

AT THE BORDERS OF AID

Development
Cooperation and the
Externalisation of EU
and Italian Migration
Policies

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In preparing this report, ChatGPT (OpenAI) was used as a support tool for translation, language review, and text editing and, at certain stages of the research, for analysing project documentation based on criteria defined by the authors. The authors remain responsible for the methodological framework, the selection and verification of sources and data, the interpretation of the findings, and the conclusions. Content produced with the support of the tool was subject to review and verification.

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LIST OF ABBREVIATIONS

AFD – France Development Agency

AFET – European Parliament Committee on Foreign Affairs

AICS – Italian Agency for Development Cooperation

CICS – Italian Interministerial Committee for Development Cooperation

CPR – Italian Repatriation Detention Centres

DEVE – European Parliament Committee on Development

DG – European Commission Directorate-General

DG ENEST – Directorate-General for Enlargement and Eastern Neighbourhoods

DG INTPA – Directorate-General for International Partnerships

DG MENA – Directorate-General for the Middle East, North Africa and the Gulf

DG NEAR – Directorate-General for Neighbourhood and Enlargement Negotiations

DGCS – Italian Directorate-General for Development Cooperation

DGIT – Italian Directorate-General for Italians Abroad and Migration Policies

EEAS – European External Action Service

EU – European Union

EUTF – European Union Trust Fund for Africa

FAO – Food and Agriculture Organisation of the United Nations

FOI – Freedom of Information

GEWE – Gender Equality and Women's Empowerment

IDPs – Internally Displaced Persons

IOM – International Organisation for Migration

MAECI – Italian Ministry of Foreign Affairs and International Cooperation

MFF – Multiannual Financial Framework

MOCADDEM – European Council's Operational Coordination Mechanism for the External Dimension of Migration

MOI – Italian Ministry of the Interior

MoU – Memorandum of Understanding

MRCC – Maritime Rescue Coordination Centre

NDICI-GE – Neighbourhood, Development and International Cooperation – Global Europe Instrument

ODA – Official Development Assistance

OECD-DAC – Organisation for Economic Co-operation and Development, Development Assistance Committee

SDGs – Sustainable Development Goals

SGBV – Sexual and Gender-Based Violence

SIDA – Swedish International Development Cooperation Agency

SRHR – Sexual and Reproductive Health and Rights

UN – United Nations

UNDP – United Nations Development Programme

UNFPA – United Nations Population Fund

UNHCR – United Nations High Commissioner
for Refugees

UNICEF – United Nations Children's Fund

UNODC – United Nations Office on Drugs and
Crime

WFP – World Food Programme

WHO – World Health Organisation

EXECUTIVE SUMMARY AND RECOMMENDATIONS

Over the past two decades and particularly since 2015, the relationship between migration and development cooperation has undergone considerable transformation. Development cooperation and Official Development Assistance (ODA) have increasingly been incorporated into the external dimension of EU and national migration policies, supporting both development and migration control objectives. This has raised concerns both about the diversion of ODA and the progressive reorientation of development objectives towards migration deterrence.

ODA has increasingly been used to finance interventions explicitly aimed at managing and controlling migration, such as border management and return programmes, where the risks of diversion are more evident. However, migration-deterrence lenses have also contributed to the gradual reorientation of programmes traditionally focused on development towards objectives of containing mobility. A key example of this is the so-called *root causes* approach, which frames legitimate development objectives of addressing poverty, unemployment, vulnerability and lack of opportunities as means of preventing migration. This can influence resource allocation, the selection of geographical areas and beneficiaries, the choice of partners, and the definition of expected results, bringing development cooperation progressively closer to migration policy and security objectives. In the protection and forced displacement sector, interventions are generally consistent with ODA objectives and respond to concrete needs. However, some interventions are also embedded in a deterrence logic, when assistance is part of programmes aimed at border control or containment of mobility.

In light of these transformations, the report analyses EU and Italian migration cooperation programmes financed since 2020 with resources recorded as

ODA. Geographically, the report focuses on North Africa and Sub-Saharan Africa as key regions of interest for both the EU and Italian external action on migration. At the EU level, the report examines the Neighbourhood, Development and International Cooperation – Global Europe (NDICI-GE) instrument, the main instrument covering EU external action and development cooperation in the current budget period. At the Italian level, the report covers all the national funding instruments which support migration-related activities in the external dimension, namely: the Migration Fund and the Incentive Fund for Return Policies (managed by the Ministry of Foreign Affairs and International Cooperation); Chapter 2371 of the Ministry of the Interior's budget; and the Bilateral Support to Libya (managed by the Ministry of Economy and Finance). All these instruments are eligible, in whole or in part, for reporting as ODA.

The report provides a quantitative overview of budget allocations across the different instruments, distinguishing among intervention types, their geographical distribution, and their evolution over time. It then provides an in-depth qualitative analysis of a sample of projects, with key insights into the objectives, theories of change, activities, beneficiaries, and geographical focus of the main categories of intervention funded: border management, return and reintegration, protection, and root causes.

The key questions guiding the analysis are twofold: whether the projects analysed raise concerns about ODA compliance; and whether substantive diversion of aid may occur even when expenditure is formally eligible as ODA. This assessment uses two analytical frameworks: the OECD-DAC guidelines to assess the ODA eligibility of migration actions, and Policy Coherence for Development to identify broader tensions between development objectives and migration-control priorities.

KEY FINDINGS

The numbers – European Union

- » From 2021 to 2025, Sub-Saharan Africa is the region that has received most of the NDICI-GE funding from the migration and forced displacement target, with €2,8 billion allocated so far. Other regions that received the most funding are the Western Balkans and Türkiye, which received €2,7 billion; North Africa, with €1,58 billion; and the Middle East, with €1,51 billion.
- » Globally, the category of intervention that has received most of the NDICI-GE funding from the migration and forced displacement target is *Protection* (€3,8 billion), followed by *Forced Displacement* and *Migration and Border Management*, which each received €1,9 billion. *Return and Reintegration* ranks fourth at €1,1 billion, followed by *Root Causes* (€281 million), *Legal Migration and Labour Mobility* (€205 million), and other minor categories.
- » Protection ranks first globally largely because of big protection programmes in Türkiye, which alone contribute to boosting the overall budget going to protection. However, the ranking of intervention categories can vary considerably across regions: in North Africa, border management alone received 51% of the funding, followed by protection, return and reintegration, and legal migration and labour mobility. In Sub-Saharan Africa, forced displacement received 48% of the funding, followed by return and reintegration, migration and border management, root causes, legal migration and labour mobility, and other minor categories.

The numbers – Italy

- » Italian funding is strongly concentrated in North Africa and Sub-Saharan Africa. Between 2020 and 2025, the Migration Fund allocated around €242 million to third countries, with Libya receiving €78 million – about one-third of the total – and the five main recipient countries absorbing more than 60%. The Incentive Fund for Return Policies allocated approximately €87 million, of which €67 million, or over 70%, went to Tunisia.
- » *Protection* is the largest category across the two funds, but their profiles differ substantially. In the Migration Fund, protection accounts for 56% of spending, approximately €136 million. In the Incentive Fund, by contrast, more than 62% – around €54 million – is allocated to border control. This concentration makes border control the Fund's main operational function, despite its broader formal focus on return cooperation.
- » Chapter 2371 of the Ministry of the Interior is smaller in overall scale but remains relevant: between 2019 and 2024, it financed 46 projects for approximately €59 million. Through calls for proposals addressed to NGOs and local authorities, direct awards to IOM and contributions to European programmes, it mainly supports interventions on root causes and information campaigns, extending migration-related action into areas traditionally associated with development cooperation.

Diversion of ODA and policy incoherence

» **The most critical cases of ODA diversion concern border management, return and reintegration interventions.** Both EU and Italian interventions in these areas show a consistent pattern of prioritising donors' interests in preventing arrivals, conducting interceptions, and enforcing return operations along key migratory routes to Europe, at the expense of development needs and priorities of partner countries.

- In border management programmes, ODA diversion manifests itself already from the OECD-DAC framework, as all the projects analysed deviate from agreed principles and criteria despite all being reported as ODA-eligible. Their rationale is one of control and interception, which – while often misusing Search and Rescue language – clearly shows that the primary purpose is not to promote local development.
- In return and reintegration programmes, ODA diversion manifests itself when considering the overall logic and strategies that the interventions respond to. Although individual activities may align with the OECD-DAC framework, they remain embedded in a deterrence logic in which so-called 'voluntary' return is the only option available in countries along key migratory routes and can also serve to prevent arrivals in Europe.

» **The EU and Italian protection and forced displacement programmes analysed are overall aligned with ODA criteria and development priorities.** They respond to the needs of displaced populations and host communities, particularly in contexts affected by protracted displacement, conflict and severe humanitarian needs, where support for reception systems, access to services and durable solutions remain essential components of development cooperation. **However, policy incoherence can occur when protection programmes are inserted into a broader**

deterrence framework, especially in North Africa. In contexts where these objectives overlap, protection interventions may have to mitigate the impact of deterrence (for instance, by providing assistance after interceptions at sea) and are increasingly mobilised in relation to migration-control objectives.

» Root causes interventions are more complex. Over the years, and especially since 2015, standard development work on employment, training, basic services, livelihoods, and resilience has been framed as contributing to reducing so-called irregular departures. However, **if the root causes concept has been highly effective politically, its operational translation remains weak:**

- At the EU level, the European Commission developed the most concrete efforts to operationalise this concept through a specific category of intervention included in the migration and forced displacement target of NDICI-GE. However, significant discretion remains in how this category is used and defined. Root causes interventions account for a small share of the NDICI-GE target (roughly 4%) and are concentrated in Sub-Saharan Africa and Asia. Overall, individual activities align with the OECD-DAC framework, yet underlying tension persists, as these interventions are still designed and framed by their contribution to reducing departures.
- At the Italian level, there is more fragmentation across different legal and strategic frameworks that involve both the Ministry of Foreign Affairs and Development Cooperation and the Ministry of Interior. This fragmentation translates the migration-development nexus and the approach to root causes differently across specific project interventions.
- The RELINT call for proposals, financed by the Ministry of the Interior, is a key example of how this approach has been operationalised. The call for proposals has a dual objective: addressing root causes and reducing arrivals to Italy. The project proposals analysed show that root cause

logic is integrated more at the narrative level than at the operational level, due to the framework imposed by the call itself. However, its political significance remains important, as development interventions are situated within a framework in which the expected goal is preventing arrivals.

- Overall, in all the projects and instruments analysed, **the main impacts of the root causes approach are seen in the selection of territories, beneficiaries, activities, or indicators, which is primarily driven or justified by the objective of reducing departures rather than by the development priorities of partner countries.**

Incentives and conditionality

- » At the EU and Italian levels, incentives and different forms of conditionality have linked, over time, the delivery of development aid with countries' performance on migration management and return cooperation. Conditionality can take explicit forms through requirements formally attached to funding disbursements, or operate more indirectly.
- » At the Italian level, the main example of conditionality is the Incentive Fund for Return Policies, which should work as a reward budget instrument for countries that cooperate on returns and readmissions. However, the Fund's operationalisation shows a broader scope, financing interventions aimed at institutional capacity-building, border management, protection, assisted voluntary return, and reintegration.
- » At the EU level, conditionality has been operationalised in NDICI-GE through the so-called *flexible incitative approach*, which links additional funding to partner countries' cooperation on migration, following a 'more for more' logic. The implementation of this approach shows that:
 - It has been implemented differently across regions: in Sub-Saharan Africa through the €600 million Flexible Mechanism; in North

Africa, flexibility is used to adjust regional funding annually among countries based on progress and cooperation, although the amounts involved are relatively limited.

- The political nature of the *flexible incitative* approach raises concerns about ODA eligibility. While dialogue and cooperation on migration can be ODA-eligible, funding that is conditional on achieving donor-defined migration outcomes may not qualify as ODA. This makes the *flexible incitative approach* a grey area that requires assessment based on the nature and objectives of the individual activities funded.

- » Finally, the issue of conditionality is becoming increasingly relevant in the negotiations on the next Global Europe Instrument, part of the next EU long-term budget. The current proposal under negotiation introduces the possibility of suspending funding to countries that do not cooperate on readmissions. This new form of negative conditionality would clearly depart from ODA principles by directly linking development funding to EU migration objectives, further diverting aid from development to deterrence.

These findings also point to a governance problem in the EU and Italian external migration action. Funding decisions are still made and implemented without adequate safeguards to assess risks in advance, monitor their effects or establish responsibility for violations and unintended consequences. Future EU instruments should therefore require systematic human rights and development risk assessments, transparent reporting, ongoing monitoring and clear procedures for corrective action or suspension. The same framework should apply in Italy to funding, equipment and training provided to third-country authorities. Parliamentary scrutiny must take place before high-risk measures are approved or resources are reallocated, rather than after their effects have already occurred. These safeguards are also necessary to prevent development cooperation from being linked

to donor-defined migration outcomes without adequate public and democratic control.

Finally, the paper calls for a fundamental rethinking of the migration–development nexus within external funding instruments, with a view to strengthening a genuinely development-oriented external migration policy. Development cooperation will remain a structural component of external migration action, given the close interlinkages between mobility and development and the role of cooperation in engaging with partner countries on the conditions and consequences of mobility. However, development cooperation should not be instrumentalised to achieve migration-management objectives, such as reducing departures or securing returns, at the expense of development priorities. Instead, external migration action should be anchored in partner countries’ priorities and development strategies and guided by the principle of Policy Coherence for Development. This requires a shift in perspective and practice: starting from the realities and priorities of countries of origin and transit, and meaningfully involving local actors in defining problems, setting priorities, allocating resources and assessing results. Only then can mobility be recognised in its possible contributions to development, while cooperation can support people’s ability to choose whether to stay or to migrate.

RECOMMENDATIONS

COMPLIANCE WITH ODA RULES

The analysis of EU and Italian migration programmes in the external dimension revealed a pattern of deviation from ODA principles and rules, despite classifying individual projects and/or funding instruments as ODA-eligible, in whole or in part. To ensure better compliance and respect for ODA boundaries, as well as appropriate reporting:

The European Commission and the Italian Government should:

- » Ensure that external migration programming truly aligns with the promotion of economic development and welfare of a developing country, as enshrined in the EU Treaties and OECD guidelines.
- » More accurately follow and respect the boundaries of ODA eligibility agreed upon by DAC members in the OECD guidelines adopted in 2022, which define six principles and eight criteria for ODA eligibility of migration actions. This could be improved, particularly by:
 - Being explicit in the *primary goal* of activities funded, as this is key to determining ODA eligibility. Activities whose primary goal is to curb migratory flows and reduce arrivals to Europe are non-ODA-eligible, as they respond to donors’ interests rather than partner countries’ development priorities.
 - Respect the boundaries identified in Criterion 4 of the OECD guidelines concerning ODA eligibility of border management and addressing so-called irregular migration. In particular, Search and Rescue activities are ODA-eligible only if rescue is the primary goal and the costs are additional to the regular running costs of Coast Guard operations. Actions aimed at building infrastructure for systematic interception, surveillance, and border patrol are not eligible.
 - Respect the boundaries identified in Criterion 5 of the OECD guidelines

concerning ODA eligibility of return operations and Criterion 3 for projects that are supposed to respond to mutual benefits of the donor and partner countries.

- » Adapt or suspend non-ODA-eligible actions to ensure their ODA eligibility in future programming. Particular attention should be given to border management and return programming as key intervention categories where the primary goal often diverts from promoting local development.
- » Work with partner-country governments, local civil society organisations, and other local stakeholders to design migration and forced displacement programmes that are aligned with local needs and priorities, and foster country ownership – also by conducting extensive consultations at the local level with a variety of stakeholders including local civil society.

In particular, the European Commission should:

- » More carefully assess the percentage of ODA eligibility assigned to actions in the areas of border management and return, where deviation from ODA boundaries is higher, but actions tend to be tagged as 100% ODA-eligible.
- » For those actions where ODA eligibility is lower than 100%, clarify which activities and objectives are counted as ODA-eligible and which aren't.
- » Apply the principles and criteria identified in the 2022 OECD guidelines comprehensively, across categories of interventions and respective DAC codes. In particular, border management actions tagged under code 15210 - *Security System Management and Reform* (rather than the more commonly used 15190 - *Facilitation of orderly, safe, regular and responsible migration and mobility*) still need to comply with the overall principle of promoting economic development and the welfare of a developing country to qualify as ODA.

In particular, the Italian Government should:

- » Apply at project level the same ODA-eligibility approach recommended for EU actions: indicate the percentage of each project that qualifies as ODA, specify the activities and objectives included in that share, and report the relevant DAC codes, applying the 2022 OECD-DAC criteria consistently across intervention categories, including border-management projects coded 15210.

AID CONDITIONALITY LINKED TO MIGRATION COOPERATION

European and Italian funding instruments have integrated forms of conditionality in various ways. So far, incentives and reward mechanisms (also called 'positive' conditionality or 'more for more' approach) are prevalent, especially at the EU level in the NDICI-GE Instrument and at the Italian level in the Incentive Fund for Return Policies. However, discussion of stricter forms of conditionality, including aid suspension, linked to migration and return cooperation is becoming central to the negotiations on the next EU long-term budget. To ensure policy coherence and adherence to development objectives:

The European Commission and the Italian Government should:

- » Reject forms of conditionality that link the delivery of aid to partner countries' performance on migration and return policies. Such forms of conditionality (known as negative conditionality) fully deviate from ODA rules and the objectives of development cooperation. They impose an external agenda on migration and return to access resources meant for economic development and welfare and show policy incoherence in the EU's and Italy's external action on development and migration. Lastly, they risk harming local communities and populations by cutting crucial programmes and assistance.
- » Where forms of incentives and 'more for more' approaches are implemented, ensure

that the projects funded are aligned with partner countries' local needs and priorities, for instance in the areas of protection, forced displacement response, legal pathways and labour mobility or, more broadly, development programmes that encompass migrants, refugees and IDPs. Instead, if these approaches impose a donor-driven agenda on migration, they are beyond the scope of ODA.

- » Align to the boundaries established by Criterion 2 of the OECD guidelines concerning conditionality, which clarifies that development cooperation programmes can be part of a broader policy dialogue with the partner country, but an activity is not reportable as ODA if the delivery of funds is subject to specific conditions and migration outcomes. This could be improved particularly by:

- Proactively describing the characteristics of the aid, including any forms of conditionality, linked to the individual programmes or the funding instruments they are part of, in the descriptions of projects and reporting to the OECD.

In particular, the European Commission should:

- » Conduct a public evaluation of the *flexible incitative approach* to assess its functioning, added value, results and perception from partner countries.
- » Use the *flexible incitative approach* to finance actions that are fully aligned with development objectives, partner countries' priorities and ODA rules. In particular, actions in the areas of protection, forced displacement response, legal pathways and labour mobility are generally aligned with development objectives and are ODA-eligible.

Finally, the European Commission, European Council and European Parliament, in the ongoing negotiations on the next Global Europe Regulation should:

- Reject Article 12(3-5), which allows for the possibility to suspend funding or the

implementation of programmes if a partner country is deemed uncooperative on return and readmissions. This article explicitly contradicts Criterion 2 of the OECD guidelines and clearly illustrates policy incoherence between the EU's external action on migration and its development cooperation. Beyond harming the EU's reputation as a donor and partner, such negative conditionality could also severely affect local development programmes and the communities affected by their suspension.

EXPANDING MIGRATION-DEVELOPMENT PROGRAMMING AWAY FROM DETERRANCE

The migration-development nexus has been operationalised through an extremely narrow form of programming, namely the *root causes* approach. Alongside this, key categories of EU and Italian funding support areas of intervention such as border management and returns, where development assistance is used to deter migration and prevent arrivals. In future programming and funding instruments:

The European Commission and the Italian Government should:

- » Prioritise funding allocations to areas of intervention that reflect partner countries' development needs and priorities and are aligned with development objectives and ODA rules.
- » Areas of programming that should be expanded are:
 - **Legal pathways**, such as resettlement, family reunification, humanitarian corridors and other protection schemes. At both the EU and Italian level, these constitute a minimal part of the funding. However, these programmes are essential to ensure access to safe and legal mobility, prevent violations and deaths along migratory routes, and reduce reliance on smuggling networks.

- **Educational and labour mobility schemes.** While these are essential for harnessing the positive potential of mobility for local development and skills transfer, they remain highly selective and largely underfunded at both the EU and Italian levels.
- **Engagement of diasporas and transfers of remittances.** Such programmes can facilitate the transfer of resources, knowledge and skills and contribute to local development of countries of origin, yet they remain underfunded.

» Areas of programming that should be maintained and strengthened are:

- **Development-oriented solutions for migrants, forcibly displaced persons, IDPs and their host communities,** including through socio-economic inclusion, access to the labour market, decent jobs, education and services, to promote the dignity, resilience and self-reliance of displaced persons – beyond the *root causes* logic. Such programmes should be strengthened for their developmental potential, not the potential to reduce arrivals to Europe.
- **Protection and forced displacement programmes,** as they address crucial needs of refugees, IDPs, forcibly displaced people and host communities. These interventions foster protection, social cohesion, local integration, and durable solutions, and will remain essential in the short, medium, and long term.
- At the same time, protection interventions should remain genuinely anchored in local needs of communities and not used to either correct the negative impact of migration deterrence programmes such as in the area of border management, or create presumptions of safety used to outsource asylum and international protection.

HUMAN RIGHTS DUE DILIGENCE

The question of human rights due diligence in funding for external migration programming can no longer be postponed. As evidence of human rights violations – especially in the context of border management programmes – has increased over the years, future programmes and funding instruments should centre on a human rights-based approach and do-no-harm principle.

In particular, the European Commission should:

- » Implement the recommendations coming from the European Court of Auditors' Special Report 17/2024 and publicly report on new procedures developed to meet these recommendations.
- » Conduct systematic *ex-ante* human rights impact assessment and gender analysis to inform the design of programmes and relevant mitigating measures.
- » Conduct systematic human rights monitoring during projects' implementation and put in place mitigating measures – including suspension of programmes and/or future funding – should violations in the context of an EU-funded project be confirmed.
- » Publicly disclose if new procedures for reporting and following up human rights allegations were developed after the Court of Auditors' recommendations, and if so, what they entail. In particular, information remains missing on:
 - how external actors, including local CSOs, can safely report alleged violations and be informed of the steps the Commission takes after such abuses are reported.
 - how individuals can seek redress through safe and clear procedures for submitting complaints, appropriate reparations, and mechanisms to ensure that findings result in corrective action.
- » If mitigating or corrective measures have been applied, especially in the context of NDICI-GE funded border management projects, clarify

how they have been assessed and how they informed future programming.

- » Clarify why a suspension of programmes – especially in the area of border management – in line with Article 29 of the NDICI Regulation was not considered an appropriate corrective measure so far, and what would trigger such a suspension in future programming.

In particular, the Italian Government should:

- » Adopt a domestic legal framework establishing an explicit human rights due diligence obligation for State-funded cooperation with third countries. The obligation should apply where Italian funding, equipment, transport assets, training, or operational support gives Italy the capacity to influence activities that may create or exacerbate human rights risks.
- » Conduct systematic *ex-ante* human rights impact assessment and gender analysis to inform the design of programmes, identify foreseeable risks, evaluate the likelihood and severity of potential violations, and identify corrective and mitigating measures.
- » Conduct systematic human rights monitoring during projects' implementation and put in place mitigating measures – including suspension of programmes and/or future funding – should violations in the context of funded projects be confirmed.
- » Where serious risks of human rights violations are identified, the Italian government should require concrete mitigation measures before support is provided and suspend or withdraw assistance where those measures are not implemented. Such measures should also include accessible and effective mechanisms for individuals affected by Italy-supported activities to seek redress through clear, safe procedures for submitting complaints, appropriate reparations, and mechanisms to ensure that findings result in corrective action.

TRANSPARENCY

The issue of lack of transparency is central to externalisation policies and funding instruments.

Due to the multiplicity of actors involved, the plurality of funding streams, the resort to informal arrangements, and a growing share of documents treated as inaccessible, information is often opaque, partial, or inaccessible. This limits scrutiny and accountability of public resources for both civil society and the European and national parliaments. To increase transparency:

The European Commission should:

- » Centralise information and documentation of all NDICI-GE projects managed across Commission DGs and services into a single website or database that allows for filtering across Commission service, budget line, spending targets, policy markers and DAC codes assigned. The recently published list of all adopted actions on the migration and forced displacement target of NDICI-GE can serve as a basis for developing a centralised platform for all NDICI-GE projects.
- » Provide the European Parliament and Council with the same level of information sharing, access to documents and ability to scrutinise public budgets. In particular, documents shared in the MOCADDEM group or the NDICI Coordination Group on migration and forced displacement should also be shared and accessible to the European Parliament.
- » Include more detailed information on the migration and forced displacement component of NDICI-GE in the *Annual Reports on the Implementation of External Action Instruments*. In particular, the information should cover actions adopted under the migration and forced displacement target, whether these Actions were reported as ODA-eligible, findings from human rights monitoring, and any corrective or mitigating measures adopted.

The European Parliament should:

- » Request that some of its representatives take part in the NDICI Coordination Group on migration and forced displacement, together with the representatives from the European Commission and Member States. This is

especially relevant if the Group is renewed under the next Global Europe Instrument.

- » Clarify and adopt an internal procedure to formally object, where there is a political majority, to Commission Delegated Acts financing new actions under NDICI-GE and future funding instruments.
- » In the ongoing negotiations of the next Global Europe Instrument, ensure that greater mechanisms for parliamentary scrutiny of EU external action, including on migration, are in place. These could include:
 - An obligation for the European Commission to issue an annual report that includes breakdowns of migration-related spending, specific actions, ODA eligibility and results from human rights monitoring, including any corrective or mitigating measures implemented
 - *(if conditionality is maintained)* An obligation for the European Commission to inform the European Parliament before conditionality measures are triggered

The Italian Government should:

- » Create a public and up-to-date database on projects funded under the external dimension of migration policies. For each project, the database should indicate the funding instrument, the responsible Ministry, the title, the budget, the implementing partners, the relevant documentation, the share eligible as ODA, and the corresponding DAC codes.
- » Repeal or substantially narrow the broad exemptions from access to information on migration introduced by the Ministry of the Interior's decree of 16 March 2022, as well as the exemptions concerning procurement and confidentiality introduced by Decree-Law No. 145/2024, converted into Law No. 187/2024. Any restriction should be strictly justified, proportionate, and limited to information whose disclosure would cause specific, serious, and demonstrable harm.
- » Present an annual comprehensive report to Parliament, in conjunction with the budget cycle, on the resources allocated to migration-

related activities in third countries. The report should include information on funded projects, the funding instruments used, the responsible Ministries, the implementing partners, ODA eligibility, the DAC codes applied, human rights monitoring, and any corrective measures adopted.

The Italian Parliament should:

- » Adopt legislation extending its inspection and information-gathering powers to public funds deployed beyond national borders. Such powers should include access to agreements, procurement documentation, contracts, monitoring reports, and information on the use of transferred equipment.
- » Establish a permanent interparliamentary oversight mechanism, involving the Foreign Affairs, Interior, Defence, and Budget Committees, to examine the resources allocated to migration cooperation by the various Ministries and monitor their implementation also outside the normal budget cycle.
- » Introduce prior parliamentary scrutiny of high-risk measures within the external dimension of migration policies, including border management operations, returns, the transfer of equipment, and the training of authorities in third countries. Before committing or reallocating resources, the Government should provide information on the legal basis, objectives, funding, risks to human rights and development, and the monitoring mechanisms envisaged.
- » Allow the relevant parliamentary committees to conduct or commission independent fact-finding missions in third countries to verify the implementation and effects of migration-related activities financed with public resources.
- » Where ordinary oversight mechanisms are insufficient, establish a parliamentary committee of inquiry vested with the powers of a judicial authority to examine conduct that remains beyond the reach of ordinary oversight mechanisms.

1 - DEVELOPMENT COOPERATION AND THE EXTERNAL DIMENSION OF MIGRATION POLICIES

1.1 - Migration, Development and Externalisation: The Role of Development Cooperation

Over the past two decades, and particularly since 2015, the relationship between migration and development cooperation has undergone a profound transformation. Migration has become an increasingly prominent priority in development policies, while Official Development Assistance (ODA) has been progressively incorporated into the external dimension of migration policies of the European Union (EU) and its Member States. Against this backdrop, the EU and numerous national governments – with particular reference, in this report, to Italy – have developed financial instruments, strategies and programmes that deploy development cooperation resources to pursue a range of objectives. On the one hand, this has involved supporting activities directly related to the management of mobility, such as border control, returns, reintegration and institutional capacity-building; on the other, it has involved interventions in areas traditionally associated with development, such as social protection, employment, training, livelihoods and initiatives aimed at addressing the so-called *root causes* of migration.

The main concerns arise on two fronts. First, ODA may finance interventions directly aimed at managing and controlling migration, which risks diverting development cooperation from its core objectives. Second, and less immediately visible, programmes traditionally focused on development may gradually be reoriented toward deterring and containing migration. The idea that greater development opportunities

will lead to less migration can shape the design of such interventions. It may influence the selection of areas and beneficiaries, as well as the definition of objectives and indicators. As a result, development priorities may become increasingly subordinated to the objective of preventing migration. This approach also tends to treat mobility as a homogeneous phenomenon, without distinguishing among internal, seasonal, circular, regional or cross-border migration. This risks overlooking the contribution that different forms of mobility can make to employment, economic exchange, livelihood diversification, and the resilience and adaptation strategies of individuals and communities. It is therefore important to examine how ODA has been progressively incorporated into the external dimension of migration policy, which instruments and mechanisms have been used, and what implications this has for achieving development objectives.

A third issue also needs to be considered. Examining how ODA is used is essential for assessing the extent to which development resources have been redirected – or diverted – towards migration management. However, this alone does not capture the broader development effects of externalisation policies. Assessing these effects requires a medium- to long-term perspective that considers the impact of such policies, regardless of funding source, on local economies, mobility patterns, fundamental rights, institutional capacity, and the longer-term development prospects of affected communities.

This report focuses on the first two concerns: the use of ODA to finance interventions aimed

at managing and controlling migration, and the reorientation of traditional development programmes towards the objectives of containing mobility and reducing departures. The medium- to long-term impacts of externalisation policies are considered primarily in relation to their policy implications. They provide an important basis for identifying potential risks and areas of concern, as well as for informing future research, monitoring, and evaluation activities.

1.2 - The Migration–Development Nexus: The Changing Policy Question

Tracing the evolution of the debate on the migration–development nexus helps in understanding how development cooperation has been incorporated into strategies aimed at deterring and containing mobility. Different interpretations of this nexus have moved from the theoretical sphere to shape priorities, instruments and objectives of public policies. Early interpretations focused primarily on the risks associated with migration, from brain drain and dependence on remittances to the reproduction of inequalities. From the 2000s onwards, these were gradually complemented by more favourable perspectives. During this period, the role of remittances, diasporas and the circulation of skills helped establish a view of migrants as actors capable of generating positive effects on development processes in countries of origin.¹

However, changes in development theories alone cannot explain how the relationship between migration and development has evolved. Political priorities have also shaped how the nexus has been interpreted. Initially, the debate focused on the contributions migration could bring to economic and social development in countries of origin, highlighting the roles of remittances, diasporas, and skill circulation. However, as

mobility control gradually emerged as a policy priority, this perspective shifted. Development cooperation came to be viewed not only as a tool for promoting well-being and opportunities, but also as a means of influencing migration movements, capable of preventing, reducing, and steering them. **The policy question has changed: it no longer focuses solely on how migration can contribute to development processes, but also on how development can prevent migration.**²

The literature has increasingly challenged the idea of a direct relationship between development and migration. Improvements in economic and social conditions do not necessarily translate into reduced mobility. On the contrary, particularly in the short and medium term, increases in income, education and opportunities may expand the capabilities and resources needed to migrate. At the same time, the effects of migration are not unidirectional. The contribution that migration can make depends on the context in which it takes place: the quality of institutions, the functioning of labour markets, the level of inequality and, more broadly, the economic, social and political conditions in countries of origin, transit and destination.³

The shift from early views of this nexus to more restrictive interpretations of migration as a consequence of poverty, instability, unemployment, and limited opportunities⁴ affected the role attributed to development policies and development cooperation. **The objective is no longer only to support development processes and harness the contribution of mobility, but also to address the conditions considered to be at the root of departures. This shift forms part of a broader process through which the EU has progressively integrated development cooperation, relations with third countries and**

¹ Hein de Haas, The Migration and Development Pendulum: A Critical View on Research and Policy, *International Migration*, vol. 50, n. 3, 2012. <https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1468-2435.2012.00755.x>

² Martin Geiger and Antoine Pécoud, Migration, Development and the 'Migration and Development Nexus', *Population, Space and Place*, vol. 19, n. 4, 2013. <https://onlinelibrary.wiley.com/doi/abs/10.1002/psp.1778>

³ Hein de Haas, Migration and Development: A Theoretical Perspective, *International Migration Review*, vol. 44, n. 1, 2010. <https://journals.sagepub.com/doi/10.1111/j.1747-7379.2009.00804.x>

⁴ Oliver Bakewell, Reshaping the Intersection Between Development and Migration Studies, *International Migration*, vol. 64, n. 2, 2026.

the management of mobility into the external dimension of its migration policy.⁵

From 2015 onwards, this approach became a main pillar of European external programming and the policies adopted by its Member States. Development policies have increasingly been oriented towards pursuing objectives aimed at reducing so-called irregular migration and containing mobility in countries of origin and transit. The shift concerned both the language of policy strategies and the design of interventions. Programmes focusing on employment, livelihoods, social protection, and local development have been incorporated into an intervention framework in which development objectives coexist with migration-management objectives, which increasingly shape the evaluation criteria for these programmes. At the same time, a growing share of European and national resources has been allocated to initiatives addressing so-called *root causes*, migration management and the strengthening of border controls.⁶ In this way, **ODA is increasingly integrated into the external dimension of migration policies, supporting mobility-management interventions and contributing to objectives related to deterrence, border control, and returns through closer cooperation with third countries.**

1.3 - “Root Causes” as a Policy Instrument for Deterrence

The *root causes* approach has been a key framework for promoting greater integration between development cooperation and migration policies. At the heart of this approach lies the idea that addressing the economic, social and institutional conditions in countries of origin can help reduce migratory pressures and, consequently, departures. However, the available

evidence presents a more complex picture. The relationship between migration and development is not linear, and mobility cannot be understood solely as a problem to be prevented. In many contexts, it represents a strategy through which individuals and households access employment, diversify their income sources, cope with risks, and strengthen their capacity to adapt. How people move is also not determined solely by conditions in countries of origin. Policies adopted by destination countries – from the availability of regular channels to entry rules, asylum systems and border controls – have a decisive impact on opportunities for mobility and on whether it takes place under regular and safe conditions or, conversely, in irregular and precarious circumstances. An exclusive focus on the presumed *root causes* of migration directs policy attention towards conditions in countries of origin and risks framing development cooperation primarily as a tool to reduce migration. This can overlook the role of migration policies in shaping how mobility contributes to development rather than becoming a source of vulnerability.⁷

The *root causes* approach assumes a central role in development cooperation programming decisions, but its significance extends beyond the operational dimension. Before being a set of interventions, it represents a political and narrative framework through which migration, particularly so-called irregular migration, is interpreted as the result of poverty, unemployment, instability and other conditions of vulnerability in countries of origin. This framing incorporates objectives of deterring and containing mobility into a development agenda, thereby conferring broader political legitimacy. Poverty reduction, the creation of economic opportunities, the strengthening of livelihoods, and the promotion of stability remain stated objectives of interventions. Increasingly, however, decisions about what to fund, where

⁵ Sandra Lavenex and Rahel Kunz, The Migration–Development Nexus in EU External Relations, *Journal of European Integration*, vol. 30, n. 3, 2008. https://www.researchgate.net/publication/247500287_The_Migration-Development_Nexus_in_EU_External_Relations

⁶ Cathrine Talleraas, The Role of EU Development Cooperation in Addressing Irregular Migration in Africa, European Parliament, Directorate-General for External Policies, 2025. [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485)

⁷ Jørgen Carling and Cathrine Talleraas, Root Causes and Drivers of Migration: Implications for Humanitarian Efforts and Development Cooperation, Peace Research Institute Oslo, 2016. <https://www.prio.org/publications/9229>; Natascha Zaun e Olivier Nantermoz, Depoliticising EU Migration Policies: The EUTF Africa and the Politicisation of Development Aid, *Journal of Ethnic and Migration Studies*, vol. 49, n. 12, 2023. https://www.researchgate.net/publication/385754026_Depoliticising_EU_migration_policies_the_EUTF_Africa_and_the_politicisation_of_development_aid

to intervene and how to measure results are also influenced by the expectation that such interventions will reduce departures. This is how the *root causes* approach shapes development cooperation: by influencing resource allocation, the selection of territories and beneficiaries, the choice of partners, and the definition of expected outcomes, it progressively brings **development cooperation, migration policies, and security objectives closer together**.⁸

The growing integration of development cooperation and migration governance dates back well before 2015. As early as the 1990s, the EU had begun incorporating migration into its external action, recognising a link between migration dynamics and the economic, social and political conditions of countries of origin. This approach was consolidated at the 1999 Tampere European Council and in the 2002 Commission Communication on Immigration and Asylum Policies, which promoted greater coordination between migration policies, development cooperation, and relations with third countries.⁹ Further steps were taken with the *Global Approach to Migration* in 2005 and the *Global Approach to Migration and Mobility* in 2011.¹⁰ Both helped establish a common framework in which migration and development were addressed alongside other pillars of European migration policy, such as regular mobility, international protection, readmission, and tackling so-called irregular migration.

However, 2015 marks a turning point. With

the Valletta Summit and the establishment of the European Union Emergency Trust Fund for Africa (EUTF), the reference to *root causes* ceased to be only a guiding principle. It began to be reflected in programming and funding decisions. Development, stabilisation, migration management, return, and border-control interventions were merged into a single strategic framework, strengthening the role of development cooperation in pursuing objectives aimed at preventing departures and containing mobility.¹¹ With the introduction of the NDICI–Global Europe instrument, the link between development cooperation and migration policies was incorporated into the ordinary financial architecture of the EU's external action, giving it a more stable, structural character.¹²

One factor explaining the spread of the *root causes* approach is its considerable flexibility. The concept does not identify a defined set of causes of migration; rather, it can encompass economic, social, political, institutional and environmental factors. This breadth allows very different types of interventions to fit under the same framework, from vocational training and support for livelihoods and local communities to information campaigns. While this flexibility facilitates integration into development cooperation programming and adaptation to different policy priorities, it also makes it harder to establish a causal link between funded interventions and the migration objectives being pursued. It is often unclear through which mechanisms a given intervention is expected to affect mobility, which forms of migration it

⁸ Oliver Bakewell, 'Keeping Them in Their Place': The Ambivalent Relationship between Development and Migration in Africa, *Third World Quarterly*, vol. 29, n. 7, 2008; Cathrine Talleraas, The Role of EU Development Cooperation in Addressing Irregular Migration in Africa, European Parliament, 2025. [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485)

⁹ European Commission, Communication from the Commission to the Council and the European Parliament on Immigration and Asylum Policies, COM(94) 23 final, Brussels, 23 February 1994. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:51994DC0023>; European Council, Conclusions of the Presidency of the Council of Tampere, 15-16 October 1999, paragraphs 10-27. https://www.europarl.europa.eu/summits/tam_it.htm; European Commission, Integrating Migration Issues in the European Union's Relations with Third Countries, COM(2002) 703 final, Brussels, 3 December 2002. <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2002:0703:FIN:EN:PDF>

¹⁰ European Council, Presidency Conclusions – Brussels European Council, 15-16 December 2005, doc. 15914/1/05 REV 1, Annex I, Global Approach to Migration: Priority Actions Focusing on Africa and the Mediterranean. <https://data.consilium.europa.eu/doc/document/ST-15914-2005-REV-1/en/pdf>; European Commission, The Global Approach to Migration and Mobility, COM(2011) 743 final, Brussels, 18 November 2011. <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2011:0743:FIN:EN:PDF>

¹¹ 11th Valletta Summit on Migration, Political Declaration and Joint Valletta Action Plan, 11-12 November 2015. <https://www.consilium.europa.eu/it/meetings/international-summit/2015/11/11-12/>; European Commission, COMMISSION DECISION of 20 October 2015 on the establishment of a European Union Emergency Trust Fund for stability and addressing root causes of irregular migration and displaced persons in Africa. [https://ec.europa.eu/transparency/documents-register/detail?ref=C\(2015\)7293&lang=it](https://ec.europa.eu/transparency/documents-register/detail?ref=C(2015)7293&lang=it)

¹² Regulation (EU) 2021/947 of the European Parliament and of the Council of 14 June 2021 establishing the Neighbourhood, Development and International Cooperation Instrument – Global Europe [2021] OJ 2 209/01. <https://eur-lex.europa.eu/eli/reg/2021/947/oj/eng>

is intended to influence, or how to measure its effects.¹³

As we will examine in Chapter 4.2, this approach presents significant operational challenges. The first concerns the causal assumption underlying the *root causes* approach. Migration does not result from a circumscribed set of economic or environmental factors in countries of origin, but from the interaction between individual aspirations, economic resources, social networks, inequalities, opportunities for mobility and political contexts.¹⁴ Moreover, available evidence shows that in the short and medium term, increases in income, education and opportunities may increase people's ability to migrate. Beyond the usefulness of these interventions per se, the key issue lies with the idea that they can be deployed as instruments of deterrence.¹⁵

A second issue concerns how the migration objective and target groups are defined for the interventions. Programmes targeting 'migrants' or 'potential migrants' often tend to group under the same category very different forms of mobility, which are often interconnected. Internal mobility may precede international migration, while the distinction between regular and so-called irregular migration largely depends on the entry rules and policies of destination countries. The risk is reducing different forms of mobility to a single problem, while they instead support access to employment, trade, income diversification, and household and local economies.¹⁶

The last concern relates to aid allocation. When countries, territories, and beneficiaries are selected primarily based on their positions along migratory routes towards Europe, resource distribution risks responding more to donors' migration interests than to the needs of partner countries. **In this context, poverty reduction, employment, and vulnerability reduction are no longer autonomous objectives of development cooperation but are used to reduce departures. Therefore, aid diversion concerns not only the possible financing of activities ineligible for ODA, but also the gradual shift in development cooperation priorities towards objectives of containing mobility.**¹⁷

Since 2015, the *root causes* approach has played a central role in integrating development cooperation into the external dimension of European migration policy. It has turned an internal crisis within the EU into the external sphere, transforming it into an 'upstream' intervention agenda in countries of origin and transit and mobilising existing funds, operational structures and relationships to this end. The political strength of this approach lies in its ability to frame deterrence objectives in the language, instruments and resources of development cooperation, even if the available evidence remains limited and contested. This has allowed both to orient programmes on employment, training, livelihood support, and stabilisation towards reducing departures, and to gradually expand the activities eligible for ODA

¹³ Cathrine Talleraas, The Role of EU Development Cooperation in Addressing Irregular Migration in Africa, European Parliament, Directorate-General for External Policies, 2025. [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485); Jørgen Carling, Nando Caso, Jessica Hagen-Zanker and Melissa Rubio, The Multi-level Determination of Migration Processes, MIGNEX Background Paper, Peace Research Institute Oslo, 2023. <https://www.mignex.org/d061>

¹⁴ Hein de Haas, A Theory of Migration: The Aspirations-Capabilities Framework, Comparative Migration Studies, vol. 9, n. 1, 2021. <https://link.springer.com/article/10.1186/s40878-020-00210-4>; Jørgen Carling and Kerilyn Schewel, Revisiting Aspiration and Ability in International Migration, Journal of Ethnic and Migration Studies, vol. 44, n. 6, 2018. <https://www.tandfonline.com/doi/full/10.1080/1369183X.2017.1384146>

¹⁵ Hein de Haas, Turning the Tide? Why Development Will Not Stop Migration, *Development and Change*, vol. 38, n. 5, 2007. https://www.researchgate.net/publication/44838212_Turning_the_Tide_Why_Development_Will_Not_Stop_Migration; Michael A. Clemens and Hannah M. Postel, Deterring Emigration with Foreign Aid, *Population and Development Review*, vol. 44, 2018. <https://www.cgdev.org/publication/deterring-emigration-foreign-aid-overview-evidence-low-income-countries>

¹⁶ Oliver Bakewell, Undocumented Migration and Development, in Tanja Bastia and Ronald Skeldon, Routledge Handbook of Migration and Development, Routledge, 2020; Cathrine Talleraas, The Politics of Migration Policy Implementation in Ghana, Governance, vol. 38, n. 1, 2025. <https://onlinelibrary.wiley.com/doi/10.1111/gove.12848>

¹⁷ Natascha Zaun and Olivia Nantermoz, "Depoliticising EU Migration Policies: The EUTF Africa and the Politicisation of Development Aid", *Journal of Ethnic and Migration Studies*, vol. 49, n. 12, 2023. <https://www.tandfonline.com/doi/full/10.1080/1369183X.2023.2193711>; Carlos Vargas-Silva, Jessica Hagen-Zanker, Jørgen Carling, Irene Carrasco, Mathias Czaika, Melissa Godin and Marta Bivand Erdal, *Tackling the Root Causes of Migration*, MIGNEX Background Paper D6.5, Peace Research Institute Oslo, 2023. <https://www.mignex.org/d065>

to include migration control, return, readmissions and migration governance interventions.

This evolution forms part of a broader transformation of the international development agenda, in which migration has increasingly become an area of policymaking, measurement and management. Target 10.7 of the Sustainable Development Goals calls for facilitating ‘orderly, safe, regular and responsible’ migration through planned and well-managed migration policies.¹⁸ The *Global Compact for Safe, Orderly and Regular Migration* consolidates this approach by recognising mobility’s contribution to development, while situating its promotion within a framework grounded in cooperation, regulation, and strengthened institutional capacity.¹⁹

In the European context, migration management has adopted a deterrence-based approach. The language of safe and regular migration is incorporated into a strategy that prioritises preventing departures, strengthening borders, and returns, and cooperating with countries of origin and transit. Therefore, while the international framework has helped consolidate migration as a policy area, the EU has developed a version of this approach that is more directly geared towards containment and the externalisation of migration control. The New Pact on Migration and Asylum has further reinforced this.²⁰

1.4 - Development Impacts of Migration Externalisation Policies

Externalisation refers to the strategies through which the EU extends the objectives, instruments, and functions of migration governance beyond its own territory. Through agreements with third countries, funding, technical assistance, incentives, and other forms of cooperation, countries of origin and transit, international organisations, and other actors are involved in preventing departures, managing mobility, controlling transit and borders, and return and readmission activities.²¹

Using development cooperation to pursue migration objectives is an important part of this process, but it does not capture its full scope. Beyond redirecting ODA towards migration deterrence and containment, it is also important to consider the wider effects of externalisation policies in the countries where they are implemented.

These effects mainly result from measures designed to manage and control mobility, but they can also arise from *root causes* programmes when conventional development cooperation tools are used to reduce migration.²² The effects are multidimensional and not limited to the results of individual programmes. They may concern the use of development cooperation resources, local economies and mobility systems, institutions and relations between donors and partner countries, and people’s rights and protection. They may be

¹⁸ UN General Assembly, Transforming Our World: The 2030 Agenda for Sustainable Development, Resolution A/RES/70/1, 25 September 2015. <https://docs.un.org/en/A/RES/70/1>

¹⁹ UN General Assembly, Global Compact for Safe, Orderly and Regular Migration, Resolution A/RES/73/195, 19 December 2018. <https://digitallibrary.un.org/record/1660537?ln=en&v=pdf>

²⁰ European Commission, COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS on a New Pact on Migration and Asylum, COM(2020) 609 final, Brussels, 23 September 2020. https://eur-lex.europa.eu/resource.html?uri=cellar:85ff8b4f-f13-11ea-b44f-01aa75ed71a1.0018.02/DOC_1&format=PDF; Council of the EU, The Council adopts the EU Pact on Migration and Asylum, 14 May 2024. <https://www.consilium.europa.eu/it/press/press-releases/2024/05/14/the-council-adopts-the-eu-s-pact-on-migration-and-asylum/>; Regulation (EU) 2024/1351 of the European Parliament and of the Council of 14 May 2024 on asylum and migration management, Official Journal, 22 May 2024. https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=OJ:L_202401351

²¹ Salvatore Fabio Nicolosi, Externalisation of Migration Controls: A Taxonomy of Practices and Their Implications in International and European Law, *Netherlands International Law Review*, 71(1), 2024. <https://link.springer.com/article/10.1007/s40802-024-00253-9>

²² Cathrine Talleraas, The Role of EU Development Cooperation in Addressing Irregular Migration in Africa, European Parliament, Directorate-General for External Policies, 2025. [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485); Martin Lemberg-Pedersen, Manufacturing Displacement: Externalization and Postcoloniality in European Migration Control, *Global Affairs*, vol. 5, n. 3, 2019; Eleni Xanthopoulou, Mapping EU Externalisation Devices Through a Critical Eye, *European Journal of Migration and Law*, vol. 26, n. 1, 2024. <https://bura.brunel.ac.uk/bitstream/2438/28151/6/FullText.pdf>

direct or indirect, emerge immediately or develop and consolidate over time.²³

In *root causes* programmes, impacts concern both the funded activities and the role attributed to development cooperation. When these interventions are incorporated into strategies to reduce departures, development objectives tend to coexist with migration objectives, which influence their design, implementation, and evaluation. Over time, this evolution may also alter the behaviour of the actors involved. Local and international organisations are incentivised to adapt their priorities, expertise and language to the opportunities offered by funding, contributing to the gradual emergence of a development cooperation sector increasingly centred on migration.²⁴

In interventions aimed at controlling mobility, the effects on partner countries' economic and social systems can be direct. In many contexts, internal, regional or cross-border mobility is an essential component of household livelihood strategies and the functioning of local economies. Policies primarily aimed at reducing movement can therefore affect access to employment, trade, income diversification, and communities' ability to adapt to changing economic and environmental contexts.²⁵ These impacts affect migrants seeking

to reach Europe, as well as seasonal workers, traders, transport workers, and communities that depend on regional mobility. In Niger, the suppression of activities linked to transit in the Agadez area affected a broader economy than that associated solely with individuals identified as traffickers.²⁶ In Ghana, tighter identification requirements have come into tension with the everyday practices of people who live and work on both sides of the borders.²⁷ The same interventions can restrict freedom of movement and the right to leave one's country, increase exposure to pushbacks, violence and dangerous routes, and strengthen the coercive capacity of repressive state apparatuses towards both migrants and the local population. Human rights are therefore not a separate dimension from development impacts: they affect people's safety, the quality of institutions and the sustainability of interventions.²⁸

A further dimension concerns institutions and the governance of development cooperation. The growing weight attributed to migration objectives can influence relations between donors and partner countries, strengthening the former's ability to shape priorities, instruments and modes of intervention. This process can affect ownership of development policies, the definition of national priorities and the role of local institutions,

²³ Cathrine Talleraas and Ida Marie Savio Vammen, The Rippling Effects of European Migration Governance in Africa: A Critical Research Agenda and Analytical Approach, *International Migration Review*, vol. 60, n. 2, 2026. <https://journals.sagepub.com/doi/10.1177/01979183251359170>; Cathrine Talleraas, The Role of EU Development Cooperation in Addressing Irregular Migration in Africa, European Parliament, Policy Department for External Relations, 2025. [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485)

²⁴ Cathrine Talleraas, The Role of EU Development Cooperation in Addressing Irregular Migration in Africa, European Parliament, Directorate-General for External Policies, 2025. [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485); Cathrine Talleraas, The Politics of Migration Policy Implementation in Ghana, *Governance*, vol. 38, n. 1, 2025. <https://onlinelibrary.wiley.com/doi/10.1111/gove.12848>; Natascha Zaun and Olivia Nantermoz, Depoliticising EU Migration Policies: The EUTF Africa and the Politicisation of Development Aid, *Journal of Ethnic and Migration Studies*, vol. 49, n. 12, 2023. <https://www.tandfonline.com/doi/full/10.1080/1369183X.2023.2193711>

²⁵ Cathrine Talleraas, The Role of EU Development Cooperation in Addressing Irregular Migration in Africa, European Parliament, Directorate-General for External Policies, 2025. [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485); Cristina Udelsmann Rodrigues and Jesper Bjarnesen, Intra-African Migration, European Parliament, Directorate-General for External Policies, PE 603.514, 2020. [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2020\)603514](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2020)603514); Clara Castillejo, Eva Dick and Benjamin Schraven, Supporting or Thwarting? The Influence of European Union Migration Policies on African Free Movement Regimes in West and North-Eastern Africa, *DIE Briefing Paper* n. 18/2019, 2019. <https://www.idos-research.de/briefing-paper/article/supporting-or-thwarting-the-influence-of-eu-migration-policies-on-african-free-movement-regimes-in-west-and-north-eastern-africa/>

²⁶ Morten Bøås, EU Migration Management in the Sahel: Unintended Consequences on the Ground in Niger?, *Third World Quarterly*, vol. 42, n. 1, 2020. <https://www.tandfonline.com/doi/full/10.1080/01436597.2020.1784002>

²⁷ Cathrine Talleraas, The politics of migration policy implementation in Ghana, *Governance*, Vol 38, No 1, 2025. <https://onlinelibrary.wiley.com/doi/10.1111/gove.12848>

²⁸ Cathrine Talleraas, The Role of EU Development Cooperation in Addressing Irregular Migration in Africa, European Parliament, Directorate-General for External Policies, 2025. [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485); Kelsey P. Norman and Nicholas R. Micinski, The European Union's Migration Management Aid: Developing Democracies or Supporting Authoritarianism?, *International Migration*, vol. 61, n. 4, 2023. <https://onlinelibrary.wiley.com/doi/10.1111/imig.13075>; Tineke Strik and Ruben Robbesom, "Compliance or Complicity? An Analysis of the EU-Tunisia Deal in the Context of the Externalisation of Migration Control", *Netherlands International Law Review*, vol. 71, 2024. <https://link.springer.com/article/10.1007/s40802-024-00251-x>

contributing to a progressive overlap among development cooperation, security policies and migration governance.²⁹

Finally, conditionality reinforces these dynamics. In some cases, access to funds, incentives, or programmes is explicitly or implicitly linked to partner governments' willingness to cooperate on border control, returns, and readmission. Even without formally binding conditions, funding criteria and programmes' terms of reference can shape the priorities of governments, institutions, and local organisations, reducing their room for manoeuvre. Externalisation can thus reinforce dependence on external funding, affect administrative capacities and exacerbate negotiating asymmetries in relations with the European Union.³⁰

These consequences are compounded by indirect effects that extend beyond the scope and duration of individual programmes. The literature refers to them as *unintended or rippling effects*: transformations that spread across institutions, economies, territories and social groups and may become entrenched over time. These include the erosion of trust in institutions and humanitarian actors, the legitimisation of authoritarian state apparatuses, the progressive criminalisation of ordinary forms of mobility, and the entrenchment of migration as a cross-cutting priority in public policy. Although more complex and difficult to monitor, these effects help determine the overall impact of externalisation policies on development.³¹

1.5 - ODA Eligibility in Migration Policies: The OECD-DAC Framework

Given the concerns surrounding some aspects of migration programming, and the numerous controversies regarding the use of development assistance in the external dimension of migration, the Organisation for Economic Co-operation and Development (OECD) has developed a range of resources in recent years to provide greater clarity and establish limits on what can and cannot be financed through ODA in the field of migration.

In 2018, **purpose code 15190 – Facilitation of orderly, safe, regular and responsible migration and mobility** was introduced for migration-related activities.³² The description of this code provides that it may be used to assist developing countries in facilitating orderly, safe, regular and responsible migration and mobility through the following activities:

- » Capacity building in migration and mobility policies, including support to facilitate safe and regular migration and address so-called irregular migration, diaspora engagement, and programmes that strengthen the development impact of remittances.
- » Improvement of migrant labour recruitment systems in developing countries.
- » Capacity building for strategy and policy development as well as legal and judicial development, including border management. This includes support to address and reduce migration-related vulnerabilities, strengthening

²⁹ Cathrine Talleraas, The Role of EU Development Cooperation in Addressing Irregular Migration in Africa, European Parliament, Directorate-General for External Policies, 2025. [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485); Mehari Taddele Maru, Migration Policy-Making in Africa: Determinants and Implications for Cooperation with Europe, EUI RSC 2021/54, Migration Policy Centre, 2021. <https://cadmus.eui.eu/entities/publication/f271b0e1-1e34-5891-9774-d02b2c9910e8>; Marieke Mouthaan, "Unpacking Domestic Preferences in the Policy-'Receiving' State: The EU's Migration Cooperation with Senegal and Ghana, Comparative Migration Studies, vol. 7, n. 35, 2019. https://www.researchgate.net/publication/335403410_Unpacking_domestic_preferences_in_the_policy-'receiving'_state_the_EU's_migration_cooperation_with_Senegal_and_Ghana

³⁰ Cathrine Talleraas, The Role of EU Development Cooperation in Addressing Irregular Migration in Africa, European Parliament, Directorate-General for External Policies, 2025. [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485); E. McGregor et al., Conditionality, Compensation, or Both? Comparative Experiences of Third-Country Cooperation on Migration with the EU, Journal of Immigrant & Refugee Studies, vol. 23, n. 1, 2025. <https://www.tandfonline.com/doi/full/10.1080/15562948.2024.2431067>

³¹ Cathrine Talleraas and Ida Marie Savio Vammen, The Rippling Effects of European Migration Governance in Africa: A Critical Research Agenda and Analytical Approach, International Migration Review, vol. 60, n. 2, 2026. <https://journals.sagepub.com/doi/10.1177/01979183251359170>; Marieke Boersma et al., Learning in Migration Management? Persistent Side Effects of the EUTF, International Migration, vol. 60, n. 6, 2022. <https://pure.eur.nl/en/publications/learning-in-migration-management-persistent-side-effects-of-the-e/>

³² DAC Working Party on Development Finance Statistics, Update to the Review of the Activities Reported under Purpose Code 15190 on the Facilitation of Orderly, Safe, Regular and Responsible Migration and Mobility, OECD, 2025. [https://one.oecd.org/document/DCD/DAC/STAT\(2025\)9/FINAL/en/pdf](https://one.oecd.org/document/DCD/DAC/STAT(2025)9/FINAL/en/pdf)

the transnational response to migrant smuggling and preventing and combating trafficking in human beings.

- » Support for strategies to ensure international protection and the right to asylum.
- » Support for strategies to ensure access to justice and assistance for displaced persons.
- » Assistance to migrants for their safe, dignified, informed and voluntary return to their country of origin (exclusively for returns from another developing country and excluding assistance for forced returns).
- » Assistance to migrants for their sustainable reintegration in their country of origin.

The code's description further clarifies that activities that primarily serve the interests of donor countries are excluded from ODA. In addition, interventions aimed at addressing the root causes of migration and forced displacement should not be reported under code 15190, but under the codes corresponding to the specific sector of intervention.

In 2022, the DAC Committee adopted guidelines³³ clarifying the eligibility of migration-related actions under ODA rules, to safeguard the integrity of ODA while recognising that, in the field of migration, it can be difficult to distinguish between programmes responding to the development needs and priorities of third countries and those serving the political priorities and interests of donor countries. The guidelines define six principles and eight criteria (Annex 1).

When reporting projects to the OECD, members were encouraged to apply the 2023 guidelines by 2024. **In 2025, the OECD subsequently adopted a casebook on migration-related activities, providing examples of activities that are eligible as ODA and those that are not, and conducted a new review of activities reported under code 15190 in light of the adopted guidelines.** The resulting recommendations emphasise that members should pay attention

to accurately applying the guidelines, improve project descriptions to facilitate assessment of their alignment with ODA principles, distinguish between the reporting rules for migration-related activities and those governing in-donor refugee costs, and provide more detailed descriptions of labour mobility activities involving movement to a country that is not eligible to receive ODA.

On conditionality, the OECD stresses that members should improve project descriptions to clarify the characteristics of their assistance when funds are subject to specific migration-related conditions, including demonstrating that the conditions imposed primarily contribute to promoting the economic development and welfare of developing countries. The OECD recognises a difficulty in this area, as conditionality is rarely made explicit in project descriptions and is more often embedded in a broader policy approach. Nevertheless, the guidelines make clear that members must clarify whether an intervention is linked to migration-related conditionality and adapt their reporting accordingly.

Regarding border management activities, the review emphasises that establishing the primary objective of such interventions is fundamental to determining whether they are aligned with development principles. However, this is not always easy to establish when project descriptions are brief or vague. This is the area in which the eligibility of interventions has been most frequently challenged, and the OECD stresses the need to be as specific as possible about the activity's primary objective and the components included and excluded.

1.6 - Analytical Framework

The report analyses EU and Italian migration cooperation programmes financed, since 2020, with resources recorded as Official Development Assistance. The analysis examines interventions supporting the external dimension of migration

³³ DAC Working Party on Development Finance Statistics, Update to the Review of the Activities Reported under Purpose Code 15190 on the Facilitation of Orderly, Safe, Regular and Responsible Migration and Mobility, OECD, 2025. <https://www.oecd.org/en/topics/sub-issues/oda-eligibility-and-conditions/migration-related-activities-in-oda.html>

policies across the main programming areas – border management, return and reintegration, protection, and *root causes* – to assess their financial scale, geographical distribution, intervention priorities, and the rationales underpinning their use.

The first part of the report provides a quantitative analysis of allocated budgets, distinguishing between intervention types, their geographical distribution, and their evolution over time. This makes it possible to identify which sectors absorb the largest share of resources and what balance emerges between interventions more directly oriented towards migration control and those linked to protection and development objectives.

The second part of the report provides an in-depth analysis of a sample of programmes and projects. By examining their objectives, theories of change, planned activities, beneficiaries, and geographical selection criteria, the report assesses the extent to which interventions in the different categories can be linked to development objectives or are instead oriented, to varying degrees, towards broader objectives of migration management, the prevention of departures, and the containment of mobility.

This makes it possible to identify both concerns about compliance with OECD-DAC criteria and cases of substantive aid diversion that arise even when expenditure is formally eligible as ODA. The main areas of concern include border management, return and reintegration, and, to some extent, protection programmes. Similar risks may arise in awareness-raising and *root causes* programmes when the selection of countries or regions, beneficiaries, activities, or indicators is primarily driven by the objective of reducing departures rather than by the development priorities of partner countries.

A second reference framework is Policy Coherence for Development (PCD), which situates the analysis of ODA allocated to migration within the broader relationship between development cooperation, migration policy, and EU external action. OECD-DAC criteria enable assessment of whether an intervention is eligible for ODA and whether development is its primary objective. **PCD, by contrast, highlights the tensions that arise when objectives of control, deterrence, and externalisation influence cooperation priorities and, more broadly, European external action.** From this perspective, the analysis also considers how individual programmes fit within broader strategies in which donors' migration objectives may shape their design and implementation. This can create tensions around partner-country ownership, the protection of rights, and the EU's commitments to sustainable development.³⁴

Conditionality is relevant to both analytical frameworks and has become increasingly important over time. When access to funding is linked to cooperation on border control, returns, or readmission, it raises questions about the primary objective of development cooperation: supporting partner countries' development and well-being or advancing the donor's migration priorities. Conditionality can be explicit, through formal requirements attached to funding disbursements, but it can also operate indirectly. Financial incentives, reward mechanisms, predefined priorities, or pressure to align programmes and policies with donor objectives can have similar effects. In both cases, this raises concerns about the classification of expenditure as ODA and about policy coherence. Funding may be redirected away from priority development needs, partner countries' policy space may be narrowed, and existing power imbalances between donors and partner countries may be reinforced.³⁵

³⁴ Art. 208 of the Treaty of Functioning of the European Union. <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:12012E/TXT:en:PDF>; European Commission, 2019 EU Report on Policy Coherence for Development, SWD(2019) 20 final, 2019. https://international-partnerships.ec.europa.eu/system/files/2019-09/swd-2019-20-pcdreport_en.pdf; Cathrine Talleraas, The Role of EU Development Cooperation in Addressing Irregular Migration in Africa, European Parliament, 2025. [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485)

³⁵ Cathrine Talleraas, The Role of EU Development Cooperation in Addressing Irregular Migration in Africa, European Parliament, Directorate-General for External Policies, 2025. [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485); Kelsey P. Norman and Nicholas R. Micinski, "The European Union's Migration Management Aid: Developing Democracies or Supporting Authoritarianism?", *International Migration*, vol. 61, n. 4, 2023. <https://onlinelibrary.wiley.com/doi/10.1111/imig.13075>; Tineke Strik and Ruben Robbesom,

2 - EUROPEAN AND ITALIAN FUNDING INSTRUMENTS: AN OVERVIEW

The following section provides an overview of the funding instruments used at the European and Italian levels to finance actions in the external dimension of migration. At the European level, the **Neighbourhood, Development and International Cooperation – Global Europe (NDICI-GE)** is the main instrument for examining EU funds allocated to the external dimension of migration, as it is the main budget instrument for the EU's external action and development cooperation in the current budget cycle. However, it is not the only one. Mapping the totality of EU funding going to migration programmes in third countries is an extremely complex exercise that would imply tracking several funding streams that can either involve other EU funds like the Asylum, Migration and Integration Fund (AMIF) or the Border Management and Visa Instrument (BVMF), which – although meant as home affairs instruments – can fund certain actions in third countries,³⁶ or merge funds from the EU and Member States, either through co-financing or through individual projects that contribute to the same objectives under a Team Europe approach.³⁷ Accordingly, this study will not aim to present a comprehensive picture of all instruments used to finance the external dimension of migration, but will focus solely on NDICI-GE as the main instrument. Also, because NDICI-GE is primarily a development cooperation instrument, most of its actions are considered ODA and assigned relevant DAC codes according to their area of focus, as well as a percentage of *dacability*.

At the Italian level, several funding instruments support migration-related activities in the external dimension. The Ministry of Foreign Affairs and International Cooperation manages two: the Africa Fund, later renamed the **Migration Fund**, and the **Incentive Fund for Return Policies**. The Mission Decree authorises and funds Italian bilateral support to the Libyan border control authorities. The Ministry of Economy and Finance budget funds part of the activities, particularly technical and logistical assistance and the maintenance of naval vessels. These instruments are presented in the relevant budget documents as eligible, in whole or in part, for reporting as Official Development Assistance.

2.1 - NDICI Global Europe

NDICI-GE covers the EU external action and development cooperation in the current Multiannual Financial Framework (MFF) running from 2021 to 2027. NDICI-GE has a total budget of €79 billion and is part of Heading 6 of the MFF, which relates to the EU's external action in the Neighbourhood and the World.

Being the main instrument for the EU's external action and development cooperation, NDICI-GE has a target of at least 93% of the funding that must fulfil the ODA criteria as established by the DAC committees in the OECD, meaning that at least 93% of its actions should promote

³⁶ "Compliance or Complicity? An Analysis of the EU–Tunisia Deal in the Context of the Externalisation of Migration Control", Netherlands International Law Review, vol. 71, 2024, pp. 199–225. <https://link.springer.com/article/10.1007/s40802-024-00251-x>

³⁷ Catherine Woollard, Josephine Liebl, Laura Davis, Elena Casajuana, EU migration and asylum funds for third countries, European Parliament, 2022. [https://www.europarl.europa.eu/RegData/etudes/STUD/2022/737870/IPOL_STU\(2022\)737870_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2022/737870/IPOL_STU(2022)737870_EN.pdf)

³⁸ The Team Europe approach was initially launched during the Covid-19 pandemic to ensure a coordinated response between the EU and Member States. It has then expanded to other areas of intervention, including the EU external action where the objective is for the EU, its Member States - including their implementing agencies and public development banks - as well as the European Investment Bank and the European Bank for Reconstruction and Development to work together and pool resources and expertise. https://international-partnerships.ec.europa.eu/policies/team-europe-initiatives_en

and specifically target the economic development and welfare of developing countries.³⁸

The structure of NDICI-GE is divided into four geographic programmes (Neighbourhood; Sub-Saharan Africa; Asia and the Pacific; Americas and the Caribbean), four thematic programmes (Human Rights and Democracy; Civil Society Organisations; Peace, Stability and Conflict Prevention; Global Challenges) and rapid

response actions. In addition, a cushion for emerging challenges and priorities can be used to allocate extra funding to any of the three pillars in the event of unforeseen emergencies or needs. Most NDICI-GE programming goes through the geographic programmes, with thematic programmes complementary to the geographic ones, and rapid response actions complementary to the other two.

FIGURE 1. Financial architecture of NDICI–Global Europe (2021–2027)

GEOGRAPHIC PILLAR €60.38 billion	THEMATIC PILLAR €6.36 billion	RAPID RESPONSE €3.18 billion
Neighbourhood At least €19.32 billion	Human Rights and Democracy €1.36 billion	Crisis response and conflict prevention
Sub-Saharan Africa At least €29.18 billion	Civil Society Organisations €1.36 billion	Resilience and linking humanitarian and development actions
Asia and the Pacific €8.48 billion	Peace, Stability and Conflict Prevention €0.91 billion	Foreign policy needs and priorities
Americas and the Caribbean €3.39 billion	Global Challenges €2.73 billion	
EMERGENCY CHALLENGES AND PRIORITIES CUSHION €9.53 billion		

Source: authors' elaboration

When it comes to migration and forced displacement,³⁹ NDICI-GE introduces several novelties. First, Article 3 references migration and

forced displacement and lists the Instruments' objectives. Article 3(1)⁴⁰ defines NDICI-GE's objectives as upholding and promoting the

³⁸ Regulation (EU) 2021/947 of the European Parliament and of the Council of 14 June 2021 establishing the Neighbourhood, Development and International Cooperation Instrument – Global Europe [2021] OJ 2 209/01. <https://eur-lex.europa.eu/eli/reg/2021/947/oj/eng>

³⁹ The European Commission's work on human mobility is divided into two policy areas: migration and forced displacement. Migration refers to the movement of people within or across borders, and the work translates into several intervention areas including tackling the root causes of irregular migration, anti-trafficking and counter-smuggling, border management, return and reintegration, legal migration and mobility, diaspora and remittances. Forced displacement refers to an involuntary or coerced movement, due to persecution, conflict, generalised violence, human rights violations or the adverse effects of climate change, environmental degradation, or disasters. Intervention areas on this field relate to assistance to refugees, IDPs and asylum seekers, climate-induced displacement, protection and service provision. https://international-partnerships.ec.europa.eu/policies/migration-and-forced-displacement_en

⁴⁰ Regulation (EU) 2021/947 of the European Parliament and of the Council of 14 June 2021 establishing the Neighbourhood, Development and International Cooperation Instrument – Global Europe [2021] OJ 2 209/01. <https://eur-lex.europa.eu/eli/reg/2021/947/oj/eng>

Union's values, principles and fundamental interests worldwide, its foundations in Article 3(5), 8 and 21 of the Treaty on European Union, thus contributing to the reduction and, in the long term, the eradication of poverty, the promotion of democracy, rule of law and respect for human rights, sustainable development as well as the Instrument's role in the fight against climate change and "*addressing irregular migration and forced displacement, including their root causes*". Article 3(2), which defines NDICI-GE specific objectives, lists migration, mobility, and forced displacement both among the global challenges and the rapid responses to crises that the Instrument can address. Therefore, migration-related actions can draw funding from geographic or thematic programmes, rapid response actions, and the emerging challenges and priorities cushion.

Recitals 50 and 51 and Article 8(10) clarify the types of migration and forced displacement interventions that will be supported and introduce two key elements: a spending target for migration and forced displacement and the so-called *flexible incitative approach*, a form of incentives-based conditionality through which extra funding can be allocated to countries to boost cooperation on migration (see chapter 4.3).

Firstly, when it comes to the types of interventions, cooperation under the Instrument should contribute to the following aims:

1. Ensuring access to international protection
2. Addressing the root causes of irregular migration and forced displacement
3. Enhancing border management and pursuing efforts to prevent irregular migration and forced displacement
4. Fighting against trafficking in human beings and migrant smuggling
5. Working on dignified and sustainable returns, readmission and reintegration
6. Engaging with diasporas

7. Supporting legal migration pathways

Then, Recital 51 introduces a spending target of indicatively 10% for actions supporting the management and governance of migration and forced displacement. The target should also include actions that address the root causes of irregular migration and forced displacement if they directly target specific challenges related to migration and forced displacement. To determine which actions to count toward the 10% target, the Commission has introduced a migration marker to classify each activity based on its overall contribution to the target. An activity can be marked as 2 (migration is the primary focus, and 100% of the action is counted as contributing to the target); 1 (migration is a significant focus and 40% of the action is counted as contributing to the target); 0 (migration is not the focus, so 0% of the action is counted as contributing to the target).⁴¹

NDICI-GE programming is based on multiannual indicative programmes (MIPs) that set out the priority areas, objectives, expected results, and indicative financial allocations for EU support in specific countries, regions, or themes.⁴² The Commission then drafts Annual or Multi-Annual Action Plans to guide the implementation of MIPs, which are adopted through Commission Implementing Decisions that detail the financing of action plans and programmes. Action Documents come as Annexes to these Implementing Decisions and constitute the most detailed documentation publicly available that explains: the rationale of the actions, the context and problem analysis, lessons learned, expected objectives, outputs and indicative activities, risk analysis and intervention logic, type of management (direct, indirect, shared) as well as technical information like DAC codes and contribution to SDGs. For this reason, they constitute the primary data source for this analysis (see Annex 3 for a complete overview of the Action Documents analysed).

⁴¹ Catherine Woollard, Josephine Liebl, Laura Davis, Elena Casajuana, EU migration and asylum funds for third countries, European Parliament, 2022. [https://www.europarl.europa.eu/RegData/etudes/STUD/2022/737870/IPOL_STU\(2022\)737870_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2022/737870/IPOL_STU(2022)737870_EN.pdf)

⁴² See NDICI Regulation, Articles 14-25. <https://eur-lex.europa.eu/eli/reg/2021/947/oj/eng>

2.2 - Migration Fund – Italian Ministry of Foreign Affairs and International Cooperation (MAECI)

The Migration Fund is one of Italy's main bilateral instruments for financing the external dimension of migration. It was initially established as the Africa Fund in 2017, amid intense political pressure on migration and the signing of the heavily criticised Memorandum of Understanding (MoU) with Libya⁴³. The fund's stated objective is to *"revive dialogue and cooperation with African countries of priority importance for migration routes"*.⁴⁴ From its inception, the Fund had a dual purpose: on the one hand, it fits within the broader framework of development cooperation; on the other, it responds to the logic of managing and containing migration flows. The latter dimension is made explicit in the 2017 document, where the allocated resources were considered part of the *"measures established by the Italian Government aimed at combating irregular immigration and human trafficking"*.⁴⁵

The new Migration Fund, which replaced the Africa Fund in 2019, considerably broadened its geographical scope. No longer limited to African countries, the Fund was extended to all *"countries of origin, transit and destination of migratory flows of priority interest to Italy"*,⁴⁶ while also placing greater emphasis on its role in supporting broader migration management. Sectoral priorities included programmes assisting refugees, migrants, displaced persons and host communities; technical assistance to local authorities; assisted voluntary return; development initiatives targeting host communities and

migrants' communities of origin; and information campaigns. Unlike the Africa Fund, however, the new policy framework does not explicitly include border management and control among the priority areas of intervention, although some projects in this area have nevertheless been funded (Chapter 3). Migration management objectives remain, but are framed more broadly, with reference to migration governance and cooperation with countries of origin and transit.

This shift is also evident in the progressively reduced role of the Italian Agency for Development Cooperation (AICS) in implementing projects financed by the Migration Fund. Nowadays, the Fund increasingly relies on direct management by the Ministry and on international organisations with an established presence in countries of origin and transit, specialised expertise and the capacity to operate across different stages of migration routes. This choice reflects an implementation model built around flexibility, rapid mobilisation, and the pursuit of specific migration policy objectives. It allows resources to be redirected in response to changing routes, diplomatic priorities and operational needs, while favouring project-based interventions over longer-term programming.

When resources are allocated to the Migration Fund through the annual Budget Law, the full amount is provisionally classified as ODA-eligible. This initial classification is then subject to reporting and verification through the OECD-DAC system. As shown in Table 1, the amounts notified between 2020 and 2024 were ultimately recognised in full as ODA, confirming a consistent pattern of 100% eligibility.

⁴³ Anne Palm, The Italy-Libya Memorandum of Understanding: The baseline of a policy approach aimed at closing all doors to Europe? EU Immigration and Asylum Law and Policy Blog, 2017.

⁴⁴ MAECI, Ministerial Decree of 1 February 2017 laying down the guidelines for the use of the Africa Fund, 2017. https://www.esteri.it/mae/resource/doc/2017/02/decreto_africa_0.pdf

⁴⁵ Ibidem.

⁴⁶ MAECI, Ministerial Decree of 6 March 2020 laying down the guidelines for the use of the Migration Fund, 2020. https://www.esteri.it/mae/resource/doc/2020/05/dm_4115_616_fondo_migrazioni_2020.pdf

TABLE 1. Migration Fund ODA eligibility

Year of notification	Allocation of resources notified by DGIT to DGCS and subsequently to the OECD (millions of euros)	% of ODA recognised by the OECD of the notified amount
2020	30,00	100%
2021	52,49	100%
2022	87,50	100%
2023	23,00	100%
2024	28,00	100%
2025	28,50	Not available ⁴⁷

Source: FOI request, DGIT, July 2026

It is also worth noting that, procedurally, the Fund operates through a system of direct entrustment to international organisations and other implementing bodies⁴⁸ selected by the Directorate-General for Italians Abroad and Migration Policies (DGIT) of the Ministry of Foreign Affairs and International Cooperation based on the consistency of project proposals with the objectives of the annual programme and the government's policy priorities. While the Italian procurement law provides a clear framework for tender procedures, these can be avoided when selecting international organisations as implementing bodies. In this case, the absence of codified, transparent selection procedures leaves ample scope for administrative discretion in selecting those implementing bodies. This can also increase the risk that implementing bodies are more inclined to toe the Italian government's political line to secure funding.

2.3 - Incentive Fund for Return Policies – Italian Ministry of Foreign Affairs and International Cooperation (MAECI)

The Incentive Fund for Return Policies (hereinafter, the Incentive Fund) was established in 2019 by the Security Decree Bis.⁴⁹ Its purpose is to encourage cooperation from third countries with which Italy or the EU have concluded readmission agreements or arrangements “*in the area of the readmission of irregular migrants present on national territory*”.⁵⁰ Unlike the Migration Fund, the Incentive Fund is explicitly designed as a conditionality instrument. The resources are allocated to countries that actively cooperate with Italy on repatriation and readmission and may also be used to encourage the conclusion of new bilateral agreements for this purpose.

The Fund's initial allocation was set at €2 million for 2019, with the possibility of an annual

⁴⁷ Regarding the data for the year 2025, it has been stated that it is not currently possible to specify the percentage recognised as ODA by the OECD-DAC, as the data cycle had not yet been finalised at the time of the request.

⁴⁸ The award procedure was not made public but was only obtained following a general request for access to information. The procedure involves identifying implementing bodies, inviting them to submit project proposals, evaluating the proposals received, and signing the documents. All of this takes place without a tender process and without the formalities required by Italian law, as the majority of the organisations involved are international bodies.

⁴⁹ Italy, Decree-Law No. 53 of 14 June 2019, Urgent Provisions on Public Order and Security, converted, with amendments, into Law No. 77 of 8 August 2019.

⁵⁰ MAECI. Ministerial Directive of 24 December 2019 laying down the general guidelines for the use of the Incentive Fund for Return Policy, Rome, 24 December 2019.

increase coming from savings generated by the reception system⁵¹ thereby establishing a direct link between the reduction in expenditure on domestic reception and the financing of migration cooperation with countries of origin and transit. Although the structure of the Fund remains unchanged, from 2022 onwards the resources are allocated directly in the Budget Law, with an estimated expenditure of around €10 million per year, provisionally classified as 100% ODA-eligible.

allocated through the Incentive Fund were ultimately recognised as ODA by the OECD-DAC. This is hardly surprising given the nature of the instrument. As discussed in Chapter 4.1, a substantial proportion of the non-eligible expenditure relates to the project *Support to Tunisia's Border Control and Management of Migration Flows*, indicating that a significant share of the Fund has financed activities directly supporting border management and migration control rather than pursuing development objectives.

As shown in Table 2, only 57.8% of the resources

TABLE 2. Incentive Fund ODA eligibility

Year of notification	Allocation of resources notified by DGIT to DGCS and subsequently to the OECD (millions of euros)	% of ODA recognised by the OECD of the notified amount
2020	-	0%
2021	-	0%
2022	30,00	60%
2023	10,00	30%
2024	5,00	100%
2025	7,50	Not available ⁵²

Source: FOI request, DGIT, July 2026

Projects financed through this fund may be implemented in the following areas: institutional support and capacity-building in recipient countries, including border management and the fight against trafficking; protection of refugees and vulnerable migrants; assisted voluntary returns; and the reintegration of readmitted persons into their countries of origin. The geographical scope is limited to countries with which Italy or the EU has concluded readmission agreements, or intends to do so.

The Incentive Fund primarily serves as a 'positive' conditionality instrument, using financial incentives to encourage and reward third countries' cooperation on readmission and return policies. However, it has also been used flexibly to cover funding requirements for measures that became necessary in the wake of the Russia-Ukraine conflict. From 2022 onwards, resources also financed projects in countries such as Moldova to address the migration-related consequences of the war in Ukraine.

⁵¹ The Italian reception system for asylum seekers and beneficiaries of international protection is a multi-tiered framework designed to provide housing, healthcare, and social assistance. It is structured into emergency phases, first-level government hubs, and a decentralized, long-term integration network focused on recognized protection beneficiaries and vulnerable asylum seekers. European Council on Refugees and Exiles (ECRE), Asylum Information Database (AIDA): Country Report – Italy, section "Short overview of the reception system", available at: <https://asylumineurope.org/reports/country/italy/reception-conditions/short-overview-reception-system/>

⁵² Regarding the data for the year 2025, it has been stated that it is not currently possible to specify the percentage recognised as ODA by the OECD-DAC, as the data cycle had not yet been finalised at the time of the request.

Although these interventions were not directly linked to readmissions, they illustrate the Fund's flexibility. Rather than being confined to a specific geographical area or a narrow set of activities, the Fund can support third countries in managing migration flows arising from humanitarian crises and emergencies.

The management procedures are similar to those of the Migration Fund. The MAECI may implement projects either directly or through implementing bodies selected among Italian public administrations, EU institutions or international organisations. In this case too, the procedure involves direct awards, with the DGIT signing technical agreements with the implementing bodies without any public selection process.

The parallel existence of the Incentive Fund and the Migration Fund (two instruments managed by the same ministry through the same administrative structures, with largely overlapping intervention types) also raises a question of institutional rationality that the regulatory framework does not address. Formal differences do exist: the Incentive Fund operates on direct incentives linked to returns, while the Migration Fund operates across a range of recipient countries. However, in practice, the operational distinction between the two instruments is blurred, and there is no clear institutional justification for their coexistence rather than integrating them into a single programming instrument.

2.4 - Chapter 2371 – Italian Ministry of Interior (MOI)

Italian development cooperation is implemented not only through the MAECI and AICS. Law 125/2014 defines a broad system involving several ministries and public administrations. MAECI provides political direction and overall coordination, while AICS has a technical and operational role. In practice, however, coordination is often weak, and individual ministries may act according to their own mandates and policy priorities.

Within this context, particular attention should be paid to one funding stream managed by the Ministry of the Interior: Chapter 2371 of the Ministry's budget, which finances international partnerships, cooperation, and assistance to third countries in the fields of migration and asylum. This funding stream is financed directly by the €250 administrative fee levied on all applications for Italian citizenship under the 1992 Citizenship Act, with the proceeds directly paid into the Fund. Revenue from citizenship application fees is therefore used each year to finance international partnerships, cooperation, and assistance to third countries in the fields of migration and asylum, including through Italy's participation in European programmes. At the same time, it covers the costs of administrative procedures falling within the remit of the Department for Civil Liberties and Immigration, including preliminary investigations related to migration, asylum, and citizenship proceedings, as well as extraordinary welfare measures. Chapter 2371 thus constitutes a hybrid funding mechanism, combining expenditure on international cooperation with a wide range of domestic administrative and welfare-related activities. Since 2015, coinciding with the so-called refugee crisis, annual allocations have increased from only a few tens of thousands of euros to approximately €9 million, a level that has remained broadly stable over the past decade.

TABLE 3. Chapter 2371 – Annual appropriations (2014–2026)

Year	Funding (€)
2014	€55,805.00
2015	€9,020,624.00
2016	€9,020,624.00
2017	€9,020,564.00
2018	€8,927,870.00
2019	€8,932,633.00
2020	€8,932,633.00
2021	€8,932,633.00
2022	€8,932,633.00
2023	€8,932,633.00
2024	€8,574,183.00
2025	€23,886,002.00
2026	€8,462,252.00

Source: compiled from data from the Italian Ministry of Economy and Finance. 2015–2026. Decree allocating parliamentary voting units into budget chapters relating to the State's budget forecast (annual editions).

One of the main ways resources under Chapter 2371 have been allocated is through RELINT calls for proposals. So far, two calls have been launched: RELINT2019 and RELINT2024. The selection procedures were open to national and international NGOs, international organisations, and local authorities to implement development cooperation projects in countries of origin and transit along migration routes to Europe. Eligible activities included interventions that address the root causes of migration, protect refugees, strengthen child protection systems, and raise awareness of the risks of so-called irregular migration.

During the period 2020–2025, the resources allocated to this chapter were used in a wide variety of ways, from the administrative management of regional development and protection programmes to direct contributions to the International Organisation for Migration (IOM) for information campaigns and for monitoring of the Italy–Albania Protocol, to the co-financing of European programmes.

The RELINT2019 and RELINT2024 calls finance activities that largely fall within development cooperation, including vocational training, local economic development, child protection, and support for vulnerable migrants and refugees. While both calls are managed under Chapter 2371 of the Ministry of the Interior and fall within the broader Italian cooperation framework, MAECI and AICS's role remains limited: AICS provided technical support for the evaluation of RELINT2019 but not for RELINT2024. This raises concerns about overall coordination and alignment, given that some development-oriented projects are funded and managed outside the ordinary MAECI–AICS framework, which may weaken strategic coherence and make it harder to ensure consistent technical standards, monitoring, and links to country-level cooperation priorities.

2.5 - The Mission Decree – Italian Ministry of Economy and Finance

A last funding stream that deserves attention is the so-called Mission Decree. Italy's participation in international missions is authorised each year by the Council of Ministers and subsequently approved by the Parliament in the so-called International Mission Decree. This Decree is particularly relevant because, for the past decade, it has consistently financed the bilateral mission that assists the so-called Libyan Coast Guard (Table 4).⁵³ Established in 2017, the bilateral assistance mission to the Libyan authorities provides the legal and operational framework

⁵³ At present, it is not possible to determine whether, and to what extent, the bilateral assistance mission to the Libyan authorities can be classified as ODA. The level of detail provided in the mission document does not allow for an analysis based on the OECD-DAC codes. We have therefore submitted a FOI request to the Ministry of Defence and the Ministry of Economy and Finance in order to obtain specific information on any portion of the mission that may be dacable. However, as of the time of finalising this report, we have received no response. It is conceivable, although this cannot be confirmed in the absence of official data, that a small share of the resources allocated to this mission could be classified as ODA, particularly under code 15210 - *Security system management and reform*.

for Italy's support to Libya's border management institutions through technical assistance, training, equipment, and logistical support. The mission is authorised annually under the International Missions Decree. It operates at the request of the Libyan authorities, within the broader framework of the 2017 Italy–Libya MoU and the relevant UN Security Council resolutions. Over time, the activities have included technical advice, training, logistical support, maintenance of naval assets, the supply of equipment and spare parts, and assistance in restoring and strengthening the operational capabilities of the so-called Libyan Coast Guard and other maritime institutions. More recent mission mandates also emphasise support for the Libyan authorities' autonomous management of maintenance procedures and technical systems.

TABLE 4. Bilateral Mission to Assist the Libyan Institutions Responsible for Maritime Border Control

Year	Resource (Million €)
2017	€3,567,173.00
2018	€1,605,544.00
2019	€1,605,544.00
2020	€10,050,160.00
2021	€10,479,140.00
2022	€10,479,140.00
2023	€10,778,926.00
2024	€12,963,520.00
2025	€11,010,797.00
2026	€11,092,824.00
TOT	€83,632,768.00

Source: Author's elaboration based on the annual Government Deliberations on the Authorisation and Renewal of International Missions (Doc. XXV, 2017–2026) and the accompanying Analytical Reports (Doc. XXVI, 2017–2026).

Alongside longstanding support for Libyan maritime authorities, the 2026 Mission Decree introduces a new bilateral mission in Tunisia involving personnel from the Italian Financial Police (*Guardia di Finanza*). The mission is intended to provide advice, technical and logistical assistance, and training to Tunisia's *Garde Nationale Maritime*. Its activities include establishing a support unit in Tunis and Sfax, maintaining naval vessels transferred by Italy – including through EU-funded programmes – and training Tunisian crews. The planned deployment comprises up to 22 personnel and associated logistical equipment. The mission is grounded in the 2017 declaration of intent on migration cooperation between Italy and several European and Mediterranean partners, as well as subsequent diplomatic exchanges between Italy and Tunisia. Its total programmed cost amounts to approximately €8.8 million, of which €6.1 million is expected to fall due in 2026 and €2.7 million in 2027. Like the assistance provided to Libya, the initiative reflects Italy's growing use of international mission funding to strengthen partner countries' maritime border-control capacities in the central Mediterranean.⁵⁴

Lastly, the Missions Decree provides resources for development cooperation initiatives that support peace and stabilisation processes. These allocations constitute a distinct development cooperation component of the instrument, managed through the MAECI budget. In 2025, €243 million were allocated to development cooperation initiatives and a further €8 million to humanitarian demining, while a small component included several interventions addressing migration and return. In response to a freedom of information (FOI) request submitted by ActionAid, MAECI confirmed that these resources are reported to the OECD for recognition as ODA. The list of 74 funded interventions, amounting to €224.9 million, shows that the portfolio is predominantly humanitarian. However, a closer look at the individual initiatives shows that a smaller share of the funding is directed toward migration-related activities. More than €9.6 million

⁵⁴ Italian Government, Deliberazione del Consiglio dei ministri in merito alla partecipazione dell'Italia ulteriori missioni internazionali per l'anno 2026 (Doc. XXV, n. 4). Senate of the Republic and Chamber of Deputies, 2026. <https://www.senato.it/leggi-e-documenti/attivita-non-legislative/documenti-non-legislativi?documentoid=53817>

is allocated to the L.A.I.T. project, implemented by the Ministry of the Interior and IOM, to develop mechanisms for assisted voluntary return and reintegration, and for voluntary humanitarian return, in Africa. Several UNHCR interventions in Syria and Iraq also include activities related to the return of refugees and internally displaced persons. Therefore, the development cooperation component of the Missions Decree also serves, to a limited extent, as a channel for financing migration and return-related initiatives.

2.6 - Human Rights Due Diligence

Both at the European and Italian levels, funds used in the external dimension of migration have repeatedly come under scrutiny for their complicity in human rights violations in third countries. North African countries like Libya and Tunisia are clear examples: they are primary recipients of external migration funds because of their crucial role in border management and geographic position along the Central Mediterranean route, but they are also stages of systemic human rights violations against people on the move and the local population.

In Libya, the evidence of human rights violations against migrants and refugees is alarming. In its final report published in 2023, the UN Independent Fact-Finding Mission on Libya found that there are reasonable grounds to believe that since 2016,

crimes against humanity have been committed against Libyans and migrants throughout Libya.⁵⁵ These findings are echoed by several other data, coming from OHCHR and other UN bodies,⁵⁶ international organisations and CSOs,⁵⁷ media investigations⁵⁸ – all of which point to a pattern of abuses linked to detention, exploitation, torture and other degrading treatments, forced interceptions and pull-backs, sexual and gender-based violence. Similar violations have also been reported in Tunisia. A case in point is the year 2023, when the EU signed its MoU with the Tunisian government, in the middle of a democratic crackdown and authoritarian drift in the country, and collective expulsions to Libya targeting black people, including children and pregnant women.⁵⁹

Due Diligence in the EU's External Dimension of Migration

In light of this, the question of human rights due diligence of funds used in third countries, especially to support border management authorities, has become increasingly urgent. At EU level, this culminated in the Special Report 17/2024⁶⁰ report by the European Court of Auditors on the EUTF, which presents findings that are relevant for NDICI-GE as well. The report contains specific recommendations for the European Commission on how to strengthen human rights due diligence

⁵⁵ UN Independent Fact-Finding Mission on Libya, Report of the independent Fact-Finding mission on Libya. In UN Human Rights Council (A/HRC/52/83). UN Human Rights Council, 2023. <https://www.ohchr.org/en/hr-bodies/hrc/libya/index>

⁵⁶ OHCHR and UNSMIL, Business as Usual: Human Rights Violations and Abuses against Migrants, Asylum-Seekers, and Refugees in Libya, 2026 <https://www.ohchr.org/en/documents/reports/business-usual-human-rights-violations-and-abuses-against-migrants-asylum-seekers>; UN Independent Fact-Finding Mission on Libya, Report of the independent Fact-Finding mission on Libya. In UN Human Rights Council (A/HRC/52/83). UN Human Rights Council, 2023. <https://www.ohchr.org/en/hr-bodies/hrc/libya/index>

⁵⁷ Amnesty International, Libya/EU: Rival authorities intensify xenophobic and racist crackdown on refugees and migrants in Libya as EU seeks to deepen ties, 2026, June 23. <https://www.amnesty.org/en/latest/news/2026/06/libya-eu-rival-authorities-intensify-xenophobic-and-racist-crackdown-on-refugees-and-migrants-in-libya-as-eu-seeks-to-deepen-ties/>; Human Rights Watch, No Escape from Hell. 2023. In *Human Rights Watch*. <https://www.hrw.org/report/2019/01/21/no-escape-hell/eu-policies-contribute-abuse-migrants-libya>; Amnesty International. Libya: 'No one will look for you': Forcibly returned from sea to abusive detention in Libya, 2021, August 17 <https://www.amnesty.org/en/documents/mde19/4439/2021/en/>; International Commission of Jurists, HRC62: ICJ calls for an end to abusive migration externalization practices in Libya and Tunisia, 2026, June 23. *International Commission of Jurists*. <https://www.icj.org/hrc62-icj-calls-for-an-end-to-abusive-migration-externalization-practices-in-libya-and-tunisia/>

⁵⁸ On Borders, Researchers X, Asgi, Border Forensics, The Routes Journal, & Melting Pot. 2026. 33 TESTIMONIES FROM AN EXTERNAL EU BORDER. https://statetrafficking.net/WomenStateTrafficking_EN.pdf; SOS MEDITERRANEE. 2026, May 28. Funding violence: The hidden cost of European policies in Libya - SOS MEDITERRANEE. <https://www.sosmediterranee.org/report/funding-violence-the-hidden-cost-of-european-policies-in-libya/>

⁵⁹ Tunisia: Crisis as Black Africans expelled to Libya border. 2023, July 6. Human Rights Watch. <https://www.hrw.org/news/2023/07/06/tunisia-crisis-black-africans-expelled-libya-border>

⁶⁰ European Court of Auditors, Special report 17/2024: The EU trust fund for Africa - Despite new approaches, support remained unfocused. European Court of Auditors, 2024. <https://www.eca.europa.eu/en/publications/SR-2024-17>

in funding for the external dimension of migration, asking the Commission to:

- » Conduct systematic risk assessments in the design and formulation phase and accompany them with mitigating measures
- » Develop and circulate clarified internal procedures for reporting and following up on human rights allegations in the context of EU-funded projects
- » Analyse information related to human rights risks whether obtained through third-party monitoring of human rights or other means such as allegations; identify the entity responsible for making such analyses; maintain a record of all actions taken in response and the reasons for deciding to continue or suspend EU support

In its response to the Court, the Commission accepted these recommendations and specified a targeted implementation date at the end of 2025.⁶¹ In a letter⁶² from the Danish Presidency to the Council Working Party on External Aspects of Asylum and Migration, the Presidency informs members of progress and challenges in implementing the Human Rights-Based Approach (HRBA) across all aspects of migration cooperation, and of the measures the Commission adopted following the European Court of Auditors' report.

Firstly, the Commission has now developed a detailed guidance document titled *'The Human Rights-Based Approach in Migration and Forced Displacement'* for its staff working on migration and forced displacement interventions with partner countries and is training the staff based on this document. Then, the Commission and EEAS *"formalised an internal procedure to be followed by all staff in HQ and EU Delegations when allegations of human rights abuses or violations in*

EU-funded projects are received. This will ensure that, if allegations are substantiated, funding can be swiftly suspended or terminated to ensure that EU-funded projects are not perpetuating harm to the rights of migrants".⁶³ Finally, new contractual templates have been adopted to strengthen human rights safeguards, particularly regarding asset transfers.

At the time of writing, these documents are not publicly available. However, in conversations with the European Commission, representatives stressed the importance of these new measures to comply with the ECA's recommendations. In the most recently adopted Action Documents, particularly in North Africa (see Chapter 4.1), several mentions of the HRBA and do-no-harm principles appear. For instance, the context analysis of the Action Document *Support to strengthening migration governance and management* adopted in 2024 stresses that *"it is important to understand how and to what extent EU-funded projects have improved (or endangered) the human rights situation for migrants, refugees, IDPs, and host communities in the region"*⁶⁴ and the risk assessment acknowledges several human rights-related risks, such as supporting human rights abuses or refoulement. However, the mitigating measures proposed are rather weak, as they mainly entail several monitoring exercises, including independent third-party monitoring, result-oriented monitoring missions, external evaluations, strengthening of implementing partners' internal due diligence systems, and a new incident tracker to investigate incidents where human rights violations may have occurred in relation to EU support in Libya. **What is still missing from the picture is clarity over the internal procedures activated when human rights violations are reported, how external actors like civil society can safely report alleged violations and be informed about**

⁶¹ European Commission, REPLIES OF THE EUROPEAN COMMISSION TO THE EUROPEAN COURT OF AUDITORS' SPECIAL REPORT - The EU trust fund for Africa Despite new approaches, support remained unfocused, 2025 Available here: https://www.eca.europa.eu/Lists/ECARepplies/COM-Replies-SR-2024-17/COM-Replies-SR-2024-17_EN.pdf

⁶² Council of the European Union, Human rights-based approach to migration cooperation. 2025, September 3. <https://www.statewatch.org/media/5149/11681-2025-human-rights-based-approach-to-migration-cooperation.pdf>

⁶³ Ibidem

⁶⁴ European Commission, *Support to strengthening migration governance and management*. Publications Office of the European Commission, 2024. https://enlargement.ec.europa.eu/document/download/ee29079a-ccf9-4a76-9d1c-7ae3e69bc43e_en?filename=C_2024_7998_F1_ANNEX_EN_V2_P1_3737156.PDF

the steps taken by the Commission after the internal procedure is triggered, and ultimately which mitigating measures are put in place, including the suspension of funding. Importantly, Article 29 of the NDICI Regulation specifies that Union funding under the Instrument shall not support actions or measures that could lead to human rights violations in partner countries.

Based on publicly available information so far, it is not possible to assess whether the Commission's recent measures constitute concrete steps toward ensuring human rights due diligence in EU funding for external migration support, particularly for high-risk interventions such as border management. What is clear, though, is that engagement with countries like Libya – despite the extensive evidence of human rights abuses – continues unchallenged, as recently shown by the decision to fund a new Maritime Rescue Coordination Centre (MRCC) in the Eastern part of the country.⁶⁵

Due Diligence in Italy's External Dimension of Migration

Unlike the European Union, where the development of a human rights due diligence framework governing external funding has at least begun, Italy has yet to take concrete steps in this direction. A recent legal opinion issued by the Legal Clinic of the Department of Law at Roma Tre University argues that donor States are subject to an obligation of due diligence.⁶⁶ **This obligation does not arise from exercising full and effective control over the recipient State, but from the donor's ability to influence the source of the risk. This capacity is inherently created through the provision (or withholding) of funding, transport assets, training, and other forms of operational support.**

In practical terms, this obligation would require donor States to conduct comprehensive human rights impact assessments of the activities they support, establish independent, continuous monitoring mechanisms, and ensure access to effective remedies through appropriate redress. Already in 2017, the Committee Against Torture criticised Italy for failing to make its cooperation with Libya conditional upon respect for human rights and called for the establishment of an effective mechanism for monitoring the human rights situation in Libya.⁶⁷ However, to this day, Italy has not implemented any such safeguards and remains far from recognising an autonomous due diligence obligation in international cooperation. This underscores the urgent need for a domestic legal framework that translates such obligations into concrete legal duties governing the provision of funding, equipment, and other forms of support to third countries.

2.7 - Transparency

Transparency is undoubtedly central to any analysis of migration policy, and even more so when it comes to border externalisation. The principle of transparency should be understood as a broad democratic principle that bears on decision-making and policy-making processes, the accountability of public administrations, and the possibility of scrutiny by Parliament and civil society. In externalisation processes, these safeguards are placed under severe strain because of the multiplicity of actors involved, the plurality of funding streams, and the resort to informal arrangements, with a growing share of documents treated as inaccessible.

Transparency in the EU's External Migration Expenditure

At the European level, tracking funding allocations is challenging because the information is

⁶⁵ Statewatch, EU to increase lethal migration cooperation with Libya. 2026, January 8. <https://www.statewatch.org/news/2026/eu-to-increase-lethal-migration-cooperation-with-libya/>

⁶⁶ Roma Tre University, Department of Law International Protection of Human Rights Legal Clinic, Due Diligence Obligations of States Cooperating in Migration Management, Report 14 July 2025.

⁶⁷ Committee Against Torture (CAT), Concluding observations on the combined fifth and sixth reports of Italy, 18 December 2017, par. 22-23.

complex and hard to access. While programming documents are generally available on the Commission's webpages, information is scattered across different Directorates-General's (DGs) webpages inconsistently. As previous analyses have shown,⁶⁸ the lack of a single database or repository of NDICI-GE projects makes scrutiny extremely complex for external actors, including civil society, academia, journalists, and citizens. In recent years, improvements have enhanced the visibility of the 10% migration and forced displacement target. In 2025, DG INTPA published for the first time a complete list⁶⁹ of all adopted actions on migration and forced displacement funded by NDICI-GE.⁷⁰ The list provides a useful overview of all the actions adopted, their budget and relevant documentation. While this is a welcome step, further improvements could ensure greater transparency and accountability in NDICI-GE budget allocations, for instance by gathering all programming documents on a single webpage that allows filtering by markers, spending targets, Commission services, etc. This list served as the basis for our analysis, both to provide a quantitative overview of where and how the funding has been allocated and to qualitatively analyse the key areas of intervention funded, their main objectives, activities, and alignment with ODA principles.

Another limitation is that the programming documents tell only part of the picture, as they don't include final expenditure details. This is an important distinction to make: with the information publicly available, it is not possible to effectively track how the money is spent on the ground; this would require a detailed analysis of

the contracts signed between the Commission, the implementing partners, and other contractors and sub-contractors in partner countries, which are not publicly available, and hence go beyond the scope of this analysis. Suffice it to say that the NDICI-GE 10% migration and forced displacement target has been surpassed in these years of implementation: in the 2024 report of the mid-term review of NDICI-GE, the Commission stated that "NDICI-Global Europe 2021-2022 cumulative figure shows a contribution to the migration and forced displacement spending target of 14% of total commitments".⁷¹ Inevitably, this analysis cannot capture the full scope of the expenditure, but it provides an overview of how the budget has been allocated so far.

Transparency in Italy's External Migration Expenditure

At the Italian level, the difficulty of accessing and systematising information and documents is evident in the work carried out by *The Big Wall*, ActionAid Italy's observatory on border externalisation. The observatory has mapped over 350 interventions, along with related policy documents and underlying agreements; it did so almost entirely through FOI requests, since project documentation is rarely made public. Online information is very limited and, in most cases, available only to comply with legal transparency obligations.⁷² Under these rules, Italian public authorities must publish certain official documents on a dedicated section of their websites, known as 'Transparent Administration' (*Amministrazione trasparente*). For border

⁶⁸ Greens/EFA (in collaboration with ActionAid, Arci, EuroMed Rights, Profundo) Beyond borders, beyond boundaries, a critical analysis of EU financial support for border control in Tunisia and Libya, 2023. <https://www.greens-efa.eu/en/article/study/beyond-borders-beyond-boundaries>; Oxfam International, From Development to Deterrence? Migration spending under the EU Neighbourhood Development and International Cooperation Instrument (NDICI), Oxfam Policy & Practice, 2023, <https://policy-practice.oxfam.org/resources/from-development-to-deterrence-migration-spending-under-the-eu-neighbourhood-de-621536/>

⁶⁹ NDICI-Global Europe Actions on Migration and Forced Displacement List of actions committed (Adopted decisions), 2026. In DG INTPA. European Commission. https://international-partnerships.ec.europa.eu/document/download/7002229d-6be3-4efb-99b7-9fcb0ae665dd_en?filename=NDICI-Global%20Europe%20actions%20on%20migration%20and%20forced%20displacement.pdf

⁷⁰ At the time of writing, the document was updated to the 12th of February 2026. All actions adopted after that date are not covered in this analysis.

⁷¹ European Commission, Commission Staff Working Document Accompanying the Report from the Commission to the European Parliament and the Council on the Evaluation of the European Union's External Financing Instruments for the 2014–2020 and 2021–2027 Multiannual Financial Frameworks, SWD(2024) 133 final, 15 May 2024. <https://data.consilium.europa.eu/doc/document/ST-9989-2024-ADD-1/en/pdf>

⁷² List of current publication obligations: <https://www.anticorruzione.it/documents/91439/1149943/All.-1-obblighi-di-pubblicazione1.pdf/e2a201aa-cc31-5d82-33e0-90930e2bfae4?t=1587757904783>

externalisation, public procurement obligations are especially relevant, as they should make accessible documents on the transfer of naval and land vehicles, equipment supply, and training activities. In practice, however, the high degree of fragmentation among the administrations involved (Italy's financial police – *Guardia di Finanza*, the State Police, the Ministry of the Interior and the Ministry of Defence) makes it extremely difficult to retrieve information scattered across different websites in an unclear and incomplete manner.

Progressive legal restrictions to transparency and public access to information have aggravated this opacity. A decisive step came in 2022, with the Ministry of the Interior's 16 March decree⁷³ updating the ministerial list of documents exempt from the right of access. With this decree, a whole range of documents closely connected to border externalisation policies were included among the information withheld on grounds of security and the protection of international relations. From that moment on, documents relating to intergovernmental agreements and technical arrangements on police cooperation, *"including the management of borders and immigration"*,⁷⁴ those concerning cooperation with Frontex and the Ministry's relations with European institutions, international organisations and other States are inaccessible.⁷⁵

A concrete example shows why transparency is important for allowing the public to monitor externalisation policies. In 2024, Italy transferred six patrol boats to the Tunisian National Guard under an agreement signed at the end of the previous year. The transfer became public knowledge when the relevant decree was published on the Italian State Police's official website. After finding the document, a group of civil society organisations⁷⁶ was able to reconstruct the transfer and challenge it in court,

arguing that the Tunisian National Guard was involved in serious and documented violations of migrants' rights during interceptions at sea and subsequent returns to Tunisia.⁷⁷ The Council of State ultimately rejected the appeal in its judgment of 16 January 2025. However, the case helped bring further information about the transfer and the Italian authorities' responsibilities to public attention. At the same time, it showed the limits of relying on the publication of individual documents to ensure transparency. Knowing which decision authorises an action does not necessarily mean you can follow how it is implemented. Information on tenders, contracts, monitoring activities, and the actual use of the equipment may remain fragmented, unpublished, or difficult to find.

This distinction is even more important in light of the legal changes introduced at the end of 2024. With the conversion of Decree-Law 145/2024 on migration management, the scope of derogations from the Public Contracts Code for contracts related to border and migration control was expanded. The Code provides for transparency and publication requirements that make it possible, among other things, to identify the actors involved, the procedures used, and the resources committed. Using exceptions to these rules can reduce the information available and make it harder to understand how interventions are contracted and carried out. The change also applies to the supply of equipment used for border and migration control. For these supplies, the rules governing classified contracts may apply, with more limited publication requirements than those of ordinary procedures. The issue is therefore not only whether it is possible to reconstruct spending after the fact. **If documents relating to tenders, contracts, or interventions are not accessible, it also becomes harder to identify in time which decisions should be subject to**

⁷³ Decree of the Ministry of the Interior, 2022, March 16. https://www.interno.gov.it/sites/default/files/2022-03/dm_atti_sottratti_accesso_16-03-2022.pdf

⁷⁴ Ibidem

⁷⁵ Statewatch, Italy: Migration, borders and freedom of information: decree aims to "nullify any glimmer of transparency", 16 August 2022. <https://statewatch.org/news/2022/august/italy-migration-borders-and-freedom-of-information-decree-aims-to-nullify-any-glimmer-of-transparency/>

⁷⁶ ASGI, ARCI, ActionAid, Mediterranea Saving Humans, Spazi Circolari and Le Carbet.

⁷⁷ ASGI, Motovedette alla Tunisia, il Consiglio di Stato accoglie l'istanza cautelare della società civile, 20 Giugno 2024. <https://www.asgi.it/asilo-e-protezione-internazionale/motovedette-alla-tunisia-il-consiglio-di-stato-accoglie-listanza-cautelare-della-societa-civile/>

scrutiny and to gather the information needed to challenge them.

In this context, legal action has become one tool civil society uses to expand access to information. It can be used both to challenge an administrative decision on its merits, as in the case of the patrol boats intended for Tunisia, and to seek a court order granting access to documents the administration has refused to disclose. **The relationship between transparency and legal action therefore works in both directions: access to information enables judicial scrutiny, while legal proceedings can, in turn, bring to light documents and information that would otherwise be difficult to obtain.** However, legal action remains costly and slow, and it cannot replace normal publication and access requirements.

2.8 - Parliamentary Scrutiny

Beyond public access to information and documents, the question of lack of transparency also manifests in the limited powers of the European and national parliaments to scrutinise and challenge the use of public resources in the external dimension of migration.

The power of scrutiny of the European Parliament

The European Parliament faces several challenges in properly scrutinising NDICI-GE funding, not only in the area of migration. The DEVE and AFET Committees in the Parliament are responsible for overseeing NDICI-GE programming. However, as previous analyses have shown,⁷⁸ several factors limit the Parliament's ability to scrutinise the

budget. While NDICI programming documents are shared with the Parliament as Draft Implementing Acts, the timeframe for objections is very short. Moreover, because they are Implementing Acts, objections can only result in a formal revision by the Commission, and Parliament cannot compel the Commission to block fund disbursements.⁷⁹ A key example of this process and its limitations occurred in 2023, when the Parliament attempted to challenge the disbursement of €150 million in budget support to Tunisia under the EU-Tunisia MoU adopted that year. In that instance, the European Parliament passed a Resolution demanding that the European Commission explain how the decision to disburse the €150 million aligned with the criteria for respecting fundamental rights, and why the money was disbursed in a single tranche rather than in gradual disbursements.⁸⁰ However, the resolution was not a formal objection: because this was a first attempt of this kind and internal procedures for raising formal objections were unclear, it was not possible to proceed; only an alternative Resolution could be tabled. The key difference is that had it been possible to file the objection resolution through the formal procedure, the President of the European Parliament would have had to send a letter to the European Commission President informing the Commission that the European Parliament formally objects to the project – which, in this case, did not happen. Nonetheless, this case remains a key example of the Parliament taking a strong political stance against a specific funding decision.⁸¹

Beyond these limitations, another key challenge is that the documents scrutinised by the Parliament do not present the full picture of external action programming in a specific country or region, because NDICI-GE programming documents are usually part of broader strategies drafted as part

⁷⁸ Greens/EFA (in collaboration with ActionAid, Arci, EuroMed Rights, Profundo) Beyond borders, beyond boundaries, a critical analysis of EU financial support for border control in Tunisia and Libya, 2023. <https://www.greens-efa.eu/en/article/study/beyond-borders-beyond-boundaries>; Oxfam International, From Development to Deterrence? Migration spending under the EU Neighbourhood Development and International Cooperation Instrument (NDICI), Oxfam Policy & Practice, 2023, <https://policy-practice.oxfam.org/resources/from-development-to-deterrence-migration-spending-under-the-eu-neighbourhood-de-621536/>

⁷⁹ Council of the EU, The Council's Role in EU Decision Making; <https://www.consilium.europa.eu/en/council-eu/decision-making/implementing-and-delegated-acts/>

⁸⁰ Interview with representative of the European Parliament.

⁸¹ Ibidem

of Team Europe Initiatives⁸² and with the so-called European Council's Operational Coordination Mechanism for the External Dimension of Migration (MOCADDEM),⁸³ which the Parliament does not have access to.

Formal information-sharing structures exist, but they are merely informative and do not provide the Parliament with concrete measures to challenge or block funding allocations. For instance, the Commission is supposed to inform the Parliament before it mobilises the Emerging Challenges and Priorities Cushion, submit an annual report to the Parliament and the Council on progress towards NDICI's objectives, and organise a biannual high-level geopolitical dialogue with the Parliament on the implementation of NDICI.

At the same time, the NDICI Regulation also foresees the establishment of a coordination group to oversee specifically the migration and forced displacement component of the Instrument. However, the coordination group includes only the Commission, the External Action Service, and two representatives per Member State.⁸⁴ The group can discuss three main items: implementation of NDICI programming on migration and forced displacement; coordination ahead of future projects in a Team Europe approach; information sharing on approved projects. While the Commission commits to regularly informing both the European Parliament and the Council on NDICI programming, these years of implementation have clearly shown an imbalance in information sharing between the

Commission and the Council compared to the Parliament.

The role of the Italian Parliament

At the Italian level, parliamentary oversight faces several limitations. In its financial dimension (i.e., holding the government accountable for how public resources are raised and spent), parliamentary scrutiny occurs within the budget cycle. The Parliament's chambers annually approve both the budget (which authorises expenditure in advance) and the final accounts (through which the government provides a retrospective account of its results)⁸⁵. The Court of Auditors, an auxiliary body reporting directly to the Chambers, also contributes to this oversight. Parliament retains other, broader channels for financial oversight, such as reviewing economic and financial planning documents, the work of budget committees, access to public finance databases, and specific parliamentary questions on accounting matters.⁸⁶ However, outside the budget cycle, none of these channels constitutes a continuous, systematic tool for tracking a specific expenditure item. Therefore, parliamentary scrutiny tends to be sporadic and largely indirect.

Individual members of Parliament can employ oversight mechanisms such as parliamentary questions, interpellations, and motions to compel the Government to disclose specific facts and justify its conduct. Parliamentarians also have powers of direct inspection, which allow them to

⁸² The Team Europe approach was initially launched during the Covid-19 pandemic to ensure a coordinated response between the EU and Member States. It has then expanded to other areas of intervention, including the EU external action and migration where the objective is for the EU, its Member States - including their implementing agencies and public development banks - as well as the European Investment Bank and the European Bank for Reconstruction and Development to work together and pool resources and expertise. See: https://international-partnerships.ec.europa.eu/policies/team-europe-initiatives_en

⁸³ MOCADDEM is a mechanism for operational coordination of the external dimension of migration, established in 2022. It is formed by Member States' representatives and other stakeholders, including the Commission and the External Action Service, who discuss, prepare and propose 'actions' in the external dimension of migration. MOCADDEM sits under the Council's Presidency and coordinates with other existing Council configurations, including the Committee of Permanent Representatives (Coreper). MOCADDEM is shrouded in extreme opacity, and very little information is publicly available about its composition, ways of working, structure, and influence over the use of EU funding in the external dimension of migration – while also being outside the European Parliament's power of scrutiny. See: Chris Jones, 'Editorial', in *Outsourcing Borders: Monitoring EU Externalisation Policy – Bulletin 2*, Statewatch, 1 July 2024. <https://statewatch.org/outsourcing-borders-monitoring-eu-externalisation-policy/bulletin-2/#editorial>

⁸⁴ Coordination group on migration under the NDICI - Global Europe and the Member States' bilateral cooperation instrument. https://international-partnerships.ec.europa.eu/document/download/42c456e5-c383-4ce7-812a-295191eaabfa_en?filename=NDICI-GE%20-%20Migration%20coordination%20group%20ToR.docx.pdf

⁸⁵ Italy, Law No. 196 of 31 December 2009, Law on Public Accounting and Public Finance.

⁸⁶ Camera dei deputati, *Contabilità e strumenti di controllo della finanza pubblica, I temi dell'attività parlamentare nella XVI legislatura, Documentazione e ricerche No 1/9* (Servizio Studi, March 2013).

verify the Government's actions on-site. A clear example is the power to visit places of detention, such as penal institutions and facilities for the administrative detention of individuals lacking a residence permit (such as Repatriation Detention Centres - *CPRs*).

The problem, however, lies in the effectiveness of these oversight mechanisms, particularly regarding the external dimension of migration. Where activities take place in a third country under the jurisdiction of different state authorities, Italian parliamentary oversight loses its grip. This makes it impossible for an individual parliamentarian to exercise indirect oversight powers regarding activities funded and implemented in third countries. Consequently, a parliamentarian would be unable to carry out a mission in a third country to verify how resources are used, the effectiveness of human rights training, or the development cooperation interventions themselves.

With the Pact on Migration and Asylum taking effect in June 2026 and expenditure on migration cooperation with third countries rising, the question is no longer whether a scrutiny gap exists, but how to bridge it. One option is to introduce *ad hoc* legislation to extend Parliament's powers of inspection and information gathering to public funds deployed beyond national borders. A second, less ambitious approach could entail introducing a dedicated reporting requirement, linked to the budgetary cycle, involving an annual report to Parliament on migration cooperation spending in third countries. A third option would be to establish a parliamentary committee of inquiry endowed with powers equivalent to those of judicial authorities, capable of investigating conduct that falls outside the reach of standard oversight mechanisms.

3 - A QUANTITATIVE ANALYSIS OF FUNDING ALLOCATIONS

After providing an initial overview of the different types of funding instruments that rely, either fully or partially, on resources classified as Official Development Assistance (ODA), we now turn to the scale of these resources and to the priorities and sectors to which they are allocated. For this mapping exercise, we defined a specific time frame. For EU funds channelled through the NDICI-GE instrument, we mapped funding allocations from 2021, when the instrument became operational, to 2025. For Italian funding instruments, we selected different time periods depending on each fund's specific characteristics and implementation timeline. For the Incentive Fund for Return Policies, the relevant programmes began implementation in 2022. For the Migration Fund, we selected the period 2020-2025 to capture a longer-term trajectory in its operations and resource allocation. For funding under Chapter 2371, we analysed allocations starting in 2019, the year the first RELINT call for proposals was launched.

This analysis requires a methodological clarification of the intervention categories used. For EU external migration action, the categories are, at least in part, defined by the European Commission and the relevant programming frameworks (Table 5). They are therefore not neutral technical labels but policy categories that reflect the EU's political priorities and shape how external action is planned, reported and assessed. Some of them remain analytically and politically problematic – as in the case of *root causes*, which is not a category formally recognised by the OECD-DAC – and their use may still leave considerable discretion in the classification of projects. Nevertheless, they provide a shared reference framework for tracking and comparing expenditure.

The Italian case is different. For the funds analysed in this report – in particular the Incentive Fund for Return Policies and the Migration

Fund – the available project documents do not provide an explicit and consistent taxonomy of intervention areas. The categories used in this analysis therefore had to be reconstructed inductively, based on three elements: the titles and descriptions of funded projects; the content of selected project activities; and the rationale of the funds themselves as set out in their founding decrees. In this sense, the categories adopted here – *Protection, Border Management, Root Causes, Anti-trafficking, Governance, Return and reintegration, Awareness-Raising and Legal Pathways* – should not be understood as official Italian classifications, but as analytical categories derived from the stated objectives and content of the funded interventions (Table 6). This reconstruction was made possible only through FOI requests, which allowed us to obtain information not systematically available in public reporting.

The difference between the EU and Italian dimensions is therefore not merely technical or methodological, but also political. While the EU framework provides debatable but at least visible and comparable categories, the Italian framework lacks a formal, shared taxonomy.

3.1 - NDICI Global Europe

The list of all adopted actions under the 10% migration and forced displacement target provides a useful overview of how funding has been allocated in these first years of implementation. The list includes the action title, budget, countries of implementation, relevant programming document, year of adoption, thematic area, and marker. The actions in the list are marked as either 1 or 2 and do not include other actions that might still address migration or forced displacement at less than 40%. Thematic areas are used to divide the actions into categories of interventions, as shown in Table 5:

TABLE 5. NDICI-GE categories description

Category	What it includes
Protection	Provision of assistance and basic services to refugees, internally displaced persons and vulnerable populations in third countries, such as: healthcare, gender-sensitive and child-focused protection response, distribution of basic goods, psychosocial support and cash assistance. This category is used primarily in the neighbourhood region (DG MENA and DG ENEST)
Forced displacement	Similar to protection, with a slightly wider focus on durable solutions. Activities include gender-sensitive and child-focused protection response; access to shelter and sanitation; health care; education and social services; support to forcibly displaced populations and host communities; social cohesion; access to social protection and the labour market; and supporting policy and institutional development for an adequate response to the needs of forcibly displaced populations. This category is used primarily in Africa, Asia and the Pacific and the Americas and Caribbean (DG INTPA).
Migration and border management, fight against migrant smuggling and trafficking (abbreviated as Border management)	Support to strengthen border management for both land and sea borders, through provision of equipment, training, development of procedures, and enhancement of surveillance capacities. The category also covers initiatives to combat human trafficking and migrant smuggling in cooperation with third countries, mainly through law enforcement training, administrative capacity building, and victim support.
Return and Reintegration	Initiatives supporting migrants' return from transit or host countries to countries of origin and related reintegration assistance. This category may include assisted return programmes, such as those labelled as assisted voluntary return by implementing agencies, as well as humanitarian repatriation, evacuation from transit contexts, and post-return support.
Addressing root causes of irregular migration, through job creation and stabilisation	Initiatives aimed at addressing the socio-economic drivers of so-called irregular migration in countries of origin or transit. Activities typically include job creation, vocational training, agricultural and rural development, livelihood support, resilience-building and social cohesion
Legal Migration and Labour Mobility	Initiatives supporting legal migration and mobility pathways include strengthening employment and labour mobility policies; expanding Talent Partnerships programmes; supporting skills development and the recognition of qualifications; fostering partnerships among public, private, and diaspora stakeholders; and facilitating student mobility and professional integration.

Source: authors' elaboration of NDICI project documents analysed for this study.

Beyond these main categories, there are other minor ones, such as *Collection, analysis, and dissemination of data; migration and development*; and others.

Figures 2 and 3 below provide a quantitative overview of how the budget has been allocated

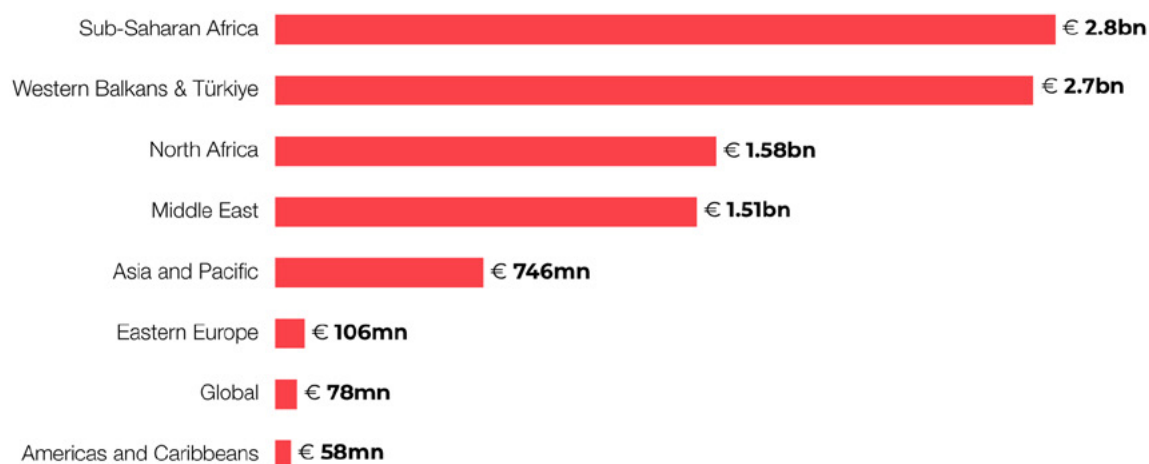
so far by region and category. Figure 2 shows how much of the overall NDICI-GE migration target of €7,9 billion has been allocated to each region, while Figure 3 shows how much of the NDICI-GE target has been allocated to each category of intervention. For these calculations, we counted

100% of the budget for actions with marker 2, and 40% of the budget for actions with marker 1.

When looking at the overall budget allocation per region (Figure 2), Sub-Saharan Africa has received the most funding, with €2,8 billion allocated so far, corresponding to 36% of the target. Closely following are the Western Balkans and Türkiye, which received €2,7 billion (34% of the target).

Importantly, all except one programme for this region went to Türkiye. North Africa is third, with €1,58 billion (20% of the target), followed by the Middle East with €1,51 billion (19% of the target), Asia and Pacific with €746 million (9% of the target), Eastern Europe with €106 million (1.3% of the target), Global programmes with €78 million (1% of the target) and Americas and Caribbean with €58 million (0.7% of the target).

FIGURE 2 - Overview of contributions to the NDICI migration target (€7,9 billion) by region 2021-2025



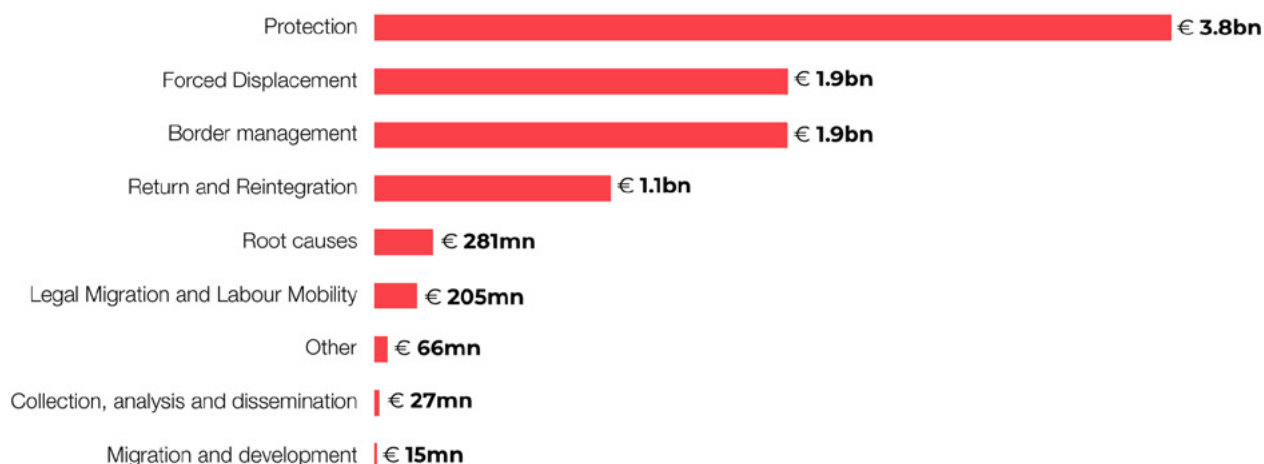
Source: authors' elaboration of European Commission data present in the list of NDICI-GE actions that are part of the migration and forced displacement target.⁸⁷

The types of actions funded in each region vary according to the local and regional context, most pressing needs and political priorities. When looking at how the NDICI-GE migration target of €7,9 billion has been allocated across the different thematic priorities globally (Figure 3), the priorities rank as follows. *Protection* received €3,8 billion (48% of the target); *forced displacement and migration and border management, fight against migrant smuggling and trafficking* both received €1,9 billion each (corresponding to 25% of the target each); *return and reintegration* received €1,1 billion (14% of the target); *root causes* received €281 million (4% of the target); *legal migration and labour mobility* received €205 million (3% of

the target); *collection, analysis and dissemination of data* received €27 million (0.3% of the target); *migration and development* received €15 million (0.1% of the target); finally, the category 'other' groups together individual or *ad-hoc* programs that exist only in one country or region.

⁸⁷ NDICI-Global Europe Actions on Migration and Forced Displacement List of actions committed (Adopted decisions), 2026. In *DG INTPA*. European Commission. https://international-partnerships.ec.europa.eu/document/download/7002229d-6be3-4efb-99b7-9fcb0ae665dd_en?filename=NDICI-Global%20Europe%20actions%20on%20migration%20and%20forced%20displacement.pdf

FIGURE 3 - Overview of contributions to the NDICI migration target (€7,9 billion) by thematic area 2021-2025



Source: authors' elaboration of European Commission data present in the list of NDICI-GE actions that are part of the migration and forced displacement target.⁸⁸

It's important to note that rankings across categories vary widely by region. For instance, the category of *Protection* ranks first when looking at the total budget allocation, mainly because of big protection programmes in Türkiye, like *Support to Inclusive Quality Education for Refugees in Turkey* (€530 million), *Emergency Social Safety Net IV* (€400 million) and *Basic needs, municipal infrastructure, health and social cohesion support*

for refugees in Türkiye (€406 million), which alone contribute to boosting the overall budget going to protection. However, when looking at the ranking of thematic areas within each region, the results can be very different, as shown in the following examples:⁸⁹

⁸⁸ NDICI-Global Europe Actions on Migration and Forced Displacement List of actions committed (Adopted decisions), 2026. In *DG INTPA*. European Commission. https://international-partnerships.ec.europa.eu/document/download/7002229d-6be3-4efb-99b7-9fcb0ae665dd_en?filename=NDICI-Global%20Europe%20actions%20on%20migration%20and%20forced%20displacement.pdf

⁸⁹ For Sub-Saharan Africa, the graph takes into account the single Actions adopted under the Flexible Mechanism, which amount to €338 million. However, the total budget allocated so far to the FM is higher: €520 million approved so far, and €600 million in total over 7 years.

FIGURE 4. Allocations by Categories of Intervention in the Middle East (€1.51 billion) 2021-2025

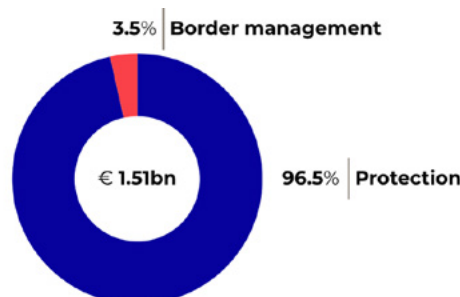


FIGURE 5. Allocations by Categories of Intervention in North Africa (€1.58 billion) 2021-2025

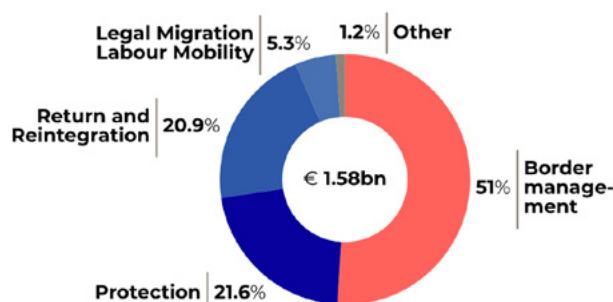


FIGURE 6. Allocations by Categories of Intervention in Sub-Saharan Africa (€2.8 billion) 2021-2025

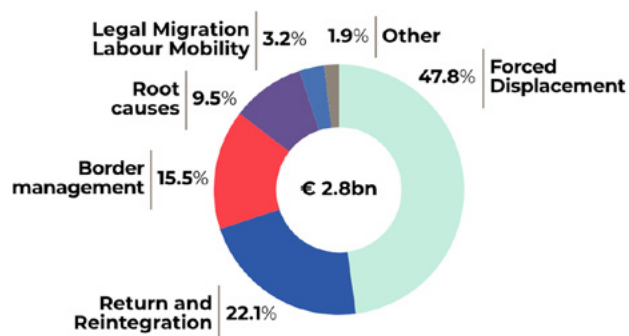
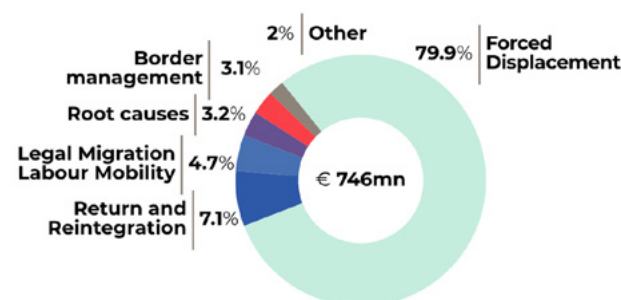


FIGURE 7. Allocations by categories of intervention in Asia and the Pacific (€746 million) 2021-2025



Source: authors' elaboration of European Commission data presented in the list of NDICI-GE actions that are part of the migration and forced displacement target.⁹⁰

In North Africa in particular (Figure 5), the category of border management alone received 51% of the funding (€807 million), followed by protection (22% – €343 million), return and reintegration (21% – €330 million), legal migration and labour mobility (5% – €83 million). As the following chapter will show, the intervention categories that dominate North Africa, such as border management and returns, are also where the political objectives of deterrence and preventing arrivals are most evident, calling into question their ODA eligibility and coherence with development objectives. In Sub-Saharan Africa (Figure 6), the category of forced displacement received 48% of the funding (€1,3 billion), followed by return and reintegration

(23% – €600 million), migration and border management (15% – €422 million), root causes (9% – €258 million), legal migration and labour mobility (3% – €87 million) and other minor ones.

Finally, it is important to note that the Commission uses the division of actions into thematic areas to provide quantitative analyses of budget allocation.⁹¹ However, this classification is not always self-evident, as interventions can be multifaceted and fall into more than one category. At the same time, the lack of a commonly agreed-upon definition for each thematic area implies that the distinction between some of them can be blurry.

⁹⁰ NDICI-Global Europe Actions on Migration and Forced Displacement List of actions committed (Adopted decisions), 2026. In *DG INTPA*. European Commission. https://international-partnerships.ec.europa.eu/document/download/7002229d-6be3-4efb-99b7-9fcb0ae665dd_en?filename=NDICI-Global%20Europe%20actions%20on%20migration%20and%20forced%20displacement.pdf

⁹¹ Interview with representative of European Commission.

3.2 - Italian funding instruments

When the Italian funding instruments are aggregated by geographical area, using the same regional breakdown as for NDICI-GE, a marked concentration of resources emerges. North Africa accounts for most of the expenditure, followed by sub-Saharan Africa, whilst the other regions (the Balkans, Eastern Europe, Asia and the Pacific) remain marginal. The Italian data clearly reflect the country's political priorities in migration cooperation, with a focus on transit countries and the Central Mediterranean route.

Based on the mapping methodology outlined above, ActionAid's The Big Wall observatory organises Italian external migration expenditure into eight spending categories. These categories help illustrate how externalisation-related funds are allocated, taking into account the hybrid nature of the financed interventions.

The categories are not mutually exclusive: when an intervention falls under more than one category, the budget is split equally among the types of activities funded. The taxonomy is not arbitrary but reflects the migration policy objectives formally articulated by Italian institutions.

TABLE 6. Italian expenditure categories

Categorie	Descrizione
Border management	Support to governments and security forces of third countries to strengthen control of land and sea borders, including the provision of equipment and vehicles, training of police forces and coast guards, and surveillance of the Central Mediterranean.
Protection	Mainly humanitarian assistance to refugees, internally displaced persons and vulnerable populations in third countries, including healthcare, distribution of basic goods, psychosocial support and cash assistance.
Root causes	Development cooperation initiatives aimed at addressing the socio-economic drivers of so-called irregular migration and forced displacement in countries of origin or transit. Activities typically include job creation, vocational training, agricultural and rural development, livelihood support, resilience-building and social cohesion
Governance	Support to third-country authorities in developing regulatory frameworks and institutional structures for migration management, always aimed at administrative capacity building and technical assistance to border police forces.
Anti-trafficking	Initiatives explicitly focused on combating trafficking in persons and migrant smuggling through law enforcement or judicial capacity-building, victim identification and assistance, and cross-border cooperation.
Return and Reintegration	Initiatives supporting migrants' return from transit or host countries to countries of origin and related reintegration assistance. This category may include assisted return programmes, such as those labelled as assisted voluntary return by implementing agencies, as well as humanitarian repatriation, evacuation from transit contexts, and post-return support.
Awareness raising	Initiatives that inform migrants and potential migrants in countries of origin or transit about the risks of so-called irregular migration, available assistance, and local alternatives to departure.
Legal pathways	Programmes for regular access to Italian and European territory: humanitarian corridors, resettlement, labour mobility partnership agreements, funding for pre-departure preparation, pre-migration health assessments and pre-arrival orientation.

Note: Author's elaboration of project documents obtained through FOI requests, based on data from ActionAid Italy's The Big Wall Observatory.

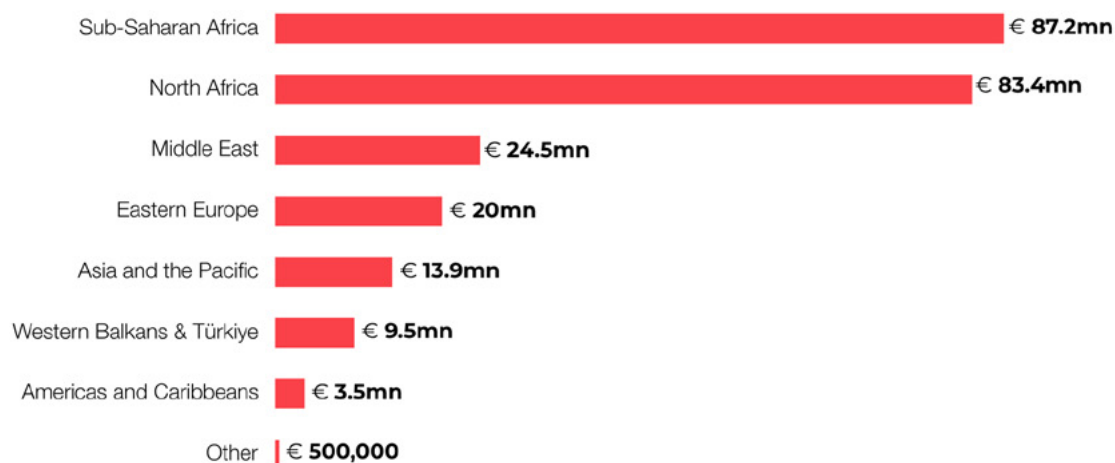
When looking at the thematic categorisation of interventions, an aggregate analysis of all funding instruments shows that *Protection* ranks first in terms of allocated resources, followed by *Border management*. This overall picture changes considerably when looking at each funding instrument separately. For instance, the Migration Fund concentrates most of its resources on *Protection*, following a logic that closely links protection activities to border control and migration management, as explained below. The Incentive Fund reverses this trend, allocating over 60% of its resources to *Border management*. This concentration aligns with the Fund's stated purpose of encouraging cooperation by non-EU countries on the readmission of their nationals, as well as its priority of including institutional capacity-building in recipient countries in border control and anti-trafficking. Finally, Chapter 2371 operates differently: it partly funds *Root Causes* and *Awareness-raising* initiatives through calls for proposals open to CSOs and partly contributes directly to European programmes (MPRR-NA, THAMM+).

Taken together, the funding instruments analysed reveal a pattern of Italian external migration-related expenditure that is geographically concentrated, strongly oriented towards border management, and characterised by the absence of a unified framework for planning, monitoring and categorisation. A vertical analysis of individual funds shows how each instrument has been used in practice and the policy priorities that have shaped its development.

Migration Fund (Italian Ministry of Foreign Affairs and International Cooperation – MAECI)

Between 2020 and 2025, the Migration Fund provided approximately €242 million for initiatives in third countries, with a highly uneven distribution. The top five recipient countries were Libya (€78 million), Niger (€37 million), Moldova (€20 million), Sudan (€18 million) and Iran (€14 million). Together, they accounted for over 60% of total resources, while Libya alone received around one third.

FIGURE 8. Overview of contributions to the Migration Fund by region, 2020-2025 (€242 million)



Source: elaboration of project documents obtained through FOI requests, reworked from the ActionAid Italy Observatory *The Big Wall*.

The focus on Libya is a key point of interest. The Migration Fund was established specifically to support Italy's external action on the Central Mediterranean route, a role that has not ceased with the Fund's reform and geographical

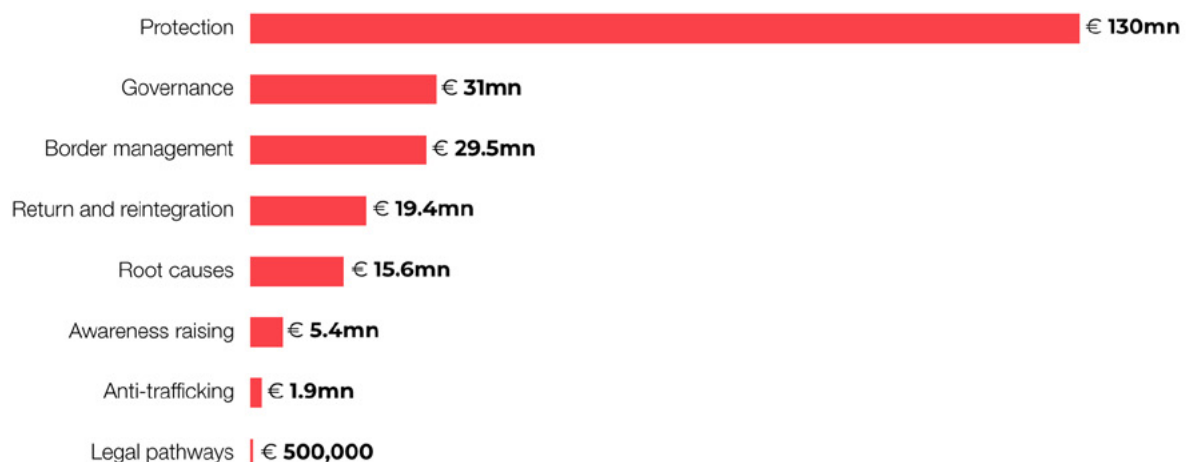
extension. This led to greater flexibility in resource use, as shown by the presence of Moldova and Iran among the top five countries, with interventions justified as responses to specific crises and emergencies.

In Moldova, the €20 million allocated from 2022 onwards through the Migration Fund is divided across three initiatives entrusted to UN agencies: €10 million to UNHCR (*Protection Activities for Refugees from Ukraine in Moldova*)⁹², €5 million to UNICEF (*Supporting the children of Ukraine: Emergency response in Moldova*)⁹³ and €5 million to IOM (*Strengthening capacities for the protection of Ukrainian refugees, third-country nationals and host communities in Moldova*).⁹⁴ The first two interventions are traditional humanitarian projects that involve protection activities linked to education and childcare, as well as cash transfers and support for reception systems. The third, entrusted to IOM, has a hybrid structure, merging both a protection and assistance component with a border management one. Indeed, over €1.3 million is earmarked for strengthening Moldova's border management capabilities, with the provision of high-capacity radio relays, dedicated

radio channels for mobile units, specialised software for data processing and integration, as well as training for law enforcement authorities, border police and customs on vulnerability screening and risk profiling at border crossings.

The interventions in Moldova demonstrate how a humanitarian crisis can be used as a pretext to fund the strengthening of a third country's border control capabilities. The stated framework is balancing protection and security, but the risk is that a significant share of resources ends up funding aspects of migration and border management. The Migration Fund therefore also operates as a tool for rapid response to situations perceived as potential sources of migratory pressure on Europe, stepping in during emergencies to achieve its own migration-cooperation objectives aimed at deterrence.

FIGURE 9. Overview of contributions to the Migration Fund by thematic area, 2020-2025 (€242 million)



Source: elaboration of project documents obtained through FOI requests, reworked from the ActionAid Italy Observatory The Big Wall.

Most of the resources allocated go to *Protection* (56%), followed by *Governance* (13%), *Border Management* (12%), *Return and reintegration* (8%), *Root Causes* (6%), *Awareness-raising* (2%), *Anti-trafficking* (0.8%) and *Legal Pathways* (0.2%).

The predominance of protection interventions should be interpreted with caution, as projects increasingly combine activities across different categories. While they may include substantial protection components, these are often

⁹² The Big Wall, ActionAid Italy, *Protection Activities for Refugees from Ukraine in Moldova*

⁹³ The Big Wall, ActionAid Italy, *Supporting the children of Ukraine: Emergency response in Moldova*

⁹⁴ The Big Wall, ActionAid Italy, *Strengthening capacities for the protection of Ukrainian refugees, third-country nationals and host communities in Moldova*

accompanied by at least one activity that pursues a different objective. As a result, activities related to border management, returns, or awareness-raising may be embedded within projects classified primarily as protection. Therefore, the apparent predominance of protection may partly obscure activities that serve other policy objectives, such as voluntary humanitarian returns in Libya. From this perspective, protection interventions can become part of a broader logic of migration containment, insofar as they channel people towards return in response to vulnerabilities that are, at least in part, produced or exacerbated by the conditions of the migration route itself (see Chapter 4.2).

The regional breakdown reveals significant differences in the thematic composition of interventions financed through the Migration Fund. *Protection* is the largest expenditure category in both Sub-Saharan Africa, with €53.4 million (61%, Figure 10), and North Africa, with €47.2 million (56%, Figure 11). In both regions, resources allocated to *Border Management* are considerably lower, amounting to approximately €11 million and €8.6 million, respectively. In the Middle East, the distribution is more balanced: 35% of resources, equivalent to €8.7 million, is

allocated to *Protection*, while 32% is allocated to *Return and readmission* interventions (€8 million) (Figure 13). A different pattern emerges in Asia and the Pacific, where *Border Management* and *Governance* account for a substantially larger share and together absorb nearly two-thirds of the region's funding, totalling €8.9 million (Figure 12). In Eastern Europe, by contrast, expenditure is almost entirely concentrated on *Protection*, which accounts for 87% of resources, equivalent to €17.5 million. In the Western Balkans and Türkiye, finally, funding is distributed almost evenly between *Governance* and *Protection*, at €4.9 million and €4.5 million, respectively (Figure 16).

These differences show that the Fund does not follow a uniform thematic model, but combines instruments, resources and priorities differently depending on the geographical area and migration policy objectives. At the same time, the strong presence of *Protection* across several regions should be understood in light of the considerations discussed above: protection interventions are often embedded in broader programmes that also pursue objectives related to returns and border management.

FIGURE 10. Allocations by Categories of Intervention in Sub-Saharan Africa (€87,2 million) 2020-2025

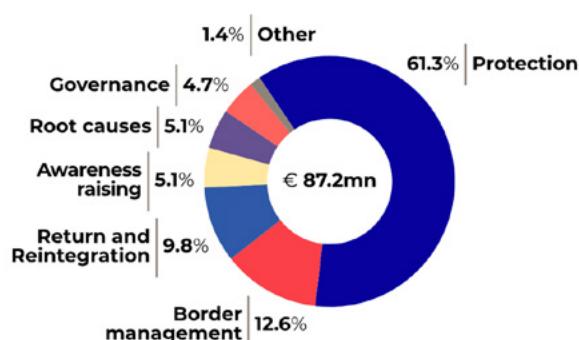


FIGURE 11. Allocations by Categories of Intervention in North Africa (€83,4 million) 2020-2025

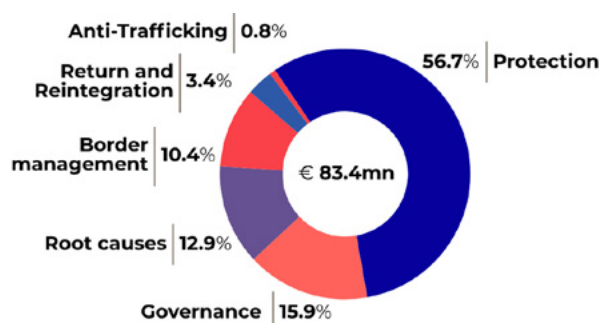


FIGURE 12. Allocations by Categories of Intervention in Asia and the Pacific (€14 million) 2020-2025

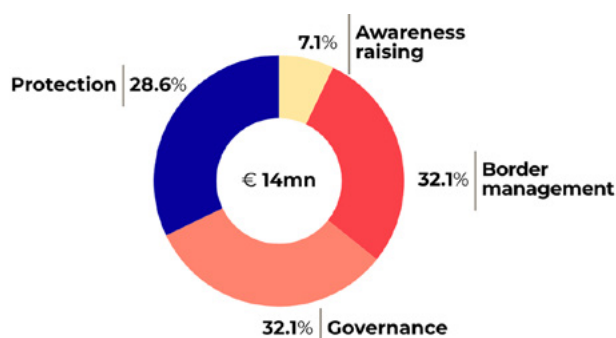


FIGURE 13. Allocations by Categories of Intervention in the Middle East (€24,5 million) 2020-2025

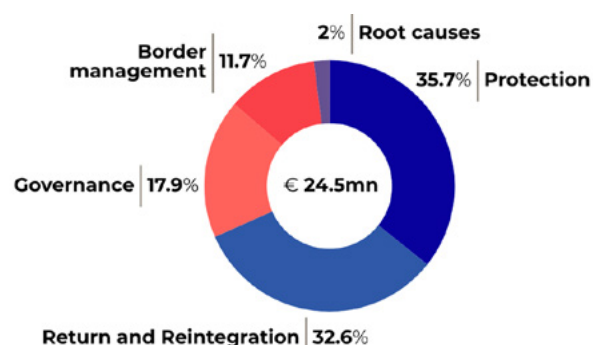


FIGURE 14. Allocations by Categories of Intervention in the Americas and the Caribbean (€3,5 million) 2020-2025

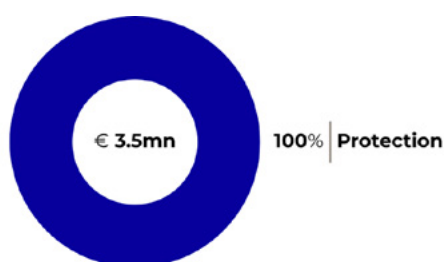


FIGURE 15. Allocations by Categories of Intervention in Eastern Europe (€20 million) 2020-2025

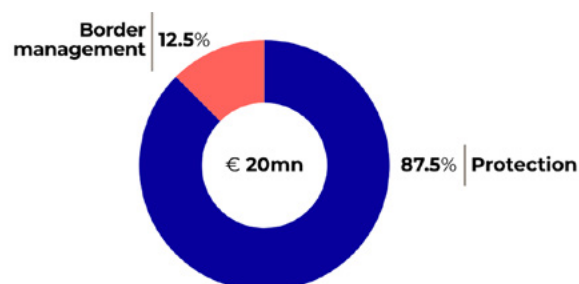
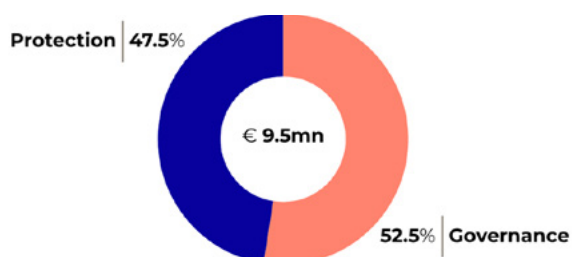


FIGURE 16. Allocations by Categories of Intervention in the Western Balkans and Türkiye (€9,5 million) 2020-2025



Note: elaboration of project documents obtained through FOI requests, reworked from the ActionAid Italy observatory The Big Wall.

Another noteworthy aspect concerns the implementing partners. Over the 2020–2025 period, resources from the Migration Fund became increasingly concentrated on a limited number of international organisations, particularly IOM and UNHCR, while agencies such as FAO, WHO, UNDP, UNODC, WFP, UNFPA and UN Women, which had

received funding during the Fund's earlier years, progressively lost relevance. This shift should be read in light of the Fund's evolving thematic and geographical orientation. As interventions became more explicitly focused on protection, return and reintegration, and border management in specific partner countries, organisations with specialised

mandates and operational expertise became the most obvious implementing partners. Conversely, agencies whose core mandates centre on areas such as food security, health, agriculture, gender equality, or broader development cooperation had fewer opportunities to fit within an increasingly migration-specific portfolio. The concentration of implementing organisations therefore stems primarily from the progressive narrowing of the Fund's objectives.

This tendency is reinforced by the institutional arrangements through which projects are implemented. The ability to award grants directly to international organisations allows the administration to mobilise actors already on the ground and shorten implementation times, while also relying on organisations formally bound by international protection standards. In this respect, recourse to UN agencies may be driven not only by operational capacity but also by the expectation that their involvement provides a degree of legal, institutional, and procedural assurance. In principle, their participation may therefore appear to offer an additional layer of protection and oversight. In practice, however, as the analysis below will show, this formal assurance does not always translate into effective safeguards for human rights, transparency, accountability or the proper management of funds. At the same time, repeated reliance on the same organisations can generate path dependency, progressively narrow the range of potential implementers and reduce the role of other actors.

Another consideration is the relationship between international organisations and their donors. Many UN agencies rely heavily on voluntary and earmarked contributions, and in some cases this dependence is particularly pronounced. IOM is a clear example: its highly 'projectized' funding model links a large share of its resources to activities financed by individual donors. This structure can make the organisation particularly responsive to Member States that can finance its operations.⁹⁵ This does not imply that

alignment with donor priorities is automatic, nor that international organisations abandon their institutional mandates. It does, however, create structural incentives to design and implement activities that remain compatible with the policy priorities of major funders, particularly where continued operational presence depends on successive project-based contributions.

Seen in this light, the increasing role of IOM, UNHCR and other international organisations in implementing the Migration Fund reflects a combination of policy specialisation, operational convenience and institutional dependence. Beyond the fact that international organisations are replacing other implementers, the issue is that the Migration Fund increasingly relies on actors whose mandates and operational structures are particularly suited to the migration-policy objectives pursued by donor States. This can blur the boundary between these organisations' independent international mandate and their role as implementing partners in national externalisation policies, even where their activities remain formally framed within broader international commitments such as the *Global Compact for Safe, Orderly and Regular Migration*, the Sustainable Development Goals and the *New York Declaration*.

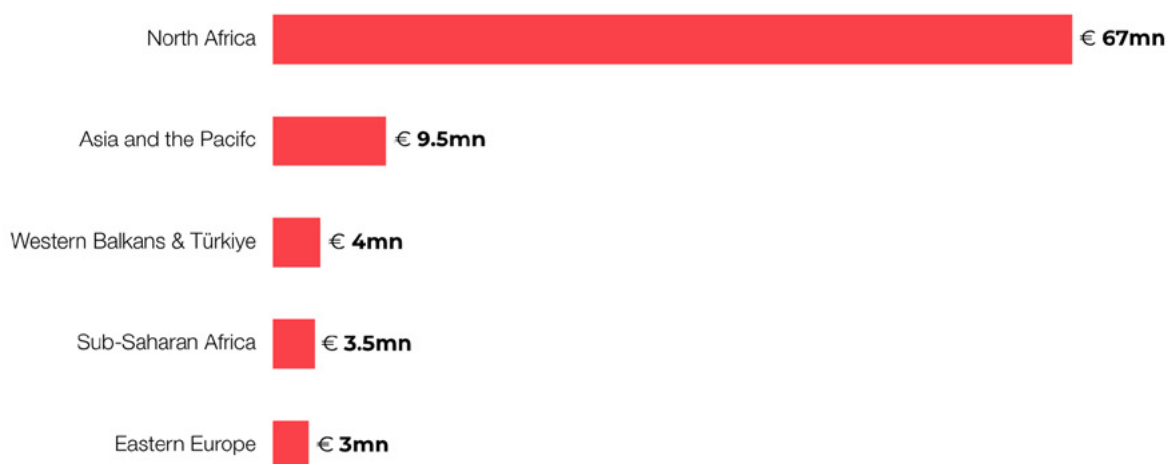
⁹⁵ Megan Bradley, Cathryn Costello, Angela Sherwood, *IOM Unbound? Obligations and Accountability of the International Organization for Migration in an Era of Expansion*, Cambridge University Press, 2023.

Incentive Fund for Return Policies (Italian Ministry of Foreign Affairs and International Cooperation – MAECI)

Over 2020–2025, the Incentive Fund funded interventions totalling approximately €87 million,

distributed across five countries: Tunisia (€67 million), Bangladesh (€9,5 million), Albania (€3,9 million), Côte d'Ivoire (€3,5 million) and Ukraine (€3 million). Tunisia alone absorbs over 70% of the Fund's resources – a concentration unmatched by any other instrument analysed.

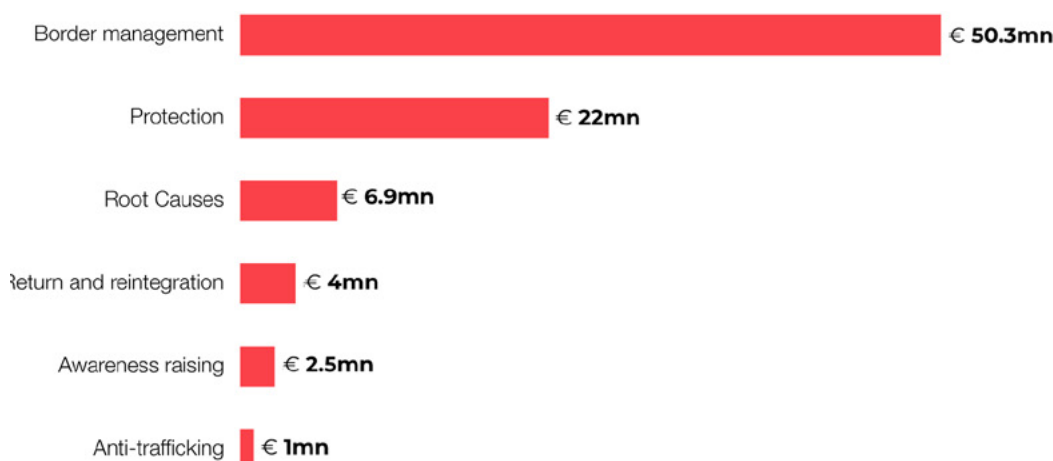
FIGURE 17. Overview of the contributions to the Incentive Fund by region (€87 million)



Source: elaboration of project documents obtained through FOI requests, reworked from the ActionAid Italy observatory *The Big Wall*.

Over 62% of resources go to *Border Management*, followed by *Protection* (20%), *Root Causes* (9%), *Return and reintegration* (6%), and *Awareness-raising* (1.9%). Interventions on *Anti-trafficking*, *Legal Pathways* and *Governance* stand at zero.

FIGURE 18. Overview of the contributions to the Incentive Fund by category (€87 million)



Source: elaboration of project documents obtained through FOI requests, reworked from the ActionAid Italy observatory *The Big Wall*.

Although formally anchored to cooperation on readmission, the Fund operates through a wide range of interventions, including institutional capacity-building, border management,

protection, assisted voluntary return and reintegration. Its logic appears to be to develop and consolidate migration cooperation with selected partner countries, rather than simply rewarding return outcomes already achieved. This is particularly evident in the concentration of resources in North Africa and the predominance of border management activities, suggesting that the Fund also supports the institutional and operational conditions for developing cooperation on migration control and readmission. Therefore, readmission remains the Fund's formal policy anchor, while its implementation encompasses a broader set of measures to shape migration cooperation with strategically relevant third countries.

The geographical distribution of resources confirms the Fund's strong concentration on a limited number of areas, particularly North Africa. The region receives €67 million, accounting for about 77% of the €87 million considered in the analysis. By far the largest share of these resources finances *Border management* activities, totalling €48.8 million, or 73% of the funding allocated to the region (Figure 20). This is followed by *Protection* interventions (€12.6 million) and interventions addressing Root causes (€3 million). Resources directly allocated to *Return and reintegration* amount to €2.5 million, representing less than 4% of the regional total. Therefore, rather than a narrow return-policy instrument, the Fund functions as a flexible financial channel through

which Italy can support a broader architecture of migration control, deterrence and cooperation with selected third countries.

In the other geographical areas, allocations are considerably smaller and have a different composition. In Asia and the Pacific (Figure 21), €9.5 million in interventions were financed: €5.5 million for *Protection*, €2.5 million for *Awareness-raising*, and €1.5 million for *Return and reintegration*. In Eastern Europe, the €3 million allocated is entirely devoted to *Protection* (Figure 22). In Sub-Saharan Africa, of the total €3.5 million, €1.5 million is allocated to *Border management*, €1 million to *Protection*, and €1 million to efforts to *Anti-trafficking* (Figure 19). In the Western Balkans, the €4 million available is fully allocated to interventions that address *Root causes* (Figure 23).

Overall, the composition of expenditure shows that, although the Fund is formally linked to return policies, it is primarily used to finance broader forms of migration cooperation with partner countries. This is particularly evident in North Africa, where *Border management* absorbs almost €49 million, while interventions classified as *Return* account for a much smaller share, at €2.5 million. The link between resource allocation and the results achieved in terms of readmission therefore appears less direct than the Fund's name itself might suggest.

FIGURE 19. Allocations by Categories of Intervention in Sub-Saharan Africa (€3,5 million) 2020-2025

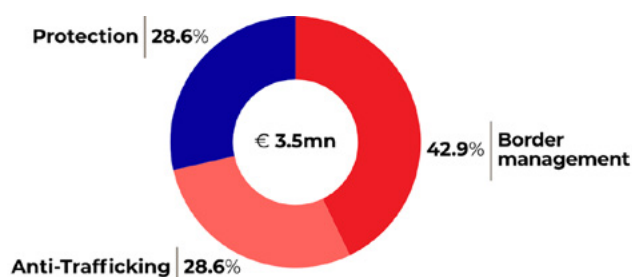


FIGURE 20. Allocations by Categories of Intervention in North Africa (€67 million) 2020-2025

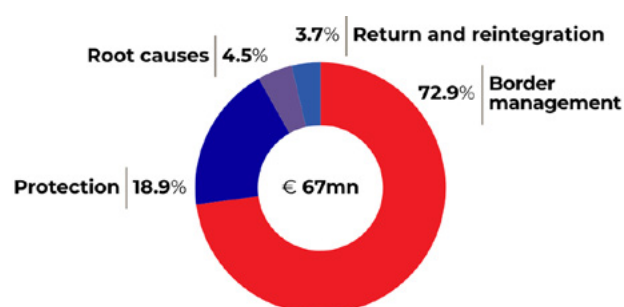


FIGURE 21. Allocations by Categories of Intervention in Asia and the Pacific (€9,5 million) 2020-2025

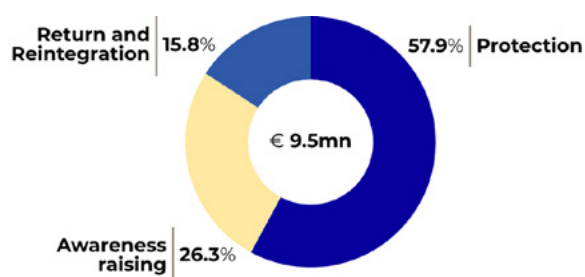
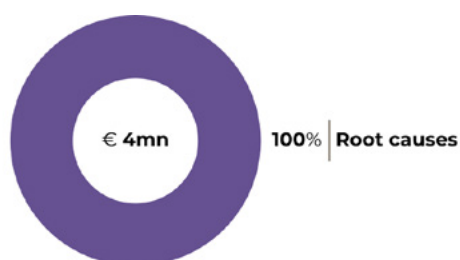


FIGURE 22. Allocations by Categories of Intervention in Eastern Europe (€3 million) 2020-2025



FIGURE 23. Allocations by Categories of Intervention in the Western Balkans and Türkiye (€4 million) 2020-2025



Note: elaboration of project documents obtained through FOI requests, reworked from the ActionAid Italy observatory The Big Wall.

Chapter 2371 – Italian Ministry of Interior (MOI)

In quantitative terms, the resources allocated under Chapter 2371 are considerably more limited, with annual appropriations remaining

broadly stable at around €9 million between 2015 and 2024. However, from 2015 onward, annual allocations under this chapter increased dramatically, from about €500,000 in 2014 to approximately €23 million in 2025 (Table 7). Beyond

the significant increase in resources, particularly over the past ten years, what is noteworthy is the Ministry of the Interior's increasingly active role in development cooperation aimed at achieving migration management objectives. Chapter 2371 provides a particularly clear example of how the Ministry's involvement in external cooperation has progressively extended to interventions aimed at migration containment in third countries.

In 2020–2025, funding under Chapter 2371 can be divided into three main streams.

The first stream – and arguably the most distinctive one – consists of cooperation projects implemented by Italian CSOs and local authorities selected through public calls (RELINT 2019 and RELINT 2024). These interventions primarily address the root causes of migration and raise awareness of the risks associated with so-called irregular migration. Taken together, the two calls allocated approximately €59 million to 46 projects: 18 projects selected through the 2019 call for approximately €20 million⁹⁶ and 28 projects selected through the 2024 call for a further €39 million.⁹⁷ While civil society organisations have also been involved in implementing other Italian external migration instruments, Chapter 2371 stands out for providing a recurring channel through which Italian CSOs and local authorities can directly access resources for migration and development cooperation with third countries.

Both calls reveal geographical continuity, alongside some diversification over time. Sub-Saharan Africa remains the priority region, accounting for approximately 76% of resources allocated in 2019 and 82% in 2024. All six countries funded under the 2019 call – Ethiopia,

Tunisia, Côte d'Ivoire, Mali, Niger and Nigeria – also feature in the 2024 allocation, while the latter expands the geographical coverage to Burkina Faso, Cameroon and Egypt. Ethiopia remains the largest recipient across both calls, although its relative weight declines, while funding becomes more evenly distributed among a broader group of countries in 2024.

The most significant concern regards the inclusion of awareness-raising activities on the risks of so-called irregular migration as a mandatory project component. Beyond the fact that there is limited evidence on the effectiveness of these interventions (see Chapter 4.2), development cooperation should also pursue a different objective. Rather than treating migration as a problem to be contained, programmes aimed at addressing its root causes could place greater emphasis on the developmental potential of human mobility. From this perspective, expanding safe and regular pathways would not only provide alternatives to irregular migration but also strengthen migration's positive contribution to the development of countries of origin through skills, remittances, and transnational links. The dangers associated with the main migration routes, whether across deserts, mountains, or the Mediterranean, largely stem from the absence of safe and accessible alternatives. This raises an important policy question. While considerable resources are devoted to discouraging so-called irregular migration and warning prospective migrants about its risks, far less attention goes to expanding safe, regular pathways that could provide a viable alternative. Without such opportunities, information campaigns alone are unlikely to reduce reliance on dangerous journeys.

⁹⁶ MININT_RELINT 2019. Call for proposals for cooperation and assistance projects with third countries in the field of immigration and asylum, 2019, Ministry of the Interior. <https://www.interno.gov.it/it/amministrazione-trasparente/bandi-gara-e-contratti/procedure-fino-31122023/atti-amministrazioni-aggiudicatrici-e-enti-aggiudicatori-distintamente-ogni-procedura/bandi-gara-e-contratti/amministrazione-trasparentebandi-gara-e-contrattiprocedure-fino-3426>

⁹⁷ Public Call for Proposals “RELINT 2024 – Selection Procedure for Projects to Be Funded by the Ministry of the Interior – Department for Civil Liberties and Immigration” for the submission of project proposals to be implemented in Africa. 2024. Ministry of the Interior. <https://www.interno.gov.it/it/amministrazione-trasparente/bandi-gara-e-contratti/avviso-pubblico-relint-2024-procedura-selettiva-progetti-finanziare-parte-ministero-dellinterno-dipartimento-liberta-civili-e-immigrazione-presentazione-proposte-progettuali-realizzare-africa>

TABLE 7 – Intervention financed by Chapter 2371, 2019-2025 (Million €)

Year	Intervention	Recipient	Amount
2019	Public call 2019 “RELINT19”	CSO and local authorities grantees	20.059.617,95
2021	Specialist support services to the International Relations Office II for the monitoring and administrative-accounting management of the Regional Development and Protection Programme for North Africa (RDPP NA) and the projects selected under call MININTRELINT2019	Invitalia	484.449,10
2021	Informing on risks of irregular migration and promoting safe migration through the strengthening of community engagement in transit countries along central and western Mediterranean routes	IOM	1.410.054,13
2024	Public call 2024 "RELINT24"	CSO grantees	39.147.596,53
2024	Ministry of Interior contribution to DGNEAR – MPRR-NA Programme	DGNEAR	7.000.000,00
2024	Ministry of Interior contribution to DGNEAR – THAMM+ Programme	DGNEAR	400.000,00
2024	Support to protection mechanisms for the application of the Protocol between the Government of the Italian Republic and the Council of Ministers of the Republic of Albania	IOM	718.317,00
2025	Supplementary act to the Agreement for specialist support services to the International Relations Office for the monitoring and financial-administrative management of the Regional Development and Protection Programme for North Africa (RDPP NA)	Invitalia	486.417,40
Totale			€61.932.452,15

Source: Ministry of the Interior – Chapter 2371. Reworked from the ActionAid Italy observatory *The Big Wall*.

The second stream consists of direct awards to IOM: €1,4 million for the campaign informing about the risks of irregular migration along the Central and Western Mediterranean routes, and €718,317 for monitoring the implementation of the Italy–Albania Protocol. Here, too, as with the other funding instruments analysed, IOM emerges as a privileged interlocutor of the Italian system. As explained above, such direct award procedures create the risk that international organisations may end up supporting and legitimising Italian border

externalisation policies. This concern is reflected here as well, especially in politically sensitive activities, such as monitoring the controversial Italy–Albania Protocol, which is entrusted to IOM.

The remaining resources allocated under Chapter 2371 include contributions to European programmes and funding for administrative and monitoring activities. Italy contributed €7 million to the *Migrant Protection, Return and Reintegration programme in Northern Africa* (MPRR-NA)⁹⁸

⁹⁸ *Migrant Protection, Return and Reintegration in North Africa (MPRR-NA)*. (n.d.). IOM. https://www.iom.int/fr/procurement/ex-post-publication-information-eu-funds?field_eu_reference_number_value=&field_iom_mission_value=&field_programme_end_date_value%5Bvalue%5D=&field_programme_start_date_value%5Bvalue%5D=&order=field_total_contribution&sort=asc&title=&page=4

managed by DG NEAR, and €400,000 to the THAMM+ programme, which promotes regular labour mobility pathways between Italy, Morocco and Tunisia.⁹⁹ In 2025, a further €970,866 was allocated for the monitoring and financial-administrative management of the *Regional Development and Protection Programme for*

North Africa (RDPP-NA)¹⁰⁰ and of projects selected under the 2019 RELINT call. Together, these allocations amount to approximately €8.4 million and complement the resources channelled through the two RELINT calls and the direct awards to IOM described above.

⁹⁹ THAMM Plus towards a holistic approach to labour migration governance and labour mobility in Italy and North Africa. (n.d.). IOM. <https://italy.iom.int/sites/g/files/tmzbd11096/files/2021-12/2026/THAMM/1-il-progetto-thamm-plus-e-come-partecipare.pdf>

¹⁰⁰ RDPP North Africa. (2025, June 9). *Regional Development and Protection Programme for North Africa*. RDPP North Africa - Regional Development and Protection Programme for North Africa. <https://rdppna.interno.gov.it/>

4 - HOW HAVE THE FUNDS BEEN ALLOCATED SO FAR? A QUALITATIVE ANALYSIS

This section analyses programmes funded by the EU and Italy in North Africa and Sub-Saharan Africa across the main categories of intervention: migration and border management; return and reintegration; protection and forced displacement; and root causes. Based on a review of several programmes' documentation, this section offers a panoramic view of the types of activities and objectives covered by these interventions, in light of the regional strategies and frameworks in which the projects are embedded.

The projects are examined based on their alignment with ODA requirements and policy coherence with development objectives. This approach makes it possible to identify both potential shortcomings against OECD-DAC criteria and forms of aid diversion that arise even where the expenditure is formally eligible as ODA. Indeed, as previously discussed, aid diversion concerns both the financing of activities that evidently fall outside the parameters of ODA eligibility and the gradual shift in development cooperation priorities towards migration control objectives.

From this perspective, the analysis considers how individual programmes fit within broader strategies in which donors' migration objectives shape projects' design and implementation, potentially creating tensions with partner-country development priorities, human rights protection, and local ownership. The last part of this chapter will also analyse how conditionality can further reinforce these dynamics, by explicitly or implicitly linking access to funding to partner governments' cooperation on border control, returns and readmission.

4.1 - Migration, border management and returns: a deviation of ODA for deterrence

4.1.1 - Migration and Border Management

Migration and border management are among the areas in which the distinction between development cooperation and migration-control objectives is particularly difficult to assess. OECD-DAC rules do not exclude migration-management activities from ODA. Eligibility depends largely on the intervention's primary purpose and, in some cases, on the specific activities being financed. Measures aimed at protecting migrants, combating trafficking, supporting civilian governance or covering additional costs of genuine Search and Rescue operations may qualify as ODA. By contrast, activities whose primary purpose is to restrict migration to the donor country, strengthen border surveillance, or support interception and return operations fall outside the scope of development assistance. This distinction is especially relevant for the programmes examined in this section, which frequently combine activities with different functions within the same intervention. Equipment, training, surveillance capacity, Search and Rescue, counter-smuggling measures and institutional support may all appear under a common migration-management framework. However, the available documentation does not always make it possible to determine how individual components were assessed for ODA eligibility. Therefore, the analysis focuses on the relationship between the stated objectives of these programmes, the activities they finance and the OECD-DAC requirement that development remain their primary purpose.

European migration and border management programmes – North Africa

Migration and border management programmes are those in which aid diversion is more evident and in which criticisms and controversies have historically emerged more prominently. In its 2025 review of the activities reported under purpose code 15190, the OECD acknowledges that most activities for which the ODA-eligibility was questioned relate to the area of border management, especially when members are not sufficiently specific about the activity's primary goal, as well as the individual components conducted within an activity.¹⁰¹ Establishing an action's primary goal is crucial to assessing its compliance with ODA eligibility rules. The primary goal is fundamental to the activity's design and expected impact, and can be identified by asking: would the activity have been undertaken without this goal?

For migration and border management programmes, Principle 6 of the guidelines (Annex 1) clarifies that activities whose primary goal is to curb migration to Europe by intercepting and returning migrants are not ODA-eligible. Criterion 4 further clarifies that establishing the primary goal of the action in this field is crucial to assess whether an activity can be considered ODA or not, listing several examples of non-ODA-eligible actions, such as:

- » Activities that support border authorities with the main objective of restricting migration to the provider country.
- » Border control projects like border checks and border surveillance activities for the purpose of constraining migration or that are directly related to the army or entail military-type border and territorial surveillance

- » Training and capacity building for border guards and border patrol administration

Another important element concerns the support provided for Search and Rescue activities. Criterion 4 clarifies that if rescue is the primary goal of an action, costs beyond the Coast Guard's regular running costs that specifically relate to rescue activities can be counted as ODA. However, if the main purpose of the maritime activity is to patrol the waters and protect borders, expenses incurred for rescue at sea cannot be counted as ODA. Similarly, counter-smuggling and anti-trafficking activities can be counted as ODA when their primary goal is to protect migrants from abuse, but not for actions that form part of wider border control and surveillance activities.

With this in mind, many interventions that have, over the years, contributed to the development, equipment, and reinforcement of the Coast Guard in North African countries such as Libya and Tunisia emerge as key examples of ODA diversion. These programmes are largely motivated by provider countries' political interests in stemming migratory flows to Europe, despite abundant evidence of human rights violations against migrants and support for actors who are complicit in those violations.¹⁰²

However, all NDICI-GE actions reviewed in this analysis were tagged as ODA-eligible. A total of ten migration and border management actions were reviewed, and of these:

- » Seven of them were reported as 100% ODA-eligible under the code 15190 – Facilitation of orderly, safe, regular and responsible migration and mobility; of these, two were also partially tagged with the code 15210 – Security System Management and Reform¹⁰³ (see Annex 3), as detailed below

¹⁰¹ DAC Working Party on Development Finance Statistics, Update to the review of the activities reported under Purpose Code 15190 on the Facilitation of Orderly, Safe, Regular and Responsible Migration and Mobility. In *OECD* (DCD/DAC/STAT(2025)9/FINAL, 2025. [https://one.oecd.org/document/DCD/DAC/STAT\(2025\)9/FINAL/en/pdf](https://one.oecd.org/document/DCD/DAC/STAT(2025)9/FINAL/en/pdf)

¹⁰² Greens/EFA (in collaboration with ActionAid, Arci, EuroMed Rights, Profundo) Beyond borders, beyond boundaries, a critical analysis of EU financial support for border control in Tunisia and Libya, 2023. <https://www.greens-efa.eu/en/article/study/beyond-borders-beyond-boundaries>; Oxfam International, From Development to Deterrence? Migration spending under the EU Neighbourhood Development and International Cooperation Instrument (NDICI), Oxfam Policy & Practice, 2023, <https://policy-practice.oxfam.org/resources/from-development-to-deterrence-migration-spending-under-the-eu-neighbourhood-de-621536/>

¹⁰³ The code 15210 may support security-sector activities that strengthen transparency, accountability and civilian oversight. Eligible assistance includes support for civil society and institutions that monitor the security system and promote democratic governance. Technical assistance may also support security-sector reform, provided it promotes human rights, transparency and inclusive governance.

- » Two of them were reported as 510 - General budget support¹⁰⁴
- » The Action Document for 2023 is the only one that is reported as ODA eligible for 50,5%. This Action Document is different from the others because it was approved through an expedited procedure, resulting in a broad Action Document that covers multiple individual actions.¹⁰⁵ The Action Document lists several areas of intervention and corresponding DAC codes, but it is not possible to determine which parts are considered *dacable* and which are not. The review of OECD guidelines taking place at the same time could explain why the assignment of DAC codes and their

percentages in this Action Document differ from those in other years.¹⁰⁶

When looking at the Action adopted in 2024 – and therefore subject to the approved OECD guidelines on migration – similar patterns from previous years emerge. The action is called *Support to strengthening migration governance and management*.¹⁰⁷ It is implemented in Egypt, Libya, Morocco, Tunisia and Algeria with a budget of €86 million. The action is tagged as 100% ODA, under the codes 15190 (25%) and 15210 (75%) and has the following specific objectives and indicative activities:

TABLE 8. Support to strengthening migration governance and management (North Africa, 2024)

Specific objectives	Indicative activities
» North African countries have enhanced human rights-based border management which effectively counters migrant smuggling and trafficking in human beings, in compliance with international obligations and with a rights-based approach. » Mutual understanding on migration management is fostered in the Southern Neighbourhood.	» Training and capacity building of national authorities in several areas, from border control and surveillance, document inspection, language training, anti-trafficking and counter-smuggling, international human rights and humanitarian law and others » Delivery of new equipment and rehabilitation of existing equipment, including vessels and infrastructure, communication equipment, advanced surveillance tools, specialised vehicles, police data management equipment and others » Needs assessments, data gathering, analysis and development, dissemination and implementation of standard operating procedures in Search and Rescue » Support national law enforcement and judicial authorities and address gaps in identification, investigation and prosecution of criminal networks engaging in migrant smuggling and trafficking » Strengthen law enforcement and implementing partners' procedures on do no harm as well as national human rights monitoring and oversight mechanisms » Identification, assistance and support to victims of trafficking and vulnerable migrants, with a gender sensitive approach » Strategic dialogues and regional roundtables and high-level events for information sharing and coordination » Awareness raising, engagement and stabilisation of communities living in border areas and being potential targets of smuggling and trafficking networks

Source: European Commission, *Support to strengthening migration governance and management*. Publications Office of the European Commission, 2024

Support to defence ministries is eligible only as part of a national security-sector reform strategy; direct assistance to armed forces is excluded.

¹⁰⁴ Budget support refers to a funding modality through which EU funds are transferred directly to a partner country's treasury. Payments are made in tranches, once agreed conditions are met, and are spent through national budgets – not earmarked for individual projects.

¹⁰⁵ Greens/EFA (in collaboration with ActionAid, Arci, EuroMed Rights, Profundo) *Beyond borders, beyond boundaries, a critical analysis of EU financial support for border control in Tunisia and Libya*, 2023, <https://www.greens-efa.eu/en/article/study/beyond-borders-beyond-boundaries>

¹⁰⁶ Interview with representative of European Commission, DG MENA.

¹⁰⁷ European Commission, *Support to strengthening migration governance and management*. Publications Office of the European Commission, 2024. https://enlargement.ec.europa.eu/document/download/ee29079a-ccf9-4a76-9d1c-7ae3e69bc43e_en?filename=C_2024_7998_F1_ANNEX_EN_V2_P1_3737156.PDF

The problem analysis of the action clearly refers to *“Shortcomings in the technical and operational capacity of the national border management authorities (...) Lack of training and availability of adequate equipment are a limitation for the authorities to carry out search and rescue operations, effectively manage their land and maritime borders and prevent irregular departures”*.¹⁰⁸ The main stakeholders to be covered by the action include border guards, border police, migration management units, criminal investigation units, judicial police, and prosecutor’s offices. Other stakeholders identified include border communities, CSOs active in migration management and human rights and migrants.

This Action is the latest in a series of interventions that, over the years, have helped establish the system of interceptions, pullbacks, and violations that now dominates the Central Mediterranean. In 2021, 2022, and 2023, several Action documents were adopted addressing migration and border management in North Africa. They included specific objectives on the establishment of Training Academies and infrastructures for the Libyan and Tunisian Coast Guards, upgrading or establishing the Maritime Rescue Coordination Centre in Libya and Tunisia, completing the Tunisian integrated coastal surveillance system¹⁰⁹, enhancing the surveillance technical capacity of the Egyptian Coast Guard and Border Guard¹¹⁰, increasing operational cooperation between border management

authorities in North Africa and strengthening surveillance at selected border crossing points.¹¹¹

The Action adopted in 2024, while including stronger language on human rights compliance and respect for the do-no-harm approach, ultimately proposes the same core activities as in previous years. A key aspect is the misuse of Search and Rescue language. The list of indicative activities, in particular under *Output 1.1 - Improved technical capacities for border management and search and rescue operations* includes activities like the development of a SAR governance mechanism and Standard Operating Procedures, trainings in SAR, delivery and rehabilitation of border security infrastructure and *“Search and Rescue equipment such as vessels, advanced communication equipment (satellite phones, radios with long-range capabilities), handheld night vision devices and other advanced surveillance tools such as thermal and radar imagers, specialised vehicles suitable for SAR in the desert, essential lifesaving equipment, connection to relevant international databases (e.g. INTERPOL)”*.¹¹² Several actors have demonstrated over the years how the activities conducted in the Central Mediterranean by North African Coast Guards cannot qualify as Search and Rescue operations, not least for the repeated episodes of violence against migrants and humanitarian personnel at sea.¹¹³ In NDICI-GE programming documents, Search and Rescue language serves as a metaphor for the EU’s deterrence strategy in the Central Mediterranean, where border control,

¹⁰⁸ Ibidem.

¹⁰⁹ European Commission, *Action Document for EU Support to Border Management Institutions in Libya and Tunisia*. Publications Office of the European Commission, 2021. https://enlargement.ec.europa.eu/document/download/4c24c16c-1e55-47bd-a9fb-d4e6a37cbbae_en?filename=C_2021_9615_F1_ANNEX_EN_V3_P1_1639231.PDF

¹¹⁰ European Commission, *Action Document for strengthening the operational capacity of the Egyptian Coast Guard and Egyptian Border Guards to manage migration flows through effective border surveillance and search and rescue at land and sea*. Publications Office of the European Commission, 2022. https://enlargement.ec.europa.eu/document/download/95145364-3086-43fc-8e26-2719e311bad6_en?filename=C_2022_6933_F1_ANNEX_EN_V1_P1_2132169.PDF

¹¹¹ European Commission, *Action Document for Support to Cross-Border Cooperation and Integrated Border Management in North Africa*. Publications Office of the European Commission, 2023. https://enlargement.ec.europa.eu/document/download/968f77a6-c301-43ef-a495-c29535ce5869_en?filename=C_2022_6933_F1_ANNEX_EN_V2_P1_2132109.PDF

¹¹² European Commission, *Support to strengthening migration governance and management*. Publications Office of the European Commission, 2024. https://enlargement.ec.europa.eu/document/download/ee29079a-ccf9-4a76-9d1c-7ae3e69bc43e_en?filename=C_2024_7998_F1_ANNEX_EN_V2_P1_3737156.PDF

¹¹³ In August 2025, the so-called Libyan Coast Guard [attacked](#) the rescue ship Ocean Viking, firing hundreds of shots over 20 minutes. Systematic abuses and violations against migrants have been monitored and reported over the years by several human rights organisations, including UN bodies. See Office of the United Nations High Commissioner for Human Rights (OHCHR), *Business as usual*: Human rights violations and abuses against migrants and asylum-seekers at land borders in North and West Africa, 2025, <https://www.ohchr.org/en/documents/reports/business-usual-human-rights-violations-and-abuses-against-migrants-asylum-seekers>. See also: Amnesty International, Tunisia: “Nobody hears you when you scream”: Dangerous shift in Tunisia’s migration policy (2025), Index No. MDE 30/0180/2025, 6 November 2025, <https://www.amnesty.org/en/documents/mde30/0180/2025/en/>

surveillance, and curbing migratory flows are the primary goals. Similarly, the Action includes several mentions of “*enhancing a human-rights-based border management*”.¹¹⁴ This is translated into indicators like the number of Search and Rescue operations supported, the number of items of equipment delivered, and the number of migrants intercepted/rescued through SAR operations – all indicators that measure the amount of interceptions and support to the system of pullbacks in the Central Mediterranean, rather than measuring improved human rights compliance. For that, other indicators would be more relevant, such as tracking the number of reported human rights violations or deaths and disappearances at land and sea borders. Human rights training is another core activity in this Action document and in similar ones from previous years. While training alone does not guarantee compliance with human rights, NDICI-GE actions show an overreliance on human rights training to mitigate risks arising from border control operations and a naive implementation of a do-no-harm approach.¹¹⁵

Since the adoption of the OECD migration guidelines in 2022, the OECD purpose codes used by the European Commission for border management projects in North Africa have shifted. Before 2023, all these projects were tagged as 100% ODA under the purpose code 15190 – Facilitation of orderly, safe, regular and responsible migration and mobility. Starting in 2023, the purpose code 15210 – Security System Management and Reform was used increasingly. However, changing the reporting code does not alter the substance of the actions supported, which still appear to fall outside the parameters of what ODA can fund. First, the adopted OECD migration guidelines apply to all migration-related activities, regardless of the

assigned purpose code, and set clear boundaries on what counts as ODA in the context of border management. Secondly, and most importantly, specific guidelines apply for the purpose code 15210 – *Security system management and reform*, which covers civilian-led security sector reform, including technical assistance to strengthen good governance, transparency, accountability, human rights, gender sensitivity, and civilian oversight. It also includes support for transparent and democratic management of security budgets, while excluding security sector assistance activities like transfers of military materiel, combat training, joint exercises, and military education for foreign military officers. In this sense, the activities foreseen do not seem to align with the purpose of code 15210, as they involve the provision of border control and surveillance equipment to the Coast Guards, and do not aim at strengthening the civilian oversight of these actors – also bearing in mind that the space for civilian monitoring of military bodies in Libya or Tunisia is absent at the moment. Furthermore, the problem analysis acknowledges the risk that institutional partners in North Africa cooperate with armed groups, leading to the “*unintended empowerment of these groups or specific factions*”.¹¹⁶ The risk analysis further notes that EU funds could support individuals under sanctions or be used to commit human rights abuses, undermining the alignment and eligibility of this action under the purpose codes for peace and security.

In 2025, the same programme was renewed with a budget of €140 million and running until 2027. The overall objectives and activities remain the same, and so does the programme’s *dacability*, tagged as 80% under purpose code 15210 and 20% under code 15190.¹¹⁷

¹¹⁴ European Commission, *Support to strengthening migration governance and management*. Publications Office of the European Commission, 2024. https://enlargement.ec.europa.eu/document/download/ee29079a-ccf9-4a76-9d1c-7ae3e69bc43e_en?filename=C_2024_7998_F1_ANNEX_EN_V2_P1_3737156.PDF

¹¹⁵ Greens/EFA (in collaboration with ActionAid, Arci, EuroMed Rights, Profundo) *Beyond borders, beyond boundaries, a critical analysis of EU financial support for border control in Tunisia and Libya*, 2023. <https://www.greens-efa.eu/en/article/study/beyond-borders-beyond-boundaries>;

¹¹⁶ European Commission, *Support to strengthening migration governance and management*. Publications Office of the European Commission, 2024. https://enlargement.ec.europa.eu/document/download/ee29079a-ccf9-4a76-9d1c-7ae3e69bc43e_en?filename=C_2024_7998_F1_ANNEX_EN_V2_P1_3737156.PDF

¹¹⁷ Ibidem.

Italian migration and border management programmes – North Africa

Unlike the NDICI-GE programmes analysed above, for which the European Commission provides information on the share of each programme reported as ODA, the information obtained through FOI requests concerning the Incentive Fund refers only to the annual amount of the Fund reported as ODA-eligible. It is therefore not possible to determine whether, or to what extent, expenditure under individual projects was subsequently reported as ODA. This is particularly relevant for migration interventions, since OECD-DAC rules allow certain activities in areas such as migration management and border management to qualify as ODA under specific conditions. The analysis below should therefore not be read as an assessment of a specific activity known to have been reported as ODA, but rather as an examination of a project financed through a Fund whose resources have, at least in part, been reported as ODA-eligible.

Against this background, the programme *Support to Tunisia's Border Control and Management of Migration Flows*, formally launched in December

2020 and subsequently financed through the Incentive Fund, is particularly relevant. From 2022 onwards, allocations to the programme account for approximately 45% of the Fund's total resources.

The stated overall objective is to support the Tunisian authorities in border control and the management of migration flows, through material reinforcement of interception capabilities. The core of the intervention consists of maintaining six high-speed patrol boats belonging to the Tunisian National Guard and supplying a wide range of equipment, including 4x4 off-road vehicles, quad bikes, minibuses, and engines for the patrol boats. With an initial budget of €8 million allocated in 2020, the project has since become a main source of funding for the gradual enforcement of the Tunisian border, reaching a total of €39 million distributed across seven funding rounds between 2020 and 2025. The gradual increase in the allocated amount and the project's duration can be explained only in part by the issues identified in the interim reports, ranging from delays in the project's launch and political coordination to difficulties in procurement processes.

TABLE 9. UNOPS – Support to Tunisia's Border Control and Management of Migration Flows¹¹⁸

¹¹⁸ The Big Wall, ActionAid Italy, [Support to Tunisia's Border Control and Management of Migration Flows](#), 2020

Specific objectives	Indicative activities
» Provide maintenance services for six fast patrol boats over a period of four years in support of the Tunisian Maritime National Guard, covering ordinary and extraordinary maintenance, and the supply of spare parts. » Procure and supply equipment and supplies needed by the Tunisian Authorities, for a cumulative value of €23 million » Strengthen the capacities of the Tunisian Authorities with respect to human rights, including through cyber-criminality and technical training on the use of the vehicles, engines and equipment procured.	» Procurement of a four-year maintenance contract for six patrol boats of the Tunisian Maritime National Guard, structured in one lot each for ordinary and extraordinary maintenance, and spare-parts supply. » Procurement of equipment and supplies specified by the Tunisian Authorities according to their evolving needs, delivered through successive lots agreed with the Italian Ministry of Foreign Affairs (MFA). » Provision of human rights-related training to the beneficiaries of the boat-maintenance and equipment-procurement activities. » Cyber-criminality and technical training on the use of the vehicles, engines and equipment procured. » “Definition of Needs” phase: coordination between the Ministry of Interior of Tunisia and the Italian MFA to define detailed technical needs and bills of quantities ahead of each procurement phase.

Source: elaboration of project documents obtained through FOI requests, reworked from the ActionAid Italy Observatory The Big Wall.

The project also shows how border externalisation policies affect Tunisia’s regulatory frameworks. One of the critical issues mentioned in the second interim report from 2022 relates to the fact that *“the procurement of personnel vehicles was put on hold pending a waiver from the 2020 Tunisian finance legislation which stipulates the payment of customs duties on vehicles donated to the government of Tunisia”*.¹¹⁹ The Tunisian Budget Law removed this requirement in 2022, exempting vehicles donated to the Tunisian government from customs duties and simplifying their transfer through a substantial amendment to Tunisian legislation. In the initial phase, UNOPS needed to assess the risk that Tunisian authorities would *“violate international migration and human rights conventions”*.¹²⁰ The assessment was not made public, but it appears to have led to only limited corrective measures: in response to the reputational risks repeatedly identified in the project documentation, a mitigation strategy was introduced requiring human rights training for the Tunisian authorities. According to the project documents, the training was to be outsourced to a specialised private contractor,

whose identity could not be established from the available documentation. Thus, while the first two years of the project focused entirely on providing equipment and maintaining patrol boats, from 2023 onwards the intervention was complemented by a mandatory human rights training component.

These examples show that the logic underpinning these interventions is deterrence and prevention of arrivals. In the *Casebook on activities in the field of migration*,¹²¹ the OECD provides several examples of ODA- and non-ODA-eligible programmes in the area of border management. Amongst those deemed non-eligible, there is a specific example of a project funded by Italy to enhance the Tunisian Authorities’ capacity in border management and the fight against trafficking of human beings. The project is deemed non-ODA as *“It consists in providing technical support to the coast guards and institutions responsible for border management through provision of equipment and materials for direct fight against migrant trafficking, with the main aim to intercept migrants and restrict migration to Europe”*,¹²²

¹¹⁹ Ibidem.

¹²⁰ Ibidem.

¹²¹ Organisation for Economic Co-operation and Development (OECD), Development Assistance Committee (DAC). *ODA Casebook on Activities in the Field of Migration*. DCD/DAC/STAT(2023)34/FINAL. Paris: OECD, 2025, [https://one.oecd.org/document/DCD/DAC/STAT\(2023\)34/FINAL/en/pdf](https://one.oecd.org/document/DCD/DAC/STAT(2023)34/FINAL/en/pdf)

¹²² Ibidem.

which is explicitly excluded from ODA according to Principle 6 and Criterion 4 of the guidelines. In other similar examples, the OECD states that while more efficient migration management can have positive impacts and improve security in the recipient country and respond to mutual benefits, when the main purpose is still linked to donor countries' interests in decreasing arrivals and is not motivated by developmental goals, these cannot qualify as ODA. **Following this logic, the projects analysed above also seem to fall outside the scope of ODA, as they fund specific border control activities that build the infrastructure of interceptions and surveillance in the Central Mediterranean.**

European migration and border management programmes – Sub-Saharan Africa

Migration and border management programmes are not limited to transit countries along migratory

routes to Europe, such as North Africa, but also cover countries considered the main countries of origin of people coming to Europe, in what is called the 'route-based approach'. This is a key pattern of externalisation: pushing migration control and mobility containment as early as possible along the main migratory routes, to prevent mobility at the 'source'.

In Sub-Saharan Africa, the overall picture can differ slightly from that of North Africa, as border management is not the primary area of intervention funded, and activities in this category can encompass a wider range of actions geared more toward anti-trafficking, counter-smuggling, and migration governance more broadly. However, establishing their primary goals remains crucial to establish ODA eligibility. For instance, the action *Managing migration better in Western Africa*¹²³ adopted by the European Commission in 2024 for Sub-Saharan Africa, is divided into two main objectives:

TABLE 10. Managing migration better in Western Africa (West Africa, 2024)

¹²³ European Commission, Managing migration better in Western Africa. DG INTPA, 2024. https://international-partnerships.ec.europa.eu/countries/sub-saharan-africa_en

Specific objectives	Indicative activities
» contribute to the sustainable reintegration of all types of returnees through the development of inclusive nationally owned referral systems and social cohesion measures in receiving communities » improve capacities to prevent and combat trafficking in human beings and smuggling of migrants in the Western African region as well as to protect and assist the victims of trafficking and migrants in vulnerable situations by strengthening capacities (prevention, prosecution and protection) at the national level, and developing/supporting transnational cooperation mechanisms to fight those crimes	» assessments and analyses of migratory flows, existing capacities and gaps in the area of combating trafficking in human beings, smuggling, maritime border management and Search and Rescue operations at sea, and victims' protection » improved data collection on trafficking in human beings and smuggling of migrants » support the revision and development of national policy frameworks related to trafficking in human beings and smuggling of migrants » build capacity of national actors to detect, investigate, prosecute and prevent trafficking in human beings and smuggling of migrants and increase cooperation between law enforcement and judicial authorities » capacity building of national authorities on maritime border management to fight smuggling and trafficking and improve Search and Rescue capacities at sea » enhance protection for victims of trafficking in human beings and smuggled migrants » transnational coordination between border security authorities, including through joint exercises and operations, particularly as concerns search and rescue at sea.

Source: European Commission, *Managing Migration Better in Western Africa*. Publications Office of the European Commission, 2024

Although the first objective of reintegration receives most of the funding (€85 million out of €100 million), the action is still classified under migration and border management because the second component focuses on combating trafficking and smuggling.

While activities aimed at strengthening the protection of victims of trafficking and smuggling are eligible as ODA, other activities listed here may deviate from the ODA parameters based on their primary purpose. For instance, as mentioned above, building the capacity of national authorities in maritime border management and SAR may qualify as ODA only for additional costs associated with Coast Guard rescue activities. From the available information, it is not possible to determine how the funds will be used in this regard. Still, the context analysis explicitly links the expansion of transnational trafficking and smuggling networks to the increase in irregular border crossings at the EU's external borders. In particular, the context analysis mentions increased arrivals in 2023 along the Central Mediterranean and Atlantic routes of nationals

from West African countries such as Senegal, Guinea, Ivory Coast, Gambia, and Mali, thereby linking the border management activities to be conducted in West Africa to provider countries' interest in reducing arrivals to Europe. In this sense, it can be questioned how the action *Managing migration better in Western Africa* can be 100% *dacable* under code 15190, as at least part of the activities seem to respond to the primary goal of restricting migratory flows to provider countries.

Italian migration and border management programmes – Sub-Saharan Africa

Building on the experience of the *Support to Tunisia's Border Control and Management of Migration Flows* project, the Commission launched a similar intervention in Côte d'Ivoire in 2024. As in the Tunisian case, the project is financed through the Incentive Fund for Return Policy. The project, entitled *Support to Côte d'Ivoire's Border Control and Management of*

Migration Flows, entrusts UNOPS with procuring border-control equipment for the Ivorian Ministry of the Interior, along with related commissioning and capacity-building activities, on behalf of Italy. Similar concerns to those identified in the Tunisian case also emerge here, particularly as the project documentation acknowledges a risk that the Ivorian authorities may have “a tendency of violating international migration and human rights statutes”.¹²⁴ As with the intervention examined

above, the project explicitly aims to strengthen border-control capacity in a country described as both a destination and a transit hub for migration in West Africa. This raises questions about the compatibility of at least some of its activities with OECD-DAC eligibility criteria, particularly given the close similarities with the intervention in Tunisia, which the OECD has itself cited as an example of non-ODA-eligible expenditure.

TABLE 11. Support to Côte d'Ivoire's Border Control and Management of Migration Flows¹²⁵

Specific objectives	Indicative activities
» Deliver border control management equipment to Côte d'Ivoire's national authorities.	» “Definition of Needs” phase: coordination between the Italian MFA and the Ivorian Ministry of Interior to determine detailed technical needs and the bill of quantities ahead of procurement
» Commission the equipment and hand it over to the beneficiary (Ministry of Interior).	» Procurement of diverse equipment and supplies – solicitation, evaluation, award and management of supplier contracts – for a lump sum of approximately €1,200,000.
» Carry out capacity-building activities to strengthen the operators' capacity and ensure the long-term sustainability of the equipment procured.	» Logistics, delivery and handover of the assets to the beneficiary.
	» Commissioning of the equipment and provision of training to the operators to ensure its sustainable use.
	» Human rights risk assessment and application of UNOPS' Human Rights Due Diligence Policy to the list of equipment to be procured.

Source: elaboration of project documents obtained through FOI requests, reworked from the ActionAid Italy Observatory *The Big Wall*.

Migration and border management is therefore the area of intervention where aid diversion seems more evident, as the objectives of preventing arrivals, conducting interceptions, and exercising border control are central – especially in key countries along migratory routes. Given that this category of expenses is the third-largest by funding allocation under the NDICI-GE migration and forced displacement target globally, and the largest in North Africa, it is extremely concerning that such a significant share of the EU development cooperation budget does not ultimately contribute to local development. The same holds at the Italian level, where border

control appears across all funding instruments analysed, despite their full ODA eligibility under the Budget Law, and, in particular, in the Incentive Fund for Return Policies, where it is the dominant item.

4.1.2 - Return and reintegration

Over the last two decades, return policies have gained importance in the external dimension of migration.¹²⁶ Although they have long formed part of the EU *acquis* on migration and asylum,¹²⁷ their implementation has continued to remain relatively

¹²⁴ The Big Wall, ActionAid Italy, [Support to Côte d'Ivoire's Border Control and Management of Migration Flows](#), 2024

¹²⁵ Ibidem.

¹²⁶ Zana Vathi, Russell King and Barak Kalir, Editorial Introduction: The Shifting Geopolitics of Return Migration and Reintegration, *Journal of International Migration and Integration*, 24(Suppl. 2), 2023, pp. S369-S385.

¹²⁷ Directive 2008/115/EC of the European Parliament and of the Council of 16 December 2008 on common standards and procedures in

low. European institutions have responded by investing more in cooperation with countries of origin and transit to make return procedures more effective.¹²⁸

2015 marks an important turning point. With the *European Agenda on Migration*, strengthening return policy and cooperation with third countries became an explicit component of EU external action.¹²⁹ This approach was consolidated in the *New Pact on Migration and Asylum* and, more recently, in the proposal to reform the European return system. Over time, return has therefore not only remained an instrument of internal migration policy but has also become an axis of the EU's relations with third countries. This evolution has been accompanied by a progressive expansion of the financial instruments used to support cooperation on migration.¹³⁰

Alongside the strengthening of return policies, development cooperation has financed Assisted Voluntary Return and Reintegration (AVRR) programmes and Voluntary Humanitarian Return (VHR) programmes.¹³¹ An increasing share of EU and national ODA resources has been allocated to return and reintegration assistance in countries of origin and transit, with implementation largely

entrusted to the IOM.¹³² Italy has followed a similar trajectory by progressively allocating part of its cooperation resources to finance return and reintegration programmes. This choice is particularly evident in Libya, where the Africa Fund initially supported interventions and the Migration Fund later took over. Return has thus become one of the areas where the interplay between development cooperation and Italian migration policy is particularly evident, including in resource allocation.

These interventions focus primarily on transit countries and along the main African migration routes. This is also why they have gained increasing importance over time within European migration cooperation. A key example is the *EU-IOM Joint Initiative for Migrant Protection and Reintegration*, financed through the EUTF. The programme operates at a regional scale and brings together, within the same framework, various activities: return assistance, support for economic, social, and psychosocial reintegration, institutional capacity-building, and data collection.¹³³

As these programmes have expanded, so too has the debate over their nature and the conditions under which they are implemented. From the

Member States for returning illegally staying third-country nationals. <https://eur-lex.europa.eu/eli/dir/2008/115/oj/eng>

¹²⁸ Zana Vathi, Russell King and Barak Kalir, Editorial Introduction: The Shifting Geopolitics of Return Migration and Reintegration, *Journal of International Migration and Integration*, 24(Suppl. 2), 2023. https://ideas.repec.org/a/spr/joimai/v24y2023i2d10.1007_s12134-022-00974-x.html

¹²⁹ Natalia Banulescu-Bogdan, Meghan Benton and Susan Fratzke, Countries Are Pushing Borders Outward to Expand Deterrence and Protection Alike, *Migration Information Source*, Migration Policy Institute, 18 June 2026. <https://www.migrationpolicy.org/journal/feature/countries-are-pushing-borders-outward-expand-deterrence-and-protection-alike>

¹³⁰ On the evolution of the European regulatory framework on return and repatriation, see in particular: European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, *A European Agenda on Migration*, COM(2015) 240 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52015DC0240>; European Commission, EU Action Plan on Return, COM(2015) 453 final; European Commission, Renewed Action Plan on Return, COM(2017) 200 final; European Commission, Communication on Enhancing Cooperation on Return and Readmission as Part of a Fair, Effective and Comprehensive EU Migration Policy, COM(2021) 56 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52015DC0453>; European Commission, A New Pact on Migration and Asylum, COM(2020) 609 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52020DC0609>; European Commission, EU Strategy on Voluntary Return and Reintegration, COM(2021) 120 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52021DC0120>; European Parliament, Legislative Resolution of 17 June 2026 on the Proposal for a Regulation Establishing a Common System for the Return of Third-Country Nationals Staying Illegally in the Union and Repealing Directive 2008/115/EC (2025/0059(COD)), P10_TA(2026), 17 June 2026, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=ep:P10_TA%282026%290207

¹³¹ Voluntary Humanitarian Return (VHR) is a measure introduced by the International Organisation for Migration (IOM) specifically for the Libyan context, characterised by the integration of a humanitarian component into the project, alongside the technical support provided to the authorities in specialised search and rescue operations at sea (*Search and Rescue*, SAR). VHR programmes are aimed at assisting migrants, refugees, and asylum seekers rescued at sea, detained in detention centres, or stranded in Libya and, where deemed necessary, may be accompanied by socioeconomic reintegration interventions in countries of origin.

¹³² Gökalp Aras, N. E. and Yüksel, U. (2026). The Financialisation of the EU Governance of Return and Readmission, WP9 Concept Note on the Policy and Financial Dimension of Returns and Readmissions in GAPs Working paper 2026/07. <https://www.returnmigration.eu/wp-series/financialisation-eu-governance-return-readmission>

¹³³ International Organisation for Migration (IOM), Final Evaluation of the EU-IOM Joint Initiative for Migrant Protection and Reintegration in North Africa, 2024. https://evaluation.iom.int/sites/g/files/tmzbd115/files/docs/resources/Final%20evaluation%20report%20JI-NA.pdf?utm_source

perspective of donor countries and the IOM, assisted voluntary return is based on informed consent, respect for human dignity, and the potential to develop sustainable reintegration pathways. Several analyses, however, have challenged this interpretation, arguing that such programmes have now become an integral part of European strategies for the externalisation of borders and the containment of mobility.¹³⁴

The main issue concerns precisely the voluntariness of return. The absence of direct coercion is not, by itself, sufficient to make a choice voluntary. Rather, one must consider the real conditions under which that choice is made and, above all, what alternatives are available to those called upon to decide.¹³⁵

This issue is particularly significant in countries of transit such as Libya and Tunisia, where numerous reports document arbitrary detention, violence, and exploitation, together with severe restrictions on access to international protection and a scarcity of regular channels for mobility.¹³⁶ In such contexts, the decision to participate in a return programme may be strongly conditioned by these circumstances.

This grey area between choice and coercion has

fuelled the debate over the boundary between voluntary and forced return. Part of the literature proposes that they should not be regarded as two clearly distinct categories, but rather as practices situated along a continuum, in which assisted return may progressively include forms of forced return. From this perspective, concepts such as soft deportation and the deportation continuum have been used.¹³⁷ These concerns are particularly significant from a human rights protection perspective. Several UN bodies have clarified that a return is genuinely voluntary only when the decision is free and informed, does not result from coercion, whether direct or indirect, and the individual has effective alternatives to return, such as access to international protection or other forms of regular residence.¹³⁸ When these conditions are absent, particularly in transit contexts characterised by serious and systematic violations of fundamental rights, the voluntary nature of return becomes harder to sustain. In such cases, broader questions also arise concerning the compatibility of these programmes with the principle of non-refoulement¹³⁹ and with international protection obligations.¹⁴⁰

Alongside concerns about protecting rights, the literature also questions these programmes'

¹³⁴ Shoshana Fine and William Walters, No Place Like Home? The International Organisation for Migration and the New Political Imaginary of Deportation, *Journal of Ethnic and Migration Studies*, vol. 48, n. 11, 2022, https://www.researchgate.net/publication/355237922_No_place_like_home_The_International_Organisation_for_Migration_and_the_new_political_imaginary_of_deportation; ASGI – Associazione per gli Studi Giuridici sull'Immigrazione et al., Voluntary Humanitarian Refusal: una proposta che non si può rifiutare. Stop alle espulsioni mascherate dai Paesi di transito. Press kit, 2025, <https://www.asgi.it/wp-content/uploads/2025/03/press-kit-VHRefusal.pdf>; Bertrand Steiner, Adèle Appriou, Ravenna Sohst and Camille Le Coz, Reframing Return and Reintegration: Origin-country Priorities and Strategies for Cooperation, Policy Brief, Migration Policy Institute Europe, Ottobre 2025, <https://www.migrationpolicy.org/mpi-europe/publication/reframing-return-and-reintegration-origin-country-priorities-and-strategies>; Alice Fill and Francesco Moresco, Voluntary returns from Libya in the EU externalisation strategy: a critical analysis in the light of ASGI's strategic litigation, ASGI, 2 February 2021, <https://www.asgi.it/en/sciabaca-oruka/voluntary-returns-from-libya-in-the-eu-externalisation-strategy-a-critical-analysis-in-the-light-of-asgis-strategic-litigation/>

¹³⁵ Katie Kuschminder, Sze Eng Tan, Lea Jechel, Johannes Schmitt and Martin Bruder, The Effects of Assisted Return Programmes on Sustainable Reintegration: A Review, *International Migration*, 2026, <https://onlinelibrary.wiley.com/doi/10.1111/imig.70122>; Zeynep Sahin-Mencutek and Anna Triandafyllidou, Coerced Return: Formal Policies, Informal Practices and Migrants' Navigation, *Journal of Ethnic and Migration Studies*, vol. 51, n. 2, 2024, <https://www.tandfonline.com/doi/full/10.1080/1369183X.2024.2371209>.

¹³⁶ OHCHR and UNSMIL, Business as Usual: Human Rights Violations and Abuses against Migrants, Asylum-Seekers, and Refugees in Libya, 2026, <https://www.ohchr.org/en/documents/reports/business-usual-human-rights-violations-and-abuses-against-migrants-asylum-seekers>; Amnesty International, Tunisia: "Nobody hears you when you scream": Dangerous shift in Tunisia's migration policy (2025), Index No. MDE 30/0180/2025, 6 November 2025, <https://www.amnesty.org/en/documents/mde30/0180/2025/en/>

¹³⁷ Barak Kalir, Between 'Voluntary' Return Programs and Soft Deportation: Sending Vulnerable Migrants in Spain Back 'Home', in Zana Vathi and Russell King (eds.), *Return Migration and Psychosocial Wellbeing*, Routledge, London-New York, 2017, pp. 56-71, https://www.researchgate.net/publication/317234883_Between_'Voluntary'_return_programs_and_soft_deportation_Sending_vulnerable_migrants_in_Spain_back_'Home'

¹³⁸ United Nations Human Rights Council, Report of the Special Rapporteur on the Human Rights of Migrants, A/HRC/38/41, 38th session, 18 June-6 July 2018, United Nations, 2018, <https://www.right-docs.org/doc/a-hrc-38-41/>

¹³⁹ The principle of non-refoulement prohibits States from transferring or returning a person to a country where there are substantial grounds for believing that they would face a risk of persecution, torture, or inhuman or degrading treatment. The principle is enshrined in Article 33 of the 1951 Geneva Convention.

¹⁴⁰ Office of the United Nations High Commissioner for Human Rights (OHCHR), Nowhere but Back: Assisted Return, Reintegration and the Human Rights Protection of Migrants in Libya, United Nations, Geneva, 2023, <https://www.ohchr.org/en/documents/reports/nowhere-back-assisted-return-reintegration-and-human-rights-protection-migrants>

ability to produce lasting development outcomes. Available evidence shows that reintegration sustainability largely depends on the economic, social, and institutional context of the country of origin, the degree of preparation for return, access to services, and the opportunities available upon return. Economic assistance from programmes alone is unlikely to guarantee stable reintegration pathways over time.¹⁴¹ Similar findings emerge from the impact evaluation of the *EU-IOM Joint Initiative* for the Horn of Africa. Outcomes vary considerably across national contexts, underscoring how difficult it is to consolidate sustainable reintegration pathways in countries affected by conflict, instability, and socioeconomic fragility. At the same time, the evaluation acknowledges the value of the assistance provided for humanitarian support and the protection of rights, while highlighting structural limitations that may reduce its effectiveness in the medium and long term.¹⁴²

It is precisely at the intersection of these three dimensions – the growing centrality of return in European migration governance, the increasingly extensive use of development cooperation resources, and the tensions between stated development objectives and functions aimed at containing mobility – that this chapter is situated, to critically analyse the extent to which these programmes are consistent with OECD-DAC criteria and with the development objectives that justify their classification as ODA.

OECD-DAC guidelines allow these interventions to be classified as ODA when their primary objective remains promoting development and sustainable reintegration in partner countries. Measures primarily aimed at controlling mobility or

pursuing donor countries' migration interests are excluded.¹⁴³ **However, in practice this boundary can become less clear-cut. Programmes initially designed to support voluntary return, migrant protection, and reintegration may, over time, become embedded within broader strategies for managing migration and externalising migration control. Therefore, the key question is not only whether these programmes formally comply with OECD-DAC criteria, but also what function they perform: whether they remain primarily oriented towards development and protection objectives, or whether they also contribute to deterrence, increasing returns, and the containment of mobility.**

¹⁴¹ Jennifer Vallentine, Roberto Forin and Bram Frouws, *Mixed Returns: Return Migration and Reintegration Dynamics*, Briefing Paper, Mixed Migration Centre (MMC), Ottobre 2024, <https://mixedmigration.org/resources/mixed-returns-return-migration-and-reintegration-dynamics/>; Katie Kuschminder, Sze Eng Tan, Lea Jechel, Johannes Schmitt and Martin Bruder, *The Effects of Assisted Return Programmes on Sustainable Reintegration: A Review*, *International Migration*, 2026, <https://onlinelibrary.wiley.com/doi/10.1111/imig.70122>

¹⁴² International Organisation for Migration (IOM). (2023). *Returning Home: Evaluating the Impact of IOM's Reintegration Assistance for Migrants in the Horn of Africa*. Geneva: International Organisation for Migration. https://publications.iom.int/system/files/pdf/pub2023-147-r-returning-home-evaluating-the-impact_1.pdf

¹⁴³ Organisation for Economic Co-operation and Development (OECD), Development Assistance Committee (DAC). *ODA Casebook on Activities in the Field of Migration*. DCD/DAC/STAT(2023)34/FINAL. Paris: OECD, 2025, [https://one.oecd.org/document/DCD/DAC/STAT\(2023\)34/FINAL/en/pdf](https://one.oecd.org/document/DCD/DAC/STAT(2023)34/FINAL/en/pdf); See also: Organisation for Economic Co-operation and Development (OECD), Development Assistance Committee (DAC). *Update to the Review of the Activities Reported under Purpose Code 15190 on the Facilitation of Orderly, Safe, Regular and Responsible Migration and Mobility*. DCD/DAC/STAT(2025)9/FINAL. Paris: OECD, 2025, [https://one.oecd.org/document/DCD/DAC/STAT\(2025\)9/FINAL/en/pdf](https://one.oecd.org/document/DCD/DAC/STAT(2025)9/FINAL/en/pdf)

European return and reintegration programmes

The Action Document *Migrant Protection, Return and Reintegration Programme for Sub-Saharan Africa (MPRR) Phase 2*,¹⁴⁴ initially adopted in 2022 and topped up in 2024, is implemented by IOM in Guinea, Mali, Nigeria, The Gambia, Niger, Senegal, Sierra Leone, Côte d'Ivoire, Burkina

Faso, Cameroon, Chad, Ghana, Sudan, Ethiopia, Somalia, Guinea-Bissau, Mauritania, Liberia and Benin and is tagged as 100% *dacable* under the code 15190 - Facilitation of orderly, safe, regular and responsible migration and mobility.

The Specific Objectives and indicative activities are the following:

TABLE 12. Migrant Protection, Return and Reintegration Programme for Sub-Saharan Africa (MPRR) Phase 2

Specific objectives	Indicative activities
» Provide gender-responsive, rights-based, and disability inclusive protection and other essential support for migrants stranded in relevant Sub-Saharan transit countries in the Atlantic/Western and Central Mediterranean routes. » Support individual reintegration in countries of origin in Sub-Saharan Africa, with a focus on the countries relevant for Atlantic/Western and Central Mediterranean routes, including for returnees from North Africa within available resources. In the medium term, it is envisaged that individual reintegration will only be provided in countries of origin where national referral systems are not operational to provide for sustainable reintegration	» Search and Rescue and Humanitarian Rescue operations (based on a qualitative and quantitative assessment of migratory flows) » Provision of protection and assistance to migrants stranded along key migration routes or at disembarkation points » Pre-departure counselling to ensure informed returnees. » Provision of pre-departure hospitality, medical and psychological assistance and support for travel documentation; » Support for assisted voluntary return » Post-arrival reception assistance, including through transit centres in countries of origin in the Atlantic/Western Mediterranean route. » Sustainable individual reintegration assistance (economic, social and psychosocial services)

Source: European Commission, *Migrant Protection, Return and Reintegration Programme for Sub-Saharan Africa (MPRR) Phase 2*. Publications Office of the European Commission, 2024

One can notice a focus on returns to countries that are relevant to the Atlantic and Central Mediterranean routes. Notably, **the activities foreseen begin with the provision of Search and Rescue and Humanitarian operations and follow the person all the way to their reintegration in the country of origin, therefore creating a 'chain of return' that – under the premise of protecting stranded migrants – also serves the purpose of preventing arrivals to Europe.** The project builds on previous and

complementary actions: in 2017 the EU-AU-UN put in place a joint Task Force focused on facilitating voluntary humanitarian returns to countries of origin, and the resettlement of those in need of international protection; the UNHCR implemented the Emergency Transit Mechanism (ETM) in Niger and Rwanda to evacuate refugees and asylum seekers in Libya; and the abovementioned EU-IOM Joint Initiative for Migrant Protection and Reintegration.¹⁴⁵ As the problem analysis notes, *“Following the technical dialogue set out with*

¹⁴⁴ European Commission, *Migrant Protection, Return and Reintegration Programme for Sub-Saharan Africa (MPRR) Phase 2*. DG INTPA, 2024. https://international-partnerships.ec.europa.eu/countries/sub-saharan-africa_en

¹⁴⁵ Ibidem.

*Libya and the results achieved in that framework that led to the cancellation of the exit visa fee and the significant reduction of the exit procedures for the voluntary humanitarian returns, encouraging discussions were held with IOM with a view to the significant scale-up of the voluntary humanitarian returns, potentially to 25.000 per year”.*¹⁴⁶ The Action, initially adopted in 2022 with a budget of €330 million, is the individual action with the highest budget in Sub-Saharan Africa; the budget was later topped up in 2024 with a further €80 million for 2024 and 2025.¹⁴⁷

As the context analysis notes, *“The action will generate positive impacts by contributing to better migration management, preventing irregular migration, mitigating the consequences of migrant smuggling and trafficking in human beings, addressing factors that induce irregular migration, while enhancing cooperation and dialogue”.*¹⁴⁸ The context analysis also examines the numbers of arrivals across the main migratory routes to Europe, noting that arrivals through the Central Mediterranean route saw a large decrease in the first six months of 2024, but *“a 174% increase was recorded on the Atlantic route, where almost 20,000 people arrived between January and June 2024”.*¹⁴⁹

When it comes to the ODA compliance of this Action, Criterion 5 of the OECD guidelines clarifies that forced returns are excluded from ODA, while other returns can be counted as ODA if they are from one developing country to another and are safe, dignified, informed, and voluntary. Criterion 3 specifies that projects with mutual benefits can be eligible for ODA if their expected results, objectives, indicators, and overall project narrative do not respond to the interests of donor countries, in particular by curbing migratory flows, and do not provide a short-term response but rather an intervention aimed at long-term sustainable

development. **In this sense, while the Action might at first instance appear to be in line with Criterion 5, the underpinning logic – especially under Specific objective 1 – and indicative activities show a pattern of deterrence, by creating an infrastructure where ‘voluntary return’ is the only option available in countries along key migratory routes to the EU.** As for the indicators, they measure the functioning of this chain of return, aiming to assist 20,000 migrants to return voluntarily to their countries of origin; provide 35,000 returning migrants with post-arrival assistance; provide 35,000 beneficiaries with reintegration assistance; as well as measuring the number of returning migrants in countries of origin in Sub-Saharan Africa; and the number of transit centres or migrant resource and response centres that are supported.

For reintegration assistance, Criterion 6 specifies that reintegration activities are, in principle, ODA-eligible, but they must focus on the economic development and welfare of countries of origin and should not, as a general rule, focus solely on returnees from a donor country. In this sense, projects reviewed under this category comply with the OECD principles and guidance, as the activities include the sustainable integration of returnees, the prevention of stigmatisation, psychosocial support, support for social cohesion, and support for national and local authorities in implementing effective reintegration assistance systems and infrastructure. Having said that, reintegration cannot be seen as a standalone activity, but as the last stop of a chain of return that runs through the various parts of the migratory routes to Europe and that can *“contribute to limiting the risk of irregular re-migration”.*¹⁵⁰ Therefore, while the individual activities might be ODA-compliant, the motives underpinning the intervention are not free from a deterrence logic.

¹⁴⁶ Ibidem.

¹⁴⁷ NDICI-Global Europe Actions on Migration and Forced Displacement List of actions committed (Adopted decisions), in *DG INTPA*. European Commission, 2025. https://international-partnerships.ec.europa.eu/document/download/7002229d-6be3-4efb-99b7-9fcb0ae665dd_en?filename=NDICI-Global%20Europe%20actions%20on%20migration%20and%20forced%20displacement.pdf

¹⁴⁸ European Commission, Migrant Protection, Return and Reintegration Programme for Sub-Saharan Africa (MPRR) Phase 2. DG INTPA, 2024. https://international-partnerships.ec.europa.eu/countries/sub-saharan-africa_en

¹⁴⁹ Ibidem.

¹⁵⁰ Council of the European Union, *Assisted Voluntary Return and Reintegration (AVRR) programmes in the African context*, 2025. <https://www.statewatch.org/media/5055/10308-2025-avrr-programmes-in-african-context.pdf>

With the growing political pressure in Europe to boost returns, the budget for return and reintegration programmes is only expected to grow. As the document from the Action *Managing Migration Better in Western Africa* reads, “Returns from Europe, North Africa and transit countries in Sub-Saharan Africa will thus likely remain high in the coming years, triggering continued needs for reintegration in the context of all types of returns”.¹⁵¹ This logic is explicitly presented in a paper from the Danish presidency of the Council focusing on returns and readmissions, which reviews the number of people returned through AVRR programs, and notes that “the above-mentioned tendencies speak to the effectiveness of the EU’s initial investment in a route-based approach to migration management, which prioritize return and reintegration support in key transit and host countries, thus potentially reducing the number of returns from Europe by addressing return and reintegration needs earlier along the migration route, notably in Africa”.¹⁵²

In light of this growing political pressure, it is also crucial to critically reflect on the implications of the recently adopted Return Regulation for the next EU budget. The Return Regulation largely broadens the scope and definition of the country of return, extending it so broadly that it establishes a framework for systemic deportations and opens the possibility for Member States and the EU to set up ‘return hubs’ in third countries.¹⁵³ These new provisions will make it possible to send people to countries they have never been to before and have no connections with – thereby calling for a reconsideration of the terminology of ‘return’ to speak of deportations more appropriately. In this context, **it is crucial to monitor the direction of programming of EU external action on return and readmissions and how it will take into account these new legislative proposals – often grouped under the label**

of ‘innovative solutions’ – which distance themselves radically from the boundaries of what ODA can fund and what it cannot.

At the same time, another key element of these discussions is the growing political importance given to third countries’ cooperation on returns and readmissions: the proposal for the next Global Europe Instrument includes, for the first time, the possibility to suspend funding or the implementation of programmes to countries that are assessed as being uncooperative, as examined in Chapter 4.3.

In this sense, two growing pressures coexist: one is to boost return and reintegration programmes before people reach Europe, through AVRR programmes and the so-called route-based approach; the other is to exponentially increase the return rate from Europe by expanding deportation operations. In both cases, deterrence is central, and the objectives of preventing arrivals and containing returnees largely overshadow implications for local sustainable development.

Italian return and reintegration programmes

At the Italian level, return and reintegration programmes provide a particularly useful lens for examining the use of ODA in externalisation policies. They show how interventions formally oriented towards assistance, protection, and reintegration can be embedded within broader strategies aimed at containing mobility and reducing arrivals to Europe. A particular case is Libya: between 2017 and 2024, the Ministry of Foreign Affairs and International Cooperation (MAECI) financed six return and reintegration interventions entrusted to the IOM, totalling approximately €45.5 million, initially through the Africa Fund and later through the Migration Fund.

¹⁵¹ European Commission, *Managing migration better in Western Africa*. DG INTPA, 2024. https://international-partnerships.ec.europa.eu/countries/sub-saharan-africa_en

¹⁵² Council of the European Union. (2025). *Assisted Voluntary Return and Reintegration (AVRR) programmes in the African context*. <https://www.statewatch.org/media/5055/10308-2025-avrr-programmes-in-african-context.pdf>

¹⁵³ European Parliament, New EU system for return of illegally staying third-country nationals | News | European Parliament. (2026). <https://www.europarl.europa.eu/news/en/press-room/20260611IPR45214/new-eu-system-for-return-of-illegally-staying-third-country-nationals>; ActionAid, Final green light by the European Parliament on the Return Regulation: detention and deportations become the new norm. 2026, June 18, *ActionAid International*. <https://actionaid.org/news/2026/final-green-light-european-parliament-return-regulation-detention-and-deportations-become>

Over these years, the Italian interventions entrusted to the IOM in Libya progressively changed in structure and priorities. The approach shifted from a broad programme, conceived as an emergency response and aimed at the overall management of the migration crisis – encompassing humanitarian assistance, protection, community stabilisation, return, and the strengthening of authorities – towards more selective programming organised around more clearly defined areas of intervention.

Throughout this process, voluntary return and reintegration remained a constant, while the relative importance of other areas shifted. Direct assistance in detention centres and urban areas, as well as community stabilisation interventions, became less central. At the same time, labour migration governance, labour-force management systems, the strengthening of border authorities, Search and Rescue activities – particularly in the desert – and the production of data on migratory movements gained greater emphasis. Overall, this represents a shift from a more comprehensive architecture, in which different components contributed to a unified response to the crisis, towards more targeted interventions. Within this new configuration, VHR represents the element of greatest continuity, while the other activities are progressively redefined in line with the priorities of migration cooperation.

The continuity of funding and the expansion of activities demonstrate that return and reintegration are not exclusively development and humanitarian measures but rather stable components of a broader migration cooperation strategy that also encompasses migration management, pushbacks, and containment measures. **The progressive integration of return and reintegration programmes into externalisation strategies reflects the growing subordination of development cooperation to migration policy objectives.** Although formally framed

as development and humanitarian protection interventions, these programmes are increasingly incorporated into broader mechanisms for managing and containing mobility. Therefore, the same development cooperation instrument may ultimately support strategies of deterrence, containment, and externalisation, creating tension both in the formal accountability of resources as ODA and in the transformation of the intervention's objectives, subordinating development objectives to the priorities of migration governance.

Italian funding to the IOM for return programmes from Libya has been subject to continuous monitoring, FOI requests, and litigation promoted by Italian civil society organisations. A first round of legal challenges¹⁵⁴ concerned the *Comprehensive and Multi-sectoral Action Plan in Response to the Migration Crisis in Libya*, funded by MAECI in 2017 with €18 million, of which €10 million was allocated to humanitarian return and reintegration. The challenges highlighted the absence of a documented assessment of the voluntariness of return, the risks of *refoulement*, and the procedures for identifying and protecting asylum seekers, minors, and victims of trafficking, with particular attention to Nigerian women exposed to the risk of persecution, stigmatisation, and re-trafficking following their return.

The same concerns resurfaced in November 2024, when a wider group of organisations¹⁵⁵ challenged the funding of the project *Multi-Sectoral Support for Vulnerable Migrants in Libya* (Table 13). The project, funded with €7 million for the period July 2024–June 2026, allocated €970,000 to carrying out 820 voluntary humanitarian returns of people rescued at sea, detained in centres, or present in urban and rural areas of Libya. The applicants did not seek revocation of the entire funding allocation, but rather the suspension of the VHR component and reallocation of resources to the other assistance activities envisaged.¹⁵⁶

¹⁵⁴ Initiated by the organisations ASGI, Spazi Circolari and Differenza Donna in January 2021.

¹⁵⁵ ASGI, ActionAid, A Buon Diritto, Differenza Donna, Casa delle Donne Lucha y Siesta, Spazi Circolari, and Le Carbet.

¹⁵⁶ The Lazio Regional Administrative Court did not examine these issues on their merits. In February 2025, the application was declared inadmissible because IOM had not been notified, as it had been classified as an interested third party, being the beneficiary of the funding

TABLE 13. IOM Multi-Sectoral Support for Vulnerable Migrants in Libya (2024)¹⁵⁷

Specific objectives	Indicative activities
» Humanitarian Voluntary Return and Reintegration: Support the return of vulnerable migrants and their reintegration in their countries of origin.	» Information and assistance for return. » Travel arrangements. » Individual reintegration plans. » Medical, psychosocial, housing, training and employment support.
» Search and Rescue in the Desert: Strengthen the capacity of Libyan authorities to provide assistance along the border with Tunisia.	» Construction and rehabilitation of infrastructure. » Provision of vehicles and equipment.
» Labour Migration and Socioeconomic Inclusion: Improve the management of the migrant workforce and access to employment for young Libyans and migrants.	» Training in first aid, human rights and international protection. » Training for public authorities and the private sector. » Strengthening of labour market information systems. » Vocational training and soft skills development.
» Migration Data and Monitoring: Produce information to inform policies and interventions.	» Support for social cohesion and TVET centres. » Monitoring of migration flows and routes. » Collection and analysis of migration data. » Production and dissemination of reports and studies.

Source: elaboration of project documents obtained through FOI requests, reworked from the ActionAid Italy Observatory *The Big Wall*.

The two legal challenges highlighted several recurring concerns regarding this type of funding. The first concerns the voluntariness of return. In a context such as Libya, which lacks an effective asylum system and is characterised by the criminalisation of irregular presence, arbitrary detention, violence, and a scarcity of safe alternatives, participation in a VHR programme may represent more of an obligatory way out than a free choice.

A second issue concerns the principle of *non-refoulement* and, more broadly, the sustainability of return. According to the applicant organisations, individual assessments concerning protection needs, risks in countries of origin, and the possibility that returnees may once again be exposed to persecution, trafficking, or violence were not adequately documented.

The third issue concerns the funder's due diligence. The applicants argue that MAECI re-funded these

programmes without demonstrating that it had sufficiently and thoroughly assessed international recommendations, the concrete conditions of implementation, and the outcomes of previous projects. These concerns are compounded by transparency and monitoring issues: the available reports provide inconsistent information on nationality, gender, age, vulnerability conditions, places of origin, and reintegration pathways.

Some data make these concerns particularly evident. Between March and August 2023, 237 of the 239 people who returned had reportedly been detained previously. The 2024 project proposal also indicated that 43% of VHR beneficiaries in 2023 were in detention at the time of identification. These elements do not necessarily mean that consent was absent in every case. They do, however, make it all the more important to have rigorous and independent assessments of the genuine voluntariness of return, which,

and a party to the technical agreement with MAECI. The ruling is therefore procedural in nature and does not express a view either on the substantive legality of VHR in Libya or on the adequacy of the safeguards and ministerial assessment process.

¹⁵⁷ The Big Wall, ActionAid Italy, [Multi-Sectoral Support for Vulnerable Migrants in Libya, 2024](#)

according to the applicants, were not adequately documented.¹⁵⁸

The 2024–2025 litigation forms part of the broader *Voluntary Humanitarian Refusal* campaign, promoted by the same organisations together with other actors working in the fields of asylum, cooperation, freedom of movement, anti-trafficking, and combating gender-based violence. The legal action therefore represents only one component of the campaign. FOI requests, communications to UN mechanisms, research activities in countries of origin, and advocacy initiatives accompanied the legal challenges. The demands included suspending returns from transit countries where no effective alternatives exist, greater transparency on the programmes, independent oversight, and verifiable safeguards to ensure consent to return is genuinely free and informed.¹⁵⁹

Within the framework of development cooperation, these challenges raise issues that go beyond the legality of individual operations and question the role that resources formally intended for assistance, protection, and reintegration assume when deployed in a context of interception, mobility containment, detention, and return. The voluntariness of return is only one part of the issue. Equally important is the public funder's ability to exercise effective due diligence: to know who is being returned, the living conditions before return, what alternatives are available, the risks in the country of origin, and what happens after the return. Without accessible information, independent oversight, and adequately documented individual assessments, it becomes difficult to determine whether the development and protection objectives stated by the projects remain genuinely prioritised over deterrence and mobility management objectives.

4.2 - Protection programs and interventions on root causes: the migration-development nexus

4.2.1 - Protection and forced displacement programmes

Protection programmes account for a substantial share of both European and Italian funding. Many of the interventions examined in this section respond directly to the needs of refugees, internally displaced persons, migrants in vulnerable situations, and host communities through access to basic services, protection assistance, livelihood support, and durable solutions. These activities are generally consistent with the purposes and eligibility requirements of ODA. However, the question arises from the broader policy environment in which they are implemented. Across the cases examined below, protection may operate alongside border control, interception and return policies, respond to humanitarian needs generated or aggravated by those policies, or be framed in part as a means of reducing onward movement. These different configurations do not make protection expenditure inconsistent with ODA principles. However, they highlight the relationship between an activity's immediate purpose and the wider migration-policy framework in which it operates. This section examines protection funding at both the EU and Italian levels, with a particular focus on this relationship and the questions it raises for policy coherence for development.

European protection and forced displacement programmes

Protection and forced displacement programmes constitute an important part of EU funding, being the main category of budget allocated to the Sub-Saharan Africa region, and the second in North

¹⁵⁸ The data and information reported in this section are drawn from documentation relating to the litigation, including submissions by the applicant organisations and the attached project documentation. These documents are not publicly available.

¹⁵⁹ Voluntary Humanitarian Refusal: una scelta che non puoi rifiutare. Manifesto della campagna per fermare i programmi di rimpatrio "volontario" dai Paesi di transito; Press Kit – Voluntary Humanitarian Refusal, 2025. <https://www.asgi.it/sciabaca-oruka/campagna-voluntary-humanitarian-refusal/>

Africa. While the European Commission tags them as two separate categories, this analysis treats them together, as the supported activities are very similar. The distinction mostly stems from differing reporting habits among DGs: protection is mainly used in the neighbourhood region, while forced displacement is more commonly used in the regions under DG INTPA's competence.¹⁶⁰ Forced displacement follows a programming logic that emphasises the structural and protracted development challenges of displacement and can encompass a wider set of activities, including protection and durable solutions. Protection is slightly narrower, but ultimately the activities funded under these two categories are largely similar.¹⁶¹

As shown below, activities covered in this area of intervention include **gender-sensitive and child-focused protection response, access to shelter, water and sanitation, health care, education and social services, support to forcibly displaced populations and host communities for durable solutions and social cohesion, access to social protection and labour market, supporting policy and institutional development for adequate response to the needs of forcibly displaced populations**. This support is crucial: UNHCR data for 2025 show that of the 117,3 million forcibly displaced people worldwide, 22,5 million are in Eastern and Southern Africa, 16,1 million in West and Central Africa, and 22,6 million in the Middle East and North Africa.¹⁶² Of these, the vast majority are IDPs: 16,2 million in Eastern and Southern Africa, 12,6 million in West and Central

Africa and 14,6 million in the Middle East and North Africa.¹⁶³ Colombia, Germany, Türkiye, Iran and Uganda alone host over one-third of the world's refugees and other people in need of international protection.¹⁶⁴ Because of that, interventions that aim to foster protection, social cohesion, local integration and durable solutions will remain essential in the short, medium and long term.

NDICI-GE actions reviewed under these categories aim to respond to such displacement situations and the related needs that emerge in both host communities and among displaced people. For instance, the *Action Protection, Assistance and Durable Solutions for Populations Displaced by Conflict in Sub-Saharan Africa*, adopted in 2024 with a budget of €90 million, acknowledges in the context analysis that “*Countries in Sub-Saharan Africa hosted 7 million refugees (or 1 in 5 of all refugees globally) in 2022*”.¹⁶⁵ It focuses on four protracted displacement situations and aims to respond to significant gaps “*in the inclusion of forcibly displaced populations as they are often excluded from government and donor development programs [due to] the prevailing perception of forcibly displaced populations primarily as beneficiaries of humanitarian assistance rather than as active contributors to broader development objectives*”.¹⁶⁶ The Action therefore aims to empower IDPs and refugees to contribute meaningfully to local economic growth, education, healthcare, social cohesion, and community development. The specific objectives and indicative activities are summarised in the table below:

¹⁶⁰ Interview with representatives of European Commission, DG MENA and DG INTPA.

¹⁶¹ Ibidem.

¹⁶² Refugee Data Finder. (2025). UNHCR. Retrieved January 14, 2026, from <https://www.unhcr.org/refugee-statistics>

¹⁶³ Ibidem.

¹⁶⁴ Ibidem.

¹⁶⁵ European Commission, *Protection, Assistance and Durable Solutions for Populations Displaced by Conflict in Sub-Saharan Africa*. DG INTPA, 2024. https://international-partnerships.ec.europa.eu/countries/sub-saharan-africa_en

¹⁶⁶ Organisation for Economic Co-operation and Development (OECD), Development Assistance Committee (DAC). *ODA Casebook on Activities in the Field of Migration*. DCD/DAC/STAT(2023)34/FINAL. Paris: OECD, 2025, [https://one.oecd.org/document/DCD/DAC/STAT\(2023\)34/FINAL/en/pdf](https://one.oecd.org/document/DCD/DAC/STAT(2023)34/FINAL/en/pdf)

TABLE 14. Protection, Assistance and Durable Solutions for Populations Displaced by Conflict in Sub-Saharan Africa

Specific objectives	Indicative activities
» To strengthen multidimensional (climate, post-conflict) resilience and self-reliance of the forcibly displaced populations and host communities, in particular women, persons with disabilities and children » To provide inclusive and durable (socially, environmentally) solutions for forcibly displaced populations, in particular women, persons with disabilities and children	» Gender and human rights needs assessments » Facilitating access to healthcare, water, sanitation and hygiene services; appropriate accommodation/ shelters and essential services (health, justice, education, social services) » Facilitating access to documentation; social safety nets; income-generating activities and/or training support (vocational training, skills development, etc) » Increasing forcibly displaced populations' and host communities' livelihood opportunities; cash for work in areas hosting forcibly displaced populations » Promoting legal and policy reform for refugees/IDPs' inclusion and participation in local development and contingency plans » Promoting peacebuilding, social cohesion and conflict prevention » Ensuring the exercise of a free and informed choice in the context of voluntary return options; supporting return transportation options » Supporting the addressing of the issue of housing, land and property rights » Livelihoods interventions in return areas through provision of agricultural inputs, income-generating opportunities, microcredit schemes, etc. » Facilitating the participation of returnees in local reconciliation activities

Source: European Commission, *Protection, Assistance and Durable Solutions for Populations Displaced by Conflict in Sub-Saharan Africa*. Publications Office of the European Commission, 2024

The Action is tagged 100% *dacable* under the code 15190 – Facilitation of orderly, safe, regular and responsible migration and mobility. From the information available, and looking at similar programmes analysed by the OECD in its *Casebook on activities in the field of migration*,¹⁶⁷ the Action appears aligned with Principles 1, 3 and 5 of the guidelines, as it responds to local community needs and fosters the integration of forcibly displaced populations and their contributions to local economic and community development.

In North Africa, a similar Action was adopted in 2024, titled *Supporting Protection and Strengthening the Resilience of Migrants*,

Refugees and Other People in Need of Protection in North Africa, with a budget of €53 million, to be implemented in Egypt, Libya, Morocco and Tunisia. The Action is tagged as 100% *dacable* under the code 15190 – Facilitation of orderly, safe, regular and responsible migration and mobility. While this Action has similar activities to the former, like the delivery of life-saving assistance, capacity-building of protection actors and structures, the support for regularisation, family reunification and resettlement, improving access to healthcare, education and other essential services and fostering long-term resilience and livelihood opportunities, it also includes activities – specifically in Libya – like “life-saving interventions at disembarkation

¹⁶⁷ Ibidem.

points and detention centres".¹⁶⁸ **While these interventions are fully aligned with OECD DAC rules on development assistance, they also raise a broader policy question: to what extent do they mitigate the humanitarian consequences of border externalisation policies that simultaneously make migration routes more precarious and dangerous?**

The so-called 'disembarkation points' are where people intercepted and pulled back by the Coast Guard are brought. It is of course important that people can access lifesaving responses once disembarked after interception operations, not least since episodes of violence during these operations are common and well-documented. However, the need for such interventions is a testament to the incoherence of the EU external migration policy which, on the one hand, has financially supported over the years the construction, equipment and legitimisation of the Libyan Coast Guard and its interception operations, and on the other hand, finances humanitarian operations following those same interceptions. This incoherence also emerges in the budget allocation itself: as shown in the previous chapter, 51% of the budget allocated to North Africa went to migration and border management, and only 22% went to protection. When deterrence is the overarching paradigm, protection elements may need to mitigate its impact, creating competing interests and inconsistencies in the EU's strategy in a given country or region. A similar finding was reached by a study requested by the DEVE Committee in the European Parliament on PCD in the EU external action, where the domain of humanitarian aid and crisis response was found to be overall aligned with normative principles of EU development cooperation and partner countries' needs, but *"coherence risks arise when humanitarian action is pulled into broader stabilisation, resilience, or migration-management narratives"*.¹⁶⁹

Italian protection programmes

Protection also accounts for a substantial share of Italian migration-related expenditure, representing 56% of resources allocated through the Migration Fund and 20% through the Incentive Fund. Projects in this category include many of the same activities examined at the European level, from direct assistance and access to essential services to support for people in vulnerable situations.

The Italian cases also reproduce some of the tensions identified above. While these interventions respond to genuine protection needs, in some contexts they operate within the same system of externalised migration control that produces or exacerbates the vulnerabilities they seek to address. This is particularly evident in Libya, where protection programmes coexist with Italian and European support for interception, border control and return. One example is the project *Provision of basic needs and essential services to forcibly displaced people*, financed by the Migration Fund and entrusted to UNHCR in 2024 (Table 15). The project provides protection services, registration, assistance in obtaining documents for refugees and asylum seekers, support and healthcare services for those in detention centres and at disembarkation points, and, finally, the evacuation of around a thousand people to third countries. As seen in the European example, while these are activities which address the needs of people in situations of extreme danger and emergency and are aligned with ODA rules, they take place in an overall context of deterrence which is clearly described in the project document: *"the strengthening of maritime surveillance by the Libyan coastguard contributed to the interception of 21,762 people, and UNHCR intervenes at disembarkation points precisely following rescue or interception operations at sea"*.¹⁷⁰

¹⁶⁸ European Commission, *Supporting Protection and Strengthening the Resilience of Migrants, Refugees and Other People in Need of Protection in North Africa*. Publications Office of the European Commission, 2024. [40a6f73c-8938-443f-a9c8-ed284c7f20a7_en](https://doi.org/10.1017/9781017000000)

¹⁶⁹ Lukas Schlögl, Stefan Mayr, Simela Papatheophilou and Werner Raza, *The Foundations of EU Development and Cooperation Policies*, European Parliament, March 2026. [https://www.europarl.europa.eu/RegData/etudes/STUD/2026/783609/EXAS_STU\(2026\)783609_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2026/783609/EXAS_STU(2026)783609_EN.pdf)

¹⁷⁰ The Big Wall, ActionAid Italy, *Provision of Basic Needs and Essential Services to Forcibly Displaced People*, 2025

TABLE 15 – UNHCR Libya - Provision of Basic Needs and Essential Services to Forcibly Displaced People¹⁷¹

Specific objectives	Indicative activities
» Protection: refugees and asylum-seekers have access to a range of protection services, including registration, child protection (best-interest procedures), GBV case management, and processing for durable solutions.	» Registration and issuance of documentation at the UNHCR Sarraj Registration Centre in Tripoli (new/continuous registration, bio-data updates, interviews for durable solutions, refugee status determination). » Tailored protection services to vulnerable refugees and asylum-seekers: protection desks for GBV survivors and unaccompanied minors, MHPSS, legal assistance (counselling, mediation, representation), needs assessments and community outreach through the Community Day Centre. » Child protection services, including child-friendly spaces: structured play/recreational sessions, best-interest assessments and support to families providing temporary care.
» Assistance: increased access for refugees and asylum-seekers to basic services through the provision of cash, core relief items and health services.	» Life-saving healthcare in detention centres, disembarkation points and urban settings: primary healthcare, medical screenings/consultations and referrals to secondary care; 24/7 medical staff at disembarkation points. » Distribution of hygiene kits and core relief items (blankets, mattresses, tarpaulin, solar lamps, kitchen sets, jerry cans), plus advocacy for release from detention.
» Durable solutions: evacuation of refugees and asylum-seekers at heightened risk, having been identified and assessed for durable solutions.	» Cash assistance to refugees and asylum-seekers in the urban setting, including a hybrid cash/voucher/in-kind modality for the most vulnerable (homeless, survivors of violations, medical emergencies, released detainees). » Life-saving evacuation and durable solutions: identification and departure of at-risk refugees via the Emergency Transit Mechanism to Rwanda and the humanitarian corridor to Italy, targeting ~500 departures each to Italy and Rwanda in 2025.

Source: analysis of project documents obtained through FOI requests, based on data from ActionAid Italy's *The Big Wall Observatory*.

Another key example is the project *Supporting a Human Rights-Based Response to Cross-Border Movements to Libya (Focus on the Tunisia/Libya border situation)*, financed with the Migration Fund. As European efforts to curb migration flows have intersected with Tunisia's broader authoritarian turn under President Kais Saied, vehicles, equipment, and other forms of support provided by the EU and Member States have become part of a migration-control system that led to collective expulsions of migrants towards the Libyan and Algerian borders.¹⁷² The project *Supporting a Human Rights-Based Response to Cross-Border Movements to Libya (Focus on the Tunisia/Libya*

border situation), entrusted to the IOM in 2023 and funded by Italy with €1 million, aims to "provide assistance to migrants and persons in need of international protection affected by the situation at the Libya/Tunisia border".¹⁷³ Unlike previous interventions, it is classified primarily as a migration and border management project, and only secondarily as a protection measure. The plan foresees strengthening Libyan border authorities and providing direct assistance with basic needs, healthcare, and psychosocial support for the migrants involved. The project document itself places the intervention in the context of the deportations of migrants from

¹⁷¹ Ibidem.

¹⁷² Lighthouse Reports et al., *Desert Dumps*, 20 May 2024, <https://www.lighthousereports.com/investigation/desert-dumps/>; Human Rights Watch, *Tunisia: No Safe Haven for Black African Migrants, Refugees*, 19 July 2023, <https://www.hrw.org/news/2023/07/19/tunisia-no-safe-haven-black-african-migrants-refugees>; Human Rights Watch, *Tunisia: African Migrants Intercepted at Sea, Expelled*, 10 October 2023, <https://www.hrw.org/news/2023/10/10/tunisia-african-migrants-intercepted-sea-expelled>

¹⁷³ *The Big Wall*, ActionAid Italy, *Supporting a Human Rights-Based Response to Cross-Border Movements to Libya (Focus on the Tunisia/Libya border situation)*, 2023

Tunisia to the Libyan border, accompanied by “serious human rights violations committed on both sides of the border”.¹⁷⁴ **However, the humanitarian crisis the project addresses is not spontaneous but largely the result of the very same externalisation strategy that Italy and the EU are funding.** The strengthening of Tunisian migration governance – of which the EU-Tunisia Memorandum of July 2023¹⁷⁵ is the most visible expression – contributes to the pushback of migrants and deportations into the desert. In this context, protection interventions partly mitigate the humanitarian consequences of policies primarily oriented towards migration control and containment.

Other protection projects refer to onward movements, although the significance of this link should not be overstated. Some programme documents expect improvements in access to services and reception conditions to reduce pressures that may lead refugees and asylum-seekers to move onward. In Libya, for example, assistance in urban settings is presented as a way to reduce reliance on dangerous sea crossings and other harmful coping strategies.¹⁷⁶ In Sudan, the project document similarly notes that improving conditions in the first country of asylum may reduce subsequent irregular movements. These references show that mobility considerations can inform the rationale of protection programmes, but they do not, in themselves, establish that the interventions are primarily designed as deterrence measures.¹⁷⁷ Finally, some projects combine protection activities with return measures, while remaining framed within a broader humanitarian intervention. In the project *Enhancing Response Mechanisms and Assistance of Vulnerable Migrants in Tunisia*¹⁷⁸ awarded to IOM through the Incentive Fund, approximately €1.1 million

is allocated to emergency assistance and reception of vulnerable migrants, compared to approximately €4.9 million for assisted voluntary return.¹⁷⁹

The protection interventions analysed in this section are broadly consistent with ODA principles and respond to the concrete needs of displaced populations and host communities. This is particularly evident in contexts affected by protracted displacement, conflict and severe humanitarian needs, where support for reception systems, access to services and durable solutions remain essential components of development cooperation. The issue therefore does not lie in the legitimacy of these interventions as such, but in the broader policy environment in which they are implemented.

This is where questions of Policy Coherence for Development become particularly relevant. The EU and its Member States may simultaneously finance protection and inclusion measures in third countries while pursuing migration policies aimed at preventing onward movement, strengthening border controls or facilitating returns. Where these objectives overlap in the same country or region, tensions can emerge between the developmental purpose of cooperation and other strands of external migration policy. The risk is that protection assistance may increasingly be assessed, valued or mobilised also in relation to migration-control objectives.

A further dimension of this tension concerns the growing importance of the concepts of ‘safe country of origin’ and ‘safe third country’ in the European asylum system. Even protection interventions that are not directly linked to

¹⁷⁴ Ibidem.

¹⁷⁵ Tineke Strik and Ruben Robbesom, ‘Compliance or Complicity? An Analysis of the EU-Tunisia Deal in the Context of the Externalisation of Migration Control’, *Netherlands International Law Review*, vol. 71, 2024, <https://link.springer.com/article/10.1007/s40802-024-00251-x>; European Ombudsman, *Decision on how the European Commission intends to guarantee respect for human rights in the context of the EU-Tunisia Memorandum of Understanding*, Case OI/2/2024/MHZ, 21 October 2024, <https://www.ombudsman.europa.eu/en/news-document/en/194322>

¹⁷⁶ The Big Wall, ActionAid Italy, https://www.thebigwall.org/databasemedia/Final%20Narrative%20and%20Financial%20Report_Libya.pdf

¹⁷⁷ The Big Wall, ActionAid Italy, <https://www.thebigwall.org/databasemedia/Project%20proposal%20Sudan%20Countersigned%20-%20EUR%20500,000%20-%202015Jul20.pdf>

¹⁷⁸ The Big Wall, ActionAid Italy, *Enhancing Response Mechanisms and Assistance of Vulnerable Migrants in Tunisia*, 2022

¹⁷⁹ The Big Wall, ActionAid Italy, <https://www.thebigwall.org/database-media/403.1%20-%20Project%20proposal.pdf>

containment objectives operate within this wider regulatory context. Under Regulation (EU) 2024/1348, applications lodged by nationals of countries designated as safe countries of origin may be examined through accelerated procedures, while the safe third country concept can, under certain conditions, allow an application for international protection to be declared inadmissible without a substantive examination of the claim.

This matters because assessing whether a third country can be considered ‘safe’ depends, at least in part, on conditions that development cooperation may help improve, including access to registration, reception, healthcare, and protection services. Cooperation aimed at strengthening

these systems may therefore have consequences beyond its immediate developmental purpose. In principle, improved protection conditions are desirable and consistent with ODA objectives. At the same time, if those improvements are later used to support a country’s designation as ‘safe’, development cooperation can become indirectly linked to policies that restrict access to asylum procedures in Europe. This potential circularity raises a broader question of Policy Coherence for Development: whether measures intended to strengthen protection in partner countries remain consistent with the Union’s development objectives, given that their outcomes may also support more restrictive migration and asylum policies.

BOX 1. GENDER MAINSTREAMING

The NDICI Regulation requires that at least 85% of new initiatives have gender equality as a significant (G1) or principal (G2) objective. All NDICI-GE actions reviewed in this report are marked as G1, except two, which are marked as G0. Interventions marked as G1 need to make gender an important and deliberate objective, but not the main reason for the intervention (which would otherwise be marked as G2). These targets are also present in the EU Gender Action Plan (GAP) III,¹⁸⁰ adopted in 2021 and running until 2027, which commits to ensuring that 85% of all new actions across the EU’s external relations contribute to gender equality and women’s empowerment (GEWE).

Migration and forced displacement interventions mainstream gender in several ways to consider the specific needs of women and girls on the move. For instance, actions in the area of legal migration and root causes mainstream gender in line with the GAP III theme ‘*Promoting economic and social rights and ensuring the empowerment of girls and women*’ by providing tailored assistance to women and girls, reducing gender gaps, promoting women’s economic and social empowerment, and addressing gender discrimination. In the area of protection and forced displacement, attention is given to GBV response, health and SRHR, and participation of women and girls in education. Special attention is also given to unaccompanied minors and the need for child-focused protection and assistance. In some countries and regions, women and girls form a big part of the population of refugees/IDPs and need specific protection responses as they are at higher risk of SGBV, discrimination and other human rights abuses including trafficking. Similarly, reintegration and community-based projects aim to address the different roles attributed to women and men and foster women’s inclusive and equitable participation in decision-making processes.

In migration and border management, GEWE is linked to the Human Rights-Based Approach,

¹⁸⁰ European Commission and EEAS, Gender Action Plan III: towards a gender-equal world. (2020). EEAS. https://www.eeas.europa.eu/eeas/gender-action-plan-iii-towards-gender-equal-world_en

particularly by strengthening gender and age considerations in information campaigns, GBV response, equal participation in training programmes, gender-based awareness during training for border guards, and the collection of sex-disaggregated data. While the efforts to mainstream gender are welcomed and necessary to understand specific needs of women and girls on the move, it is important to question how certain interventions in their entirety might be detrimental to migrant women and girls' rights despite including gender-specific activities or indicators. For instance, border control operations foster a system of interceptions and violence that traps migrant women and girls in extremely vulnerable situations, including detention, and expose them to higher risks of SGBV and trafficking that can hardly be mitigated by gender-sensitive training for the Coast Guard.

While all Actions reviewed commit to ensuring that gender considerations are integrated in planning, implementation, monitoring and evaluations, these are mostly evident in projects dealing with protection responses or tackling root causes of migration, while in the other areas of intervention gender considerations are reflected in some indicators (for instance to track equal participation in trainings and other activities or gathering sex disaggregated data) but gender equality does not seem to be an important and deliberate objective in itself.

Of the Actions reviewed, the Action *Socio-economic integration of children and young people and protection of the human rights of groups at risk in displacement affected communities in Sudan*¹⁸¹ is the only one which included women as a priority target group, by focusing on women's leadership and participation across the project's different phases and engaging men and boys as allies in promoting gender equality and challenging harmful gender norms.

Overall, as previous research has shown, the EU primarily relies on gender-mainstreaming (G1) actions to advance GEWE in the external dimension, while G2 actions receive less support despite their greater transformative potential.¹⁸² At the same time, G1 actions can be marked inconsistently across EU Delegations, leading to some projects being marked as G1 *"while they are in reality gender-blind or only paying attention to gender in a superficial manner"*.¹⁸³ While a full analysis of the gender dimension of all NDICI-GE adopted actions on migration and forced displacement is beyond the scope of this analysis, the actions reviewed here overall confirm the findings of previous research, as none of them was tagged as G2, and the commitment to GEWE in those tagged as G1 can differ considerably.

4.2.2 - Root Causes Programmes

One of the main ways in which migration priorities have influenced the programming of development cooperation is through the growing use of the notion of *root causes*. **Interventions in traditional development sectors – from employment and training to basic services,**

livelihoods, and economic resilience – have grown to be associated with the objective of reducing migration and so-called irregular departures. The concept of 'root causes' has therefore provided a framework for linking development and migration policies and for assigning development cooperation a role in responding to migration.¹⁸⁴

¹⁸¹ European Commission, *Socio-economic integration of children and young people and protection of the human rights of groups at risk in displacement affected communities in Sudan*. DG INTPA, 2024. https://international-partnerships.ec.europa.eu/countries/sub-saharan-africa_en

¹⁸² CONCORD. Implementing the EU Gender Action Plan III: Turning ambition into impact? - CONCORD. 2023. <https://concordeurope.org/resource/implementing-the-eu-gender-action-plan-iii-turning-ambition-into-impact/>

¹⁸³ Ibidem.

¹⁸⁴ Cathrine Talleraas, *The Role of EU Development Cooperation in Addressing Irregular Migration in Africa*, European Parliament, Directorate-

This approach rests on the idea that migration decisions are shaped by a combination of economic, social, political, and environmental factors in countries of origin: poverty, unemployment, institutional fragility, conflict, food insecurity, lack of services, and climate vulnerabilities. From this perspective, traditional cooperation activities such as employment, training, local development, resilience, basic services, and institutional strengthening are incorporated into a broader causal chain, according to which improvements in living conditions should help reduce pressures to leave or encourage people to remain in their countries and regions of origin.

References to *root causes* can have different meanings. In some cases, interventions have an autonomous development objective, even if they may also indirectly affect migration. In others, reducing departures is an explicit objective, pursued through instruments traditionally used in development cooperation. In these cases, the aim is not to restrict migration directly but to influence the economic and social conditions perceived as contributing to the decision to migrate. The key distinction is therefore whether reducing migration is an intended outcome of the intervention, and whether it is pursued directly or indirectly. However, even where this link is explicitly built into programme design, there is limited evidence that such interventions can reliably reduce departures.

To understand how the link between development and migration is defined at the strategic level, the analysis of projects and resource allocation should be complemented by a review of the policy documents that set priorities and explain how development interventions are expected to affect migration. These documents show how different instruments and interventions are brought together under a common strategic

approach, as well as the challenges of translating the *root causes* approach into clear objectives and priorities. They also provide a basis for assessing which factors are identified as drivers of migration, which migration outcomes such interventions are expected to influence, which countries are prioritised, and the balance among migration management objectives, protection, legal pathways, and migration's contribution to development.

Strategic frameworks are also useful to assess the extent to which references to *root causes* have been translated into a programming criterion. **At the political and narrative level, the concept has been highly effective: it has linked migration priorities to a very broad range of traditional development cooperation interventions and mobilised resources, institutions, and actors towards that objective.¹⁸⁵ Its operational translation, however, has been more uncertain.** For the *root causes* approach to constitute a genuinely verifiable strategy, it is not enough to identify poverty, unemployment, conflict, or institutional fragility in generic terms as factors causing migration. Rather, one must specify which conditions the intervention seeks to change and how, which forms of mobility it targets, over what time frame, and based on which indicators. Without these elements, references to *root causes* tend to broaden the relevance of migration across very different areas of cooperation, without defining the expected contribution of individual interventions or the link between development outcomes and migration dynamics.¹⁸⁶

A particularly useful example for examining this translation at the programming level is the EU Emergency Trust Fund for Africa (EUTF). Established in 2015, the Fund brought together ODA resources into an instrument structured around four areas of intervention: economic

General for External Policies, 2025, [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485)

¹⁸⁵ Natascha Zaun and Olivia Nantermoz, "Depoliticising EU Migration Policies: The EUTF Africa and the Politicisation of Development Aid", *Journal of Ethnic and Migration Studies*, vol. 49, n. 12, 2023, <https://www.tandfonline.com/doi/full/10.1080/1369183X.2023.2193711>

¹⁸⁶ Disch, A., Garcia Femenia, A., Lawday, A., MacKellar, L., Poot, H., Larquemin, A., Brophy, P., & Yeo, S. (2020). Mid-term evaluation of the European Union Emergency Trust Fund for stability and addressing root causes of irregular migration and displaced persons in Africa 2015–2019: Final report. European Commission, https://www.oecd.org/derec/ec/evaluation-eutf-2015-2019-final-report-october-2020-volume-1_en.pdf

and employment opportunities, resilience, migration management, and governance and conflict prevention. The EUTF was among the first large-scale attempts to bring development and migration objectives into a common funding framework. It encompassed interventions addressing the economic and social conditions associated with the *root causes* of migration, alongside programmes focused on protection, return and reintegration, border management, and strengthening public administrations.¹⁸⁷

The Fund's experience, however, also highlights the limits of this integration. The mid-term evaluation identified tension between the EUTF's emergency, short-term nature and its ambition to address particularly complex structural problems. This resulted in a broad and flexible portfolio that was not always underpinned by a unified strategic framework or a sufficiently well-defined theory of change.¹⁸⁸ The European Court of Auditors subsequently confirmed that the objectives remained very broad, that funding decisions were insufficiently targeted, and that the knowledge generated about the drivers of migration had only limited influence on strategic decisions. It also found that monitoring systems did not determine which interventions had made a lasting contribution to addressing the *root causes of migration and displacement*.¹⁸⁹ The most recent impact analyses of the EUTF in the Horn of Africa show differentiated results depending on the contexts in which interventions were implemented. In Somalia and South Sudan, the *root causes* category was applied primarily to general development problems. In other contexts of forced displacement, it focused on integrating refugees and migrants and on cohesion with host communities. Evaluations identify results in terms

of access to services, resilience, and institutional capacity, but they do not establish a general, linear effect on migration flows. **This calls for a distinction between the results produced by the *root causes* approach in different areas of development and the much less demonstrated capacity to influence migration dynamics.**¹⁹⁰

This variety of approaches also emerges in the strategic documents through which countries define the relationship between migration and development cooperation. In some systems, migration objectives are formulated explicitly and directly influence resource allocation, partner selection, and priorities related to borders, returns, readmission, and interventions in regions of origin. In others, these objectives coexist with a broader understanding of the relationship between migration and development, which encompasses regular mobility, remittances, diasporas, protection, rights, and the circulation of skills. Finally, other systems remain primarily focused on leveraging the benefits of mobility and invoke *root causes* mainly in relation to forced displacement and reducing vulnerabilities. The key distinction, therefore, is not whether migration is included in development cooperation policies – which is now widespread – but rather how much importance it is given when setting aid priorities, and the extent to which it is translated into directly verifiable control objectives.¹⁹¹

On this basis, the following section analyses two complementary levels. The first concerns European and national strategic frameworks, examining how migration priorities and the *root causes* paradigm have been formalised within cooperation systems. The second concerns projects funded by the EU and Italy, in which

¹⁸⁷ Fogli, C., Majorano Sarapo, F., & Popp, S., Assessing the relevance and coherence of the root causes approach: Insights from the EU Trust Fund in the Horn of Africa. European Commission, Joint Research Centre, Publications Office of the European Union, 2025. <https://publications.jrc.ec.europa.eu/repository/handle/JRC143213>

¹⁸⁸ Disch, A., Garcia Femenia, A., Lawday, A., MacKellar, L., Poot, H., Larquemin, A., Brophy, P., & Yeo, S. (2020). Mid-term evaluation of the European Union Emergency Trust Fund for stability and addressing root causes of irregular migration and displaced persons in Africa 2015–2019: Final report. European Commission, https://www.oecd.org/derec/ec/evaluation-eutf-2015-2019-final-report-october-2020-volume-1_en.pdf

¹⁸⁹ European Court of Auditors, *EU Trust Fund for Africa: Despite new approaches, support remains insufficiently targeted*, Special report 17/2024: <https://www.eca.europa.eu/en/publications/SR-2024-17>

¹⁹⁰ Fogli, C., Majorano Sarapo, F., & Popp, S. L., Assessing the relevance and coherence of the root causes approach: Insights from the EU Trust Fund in the Horn of Africa. European Commission, Joint Research Centre, Publications Office of the European Union, 2025, <https://publications.jrc.ec.europa.eu/repository/handle/JRC143213>

¹⁹¹ H. Malm Lindberg and I. Luthman, eds., *Linking Migration and Development: European Experiences and Policy Lessons for Sweden*, EBA Report 2026:01, Expert Group for Aid Studies, Stockholm, 2026. <https://eba.se/en/reports/linking-migration-and-development-european-experiences-and-policy-lessons-for-sweden/23563/>

these policy orientations are translated into operational choices. This makes it possible to distinguish between initiatives with predominantly development-oriented objectives, general references to *root causes*, and interventions more clearly oriented towards containing mobility.

Migration and Development in European and National Strategic Frameworks

Before turning to the analysis of the EU and Italy, this section compares selected national experiences to capture the range of configurations the relationship between migration and development cooperation can assume. The analysis focuses on three aspects: how the *root causes* of migration and forced displacement are defined and articulated; the presence of a broader migration-and-development framework, which also encompasses the contributions of mobility, diasporas, and regular pathways; and how aid is linked more directly to migration objectives, such as prevention and deterrence of migration, border management, return, and readmission.

The **Danish strategy** takes an explicit, detailed approach to *root causes*. Poverty, inequality, institutional fragility, conflict, repression, lack of services and employment opportunities, and climate pressures are identified as factors driving forced displacement and migration. Accordingly, cooperation is expected to create conditions and ‘sustainable alternatives’ to departure in countries and regions of origin. This approach, however, does not form part of a comprehensive and balanced migration-and-development framework. While recognising the benefits of orderly migration and referring to the Global Compacts, mobility is considered primarily in terms of protection, forced displacement, and

controlling so-called irregular migration. The connection to migration-management objectives is particularly explicit: aid supports border control, managing migration routes, anti-smuggling, voluntary return and reintegration, and the strategy broadly states that long-term cooperation should not be provided to countries that refuse to readmit their own citizens.¹⁹² Conditionality is clearly formulated at the programmatic level, although in practice it appears less rigid, with dialogue and incentives playing a greater role.¹⁹³ This approach is consistent with the OECD’s 2021 peer review, which noted that the growing integration of objectives aimed at combating so-called irregular migration into Danish cooperation had already begun to affect ODA allocation, while also stressing the need to safeguard the integrity and coherence of ODA with development objectives.¹⁹⁴

In the **Netherlands**, references to *root causes* are present, but are framed primarily in operational terms. The focus is on improving reception, protection, education, employment, food security, and access to water in regions of origin or first asylum, with the expectation that better conditions will reduce movements towards Europe. This approach sits within a broader migration-and-development framework that also includes the contributions of diasporas and certain aspects of mobility. Still, in more recent policy orientations it appears increasingly dominated by the objective of migration management. The link to control objectives is explicit: cooperation supports countries of origin and transit in combating so-called irregular migration, smuggling and trafficking, strengthening border management, and facilitating returns; moreover, aid and other incentives can be used in migration partnerships to secure greater cooperation on readmission and returns.¹⁹⁵

¹⁹² Ministry of Foreign Affairs of Denmark, A changing world partnerships in development Denmark’s Strategy for Development Cooperation, Copenhagen, 2025. <https://um.dk/en/danida/strategies-and-priorities/>

¹⁹³ Jesper Bjarnesen, Frowin Rausis and Anja Simonsen, Solidarity at a Distance: Denmark’s Migration-Development Nexus in Policy and Practice, in Henrik Malm Lindberg and Iris Luthman, eds., *Linking Migration and Development: European Experiences and Policy Lessons for Sweden*, EBA Report 2026:01, Expert Group for Aid Studies, Stockholm, 2026. <https://eba.se/en/reports/linking-migration-and-development-european-experiences-and-policy-lessons-for-sweden/23563/>

¹⁹⁴ OECD, OECD Development Co-operation Peer Reviews: Denmark 2021, OECD Development Co-operation Peer Reviews, OECD Publishing, Paris, 2021, https://www.oecd.org/en/publications/2021/09/oecd-development-co-operation-peer-reviews-denmark-2021_b5cda735.html

¹⁹⁵ Arjen Leerkes, Melissa Siegel and Djamila Schans, Development Aid as a Tool in Migration Governance in the Netherlands: Uses, Effects, and Trade-offs, Henrik Malm Lindberg and Iris Luthman, eds., *Linking Migration and Development: European Experiences and Policy Lessons for Sweden*, EBA Report 2026:01, Expert Group for Aid Studies, Stockholm, 2026. <https://eba.se/en/reports/>

In **Sweden**, too, the migration component of development cooperation has recently been strengthened, marking a shift from a traditionally more rights-focused approach to one that emphasises poverty reduction and mobility's positive contribution to development. The 2024–2028 strategy now assigns aid explicit objectives relating to combating so-called irregular migration; increasing returns – including forced returns – and voluntary repatriation; supporting reintegration; and strengthening partner countries' capacities in asylum, migration, and border management.¹⁹⁶ At the same time, SIDA's sub-strategy maintains a broader migration-and-development framework, addressing the root causes of migration and forced displacement, safe, orderly, and regular migration, the protection of rights, support for host communities, and the inclusion of migrants and displaced people.¹⁹⁷ The result is a composite approach: development and protection objectives are combined with direct migration outcomes, while formally remaining within international obligations and OECD-DAC criteria, which exclude ODA interventions primarily intended to limit migration to the donor country.¹⁹⁸

Germany presents a multifaceted approach. References to *root causes* are explicit and primarily concern conflict, fragility, loss of livelihoods, and lack of opportunities, which are identified as drivers of forced displacement and so-called irregular migration. From this perspective, development cooperation is expected to create prospects in countries of origin, support host communities, and reduce pressures for onward movements. This approach, however, forms

part of a broader conception of the relationship between migration and development. Regular mobility is promoted through labour migration, skill circulation, remittances, and diaspora engagement. At the same time, development cooperation supports return and reintegration and accompanies partnerships that combine readmission, legal mobility, training, and institutional strengthening. The link with migration-management objectives is therefore explicit, but tends to be framed in terms of partnership, mutual benefit, and positive incentives rather than strict conditionality. This balance is pursued through a *whole-of-government* approach, embedded in a broader conception of cooperation as an instrument of security, stability, and foreign policy. Nevertheless, tensions remain between long-term development objectives and more immediate migration-related goals.¹⁹⁹

Spain maintains an approach centred on sustainable development, rights, and multilateral cooperation. The 2024–2027 Plan identifies conflict, poverty, inequality, lack of opportunities, and climate change as factors contributing to vulnerability and displacement, without presenting them as levers for reducing departures. Migration is incorporated into a broader framework encompassing safe and regular mobility, the protection of rights, strengthening partner countries' migration policies, and the protection of migrant children. Returns, readmissions, and border control, by contrast, do not appear central to the overall orientation of development cooperation.²⁰⁰

[linking-migration-and-development-european-experiences-and-policy-lessons-for-sweden/23563/](https://www.government.nl/themes/international-cooperation/development/refugees-and-migration/linking-migration-and-development-european-experiences-and-policy-lessons-for-sweden/23563/) See also: Government of the Netherlands, Refugees and Migration. <https://www.government.nl/themes/international-cooperation/development/refugees-and-migration/linking-migration-and-development-european-experiences-and-policy-lessons-for-sweden/23563/>
¹⁹⁶ Government of Sweden, New Strategy for Sweden's Global Development Cooperation on Migration, Returns and Voluntary Repatriation 2024–2028, Ministry for Foreign Affairs, 2024. <https://www.government.se/international-development-cooperation-strategies/2025/02/new-strategy-for-swedens-global-development-cooperation-on-migration-returns-and-voluntary-repatriation-20242028/>

¹⁹⁷ Swedish International Development Cooperation Agency (Sida), Sub-Strategy: Migration and Development in Development Cooperation 2024–2026, Sida, 2024. https://cdn.sida.se/app/uploads/2025/05/27082151/62772_Delstrategi-Migration_ENG.webb_.pdf

¹⁹⁸ Henrik Malm Lindberg and Iris Luthman, "Introduction", in Henrik Malm Lindberg and Iris Luthman, eds., Linking Migration and Development: European Experiences and Policy Lessons for Sweden, EBA Report 2026:01, Expert Group for Aid Studies, Stockholm, 2026. <https://eba.se/en/reports/linking-migration-and-development-european-experiences-and-policy-lessons-for-sweden/23563/>

¹⁹⁹ Anna Knoll and Pauline Veron, Germany's 'Whole-of-Government' Approach to Linking Migration and Development Cooperation, in Henrik Malm Lindberg and Iris Luthman, eds., Linking Migration and Development: European Experiences and Policy Lessons for Sweden, EBA Report 2026:01, Expert Group for Aid Studies, Stockholm, 2026. <https://eba.se/en/reports/linking-migration-and-development-european-experiences-and-policy-lessons-for-sweden/23563/> See also: Federal Ministry for Economic Cooperation and Development (BMZ), Migration. <https://www.bmz.de/en/issues/migration>; BMZ, Centres for Migration and Development; Federal Government of Germany, The German Government's 17th Development Policy Report: Development Policy in a Changing, Multipolar World, 2024. <https://www.bmz.de/en/news/development-policy-report-of-the-german-government>

²⁰⁰ Ministerio de Asuntos Exteriores, Unión Europea y Cooperación, Plan Director de la Cooperación Española para el Desarrollo Sostenible y la

In both the Belgian strategy and the French AFD's approach, as well as in Switzerland's sectoral guidelines, the focus remains on recognising migration as a component of development through rights, protection, regular mobility, inclusion, remittances, diasporas, and sustainable reintegration. However, the three approaches differ significantly.

Belgium adopts one of the most explicitly migration- and development-oriented approaches. While acknowledging the need to address the *root causes* of forced displacement, the strategy clarifies that it is not based on the assumption that development will automatically reduce migration; rather, it aims to make mobility a free and informed choice. Migration is situated within a broad framework encompassing governance, rights, safe and regular migration, mobility, diasporas, and sustainable reintegration. Consistent with this approach, Belgium explicitly states that development cooperation cannot be made conditional either on reducing so-called irregular migration or on return outcomes.²⁰¹ The OECD peer review confirms this orientation, noting a shift from an earlier emphasis on reducing migration towards an approach that aims to maximise its positive effects.²⁰²

France refers to *root causes* primarily in relation to crises, fragility, and forced displacement. At the same time, it situates migration within a broader conception of development that recognises the contributions of diasporas, regular and circular

mobility, the protection of rights, and sustainable reintegration. However, more recent development cooperation guidelines also include support to partner countries in combating so-called irregular migration, trafficking and smuggling networks. This is reflected primarily in efforts to strengthen civil registration systems and capacities to combat trafficking.²⁰³

Switzerland adopts an explicit *root causes* approach, linking migration and forced displacement to conflict, climate change, lack of opportunities, and inadequate services. Cooperation therefore focuses on preventing so-called irregular migration, protecting people, and creating sustainable prospects in countries of origin. This framework forms part of a broader migration-and-development approach encompassing safe labour migration, social inclusion, the protection of rights, remittances, investment, and diaspora contributions. At the same time, cooperation is strategically linked to migration policy through a *whole-of-government* approach and partnerships that include return, reintegration, and migration management.²⁰⁴ The most recent independent evaluation, however, indicates that coordination among federal actors and the practical implementation of the *whole-of-government* approach remain uneven and not equally developed across the portfolio.²⁰⁵

Norway presents an approach that is less explicitly oriented towards deterrence. Within current development cooperation and

Solidaridad Global 2024–2027, Madrid, 2024. <https://www.senado.es/web/expedientappendixblobServlet?legis=15&id1=18760&id2=1>; Malin Frankenhaeuser, Marion Noack, Alessia Bacchi, Niels Keijzer, Henrike Klavert and Anna Knoll, Migration and Development Policies and Practices: A Mapping Study of Eleven European Countries and the European Commission, International Centre for Migration Policy Development and European Centre for Development Policy Management, Vienna–Maastricht, 2013, section dedicated to Spain. <https://ecdpm.org/work/migration-and-development-policies-and-practices-a-mapping-study-of-eleven-european-countries-and-the-european-commission>; Ministerio de Inclusión, Seguridad Social y Migraciones, España reivindica ante Naciones Unidas la cooperación internacional frente a las políticas migratorias punitivas, 8 May 2026. <https://www.inclusion.gob.es/w/espaa-reivindica-ante-naciones-unidas-la-cooperacion-internacional-frente-a-las-politicas-migratorias-punitivas>

²⁰¹ Federal Public Service Foreign Affairs, Foreign Trade and Development Cooperation, Migration as a Driver for Sustainable Development: Strategy Paper, Brussels, <https://diplomatie.belgium.be/sites/default/files/2023-07/Strategy-paper-Migration-EN.pdf>

²⁰² OECD, OECD Development Co-operation Peer Reviews: Belgium 2020, OECD Publishing, Paris, 2020. https://www.oecd.org/en/publications/oecd-development-co-operation-peer-reviews-belgium-2020_026f1aad-en.html

²⁰³ Agence Française de Développement (AFD) and Migration, Paris, October 2024. <https://www.afd.fr/en/ressources/afd-and-migration>; Comité interministériel de la coopération internationale et du développement, Orientations de la politique de coopération internationale et de l'aide publique au développement, Paris, 2023. https://www.diplomatie.gouv.fr/files/files/le-ministere/rapports-plans-et-publications/documents-institutionnels/orientations_coop-apd.pdf

²⁰⁴ Swiss Agency for Development and Cooperation, *Global Programme Migration and Forced Displacement: Programme Framework 2022–25*, Bern, 2021. https://www.eda.admin.ch/publikationen/en/deza/diverse-publikationen/Globalprogramm_Migration_Vertriebung_Programmrahmen_2022_2025.html

²⁰⁵ Swiss Agency for Development and Cooperation, Independent Evaluation of SDC's Engagement in Migration and Forced Displacement (Period 2017–2024), Evaluation 2026/1, Bern, January 2026. <https://www.aramis.admin.ch/Default?DocumentID=74123&Load=true>

humanitarian policy frameworks, migration and forced displacement are addressed primarily through protection, humanitarian assistance, and durable solutions, with particular attention to coordination between humanitarian responses and development cooperation. At the same time, its return policy links cooperation with countries of origin to sustainable returns and reintegration,²⁰⁶ placing it within broader coordination among migration, foreign, security, and development policies.²⁰⁷

The European framework

The European framework presents two complementary ways of connecting migration and development cooperation. On the one hand, it considers migration as part of development processes, in relation to factors such as employment, access to services, social protection, local development, climate change, remittances, diasporas, and skills mobility. From this perspective, migration is not confined to specific programmes but is mainstreamed across the programming of different development cooperation sectors.²⁰⁸ On the other hand, development cooperation also plays a role in pursuing migration management and governance by strengthening border management and asylum systems, returns, anti-smuggling efforts, and cooperation with countries of origin and transit – specifically through the 10% migration and forced displacement target of NDICI-GE.²⁰⁹

Within this target, interventions classified as addressing *root causes* represent a relatively

small share, accounting for approximately 4% of the overall budget allocated to migration and forced displacement and are concentrated primarily in Sub-Saharan Africa and Asia. This may also reflect the Commission's effort to avoid inflating internal monitoring figures by attributing an excessively large share of ordinary development programming to *root causes*.²¹⁰

The NDICI-GE Regulation defines *root causes* contributions to the 10% target restrictively: it specifies that the target “*may include interventions addressing the root causes of irregular migration and forced displacement only when they directly address specific challenges related to migration or forced displacement*”.²¹¹ Classification, therefore, depends on the intervention's logic and the weight assigned to the migration objective in the project's design. This principle is operationalised through the migration marker (see Chapter 2).²¹²

To be counted in the marker, interventions addressing root causes require a precise link between the funded activity and a specific migration dynamic. In general, they receive marker 1 and therefore contribute 40% of their value to the target. Marker 2 is reserved for exceptional cases in which addressing root causes is the intervention's primary objective. Relevant factors include the decision to intervene in areas characterised by specific dynamics of departure, transit, displacement, or return, or the design of the intervention with the explicit objective of influencing the conditions that affect the ability, necessity, or decision to move. The link, therefore, cannot simply be inferred from the sector of intervention but must emerge from the

²⁰⁶ Ministry of Justice and Public Security / Ministry of Foreign Affairs, Return Strategy 2025–2030. <https://www.regjeringen.no/en/documents/return-strategy-2025-2030/id3087523/>

²⁰⁷ Jessica Schultz and Cathrine Talleraas, «Holistic, conditional or strategic support? The ambivalent interplay of Norwegian migration policy and development aid», in Henrik Malm Lindberg and Iris Luthman, eds., Linking Migration and Development: European Experiences and Policy Lessons for Sweden, EBA Report 2026:01, Expert Group for Aid Studies, Stockholm, 2026. <https://eba.se/en/reports/linking-migration-and-development-european-experiences-and-policy-lessons-for-sweden/23563/>

²⁰⁸ International Organisation for Migration, Integrating Migration into International Cooperation and Development: Guidelines for International Cooperation and Development Actors, Brussels, 2022. <https://publications.iom.int/system/files/pdf/Integrating-Migration-into-Int-Coop-and-Dev.pdf>

²⁰⁹ European Parliament and Council of the European Union, Regulation (EU) 2021/947 of 9 June 2021 establishing the Neighbourhood, Development and International Cooperation Instrument – Global Europe (NDICI–Global Europe), *Official Journal of the European Union*, L 209, 14 June 2021. <https://eur-lex.europa.eu/eli/reg/2021/947/oj?locale=it>

²¹⁰ Interview with representative from European Commission official, DG INTPA.

²¹¹ Regulation (EU) 2021/947 of the European Parliament and of the Council of 14 June 2021 establishing the Neighbourhood, Development and International Cooperation Instrument – Global Europe [2021] OJ 2 209/01. <https://eur-lex.europa.eu/eli/reg/2021/947/oj/eng>

²¹² Interview with representative from European Commission official, DG INTPA

programme's logic and the migration outcomes it seeks to produce and measure. However, despite these attempts to operationalise the *root causes* approach in programming, significant discretion remains: identifying interventions that directly address *root causes* is largely undertaken on a case-by-case basis and does not rest on a single, universally shared definition of what constitutes a *root cause*.²¹³

Compared with other systems, the distinctive feature of the European one lies in its attempt to translate the concept of *root causes* more systematically into strategic priorities, financial instruments, selection criteria, and monitoring mechanisms. From the EUTF for Africa to the NDICI, the EU has progressively sought to link development interventions more concretely to migration and forced displacement. This does not mean that the concept has been defined unambiguously or that its effectiveness has been demonstrated, but that its operational translation has been more systematically structured.

The inclusion of *root cause* interventions within the migration target can also be understood as an attempt to preserve space for ODA centred on development conditions in partner countries, alongside actions more directly aimed at controlling movements, managing borders, and facilitating returns. This helps prevent cooperation from being reduced to deterrence objectives alone. The tension between the two orientations, however, remains: even *root causes* interventions can be designed, funded, and evaluated primarily in terms of their contribution to reducing so-called irregular migration.

This tension was already evident in the debate surrounding the adoption of the EUTF²¹⁴ and subsequently the definition of the NDICI. In both cases, the role assigned to migration within development cooperation and the risk of its increasing subordination to migration-policy objectives were among the main areas of debate among European institutions, Member States, and civil society organisations.²¹⁵

A similar trend emerges in the Commission's proposal for the 2028–2034 Multiannual Financial Framework, in which external action is linked even more explicitly to the pursuit of the EU's strategic interests, security, resilience, and competitiveness, alongside traditional development objectives.²¹⁶ The 2025 OECD Peer Review situates this evolution within the broader repositioning of European cooperation towards mutual benefit and geopolitical objectives, also noting the growth in resources devoted to migration and border management, particularly in the Southern Neighbourhood.²¹⁷ The study commissioned by the European Parliament's DEVE Committee further shows that EU-funded interventions have often emphasised control over facilitating mobility, potentially creating tensions with development objectives and partner countries' priorities.²¹⁸ The European Parliament's resolution of June 2026²¹⁹ follows the same trajectory. While strongly reaffirming the priority of poverty reduction, human rights, and partner countries' development priorities, it continues to situate development cooperation within the European strategy to address the root causes of so-called irregular migration and manage migration. Alongside efforts to combat smuggling, the text also emphasises regular pathways, labour mobility, education, local

²¹³ Ibidem.

²¹⁴ CONCORD Europe & CINI, Partnership or Conditionality? Monitoring the Migration Compacts and EU Trust Fund for Africa. CONCORD Europe, Brussels 2018. https://concordeurope.org/wp-content/uploads/2018/01/CONCORD_EUTrustFundReport_2018_online.pdf

²¹⁵ CONCORD Europe, Recommendations on the Neighbourhood, Development and International Cooperation Instrument (NDICI): Building the EU's External Action Instrument 2021–2027, Brussels, 2019. https://concordeurope.org/wp-content/uploads/2019/09/CONCORD_MFF_Migration_Spending_Recommendations.pdf

²¹⁶ CONCORD Europe, Shaping International Partnerships: Budgeting Our Common Future, Position Paper, Brussels, 5 February 2025. <https://concordeurope.org/resource/shaping-international-partnerships-budgeting-our-common-future/>

²¹⁷ OECD, OECD Development Co-operation Peer Reviews: European Union 2025, Paris: OECD Publishing, 2025. https://www.oecd.org/en/publications/oecd-development-co-operation-peer-reviews-european-union-2025_7adcf387-en.html

²¹⁸ Cathrine Talleraas, The Role of EU Development Cooperation in Addressing Irregular Migration in Africa, European Parliament, Directorate-General for External Policies, 2025, [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2025\)754485](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2025)754485)

²¹⁹ European Parliament, *Risoluzione del 16 giugno 2026 sul rafforzamento della cooperazione allo sviluppo per affrontare i movimenti irregolari della popolazione e le loro cause profonde nei Paesi partner* (2025/2111(INI)), P10_TA(2026)0205, 16 giugno 2026. [https://oeil.europarl.europa.eu/oeil/en/procedure-file?reference=2025/2111\(INI\)](https://oeil.europarl.europa.eu/oeil/en/procedure-file?reference=2025/2111(INI))

entrepreneurship, and public infrastructure. The result is a broader and more balanced approach, but one that does not challenge the underlying assumption that development cooperation can contribute to the objectives of the EU's external migration policy.²²⁰

European root causes programmes

The total number of root cause actions considered under the 10% target to date is fairly limited: 15 in Sub-Saharan Africa (4 of which are under the Flexible Mechanism) and 2 in Asia. An example is the Action adopted in 2024, *Unleashing the potential of youth in West Africa*,²²¹ with a budget of €101 million and with migration marker 1. The Action is tagged under several DAC codes,²²² reflecting the wide range of activities covered and summarised in the table below:

TABLE 16. Unleashing the potential of youth in West Africa

Specific objectives	Indicative activities
» Reducing the gap between the skills of young people, including potential migrants and returnees, and labour market and business opportunities in West Africa in the field of the green economy. » Increasing labour inclusion and entrepreneurship of young people, including potential migrants and returnees, in the field of the circular and climate-neutral economy, with a particular focus on regions of departure and arrival	» Vocational/entrepreneurship/business training and development of TVET and apprenticeship programmes » Identifying labour market needs, particularly in areas of origin and return » Strengthening links between training institutions and entrepreneurship support services with state-owned reintegration structures » Capacity building of business development organisations and entrepreneurship support organisations » Information campaigns to increase the attractiveness and understanding of TVET programmes and inform youth and women about entrepreneurship opportunities » Involvement of diaspora to identify entrepreneurs and invest in small green, circular and low carbon businesses » Providing grants to promising businesses; providing capacity building and equity financing/seed capital or 0% interest loans to selected MSMEs, start-ups and local companies » Facilitating youth and women engagement and active participation in these programmes and policy discussions » Agricultural and agri-food skills development » Supporting enhanced productivity through improved agricultural service delivery and equipment » Identifying value chains and sub-sectors in key areas of departure and return that offer opportunities for youth to generate wealth, create jobs and enhance job quality » Facilitating youth access to market information

Source: European Commission, *Unleashing the potential of youth in West Africa*. Publications Office of the European Commission, 2024

These activities respond to four main outputs

²²⁰ Eva Baluganti, Aid is not a migration deterrent – it never should be, and here's why, EUobserver, 6 May 2026—<https://euobserver.com/214987/aid-is-not-a-migration-deterrent-it-never-should-be-and-heres-why/> (last accessed: 28 July 2026).

²²¹ European Commission, *Unleashing the potential of youth in West Africa*. DG INTPA, 2024. https://international-partnerships.ec.europa.eu/countries/sub-saharan-africa_en

²²² 25% - 32130 – Small and medium-sized enterprise development; 10% - 25030 – Business development services; 25% - 11330 – Vocational training; 15% - 31120 – Agricultural development; 25% - 24050 – Remittance facilitation, promotion and optimisation

that address the issues identified in the problem analysis:

- » Increasing competences of young men and women, including potential migrants and returnees, in line with private sector needs and the economic potentials identified in the field of circular and climate-neutral economy.
- » Increasing diaspora investments in the creation or growth of green, circular and low-carbon formal and informal enterprises in West Africa.
- » Increasing capacities of MSMEs linked to the green sector, with an emphasis on young and women-led businesses, to access technical support and finance.
- » Increasing availability of technical and financial support for green, circular and low-carbon value chains for job and income creation in key areas of departure and return

Youth is the main target of the Action. As the context analysis mentions, *“the young population in Western Africa is rapidly growing and expected to double by 2050, presenting significant economic opportunities but also potential challenges. If properly harnessed, this increase in the working age population could boost productivity and foster stronger, more inclusive green economic growth. However, maximising the advantages of the demographic dividend relies on accelerating job creation and developing human capital”*.²²³ Women and girls also face a higher risk of working in informal, low-paid, and vulnerable employment; therefore, several activities aim to specifically support the inclusion and empowerment of women and women-led businesses. The Action particularly targets ‘potential migrants’ and returnees and areas of origin or return, therefore making the project count as part of the migration target. The context analysis notes that *“lack of economic opportunity fuels conflict and instability, but also emigration”* both within the region and increasingly outside, and therefore the action aims to *“potentially reduce migration aspirations by providing better*

local prospects”.²²⁴ To a certain degree, a narrative of migration prevention is present in the context analysis; however, the indicators measuring the project’s success are not explicitly linked to migration deterrence, but rather, they measure results in terms of job creation, employability, support to MSMEs, number and participation in TVET trainings, etc. Therefore, while an element of deterrence is present in the project description, it does not appear to be the primary goal of the action and the activities are measured against indicators that appear to be aligned with the OECD guidelines, in particular Principle 3 and Criterion 3, clarifying ODA eligibility for projects with mutual benefits.

The “Root Causes” in Italian Cooperation Programmes

To reconstruct how Italy links its development cooperation and migration policy, it is necessary to consider the following documents:

- » Law No. 125 from 2014 (*General Framework for International Development Cooperation*) defines the general purposes and architecture of cooperation;
- » The AICS guidelines on the migration–development nexus specify the strategic approach in this area;
- » The *Three-Year Programming and Policy Guidance Document for Development Cooperation 2024–2026* from the Ministry of Foreign Affairs and International Cooperation sets out current political, sectoral, and geographical priorities;
- » the Migration Fund, the Incentive Fund, and the RELINT 2024 call for proposals show how these orientations are translated into financial instruments and concrete programmes.
- » Finally, the *Rome Process* and the *Mattei Plan* provide the political and strategic framework behind the root causes approach

²²³ European Commission, *Unleashing the potential of youth in West Africa*. DG INTPA, 2024. https://international-partnerships.ec.europa.eu/countries/sub-saharan-africa_en

²²⁴ Ibidem.

Comparing these documents does not reveal a unified policy. However, it allows us to identify the coexistence of a broad migration-and-development framework, an increasingly prominent focus on *root causes*, and funding instruments directly linked to preventing so-called irregular migration, as well as returns and readmissions.

Law No. 125 frames the relationship between migration and development cooperation within the broader objectives of reducing poverty and inequalities, protecting human rights, and promoting sustainable development. It provides that development cooperation should contribute to migration policies shared with partner countries and inspired by the protection of human rights and respect for European and international standards. The law also introduces a principle of policy coherence and entrusts the Ministry of Foreign Affairs and International Cooperation and the Interministerial Committee for Development Cooperation (CICS) with ensuring unity, coordination, and coherence among the activities of different public administrations.²²⁵ Migration therefore appears as an area of interaction with development cooperation, but is framed primarily in terms of local development, the role of migrant communities, partnerships with countries of origin, and the development of shared migration policies, rather than specific objectives for managing migratory movements.

The 2023 AICS Guidelines²²⁶ develop this approach through a relatively broad understanding of the migration–development nexus. The document is a strategic framework addressed to the Italian development cooperation system as a whole. Alongside migration governance and the protection of vulnerable people, it emphasises the contribution of regular migration, diasporas, remittances, labour and circular mobility, and

sustainable reintegration. It also proposes integrating migration into different areas of development, ranging from employment and services to agriculture and climate change. The Guidelines also cover border management, combating trafficking in persons and migrant smuggling, information campaigns, and returns. The criterion governing the use of ODA is the one established by the OECD-DAC: interventions may be financed with development cooperation resources when their primary purpose remains the development and well-being of partner countries, whereas activities that primarily serve the donor country's migration interests should be financed through other resources. The Guidelines thus present a broad framework for the migration–development nexus, in which areas directly connected to migration management coexist with components aimed at harnessing the benefits of mobility, such as regular migration, diasporas, remittances, and circular mobility. The focus on *root causes* emerges primarily through the integration of migration into the ordinary sectors of cooperation. Still, it remains general and has not been developed into an autonomous analytical framework or theory of change. Rather than resolving the tension between development and migration management, the document defines its strategic boundaries, leaving the OECD-DAC criteria to determine which interventions qualify as ODA.

The *Three-Year Programming and Policy Guidance Document for Development Cooperation 2024–2026*²²⁷ partially alters this balance, giving greater weight to root causes. Economic growth, human capital, employment, training, basic services, food security, climate adaptation, and institutional strengthening remain development objectives. Still, they are also understood as tools to reduce the drivers of migration. The Document identifies *root causes* as a cross-cutting theme of Italian

²²⁵ Law No. 125 of 11 August 2014, General Framework for International Development Cooperation, in particular Articles 1; 2(2), (3), and (6); 11; 15; 17; and 23–24. <https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2014-08-11;125>

²²⁶ Ministry of Foreign Affairs and International Cooperation – Directorate General for Development Cooperation and Italian Agency for Development Cooperation, Guidelines on the Migration–Development Nexus, presented to the Joint Committee on 9 June 2023. https://www.esteri.it/wp-content/uploads/2023/09/IMPAGINATO_LGMG_rev3.pdf

²²⁷ Ministry of Foreign Affairs and International Cooperation, Three-Year Programming and Policy Guidance Document for Development Cooperation 2024–2026, approved by the Council of Ministers on 20 June 2025. <https://www.esteri.it/wp-content/uploads/2025/07/DOCUMENTO-TRIENNALE-DI-PROGRAMMAZIONE-20-GIUGNO-2025.pdf>

development cooperation and explicitly links it to interventions under the Migration Fund and Incentive the Fund, alongside reintegration and the promotion of legal mobility channels. **The link with migration objectives has its greatest impact on the geography of aid: the priority given to Africa reflects development, stability, and foreign-policy considerations, but the Document repeatedly highlights the relevance of countries of origin and transit of migratory flows to Italy. Italian programming is therefore not wholly oriented toward reducing departures; however, this objective plays a clearer role in selecting territories and justifying interventions.**

Although the reviewed documents call for addressing root causes without offering detailed operational strategies or measurable objectives, this concept has gained political prominence amid the broader reconfiguration of Italy–Africa cooperation.

The *Rome Process*, launched at the International Conference on Development and Migration in July 2023, articulated an integrated approach to migration governance based on enhanced cooperation among countries of origin, transit, and destination. Its conclusions link support for partner countries' development, political stability, and socioeconomic resilience to the objective of addressing the root causes of forced displacement, expanding safe and regular migration pathways, and preventing and combating so-called irregular migration, human trafficking, and migrant smuggling. To translate these commitments into concrete action, the document envisaged developing an Action Plan and establishing a network of representatives from participating countries. The network was tasked

with meeting regularly to establish coordination mechanisms, facilitate policy dialogue, and monitor progress in implementing the Action Plan.²²⁸ In parallel, the *Mattei Plan*, presented a few months later at the Italy–Africa Summit in January 2024, placed this nexus within a broader strategy of economic, political, and financial partnership with African countries. The Plan identifies preventing and responding to so-called irregular migration, along with managing regular migration flows, as key areas of intervention, alongside its main sectoral priorities, including agriculture, food security, and the energy sector.²²⁹ The convergence between the *Mattei Plan* and the *Rome Process* resulted in common financing instruments. In 2024, a Joint Committee document linked both initiatives to a multi-donor fund managed by the African Development Bank, aimed at financing projects in countries of origin and transit along migration routes. In January 2026, the *Rome Process Steering Committee* approved 13 projects focusing on migration and security, economic development, and climate and energy.²³⁰ The *Rome Process* therefore appears to provide the political framework linking development cooperation to migration management, while the *Mattei Plan* extends this approach into a broader architecture for cooperation and the mobilisation of development resources. This integration further strengthens the alignment of development cooperation with Italy's strategic interests, including energy security and migration management. At the same time, it risks increasingly framing relations with African countries as an implicit exchange among development support, cooperation on migration control, and access to natural and energy resources.²³¹

Finally, the policy documents governing the

²²⁸ Ministry of Foreign Affairs and International Cooperation (MAECI), International Conference on Development and Migration, Conclusions, Rome, 23 July 2023, https://www.esteri.it/wpcontent/uploads/2023/07/Conclusioni_20230723_IT.pdf.

²²⁹ Chamber of Deputies and Senate of the Republic, *Draft Prime Ministerial Decree adopting the Italy-Africa Strategic Plan: Mattei Plan*, A.G. 179, Dossier No. 324, 23 July 2024, pp. 4–9, <https://documenti.camera.it/leg19/dossier/pdf/ES0217.pdf>.

²³⁰ Ministry of Foreign Affairs and International Cooperation (MAECI), *Meeting of the Steering Committee of the Rome Process on Development and Migration at the Farnesina*, 27 January 2026, <https://www.governo.it/it/node/32282>; Italian Government, *Third Annual Report to Parliament on the Implementation of the Mattei Plan*, 30 June 2026; Ministry of Foreign Affairs and International Cooperation (MAECI), *Meeting No. 4/2024 of the Joint Committee for Development Cooperation*, 28 June 2024, pp. 6–9, https://www.esteri.it/wp-content/uploads/2025/06/OdG_IV_riunione-2024.pdf.

²³¹ Daniele Fattibene, *The Mattei Plan for Africa: From Aid to Partnership? Recommendations for the 2026 Italy-Africa Summit*, IAI Brief, n. 25/05, November 2025.

Migration Fund, the Incentive Fund, and the RELINT 2024 call show how this strategic framework is translated into programming and financial instruments. They reveal three ways of integrating migration-related objectives into development cooperation.

The Migration Fund places protection and development interventions within a broader policy of the external management of migration movements, which also includes returns, assistance to authorities, and information campaigns.²³² RELINT 2024, by contrast, adopts a formally centred approach on *root causes*: it finances interventions within traditional development cooperation sectors, with the stated objective of addressing conditions associated with migration, while also including an explicit component on information campaigns and deterrence.²³³ The Incentive Fund establishes an even more direct link by financing interventions in areas related to migration management – some of which do not qualify as ODA – and by using eligible cooperation components as an incentive for partner countries to cooperate on returns and readmission.²³⁴

Therefore, at the Italian level, the use of development cooperation to support migration policy objectives involves multiple administrations and instruments. The Italian system is formally situated within a common framework for policy direction and coordination, but programming and implementation remain distributed among actors with different responsibilities, procedures, and approaches. Common policy directions coexist with more fragmented operational governance, making it difficult to reconstruct interventions as a coherent whole. This fragmentation is compounded by the limited availability of evaluations that jointly examine these instruments and assess the results in both development and migration-policy terms. Available analyses

remain largely confined to individual projects, while mechanisms such as the RELINT call are repeated over time without a public, structured evaluation of the approach adopted and the overall results achieved.

RELINT 2024 Call: The Involvement of Civil Society Organisations in Interventions Addressing Root Causes

The RELINT 2024 call by the Ministry of the Interior offers a useful lens for analysing how the root causes paradigm translates into programming. Addressed to CSOs, the call funds initiatives in ten African countries of origin and transit that combine activities such as socioeconomic development, vocational training, employment, entrepreneurship, protection, territorial development, food security, and the strengthening of basic services. These activities are linked to the stated objective of mitigating the causes of so-called irregular migration and preventing departures along the Central Mediterranean route. In addition, all projects must include information campaigns on the risks associated with migration.

The call's design matters because it links migration and development cooperation. Although the Ministry of the Interior participates in the Italian development cooperation system, it sets its own objectives and funding criteria based on its migration responsibilities and designates the prevention of irregular migration as one of the call's objectives. CSOs operating primarily in the fields of development, rights, and protection are entrusted with project design and implementation. Involving CSOs in partner countries may help design interventions more closely informed by local contexts. Knowledge of social and economic dynamics, vulnerabilities, and local stakeholders may allow organisations to

²³² Ministry of Foreign Affairs and International Cooperation, Ministerial Decree No. 4115/616 of 6 March 2020, Policy Direction for the Use of Migration Fund Resources, https://www.esteri.it/mae/resource/doc/2020/05/dm_4115_616_fondo_migrazioni_2020.pdf

²³³ Ministry of the Interior, Department for Civil Liberties and Immigration, RELINT 2024 Public Call, adopted by Decision No. 6065 of 2 July 2024, <https://libertaciviliimmigrazione.dlci.interno.gov.it/notizie/avviso-pubblico-relint-2024>

²³⁴ Ministry of Foreign Affairs and International Cooperation, Decree No. 4115/2737 of 24 December 2019, Policy Direction for the Return Policy Incentive Fund, 2019, https://www.esteri.it/mae/resource/doc/2020/02/decreto_fondo_di_premialit_per_le_politiche_di_rimpatrio.pdf

translate the general objective of addressing *root causes* into approaches that are more sensitive to the specific characteristics of different contexts. **However, the political framework within which the call is constructed constrains this. The objective of addressing *root causes* is explicitly embedded within a strategy aimed at preventing departures along the Central Mediterranean route.** Organisations must therefore develop interventions within a framework that defines the expected migration outcome in advance.

The following analysis of project proposals shows which *root causes* of migration CSOs identify, through which interventions they propose to address them, and what relationship they construct between development and the objective of preventing departures. The analysis asks two questions: first, how projects operationalise the *root causes* approach; second, how organisations address migration through narratives, objectives, and outcomes that go beyond deterrence, within a call that explicitly links root causes to preventing departures. **The analysis examines both the extent to which references to root causes and migration shape project structures and the extent to which they serve primarily to justify development activities.** Finally, the analysis considers whether the relationship between development and migration is constructed through an articulated theory of change or weakly substantiated causal links; whether mobility is represented primarily as a problem to be reduced or as a potential resource for development; and in which cases there is an explicit connection between development interventions, prevention of departures and deterrence objectives. This approach makes it possible to distinguish between proposals that introduce innovative elements, interventions in which the migration component remains marginal, and projects in which the logic of containment more substantially shapes the intervention design.

The analysis is based on 26 project proposals across nine African countries of origin and transit, with a combined value of approximately €36 million. The project proposals were analysed using

a common framework designed to distinguish the formal prominence attributed to migration from the substantive logic of the interventions. The mandatory information campaigns were also analysed separately to avoid automatically classifying the main intervention based solely on their presence. The methodological Annex (Annex 5) describes the criteria, assessment scales, and procedures used to assign the different classifications.

The first finding concerns the gap between the centrality attributed to migration in project formulation and its role in the operational content of the interventions. Looking at the main activities, only two projects appear to be built entirely around a migration objective. In most cases, the core of the intervention consists of activities related to training, labour-market integration, entrepreneurship support, agricultural development, protection, or access to services, which retain an autonomous development logic. In four proposals, the activities could have retained the same configuration even without the reference to migration. However, the migration dimension becomes more prominent when considering the overall architecture of the projects. In fifteen cases, migration is presented as a primary objective through a combination of different elements: the formulation of general and specific objectives; the selection of beneficiaries defined as potential migrants, returnees, and forcibly displaced persons; the inclusion of outcomes relating to reducing migration aspirations or propensity to leave; and the mandatory inclusion of information campaigns on the risks of so-called irregular migration. In some cases, the indicators also expect the project to affect migration flows or migration decisions.

This gap exists because migration does not always shape the content of interventions, but is often reflected in their objectives, beneficiary selection, indicators, and other call requirements. As a result, migration can be central to how a project is framed and presented yet have little influence on the selection and design of its main activities. In many cases, references to root causes primarily

serve a justificatory function. Issues such as unemployment, poverty, food insecurity, weak services, environmental vulnerability, lack of skills, and limited access to economic opportunities are linked to so-called irregular migration because the call requires this relationship. The proposals are often more robust in their analysis of sector-specific problems than in their reconstruction of migration dynamics.

None of the 26 initiatives develops a fully articulated theory of change that connects a specific migration dynamic, the factors influencing it, the envisaged activities, and the expected results. In twenty cases, such a link is present but remains linear: greater access to training, employment, income, services, or protection is expected to reduce the need, intention, or propensity to leave. In the remaining six cases, the reference to migration is even weaker. Many proposals present a clear operational logic for development but not a genuine theory of change regarding migration. Training, agriculture, entrepreneurship, child protection, civil registration, health, and access to services can yield important benefits for people and communities; however, they do not necessarily visibly alter migration trajectories. In several cases, indicators appropriately measure participation, skills, employment, or access to services but do not explain the mechanism by which these outcomes are expected to affect mobility decisions. In others, projects attribute to narrowly targeted interventions the capacity to alter national migration indicators, creating an evident mismatch between the scale of the activities and the expected change.

The role of family and transnational networks, individual and collective aspirations and capabilities, regional mobility strategies, inequalities in access to regular channels, and political and regulatory constraints generally remains underexplored. The analysis also gives little consideration to the possibility that improved economic conditions, skills, or available resources may reduce the desire to leave while simultaneously increasing the practical capacity to do so. The relationship between development and migration is thus presented as more direct

and predictable than the academic literature and evaluations of major European experiences, including the EUTF, suggest.

Alongside this operational weakness, some proposals present an even more problematic representation of so-called irregular migration. Departure is often described as the result of a lack of opportunities, a risky choice, or an outcome to be avoided; staying in the country of origin, by contrast, is treated as a positive outcome. Training, business support, and access to income are presented not only as development tools, but also as alternatives to migration and as means of reducing the propensity to leave. In these cases, the deterrence objective is not always stated explicitly, but emerges from the sequence linking the analysis, interventions, and outcomes: unemployment is identified as a cause of departure, local employment is proposed as the response, and a reduction in migration intentions or flows is treated as an indicator of success. So-called irregular migration is also frequently conflated with trafficking, smuggling, and exploitation, reinforcing a narrative of mobility primarily as an individual risk. At the same time, the lack of regular channels, the institutional production of irregularity, and the political conditions that make migration routes dangerous receive less attention.

This approach does not characterise all the projects analysed. In many cases, deterrence remains in the background, functioning primarily as compliance with the funding framework, while the activities retain recognisable objectives related to development, protection, and inclusion. In others, however, deterrence penetrates more deeply into intervention theory: development is also assessed in terms of its capacity to retain people, and reducing mobility becomes a desirable outcome despite the weak analytical foundations supporting this expectation.

Even more limited is the proposals' capacity to treat migration as a resource or lever for development. In sixteen projects, mobility is considered almost exclusively as a problem, a vulnerability, or a phenomenon to be prevented.

Eight contain elements pointing towards a more nuanced understanding – such as returning migrants, diasporas, skills acquired abroad, and regular or circular mobility – but these remain secondary or poorly integrated components. Only two proposals develop a relatively coherent intervention in which migrants, diasporas, and transnational networks play an active role in development processes.

Return and reintegration feature in fifteen projects, but only a minority link return to the valorisation of skills and experiences acquired abroad. More often, returnees are treated as vulnerable beneficiaries, people requiring reintegration, or witnesses to the risks of migration. Eleven proposals mention regular or circular mobility, but only three offer operational opportunities rather than simply information about its existence. Diasporas and remittances, present in eight projects, also generally play a marginal role.

The most interesting components emerge in the few cases where a broader view of mobility balances the *root causes* approach. These include training across countries, temporary returns, recognition of skills gained abroad, access to regular migration channels, and the involvement of diaspora groups. These approaches do not necessarily reject the goal of reducing migration, but they do not treat staying in the country of origin as the only positive outcome. Instead, they recognise that development and mobility can also support each other.

Overall, nine proposals clearly adopt an orientation towards containment and prevention of departures through development or protection instruments. Seven are sectoral or rights-protection interventions with an added migration

component, often to meet the call's requirements. The remaining ten occupy an intermediate position: the reference to *root causes* is significant, but rests on a simplified relationship between improvements in local conditions and a reduced propensity to leave.

This distribution shows that organisations did not uniformly adopt the framework established by the Ministry of the Interior. In several cases, they maintained autonomous objectives related to development, protection, and inclusion, only partially reinterpreting the prevention objective. At the same time, a minority used the call to construct a development intervention that fully treats migration as a resource. More often, organisations adapted recognisable sectoral proposals to the funding framework, incorporating beneficiaries potentially affected by migration processes, references to *root causes*, and migration-related outcomes that were not always supported by a fully developed analysis.

The overall result is therefore ambivalent. At the project level, many initiatives present theories of change that do not always clarify the mechanisms by which the proposed interventions are expected to translate into changes in migration dynamics. However, the political and narrative significance remains important: even strong sectoral interventions are situated within a framework in which development is expected to prevent migration, and remaining in the country of origin is presented as a desirable outcome. Therefore, even when these interventions have limited effects on migration in practice, they can still reinforce the idea that development aid should help keep people in their areas of origin.

TABLE 17. Main types of objectives and activities envisaged in the project proposals analysed under the Ministry of the Interior's RELINT 2024 call

Main objectives	Main types of activities	N. projects*
Employment, skills and local economic development as a response to the so-called root causes of migration	Vocational training; career guidance; job placement; support for self-employment and micro-enterprises; development of value chains; technical assistance; productive assets; access to credit	20
Protection, inclusion and access to rights and services	Protection of refugees, displaced persons and vulnerable groups; healthcare; education; civil registration; social and legal assistance; access to basic services	18
Return and reintegration	Support for economic and social reintegration; training; business support; psychosocial assistance; where envisaged, leveraging the skills of returnees	15
Regular and circular migration, and diaspora engagement	Guidance on regular migration pathways; educational or labour mobility; temporary returns; diaspora engagement; skills transfer	11
Information campaigns on irregular migration	Radio, television and social media campaigns; community and school meetings; forums; testimonies from returnees; information materials; engagement of media and local actors	26 (compulsory)

Source: Author's analysis of the project documents relating to the Ministry of the Interior's RELINT 2024 call, obtained through FOI requests, based on data from ActionAid Italia's The Big Wall Observatory.

*The categories are not mutually exclusive. The same project may fall under multiple types of objectives and activities.

Information Campaigns: Between Prevention, Deterrence, and the Construction of Migration Narratives

Migration information campaigns are communication interventions targeting 'potential migrants', their families, and communities in countries of origin or transit. Through public meetings, radio, television, social media, school activities, performances, and testimonies from returnees, they seek to disseminate information about the risks of irregular migration routes, the consequences of relying on smugglers, and opportunities for regular migration in areas of origin. Since the so-called 2015 migration crisis, these initiatives have grown more important in the EU's external action, emerging as relatively low-cost, easily replicable tools for influencing the

aspirations and decisions of potential migrants before departure.²³⁵

However, critical research has questioned a key assumption behind these campaigns: that people mainly leave irregularly because they do not know enough about the risks of the journey or have unrealistic expectations about life in destination countries. Research shows that people are often aware of the dangers but assess them in relation to local economic and political conditions, family responsibilities, personal aspirations, and the limited availability of regular migration channels. Institutional messages also operate within an already complex information environment, in which family networks, diasporas, social media, and people with migration experience may be considered more credible than authorities or

²³⁵ Florian Trauner, Omar N. Cham and Rosangela Caleprico, EU-funded Information Campaigns Targeting Potential Migrants: State of the Art, BRIDGES Working Papers, n. 3, 2022. <https://www.bridges-migration.eu/publications/eu-funded-information-campaigns-targeting-potential-migrants/>

externally funded organisations. In this context, isolating the effect of campaigns on actual migration decisions is particularly difficult.²³⁶

The analysis of the RELINT 2024 projects reveals different approaches. In approximately one-third of the proposals, communication focuses primarily on the dangers of the journey, trafficking in persons, migrant smuggling, and the difficulties encountered in destination countries, portraying so-called irregular migration primarily as a risky choice to be avoided. In the other initiatives, this approach is combined, to varying degrees, with information about rights and locally available economic and educational opportunities. Eleven projects also refer to regular or circular migration, although these references are rarely linked to concrete and accessible pathways.

A smaller number of proposals go beyond simply conveying messages about the risks of migration and include engagement with target audiences, analysis of their perceptions, and adaptation of communication to local contexts. In at least five cases, they include preliminary surveys of perceptions and information sources, forms of participation by young people or local stakeholders in defining the content, co-design workshops, or referral systems linking people to available services and opportunities. These are the most interesting elements because they enable messages to adapt to local contexts and connect information to concrete responses and barriers. Even in these cases, participation seems to focus more on how the campaign is carried out than on allowing participants to question its approach and objectives.

A strong asymmetry remains between the large audiences reached by communication activities and the much smaller number of people who can access the economic, educational, or mobility opportunities presented as alternatives.

Information about regular migration channels is also rarely accompanied by the creation of such pathways or by measures to ensure their accessibility. This contradiction also emerges from research on the local actors responsible for implementing the campaigns. While conveying the messages required by funders, returnees and local practitioners may question their effectiveness precisely because of the scarcity of employment opportunities and the difficulties of accessing regular migration. Their participation, therefore, does not necessarily amount to passive acceptance of donors' narratives but may instead take the form of adaptation, negotiation, and strategic use of the spaces created by programmes.²³⁷

Overall, in the projects analysed, information campaigns do more than provide information. They often connect activities such as training, business support, agriculture, protection, and access to services to the goal of preventing so-called irregular migration. Even when deterrence is not explicitly stated, these campaigns often present local opportunities as an alternative to leaving, implying that staying is the preferred option. The key issue is therefore not only whether campaigns change people's migration decisions, but also how they present migration: mainly as a result of limited information or individual opportunities, while giving less attention to restrictions on regular migration, inequalities between countries, and family and transnational strategies. Although evidence that these campaigns are effective is limited, they continue to play an important political and narrative role by linking development interventions and making the goal of reducing migration more visible.

4.3 - Incentives, flexible funding and conditionality

At the European level, the NDICI-GE instrument operationalised conditionality through the so-

²³⁶ Janina Tjaden, Sandra Morgenstern and Frank Laczko, *Evaluating the Impact of Information Campaigns in the Field of Migration: A Systematic Review of the Evidence and Practical Guidance*, IOM, Geneva, 2018. https://publications.iom.int/system/files/pdf/evaluating_the_impact.pdf; See also: Ilse M. S. Vammen, Sine Plambech, Ahlam Chemlali and Ninna Nyberg Sørensen, *Does Information Save Migrants' Lives? Knowledge and Needs of West African Migrants en Route to Europe*, DIIS Report, Copenhagen, 2021. <https://www.econstor.eu/bitstream/10419/249926/1/175012193X.pdf>

²³⁷ Katerina Glyniadaki, Nora Ratzmann and Julia Stier, *External Migration Management through Information Campaigns: Street-level Views and Practices in Senegal*, *Political Research Exchange*, vol. 7, n. 1, 2025. <https://www.tandfonline.com/doi/full/10.1080/2474736X.2025.2546325>

called ‘flexible incitative approach’ (see Chapter 2). This approach makes third countries’ cooperation on migration an integral part of the Instrument, aiming to reward countries that demonstrate a higher degree of cooperation to “*maximise synergies and apply the necessary leverage*”.²³⁸ Until now, this approach has been used to make additional funding available to countries that show effective cooperation on migration, in a formula often referred to as the ‘more for more’ approach or ‘positive’ conditionality.

The flexible incitative approach applies to funding under the geographic programmes and may be used across all geographic regions except the Americas and the Caribbean. Implementation varies by the DG managing the funds.²³⁹ In Sub-Saharan Africa, the flexible incitative approach has been implemented through the Flexible Mechanism (FM) – a pool of funding that can be allocated flexibly to complement actions in the country MIPs and offer selected partner countries an incentive to pursue specific efforts.²⁴⁰ €600 million has been allocated to the FM for the period 2021-2027. The first €200 million was allocated through the Action Document adopted in 2022 for the period 2022-2024, and the latest Commission Implementing Decision adopted in 2025 later topped it up, raising the budget to €520 million.²⁴¹ The purpose of the FM is “*to maximise EU leverage in migration discussions vis-à-vis Sub-Saharan African counterparts, based on a flexible and incentives-based approach while also respecting policy coherence for development, as well as foreign policy objectives of the Union*”.²⁴² The assessment of countries that can access the FM is based on the following factors:

- » the country is stepping up efforts to host migrants and/or displaced people, and people in need of international protection
 - » the country/region is reinforcing capacities on migration management and governance, including on management of forced displacement flows
 - » the country is showing substantial and sustained cooperation with the EU and its Member States on return, readmission and sustainable reintegration
 - » the country/region is willing to cooperate with the EU and its Member States to support well-managed legal migration or the implementation of the Global Compact on Refugees or durable solutions for refugees.
- Ultimately, however, selecting countries is a political decision.²⁴³ It stems from political dialogue between the EU and countries considered priorities for the factors listed above, and it allows the Commission to offer additional financial support to advance specific reforms, interventions, or policies deemed relevant. Importantly, this support should not be meant as a way to continue work that is already ongoing, or cover for unexpected events like aid cuts from other donors, which can be covered under other tools like the Emergency Cushion, but should be used as a way to encourage specific actions and cooperation with the EU.²⁴⁴ The FM can also complement ongoing programmes by funding migration-related activities which are not covered by the country MIP. As the Action Document clarifies, the financing will be managed flexibly to:
- » help and encourage partner countries of origin/transit/destination to manage migration and forced displacement challenges

²³⁸ Regulation (EU) 2021/947 of the European Parliament and of the Council of 14 June 2021 establishing the Neighbourhood, Development and International Cooperation Instrument – Global Europe [2021] OJ 2 209/01. <https://eur-lex.europa.eu/eli/reg/2021/947/oj/eng>

²³⁹ Catherine Woollard, Josephine Liebl, Laura Davis, Elena Casajuana, EU migration and asylum funds for third countries, European Parliament, 2022. [https://www.europarl.europa.eu/RegData/etudes/STUD/2022/737870/IPOL_STU\(2022\)737870_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2022/737870/IPOL_STU(2022)737870_EN.pdf)

²⁴⁰ Ibidem

²⁴¹ European Commission, Commission Implementing Decision of 2.12.2025 amending Implementing Decision C(2022) 7113 on the financing of the multiannual action plan in favour of Sub-Saharan Africa for 2022-2024- Part 1 as regards annexes 2 and 10, DG INTPA, 2025. https://international-partnerships.ec.europa.eu/countries/sub-saharan-africa_en

²⁴² European Commission, Action Document for the Flexible Mechanism for Migration and Forced Displacement. DG INTPA., 2022. https://international-partnerships.ec.europa.eu/countries/sub-saharan-africa_en

²⁴³ Interview with representative of European Commission, DG INTPA.

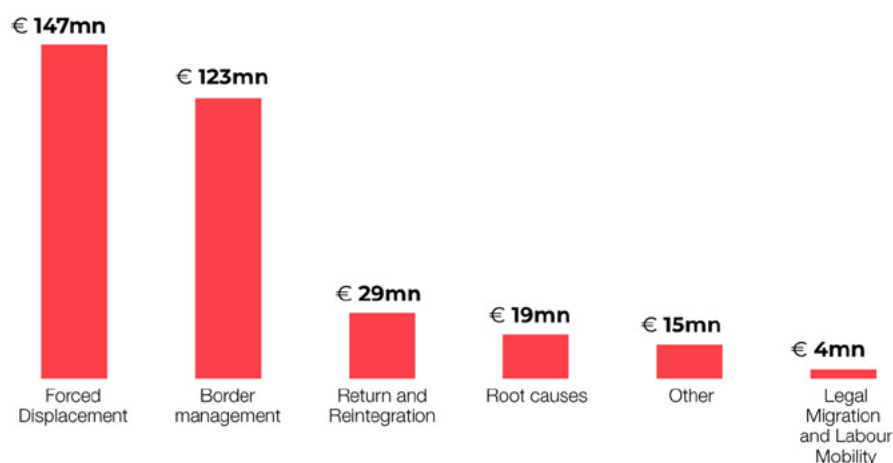
²⁴⁴ Ibidem.

- » adopt or implement policies that would merit further support
- » improve and expand countries' cooperation with the EU

To be eligible for funding under the FM, an activity must receive marker 2.²⁴⁵ The FM can support a variety of activities, going from nexus actions (such as service delivery and provision of immediate assistance and protection services, development of community-based programmes for hosting

displaced populations, vocational education and training opportunities and skills development, facilitating legal mobility of students and workers, creating education and job opportunities, reintegration support) to more security-oriented actions, like anti-smuggling, and technical assistance, capacity building and provision of relevant tools, equipment and/or infrastructure for migration and border management. Figure 24 shows how the budget has so far been allocated for the Actions adopted under the FM until now:²⁴⁶

FIGURE 24: Allocations by categories of intervention to the Flexible Mechanism for Sub-Saharan Africa 2021-2025. Total of adopted actions: €338 million²⁴⁷



Source: authors' elaboration of European Commission data present in the list of NDICI-GE actions that are part of the migration and forced displacement target.²⁴⁸

In other regions, the flexible incitative approach has been implemented differently. Specific provisions apply to the Neighbourhood region, as Article 20 of the NDICI Regulation provides, indicatively, that 10% of the financial envelope allocated for the Neighbourhood should be allocated through an incentive-based approach that considers countries' performance and progress on jointly

agreed reforms. These include democracy, good governance, rule of law, cooperation with civil society, human rights, gender equality, economic governance and cooperation on migration. In practice, this has been operationalised through regional programming with multi-annual regional MIPs that allow flexible funding allocation, which can vary year by year across countries.²⁴⁹ In North

²⁴⁵ European Commission, *Discussions held at the 4th, 6th and 7th Migration Coordination Group Meetings*, 2022. https://www.statewatch.org/media/4624/f_email-and-reports_17-june-16-november-and-24-november-2022.pdf?utm_source=chatgpt.com

²⁴⁶ See here for a full list of the Actions adopted under the Flexible Mechanism: NDICI-Global Europe Actions on Migration and Forced Displacement List of actions committed (Adopted decisions). (2026). In *DG INTPA*. European Commission https://international-partnerships.ec.europa.eu/document/download/7002229d-6be3-4efb-99b7-9fcb0ae665dd_en?filename=NDICI-Global%20Europe%20actions%20on%20migration%20and%20forced%20displacement.pdf

²⁴⁷ The graph accounts for the single Actions adopted under the Flexible Mechanism to date, which amount to €338 million. However, the total budget allocated to the FM so far is higher: €520 million approved, with €600 million in total over 7 years.

²⁴⁸ NDICI-Global Europe Actions on Migration and Forced Displacement List of actions committed (Adopted decisions), 2026. In *DG INTPA*. European Commission. https://international-partnerships.ec.europa.eu/document/download/7002229d-6be3-4efb-99b7-9fcb0ae665dd_en?filename=NDICI-Global%20Europe%20actions%20on%20migration%20and%20forced%20displacement.pdf

²⁴⁹ Interview with representative of European Commission, DG MENA.

Africa, for instance, the Multi-Country Migration Programme for the Southern Neighbourhood identifies an indicative programme of activities for the entire period 2020-2027 and an indicative budget allocation across four priority areas. However, there is no country-specific allocation, and this is where the flexibility lies – it allows the European Commission to adjust budget allocations by country across different years, based on countries' cooperation in the region, progress made on several fronts, and ongoing political dialogue with partner countries.²⁵⁰ At the same time, the variations in budget allocations do not represent large sums of money, as they remain within the overall programming framework of the Multi-Country Migration Programme for the Southern Neighbourhood. Therefore, they have helped maintain responsiveness to developments on the ground and support and reward partner countries where progress was ongoing, but their limited amounts have not been able to shift the needle or serve as strong incentives.²⁵¹

The *flexible incitative approach* has been a key feature of NDICI-GE, and the Commission Proposal for the next Global Europe Instrument maintained it.

Assessing its compliance with ODA rules is not straightforward: OECD guidelines on migration (Criterion 2) specify that development cooperation programmes can be part of a broader dialogue with a partner country, even when the dialogue aims to strengthen cooperation on migration. However, **if fund delivery is conditional on certain migration outcomes, it cannot qualify as ODA**. Therefore, while the functioning of the FM may appear to be ODA-aligned as the funding is made available in the framework of ongoing dialogues with partner countries, it is still a type of financing that is only unlocked

by the Commission when there's a positive assessment of the dialogue and cooperation on migration with a partner country. In the review of the activities reported under purpose code 15190, the OECD states that it *"finds it difficult to validate an activity's compliance with this Criterion to the extent that conditionality aspects are not necessarily part of a regular project description. It is therefore reliant on members proactively reporting on specific conditions and migration outcomes imposed"*.²⁵² This was also confirmed in conversations with the OECD, which emphasised that reaching agreement on Criterion 2 was extremely challenging, as conditionality is virtually never part of a project's description but can be negotiated during policy dialogues between donor and recipient countries – dialogues which, in themselves, are ODA-eligible.²⁵³ In response to this difficulty, the OECD has recently developed hypothetical scenarios to clarify the ODA eligibility of conditionality better.²⁵⁴ These scenarios make it clearer that while political dialogues, including on migration, are ODA-eligible, the type of project and the results of such dialogues determine ODA eligibility. If the dialogue leads to a jointly developed programme that responds to partner countries' development needs in addressing migration or forced displacement, then the programme is ODA-eligible. However, if funds are disbursed only when the partner country meets certain donor-country-set migration conditions, the project is not eligible.²⁵⁵

Therefore, while the functioning of the FM may appear to fall within a 'grey zone' in terms of ODA eligibility, it is ultimately the nature of the actions financed – and the broader migration cooperation framework in which they are embedded – that should be carefully assessed, as these determine whether the interventions genuinely align with development cooperation

²⁵⁰ Ibidem.

²⁵¹ Ibidem.

²⁵² DAC Working Party on Development Finance Statistics. (2025). Update to the review of the activities reported under Purpose Code 15190 on the Facilitation of Orderly, Safe, Regular and Responsible Migration and Mobility. In *OECD* (DCD/DAC/STAT(2025)9/FINAL). Retrieved January 2, 2026, from [https://one.oecd.org/document/DCD/DAC/STAT\(2025\)9/FINAL/en/pdf](https://one.oecd.org/document/DCD/DAC/STAT(2025)9/FINAL/en/pdf)

²⁵³ Interview with a representative of the OECD.

²⁵⁴ Organisation for Economic Co-operation and Development (OECD), Development Assistance Committee (DAC). *ODA Casebook on Activities in the Field of Migration*. DCD/DAC/STAT(2023)34/FINAL. Paris: OECD, 2026, [https://one.oecd.org/document/DCD/DAC/STAT\(2023\)34/FINAL/en/pdf](https://one.oecd.org/document/DCD/DAC/STAT(2023)34/FINAL/en/pdf)

²⁵⁵ Ibidem.

objectives. In particular, Principles 2 and 3 of the OECD guidelines on migration stress that ODA should not be diverted to promote donor countries' immediate political interests, and that projects that promote mutual benefits qualify as ODA only when their primary goal is to address partner countries' development needs and priorities. In this sense, some of the actions that can be supported by the FM, especially in the area of migration, border management, counter-smuggling, anti-trafficking and returns, are especially critical, since – as shown in the previous sections – these are normally the areas of intervention where we see a recurring pattern of ODA deviation towards donor countries' interests of curbing migratory flows.

Lastly, conditionality is becoming central to ongoing negotiations on the next Global Europe Instrument, where discussions around 'positive' and 'negative' conditionality are heavily shaping the political debate. **If 'positive' conditionality is already present in NDICI-GE through the flexible incitative approach – albeit with its controversies – negative conditionality constitutes a totally new provision, and one that clearly falls beyond the boundaries of ODA.** The Global Europe proposal presented by the European Commission in July 2025, for the first time, foresees the possibility of suspending payments or implementing programmes for countries that do not cooperate on readmissions.²⁵⁶ This would clearly depart from ODA rules, as it would impose the EU's agenda on returns and readmissions as a condition for receiving development assistance. This would explicitly link fund delivery to cooperation on returns, thereby making the funds non-ODA-eligible by contravening Criterion 2 and the newly developed hypothetical scenarios.²⁵⁷ Lastly, beyond ODA eligibility, this type of conditionality also shows incoherence in the EU's external action, which, on the one hand, claims to pursue partnerships

based on shared priorities and, on the other, imposes its external agenda on returns.

Despite these controversies, conditionality has become a central feature of the EU's development cooperation and migration policies, intersecting with political relations among countries, domestic political pressures, different operationalisation modalities, and technical ODA compliance issues. **Whether more or less explicit, linking access to resources to cooperation on border control, returns, or readmissions clearly risks shifting the focus of development assistance away from partner countries' priorities and toward donors' migration objectives, with implications for both ODA eligibility and policy coherence.** This issue is particularly salient in the negotiations on the next Global Europe Instrument, where the proposed 'negative' conditionality could have harmful local effects, restrict partner-country ownership, and reinforce existing power asymmetries. As negotiations progress, the debate over conditionality will therefore be critical in determining both the future architecture of EU external financing and its coherence with development objectives and ODA rules.

²⁵⁶ See: Proposal for a Regulation of the European Parliament and of the Council establishing Global Europe [2025] COM/2025/551 final: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52025PC0551&qid=1753799711782>

²⁵⁷ See in particular Hypothetical Case 2, where Country A provides funding to Country B, but the provision of funds is suspended should Country B not comply with the individual provisions on readmission specified in the agreement. The Case is deemed non-ODA eligible. Organisation for Economic Co-operation and Development (OECD), Development Assistance Committee (DAC). *ODA Casebook on Activities in the Field of Migration*. DCD/DAC/STAT(2023)34/FINAL. Paris: OECD, 2026, [https://one.oecd.org/document/DCD/DAC/STAT\(2023\)34/FINAL/en/pdf](https://one.oecd.org/document/DCD/DAC/STAT(2023)34/FINAL/en/pdf)

5 - CONCLUSIONS

The report shows that development cooperation has become firmly embedded in the external dimension of the European Union's and Italy's migration policies. In the programmes analysed, development cooperation finances protection, development, and reintegration interventions, but it also supports border control, returns, and capacity-building for authorities in partner countries. This integration of development cooperation with objectives aimed at containing mobility raises two distinct, although interconnected, concerns: aid diversion and migration conditionality.

We distinguished between two interpretations of aid diversion. The first concerns resources classified as ODA even though they are allocated to activities outside the relevant ODA perimeter defined by OECD-DAC guidelines. This includes activities primarily focused on border control, interception, or returns, as well as funding conditional on achieving specific migration-related goals.

The second concerns a broader form of diversion, linked to the political function of development cooperation. This includes interventions whose sectoral characteristics are compatible with ODA eligibility but are designed or assessed according to a deterrence logic. In such cases, resources finance activities formally attributable to development but directed toward objectives aimed at containing mobility. Here, diversion concerns the function of aid and affects interventions' priorities, beneficiaries, and expected outcomes. This second interpretation does not constitute a separate category under OECD-DAC rules, but it shows how political priorities can affect development cooperation objectives.

Migration conditionality operates through a distinct mechanism: it links access to, continuation of, and the amount of funding to the partner

country's cooperation on returns, readmission or border control.

The development impacts of externalisation policies represent an important dimension of their overall assessment. Measures aimed at controlling mobility can restrict movements essential for accessing employment, public services, and support networks. At the same time, cooperation and other forms of assistance provided to partner countries may channel financial resources and institutional capacity towards migration management, potentially reducing the resources available for locally identified development priorities. Moreover, when territories or beneficiaries are selected primarily because of their relevance to migration flows, development resources may increasingly be used as instruments of migration control. This potential tension between migration management and development objectives raises important questions about Policy Coherence for Development. Assessing such policies, therefore, requires looking beyond the formal classification of individual interventions and examining whether their objectives, instruments, and outcomes align with partner countries' development priorities and the Sustainable Development Goals.

The mapping of funding instruments shows that the link between development cooperation and migration management is embedded differently in the European and Italian systems. In the European Union, the NDICI–Global Europe instrument includes migration among its objectives and allocates an indicative share of programming to migration management and governance. Development cooperation is one of the main channels through which the EU funds interventions related to borders, returns, reintegration, and so-called root causes. In Italy, this link operates through a range of different instruments: some are dedicated funds, such as the Africa Fund, the Migration Fund and the Incentive Fund for Return Policies; others finance migration-related

interventions through broader budget lines or expenditure frameworks, such as Chapter 2371 and resources allocated through the Missions Decree. Taken together, these instruments have progressively incorporated cooperation into the external dimension of migration policy. The result is an overlap between cooperation instruments and migration instruments, particularly evident in funds that combine development support, protection and mobility management. This configuration makes development cooperation an integral part of external migration action and raises the question of which function takes precedence in individual interventions.

European and Italian external migration action continues to be financed and implemented without adequate safeguards for assessing risks and impacts on human rights and development in advance. At the European level, the recently introduced due diligence procedures still do not clarify how reports of violations should be examined, what measures should be adopted to mitigate risks, or when support should be suspended. The new MFF should therefore make funding conditional on clear obligations for human rights assessment, monitoring, and reporting, and should give the European Parliament effective tools to scrutinise and challenge decisions on higher-risk funding. In Italy, no legal framework imposes equivalent obligations regarding the provision of funding, equipment, and training to authorities in third countries. Incomplete publication of documents, restrictions on access and the Parliament's limited powers further reduce the possibility of scrutinising decisions. Italy should likewise adopt a common due diligence framework covering all funding, equipment transfers, and training activities directed towards third-country authorities, providing for prior assessments, monitoring of interventions, and suspension of support where risks cannot be adequately mitigated. Document transparency and prior parliamentary scrutiny should complete this system.

The quantitative mapping shows that resource distribution varies substantially across geographical areas and instruments. Overall, under

the migration objective of NDICI–Global Europe, resources are concentrated on protection (48%), forced displacement (25%), migration and border management (25%), and returns and reintegration (14%), while interventions addressing root causes account for 4%. The aggregate figure, however, conceals significant differences. In North Africa, border control absorbs 51% of resources and returns and reintegration a further 21%, whereas in Sub-Saharan Africa interventions addressing forced displacement predominate. In Italy, too, the composition varies across instruments: the Migration Fund focuses on protection, while the Incentive Fund for Return Policies allocates more than 60% to border management. The distribution of expenditure therefore points to different operational priorities, linked to countries' positions along migration routes and to the functions assigned to individual instruments. The classification makes it possible to reconstruct and compare these allocations, but the boundaries between categories often remain unclear: many projects combine protection, migration management, border control and development activities. For this reason, aggregate analysis must be complemented by an examination of individual interventions and of the activities that concretely determine how resources are used.

Migration, border management, and return and reintegration programmes are the areas in which aid diversion is most clearly apparent. The projects analysed often combine training, the provision of vehicles and equipment, surveillance, Search and Rescue, anti-smuggling activities and support to border authorities. References to human rights and protection do not necessarily alter the predominant function of these activities, particularly when indicators measure strengthened operational capacities, interceptions, or returns. In return and reintegration programmes, protection and assistance are also embedded within arrangements aimed at reducing arrivals and organising return along migration routes.

Protection and forced displacement programmes, by contrast, are broadly consistent with ODA objectives and respond to concrete needs. Their

function can nevertheless be redefined by the migration framework in which they are embedded, particularly when assistance is linked to reducing subsequent movements or strengthening control systems. In interventions addressing root causes, the relationship between improving local conditions and reducing departures often rests on simplified causal assumptions and on migration outcomes that are difficult to demonstrate. Information campaigns and legal migration initiatives also contribute to this approach, albeit in different ways. The former tends to present so-called irregular migration primarily in terms of the risks and negative consequences of departure; the latter account for a residual share of funding and, in only a few cases, provide genuinely accessible channels, including those related to the alternatives to departure presented by information campaigns. Overall, the analysis shows that the main policy question concerns the function assigned to interventions: development, protection and mobility can constitute autonomous objectives of cooperation aimed at supporting the development of local communities, or they can be subsumed within a broader logic of preventing and containing mobility.

The NDICI-Global Europe *flexible incitative approach* has introduced a direct link between the allocation of resources and the level of partner countries' cooperation on migration. The *Flexible Mechanism* makes this link particularly evident: access to funding depends on a political assessment that considers, among other factors, cooperation on returns and readmission, the containment of irregular migration and the strengthening of border management. As the Italian case also shows, however, conditionality is often defined through political dialogue and is not reflected in project documentation, creating a grey area regarding ODA eligibility. The proposed new Global Europe framework introduces the possibility of suspending funding to countries that do not cooperate on returns and readmission. Negative conditionality would make explicit the subordination of cooperation to migration objectives. It would be incompatible with the principle that ODA should primarily promote partner countries' economic development and welfare and respect their ownership. The new

MFF should therefore exclude this possibility and maintain a clear distinction between incentives for migration cooperation and funding intended for development.

In conclusion, the analysis documents a significant use of development cooperation resources for objectives aimed at containing mobility. The issue concerns not only the scale of funding and the plurality of instruments used, though these are important. It is also necessary to consider the role that externalisation policies assign to development cooperation and the effects these policies have on the economic, social and institutional conditions of partner countries, as well as on the opportunities and costs associated with mobility.

Indeed, the relationship between mobility and development necessarily broadens the scope of external migration policies. Economic, social, institutional, and environmental conditions help shape the forms and directions of mobility, while movements themselves can, in turn, affect development processes in the territories concerned. This does not mean that development depends exclusively on cooperation: trade, financial, climate, and investment policies also affect the structural factors that shape mobility. Within external migration action, however, development cooperation remains one of the main instruments through which partner countries – many of them low-income countries – are engaged on the socioeconomic, institutional and environmental conditions that influence mobility and on its consequences. Its structural role in externalisation therefore derives from its capacity to extend migration action beyond direct border control and intervention in flows, and to address the socioeconomic, institutional and environmental dimensions of mobility, including when these are framed within the deterrence paradigm as means of containing movement.

The proposals and positions put forward so far regarding the 2028–2034 financial framework suggest that development cooperation will remain a significant instrument of external migration policy. Measures aimed at addressing the root causes of migration, as well as those focused

on protection, are also likely to remain integral to this policy architecture. The former reflects the logic of the deterrence paradigm, which holds that efforts to influence migration patterns must address the underlying conditions that shape mobility. The latter stems from the pressing needs of displaced people and their host communities, as well as the impact of containment measures, which can create or exacerbate vulnerabilities.

The structural involvement of development cooperation in external migration policies requires a paradigm shift. External migration policy should take development objectives and the effects of mobility on partner countries as criteria for defining its priorities. Today, in some instruments and programmes, the opposite occurs: objectives aimed at preventing departures and securing cooperation on returns shape the use of development cooperation and determine its priorities. Cooperation must therefore retain its own development objectives, even when addressing mobility. This requires moving beyond the assumption that development automatically reduces migration. The relationship is more

complex: the same economic and social changes can reduce some pressures while simultaneously increasing the resources and aspirations necessary to migrate. A decline in departures may also result from mobility constraints rather than improved living conditions. Interventions should therefore be assessed according to their effects on people's opportunities and conditions, both for those who leave and those who remain, rather than solely based on reductions in migration flows.

This paradigm shift must begin with a change in perspective: migration should be understood from the experiences and priorities of countries of origin and transit, rather than solely through the categories and interests of donors in the Global North. This entails recognising partners and local actors as having a genuine role in defining policies and managing resources and programmes. From this perspective, mobility could be a resource for local development, and cooperation could help create conditions that enable people to choose whether to stay or migrate.

ANNEX

Annex 1: OECD-DAC guidelines on the eligibility of migration actions under ODA parameters

PRINCIPLES

- 1 The primary objective of ODA – in migration as in general – is to promote the economic development and welfare of developing countries.
 - 2 ODA should not be diverted to provider countries' immediate interests in migration. Authorities responsible for reporting ODA must assess the primary objective of migration-related programmes.
 - 3 Although benefits to provider countries do not exclude ODA eligibility, development cooperation should not be used as a tool to promote the provider's domestic migration agenda. It is the responsibility of DAC members to provide a clear justification for ODA eligibility.
 - 4 Migration-related ODA activities must comply with development and humanitarian objectives and principles, human rights, the SDGs, and the 2030 Agenda.
 - 5 Activities that primarily benefit countries or organisations eligible for ODA and that promote safe and regular migration pathways, or address irregular and unsafe migration, without promoting the donor country's domestic migration agenda, and that protect people's lives and human rights, are eligible as ODA.
 - 6 Activities that intercept and return migrants, with the main objective of restricting migration to provider countries, are excluded from ODA.
-

CRITERIA

- 1 Projects that are not in line with applicable international law and frameworks, such as the Global Compact for Migration and the Global Compact on Refugees, as well as the SDGs, are not eligible.
 - 2 Development co-operation programmes can be part of a broader policy dialogue with the beneficiary country, including in the field of migration. Development funds might, e.g. make the developing country more willing to co-operate in the return and readmission of rejected asylum seekers and irregular migrants. However, if the delivery of funds within an activity is subject to specific conditions on migration outcomes, the funds are not reportable as ODA unless it can be demonstrated that the conditions imposed primarily contribute to the promotion of the economic development and welfare of developing countries, and not primarily to the donor's domestic migration concerns.
 - 3 To help identify the main objective of projects that provide mutual benefits to the provider and recipient countries, consider the expected development-enhancing results of the interventions, as well as the projects' objectives and corresponding results indicators. The overall framework and narrative underpinning the activity must also be assessed. For example, when evaluating ODA eligibility, it is useful to consider:
 1. Whether the project narrative makes explicit references to the provider country's migration interests, for example by referring to "migration pressures," "crises," etc.
 2. Whether the intervention aims to limit migration.
 3. Whether the intervention provides a short-term response rather than aiming to promote sustainable, long-term development.
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- 4 Interventions focused on irregular migration and border management can generate mutual benefits for both provider countries and developing countries. However, the primary rationale for such cooperation may not always be clear. The distinction between activities that are eligible and ineligible as ODA in the field of border management is determined based on their primary objective:
1. Eligible as ODA:
 - a. Civilian activities that strengthen the capacity of developing countries to improve the administration of measures relating to the movement of people and goods, such as activities promoting good governance best practices (e.g. document verification and anti-corruption measures); activities aimed at protecting the human rights of migrants; and activities promoting safe, orderly and regular migration (e.g. awareness-raising campaigns, social and health services, and the provision of safety, medical or humanitarian assistance).
 - b. Capacity-building activities aimed at deterring, preventing and combating migrant smuggling or trafficking in human beings, where the primary objective is to protect migrants from abuse.
 - c. Cooperation and capacity-building between provider and developing countries in the areas listed above.
 - d. Rescue operations when this constitutes the primary purpose of the operation. If the primary purpose is border patrolling, protection and surveillance, these activities do not qualify as ODA. Only the additional costs associated with the SAR operation may be counted, since ODA cannot cover the regular costs of coast guard activities, which the respective states must in any case bear.
 2. Not eligible as ODA:
 - a. Activities supporting border authorities where the primary objective is to limit migration to the provider country.
 - b. Border-control projects, such as border control and surveillance activities aimed at containing migration (e.g. construction of a wall, installation of barbed wire, interception and return of migrants). Activities directly linked to the military or to lethal actions by security forces, or involving military territorial and border surveillance, such as armed drones or patrols, are also excluded.
 - c. Training for border guards and development of the administrative capacities of border patrols, etc., except where these activities support the types of activities listed above that are eligible as ODA.
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- 5 Assistance to forced returns is excluded from ODA. For other returns, the eligibility depends on the country of departure.
1. Assistance to migrants for their safe, dignified, informed and voluntary return to their country of origin is eligible in the case of returns from another developing country.
 2. For costs of return from provider countries, as well as expenditures for return and reintegration incurred in provider countries (pre-departure assistance), the rules on in-donor refugee costs apply
-
- 6 Sustainable reintegration programmes qualify as ODA if they primarily focus on the economic development and welfare of developing countries. Reintegration activities undertaken in countries of origin are, in principle, ODA-eligible, irrespective of the status of returnees (forced or voluntary). Reintegration support that exclusively targets returnees from the provider country may be considered eligible only if it is demonstrated to enable sustainable reintegration and not primarily to address the donor's domestic migration concerns.
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- 7 Activities that focus on providing access to decent labour opportunities, protecting migrants' rights, preventing abuse and exploitation, or improving migrants' overall labour situation in ODA-eligible countries are ODA-eligible. Activities that foster labour mobility from ODA-eligible countries to non-ODA-eligible countries may also be eligible, provided the primary purpose is to benefit developing countries.
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- 8 Engagement with diaspora in provider countries without a clear developmental or humanitarian aim for the primary benefit of the origin country, and/or promoting the provider countries' domestic migration agenda is not eligible.
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Annex 2: Note on methodology and data for the analysis

The report is based on extensive desk research and interviews with key stakeholders. The research took place from January 2025 to August 2026.

Stakeholders interviewed for this research include personnel of the European Commission, in particular DG INTPA and DG MENA, and staff of the Greens/EFA group in the European Parliament whose insights were crucial to understanding the functioning of the NDICI-Global Europe Instrument. Personnel from the OECD were also interviewed to gather key insights into the questions of ODA eligibility of migration actions. At the Italian level, personnel from the Italian Agency for Development Cooperation (AICS) were interviewed regarding AICS guidelines on the migration-development nexus. Finally, staff and representatives from the Italian Parliament were interviewed to gather insights into the challenges related to the transparency and accountability of Italy's external migration expenditure. The opinions expressed, as well as any errors or omissions, are the sole responsibility of the authors. The content of the interviews has been edited by the authors and should not be attributed to the interviewees, whose participation does not imply endorsement of the report or its conclusions.

Beyond these interviews, conversations with experts and researchers have been crucial to discussing the academic literature and evidence on the migration-development nexus (see the Acknowledgement section). Moreover, the issues addressed in this report benefited from the discussion developed within the framework of the seminar *The Illusion of Root Causes: Impacts of Border Externalisation Policies at the Intersection of Development Cooperation, Funding, and Strategies for Reappropriation by Local Actors*, organised during the 7th Conference of Escapes – Laboratory for Critical Studies on Forced Migration, held in Milan in September 2025.

In terms of desk research, the documents analysed for this report include:

- » NDICI-GE Action Documents adopted between 2021 and 2025 under the migration target of the Instrument, in the regions of North Africa and Sub-Saharan Africa. A group of Action Documents was then selected for deeper examination (see Annex 3).
- » Project documents and data obtained through FOI requests carried out as part of the project The Big Wall, from ActionAid Italy.

The analysis of these documents was conducted using the corpus of academic and policy documents produced on these matters, as well as information gathered through interviews and FOI requests.

Annex 3: Overview of European programmes analysed

A total of 33 Action Documents were reviewed for this analysis, 24 from North Africa and 9 from Sub-Saharan Africa. Nine of them, listed in the table below, were analysed in more depth and were selected based on these criteria:

- Actions adopted in 2024 or 2025, and therefore subject to the OECD guidelines on ODA eligibility of migration actions
- Actions representing the main categories of funding in each region
- For Sub-Saharan Africa in particular, which is the region with more actions globally, when more actions were adopted in 2024 for the same category, the actions with the highest budgets and a sub-regional focus on West Africa and the Sahel were selected
- The Action Document from the Flexible Mechanism has also been analysed for the section on conditionality

TABLE 19. List of actions reviewed for this report

Countries	Year adoption	Title of action	thematic area	Total budget	Marker	Dac codes
Southern Neighbourhood	2025	Support to strengthening migration governance and management.	Migration and Border management, fight against migrant smuggling and trafficking	140,000,000	2	15190 – 20% 15210 – 80%
Egypt, Libya, Morocco, Tunisia	2024	Supporting Protection and Strengthening the Resilience of Migrants, Refugees and Other People in Need of Protection in North Africa	Protection	53,000,000	2	15190 – 100%
Egypt, Libya, Morocco, Tunisia, Algeria	2024	Support to strengthening migration governance and management.	Migration and Border management, fight against migrant smuggling and trafficking	86,000,000	2	15190 – 25% 15210 – 75%
Algeria, Libya and Morocco	2024	Supporting Migrant Protection, Assisted Voluntary Return and Reintegration for vulnerable and stranded migrants in North Africa	Return and Reintegration	56,000,000	2	15190 - 100%

Countries	Year adoption	Title of action	thematic area	Total budget	Marker	Dac codes
West Africa	2024	Managing migration better in Western Africa	Migration and Border management, fight against migrant smuggling and trafficking	100,000,000	2	15190 – 100%
West Africa	2024	Unleashing the potential of youth in West Africa	Addressing root causes of irregular migration, through job creation and stabilisation	101,660,000	1	32130 - 25% 25030 - 10% 11330 - 25% 31120 - 15% 24050 - 25%
Sub-Saharan African countries of origin, transit and destination in the Atlantic/ Western & Central Mediterranean routes	2024	Migrant Protection, Return and Reintegration Programme for Sub-Saharan Africa (MPRR) Phase 2 (top-up)	Return and Reintegration	80,000,000	2	15190 – 100%
Benin, Burundi, Central African Republic, Chad, Côte d'Ivoire, Democratic Republic of Congo, Ghana, Nigeria, Rwanda, Tanzania, Togo, Uganda	2024	Protection, Assistance and Durable Solutions for Populations Displaced by Conflict in Sub-Saharan Africa	Forced Displacement	90,000,000	2	15190 – 100%
Sub-Saharan Africa	2022 2023 2024	Flexible Mechanism (FM) for Migration and Forced Displacement	//	420,000,000	2	15190 – 100%

Annex 4: Overview of Italian programmes analysed

TABLE 20. Migration Fund (Million €)

Countries	Year adoption	Title of action	Thematic area	Total budget	Implemented by
North Africa	2024	Multi-Sectoral Support For Vulnerable Migrants in Libya	Root Causes, Governance, Return and Reintegration	7,000,000	IOM
North Africa	2024	Provision of basic needs and essential services to forcibly displaced people	Protection	4,500,000	UNHCR
Eastern Europe	2022	Protection Activities for Refugees from Ukraine in Moldova	Protection	10,000,000	UNHCR
Eastern Europe	2022	Supporting the children of Ukraine: Emergency response in Moldova	Protection	5,000,000	UNICEF
Eastern Europe	2022	Strengthening capacities for the protection of Ukrainian refugees, third-country nationals and host communities in Moldova	Border management, Protection	5,000,000	UNHCR
North Africa	2023	Supporting a Human Rights-Based Response to Cross-Border Movements to Libya (Focus on the Tunisia/Libya border situation)	Protection	1,000,000	IOM

TABLE 21. Incentive Fund (Million €)

Countries	Year adoption	Title of action	Thematic area	Total budget	Implemented by
North Africa	2020	Support to Tunisia's border control and management of migration flows	Border management	27,000,000	UNOPS
Sub-Saharan Africa	2024	Support to Côte d'Ivoire's border control and management of migration flows	Border management	1,500,000	UNOPS
North Africa	2022	Enhancing Response Mechanisms and Assistance of Vulnerable Migrants in Tunisia	Protection, Return and Reintegration	3,150,000	IOM

TABLE 22. **Relint 2024**²⁵⁸

Submitting organisation	Title of the project (Italian)	Country of intervention	Approved amount (contribution DLCI)
Amref Health Africa Italia	EQUALE - EQUo Accesso alle opportunità socialI ed Economiche per i migranti e i gruppi vulnerabili in Etiopia	Ethiopia	€ 1,497,127
ARCS	Wok au Mboa (Lavorare qui): Formazione tecnica e scientifica per l'impiego dignitoso in Camerun	Cameroon	€ 1,500,000
Fondazione AVSI	Bara + - Emploi, Dignité et Espérance en faveur des jeunes pour la lutte contre la migration irrégulière en Côte d'Ivoire	Ivory Coast	€ 1,498,000
CEFA	WORK2gether: Working together for sustainable employment and agricultural development in Ethiopia	Ethiopia	€ 1,458,000
CESVI	Borena A.S.P.I.R.E.S.: Agricoltura Sostenibile, Pastorizia e Inclusione per la Resilienza Economica e la Stabilizzazione in Borena	Ethiopia	€ 1,500,000
CIES	INNOVATECH: Formazione, innovazione, lavoro e imprenditoria sostenibile come alternativa alla migrazione irregolare in Tunisia	Tunisia	€ 1,497,011
Condivisione fra i Popoli	EYEFON 2 - Contrasto alla migrazione irregolare attraverso formazione e qualificazione professionale della gioventù nigeriana	Nigeria	€ 1,490,001
CISP	PROTECT - Promuovere la Registrazione e l'Organizzazione per la Tutela e l'Empowerment di minori e giovani in Etiopia	Ethiopia	€ 1,500,000
COPE	Autre Couture, Haute Culture (Altra Moda, Alta Cultura)	Tunisia	€ 1,499,971
COSPE	CREARE - Competenze e Risorse per l'Educazione tecnica e l'Avviamento al Lavoro di Rifugiati ed Egiziani	Egypt	€ 1,500,000
CRIC	Territori in prospettiva: autosufficienza alimentare, protezione ambientale e opportunità di lavoro per donne e giovani in ambito rurale in Burkina Faso	Burkina Faso	€ 964,122

²⁵⁸ The qualitative analysis covered 26 of the 28 projects approved for funding. The projects submitted by C.I.F.A. – Centro Internazionale per l'Infanzia e la Famiglia ETS and CISP – Comunità Impegno Servizio Volontariato ETS were not included, as the relevant project documentation was not available in the document corpus used for the analysis.

Submitting organisation	Title of the project (Italian)	Country of intervention	Approved amount (contribution DLCI)
CVCS	FORM-INC - Formazione professionale e inclusione lavorativa nelle Regioni di Gbêkê e Haut-Sassandra	Ivory Coast	€ 1,499,953
Associazione Don Bosco 2000	Cooperazione Circolare (CC)	Mali	€ 1,139,328
Associazione Centro ELIS	Green Horizons: Formazione, Lavoro e Imprenditorialità Sostenibile in Costa d'Avorio	Ivory Coast	€ 1,500,000
ENGIM ETS	RESTART - Ripartire dal lavoro dignitoso per tutti per una società dinamica, inclusiva e solidale in Mali	Mali	€ 1,499,877
Fondazione L'Albero della Vita ETS	PRO-PRO: Formazione Professionale e Protezione in Niger	Niger	€ 1,492,894
Helpcode Italy ETS	InTRA: Innovazione e Tradizione per la creazione di percorsi di formazione professionale, impiego ed inclusione sociale dei giovani tunisini vulnerabili e marginalizzati	Tunisia	€ 1,343,014
Incontro fra i Popoli ETS	Orizzonte benessere nel Sahel - Crescita della soggettività e delle capacità di prevenzione e di risposta agli shock e alle crisi delle popolazioni più vulnerabili all'Estremo Nord Camerun	Cameroon	€ 1,000,000
Mani Tese ETS	LAGRO - Lavorare nell'agro-alimentare: sviluppo socio-economico e opportunità di formazione professionale e lavoro dignitoso nel settore agro-alimentare in Burkina Faso	Burkina Faso	€ 1,499,947
Movimento Sviluppo e Pace ETS	Rafforzamento delle capacità degli attori locali e della società civile per l'accoglienza degli sfollati interni, dei richiedenti asilo e dei rifugiati in Camerun	Cameroon	€ 1,080,000
Associazione Internazionale Volontari Laici – LVIA ETS	Intervento di sviluppo rurale multisettoriale e integrato nella Regione Oromia per contrastare la migrazione irregolare in Etiopia	Ethiopia	€ 1,500,000
Istituto Oikos ETS	RAISE - Conservazione delle Risorse idriche e della biodiversità tramite modelli di Agricoltura Innovativa e tecniche Sostenibili Ecocompatibili per il trattamento delle acque reflue	Tunisia	€ 1,025,949

Submitting organisation	Title of the project (Italian)	Country of intervention	Approved amount (contribution DLCI)
Plan ItalyETS	Avenir Brillant - Fase II. Creazione di opportunità socioeconomiche e rafforzamento dei meccanismi di protezione dell'infanzia, per migranti potenziali, in transito e di ritorno in Mali	Mali	€ 1,500,000
Progettomondo ETS	Sulle rotte dello sviluppo - Rafforzamento durevole della sicurezza alimentare, dell'agricoltura e della nutrizione a favore di comunità fragili, sfollati interni e famiglie ospitanti di Niamey e Zinder	Niger	€ 1,451,903
Comunità di Sant'Egidio ACAP-APS	DIRE - Diritto al nome, registrazione allo stato civile e resilienza in Burkina Faso	Burkina Faso	€ 1,361,195
Tamat ETS	SENE NI SORO - Agricoltura e agroalimentare a sostegno dell'imprenditoria e dello sviluppo locale del Mali	Mali	€ 1,500,000
Total			€ 36.298.296

Annex 5: Methodology developed for the analysis of project proposals approved under the RELINT 2024 call for proposals

Materials and units of analysis

The analysis covers the project proposals approved under the RELINT 2024 call and the related attachments. The unit of analysis is the individual project. Where information cannot be derived from the documentation, it is indicated as such and is not supplemented through inference.

How the analysis was conducted

For each proposal, two distinct operations were carried out. First, the project structure was reconstructed descriptively, covering context and territory, target groups, objectives, outcomes,

activities, indicators, partnership and, where available, resources. Second, these elements were assessed using a common framework, applied consistently to all proposals.

The assessment does not address the project's overall technical quality or its actual effectiveness, which cannot be established from the proposals alone. Rather, the analysis examines how the project constructs the relationship between development and migration: the extent to which migration is central to the intervention design, how *root causes* are defined, what theory of change is put forward, and what understanding of mobility emerges from the objectives, activities and indicators.

Assessment framework

The framework distinguishes between four dimensions, each addressing a different question and kept analytically separate.

Dimension	Scale	Question
Centrality of migration	M0 / M1 / M2	To what extent is migration formally central to the project's objectives, outcomes, indicators and overall structure?
Approach to root causes	RC0 / RC1 / RC2	To what extent is the proposed link between development problems, migration dynamics and expected outcomes structured and contextualised?
Approach to migration-development	MD0 / MD1 / MD2	To what extent are mobility and migrants also considered as resources and agents of development processes?
Migration mainstreaming	Absent / Partial / Systematic	To what extent is the migration dimension integrated across the analysis, target groups, activities and indicators?

Classification criteria

Centrality of migration

M0 indicates that migration is absent or secondary; M1 that it constitutes an explicit and relevant objective, but not the main rationale for the intervention; M2 that it represents the primary objective and that the project would not have been formulated in the same way without this purpose. The classification is assigned separately to the main intervention and to the project as a whole, with the latter also including the mandatory information campaign.

Approach to root causes

RC0 indicates an absent or purely nominal link between development activities and migration dynamics; RC1 a link that is present but simplified, linear or poorly contextualised; RC2 a more structured theory of change, in which problems, groups, territory, activities, outcomes and indicators are coherently connected, and assumptions, limitations or possible non-linear effects are acknowledged. The index does not measure whether the project will actually reduce departures, but rather the robustness of the theory proposed.

Approach to migration-development

MD0 indicates that mobility is represented predominantly as a problem or risk to be reduced; MD1 the presence of some positive elements – for example, regular migration, the skills of returning migrants, the role of the diaspora, or educational mobility – but in a secondary position; MD2 a structured logic in which mobility, migrants and diasporas contribute to development processes and the project concretely expands people's opportunities to choose, including safe, regular or circular forms of mobility.

Migration mainstreaming

Migration mainstreaming is assessed according to the extent to which the project concretely incorporates the relationship between migration and the intervention sector. This involves examining whether the analysis considers how mobility affects the context, needs, and opportunities of target groups, and, conversely, how the planned activities may affect migration dynamics, producing benefits, risks, or unintended effects.

Mainstreaming is considered absent when migration is merely mentioned or migrants appear simply as an additional category of beneficiaries; partial when this relationship affects only some elements of the project; and systematic when it coherently informs the analysis, target groups, activities, participation, indicators and assessment of the possible effects of the intervention.

Identifying the predominant logic

After assigning the classifications, an overall assessment of the predominant logic was formulated for each project. The assessment does not result from a mechanical sum of scores, but from an integrated reading of the proposal, taking into account the central problem, the specific objective, the outcomes around which activities are concentrated, the indicators, the role attributed to development interventions, the role of mobility and, where available, the allocation of resources.

The categories used are: *predominance of the root-causes approach*; *predominance of the migration-development approach*; *predominance of a development-based containment logic*; *predominance of sectoral development with a migration component*; *hybrid intervention*. Where relevant, a secondary logic is also identified. The mere presence of a migration-related indicator or migrants among the beneficiaries is not, on its own, sufficient to determine the predominant logic.

Information campaigns and other migration-related areas

The mandatory information campaign was analysed separately, with its objectives, target groups, messages, tools, and indicators. The analysis considers, among other aspects, whether the campaign assumes an information deficit, relies on fear-based or deterrent messages, provides concrete alternatives, and carries a risk of stigmatisation. No judgement is made regarding the campaign's actual effectiveness.

Where present, components relating to return, reintegration, protection, refugees and people affected by forced displacement, trafficking in persons, migrant smuggling, child protection, diaspora, regular migration and migration governance are also recorded, distinguishing the function they perform within the project.

Rules applied to the assessment

- » The same framework and scales are used for all proposals.
- » A distinction is maintained between what is explicitly stated in the documents and the analytical interpretation.
- » No inferences are made that are not supported by the documentation.
- » Cases where information cannot be ascertained are explicitly identified.
- » A distinction is maintained between the formal

centrality of migration and the substantive strength of the intervention theory.

- » No judgement is made regarding the actual effectiveness of projects in the absence of implementation and outcome data.

Use of ChatGPT (OpenAI) and human review

ChatGPT (OpenAI) was used to support the systematisation of the document analysis: to organise the information extracted from the proposals according to the common framework, check consistency in the application of the categories, and support the drafting of summaries. Classifications were not assigned automatically; each assessment was reviewed and validated by the author based on the project documentation. The model was not used to fill in missing information or to attribute content to projects that was not present in the documents.

Transparency note

ActionAid Italy participated, with Plan International Italy as the lead applicant, in the RELINT 2019 and RELINT 2024 calls through the Avenir Brillant project in Mali and the subsequent Avenir Brillant – Phase II. This participation is disclosed for transparency, as the report critically analyses the approach and projects funded under the RELINT calls.



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