

HUMAN RIGHTS WATCH

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June 13, 2018

Mr. Abdullah Ayaz,
Acting Director General
Directorate General for Migration Management
Ministry of Interior
Ankara, Turkey

Sent via fax: +90 312 422 09 00; email: disiliskiler@goc.gov.tr and
uluslararasikoruma@goc.gov.tr

RE: Turkey's Suspension of Syrian refugee registration

Dear Mr. Ayaz,

We are writing to seek your comment regarding the current status of Syrian refugees in Turkey. As you may know, Human Rights Watch is an independent non-governmental organization that monitors and reports on human rights abuses in more than 90 countries around the world.

We recognize Turkey's generous hosting of three and a half million Syrian refugees and applaud its commitment to providing them with basic services, including access to medical care and education. We have repeatedly called on the European Union and other states to increase their support to Turkey and to take greater responsibility for hosting and processing Syrian and other refugees and asylum seekers, including by increasing resettlement of Syrians from Turkey.

Turkey has a continued obligation not to forcibly return Syrian asylum seekers and refugees to their country and not to deny them access to urgently needed medical care and primary education.

Our questions are based on information we obtained during Human Rights Watch's recent visit to Hatay Province in mid-May relating to

registration procedures for Syrians and to the treatment of Syrians denied access to registration.

In late October 2017, the Hatay Governor's office announced the suspension of registration in Hatay province and authorities in Istanbul suspended registration in mid-February 2018. Numerous agencies working with Syrian refugees in Turkey, told us that in practice authorities have also suspended registration for all but a few Syrians arriving since late 2017 or early 2018 in the following provinces: Adana, Gaziantep, Kilis, Mardin, Mersin, Osmaniye, and Şanlıurfa.

In addition, Turkish law says Syrians only may travel between cities in Turkey if they have registered for temporary protection and obtained a travel permit. This means unregistered Syrians are unable to lawfully leave Hatay Province – where the vast majority of new arrivals enter Turkey through the remaining gaps in Turkey's border wall – and travel to other provinces where registration is ongoing. This forces them to live in Hatay province, or to use smugglers to travel to other parts of Turkey.

We also understand that Turkey has rejected proposals to refer Syrians arriving in the above border provinces, which accommodate large numbers of Syrians, to other provinces with fewer Syrians.

29 Syrians who had been refused registration told us hospitals and schools had turned them away for not having a temporary protection permit, while relatives of three Syrians rejected at registration offices and returned by Turkey to Syria said their relatives had been deported for not having a permit. All of the Syrians we spoke to said they, and all other unregistered Syrians they knew, lived in constant fear of arrest and deportation for unlawful presence and that they severely restricted their movement in the province.

Human Rights Watch also interviewed agency officials working with refugees in Turkey's provinces bordering Syria. They described Turkey's strict regulations requiring them to obtain special permission to assess registered Syrians' assistance needs and visit their homes, including in some cases in the presence of staff from the Ministry of Family and Social Policies. The agency officials said that Turkish authorities apply the rules in an ad hoc and unpredictable way, depending on the location and mood of the local authorities, and that they live in constant insecurity about what refugee outreach activities they are in fact allowed to do.

As a result, agency officials say they are unable to identify Syrians blocked from registration procedures in order to help them get registered, avoid deportation and access

urgently needed services. It also means they are unable to estimate the extent of registration and assistance needs and deportations.

Agency officials say that if they are made aware of unregistered Syrians who are seeking help, or come across them by chance, they sometimes raise the most vulnerable cases with the authorities to get them registered. However, they said that between November 2017 and mid-May, the total number of such cases which have been registered on an exceptional basis is in the low hundreds.

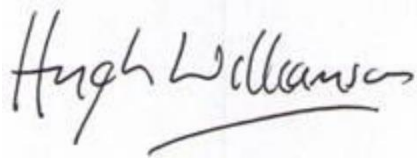
Finally, refugee agencies told us that the authorities in Antakya established a registration center in early 2018 for unregistered Syrians who say they want to return to Syria. UNHCR officials said Turkey has not given them permission to monitor whether Syrians signing up for return in that center are in fact choosing to return voluntarily or whether their unregistered status, and resulting fears, are coercing them into deciding to return. Turkey allows UNHCR to monitor the voluntariness of registered Syrians asking to return to Syria, and we are concerned that UNHCR has been excluded from this new center.

In light of these findings, we would be grateful if you could answer the following questions:

1. Why has Turkey suspended registration of newly-arriving Syrians (entering Turkey since late 2017) in Adana, Gaziantep, Hatay, Kilis, Mardin, Mersin, Osmaniye and Şanlıurfa provinces?
2. Will registration for Syrians resume in those provinces, and if so, when?
3. If there is no plan to resume registration in all or some of those provinces, will Turkey refer Syrians arriving in those provinces to other provinces for registration?
4. How many undocumented Syrians in Hatay province has Turkey apprehended, and deported from the province since 1 November 2017 on the grounds that they had not registered for temporary protection permits?
5. How many unregistered Syrians have approached authorities in the newly-established center in Antakya saying they would like to return to Syria, and what procedures do you follow to ensure their decision is not due to fear of arrest and deportation or denial of access to healthcare, education or other urgently needed help such as housing support?
6. Why have you excluded UNHCR from monitoring the voluntary nature of returns arranged from the new registration center in Antakya?
7. Why are agencies working with refugees in southern Turkey not allowed to proactively and freely identify unregistered Syrians to help them register and access services?

Human Rights Watch plans to publish our findings in mid-July 2018 and would incorporate any response to our findings and questions received before June 30. We thank you for your time and consideration of this matter. Please contact us should you have any questions or need further information.

Yours sincerely,

A handwritten signature in black ink that reads "Hugh Williamson". The signature is written in a cursive style with a long horizontal stroke at the end.

Hugh Williamson
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A handwritten signature in black ink that reads "Sarah Leah Whitson". The signature is written in a cursive style with a long horizontal stroke at the end.

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