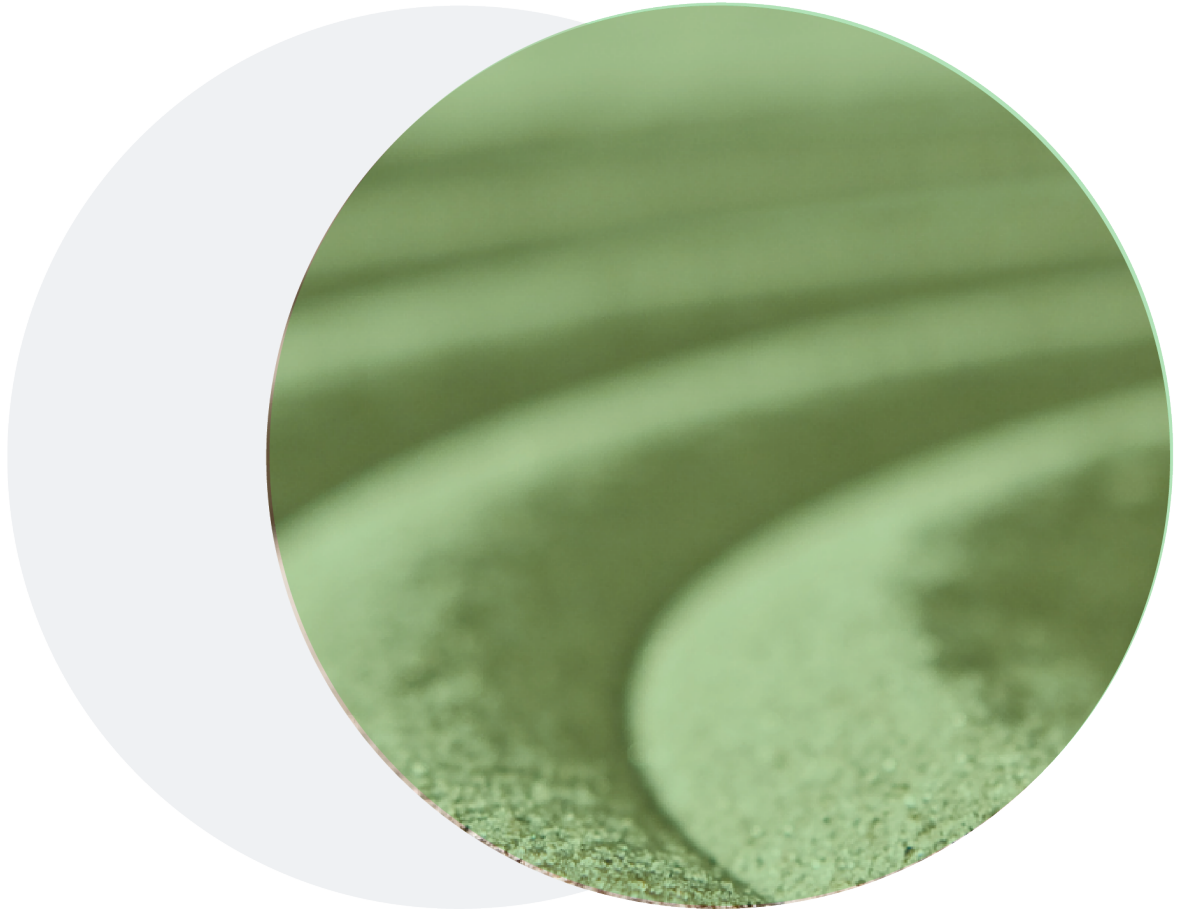




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Recent Developments in Civil Society Field III

What awaits Civil Society in the IPA III Era?

THE NEW PERIOD OF INSTRUMENT FOR PRE-ACCESSION (IPA III) AND CIVIL SOCIETY

EU financial support to Turkey remains one of the most important aspects of EU-Turkey relations, and this financial support contributes to the development of civil society in Turkey. The main EU financial instrument is the Instrument for Pre-Accession Assistance, abbreviated as IPA. This instrument is planned for a 7-year period as part of the EU budget. At the beginning of each 7-year period, you can observe that those who have been working in this field for many years express their wish not to witness the next IPA period. Behind this wish is the hope for Turkey's EU membership. Ironically, it is worth mentioning that the relations between the EU and Turkey have almost frozen in recent years, so the same people have expressed their hope for the next period.

Despite all the discussions, IPA continues to be the most dynamic dimension of Turkey-EU relations.

What is IPA?

As a financial instrument, IPA became part of our lives in 2007, linked to the EU budget cycle, which covers a 7-year period. In this context, the period between 2007-2013 was called IPA I and the period between 2014-2020 was called IPA II.

The main purpose of IPA could be defined as support to projects focused on the needs and priorities arising from the accession process of candidate countries for EU membership. Under these projects, activities are carried out to implement reforms in the candidate countries, create the necessary institutional structure for the use of structural funds during the future membership, strengthen institutional capacities and ensure economic and social cohesion.

The new period between 2021 and 2027 is defined as IPA III. It can be claimed that the support provided and the projects implemented under the EU process, especially the grants for civil society organizations, are of great importance for civil society. For this reason, the main issues of the new IPA term are summarized below.

IPA III Period

For the new period starting in 2020, the programming process has begun in Turkey and the regulations at the EU level have largely been completed.

Beneficiary Countries

In the new term, beneficiary countries of IPA consist of candidate or potential candidate countries for EU membership, as in the previous IPA II period. These countries are called “Enlargement Area Countries” or “Western Balkans and Turkey”:

- Albania (candidate country)
- Bosnia and Herzegovina (potential candidate country)
- Kosova (potential candidate country)
- Montenegro (candidate country)
- North Macedonia (candidate country)
- Serbia (candidate country)
- Turkey (candidate country)

IPA III Budget

The budget of IPA III for the period 2021-2027 is estimated at 14.162 billion euros. In the second term of the IPA, the total budget was estimated at 11.4 billion euros. So there is a slight increase in the IPA III period.

One of the critical issues in considering the budget outlook is the elimination of country allocations in the IPA III. In previous IPA periods, indicative country allocations were determined based on country size and progress in the negotiation process. Therefore, each beneficiary country could predict approximately how much budget it could use in this 7-year period and what kind of project portfolio should be developed according to the available funds. In the new IPA period, a performance-based approach without country allocation will be followed. It is stated that there will be a fair distribution among countries under this methodology. It is expected that beneficiary countries (candidate and potential candidate countries) that take further steps in the EU accession process by implementing the necessary reforms, especially in the area of fundamental rights, and improving their capacity to manage funds, will benefit more from IPA funds. At this point, it is crucial to develop projects that are precise, qualified and based on real needs. However, it can be observed that the emphasis on fundamental rights has come to the forefront during the period of IPA III. Therefore, even if highly qualified projects are developed, it may not be possible to use more funds if the reforms, especially in the area of fundamental rights, are not implemented.

IPA III Priority Areas

5 main priority areas are defined for all beneficiary countries for IPA III period. These priority areas, called as windows, are as follows:

- Rule of law, fundamental rights and democracy
- Good governance, EU acquis alignment, good neighbourly relations and strategic communication
- Green agenda and sustainable connectivity
- Competitiveness and inclusive growth
- Territorial and cross-border cooperation

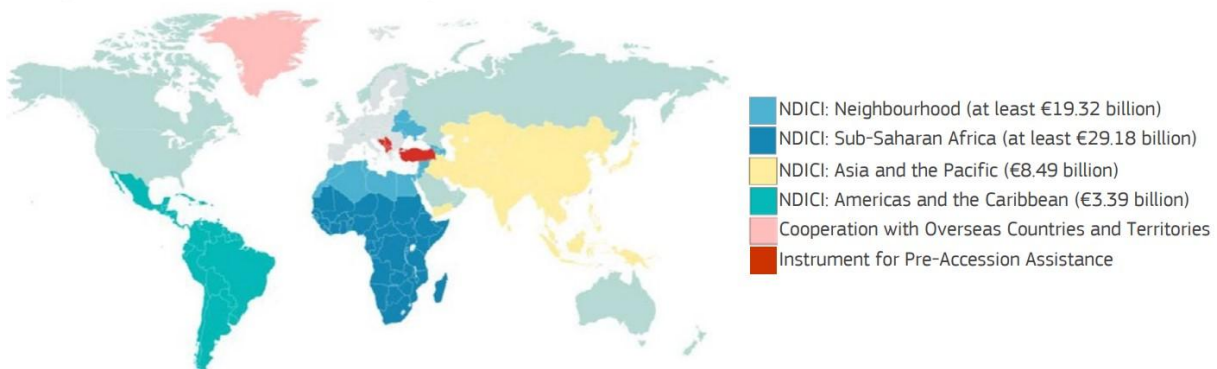
Before going into the details of these priority areas, brief information on the financial framework developed by the EU for the new period, the relevant regulations, the official documents, and the references to civil society in these documents are summarized below.

1. Neighbourhood, Development and International Cooperation Instrument-Global Europe

The "Neighbourhood, Development and International Cooperation Instrument, which entered into force on June 14, 2021, and will apply from January 1, 2021, brings together under one umbrella a number of financial instruments that the EU has used in previous periods. This financial instrument, with a total budget of €79.5 billion, covers the EU's international relations with all third countries. In this context, a three-pillar structure is envisaged.

The first pillar is called the geographical pillar and has a budget of 60.38 billion euros. The second pillar is called the thematic pillar and covers "Human Rights and Democracy, Civil Society Organizations, Peace, Stability and Conflict Prevention and Global Challenges" The last pillar is called the Rapid Response Pillar and was developed in response to criticism of the EU's ability to respond quickly to crises.

1. THE GEOGRAPHIC PILLAR will foster **dialogue and cooperation** with third countries, with a budget of €60.39 billion. Each regional envelope will be adapted to the needs and priorities of the respective countries and region, which will reflect the EU's strategic priorities.



In this context, the elaboration of a dedicated thematic program for civil society is one of the most important developments in the new period. On December 14, 2021, the EU Commission published a multi-annual programming document for the period 2021-2027 on this thematic program

The main objective of the CSO Thematic Program is to strengthen civil society organizations as independent actors for good governance and development. In this context, three priority areas are identified, namely,

- providing a favorable and facilitating environment for civil society,
- Improving civil society participation
- Strengthening the capacity of CSOs.

It is worth highlighting that these priority areas are also included in the overall structure of civil society support mechanisms in Turkey, as in almost all programs implemented by the EU at the global level. Although the details of this Thematic Programme are not analyzed within the scope of this briefing note, the inclusion of civil society as a separate thematic area in the EU's external policy is a significant development.

Support to civil society organizations at the global level is listed as an objective in the relevant Regulation, the main legal document for the entry into force of the "EU Neighborhood, Development and International Cooperation Instrument." However, there are clear references in the Regulation that require the EU Commission to work closely with CSOs and share information. In this context, the following critical statements are included under the heading of "Partnership":

- Promoting an enabling environment for civil society organisations and foundations
- Enhancing their meaningful, continuous and structured participation in domestic and international policies
- Enhancing their capacity to perform their roles as independent development and governance actors
- Strengthening multi stakeholder approaches and new ways of partnering with civil society actors
- Supporting democracy and expanding civic space

2. Regulation Establishing IPA III

The most important legal document for the period IPA III is the IPA III Regulation (Regulation establishing the Instrument for Pre-Accession Assistance). The said regulation was adopted on

September 15, 2021, entered into force on September 20, 2021, and applies retroactively from January 1, 2021. The IPA III Regulation is the main document containing the main regulations and rules for the new period.

In this context, the overall objective for the IPA III period is to assist beneficiary countries in adopting and implementing the political, institutional, legal, administrative, social and economic reforms necessary to comply with the Union's values and to progressively align with the Union's rules and standards. In this way, the aim is to contribute to mutual stability, security, peace and prosperity in order to implement policies and practices for EU membership.

With a similar approach, the specific objectives of IPA III include the development of a conducive environment for civil society and the thematic priorities of supporting the capacity, independence and pluralism of civil society organizations. Again, emphasis is placed on the inclusion of CSOs in the process with meaningful consultations, appropriate disclosure of necessary information, and the involvement of programs with meaningful participation in design, implementation, and monitoring. It also emphasizes the need to strengthen the role of civil society in projects implemented by recipient country public agencies.

The regulation also states that in the event of significant regression or long-term lack of progress in beneficiary countries, funding may be reduced and the funds indirectly shifted to civil society or local governments to support fundamental rights, democracy, and the rule of law.

In addition, it is useful to refer to a complementary Commission Delegated Regulation published by the EU Commission. The regulation was adopted on October 1, 2021 and entered into force on December 3, 2021. This regulation provides details on the thematic areas defined in the IPA III Regulation. The focus is on strengthening the capacity, independence and pluralism of civil society. Unlike the previous statements, this one emphasizes the issue of supporting youth organizations and social partners and strengthening cooperation with their counterparts in the EU, including public and private sector organizations.

3. IPA III Implementing Regulation

The IPA III Implementing Regulation, which was approved on December 15, 2021 and became effective on December 16, 2021, can be described as another important regulation. However, this regulation mainly deals with the technical arrangements between the beneficiary countries and the EU, including the IPA III administrative processes. However, the regulation states that civil society organizations can

also be involved in the IPA Monitoring Committee, which is formed during the IPA III implementation process. This Committee can be defined as a high-level structure established under the IPA management processes that is responsible for monitoring the overall effectiveness, efficiency, quality, coherence, coordination, and compliance in the implementation of all projects. Ensuring that CSOs are represented on this committee is one possible tool to increase civil society participation in the implementation processes.

Similarly, it is envisioned that Sectoral Monitoring Committees will be formed at a lower level. Sectoral Monitoring Committees are responsible for monitoring and coordinating projects in the sector concerned that are implemented directly by the Commission, in addition to projects implemented by the beneficiary countries. There are more binding statements on civil society participation in Sectoral Monitoring Committees. For example, while civil society participation in the IPA Monitoring Committee is limited to "where relevant", there is no similar statement for the Sectoral Monitoring Committees. Therefore, we can conclude that it is theoretically possible for CSOs to participate in the monitoring committees established in sectors related to their areas of activity.

4. IPA III Programming Framework

The IPA III Programming Framework is the main strategic document for the IPA III period prepared by the European Commission and replaces the Country Strategy Papers prepared separately for all IPA beneficiary countries in the previous period (IPA II). Therefore, the programming framework is a common document for all beneficiary countries.

5 windows are determined for IPA III:

Window 1: Rule of law, fundamental rights and democracy

Window 2: Good governance, EU acquis alignment, good neighbourly relations and strategic communication

Window 3: Green agenda and sustainable connectivity

Window 4: Competitiveness and inclusive growth

Window 5: Territorial and cross-border cooperation

These thematic areas are similar to the previous periods of IPA.

In this context, civil society as a horizontal theme is related to all Windows. However, Window 1 the Rule of Law, Fundamental Rights and Democracy, is the most important window for civil society. Within this window, the following areas are designated as thematic priorities:

- Judiciary

- Fight against corruption
- Fight against organised crime/security
- Migration and border management
- Fundamental rights
- Democracy
- Civil Society

In the IPA III period, as in the previous period, civil society is defined as a thematic priority or, to use the terminology of IPA II, a sub-sector. In the IPA III period, the aim is to strengthen the legal and policy framework for civil society, enhance the role of CSOs in decision-making processes, meet the basic needs of CSOs and strengthen their capacities, and raise awareness of the role and needs of civil society. Civil society is also considered to play an important role in the implementation of reforms in the EU process, which has come to the fore in the IPA III period.

Under **Window 2: Good governance, EU acquis alignment, good neighbourly relations and strategic communication** below thematic priorities are defined:

- Good Governance
- Administrative capacity and EU acquis alignment
- Good neighbourly relations and reconciliation
- Strategic communication, monitoring, evaluation and communication activities

The thematic priority of "good neighborly relations and reconciliation" is particularly relevant for the Western Balkans, and "strategic communication, monitoring, evaluation and communication activities" are also related to the management of EU funds. Administrative capacity and alignment with the EU acquis relate primarily to negotiation chapters and serve to strengthen the capacity of public institutions. In principle, it is possible to overcome the difficulties in decision-making processes in Turkey. However, it should be emphasized that this issue has "traditionally" not been discussed in Turkey within the framework of EU funds.

The overall objectives of Window 3 Green Agenda and Sustainable Connectivity are to promote the green agenda by reinforcing environmental protection, contributing to climate change mitigation, increasing resilience to climate change, accelerating the shift towards a low-carbon and circular economy, and developing the digital economy and society. The emphasis on the digital agenda and the green deal, which has come to the fore in the European Commission's objectives in the new period, has of course also come to the fore in the IPA III period as well.

In addition, Window 3 identifies two key focus areas: "Environment and Climate Change" and "Transport, Digital Economy and Society, and Energy."

The overall objective of EU assistance under Window 4 is to strengthen economic and social development, including through education, competitiveness, research and innovation, social inclusion, industrial and employment policies, with a particular focus on private sector development, agriculture, rural and industrial development. Within this window, there are 5 thematic priorities, namely:

- Education, employment, social protection and inclusion policies, and health
- Private sector development, trade, research and innovation
- Agriculture and rural development
- Fisheries

The last window is **Window 5: Territorial and cross-border cooperation**. The cross-border programs (the Turkey-Bulgaria Cross-Border Cooperation Program and the Black Sea Basin Cross-Border Cooperation Program) that we are familiar in Turkey are covered in this window. Although the official process has not been completed yet, we can say that the preparations for participation in the Mediterranean Cross-Border Cooperation Program are continuing.

Finally, under the programming framework IPA III, about 42.5 percent of the total budget of IPA III is allocated to the green agenda and sustainable connectivity.

IPA III Programming framework could be downloaded from below link:

https://ec.europa.eu/neighbourhood-enlargement/system/files/2022-01/C_2021_8914_COMMISSION_IMPLEMENTING_DECISION_EN.pdf

5. Strategic Response

All IPA beneficiary countries are required to prepare a Strategic Response Document simultaneously with the publication of the Programming Framework. This document is similar to the sector operational programmes prepared in the previous periods or to the sector planning documents prepared by the lead institutions of the relevant sectors. The said document was prepared by all member states and submitted to the European Commission in 2021. This document was also prepared

by Turkey, but we do not have information on whether this document will be made available to the public.

A consultation process within the scope of document preparations was carried out by the Directorate for EU Affairs in July 2021:

https://www.ab.gov.tr/stratejik-cevap-belgesi-kamu-istisare-sureci_52653.html

Considering the international standards for the consultation process, we can say that this consultation is not well structured. Although the survey is currently inaccessible, we could see from the published survey that only prioritization of the windows outlined above was desired. Furthermore, we could not find a final report on the consultation process. One can readily conclude that it is of great importance to provide at least a brief summary of the Strategic Response Document to the public and CSOs in order to properly inform them.

In the next phase, it is expected that a Framework Agreement will be signed between the EU and Turkey covering the IPA III period. After that, a Presidential Circular on institutional structures in Turkey will be issued, following a similar process as in previous IPA periods. Once these steps are implemented, we will update this page accordingly.

What is Programming? How is it Executed?

The process of determining which projects to include in the EU financial assistance is called programming. The programming process is largely a bureaucratic process carried out by IPA beneficiary countries and the European Commission. Therefore, it is generally not possible for CSOs to directly participate in this highly technical process and submit their project proposals. They can only make their views known through consultations that are held from time to time.

The programming process essentially begins with the European Commission inviting member states to submit project proposals. At IPA III, project proposals are collected in a document called Action Fiche. The coordination of the whole programming process in Turkey is carried out by the Directorate for EU Affairs. After the announcement of the indicative schedule for the programming process by the EU Commission, the Directorate for EU Affairs collects the project proposals through the organizations coordinating the relevant windows or priority areas. The Action Fiches prepared in accordance with these project proposals are assessed by the European Commission for their relevance and maturity. Following this assessment, they will be asked to prepare "Action Documents" for those projects found

to be mature and relevant, which may be defined as more detailed project documents. At IPA III, tender documents must be submitted in addition to the Action Documents. For example, if a public institution is planning a grant program for CSOs, the draft Guidelines for Grant Schemes for the proposed grant scheme should be prepared at this stage in addition to the Action Document.

Behind this methodological change is an effort to overcome the main problems from previous IPA periods. As a rule, the procedures for signing contracts must be completed within a maximum of 3 years after the end of the programming process. The preparation of technical documents and tendering procedures for EU projects are extremely tedious and lengthy. Delays occurred because the documents had to be prepared in English, the methodology used was different from the national implementation processes of the beneficiary countries, because the tender evaluation procedures were protracted, and because the responsible institutions sometimes did not show sufficient ownership and sometimes did not have sufficient technical capacity. In the worst cases, these delays meant that the funds allocated to the respective countries could not be used, that the administrative burden for the contracting authorities became unmanageable, especially shortly before the end of the contracting deadline, or that a large number of projects were waiting to be contracted. This innovation, introduced in the IPA III period, aims to solve such chronic problems.

After the beneficiary countries have prepared the Action Documents, a comment cycle is initiated between the beneficiary countries and the EU Commission to mature and finalize the documents. After this comment cycle, the finalized documents are submitted to the IPA Committee formed by the European Commission. An important change in the IPA III period is that input from EU Member States is now sought prior to submission to the IPA Committee, allowing Member States to be more involved in the process. It can be said that this change in approach is a result of criticism from EU member countries that in previous IPA periods they could not be involved in the development of programs and projects and that they could not see the projects until the programming process was almost completed.

Once approved by the IPA Committee, the Action Documents will be published on the website of the European Commission's Directorate-General for Neighbourhood and Enlargement Negotiations (DG NEAR).

In the next phase, the financing agreements will be signed between the IPA beneficiary countries and the EU. After the official entry into force of the aforementioned international agreement, the programming process will be completed.

2021 Programming Process

Having given this background information, we can move on to the programming process completed by 2022. As a result of the process we have tried to summarize above, the programming for 2021 has been completed and the corresponding Action Documents have been published on the European Commission website. As of April 2022, the process of signing the Financing Agreement is going on.

Before going into the details of the projects included in the 2021 programming, it is useful to inform about a double distinction that is important for civil society. Since 2017, the programming and implementation process related to civil society in Turkey has been largely carried out by the EU Delegation to Turkey. In this process, called direct management, public institutions (such as the Directorate for EU Affairs, the Central Finance and Contracts Unit) play a much smaller role. The programming and implementation processes are largely carried out by the EU. As far as civil society is concerned, this practice has been going on for much longer, especially in the Western Balkans. As a result of political developments in EU-Turkey relations since 2017, technical difficulties related to IPA implementation, and international and domestic criticism of EU support to civil society, the practice in Turkey has also been largely adopted directly by the EU. Thus, we have started to see many more civil society projects under the EU Civil Society Facility in the direct management model. The Civil Society Facility was established in 2008 to provide financial support for civil society development. Under the Civil Society Facility, the EU provides support to strengthen civil society capacity, increase cooperation and exchange of best practices between the EU and other regions, and enhance the role of civil society in the areas of democracy, human rights, social inclusion, and the rule of law.

The practice that has long been common in Turkey under IPA is called indirect management. Under this method, the programming and implementation processes are largely carried out by the public institutions of the IPA beneficiary countries. For example, the Central Finance and Contracts Unit, a public institution that has implemented many grant schemes for CSOs for many years, is the contracting authority established to implement this method in Turkey. Although direct management has been started for civil society projects, the practice of indirect management continues on a larger scale for other windows.

Bu bağlamda 2021 yılı programlaması kapsamında sivil toplum alanına ilişkin iki Aksiyon Belgesi yayınlandı. Belgelerden biri Sivil Toplum Aracı Türkiye kapsamında (doğrudan yönetim) diğeri ise AB Başkanlığının IPA II döneminde lider kuruluşu olduğu sivil toplum alt sektörü (dolaylı yönetim)

kapsamında yer alıyor. Her iki belgede yer alan projeler hakkında kısa bilgi aşağıdaki tablolarda yer alıyor.

In this context, two Action Documents on civil society were published as part of the 2021 programming. One of the documents falls under the Civil Society Facility Turkey (direct management) and the other under the Civil Society sub-sector (indirect management), for which the Directorate for EU Affairs is the lead institution in the IPA II. Brief information on the projects in both documents can be found in the following tables.

Civil society Sector 2021 Programming (indirect management)

Published Action Document can be downloaded from here:

https://ec.europa.eu/neighbourhood-enlargement/system/files/2022-01/C_2021_9734_F1_ANNEX_EN_V1_P1_1671769.PDF

Activity/Project	Budget (Euro)	Year
Women Friendly Cities III	5 million	2021
Turkey-EU Business Dialogue II	6 million	2021
TOTAL	11 million	

Civil Society Facility Turkey 2021-2023 Programming (direct management)

Published Action Document can be downloaded from here:

<https://ec.europa.eu/neighbourhood-enlargement/system/files/2021-12/AD%2008%20TK%20CSF%20and%20Media%202021-2023.pdf>

Activity/Project	Budget (Euro)	Year
Resource Centre for CSOs in Turkey	3 million	2023
Sivil Düşün VI: Support mechanism for civil society organisations and activists	7 million	2023
Supporting Human Rights Defenders	4.4 million	2023
Monitoring of Freedom of Association-II	1.5 million	2023
Support CSOs working on human and fundamental rights	6 million	2022
Empowering women and girls	5 million	2022
Gender equality monitoring through rights-based CSOs	2.5 million	2022
Advancing the rights of LGBTI+	1 million	2022

Stronger Civil Society for Stronger Accountability on Child Rights in Turkey: Improving Monitoring, Engagement and Advocacy at Central and Local Levels	6 million	2021
Support to media freedom	4 million	2023
Support to Independent Media Outlets	2 million	2021
Supporting cooperation between municipalities and CSOs on cultural issues	3 million	2021
Supporting Cultural Initiatives As a Mean to Promote Freedom of Expression, Dialogue, Tolerance and Fight Against Discrimination	5 million	2023
Promoting Labour Rights in the Changing World of Work	5 million	2021
Civil Society Action Towards European Green Deal	5 million	2022
Green Local Action	4 million	2022
Disaster Risk Management	2 million	2022
Support Measures	0.6 million	2022 (300 k) 2023 (300 k)
TOTAL	67 million	

In addition, you can access the programming documents of all projects implemented under IPA in Turkey through the link below:

https://ec.europa.eu/neighbourhood-enlargement/enlargement-policy/overview-instrument-pre-accession-assistance/turkey-financial-assistance-under-ipa-ii_en

You can access the programming documents of the projects implemented under the EU Civil Society Facility at this link:

https://ec.europa.eu/neighbourhood-enlargement/enlargement-policy/overview-instrument-pre-accession-assistance/multi-country-financial-assistance-under-ipa-ii_en

The IPA III process is not limited to the thematic priority of civil society. Budget information for projects in other thematic priorities included in the 2021 programming can be found in the table below:

2021 IPA III:

Activity/Thematic Priority	Budget (EU Contribution) (Euro)	Total Budget (Euro)
EU Support for Participation in EU Programmes and Agencies	30.157.000	75.392.500
Civil Society	11.000.000	
Product Safety in E-Commerce	2.250.000	
Environment and Climate Change	20.000.000	22.206.000
Sustainable Green Energy and Transport	20.000.000	70.000.000
Employment, education and Social Policies	19.293.000	19.413.000
Smart and Sustainable Economic Transformation	17.300.000	20.354.823

Comparison of Turkey and other IPA beneficiary countries:

CSF Budget

Country	Allocated budget (2021-2023)
Multi Country Programme	99.650.000
Albania	9.975.000
Bosnia and Herzegovina	9.500.000
Kosova	7.970.000
Montenegro	6.850.000
North Macedonia	9.800.000
Serbia	17.200.000
Turkey	67.000.000

A brief assessment for civil society

For CSOs in Turkey, the EU remains the most important external donor. Considering the fluctuations in Turkey-EU relations (or shall we say the almost frozen situation in relations) and the rapidly changing global agenda, we see that the importance of civil society in EU-Turkey relations and the EU's emphasis on civil society are increasing day by day. These developments are of course reflected in the financial resources allocated to civil society. If we consider together the funding of 67 million euros for the period 2021-2023 under the Civil Society Facility and the projects programmed by the Directorate for EU Affairs amounting to 11 million euros, we find that a total of 78 million euros has already been allocated for three years. Although this amount is limited, it is possible to increase it a little more with

the projects that can be programmed by the Directorate for EU Affairs until 2023. Of course, this amount will increase even more until 2027, the end of IPA III.

This means that we will see more and more grant programs from which civil society organizations can benefit directly, or sub-grant programs implemented through international organizations and organizations with relatively high capacity. Again, capacity building support will be available to civil society organizations through these projects. EU projects that have been successfully implemented for many years (Sivil Düşün/Think Civil, STGM supports, TACSO project, etc.) will also continue in the coming years.

In order to benefit from these grant programs and prepare more qualified applications, it is useful to have a good understanding of the information we have tried to summarize above. At the very least, it is very important to know how to access the relevant documents when needed. Many calls for proposals that CSOs respond to or apply to are filtered through the programming process.

On the other hand, while the increasing emphasis on civil society and the allocated funds are positive developments for CSOs, we can also say that there is room for improvement. In particular, we see that civil society participation in the programming process or in the development phase of these projects is very limited.

This limitation begins with the obligation of public institutions to provide information. It is very difficult for many CSOs to obtain accurate information unless they are experts in the field. Apart from some well-intentioned initiatives, we can also say that consultation processes are very limited and not well structured. Consequently, many steps need to be taken to increase the participation of civil society, to develop accurate and needs-based projects, to act with a more strategic perspective, and to solve the chronic problems of civil society. At this point, however, it should not be forgotten that EU projects are only one tool and that the problems of civil society organisations can only be solved through the internal dynamics of Turkey and civil society.