



Response provided by the Danish Refugee Council to the Public Consultation by the Danish Ministry of Foreign Affairs on the planned 'Whole-of-Route Migration Programme', 2024-2029.

DRC is grateful for the opportunity to provide input to the draft programme document in this public consultation. We take note of the overall alignment between DRC's routes-based migration programming approaches, the evidence and analysis generated the Mixed Migration Centre, and the strategic priorities of the Danish MFA as outlined in the draft programme document.

DRC would like to put forward the following points for consideration:

1. Overall strategic framework for the Whole-of-Route programme:

- a. DRC welcomes the overall direction and comprehensiveness of the proposed programme and the aspiration to reduce the risks and vulnerabilities of people on the move. DRC commends the Danish MFA for its sustained and deepening focus of the interconnected nature of climate change, migration and conflict, which similarly underpins DRC's 2025 Strategy.
- b. DRC is pleased to see DRC's – as well as the Mixed Migration Centre's – extensive experiences from past interventions such as the 3M programme reflected in the draft programme document. We agree with the considerations underlying the Whole-of-Route (and Whole-of-Society) approaches and the need for comprehensive interventions alleviating needs along the multivarious axes highlighted in the document and working in close collaboration with local duty bearers, civil society and international actors.
- c. However, we are concerned about a possible misalignment between the budgetary, geographical and sectoral scope of the proposed programme, working across several partners, including significant downstream partner components, and across multiple countries and regions. We would encourage further clarity around the priority routes or number of countries to ensure a coherent quality outcome.
- d. Overall, DRC suggests that the strategic framework around this draft programme could be further strengthened by stating explicitly the envisioned interlinkages between the *Whole of Route Programme*, and the *Regional Migration Governance Programme* and *Danish Migration Management and Return, Readmission and Reintegration Programme*, and how they collectively align with the three tracks of the Whole-of-Route approach (Track 1: prevent irregular migration by promoting legal pathways to migration; Track 2: manage irregular migration; Track 3: promote return and readmission).
- e. A key assumption in the Whole-of-Route approach is that expanding access to legal pathways for migration and facilitating regularization will contribute to a reduction in irregular migration. DRC recommends further articulating how the overall Danish migration programme intends to contribute to improved access to regular migration opportunities and protection of migrants' rights along the routes, including in changes in laws and policies and their application, and further how this interlinks with the objectives of the present Whole-of-Route draft programme. DRC suggests that this might concretely be strengthened by a complementary advocacy component, which includes supporting CSOs in transit countries to advocate for migrant rights.
- f. DRC suggests clarifying the relationship between the objectives of the present Whole-of-Route programme and the migration and mobility pillar in the 2023 EU-Tunisia Memorandum of Understanding, to ensure that strengthening of the protective environment for people on the move is streamlined across Danish MFA engagements.

2. Programme Objective:

- a. The specific objective (SO) of the programme reads: *“...to contribute to prevent irregular migration and ensure that people on the move along the migration routes are less vulnerable through accessing higher quality services and information required to make better informed, and less risky decisions along migratory routes”* (p. 13). DRC suggests that the success for the programme would be more productively measured by its ability to contribute to reducing the need for irregular and onward movements, rather than the extent to which it reduces irregular movement itself. There is evidence that policy and programming approaches, whose stated objectives are to reduce and/or restrict movements, including the increasing criminalisation of irregular movements in national legal frameworks, may have counterproductive outcomes, especially when it is not balanced by an expansion of protection services and the enhancement of the protective environment. A focus on preventing and/or reducing irregular movements can incentivize more restrictive measures that push refugees, asylum seekers and migrants into invisibility and exacerbate protection risks. This in turn risks contradicting the objective to ensure safer and more orderly migration.
- b. DRC strongly recommends that the right of asylum seekers and refugees to seek safety is clearly articulated to ensure that the stated objective of preventing irregular departures is adequately framed.

3. Theory of Change and Results Framework:

- a. The Theory of Change has a significant focus on the lack of accurate information and services as primary risks faced by people in migration flows. DRC proposes that this is further contextualised by the influence of non-conducive laws, policies, political interests (including anti-migrant rhetoric), and the role of international criminal networks. These factors, which are mentioned briefly in the Context section, are important to include in the overall programmatic framework (both Theory of Change and Results Framework) to clarify that the provision of services alone will not necessarily automatically result in their utilization.
- b. DRC acknowledges the significant role that knowledge and evidence creation appear to play in the draft programme, including by informing evidence-based programming and contributing to better programme adaptation, and contributing to a better understanding of mixed migration dynamics by the general public (including transit and hosting communities) and authorities and policy makers (at local/national/international level). However, this does not seem to reflect clearly in the Theory of Change or the outcomes in the Results Framework themselves. We recommend explicitly articulating the expected function and impact of knowledge and evidence in the final outcomes.

4. Geographical scope:

- a. Under “Outcome 2 – Direct assistance / basic needs” (p. 17), the programme document refers to direct assistance to be provided in “transit locations in the four countries of implementation.” A restriction to four not further specified countries, however, does not seem to align with the whole-of-route approach.

5. Short summary of projects:

- a. Overall, DRC recommends ensuring that the draft programme contains provisions for engaging with “informal” or unconventional stakeholders, which could include, for example, diasporas and peer migrants. This is in alignment with the programme’s reference, for example to the Sahelian regions being extremely hard to access by conventional organisations.
- b. Outcome 2 is defined as “People on the move access protection systems and services as well as livelihood opportunities in a timely and rights-based manner where they are”. However, no livelihoods-related output is described under Outcome 2 in the draft programme document (pp. 17-18). In DRC’s experience, provision of livelihoods opportunities to people on the move is seldom feasible. To better understand how the MFA envisions the centrality and practicability of the provision of livelihoods opportunities, it would be useful to include examples in the description of outputs.

- c. DRC suggests that reference can be made to the positive experiences of applying Site Management Services to enhance the protective environment of certain displacement sites hosting mixed migrant populations, especially with the involvement of and support to national or local authorities and civil society. The Site Management Services approach has been used in displacement sites with mixed migration populations in Libya to alleviate dire conditions. This might constructively be referenced under Outcome 3 as a separate but interlinked output.