

Outsourcing borders

Monitoring EU externalisation policy

Bulletin 11
5 November 2025

“History has failed us, but no matter.”

Min Jin Lee, Pachinko

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Thematic and regional developments

Official EU documents summarised here, and those published with previous editions of the bulletin, are contained in our [document archive](#).

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Border management

Commission presents draft declaration for global counter-smuggling alliance

In a letter to delegations on 18 July 2025, the Danish Presidency presented the Commission's draft Joint Declaration on the [Global Alliance to Counter Migrant Smuggling](#), to be unveiled at the alliance's second conference in Brussels on 10 December 2025.

The [draft declaration](#) (pdf) puts a heavy emphasis on smuggling as a **transnational crime**, as well as the EU's intention to marshal various agencies and international conventions to counter it.

Notably, the document emphasises a “**whole of route**” approach. [A key part of the EU's overall external migration control strategy](#), “whole of route” approaches, also known as “route-based” approaches, extend the EU's policing powers into third countries to prevent peoples' mobility at the periphery, long before they set a definite course for Europe.

The document also mentions the importance of data collection and sharing among the alliance, as well as information campaigns in countries of origin or transit intended to dissuade people from moving. It also discusses **engaging with tech companies to remove content about smuggling** from social media, and alludes to the EU's efforts [to put more pressure on commercial transport operators](#) to engage in counter-irregular migration activities.

Commission outlines plan to use visas as leverage for deportation cooperation

With a new EU Visa Strategy due to be adopted by the end of 2025, a paper from the Commission to the Visa Working Party on 30 September 2025 presents various suggestions for **how the new visa regime could be used to achieve the EU's deportation aims**.

Regarding the levers the EU can pull in “securing borders, managing migration, and promoting better cooperation with non-EU countries,” [the paper](#) (pdf) notes visa policy as particularly potent:

The EU's visa policy has emerged as a key instrument, not only facilitating the free movement of people, but also yielding significant geopolitical influence. With 9.7 million Schengen visas issued in 2024 and over 1.4 billion people from 61 countries benefiting from visa-exempt travel, the EU's visa policy plays a crucial role in promoting tourism, trade, and economic growth. Nevertheless, there is potential to use the EU visa policy even more strategically.

The document presents two main strategic goals: boosting the EU's economic growth and competitiveness (which is not of interest for this bulletin), and **a visa policy that reinforces EU security**.

Proposed actions to this end include (among others):

- **A new visa exemption/suspension system**, with more flexible assessment criteria, more regular assessment of visa-free regimes, wider grounds for suspensions and faster processes for granting or withdrawing visa exemptions.
- **More flexible Article 25a procedures**, allowing for the mechanism to be invoked to cover a wider range of visas (rather than limited to short-stay tourist visas) and visa processes.
- **Expanding the toolkit** to include ad hoc responses and allow visa measures to be used in response to a lack of cooperation in wider areas such as security.
- **Further targeted measures** to restrict the movement of people from countries with “severely deteriorated relations” with the EU.
- **Frontex training and support** to member states to guide implementation of the visa policy.

Overall, the document makes it clear **the EU intends to use visa policy as one of its main tools in securing cooperation on deportations**, and appears to be considering its use in other areas of cooperation and diplomacy as well.



UK seeks greater migration control through Balkans states

The UK-hosted [Berlin Process summit](#) in mid-October aimed at increasing the border control abilities of Balkan states.

Running parallel to the EU’s [ambitions for tightening borders in the Balkans](#), the summit was hosted by the UK. The stated aim was to “help deliver on the UK government’s strategy to strengthen borders, smash the gangs, and get those with no right to be here returned to their countries.” It comes at the same time as the UK claims to be developing a “world-first” sanctions regime against smugglers.

The UK has in recent years courted Balkans nations, looking for its own version of the EU’s “return hub” schemes (though the UK prime minister, Keir Starmer, previously criticised the Rwanda scheme of his Conservative predecessors). Starmer [has praised Italy’s Albania scheme](#), and is rumoured to have attempted to secure a similar deal. In late October, the prime minister of Kosovo said discussions were taking place for a return hub-type deal there.

Budgets and funding



Parliament's development committee explores further use of aid as external migration leverage

The meeting of the European Parliament's Committee on Development (DEVE) on 5 November will see the presentation of a report on **'Reinforcing development cooperation to address irregular population movements and their root causes in partner countries'**.

[The report](#), to be presented by rapporteur Lukas Mandl (EPP), reads as a laundry list of actions for pursuing the EU's external migration policy ambitions. Recommendations in the current draft include:

- systematic integration of “migratory considerations into development policies and programmes;
- “tailor-made” external migration approaches to individual countries;
- integrating “migration-related conditionality” into development funding, thereby **“ensuring that funding allocations take into account partner countries’ cooperation on return and readmission”**;
- more attention given to the advantages of deploying private investment in third countries;
- “greater financial and political commitment” to externalisation projects along migratory routes;
- combatting ‘brain drain’ in developing countries by exploring ways to **“return and reintegrate” skilled migrants**; and
- further media and outreach campaigns in countries of origin and transit to dissuade people moving.

Deportation and readmission



EU member states to get more freedom in latest deportations proposal

As negotiations over the EU's deportation regulation continue, the Danish presidency has presented its second compromise proposal.

While the first compromise text, [analysed in the previous Outsourcing Borders bulletin](#), saw considerable changes stripping away human rights safeguards and anything else standing in the way of deportations - this update appears more procedural, 'tuning up' the language, particularly around deportation orders.

That said, [this version of the text \(pdf\)](#) continues the trend of watering down safeguards and human rights obligations, and **giving states more latitude to detain and deport people at their pleasure**.

A key change is the following addition, in the section on [so-called "return hubs"](#):

***Deficiencies** in relation to specific parts of the territory of the third country or to identifiable category of persons **should not prevent the conclusions of such an agreement or arrangement**, provided that sufficient guarantees are in place to ensure the full respect of the rights of the third country nationals which are concerned by such agreement or arrangement.*

This clause **lowers the human rights standards by which partner third countries are judged**. A "return hub" may be established in such a country, even if human rights "deficiencies" persist, so long as those deficiencies don't in theory affect the people being deported there.

The document also goes further in delineating the compliance standards expected of partner third countries depending on whether they are expected to be a final destination for deportees, or merely a stop before onward travel. The text **allows for the possibility of detention in third countries**.

Finally, member states have been afforded **even more latitude to detain, search and otherwise deprive people of their liberties** in the name of effecting returns. The new proposal – apparently at the behest of member states – gives more room for states to ground those procedures in national law.

Other notable changes in the second revised text include:

- entry bans after deportation could last twenty years, rather than ten;
- while unaccompanied minors would be protected from "return hubs", families with children would not;
- **public health concerns have been added as grounds to detain someone and/or derogate from other protections in the regulation;**

- the proposal enshrines language **giving member states the option to choose between a range of countries to deport someone to** (for instance, countries of origin or transit or one with which the EU or member state has a return arrangement);
- in cases of an age dispute of a possible minor, states are expected to rely on “age assessments completed under previous procedures”;
- member states are given wider latitude to **extend detention beyond 24 months**;
- obligations to detain people in a “humane and dignified manner” have been further diluted;
- states may **issue an entry ban against someone even if they leave the territory before a deportation order is issued**;
- language around what makes someone a security risk has been loosened, from ‘clear’ indications of risk to ‘reasonable’ indications;
- language around member state obligations to ensure non-refoulement has been loosened; and
- member states **may communicate with “non-recognised third country entities” (i.e. the Taliban) for the purposes of deportations**. This does not, however, amount to “diplomatic recognition”. This clause, while in the original Commission proposal, had been removed from the first compromise text.

Notably, this compromise text does not include updates on the mutual recognition of deportation orders, one of the thorniest issues (see below).



Member states push for wiggle room on mutual recognition of deportation orders

A [paper](#) (pdf) circulated by the Danish presidency on 3 October re-emphasises its desire for more mutual recognition of deportation orders among member states.

A key part of the overall deportation plan, mutual recognition is the subject of much discussion. It **appears to be one of the most contentious aspects of the overall process, with the most recent draft of the deportation regulation describing the relevant sections as “not ready”**.

The key issue at stake appears to be the **mandatory mutual recognition** proposed by the Commission:

*The Commission’s intention is that **mandatory mutual recognition will send a clear message** not only to all illegally staying third country nationals, but also to our citizens, that once a return decision is issued in one of the Member States, it will be implemented across the entire Schengen area.*

However, some member states have argued that enforced recognition of other member states’ deportation orders may not always be the most efficient strategy and may in fact be more burdensome than just doing it themselves.

The Presidency has listened to member state concerns, and proposed relevant exceptions. It also proposed extending the period before recognition becomes mandatory for another three years.

This matter appears to have been discussed further at the [Justice and Home Affairs Council meeting 13 October 2025](#).

Migration partnerships



Danish presidency hails €12.5 billion EU-Turkey partnership as ‘successful’, looks to reconfigure

A [letter](#) (pdf) from the Presidency to the Working Party on the External Aspects of Asylum and Migration (EMWP) outlines the history and structure of migration cooperation with Turkey, and looks to the future. According to the report, despite troubling developments in the country, **Turkey remains a ‘key partner’ on migration.**

Overall, the tone is positive, with the report **describing Turkey-EU migration cooperation (which has cost the EU €12.5bn since 2011) as a “success”**, despite concerns raised by human rights and humanitarian organisations. This success appears to be judged by the amount of people detained in Turkey or otherwise prevented from reaching Europe.

Looking to the future of the cooperation, the Presidency notes **in particular a desire to finally re-start deportations to Turkey.**

The document reports a meeting between EU Commissioner for Internal Affairs and Migration, Magnus Brunner, and the Turkish interior minister, Ali Yerlikaya, in Istanbul on 2 July. The meeting is described as “constructive”, with a **mutual interest noted in returns to Syria** (Between 8 December 2024 and 14 August 2025, according to the report, 411 649 Syrians had voluntarily returned to Syria).

Turkey has enhanced its cooperation with both Frontex and Europol in recent years, and **discussions are underway for a new working arrangement with Frontex**. There also appears to be appetite to update the working arrangement with Europol, in order **to facilitate the sharing of personal data**. The current inability to do so is described as a “limiting factor”.

Concluding, the report invites EMWP delegations to give their own opinions on migration cooperation with Turkey, and invites them to update the group on member states’ bilateral programmes.

Delegates are also invited to comment on their main priorities for Turkey cooperation, in light of the changes in Syria, and give their thoughts on whether the “one-for-one” model of the EU-Turkey statement is a good model to pursue with other countries outside of Europe. The “one-for-one” model has been [duplicated by the UK and France](#) in their agreement on migration across the Channel.

Council touts its human rights approach while ignoring human rights abuses

The Presidency has updated the EMWP on its efforts to implement so-called ‘Human Rights-Based Approaches (HRBA)’¹ in migration partnerships:

“Upholding human rights play [sic] a key role in ensuring the legitimacy of the EU’s partnerships with third countries, and thus the EU and Member States are under constant scrutiny when it comes to upholding human rights in its migration cooperation.”

The [document](#) (pdf) notes various issues raised about the human rights impacts of the EU’s externalisation projects, including by the European Court of Auditors in a [September 2024 report](#).

These include **a lack of human rights impact assessments, poor monitoring and compliance, insufficient reporting mechanisms and a lack of practical guidance for dealing with reports of human rights violations**. Many of these criticisms were directed at projects under the EU Trust Fund for Africa.

The Council appears surprised to learn of the EU’s human rights shortcomings:

*“...the Council noted with concern the findings of the ECA that, **despite an innovative approach to identifying human rights risks in a difficult environment, the assessment of potential risks to human rights was not comprehensive, and that no formal procedure was in place to follow up systematically on allegations of human rights violations in the context of EUTF projects.**”*

The document goes on to describe various HRBA-informed strategies in response. These include improved monitoring and reporting, as well as follow-up and internal procedures on allegations of human rights violations.

The Council also claims a new procedure to “swiftly” suspend or terminate funding if allegations of abuse are substantiated, “to ensure that EU-funded projects are not perpetuating harm to the rights of migrants.”

There is also reference to the creation of a detailed guidance document, **“The Human Rights-Based Approach in Migration and Forced Displacement”**. This is not currently publicly available. The document also refers to “contractual templates” for project grants in partner countries, with stronger human rights safeguards on paper.

The document’s tone reflects the way the EU uses a fog of human rights language to obscure the harms caused by externalisation. Amid discussion of the many “human-rights-

¹ ‘HRBA’ is an established methodology [adapted by the Commission](#) that purports to put human rights at the forefront of its actions, along various principles including: meaningful participation and inclusion; non-discrimination and equality; accountability and the rule of law; and transparency.

based” strategies to prevent abuses in places such as Tunisia and Libya, there is a studied ignorance of what those abuses actually entail.

For example, the report quotes a [2023 UN report](#) that found EU support had been used “**in the context of the interception and detention of migrants**”. For some reason the Danish Presidency chose not to reference the following paragraphs in the UN report, which describe **systematic torture** at the hands of the EU’s migration partners.

It is also notable that, while the Council touts new procedures to suspend funding in cases of human rights abuses, the report does not give any suggestion such a procedure is being considered in the case of Libya. Rather, the Council strategy focusses on increasing “voluntary” returns from Libya.

Guiding questions for the EMWP at the end of the document suggest the Human Rights-Based Approach in migration partnerships may continue to be a topic of discussion in future meetings.



EU cooperation deal with Uzbekistan includes migration plans

In late October 2025 the EU signed an [Enhanced Partnership and Cooperation Agreement](#) with Uzbekistan. Articles 14 and 15 [of the agreement](#) set out plans for cooperation on immigration, asylum and border control, as well as the readmission of deported people. One of the general principles of the agreement is: “Respect for democratic principles and human rights and fundamental freedoms”.

Human Rights Watch noted [in its 2024 world report](#) that Uzbek authorities “increasingly targeted independent activists with unfounded criminal charges and blocked independent monitors’ access to the country.”

Other



EU digital visa system registers more than 300,000 visitors in four days

The EU's digital [Entry/Exit System](#) for non-EU visitors came online on 12 October 2025, registering more than 300,000 border crossings by 16 October. Described as one of the “world's most modern border management systems” by Europol, the system collects passport, biometric and historical travel data, ostensibly to streamline border crossings but with a **strong migration enforcement component**. The system is [part of a wider EU ecosystem](#) of interoperable surveillance and control programmes.



Commission launches its Pact for the Mediterranean strategy

On 16 October 2025, the Commission announced its [Pact for the Mediterranean](#). Migration management is a key aspect: “**A whole-of-route approach to migration management** will be promoted as well as a common approach to integrated border management and security, which will include **operational partnerships to counter migrant smuggling**”.

Dubravka Šuica, the Commissioner for the Mediterranean, is [one of four Commissioners \(out of a total of 26\) with responsibility for migration policies](#).

The Pact is expected to be discussed at a meeting of the parliament's Committee on Foreign Affairs, and (it is hoped) endorsed by EU and southern Mediterranean partners, in November 2025. While there is little detail as yet, the Commission is expected to produce an **Action File on the Pact for the Mediterranean in early 2026**.

Implementation of the Pact will be monitored by a group of senior officials from the EU and “southern Mediterranean partners,” which will meet twice a year.



Parliament to discuss upcoming Migration Pact report and solidarity pool

At the European Parliament plenary on [12 November 2025](#), MEPs will be presented with an update on the Commission's first “Annual Asylum and Migration report”. The report forms part of the governance of the new Pact on Migration and Asylum. MEPs will also hear statements on [the Annual Solidarity pool](#).



Rabat, Khartoum and Niamey Processes to join forces in Lagos

On 4 and 5 November 2025, partner countries of the Rabat, Khartoum and Niamey Processes will meet for a [first Joint Thematic Meeting](#). The meeting, co-chaired by Nigeria and France and hosted in Lagos, appears to have a strong focus on ‘whole-of-route’ approaches to migration control. The meeting will “**serve as a stepping stone toward greater operational, institutional and policy coordination between countries of origin,**

transit, and destination". The meeting is expected to produce recommendations for concrete actions, in order to "remain responsive to the evolving dynamics along African and European migratory routes."

Updates to the document archive

The [Outsourcing Borders document archive](#) hosts key documents from the Council of the EU and the European Commission.



External Aspects of Asylum and Migration Working Party (EMWP)

[Status on the EU cooperation with Turkey in the area of migration](#) – Presidency note to EMWP meeting on 10 September 2025 (11680/25, LIMITE, 3 September 2025, pdf)

[Human rights-based approach to migration cooperation](#) - Presidency note to EMWP meeting on 10 September 2025 (11681/25, LIMITE, 3 September 2025, pdf)

Other documents

Proposal for a Regulation of the European Parliament and of the Council establishing a common system for the return of third-country nationals staying illegally in the Union - [Second Presidency compromise proposal](#) (14296/25, LIMITE, 24 October 2025, pdf)

[Joint Declaration on the Global Alliance to Counter Migrant Smuggling](#) – draft shared by the Danish Presidency with delegations (11767/25, LIMITE, 18 July 2025, pdf)

[Background note on EU Visa Policy Strategy](#) – note from the Commission to the Visa Working Party (13255/25, LIMITE, 30 September 2025, pdf)

[Mutual recognition of return decisions issued by other Member States](#) – Presidency paper circulated to Permanent Representatives Committee (9205/25, LIMITE, 3 October 2025, pdf)

[Analytical Supporting Document Accompanying the Proposal for \(the Return Regulation\)](#) (6917/25, 16 May 2025, pdf)

About this bulletin

This project, carried out by *Statewatch* and *migration-control.info* and funded by *Brot für die Welt*, *Misereor*, *medico international* and *Pro Asyl*, aims to make the EU's externalisation policies, plans and practices public. In doing so it seeks to highlight their impact on the rights of people on the move, as well as democratic standards, transparency and accountability. It addresses a lack of public information by publishing relevant EU documents, in this phase primarily those produced or discussed by the Council of the EU. It also tackles the overflow of information that results from a variety of EU institutions, working groups and national governments involved in the externalisation agenda by summarising thematic and regional developments, and by analysing key issues in depth.