



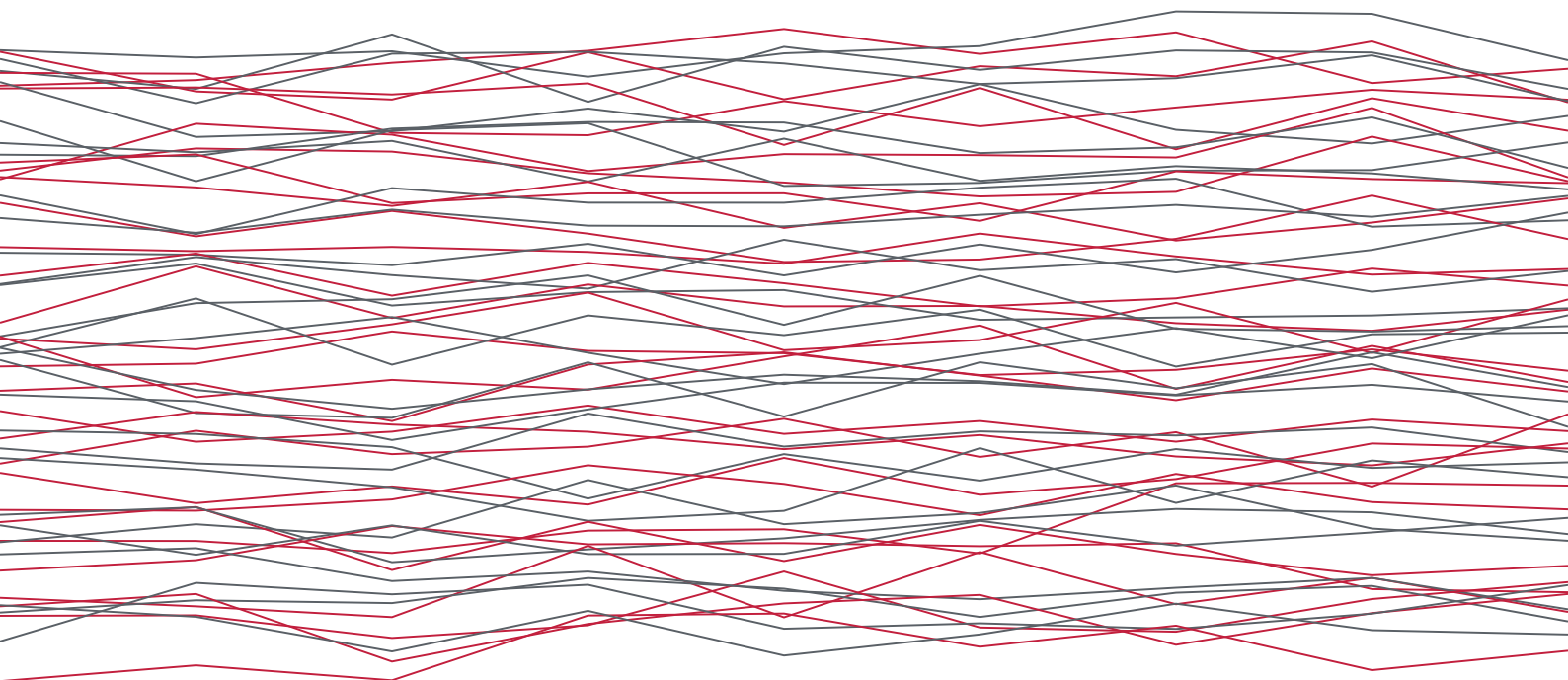
Post-Earthquake Perspective

Challenges and Strategies for Humanitarian Aid in
Northwest Syria

*System Failure: How the Earthquakes Exposed the
Limits of the International System in Northwest Syria*

Ad Hoc Series Part 1

June 15, 2023



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GLOSSARY

AFAD	DISASTER AND EMERGENCY MANAGEMENT AUTHORITY	OCHA	(UN) OFFICE FOR THE COORDINATION OF HUMANITARIAN AFFAIRS
DRHC	DEPUTY REGIONAL HUMANITARIAN COORDINATOR	OES	OPERATION EUPHRATES SHIELD
EU	EUROPEAN UNION	RNA	RAPID NEEDS ASSESSMENT
FSA	FREE SYRIAN ARMY	SANES	SELF-ADMINISTRATION OF NORTH AND EAST SYRIA
GOS	GOVERNMENT OF SYRIA	SCHF	SYRIA CROSS-BORDER HUMANITARIAN FUND
HC	HUMANITARIAN COORDINATOR	SIG	SYRIAN INTERIM GOVERNMENT
HNAP	HUMANITARIAN NEEDS ASSESSMENT PROGRAMME	SNA	SYRIAN NATIONAL ARMY
HNS	HUMANITARIAN NOTIFICATION SYSTEM	SNGO	SYRIAN NON-GOVERNMENTAL ORGANIZATION
HRP	HUMANITARIAN RESPONSE PLAN	SSG	SYRIAN SALVATION GOVERNMENT
HTS	HAYAT TAHRIR AL-SHAM	UN	UNITED NATIONS
IDP	INTERNALLY DISPLACED PERSON	UNDAC	UN DISASTER ASSESSMENT AND COORDINATION
IM	INFORMATION MANAGEMENT	UNFPA	UNITED NATIONS POPULATION FUND
INGO	INTERNATIONAL NON-GOVERNMENTAL ORGANIZATION	UNMM	UNITED NATIONS MONITORING MECHANISM
INSARAG	INTERNATIONAL SEARCH AND RESCUE ADVISORY GROUP	UNSC	UNITED NATIONS SECURITY COUNCIL
JAN	JABHAT AL-NUSRA	UNXBM	UNITED NATIONS CROSS-BORDER MECHANISM
KII	KEY INFORMANT INTERVIEW	USAR	URBAN SEARCH AND RESCUE
MSF	MÉDECINS SANS FRONTIÈRES	USD	UNITED STATES DOLLAR
NES	NORTHEAST SYRIA		
NFI	NON-FOOD ITEM		
NGO	NON-GOVERNMENTAL ORGANIZATION		
NSAG	NON-STATE ARMED GROUP		
NWS	NORTHWEST SYRIA		

EXECUTIVE SUMMARY

The humanitarian aid landscape in Syria, particularly in Northwest Syria (NWS), has been plagued by significant structural problems that have become more apparent in the wake of the recent earthquakes. Despite the severe devastation caused by the disasters, emergency response to the region was fatally slow or absent, leaving millions without access to critical search-and-rescue reinforcements and life-saving assistance. This created a prevailing sense of abandonment among communities throughout the affected areas, and drew sharp criticism directed at humanitarian responders, particularly the United Nations (UN).

The Ad Hoc series aims, therefore, to provide a diagnostic analysis of the challenges and obstacles that hindered the timely delivery of relief efforts following the earthquakes. By identifying these pitfalls, the analysis intends to bring attention to the underlying shortcomings and limitations present within the existing aid system, which has been in place for the past twelve years. The recent disasters have highlighted the immense challenges that confront humanitarian efforts in non-state governed regions that are restricted to a dependence on UN aid modalities, and the urgent need to re-evaluate actors' strategy in addressing worsening humanitarian needs.

This report, the first part of a two-part series, focuses on highlighting the structural issues in the current aid landscape illustrated by the deficiencies in the earthquake response. Its purpose is to provide a comprehensive resource for better understanding aid operations and to facilitate informed and actionable conversations among humanitarian actors, donors, government agencies, and other stakeholders involved in Syria. It aims to enable actors to find more resilient and effective response mechanisms by leveraging understandings of existing limitations, humanitarian needs, and lessons learned from previous experiences.

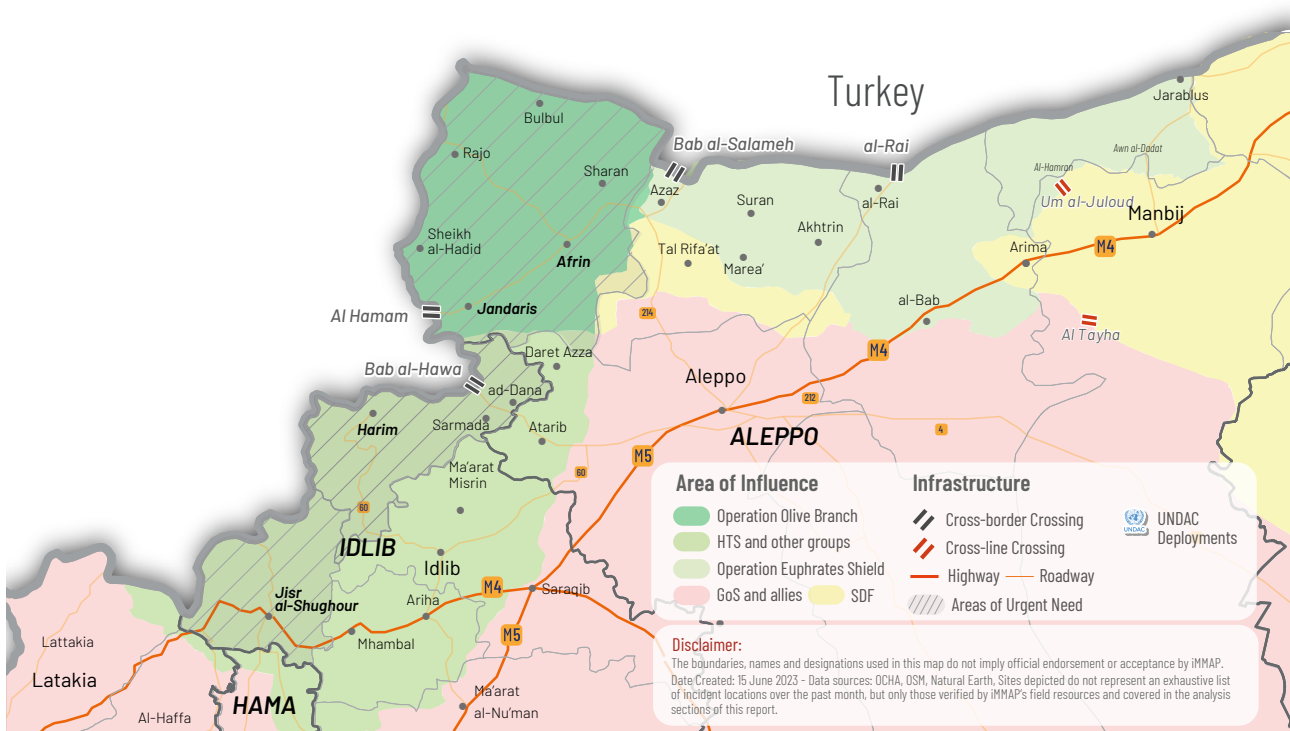
The second part of this series provides an essential examination of how system failures during the earthquakes are symptomatic of politicized, structural issues in the aid landscape. It highlights the necessary developments in the NWS humanitarian landscape to reprioritize humanitarian principles in the approach of international actors, and the common constraints this will face.

KEY FINDINGS: PART 1

- Although the UN Office for the Coordination of Humanitarian Affairs (OCHA) made requests to member states on behalf of NWS for Urban Search and Rescue (USAR) teams to be deployed, seemingly none were sent. The absence was reportedly due to the legal concerns of states over sovereignty as the request did not originate from the Government of Syria (GoS) and fell outside of UN Disaster Assessment and Coordination (UNDAC) common protocol. This has illustrated the limitations of an emergency system that is not designed for areas of non-state governance that often characterize intrastate conflict.
- Key hubs for humanitarian operations in NWS in Gaziantep and Antakya were severely affected by the earthquakes, received limited surge support, and initially had a lack of senior leadership, leading to significant issues with coordination efforts in the immediate days following the earthquake. Loss of communications channels with NWS and a rush to produce an impracticable number of rapid needs assessments inhibited an informed and coordinated response strategy, illustrating the limitations of remote humanitarian access across politicized borders.

EXECUTIVE SUMMARY

- Amid debates around the politicization of cross-border access during the earthquakes, the UN cross-border mechanism (UNXBM) and its corresponding notification systems brought additional logistical challenges for UN agencies efforts to send emergency relief to NWS via Bab al-Hawa. A lack of clarity around the use of Emergency Notification Submissions and changes to the notification request procedure, including the time period of advance notice required for shipments, contributed to a level of confusion and operational strain among partners. This poses questions regarding the suitability of the UNXBM to respond flexibly to such urgent humanitarian disasters and the need for more resilient modalities in parallel.
- Although necessary to expand all avenues of international aid to NWS, the approval by GoS of a further two border crossings may have come at the cost of a longer duration of access and has struggled to scale-up operations due to a lack of Syrian non-governmental organization (SNGO) capacity to adapt supply chains, which continued to operationalize commercial crossings. However, consolidating the use of this modality is currently restricted by the lack of available data on its usage by the humanitarian sector, with the UNXBM therefore remaining essential.
- SNGOs and local actors were under a disproportionate amount of pressure as they grappled with a severely impeded cash transfer system, lack of pre-positioned supplies, the monopolization of key goods, and price surges. Despite staff being impacted themselves, SNGOs exhibited high resilience to continue operations through commercial crossings and conduct needs assessments. However, the earthquake also highlighted the difficulties of providing adequate duty of care for SNGOs in NWS during emergencies due to the restricted financial system.



INTRODUCTION

After over a decade of war underscored by severe poverty, recurrent displacement, a pandemic, and widespread traumatization, on February 6 the inhabitants of NWS were subjected to the most severe seismic activity seen in the region since 1939. A series of powerful earthquakes struck southeast Turkey and NWS, causing the deaths of over 5,000 Syrians as whole towns were levelled.¹ Humanitarian needs in NWS were already at the highest level since 2011, with over 90 percent of the region's 4.5 million inhabitants heavily relying on life-saving assistance.² The long-term impact of the earthquakes' extensive destruction on already fragile infrastructure and shelter as a result of the conflict has profoundly amplified these needs. Although observers of the crisis may indeed often perceive the resiliency of individuals and families in NWS, and in the rest of Syria, to be immeasurable, there should be no assumption that Syrians can or should absorb further hardship.

As humanitarian priorities shift and donors persist in cutting funding for the Syrian crisis, aid programming risks falling significantly short in adequately securing basic rights to safety, healthcare, clean water, and sufficient food for those in NWS. However, other recent conflict contexts, such as Iraq, have shown that even with sustained levels of funding, a lack of properly structured humanitarian architecture risks preventing a strategic and integrated approach to aid provision, and therefore a sustainable improvement in the living conditions of individuals. iMMA's *Post-Earthquake Perspective: Challenges and Strategies for Humanitarian Aid in Northwest Syria* two-part Ad Hoc series looks to identify how the current NWS humanitarian landscape can be improved to achieve this end.

Part 1 of this series is diagnostic. It lays out how the earthquakes and subsequent international response have specifically illustrated a number of weaknesses within the current NWS aid landscape, particularly in its capacity to deal with disasters within an area of remote humanitarian access and non-state governance. *Part 2* will then provide an essential examination of how system failures during the earthquakes are symptomatic of politicized, structural issues in the aid landscape as NWS humanitarian operations enter their twelfth year, with needs only worsening. *Part 2* is consultative, in that it will propose the developments necessary in the NWS humanitarian landscape to drive a reprioritization of humanitarian principles in the approach of international actors, and the common constraints they face.

This report, *Part 1: System Failure: How the earthquakes exposed the limits of the international system in NWS*, examines in detail some of the widespread accusations of the insufficient international humanitarian response to the earthquakes in NWS, identifying the most pertinent and credible weaknesses within the cross-border system operational in the region. Following a contextual overview of current humanitarian access to NWS and the region's key actors, **Section I** of this report will first address the initial search and rescue phase after the earthquakes. This should be diagnosed separately to the subsequent emergency aid response due to the more significant role of member states, despite failures in both being symptomatic of the access restrictions for humanitarian operations in NWS. *Section I* finds that the absence of designated USAR assistance in NWS can be attributed to member state refusal to supply teams to NWS outside of the UNDAC and International Search and Rescue Advisory Group (INSARAG) structure. Despite requests by OCHA global senior leadership, countries were reportedly hesitant to send national teams into NWS over political concerns of illegal violations of Syrian sovereignty.

1 Al Jazeera, "[Turkey-Syria updates: Death toll surpasses 46,000](#)," February 18, 2023.

2 Brookings, "[Northwestern Syria needs humanitarian assistance. Getting it there must be a priority](#)," February 8, 2023.

Section II of this report examines the coordination and surge support limitations experienced in the humanitarian response as a consequence of remote operations from the OCHA hubs in Gaziantep and Antakya in Turkey that were themselves severely impacted by the earthquakes. Findings show that coordination difficulties, exacerbated by a key vulnerability in the loss of communications channels, resulted in an impracticable number of rapid needs assessments (RNAs), with the lack of cohesive data undermining the formation of an informed and strategic response. Findings show that the lack of additional surge support allocated to OCHA Gaziantep was a contributing factor to these coordination limitations. The UN relied instead on the regional office with reduced leadership at the time to take on a vast disaster response, in addition to the routine pressures of conducting humanitarian operations in areas of restricted non-state authority, all while personally disrupted by the earthquakes.

Section III details logistical procedures behind the UN cross-border mechanism (UNXBM) transshipment process to examine widespread accusations of a lack of action by the UN in delivering life-saving assistance through Bab al-Hawa in the immediate days following the earthquakes. Disruption within the Humanitarian Notification System (HNS) and corresponding impact on the United Nations Monitoring Mechanism (UNMM) impacted the efficiency with which shipments could make it through Bab al-Hawa, demonstrating the limits of a reliance on the UNXBM for an effective emergency aid response. Moreover, the strategic approval by the GoS of the Bab al-Salameh and al-Rai crossings prior to an anticipated United Nations Security Council (UNSC) resolution demonstrated a prioritization by the international community of GoS sovereignty over humanitarian need. SNGOs played a vital role in filling this gap through the rapid operationalization of commercial crossings, adding to discussions around the need for complementary and resilient alternative cross-border operations to support the UNXBM's essential role in humanitarian relief.

Section IV addresses how SNGOs and their staff were left isolated due to limited cross-border access as they rushed to lead the humanitarian response after the earthquakes, while they dealt with their own, often devastating, personal circumstances and displacement. SNGO staff had to manage resources among an increasingly expensive and depleted supply of essential goods, in addition to the informal money transfer *hawala* system in NWS becoming non-functional after the earthquakes due to the lack of supply of cash. These factors combined to obstruct the ability of NGOs to implement duty of care for their staff, prompting wider conversations regarding how SNGOs can be better supported in their delivery of life-saving assistance to their own communities within a restrictive financial system.

Part I in this series therefore aims to show how the earthquakes have demonstrated tangible deficiencies in the current humanitarian landscape in NWS. *Part II* will explore how these are not isolated failures within the earthquake response but rather prompt a necessary reconsideration of the broader structural components of the humanitarian landscape in NWS. This begins with a recognition that the twelve-year-old emergency response system must evolve in order to address the stark humanitarian need. To do so, *Part II* will examine the tensions between humanitarian principles and the impact an inflated emphasis on sovereignty has had on the NWS aid landscape. It highlights the need for a longer-term, integrated humanitarian strategy beyond isolated projects as the response moves away from emergency relief towards an 'early recovery' phase. *Part II* will then evaluate the elements of the humanitarian landscape that will need to be developed to facilitate this, and their respective constraints. These include a complementary, de-politicized modality to increase cross-border resilience and greater support from the donor community to protect the capacity of SNGOs by helping them navigate sanctions regimes.

Until a new approach is adopted, humanitarian need in NWS will remain contingent on the current modalities. Although the earthquakes have highlighted failures within this system, they do not invalidate the essentiality of components such as the UNXBM. This series aims to support humanitarian organizations with their advocacy efforts by providing a detailed examination of specific limitations and how they came to be to combat politicized debates around their impact. It also hopes to illustrate the enduring resilience of the Syrian humanitarian sector over the last decade, as well as opportunities to support their efforts within a more conducive operational environment.

METHODOLOGY AND LIMITATIONS

DATA COLLECTION

For this series, iMMAP leveraged a combination of extensive desk reviews, field research and key informant interviews (KIIs), personal networks, and iMMAP Research and Analysis Unit's previous [contextual analysis](#) and [spot report](#) published in the aftermath of the earthquakes. In addition, the research team conducted key actor analysis and timeline/process mapping activities to identify the roles and responsibilities of different humanitarian actors in NWS, as well as to map out the chronological sequence of events relevant to this report. Valuable insights were also derived from rapid research and thematic reports released after the earthquakes, such as the humanitarian bulletins produced by OCHA and other UN agencies, along with programming updates shared by NGOs.

Between March and June 2023, iMMAP conducted semi-structured KIIs with various representatives of the humanitarian response, including Gaziantep-based coordination representatives, Syria-focused analysts, and Syrian/International Non-Governmental Organization (S/INGO) staff. KIIs were based upon topic guides that were selected from a master list of questions according to respective representatives' areas of expertise. This design was intended to promote flexibility and open sharing of experiences, with the aim of capturing nuanced and under-documented perspectives. iMMAP obtained informed verbal consent from KIIs, including for taking audio recordings and transcripts of the interviews. Confidentiality and anonymity were confirmed for all participants prior to the interviews, with a commitment to securely storing all recordings and notes, accessible solely by iMMAP's Research and Analysis Unit.

In its capacity as an information management (IM) agency, iMMAP participated in various coordination meetings held by OCHA Gaziantep and the NGO Forum during the emergency response period. This firsthand experience offered important insights into the capacity of existing mechanisms, including the challenges associated with data collection in the immediate aftermath of the earthquakes. Indeed, the tangible impact of specific and urgent issues around communications and coordination of NGO efforts during this period provided some of the impetus for this report. Since a key objective of this study is to support and shed light on the efforts of humanitarian actors, particularly local organizations, from SNGO and coordination representatives actively offered valuable insights to inform the findings of this report.

DATA ANALYSIS

This report presents a comprehensive diagnostic analysis of the pitfalls that characterized the humanitarian response to the earthquakes in NWS, identifying the key obstacles and shortcomings that hindered immediate relief efforts. By way of demonstrating these challenges, the report seeks to elucidate the broader flaws and limitations inherent in the now twelve-year-old aid architecture. The primary objective of this analysis is therefore to encourage informed and actionable conversations among humanitarian actors, donors, policymakers, and other stakeholders involved in Syria. It should serve as a starting point to finding adequate solutions for a more resilient and acceptable response mechanisms rooted in a strong understanding of existing limitations, needs, and lessons learned from past experiences.

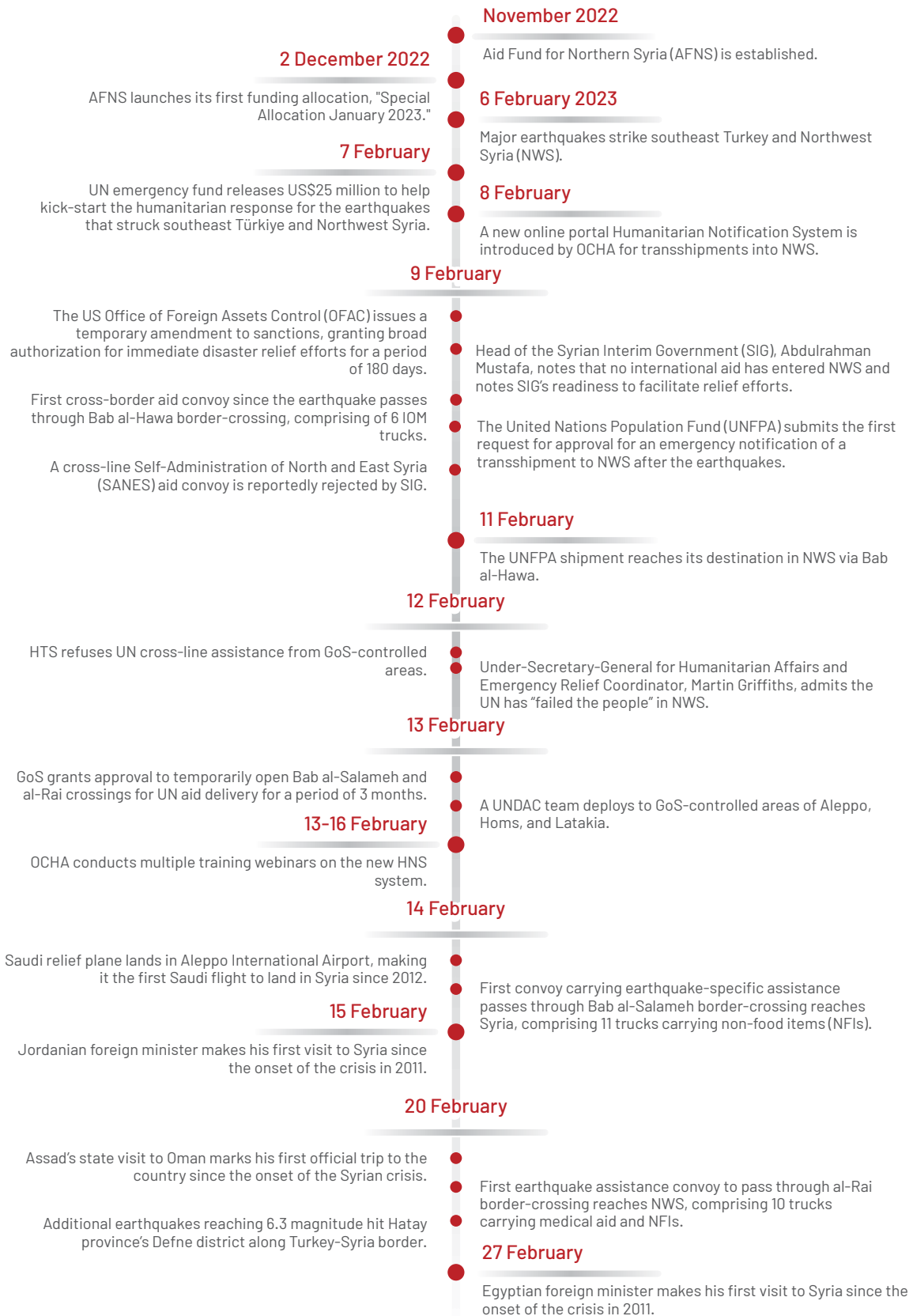
LIMITATIONS

The analysis of this report is constrained by the dynamic and evolving nature of the post-earthquake context in NWS. Given that less than six-months have passed since the earthquakes struck the region, variables are subject to substantial changes that might impact humanitarian operations and actors. Many stakeholders are still determining their humanitarian approach among rapidly evolving geopolitical developments.

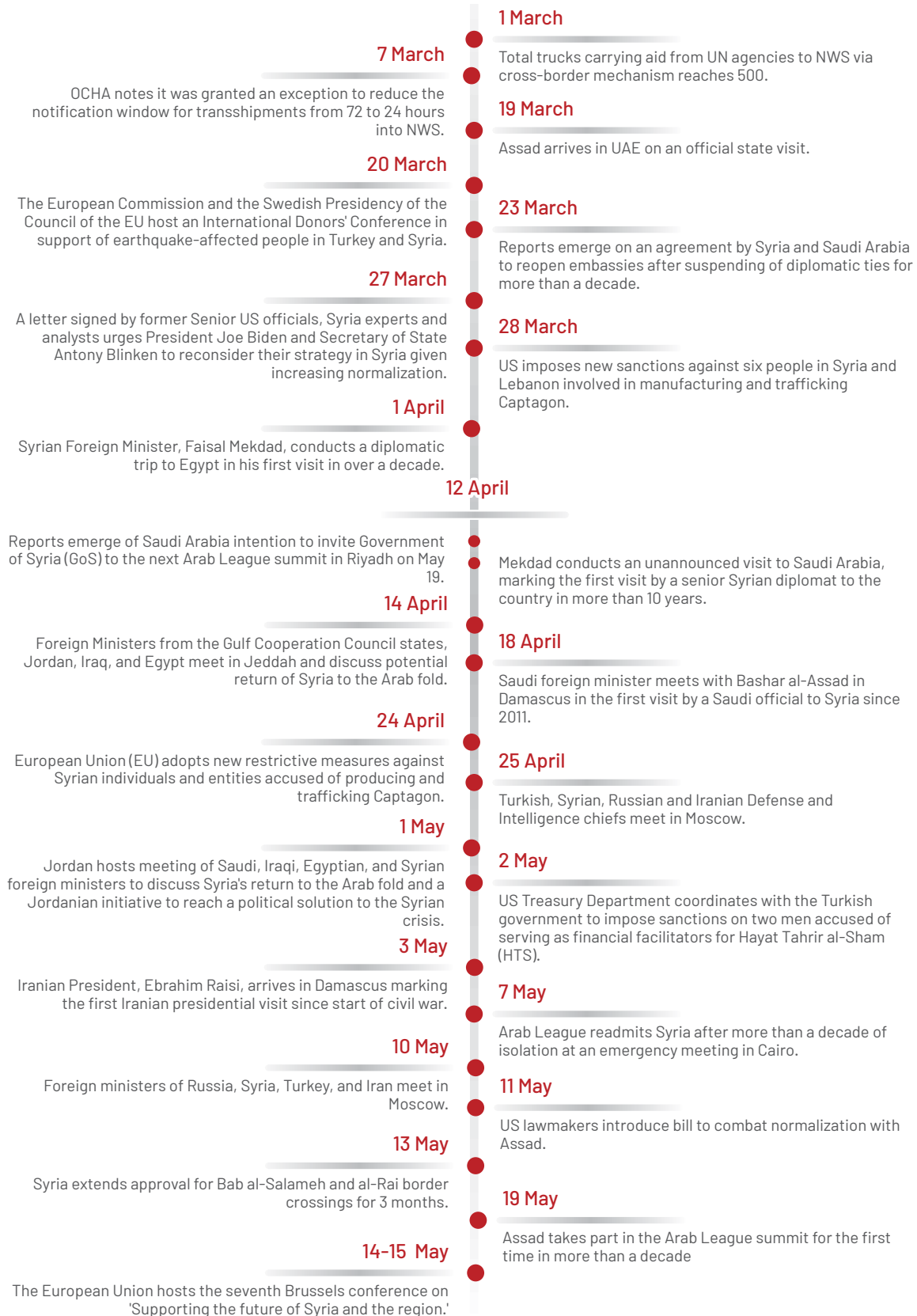
This limitation somewhat motivated the structuring of this two-part Ad Hoc series. There are a set of events which occurred during the earthquakes that can be analyzed to show discrete weaknesses in an emergency response that had not been tested before in such a restrictive humanitarian environment. Such considerations are worth assessment in and of themselves for the international community to learn the constraints of the current system. Separating the reports, therefore, allows sufficient examination of the earthquake response, as well as the wider debates surrounding the future of humanitarian strategy in NWS that have been amplified since.

iMMAP is aware that an after-action review conducted by UN agencies and operational partners is currently underway, aiming to examine the details of the earthquake response. However, due to the absence of the results of this review, details provided in this report look to provide a representative account of open-source information, as well as the first-hand experiences and impressions of KII participants in this research.

TIMELINE



TIMELINE



HUMANITARIAN LANDSCAPE AND NEEDS OVERVIEW

Prior to the devastating earthquakes, NWS was already facing dire humanitarian conditions driven by the impacts of over a decade of conflict, economic deterioration, persistent droughts, and multiple displacements. Humanitarian needs had reached unprecedented levels, with over 90 percent of the region's 4.5 million inhabitants heavily relying on life-saving assistance.³ The number of internally displaced persons (IDPs) in NWS surpassed 2.8 million, many of whom reside in overcrowded sites with limited access to basic services.⁴ Approximately 1.7 million IDPs⁵ continue to live in 1,420 camps or informal sites, most of which are self-settled and lack camp management and essential services.⁶

The NWS Shelter Cluster reported that over 1,900 structures were destroyed in the earthquakes, with more than 8,800 buildings damaged.⁷ As the humanitarian response in NWS rapidly evolved from emergency search-and-rescue to urgent relief provision, focus was drawn to the overwhelming priority needs of IDPs and overstretched host communities in the region.⁸ The severity of humanitarian needs intensified across various sectors, impacting over 100,000 who were forced to flee their homes and leading to particularly acute strains on healthcare facilities.⁹ OCHA has estimated that more than 50,000 families¹⁰ were left without access to services, as a result of the destruction of over 55 hospitals and primary healthcare facilities across NWS.¹¹ Specifically, demand for mental health services surged as aid workers faced the overwhelming task of addressing widespread traumatization, while simultaneously dealing with the growing threat of a cholera resurgence.

Over the last few years, the capacity of humanitarian agencies to respond to the growing humanitarian needs in NWS has been hampered by dwindling funding. Despite the Flash Appeal for Syria in response to the earthquake being more than 99 percent funded at the time of writing,¹² the Humanitarian Response Plan (HRP) for 2023 still faces a significant shortfall of 91 percent.¹³ The strain on donor funding is widespread, with resources being stretched across the globe. Some donors have reportedly urged NGOs to divert already earmarked funds to support earthquake response efforts.¹⁴ Without new funding prospects, repurposing existing resources depletes ongoing programs and services. Beyond funding considerations, the persistent uncertainty and contention surrounding the renewal of the cross-border resolution and the short-term six-month renewals pose significant challenges for NGOs programming in NWS. Without long-term projections, NGOs face difficulties in securing funding, planning resources, staffing, and establishing effective monitoring mechanisms for program evaluation.

3 Ibid.

4 Ibid.

5 Ibid.

6 Shelter Cluster, "[2022-09 FACTSHEET - X-BORDER OPERATION - TURKEY HUB](#)," September 14, 2023.

7 Global Shelter Cluster, "[GSC SYRIA EARTHQUAKE RESPONSE UPDATE 8 MARCH 23](#)," March 8, 2023.

8 OCHA, "[North-West Syria: Situation Report \(25 February 2023\)\[EN/AR\]](#)," February 25, 2023.

9 OCHA, "[North-West Syria: Situation Report \(15 March 2023\)\[EN/AR\]](#)," March 15, 2023.

10 OCHA, "[North-West Syria: Situation Report \(28 April 2023\)\[EN/AR\]](#)," April 28, 2023.

11 DEEP, "[ACU_EARTHQUAKE-NW-SYRIA_SITREP](#)," February 23, 2023.

12 Financial Tracking Service - UNOCHA, "[Syria Earthquake Flash Appeal 2023](#)."

13 Financial Tracking Service - UNOCHA, "[Syrian Arab Republic Humanitarian Response Plan 2023](#)."

14 The New Humanitarian, "[Earthquake funding gap exposes larger fault lines for emergency aid sector](#)," March 21, 2023.

HUMANITARIAN ACCESS

The UNXBM dominates the aid response for NWS and has played an essential role in addressing the scale of humanitarian need in the region. It consists of the indirect provision of aid items through, and the granting of financial and logistical assistance to, NGO third-party implementing partners.¹⁵ The UNXBM involves four key elements to deliver assistance into NWS, comprising coordination, access and negotiations, and logistics management, as well as the Syria Cross-Border Humanitarian Fund (SCHF).

The SCHF serves as the financial backbone for the UNXBM. Established in 2014, this fund is under the supervision of OCHA and relies on contributions from multiple donors.¹⁶ The SCHF funds projects and activities of UN agencies, as well as implementing SNGO and INGO partners providing assistance in NWS. OCHA also manages the UN Transshipment Hub in Hatay, Turkey, through which thousands of tons of goods-in-kind assistance are processed for delivery to beneficiary communities in NWS, with individual cross-border shipments requested by UN Agencies. OCHA is therefore also a vital intermediary in establishing access through managing negotiations between SNGO implementing partners and authorities in NWS.

The UNXBM was established in July 2014, when the UNSC unanimously adopted Resolution 2165.¹⁷ This resolution was intended to be an auxiliary support for the legal basis of the delivery of cross-border humanitarian aid into NWS through a UNSC mandate, which is otherwise legal under international humanitarian law. However, at the time, the fast-moving nature of the conflict in NWS complicated aid access as it precluded reliable negotiations with territorial authorities. Resolution 2165 initially provided a consensus-based guarantee of access and an ability to scale aid operations through four border crossings, Bab al-Salameh and Bab al-Hawa (Northwest Syria), al-Yarubiyah (Northeast Syria), and al-Ramtha (South Syria). Crucially, UNSC-mandated cross-border operations were able to be implemented without prior approval from Damascus, merely notifying the GoS to confirm the humanitarian nature of shipments. However, this established a protocol whereby UN agencies are only allowed to use UNSC-mandated crossings, whereas non-UN organizations are able to send shipments via commercial routes using private transport providers, or with the support of Turkish authorities. This underpins the essentiality of the UNXBM until humanitarian needs have been sufficiently addressed such that NWS inhabitants are no longer reliant on emergency relief items provided by the UN.

Sustaining these corridors for UN operations is subjected to periodic review by the UNSC, and its approval has been necessary to extend the resolution in subsequent years. Following persistent pressure and repeated vetoes by Russia and China, all crossings except for Bab al-Hawa were eventually closed by 2020.¹⁸ Bab al-Hawa has remained the single permitted entry point under the UNSC resolution for the vast operation of the UNXBM. In July 2022, Moscow further pushed to reduce the duration of the resolution protecting this access from one year to a mere six months.¹⁹ These decisions are frequently justified on the grounds that maintaining these crossings infringes upon Syria's territorial sovereignty. With the next vote on the extension of the resolution slated to take place in July 2023, and as regional and international calculus shifts in Bashar al-Assad's favor, actors fear the possibility of closing the last lifeline left in NWS.

¹⁵ Cross Border is legal, "[2014 IS NOT 2022: WHY THE CONTINUATION OF UN-COORDINATED CROSS-BORDER AID INTO SYRIA ABSENT A UN SECURITY COUNCIL RESOLUTION IS LAWFUL.](#)"

¹⁶ UNOCHA, "[Syria Cross-border Humanitarian Fund.](#)"

¹⁷ United Nations, "[With Millions of Syrians in Need, Security Council Adopts Resolution 2165 \(2014\) Directing Relief Delivery through More Border Crossings, across Conflict Lines.](#)" July 14, 2014.

¹⁸ MSF, "[Syria: Millions of lives at stake if cross-border aid channel closes.](#)" June 18, 2021.

¹⁹ Daily Sabah, "[Russia proposes 6-month cross-border aid renewal as Syrians fear lack of aid.](#)" July 7, 2022.

Since the adoption of Resolution 2165,²⁰ the UNXBM has become the core of donors' approach to NWS and has increased its dominance within the aid landscape as urgent humanitarian need has grown. The SCHF pooled fund is responsible for the vast majority of funds entering the region. As of 2021, UN cross-border aid into NWS amounted to more than US\$ 439 million per year including up to US\$ 154 million (2021) allocated through the SCHF, serving over 2.63 million people a month in the region.²¹ The UNXBM also provides universality and a layer of UN protection for NGOs navigating the extensive compliance and authorization procedures to operate cross-border, which donors would have to do on a case-by-case basis when working directly with implementing partners. Donors' conception of programming allocations therefore largely revolves around and is subject to the UNXBM, both in the quantity of aid it is unparalleled in supplying to the region and the limitations it faces in its short six-month duration, which restricts programming periods and requires contingency planning.

SNGOs in NWS also deem the UNXBM essential for two reasons. Firstly, the scale of in-kind aid items the UNXBM delivers into the region would be near to impossible to replicate by any other actor due to the centrality of UN agencies as conduits of SCHF allocations.²² UN agencies provide specific goods-in-kind to NGO implementing partners, such as health kits, non-food item (NFI) kits, and food baskets, which require UN procurement channels operating solely through UNSC-mandated crossings. For example, SNGOs' distribution of food baskets, which are needed en masse, are heavily reliant on WFP supply pipelines.²³ Such goods-in-kind also include those that cannot be procured in Syria or that are difficult to obtain and need additional support in the import process, such as controlled pharmaceutical supplies.²⁴ The UNXBM is therefore operationally essential to meet prevailing humanitarian needs in the region.

Secondly, SNGOs highlight that the extension of UN cross-border access is imperative on principles of humanitarian need. Common Article 3 to the Geneva Conventions states that impartial humanitarian organizations "may offer their services to the parties to the conflict" including to non-state armed groups (NSAG) and those that live under them.²⁵ The need for a UNSC mandate for UN cross-border assistance is unprecedented, with there being no other region in the world that requires UNSC backing for humanitarian operations by OCHA. Remaining access via Bab al-Hawa is therefore symbolic of an international recognition of the right to humanitarian assistance of the people in NWS. For the SNGO community, there is a fundamental lack of principled logic as to why it is acceptable for life-saving assistance to be prevented from reaching NWS because of a decision by Russia, a country responsible for war crimes conducted against the Syrian public,²⁶ on the UNSC.

KEY ACTORS IN NORTHWEST SYRIA

Complicating the humanitarian response in NWS is the presence of an array of security and governance actors with diverging interests and loyalties in the region. Persistent instability due inter- and intra-fighting, as well as the designation of some actors in the eyes of donors and the UN, presents major obstacles to humanitarian actors operating in NWS.

²⁰ UNSCR, "[Resolution 2165](#)."

²¹ AFNS, "[Frequently Asked Questions](#)," February 15, 2023.

²² KII with SNGO representative.

²³ KII with coordination representative.

²⁴ KII coordination representative.

²⁵ IHL, "[Convention \(III\) relative to the Treatment of Prisoners of War. Geneva, 12 August 1949](#)."

²⁶ OHCHR, "[Report of the Independent International Commission of Inquiry on the Syrian Arab Republic*](#)," February 1, 2018.

NWS is divided between two de-facto governing entities, with each maintaining its own security arm(s). First of these entities is Hayat Tahir al-Sham (HTS), which traces its origins to the onset of the Syrian conflict. Formerly known as Jabhat al-Nusra (JAN), its leader, Abu Mohammed al-Golani, dissolved JAN in July 2016 and purportedly ended the group's affiliation with al-Qaeda. Golani then established Jabhat Fatah al-Sham, which rebranded again in January 2017 when it merged with several other factions to establish HTS.²⁷ Despite its split from al-Qaeda, HTS continues to retain a Salafist-jihadist ideology. In May 2018, HTS was designated by the US as a Foreign Terrorist Organization, adding to the State Department's existing designation of its predecessor, JAN.²⁸ Additionally, HTS is designated as a terrorist entity by the UN, as part of the UNSC's sanctions regime targeting the Islamic State, al-Qaeda and its affiliates.²⁹

In recent years, to enhance its international legitimacy, HTS has attempted to rebrand itself from a global jihadist movement to a de-facto military and governing entity in NWS. In November 2017, HTS formed the Syrian Salvation Government (SSG) to function as the political and administrative arm of the group in Idlib and western Aleppo.³⁰ Owing to its affiliation to HTS, and the latter's terrorist designation, NGOs delicately navigate operating in coordination with the SSG's Ministry of Development and Humanitarian Affairs to adhere to donor compliance requirements, often adding to their administrative burden.³¹

The second governing entity in NWS is the Syrian Interim Government (SIG), formed by the Turkish-backed Syrian opposition groups in 2013 and governs northern Aleppo, most notably areas surrounding Afrin and Azaz. It is largely dependent on Turkey for its administrative capacity and resources, with each sub-district working closely with a corresponding Turkish provincial government.³² This coordination extends to humanitarian actors as well, as NGOs that wish to operate in SIG-controlled areas of NWS are required to register with the corresponding provincial government responsible for their operational area. For instance, in the western subdistricts of Azaz, Suran, and Mare', aid actors are required to register with the local government in Kilis, Turkey. Likewise, if aid actors intend to work in the western subdistricts, they need to acquire work permits from Gaziantep. As for Afrin, work permits must be obtained from Hatay.³³

Additionally, organizations must obtain permits from Turkey's Disaster and Emergency Management Authority (AFAD) for their programming activities.³⁴ Aid distribution and programming in northern Aleppo is tightly controlled by AFAD, with final decision-making on projects lying with Turkish authorities. This arrangement can pose tangible challenges for international relief efforts, as this coordination can often involve stringent regulations.

Following Operation Euphrates Shield (OES), Turkey and the SIG established the Syrian National Army (SNA) in 2017 to secure Ankara's territorial gains.³⁵ The origins of the SNA can be traced back to the Free Syrian Army (FSA), which was initially established in 2011 by defected Syrian military officers. The FSA was a loose alliance of armed opposition groups and emerged as the principal opponent to the GoS. However, it was gradually weakened by infighting, lack of funding, and the rise of rival Islamist groups.

²⁷ ECFR, "[HAYAT TAHRIR AL-SHAM \(SYRIA\)](#)."

²⁸ US Department of State, "[Executive Order 13224](#)."

²⁹ United Nations, "[Sanctions](#)."

³⁰ Wilson Center, "[HTS: Evolution of a Jihadi Group](#)," July 13, 2022

³¹ CSIS, "[RESCUING AID IN SYRIA](#)," February 2022

³² Ibid.

³³ Ibid.

³⁴ Ibid.

³⁵ TRT World, "[What is the new Syrian National Army?](#)"

The SNA is organized into three legions, each of which is further divided into brigades. Although the SNA is regarded as a unified force, many factions within it operate with a great degree of autonomy. This often leads to infighting, altercations with civilians, and the emergence of constantly shifting and self-serving alliances driven by financial incentives. The SNA is seen by some as serving as a counterweight to HTS' opportunist and expansionist aspirations in NWS. It is not uncommon to witness clashes and alliances between specific SNA brigades and HTS, as exemplified by HTS' invasion of Afrin in October 2022.³⁶ A further by-product of the lack of supervision of various SNA factions is the reported violations of human rights³⁷ and accusations of aid interference, which further impedes the work of humanitarian actors in certain areas.³⁸

³⁶ VOA, "[Jihadist Group Takes Over Strategic Town in Northwest Syria](#)," October 13, 2022.

³⁷ Amnesty International, "[Syria: Turkey must stop serious violations by allied groups and its own forces in Afrin](#)," August 2, 2018.

³⁸ CSIS, "[RESCUING AID IN SYRIA](#)," February 2022.

I. SEARCH AND RESCUE OPERATIONS

KEY TAKEAWAY

- Although OCHA made requests to member states on behalf of NWS for USAR teams to be deployed in NWS, seemingly none were sent. The absence was reportedly due to the legal concerns of states over sovereignty as the request did not originate from the GoS and fell outside of UNDAC common protocol. This has illustrated the limitations of an emergency system that is not designed for areas of non-state governance that often contextualize intrastate conflict.

When analyzing the impact of the international humanitarian system on earthquake response in NWS, it is important to distinguish between the initial search-and-rescue phase and the subsequent humanitarian response. This differentiation is crucial because these two components operate on independent systems within the UN infrastructure. While OCHA is responsible for the overall delivery of aid and coordination of humanitarian response, the immediate coordination of search-and-rescue efforts is carried out by a subsidiary agency known as the UNDAC Team.

As was the case in Turkey following the earthquakes, UNDAC teams can be deployed globally within 12 to 48 hours “upon request of the United Nations Resident or Humanitarian Coordinator and/or the affected Government.”³⁹ The agency’s mandate includes establishing on-site coordination centers, assisting with operational planning and leadership, and serving as a vital link between all disaster responders, including humanitarian actors, the affected government, the military, and the private sector. However, UNDAC’s mandate extends beyond the coordination of search and rescue operations to include responses to sudden technological or industrial accidents, for example.⁴⁰ Consequently, UNDAC does not possess its own operational USAR teams specifically for earthquake responses. This responsibility falls under the purview of the INSARAG, a body within the UN umbrella which works towards strengthening and developing an internationally coherent USAR response.⁴¹ INSARAG-classified international USAR teams serve as response assets from the international community, offering their services for deployment to carry out rescue operations in affected countries.⁴² However, it is important to note that this coalition comprises national or private USAR teams that are mobilized from member states, as the UN system itself has no dedicated USAR capacity.

On February 6, the UN shared information through INSARAG detailing the scope and severity caused by the earthquakes to inform member states deploying search-and-rescue teams.⁴³ However, due to the absence of a request from the recognized sovereign government, the GoS, the UN did not activate UNDAC for NWS. The GoS only requested UNDAC support for areas under its own control a week after the initial earthquakes, with an UNDAC team subsequently deployed to Aleppo, Homs, and Latakia on February 13.⁴⁴ This delay likely reduced the overall resources allocated to Syria and the urgency to reach the hardest hit areas in NWS.⁴⁵

³⁹ UNOCHA, “[UN Disaster Assessment and Coordination \(UNDAC\)](#).”

⁴⁰ Humanitarian Response, “[UN Disaster Assessment and Coordination \(UNDAC\) Field Handbook](#),” 2018.

⁴¹ INSARAG, “[Background](#).”

⁴² Humanitarian Response, “[UN Disaster Assessment and Coordination \(UNDAC\) Field Handbook](#),” 2018.

⁴³ United Nations, “[Implementation of Security Council resolutions 2139 \(2014\), 2165 \(2014\), 2191 \(2014\), 2258 \(2015\), 2332 \(2016\), 2393 \(2017\), 2401 \(2018\), 2449 \(2018\), 2504 \(2020\), 2533 \(2020\), 2585 \(2021\), 2642 \(2022\) and 2672 \(2023\) Report of the Secretary-General](#),” April 20, 2023

⁴⁴ Ibid.

⁴⁵ KII coordination representative

Additionally, OCHA's global senior leadership made an additional appeal to member states for USAR assistance to be deployed to NWS within the first week after the earthquakes. But the lack of any official USAR team sent to the region, coupled with anecdotal evidence, suggests that no member state was willing to dispatch teams across the border. This reluctance was reportedly due to uncertainties surrounding the legality of such actions and concerns about potential violations of Syrian sovereignty, despite assurances from the UN.⁴⁶ Notably, neither INSARAG nor UNDAC guidelines provide specific or comparatively extensive guidance on deployment requests and mechanisms in areas that are not under the control of a recognized sovereign authority.

The Syria Civil Defense, also known as the White Helmets, was the only organization in NWS trained in search-and-rescue operations. Although it responded to the crisis immediately, its efforts were severely constrained by limited staff and a lack of efficient disaster-response equipment, which restricted their access to only 5 percent of affected areas.⁴⁷ The organization made an appeal to the UN and the global community, seeking assistance in the form of heavy machinery, specialized rescue teams, and essential equipment. They claim that their requests went unanswered. Although some NGOs operating cross-border deployed search teams, as well as a Qatari and a small French contingent that managed to cross discreetly into NWS, neither had adequate rescue equipment.

In sum, the earthquakes posed new and serious challenges for the tried-and-tested UN emergency response mechanism in the NWS context. There is a recognition among UN agencies and NGOs that this was an unprecedented situation where a colossal natural disaster occurred in an area of remote programming with no state authorization key for activating the 'ultra surge' response mechanisms.⁴⁸ Although broadly deemed efficient in other contexts, actors noted that this scenario required additional understanding of what issues, including limited sovereign governance, have for the UN disaster response system, thereby substantially slowing down the response process. In addition to being symptomatic of the structural confines of remote NWS aid operations, UN member states, including humanitarian donors, had a particularly adverse role in the lack of USAR capacity sent to the region. It therefore highlights risks of an empty circle of accountability for disaster responses that require member state support and underlines the lack of independent capability within the UN and humanitarian agencies to respond to disasters bound by political constraints.

⁴⁶ KII coordination representative.

⁴⁷ New Lines Magazine, "[The Slow UN Earthquake Response in Northwest Syria is Costing Lives](#)," February 10, 2023.

⁴⁸ Ibid.; KII with coordination representative.

II. COORDINATION AND SURGE SUPPORT LIMITATIONS

KEY TAKEAWAY

- Key hubs for humanitarian operations in NWS in Gaziantep and Antakya were severely affected by the earthquakes, received limited surge support, and initially had a lack of senior leadership, leading to significant issues with coordination efforts in the immediate days following the earthquake. Loss of communications channels with NWS and a rush to produce an impracticable number of rapid needs assessments inhibited an informed and coordinated response strategy, illustrating the limitations of remote humanitarian access across politicized borders.

The deficiencies of the earthquake response were also underscored by the inefficiency of existing cross-border aid arrangements and the associated challenges of coordinating humanitarian efforts, especially during natural disasters. NWS aid operations are coordinated by OCHA from the key hubs of Gaziantep and Antakya in Turkey, both of which were significantly affected by the earthquakes. SNGO staff promptly responded to the urgent needs of their communities to the best of their capacity while simultaneously finding themselves personally homeless or looking for relatives among the rubble. However, challenges arose pertaining to coordination efforts between organizations and among different clusters, largely due to the limitations of the existing cross-border modality and the breakdown of communications. These factors, coupled with an apparent lack of senior, international leadership and the politicized difficulties delivering funds and goods to the region, severely hindered the capacity of local actors to provide adequate support in the immediate aftermath of the earthquakes.

These operational and logistical constraints were compounded by the collapse of communication infrastructure in the affected areas due to damages sustained by the earthquake. One member of the Syrian Forum, a consortium of SNGOs, reported that they lost communication with more than 80 percent of the forum's 780 staff across NWS and Turkey.⁴⁹ This communication blackout persisted for several days, significantly hindering their ability to coordinate and organize relief operations effectively. This was further worsened by the widespread loss of essential equipment, such as laptops, as scattered teams were forced to transition to remote arrangements.⁵⁰

The lack of coordination among various organizations also manifested in the plethora of independent and parallel RNAs conducted by SNGOs, leading to research fatigue among communities. Nearly three-quarters of the NWS NGO Forum members carried out their own RNAs, resulting in an impracticable total of 108 RNAs by March 24.⁵¹ Coordinated efforts are crucial for RNAs to ensure a comprehensive understanding and effective response capacity. They are necessary to maintain data continuity and ensure methodological concurrence for subsequent data processing and efficient IM.

⁴⁹ Syria Direct, "[The real response: Earthquake highlights role of Syrian-led relief organizations amid UN paralysis](#)," February 14, 2023.

⁵⁰ AFNS, "[Lessons Learned: A Northern Syria Earthquake Assessment and Response Analysis](#)," March 21, 2023.

⁵¹ OCHA, "[Earthquake initial assessments dashboard February to April 2023](#)," April 10, 2023.

Some efforts were made, including by iMMAP's own IM team, to aggregate data from RNAs onto multi-sectoral dashboards in order to identify existing regional and cluster gaps. Indeed, many SNGOs operating within NWS communities expressed willingness to contribute to a larger unified process but did not have the coordination capacity to implement or define standardized indicators. Despite endorsement by the NGO Forum, there was limited buy-in, communication, and prioritization from OCHA to adopt the initiative more widely among NWS NGOs. Instead, there was a heavy reliance on the comprehensive RNA dataset conducted by REACH, which struggled to provide essential information such as the number of individuals in need within each cluster.⁵² As a result, and despite the abundance of data, there is still no single, multi-sectoral, consolidated database that encompasses earthquake-affected needs. In the critical absence of essential data collection and processing initiatives in Syria such as the Humanitarian Needs Assessment Programme (HNAP),⁵³ this limitation fundamentally hindered the sector's ability to develop an informed and strategic response.

Underlying these coordination challenges was the significant disparity between the surge support deployed to the OCHA Gaziantep office responsible for coordinating the NWS response relative to Istanbul. In Turkey, a comprehensive emergency response system was deployed due to the absence of an OCHA presence prior to the earthquakes. A full UNDAC team, along with several supporting agency staff, was sent within 72 hours to lead the coordination efforts. However, OCHA Gaziantep did not receive the same level of support initially, as it was assumed that the existing office could handle the response.⁵⁴ But the key staff at OCHA Gaziantep were personally affected by the earthquake and were already dealing with staffing gaps. KIIs indeed suggest there was a level of disorientation, as staff attempted to navigate the devastation facing their own communities.⁵⁵ Additionally, the office had been without a Deputy Regional Humanitarian Coordinator (DRHC) for NWS since November 2022, and they had limited information staff available. Although the surge support deficit was addressed relatively quickly by filling the DRHC position in the week following the earthquake, the absence of senior staff severely impeded international coordination efforts needed to scale up the response during the initial period. Having more senior staff dedicated to the response would have substantially assisted diplomatic requests for search-and-rescue capability to international actors, as well as the coordination of outreach and engagement with SNGOs.

⁵² AFNS, "[Lessons Learned: A Northern Syria Earthquake Assessment and Response Analysis](#)," March 21, 2023.

⁵³ Devex, "[Exclusive: The day the data died in Syria](#)," May 12, 2023.

⁵⁴ KII coordination representative.

⁵⁵ KII coordination representative.

III. VULNERABILITY OF CROSS-BORDER MECHANISMS

KEY TAKEAWAY

- Amid debates around the politicization of cross-border access during the earthquakes, the UNXBM and its corresponding notification systems brought additional logistical challenges for UN agencies efforts to send emergency relief to NWS via Bab al-Hawa. A lack of clarity around the use of Emergency Notification Submissions and changes to the notification request procedure, including the time period of advance notice required for shipments, contributed to a level of confusion and operational strain among partners. This poses questions regarding the suitability of the UNXBM to respond flexibly to such urgent humanitarian disasters and the need for more resilient modalities in parallel.
- Although necessary to expand all avenues of international aid to NWS, the approval by GoS of a further two border crossings may have come at the cost of a longer duration of access and has struggled to scale-up operations due to a lack of SNGO capacity to adapt supply chains, which continued to operationalize commercial crossings. However, consolidating the use of this modality is currently restricted by the lack of available data on its usage by the humanitarian sector, with the UNXBM therefore remaining essential.

BAB AL-HAWA AND THE HUMANITARIAN NOTIFICATION SYSTEM

Cross-border access issues for humanitarian aid into NWS were starkly exposed during the earthquakes. Whereas Turkey and GoS saw international aid rapidly flow in from all corners of the world, earthquake assistance for NWS was slow and politicized with fatal consequences. Although a convoy consisting of six trucks entered NWS through Bab al-Hawa on February 9, respondents noted that this was part of a pre-scheduled shipment prior to the earthquake and did not deliver specialized earthquake response assistance, but rather contained NFIs, hygiene kits, and shelter items.⁵⁶ Perceived inaction on the part of the UN was met with condemnation by INGOs and SNGOs with growing accusations regarding barriers to access.⁵⁷ Logistically, there was indeed a level of road damage between Gaziantep and the UN Transshipment Hub in Hatay as a result of the earthquake,⁵⁸ and several of the staff on the Turkish side of the Bab al-Hawa border crossing were absent to deal with their own personal circumstances.⁵⁹ But, crucially, the lack of specialized-earthquake assistance in the first shipments that made it through Bab al-Hawa was notable, and occurred in the context of significant logistical challenges in the transshipment process.

Every humanitarian shipment via the UNXBM from the UN Transshipment Hub in Hatay is submitted through the HNS, which informs parties to the armed conflict in Syria of an upcoming UN cross-border shipment into NWS. Under the HNS, UN agencies submit shipment plans to the Logistics Cluster, which are then shared with OCHA Gaziantep. The DRHC compiles these into a notification, which is signed and submitted by OCHA to the GoS and Turkish government at least 48 hours prior to the shipment crossing the border.⁶⁰ It is important to note that an absence of the HNS

⁵⁶ Al Jazeera, "[First UN convoy since quake enters northwest Syria from Turkey](#)," February 9, 2023.

⁵⁷ CARE International, "[Syria: 35 INGO and Syrian NGOs demanding unfettered access and massive scale-up of humanitarian response](#)," February 15, 2023.

⁵⁸ Logistics Cluster, "[Türkiye/Syria Earthquake - Global Coordination Call, Meeting Minutes & Presentation, 8 February 2023](#)," February 9, 2023.

⁵⁹ I/II coordination representative.

⁶⁰ Logistics Cluster, "[Standard Operating Procedures \(SOPs\) - UN Cross-border Operations from Türkiye to Syria, October 2022](#)" October 2022.

procedure does not nullify the protection of humanitarian shipments under international humanitarian law (IHL). The notification is solely informative and cannot be used as a mechanism for parties to the conflict to approve or deny specific humanitarian operations.⁶¹ A separate but corresponding supervisory system is also managed by the UNMM to confirm the humanitarian nature of shipments. The UNMM is looped into the DRHC's notification submission, and then notifies the GoS of the shipment's humanitarian nature after it has reached its stated warehouse.⁶²

For time-sensitive crises, there is also an 'Emergency Notification Submission' procedure that allows for cross-border shipments within less than 48 hours.⁶³ The UN agency wishing to send an emergency shipment must first obtain approval from the Humanitarian Coordinator (HC) in Damascus before a notification can be issued. Once this is obtained, the Logistics Cluster is informed to process the notification, with OCHA issuing the notification to stakeholders as per normal procedures. Logistics Cluster meeting minutes following the earthquakes suggest that the UNFPA were the first UN agency to submit a request for approval for an emergency notification of a shipment on February 9, three days after the earthquakes hit.⁶⁴ The shipment is registered as reaching its destination via Bab al-Hawa 48 hours later, on February 11.⁶⁵ However, in the weeks following the earthquake, the wider adoption and adaptation of the HNS to the earthquake context resulted in a level of confusion and coordination limitations with the UNMM.

Firstly, OCHA rolled out a new online portal system for UN agencies' shipment plans and notification requests on February 8 to replace the previous procedure of emailing a service request form to the logistics cluster lead.⁶⁶⁶⁷⁶⁸ Although OCHA conducted multiple training webinars on the new HNS system between February 13-16 and offered to revert to the old system if deemed necessary, meeting minutes over the next two months indicate a continued level of disruption in submitting notification requests on time.⁶⁹⁷⁰ Secondly, until March 3, UN agencies were required to submit shipment plans at least 72 hours in advance, with partners requested to adhere closely to this notification window that was also stipulated by the GoS.⁷¹⁷² However, some UN agencies expressed concerns with the length of this notification window due to a lack of predictability in their supply pipelines during the emergency response. An OCHA Access Unit meeting was subsequently held to explore a reduction of the window.

Clarification was issued by email to partners after OCHA Gaziantep reportedly "received an exceptional window of 24 hours' notice" for any movement to anywhere in NWS.⁷³ It was also noted that the HNS was a voluntary mechanism and independent to the mandatory UNMM, although the HNS must closely coordinate with the UNMM for Bab al-Hawa cross-border shipments. With the changes in the submission format and notification window, by March 28, difficulties were identified in anticipating truck arrivals at Bab al-Hawa, "leading to hiccups" at the transshipment hub and in regard to coordination with UNMM.⁷⁴

61 Humanitarian Response, "[Concept Note on Humanitarian Notification in Support of Access and Protection in Syria April 2021](#)," April 2021.

62 Humanitarian Response, "[United Nations Monitoring Mechanism \(UNMM\)](#)."

63 Logistics Cluster, "[Standard Operating Procedures \(SOPs\) - UN Cross-border Operations from Türkiye to Syria, October 2022](#)" October 2022.

64 Logistics Cluster, "[Türkiye/Syria Earthquake - Meeting Minutes, Gaziantep, 10 February 2023](#)," February 12, 2023.

65 OCHA, "[Earthquake Response Cross Border Operation from Türkiye to Northwest Syria \(since 9 February\)](#)," June 13, 2023.

66 Logistics Cluster, "[Türkiye/Syria Earthquake - OCHA - Humanitarian Notification System \(HNS\) for Syria - Presentation](#)," February 19, 2023.

67 Logistics Cluster, "[Syria - Service Request Form \(SRF\)](#)," January 9, 2023.

68 Logistics Cluster, "[Syria - Standard Operating Procedures \(SOPs\) - Turkey Cross-Border Operations, October 2022](#)," October 13, 2022.

69 Logistics Cluster, "[Türkiye/Syria Earthquake - Meeting Minutes, Gaziantep, 10 February 2023](#)," February 12, 2023.

70 Logistics Cluster, "[Türkiye/Syria Earthquake - Meeting Minutes, Gaziantep, 13 February 2023](#)," February 14, 2023.

71 Logistics Cluster, "[Türkiye/Syria Earthquake - Meeting Minutes, Gaziantep, 3 March 2023](#)," March 7, 2023.

72 Logistics Cluster, "[Türkiye/Syria Earthquake - Meeting Minutes, Gaziantep, 10 March 2023](#)," March 13, 2023.

73 Logistics Cluster, "[Türkiye/Syria Earthquake - Meeting Minutes, Gaziantep, 7 March 2023](#)," March 9, 2023.

74 Logistics Cluster, "[Türkiye/Syria Earthquake - Meeting Minutes, Gaziantep, 28 March 2023](#)," March 3, 2023.

UNMM capacity was put under great pressure to execute the required supervision of humanitarian shipments in the months following the earthquakes, particularly in setting up standards of procedure for the additional two approved Bab al-Salameh and al-Rai crossings. This involved a more minimal process, with shipments requiring no GoS notification and only simple visual checks at the further two crossings.⁷⁵ But with HNS not required, trucks were being checked on an ad hoc basis, with no planning system established a month after the earthquakes.⁷⁶ By May 2, warnings were still being raised at Logistics Cluster meetings over the pressure a lack of communication regarding transshipments across all border-crossings was inflicting on monitoring purposes.⁷⁷ A week later, the UNMM noted that transshipments would now only be monitored at weekends or in the case of emergencies in order to protect duty of care needs of UNMM staff.⁷⁸

It is unclear whether more UN agencies utilized the emergency notification system in the immediate days following the earthquake. However, even if they did, there was a clear bottleneck in the ability of UN agencies to submit requests and receive approval from Damascus on time in a manner that facilitated organized transshipment movements. Additionally, KII suggest that there may have been further delays for up to a week in waiting for HC approval for such shipments from Damascus.⁷⁹ Nevertheless, some may retain the criticism that it still took five days for assistance to reach NWS using the system made for urgent emergencies, which is fundamentally unsuitable for the ‘golden period’ of an earthquake response. However, this criticism should be accurately directed. As illustrated by the clear strain on the accompanying UNMM system once notification periods had been expedited, there is a limit to the levels of assistance that can be processed in a disaster-affected area with seemingly little additional support. Attention should be directed towards the tangible logistical implications of the UNXBM itself which has been set up in a manner of overcompliance in respect to the sovereignty of the GoS, despite the legality of humanitarian aid shipments. Consequently, questions can be raised over the need to scale-up more resilient cross-border aid routes that are not subject to this political interpretation of IHL in emergency contexts which require additional logistical measures.

ADDITIONAL CROSSINGS: BAB AL-SALAMEH, AL-RAI, AND COMMERCIAL ROUTES

Simultaneously to establishing swift movements through the Bab al-Hawa transshipment route, OCHA submitted a request to the GoS for the opening of the further two border crossings, Bab al-Salameh and al-Rai, for UNXBM use. As the humanitarian impact of NWS’s isolation became clear, criticism had grown louder against the political choices and perceived lack of action by the UN. Following a visit to the region, UN Emergency Relief Coordinator Martin Griffiths acknowledged on February 12 that the international community had “failed the people in [NWS]” in its earthquake response.⁸⁰ The next day, having been approached by the UN with requests for permission several days earlier, UN Secretary-General Antonio Guterres revealed that the GoS had agreed to open the two additional aid corridors for a limited period of three months.

⁷⁵ Logistics Cluster, “[Türkiye/Syria Earthquake - Meeting Minutes, Gaziantep, 15 February 2023](#),” February 18, 2023.

⁷⁶ Logistics Cluster, “[Türkiye/Syria Earthquake - Meeting Minutes, Gaziantep, 10 March 2023](#),” March 13, 2023.

⁷⁷ Logistics Cluster, “[Türkiye/Syria Earthquake - Meeting Minutes, Gaziantep, 2 May 2023](#),” May 4, 2023.

⁷⁸ Logistics Cluster, “[Türkiye/Syria Earthquake - Meeting Minutes, Gaziantep, 9 May 2023](#),” May 10, 2023.

⁷⁹ KII coordination representative.

⁸⁰ Twitter, “[Martin Griffiths](#),” February 12, 2023.

The GoS timed its approval of the further two crossings for UN operations strategically, making the announcement just prior to a UNSC meeting where a proposed resolution to open the two crossings for a period of 12 to 18 months was reportedly to be discussed. The anticipated resolution was reportedly leaked to the regime,^{81,82} which undermined the possibility of extracting concessions from the GoS regarding visa exemptions for emergency responders and greater oversight of cross-line assistance, as well as removing the possibility of ensuring a longer period of access. It also allowed the GoS to convey an image of acting out of goodwill rather than being submitted to a force majeure by western powers. As approval was granted by the GoS for the further two crossings, concerns subsequently rose over which concessions the regime may force from humanitarian actors at the next UNSC vote for access through Bab al-Hawa in July.

Cross-line aid is currently tangibly ineffective at supporting humanitarian programming in NWS, due to extensive evidence to show systematic aid diversion and obstruction by the Assad regime, as part of its consistent strategy to besiege areas of opposition during the conflict.⁸³ Facilitating greater cross-border access was therefore a prerequisite for maximizing all channels of aid into the region. However, between February 13 and May 13, 2143 trucks of aid have entered into NWS, with only 307 from Bab al-Salameh, and 68 from al-Rai.⁸⁴ SNGOs did not have the capacity at the time to immediately replicate supply chains amid an operational climate that requires extensive due diligence in the procurement and distribution of aid.

This illustrates how GoS approval for the further two crossings cannot compensate for the renewal of the UNSC mandate for Bab al-Hawa access in July, as it is the largest cross-border operation in Syria with direct access to the UN Transshipment Hub in Hatay. The mass of assistance moved through Bab al-Hawa is unparalleled in its coordination and inclusion in incumbent supply chains, with the two other crossings unable to function at this scale of operation. The expansion of cross-border access to Bab al-Salameh and al-Rai did, however, have symbolic significance in demonstrating that humanitarian provision for civilians in need should not be prevented by any party to conflict.

Nevertheless, KII noted that Bab al-Hawa was the first border crossing officially mandated by the UNXBM from the historical trade center of Sarmada in Syria, and therefore has the strongest significance for SNGOs.⁸⁵ This has underwritten the consolidation of Bab al-Hawa and its UNXBM mandate at the center of cross-border aid operations for NWS, and so cannot be allowed to be forfeited for extensions to the other two crossings.

Additionally, many SNGOs continued to use commercial crossings to import emergency earthquake assistance into NWS, which faced minimal delays, rather than expanding their use of the UNXBM.⁸⁶ Alternative crossings have been used by organizations throughout the Syrian crisis and remained commercially active during the earthquake, with Saudi Arabia and Médecins Sans Frontières (MSF) sending humanitarian convoys through al-Hamam crossing near Jindires in the following days.⁸⁷ While political barriers obstructed the delivery of UN aid to NWS, the head of the White Helmets, Raed Al-Saleh, noted that large deliveries of bilateral aid from Saudi Arabia and Qatar sent through these commercial routes arrived in opposition-held territory ahead of deliveries from UN agencies.⁸⁸

81 KII coordination representative.

82 Reuters, "[Exclusive: Assad approved Syria quake aid with a UAE nudge, sources say](#)," February 23, 2023.

83 Amnesty International, "[Syria: UN must continue cross-border aid regardless of UN Security Council or Syrian government approval](#)," May 12, 2023.

84 OCHA, "[Earthquake Response Cross Border Operation from Türkiye to Northwest Syria \(since 9 February\)](#)," June 13, 2023.

85 KII coordination representative.

86 KII coordination representative.

87 Doctors Without Borders, "[Turkey-Syria earthquakes: First MSF supply convoy enters northwestern Syria](#)," February 19, 2023.

88 Al Jazeera, "[Syria White Helmets criticise UN over Assad say on aid deliveries](#)," February 14, 2023.

It has additionally been noted by KIIs that no supplies would have reached NWS at all had it not been for the rapid operationalization of commercial crossings by the NGO community.⁸⁹ At the time, a spokesperson for the Bab al-Hawa border crossing posed the question to as to why road access permitted the transport of the bodies of Syrian casualties from Turkey into NWS, but no UN aid convoys were able get through.⁹⁰ However, there is currently a significant lack of data regarding commercial border use for humanitarian shipments into NWS, which has so far prohibited efforts to scale-up and coordinate operations. So long as this remains the case, the UNXBM will continue to play an essential role in the NWS humanitarian landscape.

Despite its centrality to aid operations and the wide focus on emergency humanitarian relief within the NWS aid landscape, the earthquakes exposed the limitations of the UNXBM in managing a crisis response. This was likely in part due to the logistical challenges of the HNS' adaptation to an emergency process and its underlying commitment to GoS sovereignty. Additional deference to the GoS for the approval of a further two border crossings illustrates how the UN prioritized considerations of sovereignty over urgent humanitarian needs, depriving disaster-stricken NWS of critical resources. The disparity in the response of the UNXBM and that of SNGOs exhibiting their local capacity via commercial channels has amplified calls for a reassessment of current dependency on the UNXBM and a willingness to explore complementary cross-border aid modalities to increase the resilience of cross-border operations.

⁸⁹ KII with SNGO representative.

⁹⁰ CNN, "[Secondary disaster' looms as UN aid finally reaches survivors battling frozen conditions in Syria.](#)" February 10, 2023.

IV. THE ISOLATION OF SNGOS AND DUTY OF CARE DEFICIENCIES

KEY TAKEAWAY

- SNGOs and local actors were under a disproportionate amount of pressure as they grappled with a severely impeded cash transfer system, lack of pre-positioned supplies, the monopolization of key goods, and price surges. Despite staff being impacted themselves, SNGOs exhibited high resilience to continue operations through commercial crossings and conduct needs assessments. However, the earthquake also highlighted the difficulties of providing adequate duty of care for SNGOs in NWS during emergencies due to the restricted financial system.

A symptom of UNSC-mandated cross-border access has been the isolation of the SNGO community in NWS, as limited access for UN agencies and INGOs to the region has meant that SNGOs predominantly implement programming on-the-ground. Despite the personal impacts on staff in NWS, the ability of SNGOs to respond rapidly to the earthquakes showed remarkable resilience, ensuring supplies could continue to be imported via commercial crossings and conducting needs assessments throughout the region as required. However, SNGOs remained operationally restricted by the financial and cross-border systems in the region.

SNGOs faced a crippling lack of available supplies and heavy machinery as a consequence of insufficient pre-positioning of resources in NWS due to the relatively volatile security situation, in addition to the politicization of border crossing approvals.⁹¹ Many SNGOs found themselves in competition both with each other and the earthquake-affected communities themselves to source essential supplies locally. Monopolization of key supply chains proliferated, leading to exponential increases in the prices of relief items and search and rescue equipment.^{92,93}

Due to the funding structure of NWS programs and donor response, a significant portion of emergency financial resources for the earthquakes passed through the UN pooled fund system. This meant that funds were initially routed through the SCHF, then allocated to INGOs, and finally deposited to the local SNGOs leading the response on-the-ground. However, as NWS falls outside of government control and banks face the sanctions impact of de-risking, NWS has no formal banking sector. Crucially, a primary, informal money transfer system into NWS, known as *hawala*, became practically non-functional following the earthquakes. Standard hawala procedure comprises advance engagement with hawala agencies to transfer amounts of cash needed and organize the time, location, and ultimate recipient of the funds, with the agencies facilitating distribution once the cash becomes available. The regular payment of salaries is thus usually planned in advance. However, the combination of a rush to send funds, a sharp increase in the local demand for cash (USD), and a sheer shortage of supply left organizations with no means to distribute cash to NWS staff from the urgent influx of funds to SNGOs.

Wide variations and increases in the facilitation fees of hawala agencies emerged, leading to subsequent issues for INGOs who are generally limited by donor government requirements as to which hawala agencies pass compliance checks and how high a fee for a transaction they can accept.⁹⁴ One INGO noted they have had to increase fees paid to hawalas in order to ensure release of cash upon request prior to the funds reaching the agency from foreign accounts, which can often be delayed by intermediary banks' investigations as a result of sanctions compliance

⁹¹ KII with SNGO representative.

⁹² KII coordination representative.

⁹³ Logistics Cluster, "[Türkiye/Syria Earthquake - Meeting Minutes, Gaziantep, 15 February 2023](#)," February 18, 2023.

⁹⁴ KII with INGO representative.

investigations.⁹⁵⁹⁶ INGOs therefore not only were facing a limited supply of cash within NWS, but also had to deal with headquarters and donor hesitation to offer flexibility due to a reported lack of comprehension of the scale and implications of the earthquakes on the operational financial system.⁹⁷ As a consequence, staff inside NWS were forced to ask friends and relatives to borrow money for humanitarian programming and reimburse them once INGOs were able to obtain and distribute cash inside the region.⁹⁸

The payment of salaries for staff inside NWS was similarly affected, exacerbated by the occurrence of the earthquakes at the time of regular salary payouts. In the case of one INGO, payroll is processed at the end of the month for the thirty days prior, with salaries paid out to staff within a week.⁹⁹ The timing of the earthquake on February 6 coincided with their payouts for the month of January, preventing staff from collecting salaries from their assigned hawala. The sustained disruption to the hawala system also prevented INGOs from issuing advance salary payouts for February, as well as duty of care financial packages to cover accommodation, transportation, and evacuation costs.

The earthquakes therefore not only affected the immediate, operational relief efforts of SNGOs but also had a significant impact on organizations' ability to establish and enforce effective duty of care protocols for their employees. In the weeks after the earthquakes, many aid workers in Gaziantep and Antakya were living in temporary shelters or cars, rendered homeless by damaged buildings or the danger of aftershocks.¹⁰⁰ At least 79 NWS-based aid workers died in the earthquakes, in addition to countless relatives of survivors.¹⁰¹ This not only impeded the coordination and function of emergency humanitarian response but has an immeasurable impact on the emotional and mental well-being of colleagues.

Multiple interviewees for this report voiced their dissatisfaction with an unacceptable lack of preparation and prioritization by the donor community of a duty of care protocol for SNGO staff, who have been at the forefront of a traumatic humanitarian response in Syria for over a decade. NWS staff have often taken on a disproportionate level of risk in dealing with local authorities, operating in active conflict, and becoming the target of military operations themselves. They have suffered many of the same impacts on mental health and displacement as the Syrians they work to protect.¹⁰² Duty of care featured prominently in donor conversations in 2020 following the GoS's assault on the Idlib M4, after similar mass displacement was triggered with staff incurring significant costs as NGOs relocated and accommodation in neighboring areas skyrocketed.¹⁰³ Although some INGOs, in partnership with donors, have since established duty of care coordination frameworks, no harmonized UN system for effective procedures to protect staff in crisis contexts has been developed during the Syrian conflict.¹⁰⁴

Although the earthquakes provided added impetus for discussions around an actionable strategy for duty of care of SNGO staff, INGOs are still having to dedicate concerted effort to engage donors to cover the costs.¹⁰⁵ More commonly, donors who acknowledged a duty of care need for implementing partners following the earthquakes have asked for these funds to be allocated from existing project budgets instead of providing additional funds, yielding implications for program budgets. In some cases, this left INGO staff to independently initiate community collections to raise funds for their colleagues in NWS.

⁹⁵ Ibid.

⁹⁶ CSIS, "[RESCUING AID IN SYRIA](#)," February 14, 2022.

⁹⁷ KII with INGO representative.

⁹⁸ Ibid.

⁹⁹ Ibid.

¹⁰⁰ Syria Direct, "[The real response: Earthquake highlights role of Syrian-led relief organizations amid UN paralysis](#)," February 14, 2023.

¹⁰¹ OCHA, "[North-West Syria: Situation Report \(25 February 2023\)\[EN/AR\]](#)," February 25, 2023.

¹⁰² The New Humanitarian, "[Who helps the helpers? Earthquakes put spotlight on aid workers' needs](#)," May 4, 2023.

¹⁰³ KII with INGO representative.

¹⁰⁴ KII with SNGO representative.

¹⁰⁵ KII with INGO representative.

The issue of duty of care in NWS illustrates the human consequences of the region's constraint as an area of remote humanitarian programming. Limited cross-border access and a financial system that has been effectively repressed by the de-risking and chilling effects of sanctions fundamentally inhibits a practicable duty of care procedure at a time of crisis, when the informal hawala system is at its most vulnerable. Remedying this requires a nuanced examination of the unintended consequences of sanctions regimes and counterterrorism regulations in NWS in order to protect the capacity of SNGOs, while staying committed to holding the perpetrators of violence during the Syrian conflict to account.

The resilience of SNGOs and the civil society space in NWS throughout the crisis, and particularly after the earthquakes, shows how vital these organizations are to the region's humanitarian response. As those closest to the issue at hand, SNGOs have the expertise to identify areas of more strategic and integrated approaches to programming that will offer most efficient uses of ever-dwindling funding. However, with an overwhelming sentiment that the international community, and the UN, was fatally slow in their response to support the NWS aid sector during the earthquakes, many SNGOs been left with feelings of abandonment in the shadow of a staggering humanitarian crisis. The allocation of increased funding to the Syrian crisis is not sufficient to remedy this sentiment. There must be a concerted effort from the international community to better understand and address the operational constraints of SNGOs so that they can be empowered to take on the next stage of humanitarian action in NWS.

CONCLUSION

Part 1 of this Ad Hoc series has explored how February's earthquakes highlighted the ways in which the humanitarian landscape that has become entrenched over the last twelve years is limited in its ability to respond to urgent crises in NWS.

Issues with remote humanitarian access and programming were illustrated by failures in the coordination of SNGOs to deliver an effective immediate surge response on-the-ground, despite remarkable local operational resilience. Access difficulties similarly apply to the financial system in NWS that has been restricted by the impact of sanctions with little help offered to NGOs to navigate it. Subsequently, the earthquake-impact on the informal hawala money transfer system fundamentally undermined the capacity of NGOs to execute a duty of care for their staff. The inapplicability of UN emergency protocols designed for an intergovernmental organization to areas of non-state governance, such as those seen in NWS, was shown by the reluctance of member states to deploy USAR teams to the region. There was also a noted lack of deployment of a comprehensive emergency system sent to OCHA Gaziantep in contrast to that received by OCHA Turkey. Although initially mandated by the UNSC to provide a guarantee for humanitarian access, the deference of the UN to the GoS to expand and apply the UNXBM to an emergency response for an indiscriminate natural disaster demonstrated the over-inflated role a respect for sovereignty plays in the NWS aid landscape. The UNXBM has become an undeniably essential pillar of humanitarian relief efforts in NWS, but this politicization has logistically embedded itself in a notification and monitoring system which presents a series of obstacles to the management of an urgent crisis. Alternative cross-border modalities, including the use of commercial crossings, demonstrated their resilience during the earthquakes, but are currently unable to facilitate a complementary mechanism alongside the UN in due to a lack of comprehensive data regarding their usage.

These system failures also indicate current barriers to an evolution of a humanitarian strategy in NWS that can more effectively address the needs of its inhabitants, which are now more critical than ever before. The earthquakes and an examination of the response can provide humanitarian stakeholders with an inflexion point to inform a more strategic, integrated, and considered approach, that is more appropriate for this phase of the Syrian crisis. **Part II** of this Ad Hoc series will work towards this by unpacking some of these barriers to highlight which elements of the existing humanitarian system in NWS should be reassessed.

Firstly, there must be a reconsideration of the excessive role and prominence of sovereignty in the NWS humanitarian infrastructure, that is inherently in conflict with the principles underpinning IHL. Humanitarian principles should instead drive the development of resilient aid access to a population that has been systematically targeted by its own government and now lives under the de-facto authority of non-state actors. Secondly, as twelve years of conflict have taken a compounded toll on NWS infrastructure and services, a longer-term, integrated approach to humanitarian programming must be developed. Growing consensus among actors regarding a shift to an 'early recovery' phase needs to go beyond the semantic terminology of isolated projects to embody a mindset shift in the opportunities and methods that can improve humanitarian conditions. Thirdly, alternative, complementary cross-border funding mechanisms should be developed to work alongside and fill the gaps of the UNXBM. In order to move communities on from a dependency on humanitarian relief towards sustaining their needs, an ability to implement longer programming cycles and greater flexibility in program classification will be essential.

Finally, the nuanced impact of sanctions regimes will need to be examined to ensure that arguments surrounding their negative impact on humanitarian operations will not be undermined by those defending sanctions to ensure accountability for those that have committed atrocities during the crisis. For the last twelve years, SNGOs have persistently demonstrated their adaptability, diligence, and resilience in continuing to deliver humanitarian programming under severe circumstances. If NWS humanitarian strategy is to move to deliver more early recovery-focused programming, SNGO capacity must be supported by the donor community to navigate how they can implement

CONCLUSION

sustainable humanitarian programs in areas of sanctioned authority.

There are inevitably considerable barriers facing the implementation of such an approach. Notably, funding shortfalls, programming interruptions from any modality transitions, and the timeframes in which these elements may need to be developed all are risks that require adequate anticipation and planning. However, a continuation of the status quo of the NWS humanitarian landscape is broadly recognized to be unacceptable, while a loss of the momentum provided by the earthquakes would be deemed as a devastatingly missed opportunity. Buy-in from the donor community is therefore essential in this post-earthquake period, in addition to a constructive attitude of cooperation between the leadership of humanitarian stakeholders in NWS.