
Addressing Cross-cutting Issues in Human Trafficking Policy: Recommendations for Turkey

Meltem ERSAN*

Abstract

Since the disintegration of the Soviet Union, human trafficking has emerged as one of the major trans-national phenomena affecting Turkey. Although trafficking in human beings is widely acknowledged as a serious crime and is countered by a sophisticated international law, global efforts to prevent trafficking and protect trafficked persons remain a serious challenge. This paper argues that such trafficking is connected to a number of cross-cutting issues such as gender, labour, development, and human security. The paper assesses current responses in the light of these issues, identifying gaps in actual prevention and protection efforts in the global context. The Turkish government's recent reforms regarding migration management have been intended to respond to new migration dynamics. The article provides policy recommendations to address the cross-cutting issues to counter human trafficking in a holistic and comprehensive manner.

Key Words

Human trafficking, trafficking in human beings, trafficking in persons, cross-cutting issues, global efforts in countering human trafficking, prevention, protection, challenges, Turkish policy.

Introduction

Today, it is estimated that between 800,000 and 2,500,000 people every year are subject to human trafficking within or across borders for purposes of exploitation. Human trafficking (also termed trafficking in human beings or trafficking in persons) is a serious crime and a violation of universal conventions, principles, and norms on human rights. Following the global experience of such trafficking over the last decade, states, international organizations, civil society, and the business community have been debating new and innovative approaches to counter human trafficking as a result of a failure of primary approaches to prevent trafficking and protect trafficked persons.

Although human trafficking dates back as far as slavery, in the last quarter of the 20th century the phenomenon has transformed radically, both in terms of quantity and quality, due to a series of factors attributed to “globalization”. Since the end of the Cold War, the concept of

* National Program Officer of the International Organization for Migration.

“security” has expanded to encompass threats such as global warming, refugee issues, and human trafficking, which cannot possibly be handled within national borders, and thus issues against which all states need to seek a common solution. Yet, the extreme complexity and ever-changing nature of human trafficking makes it difficult to combat this crime in practice.¹

Although trafficking in human beings is widely acknowledged as a serious crime and is countered by a sophisticated international law, global efforts to prevent trafficking and protect trafficked persons remain a serious challenge.

Since the beginning of the 19th century, this international legal framework has included various legal instruments to prevent trafficking in women, children, slave trade, and abolition of forced and compulsory labour, elimination of worst forms of child labour and child pornography and prostitution. In addition human rights instruments and principles have been guiding on equal rights and equal treatments. The 1948 Universal Declaration of Human Rights provides a normative basis for international human rights standards

and acknowledges equality, liberty, security, and freedom, while prohibiting slavery, servitude, and the slave trade.

In the last decade, two important new instruments regarding human trafficking have entered into force. The first is the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (Palermo Protocol) supplemental to the United Nations Convention against Transnational Organized Crime, which entered into force on 25 December 2003. The Protocol provides the first detailed and comprehensive definition of human trafficking, and applies to all people but particularly women and children due to member states’ recognition of their particular vulnerability. The second instrument is the Council of Europe Convention on Action against Trafficking in Human Beings, which opened for signature in 2005 and entered into force in 2008. The Convention applies to all forms of trafficking, whether national or transnational and whether related to organized crime or not, as well as containing more detailed provisions for protection of trafficked persons. The parties aim to promote gender equality and gender mainstreaming in development, implementation, and assessment of measures assisting trafficked persons. The convention also refers to trafficking

as a violation of human rights and an offence against the dignity and integrity of a human being. One difference of the Convention from the Palermo Protocol is the establishment of an independent monitoring mechanism of independent experts called GRETA (the Group of Experts on Action against Trafficking in Human Beings) that is capable of controlling the implementation of obligations in countries which have adopted the Convention.

Trafficking in persons is a complex phenomenon encompassing a vast set of broader contexts shot through by cross-cutting issues which impact on human rights and human security.

There are thus legally binding instruments for combating human trafficking and these instruments exist within the concept of criminal law with human rights aspects. They have not completely succeeded, however, because trafficking in persons is a complex phenomenon encompassing a vast set of broader contexts shot through by cross-cutting issues which impact on human rights and human security. Thus, although there is an international legal framework in place, global efforts to eliminate human trafficking still face

significant challenges. What needed is enhancement of understanding of a human trafficking and a new, holistic approach to tackling the problem.

With the enforcement of Palermo Protocol, countries have adopted it into their national law and have taken legal and administrative measures to combat human trafficking. Nevertheless, there have been disparities in adopting the Protocol which have resulted in varying practices worldwide. Best practices therefore became an important tool for sharing experiences at national, regional, and international level. Initially, counter-trafficking measures mainly focused on prevention, protection, and prosecution, called the “3P” approach, later enhanced to a “4P” approach with the addition of partnership as it was understood that the fight against human trafficking requires involvement of a diverse array of actors and cooperation as well as coordination at national and international level.

Prevention activities mainly focus on public awareness, and messages have focused on the pitfalls of human trafficking. Although root causes such as demand, gender equality have been repeatedly mentioned by academia and relevant actors, policy and actions have not taken these sufficiently into account when attempting to prevent human trafficking.

Protection measures have aimed to identify and assist trafficked persons. Nevertheless, global efforts at identification seem to have remained limited to victims of sexual exploitation, while the victims of other forms of trafficking such as forced labour or organ removal often remain unknown. Even identifying the victims of sexual exploitation remains a challenge. Worldwide, there are still many trafficked persons who remain unidentified due to perceptions and prejudices, the nature of the crime, and limited support for potential trafficked persons at the identification stage. Non-identification leads to all kinds of vulnerabilities, including the danger of re-trafficking. Assistance to trafficked persons still concentrates on urgent needs such medical and psychological assistance rather than providing long-term solutions, such integration and empowerment. One best practice has been cooperation of non-governmental organizations (NGOs) and law enforcement in the identification process. Yet even this model is not enough in reaching persons who are victims of other forms of human trafficking such as forced labour. There is a need for involvement of many stakeholders like labour inspectors, labour unions, professional associations in different sectors as well as private sector.

Assistance to trafficked persons still concentrates on urgent needs such medical and psychological assistance rather than providing long-term solutions, such integration and empowerment.

Prosecution of human traffickers is essential. Yet, despite the international legal framework, convictions are extremely rare, and do not reflect the real scale of the problem. This is an impact not only on the criminal justice system and the rule of law, but also a moral issue for trafficked persons left with a sense of injustice. Capacity-building training has primarily targeted law enforcement and later the judiciary as important actors in the process in order to increase prosecutions and maintain access to justice for trafficked persons. Capacity-building activities also ensure better understanding of the crime and handling of victims as witnesses to a serious crime. Such activities should include developing specific curricula in law schools and justice academies. Finally, legal assistance systems urgently need to be strengthened in legislation and practice through the active involvement of attorneys. In many countries, the lack of systematic legal assistance to trafficked persons affects both successful prosecution and further

violates the human rights of trafficked persons in the process of access to justice. For this reason, international partnership is essential to further efforts to increase prosecution in the countries of origin, transit, and destination, including mutual legal assistance.

Since 2000, human trafficking has been one of the top crimes in the international arena which obliges countries to take serious measures. By its very nature, the phenomenon is necessitating changes in traditional, *ad hoc* responses. Human trafficking is shot through by cross-cutting issues such as labour, human security, gender and development that impact on human rights, and human dignity and integrity, and which need to be addressed at the policy and programme levels. In 2010, the 10th anniversary of the adoption of the Palermo Protocol, member states renewed their commitment to the fight against human trafficking when the UN General Assembly adopted the Action Plan to Combat Trafficking in Human Beings.² The Plan includes 61 actions in five chapters on the general principles and UN instruments and bodies, prevention of trafficking in persons, protection of and assistance to victims of human trafficking, prosecution of crimes of human trafficking, and strengthening of partnerships against such traffic. The Action Plan highlights broader policies

and programs in prevention of human trafficking, including the following suggestions to deal with cross-cutting issues:

- Mainstream the issue of trafficking in persons into the broader policies and programmes of the United Nations aimed at addressing economic and social development, human rights, the rule of law, good governance, education and natural disaster and post-conflict reconstruction;
- Adopt and implement comprehensive policies and programmes at the national level and, as appropriate, at the sub-regional and regional levels to prevent all forms of trafficking in persons that are in line with relevant policies and programmes on migration, education, employment, gender equality, empowerment of women, and crime prevention, in accordance with relevant international human rights instruments.³

With a better understanding of the new features of human trafficking, learning from experiences and defining gaps for holistic approaches will promote efforts in the fight against it. This should also incorporate cross-cutting issues and create partnerships at all levels.

Labour and Human Trafficking

The International Labour Organization (ILO) estimates that 20.9 million people are victims of forced labour globally, trapped in jobs into which they were

coerced or deceived and which they cannot leave.⁴ A total of 18.7 million (90%) are exploited in the private economy, by individuals or enterprises.

Although all forms of human trafficking are stipulated in international law, global efforts have failed to respond the problem of forced labour.

The UN Special Rapporteur on human trafficking, especially women and children, has shared her observation that:

human trafficking is in most cases committed by non-state actors and that businesses often derive economic benefits from labour or services provided by trafficked persons, whether directly or indirectly, including through their supply chains. Businesses may be linked to human trafficking in various ways. They may be directly implicated in the crime of trafficking when they recruit, transport, harbour or receive persons for the purpose of exploitation during the course of their business. This may occur with or without the knowledge of the management or if the company has recruited the persons itself or through a third party, such as a private recruitment agency.⁵

In the recent years, the efforts in preventing forced and exploited labour focuses supply chain with the link between everyday products and the exploitative conditions under which

these may have been produced by persons being potentially trafficked. This approach aims to raise consumer awareness on human trafficking particularly on labour exploitation as well as urges business community to respond human trafficking including ethical recruitment.

Although all forms of human trafficking are stipulated in international law, global efforts have failed to respond the problem of forced labour. There are several causes, such as the lack of a comprehensive policy or program of systematic labour administration and inspections, the need for the involvement of multi-stakeholders, and the limited efforts at identification of trafficked persons in various sectors.

Human Security and Human Trafficking

As human security addresses both individual and community, it is added value in preventing of trafficking through analysis of the root causes and consequences of the threats.

It should also be remembered that environment of violence, crime, criminal networks threaten security and development of community. It is another dimension in connection to human trafficking.

The concept of human security is also important in addressing vulnerabilities, insecurities as well as protection and empowerment of persons. The holistic human security approach expands the services to vulnerable groups including trafficked persons. Moreover the human security approach builds up cooperation with local authorities, civil society, media and community actors and others.

Although there have been some state initiatives and programs in previous years, there is still a need for wider consideration of this approach. Moreover, gender and development are also important cross-cutting issues that need to be addressed, particularly in terms of inequalities, human development and poverty reduction.

Turkey's Efforts in the Fight Against Human Trafficking

Since the disintegration of the Soviet Union, human trafficking has emerged as one of the major transnational phenomena affecting Turkey. Responding to the problem, the country has developed a counter-trafficking policy and program, implemented by the government in 2002-2010 in cooperation with relevant stakeholders and with high-level political endorsement. Turkey's counter-trafficking policy became

particularly active in 2002, after Turkey became a part of the UN Convention against Transnational Organized Crime and its supplementary Palermo Protocol.⁶ In a very short span of time Turkey made the necessary revisions in national legislation in criminalizing and preventing human trafficking. The legal changes followed consistent monitoring of the implementation of laws related to human trafficking and resulted in further revisions to the legal framework.

The second important step was the establishment of an inter-institutional coordination mechanism by creating the National Task Force on Combating Trafficking in Persons (NTF), which is the main platform in Turkey's actions in the fight against human trafficking. The NTF is chaired by the Ministry of Foreign Affairs (MFA) and more than 30 institutions are represented including three local NGOs which implement a counter-trafficking programme particularly run the shelters for trafficked women within the National Referral Mechanism. The International Organization for Migration (IOM) and the European Union (EU) Delegation to Turkey have been observers on the NTF since 2005.

The NTF prepared Turkey's first National Action Plan on Combating THB (Trafficking in Human Beings),

which was successfully implemented in 2003- 2007. The plan was simple, containing specific actions such as the establishment of a helpline to rescue actual and potential trafficked persons, the opening of shelters, the organization of capacity-building training of law enforcement and the judiciary, as well as legal and administrative revisions to prevent human trafficking. The responsibilities of each institution in implementing the plan were determined in line with their areas of work. Although there was no structured monitoring mechanism, as chair, the MFA conducted regular meetings to define and discuss gaps and further requirements in fulfilling international responsibilities. The NTF and closely followed international debate, including reports such as the *Trafficking in Persons Annual Report* by the U.S. State Department, which categorizes countries according to their actions to comply with minimum standards.⁷ The first plan was partly conceived to raise Turkey's ranking in this report by responding to criticized areas, and thus resulted in *ad hoc* responses in emerging areas. Turkey was moved from tier 3 to tier 2 in 2005 and has remained in the same tier since that time. The main criticism of the report was about the identification & protection of trafficked persons and the sustainability of the program. The EU

Progress Report also highlighted similar issues for Turkey related to Chapter 24 for the last years. 2013 Progress Report⁸ stated that a comprehensive, multi-disciplinary and victim-oriented approach to trafficking still needs to be developed and victim identification needs to be improved. Victims need to have unhindered access to assistance, support and protection.

The system needs to be strengthened regarding women, children, and men subject to human trafficking, all forms of human trafficking whether across borders or internal, and with the involvement of all stakeholders.

The second action plan was accordingly developed within the framework of a twinning project with international partnership and approved by the Prime Minister in June 2009. It is a sectoral action plan which is still valid for long term actions but knowledge about this plan is limited to a few key institutions. As an implementation plan has not yet been discussed and prepared by the NTF, there is no structural implementation and monitoring of this plan. This affects Turkey's efforts in countering human trafficking and in taking comprehensive and timely measures.

Turkish law enforcement agencies have played an important role in the efforts to combat human trafficking, assist trafficked persons, and implement the first action plan. The training of law enforcement officials has improved their effectiveness in investigation and identification of trafficked persons. One of the good practices identified was the law enforcement partnerships with three NGOs in assisting trafficked persons within the National Referral Mechanism (NRM) under the framework of signed agreements. The Department of Foreigners, Border and Asylum (DFBA) of the Turkish Police was assigned as the coordinating agency, including coordination of the NRM in assisting trafficked persons. When the NRM was established in 2004, all identified trafficked persons were foreign women from the former Soviet Union. NRM is designed to assist foreign victims, and therefore DFBA is given the duty of coordinating it. After a while, the relevant institutions in the NTF realized the system was not covering Turkish cases and needed to be restructured to include Turkish cases. Furthermore, the system needs to be strengthened regarding women, children, and men subject to human trafficking, all forms of human trafficking whether across borders or internal, and with the involvement of all stakeholders.

The system needs to be strengthened regarding women, children, and men subject to human trafficking, all forms of human trafficking whether across borders or internal, and with the involvement of all stakeholders.

The Council of Ministers approved free health services for trafficked persons in 2003. In total, the Turkish authorities have been able to identify and assist more than 1,320 trafficked persons since 2004. The majority of trafficked persons were sexually exploited women aged between 18 and 25, originating mainly from the former Soviet Union. As a result, three specialized shelters for trafficked women have been opened. The shelter in Istanbul was opened in 2004 and run by Human Resource Development Foundation. The Ankara shelter was opened with the support of Ankara Greater Municipality and IOM with funding from the Swedish International Development Cooperation Agency (Sida) and is run by the Foundation for Women's Solidarity. The shelter in Antalya was opened in 2009 with the support of IOM and Sida funding and is run by the Antalya Family Counsellors Association. The beneficiaries of the shelters were provided psychological and medical assistance

and legal counselling. Although Turkey provides a 6 months residence permit for trafficked persons, only 45 persons have applied for this residence since 2004, and the rest preferred to return to their home countries. There may be many factors for their return, but two main ones can be mentioned: i) they have families, and 60% of trafficked women are mothers; ii) the support mechanism is limited, with some services but little support for empowerment and integration of the victims into society. The Turkish government has been cooperating with the IOM since 2004 for voluntary, safe, and dignified return of trafficked persons, and 830 trafficked persons have been assisted by the IOM in the framework of the cooperation within the National Referral Mechanism.

Although Turkey provides a 6 months residence permit for trafficked persons, only 45 persons have applied for this residence since 2004, and the rest preferred to return to their home countries.

Three public awareness raising campaigns have also been conducted by the NTF in cooperation with the IOM with the support of international donors including the EU and USAID.

The campaigns focused on media prejudices towards women from former Soviet Union, who were labelled “Natashas”. The campaigns helped the understanding of trafficking and its consequences, particularly on trafficked persons, their families, and society, as well as promoting the 157 Helpline for Trafficked Individuals to rescue trafficked persons. Furthermore, preliminary research conducted in 2008 provided recommendations on curbing demand for sexual and labour exploitation and organ trafficking that still need to be followed up.⁹ Similar comprehensive studies monitoring the changing dimensions of human trafficking still need to be carried out to generate strategy and policy recommendations. For example, in 2012, the Turkish government facilitated new registration and work permit procedures, particularly focusing on undocumented domestic workers, in order to prevent labour exploitation and forced labour. Premiums were reduced and work permit procedures simplified, resulting in an increase in the number of work permits issued; while only 422 work permits were issued for foreign domestic workers in Turkish homes in 2011, the regulation allowed for the issuance of 8,878 work permits in 2012. The effects of the new procedure should be carefully monitored in the short and longer term. There is further need to

raise public awareness in Turkish society regarding the new procedures in order to increase legal applications for work permits by domestic workers sponsored by Turkish individuals/families.

Furthermore, capacity building activities for the judiciary have increased prosecutions for trafficking offences, and the Supreme Court of Appeals has also provided guidance to the judiciary by approving more than 70 decisions related to various forms of human trafficking. Although these decisions can be accessed one by one through the National Judiciary Informatics System, it is also important to analyse the main factors in successful prosecutions as well as failed ones to further instruct the judiciary.

Turkey has also signed cooperation agreements with key countries of origin, actively involved itself in the international arena, and established close cooperation with international organizations. This partnership at the national and international level has greatly increased effectiveness. The government has also established cooperation with relevant NGOs and has funded their activities since 2010.

Broadly speaking, we can divide Turkey's efforts to curb human trafficking into two phases: the period of 2002-2010 and the period after 2010. In the first period,

we can observe political will, a good level of preparation at the bureaucratic level, ownership, partnership with NGOs and international organizations, but *ad hoc* responses rather than sustainable policy, strategy, and programmes. In 2010, Turkey evaluated its efforts, defining gaps, best practices, and further needs considering emerging features of human trafficking. After that, we observe a more holistic approach, as well as an institutional handover of coordination of the counter trafficking policy and programme.

Broadly speaking, we can divide Turkey's efforts to curb human trafficking into two phases: the period of 2002-2010 and the period after 2010.

The Turkish government is currently carrying out a thorough reform of its migration policy through establishing a legal, institutional and administrative framework for a modern, well functional and human rights-based migration management system that responds to country needs and migration challenges. These wide-ranging efforts also include drafting a new framework law to prevent trafficking in persons and protect the trafficked persons.

In line with the migration reform, there are new legal and institutional changes in Turkey that will affect policy and programme on countering human trafficking. The most important one is the establishment, with the adoption of the law on Foreigners and International Protection, of a new specialized institution within the Ministry of Interior, called the General Directorate of Migration Management.¹⁰ The General Directorate also has a specific department for Protection of Trafficked Persons. This department will be responsible for the coordination of counter-trafficking actions and all measures in assisting trafficked persons.

Overall, the evaluation of past policies and programmes has also demonstrated that issues such as root causes, particularly demand, as well as cross cutting issues, including gender, labour, human security and migration regulations, all need to be dealt with in a holistic way. Turkey is now in a new phase of its efforts in fighting against human trafficking. The country has gained experience, closely followed global developments, and defined emerging areas to further renew its policy and programme.

Conclusion

This article concludes with policy recommendations for Turkey:

- Prioritise trafficking in women and children as human security threat and provide effective measures.
- Consider domestic violence as a root cause of trafficking in women and children, and recognize that this group is not only at risk of trafficking but also at risk of abuse and gender-based violence. The assistance needs of victims, such as psychological, legal, medical, and social assistance, are often similar. Government can establish a comprehensive and interconnected system to deliver assistance to these persons. When making policy and action plans related to human trafficking and human security, connectivity between the needs to be addressed and inter-agency cooperation should be enhanced. It is also important to address social problems related to human trafficking and domestic violence in order to make policy and provide support to victims and persons at risk.
- Design an education policy to educate the population on issue of gender equality.
- Carry out systematic data collection and research to define at risk and disadvantaged groups, analyse the data to make comprehensive policy, and review all related policies from a perspective of gender equality.

- Create a comprehensive policy on regional discrepancies, poverty, and unemployment to reduce human trafficking.
- Ensure that the new migration policy facilitates creation of legal migration channels to address demand in labour in low-skill sectors and prevent the exploitation of migrant workers and irregular migrants.
- Reduce demand in informal sectors. As demand has a direct impact on supply, this will contribute to countering human trafficking.
- Link the fight against trafficking for labour exploitation with the struggle for decent working conditions as well as fair recruitment policies.
- Implement a functioning and robust labour inspection system to monitor working conditions. There are currently a limited numbers of labour inspectors in Turkey. When capacity is raised, exploitation can be reduced through regular inspections.
- Continue to play a constructive and humanitarian role in major development issues in different regions. The Turkish Cooperation and Coordination Agency (TİKA) has carried out important development cooperation activities. These efforts contribute to sustainable development in the countries assisted. International migration may thus be considered from the perspective of preventing human trafficking through the economic empowerment of disadvantaged populations.
- Put in place a legal framework and policy on discrimination.
- Encourage state institutions such as Ombudsman, Human Rights Presidency to play an important role and broaden their scope to issues related to human trafficking and human security, particularly regarding protection.
- Implement policy and good governance on corruption and all forms of organized crime; essential for the efforts in fighting against human trafficking.
- Implement a framework law to combat human trafficking. The crime is currently sanctioned in the Turkish Penal Code, and there are several articles in the Criminal Procedure Code. Nevertheless, the Ministry of Interior's efforts in completing the draft and adoption of a framework law will be landmark for future efforts in fighting against human trafficking.
- Revise counter-trafficking policy to consider all forms of human trafficking, including local trafficked persons as

- well as assistance to trafficked persons, taking into account the whole range of needs in the long term.
- Restructure the NTF by establishing key thematic groups. The inter-agency cooperation mechanism is crucial in the fight against human trafficking. The Migration Policy Board's decisions will steer the policy countering human trafficking.
 - Set up a monitoring and evaluation mechanism for policy and programme as an integral part of counter-trafficking efforts.
 - Implement a new vision for Turkey to exceed the minimum international standards, as global experience shows that a minimum standards approach may cause serious human rights violations and create the perception of normalizing human trafficking.

Endnotes

- 1 Ayşe Ayata, Feride Acar, Helga Rittersberger-Tılıç, Fatma Umut Beşpınar and Kezban Çelik, “Analysis of the Demand for Different Forms of Trafficking in Human Beings in Turkey”, in International Organization for Migration (IOM), *Supporting Turkey’s Efforts to Combat Human Trafficking and Promote Access to Justice for all Trafficked Persons*, at <http://www.countertrafficking.org/media/comp5.html> [last visited 28 August 2013].
- 2 United Nations General Assembly, “Resolution adopted by the General Assembly, United Nations Global Plan of Action to Combat Trafficking in Persons (A/RES/64/293)”, at <http://www.un.org/Docs/journal/asp/ws.asp?m=A/RES/64/293>.
- 3 Ibid.
- 4 ILO 2012 Global estimate of forced labour: Women and girls represent the greater share of the total; 11.4 million (55%), as compared to 9.5 million (45%) men and boys. Adults are more affected than children; 74% (15.4 million) of victims are 18 years and above, whereas children aged 17 and under represent 26% of the total (or 5.5 million child victims)
- 5 United Nations General Assembly, “67th session of the UN General Assembly, Report of the Special Rapporteur on trafficking in persons, especially women and children (A/67/261)”, at <http://www.un.org/Docs/journal/asp/ws.asp?m=A/67/261>.
- 6 Turkey signed the UN Convention against Transnational Organized Crime and its Palermo Protocol in December 2000 and ratified on 30th of January 2003. Yet, while it signed the Council of Europe’s Convention on Action against Trafficking in Human Beings in March 2009, it has yet to ratify it.
- 7 Tier 1 countries are those whose governments fully comply with the Trafficking Victims Protection Act’s (TVPA) minimum standards. Tier 2 countries are those whose governments do not fully comply with the TVPA’s minimum standards, but are making significant efforts to bring themselves into compliance. Tier 3 countries are those whose governments do not fully comply with the minimum standards and are not making significant efforts to do so.
- 8 European Commission, “Commission Staff Working Document- Turkey Progress Report 2013”, p. 67, at http://www.avrupa.info.tr/fileadmin/Content/Files/File/key%20documents-Turkish/tr_report_2013_en.pdf [last visited 10 August 2013].
- 9 Ayata et al., Ibid.
- 10 Foreigners and International Protection Law, Law no. 6458 of 4.4.2013, O.J. 11.4.2013, 28615, at www.resmigazete.gov.tr/eskiler/2013/04/20130411-2.htm [last visited 11 August 2013].