealth & Development Office (FCDO), which determines sanctions' policy and designations, and the Office of Financial Sanctions Implementation (OFSI) within HM Treasury, which oversees implementation and enforcement. The UK's regime also relies on close cooperation between the FCDO and the National Crime Agency and other authorities responsible for organised crime and border security, ensuring that sanctions' designations are informed by operational intelligence and complement ongoing criminal investigations against smuggling networks. The Secretary of State manages appropriate engagement with relevant law enforcement and prosecution authorities.<sup>21</sup>

Sanctions can be imposed based on "reasonable grounds to suspect" involvement in sanctionable activity as the evidentiary criteria for designating a person or entity. While this is significantly lower than the criminal law standard of "beyond reasonable doubt",<sup>22</sup> authorities are still obliged by the law to possess credible information or intelligence that provides a solid factual basis for the suspicion.<sup>23</sup>

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as hawala operators (who are involved in an informal, trust-based system of transferring money without the physical movement of cash through traditional banks). The second package has focused on a key corridor for people smuggling to the UK through the Western Balkans route, listing Balkan-based criminal groups and gang leaders, as well as international financiers for their role in supporting people-smugglers, including the ALPA Trading FZCO.<sup>24</sup> All targets have been publicly named and barred from engaging with the UK financial system.

As the UK sanctions regime is relatively recent, its long-term impact is yet to be assessed. It forms part of a broader policy toolkit aimed at addressing irregular migration, which includes strengthened border surveillance, enhanced law enforcement cooperation with France<sup>25</sup> and partnerships with countries of origin and transit to deter irregular migration and facilitate returns. The overall effectiveness of the regime will therefore depend on how sanctions are coordinated with and reinforce these broader measures.

## RECOMMENDATIONS

A dedicated sanctions regime can significantly disrupt criminal networks when they target the broader criminal ecosystem, are integrated into a broader enforcement architecture combining financial intelligence, criminal investigations and international cooperation, cooperate with private sector and civil society and are aligned with broader migration policies. The main recommendations for the future EU sanctions' framework dedicated to migrant smuggling include:

### 1. Target the broader criminal ecosystem

Sanctions targeting migrant smuggling and human trafficking should go beyond individual smugglers and address the broader criminal ecosystem that enables these activities, including financial intermediaries, logistics and transport providers, and document facilitators.<sup>26</sup> Migrant smuggling networks frequently rely on informal financial systems (such as hawala systems) to move funds, commercial transport networks to move migrants, and specialised forgery networks to enable cross-border mobility. Targeting them through sanctions could disrupt key operational services, increase the risks associated with facilitating smuggling activities and weaken the resilience of criminal networks. Just as important is to systematically map digital enablers, including cryptocurrencies, blockchain transfers, encrypted communications and online marketplaces used to advertise services, coordinate operations and move funds. Moreover, the sanctions regime should also incorporate continuous monitoring and communication strategies, as well as adaptive designation mechanisms to deter criminal networks from relocating operations or shifting activities to new actors or geographic areas.<sup>27</sup>

## **2. Use sanctions as a complement to criminal justice, not a substitute**

The effectiveness of a counter-smuggling sanctions regime depends on institutionalised cooperation between foreign policy and law enforcement authorities. Sanctions should be embedded in a coordinated operational framework involving the European Commission, the European External Action Service (the EEAS), Europol, Eurojust and Frontex, with clear sequencing and interaction between sanctions' designations and criminal investigations. This approach should follow the principle of complementarity, ensuring that each instrument reinforces the other without creating operational risks. For example, information from criminal investigations may provide the evidentiary basis for the "statement of reasons" supporting sanctions' designations, while public announcements should not compromise sensitive, ongoing criminal proceedings. Integrating foreign policy decision-making, criminal intelligence and financial enforcement mechanisms can ensure that sanctions reinforce investigations and disrupt smuggling networks and their supporting ecosystems.

## **3. Enhance cooperation with countries of origin and transit**

Experience from sanctions targeting transnational organised crime shows that the effectiveness of restrictive measures often depends on cooperation with law enforcement and financial authorities in the countries where criminal networks operate.<sup>28</sup> Collaboration with host country authorities, such as police, financial intelligence units and judicial bodies, can significantly enhance enforcement by facilitating intelligence sharing, coordinated investigations, identification of targets. For a potential EU sanctions regime, enhanced cooperation with authorities in key origin and transit countries, particularly across North Africa, the Middle East and the Western Balkans, would be essential for its effectiveness.

## **4. Strengthen cooperation with private sector actors**

Enhancing cooperation with private sector actors, including financial institutions, online platforms and transport companies, is essential for gathering intelligence and detecting sanctions' violations, suspicious transactions, logistical patterns or digital activities linked to smuggling networks. The future EU regime should support the development of compliance frameworks for smuggling-related sanctions, improve information sharing between public authorities and the private sector, and promote targeted regulatory outreach to strengthen awareness and compliance. It should also leverage and expand initiatives such as the Europol Financial Intelligence Public Private Partnership (EFIPPP) to better identify financial facilitators and support investigations aimed at dismantling smuggling operations.<sup>29</sup>

## **5. Engage civil society organisations (CSOs)**

Civil society organisations (CSOs) can play an important role in the development and monitoring of the future sanctions regime, identifying smuggling networks, and assessing and communicating the impact of sanctions.<sup>30</sup> To leverage this expertise, the EU and its member states should establish dedicated and integrated mechanisms for receiving and analysing civil society reporting, modelled on existing human rights sanctions' frameworks.<sup>31</sup> These should include intake channels for investigative research and open-source intelligence (OSINT) as well as structured consultation forums allowing CSOs to provide evidence relevant to potential designations and support the mapping of smuggling networks.

## **6. Employ a comprehensive strategic approach to address the structural drivers of smuggling**

Research suggests that only about 6% of migrants are directly influenced by smugglers to leave, with most migration decisions shaped by conflict, insecurity or poverty long before contact with a smuggler occurs.<sup>32</sup> Consequently, the impact of sanctions will remain limited unless they are integrated into a broader EU agenda that includes comprehensive migration policies, strengthened partnerships with third countries and the expansion of legal migration pathways. Sanctions should therefore be communicated not as a standalone solution, but as one strategic tool within a broader approach aimed at reducing systemic reliance on smuggling networks by addressing the socioeconomic and security conditions that these criminal actors exploit.

## **7. Enhance member states' operational capacity and cooperation**

Operational coordination and enforcement capacity of the EU member states are decisive and should be further strengthened. This should include developing clear operational guidance for member states on the implementation of the new regime, increasing support from EU agencies to strengthen member states' digital and financial investigative capabilities for tracing illicit financial flows and detecting sanctions violations, and reinforcing Joint Investigation Teams (JITs) to enhance cross-border investigations on migrant smuggling networks<sup>33</sup> through real-time evidence sharing and coordinated investigative action.

## **8. Strengthen strategic cooperation with the UK and other international partners**

As many smuggling routes directly connect the EU and the UK and smuggling networks operate across both jurisdictions, systemic partnerships and coordination between the EU and UK on designations and the enforcement of sanctions is

crucial for sanctions' effectiveness and countering their circumvention. The UK's experience of the first dedicated sanctions regime can also provide useful lessons for the EU and other countries. The possible areas for EU-UK collaboration should include: regular exchanges of expertise and best practices in the design, enforcement and compliance of sanctions and private sector engagement; strategic discussions between the EEAS and FCDO and possible coordinated or parallel listings where feasible;

enhanced information sharing and engagement with EU agencies like Europol, especially on 'follow-the-money' investigations and disruption of digital infrastructure used by smuggling networks, including cryptocurrency and online platforms; aligning strategic narratives and diplomacy efforts with third countries along smuggling routes, coordinating action within broader initiatives such as the G7, the EU's Global Alliance to Counter Migrant Smuggling or other global frameworks.

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