



BIRTH REGISTRATION IN TURKEY:

PROTECTING THE FUTURE FOR SYRIAN CHILDREN

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INTRODUCTION

There are millions of Syrians today who are living without a home. Almost 12 million women, men, and children are displaced either inside or outside of Syria. But within this population, there are tens of thousands for whom “home” is challenging even to define. These are the babies born to those displaced Syrians. In Turkey, where an RI team studied the issue in March, more than 60,000 Syrian babies have been born in exile, and these numbers will continue to increase as the civil war rages on. None of the neighboring countries hosting Syrian refugees, including Turkey, provide citizenship just because a child was born in its territory. Even if a birth is recorded, Syrian nationality law only permits Syrian fathers to transmit citizenship, with very few exceptions. Tens of thousands of Syrian fathers are dead, missing, or fighting in the civil war. In their absence, children born in exile since the war began, and even some of those born in Syria, may not be able to assert their Syrian citizenship if and when they are able to return home. If they are not recognized as citizens by any country, these children will be stateless and may not have the right to attend school, access health care, work legally, or vote. And without proof of their age, they will be more vulnerable to trafficking, early marriage, and recruitment as child soldiers. Concrete steps taken now by host governments to legally record a child’s birth and collect specific information about their father’s name, location of birth, and family members could facilitate the ability of Syrian children to claim their citizenship and repatriate to Syria when stability there is restored.

RECOMMENDATIONS

- ❑ The Turkish government should ensure the registration and certification of Syrian births and match this commitment with sufficient human, financial, and technical resources.
- ❑ Turkish government officers who deal with Syrian refugees, and particularly those who meet with Syrian parents including the foreigners' police, Population Department, and the Directorate General for Migration Management (DGMM), should be trained on the importance of the birth registration and certification processes and be able to explain them to Syrian parents either in Arabic or through an interpreter. In cases where a Syrian father is not present, as well as collecting information about the name, date, and location of birth of newborns, officers should also gather as much information as possible about the father's background, including his name, the date and location of his birth, and his parents' names.
- ❑ The Turkish government, in collaboration with the UN Refugee Agency (UNHCR), the UN Agency for Children (UNICEF), and other organizations with expertise in birth registration and certification, should develop and implement an education campaign on the importance of birth registration and birth certificates and offer clear guidelines on the process for securing both.
 - ❑ Materials should explain the rights of Syrian refugees to birth registration and a birth certificate through the Population Department, ensure that it is easily accessible and not financially burdensome, list the documents required and any alternatives that may suffice if primary documents are not available, and identify any necessary next steps.
- ❑ Turkish and international humanitarian actors who work with Syrian refugees should understand the long-term impact of not registering children, including the risk of statelessness, and seek out information about the experiences of Syrians attempting to register and secure birth certificates for their children. Challenges should be documented and shared with relevant Turkish officials, the UNHCR, and UNICEF. UN agencies should meet regularly with relevant Turkish officials to address challenges and inform Syrian refugees of changes or improvements to the registration and certification systems.
- ❑ Turkish legal aid organizations should be provided with the resources needed to assist Syrian refugees attempting to secure birth registration and certificates for their children, whether the father is Turkish or Syrian.
- ❑ Consistent with the stated commitment in the October 2014 Berlin Communique to prevent and eradicate statelessness, participating nations should support the government of Turkey financially and technically to provide the best possible birth registration and certification process for Syrian refugees with a focus on preventing statelessness.

“I think birth registration has been swept under the carpet for now, but it will blow up in a few years.”

-INGO staff person in Turkey

Front cover: Women line up to register with a local NGO for assistance. Before they can take this step, they have to first register with the Turkish government. Sanliurfa, Turkey.

Opposite page: This baby was born in Turkey a few months ago. His mom is a Syrian refugee and he has not been registered with the Turkish or Syrian government yet. Sanliurfa, Turkey.

BACKGROUND

Syria just passed a grim anniversary, entering the fifth year of a conflict that has resulted in the deaths of over 220,000 people and a historic movement of people not seen since World War II. In the aftermath of that war, hundreds of thousands of people were rendered stateless due to the denationalization of Jewish people and others deemed not reflective of the German identity; and because in the aftermath of the war, some states disintegrated while new states emerged. Within a few years, the international community negotiated ways to extend international protection to many of those who had survived persecution through promulgation of the 1951 UN Refugee Convention, and the 1954 and 1961 UN Statelessness Conventions.¹ Despite these legal instruments, however, restoring or acquiring a new citizenship took decades for many who had lost their own during or after the war.

Syrians inside and outside the nation are on the front-end of a similar dilemma. No one knows how long the conflict will last, who will be in leadership, or what the borders of Syria will look like when stability is restored. In the meantime, the births of tens of thousands of Syrians are not being legally recorded. Although all children have the right to a nationality,² to claim Syrian citizenship, these babies and children will need proof that they had a Syrian father. Some will have no record of their births at all, and others may acquire a birth certificate that does not list their father's name because he is unknown, dead, or missing.

“There is no way for us to know how many births are happening in homes in Syria – we don’t even know how many are happening in hospitals.”

-Syrian doctor who works in Aleppo

Across the region, the vast majority of Syrian newborns and children are not being registered by the UN Refugee Agency (UNHCR) or host governments. According to the UNHCR, in Lebanon, almost 80 percent of Syrian refugees were not registered with the government or the UNHCR as of February

2015. In Jordan, 30 percent of refugees were not registered with either actor. The regime of Syrian president Bashar al-Assad is reportedly targeting hospitals and healthcare workers in Syria, so more women are giving birth in homes and places of refuge where there is no official recording of the birth. Depending on how the civil war ends and what will be included in the process of reconciliation, hundreds of thousands of Syrian babies and children could be made stateless, not because they don't have a rightful claim to nationality, but because they can't prove that claim

TURKEY CONTEXT

As of December 2014, Turkey was home to more than 1.5 million registered Syrian refugees.³ The actual number of Syrians present may top 2.5 million. About 15 percent of Syrians live in more than 20 camps run by the government near the border with Syria, but most registered refugees live in the surrounding areas of Hatay, Kilis, Gaziantep, and Sanliurfa. A 2013 report from the Disaster and Emergency Management Presidency (AFAD) in Turkey found that of those in camps, less than five percent had crossed with a passport.⁴ Syrians living outside the camps fled with passports less than 30 percent of the time.⁵ Yet, up to 95 percent of Syrians do possess a family booklet, which should record all the members of a household before they left Syria, but would not necessarily include new births before flight or after arrival in Turkey. Either way, the documents brought or left behind are key issues for Syrians in Turkey.

“I lost everything but my main concern is my children’s identities. I don’t want them to grow up with a name that is not theirs, or to be named after someone else.”

-Syrian refugee in Istanbul

The ability to document oneself as a parent is critical for babies born in Syria whose births were not recorded, and for those born in Turkey to Syrian parents. A Turkish government report found that in 2013, 13 percent of Syrian women in the

camps and 14 percent of Syrian women outside of the camps were pregnant at the time of the report.⁶ During its field mission to Turkey in March 2015, RI was told that while exact numbers are hard to determine, likely more than 60,000 Syrian babies have been born in Turkey since the beginning of the civil war. Whether inside or outside camps, most births take place in a hospital or infirmary, where a birth report would be issued, but not a legal document recording a birth.

CIVIL REGISTRATION IN TURKEY

“*Civil documents are important like food. Like breathing.*”

-Syrian professional living as a refugee in Gaziantep

Although Turkish officials estimate that they have spent around \$5.5 billion to assist the Syrians in Turkey, the Turkish government does not consider them to be refugees but rather guests. Since October 2014, those Syrians who were registered have received temporary protected status (TPS), which permits them to access education, health care, and social services.⁷ The status provided to Syrians is not prescribed by law. It is based on a “Circular,” or policy document, issued by the Turkish government in October 2014. The Circular permits the withdrawal of temporary protection at any time, does not provide protected status for any set duration, and does not specify what might be available to Syrians after their status expires. Registration is not centralized yet, and re-registration must occur every time a person moves to another city. So for instance, refugees who registered in Kilis will have to re-register in Gaziantep or Istanbul if they move there for work or other reasons. If they do not cancel their prior registration and register in their new location, children will not be able to access school and no family members will be able to access health care or other social services. A new agency, discussed below, is working on a centralized database.

If Syrians go into camps, AFAD officials record their names and places of origin, and Syrians receive identification cards. It is widely agreed that up to 95 percent of Syrians in camps are registered with the Turkish government. More than 1.5

Caseworkers input documentation of refugees and register them for services on a computer tablet. Sanliurfa, Turkey.



million Syrians, however, are outside the camp system and up to half of them may not be registered. When an RI team spoke with Syrian refugees in Turkey, the refugees shared several explanations for why registration was not taking place, including the absence of information and confusion about the process, fear that registration may result in the Assad regime becoming aware of their whereabouts, and rumors that by registering, they would not be able to move onto other European countries, which many refugees hope to do. Likely a combination of all these factors is contributing to the large numbers of unregistered Syrians. While the Turkish government may not be able to address all of them directly, there are specific steps it could take to educate Syrians about the registration system and why it is so important for all Syrians, and particularly babies and children, to be registered.

“The Directorate General for Migration Management is probably not completely aware of the actual registration procedure.”

-INGO worker in Gaziantep

For those Syrians living outside of camps, registration is confusing and difficult. In April 2013, the Turkish government created a new agency within the Ministry of Interior to take responsibility for – among other issues related to foreigners – registering and updating the location, status, and vital statistics (birth, death, marriage) of all Syrians. Called the Directorate General for Migration Management (DGMM), the agency is not yet fully staffed and is not available to register Syrian refugees in many parts of the country, particularly the southeast, where most Syrians are located. RI was told that the DGMM stopped registering Syrians entirely in late 2014, when the software it was using “maxed out.” Apparently, the software had the capacity to register 1.5 million Syrians, and the government is still working on a remedy. In the meantime, up to 1 million Syrian refugees have not been entered into the centralized database, which impacts the government’s ability to assess their needs, understand the burden on host communities, and respond adequately to the necessities of both populations.

Before the advent of the DGMM, Syrians registered in different ways, depending on where they were located in the country



This woman arrived from Syria about four months ago. She carries her family book, which documents the members of her house when she lived in Syria. It would not document newborns in Turkey. Sanliurfa, Turkey.

and how that city or municipality has set up the process. Now that the DGMM is not active, Syrians told RI that the most common way to register is by going to the “foreigners” police inside the local district police office. There, an officer (who is most likely not trained about the challenges facing foreigners or asylum seekers) records the person’s name, date, and location of birth, how many members are in their household, and their income situation. Documents to substantiate the statements made are requested, but if an individual does not have documents, then oral statements are sufficient.

“We just don’t know where to register – with the mukhtar? In which city? What council?”

-Syrian refugee in Gaziantep

“ I lost everything, but my ID is the most important. ”

-Employee of Syrian aid group

After registering, the Syrian should receive an identification card that would permit them to access education, health care, and social services. Depending on the size and capacity of the foreigners' police office, this could happen on the same day or months later. The bare requirements for registration certainly make the ability to register less burdensome. However, asking some crucial questions at the time of registration could provide future protection to Syrian children who have not been otherwise recorded. Particularly, the location and date of a child's birth as well as their father's name and date and location of the father's birth could prove vital later on when children are attempting to prove that they have a rightful claim to citizenship through a Syrian father. Language is an issue on all sides, as district police offices generally don't include Arabic speakers. This oversight makes it both less likely that people will try to register or that specific and vital biographical questions will be asked of those registering.

RI was also told that in some parts of the country, it is the local mukhtar (local official) who registers a person and then refers the registration to the district government, which will issue an identification document. Mukhtars can only record one family per household, however, and outside the camps it is common for 4-5 families to live together. So the remaining families cannot be registered or receive the benefits that derive from it.

BIRTH REGISTRATION FOR SYRIANS IN TURKEY

A major issue regarding the registration of Syrian births in Turkey pertains to the future status of these children after the conflict's end. According to AFAD's 2013 report, 55.9 percent of Syrians inside the camps plan to return to Syria after the end of the conflict and 63.4 percent of Syrians outside of the camps plan to return.⁸ Because Syrian nationality can only be passed through the father (unless the father is unknown or the child is a foundling), documenting the father's name and location of birth is critical to safeguarding the ability to take up Syrian nationality. However, tens of thousands of Syrian births are occurring without the presence of the father because husbands have been killed, have gone missing, or are fighting in the civil war in Syria.

It is generally agreed that most Syrian births in Turkey are occurring in hospitals and a mother will receive a "birth report" before leaving the hospital.⁹ A birth report is not a legal document. It is an administrative document that records a baby's name, date and location of birth, gender, and the parents' names, if both are available. RI was told that a mother's statement about the father's name may be sufficient for purposes of the birth report, but this is not necessarily the case when a mother goes to the foreigners' police to register the baby for TPS.

“ I am so worried about not registering my baby. I don't know when the war will end and I worry that people won't believe that she is my baby. It matters that you know who your father is. ”

-Syrian refugee in Istanbul

The foreigners' police request proof of parentage and other supporting documents, as well as a birth report. If documents are not available, registration will occur based on the statements made by a mother and/or father. If the father is not present, and the mother has neither a marriage certificate nor the birth certificate of her husband, the father's name may not be included as part of the child's registration. However, the baby will be registered and issued with temporary protection.

There are many reasons a married woman or girl may not have a marriage certificate or her spouse's birth certificate. First, countless vital documents, including birth and marriage certificates, and diplomas and degrees, have been left behind, lost, or destroyed during aerial bombardments or other forms of attack. In other cases, Syrians may have undergone a religious marriage in Syria or Turkey that was not recorded officially.

Making the situation even more difficult, RI was told that because it is Turkish officers recording the names of Syrian babies, they write them using the Turkish alphabet and



These sisters and one of their sons arrived from Syria recently. They registered for temporary protected status but still could not access services, so they are now asking a local NGO for help. Sanliurfa, Turkey.

sometimes do not write the correct date or location of birth. These errors and the “Turkisation” of Arab names may cause confusion later on for Syrian children, and particularly if they are trying to substantiate a claim of Syrian citizenship when their own name has been recorded differently than their Syrian father’s name.

“The system is different in Istanbul, Ankara, Kilis, and Gaziantep. I am told that in Kilis I could register my baby, but I can’t in Gaziantep.”

-Syrian refugee in Gaziantep

ACQUIRING A BIRTH CERTIFICATE IN TURKEY

As important as it is to register new births and young children with the Turkish government for purposes of temporary protection, only a legally recognized birth certificate recording the Syrian father’s name can ensure that a child will be recognized as a Syrian citizen. The only way to get a Syrian birth certificate in Turkey, however, is to request one through the Syrian consulate in Istanbul. For some Syrians this is not a possibility because they fear being identified as an opponent to the regime, which could put their lives in danger. Not surprisingly, this includes fighters of the Free Syrian Army and other armed opposition groups. However, it also includes doctors and other health care workers as well as human rights defenders and political activists. As a result, a black market in fake passports and birth certificates is growing in Turkey. One Syrian refugee was told that he could get a birth certificate for his child if he paid \$1000, which he did. He knew four other professionals who had done the same thing and said they were lucky because they had the financial ability to acquire

birth certificates, even if they were not real. He said that most Syrians in Turkey would never be able to afford these “fees,” and as a result would not be able to document their children for purposes of Syrian citizenship.

“I have two babies and I can’t register them with my name because I defected from the Syrian military and have been recorded as dead since 2012.”

-Syrian refugee in Gaziantep

The UNHCR in Turkey recently issued a pamphlet called “Birth Registration in Turkey” that explains to Syrians how to request a Turkish birth certificate for their newborns. According to the pamphlet, a new mother or father must bring the birth report and any available identification documents to the local “Population Department,” which is part of the Ministry of Interior. That department will record the birth information, link the child to their parents through issuance of a foreigner’s identity number, and issue a birth certificate. If a mother presents herself with a newborn, but does not have a marriage certificate and/or birth certificate of the father, he will not be listed on the birth certificate – thereby foreclosing a critical link to Syrian nationality. Syrian parents must apply for the birth certificate within 30 days of a newborn’s birth or a fee is assessed. Given that Syrians must pursue multiple processes to register their new children, and that in some Syrian communities there is a custom to wait two months to register in case the baby does not survive, the “late” fee should be waived.

The birth certificate issued by the Population Department is considered an international birth certificate and is a legal document confirming the identity of a newborn. It does not provide for Turkish nationality if neither parent is Turkish. It could, however, be an important safeguard against statelessness as it is issued by the Turkish government. Yet, RI was told that likely only a few dozen Syrian children across the country have been issued these international birth certificates, primarily because their parents are not aware of the process, or even the possibility. The refugees with whom RI spoke were confused about how to register for TPS,

and the possibility of registering with a Turkish Population Department for a birth certificate was well beyond their knowledge. Rather, to the extent parents were aware that they needed to legally document their children’s births, their understanding was that it needed to occur through the Syrian consulate in Istanbul.

In March 2015, RI met with multiple agencies within the Turkish government that deal with registration and identification issues. It was not clear that all agency actors were aware of the process outlined by the UNHCR, and indeed, like the refugees, they may also be confused. It is critical that Turkish government agencies dealing with refugee registration and children’s welfare, the UN Agency for Children (UNICEF), and the UNHCR share information on how people can record the births of their children, and what options are available. The Turkish government should also develop a public education campaign that provides refugees with information on how to register for TPS and why it’s important, and addresses the same concerns as it relates to birth certificates. Currently, there seems to be confusion or a lack of information about how to acquire a birth certificate for Syrian children among the Turkish government, UN agencies, and international non-governmental organizations. In the absence of uniform information and understanding at that level, it is very unlikely that refugees will know how to pursue these critical documents that could mean the difference between citizenship and statelessness for tens of thousands of Syrian babies and children.

“Many of us Syrian doctors didn’t have the ability to go to the government to register the births of our children in Syria because we were wanted by the regime.”

-Syrian refugee



This street sign in Gaziantep notes all of the city's "sister cities" around the world. Aleppo is one of them. Gaziantep, Turkey.



This little boy was born in Syria. His mother has not registered him in Turkey yet because of the administrative hurdles. Sanliurfa, Turkey.

SAFEGUARDS IN TURKISH NATIONALITY LAW

According to Turkish nationality law, a child may acquire citizenship through a Turkish mother or father; in addition, a child born to one Turkish parent and one foreign parent may also acquire citizenship.¹⁰ Article 8 of the Turkish nationality law states, "A child born in Turkey, but acquiring no citizenship of any state by birth through his/her alien mother or father is a Turkish citizen from the moment of birth...A child found in Turkey is deemed born in Turkey unless otherwise proven."¹¹ RI was informed that Turkey had already activated this latter provision in at least one case where a Syrian woman who conceived after being raped asked that the baby be taken by the state. The baby was assigned a legal guardian and was able to acquire Turkish citizenship, but this appears to have been an exceptional case.

In a very positive development, in 2014 Turkey issued a new "Law on Foreigners and International Protection." The law includes a process that would formally permit people to request Turkish citizenship after being found to be stateless (a statelessness status determination). Regulations must still be issued on how the process will work and how stateless persons may access it, but passing this progressive legislation during a massive influx of refugees from Syria was both an impressive and essential exercise of positive political will. The Turkish Parliament should be commended for it.

On paper, Turkey's nationality law is generous and would seem to address many of the concerns that may accompany the birth of Syrian children in Turkey when the father's identity cannot be established. However, in reality, these provisions would not come into play until it is established that a child has not acquired Syrian nationality, or cannot prove that he has. This determination will not likely occur until after stability has been restored to Syria and families are attempting to return. Thus, children in Turkey could grow up with a theoretical claim to citizenship in Syria, be treated as foreigners, but ultimately be found to be stateless and eligible for Turkish citizenship at a much later date.

Even some of the children of Turkish fathers, who should immediately acquire Turkish nationality, may be at risk of statelessness. Many Syrian girls are entering into marriages under the age of 18 as a way to ensure that they will have a roof over their heads and their families will have one less mouth to feed. Others are victims of sexual exploitation and have been forced in to marriage. Underage marriage is illegal in Turkey and therefore not legally recorded. In other cases, a Turkish man may marry a Syrian girl or woman, who then becomes his second wife. But polygamy is illegal in Turkey and these marriages are not recorded. Unlike the situation for other new parents who are Turkish and foreign, in order to be issued a Turkish birth certificate for their newborn, Turkish and Syrian parents must include a "personal status certificate"¹² from the Syrian parent (whether male or female).¹³ This certificate is technically used to confirm that the person is not married in another country, but for Syrians, it must be secured from the Syrian consulate in Istanbul. For many parents, this is

not a possibility because they are worried that by identifying themselves to the Syrian authorities they will be put in danger, and because the cost may be prohibitive, so their babies are not recorded as Turkish citizens and may instead be registered as refugees eligible for TPS. These babies will not be eligible for Syrian citizenship because their fathers are known and not Syrian and they are at a great risk of statelessness if their Turkish heritage is not recorded.

When the mother is an underage or exploited Syrian woman or girl, or it is a second marriage, the couple may also choose not to use a hospital or register the newborn because they are afraid that they will be prosecuted if they come forward. RI was told by members of the Turkish government that prosecutions of mothers and fathers have occurred after an underage mother gives birth at a hospital. If a Syrian woman is the second wife, her baby might later be registered under the name of the Turkish wife, or not at all, creating more concerns around legal identity and the risk of statelessness. RI was told of a few cases where a Turkish man entered into a temporary religious marriage with a Syrian girl or woman, and when she gave birth, he abandoned or did not recognize the child as his own. There is the possibility of pursuing a claim against the father with the help of Turkish legal aid organizations, but it is unlikely most mothers will pursue this course, which means that some Turkish children may be at risk of statelessness despite having a Turkish father.

Because Turkey does not register underage or second marriages, it is not possible to know how often this is happening. However, Turkish and international humanitarian actors that RI spoke with in Turkey believe that both types

of marriages are occurring with increasing frequency, particularly in the southeast. Turkey should remove the requirement that Turkish and Syrian parents present a personal status certificate in order to register their newborns and acquire a Turkish birth certificate.

CONCLUSION

This report focuses on the risk of statelessness among Syrian refugees and their children born in Turkey because RI had access to Turkish government agencies, refugees, and Turkish and international humanitarian actors. The heightened risk of statelessness, however, is due primarily to Syria's inherently discriminatory nationality law, which only allows citizenship to be passed down through the father, with few exceptions. The deaths, disappearances, familial separations, and sexual violence occurring as a consequence of the ongoing civil war and the inability to register all births in Syria or neighboring states, coupled with Syria's discriminatory nationality law, is a recipe for statelessness among babies and children born to Syrians during the crisis.

All the children of Syrian mothers and fathers should have the right to Syrian citizenship and the ability to repatriate if and when stability is restored. Any process toward ending the civil war and working toward reconciliation should include measures to ensure that all those with genuine ties to Syria, through birth, marriage, parents, or long-term residence have the ability to acquire Syrian citizenship.

In order to receive assistance through the Turkish government or NGOs, Syrian refugees have to register, but some of them find the process very difficult and so rely on the help of passersby. Gaziantep, Turkey.



Sarnata Reynolds and Daryl Grisgraber traveled to the Turkish cities of Ankara, Gaziantep, Istanbul, and Sanliurfa in March 2015 to assess the risk of statelessness for Syrian refugee children.

ENDNOTES

1. Syria is not a signatory to any of these conventions, and while it has signed the Convention on the Elimination of All Forms of Discrimination against Women (1979), it made a reservation to Article 9, which requires that both women and men be able to transmit nationality equally to their spouses and children.
2. UN Convention on the Rights of the Child, Article 7. Syria is a signatory to the Convention.
3. UNHCR Syria Regional Refugee Response, accessed February 24, 2015. <http://data.unhcr.org/syrianrefugees/regional.php>
4. *Syrian Refugees in Turkey, 2013 Field Survey Results*. Republic of Turkey Prime Ministry Disaster and Emergency Management Presidency, 2013. https://www.afad.gov.tr/Dokuman/TR/61-2013123015505-syrian-refugees-in-turkey-2013_print_12.11.2013_eng.pdf
5. Ibid.
6. Ibid.
7. Other refugees in Turkey, including Iraqis, Turkmen, and Afghans, are permitted to register with the UNHCR directly and can apply for asylum status, humanitarian residence, or a foreigner's ID card. These options are not available to Syrians, and their availability to other refugee populations creates confusion.
8. *Syrian Refugees in Turkey, 2013 Field Survey Results*. Republic of Turkey Prime Ministry Disaster and Emergency Management Presidency, 2013. https://www.afad.gov.tr/Dokuman/TR/61-2013123015505-syrian-refugees-in-turkey-2013_print_12.11.2013_eng.pdf
9. RI was told by one child protection officer, however, that it is likely that a high percentage of babies are being born outside hospitals in some parts of southeast Turkey because the mothers are underage. It's impossible to know how frequently this is occurring.
10. Turkish Citizenship Law (Official Gazette, May 29, 2009), <http://eudo-citizenship.eu/NationalDB/docs/TUR%20Turkish%20citizenship%20law%202009%20%28English%29.pdf>
11. Ibid.
12. This document is sometimes referred to as a "celibacy certificate."
13. This certificate is required before Turkey will issue a marriage certificate to a couple that is both Turkish and foreign, but not for purposes of issuing a birth certificate. This discrimination based on nationality may be in violation of international human rights law and certainly makes Turkish babies more vulnerable to statelessness.

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