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ANNEX

to the Commission Implementing Decision
on the financing of the multiannual individual measure supporting essential needs for refugees and migration management in Türkiye for 2025-2027

Action Document for the multiannual individual measure supporting essential needs for refugees and migration management in Türkiye for 2025-2027

1. SYNOPSIS

1.1 Action Summary Table

<p>Title OPSYS Basic Act</p>	<p>Multiannual individual measure supporting essential needs for refugees and migration management in Türkiye for 2025-2027</p> <p>Commission Implementing Decision on the financing of the multiannual individual measure supporting essential needs for refugees and migration management in Türkiye for 2025-2027</p> <p>OPSYS business reference:</p> <p><i>AoS 1 – The Social Safety Net with Education: ACT-63418 and ACT-63363</i></p> <p><i>AoS 2 – Supporting migrant health services in Türkiye: ACT-63417 and ACT-63384</i></p> <p><i>AoS 3 – Enhancing inclusive quality education support for refugees in Türkiye: ACT-63362</i></p> <p><i>AoS 4 – Strengthening of Türkiye’s eastern, southern and south-eastern borders: ACT-63393</i></p> <p><i>AoS 5 – Enhancing protection response for sustainable voluntary returns to Syria: ACT-63385</i></p> <p>Commitment level 1 number:</p>
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	<p>For 2025: JAG.SUM.2148191. JAG.SUM.2074850 For 2026: JAG.SUM.2074364, JAG.SUM.2149890, For 2027: JAG.SUM.2074367, JAG.SUM.2149928</p> <p>Financed under the Instrument for Pre-Accession Assistance (IPA III) and the Neighbourhood, Development and International Cooperation Instrument – Global Europe (NDICI-GE).</p>
Beneficiary of the action	<p>The action shall be carried out in the Republic of Türkiye.</p> <p>Due to the regional nature, a part of this action “Area of Support 5” (AoS 5) fostering regional cooperation, and the importance to ensure extended regional coverage, the eligibility of the action (AoS 5) extends exceptionally to the Syrian Arab Republic. Its participation constitutes a substantial element to ensure the coherence and effectiveness of Union financing and to foster regional cooperation.</p>
Programming document	N/A
Link with relevant strategic programming documents	N/A
BUDGET INFORMATION	
Amounts concerned	<p>Total estimated cost: EUR 1 151 000 000.00</p> <p>Total amount of EU budget contribution EUR 1 151 000 000.00 out of which EUR 570 000 000.00 in 2025, EUR 378 000 000.00 in 2026, and EUR 203 000 000.00 in 2027</p> <p>Budget line(s) (article, item): Budget line 15.020101.03 - Support to migrants and host communities</p> <ul style="list-style-type: none"> - For 2025: EUR 140 000 000.00; - For 2026: EUR 300 000 000.00; - For 2027: EUR 200 000 000.00 <p>Budget line: 14.020320 - NDICI_21_27 - Neighbourhood, Development and International Cooperation Instrument (NDICI)</p> <ul style="list-style-type: none"> - For 2025: EUR 430 000 000.00; - For 2026: EUR 78 000 000.00; - For 2027: EUR 3 000 000.00

	The contribution from the general budget of the European Union is subject to the availability of appropriations for the respective financial years following the adoption of the relevant annual budget, or as provided for in the system of provisional twelfths.
MANAGEMENT AND IMPLEMENTATION	
Implementation modalities (management mode and delivery methods)	<p>Direct management through:</p> <ul style="list-style-type: none"> - Grants <p>Indirect management with:</p> <ul style="list-style-type: none"> - the International Centre for Migration Policy Development (ICMPD). - the United Nations High Commissioner for Refugees (UNHCR).
Final date for concluding / legal commitments	<p>At the latest by 31 December 2026 for year 2025 allocation</p> <p>At the latest by 31 December 2027 for year 2026 allocation</p> <p>At the latest by 31 December 2028 for year 2027 allocation</p> <p style="text-align: center;">-----</p>

1.2. Summary of the Action

This action builds on key interventions initially launched under the Facility for Refugees in Turkey ('the Facility') and further extended through EU refugee support between 2021 and 2024. It reflects the EU's sustained commitment to addressing the evolving needs of refugees¹ and host communities in Türkiye by improving access to essential services, fostering social cohesion and consolidating institutional capacity.

Reflecting a comprehensive, multi-sectoral approach, the action is structured around five interrelated 'Areas of Support': **(1) basic needs, education and child protection; (2) health; (3) education system integration; (4) border management; and (5) voluntary return.**

Together, these pillars aim to ensure the continuity of effective assistance to refugees and host communities while increasing Türkiye's capacity to manage migration and provide inclusive, rights-based services in line with international standards.

Area of Support (AoS) 1 – The Social Safety Net with education integrates two key components – basic needs and education/child protection – through the continued implementation of the *Social Safety Net (SSN)* and *Conditional Cash Transfer for Education (CCTE)* programmes. It ensures that vulnerable refugees receive

¹ Through this Action Document, 'refugee', 'migrant' and 'asylum seeker' are used interchangeably and regardless of the people's registration status in Türkiye. A specificity of the Turkish asylum system is linked to the fact that the country has signed the 1967 New York Protocol of the 1951 Geneva Convention with a reservation. Accordingly, the vast majority of refugees in Türkiye cannot apply for fully-fledged refugee status but for "conditional refugee" status only, which, if granted, limits the stay in the country until the moment a recognised refugee is "resettled to a third country".

direct cash assistance to cover essential needs while improving school attendance and strengthening access to education and social services. Overall, the action reflects the EU's long-term commitment to promoting resilience, inclusion and dignity for refugees. The first outcome focuses on meeting basic needs by providing monthly cash assistance to help vulnerable refugees in Türkiye live in dignity, reduce poverty, and access protection and employability services. The second outcome targets refugee children's access to quality education, particularly addressing lower enrolment and attendance rates compared to Turkish peers. Through the CCTE programme, refugee children receive conditional cash support linked to school attendance, coupled with child protection referrals. These efforts contribute to the Sustainable Development Goals on poverty reduction, zero hunger, reduced inequalities, and quality education, while supporting the long-term goal of improving living standards and social cohesion.

Area of Support 2 – Supporting migrant health services in Türkiye is aimed at improving the health and well-being of refugees in Türkiye, by supporting the delivery of quality healthcare services and increasing the Turkish Ministry of Health's institutional capacity. Building on the SIHHAT I, II and III programmes (programmes to provide healthcare to Syrians under temporary protection), the action focuses mainly on strengthening primary health services with a specific focus on reproductive health, mental health, psychosocial support and health literacy.

Area of Support 3 – Enhancing inclusive quality education support for refugees in Türkiye aims to ensure that refugee children are successfully integrated into Türkiye's national education system from pre-primary to secondary level, in provinces with high-refugee-concentration. It also aims to sustain the quality of education for host community students.

Area of Support 4 – Strengthening of Türkiye's eastern, southern and south-eastern borders builds on previously EU-funded efforts and aims to reduce irregular migration levels and enhance the protection of migrants by strengthening the capacity of the Turkish authorities to manage the country's land borders with modern surveillance equipment. It will provide border control equipment, aligned with confirmed needs on the eastern and south-eastern borders (with Iran, Iraq and Syria), to expand ongoing EU-funded support. Additionally, it should strengthen the technical capacity and coordination mechanisms at selected border crossing points along the southern borders of Türkiye.

Area of Support 5 – Enhancing protection response for sustainable voluntary returns to Syria builds on a previously EU-funded intervention on facilitating voluntary, safe, dignified and sustainable returns to Syria. It is aimed at strengthening the protection response for sustainable voluntary returns to Syria by enhancing the consistency and efficiency of voluntary return procedures in Türkiye in compliance with international law and standards², while providing essential support to returnees in Syria. This area of support has three key objectives with complementary activities benefiting Syrian refugees in both the host and origin countries: (i) strengthening voluntary return policy and implementation in Türkiye (ii) enhancing mechanisms for monitoring voluntary returns and access to protection, (iii) enhancing the sustainability of voluntary returns by addressing barriers and challenges in Syria.

² Notably the principle of non-refoulement which guarantees that no one should be returned to a country where they would face torture, cruel, inhuman or degrading treatment or punishment and other irreparable harm. This principle is applicable to all at all times regardless of status including migration status.

1.3. Beneficiaries of the action

The action shall be carried out in the Republic of Türkiye.

Due to the regional nature, a part of this action “Area of Support 5” (AoS 5) fostering regional cooperation, and the importance to ensure extended regional coverage, the eligibility of the action (AoS 5) extends exceptionally to the Syrian Arab Republic. Its participation constitutes a substantial element to ensure the coherence and effectiveness of Union financing and to foster regional cooperation.

2. PURPOSE OF THE ACTION (WHY)

2.1. Overall rationale

This action is twofold: on the one hand (AoS 1-3) it is grounded in the evolving humanitarian and development needs of Türkiye, which continues to host the largest refugee population in the world, including over 2.5 million registered Syrian refugees. On the other hand (AoS 4 and 5), it is based on the EU’s strategic objectives and priorities in the areas of migration and forced displacement, security, and cooperation with neighbouring countries. The EU-Türkiye High-Level Dialogue on Migration and Security, held on 2 July 2025 in Istanbul highlighted the importance of strengthened cooperation between the EU and Türkiye to addressing common challenges in migration and security.

Despite Türkiye’s sustained political and institutional commitment to refugee protection and integration, the country faces ongoing socio-economic challenges – including high inflation, currency depreciation, and the lingering impacts of the February 2023 earthquakes – which have increased refugees’ dependence on social assistance and strained public systems. In response, the EU has maintained a long-standing strategic partnership with Türkiye, mobilising over EUR 11.5 billion since 2011 under the Facility for Refugees in Turkey and subsequent allocations, with the aim of stabilising the region, ensuring social cohesion, and protecting the most vulnerable.

Overall, the proposed action will provide added value to the EU’s cooperation with Türkiye, supporting the country’s efforts in migration management, while also promoting the EU’s strategic objectives and priorities in the region. The proposed areas of support tie together the needs of the partner countries, the EU’s strategic objectives, and the EU’s added value. The action will contribute to the implementation of the EU’s Enlargement Policy and the Commission’s communicated policy priorities, while promoting the EU’s interests and values in the region.

Area of Support 1 – Social Safety Net with education promotes a coherent, integrated, and sustainable approach by merging two flagship EU-funded programmes - the SSN and the CCTE - into a unified framework that strengthens national systems while directly responding to the socio-economic vulnerabilities of refugees. It supports key EU policy priorities including the European Pillar of Social Rights, the 2030 Agenda for Sustainable Development (notably Sustainable Development Goals 1, 2, 4 and 10), and the EU’s Global Gateway Strategy, by promoting inclusive service delivery, social protection, and long-term resilience. The action also complements other EU-funded initiatives across education, protection, and health, including

PIKTES+ (Promoting the integration of Syrian children into the Turkish education system), SIHHAT III, and ECHO-funded interventions in earthquake-affected provinces, creating important synergies across instruments. It leverages Türkiye's robust institutional capacity and benefits from close collaboration with local and international partners, including UN agencies, NGOs, and Team Europe actors. This strategic engagement not only supports refugees' immediate well-being but also consolidates EU-Türkiye cooperation on migration management and long-term development objectives in line with mutual commitments under the EU-Türkiye Statement and European Council conclusions.

Area of Support 2 – Supporting migrant health services in Türkiye. Health needs among refugees remain high and are compounded by social determinants such as poverty, crowded households, early marriage, and low levels of education. In response, the EU has supported a comprehensive approach to healthcare, including immunisation, reproductive health services, mental health and psychosocial support, laboratory diagnostics, cancer screenings, and some specialised care. These services are mainly delivered through migrant health centres (MHCs) and supported by measures to improve health literacy via mobile services, outreach activities, and training for healthcare personnel. Implemented in partnership with the Turkish Ministry of Health (MoH), SIHHAT I, II and III and additional support (a combined budget of EUR 770 million) have provided free, equitable and quality healthcare services to refugees across the Türkiye. SIHHAT has also contributed to integrating refugee health records into national systems and strengthening the MoH's capacity for data-driven policy development in the field of migrant health.

Under **Area of Support 3 – Enhancing inclusive quality education support for refugees in Türkiye**, Türkiye maintains its commitment to the integration of refugee children into the free and compulsory formal education system, spanning 12 years (from ages 6 to 17), including pre-primary education starting at age 5. According to Ministry of National Education data, as of December 2024, 938 610 refugee children, including pre-schoolers aged 5, were enrolled in formal education, achieving an 80.6% enrolment rate. Specifically, 836 805 Syrian refugee children were enrolled in schools with a 75.65% enrolment rate. This compares to only 30% ten years before. Enrolment rates, however, vary by age and gender. In addition, 225 852 registered refugee children do not participate in education. Since 2017, the EU has allocated a total of EUR 2.38 billion to refugee education in Türkiye, including infrastructure and cash assistance. The education strategy supports the integration of Syrian and other refugees into formal education, addressing barriers to participation and maintaining the quality of learning for host community students. The strategy extends to all levels, from early childhood and pre-primary to higher education.

Area of Support 4 – Strengthening of Türkiye's eastern, southern and south-eastern borders is grounded in the country's evolving migration landscape and its strategic importance as a key transit country for irregular migration flows to the EU. The high-level dialogue on migration and security held on 2 July 2025 between the EU and Türkiye has underscored the mutual interest in addressing migration challenges and enhancing cooperation on border management. The EU's strategic objectives for migration and security are aligned with Türkiye's priorities, as reflected in the EU-Turkey Statement of 2016 and the EU's commitment to supporting the country's migration management efforts. The proposed action will contribute to the EU's goals of reducing irregular migration at Türkiye's external borders – and consequently towards the EU – enhancing overall border security, and promoting sustainable returns. The action is complementary to other EU support initiatives, funded both by the IPA and the Neighbourhood, Development and International Cooperation Instrument (NDICI-GE).

The proposed cooperation priorities and areas of support are also aligned with the EU’s Enlargement Policy and the Commission’s communicated policy priorities, as outlined in the Pact on Migration and Asylum. The proposed action will build on the existing cooperation between the EU and Türkiye, including the EU-Turkey Joint Action Plan of 2015. In terms of added value, the proposed action will bring together the EU’s expertise and resources to support Türkiye’s border management efforts, while saving lives and promoting international human rights standards and best practices. The action will also contribute to the EU’s strategic objectives in the region, including the promotion of stability, security, and prosperity.

Area of Support 5 – Enhancing protection response for sustainable voluntary returns to Syria is grounded in the EU’s strategic objectives and priorities, particularly in the areas of migration, addressing forced displacement, and cooperation with neighbouring countries. More specifically, this area of support is closely aligned with Council Conclusions on Syria of 23 June 2025, which take note of the statements by UNHCR that conditions in Syria currently do not allow for large-scale voluntary repatriations to Syria, while stipulating the commitment of the EU on ‘helping to create the conditions for safe, informed, dignified, voluntary and sustainable returns to Syria and readiness to support those who voluntarily wish to return’. The Conclusions reiterate EU’s commitment to strengthening protection monitoring, follow-up, support and services for displaced persons or new returnees in Syria - notably with UNHCR³ in coordination with DG ECHO. The area of support also complements the EU’s existing support to Türkiye, including the EU-Turkey Statement of March 2016, the EU-Turkey Joint Action Plan of October 2015, and the ongoing cooperation on border management, migration and asylum. Furthermore, the AoS complements other EU’s actions implemented in Syria and the region in support of durable solutions to the protracted displacement, including voluntary, safe and dignified returns to Syria. Synergies and complementarity will be sought with ongoing and relevant future interventions.⁴ Support to refugees returning to Syria under this project will be aligned to assistance provided to returnees from other host countries and IDPs as much as possible.

2.2. Context and problem analysis

Türkiye has demonstrated consistent political commitment and institutional capacity to integrate refugees into national systems, offering access to social assistance, education, and healthcare. However, the socio-economic context still faces many difficulties.

Area of Support 1 – Social Safety Net with education

Between 2022 and 2025, Türkiye experienced severe inflation (a 269% increase in the consumer price index) and a significant depreciation of the Turkish lira, severely reducing purchasing power and amplifying economic vulnerability across both refugee and host populations. The fall of the Assad regime in December 2024 prompted some returns to Syria. While as per July 2025 over 400 000 persons had returned to Syria, there are still 2.5 million Syrians in Türkiye, highlighting the need for continued, substantial support within Türkiye. In this context, access to basic needs and education remain critical challenges. Refugees increasingly rely on coping strategies such as taking on debt, reducing food intake, or withdrawing children from school to contribute to

³ <https://data.consilium.europa.eu/doc/document/ST-10688-2025-INIT/en/pdf> para 17.

⁴ PC 69089 – “EU Support for Safe Returns and a Stable Future for Syrian Refugees”, implemented by UNHCR, IOM and ILO in Lebanon and in Syria.

household income. Vulnerable groups - especially children - face heightened risks of school dropout, child labour, early marriage, and social exclusion, hence socio-economic vulnerabilities become more and more the source for protection concerns. Despite the Turkish government's strong institutional framework, led by the Ministry of Family and Social Services (MoFSS), the Ministry of National Education (MoNE), and the Turkish Red Crescent (TRC), pressures on public services persist. These institutions have substantial experience implementing EU-funded social and education programmes but require continued support to enhance their financial and operational capacities, improve data coordination, and expand protection services. This action seeks to address these challenges by integrating basic needs and CCTE interventions under one framework, strengthening national systems and service delivery through targeted capacity building, and addressing structural vulnerabilities among refugees and host communities.

Area of Support 2 – Supporting migrant health services in Türkiye

Despite significant support provided under the SIHHAT projects, refugees in Türkiye – particularly non-Syrians – continue to face several health-related challenges. Limited access to healthcare, especially for those frequently moving between provinces, remains a key issue. Language barriers, especially for non-Arabic speakers, further restrict effective communication with healthcare providers. In addition, low health literacy, insufficient awareness of available services and rights, and the persistence of poverty, early marriage, and low education levels compound the difficulties refugees face in accessing adequate care. While Türkiye follows a non-discriminatory policy, granting refugees the same access to the national immunisation programme as Turkish citizens, systemic barriers persist. SIHHAT has focused on addressing these needs through the expansion of primary healthcare services, with particular attention to mother and child health, immunisation, reproductive health and mental health. Migrant health centres and the employment of Syrian healthcare personnel have proven to be vital assets in improving service outreach and acceptance within refugee communities. Support under SIHHAT I and II significantly enhanced the Ministry of Health's capacity, particularly in the area of immunisation, reproductive health and mental health. Growing needs, however, and regional disparities, especially in the aftermath of the February 2023 earthquakes, mean there is a need for further reinforcement and coordination.

Area of Support 3 – Enhancing inclusive quality education support for refugees in Türkiye

Despite Türkiye's commendable efforts and significant EU support in integrating refugee children into its national education system, several persistent and emerging challenges continue to hinder access to, participation in, and quality of education for refugee populations. Economic vulnerability remains one of the most pressing barriers to access education. Refugee households often face severe financial hardship, leading to negative coping mechanisms such as child labour or deprioritising education, especially for girls and adolescents. The February 2023 earthquakes had a devastating impact on provinces with high refugee populations, disrupting access to and retention (ongoing participation) in education, and aggravating already fragile living conditions. While initiatives such as Turkish language education have led to measurable improvements in learning outcomes, significant challenges in the quality of education for refugees persist, particularly in the areas of language proficiency, classroom management, and school safety. In addition, the high number of refugee students also puts school resources under strain and impacts social cohesion. Finally, despite efforts to promote integration, social cohesion remains a concern. Increased interaction between host community members and immigrants is

imperative. These challenges call for targeted and sustained interventions to ensure that education remains both a right and a lever for long-term integration and stability.

Area of Support 4 – Strengthening of Türkiye’s eastern, southern and south-eastern borders

Türkiye remains an important transit country and country of origin for irregular arrivals into the EU, notwithstanding significant efforts made by the Turkish authorities to manage and control its borders effectively. Despite a decrease in irregular migrant apprehensions in 2025, pressures continue along its eastern, southern and south-eastern borders.

The EU-Turkey Statement⁵ of 18 March 2016 remains the main framework of cooperation. The EU Action Plan for the eastern Mediterranean route⁶ and the Joint Communication by the High Representative/Vice-President and the European Commission to the European Council⁷, underline the importance of enhancing management of migration flows, countering migrant smuggling and strengthening cooperation with EU agencies, namely Frontex and Europol. The action plan for the Eastern Mediterranean route also reiterated “*that all border management activities must be implemented in full respect of Union and international law, particularly the fundamental rights obligations provided for therein, and that national authorities are expected to ensure such respect*”. By adopting a comprehensive 12th National Development Plan and the Strategic Plan of the Ministry of Interior, Türkiye has underlined its priorities for improving border security infrastructure, improving visa and residence application processes, and strengthening institutional capacity.

Continued EU and national investments are needed to fill existing gaps, focused on completing the surveillance, communication and lighting infrastructure along the eastern, southern and south-eastern borders. These efforts are essential for managing irregular migration, countering migrant smuggling, and improving security at border crossing points along what are considered to be the country’s riskiest land border segments in terms of irregular migration flows, smuggling activities and other cross-border crime.

Area of Support 5 – Enhancing protection response for sustainable voluntary returns to Syria

Following the fall of the Assad regime in Syria in December 2024, many Syrian refugees in Türkiye as well as in the wider region expressed elation and hope about the prospect of returning to their homes, although they also expressed caution. While Türkiye continues to host the largest Syrian refugee population in the region and beyond, self-organised voluntary returns to Syria have shown an upward trend. Between December 2024 and November 2025, more than 550 000 Syrian refugees voluntarily went back to Syria⁸. Depending on how the situation within Syria develops, the number of refugees deciding to go back may increase in the future. However, based on the latest UNHCR’s Enhanced Regional Survey on Syrian Refugees’ Perceptions and Intentions on

⁵ [EU-Turkey statement, 18 March 2016 - Consilium](#)

⁶ https://home-affairs.ec.europa.eu/news/eu-action-plan-eastern-mediterranean-migration-2023-10-18_en

⁷ https://enlargement.ec.europa.eu/joint-communication-european-council-state-play-eu-turkiye-political-economic-and-trade-relations-0_en

⁸ Turkish MoI Statistics of 29 August 2025.

Return to Syria⁹, conducted in Egypt, Iraq, Jordan, Lebanon, the intention to return within the next 12 months has decreased from 27% to 18%, with safety and stability remaining a key concern, as well as housing availability and property damage, limited employment opportunities, lack of financial resources to support the journey, and inadequate access to basic services.

The effective management of migratory flows – including facilitating voluntary returns – is a top priority for Türkiye and the EU. The 12th National Development Plan and the Strategic Plan of the Presidency of Migration Management (2024-2028) highlight that voluntary, safe, informed, dignified and sustainable return mechanisms will be expanded and implemented effectively and identify voluntary return and resettlement to a third country as essential components for achieving durable solutions for foreigners in Türkiye under international or temporary protection.

Türkiye's legal framework, including the Law on Foreigners and International Protection, governs the voluntary return process. The UNHCR continues to monitor voluntary returns of refugees to Syria and maintains its formal determination that conditions in support of organised returns have not been met. Türkiye needs to further strengthen its voluntary returns mechanism fully in line with international law, equipped with safeguards, in particular access to legal aid and counselling. According to findings from surveys in Syria, the damage or destruction of property, HLP, security concerns, lack of employment/livelihoods and lack of essential services are key barriers to return and reintegration. This underscores the relevance and necessity of interventions promoting the economic empowerment of households as well as refurbishment of houses, in addition to transport and legal assistance. This action aims to address barriers to returns, with a view to providing protection assistance where necessary and contributing to sustainable reintegration. Support to refugees returning to Syria under this project will be aligned to assistance provided to returnees from other host countries and IDPs as much as possible.

2.3. Lessons learned

Previous EU support in Türkiye for basic needs, social protection, education, health, and migration management has demonstrated that a sustainable impact is achieved when EU policy objectives are closely aligned with national strategies and institutions are adequately supported.

On **basic needs and social protection**, extensive experience gained through the SSN, the Emergency Social Safety Net (ESSN) and CCTE programmes has underlined the importance of robust targeting mechanisms focusing on severity of the vulnerabilities within Households (HHs) or with individuals, early coordination in programme transitions, and a strong operational link between social assistance and child protection. Notably, integrating education-linked cash transfers with protection referrals and introducing real-time monitoring systems have improved both school attendance and case management. However, legal and operational challenges remain, particularly concerning data sharing under Türkiye's personal data protection framework and the need for more flexible funding methods to adapt to evolving vulnerabilities.

⁹ UNHCR, Enhanced Regional Survey on Syrian Refugees' Perceptions and Intentions on Return to Syria (Egypt, Iraq, Jordan, Lebanon) - September 2025

In the **health** sector, the multi-phase SIHHAT programme has shown that large-scale service delivery for refugees can be successfully integrated into national systems. Key achievements include the establishment of migrant health centres, the deployment of bilingual health personnel, and improved access to mental and reproductive health services. Lessons from implementation, audits, and evaluations highlight the importance of health literacy initiatives, interoperable digital health records, and flexible service delivery models to accommodate mobile and hard-to-reach populations. Additionally, there is a need to strengthen the Ministry of Health's strategic planning and data capacities to ensure evidence-based decision-making in migrant health policy.

In **education**, the EU-funded PIKTES programme and its predecessors have helped improve enrolment, retention, and completion rates for refugee children, while increasing the national education system's capacity to accommodate a large non-native student population. Significant advances have been made in areas such as Turkish language instruction, psychosocial support, and teacher training. Yet gaps persist in early childhood education, support for children with disabilities, and integration of protection services in schools. Lessons also point to the need for greater access to disaggregated data to inform programming and track equity outcomes, and for better alignment between teacher professional development and the realities of diverse, multilingual classrooms.

For **border management**, approximately EUR 393 million under IPA 2014, 2015, 2016, 2019 AAPs, EU Support to Refugees IPA 2022/23 and NDICI-GE 2024 has been allocated to flagship projects that will improve Türkiye's border management along its western, eastern and south-eastern borders through construction of electro-optical communication and surveillance masts as well as smart lighting systems and the installation of thermal cameras. Some of the equipment and systems procured such as the mobile electro-optical (thermal) cameras and stationary communication and surveillance mast systems are already in use. User feedback reveals that the projects have significantly strengthened the surveillance and intervention capacities of border units. However, experience shows that planning should be done more carefully, particularly in complex projects as the procurement of 341 masts under IPA 2014-2016, including the issue of energy supply and coordination of work between the Ministry of Interior and other ministries.

For **voluntary returns**, the EU-funded pilot intervention which started in August 2025 presents a valuable opportunity to generate data that can inform the detailed design of activities under this action. An important lesson learned is the need to support the sustainability of voluntary returns in Syria, as reintegration assistance should be designed to address housing and livelihood needs in addition of transportation to the border and the place of return. Building on existing groundwork for a robust voluntary return mechanism in Türkiye, this action aims to contribute to the broader development of structured, rights-based voluntary return processes in other host countries drawing from the experience gained. In an effort to alleviate potential social tensions inside Syria, support to refugees returning to Syria under this project will be aligned to assistance provided to returnees from other host countries and IDPs as much as possible.

3. DESCRIPTION OF THE ACTION (WHAT)

3.1. Intervention Logic

The **Overall Objectives (Impacts)** of the action are:

1. improved living conditions and resilience of refugees and host communities in Türkiye with enhanced access to essential services such as social assistance, education, and healthcare;
2. strengthened migration management capacities of Türkiye, including border control and voluntary return mechanisms, in line with international human rights standards and the EU *acquis*.

Area of Support 1 – Social Safety Net with education

The **outcomes** (specific objectives) are¹⁰:

- 1.1. continued support to vulnerable refugee households in meeting their basic needs;
- 1.2. consistent enrolment and attendance of refugee children in the Turkish educational system.

The **outputs** are (this is not an exhaustive list):

- delivered unconditional social cash assistance to eligible vulnerable refugee households to support their basic needs;
- strengthened programme accountability and operational systems leading to more responsive and higher-quality services for target audiences;
- delivered conditional cash assistance to families of refugee children attending schools in Türkiye to encourage school attendance and prevent dropout;
- provided child protection services, outreach, awareness raising, and family support services to refugee children at risk of school dropout.

Indicative list of activities (this is not an exhaustive list):

- identification, registration, and verification of beneficiaries for unconditional and conditional social assistance;
- disbursement of unconditional and conditional cash transfers;
- outreach campaigns and awareness-raising sessions targeting parents and caregivers;
- child-protection services, including identification and referral.

¹⁰ For the cash transfers under Outcomes 1 and 2, any changes to the eligibility criteria should be agreed upon with the Commission. The Commission may re-assess the eligibility criteria used to select beneficiaries of the unconditional and/or conditional cash assistance programmes, as well as the scope and application of its payment mechanisms outside these programmes.

Area of Support 2 – Supporting migrant health services in Türkiye

The **outcomes** (specific objectives) are:

- 2.1. continued access to quality healthcare for migrants in Türkiye;
- 2.2. improved institutional capacity and health awareness in migrant communities to support inclusive health service delivery.

The **outputs** are (this is not an exhaustive list):

- quality primary and specialised healthcare services delivered by migrant health centres (MHCs) and Extended MHCs (EMHCs);
- improved healthcare staffing provided and capacity;
- increased awareness and access to healthcare for refugees;
- enhanced institutional mechanisms for policymaking on migrant health;

Indicative list of activities (this is not an exhaustive list):

- provision of consultations and specialised services (e.g. reproductive health, mental health, vaccinations, dental care);
- employment and capacity building of healthcare professionals serving in MHCs and EMHCs;
- delivery of health literacy training sessions in migrant-populated areas, including in schools and community centres;
- organisation of outreach and information campaigns to promote healthcare access;
- development and implementation of migrant health surveys and research;
- support to policymaking through expert consultations and scientific advisory board meetings.

Area of Support 3 – Enhancing inclusive quality education support for refugees in Türkiye

The **outcome** (specific objective) is:

- 3.1. increased enrolment, retention and transition (between levels) in the formal education system (pre-school to secondary) for refugee children in priority provinces (high-refugee-concentration).

The **outputs** are (this is not an exhaustive list):

- financial incentives, material, logistical and psychosocial support delivered to target beneficiaries (children/youth and their families) to support their access to education;
- awareness-raising sessions among families and communities;
- improved education system capacity and staffing;
- quality and appropriate language courses provided to refugee children and youth.

Indicative list of activities (this is not an exhaustive list):

- provision of in-kind and financial support (e.g. school supplies, transportation) to reduce barriers to access and delivery of psychosocial support services;
- awareness raising and social cohesion activities targeting refugee families and host communities;
- employment and training of teachers and professional staff;
- provision of language classes, including adaptation courses, Turkish language classes, catch-up and back-up (remedial) classes and Arabic language courses;
- provision of cleaning materials and cleaning and security staff.

Area of Support 4 – Strengthening of Türkiye’s eastern, southern and south-eastern border

The **outcome** (specific objective) is:

4.1 reduced levels of irregular migration and facilitated regular border crossings resulting in saved lives and enhanced protection of migrants.

The **output is** (this is not an exhaustive list):

- Türkiye’s eastern and south-eastern borders strengthened with modern border management equipment.

Indicative list of activities (this is not an exhaustive list):

- provision of a stationary communication and surveillance mast system (Component 1);
- provision of a lighting system (Component 2);
- provision of ancillary systems or service equipment that support these main systems and their operation, if required and feasible.

Additional activities, subject to the findings of a feasibility study and budget availability:

- provision of snow removal and/or other winter service vehicles for the installation areas (Component 3);
- capacity building and refurbishment of border crossing points along the southern land border with Syria (Component 4);
- capacity building to set up Border Management Working Groups for coordination, control, response planning and risk analysis matters at the provincial level (Component 5).

Area of Support 5 – Enhancing protection response for sustainable voluntary returns to Syria

The **outcomes** (specific objectives) are:

5.1 strengthened consistency, effectiveness and implementation of policies to facilitate voluntary returns to Syria, in line with international law and standards;

5.2 enhanced mechanisms for monitoring voluntary returns and sustained access to protection;

5.3 increased sustainability of voluntary returns and resilience of returnees in Syria.

The **outputs** are (this is not an exhaustive list):

- legal framework and capacity in Türkiye for voluntary, safe, dignified, sustainable and orderly returns to Syria – in compliance with international law and with procedural safeguards enhanced;
- improved and expanded gender-sensitive monitoring mechanisms for voluntary returns and access to protection and related services prior to return;
- returnees provided with material assistance and livelihood support in Syria (reintegration assistance).

Indicative list of activities (this is not an exhaustive list):

- provision of guidance and capacity building tools to the Presidency of Migration Management (PMM), to ensure consistency in voluntary return procedures;
- monitoring of voluntary return procedures by UNHCR;
- referral by UNHCR of returnees in need to available services in Syria
- provision of operational support to PMM for processing returns;
- protection assessment, legal aid, provision of cash assistance and transportation support to returnees support to vocational training and certification (in areas aligned with labour market needs in Syria) for prospective returnees;
- provision of basic needs support to cover immediate accommodation and other needs for a fixed period;
- delivery of assistance for repair of property, following HLP assessment, and livelihood support in Syria;
- protection monitoring of returnees in Syria in close coordination with DG ECHO;
- fostering partnerships between Turkish authorities and local authorities in Syria, NGOs, and international organisations to ensure a coordinated and effective response to the return process.

All procurement carried out with the framework of direct grants under this Action Document will follow the Practical Guide on Contract Procedures for European Union external action (PRAG), including for all stakeholders implementing activities.

Activities under this action will not overlap with other ongoing EU-funded contracts.

3.2 Contribution to horizontal priorities and mainstreaming

Environmental Protection, Climate Change and Biodiversity

Following an environmental screening, this action does not require Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA), or Climate Risk Assessment (CRA).

Several measures will be taken to ‘green’ the action, especially for Areas of Support 2 and 4. Zero waste systems will be introduced in the MHCs, together with the implementation of a waste management mechanism, paying particular attention to plastic reduction and hazardous medical waste. The action will encourage the use of the green public procurement (GPP) approach to purchase equipment. The framework will encompass the selection of the sites (against deforestation, biodiversity loss, and soil erosion), the construction (material used, waste

management) and the operation phases (sustainability and energy efficiency of the buildings). Moreover, training sessions, awareness raising and prevention activities towards patients in the scope of the health literacy activities will include topics and dedicated sessions on waste management, water sanitation and pollution (carbon monoxide poisoning). In addition, the design phase of AoS 4 will anticipate the adverse effects of climate change (floods, droughts etc.) and take appropriate action to prevent or minimise the damage they can cause. The lighting system procured under this action will be partly supplied by solar energy – aiming for as high as possible a percentage of the lighting system to work on solar energy. Stakeholders will also carefully assess their carbon footprint when conducting trips, organising them jointly whenever possible.

Gender equality and empowerment of women and girls

The gender equality agenda will be directly supported through targeted and inclusive activities across all five areas of support.

For the basic needs component (AoS 1), gender-specific vulnerabilities – such as early marriage, child labour, and household responsibilities – will be addressed through outreach, awareness raising, and tailored support. Conditional and unconditional cash assistance will target vulnerable groups, including single women, female-headed households, and elderly women.

Health interventions (AoS 2) will prioritise women's and girls' access to services, with special emphasis on sexual and reproductive health, maternal care, and gender-based violence prevention. Migrant health centres will provide health literacy sessions tailored to women's needs and ensure their representation in decision-making mechanisms such as the Migrant Health Scientific Advisory Board.

In the education sector (AoS 3), teachers and counsellors will be trained on gender-sensitive approaches, and school-based psychosocial services will consider the differentiated needs of girls and boys

Under border management (AoS 4), even though gender equality is not targeted by the action, due to its specific, procurement-focused nature, all the capacity-building activities of this action, such as training sessions and workshops will strive to ensure the equal participation of women and men though – to the extent possible in the specific military and law enforcement environment.

The voluntary return component (AoS 5), in line with the EU Delegation's Country Level Implementation Plan – which sets priorities based on the Gender Action Plan III adopted by the Commission – will contribute to mainstreaming gender and age considerations in voluntary return processes through various activities, such as supporting vulnerable women and children to address protection needs and conducting gender- and age-sensitive protection monitoring of returnees. All capacity-building activities of this action, such as training and workshops, will be organised to ensure the equal participation of women and men.

Across the action, sex-disaggregated data will be systematically collected, analysed, and reported to monitor participation, ensure equitable access, and inform gender-responsive policy and programming.

Human rights

This action promotes a human rights-based approach across all areas of support, ensuring transparency, participation, non-discrimination, and accountability. Access to social assistance, healthcare and education (AoS 1, 2 and 3) is treated as a fundamental right for all refugees, including vulnerable groups such as LGBTIQ+ individuals and persons living with HIV, following a *'one-refugee'* and *'leaving no one behind'* approach. Education and health services are designed to reduce exclusion and promote universal coverage, in line with inclusive national strategies.

The voluntary return component (AoS 5) retains primary focus on the particular needs of the refugee population in Türkiye, the planned interventions will take the concept of fundamental rights (including basic human rights, access to justice, access to education, and labour rights), cultural-socio-economic rights as the guiding principle in line with the United Nations policy framework. This indivisibility approach will contribute to a fair social cohesion in the wider eco-system. The activities will be designed in a way to prevent or reduce all types of exclusion and discrimination likely to arise from prejudices and negative attitudes towards individuals' distinct attributes and circumstances.

Disability

Areas of Support 1, 2 and 3 of this action address disability inclusion. It should also be noted that, under the basic needs component, children with disabilities are also targeted through inclusive education practices, conditional cash assistance, and outreach activities, while disability-disaggregated data will be collected, where possible, to better address their needs. In the health sector, persons with disabilities are reached through Migrant health centres and mobile health services, although improvements in physical and digital accessibility, including in information and communications, remain necessary.

Areas of Support 4 and 5 are not classified as relevant for disability inclusion, but the principles of non-discrimination and equal access are applied throughout the action. Nevertheless, AoS 4, inter alia, aims to reduce the number of landmine victims among farmers, soldiers and migrants, since the equipment to be procured will replace a border protection system based on anti-personnel landmines in a mid- to long-term perspective.

Conflict sensitivity, peace and resilience

This action contributes to strengthening peace and resilience among refugees and host communities in Türkiye, aligning with the broader EU support framework in the region. Through the basic needs component, socio-economic vulnerabilities are addressed to reduce reliance on negative coping mechanisms such as child labour, while promoting school attendance and inclusion. Outreach and awareness-raising activities are designed to foster social cohesion at the local level. In schools, targeted psychosocial support, training of educational staff, and improvements to school infrastructure strengthen individual and institutional resilience, and reduce risks of tension or dropout.

Disaster risk reduction

It is expected that staff training and outreach activities for migrants under especially under AoS 3 of this action will improve awareness of disaster risk reduction (particularly for earthquakes, floods, and heatwaves).

3.3 External assumptions and risks

External assumptions

- A stable political and macroeconomic environment is maintained in Türkiye, and the political and legal context remains conducive to the implementation of refugee support, migration management and social services.
- Turkish authorities continue to uphold their commitments to the implementation of the EU-Turkey Statement of 18 March 2016, including preventing irregular departures towards the EU, and maintain cooperation on migration, including voluntary returns and international protection.
- Relevant institutions remain committed to the harmonisation of national legislation and practices with EU and international standards, particularly in the area of international/temporary protection, countering irregular migration, voluntary return procedures as well in the areas of education and health.
- Sufficient national financial and administrative resources are mobilised to support the implementation and follow-up of the action, and to ensure sustainability of results.
- Coordination among implementing partners and institutions remains effective, avoiding gaps or duplication in service delivery, especially for social protection and education assistance.
- Refugees remain willing to access services provided and no significant cultural or structural barriers arise that would limit participation or inclusion.
- Targeting mechanisms remain robust and efficient in identifying and reaching the most vulnerable populations, including persons with disabilities, children out of school, and households at risk of negative coping mechanisms.
- Qualified staff remain available in sufficient numbers to deliver healthcare, education, and social support services.
- Access to accurate and disaggregated data is maintained to support monitoring and evaluation across all sectors of the action.
- The financial value of cash assistance remains adequate to meet basic needs, despite inflationary pressures and changes in cost of living.
- Public institutions remain committed to inclusive and equitable service provision, and school environments are supported by adequate infrastructure and guidance to promote access and retention for all children.
- Returns to Syria remain voluntary, safe, dignified and sustainable, and are supported by effective coordination with partners and adequate conditions for reintegration inside Syria.

Category¹¹	Risks	Likelihood (High/ Medium/ Low)	Impact (High/ Medium/ Low)	Mitigating measures
1	Limitation on Türkiye's capacity to absorb a higher number of refugees than currently hosted	Low	High	Close monitoring of migration flows and coordination with national stakeholders to adapt service delivery as needed. With returns to Syria, unlikely that number of migrants and refugees in Türkiye will increase.
1	Instability in Syria may lead to increase new influx of Syrian refugees into Türkiye	Medium	High	Close monitoring of the developments in Syria, and their impact on migration flows.
1	Security and/or economic situation in Syria deteriorates, jeopardising prospects for voluntary, safe, dignified and sustainable returns	Medium	High	Activities will follow UNHCR guidance; return-related activities may be suspended if conditions worsen.
1, 5	Increased social tensions due to perception that assistance is funded via national resources	Medium	Medium	Continued awareness raising and communication campaigns to clarify the EU's role in funding and targeting of assistance.
1	Purchasing power of cash transfers gradually diminishes due to inflation	High	High	Inflation will be closely monitored and transfer values adjusted in line with the Turkish Social Assistance Scheme.
2	Delays in the delivery of cash assistance	Low	High	Strong monitoring and coordination mechanisms in place among all implementing partners.
1	Government decision to lift or alter Temporary Protection Status, affecting beneficiaries' eligibility to receive cash assistance	Low	High	Maintaining regular coordination and information-sharing with PMM and relevant ministries; Developing contingency plans for transition to alternative legal statuses; Engaging in advocacy through UN and inter-agency coordination mechanisms.
1	Families planning for return to Syria withdrawing their children from school	High	High	Close follow-up of dropout cases under the child protection component and engage with families for the continuation to education until the return actually materialised.
2	For CCTE household visits and cash assistance beneficiaries, the identities of children	Low	Medium	Strong confidentiality safeguards and data protection protocols are put in place to ensure that beneficiary information remains secure and private.

¹¹ The risk (category) can be related to 1) the external environment; 2) planning, processes and systems; 3) people and the organisation; 4) legality and regularity aspects; 5) communication and information.

	could become publicly exposed			
3	Lack of interest, motivation and commitment by stakeholders to participate in the action	Low	Medium	Türkiye's prior commitments and continued engagement in the refugee response reduce this risk. Ongoing dialogue will be maintained.
1, 2	Increased social tensions in overcrowded schools	Low	Medium	Targeted and tailored support throughout the provinces/ districts based on their specific needs (teachers and administrators, cleaning staff and cleaning materials, educational spaces and education materials, differentiated school transports based on neighbourhood profile including number of refugees students ...)
1, 3	Sexual violence, harassment or abuse of children and adults while involved in project activities, which could be potentially exacerbated by the increased social tensions across Türkiye between refugees and host communities	Low	Medium	Child safeguarding practices will be integrated where possible, for teaching staff, as well as all personnel who have interactions with children (cleaning, security and transport personnel) with both pre-service and in-service training. As much as possible education institutions should have established safeguarding complaints handling, response and disciplinary mechanisms in place.
2, 3	Syrian healthcare staff may return to Syria, reducing service capacity	Medium	High	Regular workforce planning with the Ministry of Health to anticipate and address staffing gaps.
5	Risk of disinformation and foreign information manipulation	Medium	Medium	Coordination with EEAS and EU Delegation to support communication efforts and clarify EU's support in Türkiye.
2	Delays in imports and procurement schedule	Medium	Medium	Planning done in such a way that the production and procurement schedule will not be interrupted.
1	Inappropriateness of solar powered lightings for borders in unfavourable conditions	Medium	Low	Electricity- (non-solar) powered lightings to be installed at borders in unfavourable conditions for solar power.
2	Incompatibility issues between the procured equipment and the already existing equipment	Medium	High	The implementing partner will be in close contact with the beneficiaries from the earliest stages, conduct joint site visits, a needs assessment and feasibility study, and involve technical experts in order to mitigate relevant risks.
1	Inaccessible (e.g. mountainous) terrain does not allow for	Medium	Medium	The implementing partner, in consultation with the relevant national stakeholders, has developed a risk scenario depending on the

	construction of the stationary systems (i.e. communication & surveillance masts and lighting)			reduction of equipment needs for the main systems categories in unsuitable areas, which offers alternative funding options for additional coverage with the same equipment along other border stretches or additional supplies categories and activities, as outlined in the description of the action.
2	Staff of the PMM Voluntary Return Department who took part in the training activities are assigned to other departments through rotation	Low	Medium	PMM limits the staff rotation in the relevant departments to keep the built capacity within the organisation.
2	The planned visibility activities are obstructed by security concerns or social tensions or vulnerabilities	Medium	High	Visibility and communication activities will be implemented in close coordination with the European Union Delegation (EUD) and PMM. Should the visibility and communication plan not be conducted as planned for any reason out of UNHCR's control, discussions will take place with EUD to agree on the best way forward.
2	Those assessed to be eligible for transport cash assistance did not actually return	Low	High	Per international protection standards and the principle of voluntary returns, individuals retain the right to reconsider their decision to return to their country of origin (Syria) at any point prior to departure. The absolute prohibition of forced returns imposes clear limitations on any enforcement mechanisms that could compel return. Given the heightened vulnerability and precarious conditions of refugee populations, punitive measures—such as sanctions or reimbursement of assistance—are not viable. However, in order to minimise the risk of abuse, the action will put in place effective data-sharing channels with PMM, robust monitoring mechanisms to continuously track cash assistance and return figures and put in place quality assurance systems (percentage thresholds after which cash assistance will be put on hold and alternative assistance methodologies will be developed).
2	Cash assistance for transportation might be construed as a push factor for return	Medium	High	UNHCR's monitoring of the voluntary nature of returns through individual and confidential interviews with returnees and provision of free legal aid to returnees under the Action constitute key safeguards against creating such push factors for returns.

4. IMPLEMENTATION ARRANGEMENTS

4.1. Financing agreement

No Financing Agreement is foreseen to be concluded for implementation of this action.

4.2. Indicative implementation period

The indicative operational implementation period of this action, during which the activities will be carried out and the corresponding contracts and agreements implemented, is 72 months from the date of adoption by the Commission of this Financing Decision.

Extensions of the implementation period may be agreed by the Commission's responsible authorising officer in duly justified cases.

4.3. Implementation modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action plan with EU restrictive measures¹².

4.3.1. Direct management (grants)

4.3.1.1. Grants

a) Purpose of the grant(s)

The grants will contribute to achieving **Outcomes (specific objectives) 1.1 and 1.2 under Area of Support 1 – Social Safety Net with education, Outcomes (specific objectives) 2.1 and 2.2 under Area of Support 2 – Supporting migrant health services in Türkiye, and Outcome (specific objective) 3.1 under Area of Support 3 – Enhancing inclusive quality education support for refugees in Türkiye.**

b) Justification of a direct grant

For **Outcomes 1.1 and 1.2 under Area of Support 1 – Social Safety Net with education.** Under the responsibility of the Commission's authorising officer responsible, a grant may be awarded without a call for proposals to the Ministry of Family and Social Services of Türkiye and the Turkish Red Crescent (TRC, as co-beneficiary) for the implementation of the action, in line with Article 198, points (c) and (f) of the Financial Regulation.

¹² See [EU Sanctions Map](#). Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

Under the responsibility of the Commission’s authorising officer responsible, the recourse to an award of a grant without a call for proposals is justified because the Ministry has the relevant *de jure* and *de facto* monopoly the provision of social assistance, protection and cash assistance in the Republic of Türkiye, and has set up a unique partnership with the TRC for the provision of care, and more specifically the provision of cash assistance to refugees in Türkiye. A similar programme targeting Turkish nationals has been continuously implemented by the Ministry of Family and Social Services for decades to ensure the attendance of poorest children in the educational system in Türkiye.

For **Outcomes 2.1 and 2.2** under **Area of Support 2 – Supporting migrant health services in Türkiye**. Under the responsibility of the Commission’s authorising officer responsible, a grant may be awarded without a call for proposals to the **Ministry of Health of Türkiye** for the provision of migrant health services in Türkiye.

Under the responsibility of the Commission’s authorising officer responsible, the recourse to an award of a grant without a call for proposals is justified because the beneficiary is in a *de facto* monopoly situation for the implementation of the relevant outcomes of the action, in line with article 198 (c) of the Financial Regulation. The Ministry of Health of Türkiye is the relevant Turkish governmental body tasked to provide healthcare services in Türkiye. It has also been benefiting from financial support through grants awarded without a call for proposals by the European Commission in the past years under the Facility for Refugees/EU Support to Refugees to aid migrant health services in the country.

For **Outcome 3.1** under **Area of Support 3 – Enhancing inclusive quality education support for refugees in Türkiye**. Under the responsibility of the Commission’s authorising officer responsible, a grant may be awarded without a call for proposals to the **Ministry of National Education** to provide inclusive and quality education services for refugee children in Türkiye.

Under the responsibility of the Commission’s authorising officer, the recourse to an award of a grant without a call for proposals is justified due to the beneficiary’s *de jure* monopoly status for the implementation of the relevant outcome of the action, in accordance with Article 198(c) of the Financial Regulation.

The Ministry of National Education is the pertinent Turkish governmental body responsible for ensuring high-quality education in Türkiye and is therefore the only appropriate body to facilitate access to quality education and integration into the Turkish educational system for refugee children.

4.3.2. Indirect management with a pillar-assessed entity

Part of this action, in relation to **Area of Support 4 – Strengthening of Türkiye’s Eastern, southern and south-eastern border (Outcome 4.1)** may be implemented in indirect management with the International Centre for Migration Policy Development (ICMPD).

Implementation by this entity entails the two (and, possibly, an additional three) components outlined in Area of Support 4 for strengthening Türkiye’s eastern and south-eastern border related to procuring the stationary communication and surveillance mast system (Component 1), the lighting system (Component 2), and, if required and feasible, provision of ancillary systems or service equipment that supports these main systems and their operation, and – subject to the findings of a feasibility study and fully costed market research and the remaining budget – also related to procuring snow removal and/or other winter service vehicles for the areas of

installation of the stationary communication and surveillance systems (Component 3), capacity building for staff of the Ministry of Interior as well as other ministries in charge of border crossing points along the country's southern land border with Syria (Component 4) and capacity building to support the establishment of Border Management Working Groups at provincial level on coordination and risk analysis matters (Component 5).

The envisaged entity has been selected using the following criteria:

- extensive experience in project implementation within Türkiye in areas related to border management, as well as in areas such as legal migration, irregular migration, national assisted voluntary return, asylum & international protection, human trafficking, migration and development, and the socio-economic integration of migrants and refugees;
- previous experience in project implementation with the Ministry of Interior of the Republic of Türkiye and the Ministry of National Defence of the Republic of Türkiye;
- physical presence in Türkiye;
- experience in procurement, compliant with EU Financial Regulation and Public Procurement Directive, of large-scale supplies and their delivery to project beneficiaries in conflict areas;
- enjoying the Ministry of Interior's trust to implement this action in a highly sensitive area of assistance;
- significant experience in handling EU-funded grants in the area of migration and border management.

In case the envisaged entity would need to be replaced for one or more of the components under **the Area of Support 4 - Strengthening of Türkiye's Eastern, southern and south-eastern border (Outcome 4.1)**, the Commission's services may select a replacement entity(ies) using the same criteria. If the entity is replaced, the decision to replace it needs to be justified.

Part of this action, in relation to **Area of Support 5 – Enhancing protection response for sustainable voluntary returns to Syria (Outcomes 5.1, 5.2 and 5.3)** may be implemented in indirect management with the UNHCR.

This implementation entails the enhancement of the Protection Response for Sustainable Voluntary Returns to Syria.

The envisaged entity has been selected using the following criteria:

- strong expertise and operational capacity in financing of development projects in the field of international and temporary protection and voluntary repatriation;
- wide presence in Türkiye, important policy actor in the sector concerned;
- key implementing partner for the delivery of the EU development assistance;
- well-established partnerships with the relevant Turkish authorities;
- track-record experience with large-scale procurement actions.

If the envisaged entity needs to be replaced, the Commission's services may select a replacement entity using the same criteria. If the entity is replaced, the decision to replace it needs to be justified.

4.3.2.1 Changes from indirect to direct management (and vice versa) mode due to exceptional circumstances

If the implementation modality under direct management as defined in Section 4.3.1 (grants) for **Area of Support 1 - Social Safety Net with education (Outcomes 1.1 and 1.2)**, **Area of Support 2 – Supporting migrant health services in Türkiye (Outcomes 2.1 and 2.2)** and **Area of Support 3 – Enhancing inclusive quality education support for refugees in Türkiye (Outcome 3.1)** cannot be implemented due to circumstances beyond the control of the Commission, the modality of implementation by Indirect management with a pillar-assessed entity would be used. The entity will be selected by the Commission’s services using the following criteria: previous experience and specific expertise in the sectors of basic needs/education (in relation to Outcomes 1.1 and 1.2), health (in relation to Outcomes 2.1 and 2.2), and education (in relation to Outcome 3.1), demonstrated expertise in the management of projects of comparable scope and value, prior experience of implementing large-scale projects with institutions in the Republic of Türkiye and developed cooperation with the Turkish authorities in supporting refugees.

4.4. Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions.

The Commission’s authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realisation of this action plan impossible or exceedingly difficult (Article 28(10) NDICI Regulation).

4.5. Indicative Budget

Indicative Budget	EU contribution 2025 (EUR)	EU contribution 2026 (EUR)	EU contribution 2027 (EUR)	Total EU contribution 2025-27 (EUR)
	Implementation modalities			
Methods of implementation – cf. Section 4.3				
Grants – (direct management) cf. Section 4.3.1	280 000 000.00	357 000 000.00	203 000 000.00	840 000 000.00
Indirect management with pillar-assessed entities – cf. section 4.3.2	290 000 000.00	21 000 000.00	0.00	311 000 000.00
Evaluation – cf. section 5.2	may be covered by another Decision	may be covered by another Decision	may be covered by another Decision	may be covered by another Decision

Audit and verification – cf. ection 6				
Strategic communication and Public diplomacy – cf. section 7	will be covered by another Decision	will be covered by another Decision	will be covered by another Decision	will be covered by another Decision
Contingencies	0.00	0.00	0.00	0.00
Totals	570 000 000.00	378 000 000.00	203 000 000.00	1 151 000 000.00

5. PERFORMANCE MEASUREMENT

5.1 Monitoring and reporting

Monitoring activities carried out for this action will aim to identify successes, problems and/or potential risks so that corrective measures are adopted in a timely fashion. Both types of internal monitoring will be undertaken in an inclusive way, involving key stakeholders.

Internal monitoring

The day-to-day technical and financial monitoring of the implementation of this action or parts of the action will be a continuous process and part of both the implementing partners and Commission’s responsibilities.

To this aim, the implementing partners shall establish a permanent internal, technical and financial monitoring system for the action and produce regular progress reports (at least annually) and final reports. Each report should provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its outputs and contribution to the achievement of its outcomes, and if possible, at the time of reporting, contribution to the achievement of its Impacts, as measured by corresponding indicators, using as reference the log frame matrix. The implementing partners will also comply the monitoring and reporting requirements of the EU Support to Refugees Results Framework indicators and provide quarterly updates on those indicators.

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

External monitoring

Monitoring by the Commission will be also carried out, with the support of an external contractor, and will consist of activities such as:

- analysis and feedback on the action’s reporting documents and data;
- assessment of the quality of the action’s internal monitoring systems and where required, plans/provides support to improve them (e.g. provision for periodical ‘data cleaning’; check for mistakes and look for duplications, systematic misunderstanding, or missing data; support data users in understanding them: how they are collected, what they mean);

- attendance at the action's Steering Committee meetings, quarterly monitoring meetings; monthly management meetings and other meetings, information sharing and discussion;
- missions/visits to premises/action's sites where activities are taking place and on-the-spot checks.

Interim and final reports shall assess how the action is considering the principle of gender equality, human rights-based approach, and rights of persons with disabilities including inclusion and diversity. Indicators shall be disaggregated at least by sex, whenever relevant.

Monitoring activities carried out for this action will aim to identify successes, problems and/or potential risks so that corrective measures are adopted in a timely fashion. Both types of internal monitoring will be undertaken in an inclusive way, involving key stakeholders.

5.2 Evaluation

The Commission may carry out a mid-term, final or *ex post* evaluation for this action or parts of the action. If a mid-term or final evaluation is not envisaged, the Commission may, during implementation, decide to undertake such an evaluation for duly justified reasons either on its own decision or on the initiative of the Republic of Türkiye. As recalled by the Better Regulation guidelines¹³ evaluations may be identified as a result of new strategic decisions or significant (negative) feedback on performance (e.g. implementation problems, findings from monitoring results, complaints or infringements, audit reports).

In line with the spirit of partnership, Commission services and the Republic of Türkiye and other key stakeholders may also carry out joint evaluations.

The Republic of Türkiye and other key stakeholders shall contribute to and provide the necessary information for the different evaluation exercises. Following agreement among the parties, evaluation reports could be made public to allow the relevant stakeholders, including civil society representatives, to express their views so as to contribute to the accountability function of evaluation.

As a result of an evaluation, and where appropriate, in agreement with the Republic of Türkiye, the Commission and the implementing partners jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the relevant components.

The financing of the evaluation shall be covered by another measure constituting a Financing Decision.

6. AUDIT AND VERIFICATIONS

Without prejudice to the obligations applicable to contracts concluded for the implementation of interventions under this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements concluded for interventions or their parts deriving from this action.

¹³ Better Regulation Guidelines, SWD(2021) 305 final.

7. STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

All entities implementing EU-funded external interventions have the contractual obligation to inform the relevant audiences of the Union's support for their work by displaying the EU emblem and a short funding statement as appropriate on all communication materials related to the interventions concerned. To that end they must comply with the instructions given in the 2022 guidance document [*Communicating and raising EU visibility: Guidance for external actions*](#) (or any successor document).

This obligation will apply equally, regardless of whether the concerned interventions are implemented by the Commission, the partner country, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU Member States. In each case, a reference to the relevant contractual obligations must be included in the respective financing agreement, procurement and grant contracts, and contribution agreements.

For the purpose of enhancing the visibility of the EU and its contribution to this action, the Commission may sign or enter into joint declarations or statements, as part of its prerogative of budget implementation and to safeguard the financial interests of the Union. Visibility and communication measures should also promote transparency and accountability on the use of funds. Effectiveness of communication activities on awareness about the intervention and its objectives as well as on EU funding of the intervention should be measured.

Implementing partners shall keep the Commission and the EU Delegation/Office fully informed of the planning and implementation of specific visibility and communication activities before the implementation. Implementing partners will ensure adequate visibility of EU financing and will report on visibility and communication activities as well as the results to the relevant monitoring committees.