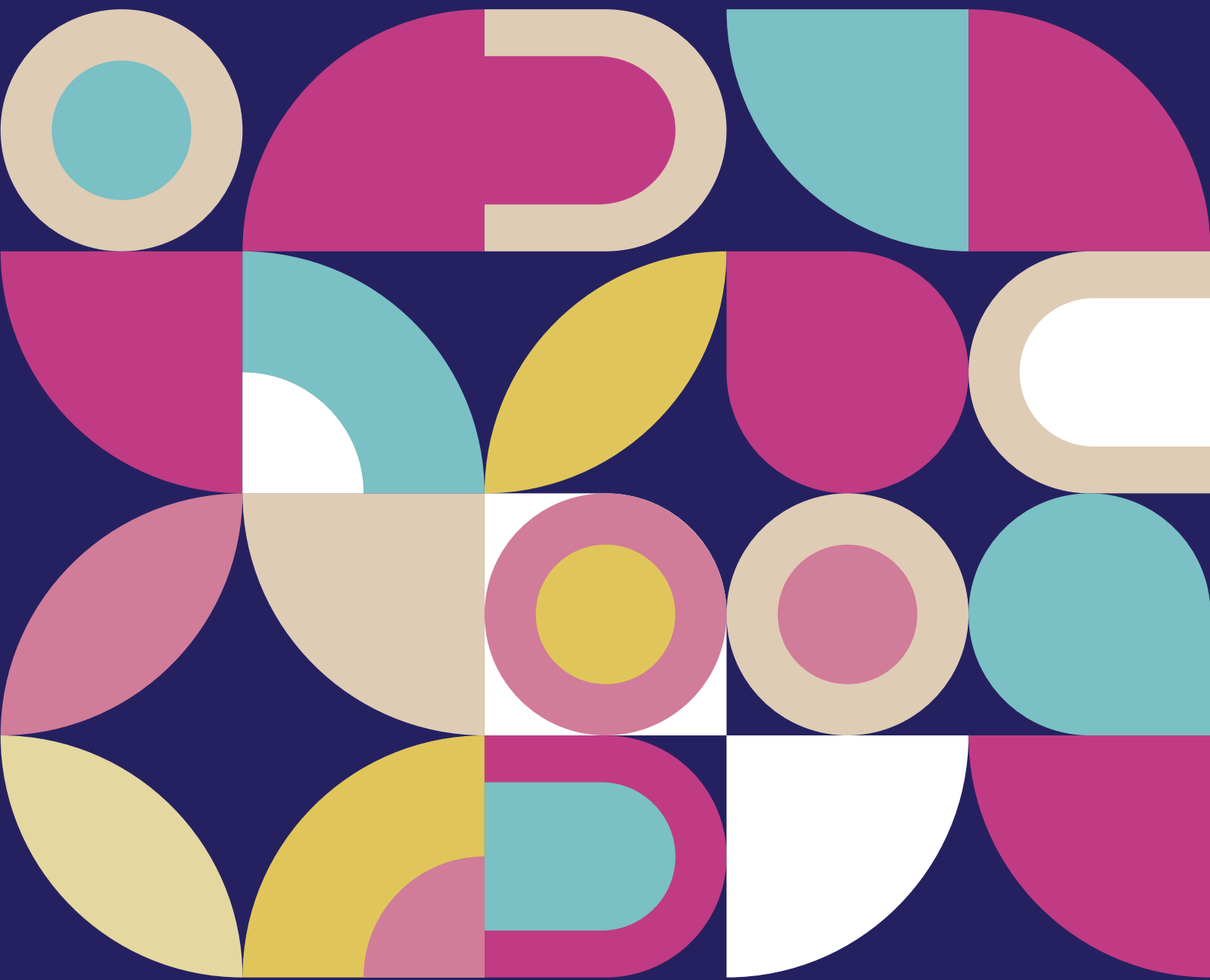# Non-governmental organisations in the regions under the control of the »Autonomous Administration of Northern and Eastern Syria«

Work priorities, challenges, shortcomings

Extended Version

Siamend Hajo, Jelena Kolar & Eva Savelsberg

2024
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The existence of non-governmental organisations (NGOs) in Syria is relatively new. Before the start of the Syrian revolution in 2011, there were only government-affiliated NGOs, which were unregistered and therefore illegal organisations. Since then, the civil society landscape in Syria has gone through different phases, depending on the time and place.[1]

This study examines the situation with civil society organisations in 2023 in regions under the control of the Autonomous Administration of Northern and Eastern Syria. Although the Administration is dominated by the Democratic Union Party (PYD), the sister party to the Turkish-Kurdish Kurdistan Workers' Party (PKK), the regions it administers are not only predominantly Kurdish regions. They also include the Arab regions around Deir ez-Zor and Ar-Raqqah, the predominantly Arab region around the city of Al-Hasakah, and the predominantly Kurdish Jazira region, which included the cities of ʿAmuda before the Syrian revolution, Dirbêsî (Ad-Darbasiya) and Serê Kaniyê (Raʿs al-ʿAin) as well as Qamişlo (Al-Qamishli), Tirbespî (Al-Qahtaniya) and Dêrik (Al-Malikiyah), and the region around Kobanî (ʿAin alʿArab), which is still predominantly Kurdish. The regions around Sêrê Kaniyê (Ras al-ʿAyn) and ʿAfrin, which were also predominantly Kurdish before the Syrian revolution, are not part of the Autonomous Administration of Northern and Eastern Syria but are controlled by Turkey.

The starting point for our research was a list of NGOs that the ECKS received in spring 2023 from contacts in the Autonomous Administration of Northern and Eastern Syria. In October 2022, a total of 415 NGOs were registered with the Autonomous Administration. The majority, 336 organisations, were local, 70 were international organisations, and in some cases no information was available. Two hundred eighty-four registrations were active, 33 were in progress, 93 had expired and three had been deregistered. These were organisations working in both the humanitarian and social sectors. No media organisations were listed.

We sent all NGOs a questionnaire on WhatsApp with a total of 23 questions. In total, there were four topics: a) the focus of their work, b) their funding, c) their internal structures and d) the difficulties they face in carrying out projects. Most of the questions were closed-ended, although some were open-ended. A total of 113 organisations participated in the survey. As 16 of them had not carried out any projects in the last two years (2021/2022) (14 per cent in total), the questionnaire was closed for them after this question. This left 97 NGOs that completed the questionnaire—although they were also given the option to skip questions.

To complement the quantitative study, we conducted five semi-structured expert interviews in August 2023 with one media professional (MK1), three senior staff from two smaller and one larger local NGO (NK1, NK2 and NK3) and one representative from the Administration (VK1). All respondents were from the (formerly) predominantly Kurdish regions. The expert interviews focused primarily on the challenges NGOs in northern and eastern Syria face in

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1 See the various studies on the development of NGOs in Syria between 2015 and 2021 published by Impact and available at https://impactres.org/mapping-civil-society-actors/.

carrying out their projects and how they assess the requirements set by the Administration. In addition, three semi-structured interviews were conducted in December 2023 with senior staff at NGOs working in the Arab regions of Ar-Raqqa, Deir ez-Zor and Al-Tabqa, which are also under the control of the Autonomous Administration of Northern and Eastern Syria (NA1, NA2, NA3), as well as with a senior employee from a civil council in the region (VA1).

In the following, we will first describe the regions and thematic areas in which the organisations responding to the survey primarily work and who their target groups are. The second step will analyse the difficulties they face in their work. The focus will be on the differences between the predominantly Kurdish and Arab regions. Finally, conclusions will be drawn on how international donors can address these difficulties.

Who works where and for whom: An initial overview

As mentioned above, a total of 97 NGOs that were active in 2021 and/or 2022 responded to our survey. We assume that the more active NGOs were more likely to respond to our questionnaire, i.e. that among the NGOs that did not respond, there are proportionally more organisations that have not carried out projects in the last two years. The statements by the experts we interviewed also speak in favour of a relatively large number of registered but de facto inactive NGOs:

>Local NGOs receive little money. Many exist only on paper.« (MK1)

>Many of them [the NGOs] have stopped working because they had these problems with the Administration and they didn't get any project money.« (NK1)

>There were once as many as 500 registered organisations. There are about 10 organisations that are active and effective. It isn't 20 organisations. I'm talking about those working in the Kurdish regions.« (NK2)

>Anyone who wants to be involved in civil society has to register. Many are willing, but they don't necessarily have projects in mind when they register.« (NK3)

>The organisations in Ar-Raqqa are divided in two. We have the international organisations that are always active [...] and the active local organisations. There are no more than thirty local ones. Most of the local organisations are not active, but they are large in number. I can say that about thirty organisations are active and have projects. There may be even less than thirty active local organisations.« (NA2)

These statements were confirmed by the two administrators we interviewed:

>By the end of 2023, there were 139 organisations [in Ar-Raqqa] that were licensed and working in different fields. [...] This does not mean that all organisations are active. Today, there are organisations that are not active and are waiting to work and are in contact with donors and supporting organisations and are trying to get grants and funding.« (VA1)

>There are either small projects in Jazira or most [NGOs] have no projects. The big projects are going to Ar-Raqqa and Deir ez-Zor. In Jazira, organisations have a hard time getting projects. In Jazira, 100 of the 300 [registered organisations] are working at most.« (VK1)

This statement leads us to ask in which regions the NGOs we interviewed were mainly active (multiple answers were possible). The following picture emerged: There were 33 responses for Ar-Raqqa and its surroundings, 32 responses for Deir ez-Zor and its surroundings, 23 responses for Qamishli (Al-Qamishli), Tirbespî (Al-Qahtaniya), Dêrik (Al-Malikiya)and its surroundings, 10 responses for Al-Hasakah and its surroundings, 9 responses for ʿAmuda, Dirbêsî (Ad-Darbasiya) and Sêrê Kaniyê (Raʿs al-ʿAin) and their surroundings, 5 responses for Aleppo and its surroundings (here some regions are still under PYD control) and two responses for Al-Tabqa (near Ar-Raqqa).

The fact that there are significantly more NGOs and/or projects in Ar-Raqqa and Deir ez-Zor, or that the 'big projects' go to these regions, is not least due to the fact that international donors became active there earlier than in the predominantly Kurdish regions. After the liberation of these regions from Islamic State (IS) in autumn 2017, it was hoped that IS structures could be dismantled more sustainably if the people living there had better access to social and other services. For the USA in particular, the fight against IS was and is the only reason for a medium-term commitment in Syria. The fact that both Ar-Raqqa and Deir ez-Zor have experienced armed conflict, with the corresponding impact on infrastructure, also made reconstruction appear more urgent than in the Jazira region, where this was not the case.

The NGOs surveyed were asked to identify their main areas of activity (multiple answers were possible). The most frequently mentioned areas were peace and justice (45 responses), followed by economic growth (40 responses), education and training (40 responses), gender equality and health (38 responses each), climate change (36 responses), food security (31 responses), poverty reduction (30 responses), sustainable cities and communities (29 responses), water and sanitation (26 responses), renewable energy (16 responses), innovation and infrastructure (15 responses), global partnership for sustainable development (7 responses) and other (24 responses).

It is striking that classic humanitarian areas such as healthcare, food security, poverty reduction, innovation and infrastructure are of great importance. This is in line with the statement by one of our respondents (NK3) that since the withdrawal of UN aid, there has been increasing pressure to engage in humanitarian aid. Instead of focusing on empowering women and youth or discussing a future Syrian constitution, the population is increasingly demanding humanitarian engagement. Unfortunately, this study does not allow us to draw any conclusions about whether there are regional links—for example, whether traditional humanitarian issues (still) play a greater role in Ar-Raqqa and Deir ez-Zor than in the Kurdish regions. At the same time, it is clear that issues such as gender equality and climate change are also important—especially when compared to the priorities of the Syrian-Kurdish parties, for whom these issues play little role.[2] NGOs appear to be bringing new priorities to the region and taking on tasks that are not, or hardly, being addressed by traditional political actors.

Apart from the 'whole community' (64 responses), the target groups of the NGOs are above all young people and young adults (51 responses), women (47 responses), children (28 responses), internally displaced persons (32 responses) and people with special needs (8 responses). The responses are in line with expectations, as young people, women and children are often the target groups of social projects.

The NGOs that indicated that particular ethnic or religious groups had benefited from their activities mentioned Arabs (56 responses), Kurds (28 responses), Turkmen (22 responses)

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2   See Eva Savelsberg, Jelena Kolar and Siamend Hajo, September 2023, 'Kurdische Parteien in Syrien: Entwicklungen, Dynamiken, Positionen' (Kurdish parties in Syria: Developments, dynamics, positions) (2011-2023), p. 11ff, available at https://power-sharing-syria.ezks.org/wp-content/uploads/2023/11/Kurdische_Parteien_Syrien_DE-1.pdf (in German only).

and Assyrians (21 responses) or Muslims (47 responses), Christians (30 responses) and Yazidis (28 responses). Multiple responses were also possible.

As the survey does not allow the data to be related to the regions in which the projects were implemented, the data is only partially meaningful in terms of possible preferential treatment of certain groups. At the same time, it is striking that the small ethnic minorities from the region (Assyrians and Turkmen) are clearly over-represented, especially when compared to the larger minority of Kurds. The same is true for Yazidis compared to Christians and Muslims. More research is needed here, but we suspect that international donors and the diaspora communities for these groups have a particular interest in supporting projects for these small minorities. Many aid projects for this group have been established in Iraqi-Kurdistan, especially in the years since the Islamic State attacked Yazidi-populated regions of Iraq in 2014, kidnapping and killing thousands of Yazidi women and girls. Although the focus on Yazidis described above is still surprising given the small number of members in this religious community, it is possible that this is a similar process.

Challenges for the work of NGOs

The areas in which the NGOs surveyed see the greatest problems in carrying out their projects are discussed below. These were underfunding (41 responses), lack of financial resources (12 responses), legal and administrative requirements (11 responses), infrastructure (11 responses), recruitment of suitable staff (9 responses) and security (6 responses). Again, multiple responses were possible.

Underfunding or lack of funding

The biggest challenge is therefore the funding of projects, i.e. underfunding or lack of funding. All other categories received similar responses, with a slight decrease in the category 'Security'. The experts we interviewed from the Kurdish region confirm the difficulties local/national organisations face in raising sufficient funds:

> »There are many registered organisations, but not all of them have received money for their projects. Very few have, and that's why they only exist on paper.« (NK2)

They point out that many projects are funded for very short periods of time, such as six months. When the project ends, there are often funding gaps and staff have to be laid off. To bridge such gaps, projects would build up so-called 'reserves'—by claiming higher expenses for wages, services and goods from donors than were actually incurred.

Another problem with funding, according to one of our respondents, is that too little of the project money actually reaches the region itself:

> »For example, an international organisation may receive one million US dollars, and not even 200,000 US dollars arrives in Qamishli, for example. The project manager is an American living in the United States. He gets, for example, 25,000 US dollars a month. He has two deputies, each of whom gets 10,000 US dollars a month. They have rental costs there and maybe only 200,000 US dollars arrive in Qamishli. There is also an office and staff in Qamishli and so on. As you can see, most of the money goes into bureaucracy and not into the project. I think this

is the main reason why NGOs are not very effective. Even though there is some money.« (NK1)

However, the respondent did not see this as a problem specific to the region, but rather as a general problem in development aid.

Financial problems are also cited as a major challenge in the Arab regions—the decline in funding is explained by international political developments:

> »The withdrawal of the Americans from some regions in north-eastern Syria and also the war in Ukraine had a big impact on the funding of NGOs here. The situation is not the same as before. The Americans and the international coalition against ISIS are now investing a lot of money in Ukraine or for Ukrainian refugees/displaced persons. The biggest challenge at the moment is the war in Gaza, and that's where most of the money is needed. And as always, north-eastern Syria has the smallest share of funding in the whole of Syria.« (NA1)

> »I follow the work of the associations in north-eastern Syria closely. No one is hiring more staff. No one is carrying out more projects. Since no more work or projects are being carried out, they publish old projects to give the impression that they are still doing something. And that's just to keep them attractive to donors and international organisations. For example: yesterday a friend of mine, the director general of an association—his association was founded in 2018—told me that he hasn't been able to pay the rent for the association's premises since January, that he is in danger of having to give up. Look, the association has been in existence for seven years, not just one or two. After seven years of carrying out major projects and raising hundreds of thousands of US dollars from international donors, they are in danger of giving up. They can't even pay the rent anymore. The global political situation is affecting funding, that's undeniable.« (NA1)

The respondent points out the inequality in project funding in the Kurdish and Arab regions:

> »The fact that no projects were funded in the Kurdish regions has added another layer of tension to the highly sensitive conflict between Kurds and Arabs. The excuse has always been that there is no war in the Kurdish regions like in Ar-Raqqa and Deir ez-Zor! But that's not the truth. The truth is that Turkey and its interests and the political situation did not allow projects to be funded in the Kurdish regions.« (NA1)

The reason for the lack of funding is not only the reduction in available funds, but also the significant increase in the number of NGOs:

> »Honestly, after the SDF liberated Ar-Raqqa in 2017, there was a lot of support for many local and international organisations. There were about 30 organisations then, but today there are 139.« (VA1)

This means that fewer funds need to be distributed to more applicants, especially in the Arab regions, which makes funding even more difficult[3].

Finally, competition between local and international organisations is also perceived as prob-

3   In fact, international aid for Syria has plummeted in recent years—at the 7th Brussels Conference in June 2023, Western donors pledged a total of 5.6 billion euro, compared to 6.4 billion in 2022. See ReliefWeb, 15/06/2023, 'Syria and the region: International community mobilises €5.6 billion during the 7th Brussels Conference', 15/06/2023, available at https://reliefweb.int/report/syrian-arab-republic/syria-and-region-international-community-mobilises-eu56-billion-during-7th-brussels-conference.

lematic in the Arab regions, especially when it comes to recruiting staff:

> »Nowadays, a project with international organisations costs 500,000 US dollars, which means that salaries cannot exceed 25 per cent of the project. This would mean 100,000 US dollars [actually 125,000] for salaries alone. Local organisations can receive 20,000 US dollars for a project. If 25 per cent is for salaries, that means 5,000 US dollars. That is not enough for a finance director, a project manager, a financial controller, a public relations officer and logistics. [...]

> The people who didn't have a chance in international organisations came to local organisations, but when they get another chance, they don't stay in local organisations because there are no permanent projects in local organisations.« (NA2)

Lack of qualified staff

Another problem in carrying out projects mentioned in the quantitative study is the difficulty in finding qualified staff. This difficulty does not relate to the way NGOs advertise positions:

- Posting jobs on social media (Facebook, LinkedIn, Instagram)

- Posting in the organisation's premises and at local authorities, as well as posting on official websites and job portals

- Specific internal procedures where the requesting department submits an application to the human resources department and the latter advertises it internally or externally.

- Some organisations stated that they do not advertise vacancies because they do not currently have any vacancies or their work is carried out by volunteers.

Our expert interviews suggest that the lack of qualified staff is at least indirectly related to the funding of local/national NGOs or competition from international NGOs:

> »I have a big problem with international organisations. They make our work very difficult. For example, they sometimes pay salaries of 1,500 US dollars. We don't have much money and for the salaries we can pay, [people] don't want to work for us [...] We [train them] and after six months we lose the people to the international organisations because they pay them 1,000 to 2,000 US dollars [a month]. We've had this problem a few times. We find a good team, but after only six months they leave us, often to go to Ar-Raqqa.« (NK2)

> »Larger NGOs pay more, so it's difficult to keep good people for long. They learn from local NGOs and then go to international NGOs.« (NK3)

> »Staff turnover is a challenge for us. We can't always keep them because our funding is constantly decreasing. The main problem is that projects aren't sustainable. Local organisations take on projects that only last four to six months. After that, if they don't have any more projects, the staff just leave and don't stay with the organisation. If there's no funding, the organisation has to close down. We train them, everything takes effort and in the end they go to another organisation without the organisation that invested in them benefiting from their work.« (NA2)

Whether the salaries paid by local NGOs are sufficient to cover the living expenses of staff was only discussed by our respondents in the Kurdish regions, and their assessments varied.

While MK1 considered 200 to 400 US dollars to be entirely sufficient, NK3 considered 400 to 500 US dollars to be far too low, given the much higher cost of living. It's also worth noting that even the salaries paid by local NGOs are considerably higher than those paid by the Autonomous Administration. In August 2023, the salary of a university professor was only around 100 US dollars. The migration of good staff from local NGOs to international NGOs is likely to be mirrored by a similar movement from the Autonomous Administration to local NGOs. On 1 September 2023, the Autonomous Administration doubled all salaries (but abolished petrol subsidies). However, the driving force behind this decision was probably not staff departures, but rather unrest in the Druze regions due to the high cost of living.

Administrative requirements of the Autonomous Administration

Another problem mentioned in the quantitative survey was the complexity of legal and administrative procedures and regulations imposed by the Autonomous Administration.

An Autonomous Administration employee in the Kurdish regions described the registration process as follows: 'Since 2019, the registration of an NGO, regardless of the location of its headquarters, has to take place in person in Ar-Raqqa. The names and addresses of the founding members, the organisation's articles of association and the founding protocol have to be submitted. The initial registration is valid for six months, followed by one year and then two years. Renewals also require an in-person visit to Ar-Raqqa. This centralised registration is a new development; previously, registration was possible in individual regions of northern and eastern Syria. There were offices for this purpose in the regions of Furat, Shahba, Kobanî, Ar-Raqqa, Deir ez-Zor and Jazira. However, these offices could only issue permits for activities within their respective regions, while the registration in Ar-Raqqa was valid for all regions.

In addition to registering the organisation itself, each individual project must also be registered with the region in which it will be carried out. What is more, each project activity must be approved. VK1 justified these measures by citing both the security situation in the region and the need for the Autonomous Administration to verify that organisations are actually carrying out their work as planned:

> »I mentioned that the organisation needs to register. And then the same for each project and each activity. They [the NGOs] have to get permission for every activity, like if you want to hold a conference. The security situation in that region is unstable. You might need protection. So we also need permission from the security services. It's partly about security. Then we also want to know if the organisation is actually going to carry out the activities described in the project. For example, you wrote in your project description that you were going to hold seven workshops. So, did you really hold them? We get a written application for each workshop and we approve it. Sometimes it is approved the next day, sometimes it is approved immediately. Ideally, a written application should be submitted with a stamp and signature.« (VK1)

In addition to registering activities with public attendance, all participants have to be identified. For workshops, for example, all invitees need to be listed in advance. This is justified by the need to ensure equal opportunities. In reality, however, the Administration is interfering in matters that should only be of interest to donors:

> »There are organisations that always invite the same people. They should include

other people. We tell the organisations that they need to invite other people. Or one person is repeatedly invited by different organisations. They should also give others the opportunity.« (VK1)

Moreover, attention is drawn to the fact that only authorised persons are allowed to participate in the events:

>We do this because we want to control it and know who is coming. We cannot compare it with Germany. The security situation here is not comparable. If something happens in the hall, we need to know who was there. We give them permission, so we need to know who is there. […] Secondly, [there could be] certain media representatives who are not welcome. Rudaw, for example, has had its registration revoked. It's a problem, for example, if someone from Rudaw attends. Or parties attend that are not registered with us. We don't allow them to participate. They can participate as individuals, but not as representatives of their party. That's the truth.« (VK1)

In addition to the information that NGOs have to provide to the Administration in advance, events are also checked on the spot and can be banned:

>It has happened that [an organisation] has held big events with two hundred people and told us that some of them are also from the opposition. We've [sometimes] allowed it, and at other times we have forbidden them to hold an event. It depends on the political situation. We also attend and as soon as we notice that something is not right, we intervene. Or perhaps a discussion topic issue is registered and then something else is being discussed. Then we intervene and stop.« (VK1)

These statements make it clear that the Autonomous Administration controls all NGO activities—to ensure that unregistered parties cannot participate in activities such as training courses or similar, or that unregistered media do not report on these activities.

Finally, the Administration also influences the results of surveys and studies. For example, Article 12 of the amended Humanitarian Organisations Act of September 2023 states:

>The following are prohibited for associations and organisations registered under this act:

[…] 5. Publishing the results of opinion polls without first submitting them to the Office for Organisational Affairs responsible to verify their accuracy and neutrality. […]«

In addition to monitoring existing projects, the Autonomous Administration also influences the design of projects before they are even submitted.

>First we take stock of what the Administration needs. For example, a town hall might say that this is what we need and that our budget does not allow for it. These needs are communicated to the organisations. We do this before they submit their applications to their donors. […] We have ready-made projects that we give them. We have meetings with the organisations every three months. For example, one organisation's remit is agricultural projects. We give them agricultural projects and ask them if they can carry them out.« (VK1)

VK1 emphasised that organisations are not forced to carry out projects. At the same time, it is

obvious that if the body responsible for approving and controlling the activities of an organisation regularly asks for projects, there is an increased willingness to comply. This is also made clear when VK1 mentions that organisations sometimes come to the Administration themselves and ask what they need:

> »But very often [organisation X] comes to us and asks what we want. We say this committee or that administrative unit has a need. They go to them and then they do something together or support that administrative unit. They then build their projects according to the needs of the administration.« (VK1)

For one, it makes sense to work with local institutions to design projects, which increases the likelihood that they will meet the needs of the people involved. At the same time, however, influencing projects before they are designed and submitted is another way of influencing them and, in particular, of ensuring that certain politically unpopular individuals, groups, organisations or administrative units do not benefit from NGO support.

The question is to what extent (1) the rules outlined above are applied in the same way to all NGOs, and (2) how individual NGOs deal with the restrictions imposed by the Autonomous Administration.

Our interviews with experts suggest that the implementation of the regulations is not uniform across NGOs: For example, an employee from a relatively small NGO told us:

> »We've had a lot of problems with registration. We have been waiting for it for a year now. We told them that they are neither supporting us financially nor in any other way, and they are making it impossible for us to work. Now they have promised that we will get registration for six months.« (NK1)

Not only can registration itself be difficult, but registering specific activities can sometimes also be time-consuming:

> »First you have to get a certificate of no objection from the place where you are registered. You then have to take this to the branch of the [Office for] Organisational Affairs [where] you want to carry out an activity. And if they agree, you can go ahead.« (NK1)

In addition to formal certificates of no objection, other permits may be required, as described in the following episode:

> »Let me tell you about a project so that you can see how problematic it is. Last year we wanted to plant trees in a number of schools. We went to the Office for Organisational Affairs. We got a certificate of no objection. They told us that we needed a permit from the Ministry of Education [as well]. There they first said that they couldn't do anything because the people responsible were in a meeting. The next day they said that was the leader's [Öcalan] birthday and that because of demonstrations nobody is there. The day after that they were in a meeting again. At some point we did get the signature we need. They then said that we also need a permit from the Ministry of Higher Education. Then they said we also need security clearance. The two of us spent four or five days trying to get permission just so that we could plant a few trees.« (NK1)

A member of staff from a larger local NGO that has been working in the region for many years and has a partner organisation in a European country, described the challenges as less difficult.

NK3 pointed out personally that it is easier to obtain certificates of no objection for activities if you are a larger organisation and have permanent offices in different places in north-eastern Syria, because then you only have to visit one authority when applying, not two. It also helps to have structures abroad, as the Autonomous Administration treats you with more respect when you 'call from Europe'. Their organisation also has few difficulties because it carries out many projects together with the institutions of the Autonomous Administration. Good relationships with the Autonomous Administration authorities are always helpful. Their organisation can now have activities approved over WhatsApp, rather than having to go to the Autonomous Administration offices. Overall, there is a certain arbitrariness to the approval of activities.

This is confirmed by another respondent:

»Not everyone wants to have [the names of event attendees] all the time. It depends on the person in the office. But Qamishli always wants to have all the names in advance.« (NK2)

Our media sector respondent put it like this:

»If you know the people and have the right knowledge, it's easy to register an NGO.« (MK1)

Are the restrictions imposed by the Administration perceived as such by NGOs, and how are they assessed? The member of staff at one of the two small NGOs commented on the red tape in the work NGOs perform in the following way:

»You have to move within their political line and you are not allowed to criticise their policies too much. There must be no mention of a [single] party in power, and there must be no question of its ideology. The leader is absolute taboo. For example, no NGO would ever dare to make Öcalan's ideology the subject of a seminar. If that happens, it's over for the organisation.« (NK1)

The same restrictions would also apply to the media:

»We were talking about NGOs that work in public relations. They can't work completely freely. They can't report on a large number of important issues. They have to subordinate themselves to the politics and ideology of the Administration. For example, there were important events taking place in Deir ez-Zor. The [XY, an important press organ], which receives a lot of support [from abroad], did not report this because the Administration does not want it to.« (NK1)

The media worker we interviewed expressed similar sentiments: There is red tape, the party and the leader cannot to be placed in question. At the same time, they justified this practice by saying that the public did not want critical reporting in this area either. Certain things do not go down well in society and are not accepted, so they can be left out. The point is to design a programme for the community, not to pursue an agenda. Their medium only ever had one problem with the Administration, around 2013, when they did not want to use the term *shahid*, or martyr, for PYD or PKK fighters who had died in battle. In their view, it was not a professional term. But since both the PYD and the Iraqi-Kurdish organisations used this term and it was also accepted by the public, they finally decided to use it as well.' (MK1)

The interview clearly shows that free political reporting is not possible in the regions under the control of the Autonomous Administration—this is justified by the fact that this is

not a real problem, since the public have no need for a free media.

One of our respondents from a larger NGO criticised the bureaucracy in the Autonomous Administration, saying that you never know what's going to happen and that there are always problems, especially when it comes to changing certain processes. At the same time, they pointed to improvements in recent years. For example, hiring permanent association staff, such as programme managers and finance officers, used to require the Autonomous Administration's approval and this is no longer the case. It used to be forbidden to hold events on public holidays because no one from the Autonomous Administration would be on duty to monitor the events. This rule has also now been changed. Our respondent also described how the Administration officials who are supposed to supervise their seminars are often young people who are enthusiastic about the events. They would ask to be allowed to participate actively in the workshop—and, according to the subtext (NK3), forget their monitoring function. (NK3) Apart from the fact that the respondent's organisation, as an NGO with very good contacts, has relatively few problems with the Administration, one gets the impression that the existing restrictions tend to be played down or have already been internalised to such an extent that they are perceived as normal.

Our contacts in the Arab regions were also asked about problems with the Autonomous Administration. However, in contrast to our Kurdish respondents, these were not the main focus. For example, when asked if it was difficult to register an organisation, NA1 replied,

> »No, meeting these requirements [is not difficult].«

This is not because the rules are fundamentally different. Even in the Arab regions, NGOs have to register and obtain separate permits for each type of activity:

> »So, as I said, we can't do anything without a permit, even if it's just an evening of talks that doesn't cost anything.« (NA3)

Furthermore, NGO activities in Arab regions should not be affiliated with political parties and should be exclusively humanitarian:

> »The organisations should be independent; their activities should only take place in the humanitarian area. So no politics and no connection to political parties [...].« (VA1)

A statement was also made that projects with an ethnic or religious orientation are prohibited (VA1, NA1)—a statement that was not made directly by our Kurdish interlocutors—but it is likely to be the case there as well.

We suspect that the differences in what our respondents said about the Autonomous Administration are, at least in part, related to what they thought of the interviewers. The interviews with NGO workers from the Kurdish regions were conducted by the author personally, who all respondents know to be a critic of the Autonomous Administration. In this regard, they could feel free to criticise the Autonomous Administration without fear of repercussions. The interviews with Arab NGO workers, on the other hand, were conducted by a Kurd who made contact with the respondents through another Arab. This means that they were unaware of their political stance and could have assumed that, being Kurdish, they were close to the Autonomous Administration on which they depend. Their reluctance to criticise the Autonomous Administration may therefore be strategic primarily and not based on fact. On the other hand, as will be seen below, some of them did criticise the Autonomous Administration in connection with corruption.

One respondent from the Arab regions described the administrative rules set by international donors as particularly problematic:

»The biggest challenge faced by the associations is the unreasonable conditions set by the donors. Especially the European ones. They want bank accounts to finance projects. This is unreasonable for us, because here in the Autonomous Administration regions in north-eastern Syria, or even in Syria itself, there are no banks where we can open an account. The only bank in Syria is the Damascus Bank or the Syrian Central Bank. Nobody can open an account here, firstly because of international sanctions and secondly because most activists are wanted by the regime for taking part in the revolution.« (NA1)

»Money cannot be transferred or transported from Turkish banks to northeast Syria because Turkey forbids it. So the Iraqi-Kurdistan region is our only option. But since the beginning of the year, the Iraqi Central Bank has decided to only pay out money in Iraqi dinars and not in US dollars. This has caused us major problems because the value of the money transferred has dropped by 25 per cent. If 100,000 US dollars are transferred, we only get 75,000. So the loss rate is very high. This is something we cannot change.« (NA1)

In reality, the problem described has existed for some time—as a result, some NGOs with offices in Europe deliberately bring funds across the border illegally and in cash. This creates a risk that the funds will be discovered and confiscated.

Corruption

The experts we interviewed from the traditionally Kurdish regions unanimously described corruption as present and serious. This contrasts with the quantitative study, which does not identify corruption as a problem in carrying out projects. However, this is unlikely to be because corruption was not explicitly offered as a response option, rather than because the NGOs interviewed had no experience of the phenomenon itself. The categories available were limited to 'lack of funding', 'recruitment of qualified staff', 'legal/administrative provisions/regulations', 'security', 'local infrastructure' and 'other'. However, the experts themselves were specifically asked about the issue of corruption.

One media professional we interviewed said:

»Money disappears and doesn't reach people in need. The donors are far away, cannot control it and simply accept what is going on.« (MK1)

One member of staff from a small NGO commented on corruption as follows:

»Corruption takes place. It's true.' The Administration and the people who run the NGOs are the main perpetrators of corruption. For example, it is very common to say that there are ten staff and that each will receive 1,500 US dollars as per the contract. However, it is agreed that they will only receive 500 US dollars. They sign to say they received 1,500 US dollars when in fact they only received 500 US dollars. One woman volunteer on one of our projects said she always signed to say she was being paid 1,200 US dollars, but she was actually only receiving 100 US dollars a month. She worked for a radio station. There is a lot of fraud when it comes to salaries as well as in the purchase of goods and services. An agreement

is made with the seller to write a much higher amount on the receipt than the actual cost.« (NK 1)

A member of staff from a second NGO confirmed the misappropriation of funds through salary inflation:

> »Corruption takes place. For example, you have a project from [a donor]. You tell them you are going to pay the staff 1,000 US dollars and you actually pay them 200 or 300 US dollars. It used to be much more prevalent. Receipts are forged. Very often, the NGO and the seller come to an agreement and they get receipts with prices much higher than the prices actually paid.« (NK2)

The misappropriation of funds through misrepresented salaries and inflated calculations for certain services or goods in the budgets submitted was also confirmed by the third NGO employee we interviewed. Like NK2, they also pointed out that inflating salaries was more of a phenomenon in the early days of NGOs. Meanwhile, salaries have fallen or the cost of living is so high that making this type of savings is difficult. (NK3)

NK3 cited the difficulty, especially for local NGOs, of bridging periods of time in which they have no projects and therefore no funding as the main reason for the practice of withholding funds by inflating costs. Building up reserves makes it possible for them to continue to operate and pay staff during these periods. This makes it less about personal enrichment and more about keeping the NGO going.

NK2 also addressed the issue raised here of organisations not being able to build up reserves and suggested that this could be addressed by allowing an administrative overhead:

> »At least 15% of the project cost has to be spent on administration. Many organisations can't do anything without project funding. And they don't do anything because they have no reserves.«

Construction and humanitarian aid have been identified as particularly corrupt sectors. In the latter, the sums involved are much higher than, for example, in youth work, making it more susceptible to corruption. (NK2)

The retention of funds by staff at international NGOs was also mentioned as another form of corruption:

> »There are Syrians working for international NGOs. They go to the NGOs and promise to organise projects for them and then demand 15% of the total budget for themselves.« (NK2)

When asked how corruption could be tackled, MK1 answered,

> »I have no idea how to fight corruption. If you want to fight corruption, you would have to put an immediate stop to all the funding programmes.«

On further questioning, they considered external audits to be generally useful. However, they were critical of the requirement for NGOs to publish their own finances, which was not a tradition in the region.

In our quantitative survey, 27 NGOs said they publish their finances, 28 said they do not, and 42 NGOs did not answer the question. Those that disclosed their finances sent annual reports to stakeholders and/or donors, their funders or local authorities. Others only shared financial reports internally within their board.

The most common reasons given for not disclosing finances were security concerns, instability and the lack of a legitimate authority in the region. Some organisations stated that financial disclosure was an internal matter for the organisation, while others refused to disclose because of data protection policies or specific donor guidelines.

It is interesting to note the attitude of the Autonomous Administration towards corruption. VK1 did not question that there was corruption, but immediately put it into perspective by pointing out that there was corruption everywhere and that people were suffering:

> »Corruption exists all around the world, and in all governments. Can you say that there is no corruption in Germany? Almost all the organisations here have corruption. For example, someone is in Europe and they get money for a project. They say I have a project for about 50,000 US dollars and they give it to a local partner. The local partner gets, say, 7%. Secondly, there is corruption when it comes to salaries. Frequently a relative gets the job, and frequently they are paid less than what is in the contract. The contract says, for example, 1,000 US dollars, but the relative only gets 300. People do this because they desperately need the money. Fake receipts. There is corruption everywhere. Both large and small.« (VK1)

The Administration itself does not take any action against corruption. The reason given for this is that they do not have any information on how much money each NGO actually receives:

> »We have no proof. We would immediately hold them to account and revoke their registration if we could prove it. They receive donations from foundations or foreign ministries. They tell us, for example, they have received 50,000 US dollars. We have no way of verifying that. So we don't check it. And I think that's a mistake. We have a form and they have to give us a description of their project and also how much money they have at their disposal for it. Who the donor is, whether they have local partners and their contact details. As I said, we have no way of checking whether the information about the money is correct. It's not like in Europe. Organisations get the money in Europe. Here it is the people who get the money. The money comes in cash, either through Kurdistan or through money transfer offices.« (VK1)

First, without a functioning banking system, it is difficult to control funds effectively. It is especially difficult to trace illegal cash movements across borders. Second, the Administration needs detailed information from agencies organising money transfers about who sends what to whom. To say the least, the fact that the Administration, which otherwise keeps a close eye on all NGO activities, shows no interest in tracing the income received by them is conspicuous. The willingness to carry out effective controls is probably minimal here because it is not the Administration's money at stake, but international funds. The Administration also has no interest in seeing NGOs shut down because of misappropriation, since it benefits from their work. Firstly, because it levies taxes on NGO workers' salaries—according to VK1, a five per cent citizens' tax. And secondly, because the NGOs are providing services to the region that the Administration would otherwise have to provide and spend its own money on.

One example of how the Administration benefits from the presence of NGOs is the establishment of an employment agency by the Civil Council in Ar-Raqqa. All NGOs are required to recruit thirty per cent of their staff from a pool maintained by the Civil Council. The Civic Council provides NGOs with CVs of people who may be suitable for the positions they advertise. They are sent more CVs if they do not find a suitable candidate. Ultimately, they are re-

quired to fill thirty percent of their positions with people from the Civil Council's pool. The advantage for the Civil Council is that it has a public service claim vis-a-vis the population. (NK3)

Our respondents from the Arab majority regions did not deny the existence of corruption. The head of an organisational office confirmed that there had been irregularities in the distribution of aid to needy families. He stated that aid organisations had,

> »faced problems with the selection of locations and beneficiaries, and this is because the region is a tribal area. I cannot deny that some individuals from local and international organisations have used their positions for personal or family gain. I'll tell you a story in relation: Last week we had a complaint in the complaints box. Someone complained about the process for distributing aid, vouchers worth a hundred euro in cash. They said that the poor families were not getting any help, but everything was being distributed to people who did not need it: doctors and shopkeepers. This is unacceptable [...] What we saw was that the organisation's choice of districts for the distribution of aid was actually wrong. [...] We've replaced the organisation responsible for this with another international organisation.« (VA1)

He also alleged that staff in the Organisational Affairs Office had unfairly included people on the list of needy people on the basis of personal and family relationships.

NA3 gave a number of examples of the ways in which corruption manifests itself:

> »For example, there is corruption in the recruitment of staff and bribery. Or some of the aid or food is sold. There are organisations that offer work in exchange for money. This means that you pay to get a job. Relatives or friends are officially hired, but they don't actually work. Instead, an official from the Autonomous Administration takes home three salaries at the same time. [...] If you don't toe the line, you have problems with the Organisational Affairs Office or the official himself, or your application isn't processed.« (NA3)

> »If members of the community are on the board of an organisation or an association, they don't have any problems. That's why corruption is so prevalent. A lot of things are done for personal gain. In a society like ours, which is a tribal society, everyone knows everyone else. This means that everyone wants their family or relatives to benefit. We don't have a culture where institutions are there for the people. People want to benefit personally from the institutions. So somebody's an Autonomous Administration official and they're on the board of a local organisation and they get support and funding. An Autonomous Administration official isn't actually allowed to work for an organisation. But many organisations have Autonomous Administration officials on their boards and get money for it.« (NA1)

> »Another example: [...] is the leader of the [...] tribe who also works for the Office of Organisational Affairs of the Autonomous Administration. [He] threatened to close down an organisation because it refused to employ his mistress. In the end, the organisation had no other choice but to hire her. Since the Autonomous Administration is based on tribal leaders and tribal structures, it's clear that there will be abuse of power and nepotism.« (NA1)

Corruption is not only a problem for individual NGOs, but also, and above all, for Autonomous Administration employees, which includes the civil councils.

When asked if the cases he mentioned were isolated incidents, NA1 explained:

»No! In the [...] camp, the staff from the [...] organisation forced a thousand dis-
placed people to accept poor quality and old stoves. A few days after the stoves
were installed, more than ten of them exploded and people were injured. Tents
burned down. Later, there were claims that the diesel fuel wasn't clean and this
was the reason for the fire. The people in the camp have no other choice. It's the
only organisation in the camp. It's unbelievable what the organisation did after-
wards. They forced the people to attend a seminar on fire prevention. [...] I want
to tell you something else: The easiest way to misappropriate money is to work in
reconstruction, construction and relief.« (NA1)

Comparing the statements of NGO workers in the Kurdish and Arab regions, a key difference
emerges. In the Kurdish regions, the Autonomous Administration is perceived primarily as a
control body trying to implement its political agenda. In the Arab regions, on the other hand,
criticism tends to be directed at the officials of the Autonomous Administration, who are ac-
cused of systematically enriching themselves. Furthermore, the prevalence of tribal structures
in the Arab regions is repeatedly cited as a factor contributing to the spread of corruption. The
Administration is criticised for consolidating these structures, from which it benefits, rather
than dismantling them.

Safety and infrastructure

Finally, infrastructure and security were issues raised by NGOs in our survey. Both areas played
a lesser role in the narratives of our Kurdish respondents. This may be due to the fact that their
NGOs are based in the Jazira region, where both infrastructure and security are better than in
Ar-Raqqa or Deir ez-Zor. Only NK2, which is active in Kobanî, mentioned 'security' and 'Turkish
threats' as problems.

A respondent from the Arab regions elaborated on the security situation:

»The biggest challenge is the unstable security situation in our regions. There's
also the fear of ISIS sleeper cells. You saw what happened last summer, I mean, the
fighting between the Syrian Democratic Forces and the armed tribal groups and
the Syrian regime's sleeper cells.« (NA3)

Summary and conclusions

Working conditions for NGOs in the Kurdish-majority regions of north-eastern Syria are severe-
ly restricted, in particular by control and censorship measures imposed by the Autonomous
Administration. Projects can only be implemented if critical issues are avoided, particularly
those relating to the Administration itself, its links with the PYD or the ideology of the PKK
and Abdullah Öcalan. There is no free press that can independently address socially relevant
issues. This lack of freedom is clearly acknowledged in the expert interviews; at the same time,
the larger and more successful NGOs/media organisations seem to have accepted the status
quo and the restrictions.

Against this background, there are unsurprisingly no registered organisations or major
media outlets in the self-governing region that investigate quasi-state human rights abuses.
Only four NGOs in our survey claimed to focus specifically on 'human rights' or 'advocacy and

human rights'—although it's important to note that this category was not pre-defined in our questionnaire. Some individual NGOs in the region publish reports on human rights abuses in the Turkish-held Afrin region, but not on incidents in the regions of Jazira or Kobanî, Ar-Raqqa or Deir ez-Zor. For example, a spot check carried out between 24 July and 23 August 2023 by a local NGO with good ties to the Administration found a total of 11 posts on human rights abuses in ʿAfrin during this period, but not a single post on human rights abuses by the PYD—or reports on incidents in Deir ez-Zor, where clashes had occurred between Arab and Kurdish units within the Syrian Democratic Forces (SDF).[4] Ignoring certain events is the price of operating in the PYD-administered Kurdish region.

Critical reporting on these regions and the PYD's human rights abuses is also lacking from unregistered associations and human rights organisations. This is not surprising, as the risk of sanctions for critical reporting on the Autonomous Administration is high, possibly even higher than for registered organisations. A gap can be identified here that could be of interest to donors: The funding of one or more projects to investigate and publicise human rights abuses by authorities and officials in the Autonomous Administration region, using local staff but without local registration or premises.

In general, donors should be wary of supporting only humanitarian projects. Priority should also be given to democratisation and human rights projects, especially in times of increasing normalisation, when political transition seems more distant and financial resources diminish.

In contrast, criticism of the political restrictions imposed by the Autonomous Administration did not feature prominently in the interviews we conducted with NGO workers in the Arab Autonomous Administration regions. The main issue was the gradually diminishing resources available to the region and to individual organisations. Corruption within NGOs and among Autonomous Administration staff was also identified as a key problem by some respondents. Our Arab and Kurdish respondents' experiences of corruption were similar. It remains unclear to what extent the Arab respondents who did not mention these links did so because they did not know the Kurdish interviewer personally and were afraid that he might be close to the Autonomous Administration.

Donors certainly need to consider how to specifically tackle corruption. Here, external audits that examine both the financial and substantive work of the projects seem to make sense to us. However, there is the problem of advising and controlling the organisation at the same time if the donor carries out these audits itself. Donors also have an interest in their projects being perceived as successful, otherwise they risk losing their own funding. Stricter accounting rules mean more work for NGOs—but they can also be associated with a push for increased professionalism. For example, MK1 stated,

> »[...] is strict, they're no fun to work with. But we are becoming more professional.«

In our view, donors should insist that NGOs publish their finances. This is not about details, but about knowing what monies has been received and what they have been spent on. Internal financial disclosure is not enough, especially since decision-makers in many organisations are limited to two or three people, often family members. NGOs also have a bad reputation in the Syrian community because of this lack of transparency.

Indeed, it should become standard practice for both staff and service contracts and re-

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4 K24, 26/07/2023, 'Tensions erupt in Deir ez-Zor between SDF and military council', available at https://www.kurdistan24.net/en/story/32051-Tensions-erupt-in-Deir-ez-Zor-between-SDF-and-military-council.

ceipts for the purchase of goods and services to include contact details, such as telephone numbers and email addresses, so that external auditors can verify costs.

We also believe that there is a need to change the way projects are funded. Projects should be funded for longer periods rather than for shorter ones, as suggested by one respondent (NK3), as this would allow them to become established. It would also make sense to fund an 'extra month' after project activities end to wind up the project. In addition, an administrative allowance of at least ten percent should allow NGOs to finance unexpected additional expenses. Combined with professional audits, longer project durations and generous administrative costs could significantly reduce the motivation to misappropriate funds.

Consideration could also be given to awarding small projects (e.g. up to a maximum of 5,000 euro) to local NGOs and evaluating them solely on the basis of the achievement of pre-negotiated objectives, rather than a financial audit. In this way, bureaucratisation could be countered without compromising on content. This would be particularly beneficial for small, newly established NGOs, provided that the achievement of the objectives could be verified safely and without any problems.

Finally, in order not to compete with local NGOs for the best staff, international NGOs should refrain from paying their local staff more than local NGOs can afford.

Non-governmental organisations in the regions under the control of the »Autonomous Administration of Northern and Eastern Syria«

Work priorities, challenges, shortcomings

Extended Version

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