Support to the National Asylum System through Strengthened Registration as the Gateway to Protection – II

Key results: Registration efforts of the Turkish asylum agency, Presidency of Migration Management (PMM) supported

- *Provision of capacity development support to enhance PMM's registration efforts*
- *Assistance for the identification and referral of persons with specific needs*

Justification for support:

- Follow-up to phase one of DK funded project "Support to the National Asylum System thorugh Strenghtened Registration as the Gateway to Protection" based on milestones achieved and expansion of present project objectives to contribute the overall cooperation of UNHCR Türkiye with the Turkish Presidency of Migration Management (PMM).

Major risks and challenges:

Main assumptions:

- *The political and operational environment continues to be favourable to UNHCR's and partners' work.*
- *All partners, including national authorities and NGOs, continue to work closely with UNHCR for the implementation of the proposed activities.*
- *There are no major and/ or abrupt influx or outflux of refugees and asylum-seekers, and no major reduction of resettlement quotas and complementary pathways opportunities.*
- *The security situation in the country allows humanitarian programme implementation.*
- *UNHCR continues to be able to monitor programme delivery.*
- *UNHCR and PMM can readily shift working modalities (from virtual to in-person and vice-versa) if required.*
- *There will be no further disruptive exchange rate fluctuations.*
- *There will be no major events (including epidemics, natural disasters, etc.) interrupting the work on the ground and hampering humanitarian program implementation*

File No.	2023 – 22487 / 23/25879		
Country	Türkiye		
Responsible Unit	Migration Task Force		
Sector	Migration		
Partner	United Nations High Commissioner for Refugees (UNHCR)		
DKK million	**2023**	**2024**	**Total**
Commitment	22	0	22
Projected disbursement	22	0	22
Duration	January 2024 – March 2025		
Previous grants	DKK 20 million (June 2022-June 2023)		
Finance Act code	§06.32.10.13		
Head of unit	Nicolaj A. Hejberg Petersen		
Desk officer	Therese Marie Bostrup		
Reviewed by CFO	Andreas Stabursvik		

Relevant SDGs *[Maximum 1 – highlight with grey]*

No Poverty	No Hunger	Good Health, Wellbeing	Quality Education	Gender Equality	Clean Water, Sanitation
Affordable Clean Energy	Decent Jobs, Econ. Growth	Industry, Innovation, Infrastructure	Reduced Inequalities	Sustainable Cities, Communities	Responsible Consumption & Production
Climate Action	Life below Water	Life on Land	Peace & Justice, strong Inst.	Partnerships for Goals	

Strategic objectives

The overall objective of the project is to enhance efficiency of registration procedures through technical and operational support to PDMMs in close cooperation with PMM. This will be accomplished through the provision of personnel, material, equipment, training, on-the-job coaching, and technical information.

Justification for choice of partner:

UNHCR is mandated to provide international protection and assistance to refugees, asylum seekers, refugee returnees, internally displaced persons and stateless persons. UNHCR has a particularly strong presence on the African continent and in the MENA region as well as in Afghanistan and neighboring countries – also reflecting where the majority of the world's refugees are hosted. While humanitarian actors such as UNHCR can neither prevent nor solve conflict, their assistance to affected persons remains crucial. With UNHCR's exclusive mandate, there is no other humanitarian organization, which can shoulder the responsibility for international protection, assistance and durable solutions for refugees. There is a high degree of convergence between UNHCR's Global Strategic Priorities and priorities of Danish Humanitarian Assistance. UNHCR's role as catalyst for more comprehensive approaches to protracted refugee situations in line with the Global Compact on Refugees is an expression of the implementation of the humanitarian-development nexus.

Summary:

"Support to the National Asylum System through Strengthened Registration as the Gateway to Protection – II " will be implemented as a follow-up to phase one that UNHCR has implemented from June 2022 to June 2023. Based on the milestones and achievements of phase one, the second phase of the project will continue to support PMM and its PDMMs in the following areas: advancing registration processes; enhancing efficiency of registration; enhancing registration data quality; managing and decreasing registration backlogs; and providing technical support. UNHCR will continue to assist PDMMs in identification of persons with specific needs at the registration stage and their referral to protection mechanisms through the Protection Desks.

Budget:

Capacity development support to enhance PMM's registration efforts	11,710,772
Assistance for the identification and referral of persons with specific needs	8,937,594
Communication	8,911
Indirect support cost	1,342,723
Total	**DKK 22 million**

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Project Proposal to the Government of Denmark
UNHCR Türkiye

September 2023

Project title:	Support to the National Asylum System through Strengthened Registration as the Gateway to Protection
Donor Reference	2023 - 22487
Executing Agency	UNHCR
Beneficiaries:	International protection applicants and Syrians seeking temporary protection
Project Site(s)/Location(s):	Across Türkiye
Duration:	1 January 2024 – 31 March 2025 (15 months)
Proposed Budget:	DKK 22 million (equivalent USD amount 3.147 million)

1. Introduction

The present project proposal outlines the context, strategic considerations, rationale, justification, objectives, activities, and proposed budget for the project entitled "Support to the National Asylum System through Strengthened Registration as the Gateway for Protection" from January 2024 through March 2025 (implementation period of 15 months).

2. Parties

Denmark's Ministry of Foreign Affairs and United Nations High Commissioner for Refugees (UNHCR).

3. Contributions

Denmark, represented by the Inter-ministerial Migration Task Force, commits to a contribution of DKK 22 million (twenty-two million Danish Kroner) for the period of 01 January 2025 to 31 March 2025.

The contribution will be transferred to UNHCR in one instalment as follows:

▪ The total contribution of DKK 22 million will be effectuated at the earliest opportunity upon the receipt of the written acceptance of Denmark's contribution.

This proposal contributes to the overall cooperation of UNHCR Türkiye with the Turkish Presidency of Migration Management (PMM), supported also by UNHCR's other donors including but not limited to the European Union Civil Protection and Humanitarian Aid Operations (ECHO), the Bureau of Population, Refugees, and Migration (PRM) of the United States of America, Germany, France, Japan, and Norway. Specific activities and preliminary targets serving the overall objective are listed below. Final targets and indicators will be set through UNHCR Türkiye's detailed planning process later in 2023, in cooperation with PMM; as such, the targets and indicators here may be altered during the implementation period.

4. Context, Strategic Considerations, Rationale, and Justification

Context

Türkiye hosts nearly four million refugees. Currently, there are 3.3 million Syrians under Temporary Protection (TP) in Türkiye and 290,000 international protection (IP) applicants and status holders, including those from Afghanistan, Iran, Iraq, Ukraine and a wide range of other countries. Türkiye has been the largest refugee hosting country in the world since 2014.

Türkiye has a comprehensive and inclusive legal framework providing international protection to those who are in need, based on the Law on Foreigners and International Protection (LFIP) and the Temporary Protection Regulation. Syrian nationals, stateless persons, and refugees who have arrived in Türkiye since April 2011 are granted temporary protection status. Other nationals go through individual refugee status determination procedures. Türkiye is party to the 1951 Refugee Convention and its 1967 Protocol and maintains the geographical limitation. The LFIP, dated 2013, established the Directorate General of Migration Management (DGMM) as the sole competent authority in charge of procedures for all foreigners in Türkiye. In October 2021, the institution was transformed into the "Presidency of Migration Management" (PMM) by a Presidential Decree. PMM is the asylum institution of Türkiye, entrusted with competencies for policy making and implementation. Through its provincial directorates (PDMMs) in Türkiye's 81 provinces, PMM conducts *inter alia* registration; documentation; identification and referral of persons with specific needs; and refugee status determination procedures.

Türkiye is in a pathway of mixed movements. Among people intercepted, rescued, or apprehended upon irregular entry or presence, there are those who need to seek international protection in Türkiye, victims of human trafficking, unaccompanied children, and persons with special needs. The ongoing conflicts in Afghanistan, Syria, Ukraine, and elsewhere have the potential to trigger new population movements.

UNHCR has a longstanding presence in Türkiye, having embarked on a cooperation with national authorities on asylum and refugee related matters over sixty years ago, in 1960. In 2016, Türkiye and UNHCR signed a Host Country Agreement to formalize and strengthen the existing partnership in view of the growing needs resulting from the Syria crisis. In 2023, UNHCR continues to operate out of its country office in Ankara and field offices in Ankara, Edirne, Gaziantep, Hatay, Istanbul, Izmir, Sanliurfa, and Van, with close to 400 staff members, 85 per cent of whom are national staff.

Strategic considerations

The context of Türkiye also offers opportunities to realize the sustainable development goals and pledges made during the 2019 Global Refugee Forum (GRF). Türkiye took a very active role in drafting the Global Compact on Refugees (GCR) and was one of five co-conveners of the GRF in December 2019. Following the GRF, Türkiye has been advocating in various international fora for a full implementation of the GCR, underlining the importance of easing the burden on host countries through international responsibility-sharing.

As highlighted in the Organisation Strategy for Denmark's engagement with UNHCR for 2022-2026, UNHCR continues to play a catalyst role in pursuit of implementation of the comprehensive GCR responses, including strong collaboration with the Government of Türkiye. Through the Regional Refugee and Resilience Plan (3RP) and under the umbrella of the UN Sustainable Development Cooperation Framework (UNSDCF), UNHCR is cooperating with the Government, sister UN agencies, and other actors, working towards the realization of the GCR and Türkiye' s pledges at the GRF.

UNHCR's programmes in Türkiye underline the importance of achieving a more sustainable future

for all. While both Denmark and UNHCR recognize the Agenda 2030's commitment to "leave no one behind" (LNOB). Türkiye has also integrated this commitment into its National Development Plan and the Voluntary National Review, which explicitly reference the overarching LNOB **principle.** As the lead agency under the Refugee Pillar of the 3RP, UNHCR, together with the Resilience Pillar leader UNDP, is closely coordinating with authorities and other agencies both in Ankara and in the field to ensure harmonized interventions and to bridge the humanitarian response with development activities, thus promoting the humanitarian-development nexus. The 3RP continues to explore synergies between humanitarian and development processes, including with ongoing current global processes.

UNHCR implements activities to support PMM in implementation of the LFIP. Because PMM is a relatively young institution with an enormous responsibility but with relatively limited operational capacity in comparison to the high demand, UNHCR's support remains critical. UNHCR combines its support to public institutions with a gap-filling and catalytic role in assisting refugees in need and promoting self-reliance and social cohesion. In accordance with the **"one-refugee" policy**, UNHCR aims to implement a well-coordinated and holistic approach serving both persons under temporary protection and those under international protection. At the same time, UNHCR seeks to strengthen and further advance the capacities of key local actors, including public institutions and NGO partners. As such, UNHCR works to complement other interventions, including those funded by other entities, without creating duplication.

Rationale

Registration with the PDMMs is paramount to IP and TP applicants and status holders having the ability to remain lawfully in Türkiye; to access rights and services; and to be protected against refoulement. As the initial stage of the asylum procedure, registration subsequently leads to status determination for IP applicants and to durable solutions eligibility (including resettlement consideration) for all. In addition, IP and TP applicants benefit from access to national public services, including health, education, and social assistance. Such services constitute a key component of refugee protection in Türkiye.

A mechanism to identify and refer refugees with specific needs is well established in Türkiye and includes PDMMs. With UNHCR's support, the PDMMs have put in place dedicated Protection Desks to quickly identify refugees with specific needs upon registration, to refer them to relevant service providers, and to address protection risks. Such cases include, among others, unaccompanied and separated children, persons with disabilities, survivors of torture, survivors of GBV, persons with medical needs, women and children at risk, older persons, and persons with specific legal needs and/or physical protection needs. Despite this process, vulnerabilities have been exacerbated by the protracted nature of the displacement, combined with economic challenges and other factors. In particular, child protection and gender-based violence (GBV) risks have increased.

On 6 February 2023, two earthquakes of 7.7 and 7.5 magnitude were recorded in Kahramanmaraş province in Türkiye's southeast, which severely impacted 11 provinces in the region. The affected area is home to 15 million people, including some 1.75 million refugees (Syrians under TP, and IP applicants and status holders of other nationalities). The magnitude of the disaster not only generated immense needs for the persons impacted but also resulted in interruptions, reductions, and delays in the provision of services from public institutions, including PDMMs. The earthquakes impacted residence in the 11 provinces and also triggered a population movement to non-affected provinces. The temporary stay of refugees in these provinces was made available through the prompt response of PDMMs. However, in the long run, registration procedures (including data update, identification of special needs, etc.) will continue to be critical, given the new environment created as a result of the earthquakes.

Justification

Due to the ongoing heavy caseloads, insufficient operational capabilities in some provinces, new responsibilities assumed by PDMMs in recent years (including address registry), and the impact of the February 2023 earthquakes, PDMMs' capacities continue to be stretched. As a result, UNHCR's technical and operational support continues to be needed for registration procedures and to enable Protection Desks to identify persons with specific needs, refer them to specialised services, and seek durable solutions as required by their individual circumstances.

Between 2023 and 2025, UNHCR's operation in Türkiye will continue to pursue five strategic directions, or impact statements, as UNHCR's result based management system articulates:

1) **People in need of international protection have access to quality, fair and efficient procedures in line with international law and the national legal framework.** UNHCR will continue promoting access to and support for the provision of protection, helping persons in need of protection to have their application registered in a fair and efficient manner and find protection in line with Türkiye's obligations under international law and its national legal framework.

2) **People in need of international protection have access to essential and social services.** UNHCR will continue strengthening protection and access to quality services for refugees with specific needs, helping persons of concern enjoy their rights in a dignified and respectful manner, through effective and improved access to services.

3) **Refugees participate in social and economic life harmoniously with the host community.** UNHCR will continue promoting social cohesion and harmonization, so that refugees and host communities can live in mutual understanding, respect, solidarity, and trust.

4) **Refugees have opportunities for suitable and sustainable solutions based on their individual needs. UNHCR will continue** working towards durable solutions, allowing refugees to attain suitable and sustainable solutions based on their individual capabilities and needs.

5) **People in need of international protection and the host communities benefit from coordinated support from a wide range of actors.** UNHCR will continue increasing multi-stakeholder support to the refugee response, striving to achieve a whole of society approach that enables greater support to, and the protection of, refugees.

The first statement, focusing on access to asylum procedures, remains a priority for UNHCR in 2023 and in the years to come. For refugees and asylum-seekers to access fair asylum procedures in Türkiye, PMM must have a strengthened capacity to register cases and to identify and refer applicants with specific needs.

5. Project Objective and Activities

Overall: Achievements and Lessons Learned

UNHCR's support to national authorities in Türkiye, in particular to PMM, has been an integral part of its priority areas in the past years. This support includes the provision of operational and technical support to PMM, in the form of deployment of staff to selected PDMMs across Türkiye and by providing training, to improve timely and effective access to registration by international and

temporary protection applicants.

UNHCR's sustained advocacy and cooperation with PMM has enabled those in need of protection to access improved protection processes and services. The areas of progress towards this impact were in the authorities' capacity to implement relevant procedures and safeguards efficiently, with quality. So far, UNHCR has also played a unique role in supporting improvement of procedures.

In 2022, UNHCR, in total, supported the authorities with:

- Providing 1,500 staff and information system support to PMM, maintaining their capacity to register, identify persons with specific needs, and conduct refugee status determination procedures. This support staffed 64 Provincial Directorates of Migration Management (PDMMs) out of 81, three International Protection Decision Centres, 50 Protection Desks, and their Help line. PMM registered new applicants and updated three million people's data in the 64 PDMMs. Protection Desks conducted 153,000 interviews with persons with specific needs and made 571,000 referrals to expert institutions.
- Training 9,000 PMM staff, lawyers, first responders, judges and prosecutors on legal, protection, statelessness and quality assurance topics.

Through this support in 2022, 120% of the total registered population were able to benefit from **registration data updates**. This figure surpasses 100% because it does not necessarily reflect the number of unique individuals, as applicants are expected to approach PDMMs every time they are required to communicate a change in their civil status, in their household composition, residence address, employment or education status, contact information, special needs, etc. Therefore, individuals can go through several data update interviews in the course of one year depending on the needs. With UNHCR assistance, PDMMs performed a total of 4,415,578 interviews for registration record updates.

Also, throughout 2022, Protection Desks continued to play a key role in the **identification, prioritization, and referral of persons with specific needs**. Protection Desk staff conducted individual interviews and detailed assessments to identify any special needs and vulnerabilities of persons of concern as well as the protection risks the person is or might be facing. They also recommended the appropriate level of intervention to respond to the identified needs and vulnerabilities. Interventions included individual counselling, referral to state service providers, or on-the-spot intervention for cases requiring urgent attention. During 2022 and in 2023 until end of March, a total of 253,700 Protection Desk interviews were conducted.

In addition to staff deployments and material and technical assistance, UNHCR continued its **capacity development activities to strengthen the knowledge, expertise, and operationalization of project personnel** in the area of asylum. UNHCR and PMM also carried out online induction trainings to equip the new recruits with necessary information on registration procedures and standards, national legislation, specific needs, and functions, and responsibilities of each position following their deployment. During 2022 and in 2023 until end of March, a total of 193 personnel benefited from the induction training, which helped to orient them to PDMM and PMM structure, the standards to observe, and their main tasks and objectives. Moreover, 1,035 Protection Desk personnel and interviewers received protection trainings. The trainings focused on specific protection themes including GBV, child protection, human trafficking, interviewing techniques, prevention of sexual exploitation and abuse, stress management, and code of conduct along with a refresher session on the terms of reference as well as the rights and responsibilities of persons under temporary protection and international protection in Türkiye.

As a result of these activities and efforts the registration backlog for IP has decreased by 76% from July 2021 to June 2023. Compared to the first half of 2021, the **registration record updates increased** by 21% in the second half of 2021, and 76% in the first half of 2022. The registration record update has been stable throughout 2022 and temporarily decreased in the first half of 2023 due to the impact of earthquakes. Compared to the first half of 2021, **the protection desk interviews increased** by 53% in the second half of 2021, and 46% in the first half of 2022.

Additionally, **the trainings resulted in an enhanced identification and referral processes** of persons with specific needs and individuals under risk, **improved the quality of the interviews and their evaluations**, as well as provision of practical guidance for challenges experience in the field. The pre/post-tests implemented during the trainings in 2022 and 2023 shows a 66% to 72% improvement in overall knowledge. It has also been observed that questions raised during the question-and-answer sessions by the personnel who attended the protection trainings have become more nuanced and focused on more complex-case specific issues rather than addressing the protection information gap. The trainings served as platforms to share experience, challenges, and good practices and provided participants an opportunity for peer-learning. The trainings also supported UNHCR to complement its monitoring activities regarding local issues and implementation by PDMMs.

Through UNHCR's support to PMM for registration and Protection Desks, of which the support of Denmark is a key component, it has become clear that PMM and PDMMs will require sufficient and sustained operational and technical capacity in order to maintain and improve registration and related services. To reduce inconsistency across locations and personnel, it will be key to ensure the compliance of all personnel with the law, through an efficient oversight mechanism. The Protection Desks can enhance their efficiency so that more vulnerable people in need of protection can be referred to the relevant authorities. To help improve PMM' s efficiency and effectiveness. UNHCR will also need to effectively coordinate with other actors, such as IOM and the EU, in supporting PMM.

Only when the existing gaps and challenges faced by PMM and PDMMs are addressed will Türkiye's protection system—of which registration is the gateway activity—be fully functional to meet protection needs, in full compliance with the national and international legal framework.

Objective
The overall objective of the project is to enhance efficiency of registration procedures through technical and operational support to PDMMs in close cooperation with PMM. This will be accomplished through the provision of personnel, material, equipment, training, on-the-job coaching, and technical information.

UNHCR will continue to support PMM and its PDMMs in the following areas: advancing registration processes; enhancing efficiency of registration; enhancing registration data quality; managing and decreasing registration backlogs; and providing technical support. UNHCR will continue to assist PDMMs in identification of persons with specific needs at the registration stage and their referral to protection mechanisms through the Protection Desks.

Outputs/Activities
Output 1 (Activity): Provision of capacity development support to enhance PMM's registration efforts: In view of the large scale of the refugee population, continuous high needs, and recent challenges, UNHCR will continue to provide operational and technical support to PMM to advance the efficiency of registration procedures.

In 2023, UNHCR has provided support personnel to PMM and the relevant PDMMs in 63 provinces. The support from Denmark has and will continue to fund this personnel support based on the contribution amount, along with UNHCR's other donors supporting this activity. For the implementation period of this project, the number of personnel to be deployed and the number of provinces to be supported may vary due to changes in targets to be set as well as the needs and personnel availability, all of which will be discussed and coordinated with PMM based on the yearly targets set for each objective. The selection criteria for the provinces to be supported are a) the overall population figures of persons under temporary protection and international protection in the provinces; b) the registration backlogs reported by the PDMMs; c) the needs identified as per the monitoring conducted by UNHCR (through UNHCR's monitoring missions to the provinces, meetings with partners, reports from different sources, individual case interventions, and calls received by the UNHCR counselling line); and d) key performance indicators that measure the achievements and progress against targets as well as the reasons behind the compliance or noncompliance.

The tasks and responsibilities of the UNHCR-supported project personnel include a wide spectrum of activities: updating data for individuals under temporary protection and international protection; address registry; facilitating the processing of applicants' reporting obligation; checking necessary documents in the applicants' native language and facilitating their application process; assisting PDMMs with the reporting and the development of statistics; and helping with interpretations as well as translations where needed. This support will increase the PDMMs' registration efficiency.

As per past practice, the personnel will engage with the beneficiaries in the languages most spoken by asylum-seekers and refugees, including Arabic, Farsi, Dari, Somali, Turkmen, English, and Turkish, in addition to interpreters in Russian and Ukrainian. UNHCR will continue to retain personnel who are already supporting the PDMMs to the extent possible, to avoid a high level of staff turnover and to increase institutional capacity-building.

UNHCR will continue to provide new recruits with induction trainings, undertaken either in-person or remotely, and to provide capacity development activities targeting the personnel deployed at PMM and PDMMs. The induction trainings are mandatory and focus on registration procedures and standards, national legislation, specific needs and functions of protection desks, and the code of conduct, which improve the integration of new personnel to the PDMM and PMM structure and their comprehension of the standards for their main tasks. Other deployed staff may also join the induction trainings to gain new knowledge or to refresh content. UNHCR and PMM are also jointly conducting Question & Answer sessions to address inquiries raised by the participants on the national legal framework, registration and data update procedures, identification and referral of persons with specific needs, and interviewing techniques. In addition, thematic protection trainings for protection desk interviewers will continue. Themes include GBV, child protection, human trafficking, interviewing techniques, prevention of sexual exploitation and abuse, stress management, data protection, integrity and code of conduct along with the refresher session on the terms of reference of Protection Desk personnel and interviewers as well as the rights and responsibilities of applicants in Türkiye.

UNHCR will also provide material assistance to the PDMMs where needed, including support for infrastructure and equipment, specifically to be used by the personnel serving refugees and asylum-seekers.

Output 2 (Activity): Assistance for the identification and referral of persons with specific needs: To support the identification, prioritization, and referral of persons with specific needs at the PDMMs,

UNHCR will continue to provide Protection Desk personnel to PDMMs in 48 provinces and may establish additional Protection Desk per the needs assessed. The support from Denmark has and will continue to fund this personnel support based on the contribution amount, along with UNHCR's other donors supporting this activity.

Protection Desk personnel provided by UNHCR includes interviewers and social workers. The majority of interviewers are Arabic speakers, with the remaining covering other languages spoken by refugees and asylum-seekers in Turkey, including Farsi, Dari, Turkmen, and Somali. The Protection Desks are supported by social workers with special expertise, in order to enhance case management and to guide the rest of the Protection Desk personnel.

As PDMMs constitute the first official port of contact for all asylum-seekers upon their arrival in Türkiye, including for asylum-seekers with specific needs, and as registration represents the gateway to refugees' access to services, the Protection Desks remain vital to shaping the path forward for persons with specific needs. The desks conduct interviews to make detailed protection assessments to identify persons' vulnerabilities, prioritizing and fast-tracking applications, and referring individuals to the relevant public entities or other protection services for targeted follow-up assistance. Based on past trends, most Protection Desk referrals are expected to be provided for support from YİMER (PMM's hotline), Provincial Directorates of Family and Social services, municipalities, Social Assistance and Solidarity Foundation, Turkish Red Crescent, Bar Associations, and other entities.

In light of the overall support explained above, the following are the preliminary targets to be covered under the support to PMM, to which Denmark is contributing. These are based on the 2023 annual targets, to be adjusted once the 2024 operational planning is complete:

- **Registration processing**
  - TP data updates: 1,500,000
  - TP address registries: 750,000
  - IP data updates: 500,000
  - IP address registries: 150,000

- **Identification of persons with specific needs**
  - A total of 67 social workers to be deployed at Protection Desks at PMM and various PDMMs for identification and referral of vulnerable cases.
  - A total of 165,000 Protection Desk interviews completed.

6. Results and Indicators

Result: Registration efforts of PMM supported

Output 1 (Activity): Provision of capacity development support to enhance PMM's registration efforts

Output Indicator 1.1 - Number of data update interviews with foreigners within the scope of Temporary and International Protection
- Target value: 2,000,000

- Source and method of data collection: PMM reports
- Comments: The target value of 2,000,000 reflects the total number of data update interviews, not necessarily unique individuals.

Output Indicator 1.2 - Number of PMM personnel whose knowledge and capacity on registration was improved
- Target value: 600
- Source and method of data collection: UNHCR reports
- Comment: The indicator measures the number of PMM and PDMM staff, including the project staff deployed, benefitting from UNHCR induction and thematic protection trainings. The number may include duplications, as the same personnel might benefit from several different trainings during the reporting period.

Output 2 (Activity): Assistance for the identification and referral of persons with specific needs

Output Indicator 2.1 - Number persons of concern with specific needs identified and counselled by Protection Desks during the year
- Target value: 165,000
- Source and method of data collection: PMM reports
- Comment: The indicator measures the total number of protection desk interviews, not necessarily unique individuals as there might be follow-up interviews or newly emerged specific needs.

7. Theory of Change

UNHCR's theory of change regarding registration and related activities is as follows:

People in need of international protection have access to quality, fair and efficient procedures in line with international law and the national legal framework.
- If there is a centralised control and oversight mechanism, then consistent and quality practices will be realised, encouraging the officials to comply fully with the established procedures and thereby avoiding arbitrariness.
- If sufficient technical and operational support is provided to the PMM/PDMMs, then those who approach them can register and get processed speedily.
- If the Protection Desks at the PDMMs continue to function fully, the quality of registration will improve and the number of persons with specific needs identified, referred, and supported will increase.
- If provided with international expertise on data management, PMM will manage data quality and be encouraged to share data.
- If a central quality assurance mechanism is established, then the quality of asylum procedures will improve.

8. Results framework

After decades of annual planning, selected UNHCR operations, including the UNHCR Türkiye operation, have started to implement multi-year strategies. The purpose of a Multi-Year Strategy is to establish a vision of change in the lives of forcibly displaced persons, as well as the results and resources needed to achieve this vision. The Multi-Year Strategy facilitates strategic planning for

longer term changes and engagement with national and UN partners and processes and is jointly developed with stakeholders.

UNHCR Türkiye, as of 2023, is engaging in this multi-year strategy and has set its five strategic directions (Impact statements) listed above. This proposal will base its results-based management system under the Impact Statement 1.

For results-based management, learning, and reporting purposes, Denmark will base the actual support on progress attained in the implementation of the project as described in the documentation. Progress will be measured through the monitoring framework and M&E framework of UNHCR, focusing of key outcomes (UNHCR Outcome and Outputs) and corresponding outputs (activities and output indicators).

Result framework for "Support to the National Asylum System through Strengthened Registration as the Gateway to Protection" project in Türkiye:

Project/Programme	Support to the National Asylum System through Strengthened Registration as the Gateway to Protection
Project/Programme Objective	To enhance efficiency of registration procedures through provision of technical and operational support to PDMMs in close cooperation with PMM.
Impact Statement	Persons in need of international protection have access to quality asylum procedures in line with international law and the national legal framework.
Core Impact Indicator	Percentage of data update interviews conducted (Percentage of persons of concern whose registration data has been updated in PMM's GöçNet, disaggregated for persons of concern under temporary and international protection)
Target value	80%
Comments	The target value should be considered in comparison to the total registered population.
Outcome and Output Statements	**UNHCR Outcome Statement**: Persons seeking international protection are registered and documented in an efficient, timely and quality manner. **UNHCR Output Statements:** - Registration of people seeking international protection is timely and effective with due consideration to their specific needs. - PMM, PDMMs, and civil registries strengthen their capacity, enabling quality and timely registration and documentation.
Output 1 (Activity)	Provision of capacity development support to enhance PMM's registration efforts
Output Indicator 1.1	# of data update interviews with foreigners within the scope of Temporary and International Protection
Target value	2,000,000
Comments	The target figure of 2,112,206 reflects the number of data update interviews, not necessarily unique individuals.
Output Indicator 1.2	# of PMM personnel whose knowledge and capacity on registration was improved
Target value	600
Comments	The output indicator measures the number of PMM and PDMM staff, including the project staff deployed, benefitting from UNHCR induction and thematic protection trainings.
Output 2 (Activity)	Assistance for the identification and referral of persons with specific needs
Output Indicator 2.1	# of persons of concern with specific needs identified and counselled by protection desks during the year
Target value	165,000
Comments	The output indicator measures the number of protection desk interviews, not necessarily unique individuals as there might be

	follow-up interviews or newly emerged specific needs.

9. Risk Management

Assumptions and risks:

- The political and operational environment continues to be favourable to UNHCR's and partners' work.

- All partners, including national authorities and NGOs, continue to work closely with UNHCR for the implementation of the proposed activities.

- There are no major and/or abrupt influx or outflux of refugees and asylum-seekers, and no major reduction of resettlement quotas and complementary pathways opportunities.

- The security situation in the country allows humanitarian programme implementation.

- UNHCR continues to be able to monitor programme delivery.

- UNHCR and PMM can readily shift working modalities (from virtual to in-person and vice-versa) if required.

- There will be no further disruptive exchange rate fluctuations.

- There will be no major events (including epidemics, natural disasters, etc.) interrupting the work on the ground and hampering humanitarian program implementation.

Contingency measures taken to mitigate risks:

- UNHCR has equipped itself with a strong risk management process ensuring a systemic risk management approach. Country operations have a risk register that is continuously reviewed and updated, and which informs decisions at all levels of the organization. All risks registers are reviewed systematically at the level of regional bureaus together with HQ Enterprise Risk Management (ERM) Service.

- UNHCR continues to build on its strong partnership with public institutions, including PMM/PDMMs, MoFSS/PDoFSS, and other entities.

- UNHCR formally and informally engages with national authorities to ensure that the legal framework for the protection of asylum-seekers and refugees is maintained and upheld.

- UNHCR continues its advocacy to support civil society organizations' effective implementation of humanitarian aid towards refugees and asylum-seekers in Türkiye.

- UNHCR continues to advocate for responsibility sharing among countries, including for resettlement and complementary pathways opportunities.

- UNHCR implements its business continuity plan in case of any security or environmental risks.

- UNHCR continues to closely monitor the security situation and provide appropriate and timely safety instructions to asylum seekers and refugees, staff members, and partners.

- UNHCR continues to carry out participatory surveys and field-level monitoring (through its local offices and partners) to enhance its understanding of the protection situation and trends among refugee communities.

- UNHCR continues to fundraise for its Operational Plan (OP).

- UNHCR has a robust set of policies to prevent and address all kind of misconduct, including fraud and corruption, and related guidance has been developed and refined over the years to support effective implementation of these policies, overseen by a well-established and effective safeguarding team. UNHCR has its own Global Strategic Framework for the Prevention of Fraud and Corruption outlining UNHCR's policies and methods to strengthen the prevention of, and its response to, incidents of fraud and corruption. UNHCR recognises that it is a potential victim of fraudulent acts whether by its staff or external parties with which it has business relations and outlines its exposure to risks in three broad categories: i) financial, ii) operational and iii) reputational risks. UNHCR partners sign their commitment for adhering to UNHCR's policies as part of their partnership agreement.

10. Inputs/Budget

Description	Estimated budget	
	USD	**DKK***
Output 1 (Activity): Provision of capacity development support to enhance PMM's registration efforts	1,686,216	11,710,772
Operational staff (runner, project support, receptionist, ICT, process manager)	155,176	1,077,698
Interviewers	654,267	4,543,882
Interpreters	876,774	6,089,192
Output 2 (Activity): Assistance for the identification and referral of persons with specific needs	1,286,911	8,937,594
Protection Desk Personnel (Protection Interviewer, Prot. Desk Social Worker)	1,286,911	8,937,594
Communication and Visibility efforts	1,283	8,911
Subtotal	2,974,410	20,657,277
Indirect support cost	193,337	1,342,723
Total	**3,167,747**	**22,000,000**

* September 2023 UN exchange rate: 6.945

11. Financial and contractual management, monitoring, and reporting

The grant will be managed in accordance with the **Humanitarian Partnership Framework Agreement** between UNHCR and Denmark. It is the responsibility of UNHCR to ensure that the financial management follows the principles set forth in the Framework Agreement and the practice outlined in the Financial Rules of Voluntary Funds Administered by the High Commissioner for Refugees referenced therein. Specific points pertaining to this contribution are mentioned in this proposal.

Between 2023 and 2023, as part of its commitment to **Accountability of Affected Populations (AAP)**, UNHCR will continue to systematically identify and integrate diverse community views on needs, concerns, and capacities into its programme design, implementation, and monitoring. UNHCR carries out all activities in line with its 2018 Policy on **Age, Gender, and Diversity (AGD)**, which is binding for all operations, seeking to include TP and IP status holders and applicants of different age, sexual orientation, and gender identity, as well as different nationalities, backgrounds, abilities, disabilities, health, social and economic status, skills, and other characteristics. UNHCR includes a balance of women, girls, men, and boys of different age groups, different nationalities, and varying protection needs in focus group discussions (FGDs), surveys, and other assessments that feed into the design of UNHCR's programmes, as well as in the implementation and evaluation of its activities.

UNHCR will implement regular and annual participatory assessments with age, gender, diversity groups and will utilize common participatory methodology tools such as data collection forms and interactive analysis platforms, developed by the operation to align participatory approaches across its programming and to allow for analysis with an age, gender and diversity lens. It will also continue to regularly identify and adapt consultation and feedback collection methods to allow channelling of diverse community feedback to UNHCR's protection strategies and plans. It will regularly consolidate, analyse, and report on the information collected through participatory approaches at

operational levels to guide both internal and external refugee protection, assistance and solutions, planning and programming frameworks.

UNHCR will continue close collaboration with community structures including with outreach volunteers and committees of women, youth, elderly persons, persons with disabilities, and LGBTQI+ individuals, as well as community leader networks and refugee-led organisations to increase meaningful community participation and engagement. This action will strengthen and amplify community-led initiatives, women's participation in decision-making and management structures, the outreach to and identification of persons with specific needs, and the representation of refugees in local structures.

UNHCR also offers a variety of confidential and accessible **feedback and complaints mechanisms to its beneficiaries**. For example, beneficiaries can make use of a dedicated line as part of the UNHCR Counselling Line to provide complaints to UNHCR. Also, to facilitate beneficiaries' feedback regarding their satisfaction on the support received through the counselling line, Customer Satisfaction Metrics have been in place since late November 2021. Moreover, a complaint box is made available at UNHCR's case management office in Ankara, where protection and resettlement interviews are organized. Additionally, persons of concern can contact UNHCR by sending an email to UNHCR Türkiye's general email account turan@unhcr.org, which is monitored regularly by the organization.

UNHCR focuses its priorities and includes several measures in its programming, on **building resilience and sustainability**, as well as encouraging **national ownership of the refugee response**, through various elements. UNHCR activities under this proposal aim at building capacity of local institutions and contribute to the **long-term strategies** to reduce humanitarian needs, underlying vulnerability and risks. These activities are aimed at building and further developing the registration capacity of PMM/PDMMs at the national and provincial level, as well as the entities' capacity to identify and provide follow-up support to persons with specific needs. Additionally, UNHCR's trainings for PMM/PDMM staff help build local capacity in the long-term, fostering national ownership of the response. Registration is the first required step for refugees to be protected against refoulement and to access services and assistance; therefore, it represents the basis for all other refugee response interventions by UNHCR and partners in Türkiye (both humanitarian and development activities).

Monitoring of the activities will be based on the reports and observations made by UNHCR through its Field Offices, missions, partners, and beneficiaries, as well as the performance monitoring based on the monthly indicators shared by PMM.

Finally, **regular monitoring missions** to a selected number of PDMMs will be organized and joined by UNHCR to a selected number of PDMMs during 2023 and 2024. These missions will observe and assess registration practices, identify persisting gaps, evaluate needs for further support, and identify challenges. Some missions will be carried out both jointly with PMM and some separately by UNHCR.

Under this grant, UNHCR will submit **a final narrative and financial report** no later than 6 (six) months following the end of the implementation period.

12. Communication

UNHCR will ensure that the support from Denmark will be highlighted, to the extent possible, in an equitable manner, among donors to the response. This will include external publications, funding updates, and UNHCR Türkiye's official website and official social media channels.

Partner assessment

<u>1. Brief presentation of partner</u>
The United Nations High Commissioner for Refugees (UNHCR) operates under the mandate of the United Nations to lead and coordinate international action for the protection of refugees. Its primary mission is to ensure that everyone has the right to seek asylum and find safe refuge, assisting them in rebuilding their lives. UNHCR advocates for policies and actions that protect the rights and improve the lives of forcibly displaced individuals and works to find durable solutions, including voluntary repatriation, local integration, or resettlement in third countries.

Operating in over 130 countries, UNHCR has a vast network of field offices, partner organizations, and volunteers working to address the needs of refugees and displaced populations. UNHCR collaborates with governments, international organizations, NGOs, and local communities to ensure a coordinated response and effective support for refugees.

<u>2. Summary of partner capacity assessment</u>
UNHCR is a specialized agency with a wealth of experience, resources, and an extensive network dedicated to protecting and supporting refugees and displaced persons. UNHCR has decades of experience in dealing with refugee situations, developing an in-depth understanding of the complexities involved. They have extensive wealth of experts, including field workers, policy makers, legal advisors, and more, who contribute their knowledge to project management.

UNHCR has a longstanding presence in Türkiye, having embarked on a cooperation with national authorities on asylum and refugee related matters over sixty years ago, in 1960. In 2016, Türkiye and UNHCR signed a Host Country Agreement to formalize and strengthen the existing partnership in view of the growing needs resulting from the Syria crisis. In 2023, UNHCR continues to operate out of its country office in Ankara and field offices in Ankara, Edirne, Gaziantep, Hatay, Istanbul, Izmir, Sanliurfa, and Van, with close to 400 staff members, 85 per cent of whom are national staff.

In the appraisal of this project (attached), the appraisal team (AT) assessed the partner choice, partner commitment and capacity through the lens of Denmark's broader and more strategic engagement with UNHCR. The AT found that UNHCR, by having the mandate to support National Asylum Systems, is therefore a core partner for Denmark in its engagement with global refugee situations, including in Türkiye. It is in line with its protection mandate to be the preferred partner for Denmark in this respect.

Building on the latest MOPAN assessment of UNHCR (published 2019) the AT highlights that "UNHCR's trajectory of organisational change was seen as positive with recognition of a comprehensive change management process having taken off in 2017 and including more decentralisation of key functions and processes. It was also found that the core functions of the mandate, human rights and protection concerns lie at the heart of the organisation's interventions and is associated with strong design tools, training and programme approval mechanisms and resourcing. Human rights and protection concerns are effectively integrated in how the organisation "thinks" and works. The MOPAN assessment also noted that operationally the organisation continues to have a short-term programming mind-set, with weak strategic level planning, transition to sustainability strategies and difficulties in providing durable solutions[1]".

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[1] MOPAN. (2019). Assessments Office of the United Nations High Commissioner for Refugees (UNHCR) 2017-18 Performance Assessment February 2019, Executive Summary

The AT finds that the choice of partner, the partner capacity and commitment is appropriate, and the right choice given the mandate, expertise, experience, partner relations and field presence of UNHCR in Türkiye.

3. Summary of key partner features

Name of Partner	Core business	Importance	Influence	Contribution	Capacity	Exit strategy
	What is the main business, interest and goal of the partner?	*How important is the project/programme for the partner's activity-level (Low, medium high)?*	*How much influence does the partner have over the project/programme (low, medium, high)?*	*What will be the partner's main contribution?*	*What are the main issues emerging from the assessment of the partner's capacity?*	*What is the strategy for exiting the partnership?*
UNHCR	UN agency with the primary purpose of protecting and assisting refugees and displaced persons around the world. Its core business revolves around providing humanitarian aid and finding durable solutions.	Low. UNHCR Türkiye had a total level of contributions of 183.64 mio. USD. This projects is equivalent to approximately 3.15 mio. USD.	Low. The outputs to be delivered by UNHCR have been specified in the project document.	Enhanced efficiency of registration procedures through provision of technical and operational support to PDMMs in close cooperation with PMM. Overall objective that persons seeking international protection are registered and documented in an efficient, timely and quality manner.	The AT finds that the choice of partner, the partner capacity and commitment is appropriate, and the right choice given the mandate, expertise, experience, partner relations and field presence of UNHCR in Türkiye. However, the organisation has a short-term programming horizon. A longer project could have saved administrative resources both in MFA and UNHCR and allowed for more strategic level outcomes.	The project document does not include a section on closure, exit strategies or sustainability. Nevertheless, the AT finds that the proposed project is sustainable in the sense that UNCHR's support is focused on strengthening Türkiye's asylum system, targeting key institutions mandated with asylum policy making and implementation.

Annex: Risk Matrix

Risk Factor	Likelihood	Impact	Risk response	Residual risk	Background to assessment
Changes of the political and operational environment making the project less relevant or favourable	Low	Major	UNHCR formally and informally engages with national authorities to ensure that the legal framework for the protection of asylum-seekers and refugees is maintained and upheld.	As it is a short-term project, it is unlikely that the situation will change to an extent where it will affect the project	Due to the ongoing heavy caseloads, insufficient operational capabilities in some provinces, and the impact of the February 2023 earthquakes, PDMMs' capacities continue to be stretched. UNHCR's technical and operational support continues to be needed for registration procedures and to enable Protection Desks to identify persons with specific needs, refer them to specialised services, and seek durable solutions as required by their individual circumstances.
Financial mismanagement or corruption	Low	Major	Suspension of funding during investigation	Impact for the projects with partner/country	UNHCR is a central and trusted partner. Former cooperation with UNHCR Türkiye has been carried out successfully
Political and reputational risk for engagement	Low	Significant	Continued monitoring of appropriateness in implementation	Inappropriate behavior from authorities	Cooperation with Türkiye on efforts for refugees are central for the EU-Türkiye cooperation
Sudden abrupt influx or outflux of refugees and asylum-seekers	Medium	Low	UNHCR continues to carry out participatory surveys and field-level monitoring (through its local offices and partners) to enhance its understanding of the protection situation and trends among refugee communities.	Insufficient resources to meet demands for registration	Trends in flows of refugees are naturally subject to unpredictability and characterized by uforeseen events and sudden changes. UNHCR monitors situation closely and adapts to arising challenges.
The security situation challenges continued programme implementation	Low	Major	UNHCR continues to closely monitor the security situation and provide appropriate and timely safety instructions to asylum seekers and refugees, staff members, and partners.	Subject to situation	Türkiye is not in threat of dramatically changes in security concerns, such as armed conflicts etc.
Sub-partners and local authorities decreases willingness to collaborate with UNHCR for the implementation	Low	Significant	UNHCR continues to build on its strong partnership with public institutions, including PMM/PDMMs	Lower impact of registration	UNHCR has a central position and a strong mandate for upholding partnerships with national authorities and civil society partners. UNHCR continues its advocacy to support civil society organizations' effective implementation of humanitarian aid towards refugees and asylum-seekers in Türkiye.
Persons of concern lack access to information on registration procedures	Likely	Significant	UNHCR continues to implement its communication with communities and partners	Lower impact of the project than possible	UNHCR carries out communication efforts through social media and other outreach
The technical capacity to comprehensively identify the challenges is not sufficient	Likely	Significant	UNHCR increases technical and operational support to PMM	Lower impact of the project than possible	The overall objective is to enhance efficiency of registration procedures through technical and operational support, accomplished through the provision of personnel, material, equipment, training, on-the-job coaching, and technical information.

ANNEX 8: PROCESS ACTION PLAN (PAP)

Action/product	Deadlines	Responsible/involved Person and unit	Comment/status
Submitting the project proposal with relevant annexes	August 2023	Partner	
Reviewing the project documents	August 2023	MTF and CFO	
Desk appraisal	August 2023	External consultants	
Feedback to partner	August 2023	MTF	
Revised project documents based on appraisal recommendations	September 2023	Partner	
Ministerial approval of the grant	December 2023	MTF/ELK	
Signing of the Grant Agreement	December 2023	Partner and MTF	
Disbursing the first (and total) instalment	December 2023	MTF	

ANNEX 9: QUALITY ASSURANCE CHECKLIST
File number: 2023-22487 / 23/25879

Programme/Project name: Support to the National Asylum System through Strengthened

Registration as the Gateway to Protection – II

Programme/Project period: January 2024 - March 2025

Budget: 22 million DKK

This Quality Assurance Checklist should be used by the responsible MFA unit to document the quality assurance process of appropriations, where development specialists from either ELK or other units are not involved in the process; i.e.

(i) *internal appraisals* of appropriations up to DKK 10 Million where this checklist constitutes the appraisal.

(ii) *external appraisals* of appropriations between DKK 10 – 43 million and (iii) appraisal in exceptional cases. The checklist aims to help the responsible MFA unit ensure that key questions regarding the quality of the programme/project are asked and that the answers to these questions are properly documented and communicated to the approving authority.

Presentation of quality assurance process:

☑ The design of the programme/project has been appraised/appraisal checklist filled out, by someone independent who has not been involved in the development of the programme/project.
Comments: Yes, the appraisal was carried out by Anne-Lise Klausen and Ayla Olesen Yurtaslan, external consultants to the Ministry of Foreign Affairs.

☑ The recommendations of the appraisal/comments in the appraisal checklist have been reflected upon in the final design of the programme/project.
Comments: Yes, MTF has taken all recommendation into consideration and the implementing partner revised the project document and budget after recommendations of appraisal. See summary of recomendations attached

☑ The programme/project complies with Danida policies and Aid Management Guidelines, including the fundamental principles of Doing Development Differently.
Comments: Yes, elaborated in line with the recommendation by the appraisal team

☑ The programme/project addresses relevant challenges and provides adequate responses.
Comments: Yes

☑ Issues related to HRBA, LNOB, Gender, Youth, Climate Change, Green Growth and Environment have been addressed sufficiently in relation to content of the project/programme.
Comments: Yes. Recommendation from the appraisal team on integration of age, gender, diversity has been integrated in the project document.

☑ Comments from the Danida Programme Committee (if applicable) have been addressed
Comments: Not applicable

☑ The programme/project outcome(s) are found to be sustainable and in line with the partner's development policies and strategies. Implementation modalities are well described and justified.
Comments: Yes. Recommendation from the appraisal team on including reflections on the sustainability of the project has been integrated in the project proposal.

☑ The theory of change (if applicable), results framework, indicators and monitoring framework of the programme/project provide an adequate basis for monitoring results and outcome.
Comments: Yes

☑ The programme/project is found sound budget-wise,
Yes

☑ The agreed budget and financial reporting procedures provide an adequate basis for financial monitoring of funds.
Comments: Yes. UNHCR internal polices do not permit UNHR to share budget details beyond the outcome/output level, despite recommendation 4.

☑ The programme/project is found realistic in its time-schedule.
Comments: Yes

☑ Other donors involved in the same programme/project have been consulted, and possible harmonised common procedures for funding and monitoring have been explored.
Comments: -

☑ Key programme/project stakeholders have been identified, the choice of partner has been justified and criteria for selection have been documented.
Comments: Yes, partner assessment included

☑ The implementing partner(s) is/are found to have the capacity to properly manage, implement and report on the funds for the programme/project and lines of management responsibility are clear.
Comments: Yes, the project is implemented by the United Nations High Commissioner for Refugees (UNHCR), dedicated to protecting and supporting refugees and displaced persons. UNHCR has decades of experience in dealing with refugee situations, developing an in-depth understanding of the complexities involved. Denmark has a Strategic Partnership Agreement/Humanitarian Partnership Framework Agreement), and has for many years been a key partner in Danish humanitarian assistance.

UNHCR has a longstanding presence in Türkiye, having embarked on a cooperation with national authorities on asylum and refugee related matters over sixty years ago, in 1960. In 2016, Türkiye and

UNHCR signed a Host Country Agreement to formalize and strengthen the existing partnership in view of the growing needs resulting from the Syria crisis. In 2023, UNHCR continues to operate out of its country office in Ankara and field offices in Ankara, Edirne, Gaziantep, Hatay, Istanbul, Izmir, Sanliurfa, and Van, with close to 400 staff members, 85 per cent of whom are national staff.

☑ Implementing partner(s) has/have been informed about Denmark's zero-tolerance policies towards (i) Anti-corruption; (ii) Child labour; (iii) Sexual exploitation, abuse and harassment (SEAH); and, (iv) Anti-terrorism.
Comments: Yes, part of the HFPA

☑ Risks involved have been considered and risk management integrated in the programme/project document.
Comments: Yes. UNHCR uses the existing risk mitigation strategy and can't elaborate further, despite recommendation 5.

In conclusion, the programme/project can be recommended for approval: yes / no

Date and signature of Desk Officer: 1/12-23 _Theresa Bostrup_

Date and signature of Management: 1/12-23 _N. Petersen_