



RHA

Clandestine Entry in Road Transport and the UK response

A report on clandestine entry in road transport

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Introduction

Illegal immigration has become one of the most discussed and divisive political issues in both the United Kingdom and the United States. What is often lost in these debates is the human element – for those attempting to cross the border, those trafficked against their will and those unwittingly caught up in the organised criminal activity.

Protecting a nation's borders must be a partnership between those crossing the border and those policing the border. Strong security methods, effective use of new technology and collaboration and communication between travellers and border guards are vital.

This report investigates the status quo of the approaches to tackling clandestine trafficking by truck, reflected by the organisations representing the road transport sectors in Europe and the USA.

This report aims to understand what processes are used in the UK, EU countries and the USA as a deterrent against migrants arriving illegally by trucks and to compare legal, regulatory, enforcement, and operational measures taken by the selected countries.

Increasing political attention has been given to illegal migration, particularly over the last 10 years. 2016 saw promises of significant changes to deter illegal migrant entry in the United Kingdom, following the EU referendum result, and in the United States, with the first election of President Trump.

This report delivers a structured, comparative analysis of how the UK, Europe and the USA deal with the issue of illegal clandestine entrants in road transport vehicles.

The structure of the report is based upon direct interviews with representatives of the IRU (International Road Transport Union, Brussels & Geneva, reflecting the current and proposed EU Commission legislation and practice), Truckers Against Trafficking (TAT, a US based non-profit working with trucking industry and the American Trucking Association), plus national transport organisations throughout Europe.

The report objectives are to identify and compare legal, regulatory, enforcement and operational measures taken by the selected countries, to analyse the effectiveness of these measures and understand best practices, to highlight the various roles and responsibilities of public and private stakeholders in each country and to examine the risks posed to drivers and hauliers, and how these risks are managed or mitigated.

Background

The number of illegal border crossings into the European Union takes place along various routes. Trends and developments in this area are monitored by Frontex, the European Border and Coast Guard Agency. Frontex supports EU Member States and Schengen-associated countries in managing the EU's external borders and combating cross-border crime. Frontex distinguishes a total of seven different migration routes to the European Union (see graph 1). In 2024, there was a 38 per cent decrease in the total number of irregular border crossings compared to the previous year. This was the lowest level since 2021, when migration was still affected by the coronavirus pandemic. This sharp decline was mainly due to a decrease in migrants via the Central Mediterranean route and the Western Balkan route. In 2024, the Channel route from France to the United Kingdom showed a slight increase of 9 per cent, but the most recent figures from Frontex show a decrease of 28 per cent. In total, around 4,400 illegal migrants were apprehended on this route in the first two months of 2025.

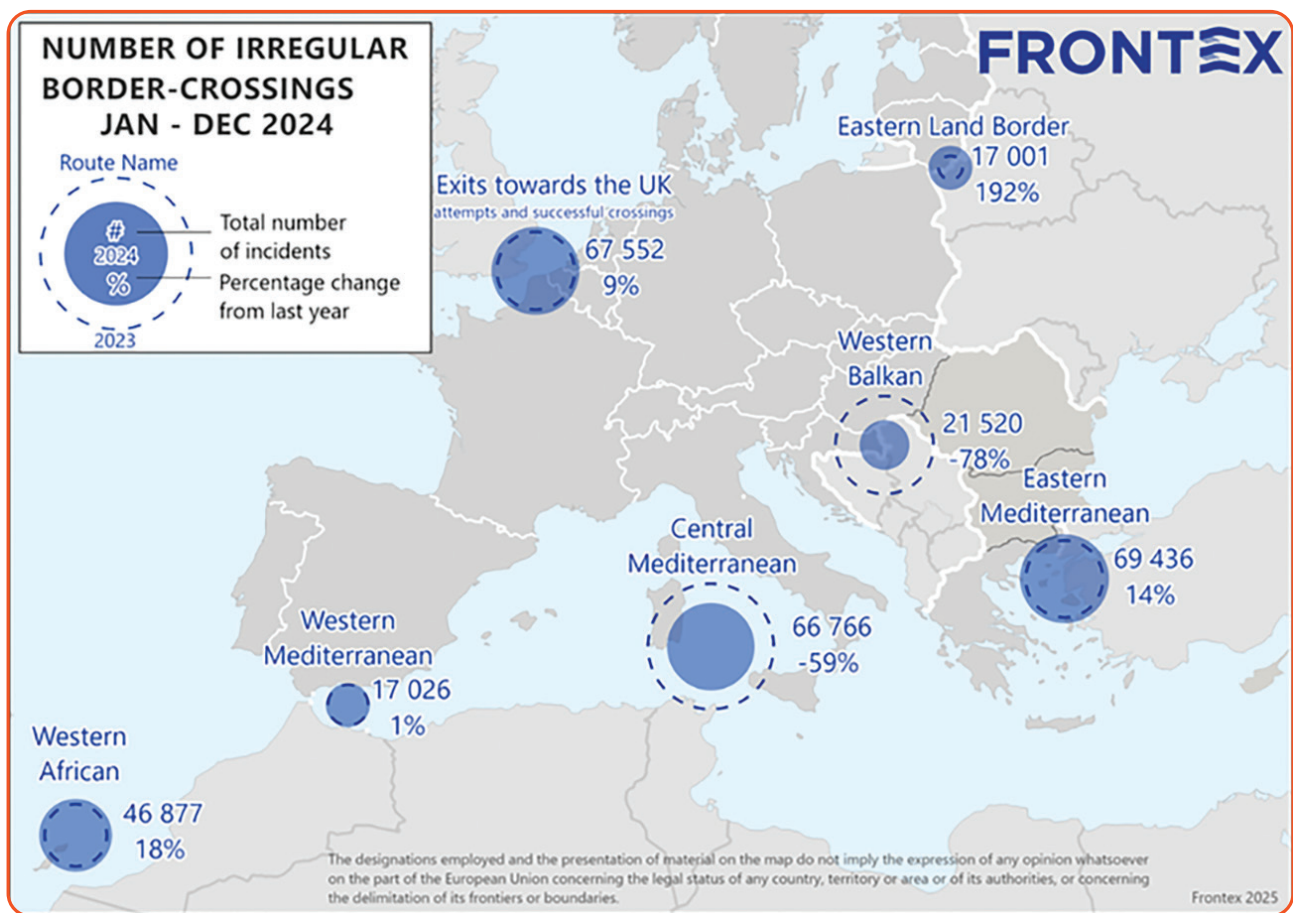


Fig. 1 – Number of irregular EU border crossings in 2024

Until 2018, migrants were mainly smuggled into the United Kingdom by freight transport and train via the Channel Tunnel. However, as a result of tighter surveillance and controls, increasing demand and other factors, the modus operandi changed to using small boats (rigid inflatable boats) to make the crossing from France. The smuggling networks involved have also changed over the years. Previously, smugglers and their 'customers' were usually of the same nationality. According to the Global Initiative against Transnational Organised Crime (GI-TOC), the smuggling route to the United Kingdom is now dominated by Kurdish groups². Albanian smugglers, who were long regarded by the British media as the main players in this field, now operate under the auspices of the Kurds. This does not mean that there is a single Mafia-like Kurdish group controlling the entire smuggling chain on the French coast, but rather that there are several Kurdish groups (from Iraq and Iran), each with their own territory.

The former system, in which migrants had to wait for months in camps before crossing, as in the Jungle in Calais in 2015 and 2016, no longer exists. Nowadays, migrants are housed further inland while they wait for the right moment to make the crossing. This moment depends on many factors, such as weather conditions, but also the availability of the necessary small boats. Although the distance from Calais to the United Kingdom is relatively short, the crossing is a very dangerous undertaking. On the one hand because of the weather conditions, and on the other because it is a busy shipping route.

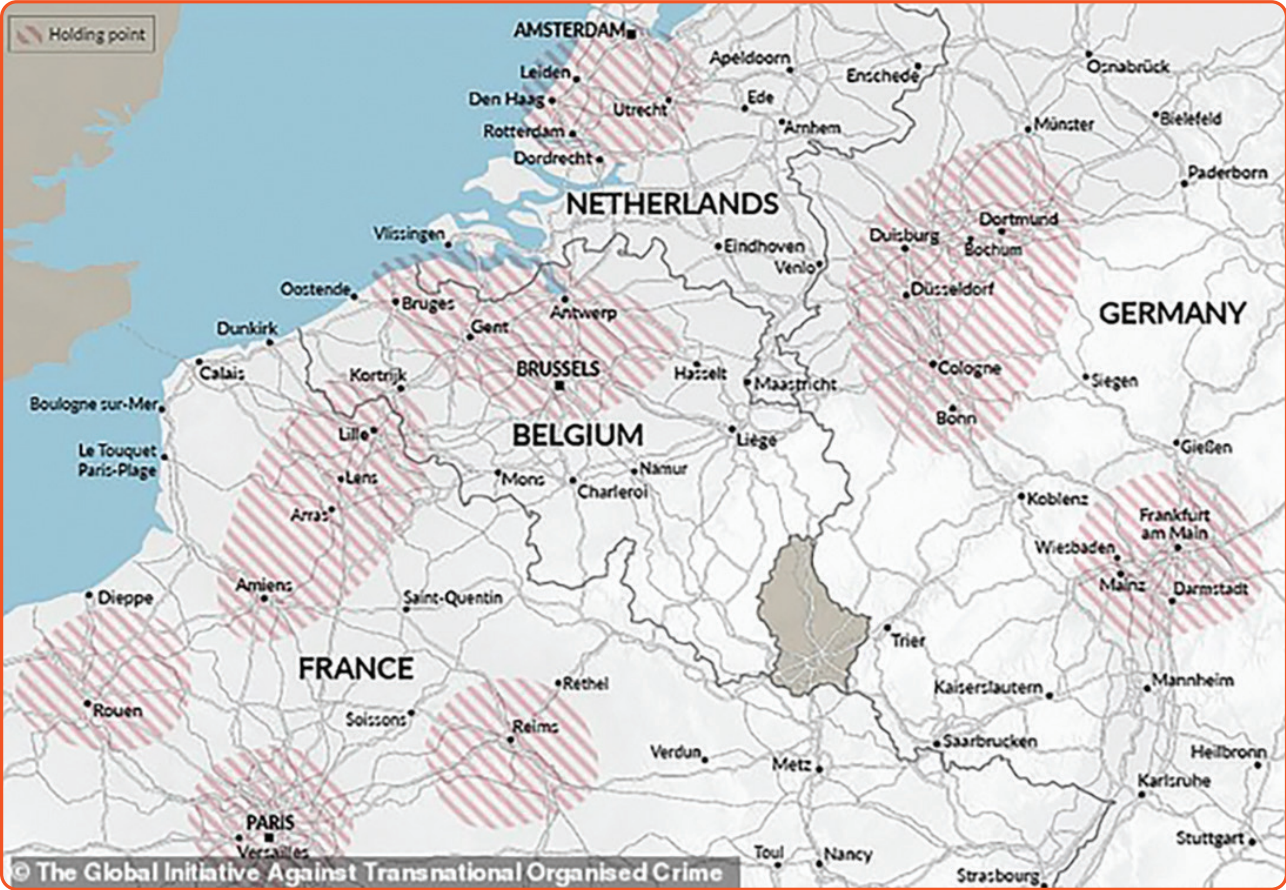


Fig. 3 – Areas of significant clandestine entrant activity

¹<https://www.frontex.europa.eu/media-centre/news/news-release/significant-rise-in-irregular-border-crossings-in-2023-highest-since-2016-C0gGpm>

²<https://www.frontex.europa.eu/media-centre/news/news-release/significant-rise-in-irregular-border-crossings-in-2023-highest-since-2016-C0gGpm>

³<https://globalinitiative.net/analysis/english-channel-migrant-people-smuggling-france-uk-kurdish-gangs-crime/>

Lorries at the UK Border and the Clandestine Entrant Civil Penalty Scheme

Clandestine Entrant Civil Penalty Scheme

The Clandestine Entrant Civil Penalty Scheme⁴ is a UK Government scheme designed to deter those from arriving in the United Kingdom illicitly hidden in motor vehicles. The Scheme places a responsibility upon domestic and commercial vehicle owners, hirers, drivers and operators to ensure vehicles and separated trailers are secure and inspected before entering the country in either direction. Failure to perform these inspections, or to secure vehicles and trailers, results in substantial civil penalties against responsible parties.

The two main offences are:

- Carrying a clandestine entrant - If you have one such clandestine entrant hidden in your vehicle, you will be fined up to £10,000 for each individual - and the same applies to each party involved, including the owner, hirer, or driver.
- Failing to secure a goods vehicle - Even if no one is found, you can still be fined (up to £6,000) if your vehicle isn't adequately secured against unauthorised access.

These are sanctions of a civil nature, i.e., these can still be imposed even in the case that the driver or operator did not know that someone had boarded the vehicle. The law requires those involved to be reasonable in precautions, i.e., to make proper checks, keep proper records, and use appropriate security devices.

Recent legislative changes include more severe maximum penalties and the abolition of most defences. The only defence currently accepted is that of duress, where the driver or owner of the vehicle is able to demonstrate that they were forced to carry someone. A working vehicle security system used to be an accepted defence, but not anymore.

Operators who can demonstrate that they consistently maintain strong vehicle security can benefit from the Civil Penalty Accreditation Scheme (CPAS)⁵. Membership can reduce penalties by up to 50%, recognising the proactive steps taken to prevent clandestine entry.

"Clandestine entries to the UK would probably be between 20,000-40,000 a year"

David Wood, the former head of immigration enforcement for the Home Office

The Independent Chief Inspector of Borders and Immigration Report

The Independent Chief Inspector of Borders and Immigration (ICIBI) inspected the Border Force operation to deter and detect clandestine entrants at the juxtaposed controls in northern France⁶. Between August and November 2024, the inspection reviewed working practices closely in Calais, Coquelles and Dunkerque, and also in respect of the administration of the Clandestine Entrant Civil Penalty Scheme (CECPS) and Civil Penalty Accreditation Scheme (CPAS).

⁴<https://www.gov.uk/guidance/clandestine-entrant-civil-penalty-scheme>

⁵<https://www.gov.uk/government/publications/civil-penalty-accreditation-scheme/civil-penalty-accreditation-scheme>

⁶<https://www.gov.uk/government/publications/an-inspection-of-the-border-force-operation-to-deter-and-detect-clandestine-entrants-to-the-uk-august-2024-november-2024>

The report attributed front-line Border Force staff for professionalism and commitment, as well as cooperative working with industry partners. The report revealed that multi-layered security and investment in infrastructure have reduced clandestine entrant detections in these ports by a significant amount - from over 56,000 in 2016 to about 5,000 in 2024. However, the relationship between small boats and clandestine entry through the juxtaposed ports was not well understood. The inspection nonetheless did find several areas of weakness in the operation.

These were the absence of a single senior operational lead with clear responsibility for dealing with covert entry, unreliable or incomplete data capture, and less use of intelligence to determine where and how resources are deployed. Technology such as CO₂ sensors, heartbeat sensors and passive millimetre-wave scanners is not necessarily being applied to maximum effect, often because there are skill gaps or uneven deployment. The programs aimed to discourage clandestine crossing - CPAS and CECPS - were also criticised for slow processing, ineffective engagement with industry, and unclear or unachievable mandates.

The ICIBI made seven recommendations, to which The Home Office broadly welcomed the ICIBI's inspection findings, particularly its recognition of the commitment and professionalism of Border Force officers and the constructive relationships with industry partners. It acknowledged the need to strengthen leadership, improve data and analysis, and ensure operations keep pace with evolving threats from organised criminal groups.

Two recommendations were accepted in full - appointing a senior operational lead for clandestine entry work and carrying out a comprehensive review of the Civil Penalty Scheme. These will be addressed through the creation of the new Border Security Command, which will have clear oversight of clandestine entrant operations, and through modernising penalty processes with the introduction of new systems.

Four recommendations were partially accepted. The Home Office committed to improving analytical capability and performance monitoring, enhancing officer training, and developing more effective engagement with industry, but it stopped short of fully meeting the inspector's proposals. It also agreed to improve transparency on penalty scheme performance, though without committing to the publication of a formal annual report.

One recommendation - to roll out integrated ANPR systems across all juxtaposed ports in France - was not accepted, with the Home Office citing concerns over cost and value for money.

Overall, the response signals a willingness to act on most of the inspection's findings, but with a more limited scope and pace of delivery than the ICIBI had called for.



Summary of ICIBI Recommendations and Corresponding Response from Government

- Assign a single senior leader for clandestine entry operations:** Accepted in full – The newly created Border Security Command (BSC), under a designated Border Security Commander, now provides clear ownership and oversight over clandestine entrant operations.
- Improve analysis, intelligence, and performance monitoring:** Partially accepted – The Home Office is enhancing its analytical capabilities and already taking steps to deliver better data and insights for operational decision-making.
- Provide targeted, flexible training for Border Force officers:** Partially accepted – Plans are in motion to update training, though full implementation timelines are yet to be detailed.
- Install integrated ANPR systems across all French juxtaposed ports:** Not accepted – The Home Office rejected this recommendation, citing cost-effectiveness concerns.
- Carry out a comprehensive review of the Civil Penalty Scheme (CECPS):** Accepted in full – Work has begun to modernise the penalty system, including improved procedures via the new Integrated Platform Management (IPM) system.
- Develop and publish an engagement plan for industry stakeholders:** Partially accepted – The Home Office is working on better industry engagement but has not fully committed to publishing a plan yet.
- Publish an annual report on the performance of the CECPS:** Partially accepted – While the Home Office intends to improve transparency, no specific commitment to a published annual report has been made.

Industry response to the UK system

The RHA fully supports sensible and robust measures to protect the UK's borders, deter clandestine entry, and penalise those who do not take reasonable steps to secure their vehicles. However, operators are increasingly frustrated that the current penalty regime is penalising those who have done everything they reasonably can, only to find themselves facing heavy fines⁷.

RHA called for a proper and thorough review of the Clandestine Entrant Civil Penalty Scheme (CECPS) and the vehicle security check-lists so they reflect today's reality - particularly the increasingly sophisticated methods organised criminals use to get people into vehicles. We also want Border Force staff to receive better training on vehicle security, clearer guidance for drivers on what to do if they suspect someone is on board (without putting themselves at risk), and better routes for drivers to get help from UK and European authorities without fear of punishment.

From our members' experience, the way the scheme is applied is far from consistent. Suggested preventative measures are sometimes impractical or ineffective, like wrapping brand-new cars in plastic or adding sheeting where it's not needed. Check-lists can be accepted in some cases but rejected in others, and the process for joining CPAS, that recognises operators with strong vehicle security systems and protocols, offering up to a 50% reduction in any penalties for clandestine entrants, is painfully slow, with long delays and no recognition for operators with pending applications.

There are deeper problems too. Joint and several liability rules mean operators can be left paying both their own and the driver's fine when a driver leaves the company. Border Force doesn't apply discretion at the border, even where it's obvious that entrants entered a vehicle after a check or that a driver couldn't reasonably have prevented it. Further, discounts for compliance under the scheme are applied on an "all or nothing" basis - operators and drivers must meet every single requirement to receive the 50% reduction, and missing just one means no discount at all.

Other unfair situations include penalties when drivers had the right paperwork but couldn't produce it due to language barriers, cases where Border Force's own checks missed entrants, or where people switched vehicles mid-ferry. Operators have been fined for trailers left in secure compounds outside their control, and even where camera footage proves entrants boarded while the vehicle was moving.

There's inconsistency in how self-reported incidents are treated - some drivers get a reduction, others don't - and we've seen contradictions between original penalty notices and the letters upholding them.

The scheme also ignores health and safety facts like threats posed by armed intruders and does not account for particular kinds of loads that make certain checks impractical or irrelevant.

In short, whereas the scheme's purpose is correct, in practice it's too rigid, unevenly enforced, and routinely ends up punishing those who are going in the right direction.

The IRU contributed to the UK governments revision of its CECPS in 2022 with the following key points and regrets that the UK has since lost interest in continuing this dialogue, although it is keen reopen constructive cooperation.

- The EU remains a key trading partner of the UK, making up nearly 50% of all goods traded, 70% of which are carried by road.
- Challenges posed to all freight operators working between UK and EU continually increase, estimated at £1 billion pa - damage to vehicles, insurance costs, lost time and revenue.
- Many EU transport companies have decided not to serve the UK market due to the significant financial and indeed physical risks of the clandestine issue, which increases the overall supply chain risk to the UK economy which relies on cross border road transport.

- The general situation with illegal migration has led to Member States reintroducing border controls on a temporary basis, with punitive fines for operators found to have illegals on board.

The IRU's Associate Director for EU Goods Transport, **Marc Billiet**, has been heading the organisation's dialogue with the UK and the EU Commission in Brussels regarding the clandestine problem for years. The IRU expects a stronger commitment from EU institutions and Member States to support the road transport industry in its fight against cargo crime and migrant smuggling / trafficking, as well as a clear recognition of the efforts undertaken by the industry to combat the use of commercial vehicles by organised crime groups.

With reference in particular to the UK CECPS policy, the IRU recommends some changes as follows:

- No increase of the current penalty levels for clandestine entrants found on board of a vehicle and no introduction of new penalties for the failure to secure vehicles.
- The presumption of innocence for transport operators that have adopted adequate security actions. Transport operators can already lose their operating licence due to proven trafficking or people smuggling activities.
- An in-depth overhaul of the existing ten-point code of good practice which serves a security checklist for drivers and operators, plus an update of the voluntary haulier accreditation scheme to encourage security awareness an action. The systematic use of these tools by companies and drivers could be linked to an exemption of penalty liability.
- Encouragement of incident reporting by companies and drivers with a proper follow up by the competent authorities in the UK or Member States. Reporting could also be linked to an exemption of penalty liability.

We don't have a scheme like UK has (code of practice/ clandestine civil penalty act) since we believe it's unfair and basically puts the burden of a worldwide problem like smuggling/immigration on the shoulder of the carrier/transporter, with huge penalties as a consequence, but we understand that UK wants to combat illegal smuggling, as The Netherlands does also. The approach however differs.

Elmer De Bruin, International Manager at Transport and Logistics Netherlands

⁷<https://www.rha.uk.net/news/news/detail/clandestine-penalties-report-invest-to-tighten-borders-against-clandestine-entrants-says-rha>

International Comparison

Fundamentally, The USA and Europe approach enforcement differently to the UK. Enforcement comes under criminal sanction, and truck drivers and operators are innocent until proved guilty, or at least until intent is proved. This is the usual practice in countries operating under the rule of law.

Conversely the British system, which is categorised as “civil”, issues a penalty at first instance, to which drivers and operators then must prove their innocence/compliance with the code in order to have the fine revoked or reduced.

European Union

As part of the Action Plan against Migrant Smuggling, the European Commission has proposed several measures to “prevent and counter the facilitation of unauthorised entry, transit and stay of third-country nationals in the EU” (COM(2023)755)⁸ in November 2023. This directive mandates minimum standards for member states to meet in their own criminal codes.

In response to these measures the IRU called for:

- I** A clear description of the procedures that road transport operators and their staff can follow and on the basis of which they can provide evidence, defend themselves and prove their innocence. There should be guarantees that such procedures be put in place in all Member States.
- I** A more precise definition of the circumstances in which a road transport company and its staff can be held liable for the potential facilitation of unauthorised entry, transit and stay of third country nationals in the EU.
- I** The possibility of a fair trial, based on the presumption of innocence, where an operator or driver is provided the opportunity to be heard, and to prove their innocence and has the possibility to appeal against any decision, is essential. Only operators, managers or drivers for whom it has been established prima facie evidence that they have been intentionally involved in people trafficking and / or migrant smuggling should become the subject of investigation and prosecution.
- I** A transport company or its staff should not be held liable for any harm to third-country nationals due to the latter’s actions in attempting unauthorised boarding of a vehicle unless they are willingly and knowingly involved.
- I** A simple lack of oversight and control should not be a sufficient condition to make a company liable. Knowing and willing involvement with actual or promised financial or material benefit or intention to cause harm to a person should be established.
- I** A clear description of the procedures that road transport operators and their staff can follow and on the basis of which they can demonstrate and prove that they have done everything in their power to avoid involvement in third-country nationals boarding their vehicle unauthorised, and a guaranteed right to present their case before any decision is made against them.
- I** A simple checklist to demonstrate with accompanying proof that all necessary measures have been undertaken to prevent unauthorised boarding by third-country nationals before any further drastic measures against them are considered.

The EU Border Agency Frontex emphasises the importance of strengthened border controls to make the influx of illegal migrants unattractive and to prevent unexpected mass flows.

Finally, according to the Global Initiative against Transnational Organised Crime, European investigative authorities should conduct in-depth investigations into Kurdish smuggling networks, as there is a blind spot regarding the Kurdish role in human smuggling within Europe.

⁸<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52023PC0755>

Country Profile:

Germany



- Land bordered with ten other countries, all of which are in the Schengen zone i.e. should be practically borderless.
- Identity checks have largely been removed, although some checks have been reintroduced at internal borders.
- Illegal migrants will generally use smaller border crossings, often in plain sight, so there is little use of trucks as a means of smuggling and therefore the border controls do not focus on border lorry checks.
- Prosecutions only brought against those actively involved in people smuggling/trafficking – no penalty for insecure vehicles.

Source: Daniel Torres Head of International Transport, Federal Association of Road Haulage, Logistics and Disposal (BGL) e.V.

Country Profile:

Greece



- Road transport operators continue to face challenges with clandestine immigration at the Greek borders, particularly at Turkey land border and west coast ports with ro-ro ferries to Italy.
- Increased security measures at main pinch points for migrants boarding trucks over the last 2-3 years have improved matters.
- Greece holds refugees in camps on islands in the Aegean Sea, at which migrants are supported to make legal claims for asylum in the EU.
- Most migrants are coming from the Middle East region such as Syria, plus Pakistan and Afghanistan.
- Greece is treated as a transit country to be crossed as fast as possible, due to countries to the west of Europe being seen to offer more migrant support, and higher paying jobs.
- Where hauliers have been caught with migrants on vehicles, trucks have been held and drivers imprisoned.
- Industry is extremely aware of the need to demonstrate that all reasonable precautions have been taken to prevent entry to their vehicle, but there is no officially recognized checklist along the lines of the UK.

Source: Iro Doumani, General Manager of the Hellenic Federation of Road Transport (OFAE)

Country Profile:

The Netherlands



"The Dutch asylum policy has been significantly tightened over the last few years, due to a right-wing government and numerous measures have been taken to curb the number of asylum seekers.

In terms of transport and logistics, this is particularly evident in the introduction of border controls. Like Germany, the Netherlands has made use of the option to introduce temporary border controls at border crossings to stop illegal immigrants. This will remain in place until mid-December 2025. In addition, the Netherlands is attempting to carry out more intensive checks, particularly at its external border (the ports), on lorries travelling to the UK by ferry."

Elmer De Bruin, International Manager at Transport and Logistics Netherlands (TLN)

Country Profile:

USA



The geography of the United States means that the problem of trafficking operates on two distinct platforms;

- People trafficking tends to be done openly in plain sight, and is used to move an individual clandestinely around the country to be used in the grey economy or modern slavery. Tractor trailers are often used to collect and transport individuals who have just crossed the US-Mexico border.
- The smuggling of people hidden in semi-trailers through border states like Texas, as a means to get large numbers of illegal foreign nationals into the US in order to work and stay illegally. This is often one of the final steps in a process that can begin months before somewhere in Mexico, Honduras or Guatemala thousands of miles from the Border.

In 2023, over 9600 potential human trafficking cases encompassing nearly 17,000 potential victims were reported to the National Human Trafficking Hotline.

As a result of crossing both federal and international borders human trafficking is a federal level crime, with various Acts of Congress setting out punishments. Maximum sentences can range from a few years behind bars and to the death penalty. Such acts include:

- Trafficking Victims Protection Act (TVPA), first passed in 2000 and reauthorised most recently in 2019
- No Human Trafficking on Our Roads Act, which establishes a lifetime ban for a Commercial Drivers Licence (CDL) for any driver convicted of human trafficking

ATA encourages all trucking companies and organisations to provide anti-human trafficking training programs for their drivers and professional staff. Since 2012, through a partnership with TAT (formerly Truckers Against Trafficking), ATA's Americas Road Team Captains are trained as ambassadors, speaking to their peers, law enforcement and others about the industry's commitment to stop the crime and how to get trained and engaged to join the fight.

Sources:

Kylla Lanier, Deputy Director, **Truckers Against Trafficking (TAT)**,

Nikki Thomas, Vice President, Industry Affairs, & **Bob Costello**, Chief Economist & SVP, International Trade & Security Policy American Truckers Association (ATA),

Martin Rojas, Senior Advisor, Washington, International Road Transport Union (IRU Americas)

Case Study: Illegal Entry via Lorry through the Netherlands

Since 2017, The Rotterdam Seaport Police's Border Team reports it has been dealing with an increase in human trafficking via cargo ferries to the United Kingdom, which aligns with the major investment in security at Calais/Coquelles and the growth in small boats. In addition to guarding the maritime external border, preventing incidents that could have fatal consequences for illegal migrants is therefore also a daily task, and changes in international trends and developments require constant attention and integrated efforts with supply chain partners and the business community to tackle the growing problem.

Access Routes & Methods

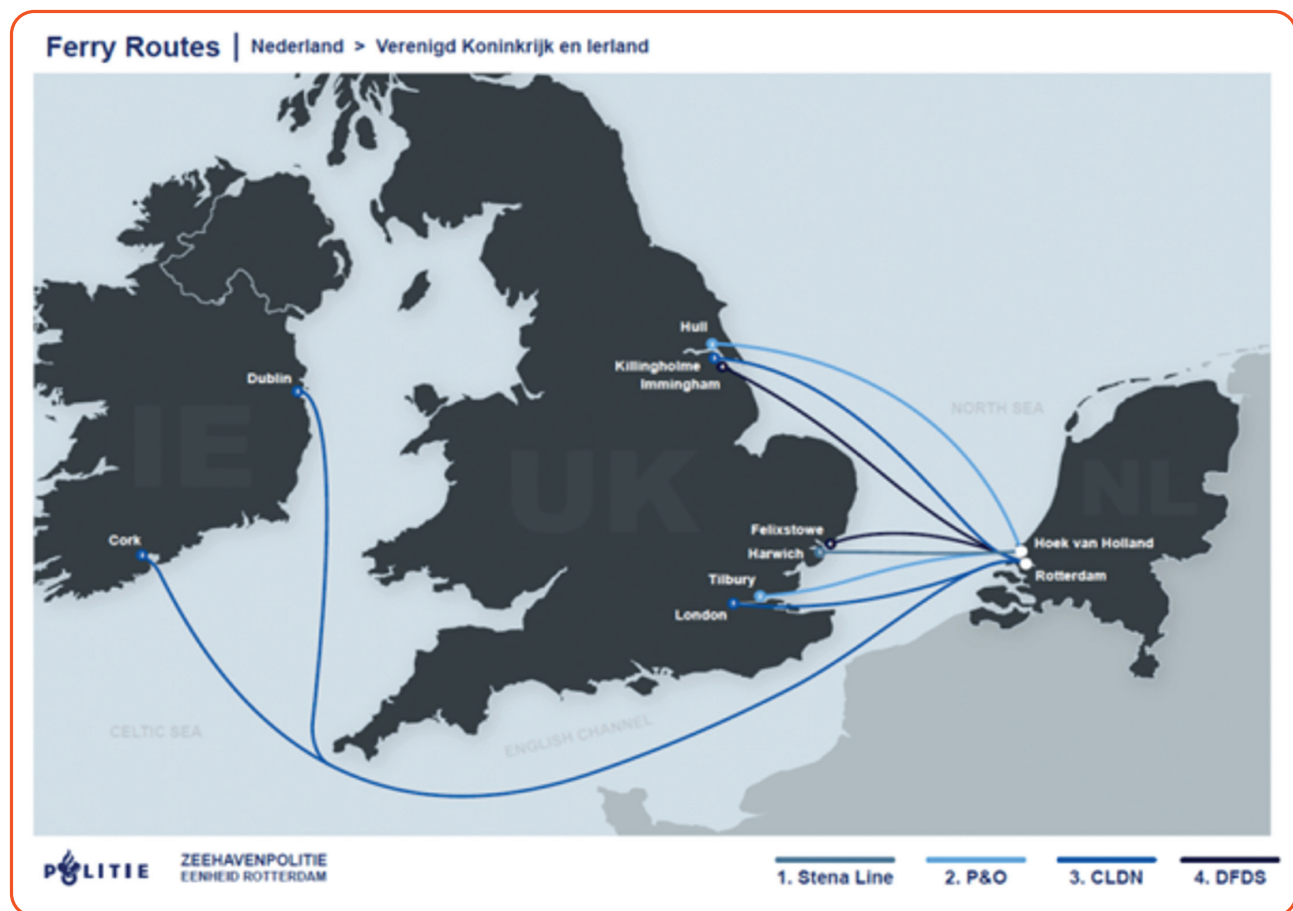


Fig. 9 – Ferry routes between the Netherlands and the UK & Ireland

Cargo ferries from the Netherlands to the United Kingdom are operated by P&O (arriving in Hull), CLDN (arriving in Killingholme) and DFDS (arriving in Felixstowe and Immingham). Felixstowe is the largest container transshipment port in the United Kingdom, accounting for 48% of all incoming and outgoing containers – almost 4 million containers per year. By comparison, the port of Rotterdam handles approximately 15 million containers¹⁰

⁹Zeehavenpolitie Eenheid Rotterdam

¹⁰<https://porteconomicmanagement.org/pemp/contents/part3/changing-geography-of-seaports/evolution-port-rotterdam/>.

Small Boats

The use of small boats to smuggle migrants into the United Kingdom has become the most common modus operandi in the space of two years. According to figures from the British government, 299 individuals reached the United Kingdom by small boat in 2018, while in 2024 the total number was 36,816

There are two main ways in which stowaways gain access to trailers and vehicles to illegally cross the border via cargo ferry.

Firstly, foreigners gain illegal access to a trailer, either outside the ferry terminal where lorries are stationary (rest areas and petrol stations) or by gaining illegal access to ferry terminal premises by destroying fencing or climbing over it, after which they climb into a trailer parked on the premises. They gain access to the trailer by destroying the tarpaulin of a curtain-sided trailer or cutting the TIR line in places.

The second method is to hang onto or sit on the axles under lorries shortly before they enter the terminal. This happens where the lorry stops briefly, e.g. at a bus stop or traffic lights, and access from behind so that the driver cannot see them in his mirrors. They often take advantage of twilight so that they are less likely to be noticed, meaning more incidents occur in the winter months.

Preventative and Enforcement Measures

A stowaway or axle hanger commits criminal offences such as illegally entering premises (Art. 461 of the Criminal Code¹¹) and illegally crossing the border if the UK is reached. The smuggling of an illegal migrant is considered a crime of human trafficking (Art. 197a of the Criminal Code¹²) if there is financial gain involved.

Dutch transport companies risk heavy fines imposed by the authorities in the United Kingdom if stowaways are only discovered in English ports. Transport and Logistics Netherlands (TLN) is in direct contact with the British border authorities on this matter and informs its members what is expected of them.

When an illegal migrant has managed to make the crossing, the person is either admitted to an asylum procedure in the United Kingdom (category UK left behind) or returned on board the ferry in question (UK sent back). In the latter category, the case is processed by the Border Crossing Point and the Return and Departure Service proceeds with deportation from the Netherlands.

In recent years, authorities have focused on improving supervision and on eliminating opportunities for human trafficking. Such measures include cutting back bushes at boarding points for axle hangers, installing or relocating fences, restricting access and installing cameras. Increased use of dogs to detect human scent has been particularly effective, with teams now using two dogs at once to increase coverage. Innovation and digital transformation are also crucial e.g. the use of different types of drones to effectively monitor lorries and sites.

The continuous strengthening of the intelligence position ensures that there is greater awareness of what is passing through the port and where things are going wrong. Cooperation with private partners also contributes to a reduction in human trafficking via cargo ferries. Direct contact and increasing the resilience of the private sector are important in this regard.

In addition, transport companies use a checklist for vehicles within the framework of the Transport Liability Scheme. Companies also issue instructions to transport companies, such as avoiding notorious parking areas. The volume of freight transport via Rotterdam continues to increase. TLN therefore emphasises the importance of the business community anticipating this and not just looking to the government. A good example is the so-called 'Poznan train' arriving on the Moezelweg. Stowaways used to climb onto the train, but after a number of joint actions, this has not been a problem for two years now.

The current policy framework for tackling human smuggling aims to further strengthen the digital capacity, expertise and technology of the Royal Netherlands Marechaussee, the police and the Public Prosecution Service in order to combat online activities related to human smuggling more effectively and to be able to anticipate trends and developments better.

¹¹<https://antislaverylaw.ac.uk/wp-content/uploads/2019/08/Netherlands-Criminal-Code.pdf>

¹²<https://antislaverylaw.ac.uk/wp-content/uploads/2019/08/Netherlands-Criminal-Code.pdf>

What Trends are we seeing?

It is established by UK Government figures that illegal entrant activity comes in cyclical peaks and troughs over periods of several weeks. Case studies by the Seaport Police also reveal weeks with more incidents and weeks with fewer incidents involving cargo ferries. There is no clear explanation for this, but there are various factors that may influence it, such as:

- Weather conditions:** While not as significant a modifier as for small boats in France, local weather conditions in the Netherlands do have an influence, particularly on the modus operandi of axle hangers. The winter period also plays a role, as it gets dark earlier and stays dark longer.
- (Geo)political developments:** these seem to influence the nationalities of illegal migrants who are found. Since the change of power in Syria at the end of last year, for example, there has been an increase in illegal migrants of Turkish nationality, some of whom are of Kurdish origin, on cargo ferries. There was also a temporary increase in illegal migrants who wanted to travel in larger groups (10 to 12 people) via the freight ferries. Recently, more Turkish drivers have been involved in incidents. This whole picture had not been observed for a long time. It seems as if there is (temporarily) more Turkish involvement in smuggling, but a clear European picture cannot yet be given. Following the recent arrest of a driver, the number of incidents has decreased, but vigilance remains important.
- Shifts in migration routes:** smuggling networks are highly adaptive to new circumstances and migrant flows change rapidly. There are more checks on the Western Balkan route, but at the same time there has been an increase in violence, possibly due to the accumulation of illegal migrants. This may have an impact on the route taken by Turkish smugglers.
- Concentration of migrants:** as indicated earlier, migrants do not travel directly from their place of departure to the United Kingdom. They enter and travel through Europe in various ways and stay in certain areas while awaiting the green light to depart.
- Labour market conditions:** many illegal migrants seek to enter the United Kingdom for work. When seasonal work on the European mainland ends, migration to the United Kingdom increases.
- Availability of materials:** various nautical goods are needed for smuggling via small boats. These items are mainly purchased in Turkey and transported from the Netherlands or Germany to the French coast. The timely supply of these materials influences the departure of illegal migrants via Calais.
- Dismantling smuggling networks:** this has a direct impact on the logistical supply of both materials and migrants and can (temporarily) shut down a particular route.
- Social media:** this appears to play a role in determining the route to be used. If a route is successful, it is shared within the network. Investigations have revealed that illegal migrants receive instructions via TikTok, for example, to attempt the crossing via a cargo ferry instead of from Calais. Even if migrants want to make crossings on their own, they use information from social media.

Overview of illegal migrants found at the Rotterdam Ports Border Crossing Point (as of 23 March 2025)

Point of Discovery	2018	2019	2020	2021	2022	2023	2024	2025
Netherlands	597	390	434	641	330	136	65	16
UK left behind	52	84	21	52	17	16	20	15
UK sent back	64	2	25	23	11	14	18	1
Portugal sent back	4		4	11				
Ireland sent back		2		2	2	3		2
Ireland left behind	6	3						
Total	723	481	483	729	360	169	103	34

Fig. 13 - Point of discovery of illegal migrants originating at Netherlands ferry terminals. When an illegal migrant has managed to make the crossing, the person is either admitted to an asylum procedure (left behind) or returned on board the ferry they arrived in (sent back).

There has been a substantial decrease in smuggling via cargo ferries from the Netherlands. This is attributed to the greater chance of success from Calais than from the Netherlands, despite the danger involved, partly because controls in the Netherlands are more frequent and increasingly effective. This has also been observed by private parties involved, such as the ferry company DFDS and the transport company International Road Ferry (IRF).

An overview of the top five nationalities of illegal migrants found shows that the largest group comes from Albania, and the second largest group from Afghanistan. It is important to note that the figures in this overview refer to incidents and not to unique individuals (therefore not considering recidivism).

Nationalities	2018	2019	2020	2021	2022	2023	2024	2025	Total
Albanians	515	150	260	401	95	64	64	4	1553
Afghans	84	112	123	257	207	87	8		878
Eritreans	61	25	20	7					113
Iraqis	16	54	5		2	5		3	85
Turks				7	18		23	13	61

Fig. 14 - Nationality of Illegal Immigrants found at Netherlands Ports.

Despite these figures, illegal migrants are apparently still managing, even in groups, to reach the United Kingdom by cargo ferry. It is precisely this group activity that is cause for concern, as it indicates an organised form of human smuggling. It is therefore important to look at what each party can do to take a step forward and put up additional barriers. This could involve making more active use of existing consultation structures and sharing findings with integral partners but also encouraging the business community to develop even better infrastructure or additional preventive measures in the context of controls.

¹³Climbers and hitchhikers - Human trafficking via the Netherlands" - Transport en Logistiek Nederland

¹⁴Climbers and hitchhikers - Human trafficking via the Netherlands" - Transport en Logistiek Nederland

Conclusion

There is no doubt that the UK CECPS policy is not fit for purpose and is urgently due for a review. The solution should start from the realisation that the challenges related to clandestine immigration are not unique to the UK. All countries en route to the UK, with or without ports, are affected by this issue, as criminal acts that lead to clandestine migration occur on their territories. This naturally leads to the conclusion that the UK cannot address this challenge alone. It is essential that drivers and road transport companies can rely on authorities for security support when needed and that international partnerships are built to assist our industry. The RHA and our global partners in the road transport industry remain committed to work with the UK government and relevant competent authorities to find a workable solution to this significant problem.

“Border control on its own we know just doesn’t work... The process should be more about encouraging people not to take these dangerous trips in the first place.”

Former police officer





About the RHA

■ The RHA is the leading trade association representing over 8,500 road haulage, coach and van companies across the UK, 85% of whom are small and medium-sized enterprises (SMEs). Our members are operators of vehicles who, between them, operate around 250,000 HGVs (half of the UK fleet) out of 10,000 operating centres and range from a single-truck company to those with thousands of vehicles. The UK road haulage sector is responsible for 81% of all freight movements and is directly involved in the transportation of 98% of agricultural products.

To find out more, visit: www.rha.uk.net

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