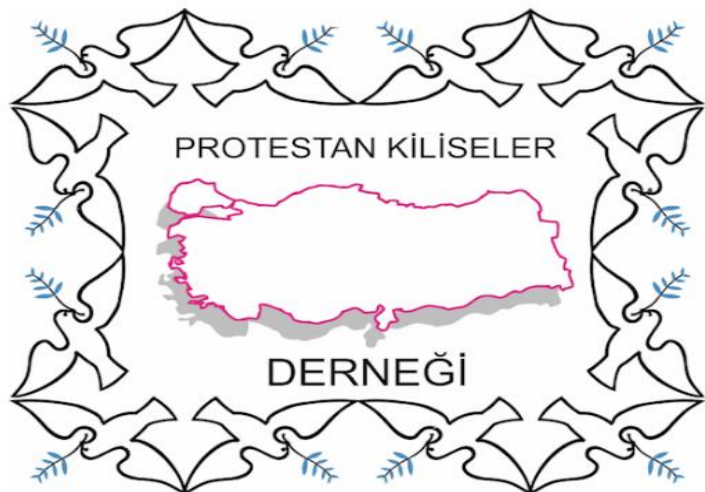




*defending
the religious
freedom of
Christians*



Universal Periodic Review: Stakeholders' Report

TÜRKIYE: Rights violations against Christians

Joint submission to the United Nations Human Rights Council's
Universal Periodic Review Working Group; 49th session; 4th UPR Cycle

11 October 2024

Submission by:

Middle East Concern

Open Doors

Association of Protestant Churches (Protestan Kiliseler Derneği)

Brazilian Institute of Law and Religion (Instituto Brasileiro de Direito e Religião)

Middle East Concern was founded in 1991, and seeks to promote freedom of religion or belief in the Middle East and North Africa, with a focus on the Christian communities.

Open Doors supports communities of Christians in more than 60 countries where their fundamental rights are violated because of their faith.

The **Association of Protestant Churches** (Protestan Kiliseler Derneği) was established in 2009 and represents many of the Protestant churches in Türkiye and monitors and reports on rights violations against the Protestant community.

The **Brazilian Institute of Law and Religion** (Instituto Brasileiro de Direito e Religião) is a civil association that works in teaching, defending, promoting, and protecting human rights, particularly the rights to freedom of religion or belief, freedom of expression, and freedom of conscience.

METHODOLOGY

1. The information on violations documented in this report was gathered by the above-named organisations, in collaboration with credible contacts, including the victims of these abuses and their lawyers, as well as through research and analysis of copies of official documents, such as court decisions.

BREADTH AND FOCUS

2. Whilst rights violations are also suffered by other religious or belief minority communities in Türkiye, this report focuses on rights violations against Christians, with particular focus on the situation of Protestant Christians. The report focuses on State-led violations, and it focuses on violations of the right to Freedom of Religion or Belief ('FoRB') under Article 18 of the International Covenant on Civil and Political Rights ('ICCPR'), as well as of other rights under the Covenant. The actual number of members of the Christian community who experienced rights violations connected with their faith and the forms of violations experienced within the reporting period extend considerably beyond those articulated in this joint submission. This report focuses on some of the more serious forms of rights violations against Christians, including those violations that are gravely stifling Protestant communities and threatening the continued operation and existence of the Protestant Church in Türkiye. It is believed many cases of rights violations in Türkiye go unreported and it is known that many others are handled discreetly, often due to fear on the part of victims or their families that public exposure may worsen their situation. In these circumstances our reporting on violations and cases thereof does not capture the full extent and total number of violations. As such, our reporting should properly be considered indicative of broader such violations.

3. This report focuses on violations which have occurred since Türkiye's last Universal Periodic Review, with a particular emphasis on more recent concerns and the current situation.

BACKGROUND AND LEGAL OVERVIEW

4. According to the Turkish government, the population of Türkiye is 99% Muslim.¹ The majority of Türkiye's Muslims are adherents to the Sunni branch of Islam. Religious minorities include Christians and Jews. The Protestant Christian community in the country numbers about 7,000 Turkish converts from Islam who are regular attendees of churches. This is in addition to ethnic Armenian and Assyrian Protestants and Protestants who are expatriates, refugees or asylum seekers, including Christian converts from Iran who fled Iran due to rights violations against them by State actors there. The Protestant community in Türkiye is estimated to number 20,000 – 25,000 people in total. Over the past century, the percentage of Christians in Türkiye's population has fallen from approximately 20 percent to a small fraction of one percent (estimated to be 0.2%), partly attributable to governmental mistreatment of Christians.

5. According to the 2023 Human Rights Violation Report prepared by the Association of Protestant Churches (Protestan Kiliseler Derneği), as published in 2024², the Turkish Protestant community is made up of about 205 small and large fellowships, the majority of which are found in Istanbul, Ankara, and Izmir. Only 12 congregations meet for worship in traditional church buildings. Another 171 fellowships meet in their own or rented premises, which have limited legal recognition. The remaining fellowships meet informally in houses or offices.

6. Domestically, amongst protections related to religion or belief in the Turkish constitution, Article 24 of the constitution declares that "everyone has the freedom of conscience, religious belief and conviction."³

Reservation to Article 27 ICCPR

7. Türkiye ratified the ICCPR with a reservation to Article 27 on the rights of ethnic, religious, or linguistic minorities, stating it: "reserves the right to interpret and apply the provisions of Article 27 of the ICCPR in

accordance with the related provisions and rules of the Constitution of the Republic of Türkiye and the Treaty of Lausanne of 24 July 1923 and its Appendixes.” The reservation results in minority communities that are not specifically mentioned in the 1923 Treaty of Lausanne (such as the Protestant Christian community) being marginalised and subject to the whims of national and local authorities.

UN re 3rd UPR Cycle: Areas Needing Particular Attention and Recommendations

8. In a follow-up concerning the 3rd UPR Cycle on Türkiye, per a letter of 4 December 2020⁴, then High Commissioner for Human Rights, Michelle Bachelet wrote to Türkiye as to areas she considered needed particular attention over the then following four and a half years until the 4th UPR Cycle. Amongst the areas outlined were:

“Providing the conditions for freedom of religion and belief, in law and in practice, in compliance with international standards and treating all people equally regardless of religion.”;

“Ending discrimination against members of religious minority groups and speaking out against derogatory statements made against Jews, Christians and other religious minorities.”; and

“Continuing efforts to consult non-Muslim minorities with a view to addressing their challenges when electing members of their institutions.”

9. In its report as to the 3rd UPR Cycle, dated 24 March 2020, the UPR Working Group made recommendations to Türkiye including the following⁵:

64 Adopt an anti-discrimination law to prevent any type of discrimination based on ethnicity, religion, sexual orientation or gender identity (Honduras);

143 Redouble efforts to guarantee freedom of religion and belief, in law and in practice, particularly in the media (Haiti);

144 Provide the conditions for freedom of religion, in compliance with international standards (Poland);

147 Guarantee the freedom of thought and religion.... (Iceland);

151 End discrimination against members of religious minority groups (United States of America);

264 Urge State media and State leaders at all levels to meet their obligations under the Constitution’s article 10, treat all people equally regardless of religion, and speak against derogatory statements made against Jews, Christians, and other religious minorities (Solomon Islands);

265 Continue to take steps to promote and protect the rights of ethnic, religious and linguistic minorities, and combat discrimination, stereotypes and prejudice against minority groups (Thailand);

266 Promote social inclusiveness by strengthening and implementing anti-discrimination laws, including for all religious and ethnic minorities (Australia);

271 End the seven-year regulatory gap and proceed without further delay to the adoption and implementation of new electoral regulations so that Turkish citizens belonging to non-Muslim communities are able to elect their leadership and thus manage their charitable foundations (Greece); and

274 Continue efforts to consult non-Muslim minorities with a view to addressing the challenges faced by these minorities when electing members of their institutions (Lebanon).

10. Per the information set out below, rights violations have continued and the Turkish authorities remain deficient in the above detailed areas outlined by the said former High Commissioner, and as to the above cited recommendations of the said UPR Working Group.

RIGHTS VIOLATIONS

Training of Christian clergy not permitted (violations include of article 18 ICCPR)

11. Turkish legislation does not make provision allowing for the training of Christian clergy either in private establishments for higher religious education or through the public education system.

12. Article 24 of the Constitution regulates religious instruction and education with the following statement: “Education and instruction in religion and ethics shall be conducted under State supervision

and control.” Institutions that provide religious education can be opened by the State. According to Article 3 of Law No. 5580 on Private Educational Institutions: “education institutions identical or similar to ones which provide religious education cannot be opened.” The state therefore has the monopoly on both opening religious schools and determining obligatory or optional courses regarding religious education.

13. The Protestant community attempts to resolve the issue of training clergy by providing on-the-job training, giving seminars within Türkiye, arranging for study abroad, as well as utilising the support of foreign clergy which is now much less available for the reasons outlined below.

The Christian community and the problem of legal status (violations of articles 18 and 26 ICCPR)

14. State control of religion and an inadequate legal framework restrict opportunities for religious groups to have satisfactory legal status in Türkiye. The present situation does not allow for churches, including those recognised under the 1923 Lausanne Treaty, to obtain a legal identity as “religious congregations,” and this has consequences regarding their status before the law, leaving churches unable to buy or hold title to property or to press claims in court. Instead, they rely on independent foundations to hold and control each religious property.⁶

15. Protestant churches have attempted to acquire a limited legal identity by establishing associations and foundations, but without adequate provisions for legal status they lack formal recognition and are exposed to public suspicion and arbitrary treatment by the authorities.

16. The vagueness regarding legal status leaves the Christian community vulnerable in the event of criminal action, as the community - and indeed the local authorities - are in doubt about their legal rights, contributing to arbitrary treatment by the authorities and a reluctance to report abuses.

17. Changes made to the Law governing associations in 2020⁷ allow the Turkish authorities to appoint an administrator, put a stop to activities, seize the assets of an association and its directors, and demand a list of members. Additionally, there were changes concerning the collection of charitable donations. These amendments have restricted the right to association and make it less convenient for Protestant fellowships to form associations.

18. The present legal situation, which does not allow for Protestant congregations to obtain a legal identity as a “religious congregation,” also has consequences with regards to their right to gather in community in places of worship.

19. Throughout Türkiye there are many historical church buildings that have been appropriated by the State and reconfigured to give the building a secular function, such as a library, museum or cultural centre; or re-designated as a mosque. Local Christian communities are rarely permitted access to these historical church buildings for purposes of worship. Only 12 Protestant fellowships meet in traditional church buildings.

20. Seeking alternative venues, Protestant communities congregate in rented or purchased properties as associations or religious foundations. However, in such cases, requests to redesignate these properties as places of worship are often either rejected by municipalities or not even tabled as an item on the agenda for the municipal council to discuss. As a result, the meeting place is not recognised as a place of worship, but as the locale for the association or foundation. Unable therefore to claim the status and legitimacy of a place of worship or religious congregation, it cannot benefit from the tax and utility fee exemptions which are accorded to recognised places of worship.

21. When associations or foundations have applied to the authorities for recognition as a place of worship, they have received warnings that they do not meet zoning requirements and are liable to closure. City planning fails to consider the needs of religious minorities, and municipalities are therefore unable to direct church groups to a site that meets zoning requirements for a Christian place of worship.

Hostility towards Protestants and Protestant missionaries in media, education, and Turkish society; and Hate crimes against Christians including Protestants (violations of articles 18, 20, 26, 27 ICCPR)

22. Protestantism is seen as a Western and alien construct and continues to be viewed with suspicion by Turkish society at large. These misconceptions are not corrected by informed reporting in the media or by presenting a balanced perspective in the Turkish education system.

23. The school curriculum and the resources used in the classroom reflect the majority Turkish–Sunni perspective, failing to represent the country’s religious diversity. The subject area relating to Christianity is presented from the point of view of the Islamic religion and does not contain the opinions and views of Christians. Such a one-sided approach contravenes the right to freedom of religion or belief as laid out in Article 18 ICCPR.

24. The requirement to declare one’s faith to be exempt from Religious Culture and Moral Knowledge classes, or even to prove this faith, continues to be a violation of human rights. Decisions made by the Constitutional Court and local courts need to be implemented for this problem to be resolved.

25. The risk of discrimination has been reduced by the introduction of a new generation of identity cards which record the bearer’s religious affiliation on a chip rather than printing it visibly. As a result, complaints relating to this subject have decreased in recent years, becoming almost non-existent. However, the religion section should be completely removed from official documents. It should not be necessary to “prove” affiliation to a religious minority to be exempted from Religious Culture and Moral Knowledge classes.

26. The propagation of Christianity is portrayed in the media⁸ as a danger and political action that challenges Turkish Muslim identity rather than as an expression of personal faith. This misconception leads to hostility and sometimes violence against Protestant Christians, notably when three Protestants (one German and two Turkish Christian converts) were brutally murdered by five young extremists in Malatya in 2007. On 19 November 2019 Korean (South) missionary Jin-Wook Kim (41) was murdered by a 16-year-old in Diyarbakir in south-east Türkiye. The motive behind the murder was portrayed as robbery, but in a press notice from the Human Rights Centre of the Diyarbakir Bar Association it was noted that allegations had been made that Mr. Kim’s murder was due to missionary activities. One month prior to his murder, a poster campaign in Diyarbakir by the Anatolian Youth Association and the Nationalist Youth Foundation had targeted Jews and Christians.

27. Hate Crimes against Christians: In 2024, Inanc Ozgurlugu Girişimi (Freedom of Belief Initiative) together with the Norwegian Helsinki Committee reported⁹ the known occurrence of 47 hate crimes in 2023 related to religion or belief. They reported an increase in violent attacks related to religion or belief compared with previous years. Twenty-two of these hate crimes were against Christians, who were the most targeted community. The report noted an increase in hate crimes against Protestants in 2023. The report noted that given obstacles to gathering data, it is to be considered that the report does not capture the actual extent of these crimes.

28. Crimes and threats concerning religious sites: In 2023 the United States Commission on International Religious Freedom published its ‘Examination of Threats to Religious Sites in Turkey’¹⁰. The document refers to a media survey that covered the years 2003–2022 which “enumerated attacks and threats reported in select media outlets on places of worship, religious sites and institutions, religious schools, and cemeteries.”¹¹ The survey showed that in those years Protestants suffered the second highest number of such attacks (112 cases); with the number of attacks against them being disproportionately higher than the community that suffered the most attacks -122 cases concerning Alevis- given the difference in the communities’ respective populations in Türkiye. As to the likelihood of true figures being higher, the report outlines: “It is important to note that certain factors may prevent religious communities from reporting crimes, and that some groups are more likely to report attacks than others.”¹²

Expatriate Protestant Christians forced to leave, precluded from re-entry to Türkiye (violations of articles 12, 13, 14, 17, 18, 23 and 26 ICCPR)

29. Over the course of the time since January 2019, about 115 expatriate Protestant Christians in Türkiye have been designated as security threats and have resultingly been denied residency or have had their residency permits cancelled, and in effect are precluded from re-entering Türkiye. None of them was convicted of any crime and they were living and working in Türkiye legally and peaceably, in some cases for decades.

30. The impact is much wider when family members are taken into consideration. Several of those targeted are married to Turkish citizens, with children, compelling even Turkish citizens to emigrate to keep their families together. In some cases families are living apart, with family members remaining in Türkiye separated from those forced to live in another country.

31. Those targeted have been designated security threats by the Interior Ministry and issued either G-87 or N-82 immigration restriction codes by the Directorate-General for Migration Management. No specific reasons for the security designation decisions and residency decisions have been provided, but it is known that confidential reports from Turkish intelligence underpin the issuance of the codes.

32. The only common feature amongst these foreigners targeted is the peaceful exercise of their Protestant Christian faith. Those targeted and their lawyers have had limited access to the intelligence reports, even during court proceedings, but court decisions indicate that they relate either to attendance at Protestant Christian conferences or alleged missionary activity.

33. *Decisions are thus not merely immigration matters but involve clear violations of human rights, including the right to freedom of religion or belief and rights pertaining to family, and the home.*

34. The security designation codes underpin decisions as to the cancellation of residency permits and the refusal of residency applications. They also operate as *de facto* bans from re-entry to Türkiye: recipients of the codes are required to apply for a visa to enter the country but in practice applications from those who are the subject of the codes are invariably refused.

35. In most cases the appeals of those designated security threats have been denied in the Turkish courts. After exhausting avenues of appeal in Türkiye a number of those targeted have been making applications to the European Court of Human Rights ('ECtHR').

36. In June 2024, the Constitutional Court ruled on the coding and expulsion of nine expatriate Protestants, declaring that their freedom of religion had not been violated¹³. Although the nine Protestants had legally obtained residency permits, their alleged missionary activities prompted Türkiye's Directorate of Immigration Management to apply N-82 codes against the Christians, leading to their residency being revoked, a deportation order issued against them and an effective entry ban put in place. These nine people have now applied to the ECtHR to appeal this decision.

37. The targeting of foreign Christians as detailed above makes it difficult for local Protestant churches to function. It heightens the existential threat to churches caused by other forms of violations, such as relate to the training of clergy (see above). The 2023 Human Rights Violation Report of the Association of Protestant Churches (Protestan Kiliseler Derneği), as published in 2024, concludes that: "since 2019 the severe restrictions on foreign religious workers by requiring them to leave the country either due to the issuance of N-82 or G-87 codes banning entry into Turkey or the denial of residence visas, has caused severe difficulties for Protestant fellowships that relied on a foreign pastor for spiritual guidance."^{14, 15}

38. More details on these issues and on specific cases of people targeted are linked below.¹⁶

Exclusion of Protestant representatives from official functions related to the Christian community; deficient communication from Turkish authorities; and disproportionate effects on Protestant and other Christians of Covid-19 restrictions (violations of articles 18 and 26 ICCPR)

39. The Turkish government organises meetings with representatives of faith communities recognised under the Lausanne Treaty of 1923, but representatives from the Protestant community are typically excluded from such meetings or other state functions that include religious leaders of minority communities. The Protestant community is therefore marginalised.

40. The unwillingness of the Turkish government to communicate with representatives of the Protestant community adversely affects the Protestant community by denying official recognition and channels to discuss and resolve issues. Lack of legal status also weakens the ability of Protestant communities to resolve issues. The adverse effects of these matters were, for example, felt acutely by Protestant communities at the time of the Covid-19 pandemic. They were effectively barred from means of dialogue and redress surrounding restrictions on meeting that applied to associations and surrounding restrictions on travel and meeting that prevailed at weekends that thus disproportionately affected Protestant and other Christian communities compared with other religious communities. The main day of Christian collective worship is Sunday (the equivalent for Muslims is Friday).

Threat of terrorism

41. Türkiye's efforts to thwart the activities of the self-declared Islamic State of Iraq and Syria ('ISIS')¹⁷ and in doing so tackling the risks of attacks against religious minorities, including Christians, and against minorities' places of worship, etc., are duly recognised. In January 2024, ISIS gunmen murdered a man from an Alevi background at a Roman Catholic church in Istanbul. In recent years, membership has expanded amongst ISIS branches in Türkiye. The expansion is largely due to the joining of foreign-born and transnational jihadists.¹⁸

Issues experienced by international protection claimants

42. A 2023 report by Middle East Concern, Open Doors, Article18 and CSW documents 'The Plight of Iranian Christians Claiming International Protection in Türkiye'.¹⁹ It includes details of discrimination experienced by this community in Türkiye, such as in matters of employment and the rental of accommodation. It also details the issues of the rejection of valid claims made by members of this community for international protection and the issuance of deportation orders following on: the situation on these two fronts is noticeably different- for the worse- since the Turkish authorities began assessing claims in 2018 instead of the UN Refugee Agency- UNHCR.

Further

43. For more information on the violations outlined in the instant report, as well as others faced by Protestants and other Christians, please see the 2021 report of Middle East Concern, the World Evangelical Alliance, the European Evangelical Alliance, and the Association of Protestant Churches (Protestan Kiliseler Derneği) to the Human Rights Committee (132nd session).²⁰ The annual reports of the latter named organisation are also valuable sources as to these issues.²¹ As is the extensive report of Middle East Concern and International Christian Concern entitled 'Turkey: Challenges facing Christians 2016 – 2020'.²²

RECOMMENDATIONS

44. Middle East Concern, Open Doors, the Association of Protestant Churches (Protestan Kiliseler Derneği) and the Brazilian Institute of Law and Religion (IBDR) appeal for rights violations against Christians in Türkiye to be raised with Türkiye and for the following recommendations to be made. For Türkiye to:

- Respect and protect the rights enshrined in the ICCPR, including the right to freedom of religion or belief for everyone, inclusive of Christians including Protestants;
- Withdraw the reservation to Article 27 ICCPR, in order to ensure that all persons belonging to ethnic, religious or linguistic minorities are effectively protected against any form of discrimination, and can fully enjoy their rights under the ICCPR;
- Ensure Christians and other minority religious groups are allowed to register and obtain legal personality;
- Ensure there are legal ways for church congregations to use existing church buildings owned by municipalities, the Ministry of Culture, or other public institutions;
- Work to draft and implement legislation allowing, or otherwise permit non-Muslim faith communities to train their religious instructors in-country without restrictions and in accordance with their own beliefs and traditions;
- Enable Christian clergy of the various denominations to receive appropriate training in accordance with their distinctive doctrines;
- Ensure measures are taken to address intolerance and prejudice and prohibit hate speech in the various forms of media; as well as to prevent hate speech and hate crimes in society;
- Ensure measures are taken to fulfil the government's obligations under Article 18 ICCPR in the sphere of education: specifically in regard to the school curriculum and textbooks to promote respect and tolerance for other faith and non-faith groups, as well as on non-Muslims' rights for exemption from religion classes.
- Reverse discriminatory decisions to effectively expel and ban expatriate Protestant church members from Türkiye in violation of their rights under the ICCPR;
- Ensure due legal process and fair procedure in appeals against these decisions and permit appellants and their legal representatives to have access to files submitted by Turkish intelligence concerning them and used as the basis for the decisions against them;
- Ensure the Turkish immigration authorities provide clarity on the procedure and process for international protection claims; provide a (reasonable) timeline within which claims will be processed; and undertake to evaluate with and illustrate due diligence in assessing these claims, including those of Iranian Christians in Türkiye.

¹ According to the government this figure as to the Muslim population includes Alevis;

² Association of Protestant Churches, 2023 Human Rights Violation Report (published 2024)

³ <https://d3lwycy8zkggea.cloudfront.net/1717508601/2023-human-rights-violation-report.pdf>

⁴ https://www.constituteproject.org/constitution/Turkey_2017

⁵ https://upr-info.org/sites/default/files/documents/2021-07/letter_for_implementation_3rd_upr_tur_e.pdf

⁶ <https://daccess-ods.un.org/access.nsf/Get?OpenAgent&DS=A/HRC/44/14&Lang=E>

⁷ See <https://www.state.gov/reports/2023-report-on-international-religious-freedom/turkey/>

⁸ <https://siviltoplum.gov.tr/ankara/cok-onemli-duyuru-5253-sayili-dernekler-kanununda-bazi-degisiklikler-yapildi>

⁹ For example: <https://www.yenisafak.com/gundem/sosyal-medyada-yeniden-buyuyen-tehlike-misyonerlik-3595372>

¹⁰ <https://inancozgurlugugirisimi.org/turkiyede-din-inanc-veya-inancsizlik-temelli-nefret-suclari-2023-raporu-yayimlandi/>

<https://inancozgurlugugirisimi.org/wp-content/uploads/2024/07/IOG-Nefret-Sucu-Rapor2023-TR-Full.pdf>

¹¹ <https://www.uscirf.gov/sites/default/files/2023-11/2023%20USCIRF%20Examination%20of%20Threats%20to%20Religious%20Sites%20in%20Turkey.pdf>

¹¹ *Ibid* at page 8.

¹² *Ibid*

¹³ <https://www.aydinlik.com.tr/haber/misyonerlerin-sinir-disi-kararina-aym-onayi-sinirdisi-edilen-misyonerler-kim-kac-kisi-sinir-disi-edildi-9-kisi-neden-sinirdisi-edildi-477586>

¹⁴ Association of Protestant Churches, 2023 Human Rights Violation Report (published 2024)

<https://d3lwycy8zkggea.cloudfront.net/1717508601/2023-human-rights-violation-report.pdf> at pages 2-3.

¹⁵ Association of Protestant Churches, 2020 Human Rights Violation Report (published 2021) similarly concluded: the “frequent cases in which foreign clergy and church members were deported, denied entry into Turkey, refused residence permits, or denied entry visas” have left many churches “in exceedingly difficult situations”.

<http://www.protestankiliseler.org/wp-content/uploads/2021/02/2020-Human-Rights-Violation-Report-.pdf> at page 7

¹⁶ See for example: <https://www.thetimes.co.uk/article/turkeys-protestants-under-threat-as-danger-to-security-lzknj5cf6> ; and <https://www.dw.com/en/protestant-pastors-fear-deportation-from-turkey/a-53967865> ; and

<https://www.worldwatchmonitor.org/2020/07/turkey-orders-deportation-of-turkish-pastors-wife-in-string-of-expulsions/>

¹⁷ See, for example: <https://www.al-monitor.com/originals/2024/04/turkey-expands-isis-crackdown-detains-over-100-week>

¹⁸ https://www.uscirf.gov/sites/default/files/2024-07/2024%20Turkey%20Country%20Update_0.pdf

¹⁹ <https://articleeighteen.com/reports/13404/>

²⁰ <https://un.worldia.org/turkey-freedom-of-religion-or-belief-submission-to-the-human-rights-committee-132nd-session/>

²¹ For example, Association of Protestant Churches, 2023 Human Rights Violation Report (published 2024)

<https://d3lwycy8zkggea.cloudfront.net/1717508601/2023-human-rights-violation-report.pdf> ; and

Association of Protestant Churches, 2020 Human Rights Violation Report (published 2021)

<http://www.protestankiliseler.org/wp-content/uploads/2021/02/2020-Human-Rights-Violation-Report-.pdf>

²² <https://www.persecution.org/wp-content/uploads/2020/12/Turkey-Report-Final-Draft-1.0.pdf>