

# INSTRUMENT FOR PRE-ACCESSION ASSISTANCE (IPA II) 2014-2020



## **Action summary**

This Action builds on the support in the Home Affairs sector provided to Turkey in previous programming years. The objective is to support and sustain the implementation of the requirements under the visa liberalisation roadmap by improving Turkey's legal and administrative framework in the field of Home Affairs in line with the EU *acquis* and EU standards.

The expected results are: revision and update of Turkey's integrated border management strategy and strategy implementation action plan in addition to increase the border surveillance capacity of Turkey in the field of integrated border management. Lastly, increase the coordination and oversight of public institutions on ethical issues in fight against corruption.

Action Identification				
Action Programme Title	Annual Action Programme for Turkey (2019)			
<b>Action Title</b>	EU Support to Home Affairs – Part 1			
Action ID	IPA 2019/042-258//Turkey/EU support to Home Affairs			
Sector Information				
IPA II Sector	Rule of Law and Fundamental Rights			
DAC Sector	15110 - Public sector policy and administrative management			
Budget				
Total cost	€ 12,000,000			
EU contribution	€ 10,650,000			
Budget line(s)	22.020301			
Management and Implementation				
Management mode	Direct management			
	Indicate management			
Dinast managements	Indirect management			
Direct management: EU Delegation	Indirect Management with entrusted entity:			
Le Delegation	Activity 1: International Centre for Migration Policy Development (ICMPD)			
	Indirect Management by the beneficiary country: Activities 2 and 3: Central Finance and Contracting Authority (CFCU)			
Indirect management:	retivities 2 and 3. Central I mance and contracting retailority (CI CO)			
National authority or other entrusted entity				
Implementation	Activity 1: International Centre for Migration Policy Development (ICMPD)			
responsibilities				
	Activities 2 and 3			
	Lead Institution: Ministry of Interior			
	Location			
Zone benefiting from the action	Turkey			
Specific implementation area(s)	Turkey			
Timeline				
Final date for concluding Financing Agreement(s) with IPA II beneficiary	At the latest on 31 December 2020			
Final date for concluding procurement and grant contracts and contribution agreements	3 years following the date of conclusion of the Financing Agreement, with the exception of cases listed under Article 114(2) of the Financial Regulation			
Final date for operational	6 years following the conclusion of the Financing Agreement			

implementation				
Final date for implementing the Financing Agreement (date by which this programme should be decommitted and closed)	12 years following the conclus	ion of the Financ	cing Agreement	
Policy objectives / Markers (DAC form)				
General policy objective		Not targeted	Significant objective	Main objective
Participation development/good governance			$\square$	
Aid to environment		$\square$		
Gender equality (including Women In Development)			$\square$	
Trade Development		$\square$		
Reproductive, Maternal, New born and child health		$\square$		
RIO Convention markers		Not targeted	Significant objective	Main objective
Biological diversity		$\square$		
Combat desertification		$\square$		
Climate change mitigation		$\square$		
Climate change adaptation		Ø		П

#### 1. RATIONALE

#### PROBLEM AND STAKEHOLDER ANALYSIS

Home Affairs is one of the most important policy areas for Turkey in the frame of the EU alignment process. The Home Affairs sub-sector is a complex one, and three priority areas can be identified as: (1) Integrated Border Management (IBM) and (2) Fight against Terrorism and Organised Crime.

## **Integrated Border Management**

There are several institutions in charge of border management activities in Turkey. The Land Forces Command is responsible for surveillance and protection of land borders, and the Coast Guard Command is responsible for surveillance and protection of sea borders. At the border crossing points, the Ministry of Trade is responsible for transition of goods and vehicles. Besides, the Turkish National Police is responsible for passport checks at the border crossing points in Turkey.

## 1.1. Border management strategy development

Within the process of 'Institution Capacity Building and Reform', border management, which is evaluated under the chapter of Freedom, Justice and Security, is regarded as being one of the key areas of the enlargement process and EU Member States attach particular importance to matters such as border controls. Border control is divided into two components: border checks and border surveillance. Border surveillance means monitoring the areas between the border crossing points (BCP) by technological and physical resources in order to prevent all cross-border crimes, including the detection of goods and persons crossing the borders illegally. Border areas in this context consist of the Green Borders (the land areas between border crossing points) and Blue Borders (coastline).

The "Strategy Paper for the Protection of External Borders" was issued in April 14, 2003, with the contributions of the representatives from institutions and agencies such as the General Staff, Ministry of Foreign Affairs, and the Ministry of Interior. As an output of the EU twinning project<sup>1</sup>, the "National Action Plan to Implement Turkey's Integrated Border Management Strategy" was drafted and agreed in 2006. However, these strategic documents need to be updated to the current migration context and the institutional and operational challenges.

The stakeholders of the aforementioned strategy development and update activity are as follows: the Directorate General of Provincial Administration, the Turkish National Police, the Gendarmerie General Command, the Coast Guard Command, the Land Forces Command, the Ministry of Trade, the Ministry of Health, the Ministry of Agriculture and Forestry, and other relevant public agencies and institutions, owing to their current and future duty connections.

Since 2006 Turkey, in line with the priorities and targets specified in the aforementioned Action Plan, has improved the quality of services and its border control and surveillance capacity, as well as its cross-border coordination capacity, in the framework of the EU IBM model. To this aim, the technical and administrative capacities of the relevant institutions responsible for border management duties have been developed with National and EU-funded activities. In 2008, the Development and Implementation Bureau for Border Management Legislation and Administrative Capacity was established under the Ministry of Interior to be in charge of various aspects related to border management. In particular, the Bureau was charged with conducting studies on the legislative and administrative structures of IBM; preparing IBM assessments; carrying out IBM projects; organising an External Borders Task Force and other such duties. Moreover, in 2015, responsibilities of the Bureau were handed over to the Directorate General of Provincial

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<sup>&</sup>lt;sup>1</sup> Support for the Development of an Action Plan to Implement Turkey's Integrated Border Management Strategy, IPA 2002

Administration under the MoI (Ministry of Interior), and soon afterwards the Bureau was renamed as the Border Management, Foreign Relations and Project Department.

The "Regulation on Cooperation and Coordination among Institutions on Border Management" that came into effect on March 17, 2016, and amended in line with the new Presidential system on February 14, 2019, is an important milestone in the adoption of the IBM concept in the country. One of the most important highlights of this Regulation is that the Integrated Border Management Coordination Board was established bringing together the most important agencies<sup>2</sup> involved in border and migration management. These Board members meet regularly in order to discuss important developments on border management and urgent topics.

Progress made so far by Turkey has ensured to some extent the alignment of the border management system with the EU Integrated Border Management system. However, the changes occurred in the public administration system and the new legislation introduced, as well as mobility at Turkish borders, resulted in a need to re-set priorities for border and migration management and a need to develop an IBM Strategy and update the Action Plan dating from 2006.

The institutional and legal reforms on IBM need to be enhanced. An update of the IBM strategy, including an Action Plan, in line with EU standards is crucial. A single structure for border management as a long-term goal is essential to structurally tackle the numerous institutional and operational challenges in this field. Clear coordination mechanisms, effective inter-agency coordination and improvement of capacities of all the existing institutions responsible for border protection/security are a matter of priority.

With this Activity, the aim is to update Turkey's integrated border management (IBM) strategy in line with the EU IBM model, through a comprehensive analysis on Turkey's green and blue borders and the capacity of relevant institutions. In this regard, alignment shall be sought with the EU IBM framework through Regulation 2016/1624on the European Border and Coast Guard (EBCGA), including its future revision(s), and the European (operational) IBM strategy, whilst naturally taking into account the specific situation of Turkey and its geographical location. Close cooperation with the EBCGA shall be relevant for the update of Turkey's EU IBM and the implementation of the Activity

The main beneficiary of the Activity will be the Turkish Ministry of Interior - General Directorate for Provincial Administration. The main beneficiary will be in charge of chairing and coordinating the Project Steering Committee meetings as well as for coordinating nominations of staff of co-beneficiary institutions for various project activities.

The stakeholders of the project will be the following institutions:

- Turkish Ministry of Interior:
  - O Directorate General for Migration Management which is responsible for policies and strategies related to migration; procedures related to foreigners' entry into, stay in, exit and removal from Turkey, international protection, temporary protection and protection of victims of human trafficking.

<sup>&</sup>lt;sup>2</sup> "The Coordination Board shall be composed of the following members under the chair of the President or Minister of the Interior:

a) Minister of Foreign Affairs

b) Minister of the Interior

c) Minister of National Defence

d) Minister of Health

e) Minister of Agriculture and Forestry

f) Minister of Trade

g) Minister of Transport and Infrastructure.

- Turkish Coast Guard which is the main authority in charge for maritime borders surveillance, maintaining maritime security, protection, implementing search, and rescue operations in Turkish maritime region.
- Turkish National Police which is in charge of travel document checks of persons entering and exiting Turkey through the border gates; performing procedures for inadmissible passengers; performing general law enforcement duties
- Turkish Gendarmerie General Command which is the first law enforcement authority that responds to the local residents needs in case of violations of public security at remote border areas and regions

## - Turkish Ministry of Defense:

- Land Forces Command which is the main authority in charge for land borders surveillance along land borders and first and second-degree military forbidden zones
- Ministry of Foreign Affairs which is responsible for coordinating all matters relating to protocols and entry of foreign delegations in Turkey;
- Ministry of Trade:
  - Directorate General for Customs and Directorate General for Customs Enforcement: Which
    hold responsibility for duties related to the entry and exit of goods as well as has the duty to
    deal with irregular migration and migrant smuggling at BCP's as one of the law enforcement
    agency.

## 1.2 Increasing border surveillance

The respect of human rights is a core fundamental principle of the European Union; Turkey as a candidate country and as a member of the Council of Europe, has an obligation to respect the highest democratic standards and practices. The EU is supporting Turkey to bring its laws, regulations and administrative capacity in line with the EU standards, including when it comes to border management.

Specifically when it comes to borders, the EU is supporting better border management and security and safety at Turkey's borders, in accordance with the EU's policies and the concept of Integrated Border Management (IBM), and better migration management, including prevention of irregular migration, cross-border crimes, including human trafficking and smuggling. This includes the provision of effective border surveillance tools for a modern border surveillance system to ensure that the border is properly managed - in the interest of safety and security of refugees, local population and ultimately Turkish and European citizens.

Due to the mixed migration flows in Turkey, improvement of the surveillance of Turkey's eastern and western borders remains relevant. Turkey's eastern borders are in a situation in which security concerns, smuggling and irregular migratory movements are intertwined with heavy climate and geographical conditions.

As stated above, border control means the surveillance of border areas and checking at border crossing points by technological or physical means in order to prevent cross-border crime, including the detection of goods and persons crossing the border illegally.

In particular of relevance for the current ongoing crisis and migratory situation, ensuring border security at the borders between Turkey and Syria by taking effective measures at the borderline leads to the change of Syrian-based irregular migration route from Syrian borders to the Turkey's Eastern borders.

The strengthening the surveillance capacity in the Eastern borders of Turkey is important for providing an efficient border management system in line with EU IBM standards.

In that regard, there are specific supply projects programmed and being conducted under previous IPA programming years (2014, 2015, 2016) such as Increasing Border Surveillance Capacity at Borders between Turkey and the EU and at Eastern Borders Phase I and II (Border Post Command Control System) by which electro-optical surveillance masts will be procured at Turkey's eastern and western borders. With the completion of the implementation period of all surveillance, mast projects (IPA 2014, 2015 and 2016), approximately 75% of Turkey's western borders and 60% of its Eastern borders will be covered by these electro-optical systems in line with European wide border surveillance system standards.

After the already extensive EU support<sup>3</sup> in previous years, which aimed to improve border security at Turkey's eastern and western borders with mentioned systems, there are some remaining needs to be covered with border surveillance equipment which will be tackled under this action.

## Fight against and Prevention of Corruption

The Council of Ethics for Public Officials (CEPO) was established in 2004 with Law No. 5176, which was followed by a Regulation to determine the ethical behavioural codes for public officials. It consists of two bodies: one is the appointed Board comprising 11 members including the Chair of the Board; the other is the staff or the personnel of the Council.

In accordance with the presidential system, CEPO went through a change after the Prime Ministry was abolished. With the legislative decree passed on July 9, 2018, CEPO's board have gained stand-alone status since they were under the Prime Ministry before the decree. Few changes in CEPO's establishment Law 5176 were made. Among those changes is the selection of the eleven Board members by the President, rather than the Council of Ministers. On the other hand, the secretarial services and the administrative support are given by the General Directorate of Labour under the Ministry of Family, Labour and Social Security.

The need to enhance integrity in public service for public officials as well as taking preventive and investigative measures to minimise corruption within the public sector are roles given primarily to CEPO. While the reputable Board members raise the profile and support for the Council's functions, institutional restrictions resulting from lack of organisational capacity and gaps in the legislation (Law No. 5176 of 2004 and Regulation enacted in 2005) are hindering the Council's ability to absolve its mission.

The limitations within the legislation and organisational mechanisms have ranged from having limited investigation scope of the public personnel, lack of full budgetary independence, not having its own personnel, lack of sanctioning mechanisms, as well as limited trained personnel with strong knowledge relevant to ethics and corruption to conduct effective investigation and monitoring.

In addition, the Council lacks adequate coordination mechanism with other integrity-related institutions, which would help conceiving a wider integrity plan for the whole public administration. The limits of oversight mechanisms also hinder appropriate lines of many ethical behaviours, such as impartiality (especially as concerns promotions and appointments), and accountability of public officials regarding the use of public resources.

There are specific supply projects programmed and being conducted under previous IPA programme years, for instance, Increasing Border Surveillance Capacity at Borders between Turkey and the EU and at Eastern Borders Phase I and II (Border Post Command Control System) amounting to more than  $\epsilon$ 200 million in supplies only under IPA 2013-2016.

The legislative and institutional gaps identified above must be tackled if we want to have a more efficient service oriented body, with a stronger institutional structure, able to embed ethical culture within the society in general, and especially after political system transition.

The proposed action will provide an overall advancement of CEPO that remains solely responsible to convey and embed ethical culture and minimise corruption, not only for public officials but society in general. The lack of such action will very likely escalate the already existing criticisms by the EU and other international organisations to the Council in terms of its organisational inefficiencies and weak legislative scope. Most importantly, ethical standards of public officials and the society in general may eventually decline with an absence of such action.

As regards anti-corruption, benchmark 42 of the visa liberalization framework is important: *Continue implementing the National Strategy and the Action Plan on Fight against Corruption and the recommendations of GRECO (I, II and III. Evaluation Round)*. In particular, Turkey needs to follow up on the recommendations of the Council of Europe's Assembly of the Group of States against Corruption. The Law on Parliamentary Ethics and the Law on Political Parties, including draft provisions on political financing, including the indicative timeline are expected to be adopted in the framework of the Visa Liberalization Dialogue and need possible support.

#### **OUTLINE OF IPA II ASSISTANCE**

Under *Activity 1*, an IBM Strategy will be developed and the current "National Action Plan to Implement Turkey's Integrated Border Management Strategy" will be updated in line with the EU IBM principles, as referred to above. Close cooperation and coordination with the EBCGA is recommended, for example through the provision of (available) strategic trainings concepts.

Regarding *Activity 2*, the border surveillance capacity of Turkey's Eastern and Western Borders will be modernised. This activity is the continuation of the already signed contracts under 2014, 2015 and 2016 Financing Agreements.

Finally, *Activity 3* will contribute to tackling corruption and provide an overall improvement of ethical environment of Turkey by increasing CEPO's organisational capacity that is solely responsible to convey and embed ethical culture for not only public officials but also the society in general. The main expected results of the activity are implementation of legislative gap analysis and need assessments, preparation of a draft legislation for the amendment of CEPO's current law, establishment of an oversight and coordination mechanism for CEPO, training of CEPO staff on oversight, investigation, and professional trainings, training of public officials on ethics through different delivery mechanisms.

### RELEVANCE WITH THE IPA II STRATEGY PAPER AND OTHER KEY REFERENCES

The Home Affairs sub-sector includes alignment activities mainly related with Chapter 24 Justice, Freedom and Security. Home Affairs is another key area for financial assistance, which is directly relevant to the European Agenda on Migration. Support in this sector complements other funding instruments, such as the Facility for Refugees in Turkey, by focussing on the continued development of long-term sustainable strategies and policies.

In line with the main objective, the Action will especially support: (1) improving the legal and administrative infrastructures in the field of migration and asylum in line with EU standards to effectively manage migration flows and (2) achieving substantial progress in implementing institutional reform on integrated border management (IBM) via enhancement of technical and personnel capacity of borders and interagency coordination.

Alignment with the EU acquis is important for the implementation of the Actions. For example, relevant in this regard is Regulation 2016/1624on the European Border and Coast Guard (EBCGA), including its future revision(s) and EU policy on IBM

According to the **Schengen Catalogue**, Border surveillance should be assessed using two key parameters which are **situational awareness and reaction capability**.

- Situational awareness measures the level at which the units can detect ongoing or already accomplished unlawful border crossings (or smuggling activities) throughout the relevant planning period. This shows the requirements at tactical level (monitoring times and areas, detection rate, identification methods and profiling of targets). Also, the number and direction of patrols along blue and green borders is relevant.

In order to fully comply with Schengen requirements in relation to border surveillance of land borders, the capacity of Turkey to control its Western borders should be increased in terms of monitoring and patrolling through the supply of surveillance vehicles, equipment and construction of surveillance towers and command centres.

## Link with National Action Plan for EU Accession Phase-II (June 2015 –June 2019)

Key objective addressed National Action Plan for EU Accession Phase-II June 2015 –June 2019: Enhancing the international cooperation as an element of EU Integrated Border Management Policy.

## Link with the Strategic Plan of the Ministry of Interior (2015-2019)

In the field of integrated border management,

- A border security organisation will be set up under Ministry of Interior
- Surveillance and control capacity will be increased in blue and green borders and border crossing points within the support of the projects, to be funded from EU and national sources,
- A modern and technological border security system will be established in green and blue borders.

## Regulation on Cooperation and Coordination among Institutions on Border Management

The "Regulation on Cooperation and Coordination among Institutions on Border Management" that came into effect on March 17, 2016 was amended in line with the new Presidential system on February 14, 2019. The following functions relating to border management shall be executed and coordinated by the DG of Provincial Administration;

- Ensure necessary coordination relating to border management among public entities in line with the policies and strategies formulated by the Coordination Board;
- Ensure cooperation and coordination among the relevant public entities in ensuring security at civilian airports, ports and border gates;
- Coordinate, in line with the decisions of the Implementation Board, the acts and actions relating to addressing the issues and ambiguities arising among public entities in implementing the legislation on civilian airports, ports and border gates;
- Develop proposals to create the necessary legal and institutional structure for border management;
- Execute and coordinate the tasks assigned to the Ministry of Interior on border management and projects and investment activities associated with such tasks;
- Follow up and coordinate the acts and actions, as the national focal point, on matters of border management with European Union agencies, other countries and international organizations;

- Discharge as prescribed by the legislation the functions relating to border physical security systems and border lighting; ensure coordination between provincial governorships and the relevant public entities on the investment in this matter.

## Fight against and Prevention of Corruption

With reference to the Commission's Turkey 2018 Report statement on "no progress in addressing the many gaps in the Turkish anti-corruption framework was achieved", the Activity will generate a comprehensive approach for an overall accountability system at public sector via a coordinating body with all other integrity related institutions as well as an oversight mechanism at public institutions for unethical or corrupt behaviour.

The same report underlies the prevalence of discrimination, hate speech against minorities, hate crime etc. As pointed out in section 12 of this document, the role of CEPO in the area of public sector specifically aims to protect vulnerable groups and hold unethical public officials accountable who conduct unethical acts.

The fight against corruption and promotion of ethics are addressed in IPA II, under the Sector "Democracy and Governance." The revised *IPA II Country Strategy Paper* (ISP) states in particular that Turkey needed to "step up its anti-corruption efforts and measures, strengthening both preventive and repressive standards as part of improving its anti-corruption policy development and implementation". The ISP is aligned to the general requirements set out in the relevant Chapter of the accession negotiations for Turkey. The Activity will meet these goals by strengthening CEPO's role in fight against corruption.

The Activity, by strengthening CEPO's role on combating corruption and embedding ethics will also answer the 2018 IPA report of *European Court of Auditors* which stated that IPA I objectives have barely addressed some fundamental needs: ...justice, the fight against high level corruption and organised crime..." (p. 5).

In addition, Transparency International records of Corruption Perception Index measuring the corruption level of public sector states a drop since 2010 records from 2012 which scored 49 points and 50 points out of 100 in 2013 to 41 points in 2018.

This ranking, aside of indicating a loss of trust of the business sector and general public towards the public sector, also suggests that there is be a dire need to strengthen integrity related public sector bodies, including CEPO, Ombudsman, and Court of Accounts.

As regards anti-corruption, reference to the visa liberalization benchmarks is important, and in particular as regards support in addressing the benchmark 42: Continue implementing the National Strategy and the Action Plan on Fight against Corruption and the recommendations of GRECO (I, II and III. Evaluation Round).

#### LESSONS LEARNED AND LINK TO PREVIOUS FINANCIAL ASSISTANCE

#### *In the field of integrated border management*

The EBCGA is implementing a capacity building project (Regional Support to Protection-Sensitive Migration Management in the Western Balkans and Turkey, Phase II, under IPA) in Turkey, along with three other partners (EASO, UNHCR, IOM), for a three year period (July 2019-June 2021) and a total amount of 6.475 million EUR. Cooperation with the EBCGA is important in this regard.

A European training concept on IBM has been developed and will be delivered to Western Balkan countries. Capitalising on the thematic evaluation of the national strategies on IBM of the EU Member States, Turkey can be further supported. Duplication of efforts shall be avoided and close coordination between relevant institutions and agencies in Turkey and the EU shall be sought.

With previous projects, the awareness of relevant institutions regarding the importance of an integrated border management concept is high.

The provision of effective border surveillance tools for a modern border surveillance system is to ensure that the border is properly managed - in the interest of safety and security of refugees, local population and ultimately Turkish and European citizens. In this regard, a variety of IBM projects have been funded under previous IPA-I and IPA-II programming years which are briefly described as follows; 82 surveillance vehicles delivered to Land Forces Command's (LFC) eastern border units (IPA 2011 and 2012), 57 surveillance vehicles to be delivered to LFC's western border units (IPA 2013 and 2014), 278 thermal cameras to be procured and delivered to LFC's southern units (IPA 2016), 3649 passport exit-entry stamps procured and being used at all border gates by Turkish National Police (IPA 2014), hardware and software equipment for NACORAC to be procured (IPA 2014), and 211 communication and observation masts (70 at the Western border, 141 at the Iranian/Armenian/Azeri border), including 129 command shelters (43 at the Western border, 86 at the Iranian/Armenian/Azeri border) to be established (IPA 2014, 2015 and 2016). Besides, as for the equipment that have been procured for the use of Ministry of Trade (DG Customs Enforcement); 4 patrol boats, vehicles, 50 sniffer dogs, 6 x-ray scanners, detection devices for narcotics and chemicals (IPA 2014), 5 backscatter vans (vans with special x-ray scanners). Activity 3 will ensure the sustainability of previous interventions by ensuring that equipment is provided in the relevant parts of the borders where they are still missing.

Technical equipment was provided to institutions related with border management (Land Forces Command, Ministry of Trade (DG Customs Enforcement), Gendarmerie General Command, Turkish National Police and Coast Guard Command); moreover, training programs were realised for border staff from relevant institutions. Thus, institutional capacity has been increased and similarly, there are projects ongoing.

Activity 1 will be complementary to the previously accepted projects such as "Increasing Border Surveillance Capacity at Borders between Turkey and the EU (IPA 2014 Programme)" and "Increasing Border Surveillance Capacity at Turkey's Eastern Borders (IPA 2015 & 2016 Programmes)".

Activity 1 will develop a Border Management Strategy, revise and update the outputs and outcomes of previous projects such as "TR 02 JH 02 Support for the Development of an Action Plan to implement Turkey's Integrated Border Management Strategy", "TR 07 IB JH 04 Action Plan on Integrated Border Management-Phase 1" and "TR 07 IB JH 04 Action Plan on Integrated Border Management-Phase 2".

## Fight against Corruption

Regarding *Activity 3*, Since CEPO's establishment in 2004, the Council conducted four EU funded projects. Currently, CEPO has started to implement its fifth EU funded project on developing ethical culture at local governments. All previous projects, except one (2012-2014 titled "Consolidating Ethics in the Public Sector") assisted to develop an overall ethical environment within public institutions. Activities were related to ethical trainings, setting up monitoring tools, visibility materials, developing ethical codes for specific professionals for more enhanced ethical awareness. This proposed action therefore differs from its predecessors in the sense that it focuses on developing the capacity and identifying the needs of the Council in order to promote ethical culture not only at public institutions but also in the wider society.

The Council now has the adequate knowledge learned from previous projects; therefore, it will avoid mistakes, repetitions and waste of resources (such as publishing hundreds of posters). In addition, the Beneficiary will effectively own the project by promoting it at the Presidential level while ensuring that stakeholders are significantly involved.

## 2. INTERVENTION LOGIC

## LOGICAL FRAMEWORK MATRIX

OVERALL OBJECTIVE (impact)	OBJECTIVELY VERIFIABLE INDICATORS (*)	SOURCES OF VERIFICATION	
To support better alignment regarding Chapter 24, justice, freedom and security	Progress made towards meeting accession criteria.	DG NEAR – Turkey Report Administrative reports of the public institutions in Turkey	
SPECIFIC OBJECTIVE(S) (outcomes)	OBJECTIVELY VERIFIABLE INDICATORS (*)	SOURCES OF VERIFICATION	ASSUMPTIONS
For Activity 1 and 2 To improve integrated border management, in line with EU standards and EU acquis	Cases of illegal border crossings reduced  Improved inter-institutional cooperation and institutional efficiency	Administrative reports of DG Provincial Administrations Turkish Land Forces Statistics	Institutions remain dedicated to the harmonisation of the legislation with EU and international standards, especially in the area of social cohesion.
For Activity 3 To enhance fight against corruption	Reduction in anti-corruption cases in the public domain  Improved behaviour on ethics within the public domain	Reports of external actors, such as Transparency International.  Reports and analyses of the to be established oversight commission at CEPO with a corruption index and relevant data on ethics cases  Identification of increase in	
RESULTS (outputs)		knowledge through data of the e-based learning system for public officials	ASSUMPTIONS
Result 1: Current Integrated Border Management Strategy and Strategy	OBJECTIVELY VERIFIABLE INDICATORS (*)  R.1.1 Revised IBM strategy	SOURCES OF VERIFICATION  Commission country report	ASSUMPTIONS
Implementation Action Plan are reviewed and updated.	R.1.2 Revised IBM Action Plan	Project reports ICMPD reports Reports Frontex and other	The Turkish Government remains committed to addressing social cohesion

Result 2: Border surveillance and fight against irregular migration capacity at Turkey's Eastern and Western borders are increased	R.2. Length of border area covered by modernised surveillance system at Eastern and Western borders	relevant EU institutions, and EU Member State border management actors  Project reports Statistical reports of DG of Provincial Administrations EU progress reports	issues and to implement measures to promote the inclusion of migrants in Turkish society.
Result 3: The management capacity of CEPO on coordination and oversight of the public institutions on ethical issues is increased	R.3.1. Number of meetings organised by CEPO with other relevant organisations on Ethics  R.3.2. Number of CEPO staff  R.3.3. Oversight and coordination mechanism in CEPO  R.3.4. Number of use of electronic-based (E-base) based learning tools on ethics for public officials  R.3.5. Number of use of E-based learning and information tools for the wider public	Project reports  Statistics and annual reports of CEPO  Intermediate and final project reports on the twinning project including reporting through EU Member States	

<sup>(\*\*) (\*\*\*) (\*\*\*\*)</sup> 

<sup>(\*)</sup> All indicators should be formulated as measurement, without specifying targets in the Logical Framework Matrix. The targets should be included in the performance measurement table in section 4. More detailed guidance on indicators is provided in Section 4 on performance measurement.

<sup>(\*\*)</sup> Relevant activities have to be included only in the following sub-section.

<sup>(\*\*\*)</sup> During the inception period, indicators and sources of verification may be specified and adapted for optimal implementation purposes and accurate verification. (\*\*\*\*) All data should be disaggregated on the basis of gender, age and nationality, where applicable and possible.

#### **DESCRIPTION OF ACTIVITIES**

## Activity 1- Drafting of a National IBM Strategy and Updating of the "National Action Plan to Implement Turkey's IBM Strategy"

The activity aims to prepare an Action plan following the drafting of an IBM Strategy, in line with EU IBM legislation, strategies and approaches including the Schengen *acquis*. With this Activity, below studies will be implemented:

- Review of the relevant legislative framework, strategy documents and border-related laws in the light of IBM model of the EU and its best practices.
- Gap Analysis & Needs Analysis on Turkey's borders and technical and administrative capacities of
  relevant agencies, including the quality and efficiency of their intra-agency coordination, the
  coordination among these institutions and cross-border coordination with regional countries and
  international organisations, and a comparison study on Turkey and EU IBM model.
- Preparation of a National IBM Strategy and an updated National Action Plan in coordination with relevant bodies.

Cooperation with the European Border and Coast Guard (EBCGA) is relevant for the implementation of the activity.

**Indicative EU Contribution:** € 2.000.000

## Activity 2- Increasing Border Surveillance Capacity at Turkey's Eastern and Western Borders Phase 3

The activity aims to support border security through modernisation of border surveillance system and contribute to the prevention of illegal migration, human trafficking, cross-border crimes, smuggling and to ensure further development and implementation of border management and standards in line with EU's IBM policies and strategies. With this Activity, equipment such as surveillance masts (radar masts, communication masts and internal / external electro-optical masts), shelter units, field sensor systems and system rooms (list is indicative) will be procured for closing the remaining supply gaps in relation to previous EU support provided.

With the completion of the implementation period of all surveillance mast projects (IPA 2014, 2015 and 2016), 211 communication and observation masts (70 at the Western border, 141 at the Iranian/Armenian/Azeri border), including 129 command shelters (43 at the Western border, 86 at the Iranian/Armenian/Azeri border- IPA 2014, 2015 and 2016) will be established and approximately 75% of Turkey's western borders and 60% of its eastern borders will be covered by these electro-optical systems. This activity will ensure that the remaining missing equipment is procured and that all the border is properly covered.

**Indicative EU Contribution:** € 7.650.000

## Activity 3- Strengthening the Institutional Capacity of the Council of Ethics for Public Officials (CEPO)

The activity aims to enhance institutional capacity of the Council of Ethics for Public Officials (CEPO) in accordance with European Union and other international standards to increase its performance in management and empower its human resources to meet its organisational goals.

Within this activity, the following actions are envisaged:

- Gap analysis and need assessment including a corruption risk assessment for the amendment of CEPO's current law to propose newly drafted / amended legislation,
- Preparation of draft legislation,
- Establishment of coordination mechanism with related public institutions' disciplinary board and ethics commissions as well as relevant NGOs via workshops / seminars,
- Establishment of an "oversight mechanism" at CEPO for monitoring and ensure ethical codes in public institutions are implemented,
- Establishment of an e-based learning system for public officials at central government,
- One study visit to international organisations and similar institutions like CEPO,
- Creation of the follow up/monitoring mechanism for the decisions taken by the board,
- Impact assessment of the previous CEPO decisions for public officials that will feed into new draft legislation,
- Trainings for CEPO Staff on investigation methods etc.
- Review of organigram of CEPO for better implementation of tasks,
- Conducting a work load analysis,
- Review of the process analysis,
- Review of the HR strategy,
- Conduct training need analysis for CEPO staff.

**Indicative EU contribution:** € 1.000.000

## Risks

In terms of activity 1, the risk could be insufficient cooperation between the various stakeholders involved, in particular relevant for the numerous actors engaged in border management.

In terms of Activity 2, there might be some risks of implementation due to Turkey's Eastern Borders mountainous area. For instance, rough landforms and dire conditions might hamper the activities.

Regarding Activity 3, a minor risk could be the end of Board members terms (who are assigned for four years by the President) while the project is being implemented. This risk will be eliminated by the e-learning module for new comers. Another risk could be the insufficient commitment of public institutions' ethics commissions and disciplinary boards in their willingness to cooperate and share information of ethical violations. This risk is expected to be mitigated due to recent reiterations of commitment made by public officials at all levels to fight against corruption and promote ethical culture. CEPO's experiences seen at Ethics Platform meetings or other organised events/legislation/decrees to prevent corruption demonstrated that public officials are becoming more aware of ethics and therefore will commit to such cooperation with CEPO.

## **CONDITIONS FOR IMPLEMENTATION**

IN GENERAL FOR ALL ACTIVITIES: The implementation of the action requires continued commitment by the Turkish authorities to achieve the actions objectives and expected results as well as sufficient and stable staffing of the beneficiary institutions.

In particular for activity 1, a clear cooperation mechanism needs to be in place before the start of the action, involving the various stakeholders involved in IBM to ensure a smooth preparation of the IBM strategy and a revised Action Plan and follow-up implementation including, where necessary, institutional changes.

For activity 3, the authorities will facilitate the establishment of a coordination mechanism across institutions, led by the CEPO; the Resident Twinning Advisor will have access to the necessary information (IT systems, legal acts, etc.) in order to perform his/her functions within the premise of CEPO.

#### 3. IMPLEMENTATION ARRANGEMENTS

#### **ROLES AND RESPONSIBILITIES**

The Ministry of Interior is the Lead Institution for implementation of this Action.

The Operating Structure responsible for the execution of the actions is the CFCU (as Contracting Authority) and the Ministry of Interior (as Lead Institution)

## Activity 1- Drafting of a National IBM Strategy and updating of the "National Action Plan to Implement Turkey's IBM Strategy"

Main Beneficiary: MoI-Directorate General for Provincial Administration (Department of Border Management, Foreign Affairs and Project);

Co-beneficiaries of the project; the Turkish National Police, the Gendarmerie General Command, the Coast Guard Command, the Land Forces Command, the Ministry of Trade, the Ministry of Health, the Ministry of Agriculture and Forestry.

## Activity 2- Increasing Border Surveillance Capacity at Turkey's Eastern and Western Borders Phase 3

Main Beneficiary: MoI-Directorate General for Provincial Administration (Department of Border Management, Foreign Affairs and Project); Co-beneficiary: Ministry of National Defence (Land Forces Command)

## **Activity 3- Increasing the Institutional Capacity of the Council of Ethics for Public Officials (CEPO)**

Main Beneficiary: The Council of Ethics for Public Officials.

The following groups are considered as stakeholders: within the Office of Presidency: Board of Policy of Law and General Directorate of Law and Legislation. At the central level, Government Institutions (Relevant to Integrity and/or Preventing Corruption): Ministry of Interior, Ombudsman, National Human Rights and Equality Institution, Ministry of Justice, Internal Control Units with Public Agencies, Turkish National Police, Department of Anti-Smuggling and Organised Crime, Governorates and district governorates, Financial Crimes Investigation Board. Internationally acclaimed organisations relevant to integrity: There are various internationally well-known key institutions to embed ethics and prevent corruption. Some include GRECO, Transparency International, OECD, Anti-Corruption Network for Eastern Europe and Central Asia and the European Commission Anti-Fraud Office.

## IMPLEMENTATION METHOD(S) AND TYPE(S) OF FINANCING

**Activity 1** will be implemented via indirect management with ICMPD. <u>The Contracting authority will be the European Commission through the EU Delegation to Turkey.</u>

Activity 2 will be implemented via 1 supply tender. The Contracting Authority will be the CFCU.

Activity 3 will be implemented via Twinning. The Contracting Authority will be the CFCU.

#### 4. PERFORMANCE MEASUREMENT

## **METHODOLOGY FOR MONITORING (AND EVALUATION)**

The overall implementation of IPA assistance in Turkey is subject to monitoring in accordance with the Article 18(1) of the IPA II IR. This implies setting specific monitoring committees which mandates must be formally defined and agreed upon with the EC.

During the implementation of the IPA-II period, monitoring is conducted via various levels of monitoring committees' tools. In this respect, a Monitoring Committee, which convenes twice a year and is co-chaired by the NIPAC and representatives of the EC will be in place. In addition to this, in the IPA-II period, lead institutions are responsible from establishing sector level monitoring by policy area or by program six months after the entry into force of the Financing Agreement.

The meetings will be held twice a year and are composed of representatives from Ministry of Foreign Affairs Directorate of EU, NAO, CFCU, European Commission, the lead institution of the sector/sub-sector and representatives of beneficiary institutions, donor institutions and NGOs. Participation of other stakeholders will be ensured when deemed necessary.

As for the Home Affairs sub-sector, monitoring meetings will be organised by MoI and will include discussions on relevant strategies and constitute a link between implementation and further programming phases.

As for the activity level monitoring, Project Steering Committees (PSC) will be established for this purpose. PSC meets at least quarterly or more frequently where relevant as per request of the members, to monitor the implementation of the project, achievement of results against indicators in the Action Document, and to agree on corrective actions as appropriate. The conclusions of the Steering Committee meetings will be agreed by all participants in the minutes of the meetings.

The Steering Committees will be composed of the representatives of project beneficiaries, the lead institution of the sub-sector, Ministry of Foreign Affairs Directorate for EU Affairs, Ministry of Treasury and Finance, Central Finance & Contracts Unit, the EU Delegation to Turkey as well as civil society. Participation of other stakeholders will be ensured when deemed necessary.

#### Evaluation arrangements:

In line with the IPA II Implementing Regulation 447/2014, an IPA II beneficiary who has been entrusted budget implementation tasks of IPA II assistance shall be responsible for conducting evaluations of the programmes it manages.

The European Commission will carry out a mid-term, a final or an ex-post evaluation for this Action or its components (activities) via independent consultants, through a joint mission or via an implementing partner (see above).

The evaluations will be carried out as prescribed by the DG NEAR Guidelines on linking planning/programming, monitoring and evaluation<sup>4</sup> and in particular for the evaluation of capacity building activities DG NEAR Guidance note "Addressing capacity development in planning/programming, monitoring and evaluation"<sup>5</sup>

In addition, the Action or its components (activities) might be subject to external result oriented monitoring in line with the European Commission rules and procedures set in the Financing Agreement.

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<sup>&</sup>lt;sup>4</sup> https://ec.europa.eu/neighbourhood-enlargement/tenders/monitoring-and-evaluation\_en

https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/dg\_near\_guidance\_note -\_addressing\_capacity\_development\_in\_programming\_me.pdf

## **INDICATOR MEASUREMENT (5)**

Indicator	Baseline (value + year) (2)	Target (3)	Final Target (2023) (4)	Source of information
Progress made towards meeting accession criteria	n/a	n/a		DG NEAR
Integrated Border Management				
Turkey's IBM Strategy and National Implementation Action Plan (Activity 1)	Non-existing, out-of- date (2019)	Drafted, updated	Drafted, updated (2023)	Project reports Statistical reports of DG of Provincial Administrations EU progress reports IBM Strategy Implementation Action Plan of IBM Strategy
Km of border area covered by modernised surveillance system at Eastern and Western Borders (Activity 2)	0 (2019)	70	70 (2023)	Project reports Statistical reports of DG of Provincial Administrations EU progress reports
Fight against Corruption  Preparation of a draft legislation for the amendment of CEPO's current law (Activity 3)	Not exist (2019)	Exist	Exist (2022)	Project reports CEPOs statistical reports International organizations reports on the legal framework on anticorruption
Establishment of an oversight and coordination mechanism for CEPO (Activity 3)	Not in place and functional (2019)	In place and functional	In place and functional (2022)	Project reports CEPOs statistical reports

<sup>(1)</sup> This is the related indicator as included in the Indicative Strategy Paper (for reference only)

- (2) The agreed baseline year is 2010 (to be inserted in brackets in the top row). If for the chosen indicator, there are no available data for 2010, it is advisable to refer to the following years 2011, 2012. The year of reference may not be the same either for all indicators selected due to a lack of data availability; in this case, the year should then be inserted in each cell in brackets. The baseline value may be "0" (i.e. no reference values are available as the Action represents a novelty for the beneficiary) but cannot be left empty or include references such as "N/A" or "will be determined later".
- (3) The target year CANNOT be modified.
- (4) This will be a useful reference to continue measuring the outcome of IPA II support beyond the 2014-2020 multi-annual financial period. If the Action is completed before 2020 (year for the performance reward), this value and that in the 2020 target column must be the same.
- (5) During the inception period, indicators and sources of verification may be specified and adapted for optimal implementation purposes and accurate verification.

## 5. SECTOR APPROACH ASSESSMENT

Due to various but inter linked issues in the area of Justice, Freedom and Security, a number of different national strategies and action plans are in force.

The 10<sup>th</sup> National Development Plan foresees a cooperation mechanism will be set among institutions providing public security services in order to ensure an integrated and effective system. Internal security is also covered in 10<sup>th</sup> Development Plan: it is aimed to strengthen security services and establish a secure business and living environment in Turkey.

National Action Plan towards the implementation of Turkey's Integrated Border Management Strategy foresees the establishment of an integrated border management system in line with EU standards and to perform duties related to security of borders.

The Ministry of Interior (MoI) is the lead institution of the sub-sector with its affiliated bodies and central institutions and is responsible for the overall coordination, programming and monitoring-evaluation of the activities in the sub-sector through the Department of EU Affairs and Foreign Relations. Programming activities have been coordinated by the IPA Unit of the lead institution and Technical Level Working Groups have been organized for the preparation of the Annual Action Programmes. In addition to this, CFCU serves as the Contracting Authority to fulfil the duties arising from tendering, contract management and financial management of the projects.

Key institutions which are mainly implementing projects in the sub-sector are: DG of Migration Management (MoI), DG of Provincial Administrations Border Management, Foreign Affairs and Project Department, Turkish National Police, Turkish General Staff, Turkish Gendarmerie General Command, Turkish Coast Guard Command, Ministry of Trade (MoT), Ministry of National Education, Ministry of Health and Ministry of Justice (MoJ).

In terms of monitoring of EU funds under the IPA structure, monitoring and evaluation units were established by the Prime Ministry Circular No. 2009/18. Monitoring is conducted via various levels of monitoring committees' tools. In this respect, a Monitoring Committee, which convenes once a year and is co-chaired by the NIPAC and representatives of the EC will be in place.

Concerning sub-action level monitoring, taking due note of the coherence between the existing structure and the content of this Sector Planning Document, SMSCs will serve for monitoring the implementation of national sector /sub-sector strategies in Home Affairs Sub-sector. The Sector Monitoring Meetings will be held twice in a year with the participation of Ministry of Interior, Ministry of Foreign Affairs Directorate for EU Affairs, Ministry of Justice and other relevant key institutions as well as the Central Finance and Contracting Unit, EU Delegation. These meetings should also include discussions on relevant strategies and constitute a link between implementation and programming.

Turkey has a multi-annual budgeting system which is defined in the Public Financial Management and Control (PFMC) Law no.5018. The law requires the annually preparation of the Medium Term Programme (MTP) Moreover, Medium Term Fiscal Plans (MTFP) is developed by The Presidency of Strategy and Budget in coordination with Ministry of Treasury and Finance in line with Medium Term Programme. By this law, it is aimed to ensure that the public institutions develop their own strategic plans and budget on the basis of their performance programs prepared in line with the national plans. These documents take into account EU accession requirements as well.

### 6. CROSS-CUTTING ISSUES

#### **GENDER MAINSTREAMING**

Equal participation of women and men is taken into consideration and secured in the design of this Home Affairs Action. Based on fundamental principles of promoting equality and combating discrimination, participation to the activities will be guaranteed on the basis of equal access.

Regarding to Activity 3 has a twinning contract for the training of the expert staff and personnel. The beneficiary institutions will pay special attention to assure the maximum participation of women in the projects. Throughout the implementation of the Activity, CEPO will make sure that both men and women benefit equally from the planned activities to ensure their equal participation. In practice, CEPO will especially pay particular attention to equal composition of women and men participating to workshops, training activities, and study visit.

#### **EQUAL OPPORTUNITIES**

The Home Affairs sub-sector aims at a meaningful participation of all individuals, both men and women in the design, implementation, monitoring and evaluation of all our operations and programmes. To implement this commitment, the participation level of men and women in training sessions and similar activities will be documented for monitoring purposes at the level of Steering Committees.

Equal opportunity principles and practices in ensuring equitable gender participation in this Action will be guaranteed. Male and female participation in the Activities will be based on EU standards and assured by official announcements published to recruit the necessary staff for the Activities. The main criteria for recruitment will be qualifications and experience in similar projects, not sex or age. Both men and women will have equal opportunities and salaries

Appropriate professional qualifications and experience will be the factors for personnel recruitment and evaluation. When recruiting personnel for this Action, there will be made no distinction based on sex, race, or religion.

### **MINORITIES AND VULNERABLE GROUPS**

According to the Turkish Constitutional System, the word minority encompasses only groups of persons defined and recognised as such on the basis of multilateral or bilateral instruments to which Turkey is a party.

## **ENGAGEMENT WITH CIVIL SOCIETY (AND IF RELEVANT OTHER NON-STATE STAKEHOLDERS)**

Some of the activities under the 2019 Home Affairs Action include the participation of CSOs. Besides the proposed activities in this Action Programme, *Activity 4*, the Council of Ethics pays great attention to civil society and its stakeholders to embed ethical standards. All civil society stakeholders are believed to be able to bring their experiences and knowledge to the implementation of the project. Their presence will be secured in related activities. A mechanism called "Ethics Platform" established in 2013 by CEPO already includes more than fifteen NGOs and all central public institutions (refer to CEPO's website for detailed information). It extends its membership every year. Ethics Platform meets twice every year and discusses the developments on issues of prevention of corruption and embedding ethics. Meetings are grounds for NGOs and public institutions to cooperate and assist each other on integrity issues. Therefore, the Action will already have bases and network with NGOs relevant to integrity.

## **ENVIRONMENT AND CLIMATE CHANGE (AND IF RELEVANT DISASTER RESILIENCE)**

The activities under this Action are envisaged not to have any negative effects on the environment or on climate change.

#### 7. SUSTAINABILITY

With respect to Activity 1 Implementation of the IBM Strategy and Action Plan, the coordination mechanisms among the relevant border-related institutions, which are integral part of the IBM model have been strengthened and are functioning efficiently, especially with the adoption of the "Regulation on Cooperation and Coordination among Institutions on Border Management", and establishment of the related Boards (Coordination and Implementation Boards which are composed of the decision-maker representatives from related institutions/stakeholders). In this regard, based on the findings and results of the activity (developed strategy and updated action plan), an effective Integrated Border Management agenda will be further pursued under the supervision and guidance of abovementioned Boards. This should ensure sustainability of the new IBM strategy and action plan after the end of the project.

With respect to *Activity 2* the equipment to be procured border surveillance capacity of the institution responsible from border surveillance (Turkish Land Forces Command) will be enhanced and fight against irregular migration, human trafficking, and other cross-border crimes will be carried out in a modernised and more effective manner. All equipment, material procured and know-how accumulated within these activities will be complementary to existing border surveillance systems and equipment.

Activity 3 is designed such a way that it will ensure to increase the capacity in different areas including organisational, legal, and human resources. For example, legislation and/or amendments to existing Law No. 5176 when implemented will sustain after the lifespan of the project. Coordination mechanisms with other public institutions' ethics commissions and disciplinary boards, once established will contribute to overall effective fight against corruption and prevention of unethical behaviour.

In addition to increasing its own capacity, an e-learning system will serve CEPO's main purpose of increasing ethical awareness and teaching ethical standards to as many public officials. Overall, CEPO will ensure the effective continuation of achievements of the Action.

## 8. COMMUNICATION AND VISIBILITY

Communication and visibility will be given high importance during the implementation of the Action. The implementation of the communication activities shall be funded from the amounts allocated to the Action. All necessary measures will be taken to publicise the fact that the Action has received funding from the EU in line with the Communication and Visibility Manual for EU External Actions. Additional Visibility Guidelines developed by the European Commission (DG NEAR) will have to be followed.

Visibility and communication actions shall demonstrate how the intervention contributes to the agreed programme objectives and the accession process. Actions shall be aimed at strengthening general public awareness and support of interventions financed and the objectives pursued. The actions shall aim at highlighting to the relevant target audiences the added value and impact of the EU's interventions and will promote transparency and accountability on the use of funds.

It is the responsibility of the beneficiary to keep the Commission fully informed of the planning and implementation of the specific visibility and communication activities.

The beneficiary shall report on its visibility and communication actions in the report submitted to the IPA monitoring committee and the sectorial monitoring committee.

All projects /contract implemented under this programme shall comply with the **Visibility Guidelines for European Commission Projects in Turkey** published by the EUD to Turkey, at <a href="http://www.upa.info.tr/AB\_Mali\_Destegi/Gorunurluk,Visi.html">http://www.upa.info.tr/AB\_Mali\_Destegi/Gorunurluk,Visi.html</a>.

All communication and visibility activities should be carried out in close co-operation with the CFCU and the EUD to Ankara. The CFCU and the EUD are the main authorities in charge of reviewing and approving visibility-related materials and activities.

The EU-Turkey cooperation logo should be accompanied by the following text: "This project is co-funded by the European Union."

Whether used in the form of the EU-Turkey cooperation logo for information materials or separately at events, the EU and Turkish flag have to enjoy at least double prominence each, both in terms of size and placement in relation to other displayed logos and should appear on all materials and at all events as per the Communication and Visibility Manual for European Union External Actions. At visibility events, the Turkish and the EU flag have to be displayed prominently and separately from any logos.

Logos of the beneficiary institution and the CFCU should be clearly separated from the EU-Turkey partnership logo and be maximum half the size of each flag. The logos will not be accompanied by any text. The CFCU and beneficiary logo will be on the lower left-hand corner and lower right-hand corner respectively. The consultant logo with the same size will be in the middle of the CFCU and beneficiary logo. If the consultant is a consortium, only the logo of the consortium leader will be displayed.

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