

# Action Knowledge Transfer on Migrant Smuggling and Trafficking by Air and Document Fraud

---

March 2019

Clara Alberola  
Chiara Janssen



**Maastricht Graduate School of Governance (MGSoG)**



## Table of Contents

List of Tables.....	3
List of Figures .....	4
List of abbreviations .....	5
Acknowledgements .....	6
Executive summary .....	7
<b>Part 1: Presentation of the study .....</b>	<b>10</b>
1. Introduction .....	10
2. Objectives and methodology.....	12
2.1. Methodological approach .....	12
2.2. Methodological reflections.....	15
3. The EU perspective: irregular entries at EU air borders .....	16
3.1. Recent trends of smuggling by air detections at Schiphol airport.....	16
3.2. Recent trends in smuggling by air at all EU air borders .....	17
3.3. The modi operandi of smuggling by air .....	19
3.4. The role of document fraud .....	22
3.5. Combatting migrant smuggling by air and document fraud: the Dutch expertise .....	25
ECID .....	25
Dedicated Gate Control .....	26
EU Police cooperation.....	26
<b>Part 2: Background review and legislative mapping of selected partner countries.....</b>	<b>27</b>
4.1. Morocco.....	27
4.1.1. Migrant Smuggling in, through and from Morocco .....	28
4.1.2. Smuggling networks in Morocco .....	30
4.1.3. Trafficking of migrants by air from Morocco to Europe .....	31
4.1.4. Document fraud .....	32
4.1.5. Policy, legislative and institutional frameworks.....	33
4.2. Nigeria.....	38
4.2.1. Migrant Smuggling .....	39
4.2.2. Trafficking in human beings by air.....	42
4.2.3. Document fraud .....	44
4.2.4. The Role of corruption.....	45
4.2.5. Policy and institutional frameworks .....	46
4.3. India .....	49
4.3.1. Overview of migrant smuggling in India .....	49
4.3.2. Modus operandi of smugglers and characteristics of smuggling networks .....	52

4.3.3. Trafficking in human beings by air .....	53
4.3.4. Document fraud .....	54
4.3.5. Policy and institutional frameworks .....	54
<b>Part 3: Fieldwork findings</b> .....	60
5.1. Morocco .....	60
5.1.1. Trends in smuggling and trafficking by air and document fraud .....	60
5.1.2. Main challenges of air border management: preliminary needs assessment .....	64
5.2. Nigeria .....	66
5.2.1. Trends in smuggling, trafficking by air and document fraud .....	66
5.2.2. Main challenges of air border management: preliminary needs assessment .....	69
5.2.3. Best practices .....	71
5.3. India .....	72
5.3.1. Trends in smuggling, trafficking by air and document fraud .....	72
5.3.2. Main challenges of air border management: needs assessment .....	77
6. Conclusions .....	82
<b>Part 4: Operational and policy recommendations</b> .....	83
Operational recommendations for partner countries .....	83
Policy recommendations .....	86
Addressed at the European Union and EU Member States border security agencies .....	86
<b>References</b> .....	88
Annex 1. Interview guides .....	101
Annex 2. List of organizations and stakeholders interviewed .....	109
Annex 3. OSCE Overview of the use of Advanced Passenger Information (API).....	113

## List of Tables

Table 1. Overview of partner country interviews .....	14
Table 2. Irregular entries reported at EU air borders by selected airports of origin .....	18
Table 3. Irregular entries reported at selected airports of transit.....	18
Table 4. Main airports of embarkation .....	19
Table 5. Price list of document fraud equipment .....	25
Table 6. Morocco's key legislation on human trafficking .....	36
Table 7. Morocco's key legislation on the smuggling of migrants .....	37
Table 8. Morocco's key legislation on document fraud .....	37
Table 9. Nigeria's key law responses to trafficking in persons .....	46
Table 10. Key Nigerian legislation on the smuggling of migrants .....	47

Table 11. Key Nigerian legislation on document forgery and counterfeiting .....	48
Table 12. Estimated costs of irregular migration from India to various destinations (USD) .....	51
Table 13. Indian national legislation to prohibit human trafficking.....	55
Table 14. Indian national legislation to prevent human smuggling.....	54
Table 15. Indian national legislation against document fraud.....	57
Table 16. Challenges and Recommendations Nigeria .....	83
Table 17. Challenges and Recommendations Morocco.....	84
Table 18. Challenges and recommendations India.....	84

## List of Figures

Figure 1. Facilitators and irregular migrants detected at EU air borders.....	11
Figure 2. Document fraud detection at Dutch air borders (2008-2017).....	22
Figure 3. Interpol typology of document fraud (Interpol, 2017) .....	23
Figure 4. Document fraud techniques at EU air borders 2015-2017.....	24
Figure 5. International migrant stocks in and from Morocco by year (1990 – 2015) .....	27
Figure 6. MTM map on mixed migration routes (2014) .....	29
Figure 7. International migrant population in and from Nigeria by year (1990 – 2015).....	39
Figure 8. Details of CMN airport.....	60
Figure 9. Moroccan Landing Card Form .....	64
Figure 10. API and PNR systems .....	64
Figure 11. LOS Airport details .....	66
Figure 12. IOM’s Migration Information and Data Analysis System .....	69
Figure 13. An anti-corruption sign located next to the document check desk at Abuja airport.....	71
Figure 14. DEL Airport details .....	71

## List of abbreviations

Action Knowledge Transfer	AKT
Airline Liaison Officer	ALO
Advance Passenger Information System	APIS
Anti-Human Trafficking Units	AHTU
Border Crossing Point	BCP
Border Management Information System	BIMS
Bureau of Immigration	BoI
Common Agenda for Migration and Mobility	CAMM
Convention on the Elimination of All Forms of Discrimination Against Women	CEDAW
Dedicated Gate Control	DGC
Direction Générale de la Surveillance Nationale (English: General Directorate of National Security)	DGSN
Direction of Migration and Border Surveillance	DMSF
Document Fraud Units	DF Units
Economic and Financial Crimes Commission	EFCC
Economic Community of West African States	ECOWAS
European Police Office	Europol
European Union	EU
Expertise Centre Identity Fraud and Documents	ECID
Federal Airport Authority of Nigeria	FAAN
Foreigner Registration Office	FRO
Immigration Liaison Officer	ILO
Immigratie- en Naturalisatiedienst (English: Immigration and Naturalization Services)	IND
Independent Corrupt Practices Commission	ICPC
Internal Security Fund	ISF
International Centre for Migration Policy Development	ICMPD
International Organization	IO
International Organization for Migration	IOM
Koninklijke Marechaussee	KMar
Maastricht University	UM
Migration Information and Data Analysis System	MIDAS
Ministry of External Affairs	MEA
Ministry of Home Affairs	MHA
Modus Operandi	MO
Mobility Partnership	MP
National Agency for the Prohibition of Trafficking in Persons	NAPTIP
National Drug Law Enforcement Agency	NDLEA
Nigerian Immigration Service	NIS
Nigerian Drug Law Enforcement Agency	NDLEA
Passenger Name Record	PNR
Quarterly Review	QR
Regional Schengen Cooperation Officer	RSCO
Schengen Information System	SIS
Trafficking in Human Beings	THB
Training of Trainers	ToT
United Nations Office on Drugs and Crime	UNODC
Union Territory	UT
Victims of Human Trafficking	VOT

## Acknowledgements

This report is authored by Clara Alberola and Chiara Janssen, Research Officers at the Maastricht Graduate School of Governance, Migration and Development research group. The authors are grateful for the guidance and support of Prof. Dr. Melissa Siegel and Sarah Langley, and the work of Vittorio Bruni and Rufus Horne. The UM team would like to extend its gratitude to the practitioners of the Koninklijke Marechaussee, in particular to Henk Kooij and Robert Hartland of the Expertisecentrum Identiteitsfraude en Documenten en ID-desks (ECID).

## Executive summary

The European Union's Mobility Partnership (MP) and Common Agenda for Migration and Mobility (CAMM) are multilateral cooperation instruments aimed at enhancing migration governance. The Action Knowledge Transfer on Smuggling and Trafficking by Air is an action aimed at contributing to one of the four priorities of the MP and CAMMs; the fight against irregular migration and trafficking in human beings. In particular, the action investigates the characteristics of smuggling and trafficking by air through and from three selected partner countries; India, Morocco and Nigeria. This research-action is carried out by the University of Maastricht, in partnership with the practitioners of the Dutch Royal Military Police (Koninklijke Marechaussee or KMar). The objectives of the action are threefold:

- Objective 1: Developing a more detailed picture of the characteristics of smuggling by air trends and modus operandi in India, Morocco and Nigeria and gain a deeper understanding of the existing and needed institutional capacity to address migrant smuggling by air and document fraud.
- Objective 2: Fostering knowledge sharing and capacity development regarding best practices and lessons learned in addressing migrant smuggling by air and document fraud.
- Objective 3: Informing policy makers both in the EU and in partner countries on the gaps in capacity, knowledge, equipment and resources that currently exist within efforts to tackle migrant smuggling by air and document fraud, in order to better tailor relevant policy and programming.

To fulfil these objectives, the researchers conducted a total of 49 in-depth interviews with experts and practitioners in the EU as well as in Nigeria, Morocco and India. This report presents the main findings on the scale, trends and modus operandi of smuggling by air towards the EU and the main challenges of air border management at the airports of the selected partner countries.

- **Main trends in smuggling and trafficking by air: scale, routes and modi operandi**

As compared to irregular entries by land and sea, smuggling by air remains relatively limited in its scale. According to Frontex, from 2014 to 2017, there were on average 5,000 detections of document fraudsters and facilitators per year at all EU airports. **The overall number of apprehensions decreased by 33% between 2014 and 2017.** Smuggling and trafficking by air is limited in scale but not negligible; law enforcement agents at airports deal with fraudulent documents and smuggling cases on a near daily basis. **In the EU, the airports of Dublin, London, Paris and Rome reported the highest numbers of detections, with between 1,600 and 4,000 detections reported per airport for the period 2015-2017.** Detections peak during the summer, the busiest time for EU airports.

The airports of Istanbul and, to a lesser extent, the airports of Dubai and Casablanca were reported as being important transit hubs in air routes. Irregular migrants from South Asia often transit through the airports of the Gulf States and Istanbul, while irregular migrants from West Africa can transit through Casablanca. Istanbul airport seemed to be used as an air transit hub in irregular travels for nationals of Iraq, Iran and Syria, among others. It is important to note that the air journey is often one segment of a longer smuggling journey that combines air, land and/or sea. In that sense, **EU experts reported that the largest air smuggling trend in 2017 and 2018 was that of asylum seekers in Greece using fraudulent documents (mainly the impostor method) to travel by air from Athens and smaller Greek islands towards Northern EU countries.**

There is a variety of *modi operandi* used for smuggling by air, and these change rapidly according to authorities' reaction. For instance, irregular travellers could be using EU airports as 'claimed' points and remain at the EU airport instead of connecting to the alleged destination. In other cases, facilitators arrange the 'swapping' of identity documents and boarding passes in the airport transit areas. In the majority of cases, irregular migrants travel directly from airport A to B with the use of fraudulent documents or genuine documents fraudulently obtained.

- **The role of document fraud**

**Smuggling by air is intrinsically connected to document fraud.** Both EU and partner country experts presented a variety of document fraud techniques used. Facilitators and irregular migrants use forged, counterfeit or genuine passports and visas. **Recently, the most commonly used technique is the impostor method; travellers present a document that is genuine, contains a genuine visa or a genuine residence permit,** but which is in fact not theirs. As detection technologies and the quality of travel documents improve, the act of forging or altering data on a passport or a visa becomes increasingly difficult. Therefore, the business of 'renting out' genuine passports –the same passport is used several times by different people– is currently thriving.

**An important and rising trend in document fraud happens 'upstream', during the visa application process.** Experts interviewed in partner countries explain that genuine visas fraudulently obtained might be the most commonly used way to travel irregularly. In countries like India or Morocco, agents organize fake visa applications for high fees in which prospective migrants get fake supporting documents such as bank statements, letters of employment, certifications etc.

- **Air border security challenges in selected partner countries**

The three countries in focus present very different realities in smuggling trends and air border security. In Nigeria, smuggling and especially trafficking by air towards the Gulf States and the EU used to happen at high rates. With the introduction of biometric passports and growing border management capacity among authorities present at the airports, these trends have been curtailed. However, there remain important challenges to tackle in order to fully eradicate this phenomenon. **The results show that there is a need for digitalized border data management systems, a better electricity and internet infrastructure, better coordination of the various law enforcement agencies present at Lagos and Abuja airport and stronger anti-corruption policies.** The Nigeria Immigration Services as well as the National Agency against Trafficking in Persons are being proactive in cooperating with international actors and improving their human and material capacities.

In the case of Morocco, it remains difficult to ascertain the scale of smuggling by air. The airport of Casablanca could be, however, a point of arrival for victims of trafficking as well as migrants who aim to continue their journey irregularly towards the EU. **Similar to the case of Nigeria, Morocco has the potential to improve their air border data management systems.** The country is currently studying the introduction of Advance Passenger Information (API) and Passenger Name Record (PNR) systems. According to liaison officers, the main challenges in Morocco are information exchange and police cooperation. Working on these two aspects is essential in order to better tackle transnational organized crimes of smuggling and trafficking by air.

**In India, the biggest challenge underlying smuggling by air is that of genuine visas fraudulently obtained and the issue of visa-shopping.** In many cases, prospective migrants use agencies that engage in fraudulent activities, whether voluntarily or without being aware of it. These agencies might build up fraudulent visa application files containing fake supporting documents. Irregular travellers often seem to be destined to North America or the UK, and use the Gulf States and/or Schengen area as transit



points. Similar to the case of Morocco, liaison officers reported important obstacles in information exchange with Indian authorities and police cooperation around New Delhi airport. At the airport, airlines play an important role in border security; some have established extra screening and document check procedures.

# Part 1: Presentation of the study

---

## 1. Introduction

This research-action analyses the main characteristics, developments and modus operandi of migrant smuggling and trafficking at airports and its links with document fraud. While there is a large and up-to-date body of literature about the scale, routes and modus operandi of migrant smuggling by land or by sea, comparatively little is established as to the basic facts of smuggling by air. There are multiple understudied elements of migrant smuggling by air, including the routes used, the networks involved, the fees paid by participants, the profits gained, the use of fraudulent documents, and the various links to other types of crime. This report aims to shed light on some of these elements in the context of the EU air borders.

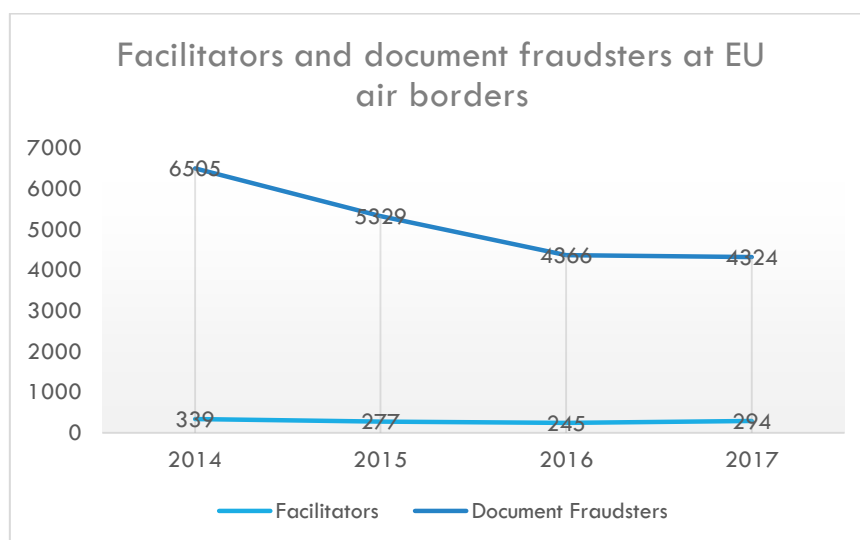
First, the report analyses the trends of smuggling by air towards the EU on the basis of qualitative information collected in a series of interviews with smuggling and document fraud experts of the Koninklijke Marechaussee (KMar) at Amsterdam Schiphol airport, as well as recent quantitative data provided by Frontex.

Secondly, the study presents the characteristics of smuggling by air and the challenges of air border management in selected MP and CAMM countries, namely Morocco, Nigeria and India. The Mobility Partnership between Morocco and the EU signed in 2013, as well as Common Agenda for Migration and Mobility (CAMM) with Nigeria (2015) and India (2016) feature the prevention and fight against irregular migration and the eradication of human trafficking as some of their main priorities for action. The country reports serve as a preliminary needs-assessment on the situation of smuggling by air and as a basis for further action. In that sense, the third part of the report focuses on policy and operational recommendations addressed at EU stakeholders and at the partner countries' stakeholders.

In its 2016 report on migrant smuggling, EUROPOL notes that while air facilitation is currently less commonly used than other methods, it is likely to become more popular in response to increased land and sea border controls. It is still too early to affirm whether smuggling by air to the EU will rise. Also, the number of document fraudsters detected at all EU air borders has been declining since 2014.

As shown in Figure 1 below, apprehensions of document fraudsters at EU air borders have decreased from 6,505 in 2014 to 4,324 in 2017, showing a 33% decrease. The number of migrant smugglers detected at EU airports however, has remained stable with on average 288 arrests per year. It is important to note that this data does not reflect the exact number of apprehensions, due to data reporting issues in different EU member states. Indeed, as highlighted throughout the report, better data management on smuggling by air is necessary both at the EU and partner country level in order to have a clear overview of this phenomenon.

FIGURE 1. FACILITATORS AND IRREGULAR MIGRANTS DETECTED AT EU AIR BORDERS



Source: Frontex, 2018

Despite these difficulties, smuggling by air remains minor in comparison to smuggling by land and sea (Frontex, 2017; Frontex, 2018). In contrast to crossings overland and by sea, migrant smuggling by air is more sophisticated and expensive. A United Nations Office on Drugs and Crime (UNODC) study (2015) reports that smuggling by air from India to Europe costs above 15,000\$ and the costs rise to more than 30,000\$ for smuggling by air into North America. Migrant smuggling by air also requires smuggling organizations capable of providing migrants with high-quality travel documents to pass through airport border controls; whether these are false, counterfeit, forged or look-a-like passports and visas (UNODC, 2018).

Document fraud is indeed an integral part of smuggling by air. The document fraud technique employed by smugglers varies greatly through time and geographical context. With the democratization of biometric documents across the world, forgery and counterfeiting becomes increasingly difficult. As a result, experts have noticed a rise in other document fraud techniques such as the impostor method (the use of a document corresponding to another person) or genuine documents fraudulently obtained. As will be explained in more detail in the next sections, different document fraud techniques are used to different degrees in each of the selected partner country.

Similar to document fraud, the general modus operandi of smuggling by air varies significantly. Facilitators and irregular migrants may use large international air hubs such as Schiphol as a 'claimed' transit point, where they deliberately miss the connecting flight to a visa-free country, or change their final destination at the transit point. One recurring pattern in smuggling by air is the fact that it often represents a segment of a larger smuggling journey that is combined with other legs by land and sea (UNODC, 2018).

All in all, smuggling by air is more or less pervasive depending on the efficacy of air border management at different airports. Preventing smuggling and trafficking of migrants by air is possible through efficient and adaptive air border management configurations. While most EU airports have very high standards in border management, experts note that some vulnerabilities persist. In the case of Morocco, Nigeria or India, there remain important challenges in border management which are related to document fraud expertise, infrastructure, data management and police cooperation, among others.

## 2. Objectives and methodology

The general objective of this action is **to support cooperation and knowledge sharing in tackling migrant smuggling by air and document fraud in India, Morocco and Nigeria, in line with the priorities of the MP and CAMMs between the EU and the selected partner countries.** Specifically, the MP and CAMMs signed with the target countries of this action call for a need to prevent and combat irregular migration, migrant smuggling and trafficking, and transnational organized crime, as well as enhancing information exchange and cooperation between the EU and partner countries through evidence-based and policy-relevant research. Thus, the *Action Knowledge Transfer on Smuggling and Trafficking by Air and Document Fraud* has three main objectives:

- Objective 1: Developing a more detailed picture of the characteristics of smuggling by air trends and modus operandi in Nigeria and gain a deeper understanding of the existing and needed institutional capacity to address migrant smuggling by air and document fraud
- Objective 2: Fostering knowledge sharing and capacity development regarding best practices and lessons learned in addressing migrant smuggling by air and document fraud.
- Objective 3: Informing policy makers both in the EU and in partner countries on the gaps in capacity, knowledge, equipment and resources that currently exist within efforts to tackle migrant smuggling by air and document fraud, in order to better inform and tailor relevant policy and programming.

### 2.1. Methodological approach

The action took place in the three following phases, each corresponding to a specific methodology:

- Phase 1 – Inception, desk review and EU experts interviews
- Phase 2 – Implementation of the “fact-finding” fieldwork missions
- Phase 3 – Analysis of the primary data and validation workshops with experts

**In accordance with Objective 1, the activities conducted in Phase 1 consisted of a preparatory desk review** in order to produce a legislative and policy mapping on smuggling by air and document fraud for each of the selected partner countries. As such, the researchers conducted systematic literature reviews on the relevant institutional, legal and policy landscapes. In addition, to provide a broader overview of the phenomenon, quantitative data on irregular entries at EU air borders was requested from Frontex and subsequently analysed. It is important to note that **the study focused primarily on arrivals at Amsterdam Schiphol Airport**, but not exclusively. An overview of the type of sources consulted during the preparatory desk review is provided below:

- International organizations reports on smuggling, trafficking and document fraud
- Academic literature on migrant smuggling and trafficking
- National legislation
- National policy documents
- Press releases and news articles
- Frontex’ yearly Africa intelligence reports
- Eurostat data on irregular entries at EU borders
- Frontex data on irregular entries at EU air borders

After completion of the country background reports, and in preparation of the fieldwork missions, **the research team conducted a first-round of interviews with EU and Dutch experts.** This first round of interviews was designed to obtain practical and technical expertise that would serve for the country's needs-assessment. More importantly perhaps, it provided an overview of the challenges of smuggling and trafficking by air from an EU perspective.

**A total of 22 first-stage interviews were conducted, 15 of which with Dutch Law enforcement practitioners from the Koninklijke Marechaussee (KMar) and the Immigration and Naturalization Services (IND) and 7 with international experts and academics** (see Annex 2). A semi-structured interview guide addressed at EU experts (Annex 1) was designed around the actions' main research questions:

- R1: What are the main trends in migrant smuggling and trafficking via air routes?
- R2: What is the scale and modus operandi of smuggling and trafficking by air to the EU?
- R3: What is the role of document fraud in migrant smuggling and trafficking by air?
- R4: What are the main challenges of air border management in Nigeria, Morocco and India? What are the main gaps in institutional and technical capacity?
- R5: What are some of the best practices and lessons learnt in combatting smuggling and trafficking at EU airports?

**In accordance with objectives 1 and 2, activities within Phase 2 revolved around the implementation of the needs-assessment missions** to Nigeria, Morocco and India. Specifically, Maastricht University officers carried out missions to each partner country with the purpose of engaging in discussions with a variety of stakeholders to gain a more comprehensive understanding of the current trends and characteristics relating to migrant smuggling by air and document fraud, as well as to learn about the resources, equipment and human capital currently available to address the phenomena in the selected partner countries. The semi-structured interviews gave Maastricht University and KMar a better idea of the challenges faced by partner countries and what appropriate recommendations would be to more effectively counter migrant smuggling by air and document fraud. This information has been incorporated into the final action outputs in Phase 3.

Initially, the needs-assessment missions were envisaged as **'knowledge-sharing' missions** and were planned to take place in participation with Dutch Liaison Officers. This would have allowed to collect country-specific technical and financial insights and the opportunity to set up inter-governmental information exchange on air border management. For practical reasons developed in the next section, KMar country liaison officers could not take place in the missions, which restricted the access to the pool of stakeholders interviewed and the extent to which technical information could be gathered.

The needs assessment missions were set up in order to gather as much information on current trends of smuggling and trafficking by air and the existing gaps in institutional and technical capacity to combat it. An interview guide addressed specifically at partner countries stakeholders was designed beforehand. **When possible, the UM researchers visited the international airports with either national law enforcement officers or other stakeholders.** This was made possible, to a certain extent, at the airports of Abuja, Lagos and New Delhi. The UM researchers also obtained relevant information through EU Member States' Liaison Officers based in the partner countries. Between 8 and 10 interviews took place in each country, which amounts to a total of 27 interviews. Due to the sensitivity of the topic as well as the limited partner country cooperation, the majority of interviews took place with international stakeholders rather than partner country authorities, as depicted in Table 1 below.

Fieldwork was conducted in each of the partner countries on the following dates:

- Nigeria (Abuja and Lagos): 27-31 August 2018
- Morocco (Rabat): 3-7 September 2018
- India (New Delhi): 5-12 September 2018

TABLE 1. OVERVIEW OF PARTNER COUNTRY INTERVIEWS

Category	Number of interviews (N participants)		
	Nigeria	Morocco	India
Partner Country Law Enforcement Actors	4(13)	1	1
EU Member State Actors in partner country, IOs or Airlines	4	8(10)	9
Total	8(17)	9(11)	10

To fulfil objective 3, phase 3 revolved around the analysis of the primary data collected throughout the fieldwork missions. **All 49 interviews** -from both the first stage interviews as well as the country missions- were transcribed and then systematically coded to address each of the research questions. Once answers were identified for each of the research questions, the data was analysed for emerging themes and a coding frame was developed accordingly.

To validate and complete the insights from the fieldwork missions, two validation workshops took place with KMar experts after a first analysis of findings by UM. These workshops, or structured discussions, gathered the technical expertise and feedback of KMar's document fraud unit and smuggling unit. Through these discussions, a series of operational recommendations addressed both at the partner country level and at the EU level were formulated.

## 2.2. Methodological reflections

There are several methodological limitations associated to the chosen research design and more broadly to research on smuggling and trafficking by air and document fraud. Firstly, background evidence and literature on the phenomenon of smuggling by air is scarce. To date, there is one dedicated UNODC issue paper on smuggling by air (UNODC, 2010). While there are numerous up-to-date reports on smuggling by land and sea globally and to the European Union, smuggling by air remains unexposed. Several reports tangentially touch upon smuggling by air when exploring inter-continental smuggling routes (UNODC, 2018; Frontex, 2017; Frontex 2018), but more detailed evidence on the patterns and modus operandi is rarely available.

Secondly, the lack of pre-existing studies on smuggling by air is largely due to the scarcity of data. **For research and intelligence purposes, Frontex collects and compiles data on irregular entries at most EU air borders, however, this data collection system seems to have important pitfalls.** This is partly due to the fact that it is unclear how each member state reports their data to Frontex and to what extent they are authorized to do so. In fact, from the data on irregular entries at EU air borders and document fraud, only a minor part of the cases detected at Amsterdam Schiphol Airport were featured in the Frontex data. For instance, there was only one case of smuggling by air reported from Amsterdam Schiphol in 2016. According to practitioners at Schiphol, this number is incorrect; several hundred cases are detected and prosecuted every year.

**Data on smuggling and trafficking by air is hardly available throughout the EU and is even scarcer in EU partner countries such as Nigeria, Morocco or India. Some countries make no legal recognition of or distinction between smuggling or trafficking of migrants.** In many cases, data on smuggling by air is not systematically collected, registered and centralized. This seems to be the case in Nigerian and Moroccan airports, although both countries are now making progress on this issue. As will be detailed in further sections, a majority of international airports still need to implement systematic data collection as well as digitalization systems in order to get a clearer overview of smuggling and trafficking patterns and modus operandi.

**Thirdly, when data is available, information on smuggling and trafficking by air is difficult to access. Such data is deliberately not shared due to confidentiality and on-going criminal investigations.** Due to the fact that smuggling, trafficking and document fraud can be linked to various other activities such as drug trafficking or terrorism, this is sensitive information that stakeholders are hesitant to share.

In that sense, the reticence of law enforcement agencies to share data and information has been the main limitation to this research. For instance, KMar liaison officers in selected partner countries, whom are key stakeholders, were not authorized to participate in this research. Additionally, law enforcement authorities in Morocco and India were unwilling to participate in the study for the above-mentioned reasons. Accordingly, the sensitivity of such information and stakeholders' interests needs to be well crafted into the design of studies on smuggling and trafficking by air.

Lastly, it is important to note that migrants or victims of trafficking were excluded from the research for a variety of reasons (e.g. complexity, focus of the action and resource allocation). This limits the ability of the researchers to make objective observations or conclusions about migrants' experiences of smuggling by air and its links to document fraud.

### 3. The EU perspective: irregular entries at EU air borders

This section presents the main findings from the first round of interviews with researchers in the area of human smuggling, EU experts and practitioners, in particular with KMar officers at Schiphol airport. The Koninklijke Marechaussee has several units deployed at Amsterdam Schiphol airport. The gate control unit (Grensbewaking), the smuggling and trafficking team (Sluisteam) and the document fraud unit (ECID) coordinate their actions to detect and investigate irregular entries and exits at Schiphol airport. These units are also in regular exchange with KMar liaison officers posted in third countries. In parallel, the research also collected insights from practitioners of the Immigration and Naturalization Services (IND) in the largest asylum-seeker centre of the Netherlands.

#### 3.1. Recent trends of smuggling by air detections at Schiphol airport

Practitioners generally mentioned that smuggling by air into the Netherlands is not a large-scale phenomenon compared to other means of arrival into the EU and into the Netherlands. However, some officers do state that it is ‘a daily business’. **Interviewees reported that there are, on average 650 detections of document fraudsters per year at Schiphol airport.** These are non-EU nationals embarking or disembarking flights with fraudulent documents. This number is substantially higher than the numbers provided by Frontex. Some officers mentioned that in busy periods, such as the summer, the teams detect two or three cases of smuggling per day. Interestingly, officers mentioned that 2017 was a busy year in terms of irregular entries by air. In contrast, irregular entries to the EU by land and sea decreased by more than half in 2017 compared to 2016 (Frontex, 2018). While the data is not exhaustive enough to establish correlations, some officers point to the fact that the closure of the Balkan route and the EU-Turkey deal might have pushed refugees and migrants to resort to travelling by air with fraudulent documents.

**Several practitioners mentioned that, in recent months, irregular entries at Schiphol airport were often proceeding from Greece, some of which were arrivals from small Greek islands airports.** As a result, additional checks to flights incoming from Greece have significantly increased in recent months, particularly in the summer of 2018. **Officers mention that the system of “pre-boarding” has become a more regular practice for flights departing from Greece.** Pre-boarding adds another layer of checks and is performed by local authorities and/or airlines companies on flights indicated as ‘risk flights’.

**According to most officers, the airports of Casablanca, Lagos or New Delhi are currently not in the “top ten” of irregular arrivals at Schiphol.** For instance, KMar detected 21 Nigerians smuggled by air in 2016 and 10 in 2017. Only half of them arrived directly from Lagos airport. Interviewees mentioned that the three main nationalities of apprehended irregular migrants in 2016 and 2017 were Syrian (211), Albanian (171) and Iranian (111), followed by Turkish (74). However, nationalities and routes are constantly in flux. **Concerning the air routes, most irregular migrants apprehended at Schiphol largely came from Greek airports, following by the airports of Turkey and Italy.**

Indeed, experts also mentioned many ‘one-time cases’ in which specific groups of migrants attempt to be smuggled by air to or through the Netherlands. For instance, several Chinese Uyghur arrived at Schiphol in 2016 with fraudulent documents, having transited through Casablanca airport. In 2017, thirteen LGBT Cuban nationals stayed at Schiphol, their supposed transit point, and applied for asylum. They had booked flight tickets to Moscow (for which no visa is needed for Cubans) but planned to remain at the transit point in Amsterdam in order to apply for asylum in the EU. It is important to note that both cases seem to refer to **persecuted communities for which smuggling by air has been a strategy to access asylum from within the Schengen area.**



### 3.2. Recent trends in smuggling by air at all EU air borders

The dataset provided by FRONTEX in 2018 gives an overview of irregular entries at EU air borders; it provides information on the main air routes, document fraud techniques, nationality, gender and role of irregular migrants (whether these are over-stayers, asylum seekers, irregular migrants, facilitators or traffickers) and covers the years 2015, 2016 and 2017. The data is reported from 38 European airports, including the EU's busiest airports in 2017: London Heathrow, Paris Charles de Gaulle, Amsterdam Schiphol, Frankfurt, Madrid, Munich and Rome Fiumicino.

It is relevant to note that over-stayers constitute the vast majority of 'irregular' entries and exits detected at EU air borders. Over-stayers attempt to leave or re-enter an EU country after their Schengen visa has expired. Excluding detection of over-stayers, the number of irregular entries detected at EU air borders remains below 1000 cases according to the data provided by Frontex. However, other experts report much higher numbers.

**In 2015, there were 5329 document fraudsters reported at all EU air borders combined, cases decreased to 4324 in 2017.** As a matter of comparison, irregular border crossings by land and sea detected in 2015 and 2016 amounted to 2.3 million (European Parliament, 2017)<sup>1</sup>.

The analysis of the data reveals **there are few cases of irregular migrants whom arrived at EU airports from the airports of interests in this action, namely Casablanca, Lagos and New Delhi airport.** For the three years observed, there were 287 irregular entries from Lagos airport and 42 irregular entries from New Delhi airport. There were 460 irregular entries coming from Casablanca airport. The nationalities observed from Casablanca airport are mainly Moroccan and West African (Cote d'Ivoire, Guinea, Senegal and Congo DRC). This could indicate that Casablanca airport is an important point of transit for migrants smuggled from West Africa by air. Perhaps unsurprisingly, most irregular entries from Lagos corresponded to Nigerian nationals while most irregular entries from New Delhi corresponded to Indian nationals (see Table 2 below).

**In terms of air routes, irregular migrants from or transiting through Casablanca airport were most often destined to Lisbon, Milano and Rome.** Irregular entries from Lagos were detected mainly at Rome, London Heathrow and Paris airport. Migrants smuggled by air from New Delhi most often transit in Moscow, final destinations often include Rome, Milano and London as well (see Table 2 below). Once again, bearing in mind that the number of cases detected is small; the data presented does not allow us to draw solid conclusions on trends and routes.

---

<sup>1</sup> <http://www.europarl.europa.eu/news/en/headlines/society/20170629STO78630/eu-migrant-crisis-facts-and-figures>

TABLE 2. IRREGULAR ENTRIES REPORTED AT EU AIR BORDERS BY SELECTED AIRPORTS OF ORIGIN

From selected airports	Casablanca CMN	Lagos LOS	New Delhi DEL
Irregular entries reported at ALL EU air borders			
<b>2015</b>	155	218	10
<b>2016</b>	142	40	18
<b>2017</b>	163	29	14
Top 3 places of detection			
<b>1</b>	Lisbon LIS	Rome FCO	Rome FCO
<b>2</b>	Milan MXP	London LHR	Milan MXP
<b>3</b>	Rome FCO	Paris CDG	London LHR
Main nationalities of persons on the air route			
<b>1</b>	Morocco	Nigeria	India
<b>2</b>	Côte d'Ivoire	Congo (DRC)	Sri Lanka
<b>3</b>	Guinea	Cameroon	China
<b>4</b>	Senegal	Ghana	Iran
<b>5</b>	Ghana	Mali	Bangladesh

The data concerning main airports of transit and arrival in the EU is partially in line with the experts' insights presented earlier. Table 3 presents the data for the airports in which most irregular entries were detected and reported. Despite not being in the top five reported airports, Amsterdam Schiphol is nevertheless included.

TABLE 3. IRREGULAR ENTRIES REPORTED AT SELECTED AIRPORTS OF TRANSIT

Top 5 EU airports of destination (inbound 2015 - 2016)				
	<b>Total</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>Dublin</b>	4.230	1.517	1.330	1.383
<b>London, Heathrow</b>	2.075	761	598	716
<b>Paris, Charles de Gaulle</b>	1.764	546	593	625
<b>London, Stansted</b>	1.651	573	513	565
<b>London, Gatwick</b>	1.647	662	537	448
	<b>Total</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
<b>Amsterdam</b>	1.886	613	560	713

TABLE 4. MAIN AIRPORTS OF EMBARKATION

Destination (top 5)	Embarkation (top 3)	
<b>Dublin</b>	Brussels	372
	Milan MXP	321
	Rome FCO	302
<b>London, Heathrow</b>	Brussels	251
	Athens	125
	Lagos	117

<b>Paris, Charles de Gaulle *</b>	Heraklion	74
	Athens	68
	Milan MXP	38
<b>London, Stansted</b>	Milan BGY	202
	Milan MXP	84
	Cologne	79
<b>London, Gatwick</b>	Milan MXP	279
	Rome FCO	143
	Venice	92

Dublin, London Heathrow and Paris Charles de Gaulle reported the highest number of irregular entries in 2015, 2016 and 2017. Dublin reported a record of 4,230 cases between 2015 and 2017. Most smuggling air routes seem to occur intra-EU. Irregular travellers detected at Dublin and London airports often embarked in Brussels. Airports in Italy (Milano BGY, MXP and Rome FCO) as well as airports in Greece (Athens, Heraklion) are also often cited as airports of embarkation.

Istanbul appears to be among the first destinations of irregular migrants apprehended at Athens and Amsterdam airport. **Istanbul appears as an airport of departure or transit in a large share of irregular entry cases reported from different EU airports.** As mentioned earlier, Istanbul airport is often cited as a hub for air smuggling from the Middle East towards Europe. Countries of origin of smuggled migrants were primarily Iraq, Turkey, Syria, Palestine and Iran (Frontex dataset, 2018).

After Istanbul airport, the second-most reported last departure airport remained Dakar International Airport in Senegal, with 222 detected persons using fraudulent documents to cross the EU's external border. The Frontex AFIC 2018 report also states that a large amount of detections at EU level was reported on arrival from Tirana airport (Frontex, 2018).

### 3.3. The modi operandi of smuggling by air

It is important to note that the volume, routes, modus operandi of smuggling by air varies constantly. That is precisely why it is extremely challenging to combat smuggling and trafficking by air, in experts' opinions. As one of the members of the anti-smuggling unit illustrated:

*"There is no specific modus operandi from one specific airport; there will always be some big transit hubs next to Schiphol, such as Dubai, Abu Dhabi, Istanbul... But there is no pre-determined modus operandi, like it's always this airport or it's always this nationality. It's variable." (Expert Interview – Sluisteam)*

Although there are some patterns in the modi operandi of smuggling by air, these are rapidly adjusting according to authorities' reaction. **First, irregular migrants might use Schiphol airport as a 'claimed' transit point since there is often no transit visa required.** Facilitators can make use of the fact that many nationalities do not need a visa to transit via Schiphol airport, and use it as a strategy to get migrants into the Netherlands. **The strategy consists of booking flights that transit through Schiphol with the intention to stay in the Netherlands rather than continuing their journey onwards. In such cases, migrants often request asylum directly upon arrival at Schiphol airport.** Officers indicate that in many of these cases, asylum applicants eliminate the documents used for the first leg of their journey.

In the cases where smuggled migrants are not asylum applicants, facilitators might arrange new passports, IDs or residence permits which are handed over to migrants upon arrival at the 'claimed' transit point. Once received, smuggled migrants attempt to leave the transit area with the new documents. To illustrate this fact, KMar officers gave the example of Chinese migrants whom booked flights to African destinations such as Nairobi (no visa requested for Chinese nationals) with a transit in Amsterdam Schiphol and then attempted to enter the Netherlands with genuine or forged passports from Singapore or Malaysia, for which no visa is required for short stays in the Netherlands.

In numerous other cases, **Schiphol airport is a convenient transit point for inter-continental air smuggling routes**. Most officers mentioned that Schiphol is an important transit airport for different air routes; it is a hub for South Asians and Chinese travelling to North or South America, as well as for nationals of the Gulf States travelling to the US. **According to some KMar officers, Amsterdam is seen as a "gate to America" for the Middle East and Asia since many major airlines use Schiphol as their connecting base.**

**The second most used modus operandi consists of attempting to enter the Netherlands directly -not as a 'claimed' transit point- with the use of document fraud. The impostor or look-a-like technique is the most encountered by KMar Units at Schiphol.** In the cases of Syrian migrants, travelling from Athens or the Greek islands to Schiphol, genuine passports from other members of the family, with genuine Schengen visas or genuine Romanian and Italian ID-cards were reportedly used. Cases of replacement of the bio-page or photo substitution have also been signalled. Experts explain they find forged, counterfeit and impostor documents from flights incoming from Greece almost on a daily basis. An expert from ECID mentioned that the team dealt with 767 cases of fraudulent document in 2017 alone.

**Lastly, practitioners report a third modus operandi consisting of swapping flight tickets and travel documents at the transit area or 'airside' (after immigration controls).** This modus operandi is riskier and requires the presence of a facilitator who ensures that the traveller will find the new boarding pass and document in the transit section. This modus operandi has been used, for instance, by Indian nationals destined to the UK or Canada and who initially travelled with authentic Indian passports.

**Facilitators and irregular migrants often use large international airports for smuggling by air.** Primarily because large airports provide as a transit point or gateway to other parts of the world as many major airlines use it as a connecting base. Facilitators may use large international airports as a hub for transit to other destinations or as migrant's final destination. In Europe, Schiphol airport can be considered such a smuggling hub. One of the explanations behind this is that Schiphol airport has a free transit visa regime for many nationals. This in some instances allows migrants to use Schiphol as a 'claimed' transit point in their travel itinerary but then, once they arrive at the airport, for example deliberately miss their connecting flight to a visa-free country, or change their final destination at the transit point. This **'irregular use of visa regimes'** may also be used by facilitators to smuggle migrants into the Netherlands. The most common strategy here is to book flights that transit through Schiphol and then requesting asylum upon arrival at Schiphol airport. Officers indicate that in many of these cases, asylum applicants eliminate the documents used for the first leg of their journey.

One of the KMar experts pointed out that there is no specific, pre-determined modus operandi for one specific airport. Rather modus operandi vary and **there will always be big airport transit hubs that can become main smuggling hubs**. The airport of Istanbul is, for example, often pointed to as a main hub for human smuggling by air, especially for migration from the Middle East or from South Asia.

Other examples of popular transit hubs on the African continent include: Dubai, Abu Dhabi and Casablanca. Various experts, however, believe that Casablanca airport might be a hub of arrival rather than departure. This can be explained by the fact that many West-African countries do not require a visa to enter Morocco for a period of 90 days. Also, many West-African capitals are connected to Casablanca airport with daily Royal Air Maroc flights. However, experts have noted that migrant smugglers and traffickers might abuse this 'visa-free regime' and overstay their 90 days visa-free stay or attempt to travel onwards to Europe without a Schengen visa. Important to note is, however, that the use of the visa-free (transit) regime is not illegal or irregular in itself; irregularity only takes place when the visa-free period is not respected or when the visa-free transit is being misused.

The fieldwork mission to India confirmed the popular inter-continental air routes that use the Middle East and Gulf States as a transit hub for irregular migration from India; for onwards travel to Europe, as well as to South-America and then onwards to North America. As an example, Abu Dhabi is an often used transit airport, as it offers connecting flight to Europe as well as to the US and Canada, and Indians do not require a visa for transit in the Gulf States.

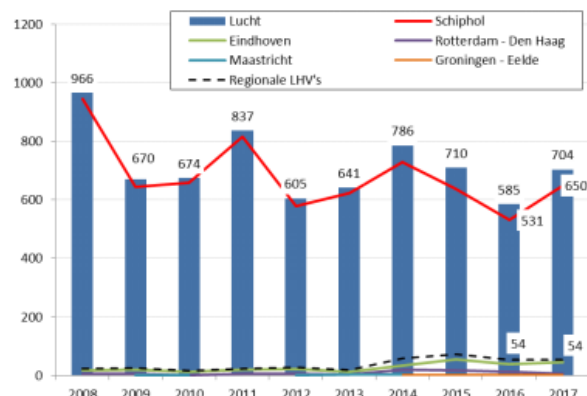
Along with the fluidity of *modus operandi*, the structures of smuggling networks have evolved substantially within a decade. **While smuggling by air used to be operated by rather large and consolidated smuggling networks, practitioners are noticing that the phenomenon is becoming much more scattered and 'independent'.**

**Additionally, facilitators previously used to travel together with groups of smuggled migrants or at least be present at transit points; however, this is no longer the case. Smugglers now coordinate people's journey remotely and provide instructions via smartphone apps** such as WhatsApp, Messenger or Viber. As a result, the organizers of migrant smuggling or trafficking remain in the origin country or a third country and do not take any risks. According to practitioners, it is therefore increasingly difficult to investigate and arrest smugglers.

### 3.4. The role of document fraud

In its 2017 Statistic Annual Review on Document Fraud (KMar/ECID, March 2018<sup>2</sup>), ECID reported 704 cases of document fraud detected at all air borders in the Netherlands, of which 650 cases were dealt with at Schiphol airport. As shown in Figure 2. below, the volume of document fraud oscillates between 600 and 800 detections per year since 2009 and there seems to be a general downward trend in the last decade.

FIGURE 2. DOCUMENT FRAUD DETECTION AT DUTCH AIR BORDERS (2008-2017)



According to experts, the top 3 document identified in document fraud cases have been; (1) Passports<sup>3</sup>, (2) Identity cards and (3) Residence permits. From 2008 to 2017, the apprehended suspects represented 75 different nationalities, of which the largest share had Syrian nationality and were often identified on air routes from Greece. The second largest share of fraudsters were Albanian nationals, often identified on air routes towards the UK.

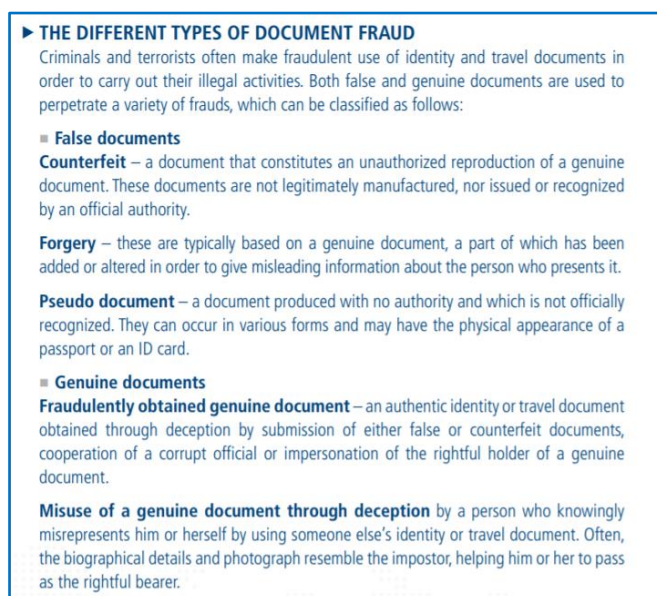
In 2017, most cases of document fraud were identified on flights incoming from Athens airport (161 cases – 24.8%). Another 22.3% of the cases (145) were identified upon departure from Schiphol airport, mostly on flights departing to the UK (50.7%), Ireland (12.3%) and Canada (11.0%). The Dedicated Date Control, whose role is presented in the next sections, was responsible for most apprehensions at Schiphol.

Overall, experts agree that document fraud plays a fundamental role in smuggling by air. Compared to land and sea borders, experts note that the type of forgeries detected at air borders are more diverse and riskier. However, the advances in the production of identity documents and the democratization of biometric documents throughout the world have reduced the possibilities for counterfeits and forgery. A typology of document fraud is presented in Figure 3 below.

<sup>2</sup> [https://privacyfirst.nl/images/stories/WOB/ECID/Statistisch\\_overzicht\\_documentfraude\\_2017.pdf](https://privacyfirst.nl/images/stories/WOB/ECID/Statistisch_overzicht_documentfraude_2017.pdf)

<sup>3</sup> In 2017, most of the document fraud cases with passports were identified with European national passports (mostly British, Swedish and French passports). Of which most were forged, some used as look-a-likes or completely fake.

FIGURE 3. INTERPOL TYPOLOGY OF DOCUMENT FRAUD (INTERPOL, 2017)



The act of counterfeiting, or fully fabricating a passport, has indeed become more difficult nowadays. Forgery, the act of altering a genuine document by replacing the bio-page, substituting the identity picture or faking entry and exit stamps, has also become more tedious due to the increasing quality and level of security in passports and ID documents. **As a result, experts note that the impostor technique has become increasingly popular, to the point that it is now the most common document fraud technique detected at EU airports.** As one of the experts puts it:

*“The safety features of documents keep getting better every day. It is harder to make a high quality counterfeit or forged document. Using an impostor document will become more and more common modus operandi.” (Expert Interview – ECID)*

In addition, ECID experts point to an emerging modus operandi seen at Schiphol airport, namely: **smuggled migrants are increasingly using the impostor method with ‘foreign resident passports’ (vreemdelingenpaspporten).** This document is granted to third-country nationals who have obtained permanent residency in the Netherlands. These documents have reportedly been sold to migrants and the sellers subsequently declare the loss of their document. This was the main modus operandi of Syrian and Iraqi irregular migrants on the air route from Athens to Amsterdam. For instance, Syrians who have been granted asylum in the Netherlands attempt to get their families by air from Greece to the Netherlands by sending over their own documents to their cousins, brothers or sisters (impostor technique).

**Experts furthermore indicated that passport rental is an important business; Schengen residents have reportedly sent over their passport for a certain price to facilitators or aspiring migrants.** In these cases, exit stamps sometimes need to be forged into the passport before the person can use it during an incoming flight into the Schengen area. The passport can be used several times by different persons. In that sense, interviewees explained they become suspicious during sudden peaks in passport loss declarations. Other interviewees mentioned that in some cases of human trafficking, crime networks organized the robbery of a large number of Schengen passports and IDs.

Recent data on the most commonly used document fraud techniques for irregular entries at EU air borders is very much in line with the qualitative findings mentioned earlier; **the EU trends of**

document fraud at the EU level seem to align with the findings in the Netherlands. In a recent report, Frontex reveals that 64.0% of all document fraud cases are detected at EU air borders (Frontex, 2018). In 2016 and 2017, Frontex reported that there were more than 4,000 cases of fraudulent documents intercepted at European air borders. Istanbul Atatürk Airport remains the top departure airport for detections of fraudulent documents from third countries.

‘Ordinary passports’ are more frequently encountered in document fraud. The most commonly reported technique is that of the ‘impostor’ or ‘look-a-like’, where smuggled migrants present a passport from a different person with similar traits. From 2015 to 2017, Frontex data reveals there were 358 impostor passports detected at EU air borders, 11 of which were reported from Amsterdam airport. Document fraud experts at Schiphol reported that the number of cases at that airport was in fact much higher. In 2017, there were 22 cases of impostor passports reported from Lisbon airport and 21 cases report from Paris CDG airport.

Substitution of the bio-page in ordinary passports is the second most used technique according to Frontex data. From 2015 to 2017, the majority of EU airports reported between two and eight cases per year. Other document fraud techniques that consist of altering a passport are: the substitution of the identity picture, as well as faking entry and exit stamps from Schengen countries.

To a lesser extent, other documents such as visas and identity cards have also been the object of document fraud. From 2015 to 2017, 165 cases of visa fraud have been reported from EU air borders (see Figure 4 below).

FIGURE 4. DOCUMENT FRAUD TECHNIQUES AT EU AIR BORDERS 2015-2017

Passports (all types) 2015 - 2017			ID cards 2015 - 2017		
Type of document fraud	Number	Perc.	Type of document fraud	Number	Perc.
All other EU airports			All other EU airports		
AUTH-IMPOSTOR	4.813	21,8	FALSE-COUNTERFEIT	6.522	42,4
FALSE-COUNTERFEIT	4.005	18,2	AUTH-IMPOSTOR	2.044	13,3
FALSE-NO MORE DETAILS	2.122	9,6	FALSE-STOLEN BLANK	1.976	12,9
FALSE-BIOPAGE	2.058	9,3	FALSE-IMAGE SUB	1.871	12,2
FALSE-NEWBIOPAGE	2.040	9,2	FALSE-OTHER	1.549	10,1
AUTH-CONTAINS FALSE DOC	1.875	8,5	FALSE-NO MORE DETAILS	1.002	6,5
FALSE-IMAGE SUB	1.559	7,1	AUTH-FRAUDULENTLY OBTAINED	184	1,2
FALSE-OTHER	1.283	5,8	FALSE-BIOPAGE	154	1,0
AUTH-FRAUDULENTLY OBTAINED	852	3,9	FALSE-MUTIL	37	0,2
FALSE-PAGESUB	598	2,7	FALSE-PSEUDO	29	0,2
FALSE-MUTIL	405	1,8			
FALSE-STOLEN BLANK	393	1,8			
FALSE-PSEUDO	34	0,2			
FALSE-E-DEVICE	19	0,1			



### 3.5. Combatting migrant smuggling by air and document fraud: the Dutch expertise

#### ECID

ECID is the Identity Fraud and Documents Centre of Expertise and the national point of contact for document and identity fraud in the Netherlands. As such, ECID supports, among others, the air border control teams of the Royal Netherlands Marechaussee. Aside from its investigative, analysis and advisory activities, ECID offers trainings to their peers, and to local police and immigration officials across the world, including training instructors. ECID has a separate department for training purposes and is the only expertise centre in the EU that is organized as such.

Together with Interpol, the U.S. Department of Homeland Security, the Australian Government, Canada Border Agency Services and the UEA Federal Authority for Identity & Citizenship, ECID has created a knowledge databank called Edison<sup>4</sup>. In Edison, specimens of passport and various travel documents from each country in the world are recollected. The databank is useful for officers to crosscheck the validity of certain documents. The databank is used in airports worldwide, including in Nigeria and India.

In addition to the 'online library' Edison, ECID also has a physical library in place, where confiscated documents are kept and further analysed. The team can use these specimens as a reference to compare documents and identify any cases of forgery. ECID is the only organization in the European Union that has such a facility in place. As such, ECID has a 'preservation function' to keep/store all documents found in the Netherlands, but also Dutch documents that are intercepted abroad and sent back to the Netherlands.

In order to investigate the links in a series of 'separate incidents' on document fraud, ECID also uses a new databank called Summ-IT, which is a police registration system for investigations which keeps track of documents fraud identified anywhere in the Netherlands. This recently implemented system helps investigators find connections between documents, routes and modus operandi; it facilitates investigation and risk analysis and is considered a 'best practice' of policing in the EU.

ECID also uses up-to-date forensic equipment that allows for a more efficient detection of fraudulent document since forgery and counterfeiting techniques evolve rapidly. A price list for such equipment is provided below in order to give a reference for further technical and financial needs assessments.

TABLE 5. PRICE LIST OF DOCUMENT FRAUD EQUIPMENT

Equipment	Estimated Prices in Euro's (excl. Taxes)
DOCUBOX incl. PC, Monitor & Forensic Software	30.000,00
Microscope with integrated camera	8.500,00
USB microscope	100,00
Forensic Loupe	85,00
Doculus Lumus loupe	150,00
UV – flashlight	270,00

<sup>4</sup> <http://www.edisontd.net/>

## Dedicated Gate Control

This specialized team of the Royal Marechaussee (KMar) was established in 2013 to conduct dedicated gate controls targeted at so called 'risk flights' to combat document fraud and migrant smuggling/trafficking by air. The DGC duties also include preventing migrants to switch or swap fake or fraudulent documents in the transit area.

The DGC team coordinator checks the Schengen Information System (SIS) and the Advance Passenger Information System (APIS) for risk flights. While the DGC is not allowed to check all the API data itself, the team intervenes based on information from other KMar units or their own risk analysis base. Depending on the number of passengers on a risk flight, DGC officers are sent to the respective gate to conduct control checks. The DGC mainly checks international and intercontinental flights. Recent checks by the DGC often include Istanbul, Dubai or Kuwait. As part of the Schengen regulations, only 30.0% of the Schengen flights can be checked, and only 30.0% of the passengers on those flights may be checked. However, the DGC had to make an exception with ingoing and outgoing flights to Athens due to exceptional circumstances. The DGCs also cooperate closely with airlines on a daily basis.

The Netherlands is one of the few countries in Europe to use the system of Dedicated Gate Control teams. According to practitioners, DGCs are a best practice in the fight against migrant smuggling and human trafficking by air.

## EU Police cooperation

Several practitioners mentioned that cooperation with their Belgian and German colleagues is good. However, they encounter some language barriers to cooperate with corresponding French or Spanish organisations. This constitutes an important obstacle to information sharing across the EU. Dutch experts are convinced of the utility of data and information sharing, as it is crucial for both risk prevention and investigation.

## Part 2: Background review and legislative mapping of selected partner countries

---

### 4.1. Morocco

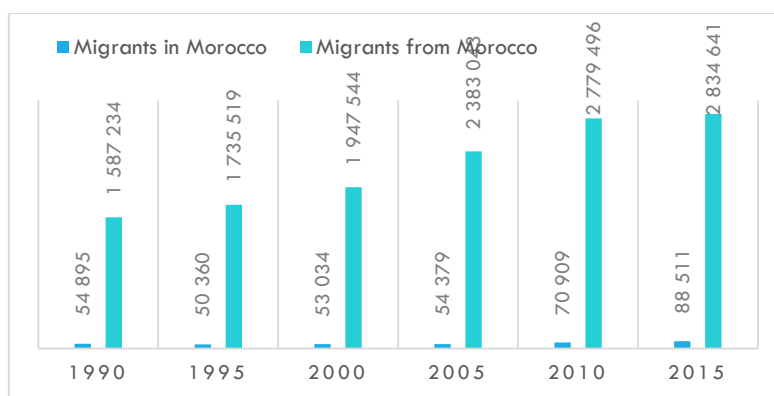
Morocco is the fifth largest economy in Africa and a major migrant sending country. The total population of Morocco stood at 34,803 million in 2015, of which 0.2% are immigrants. On the other hand, 2.4 million first-generation Moroccan-born migrants were residing in Europe as of 2011, the largest number from any Southern Mediterranean country (de Bel Air, 2016).

Morocco has a long history of circular migration to Europe. In the context of post-war reconstruction, Moroccan migration towards Europe increased sharply; in the mid-1960s, several “guest worker” programs were signed with France, Germany, Belgium and the Netherlands. This resulted in the spatial diversification of Moroccan migration, which up until then had been exclusively directed to France. Since the mid-1980’s, Spain and Italy have emerged as a main destination for Moroccan labour migration. Migrant workers, often undocumented, have been attracted by the demand in the construction, agriculture and service sectors (de Haas, 2009).

With 8.5% of its population residing abroad (2.8 million people), Morocco is one of the top ten remittance recipient countries in the world (Orozco, 2003). Remittances represent 6.5% of the country’s GDP on annual average (World Bank, 2017). According to de Haas (2006a) there is a strong relationship between emigration and household income, “with the main dividing line running between households with and without access to international remittances” (p.569). In most deprived areas, international migrant remittances account for 53.0% to 59.0% of household income.

While Morocco remains mainly a country of emigration, it is also emerging as a destination and transit country. Europeans, particularly French, are Morocco’s first immigrant population, with approximately 35.000 residents, followed by Algerians and other MENA countries nationals (UN DESA, 2015). Since the 1990s, Morocco has developed as a transit country for sub-Saharan Africans trying to migrate to Spain and the EU. Transit migrants come from Senegal, the Gambia, Congo, Nigeria, Cameroon and Cote d’Ivoire and reach Morocco via a perilous journey through the Sahara. Given the irregular nature of this increasing migration trend, the total number of immigrants present in Morocco is difficult to ascertain.

FIGURE 5: INTERNATIONAL MIGRANT STOCKS IN AND FROM MOROCCO BY YEAR (1990 – 2015)



Source: UNDESA, 2015

In the face of recent international migration challenges, the EU has intensified its cooperation with Morocco on the issues of regular and particularly irregular migration. In 2013, Morocco became the first Southern-Mediterranean country to sign a Mobility Partnership with the EU, which aims to “strengthen cooperation in the management of migration flows” (Council of the European Union, 2013). While certain pillars of cooperation have seen progress, such as the support for the Moroccan diaspora wishing to invest in Morocco or cooperation in the field of human trafficking and asylum, readmission as well as visa facilitation questions are still under discussion.

#### 4.1.1. Migrant Smuggling in, through and from Morocco

##### *Overview on smuggling of migrants through and from Morocco*

According to the United Nations Protocol against the Smuggling of Migrants by Land, Sea and Air (2000), smuggling of migrants refers to “the procurement, in order to obtain, directly or indirectly, a financial or other material benefit, of the illegal entry of a person into a State Party of which the person is not a national or a permanent resident” (p. 2). Given the hidden nature of the phenomenon, there is currently no data available on the extent of migrant smuggling globally or regionally (IOM, 2016). However, a joint report by Europol and Interpol estimates that more than 90.0% of irregular migrants to the EU are facilitated by criminal networks (Europol-Interpol, 2016).

**In 2017, 23,143 illegal border crossings were detected on the Western-Mediterranean route**, with the majority of migrants on the route being nationals of Morocco, Algeria and Cote d’Ivoire (Frontex, 2018). Between January and end of August 2018, authorities in Spain registered 33,912 migrants and refugees arrivals, a 134% percentage increase from 2017; becoming the first country of arrival for Mediterranean crossings in 2018. Most arrived in Spain by sea (86%), while 14% arrived by land through the Spanish enclaves of Ceuta and Melilla with 4,575 unauthorized crossings (IOM, 2018). This is the highest number of crossing on the Western Mediterranean route ever observed since data collection began (ibid.).

Given its proximity to Spain and the Schengen area, Morocco is often considered a stepping stone for North and West-African migrants. Since the 1980s, the cities of Tangiers and Nador, neighbouring the Spanish enclaves of Ceuta and Melilla respectively, have become important transit hubs (see Figure 4). Undocumented migrants from Sub-Saharan Africa as well as Morocco, Algeria or Syria, temporarily settle in North-Moroccan suburbs and wastelands until they cross over (Schapendonk, 2011). According to Frontex (2018), the observed increased usage of rubber dinghies east of the Strait of

Gibraltar – used mainly by sub-Saharan migrants – suggests increased activity of people smuggling networks. Most irregular arrivals from Morocco happen by sea.

The rapid growth of these transit hubs in the Northern regions has favoured the development of smuggling networks. In fact, Morocco is the country of origin of most facilitators detected at EU borders in recent years, with 1,233 facilitators detected in 2016 and 791 in 2017, indicating a 36.0% decrease between both years (Frontex, 2018). Whether migrants plan on entering Spanish territory by sea or by land, smuggler's services are required in the vast majority of cases.

From the evidence collected in these transit hubs, connivance and corruption of border guard officers is a prerequisite for many of the services proposed by smugglers (Europol-Interpol, 2016; Statista, 2018; UNODC, 2010). Unauthorized crossing of land borders also involves well-organized smuggling networks, which provide the means of transportation at each connection point. Smugglers or passengers also often have to bribe military or police checkpoints at border crossings; this might involve money or sextortion of women and girls in certain cases (Merkle, Reinold and Siegel, 2017).

### *Scale and characteristics of smuggling by air through and from Morocco to Europe*

Smuggling by air from West Africa into Morocco is less common but remains one of the existing options for those who are able to pay a higher price for a faster and more secure journey. In 2008, de Haas noted that an increasing number of West-African migrants make part of journey by airplane (de Haas, 2008). The share of migrants using air routes is unknown; however, a 2008 survey of 1,000 irregular sub-Saharan migrants in Morocco showed that 13.0% of them had arrived by air to Casablanca airport (Mghari, 2008, p. 5). **It is important to note that the journey by air from West African airports to Morocco is regular, since no visa is required for short stays.**

Recently, a criminal investigation revealed that a transnational smuggling network had been getting Senegalese undocumented migrants to Morocco through flights from Dakar to Laayoune and Casablanca. The network had been operating for five years and was supported by corrupt officers at the Leopold Sedar Senghor airport in Dakar (Le Monde-AFP, 2017). On the other hand, Algerian citizens have used Algiers to Casablanca flights as the first segment of their journey to Spain (Alberola & Merkle, forthcoming). Algerians do not require visas to Morocco, which makes the journey legal. However, it remains unclear whether smuggling networks are involved from this first part of the journey. As noted by a UNODC report, the airports of Morocco, together with those of Libya and Algeria, might be an entry point for hundreds of irregular migrants every year, although this is yet to be proved by reliable data (UNODC, 2010).

FIGURE 6. MTM MAP ON MIXED MIGRATION ROUTES (2014)



In smuggling routes involving travel by air, Moroccan airports seem to be more hubs of arrival rather than departure. As described previously, a small but substantial share of irregular migrants present in Morocco has arrived through air routes (Mghari, 2008; UNODC, 2011). However, direct flights from North African cities to Europe involving document or visa smuggling are not a prevalent modus operandi to enter Europe irregularly (Europol-Interpol, 2016; Lahlou, 2015; UNODC, 2010). This is especially the case in Morocco, given the proximity of Spain and its relative accessibility by land (through Ceuta and Melilla) and sea.

While no in-depth study has been conducted yet on smuggling by air from Morocco, there are a few indices on this phenomenon. A recent report by Frontex (2016) noted that Casablanca airport is the second African airport of last departure for detected document fraudsters traveling to EU/Schengen area. Among African airports, Casablanca saw one of the fastest developments for such practices, with a 30.0% increase in 2015. The same report indicates that, in 2015, “a certain amount” of Moroccan nationals were detected in irregularity on air routes between Casablanca and Rome or Istanbul airport, although the precise figures are not made available. Recent data from KMar’s Identity Fraud and Document Centre of Expertise indicates that between 2015 and 2017, 25 irregular entries proceeding from Casablanca Anfa and Mohammed V airports have been detected at Amsterdam Schiphol airport, all of which involve the use of one or several fraudulent travel documents.

Irregular travel by air to or from Morocco is most often part of a combined smuggling route that combines travel by land and/or sea. Earlier research revealed the existence of a combined trip from Morocco to Italy that includes transport by car to Casablanca airport, the flight to Tripoli and transport by car to the coastal departure point Libya for a total price of EUR 4,000 (Monzini, 2007). Smuggling by air often involves this kind of “full package” option, in which smugglers have arranged all the intermediary services from the origin country to the EU; transport, forged passport and visa as well as flight tickets (Europol-Interpol, 2016; UNODC, 2009). The full-package option is very expensive, hence why it is not a common migration option for a majority of Moroccan and West-African prospective migrants (UNODC, 2010).

Due to the fluidity and adaptability of smuggling networks, air routes used for smuggling to and from Morocco are constantly evolving. In recent years, the most targeted destinations from the Casablanca airport were Milan, Rome and Frankfurt, mostly chosen by Moroccan, Senegalese, Ivorian, Ghanaian, Sri Lankan and Congolese nationals (Frontex, 2017b). The air route connecting Casablanca to Milan and Rome have detected the most irregular entries from Morocco to the EU in 2016. To a lesser extent, document fraudsters have also used air routes from Tangiers to Madrid and Barcelona (ibid.).

#### 4.1.2. Smuggling networks in Morocco

##### *Structure of smuggling networks in Morocco*

As mentioned earlier, Morocco is the first country of origin of facilitators detected at EU borders. Moroccan facilitators account for 8.0% of the total facilitators detected in Europe in 2017 (Frontex, 2018). Smuggling networks are present across Morocco, with operational members posted along the transit hubs of Northern Morocco (Tangiers, Nador) or in the Eastern city of Oujda, the main entry point at the Algerian-Moroccan border.

While some smuggling networks operating in Morocco are run by Moroccan nationals, these can also be constituted by foreign residents. Senegalese, Nigerian, Ivorian or Malian smuggling networks have been detected in the country (Le Monde-AFP, 2017; UNODC, 2011). Nigerian smugglers, for instance, have notably succeeded in taking control of a large share of human smuggling and trafficking from Morocco to Spain (Carling, 2007). Collected testimonials reveal that smugglers are often the same nationality as their “clients”. In many cases, smuggling networks are formed by members of diverse nationalities, with Moroccan members operating on the final part of the journey in many cases (Favre, 2015). It is also important to keep in mind that smuggling networks do not only operate in origin and transit countries; they are also often present in destination countries. Indeed, migrants in irregular

situations in Europe might contact members of a network to obtain counterfeit documents in order to remain in the country (Europol – Interpol, 2016).

In fact, smuggling networks are organized in very loose structures, stretched across migration routes from origin to destination countries (Europol-Interpol, 2016). As described in most reports, the classic structure of migrant smuggling networks is comprised of leaders coordinating the network along the route (*“Patrons”* in French or *“Jefes”* in Spanish), intermediary organizers at the local level in transit hubs known as chairmen, as well as low-level opportunistic facilitators (UNODC, 2011; Europol, 2016). While migrant smuggling networks in Morocco started as small, locally run business covering only part of the journey, reports point at an increasing *oligopolisation* of the migrant smuggling business, where larger, more resourceful networks are taking over local ones (Europol, 2016).

In fact, in its early phase, smuggling by sea from Morocco to Spain was organised spontaneously by small fishermen communities. With increasing controls and border security – notably the installation of the SIVE surveillance system in Spain’s southern coast – professional smuggler’s networks have developed to propose a diverse range of services from crossing the Gibraltar Strait with rubber dinghies to more complete packages to go to Spain or Italy, including documents and work permits (Coslovi, 2007; UNODC, 2010)

### *Poly-criminality*

Lastly, it is important to note that organized crime networks operating for migrant smuggling are often involved in other type of crimes. Europol (2016) identifies two main links between migrant smuggling and other types of crimes. First, the criminal infrastructures and routes used for migrant smuggling can be used for the smuggling of drugs or other illicit goods. Indeed, the existence of common routes for different forms of smuggling provides opportunities for organized crime networks. The rise in demand for migrant smuggling in the last five years has caused some groups to add this lucrative activity to their criminal portfolio. Second, migrant smuggling is supported by other criminal activities such as document fraud and labour exploitation. In particular, migrant smuggling by air necessarily requires fraudulent documentation. These include travel and identification documents (passports, visas) as well as breeder documents (birth certificates, work permits etc.). In 2015, migrant smuggling suspects has links with other crime areas such as drug trafficking, human trafficking, property crime and document fraud (Europol-Interpol, 2016).

### **4.1.3.      Trafficking of migrants by air from Morocco to Europe**

Although smuggling and trafficking of migrants are often connected, it is important to distinguish them as two separate criminal activities. Migrant smuggling has been defined earlier as the facilitation of illegal entry of a person in exchange of financial or material benefits. On the other hand, trafficking has been defined in the Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons (2000) as the: *“recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of [...] sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.”* While smuggling and trafficking of migrants can be operated by the same organized crimes networks and/or use the same routes, the nature of profit is different; in smuggling, it results from the fee paid by migrant, whereas in the case of trafficking profit comes from their exploitation.



In the last decade, trafficking of women and girls has increased in Morocco (MSF, 2013; UN WOMEN, 2015). Besides being a major country of transit for victims of human trafficking, Morocco is increasingly becoming a country of destination. For instance, Tangiers is considered a turntable for human trafficking as it is an important transit hub as well as an important exploitation site (Human Rights Council, 2014). The medical organization MSF reported that half of the migrant women patients treated in Morocco were victims of human trafficking (MSF, 2013). In parallel, the number of Moroccans being trafficked to Europe for labour or sexual exploitation is also increasing. Between 2013 and 2014, 186 Moroccan victims were identified mainly in Italy, Belgium and France.

Moroccan authorities detected Nigerian, Congolese and Ivorian victims in the country. West-African victims are sometimes flown into Morocco (UN WOMEN, 2015). Recent evidence shows that Nigerian gangs compete for the control of sub-Saharan African men and women trafficking in Morocco. For many, the migration journey continues from Morocco to Europe. As described in certain cases: *“Some Nigerian women trafficked to Spain are “bought” by Nigerian madams based in that country, who will place a call to a trafficker based in Morocco who will then go to Nigeria to recruit them”* (UNODC, 2011).

Victims will then transit through Morocco and reach Spain through different means. The costs of the journey to Europe vary greatly depending on the mode of transportation. In the case of Nigerian trafficking networks, the most “precious” victims, in the trafficker’s perspective, are usually sent to Europe by plane. To avoid suspicion, traffickers can fly victims from Casablanca rather than directly from Abuja (Jimenez & Galvez, 2017). Traffickers control victims directly or via intermediaries during the entire migration route. When victims travel by plane to Europe, these are escorted by one of the members of the trafficking network until they are handed to a Madame or a pimp. The cost of the trafficking by air from West or North Africa to Europe, including flight and fake travel documents is between 6,000 and EUR 12,000 (Carling, 2005). However, women who are flown to the EU for sexual exploitation purposes usually incur debts that go up to EUR 40,000 for the journey. It takes several years for the victims to reimburse this ever-growing debt (Campana, 2015; UNODC, 2011).

The share of those who are flown from Morocco to Europe remains unavailable. However, evidence suggests that in most cases, the journey continues by land and sea to Spain and Italy (Carling, 2006; European Commission; 2016, UNODC, 2016). Trafficking networks operating in Morocco try to get victims into the Spanish enclaves of Ceuta and Melilla. Once the group is in Spanish territory, it will automatically be transferred to mainland Spain by the authorities. As the large majority of victims remain undetected, they are sometimes coerced into Spain and Europe’s informal sex industries (Dominguez & Galvez, 2017; Maleno Garzon, n.d.).

Aware of the rise of human trafficking through and Morocco, the government has approved measures aimed at tackling this issue. Authorities announced they thwarted 80 human trafficking rings in 2017. The effect of human trafficking in the country remains unclear, however, as the government made no distinction between human smuggling and human trafficking cases (Middle East Monitor, 2017; US Department of State, 2017).

#### 4.1.4. Document fraud

Document forgery and fraud is relatively prevalent in Morocco and is an essential part of the modus operandi for smuggling and trafficking operations in and from Morocco. Moroccan nationals represented the largest group abusing travel documents at European land, sea and air borders in 2014 and 2015, followed by Nigerian nationals. In 2017, Moroccan nationals were newly reported as



being the first nationality using document fraud in illegal border crossings to the EU or Schengen area, with a total of 803 cases reported at land, sea and air borders (Frontex, 2018). It is important to note, however, that not all document fraudsters may be smugglers' clients.

Conversely, migrants in transit in Morocco have also resorted to document fraud. For instance, in order to access the Spanish enclaves of Ceuta and Melilla, Algerians and Syrians have reportedly used counterfeit or look-a-like Moroccan passports and ID-Cards. Indeed, residents of Nador and Fnideq - neighbouring cities of Melilla and Ceuta, respectively- are allowed to access the Spanish enclaves without a visa. Similarly, Syrians have spent up to EUR 2,000 per person to purchase fake Moroccan documents in order to access the enclaves and seek asylum. Fake or look-a-like passports are provided by "mafias" or smuggling networks controlling access to Ceuta and Melilla (Reitano, 2015; Alberola & Merkle, forthcoming). Cooperation between Moroccan and Algerian mafias could be crucial in these operations, as documents were often forged in Algerian border cities (Elmadmad, 2008).

Document fraud can take up a wide variety of forms. Smugglers can provide migrants with forged documents, fraudulently obtained documents or misuse authentic documents by using look-a-likes (UNODC, 2010). According to the most recent data by Frontex (2018), passports and visas are, in most of the cases detected, authentic documents that are misused (look-a-likes). On the contrary, ID-cards and residence permits are most often counterfeits. In some cases, the fraud only involves a visa, in other occasions both the passport and the visa have been forged or fraudulently obtained. Alternatively, authentic documents can be rented out to migrants for use on a section of the journey, and then handed back to the facilitators upon arrival to the EU. In the case of Morocco, fraudsters have often been detected with Spanish, French, Belgian and Italian look-a-like ID cards, passports and even residence permits (Frontex, 2017b). These documents can then be reused several times to facilitate entry to different migrants, especially when these contain a Schengen visa (Europol-Interpol, 2016).

In other instances, document fraud does not concern identity documents but other complementary documents. For instance, where migrants can use their genuine passports, they can still rely on organized crime groups to obtain documents needed in visa applications or even asylum applications (Huddleston, Karakay & Nikolova, 2015). Documents such as work permits are also often counterfeited. Smugglers can also take advantage of migrants by selling fake work and residence permits. Upon arrival, migrants were either arrested or forced into labor or sexual exploitation (Elmadmad, 2008).

While document fraud is often used in the smuggling of migrants by land in Morocco, it is also an indispensable component of smuggling by air. At the EU level, 64.0% of all document fraud was detected at air borders. In 2017, 4,324 cases of document fraud were detected at EU air borders, indicating a 33.5% decrease since 2014 (Frontex, 2018). That same year, Dutch authorities detected 25 cases of document abuse for passengers travelling from Casablanca's Anfa and Mohammed V airports, whom used a total of 27 fraudulent documents.

#### 4.1.5. Policy, legislative and institutional frameworks

This section will provide an overview of the key national and international legislation approved by Morocco to combat trafficking in human beings, smuggling of migrants and document fraud. Most issues related to migration crimes in Morocco are regulated by *Law 02/03 relative to the entry and stay of foreigners in Morocco, irregular emigration and immigration*. The law came into force in

November 2003 and was the first law criminalizing smuggling of migrants as well as irregular sojourn in the country. In fact, this law was an important milestone in “decolonizing” migration legislation in Morocco as it unified and replaced an obsolete legislative framework inherited from the Protectorate (Elmadmad, 2010; Lahlou, 2015).

An important turning point in Morocco’s migration policy took place in 2013. Following a series of abuse towards migrants, several reports by UN committees and a thematic report by the National Council of Human Rights demanded changes in Morocco’s immigration policy and amendments to the Law 02/03. Following a Royal Decree, the government took action and set out the National Strategy of Immigration and Asylum in 2014 (known as SNIA), which focuses on four main areas: asylum; immigration; the fight against human trafficking and migrant and refugee integration (de Bel Air, 2016). This is one of the first comprehensive policies in Morocco to focus on the rights and integration of immigrants, and the first policy recognizing and taking action against human trafficking. Soon after, a new Department on Migration Affairs was created within the Ministry of Moroccan Residents Abroad and was tasked with the coordination and implementation of the new strategy (ibid.).

In parallel, a Mobility Partnership between Morocco, the EU and its Member States was signed in June 2013. The Mobility Partnership strengthens EU-Morocco cooperation in different areas of migration and particularly on “preventing and combating illegal immigration, people smuggling and border management” (European Commission, 2013). Most of the projects and funding within the Mobility Partnership have been directed to that specific area of cooperation (Den Hertog & Tittel-Mosser, 2017). Overall, the EU- Morocco Mobility Partnership is said to have largely influenced the development of national migration policy (Limam & Del Sarto, 2015, Seeberg, 2014; Carrera et al., 2016). Negotiations on the visa-facilitation agreement between the EU and Morocco are still ongoing since 2013, while negotiations on the readmission agreement are stalled since June 2010.

At the regional level, Morocco is also part of several migration dialogues and initiatives (Council of the European Union, 2013):

- The EU-African Migration and Development Dialogue (Rabat Process)
- The Euro-Mediterranean Partnership
- The 5+5 Dialogue
- The Global Forum on Migration and Development
- The ACP-EU Dialogue on Migration on the basis of the Cotonou Convention
- Readmission policy

At the international level, Morocco has signed the United Nations Convention against Transnational Organized Crime in 2002. Since then, the country has been committed to harmonize its internal legislation with this instrument. Later on, Morocco ratified the subsequent Protocol to Prevent Suppress and Punish Trafficking in Persons, Especially Women and Children, in 2009, although progress on this matter has been rather slow. The law 27/14 against trafficking came out recently and is starting to be adapted within Moroccan institutions. A Special Commission against human trafficking was ordered by a government decree in July 2018. The Ministry of Justice will be presiding the commission.

Contrary to most signatories of the CTO, Morocco has not ratified the Protocol against the Smuggling of Migrants by Land Sea and Air. Studies suggest this could be due to the lack of financial and human resources required to implement the provisions the Protocol; change in domestic laws, establish

mechanisms to protect rights of smuggled migrants, engage in international law enforcement and prosecution etc. (Schloenhardt & MacDonald, 2017). Legislative reforms on fight against terrorism, corruption, immigration and emigration, show that the Moroccan government is progressively setting up a system of prevention and prosecution of human trafficking and smuggling of migrants (Lautier, 2009).

Morocco has ratified the following international conventions against human trafficking, smuggling of migrants and document fraud:

- United Nations Convention against Transnational Organized Crime, signed in 2002.
- United Nations Convention on the Rights of the Child, ratified on 21 June 1993
- United Nations Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), ratified on 10 September 1993
- United Nations Convention against Torture, ratified on 21 June 1993
- United Nations Convention against Corruption, ratified in 2007
- United Nations Convention on the Protection of Migrant Workers and members of their family, ratified on 21 June 1992
- ILO convention on Minimum Age (no. 138), ratified on 6 January 2000
- ILO Convention on Worst Forms of Child Labour (no. 182), ratified on 26 January 2001
- Convention relative to the Status of Refugees of 1951, ratified in 1956 and the 1967 Protocol, which it adhered to in 1971

The institutional framework for migration governance in Morocco is relatively limited. The Delegate Ministry of Moroccans Abroad and Migration Affairs, within the Ministry of Foreign Affairs, is the main institution in charge of emigration and immigration policies.

The Direction of Migration and Border Surveillance (DMSF), attached to General Directorate of National Security (DGSN) within the Ministry of Interior, is the main operational body in charge of detecting and preventing migration crimes related to human trafficking, smuggling of migrants and document fraud.

### *Policy and legislative framework against human trafficking*

Although Morocco ratified the Palermo Protocol in 2009, it was not until 2016 that the country integrated the Protocol provisions in its domestic legislative framework (CNDH, n.d.). In 2013, an Inter-ministerial Commission was tasked with preparing a draft law against human trafficking (UN Women, 2015). The law 27-14 of August 2016 relative to the fight against human trafficking is the first national law to specifically incriminate trafficking in human beings (US Department of State, 2017). After several revisions with specialized international organization, the final version of the law has not been ratified to the date. However, the initiative has had important consequences for the identification and protection of victims of human trafficking. It creates a new legal frame for trafficking in human beings and enhances the access to public services for victims of trafficking. The law also foresees the creation of a national commission in charge of coordinating the government's action on THB.

The government of Morocco is still working on developing a coordinated response to this phenomenon and on the elaboration of a national Action Plan against trafficking in human beings

(EEAS, 2017). Efforts of the government to investigate and prosecute trafficking crimes are still limited. In consequence, unidentified victims among vulnerable populations remained at risk of penalization and re-trafficking. Moreover, the government does not provide yet specialized protection services specifically catered to the needs of trafficking victims (US Department of State, 2017, n.p.). Morocco currently needs to create the structures and procedures for an effective implementation of the Law 27-14. In 2018, a top judge emitted a circular to all national prosecutors to order a better consideration for victims of human trafficking in judicial procedures on prostitution and adultery.

The Penal Code of November 1962 was modified by several laws related to trafficking, exploitation and torture and encompasses all sanctions related to trafficking in human beings.

**TABLE 6. MOROCCO'S KEY LEGISLATION ON HUMAN TRAFFICKING**

Policy	Section	Content
Law 02/03, May 2003 relative to the entry and stay of foreigners in Morocco, irregular immigration and emigration	Art. 25 to 29	Foresees measures to protect certain vulnerable categories from expulsion. This concerns primarily migrant pregnant women and unaccompanied minors.
	Art. 51 - 52	Enunciates sanctions against all persons participating and profiting from irregular migration.
Law 27/14, August 2016 relative to the fight against smuggling and human trafficking	Art. 1	Incorporates into the Moroccan penal code precise definitions of human trafficking in line with international conventions on the matter, chiefly the Palermo Protocol (Articles 448.1 of the Penal Code). Incorporates new sanctions relative to trafficking in human being in the Penal Code (Art. 448.2 to 448.10). Sanctions vary from 10 to 30 years of prison and 5.000 to 1.000.000 dirhams depending on the severity of the crime.
	Art 2.	Completes penal procedural law 22-01, on the procedures to investigate and incriminate trafficking in human beings.
	Art 4-5.	Protects victims of THB and ensures reintegration
	Art 6-7.	Creation of the national commission in charge of coordinating the government's action on Trafficking in Human Beings
Penal Code, 1962	Modified by	Law 24/03 of November 2003 relative to the protection of children and women Law 43/04 of February 2006 relative to torture Law 27/14 of August 2016 relative to the fight against human trafficking. Law 19/02 of August 2016 relative to employment conditions of domestic workers
	Art. 231	Addresses all forms of torture and cruel acts, with aggravating circumstances if the acts are perpetrated against minors or if the act involved sexual violence
	Art. 470-472	Sanctions the abduction of a minor through violence, threat or fraud and the abduction of minors without violence threat or fraud. The latter cannot be sanctioned if the child abducted is a girl and she marries the abductor.
	Art. 485-486	Address violence against women and rape
	Art. 497-498	Address prostitution and pimping. Also addresses minors' prostitution.
	Art. 466-467	Address the sale and forced labor of children. Criminalizes the sale or purchase of children, with 2 to 10 years of prison and large fines
	Art. 448	Specifically addresses trafficking in human beings.
	Art. 293-299	Address criminal associations

Sources: Baba (2011), Elmadmad (2010), Lautier (2009).

## *Policy and legislative against the Smuggling of migrants*

Contrary to most countries in the region, Morocco has not signed nor ratified the *Protocol against the Smuggling of Migrants by Land, Sea and Air* supplementing the Convention against Transnational Crime Organizations. There are no official explanations for why Morocco did not ratify this Protocol. Schloenhardt & Macdonald (2017) identify several reasons for which non-state parties have not signed or ratified the Protocol, among which are the extensive costs and complexities associated with the implementation, as well as a perceived lack of incentives for the incorporation of the protocol into national legislation.

The Law 02/03 adopted in May 2003 on the entry and stay of foreigners in Morocco, irregular immigration and emigration unified previous legislation on irregular migration and harmonizes the existing legislation with the dispositions of the Penal Code (Baba, 2011). It is the main legal instrument criminalizing smuggling of migrants in Morocco. Jurisprudence shows that Moroccan magistrates have usually been quite severe with facilitators of irregular migration (Elmadmad, 2010). The law has been criticized for focusing too much on the securitization of migration and not providing enough protections for migrants found in irregular situation in Morocco, particularly minors. The law also criminalizes clandestine emigration of Moroccan adults and minors (Lautier, 2009).

Since 2013, more than 20 actions related to the fight against migrant smuggling have taken place.

**TABLE 7. MOROCCO'S KEY LEGISLATION ON THE SMUGGLING OF MIGRANTS**

Policy	Section	Content
Law 02/03, May 2003 Title VII.	Art. 42 to 47	Enunciates the sanctions for persons who enter or exit Moroccan territory in violation of the law or for those who overstay their visa
	Art. 48	Addresses the responsibility of transportation agents or companies who are involved in the infraction
	Art. 50	Addresses document fraud at borders
	Art. 51	Addresses sanctions for persons who assist irregular migration
	Art. 52.	Addresses sanctions for persons who organize irregular migration. The sanctions go from 6 months of prison to life sentence and from 50.000 to 1.000.000 dirhams depending on the severity of the case. In cases where smuggling has resulted in migrants' death; smugglers will be sanctioned with life sentence.

Sources: Baba (2011), Lautier (2009).

## *Document fraud*

Similar to smuggling of migrants, document fraud is mainly dealt with in the Penal Code and in the Law 02/03 on the entry and stay of foreigners in Morocco, irregular immigration and emigration. Although there is no specific national policy against document fraud, Morocco took part in several capacity building activities on fraud in travel document, in the frame of the EU-Morocco Mobility Partnership. An action on the *"Strengthening Moroccan Operational Capacities for the Verification of False Travel Documents"* is currently being implemented by the Spanish National Police in cooperation with the Moroccan DGSN (ICMPD, 2018).

**TABLE 8. MOROCCO'S KEY LEGISLATION ON DOCUMENT FRAUD**

Policy	Section	Content
Penal Code, 1962	Art. 360 to 367	Address all sanctions for fraud in identity documents, administrative

		documents and certificates.
	Art. 360	Addresses counterfeiting and falsification of any official document issued by administrative authorities. The penalty for this infraction goes from 1 to 3 years of imprisonment and a fine up to 1500 dirhams.
	Art. 361	Trying to obtain authentic documents through false attestation, false breeder documents or by taking a false name is also sanctioned. The penalty is aggravated when the fault is committed by a civil servant.
Law 02/03, May 2003	Art 50.	Sanctions persons who attempt to enter or exit Moroccan territory through air, land or sea by means of presenting fake or fraudulently obtained documents.

Sources: Baba (2011), Lautier (2009).

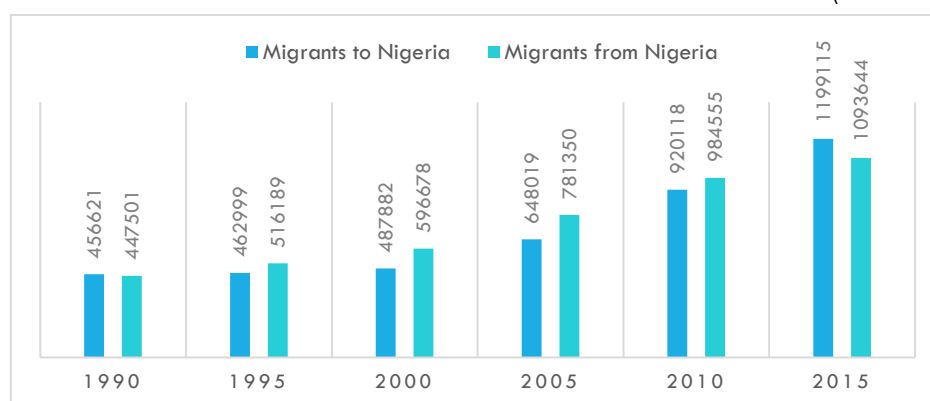
Morocco is currently in the process of adjusting its policy and institutional framework to tackle human trafficking, smuggling of migrants and document fraud and more broadly, setting the stage for becoming a migration transition country (de Haas, 2014). Despite being a country of transit and immigration since the last two decades, the Moroccan policy framework in the field of regular and irregular immigration is still very recent. Several shortcomings of Morocco's policy response have been highlighted throughout the report.

## 4.2. Nigeria

Nigeria is a country of origin, transit, and destination of international migrants. Migratory patterns in and from the country are complex, multifaceted and diverse. These are shaped by colonial ties, geographical proximity, and cultural practices such as nomadism, pastoralism, and pilgrimages to holy sites. Additionally, population pressure, the lack of fertile lands, unemployment, and the low per capita income have also contributed to migration in and from Nigeria (SIHMA, 2014). The preferred destinations of Nigerian emigrants in 2015 were the United States of America (22%) and the United Kingdom (20.0%). Migration to Europe accounted for 37.0% of the total and while the majority of Nigerian in Europe were residing in the UK (54.0%), other common destinations were Italy (14.0%), Spain (8.0%), and Germany (7.0%). On the other hand, immigrants in Nigeria are mostly from neighbouring states, primarily from Benin (29.0%), Ghana (19.0%), Mali (13.0%), and Togo (12.0%) (UN DESA, 2015).

Despite Nigeria being the most populous country in Africa and one of the most developed in the region, human mobility is rather low, at least if compared to the world's 3.0% average. As shown in Figure 4, in 2015, the immigrant population in Nigeria was lower than 0.7% of the total population, while the emigrant population represented 0.6% of the total (UNDESA, 2015). This relatively small diaspora is still vital to the development of the country, as it is mostly composed of highly skilled migrants. On one hand, the lack of professionals in various fields is causing a brain drain, which is negatively affecting the development of the country (Afolayan, Ikwuyatum & Abejide, 2009). On the other hand, this highly educated diaspora sends a considerable amount of remittances back home, representing 5% of Nigerian GDP (World Bank, 2018). Given the pivotal role played by the Nigerian emigrant population, diaspora policies are gaining momentum among Nigerian policymakers (IOM, 2014).

FIGURE 7: INTERNATIONAL MIGRANT POPULATION IN AND FROM NIGERIA BY YEAR (1990 – 2015)



Source: UN DESA, 2015a.

Aside from voluntary migration, forced migration from Nigeria is considerable in size. Internal violent conflicts are considered among the main push-factors for Nigerian emigration. Boko Haram started the latest internal conflict in 2009, which is portrayed as one of the worse intra-state crisis ever experienced in Nigeria (SHIMA, 2014). The regions of Borno, Adamawa, and Yobe in the North-East of the country are the most affected. At present, 7.7 million people in this region need humanitarian assistance. In total, up to 2.1 million people were internally displaced at the initial stage of the conflict and now most of them (1.7 million) are still living in a displaced situation. In addition, around 200,000 people have been forced to leave Nigeria and remain in Cameroon, Chad, and Niger (UN OCHA, 2018).

The forced displacement of Nigerians due to Boko Haram is not limited to the country and to the West and Central Africa region but also includes Europe. Nigerians were the top nationality of refugees entering Europe in 2016 through the central Mediterranean route (21% of the total). This trend continued in 2017, with Nigeria ranking first among sea arrivals to Europe (EPSC, 2017; UNHCR, 2017b). These numbers reflect an aggravated situation in Nigeria, in which suicide bombings and attacks on civilians by Boko Haram have doubled in 2017 as compared to 2016 (UNHCR, 2017c). It is important to note, however, that only 20.0% of the Nigerians that enter Europe irregularly by sea received refugee status in 2016.

In the context of humanitarian migration, it is relevant to note that Nigerian criminal organizations have abused the chaotic situation in northern Nigeria and Libya to increase their revenues through human trafficking and migrant smuggling. According to IOM estimates, around 80.0% of Nigerian women arrived in Italy by sea are being trafficked to Europe for sexual exploitation. In 2016, there has been a 600.0% increase in the number of potential victims of human trafficking entering Italy by sea (IOM, 2017). In addition, it is considered that, on average, more than 90.0% of irregular crossings to Europe have been facilitated by smugglers (Europol - Interpol, 2016).

### 4.2.1. Migrant Smuggling

Nigerian (ir)regular large-scale migration outside of Africa started in the late 1990's. The main determinants of this trend were considered to be national and regional instability coupled with a demand for low skilled labour in Southern Europe. The lack of appealing destinations in West Africa pushed potential Nigerian emigrants to other destinations, including Europe, the US, the Gulf States, and South Africa (De Haas, 2007b). Since then, irregular migration from Nigeria to Europe has

followed several trends. Nowadays, it mainly takes place by land and sea, with migrants crossing the Sahara and North Africa to eventually embark on a sea journey across the Mediterranean. Other ways of travelling include legitimate air travel to Europe and overstay of visa conditions; air travel through forged documents (either to Europe or to another country before taking a direct flight to Europe); and legal or illegal air travel to a country bordering Europe to then cross into Europe either by land or sea (Huddleston, Karacay & Nikolova, 2015). While irregular migration to Europe can happen without the help of a smuggling network, a third party often facilitates irregular movements (Europol-Interpol, 2016).

In a context in which increasing barriers to migration imposed by European states preclude the possibilities for regular migration, migrant smuggling should not be considered as the cause of irregular migration. *“On the contrary, the growing importance of smuggling is rather a response to increasing migration restrictions and repression”* (De Haas, 2007b, p.26).

### *Scale of smuggling by air from Nigeria to the EU*

The scale of migrant smuggling is hard to determine due to multiple factors mainly related to its illegal nature, and so is the scale of migrant smuggling by air (IOM, 2016b; UNODC, 2010). This is also the case when trying to assess the size of human smuggling by air from Nigeria to Europe for which quantitative data are lacking, if not missing. Nigeria is part of ECOWAS and as such, smuggling operations are considered limited in the country. ECOWAS citizens can move, reside, and establish themselves in any one of the 15 ECOWAS states more or less freely. For this reason, migrant smuggling is not a significant phenomenon in West Africa, nor a particularly lucrative business. Smuggling is therefore rarely a full-time occupation as migrants mainly travel within the region on air-conditioned busses or on private cars. They only rely on smugglers when trying to cross into Libya or Algeria, or when they organize air travels with fraudulent documents (Molenaar & Kamouni-Janssen, 2017; Huddleston et al., 2015).

The fall of the Gadhafi regime in Libya coupled with the “migration crisis” strongly reshaped the modus operandi and the size of human smuggling by air from Nigeria. While air routes were more frequently used prior to 2011, and especially prior 2000, air smuggling is now a minor phenomenon as compared to smuggling by land and sea (Huddleston et al., 2015; IOM, 2016b; De Haas, 2007; Carling, 2006). This is clearly illustrated by data on irregular entries to Europe recorded in the last years. These data show that most irregular migration from Nigeria to Europe happens via land and sea through the Central Mediterranean route connecting Libya to Italy and Malta. In 2016, an estimated 37,554 Nigerian migrants reached Europe by sea. This represented 20.0% of the total flow of irregular migrants from the central Mediterranean route and 7.0% of total irregular border crossings into Europe (Frontex, 2017). In 2017, the number of Nigerian irregular migrants entering Europe from the central Mediterranean route reduced to 18,100, representing 15.0% of the migrants using this route and 10.0% of the total arrivals by sea (UNHCR, 2017b). According to this figure, only 100 Nigerian migrants attempted to entry the EU irregularly by other routes.

Even if, at present, air smuggling is minor as compared to other means of traveling, this has not always been the case (De Haas, 2007b). Between 2010 and 2015, Nigeria was among the top six nationalities for refusals of entry at EU air borders, with between 1,544 and 1,719 refusals per year. Similarly, Nigeria was also among the top 10 nationalities for persons trying to enter Europe with fraudulent documents. In total, 516 people from Nigeria with forged documents were detected when trying to enter the Schengen area in 2014 (Frontex, 2014). In 2015, 520 Nigerians were stopped with forged documents at air borders. Yet, this trend is now declining, mostly as a result of the suspension of flights between Lagos (Nigeria) and Rome (Italy) in 2015 (Frontex, 2016).



### *Air routes utilised by smugglers in Nigeria*

Air routes are fluid and change constantly depending on policy interdictions and on the migrant smuggling network itself. Usually, air routes are part of a larger migration package that will employ different methods to bring the migrant to a given destination. Therefore, smuggling of migrants by air is generally considered an integral part of a broader smuggling strategy which relies on various transportation methods, chosen based on price and success rate (UNODC, 2010). In the case of West Africa and Nigeria air smuggling is mostly used as a full-package strategy.

In Nigeria, until 2006, obtaining real documents with fraudulent means was rather easy and this gave the opportunity of flying directly from Nigeria to any intended international destination. However, in the same year, forgery became more expensive and challenging due to the introduction of biometric passports. Also, this policy intervention prevented people from using the look-a-like/imposer method as e-passports have the fingerprint of the holder installed within them. Since the introduction of e-passports, air smuggling from Nigeria became more geographically diverse. Instead of flying from Lagos to Europe, Nigerian smuggled migrants changed *modus operandi* and begun to flight from smaller airports and other West African states. For this reason, it is challenging to make an exhaustive list of the most common air routes utilized (Huddleston et al., 2015), yet, there are at least three air routes or *modus operandi* that can be identified. The first directly connects Nigeria to the intended destination. The second links Nigeria to a country neighbouring the EU from which the migrants will attempt to cross into the EU either by land, air, or sea. Third, migrants will first travel legally to another West African country and then fly to their intended destination (Carling, 2006).

Despite the introduction of biometric passports, it seems that most Nigerian migrants still fly directly from Nigeria to their intended European destination. Mostly they do so with real documents and eventually overstay their visa. Those that travel irregularly are more likely to use a genuine passport with a forged Schengen visa (Huddleston et al., 2015).

Another route is from Nigeria to Istanbul, Moscow or somewhere close to the Eastern European border. From there, smuggled migrants will try to enter Europe irregularly via land, sea or air (Okojie, Eghafona, Vincent-Osaghae & Kalu, 2003; Prina, 2003; Smits, 2001). Small numbers of air smugglers are considered to be using the route through Istanbul also at present.

All in all, smuggling operations related to air routes are changing rapidly. Nigerian smugglers are now bringing their clients legally to other West African countries, like Benin, Ghana, or Togo, and then fly them to Europe with real documents fraudulently obtained from other nationalities. In this way, they can avoid the increased challenges linked to the biometric passports, and other restrictions that some European countries have put on Nigerian travel documents (Huddleston et al., 2015).

### *Characteristics of smuggling networks*

In 2016, there were three most used *modus operandi* to enter Europe irregularly for migrants of any nationality. First, the look-a-like method, in which genuine documents are used by imposters, or migrants use a genuine document fraudulently obtained. Second, forgery, meaning the alteration or modification of a genuine travel document is used. Counterfeiting, which involves the production of an entirely false document, represents a third method (Europol, 2017). Nigerians have been widely using all the aforementioned methods to different extents. Overwhelmingly, they travelled with original documents with forged visa or with fraudulent supporting documentation. Some have also used the technique of swapping boarding passes in transit airports. This technique consists in a person traveling with genuine documents to a given destination for which usually there is not a visa

requirement. However, instead of flying directly to the destination, the smuggled migrant would transit in a third airport. During the layoff time he would meet with a smuggler that would give him another boarding pass and false documents to reach another destination. Using counterfeit documents is rarely done as the ease of getting genuine documents through corruption strongly reduces the incentives to do so (Huddleston et al., 2015; Carling, 2006).

Nigerian smugglers offer a variety of services ranging from the provision of advisory services for border-crossings to the forgery of passports, visas and the provision of flight tickets (Altai, 2015). Some smugglers, for instance, first identify an international conference taking place in the desired destination country and later register their clients for the event, book a nearby hotel and pay the registration costs. All of this evidence is then used to support the visa application. Facilitators also train their costumers on the conference content, to enable prospect migrants to pass the interview for obtaining the visa (Huddleston et al., 2015). Fees for Nigerian passports can reach prices up to 1,000 USD, while in total the costs related to all the necessary documents can reach up to 3,000 USD (Altai, 2015; Carling, 2006).

Nigerian migrant smugglers are considered amongst the most successful in West and Central Africa. Successful Nigerian smugglers are able to position themselves in the middle of a transnational network. From there, they provide all the services mentioned above and are able to arrange payments in various parts of the world, including Europe, West Africa, and Asia. Migrant smuggling networks include a variety of actors, from embassy personnel to security guards in airports and border patrols (UNODC, 2011).

Smugglers get in touch with their future costumers in various ways. As reported by UNODC (2011), Nigerian smugglers have used fake travel agencies to publicise their services, but they also rely on social networks. Often, is the prospect migrant to reach out to the smugglers. Recently, there has been a tendency to offer smuggling services on social media platform too.

As opposed to land and maritime journeys that are characterized by the pay as you go method, air smugglers prefer the payment in advance. Potential migrants deliver a large sum to the smuggler who will take care of organizing air tickets, documents, and visa (forged, stolen, or fraudulently obtained) (Coyne & Nyst, 2017). This expensive option is a possibility that only a few migrants can afford (UNODC, 2011). In addition, the full-package smuggling service related to air operations can only be delivered by sophisticated smugglers. These situations together partially explain why air routes are unpopular as compared to other smuggling methods in Nigeria (Coyne & Nyst, 2017).

Information on the involvement of Nigerian migrant smugglers that facilitate migration via air in transit and destination countries is scarce. Evidence indicates the presence of Nigerian smugglers in Libya, Niger, Italy, and Morocco (Frontex, 2017; Huddleston et al., 2015; UNODC, 2011; Carling, 2006). Specifically, Nigerian connection men exercise a strong influence in Tangier (UNODC, 2011). However, it is likely that these individuals are solely linked to land and maritime migrant smuggling and are not involved in air smuggling.

#### **4.2.2.      Trafficking in human beings by air**

Although Nigeria is a source, transit, and destination country for victims of human trafficking (VOTs), human trafficking for sexual exploitation targets mainly international markets (Abiodun, George, Chukwuma, Gbenga & Iluno, 2017; US Department of State, 2017). According to Carling (2006), most traffickers in Nigeria do not usually fly VOTs directly from Nigeria to the intended destination in Europe but rather from another West African country, most notably Ghana. In this way, they will

attract less attention. The most used airports for human trafficking in Europe include London, Paris, and Amsterdam. From these cities, women are most likely sent to the Italian city of Turin by train.

Of the Nigerian women trafficked to Europe for the purposes of sexual exploitation and forced prostitution, 94.0% are from Edo State (Mberu & Pongou, 2010). Edo State, in addition to other southern States of Nigeria and particularly Benin City are amply recognized as main trafficking hubs. Human trafficking from those states to Europe is a well-known phenomenon. Many VOTs know that they will end up in sex work if they agree to travel to Europe. However, they are not aware of the slave-like conditions in which they will be working (Carling, 2005). The first connection between the trafficking ring and the potential VOT in Nigeria is generally mediated by a friend or relative of the victim who will put the victim in touch with a Nigerian madam. This central figure of the criminal group takes care of the organizational part of the journey. The average cost for travel documents is between 500 to 2000 USD, while the total travel costs are between 8,000 and 12,000 USD (Carling, 2005). The victim incurs a much higher debt, between 40,000 and 70,000 USD, and it usually takes three years to be paid back (Campana, 2015).

Nigerian trafficking networks are organized in small rings operating independently yet connected in a transnational chain which enables them to operate in every stage of the migration process and in various destination countries. As opposed to other trafficking networks, women, often referred to as 'madams', are widely present in the high ranks of Nigerian human trafficking rings. Madams lead the criminal organization by planning its activities and by giving orders to subordinates, coordinating the business, managing the sex workers, and controlling the revenues (Carling, 2006). As shown by Campana (2015), the Nigerian trafficking business model is based on collaboration between small groups and externalization. There is not one centralized authority but multiple, and while some are taking care of the transportation stage, others are taking care of the exploitation stage. The latter stage is a responsibility of the 'Madams' in Europe, who represent the demand side of the enterprise. The transportation stage is instead a Nigerian business. Another peculiarity of Nigerian trafficking rings is that they amply abuse the asylum system and encourage their victims to apply for asylum upon arrival at the destination to ease their transportation across multiple European destinations (Europol, 2016a).

Until recently, most human trafficking from Nigeria to Europe was done through air routes. Traffickers would fly their victims in groups of 2 or 3 to the intended European destination either from Nigeria or from a neighbouring state (Campana, 2015; Carling, 2006). A highly organized group could traffic as much as 200 girls per year into Europe (Campana, 2015). The trend observed since 2015 shows a different picture. An increasing number of Nigerian girls are trafficked into Europe by land and sea across the central Mediterranean route. At present, most trafficking in Europe from Nigeria seems to be happening in this fashion and air routes have possibly lost their relevance (IOM, 2017).

Connections between migrant smuggling and human trafficking have always existed in the case of Nigeria. For instance, in 2007, a highly organized smuggling ring based in Edo state, which was also extensively involved in trafficking in human beings into Europe was detected. The head of the criminal organization owned a travel agency to cover its business, a method which is often used by both migrant smugglers and human traffickers (UNODC, 2011). Moreover, the routes and methods used to smuggle migrants across the Sahara are the same as the methods used to traffic human beings, and very often a migrant can start the journey as smuggled but end up in a trafficking situation at some point (IOM, 2017).

The scope of human trafficking from Nigeria as well as the revenues that it generates are largely unknown. Until 2011, it was estimated that on average, 5,700 West African women, mostly from

Nigeria, were trafficked into Europe each year. At the time, air travel largely facilitated trafficking operations. It is estimated that in 2011 in Europe, there were between 11,400 and 17,100 VOTs from West Africa, representing a business of 228 million USD per year (UNODC, 2011). This is only a portion of the profits, as the total number of VOTs from Nigeria is much higher. If we also take into consideration victims trafficked to other West African countries, the Gulf States, and Asia, the number rises to around 10,000 people per year (Mberu & Pongou, 2010). By looking at more recent estimates on human trafficking from Nigeria it is notable that the numbers have increased dramatically. According to the latest IOM report (2017) on human trafficking along the central Mediterranean route, as much as 80.0% of the Nigerian women who reach Italy through this route are forced into prostitution in Europe. This estimate indicates that in 2016 alone, 8,277 girls were trafficked into Europe solely by this route. If this estimate is true, the actual number of Nigerian women forced in the European sex trade is much higher, maybe even double today as compared to what it used to be in 2011.

One of the latest developments related to human trafficking from Nigeria to Europe regards the abuse of the Italian asylum system and the growing connections between the Italian mafia and the Nigerian mafia 'Black Axe' (Nadeau, 2018; Tondo, 2016). Members of the Nigerian network living in Italy either in a reception centre or in a nearby city contact their victims as soon as they arrive at the centre. This prevents reception facilities from functioning effectively. Victims are then forced into prostitution in Sicily as well as beyond. The cooperation between the two mafias is a new phenomenon and it can lead to the creation of an unprecedented type of organized crime group with unpredictable consequences for Italian security and for the exploitation of migrants (Tondo, 2016).

### 4.2.3. Document fraud

Nigeria has a very high rate of document forgery and Nigerian migrant smugglers are deeply connected to document fraud. In Nigeria, it is relatively easy to get authentic documents with false or partially false information through corruption and passports are misused in various ways. Original passports are altered or issued with false information or by means of bribes. Often, they are produced solely on the basis of birth certificates. Multiple people often use the same genuine passport, especially when it has a valid Schengen visa. As soon as the first holder enters the EU he sends his passport back to Nigeria so that it can be used by as many people as possible. Even migrants owning a genuine passport can rely on smugglers to get the falsified additional information needed for the visa application (Huddleston et al., 2015; Carling, 2006). In the latter instance, reference letters and false bank statements are the most abused papers (De Haas, 2006). Sometimes migrants are frauded by smugglers who sell them 'world passports' which supposedly enable the owner to travel across every border (UNODC, 2011). Not only Nigerian migrant smugglers but also human traffickers have been linked to document forgery and counterfeiting (Campana, 2015).

The main challenge for airport authorities is that in most cases, Nigerian documents (passport, and visa) are authentic and only the documentation supporting the visa is fake. For this reason, it is not possible to identify irregular migrants simply by their passports (Carling, 2006). A deeper analysis of the whole documentation used for the visa application would be needed but this is rarely done. Even the introduction of chip-passports in 2007 did not solve the problem of document forgery. These new generation e-passports cannot be duplicated, as they have a microchip with personal information and biometric data of the holder. Yet, they can still be bought through corruption and then abused with a visa obtained through fraudulent supporting documents or corruption (Immigration and Refugee Board of Canada, 2013).

The revenues raised by the Nigerian migrant smuggling industry through document forgery and counteracting are unknown. However, some estimations are possible. Using available data, it is only possible to calculate the revenues of documents forgery in the last five years. This number, however, is only based on detected cases and therefore is surely underestimating the actual size of the business. The total costs to buy the necessary documents for irregular immigration is around 3,000 USD, while the number of Nigerian migrants stopped at EU external borders in the last five years is 2,039 (Huddleston et al., 2015; Carling, 2006). This represents a business of around 1.2 million dollars per year.

The use of forged documents by Nigerians migrants entering Europe has decreased over the last 5 years. Yet, it is not clear if this trend should be attributed to the measures taken by EU member states, to the increased controls in Nigeria, or to the shifting trend that sees an increasing number of Nigerian migrants travelling without documents through the central Mediterranean route. In the most recent Frontex risk analysis (2017), Nigeria does not figure amongst the top ten nationalities for document forgery, and this represents a decrease as compared to 2014 and 2016 (Frontex, 2014, 2016). To conclude, more information is needed in the field of document forgery in Nigeria and how that inter-relates with migrant smuggling.

#### 4.2.4. The Role of corruption

Corruption is embedded in migrant smuggling by air, land, and sea and is considered to be the main obstacle to the full implementation of the United Nations Convention against the Smuggling of Migrants. Instances of corruption connected to migrant smuggling can be found in every country. Immigration and border officers, police, consulate officers and embassy staff facilitate migrant smuggling in exchange for bribes or a share of the criminal profits. The UNODC (2013) infers that migrant smuggling cannot occur without a certain level of corruption. In the case of Nigeria, widespread corruption ranging from bribery to high-level embezzlement and has been widely documented. Corruption has been identified as one of the main constraints to access to education and to national development (Nwaokugha & Ezeugwu, 2017; Gilbert & Ebani, 2015; Martini, 2014; Lawal & Oluwatoyin, 2011). The 2017 UNODC survey on bribery in Nigeria indicates that households most frequently pay bribes to obtain public utility services such as water, electricity and sanitation. The second most commonly mentioned instance of bribery (13.6%) happen when members of the household try to obtain administrative documents, certificates, licenses and permits (UNODC, 2017). This evidence strongly suggests that the acquisition of travel documents is frequently marked by corruption.

The central role of corruption in air smuggling is unquestionable, yet information on it is rather general. Corruption of public officials working in immigration bodies is widespread. It is considered relatively easy for migrants who can afford it to buy genuine documents with the complicity of such authorities. This situation creates a major challenge to law enforcement authorities in identifying irregular migrants. In addition, corruption in the form of bribery has been reported to happen at airports. Sometimes, border guards are bribed to avoid looking too closely at certain documents (Campana, 2015; Huddleston et al., 2015; Carling, 2006). In an effort to reduce instances of corruption, especially at immigration offices, the Nigerian government has banned cash payments for passport processing since August 2017 (Inyang, 2017). Even if it is too early to assess the effectiveness of such a policy, it can be considered a step in the right direction that could possibly reduce the instances of genuine documents being obtained through corruption.

## 4.2.5. Policy and institutional frameworks

### *Policy and institutional framework to address human trafficking*

This chapter will provide an overview of the main national and international legislation signed by Nigeria to combat trafficking in human beings. At the international level, Nigeria has signed the United Nations Convention against Transnational Organized Crime in 2000 and has ratified it a year later, in 2001. This implies that Nigeria has ratified the two most important international conventions against migrant smuggling and human trafficking, namely the Protocol to Prevent Suppress and Punish Trafficking in Persons, Especially Women and Children, and the Protocol against the Smuggling of Migrants by Land Sea and Air (UNODC, 2018c). In total, Nigeria has ratified the following international conventions concerning human trafficking (Kigbu & Hassan, 2015):

- United Nations Convention against Transnational Organized Crime
- United Nations Universal Declaration of Human Rights,
- Convention on the Rights of the Child
- Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
- African Charter on Human and Peoples Rights (enforcement) Act
- Forced Labour Convention,
- Minimum Age Convention (no. 138)
- Worst Forms of Child Labour Convention (no. 182)
- ECOWAS Declaration and Plan of Action Against Trafficking in Persons.

At the national level, the National Agency for the Prohibition of Trafficking in Persons and Other Related Matters (NAPTIP), was established in 2003 and is the leading body in the fight against trafficking in persons.

On top of state-level laws, the most important laws against trafficking in human beings are the Trafficking in Persons (Prohibition) Law Enforcement and Administration Act (2003), and the Child Rights Act (2003) (IOM, 2014). Also, a memorandum of understanding has been made with Benin. Even if Nigeria is making significant efforts to combat human trafficking, corruption at the government and security forces level seriously constrains these efforts. Often, security forces are complicit with human traffickers or are traffickers themselves, yet the government is not doing enough to prosecute officials who committed such violations (US Department of State, 2017).

**TABLE 9. NIGERIA'S KEY LAW RESPONSES TO TRAFFICKING IN PERSONS**

Policy	Content
Trafficking in Persons (Prohibition) Enforcement and Administration Act (2003) <sup>5</sup>	The Act established the NAPTIP and its core responsibilities. As amended in 2015, it criminalizes all forms of trafficking in persons. The Act prescribes a minimum penalty of 5 years imprisonment and 3,290\$ fine for sex and labour trafficking offenses. These penalties are considered adequate when commensurate with other serious crimes.
Child Rights Act (2003)	It prohibits the worst forms of child labour, exploitation of children for begging, child marriage, child forced recruitment and child trafficking. The Act has 278 sections and is considered comprehensive. Section 274 states that the Act supersedes all other laws.
Constitution 1999	Provides protection against slavery, forced labour, sexual exploitation and compulsory labour. Trafficking in human beings violates sections 17, 34, and

<sup>5</sup> Full Act: [http://www.lawnigeria.com/LawsoftheFederation/Trafficking-in-persons-\(Prohibition-and-Enforcement\),-Administration-Act,-2015.html](http://www.lawnigeria.com/LawsoftheFederation/Trafficking-in-persons-(Prohibition-and-Enforcement),-Administration-Act,-2015.html)

	42 of the Constitution. These provisions are sanction oriented and do not pay attention to prevention and protection measures.
Criminal Code	Various sections of the Nigerian Criminal Code protect citizens against trafficking in persons, slavery and forced prostitution. Particularly, sections 223, 224, 365, 366, and 369. These provisions are sanction oriented and do not pay attention to prevention and protection measures.
Penal Code	Sections 275, 278, 279, and 280 of the Penal Code have similar provisions of the Criminal Code on trafficking. They contain provisions against slavery, forced labour, and sexual exploitation. These provisions are sanction oriented and do not pay attention to prevention and protection measures.
State Laws	Some Nigerian states have laws at the state level against trafficking in persons related crimes, particularly Edo state.
Immigration act 1963	Even if not fully related to human trafficking, section 1 (g-h) of the Immigration Act (1963) is prescribes the persecution of persons who procure young girls (under 13yo) for the prostitution business.

Source: Kigbu & Hassan, 2015; Nigerian Penal Code; Nigerian Criminal Code; Trafficking in Persons (Prohibition) Enforcement and Administration Act

### *Policy and institutional framework to address migrant smuggling*

In Nigeria, the Directorate on Irregular Migration of the Nigerian Immigration Service (NIS) is the entity overseeing migrant smuggling activities. At the international level, Nigeria has ratified the UN protocol against the Smuggling of Migrants by Land, Sea and Air. At the national level, the National Policy on Migration and Implementation Plan adopted in 2015 represents the most relevant legal framework for migrant smuggling. Table 3 presents an overview of the main duties of the Directorate on Irregular Migration and the main legislation in the field of migrant smuggling.

**TABLE 10. KEY NIGERIAN LEGISLATION ON THE SMUGGLING OF MIGRANTS**

Policy	Content
Immigration Act (2015) <sup>6</sup>	The Immigration Act is an overarching document that sets the legal framework for all the relevant migration-related policies. As such, migrant smuggling is a consistent part of this document.
Immigration Act (2015) section 61-63	Establishment of the Directorate of irregular migration, its powers, and functions. Amongst other duties, the division oversees the enforcement of anti-smuggling national and international legislations. It is also responsible for the coordination of other bodies fighting migrant smuggling, the investigation of smuggling offenses, and the prevention and eradication of migrant smuggling.
Immigration Act (2015) section 64	This part is on the prohibition of migrant smuggling. "No person shall, for purposes of financial or any other material benefit, by means of a fraudulent travel or identity document, procure the illegal entry of a person into or the illegal stay of a person in a country of which that person is not a national or permanent resident."
Immigration Act (2015) sections 65-75	These sections define the possible smuggling of migrant related offenses, from the smuggling act per se to the abuse of the smuggled person. It also contains offenses related to enabling illegal residence, and to the procurement of fraudulent traveling document or identity documents.
Immigration Act (2015) sections 76-80	Regulates the restitution and re-compensation for the smuggled migrant by the smuggler.
Immigration Act (2015) section 97	Establishment and Management of a Smuggled Migrants Trust Fund.
Immigration Act (2015) sections 98-101	These sections are on the appropriate treatment of smuggled migrants and on the protection of information, informants, and witnesses. For instance, a

<sup>6</sup> Full act: <http://lawnigeria.com/LawsoftheFederation/Immigration-Act,-2015.html>



	smuggled migrant cannot be discriminated against, it needs to have adequate health access and its identity need to be protected. In addition, smuggled migrants cannot be detained or persecuted. Informants and members of their family need to be protected as well.
--	--

Source: Nigeria Immigration Act, 2015

### *Policy and institutional framework to address document fraud*

The Nigeria Police Force Special Fraud Unit is the most relevant authority in the field of document fraud and counterfeit. The Penal Code and the Criminal Code are the core legal documents against document forgery. The Immigration Act (2015) also has one section specifically dedicated to documenting forgery, especially in the context of migrant smuggling. The existing laws are rarely implemented. According to a representative of the Nigerian Police Special Fraud Unit, *“the courts are not effectively applying the measures as provided by the law due to corruption and tribal sentiments”* (Immigration and Refugee Board of Canada, 2013). Table 4 details existing laws on document forgery and counterfeiting.

TABLE 11. KEY NIGERIAN LEGISLATION ON DOCUMENT FORGERY AND COUNTERFEITING

Policy	Content
Criminal Code Chapter 43 <sup>7</sup>	This chapter gives the main definitions of document forgery.
Criminal Code Chapter 44	This chapter includes the punishments relative to forgery and like offenses. Different documents and offenses have different punishments.
Criminal Code Chapter 45	This chapter gives the main definitions and punishments for the preparation for forgery. This would be punishments for people illegally having materials to produce official stamps, permits, or other documents of the Government of Nigeria.
Penal Code Chapter 31 <sup>8</sup>	This chapter of the Penal Code includes all the offenses and punishments related to counterfeiting and forgery. It foresees both monetary payments and imprisonment, depending on the entity of the crime committed.
Immigration Act, section 68	This section describes the offenses against procurement of fraudulent traveling document and identity document.
Immigration Act, section 81 - 94	These sections of the immigration act define and regulate the punishments for forfeiture of passports and other assets.

Source: Immigration Act, 2015; Nigerian Penal Code; Nigerian Criminal Code

### *Policy and institutional framework to address corruption*

In Nigeria, there are two main authorities responsible for anti-corruption matters: the Economic and Financial Crimes Commission (EFCC) and the Independent Corrupt Practices Commission (ICPC) (Anti-Corruption Authorities, 2018; Spaaibade, 2013).

The Economic and Financial Crimes Commission (EFCC) is an overarching entity. Its objective is to harmonize efforts against economic crimes (including corruption) and to fight those crimes holistically (Spaaibade, 2013). Special bodies of the EFCC include the Nigeria Financial Intelligence Unit (NFIU), and the Financial Action Task Force. Their responsibilities are mostly related to combating money laundry offenses (EFCC, 2018a). Carrying out such other activities as are necessary or expedient for the full, discharge of all or any of the functions conferred on it under the Act” (Spaaibade, 2013).

<sup>7</sup> Full Criminal Code: <http://www.nigeria-law.org/Criminal%20Code%20Act-Part%20VI%20to%20the%20end.htm>

<sup>8</sup> Full Penal Code:

<http://lawnigeria.com/LawsOftheFederation/PENAL%20CODE%20%28NORTHERN%20STATES%29%20FEDERAL%20PROVISIONS-ACT.html>



Both the EFCC and the ICPC have been found incapable of effectively curbing corruption due to a lack of funds, insufficient political support and inadequate leadership (Anti-Corruption Portal, 2017).

The two most relevant pieces of legislation addressing corruption are the Corrupt Practices and Other Related Offences Act and the Economic and Financial Crimes Commission Establishment Act. They are both described in Table 6. Other important legislation related to anti-corruption efforts are the Money Laundering Act (1995), the Money Laundering (Prohibition) Act (2004), the Advance Fee Fraud and Other Fraud Related Offences Act (1995), the Banks and other Financial Institution Act (EFCC, 2018b). In addition, the Criminal Code has several sections dedicated to anti-corruption (section 36: extortion by threats; section 49: secret commission and corrupt practices). Nigeria has also ratified the most important international conventions related to corruption; the United Nations International Convention against Corruption and the African Union Anti-Corruption Convention, both signed in 2003 and ratified in 2004 and 2006 respectively (Ogundipe & Exediaro, 2017). Overall, it is considered that the legal framework in place to fight corruption-related crimes is well articulated but is constrained by social norms and institutions. Hence, anti-corruption struggles can be only successful if policymakers are able to instigate a broad social change among Nigerians (Ocheje, 2017).

## 4.3. India

### 4.3.1. Overview of migrant smuggling in India

Although there is not a universal definition of irregular migration, usually every kind of movement in, to or through a given country without the proper documentation falls into this category. When this irregular process is facilitated by a third party in exchange for material gain, this is considered migrant smuggling (IOM, 2016a). According to the United Nations Office on Drugs and Crime (UNODC), migrant smuggling is the *“procurement, in order to obtain, directly or indirectly, a financial or other material benefit, of the illegal entry of a person into a State Party of which the person is not a national or a permanent resident”* (UNODC, 2018a).

Most smuggling of migrants from India to Europe and North America takes place with a combination of smuggling by air and overland. Irfan (2012) and Wells (2013) have indeed shown anecdotal evidence suggesting that, increasingly, Indian and Nepali migrants are smuggled to the United States. Most of the cases of illegal entry into the United States happen by land (route) via Mexico or Canada (Saha, 2012). Guatemala and Ecuador both introduced visa waiver schemes to Indian nationals in recent years, which are increasingly used as intermediary countries to enter the United States (Irfan, 2012; Saha, 2012). As such, the routes for irregular migration are varied, and might also include lesser-used pathways through the Gulf countries, of which the first leg of the journey happens in a regular manner processes (Raghavan and Jayasuriya, 2016a, 2016b; Saha, 2012; Yousef, 2013, as cited in IOM, 2016b). Europe might also be used as a pathway (transit) to South America and then later onwards to North America as section 5.3. show. Lastly, most of the migrants smuggled to Europe and the United States are asylum seekers who apply for refugee status.

Usually, at least one leg of the journey is always facilitated by plane (IOM, 2016b). Air smuggling is the area of human smuggling that presents the biggest challenges, as it is incredibly diverse and adaptable to policy interventions (Frontex, 2017). Facilitation by air is also expected to gain a prominent role in the future due to increased controls on land and sea routes and due to the increasing barriers to regular migration. Air smuggling is rarely the only mode of travel for irregular migrants and is usually part of a larger smuggling package that foresees transport by land and sea (EUROPOL-INTERPOL, 2016). The combination of the different smuggling methods will depend on

which routes offer the best success rates. Smugglers usually test different routes, adapt to policy interventions, and change their modus operandi flexibly. The evolving nature of this phenomenon indicates the need for a cohesive international response to counter it (UNODC, 2010).

### *Scale of smuggling by air from India to the EU*

The scale of migrant smuggling is hard to determine due to its illegal nature, and so is the scale of migrant smuggling by air (IOM, 2016b; UNODC, 2010). This is also the case when trying to assess the scale of human smuggling by air from India to Europe, for which quantitative data are considered insufficient (IOM, 2016b). Information of different sources usually presents very different pictures.

Empirical studies on irregular migration from India to the EU focus only on two Indian states: Punjab and Haryana as most regular and irregular Indian migrants in Europe are known to come from these states (Bhawra, 2013; Saha, 2012). Evidence of irregular crossings indicates that in 2010, more than 1100 Indian migrants were stopped at selected airports while attempting to migrate irregularly. Most cases were recorded in Mumbai (437), Delhi (415) and Chennai (132), which are also the major hubs for migrant smuggling by air (Saha, 2012).

There is no consensus on flow and stock figures of irregular migration from India. For instance, Saha (2009) estimates that every year there are more than 20,000 attempts of irregular entries of migrants originating from Punjab into Europe, while according to Bhawra (2013), and to Saha (2012) this number should be around 1,800. Similar discrepancies arise when looking at the stock of irregular migrants from India in Europe. Some figures from UNDOC (2015) indicate that this population is between 1.9 and 3.8 million, of whom between 430,000 and 618,000 living in the UK alone (UNODC, 2015). However, according to Pitkanen and Korepla (2014), who based their estimates on 2013 Eurostat data, the number of Indians irregularly residing in the UK was less than 10,000.

The data presented clearly illustrate that the actual scale of irregular migration from India is unknown. These discrepancies highlight the difficulties of obtaining precise estimates on human smuggling and irregular migration from India to the EU. Most studies that attempt to quantify this phenomenon can only rely on the irregular entries that are detected or refused in certain airports. It is not possible to make an accurate estimate on the number of successful attempts and therefore different sources present very different results.

Generally, it is assumed that smuggling networks have organized most irregular crossings of Indian nationals into EU countries, but to what extent exactly they did so is unclear (IOM, 2016b; UNODC, 2015). Evidence from irregular migrants residing in Canada indicates that smuggling services were used in 97% of the cases, and it is possible that figures for the EU are similar. This situation can be explained by the high complexity of organizing travel from India that requires forged travel documents, corruption of airport officials, and a transnational network that can help upon arrival and during transit (UNODC, 2015).

### *Air routes utilised by smugglers in India*

Air routes are fluid and vary constantly, depending on policy interdictions and on the organization of the network. Usually, air routes are part of a larger migration package that will employ different methods to bring the migrant to a given destination. Therefore, the smuggling of migrants by air

should be considered as an integral part of a broader smuggling strategy which relies on various transportation methods, usually chosen based on price and success rate (UNODC, 2010).

The airport of New Delhi is a major hub for smuggling by air. It is largely used for irregular migration by people from Punjab and Haryana states, and other parts of India, but also by migrants from for example Nepal, Bangladesh, and Sri Lanka (Saha, 2009, 2012).

Mixed-routes from India to Europe, where air smuggling is used as a part of a broader smuggling strategy, are frequently used and often include a transit in Iran, Turkey or Russia. From New Delhi migrants might also fraudulently travel to Tehran, either by land or by air, where they would eventually stay to collect the necessary money for the next leg of the journey to Europe (UNODC, 2015). Another common transit point to Europe is Turkey, with the cities of Ankara, Van, and Istanbul functioning as main smuggling hubs (UNODC, 2015).

Other routes used are those that link India to South America and then the USA. A highly organized smuggling network was able to fly migrants from Mumbai to Dubai in the UAE, and then to Ecuador, Venezuela, and especially Guatemala. Other smuggling networks used a similar route to smuggle migrants to the USA. They would bring migrants from New Delhi to Istanbul and then to Guatemala. From South America, irregular migrants would continue their journey by land through Mexico and then to the USA (Irfan, 2012; Marosi & Becker, 2011). As will be further explained in section 5.3., Europe is a popular transit hub as well for onward migration to South America and North America, especially Schiphol Airport in Amsterdam, the Netherlands.

Fees related to human smuggling vary substantially, depending on destination and the smuggling service used. As illustrated in the table below, estimates indicate that the highest fees are related to travel to Canada, followed by the USA, and the UK (IOM, 2016b). However, only a rough estimate of the profits related to this business can be made. According to Bhawra (2013), every year an average of 1,800 people from Punjab try to enter Europe irregularly (on the basis of criminal cases registered). Moreover, 73.3% of migrants smuggled to Europe from Punjab note the UK as their final destination. If these figures hold true, we can estimate that the value of human smuggling from Punjab to the EU is around 51,645,750 USD per year.

TABLE 12. ESTIMATED COSTS OF IRREGULAR MIGRATION FROM INDIA TO VARIOUS DESTINATIONS (USD)

DESTINATION	COSTS (USD)
EUROPE	15,000 TO 30,000
UNITED KINGDOM	22,500 TO 42,500
CANADA	65,000
UNITED STATES	25,000 TO 50,000
AUSTRALIA AND NEW ZEALAND	13,000

Source: IOM, 2016b; Verité, 2012; UNODC, 2015 as mentioned in UNODC, GLOSOM, p79; ICMPD, 2011; UNODC, 2015 as mentioned in UNODC, GLOSOM, p79.

### 4.3.2. Modus operandi of smugglers and characteristics of smuggling networks

Operations related to smuggling of migrants are extremely diverse. The various criminal organizations apply different strategies to smuggle migrants and use different routes and methods. In relation to smuggling by air, for instance, some smugglers use forged documents, others use fraudulent supporting documents, and some use real documentation as look-a-likes. In addition, other methods include using stolen passports, falsifying stamps and bio-pages, and identity documents like ID cards, driving licenses, refugee cards and others. Corruption is also frequently used in the smuggling of migrants by air, yet in very diverse manners. Some networks prefer to corrupt high level consular or airport staff, while others might prefer to corrupt cleaning staff or low-level policemen to avoid strict document controls (UNODC, 2010).

In 2016, there were three frequently used modus operandi to enter Europe irregularly. First was the look-a-like method, in which genuine documents are used by imposters, or migrants use a genuine document fraudulently obtained. The second was forgery, meaning the alteration or modification of a genuine travel document. The third was counterfeiting, entailing the production of an entirely false document (Europol, 2017a). Over the years, Indian smugglers have employed all of the aforementioned modus operandi to different extents, with the majority being related document/visa fraud. They also employed other methods, such as the exchange of boarding passes in transit airports (Bhawra, 2013).

In India, a migrant that wants to attempt an irregular migration to Europe by air with the help of a smuggler needs to transfer the payment to the smuggler at priori and in a lump sum. Families often have to sell their assets or ask for loans in order to collect the necessary money for the journey. In case of a failed attempt, most smugglers have a reimbursement policy and would reimburse the money, minus expenses, to the family. Alternatively, some smugglers provide migrants with a free second trial, sometimes to a different destination. The high degree of profit related to this business makes it possible for smugglers to provide such 'insurance' policies in 80.0% of cases (Bhawra, 2013; Saha, 2009). This modus operandi differs substantially from the ones of other migrant smugglers around the world.

The classic Indian smuggling network is composed of multiple actors involved in all the steps of the migration process – origin, transit, and destination. As shown by different studies, Indian migrant smugglers are involved in various activities, including the recruitment of migrants, the facilitation and production of travel documents, the coaching/training of migrants and sometimes the selection of the destination country (IOM, 2016b; Bhawra, 2013; Saha, 2012; Saha, 2009). The network usually has a chief agent, a number of sub-agents, low-level recruiters, transporters, corrupt government officials, airport staff or other individuals in key positions (IOM, 2016b). The top agents usually operate from New Delhi, other large Indian cities, or from other countries. It is challenging to prosecute a person that commits an offense outside India, as it requires special approval of the Central Government. The primary agent generally does not directly have contacts with migrants but instead operates with sub-agents and recruiters. These sub-agents and recruiters then actively seek out migrants in rural villages, selling them dreams and hopes rather than smuggling packages (Saha, 2012).

According to the United Nations Conventions against Transnational Organized Crime, *“Organized criminal group shall mean a structured group of three or more persons, existing for a period of time and acting in concert with the aim of committing one or more serious crimes or offences established in*

*accordance with this Convention, in order to obtain, directly or indirectly, a financial or other material benefit”* (UNODC, 2003). Consequently, Indian human smuggling networks, which are largely composed of more than 3 people, shall be considered organized criminal groups, at least normatively.

### 4.3.3. Trafficking in human beings by air

India is ranked tier 2 in the United States Trafficking in Persons Report 2017. This means that “the Government of India does not fully meet the minimum standards for the elimination of trafficking; however, it is making significant efforts to do so” (US Department of State, 2017). Estimates indicate that as much as 90.0% of trafficking in human beings in India happens internally, but India is also destination and transit country for human trafficking victims. Forced labour constitutes the primary purpose of internal trafficking. Men, women, and children are subject to bonded labour, forced agricultural work, begging, domestic servitude, and sex work. In total it is estimated that millions of individuals are victims of human trafficking in India (US Department of State, 2017; The Hindu, 2011). In 2016, 20,000 women and children were victims of human trafficking in India, a figure which represents a 25.0% increase as compared to the previous year in the number of victims, yet still dramatically underestimates the phenomenon (Bhalla, 2017). According to the global slavery index, in 2016, India was home of more than 18 million people living in modern slavery, representing 1.4% of the Indian population (Global Slavery Index, 2017). However, not all of them are victims of human trafficking.

Regarding trafficking of migrants by air, the UNODC (2013) considers the airports of Delhi and Mumbai as the most abused. The main destinations are the Gulf States, among which the UAE (particularly Dubai airport), Qatar, and Kuwait are the most relevant. Trafficking of Indian migrants to the EU seems to be less frequent, and mainly related to forced labor (UNODC, 2013a). Instead, trafficking to the Gulf States mostly involves the exploitation of children and women in the sex industry.

Often, air trafficking happens with the complicity of police officers and airport staff who turn a blind eye or provide fake stamps and forged visas to the trafficking ring. Forged or counterfeit documents are still widely used for transnational human trafficking and human traffickers commonly utilize illegal recruitment agencies to lure migrants into fake jobs abroad that eventually turn up into exploitative situations (Srivastava, 2017; Anand, 2015; UNODC, 2013a).

Little is known about child trafficking from India to the EU by air, the scope of this phenomenon, or on the profits and structures of the criminal networks behind it. However, recent investigations have shown that this business exists and that there is a pressing need for further research on the subject. In 2017, the Mumbai crime branch arrested another trafficking ring that was trafficking 12 to 13 years old Punjabi children into the EU. The modus operandi, in this case, was different, and so was the location, as they were operating from the Mumbai airport and not from Delhi. The trafficked children were accompanied in Europe by two agents of the organisation that pretended to be the children’s parents and used a fake passport for the child. According to one of the investigators, *“the passports were easily made as police verification is not done for minors and the accused would abuse this flaw in the system. The visa processing also was easy as minors aren't interviewed while obtaining the Schengen visa and this helped them further”* (Singh, 2017). Similar patterns of minor children being sent to Europe while travelling with ‘fake’ parent

were found during fieldwork in India, please see the Fieldwork Findings section on India for more information.

#### **4.3.4. Document fraud**

India is one of the countries with the highest number of visa applications globally. This factor dramatically increases the difficulties faced by the Indian immigration and consular office to detect irregularities. In 2008, they processed more than 27,000 immigrant visa applications and 756,000 non-immigrant visa applications. From March to August 2009, the Indian Consulate has verified 3,596 cases of non-immigrant visa fraud and 513 cases of immigrant visa fraud, mostly in the airports of Chennai (1237), New Delhi (949), Mumbai (809), and Hyderabad (523). The visas most commonly targeted were business visas, tourist visas, temporary worker visas, student visas, and artist visas. Fraud rings that produce fake documents are generally regionally based.

As illustrated in section 2.3 Indian migrant smugglers are heavily involved in document fraud. The use of forged documents, look-a-likes, fraudulent supporting documents, and counterfeit documents in the smuggling of Indian migrants by air is the norm rather than the exception. Fraudulent documents usually include passports, visas, identity cards, birth certificates, and supporting documents for the visa application. The latter is usually easier to produce and to alter, representing a consistent challenge to airport authorities (UONDC, 2015). For Indian migrant smugglers it is rather easy to provide forged visas to their customers. Saha (2009), found that forged visas of 41 different countries have been used in the period 2005-2008.

Dismantling a document fraud ring is usually rather challenging. Sometimes the size and the complexity of the network is very complicated, with multiple individuals being involved in the forgery of specific documents. The persons engaged in these kind of activities are often not criminals, but rather teachers, bank employees, and low-level immigration staff that every now and again provide a fake document to the network in exchange for money (Bhawra, 2013). In addition, Saha has indicated that unscrupulous intermediaries such as travel agents and brokers have exploited aspirant migrants, often using forged travel documents (2009). As section 5.3. will show, visa and travel agencies indeed play a crucial role in the context of document/visa fraud.

Since 2011, the Government of India has established fingerprint scanners and e-passport readers in all major airports (Jainl, 2011) and it is expected that they will soon introduce biometric screening as well (Sinha, 2016). Given that the Indian biometric data bank is the largest in the world (Doshi, 2017), it is not surprising that these methods are producing extraordinary results. Finger print scanners drastically reduced the number of individuals trying to leave the country without proper documents. In the case of the Ahmedabad airport this number dropped to zero (Jainl, 2011).

#### **4.3.5. Policy and institutional frameworks**

- **Policy and institutional framework to address human trafficking**

The primary Indian authority that deals with human trafficking is the Ministry of Home Affairs. The Ministry has set up a number of bodies, administrative measures and interventions in order to combat human trafficking, such as the 'Anti Trafficking Cell' (as a focal point for communication) and 'Anti-Human Trafficking Units (AHTU) that, among other responsibilities, organize Training of Trainers

(ToT) at the National, State and District levels (workshops for police officers and prosecutors) (Home Department, 2017).

The Anti Trafficking Cell was set up to deal with matters relating to the law enforcement response on trafficking in human beings. As such, the Cell holds regular meetings with the officers of the AHTU's of various (Indian) States and Union Territories (UTs), and issues suitable guidelines as such, in order to strengthen the law enforcement response in tackling human trafficking. It also acts as an interface with other (Indian) Ministries to address the issues of human trafficking (MHA, 2018).

There are 35 districts in India that have an Anti Human Trafficking Units (AHTU) in place and are notified by the state government as police stations for the entire district for registration and investigation of all cases relating to the crime of human trafficking (this in addition to the other police stations in the district). The objective of these AHTU are to "take up the crusade against all Criminal aspects of the crime of human trafficking particularly in women and children" (Home Department, 2017).

The Ministry has also set up 'Advisories' to improve the effectiveness and responsiveness of the law enforcement machinery. The various advisories that the ministry set up include the following (LAWNN, 2017; Ministry of External Affairs, 2016):

- Advisory for preventing crime of human trafficking
- Advisory on crime against children
- Advisory on missing children
- Advisory on Preventing and Combating cybercrime against children
- Advisory on Human Trafficking as Organized Crime
- Advisory on Preventing and combating human trafficking in India-dealing with foreign nationals
- SOP to handle trafficking of children for child labor
- Advisory on MHA Web Portal on Anti Human Trafficking
- Advisory for associating SSB and BSF in crime meetings

**TABLE 13. INDIAN NATIONAL LEGISLATION TO PROHIBIT HUMAN TRAFFICKING**

Policy	Section	Content
Constitution	Article 23	Prohibits trafficking in human beings and forms of forced labor.
	Article 39(e)	Ensures that health and strength of individuals are not abused and that no one is forced by economic necessity to do work unsuited to their age or strength.
	Article 39(f)	Protects childhood and youth against exploitation.
Indian Penal Code, 1860	366	Addresses kidnapping, abducting or inducing a woman to compel marriage.
	366A	Addresses procuring a minor girl.
	366B	Addresses importation of a girl below 21 for sexual exploitation.
	367	Addresses kidnapping/ abducting to subject person to grievous hurt, slavery.
	370	Addresses buying or disposing a person as a slave.
	371	Addresses habitual dealing in slaves.
	372	Addresses selling a minor for prostitution.
	373	Addresses buying a minor for prostitution.
	374	Addresses compelling a person to labor.
The Immoral Traffic		Prevents trafficking for commercial sexual exploitation.



(Prevention) Act, 1956 (ITPA)		
Criminal Law (amendment) Act, 2013		Provides comprehensive measures to counter human trafficking (including trafficking of children for exploitation in any form, slavery, servitude or the forced removal of organs)
Protection of Children from Sexual offense (POCSO) Act, 2012		Provides precise definitions for different forms of sexual abuse and sexual harassment.
Transplantation of Human Organs Act, 1994		Prevents commercial dealings in human organs.
Prohibition of Child Marriage Act, 2006	12	Addresses child marriage void, if after that the minor is sold or trafficked or used for immoral purposes.
Children (Pledging of Labor) Act, 1933	4 until 6	Addresses penalties for pledging labor of children (under 15 years).
Bonded Labor System (Abolition) Act, 1976	16	Compels a person to render bonded labor or forced labor.
Child Labor (Prohibition and Regulation) Act, 1986	3	Addresses child work in certain employments.
Juvenile Justice Act, 2000	2(vii)	Defines a child in need of care and protection as one who is vulnerable and likely to be trafficked.
	24	Addresses employment of children for begging.
	26	Punishes procuring juveniles for hazardous employment or bonded labor.
Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989	3(vi)	Addresses compelling or enticing a member of a Scheduled Caste or Scheduled Tribe.
	3(xii)	Addresses using a position of dominance to sexually exploit a Scheduled Caste or Scheduled Tribe woman.

At the international level, India is one of the few countries in the South Asian region that has signed and ratified the United Nations Convention against Transnational Organized Crime. The convention was signed in 2002 and ratified in 2011. This implies that India has ratified the two most important international conventions against migrant smuggling and human trafficking, namely the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, and the Protocol against the Smuggling of Migrants by Land, Sea and Air (UNODC, 2018c). In total, India has ratified the following international conventions concerning human trafficking (Thomas, 2011; UNHCR, 2003):

- United Nations Convention against Transnational Organized Crime
- United Nations Universal Declaration of Human Rights
- Convention on the Rights of the Child
- Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography
- Convention on the Suppression of Immoral Traffic and of the Prostitution of Others
- Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
- SAARC Convention on Preventing and Combating Trafficking in Women and Children for Prostitution and the SAARC Convention on Regional Arrangements for the promotion of child welfare in South Asia

According to the US Trafficking in Persons Report (2017) India does not meet the minimum standards for the elimination of human trafficking. However, the report acknowledges that the country is making efforts to do so. The main challenge is that the number of prosecutions of human trafficking offenders remained low even though the Indian government increased its law enforcement efforts. The current



policy framework is criticized for being unevenly enforced, with sentences varying substantially between individuals that committed similar crimes. Furthermore, the agreed penalties are not sufficiently stringent, and are not comparable with the penalties of other serious crimes. The deterrent effect of human trafficking penalties is therefore limited (US Trafficking in Persons Report, 2017).

- **Policy and institutional framework to address migrant smuggling**

The primary Indian authority dealing with migrant smuggling is the Bureau of Immigration (within the Ministry of Home Affairs), which was established in 1971 with the purpose of developing a secure and integrated framework to facilitate legitimate travel without compromising on national security (Bureau of Immigration, 2018). Multiple reasons explain the limited results achieved by this body in combating migrant smuggling, including gaps in the legal framework, limited political will, and corruption (Saha, 2012).

At the national level, India does not seem to have implemented a specific policy against migrant smuggling. However, the country has enforced the Punjab Prevention of Human Smuggling Act, 2012, which is a state level policy (Civilmentor Wordpress, 2014). The following table provides a brief description of its content.

At the international level, India has ratified the United Nations Convention against Transnational Organized Crime and its protocols on trafficking in persons and migrant smuggling (Thomas, 2011). To further address the issue of irregular migration, UNODC and the Ministry of Overseas Indian Affairs organized a consultation on promoting safe mobility and preventing irregular migration with the EU (UNODC, 2018d). This consultation addressed the criminal aspect of migration (e.g. smuggling of migrants) as well as the existing international instruments to support national efforts in combating migrant smuggling. Participants could share experiences, identify challenges and explore mutual cooperation opportunities in the hopes of building an effective policy environment that combats migrant smuggling on a global level (UNODC, 2018d).

In India, the existing legal framework is considered inadequate to address irregular migration overall. Although travel agents can apply for Recruitment Agency (RA) Registration (including travel services) through the eMigrate website of the Ministry of External Affairs (MEA) – Overseas Employment Division (MEA, 2013). There is, however, no proper legislation to penalize deceitful travel agents and official registration of such agencies is not mandatory, creating a major loophole in the national legal framework (Bhawra, 2013). Travelers can, however, register ‘grievance’ about a recruiting agent through the online Consular Services Management System called MADAD, which is also part of the MEA (MEA, 2017).

TABLE 14. INDIAN NATIONAL LEGISLATION TO PREVENT HUMAN SMUGGLING

Policy	Content
The Punjab Prevention of Human Smuggling Act, 2012	Provides travel agents with a frame to check and curb their illegal and fraudulent activities. It penalizes those that are involved in organized human smuggling.

- **Policy and institutional framework to address document fraud**

TABLE 15. INDIAN NATIONAL LEGISLATION AGAINST DOCUMENT FRAUD

Policy	Section	Content
Penal Code, 1860	25	Defines a person as doing something fraudulently if he or she does it with the intent to defraud.
	28	Defines a person to counterfeit who knowingly causes one thing to resemble another.
	420	Addresses cheating and dishonestly inducing delivery of property
	463 until 489E (Chapter XVIII)	Addresses offences relating to documents and to property marks.
	246 and 247	Addresses offenses relating to coin and government stamps. This chapter discusses some regulations on counterfeit.

The sections of the Indian Penal code (1860) are likely an insufficient deterrent to document forgery (a strategy extensively used by fake travel agencies) as the maximum sentence of imprisonment for such a crime is two years in length and is sometimes accompanied by a monetary sanction (Bhawra, 2013).

- **Policy and institutional framework to address corruption**

The primary Indian authorities that deal with corruption include the Central Vigilance Commission, the Central Bureau of Investigation and the state Anti-Corruption Bureau. Furthermore, the Directorate of Enforcement and the Financial Intelligence Unit (under the Ministry of Finance) are in charge of dealing with cases related to money laundering by public servants (PRS, n.d.).

At the international level, India has ratified the UN Convention against Corruption, 2004 (UNODC, 2018). Furthermore, India has established a trilateral India-Brazil-South Africa cooperation to address corruption (Reuters, 2018). At the national level, India has several policies against corruption in place, such as the Indian Penal Code, 1860, the Prevention of Corruption Act, 1988, the Benami Transaction (Prohibition Act), 1988, Prevention of Money Laundering Act, 2002, Public Service Rules, Lokpal and Lokayuta (Amendment) Act, 2016, Black Money (Undisclosed Foreign Income and Assets) and Imposition of Tax Act, 2015, Companies (Amendment) Act, 2017, Whistleblowers' Protection (Amendment) Bill, 2015 and the Foreign Contribution (Regulation) Act, 2010 (PRS, n.d.; Sagar & Kachwaha, 2013; Malik & Chandra, 2018). The following table provides a brief description of their content.



## Part 3: Fieldwork findings

### 5.1. Morocco

FIGURE 8. DETAILS OF CMN AIRPORT

Casablanca Mohammed V Airport (CMN)	
○	Operated by: Office National des Aeroports (ONDA)
○	Traffic in 2017: 9,357,427 Passengers (+8.6%)
○	Airport Ranking: 4 <sup>th</sup> busiest in Africa
○	Royal Air Maroc Headquarters
○	Top international routes:
○	Paris CDG
○	Paris ORY
○	Jeddah
○	Dubai
○	Law enforcement agencies present at the airport:
	Direction Générale de la Surveillance Nationale
	Gendarmerie Royale
	Douanes Marocaines

The mission to Rabat has been insightful to understand the challenges of Morocco's mixed migration context. However, detailed information on the scale of smuggling and trafficking by air as well as the technical challenges and needs at Moroccan air borders has not been obtained to the same extent as in other selected partner countries. Accessing data or qualitative information from the Ministry of Interior or the Direction Generale de la Surveillance Nationale (DGSN) – in charge of air borders- remains a major challenge for researchers as well as for EU law enforcement stakeholders present in Morocco.

With an ever increasing passenger flow, Casablanca airport is now the fourth busiest

airport on the African continent, ranked after the airports of Johannesburg, Cairo and Cape Town. The airport also hosts the Head Quarters of Royal Air Maroc, which is among the most connected airlines in Africa and which operates daily flights to European capitals. In 2017, the airport registered a record in passenger traffic, with close to 9.5 million passengers. Casablanca airport is also the second most reported last departure airport from Africa towards the EU/ Schengen area (Frontex, 2016).

There is presently one Spanish Liaison Officer posted at Casablanca airport, whose role is primarily to check returnee flights incoming from Spain every week and investigate fraudulent documents in outgoing flights to the Schengen area. **Casablanca airport is in the top-five departure airports of document fraudsters detected at EU air borders; although the numbers are still substantially lower than detections at Istanbul airport (Frontex, 2016).** Additionally, liaison officers noted that Casablanca airport has been under close surveillance in recent years due to cocaine traffic activities.

#### 5.1.1. Trends in smuggling and trafficking by air and document fraud

##### *Smuggling by air*

While smuggling by land and sea to and from Morocco is an increasingly significant phenomenon (IOM, 2018), experts interviewed all agreed that smuggling by air is possible, but not significant. One of the liaison officers interviewed mentioned that the substantial disparity in costs in Morocco inevitably leads irregular migrants to choose smuggling by sea; crossing the Gibraltar Strait costs around 1,000€ while the air package costs above 10,000€.

As confirmed by an ICMPD expert currently leading a long-term border management project with the Moroccan government “*air borders are not a priority right now*”. In 2018, the Western Mediterranean

land route transiting through Morocco became the most frequented Mediterranean migration route. Throughout the year, there were close to 35,000 irregular entries to Spain, 86% of which arrived by sea, while 14% arrived by land through Ceuta and Melilla (IOM, 2018)<sup>9</sup>. According to a UNODC expert, migrant victims of trafficking in Morocco report they travelled by land through Algeria. Several interviewees mentioned that Morocco's efforts against irregular migration have intensified in recent months and are concentrated in the North of the country (Tanger-Ceuta and Nador-Melilla).

According to the former Spanish Liaison officer at Casablanca airport, smuggling by air from Morocco to the EU remains relatively low and stable over the last few years. Contrary to Frontex predictions (2016), all liaison officers interviewed reported they have not seen a significant rise in attempts of smuggling by air in recent years. From the Frontex data presented in Table 2 (section 2), **there were 460 reported detections of irregular entries in flights incoming from Casablanca airport between 2015 and 2017**. Over 60 asylum-seekers of Turkish nationality used Casablanca airport as a transit airport on their way to Sweden in 2017. Aside from asylum applicants, Moroccan, Congolese and Sri Lankan were the main nationalities of migrants who travelled irregularly through Casablanca airport. Most of these irregular entries were detected and reported from Paris Charles de Gaulle and Rome Fiumicino airports. There were also four (4) facilitators travelling from Casablanca apprehended in 2017. Interestingly, three of the facilitators were women of French nationality.

According to several stakeholders, **Casablanca might not be a crucial hub for smuggling by air but rather a potential point of entry for facilitators, traffickers, and victims of human trafficking whom are staying in Morocco or continuing their route by land and sea thereafter**. As mentioned earlier, smuggling journeys involve several types of transportation and travel by air is usually used for one leg of the journey only (UNODC, 2018).

There are several reasons for which experts believe that Casablanca airport might be a hub of arrival rather than departure. One of them is the fact that Most West-African countries do not require a visa to enter Morocco for a period of 90 days and their capitals are connected with daily Royal Air Maroc flights to Casablanca. Indeed, nationals of Senegal, Mali, Niger, Guinea Conakry or Cote d'Ivoire do not need to request a visa in order to travel to Morocco. Citizens of Nigeria, Ghana or Cameroon, on the contrary, do need a visa for travelling to Morocco. Some interviewees explained that this difference in visa requirement to access Morocco created a market of fake Malian or Senegalese passports.

While free travel across the African continent is an important enabling factor of social mobility and development (Mukundi Wachira, 2018)<sup>10</sup>, experts noted that in some instances this visa-free disposition was abused by migrant smugglers and traffickers. Migrants are told that after arriving to Casablanca, they can easily go on from Morocco to Europe with a payment on arrival deal with smugglers, whom will help them cross the Gibraltar strait or access the Spanish enclaves, to a lesser extent. **In these cases, the first leg of the journey by air is regular and legal. Irregularity only intervenes when migrants overstay 90 days or if they attempt to travel further without a Schengen visa.**

However, no official data confirms the magnitude of this trend of migrants arriving regularly and moving on irregularly. The EU Delegation in Morocco highlights that there is no data available on the number of people overstaying the 90-days visa-free stay, which makes it difficult to have an overview of irregular migration in Morocco. This lack of information prevents international and EU stakeholders from coordinating their actions in combating smuggling and trafficking by land, air or sea.

---

<sup>9</sup> DTM med August 2018

<sup>10</sup> [https://ethiopia.iom.int/sites/default/files/IOM%20free%20movement%20africa%20WEB\\_FINAL.pdf](https://ethiopia.iom.int/sites/default/files/IOM%20free%20movement%20africa%20WEB_FINAL.pdf)

### *Trafficking in human beings*

Once again, there are no statistics on the incidents of trafficking by air in Morocco since there are currently no official measures allowing for the identification and protection of victims. Many International Organizations report, however, that Morocco is a source, transit and destination country for human trafficking. Sexual and/or labor exploitation is a reality to which migrants in transit in Morocco are particularly vulnerable. International organizations, local NGOs, and migrants report that unaccompanied children and women from Cote d'Ivoire, Democratic Republic of the Congo, Nigeria, and Cameroon are highly vulnerable to sex trafficking and forced labor in Morocco (US Department of State, 2018). Expert interviews in Rabat confirmed that, along with internal trafficking, the profile of the migrant victims are mainly young women between 18 and 30 years old and of West-African origin.

The same experts explained that the bulk of trafficking happens by land, according to most victim's accounts. However, one cannot dismiss the possibility that a small part of victims arrive by air. Nigerian victims, for instance, can be deceived by traffickers who hand them a fake employment letter based on which they can obtain a visa to Morocco and travel regularly by air. A UNODC expert also notes that in some occasions "fake travel agencies propose itineraries that are tailored to the traffickers needs". There is one daily flight from Lagos to Casablanca, which is operated by Royal Air Maroc.

**Although the law 27-14 against trafficking in human beings was adopted in 2016, judicial institutions and law enforcement agencies are only starting to adjust to this new directive.** A ministerial decree of July 2018 ordered the creation of a Special Commission against Human Trafficking, which will be headed by the Ministry of Justice. Experts explain that the institutional and operational framework to combat trafficking in Morocco is now in the process of being implemented. The head prosecutor of Morocco recently circulated a judicial order to enhance the focus on victim protection in cases of prostitution.

It is relevant to note that there is currently no specialized human trafficking unit within Moroccan law enforcement authorities and that there is no anti-human trafficking protocol in place at Moroccan international airports.

### *Document fraud*

What is perhaps a more established fact is the incidence of document fraud in Morocco. **According to Frontex (2018), Morocco is the first departure country of document fraudsters detected at EU border crossing points (land, sea and air) in recent years; with on average 800 detections per year.** This number is relatively low compared to the period preceding the introduction of biometric passports. Biometric passports are available in Morocco since 2009 but were made mandatory since 2015. The government is now planning on the introduction of biometric ID Cards.

Experts interviewed mentioned various kinds of document fraud techniques. Firstly, law enforcement agents in Morocco or at EU air borders have encountered cases of forged or counterfeit documents as well as impostor documents. A former liaison officer at Casablanca airport mentioned they occasionally encountered fake or forged residence permits and ID Cards from Italy, Spain and France to a lesser extent. KMar officers explained that all fraudulent Dutch documents detected in Morocco are sent to ECID document center in Schiphol for further examination. Additionally, officers also came across forged passports, in which the bio-page was replaced or that had fake entry and exit stamps from Italy, Spain, France and Germany or in which a fake Schengen visa was forged.

Secondly, **experts noted that “passport-rental” is an important modus operandi of document fraud in Morocco.** In a few instances, migrants who obtained a long-term Schengen visa or residency permit in the EU rented their passports to prospective migrants for a substantial amount of money. According to practitioners, exit stamps can be relatively easy to obtain. Through the impostor or look-a-like technique, passports can then be used by migrants to reach the EU. While passport rental was initially used for family members (brothers, cousins or kin), the profitability of the practice has expanded its reach and transformed it into one of the main document fraud trends in Morocco.

**Thirdly, while a number of falsified Schengen visas have been detected, EU state representatives in Rabat mentioned that fraudulently obtained genuine visas are one of the most common document fraud techniques in Morocco. The representatives stress that document fraud actually happens ‘upstream’.** Experts explain it is difficult to forge a visa into a passport; since 2001, Schengen visas have a readable band with biometric information. Obtaining a genuine visa fraudulently is more likely. **According to consulate members, the business of arranging fraudulent visa application files is thriving in the country.** These are files where some of the supporting documents -such as letters of employment, bank statements and admission certificates- are not genuine.

According to the Head of the Visa Section at the Rabat consulate, this is an increasing trend. Most EU countries’ consulates in Morocco have externalized their visa procedures for more than a decade now. The initial screening of applications is outsourced to companies such as VFS Global, BLS or TLS. The completed files are then reviewed at consulates, without a personal interview in the case of short-stay visas. In the case of the Netherlands, for instance, the visa application process is outsourced and regionalized. All applications are transferred from VFS Rabat to the Netherlands consulate in Accra, Ghana. While this process has organizational advantages, the country consulates loose discretion on visa decisions. In 2017, there 21,700 Netherlands visas issued in Morocco, a significant increase in comparison to previous years. However, the refusal rate remained stable at 20.0% since 2015. The visa procedure for the Netherlands is now going to be entirely digitalized, a change that entails as many advantages as risks regarding document fraud possibilities.

Exceptionally, organized crime groups assault freights of passports transported from one location to another. This happened in 2017, as a shipment of 71 passports containing Schengen visas were stolen from a secured vehicle *en route* between the Netherlands consulate of Nador and Rabat.

## 5.1.2. Main challenges of air border management: preliminary needs assessment

According to all liaison officers interviewed, security procedures at Casablanca airport are very thorough. Some even comment that the passport checks can even seem excessive. There are different layers of pre-boarding checks: passports are scanned with e-readers, checked manually at least three times by DGSN officers and at least one time by airline security personnel. The researcher's passport was checked five times at Rabat airport – when exiting Morocco- one of them through a document scanner.

### Passenger data management

FIGURE 9. MOROCCAN LANDING CARD FORM

digitalized procedures means that

upcoming potential risks and concerning air border security.

However, interviewees have highlighted that data management processes at Casablanca airport could be improved. The lack of air border management in Morocco is slower and less effective than in neighboring EU airports. Indeed, upon arrival or departure at a Moroccan airport, each passenger has to manually fill in a form with his or her personal data and place of stay, as shown in Figure 5. According to experts, it takes up to ten days for this data to be uploaded on the national immigration database.

In that sense, Moroccan authorities are planning to introduce API and PNR systems at international airports (Advanced Passenger Information and Passenger Name Record). This new data management system for airports is still in legislative phase. A ministerial commission has recently been created for that purpose and is headed by the Ministry of Interior. As part of the strategy 2021 of the Ministry of Interior, a data and risk analysis cell was created at Casablanca airport. This is a risk prevention unit where customs officers and DGSN officers look at coordinate their action

FIGURE 10.  
API AND PNR SYSTEMS

### What are API and PNR systems?

- An API system is an electronic communication system by which biographic data from a passenger's passport are collected by airlines and transmitted to border control agencies before a flight's departure or arrival at the airport of destination. If checked against watch lists and risk indicators, API allows law enforcement officials to know, in advance, whether inadmissible persons or suspicious profiles are attempting to enter their countries thereby allowing for a focus on high-risk individuals.
- A Passenger Name Record is a unique set of data, created whenever a reservation is made for a flight, consisting of information on all components of that reservation. Such data is provided by passengers at the time of booking, check-in or boarding.

PNR and API are analyzed concurrently by law enforcement agencies. While API data may serve to identify known criminals by using alert systems, PNR allows for a risk assessment of unknown individuals. Travel arrangements recorded as PNR data are used to identify specific behavioral patterns and make associations between known and unknown people.

An overview of the implementation of API/PNR across the world is available in Annex 3.

Sources: EPRS, 2015; OSCE, 2018

<http://www.europarl.europa.eu/EPRS/EPRS-Briefing-554215-The-EU-PNR-Proposal-FINAL.pdf>



## *Police cooperation*

The challenge underpinning all potential air border vulnerabilities in Morocco is that of international police cooperation. Concerning irregular migration, the EU member states' liaison officer generally explained that the lack of smooth communication with the Ministry of Interior and the DGSN was an obstacle to the efficient investigation and prosecution of transnational organized crime. According to one of the LOs, this is mainly due to the Moroccan legislation concerning police information exchange. The Dutch Liaison Officer in Rabat receives approximately 100 International Letters of Request per year to investigate criminal activities that take place between the Netherlands and Morocco. However, only a limited number of these requests get approval for investigation from the DGSN. Practitioners from other EU Member states had similar experiences. This is not caused by a lack of will of national authorities, rather, it is attributed to a preservative institutional and legislative framework on police cooperation.

On the contrary, Spain has a remarkable history of police cooperation with Morocco. The Spanish police liaison officer referred to "sister police forces"; the two polices have been coordinating their actions at land, air and sea borders for several decades now. This cooperation is particularly visible at the ports of Tanger (Morocco), Algeciras and Tarifa (Spain). Concerning air borders, there is presently one Spanish Liaison Officer posted at Casablanca airport, whose role is primarily to check returnee flights incoming from Spain every week and investigate fraudulent documents in outgoing flights to the Schengen area.

This productive partnership led to a joint action on document fraud in 2018. Based on the needs and gaps in technical capacity expressed by the DGSN, several trainings and study visits addressed at DGSN border officers took place at different border posts, among which the Adolfo Suárez Madrid Barajas International Airport. The action also provided the DGSN with a set of last-generation technical equipment. Altogether, 280 border officers received advanced training on the operational verification of travel documents. The action was qualified on both sides as a "great success" of police cooperation. In years previous years, the German cooperation had donated several document reading machines. Other best practices of police cooperation in Morocco take place in the frame of anti-drug-smuggling, mainly through the "Aircop" program run by UNODC, Interpol and World Customs Organization, as part of the European Cocaine Route Programme<sup>11</sup>. Within this programme, different EU states' police officers collaborate with DGSN and customs to improve drug-smuggling detection.

Additional to police trainings, some airlines also received training on air border security and document fraud. In particular, Royal Air Maroc airport personnel received training from the UK police force and by the DGSN itself.

Altogether, the opacity of certain Moroccan law enforcement agencies made it difficult to pinpoint needs and gaps in technical capacity at air borders. Police cooperation and information exchange is crucial to identify such gaps and design capacity-building actions accordingly. Smoother police cooperation at borders is even more crucial when it comes to investigating transnational organised crime activities between the EU and Morocco.

---

<sup>11</sup> <https://www.unodc.org/unodc/en/organized-crime/AIRCOP/2-aircop-project.html>

## 5.2. Nigeria

FIGURE 11. LOS AIRPORT DETAILS

<b>Lagos Murtala Muhammed Airport (LOS)</b>	
○	Operated by: Federal Airports Authority of Nigeria (FAAN)
○	Traffic in 2017: 6,360,000 (-5%)
○	Airport Ranking: 5 <sup>th</sup> busiest in Africa
○	Airline Headquarters: Arik Air and Air Peace
○	Top international routes:
○	○ Accra
○	○ Dubai
○	○ London Heathrow
○	Law enforcement agencies present at the airport:
	Federal Airports Authority of Nigeria
	Nigeria Immigration Services NIS
	Nigeria Police Force
	Nigeria Customs Service NCS
	National Drug Law Enforcement Agency NDLEA
	Economic and Financial Crimes Commission EFCC

During fieldwork in Nigeria, interviews conducted with numerous law enforcement agents provided the researchers with a good overview on the action, challenges and efforts of the Nigeria Immigration Services. Interviews with various services of the NIS were conducted at the Headquarters in Abuja as well as in Abuja and Lagos international airports. Additionally, interviews with the National Agency for the Prohibition of Trafficking in Persons (NAPTIP) provided with further insights on trafficking in persons by air.

Lagos international airport is the busiest air hub in West Africa, with more than 6.3 million passengers per year. The airport is ranked just below Casablanca airport as the 5<sup>th</sup> most frequented airport on the African continent. There are many different national authorities operating at Lagos airport. The officers of the Federal Airport Authority of Nigeria (FAAN) control access to the airport, while, NIS, the Nigerian Police, the Nigeria Customs Service as well as the National Drug Law Enforcement Agency (NDLEA) and the Economic and Financial Crimes Commission (EFCC) ensure border security for the passenger and cargo section.

### 5.2.1. Trends in smuggling, trafficking by air and document fraud

#### *Smuggling by air*

Lagos airport is not a main hub of last departure for smuggling by air towards the EU. According to the Frontex data in section 3, there were 26 irregular entries from Lagos airport to EU air borders between 2015 and 2017. Most entries were reported from Madrid and Paris CDG airports. While most irregular migrants on these routes had Nigerian nationality, seven were nationals of Cameroon. Lagos airport is not a main hub of last departure for smuggling by air towards the EU. Lagos airport could potentially be a first point of departure for nationals of Nigeria and Cameroon travelling irregularly to the EU on a combined route. From 2015 to 2017, there were 43 Nigerians apprehended at different EU airports and in a majority of cases they were travelling between EU airports.

From fieldwork in Abuja and Lagos, it appeared clearly that authorities are concentrating their efforts on the management of Nigeria's "porous" land borders. Refugees, smugglers, traffickers and victims easily cross in or out of Nigeria to Niger and Cameroon. The mixed migration dynamics in the North East of the country (Lake Chad basin) are particularly complex. The presence of Boko Haram in the northern states and particularly around Maiduguri results in the fact that national authorities have little to no authority over the border in that area.

Nonetheless, practitioners interviewed mentioned that smuggling and trafficking by air was a non-negligible trend a decade ago. Since the introduction of biometric passports in 2009 and their generalization a few years later, smuggling by air has been drastically curtailed. According to NIS officials, smuggling by air with fake documents is not common since it is easy for all citizens to obtain

an ECOWAS passport. Regular mobility is encouraged and irregular movement by air becomes unworthy. Additionally, officers mentioned that the Standard Operating Procedures for passenger check at Lagos and Abuja airport are very thorough and are framed within the 2015 Law against smuggling and trafficking in persons.

However, smuggling and trafficking by air can peak on special occasions. During the football World Cup 2018, Russia waved visas for all foreign supporters. As Nigerian airports were particularly busy and people travelled in large groups, authorities are suspecting that “syndicates” took advantage of the unusual situation to smuggle and traffic Nigerians via air routes to Russia and the EU. Several interviewees mentioned it is difficult to estimate the number of persons who overstayed or abused the “world cup” visa waiver. Trafficking authorities are also concerned with the fact that many Nigerians could have been deceived with false tickets and ended up in exploitation.

Altogether, the absence of data collection and analysis on cases of document fraud and smuggling detected at Nigerian airports does not allow for a precise estimation on the trends of smuggling by air. As detailed in the next sections, officers interviewed mentioned they had encountered forged visas (including forged Schengen visas), as well as passports with forged stamps.

### *Trafficking by air*

Trafficking by air from Nigeria is perhaps more common than smuggling by air. According to anti-trafficking agency, this is because trafficking by air can be more cost-optimal than smuggling by air. As a NAPTIP agent commented, syndicates will study the cost of moving a victim and decide upon what route minimizes the costs and maximizes the benefits. **While there are no official estimates on the magnitude of trafficking by air from Nigeria, an officer working at the Lagos airport access gates reported seeing groups of girls potentially being trafficked almost on a daily basis. Experts affirm that over a thousand girls are trafficked via air routes every year:**

*“On a yearly basis, not more than a 100 victims will be intercepted. But I can assure you that thousands move through the airport every year. The ones that are intercepted and brought to NAPTIP, it’s about 100 people” (Expert Interview, Lagos)*

**Since direct flights to the EU are highly expensive, organizers ‘break the journey’ with the use of transit airports.** Flying with companies such as KLM, British Airways or Lufthansa is not only riskier due to their strict anti-trafficking protocols and training; it is also much more expensive. If the air travel is divided in several segments, the cost of the journey decreases significantly. Experts note that if traffickers book flights for the victims, they would pay 250,000 (600€) Naira for transiting through two or three different countries rather than pay 800,000 Naira (2000€) for a faster route. NAPTIP officers worked on cases where the victims were flown to Casablanca airport and then took a connecting flight to Madrid Barajas airport. The airports of Cairo or Dubai were also noted as important transit airports used by traffickers. In their views, fragmented journeys reduce the costs and remove suspicion on their movements.

Trafficking by air from Nigeria is not mainly directed towards the EU. There are a myriad of trafficking syndicates in Nigeria and their ‘specialty’ varies per region. Only syndicates from Edo and Enugu organize trafficking for sexual exploitation from Nigeria to Europe. Trafficking syndicates from the North of Nigeria use trafficking by air with the purpose of labour exploitation in the Middle-East, particularly in Dubai; these are Muslim victims and migration for prostitution is much less accepted within that community. Events such as the Hadj, where thousands travel from Nigeria’s northern airports to Jeddah and Mecca are a good alibi for traffickers to get larger groups of victims to Gulf States.

**There are two main factors explaining the pervasiveness of trafficking by air in Nigeria; corruption and insufficient specialized training.** First, **small-scale corruption towards airport officers is an essential tool for traffickers.** While the government has made anti-corruption a priority on their agenda, the system of 'tips' to operational officers remains a practical reality across the country, including at airports. Airport officers explained corruption practices have been almost entirely eradicated in the last few years, however, other practitioners note that "compromised officers" remain an essential ally for traffickers.

*"Most times, the ones that are not able to settle [pay bribes] are the ones who will be brought to NAPTIP. If you have the money to pay the fee, fine you probably will be let go." (Expert interview, Lagos)*

Second, the lack of specific training on human trafficking is a main enabling factor of trafficking by air. **In many occasions, victims of trafficking travel with genuine passports and when the need arises, with genuine visas.** In these cases, NIS officers have no reason to stop persons from travelling. Anti-trafficking experts warn that **most airport officers are not trained enough to recognize first signs of trafficking.** On specific days, NAPTIP officers do profiling at the gates and usually end up pulling out between one or two people per flight for investigation. However, profiling activities do not take place on a daily basis. NAPTIP used to have permanent presence at the airport but the agency's duty card has not been renewed in the last year. Hence, NAPTIP officers intervene at the airport exclusively when they receive intelligence from NIS officers or from the public.

Finally, according to the officers, the tactic of traffickers is to come at the gate really towards departure time, at the time when all operatives are in a rush and therefore have less time to check the validity of document or profile the passengers.

### *Document Fraud*

Despite the fact that some victims travel with genuine documents, document fraud remains an essential part of trafficking by air. Experts gave examples where victims were flown to the UK and the US with forged visas. Among the common modus operandi is that of the replacement of the bio-page, to make the young victim seem older, as well as the impostor techniques. Document fraud officers mentioned that the look-a-like is one often used to travel to Europe, in their words, *"it's more difficult for European officers to distinguish between different black people that look alike"*. However, **one of the most used techniques is that of stamping the passport in order to make it look like the person has a good travel history.** As one NAPTIP expert notes:

*"When you ask the person 'how did you travel to Dubai last time?', she can't explain. She doesn't know at all. So this is information that was made up, on the passport, to make as if the person has a good travel history, in order to avoid being stopped and asked questions." (Expert Interview, Lagos)*

**Fake stamp endorsements are also used in the process of fraudulent visa applications.** In the same spirit, stamps are forged into passports to increase chances of obtaining a visa. Similar to the case of Morocco, fraudulent visa applications are often encountered. Document fraud officers report that victims are even trained by traffickers to tell the right story when the visa process requires an interview. According to the Netherlands consulate in Nigeria, the visa refusal rate is high (50.0%) because of doubts on the support documents encountered, mainly regarding bank statements. Several embassies had to open "document certification" unit.

Document fraud is a decreasing but still pervasive issue in Nigeria. In turn, document fraud is the main enabling factor of smuggling of migrants as well as human trafficking by air. Officer's views on the main challenges in combatting document fraud are presented in the next section.

## 5.2.2. Main challenges of air border management: preliminary needs assessment

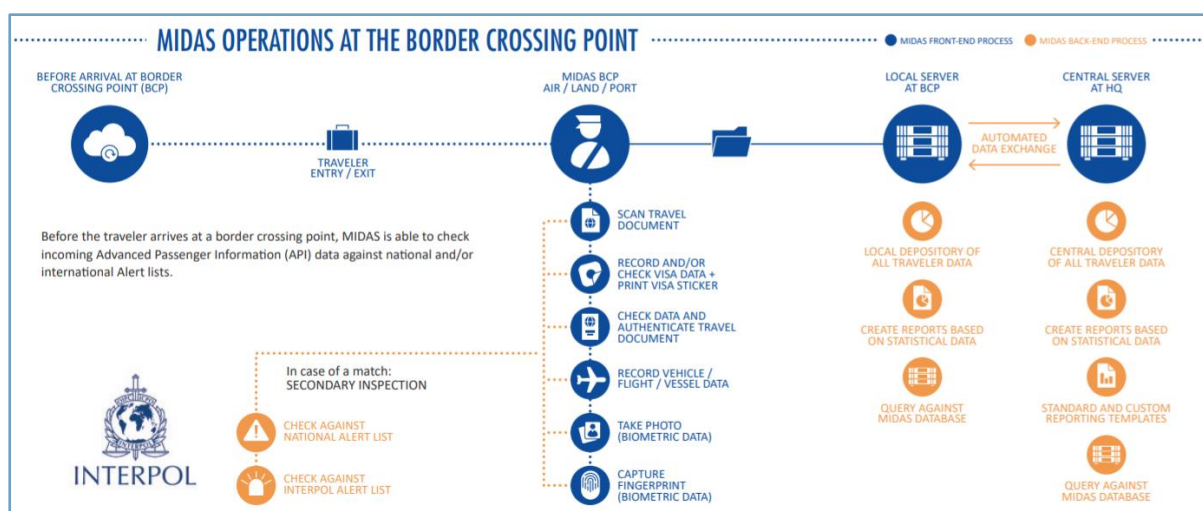
### *Border data management*

The main challenge of air border management at Nigerian airports is that of data collection and data management. Contrary to land borders, NIS units at air borders do use an electronic border data system in which passengers at the border crossing point is registered into a database. The API system is also in place at Nigeria air borders. However, the NIS airport database is not automatically synchronized and centralized with other BCPs and the NIS headquarters. From the several interviews with experts at the airports, it remains unclear whether this database is checked against national and international watch lists in real time (such as INTERPOL watch lists). The system currently in place is implemented by a private service provider that is considered to be inefficient and expensive.

The NIS is very much aware of the potential for improvement at air borders and is currently working closely with IOM in order to implement a new Migration Information and Data Analysis System (MIDAS) at all its borders, including at Nigeria's five international airports: Lagos, Abuja, Port-Harcourt, Enugu and Kano. MIDAS is a Border Management Information System (BIMS) that systematically collects, stores and analyses traveller's information across a border network and checks it against national and international alert lists. The system will allow the NIS to record and collect all different types of biometric data and synchronize it across the network, thus improving risk management at air borders (see Figure 6 below).

The implementation of MIDAS is currently in an early phase; in August 2018, IOM conducted a needs assessment at the airports of Lagos and Abuja.

FIGURE 12. IOM'S MIGRATION INFORMATION AND DATA ANALYSIS SYSTEM



### *Infrastructure and network challenges*

IOM's recent needs assessment also detected some of the main weakness at Nigeria's air borders. For instance, some specific airport terminals are not equipped with any sort of computers or document readers. In these terminals, passengers are not subject to security screenings. Another important

shortcoming of the international airports is that of poor electricity infrastructure. This is a widespread challenge throughout the country that does take an important toll on airport security. This means that the electronic systems are sometimes switched off and data can occasionally be lost.

IOM and airport officers also agree on the fact there is a simple problem of space at the airport. It appears that there is no sufficient space to store all the servers needed. In the case of Lagos airport, officers also mentioned there are not enough passport check desks and security gates and the large number of passenger agglomerates in two or three lines, creating a sensation of disorder.

More importantly perhaps, airport officers highlighted the issue of relatively poor network connection. This can have an impact on the effectivity of security procedures. An officer explained that when a document is scanned, depending on the network connection, it can take up to five minutes for the computer to process and double check the document's information. When there is a large queue of 200 people waiting to board a plane, officers will hurry up at just check the documents manually. Poor network connection can also be an issue for communication within the airport and between terminals and thus undermines security procedures.

### *Document fraud training and equipment*

Document fraud experts working at the NIS headquarter as well as at Lagos airports explained that along with data management, there were also human and material capacity gaps that undermine the efficacy of the NIS in combatting smuggling and trafficking by air. Officers explained that while document fraud specialized units in the NIS are important, more should be done to improve the detection capacity of all NIS officers at border crossing points. Given than organized crime group adapt their document fraud techniques and modus operandi fast, officers explain that *"training and re-training of operational level officers is crucial"*. There are currently five members of the document fraud unit posted at Lagos airport. Officer explain that more personnel is not necessarily required at the moment but rather more knowledge on document fraud detection across the NIS personnel.

Document fraud officers also report that the equipment at their disposition is often obsolete. In some occasions, document fraud equipment was provided to DF units without sufficient training and such equipment could never be use. This is the case of computers and ID readers donated by Germany and which were never used because these are still set-up in German language. The document fraud team identified equipment that needs to be renewed or acquired for the airports units:

- Mobile UV document scanners
- VS-600 Passport reader
- Finger prints equipment
- Iris recognition equipment

### *Inter-agency rivalry and corruption*

Different law enforcement agencies interviewed throughout the fieldwork reported that inter-agency rivalry was an important issue that could be undermining the efficiency and rapidity of security procedures at Nigerian airports. There are many different agencies present at the airport; the NIS, Police, Customs, Narcotics (NDLEA) and the Financial Crimes Commission. Some of these can have overlapping mandates and have a tendency to compete on certain cases. NAPTIP experts explain that this is one of the reasons why their duty card at the airport has not been renewed for the past year. One of the officers gives his view on the matter:



*“We have information that some law enforcement agencies don’t want NAPTIP to be there, because when we were there, we were successful in arresting some of the officers involved in cases of trafficking and in demanding further investigation. So, if somebody at the airport is involved, we could expose them. So there is really this problem of inter-agency rivalry, not wanting NAPTIP to be present at the airport.”*

As mentioned earlier, corruption is one of the major obstacles to efficient air border management. While corruption at the airport is not automatic, the systems of “tips” proposed to or requested by officers is still in place. FAAN officers interviewed reported they were offered substantial amounts of money in exchange for smuggling drug into Lagos airport.

### 5.2.3. Best practices

Migration and border management is an important issue on Nigeria’s policy agenda. Several law enforcement agencies are implementing positive initiative in that regard.

- The Joint Border Task Force (NAPTIP, NDLEA, EFCC)  
This is a task force that regroups NAPTIP, the National Drug Law Enforcement Agency as well as the Economic and Financial Crimes Commission. It was set up to enhance the exchange of intelligence and coordination during joint operations at the borders. The task force follows the structure of the UK’ National Crimes Agency. Members of the group receive regular training from international peers, for instance, in August 2018 these received training by the FBI.

FIGURE 13. AN ANTI-CORRUPTION SIGN LOCATED NEXT TO THE DOCUMENT CHECK DESK AT ABUJA AIRPORT



- The ECOWAS Centre of Excellence in Border Management

The NIS very recently proposed the creation of an ECOWAS border management training centre in the North-West of Nigeria (Tuga City). The initiative is aimed at hosting trainings for different immigration and law enforcement agencies from across ECOWAS member states in order to exchange best practices and diffuse high standards in border management. The centre is envisaged mainly for land border management.

- The “Passport to safe migration” initiative  
Education and awareness raising are key in the fight against irregular migration. In collaboration with IOM Nigeria, the NIS has distributed booklets across the country which contain information on the rules of international and the risks of smuggling and human trafficking. The booklets take the shape of an ECOWAS passport. These are short but informative and list all the resources migrants in risk can reach out to.

## 5.3. India

Delhi Airport is India's busiest airport for passenger traffic and was ranked 16<sup>th</sup> busiest airport in the world for 2017 by Airports Council International (ACI, 2018). The airport has its own Foreigner Registration Office in place (FRO), which is the primary agency to regulate the registration, movement, stay and departure in India. The Bureau of Immigration (BoI) is also present at the airport. To strengthen the Immigration system, the MHA/BoI has undertaken a modernization program – Mission Mode Project on Immigration, Visa, Foreigners' Registration and Tracking (IVFRT)–, with the assistance of National Informatics Center (NIC). The modernization program ensures that the Indian Missions, Immigration Check posts (ICP's), FRO offices are being computerized and networked, in order to develop a secure and integrated delivery framework to facilitate legitimate travellers.

FIGURE 14. DEL AIRPORT DETAILS

Delhi Indira Gandhi International Airport (DEL)	
○	Operated by: Delhi International Airport Limited (DIAL)
○	Traffic in 2017: 63,451,503 passengers (preliminary)
○	Airport Ranking: 16 <sup>th</sup> busiest in the world
○	Hub for: AirAsia India, Air India, Alliance Air, GoAir, IndiGo, Jet Airways, Quickjet Airlines, SpiceJet, Vistara, Zoom Air
○	60 airlines connecting 59 scheduled international destinations
○	On an average day: 585 flights carry 62,600 passengers
○	Among top international routes:
○	○ Dubai
○	○ Singapore
○	○ London
○	Law enforcement agencies present at the airport:
○	○ Airport Foreigner Regional Registration Offices (AFRRO)
○	○ Bureau of Immigration (BoI) / Ministry of Home Affairs (MHA)

### 5.3.1. Trends in smuggling, trafficking by air and document fraud

#### *Cultural Background: Visa Agency Culture*

The majority of Indians go through an agent to apply for a visa and pay a fee for their service rather than choosing the option of doing the visa application online. Although the vast majority of travel agents run a legitimate business, others may engage in irregular activities such as providing false documents, or submitting false supporting documents for the visa application process. Although estimates vary, ILOs noted that less than 10.0% of the visa and travel agencies in India are registered. Meaning that the majority of agencies cannot be inspected and their activities not checked. Some agencies might for example assist applicants by supplying certain missing documents or qualifications, which involves paying a fee for that service, also referred to as 'fraudulently obtained visas'. There are a whole range of irregular activities agents may engage in, depending on how much the applicant pays. The UK ILO refers to these irregular practices of visa and travel agencies as 'facilitation' rather than smuggling. **Fraudulently obtained genuine visas is the main modus operandi for irregular travel by air.**

ILOs in Delhi are currently trying to tackle this issue, however, it is difficult to trace the chain and discover where agents get the fake visa supporting documents from and where they are fabricated. Experts, however, expect that it requires more than one person to commit this kind of crime and that hence, there is a network behind it. When ILOs do find an agent that has been supplying false



documents to support visa applications, the case is referred to the Indian Authorities, the police, for further investigation.

It is clear that irregular travel and visa agencies are concerned with making money and as such actively recruit customers. There are cases of ignorant visa applicants that were not aware of the fact that they had fraudulently obtained a visa. However, as applicants have the ultimate responsibility it is necessary that they are well informed. A specific example of this is the case of approximately 30 Bangladeshi with fake Dutch visas obtained through an agent in Delhi. When they had their documents checked at the Dutch embassy the documents indeed proved to be fake (from RQ Jan-Mar 2018). A similar case was reported at the Swiss embassy, in which an Indian applicant only later found out his Swiss visa was fraudulently obtained. The agency had provided all the fake supporting documents for the application, for which he paid around 5000€ (350.000 rupees). All in all, misinformed migrants are likely to fall into the trap of fraudulent businesses.

VFS Global is the largest visa agency in India, and largest outsourcing specialist worldwide. The company manages the administrative and non-judgmental tasks related to visa, passport, identity management and other citizen services for its client government. The researcher had a look at their practices when visiting VFS' visa application centre in New Delhi. During high season (April-June) the centre receives about 2200 to 2400 applications per day. During low season this number remains around 800 to 1100. Due to the large amount of applications they receive, most of the European embassies in New Delhi outsource their visa procedures. Currently 19 of the Schengen embassies in Delhi outsource their visa processes. The top 5 Schengen 'application countries' at the VFS centre in Delhi are: 1. France, 2. Switzerland, 3. Italy, 4. Germany and 5. Czech Republic.

VFS Global does not play any part in the decision-making process of visa applications being granted or denied. The company solely executes the visa application procedure by following the checklist as provided by the embassy. As such, VFS checks whether the application file is complete and whether the provided documents are in good condition, but does not check the authenticity of the documents. In case VFS encounters or suspects document fraud they do, however, place a note to the respective embassy.

### *Visa Shopping*

ILOs indicated 'visa shopping' as another challenge in tackling main irregular migration by air. Although prospective migrants acquire their visa legitimately, the visa issuing country might not be their destination country and migrants are likely to continue their travels in an irregular fashion, for example by misusing their Schengen visa. As such, migrants might apply for visas with different European embassies, for example, if one embassy refuses to issue their visa, they try at a different one. They might also try different embassies to see where visa procedures are less strict. For instance, there was a case last summer in which passengers were holding a Schengen visa issued by the Netherlands, but intended to travel elsewhere in Europe. Consequently these passengers were offloaded. The UK ILO confirmed visa shopping as a *modus operandi* for Indians wanting to go to the UK. There had namely been cases of applicants that were denied a UK visa, but then got a genuine Schengen visa to travel legally to the Schengen area, but continued their travel to the UK illegally. This *modus operandi* was also confirmed by the ECID expert.

One of the ILOs mentioned that France is known for its relatively 'easy' visa application processes and that Germany offers quite a lot of trade fair visas which make them attractive 'targets' to apply for a visa. Bigger embassies, such as the German and Swiss embassy, are also attractive targets for visa shopping as they are generally more busy.

The researcher raised the issue of ‘visa shopping’ with the VFS interviewee as well. However, at VFS, every application is regarded as a ‘fresh’ application. Applications are registered in a system, but three to four days after refusal, the system closes the data and the application is gone. This means that VFS does not track how many applications are done by one applicant, and hence, do not keep track of any visa shopping.

In this context, it is interesting to point to the work of the Regional Schengen Cooperation Officer (RSCO) in New Delhi, within the ‘Balancing Security and Mobility’ project.<sup>12</sup> The main objective of the RSCO project is to further improve the efficiency and quality of the visa decision making process of member states, and enhance local visa cooperation and information-sharing between European (Schengen) countries (Grimmius, 2017; Council of the European Union, 2017). Within this project, the RSCO has done research on opportunities for ‘visa harmonization’. Currently, Schengen countries all have different residence permits, visa requirements, different entry laws and transit rules. This makes it very complicated and difficult to cross-check, especially for local staff, whether passenger are travelling on the right visa. **The RSCO aims to advise on opportunities for harmonization of visa procedures among Schengen countries to avoid possible visa shopping.**

As part of his role, the RSCO disseminates Quarterly Reviews (QR) among the European network in Delhi, in which document and visa fraud, as well as human smuggling and trafficking, trends and patterns are collected and analysed. The main trends in migrant smuggling and document fraud, as reported in the QR’s, will be presented throughout the report. Interesting to mention, in the QR of Jan-Mar 2018 it was reported that in 2016 the total number of Schengen visa applications was 793,290 (with a refusal rate of 8.2%). For 2017 it appears that most member states experienced an increase in visa applications. New Delhi usually sees a higher refusal rate than other big cities in India. Also, most forged documents are intercepted at Delhi airport, but the number at Mumbai airport is growing as well.

### *Modus Operandi and Trends*

- *Travel document fraud*

**Visa fraud can be considered the main modus operandi for document fraud and migrant smuggling by air in India.** Most visa fraud seems to be committed with tourist, family, student and trade fair visa’s. As such, Indians wanting to go to Europe, the UK, the US or Canada, might go through travel agencies to fraudulently obtain their visa. In the visa process, the agencies provide forged or fraudulently obtained supporting documents such as: bank statements, employer statements or employment letters, Income Tax Return (ITR) sheets, diploma’s, education certificates, etc. In many of the cases, the visa application file, as presented to the respective embassy, appears complete and carefully organized. For instance, the RSCO reported of an ongoing and well established fraud pattern concerning business visa applications in which applicants provide fake business invitation letters, personal and company bank statements, personal and company income tax return sheets (ITR) (QR Jul-Sep 2018). Increasingly, Bangladeshi, Sri Lankan and Nepalese travellers now also make use of fraudulent visa agencies in India. Agencies might also provide completely fake visas.

Another MO frequently reported in the QR’s are visa applications as part of a sports or cultural group, or film crew. These fraudulent applications are often intercepted based on profiling. In one of the cases the film crew members for example submitted fake professional cards for their visa application,

---

<sup>12</sup> Funded by the Internal Security Fund of the European Union.

had no sufficient income, and no previous visas. Also, when invited for an interview they had no idea about making movies (QR Jan-Mar 2018).

As noted by one of the ALOs, about half of the recommendations for offloading at the airport -in other words, denying a passenger access to board the aircraft- is done based on profiling. When profiling, ALOs look for irregularities. This might for example include checking a passenger's flight tickets, travel routes, travel documents, travel history, but also the traveller's claim of purpose and whether this matches with the documents he or she is providing. ALOs furthermore pay attention to how passengers appear, dress and how much luggage they are carrying. Most of the profiling cases are men aged between 20-25 and concern visa shopping. In those cases, the visa often does not fit the profile.

Another half of the offloads by ALOs are based on incorrect documents and often concern document fraud. In these cases, ALOs might perform document checks at the airport, such as checking the security features in the passport. Depending on the season, 2 to 3, up to 15 passengers might be offloaded during the ALO's shift at Delhi airport. ALOs in New Delhi expect the trend of migrant smuggling by air to continue rising in these next few years.

Jet Airways indicated that they have about 1 to 2 offloads on a daily basis, mostly based on wrong routing, or in other words: the route does not match a passenger's travel intentions or profile. It might also be that the passenger does not hold (the correct) transit visa for the country he is transiting through. In this case, a passenger is offloaded as well.

In addition to the visa fraud cases, both Jet Airways and the Swiss embassy have also encountered fake and interiorly forged Indian passports; for example a fake biodata page or forged travel history and visa pages. The Swiss embassy only recently intercepted a forged Indian passport of which the biodata page was produced with an ink-jet printer of very good quality. A scan is not able to check the resolution of the biodata page. Looking at the effort and investment, workmanship and equipment costs of such forged documents, practitioners believe there is a network involved.

One of the Senior Security Officers from Jet Airways indicated that most document fraud is encountered on flights to Amsterdam, London and Abu Dhabi; most offloads happen on these flights. Fake documents are encountered on average once per month.

- *Child smuggling ('fake' family relation)*

A more recent trend, in the context of India, is the smuggling of children, or in other words: children travelling with a couple claiming to be the child's parents. Often, these children are between the age of 13-17. The 'fake parents' often travel on a tourist visa and for the child they use a fraudulently obtained document such as a passport. To acquire such a passport, a false birth certificate might be used for example. One of the interviewees noted that the couple gets paid (big) money for smuggling the child. This trend was confirmed by the RSCO, and he added that parents pay for their children to be smuggled with another couple, and are then often taken in with extended family in the destination country. As noted by another ILO, minors might also be sent to Germany or France where they then ask for asylum, as these Schengen countries cannot return an unaccompanied minor. After a few years, minors then apply for family-reunification to have their parents travel to Europe. So it is seen as a sort of 'investment' to send their minors to Europe alone.

A more concrete example, in February this year, the EU delegation in Delhi informed on the disruption of an organised crime group involved in human trafficking/smuggling (QR Jan-Mar 2018). As such, around 10 couples were arrested by the local police for forgery and their roles in the network. Around 60 Indian children/young adults were taken to the UK and Canada. There was a

network involved that also prepared fake documents, used to fraudulently obtain visas and passports. In addition, the Times of India reported of 95 children, between the age of 13-17, being smuggled from the Punjab region to France since 2014.<sup>13</sup>

- *Student applications*

In 2017, most member states experienced a significant increase in applications, partly due to a large amount of student visa applications (from RQ Jan-Mar 2018). Many applicants have no travel history, right qualifications or speak English, or have been previously refused by other missions (visa shopping). Student visa applications in 2017 increased especially for the Baltic and Eastern European missions in Delhi, as agencies see new consulates as possible targets. In Delhi, the Slovakian, Latvian, Lithuanian, Portuguese and Slovenian embassies have been targeted as such (from QR mid-Sep-Dec 2017).

- *Sham marriages*

The RSCO also noted of a more recent pattern in 'sham marriages' (QR Jul-Sep 2018). Europol had namely reported on the disruption of an organised crime group that was trying to smuggle Indians and Nepalese into the EU via fake marriages.

## *Routes*

- *Europe as a Transit*

Migrant smuggling routes often use Europe as a transit, on route to North America or intra-Europe. Specific cases reported by the experts concern Schiphol airport as a transit. This might be explained by the fact that Indians do not need a transit visa for the Netherlands. In addition, although travellers carry a Schengen visa for a certain Schengen country does not necessarily mean this is also the passenger's final destination. Many cases have been reported in which passengers misused the Schengen visa. For instance, the RSCO reported that there is an ongoing trend of young men from Punjab and Gujarat region who misused their Dutch Schengen visa to travel to Europe, then to South America and eventually onwards to the US or Canada (QR of Apr-Jun 2018). The UK ILO furthermore reported a trend of Indians travelling to the Schengen area and then to the UK, but noted that they often want to travel onwards to Canada. This trend was confirmed by Jet Airways, which also noted that most forged and fake visas are found on flights to Amsterdam and London, as well as on air routes that use Amsterdam as a transit and then travel onwards to Toronto or London, where in many cases travellers then ask for asylum.

Document fraud is increasingly being detected on route to Baltic States, such as Poland and Czech Republic. As Kiev (Ukraine) and Belgrade (Serbia) now also provide visa on arrival for Indians, document fraud is increasingly being detected on these routes as well. The RSCO indeed indicated a trend of counterfeited Czech passports being bought from agencies. As such, there seems to be a clear connection between modus operandi, visa on arrival and (air) route. This new trend in routing might be explained by the fact that these Eastern European countries are close to the Schengen area border and hence an interesting option for Indians to travel to Europe. As such, one of the interviewees noted that, considering the 'high' number of offloads in Kiev, Belgrade and Baku (Azerbaijan), it is expected that migrants cross the border somewhere into Europe, but that they do not know where yet.

---

<sup>13</sup><https://timesofindia.indiatimes.com/city/mumbai/couple-held-for-making-passports-trafficking/articleshow/64336288.cms>

Another common air route reported is: New Delhi to Amsterdam and then to South-America. Mexico and Ecuador are popular ‘destinations’ for Indians, as they can get a visa on arrival in these countries. From Mexico or Ecuador migrants may then travel onwards to the US, or instead get off in Amsterdam. This air route was confirmed by experts in India, as well as at Schiphol airport.

From the above, we may conclude that there is a clear link between *modus operandi*, visa on arrival and air route. Migrants use countries where they can get visa on arrival as a transit on their route to other destinations such as Europe or North America.

- *Gulf States as a Transit*

The Gulf States are also a popular transit hub for onward travels to Europe as well as to South-America, and then onwards to North America. Abu Dhabi is often used as transit airport, as it offers connecting flight to Europe as well as to the US and Canada, and Indians do not require a visa for transit in the Gulf States. This was confirmed by Jet Airways, who consider the Abu Dhabi flights as ‘risk flights’. They encounter many forged and fake visas on flight to Abu Dhabi.

As such, Indians wanting to go to North America, Europe or the UK might prefer an indirect route through the Gulf States where they do not need visas for. This way they can circumvent the document checks and only have to use a fake or forged document for the last leg of the route. One of the ILOs explained: “if they cannot get the Schengen or UK visa they find a travel route where they do not need a visa for, or can get a visa easily (visa on arrival) and then travel to Europe”. Although Jet Airways indicated they do not see a lot of human trafficking cases on the route to Europe, they have however encountered such cases on the route from Nepal to Dubai with Delhi as a transit.

- *India as a Transit*

New Delhi airport is also used as a transit for connecting flights coming from Kathmandu (Nepal), Bangkok (Thailand), Dhaka (Bangladesh), Kabul (Afghanistan) and Hong Kong. It was indeed indicated by Jet Airways that many “doubtful” passengers are encountered on these flights.

Aside from Delhi airport, Mumbai airport as well as Chennai airport, are also considered to be big transit hubs in India. Chennai airport particularly because of its proximity to Colombo (Sri Lanka). Hence, Sri Lankans may use Chennai as a transit point.

Iranians also increasingly seem to travel through India to get to Europe or the US. An air route that is currently being seen is: Tehran (Iran) to India, then onwards to Kathmandu (Nepal) or Kabul (Afghanistan), and then switch to Europe. In Kathmandu or Kabul they get a visa on arrival and use the opportunity to arrange a fake or forged document such as a passport, visa or residence permit. On the way back, in transit, instead of travelling back they go into the direction of Europe.

### 5.3.2. Main challenges of air border management: needs assessment

#### *Challenges at (Indian) country level*

- *Visa agency culture*

As explained before, the majority of Indians go through a visa or travel agency to arrange their travels. This is part of the culture. The visa agency culture, however, can definitely be considered a challenge, because the irregular visa business is very open for abuse and may enhance migrant smuggling by air through the use of fraudulently obtained documents. Interesting to mention is the fact that less than 10.0% of the visa agencies are actually licensed. This might be explained by the fact that having a

license costs money, but perhaps also because the (irregular) visa business is a big business. In this context, one of the ALOs suggested a database to keep track of visa applicants that have provided fake documents in the visa application process, including information on the agent used. Currently, this is not consistently being reported and in most of the cases, nothing happens.

Also, a harmonized approach with regards to the visa application process would be good for all member states to avoid 'visa shopping' and the fraudulent use of visa procedures of the different Schengen countries. Another ILO similarly suggested more synchronization of visa processes. Better insights in the visa gaps between European visa processes could offer opportunity for harmonization of the Schengen visa procedures, and provide a great solution for the misuse of the Schengen visa and visa shopping. Ultimately, this might decrease the chances of migrant smuggling through the use of fraudulently obtained Schengen visas. The RSCO in New Delhi has done research on this and further dialogue on visa harmonization among EU stakeholders is encouraged (based on his research).

- *Airport challenges*

One of the ILOs explained that, generally, the level of training concerning document knowledge is not very good at Delhi airport. According to him, this is a combination of very rapid staff turnover as well as the expansion of Indian aviation, which has resulted in a lack of resources as well as a lack of training. The staff turnover might be explained by the fact that check-in staff, as well as immediate supervisors, get paid poorly and hence, only tend to stay for a short while and then look for better career opportunities. Therefore, any training beyond the basics requires a lot of time as well as willingness of the Indian airlines to make staff available for the duration of the training. Therefore, handing out equipment to detect document fraud, or provide more specialized training, is very short-lived, as the same time next year 70.0% of the staff might be gone again.

Furthermore, what complicates ALOs work at Delhi airport is the fact that they are not allowed to the Immigration Office and have no access to the transit area. They are only allowed airport access until security line. As a lot of irregular activities related to migrant smuggling and document fraud happen after security line, in transit before boarding, it would make ALOs work more effective if they were allowed more access. Especially since currently, Indian airlines such as Jet Airways, refer each and every doubtful case of migrant smuggling or document fraud to the ALOs. This happens on a daily basis. As such, ALOs are available on a rotational basis and when on duty, try to be available 24/7. In this context, the Security Manager of Jet Airways suggested that a dedicated document fraud detection team organized by the Airport Operator or the Immigration Office would be of great help. Similar as to what European Airports have in place.

The Immigration Offices at all airports in India have e-readers available to scan documents and to check/verify biometric data. However, passenger's information is not checked against international watch lists. According to the Jet Airways' Security Manager, so far, India does not have such watch list. In addition, Indian Immigration Offices do not use an Advance Passenger Information System (APIS). According to the Jet Airways' Security Manager this is only used by Indian airlines to transfer advance data of their passengers to destination countries, and only done as per destination country(s) requirement. Indian airlines furthermore use check-in systems such as Sabre, Amadeus and DCS across the network. Interesting to mention is also that, at the airport, there is one CISF (Central Industrial Security Force) airport security officer at every gate –of every outbound flight going from Delhi airport– that is checking passengers/documents. These officers are the only ones that have a card to (physically) open the gate.

Many Indian airlines outsource their check-in operations to companies at the airport. Jet Airways, however, has their own dedicated security team in place. As such, Jet Airways conducts its own check-in/security procedure that includes a pre-screening before check-in, in which the passenger list is being scanned. They also have certain procedures in place that allows them to cross-check passenger's travel documents, to prevent irregular activities in the transit area. The researcher was able to experience Jet Airways' security procedures at Delhi airport, including check-in and gate formalities before boarding.

In case of document fraud or migrant smuggling, airlines bring the case over to the Immigration Office who then hand it over to the police. The case might also be brought directly over to the police. The police then files the case within 24 hours and the case is taken to court. The Bureau of Immigration (BoI) and the police try to track the agency that has provided the fake/forged documents or visas and stop their business. However, such agencies can simply go into business again and start a new visa agency or travel company after some time, because the Indian government is not monitoring this.

- *Cooperation with Indian Authorities (IA)*

From the interviews it has become clear that Indian Authorities (IA) are concerned with national as well as international labour migration, and committed to tackling human trafficking. However, with regards to combatting migrant smuggling and document fraud, cooperation with the IA has been limited (as noted by several ILOs). The same accounts for cooperation on visa issues. As such, cooperation with ILOs in Delhi has been (practically) absent from the Indian side. The Indian Immigration Office, for example, works very much on their own and most of the ILOs do not have access to Delhi airport. Not even the EU Return Liaison Officer, who is actually repatriating Indian nationals. The German, Austrian, Swiss and UK liaisons do have permission to access the airport to support documentation checks, but only up till immigration. Solely the UK ILO has access to the restricted area after immigration. Hence, most of the ILOs do not work together with the BoI. However, as a lot of the crime happens in the transit area, which ILOs do not have access to, it is hard to get a grip on this. For instance, passengers changing air route irregularly when in transit.

The European Return Liaison Officer's duty in New Delhi is to support return processes, especially forced return, from European Member States to India. He also indicated that cooperation with the Indian Authorities, and the Ministry of External Affairs (MEA) in particular, has been very difficult. Although IA have indicated that they do not tolerate irregular migration and wanted to cooperate, in reality there was little specific help. The Return Liaison Officer had, for example, asked the IA permission to approach the Indian-Punjab police, he was not permitted access.

The researcher also spoke to IOM India's Head of Office (HoO) and although IOM India does work together with the Indian Government, specifically the MEA, until now this has been on a project basis. There is no signed cooperation agreement yet with the Indian Government. And even though border management is one of IOM's 'thematic areas', there are currently no projects that focus on that area. A signed cooperation agreement would however better allow IOM to come up with issues they would like to focus on.



### *Challenges for EU-cooperation*

- *At the airport*

The European ALO missions in New Delhi are funded by the Internal Security Fund (ISF). As this is not an 'official position', they are not allowed to enforce any measures. This means that ALOs can only advise airlines on whether to transport a passenger or not, or give offload recommendations in case of serious suspicion of document fraud and/or migrant smuggling/trafficking. The ALOs work at Delhi airport is coordinated in rotational shifts, so that the flights to Europe are covered for the whole week. As such, there is always an ALO available. As most of the flights to Europe depart/arrive around 3 AM, that is also when ALOs experience most problems. Depending on the season, per duty, ALOs check more or less 10 to 20 suspicious passengers. On duty, ALOs support the airline staff during the check-in process at the airport, on European flights to the Schengen area. This however does not include flights to, for example, the Gulf States, which is also considered a popular transit hub on route to Europe.

Following the above, although the ALOs work in general can be considered a good practice, the fact that they only have an advisory capacity and can only check Schengen area flights does limit their effectiveness in some way.

- *Understaffed embassies*

The RSCO in New Delhi noted that visa sections in India are understaffed, although the number of visa applications is growing. As visa consulates only have about 4 minutes per application file, there is limited time to investigate. To give an idea, the Swiss Embassy, one of the biggest EU visa sections in New Delhi, encounters about 1 to 2 cases of visa/document fraud per month. The interviewee at the Swiss embassy furthermore explained that considering the volume of Indians applying for a Swiss visa, it is not possible for the embassy to process the visa applications themselves. Hence, the Swiss Embassy, and the majority of Schengen country embassies, outsource their visa application procedures to VFS Global. This, however, also means that there are no actual visa interviews at the embassies, which makes it more difficult to detect migrant smuggling or document fraud.

In line with the above, another ILO noted that more document checkers generally would be welcome. Especially since recently, smuggling and document fraud facilitators are targeting smaller Schengen embassies with less or less experienced staff. Therefore, generally more visa deciders for the embassies would be good, also to keep pace with the demand of visa applications. Another interviewee confirmed that, overall, most of the embassy staff have indicated the issue of understaffing. And that especially the bigger embassies, which deal with a lot of visa applications every day and hence are particularly understaffed, are attractive targets for visa shopping, because they experience a pressure to process the visa applications in time.

- *Liaison cooperation*

Although the ALOs in Delhi indicated that they have quite a good exchange of information, for example in the form of a common chat group or informal gatherings, through which they keep each other and other ILOs updated, this is facilitated in a rather informal way. Aside from the Quarterly Reviews by the RSCO, there does not seem to be a clear facilitation of information/knowledge sharing among ILOs in Delhi. One of the ILOs indeed confirmed that although the ILOs have a good network among the embassies, they should be able to work together more. As such, he suggested having a special team, an united taskforce, for example based at the European Delegation in Delhi. This would allow them to share work on a daily basis. Another ALO similarly suggested having an office at the EU council for document advisors from different countries to work together in a common 'workspace'



and support other ALOs on document knowledge and training. He also indicated that it would be beneficial to get together once every half a year with all ALOs in India to share knowledge and experiences. In addition, another ILO also suggested for the heads of European Consular Services to sit together more regularly. Currently, ILOs in India only meet every 2 to 3 months.

It should furthermore be noted that, with regards to the provision of trainings, there is good cooperation between ILOs and (local) airport and airline staff, as well as document checkers and security teams, and local Embassy staff. These trainings mostly focus on knowledge about the EU, the Schengen area, about the laws and regulations, such as transit regulations, the different types of visas, and profiling. The trainings provided to the airport and airline staff in Delhi could however be better synchronized among ILOs. This also accounts for other Indian airports, such as Mumbai airport, which is growing as a smuggling hub as well. In addition, more emphasis should be placed on training airline staff in profiling to detect possible smuggling and trafficking victims. As fake and fraudulent documents and techniques change constantly, training airline staff on document detection is too big of an investment and difficult to keep updated in the long run. Training on profiling, however, trains staff to identify irregular behaviour and help detect possible smuggled migrants and facilitators who potentially carry fake documents.

- *EU cooperation*

Various interviewees directed to better EU cooperation in general. One interviewee indicated that, in his opinion, European countries need to be more cooperative and should carry out a clear political will on migration issues in India. This should be carried out from the EU collectively, not only from the separate Member States. This could possibly be an agenda point for the Delegation of the European Union to

## 6. Conclusions

The main research questions addressed in this report concern the trends and patterns of smuggling and trafficking via air routes, the *modi operandi*, the role of document fraud, the gaps in technical and institutional capacity for air border management in Nigeria, Morocco and India as well as the best practices identified in each of these partner countries.

The study finds that while the use of air routes in smuggling and trafficking is relatively limited, it remains an issue of concern for European and partner countries' law enforcement agencies present at airports. In recent years, Frontex has reported reports there were approximately 5,000 detections of irregular migrants and facilitators at all EU reporting airports. It is important to note that the datasets available had important limitations, which are highlighted in the report. Overall, the airports of Dublin, London, Paris Charles de Gaulle and Rome reported the highest number of detections for the period 2015-2017.

Smuggling by air is often used for one segment of a combined smuggling journey. Facilitators and irregular migrants can use large EU airports as a hub for transit to other destinations or simply as their final destinations. The airport of Istanbul was often pointed as a main hub for smuggling by air for irregular migration from the Middle East or from South Asia, while Athens and smaller Greek airports appeared to be used for intra-EU smuggling by air. Visa-free (transit) regimes seem to be an underlying factor for large international airports to become popular transit hubs. The irregular use of visa regimes is used by migrants and facilitators either as a 'claimed' transit point to other destinations, or as a final destination, for example by requesting asylum upon arrival.

In all cases, smuggling by air is intrinsically connected to document fraud. Both EU and partner country experts presented a variety of document fraud techniques used. Facilitators and irregular migrants use forged, counterfeit or genuine passports and visas. There are currently two prevalent trends in document fraud; the first one concerns the impostor technique or the use of genuine passports and visas whom do not correspond to the document holder; the second one happens 'upstream' and concerns genuine visas fraudulently obtained. This second trend is specifically prevalent in the context of India, in which there is a strong 'visa agency' culture. The role of private companies during the visa process, such as visa agencies and visa processing centres should be acknowledged in this regard. The outsourcing of the visa process to a private company has the potential for corruption and there is tendency for irregular activities, such as providing false documents or submitting fraudulently obtained visa supporting documents. It is furthermore clear that irregular travel and visa agencies are concerned with making money and as such actively recruit customers. Misinformed migrants are likely to fall into the trap of fraudulent businesses. Following, more uniform or harmonized procedures regarding the visa process are integral to prevent irregular activities and diminish the potential for corruption when visa processes are outsourced.

More importantly, the study reveals that smuggling and trafficking by air can be tackled more adequately through enhanced information sharing and police cooperation. This research-action has served to highlight the limitations regarding data collection and data reporting as well as the challenges of communication and information sharing among the relevant stakeholders. Most European police liaison officers do not have smooth communication with local law enforcement agencies and have only very limited access to the airport. There is also potential for improvement concerning information exchange between EU law enforcement agencies. All in all, transnational organized crime networks of smuggling and trafficking can only be tackled through enhanced

communication and coordination among all authorities concerned in origin, transit and destination countries.

## Part 4: Operational and policy recommendations

### Operational recommendations: Addressed partner countries

TABLE 16. CHALLENGES AND RECOMMENDATIONS NIGERIA

Nigeria	
Challenge	Recommendation
1. Limited network connection and electricity power hinder the functioning of border data management systems	Ensure the installation of the necessary infrastructure to host a comprehensive data management system. IOM's baselines assessment at Lagos and Abuja airports revealed infrastructural challenges. High-speed internet cable connection and resilient electricity networks are essential pre-conditions to host a migration information and data analysis system.
2. Lack of computer literacy and specific training on document fraud hinder the capacity of officers to identify fraudulent documents at air borders	Set up long-term training programs for NIS operational-level officers on IT skills and document fraud detection. To ensure the sustainability of this training series, NIS can for instance cooperate with ECID (KMar) on implementing "Training of trainers" (ToT) activities. Such ToT could then be incorporated into the curriculum for the ECOWAS Border Management Training Centre, located in Nigeria. Ensure the trainings are focused on enhancing the ownership of the border data management system.
3. Officers at the control desk do not have the capacity to detect fake or fraudulently obtained Schengen visas	Ensure smooth communication of NIS officers with EU embassies and liaison officers in Nigeria. NIS officers could be able to request to Liaison officers a rapid check against the EU Visa Information System (VIS).
4. Lack of human trafficking specialists hinders the prevention and detection of cases of human trafficking at the airport	Enact an anti-trafficking operational protocol at internal and international airports. Set up anti-human trafficking training programs, transversal to all units of the NIS and National Police. Ensure the presence of one NAPTIP cell or representative at each international airport; NAPTIP agents can carry out training and react immediately to suspicions of human trafficking.
5. Inter-agency rivalry at airports impedes efficient coordination of law-enforcement actors	Encourage dialogue and coordination by setting up monthly meetings with team leaders of each agency in order to draw balance and set common objectives. The Nigerian Ministry of Internal Affairs could head this inter-agency meeting.

TABLE 17. CHALLENGES AND RECOMMENDATIONS MOROCCO

Morocco	
Challenge	Recommendation
1. The lack of digitalized border procedures hampers efficient border data management	Ensure the installation of a digitalized and automatic border data system; each passenger entering or exiting the airport is registered into a national database and checked against international watch list, such as the Migration Information and Data Analysis System (MIDAS) proposed by IOM.
2. API and PNR systems are currently not in place	Ensure the implementation of API and PNR systems in order to improve risk analysis and risk prevention at the airport. Set up trainings across the DGSN and customs airport units on the use of API and PNR data.
3. Lack of smooth information exchange and trust hampers police cooperation on transnational organized crime	Most EU Immigration Liaison Officers and Police Liaison Officers report communication challenges with the DGSN. However, the Spanish National Police has built a solid partnership with the DGSN. There is a need to encourage dialogue and cooperation by, for instance, setting up regular meetings co-headed by the DGSN and the Spanish National Police, which would serve to establish cooperation priorities among EU and Moroccan stakeholders for mutual benefit.

TABLE 18. CHALLENGES AND RECOMMENDATIONS INDIA

India	
Challenge	Recommendation
Visa shopping at European Embassies in New Delhi	Ensure the implementation of a harmonized approach with regards to the visa application process for all EU member states. In that sense, the work of the Regional Schengen Cooperation Office (RSCO) should be taken into account and expanded. Additionally, an EU-ILO system to keep track of visa application attempts would enhance cooperation and efficiency in detecting visa shopping.
Limited cooperation structures between ALOs and EU ILOs present in New Delhi Limited cooperation of EU ILOs with the Bureau of Immigration	Enhanced cooperation and coordination among airline liaison officers and EU immigration liaison officers in New Delhi would increase efficiency in the detection of document fraud and smuggling by air. All liaison officers could work in a more organized, formalized structure; for instance, in the form of a united taskforce, in which document experts, ILOs and ALOs can work together. Additionally, EU stakeholders could encourage more

	regular meetings of all ILOs at the EU delegation. Ultimately, better cooperation between EU ILO's and the Bureau of Immigration at the airport would be beneficial in the fight against document fraud and smuggling at the airport.
<b>Limited airport access for ILO/ALO at New Delhi airport</b>	Currently most of the ILO's in New Delhi have either no access to the airport at all, or only until the immigration check. Improved access to the airport transit area, would benefit ILO's work in combatting document fraud and smuggling by air, as more experts will be available at the airport to support document checks for both European and Indian airlines. Indeed, better ILO/ALO access to the transit area would make ALO's work more effective, since a lot of irregular activities with regards to document fraud and smuggling by air happen in transit.
<b>Dedicated security team at New Delhi airport</b>	Currently, most Indian airlines outsource their check-in operations or carry out their own security procedures, and have to refer doubtful cases to ALO's. Hence, there is no harmonized approach or synchronized security procedures at the gates. A dedicated document fraud detection team, or dedicated security team organized by the airport operator or the Bureau of Immigration would help prevent document fraud and smuggling by air, as well as detect irregularities in the transit area.

## Policy recommendations: Addressed at the European Union and EU Member States border security agencies

1. Making regular migration opportunities more accessible in origin countries is key to prevent migrant smuggling. Indeed, **broadening the opportunities for regular migration and increasing the accessibility of regular travel documents greatly limits the demand for migrant smuggling services**. Additionally, there is evidence that more open migration systems tend to produce circulatory movements, which in turn reduce overstaying (de Haas, 2018). “Mobility and legal migration” is the first and main pillar of the Mobility Partnership and Common Agenda for Migration and Mobility. EU stakeholders shall continue working on the priority in parallel to the fight against irregular migration.
2. **Improving data collection and analysis systems at the EU level is essential in order to get a clearer overview of the volume, modus operandi and trends of smuggling and trafficking by air.** Data on smuggling and trafficking by land, sea and air is extremely scarce. As seen throughout the report, Frontex data remains incomplete or unavailable, which impedes researchers from drawing clear assessments of the situation. On the other hand, **EU stakeholders would benefit from supporting the implementation of digital border data collection and migration information systems in all partner countries.**
3. According to experts, smuggling routes change rapidly while hubs remain relatively stable. **Visa-free (transit) regimes seem to be an underlying factor for large international airports to become popular transit hubs**, and as such, form an integral component of the modus operandi for (irregular) migration. Therefore, **anti-smuggling policies should focus on supporting interventions at a reduced number of airports identified as hubs**. Additionally, bearing in mind that smuggling by air is most often one leg of a longer smuggling journey, **tackling smuggling networks at “land” hubs is equally important in the fight against smuggling by air.**
4. Enhancing police cooperation with partner countries is necessary to better tackle smuggling and trafficking by air. Specific border security interventions in limited locations only result in the displacement of smuggling networks. **Building trust and long lasting cooperation with border security authorities and immigration services in partner countries is crucial to detect and prosecute smuggling networks in origin, transit and destination countries.** In that sense, the EU should continue supporting the work of EMLOs and ILOs and encourage coordination among them as well as with partner countries authorities. EMLOs and ILOs in partner countries are furthermore encouraged to provide trainings for local staff at airports to detect people who potentially carry fake or fraudulent documents. As document fraud techniques change on a continuous basis, it is more sustainable to train staff in identifying people with irregular behaviour who potentially carry fake or fraudulent documents.
5. Encouraging knowledge exchange and the sharing of best practices among EU stakeholders operating at airports is equally important. While cooperation among EU member states’ law enforcement agencies is good, most experts interviewed agree there is room for improvement. EUROPOL is already a good example of a platform to host knowledge-sharing activities on a regular basis.

6. **Promoting the implementation of “Dedicated Gate Controls” at EU Member States’ airports can increase detection of document fraud, facilitators and victims of trafficking.** This best practice of the Koninklijke Marechaussee at Amsterdam Schiphol airport has allowed them to work faster and more efficiently on detections and prosecutions. The gate control conducts risks analysis based on data from API and SIS (Schengen Information System) before intervention on specific flights.
7. Airlines are indispensable allies in the fight against smuggling and trafficking by air. **Continuous training of all airline staff is crucial to enhance the detection of fraudulent documents, smuggled migrants as well as victims of trafficking.** Emphasis should be on training staff on identifying potential facilitators and smuggled migrants at the airport, as well as on detecting irregular activities in the airline system, such as irregular payment activities. Also, while major international airlines are often well prepared and trained in line with the UN Protocol Against the Smuggling of Migrants by Land, Sea and Air, smaller national or regional airlines in partner countries should not be neglected in the fight against smuggling by air.
8. The role of private companies in the visa application and travel process, such as visa agencies and processing centres, has the potential for irregular activities and corruption. More uniform or harmonized procedures regarding the visa process are integral to prevent irregular activities and diminish the potential for corruption when visa processes are outsourced. Like all organized crime activities, smuggling and trafficking of migrants is motivated by a hunt for profits. Therefore, anti-smuggling policies can be more efficient if there are effective mechanisms to track and confiscate the financial proceeds of the crime.

## References

- Abiodun, A. K., George, A., Chukwuma, A. C., Gbenga, O., & Iluno, L. U. (2017). Human Trafficking: A Global Challenge Reflection on the Challenges in Nigeria. *Journal of Law, Policy & Globalization*, 61, 192.
- Advocate Khoj. (1860). Indian Penal Code, 1860. Retrieved March 15, 2018, from [http://www.advocatekhoj.com/library/bareacts/indianpenalcode/index.php?Title=Indian Penal Code%2C 1860](http://www.advocatekhoj.com/library/bareacts/indianpenalcode/index.php?Title=Indian%20Penal%20Code%2C%201860).
- Afolayan, A., Ikwuyatum, G., & Abejide, O. (2009). Dynamics of International Migration in Nigeria. A Review of Literature.
- Alberola, C. & Merkle, O. (Forthcoming) The double price: A gender perspective on corruption encountered during irregular and forced migration in the case of Spain. UNU-MERIT Working Papers.
- Altai Consulting. (2015). Irregular Migration Between West Africa, North Africa and the Mediterranean. Retrieved February 2018 from [http://www.rodakar.iom.int/oimsenegal/sites/default/files/Altai%20Consulting-Free%20Movement%20and%20Migration%20in%20West%20Africa-Final%20Report...\\_0.pdf](http://www.rodakar.iom.int/oimsenegal/sites/default/files/Altai%20Consulting-Free%20Movement%20and%20Migration%20in%20West%20Africa-Final%20Report..._0.pdf)
- Anand, K. (2015, July 23). Air India Ground Staff Arrested for Trafficking Nepalese Women to Dubai. *India Times*. <https://www.indiatimes.com/news/india/air-india-ground-staff-arrested-for-trafficking-nepalese-women-to-dubai-235199.html>
- Anti-Corruption Portal. (2017). Nigeria Corruption Report. Retrieved March 2018 from <https://www.business-anti-corruption.com/country-profiles/Nigeria>
- Anti-Corruption Authorities. (2018). Profiles: Nigeria. Retrieved March 2018 from <https://www.acauthorities.org/country/ng>
- Baba, N. (2011). Le Maroc face a la traite transnationale: interroger les elements de reponse. Series on the fight against trafficking in persons and the smuggling of migrants in legislation. CARIM 2011/43. Robert Schuman Centre for Advanced Studies.
- Bala, A. (2017). Migration in India: Causes and consequences. *International Journal of Advanced Educational Research*, 2(4).
- Bhalla, N. (2017, March 9). Almost 20,000 women and children trafficked in India in 2016. *Thomson Reuters Foundation*. Retrieved January 2017 from <https://www.reuters.com/article/us-india-trafficking/almost-20000-women-and-children-trafficked-in-india-in-2016-idUSKBN16G29G>
- Bhawra, V., K. (2013). Irregular Migration from India to the EU: Evidence from the Punjab. CARIM – India.
- Bhat, A. (2017). India - The Anti-Bribery and Anti-Corruption Review - Edition 6. Retrieved March 19, 2018, from <https://thelawreviews.co.uk/chapter/1151852/india>
- Bureau of Immigration. (2018). About Bureau Of Immigration. Retrieved March 15, 2018, from <https://boi.gov.in/>



- Campana, P. (2015). The structure of human trafficking: Lifting the bonnet on a Nigerian transnational network. *British Journal of Criminology*, 56(1), 68-86.
- Carling, J. (2005). Trafficking in Women from Nigeria to Europe. Migration Policy Institute.
- Carling, J. (2006). Migration, Human Smuggling and Trafficking from Nigeria to Europe. IOM Migration Research Series N.23. IOM.
- Carling, J. (2007). Migration Control and Migrant Fatalities at the Spanish-African Borders. *The International Migration Review*, 41(2), 316–343.
- Carling, J. (2016). West and Central Africa in Migrant Smuggling Data and Research: A global review of the emerging evidence base edited by M.L. McAuliffe and F. Laczko. International Organization for Migration.
- Carrera, S., Cassarino, J.P., El Quadim, N., Lahlou, M., den Hertog, L. (2016). *EU-Morocco Cooperation on Readmission, Borders and Protection: a model to follow?* Centre for European Policy Studies Retrieved from <https://www.ceps.eu/system/files/EU-Morocco%20Cooperation%20Liberty%20and%20Security%20in%20Europe.pdf>
- Central Intelligence Agency (CIA). (2018a). The World Factbook: Morocco. Retrieved from <https://www.cia.gov/library/publications/the-world-factbook/geos/mo.html>
- Central Intelligence Agency (CIA). (2018b). South Asia: India. CIA the World Factbook. Retrieved January 2017 from <https://www.cia.gov/library/publications/the-world-factbook/geos/in.html>
- Central Intelligence Agency (CIA). (2018c). Africa: Nigeria. CIA the World Factbook. Retrieved January 2017 from [https://www.cia.gov/library/publications/the-world-factbook/geos/print\\_ni.html](https://www.cia.gov/library/publications/the-world-factbook/geos/print_ni.html)
- Civilmentor Wordpress. (2014). Posts about The Punjab Prevention of Human Smuggling Act on CIVIL MENTOR. Retrieved March 16, 2018, from <https://civilmentor.wordpress.com/tag/the-punjab-prevention-of-human-smuggling-act/>
- CNDH Conseil National des Droits de l'Homme (n.d.). Avis du Conseil national des droits de l'Homme sur le projet de loi n° 27.14 relatif à la lutte contre la traite des personnes.
- Connor, P. (2017, March 13). India is a migration superpower. Here is why. *World Economic Forum*. Retrieved January 2017 from <https://www.weforum.org/agenda/2017/03/5-facts-that-show-india-is-a-migration-superpower>
- Coslovi, L (2007). Biglietti diversi, Destinazione comune. Indagine sul mercato dell'emigrazione irregolare dal Marocco centrale verso l'Italia e la Spagna. Working Paper 32/2007. Centro Studi di Politica Internazionale CESPI.
- Council of the European Union (2013). Joint declaration establishing a Mobility Partnership between the Kingdom of Morocco and the European Union and its Member States. Brussels, 3 June 2013 (05.06).
- Coyne J., & Nyst, M. (2017). People smugglers globally, 2017. ASPI. Retrieved January 2017 from <https://www.aspi.org.au/report/people-smugglers-globally-2017>

- De Bel Air, F. (2016). Migration Profile: Morocco. Issue 2016/05. Robert Schuman Centre for Advanced Studies.
- de Haas, H. (2005). *Morocco's Migration transition: Trends, determinants and future scenarios*. Global Commission on Internat. Migration. MDR Working Paper n.3.
- de Haas, H. (2006a). Migration, remittances and regional development in Southern Morocco. *Geoforum*, 37(4), 565–580. <https://doi.org/10.1016/j.geoforum.2005.11.007>
- De Haas, H. (2007a). The myth of invasion, Irregular migration from West Africa to the Maghreb and the European Union. International Migration Institute, University of Oxford.
- De Haas, H. (2007b). International Migration, National Development And The Role Of Governments: The Case Of Nigeria. In *International migration and national development in sub-Saharan Africa* (pp. 161-181).
- de Haas, H. (2009). International Migration and Regional Development in Morocco: A Review. *Journal of Ethnic and Migration Studies* 35(10): 1571–1593.
- De Haas, H. (2013 October 5<sup>th</sup>). Smuggling is a reaction to border controls, not the cause of migration. Retrieved March 2018 <http://heindehaas.blogspot.nl/2013/10/smuggling-is-reaction-to-border.html>
- De Haas, H. (2015). Don't blame the smugglers: the real migration industry. Retrieved March 2018 from <http://heindehaas.blogspot.nl/2015/09/dont-blame-smugglers-real-migration.html>
- Den Hertog, L. (2016a). "Funding the EU–Morocco 'Mobility Partnership': Of implementation and competences", *European Journal of Migration and Law*, Vol. 18, No. 3.
- Dominguez, I. & Galvez, J. (2017, April 17). "La gente lloraba al oír el nombre del capo." Retrieved April 15, 2018, from [https://politica.elpais.com/politica/2017/04/17/actualidad/1492445386\\_816568.html](https://politica.elpais.com/politica/2017/04/17/actualidad/1492445386_816568.html)
- Donaldson, M., & Beaty, T. (n.d.). Morocco sets unlikely precedent in hosting sub-Saharan migrants. Retrieved February 20, 2018, from <http://america.aljazeera.com/articles/2015/5/13/morocco-sets-unlikely-precedent-in-hosting-sub-saharan-migrants.html>
- Doshi, V. (2017, February 9). Fingerprint payments prompt privacy fears in India. *The Guardian*. Retrieved January 2017 from <https://www.theguardian.com/sustainable-business/2017/feb/09/fingerprint-payments-privacy-fears-india-banknotes>
- Economic and Financial Crimes Commission (EFCC). (2018a). Nigeria Financial Intelligence Unit (NFIU). Retrieved March 2018 from <https://efccnigeria.org/efcc/nfiu>.
- Economic and Financial Crimes Commission (EFCC). (2018b). The Establishment Act. Retrieved March 2018 from <https://efccnigeria.org/efcc/about-efcc/the-establishment-ac>.
- EEAS. (2017, July 25<sup>th</sup>). Lutte contre la traite des êtres humains: Journée d'étude sur le cadre institutionnel prévu par la loi 27-14 - Commission européenne. (n.d.). Retrieved April 17, 2018, from [https://eeas.europa.eu/delegations/morocco\\_fr/30374/Lutte contre la traite des êtres humains: Journée d'étude sur le cadre institutionnel prévu par la loi 27-14](https://eeas.europa.eu/delegations/morocco_fr/30374/Lutte%20contre%20la%20traite%20des%20%C3%AAtres%20humains%20Journ%C3%A9e%20d%C3%A9tude%20sur%20le%20cadre%20institutionnel%20pr%C3%A9vu%20par%20la%20loi%2027-14)

- Ellis, S., Niapegue, C. P., Imorou, A., Nwanyinnaya, G., V., Restoy, E., Garsany, J. (2011). The role of organized crime in the smuggling of migrants from West Africa to the European Union. UNODC
- Elmadmad, K. (2008). Migration irreguliere et migration ilegale, l'exemple des migrants sub-sahariens au Maroc. CARIM Notes d'analyse et de synthese(2008/49). Robert Schuman Centre for Advanced Studies.
- Elmadmad, K. (2008). Migration irrégulière et migration illégale. L'exemple des migrants subsahariens au Maroc. CARIM Analytic and Synthetic Notes; 2008/49; Irregular Migration Series; Legal Module. Robert Schuman Centre for Advanced Studies.
- Elmadmad, K. (2010). Rapport sur le cadre juridique et institutionnel de la migration au Maroc. Annees 2009 et 2010. CARIM 2010/31. Robert Schuman Centre for Advanced Studies.
- European Parliamentary Research Service (EPRS). (2015) Irregular migration in the EU: Facts and Figures. European Parliament, Brussels. Retrieved from [http://www.europarl.europa.eu/RegData/etudes/BRIE/2015/554202/EPRS\\_BRI\(2015\)554202\\_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/BRIE/2015/554202/EPRS_BRI(2015)554202_EN.pdf)
- European Commission {COM(2016) 267 final} *Report on the progress made in the fight against trafficking in human beings (2016) as required under Article 20 of Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims*. Brussels, 19.5.2016.
- European Political Strategy Centre (EPSC). (2017). Irregular Migration via the Central Mediterranean. Retrieved February 2018 from [https://ec.europa.eu/epsc/publications/strategic-notes/irregularmigration-central-mediterranean\\_en](https://ec.europa.eu/epsc/publications/strategic-notes/irregularmigration-central-mediterranean_en)
- Europol. (2016a). Migrant smuggling in the EU. Europol Public Information.
- Europol. (2016b). Situation Report Trafficking in human beings in the EU. Retrieved February 2018 from [https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/situational\\_report\\_trafficking\\_in\\_human\\_beings\\_europol.pdf](https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/situational_report_trafficking_in_human_beings_europol.pdf)
- Europol. (2017a). First year activity report. *Europol & European Migrant Smuggling Centre*. Retrieved January 2017 from <http://globalinitiative.net/documents/activity-report-first-year-jan-2016-jan-2017/>
- Europol. (2017b, October 13). French and German Police Disrupt Organised Crime Group Smuggling People from India into Europe. Retrieved from <https://www.europol.europa.eu/newsroom/news/french-and-german-police-disrupt-organised-crime-group-smuggling-people-india-europe>
- Europol-INTERPOL. (2016). Migrant smuggling networks, joint Europol-INTERPOL report. Retrieved January 2017 from <https://www.europol.europa.eu/newsroom/news/europol-and-interpol-issue-comprehensive-review-of-migrant-smuggling-networks>
- Favre, C. (2015, September 14). J'ai été passeur entre le Maroc et l'Espagne. *Rue89*. <https://www.rue89strasbourg.com/passeur-entre-maroc-espagne-92004>, accessed February 23, 2018.

- Frontex. (2014). Annual Risk Analysis for 2014. Retrieved February 2017 from [http://frontex.europa.eu/assets/Publications/Risk\\_Analysis/Annual\\_Risk\\_Analysis\\_2014.pdf](http://frontex.europa.eu/assets/Publications/Risk_Analysis/Annual_Risk_Analysis_2014.pdf)
- Frontex. (2016). Risk Analysis for 2016. Retrieved February 2017 from [http://frontex.europa.eu/assets/Publications/Risk\\_Analysis/Annual\\_Risk\\_Analysis\\_2016.pdf](http://frontex.europa.eu/assets/Publications/Risk_Analysis/Annual_Risk_Analysis_2016.pdf)
- Frontex. (2017). Risk Analysis for 2017. Retrieved January 2017 from [frontex.europa.eu/assets/Publications/Risk\\_Analysis/Annual\\_Risk\\_Analysis\\_2017.pdf](http://frontex.europa.eu/assets/Publications/Risk_Analysis/Annual_Risk_Analysis_2017.pdf)
- Frontex. (2017b). Africa-Frontex Intelligence Community Joint Report 2016. Retrieved from [https://frontex.europa.eu/assets/Publications/Risk\\_Analysis/AFIC/AFIC\\_2016.pdf](https://frontex.europa.eu/assets/Publications/Risk_Analysis/AFIC/AFIC_2016.pdf)
- Frontex. (2018). Risk Analysis for 2018. Retrieved from <https://frontex.europa.eu/publications/risk-analysis-for-2018-aJ5nJu>
- General Assembly resolution 55/25 *Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime* (15 November 2000). Available from <http://www.ohchr.org/Documents/ProfessionalInterest/ProtocolonTrafficking.pdf>
- Gilbert, L. D., & Ubani, N. E. (2017). Democracy and National Development in Nigeria: Challenges and Prospects. *International Journal of African and Asian Studies*, 13, 2409-6938.
- Global Slavery Index. (2017). The Global Slavery Index, India. Retrieved January 2017 from [https://www.globalslaveryindex.org/country/india/#footnote-\[13\]](https://www.globalslaveryindex.org/country/india/#footnote-[13])
- Home Department. Government of Uttar Pradesh, India. (2017). Anti Human Trafficking Units in UP. Retrieved October 19, 2018, from <http://uphome.gov.in/anti-human-trafficking.htm>
- Huddleston, W., Karacay, A. B., Nikolova, M. (2015). Study on smuggling of migrants, characteristics, responses and cooperation with third countries. European Commission, DG Migration & Home Affairs, Case Study 4: Nigeria – Turkey – Bulgaria.
- Human Rights Watch. (2018). World Report 2018: Morocco/Western Sahara. Retrieved from <https://www.hrw.org/world-report/2018/country-chapters/morocco/western-sahara>
- International Centre for Migration Policy Development (ICMPD). (2017). Strengthening Moroccan Operational Capacities for the Verification of False Travel Documents. Retrieved from [https://www.icmpd.org/fileadmin/user\\_upload/Action\\_Infonote\\_ES-MA\\_2017-10-04.pdf](https://www.icmpd.org/fileadmin/user_upload/Action_Infonote_ES-MA_2017-10-04.pdf)
- Immigration and Refugee Board of Canada. (2013). Nigeria: False documents available in Nigeria and from Nigeria. Retrieved February 2018 from <http://www.refworld.org/docid/52a82baf4.html>
- Independent Corrupt Practices Commission (ICPC). (2017). Our Role. Retrieved March 2018 from <http://icpc.gov.ng/our-role/>
- Indian Penal Code. (1960). Section 464 in the Indian Penal Code. Retrieved January 2017 from <https://indiankanoon.org/doc/1745798/>
- International Civil Aviation Organization (ICAO). (n.d.). ICAO trip strategy the Nigerian experience. Retrieved March 2018 from [https://www.icao.int/Meetings/mrtd-Nairobi-2015/Documents/11\\_pm\\_7\\_Ogbu.pdf](https://www.icao.int/Meetings/mrtd-Nairobi-2015/Documents/11_pm_7_Ogbu.pdf)

- International Labour Organization (ILO). (2015). Bilateral Agreements and Memoranda of Understanding on Migration of Low Skilled Workers: A Review. Retrieved January 2017 from [http://www.ilo.org/wcmsp5/groups/public/---ed\\_protect/---protrav/---migrant/documents/publication/wcms\\_385582.pdf](http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---migrant/documents/publication/wcms_385582.pdf)
- International Labour Organization (ILO). (2018). EU-India Cooperation and Dialogue on Migration and Mobility. Retrieved January 2017 from [http://www.ilo.org/newdelhi/whatwedo/projects/WCMS\\_572866/lang--en/index.htm](http://www.ilo.org/newdelhi/whatwedo/projects/WCMS_572866/lang--en/index.htm)
- International Organization for Migration (IOM). (2014). Migration in Nigeria: A Country Profile 2014. Retrieved February 2018 from <https://publications.iom.int/books/migration-nigeria-country-profile-2014>
- International Organization for Migration (IOM). (2016a). Glossary on Migration. Retrieved January 2017 from <https://www.iom.int/glossary-migration-2016>
- International Organization for Migration (IOM). (2016b). *Migrant Smuggling Data and Research: A global review of emerging evidence*. Retrieved January 2017 from [https://publications.iom.int/fr/system/files/smuggling\\_report.pdf#page=15](https://publications.iom.int/fr/system/files/smuggling_report.pdf#page=15)
- International Organization for Migration (IOM). (2017). Human trafficking through the central Mediterranean route: Data, stories and information collected by the International Organization for Migration. Retrieved February 2018 from [http://www.italy.iom.int/sites/default/files/news-documents/IOMReport\\_Trafficking.pdf](http://www.italy.iom.int/sites/default/files/news-documents/IOMReport_Trafficking.pdf)
- Inyang, I. (2017 August, 8<sup>th</sup>). Nigerian Immigration bans cash payments at passport offices. Daily Post. Retrieved February 2017 from <http://dailypost.ng/2017/08/28/nigerian-immigration-bans-cash-payments-passport-offices/>
- Irfan, H. (2012, January 20). From India to the U.S. via the jungles of Guatemala: Investigation exposes route taken by human traffickers. *Mail Online India*. Retrieved January 2018 from <http://www.dailymail.co.uk/indiahome/indianews/article-2089652/From-India-U-S-jungles-Guatemala-Investigation-exposes-route-taken-human-traffickers.html#ixzz433bgiXeN>
- Jainl, A. (2011, May 2<sup>nd</sup>). Fingerprint scanner at airport to check illegal migration. The Times of India. Retrieved January 2018 from <https://timesofindia.indiatimes.com/city/ahmedabad/Fingerprint-scanner-at-airport-to-check-illegal-migration/articleshow/8137590.cms>
- Kigbu, S. K., & Hassan, Y. B. (2015). Legal Framework for Combating Human Trafficking in Nigeria: The Journey So Far. *JL Pol'y & Globalization*, 38, 205.
- Koser, K. (2008). Why migrant smuggling pays. *International Migration*, 46(2), 3-26.
- Lahlou, M. (2015) Morocco's Experience of Migration as a Sending, Transit and Receiving Country. Istituto Affari Internazionali (IAI) Working Papers 15 | 30 - September 2015.
- Lautier, C. (coord.) (2009) La traite transnationale des personnes. Etats de lieux et analyse de reponses au Maroc. OIM Maroc & Ministere de la Justice du Royaume du Maroc.
- LAWNN. (2017). Legal protection against Human Trafficking in India. Retrieved March 15, 2018, from <https://lawnn.com/legal-protection-human-trafficking-india/>

- Lawal, T., & Oluwatoyin, A. (2011). National development in Nigeria: Issues, challenges and prospects. *Journal of Public Administration and Policy Research*, 3(9), 237-241.
- Le Monde-AFP (2017, October 20) Au Maroc, un réseau de passeurs démantelé, son responsable sénégalais arrêté. *Le Monde Afrique*. [http://www.lemonde.fr/afrique/article/2017/10/20/au-maroc-un-reseau-de-passeurs-demantele-son-responsable-senegalais-arrete\\_5203908\\_3212.html](http://www.lemonde.fr/afrique/article/2017/10/20/au-maroc-un-reseau-de-passeurs-demantele-son-responsable-senegalais-arrete_5203908_3212.html), accessed February 23, 2018.
- Limam, M., & Del Sarto, R. A. (2015). Periphery Under Pressure: Morocco, Tunisia and the European Union's Mobility Partnership on Migration. *SSRN Electronic Journal*. Retrieved from <https://doi.org/10.2139/ssrn.2686505>
- Malakooti, A. (2015). Migration trends across the Mediterranean: Connecting the dots. Prepared by Altai Consulting for IOM- MENA.
- Maleno Garzon, H (n.d.). De la externalizacion a lo humano: los cuerpos de la trata. Trata de mujeres y menores en Africa Subsahariana. Retrieved from <https://gepibbaleares.files.wordpress.com/2012/11/la-trata-en-el-trc3a1nsito-helena-maleno-1.pdf>
- Maleno Garzon, H. (n.d.). La trata en el transito migratorio : De la externalización a lo humano. Retrieved from <https://gepibbaleares.files.wordpress.com/2012/11/la-trata-en-el-trc3a1nsito-helena-maleno-1.pdf>.
- Malik, R., & Chandra, D. (2018, January 17). Anti-corruption & Bribery in India. Retrieved March 19, 2018, from <https://www.lexology.com/library/detail.aspx?g=17185ebc-cfd3-4f76-a504-edf12b3361a3>
- Marosi, R., & Becker, A. (2011, February 6). Surge of immigrants from India baffles border officials Texas. *Los Angeles Times*. Retrieved January 2017 from <http://articles.latimes.com/2011/feb/06/nation/la-na-border-indians-20110206>
- Martini, M. (2014). Nigeria: Evidence of corruption and the influence of social norms. Retrieved February 2018 from <https://www.u4.no/publications/nigeria-evidence-of-corruption-and-the-influence-of-social-norms/>
- Mberu, B., and Pongou, R. (2010). Nigeria: Multiple Forms of Mobility in Africa's Demographic Giant. Migration Policy Institute. Retrieved February 2018 from <https://www.migrationpolicy.org/article/nigeria-multiple-forms-mobility-africas-demographic-giant>
- Merkle, O., Reinold, J. & Siegel, M. (2017b). A gender perspective on corruption encountered in (forced/irregular) migration. Comissioned by Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ).
- Mghari, M. (2008). L'immigration Subsaharienne au Maroc. CARIM 2008/77. Robert Schuman Centre for Advanced Studies.
- Middle East Monitor. (2017, November 16). 80 Human Trafficking Rings Thwarted in Morocco in 2017. <https://www.middleeastmonitor.com/20171116-80-human-trafficking-rings-thwarted-in-morocco-in-2017/>, accessed April 15, 2018.

- Ministry of External Affairs. (2017). MADAD Consular Services Management System. Retrieved October 19, 2018 from <http://www.madad.gov.in./AppConsular/welcomeLink>
- Ministry of External Affairs. (2016). Human Trafficking. Retrieved March 19, 2018, from <http://www.mea.gov.in/human-trafficking.htm>
- Ministry of External Affairs. (2013). eMigrate. Recruiting Agent Registration Instructions. Retrieved October 19, 2018, from <https://emigrate.gov.in/ext/preAgent.action>
- Ministry of Home Affairs. (2018). Mandate of Anti Trafficking Cell. Retrieved October 19, 2018, from <https://mha.gov.in/mandate-of-anti-trafficking-cell>
- Molenaar, F., and Kamouni-Janssen, F. (2017). Turning the tide, the politics of irregular migration in the Sahel and Libya. *CRU Report*.
- Monzini, P. (2007). Sea-Border Crossings: The Organization of Irregular Migration to Italy. *Mediterranean Politics*, 12(2), 163–184. <https://doi.org/10.1080/13629390701388679>
- MSF. (2013). Violences, Vulnérabilité et Migration : Bloqués aux Portes de l'Europe Un Rapport sur les Migrants Subsahariens en Situation Irrégulière au Maroc. Retrieved from [https://www.msf.fr/sites/www.msf.fr/files/informemarruecos2013\\_fr\\_0.pdf](https://www.msf.fr/sites/www.msf.fr/files/informemarruecos2013_fr_0.pdf)
- Nadeau, B., L. (2018, February 1<sup>st</sup>). Migrants are more profitable than drugs: how the mafia infiltrated Italy's asylum system. *The Guardian*. Retrieved February 2018 from <https://www.theguardian.com/news/2018/feb/01/migrants-more-profitable-than-drugs-how-mafia-infiltrated-italy-asylum-system>
- National Agency For Prohibition Of Trafficking In Persons (NAPTIP). (2017). Welcome To National Agency For Prohibition Of Trafficking In Persons. Retrieved February 2018 from <https://www.naptip.gov.ng/?p=419>
- Naujoks, D. (2009, October 15). Emigration, Immigration, and Diaspora Relations in India. *Migration Policy Institute*. Retrieved January 2017 from <https://www.migrationpolicy.org/article/emigration-immigration-and-diaspora-relations-india>
- Nwaokugha, D. O., & Ezeugwu, M. C. (2017). Corruption in the education industry in Nigeria: Implications for national development. *European Journal of Training and Development Studies*, 4(1), 1-17.
- Ocheje, P. D. (2017). Norms, law and social change: Nigeria's anti-corruption struggle, 1999–2017. *Crime, Law and Social Change*, 1-19.
- Ogundipe, B., O., & Exediaro, C. (2017). Anti-Corruption Regulation Nigeria. Retrieved February 2018 from <https://gettingthedealthrough.com/area/2/jurisdiction/18/anti-corruption-regulation-nigeria/>
- Okojie, O., Eghafona, K., Vincent-Osaghae, G., and Kalu, V. (2003). Report of field survey in Edo State, Nigeria. United Nations Interregional Crime and Justice Research Institute (UNICRI), Programme of action against trafficking in minors and young women from Nigeria into Italy for the purpose of sexual exploitation, Torino.

- Orozco, M. (2010). Worker Remittances in an International Scope. Inter-American Development Bank.
- Oxford Poverty & Human Development Initiative (OPHI). (2017). MPI Country Briefings 2018. *Oxford Department of International Development Queen Elizabeth House, University of Oxford*. Retrieved January 2017 from [http://www.dataforall.org/dashboard/ophi/index.php/mp/country\\_briefings](http://www.dataforall.org/dashboard/ophi/index.php/mp/country_briefings)
- Perchstone and Graeys. (n.d.). The Perspective of Corruption. Retrieved March 2017 from [http://www.perchstoneandgraeys.com/assets/ckfinder/userfiles/files/The\\_Perspective\\_of\\_Corruption.pdf](http://www.perchstoneandgraeys.com/assets/ckfinder/userfiles/files/The_Perspective_of_Corruption.pdf)
- Pitkänen, P., & Korpela, M. (2014). Characteristics of Temporary Transnational Migration, Collected Working Papers from the EURA-NET Project. University of Tampere, Finland.
- Prasad, S. (n.d.). Legal Framework for Trafficking in India. Retrieved March 14, 2018, from <https://www.scribd.com/document/95466184/Legal-Framework-for-Trafficking-in-India>
- Pring, C. (2016). People and Corruption: Middle-East and North Africa Survey 2016. Global Corruption Barometer. Transparency International. Retrieved from [https://www.transparency.org/whatwedo/publication/people\\_and\\_corruption\\_mena\\_survey\\_2016](https://www.transparency.org/whatwedo/publication/people_and_corruption_mena_survey_2016)
- Prina, F. (2003). Trade and exploitation of minors and young Nigerian women for prostitution in Italy. United Nations Interregional Crime and Justice Research Institute (UNICRI), Programme of action against trafficking in minors and young women from Nigeria into Italy for the purpose of sexual exploitation., Torino.
- PRS. (n.d.). Corruption laws in India. Retrieved March 15, 2018, from <http://www.prindia.org/>
- Ray, S. (2017, December 30). Indian human traffickers 'used fake rugby tour to smuggle boys to France'. The Telegraph. Retrieved January 2017 from <http://www.telegraph.co.uk/news/2017/12/30/indian-human-traffickers-used-fake-rugby-tour-smuggle-boys-france/>
- Reitano, T (2015). A Perilous but Profitable Crossing: The Changing Nature of Migrant Smuggling through Sub-Saharan Africa to Europe and EU Migration Policy (2012-2015). The European Review of Organised Crime 2(1), 2015, 1-23.
- Riley, P., & Roy, R. K. (2016). Corruption and Anticorruption: The Case of India. Journal of Developing Societies, 32(1), 73-99. doi:10.1177/0169796x15609755.
- Sagar, A., & Kachwaha, S. (2013). Practical Law. Retrieved March 20, 2018, from [https://uk.practicallaw.thomsonreuters.com/3-520-5575?transitionType=Default&contextData=\(sc.Default\)&firstPage=true&bhcp=1](https://uk.practicallaw.thomsonreuters.com/3-520-5575?transitionType=Default&contextData=(sc.Default)&firstPage=true&bhcp=1)
- Saha, K., C. (2009). Smuggling of Migrants from India to Europe and in particular to UK: A Study on Punjab & Haryana. UNODC Institute of Social Sciences. Retrieved January 2017 from [http://www.unodc.org/documents/human-trafficking/Smuggling\\_of\\_Migrants\\_from\\_India\\_to\\_Europe\\_-\\_Punjab\\_Haryana.pdf](http://www.unodc.org/documents/human-trafficking/Smuggling_of_Migrants_from_India_to_Europe_-_Punjab_Haryana.pdf)
- Saha, K., C. (2012). Irregular migration from India to the EU: Punjab & Haryana Case Study. CARIM – India. Retrieved from <http://www.india-eu-migration.eu/media/CARIM-India-2012-28.pdf>



- Scalabrini Institute for Human Mobility in Africa (SIHMA). (2014). Migration Profile: Nigeria. Retrieved February 2018 from [http://sihma.org.za/wp-content/uploads/2016/06/Migration-Profile\\_Nigeria.pdf](http://sihma.org.za/wp-content/uploads/2016/06/Migration-Profile_Nigeria.pdf)
- Schapendonk, J. (2012). Migrants' Im/Mobilities on Their Way to the EU: Lost in Transit? *Tijdschrift Voor Economische En Sociale Geografie*, 103(5), 577–583. <https://doi.org/10.1111/j.1467-9663.2012.00735>
- Schloenhardt, A., & Macdonald, H. (2017). Barriers to Ratification of the United Nations Protocol Against the Smuggling of Migrants. *Asian Journal of International Law*, 7(1), 13–38. <https://doi.org/10.1017/S2044251315000211>
- Smits, K. (2001). Les filles de Benin City. Etude relative au réseau de la prostitution nigériane. Direction Générale Office des Etrangers, Bruxelles.
- Seeberg, P. (2014) Mobility Partnerships and the EU, Part II: The Cases of Libya, Morocco and Tunisia. News Analysis. Centre for Contemporary Middle East Studies, Syddansk Universitet.
- Singh, D. (2017, April 24). Parents in Punjab willingly trafficking kids to Europe due to drug menace, reveals Mumbai police. India Today. Retrieved January 2017 from <https://www.indiatoday.in/india/story/child-trafficking-punjab-drugs-menace-france-mumbai-police-973332-2017-04-24>
- Sinhal, S. (2016, December 17). Aviation ministry likely to introduce biometric screening at airports. *Times of India*. Retrieved January 2017 from <https://timesofindia.indiatimes.com/india/soon-your-thumb-could-be-your-ticket-to-fly/articleshow/56028691.cms>
- Spaajibade. (2013). Executive summary of anti-corrupt legislations with a view to advising foreign investors in Nigeria on anti-corruption programmes. Retrieved March 2018 from <http://www.spaajibade.com/resources/executive-summary-of-anti-corrupt-legislations-with-a-view-to-advising-foreign-investors-in-nigeria-on-anti-corruption-programmes/>
- Srivastava, R. (2017, July 4). Traffickers find new ways to smuggle girls from India's remote northeast. Thompson Reuters Foundation. Retrieved January 2017 from <https://www.reuters.com/article/us-india-trafficking-jobs/traffickers-find-new-ways-to-smuggle-girls-from-indias-remote-northeast-idUSKBN19P1JR>
- Statista. (2018). Illegal immigration facilitators detected in the European Union in 2017, by country of origin. Retrieved from <https://www.statista.com/statistics/454939/number-of-immigration-facilitators-to-the-eu-by-nationality/>
- The Hindu. (2011, April 21). India Biannual Fraud Update. The Hindu. Retrieved from <http://www.thehindu.com/news/the-india-cables/the-cables/229319-India-Biannual-Fraud-Update/article14690495.ece>
- Thomas, S. (2011). Responses to HUMAN TRAFFICKING in Bangladesh, India, Nepal and Sri Lanka. 1-76. Retrieved from <https://unov.tind.io/record/41697?ln=en>
- Tondo, L. (2016, June 11<sup>th</sup>). Mafia at a crossroads as Nigerian gangsters hit Sicily's shores. Retrieved February 2018 from <https://www.theguardian.com/global-development/2016/jun/11/mafia-palermo-nigerian-gangsters-hit-sicily-shores>

Transparency International India. (2005). India corruption study 2005. New Delhi: Centre for Media Studies.

Transparency International (TI). (2017). INDIA. Retrieved January 2017 from <https://www.transparency.org/country/IND>

Transparency International (TI). (2018). NIGERIA. Retrieved January 2017 from <https://www.transparency.org/country/NGA>

United Nations Department of Economic and Social Affairs (UN DESA). (2015a). International migration flows to and from selected countries: The 2015 revision. UNDESA International Migration. Retrieved January 2017 from <http://www.un.org/en/development/desa/population/migration/data/empirical2/migrationflows.shtml>

United Nations Department of Economic and Social Affairs (UN DESA). (2017). World Population Prospects: The 2017 revision. Retrieved January 2017 from <http://esa.un.org/unpd/wpp/Download/Standard/Population/>

United Nations Development Program (UNDP). (2016a). India. *UNDP Human Development Reports*. Retrieved January 2017 from <http://hdr.undp.org/en/countries/profiles/IND>

United Nations Development Program (UNDP). (2016b). Human Development Report 2016: Morocco. Retrieved from [http://hdr.undp.org/sites/all/themes/hdr\\_theme/country-notes/MAR.pdf](http://hdr.undp.org/sites/all/themes/hdr_theme/country-notes/MAR.pdf)

United Nations Development Program (UNDP). (2016c). Nigeria. *UNDP Human Development Reports*. Retrieved January 2017 from <http://hdr.undp.org/en/countries/profiles/NGA>

United Nations High Commissioner for Refugees (UNHCR). (2013). Social, Humanitarian and Cultural Questions. Yearbook of the United Nations 1948- 1949. Retrieved from [https://web.archive.org/web/20130927221000/http://unyearbook.un.org/1948-49YUN/1948-49\\_P1\\_CH5.pdf](https://web.archive.org/web/20130927221000/http://unyearbook.un.org/1948-49YUN/1948-49_P1_CH5.pdf)

United Nations High Commissioner for Refugees (UNHCR). (2017a). Regional Protection Strategic Framework Responding to the Protection Crisis in the Lake Chad Basin. Retrieved February 2018 from [http://reliefweb.int/sites/reliefweb.int/files/resources/lcb\\_protection\\_strategy.pdf](http://reliefweb.int/sites/reliefweb.int/files/resources/lcb_protection_strategy.pdf)

United Nations High Commissioner for Refugees (UNHCR). (2017b). Refugees & Migrants Arrivals to Europe in 2017. Retrieved February 2018 from <https://data2.unhcr.org/en/documents/download/62023>

United Nations High Commissioner for Refugees (UNHCR). (2017c). Nigeria Situation UNHCR Regional Update 01 – 30 June 2017. Retrieved February 2018, from <http://reliefweb.int/sites/reliefweb.int/files/resources/58387.pdf>

United Nations Office for the Coordination of Humanitarian Affairs (UNOCHA). (2018). OCHA Nigeria about the crisis. Retrieved February 2018, from <http://www.unocha.org/nigeria/about-ocha-nigeria/about-crisis#>

- United Nations Office on Drugs and Crime (UNODC). (2003). United Nations Convention against Transnational Organized Crime and the Protocols Thereto. Retrieved January 2017 from <https://www.unodc.org/unodc/en/organized-crime/intro/UNTOC.html>
- United Nations Office on Drugs and Crime (UNODC). (2010). Migrant smuggling by Air. Retrieved January 2017 from [https://www.unodc.org/documents/human-trafficking/Migrant-Smuggling/Issue-Papers/Issue\\_Paper\\_-\\_Migrant\\_Smuggling\\_by\\_Air.pdf](https://www.unodc.org/documents/human-trafficking/Migrant-Smuggling/Issue-Papers/Issue_Paper_-_Migrant_Smuggling_by_Air.pdf)
- United Nations Office on Drugs and Crime (UNODC) (2011a). The role of organized crime in the smuggling of migrants from West Africa to the European Union.
- United Nations Office on Drugs and Crime (UNODC) (2011b). Smuggling of Migrants A Global Review and Annotated Bibliography of Recent Publications.
- United Nations Office on Drugs and Crime (UNODC). (2013a). Current Status of Victim Service Providers and Criminal Justice Actors in India on Anti Human Trafficking. Retrieved January 2017 from <http://globalinitiative.net/wp-content/uploads/2017/01/unodc-assessment-of-human-trafficking-responses-in-india.pdf>
- United Nations Office on Drugs and Crime (UNODC). (2013b). Corruption and the smuggling of Migrants. Issue Paper.
- United Nations Office on Drugs and Crime (UNODC). (2015). Migrant smuggling in Asia. Retrieved January 2017 from <http://globalinitiative.net/documents/migrant-smuggling-in-asia-current-trends-and-related-challenges/>
- United Nations Office on Drugs and Crime (UNODC). (2016). Global Report on Trafficking in Persons 2016 (United Nations publication, Sales No. E.16.IV.6).
- United Nations Office on Drugs and Crime (UNODC). (2017). Corruption in Nigeria, Bribery: public experience and response. Retrieved January 2018 from [https://www.unodc.org/documents/data-and-analysis/Crime-statistics/Nigeria/Corruption\\_Nigeria\\_2017\\_07\\_31\\_web.pdf](https://www.unodc.org/documents/data-and-analysis/Crime-statistics/Nigeria/Corruption_Nigeria_2017_07_31_web.pdf)
- United Nations Office on Drugs and Crime (UNODC). (2018a). Migrant smuggling. Retrieved January 2017 from [https://www.unodc.org/unodc/en/human-trafficking/smuggling-of-migrants.html#What\\_is\\_Migrant\\_Smuggling](https://www.unodc.org/unodc/en/human-trafficking/smuggling-of-migrants.html#What_is_Migrant_Smuggling)
- United Nations Office on Drugs and Crime (UNODC). (2018b). Human Trafficking. Retrieved January 2017 from <https://www.unodc.org/unodc/en/human-trafficking/what-is-human-trafficking.html>
- United Nations Office on Drugs and Crime (UNODC). (2018c). Signatories to the United Nations Convention against Transnational Crime and its Protocols. Retrieved January 2018 from <https://www.unodc.org/unodc/en/treaties/CTOC/signatures.html>
- United Nations Office on Drugs and Crime (UNODC). (2018d). United Nations Office on Drugs and Crime. Retrieved March 16, 2018, from <http://www.unodc.org/southasia/en/topics/frontpage/2009/smuggling-of-migrants.html>
- United Nations Office on Drugs and Crime (UNODC). (2018e). India: Government ratifies two UN Conventions related to transnational organized crime and corruption. Retrieved March 16,

- 2018, from <https://www.unodc.org/southasia/en/frontpage/2011/may/indian-govt-ratifies-two-un-conventions.html>
- United Nations Office on Drugs and Crime (UNODC). (2017f). Global Report on Trafficking in Persons 2016. Global Report on Trafficking in Persons. doi:10.18356/6b57c9bb-en
- UN WOMEN. (2015). La traite des femmes et des enfants au Maroc. Ministère de la Justice et des Libertés au Maroc, Confédération Suisse.
- United State Department of State. (2017a). Trafficking in Persons Report 2017. Retrieved January 2017 from <https://www.state.gov/j/tip/rls/tiprpt/2017/index.htm>
- United States Department of State (2017b) Trafficking in persons report 2017. Tier 2: Morocco. Retrieved from <https://www.state.gov/j/tip/rls/tiprpt/countries/2017/271247.htm>
- United States, Department of State. (2017c). 2017 Trafficking in Persons Report - Nigeria. Retrieved February 2018 from <https://www.state.gov/j/tip/rls/tiprpt/countries/2017/271255.htm>
- Uppsala Conflict Data Program (UCDP). (2018). India. Retrieved January 2017 from <http://ucdp.uu.se/#country/750>
- Waterfield, B. (2008, October 19). Belgium breaks large-scale people trafficking ring targeting UK. Retrieved January 2017 from <http://www.telegraph.co.uk/news/3226626/Belgium-breaks-large-scale-people-trafficking-ring-targeting-UK.html>
- Wittenberg, L. (2017). Managing Mixed Migration: The Central Mediterranean Route to Europe. *International Peace Institute*, desperate migration series, 3.
- World Bank. (2016). *Ending Open Defecation and Achieving a Clean and Healthy Rural India*. Retrieved January 2017 from <http://www.worldbank.org/en/news/feature/2015/12/15/ending-open-defecation-achieving-clean-and-healthy-rural-india>
- World Bank. (2017a). *Sanitation*. Retrieved January 2017 from <http://www.worldbank.org/en/topic/sanitation>
- World Bank. (2017b). *World Bank Open Data*. Retrieved January 2017 from <https://data.worldbank.org/>
- World Bank. (2018). *World Bank Open Data*. Retrieved January 2017 from <https://data.worldbank.org/>

## Annex 1. Interview guides

---

Study on migrant smuggling by air and document fraud

### Interview Guide for Representatives KMar or other European Airports

Interview Identification	
Interview ID number (Interviewer Initials, #)	
Name	
Institution	
Unit	
Position	
Time in Position	
Previous position, if less than one year	
Interviewer	
Date conducted	
Location of Interview	
Language of Interview	

#### Preamble

I would first like to thank you very much for participating today. This interview is part of an action which looks at the main features, developments and modus operandi of migrant smuggling at airports, in addition to the topic's interconnections to document fraud and related poly-criminal activities. The selected partner countries for this project are India, Nigeria, and Morocco as source countries and the Netherlands (and the EU more broadly) as destination country. This study will be conducted largely through qualitative, in-depth interviews with government officials, Ministry of Defense personnel, airport staff, border police, international organizations, private companies (airlines), and civil society organizations. Through this research, we hope to gain a thorough and comprehensive understanding of the understudied phenomena of the smuggling of migrants at airports and the use of fraudulent documents, as well as how these concepts are interconnected in practice. Please note that all interviews will be anonymized and your name will not be used. For accuracy, is it alright with you if I record this interview?

## Intro

1. » Please can you introduce yourself.
  - a. » Prompt: Can you tell me about your duties in your current job?

## Migrants smuggling by air

2. » **What's the scale of migrant smuggling by air to the Netherlands?**
3. » From your perspective, how has it changed over the last decade?
4. » What are the main air routes utilized to smuggle migrants into the Netherlands/Europe from the selected partner countries?
  - a. » Are there significant flows from India, Morocco or Nigeria?
5. » What are the main countries of origin for smuggling by air to the Netherlands?
  - » What are the main countries of transit – connection flights?
    - » Of migrants?
    - » Of smugglers?
6. » **How will smuggling by air change in the future?**
  - a. » **Why? Which are the main factors influencing this trend?**
7. » What are the modus operandi of networks involved in migrant smuggling by air from the partner countries to Europe? How is the activity of smuggling by air related to document fraud?
  - a. » Has the modus operandi changed over the last decade?
8. » How are smuggling organizations/networks set-up? How do they organize themselves; e.g. loose network, criminal organization, and individuals operating?
  - a. » Is it only one network operating from the origin country to Europe or multiple networks operating in different steps of the smuggling process [transit countries]?
9. » What are the fees related to migrant smuggling by air from the selected partner countries to Europe?
  - a. » Which factors influence different fees?
  - b. » Have fees changed over time?
10. » Are migrant smugglers involved in other kind of criminal activities [poly-criminality]? Examples?
11. » **How do you combat migrant smuggling by air at Schiphol? Can you share some examples of best practices in combating migrant smuggling at airports?**
  - a. » What are the main challenges you face and how can they be tackled?
  - b. » What is the role of technology?
  - c. » Do you also assist victims of human trafficking?

### Migrant trafficking networks

12. » What's the scale of human trafficking by air to the Netherlands?
  - a. » How do trafficking networks differ from smuggling networks and how do they overlap?
13. » Are human traffickers involved in other kind of criminal activities?

### Scale of document fraud in selected partner countries

14. » What do you think is the scale of document fraud within the context of smuggling by air from the selected partner countries to Europe?
15. What types of fraudulent documents do you come across?
  - a. » Do you more often encounter look-a-like passport or forged documents?
  - b. » How are forged and/or look-a-like passports and Schengen visas fraudulently produced or obtained?
  - c. » What is the average quality of the documents?
  - d. » Do you find big differences between the different fraudulent documents you encounter?
  - e. » What are the fees related to document fraud (from the selected partner countries)?
16. » There are various modus operandi to enter Europe irregularly at air borders. What is the most common? Can you think of any other method that is being used? (Irregular entry can be done with the look-a-like method, completely forged document, fraudulent document, real document fraudulently obtained, boarding pass swapping.)
17. » How has the use of fraudulent documents at air borders in Europe, and Schiphol in particular, changed over the last decades?
  - a. » Why? Which are the main factors influencing this trend?
  - b. » How do you think it will evolve in the future?
18. » How are document fraud networks set-up and what do they look like (in the selected partner countries)?
  - a. » How do they organize themselves;
    - i. » Are they a loose network, criminal organization, or individuals operating?
    - ii. » How do they use corruption?
      - » Do they work together with entrusted authorities (through corruption)?
19. » Are document fraud networks in the selected countries involved in other serious criminal activities? Examples?
20. » **How do you combat document fraud at Schiphol? Can you give some examples of best practices in combating document fraud at airports?**

- a. » How does the process/procedure work when detecting a case of document fraud in smuggling and/or trafficking?
- b. » **What needs to be done to combat document fraud at airports?**
- c. » What is the role of technology?
  - i. » Has the introduction of biometric passports enhanced the detection and prevention of document fraud?

### Closing

- 21. » Those were all of my questions. Is there anything else that we didn't talk about that you would like to add?
- 22. » Do you have any questions for me?

### Wrap-up

From this point, interviews with a variety of stakeholders will continue both in Brussels and in the selected partner countries, concluding around June 2018. A final evaluation report is expected by October, 2018. I'd like to thank you again for participating.



## AKT Study on migrant smuggling by air and document fraud

### Interview Guide for Partner Countries Stakeholders

Interview Identification	
Interview ID number (Interviewer Initials, #)	
Name	
Institution	
Unit	
Position	
Time in Position	
Previous position, if less than one year	
Interviewer	
Date conducted	
Location of Interview	
Language of Interview	

#### Preamble

I would first like to thank you very much for participating today. This interview is part of an action which looks at the main features, developments and structures of migrant smuggling at airports, in addition to the topic's interconnections to document fraud and related poly-criminal activities. The selected partner countries for this project are India, Nigeria, and Morocco as source and transit countries and the Netherlands (and the EU more broadly) as destination country. This study will be conducted largely through qualitative, in-depth interviews with government officials, Ministry of Defense personnel, airport staff, border police, international organizations, private companies (airlines), and civil society organizations. Through this research, we hope to gain a thorough and comprehensive understanding of the understudied phenomena of the smuggling of migrants at airports and the use of fraudulent documents, as well as how these concepts are interconnected in practice. Please note that all interviews will be anonymized and your name will not be used. For accuracy, is it ok with you if I record this interview?

***Note to Interviewer: Turn on recorder and say the date, location and the Interview ID Number***

## Intro

1. » Please can you introduce yourself.
  - a. Prompt: Can you tell me about your duties in your current job?
  - b. Can you tell me about the projects your organization has carried in regards to border management, police reform (trainings) etc.?

## Migrant smuggling by air and smuggling networks

2. » What is the scale of migrant smuggling by air in [partner country], either as a departure or transit hub, for migrants?
  - a. Is [partner country city] airport known as a hub for human smuggling and trafficking?
3. » From your perspective, how has migrant smuggling by air from and through [partner country] to Europe changed over the last decades? » How will smuggling by air change in the future?
4. » What are the main factors influencing the scale of migrant smuggling by air from [partner country] to Europe?
5. » What are the main air routes utilized to smuggle migrants into Europe from [name of partner country]?
  - a. Do these routes change on a regular basis?
  - b. Do air routes directly connect [partner country] and Europe or are they used in combination with other smuggling methods or transits? Do you have any example?
6. » What are the **modus operandi of networks involved in migrant smuggling by air** from the partner countries to Europe?
  - a. How is the activity of smuggling by air related to document fraud?
  - b. Has the modus operandi changed over the last decade?
7. » How are smuggling organizations/networks set-up? How do they organize themselves; e.g. loose network, criminal organization, and individuals operating?
  - a. » Is it only one network operating from the origin country to Europe or multiple networks operating in different steps of the smuggling process [transit countries]?
8. What are the fees related to migrant smuggling by air from the selected partner countries to Europe?
  - a. Which factors influence different fees?
  - b. Have fees changed over time?

9. Are migrant smugglers involved in other kind of criminal activities [poly-criminality]?  
Examples?
10. How do you combat migrant smuggling by air at [partner country city] airport? Can you share some examples of best practices in combating migrant smuggling at airports?
- a. » What are the main challenges you face and how can they be tackled?
  - b. » What is the role of technology?

#### Migrant trafficking networks

11. » How do trafficking networks differ from smuggling networks and how do they overlap?
12. » How does the organization of trafficking networks differ from the organization of migrant smuggling networks and how do they overlap?
- a. In the use of corruption?
  - b. In the use of fraudulent document?
13. » Are human traffickers involved in other kind of serious criminal activities?  
Examples?

#### Scale of document fraud in selected partner countries

14. » What do you think is **the scale of document fraud within the context of smuggling by air** from the selected partner countries to Europe?
- a. What **types** of fraudulent documents do you come across?
  - b. Do you more often encounter look-a-like passport or forged documents?
  - c. Which **nationalities** are more commonly encountered on fraudulent documents?
  - d. Which are the nationalities of the suspects?
15. » How are forged and/or look-a-like passports and Schengen visas fraudulently produced or obtained?
- a. What is the average quality of the documents?
16. » What are the fees related to document fraud (from the selected partner countries)?
17. » There are various modus operandi to enter Europe irregularly at air borders.  
Which is the most common? (Irregular entry can be done with the look-a-like method, completely forged document, fraudulent document, real document fraudulently

obtained, boarding pass swapping.)

18. » How has the use of fraudulent documents at air borders in Europe, and Schiphol in particular, changed over the last decades?
  - a. » Why? Which are the main factors influencing this trend?
  - b. » How do you think it will evolve in the future?
19. » How are document fraud networks set-up and what do they look like (in the selected partner countries)?
  - a. » How do they organize themselves;
  - b. » Are they a loose network, criminal organization, or individuals operating?
  - c. » How do they use corruption and work together with entrusted authorities (through corruption)?
20. » Are document fraud networks in the selected countries involved in other serious criminal activities?
21. » **How do you combat document fraud at [partner country city] airport? Can you give some examples of best practices in combating document fraud at airports?**
  - a. » How does the process/procedure work when detecting a case of document fraud in smuggling and/or trafficking?
  - b. » What needs to be done to combat document fraud at airports?
  - c. » What is the role of technology?
  - d. » Has the introduction of biometric passports enhanced the detection and prevention of document fraud?

### Closing

22. » Those are all of my questions. Is there anything else that we didn't talk about that you would like to add?
23. » Do you have any questions for me?

### Wrap-up

From this point, interviews with a variety of stakeholders from each of the partner countries will continue both in Europe and in the selected partner countries, concluding around June 2018. I'd like to thank you again for participating.

## Annex 2. List of organizations and stakeholders interviewed

### EU Practitioners

Name	Organization	Position	Email
Niels Dolstra	COA: Central Agency for the Reception of Asylum Seekers	Coordinator	NG.Dolstra@mindef.nl
John Groenendijk	Expertisecentrum Mensenhandel en Mensensmokkel	Coordinator	john.groenendijk@politie.nl
Lisanne Witlam	Cyber security and document fraud office	Cyber security specialist	L.Witlam@mindef.nl
Rene Hartland	KMar - ECID	Expertise Identity Fraud and Documents Preparing criminal investigations (BOV)	r.hartland@mindef.nl
Tom Titerloblobey	Schiphol / Brigade Grensbewaking	Operational officer	
Joost Kroon	Schiphol / Brigade Grensbewaking	Operational officer	
Arthur Deumer	Schiphol / Brigade Grensbewaking	Head	AM.Deumer@mindef.nl
Karte Kaas	FSD	Officer at FSD and forgery expert	-
Henk Kooij	KMar - ECID	Senior Analyst - Data Focal Point	H.Kooij@mindef.nl
Dave Slolboom	KMar - ECID	Trainer ECID	-
Leon Van Vuuren	KMar - ECID	Operational officer	-
Marteen Bloom	KMar - ECID	Operational officer	-
Marco Van Vuuren	KMK	Detective at KMK Anti-Human Smuggling/trafficking team	-
Twan Mooij	KMK	2nd team leader at KMK Anti-Human Smuggling/trafficking team	-
Marjon Uisser	Asylum seekers centre Ter Apel IND		-
Aryan Prenger	Asylum seekers centre Ter Apel IND		-
Sander Kalluij	Asylum seekers centre Ter Apel IND		-
Pieter Prins	FRONTEX	Senior Officer	pieter.prins@frontex.europa.eu
Marcellino Ramkishun	IOM African Capacity Building Center (ACBC)	Senior Migration Management Specialist	mramkishun@iom.int
Radoslaw Malinowski	HAART Kenya	Director of HAART Kenya	rm@haartkenya.org
Luigi Achilli	Migration Policy	Researcher	mramkishun@iom.int

Panagiotis Papadimitriou	Centre		nt panagiotis.papadimitriou@unodc.org)
Gabriella Sanchez	UNODC Migration Policy Centre	Senior Officer	gabriella.sanchez@eui.eu
Nassim Majidi	Samuel Hall	Researcher	nassim.majidi@samuelhall.org
David J. Danelo	Global Initiative	Director	david.danelo@gmail.com
Jacob Townsend	Seefar/Farsight	Senior Fellow CEO Seefar	jacob@seefar.org

## NIGERIA

Name	Organization	Role	Email
Bert Kiburg	KMar	Liaison Officer in Nigeria	bert.kiburg@minbuz
Eleni Zerzelidou	EU Delegation - Abuja	Migration expert EU Delegation	a.nl Eleni.ZERZELIDOU@eeas.europa.eu
Kehinde Akomolafe	NAPTIP	Acting Zonal Commander NAPTIP	infolagos@naptip.gov.ng
Waheed Taiwo	NAPTIP	Joint Border Task Force NAPTIP	info@naptip.gov.ng
Michel Deleen	Netherlands Representation - Lagos	Head Netherlands representation Lagos	mlh.deelen@minbuz
Margret Ukaegbu	NCFRMI	Head of the Lagos Section	a.nl margaretngozincfrmi
Amala Nwalor	ICMPD FMM Abuja	Project Officer	lag@yahoo.com amala.nwalor@icmpd.org
Matthias Esene	ICMPD FMM Abuja	Project Officer	Matthias.Esene@icmpd.org
Hartmut Zander	GIZ Police Programme Africa - Abuja	Project Officer	hartmut.zander@giz.de
Emiola Oke	IOM Nigeria	Senior Program Officer Project Officer MIDAS	eoke@iom.int esah_ogbu@yahoo.com / esahogbu@gmail.com
Julius Ogbu	NIS Headquarters	General Comptroller of Immigration Air Border Patrol -	
S Bello	NIS Headquarters	Assistant Comptroller General	aboubakr1259@gmail.com
Felix Odika	NIS Headquarters	Head of Document Fraud Unit	
Maureen Amaichigh	NIS Headquarters	Assistant Comptroller Document Fraud Unit	ammi_nadib@yahoo.com
Jummai Yammah	NIS Headquarters	Junior Officer Dir. Statistics and Research	jummaiymmah@gmail.com
Mr Lawal	NIS Headquarters	Head of Dir. Statistics and Research	rafsenlaw9@gmail.com

DFU Officers	NIS - Lagos airport	Document Fraud Unit (Operational)	
Kunle Osisanya	NIS - Abuja airport	Comptroller of Immigration	osisanyao@immigration.gov.ng

## MOROCCO

Name	Organization	Role	Email
Karel Zeijpveld	KMar	KMar ILO Spain Morocco	karel.zeijpveld@minbuza.nl
Frans Veltien	Netherlands Embassy Rabat	Police Liaison Officer	LOMarokko@politie.nl
Margrit Sebek	Netherlands Embassy Rabat	Head of the Visa Section	rab-ca@minbuza.nl
Manuel Rodriguez Diez	EU Delegation Rabat	Migration at EU Delegation	Manuel.rodriguez-diez@eeas.europa.eu
Anne Simon	EU Delegation Rabat	Project Officer	Anne.SIMON@eeas.europa.eu
Nathalie Houlou	EU Delegation Rabat	Project Officer	Nathalie.Houlou@eeas.europa.eu
Adrian Gnägi	Swiss Embassy Rabat	Focal Point	adrian.gnaegi@eda.admin.ch
Bettina Gambert	UNHCR Morocco	Head UNHCR Morocco	mokadade@unhcr.org
Eddy Greif	Belgian Embassy Rabat	Police Liaison Officer	eddy.greif@police.belgium.be
Francisco Monux	Spanish Embassy Rabat	Ministry of Interior Attache	francisco.monux@policia.es
Christian Laucher	French Embassy	Attache Interieur France	christian.laucher@diplomatie.gouv.fr
Thierry Chamard	French Embassy	Attache Interieur France	thierry.chamard@diplomatie.gouv.fr
Benjamin Bricheux	Euromed Police Project IV	Project Officer	Benjamin.Bricheux@euromed-police.eu
Michel Quille	Euromed Police Project IV	Project Officer	Michel.Quille@Euromed-police.eu
Mr. Aboubkre	VFS Global Rabat	Head of VFS for NL	P_AboubkreA@vfsglobal.com
Seloua Aguida	Customs Administration of Morocco	Head of Passenger Section	
Maria Lahdar	DGSN	Head of External Relations	pcpi@dgsn.gov.ma

# INDIA

Name	Organization	Role	Email
Erik Splinter	Netherlands Embassy	Regional Schengen Cooperation Officer	nde-rsco@minbuza.nl
Wojciech Dziworski	EU Delegation	EU Counsellor Home Affairs and Migration	Wojciech.DZIWORSKI@eeas.europa.eu
Seeta Sharma	Int. Labour Organization India	Officer - Dialogue on Mobility	sharma@ilo.org
Ralph Karsten	German Embassy	German ILO in Delhi	rk-visa20@newd.auswaertiges-amt.de
Markus Senfter	Austrian Embassy	Austrian ILO in Delhi	Markus.senfter@polizei.gv.at
Karl Leuthold	Swiss Embassy	Swiss ILO in Delhi	karl.leuthold@ezv.admin.ch
Neil Jarvis	UK Embassy	UK ILO in Delhi	Neil.Jarvis@fco.gov.uk
Anurag Pall	VFS Global		AnuragPall@vfsglobal.co
Leo de Heij	Netherlands Embassy	Police Liaison Officer European Return	leo.de.heij@politie.nl
Rain Nurmsala	EU Delegation	Liaison Officer	
Dinesh Kumar	Jet Airways	Security Manager Jet Airways	DineshK@jetairways.com
Yogesh Chowdhary	Jet Airways	Security Supervisor Jet Airways	yogesh.chowdhary2007@gmail.com
Anuj Kumar Bhatia	IOM	Head of Office	abhatia@iom.int
Malik	Border Security Forces (BSF)		
Miriam Vieth		Document and Visa Advisor / German Airline Liaison Office	rk-visa20@chenn.auswaertiges-amt.de
Stefanie Schwartz		Dutch Immigration Liaison Officer	Stefanie.Schwartz@minbuza.nl
Lennart Post		Liaison Officer Schiphol (predecessor Erik Splinter as RSCO)	pl.post@indo.minvenj.nl



## Annex 3. OSCE Overview of the use of Advanced Passenger Information (API)

