

THE LAW AND FGM/C Türkiye 2026



About Orchid Project

Orchid Project is a UK- and Kenya-based non-governmental organisation catalysing the global movement to end female genital cutting (FGC). Orchid Project's strategy for 2023 to 2028 focuses on three objectives:

1. To undertake research, generate evidence and curate knowledge to better equip those working to end FGM/C
2. To catalyse, support and strengthen regional networks to actively participate in the movement to end FGM/C
3. To influence global and regional policies, actions and funding to end FGM/C.

Orchid Project's aim to expedite the building of a knowledge base for researchers and activists is being fulfilled in the **[FGM/C Research Initiative](#)**.

About Wadi

Founded in 1992, Wadi's mission is rooted in the fundamental belief that true development only occurs when individuals possess the power to decide their own futures. We don't provide aid—we support communities to find local resilient solutions rooted in our fundamental beliefs in human rights and equality. Our strategy remains consistent: we provide the platform, but the community provides the voice.

Wadi pioneered the fight against FGM/C in Iraqi Kurdistan through grassroots action, media campaigns, and lobbying at a local and international level. This work has never stopped, only evolved to include the myriads of other forms of gender issues in the area and we continue to work to empower women through literacy, education, vocational education, women's health access in order to combat the systemic roots of gender-based violence.

Authors: Caroline Pinder, Ozan Yücel (ed.)

Acknowledgements: Hogan Lovells International LLP

Recommended citation: Orchid Project (2026) *The Law and FGM/C: Türkiye*. Available at **<https://www.fgmc.org/country/Türkiye>**

For more information, please contact Orchid Project at **research@orchidproject.org**.



WORKING TOGETHER TO END
FEMALE GENITAL CUTTING

Overview of Domestic Legal Framework

Overview of Domestic Legal Framework in Türkiye	
<i>The Constitution explicitly prohibits:</i>	
x	Violence against women and girls
x	Harmful practices
x	Female genital mutilation (FGM/C)
<i>National legislation:</i>	
x	Provides a clear definition of FGM/C
✓	Criminalises the performance of FGM/C under the Penal Code
x	Criminalises the procurement, arrangement and/or assistance of acts of FGM/C
x	Criminalises the failure to report incidents of FGM/C
x	Criminalises the participation of medical professionals in acts of FGM/C
x	Criminalises the practice of cross-border FGM/C
x	Government has a strategy in place to end FGM/C

Introduction



Figure 1: Map of Türkiye(1)

The Republic of Türkiye is a presidential republic that shares borders with eight nations. Its longest borders are in the south and south-east, with Iran, Iraq and Syria, and the Kurdistan region spans these countries' shared boundaries. The population of Türkiye is 92 million (2), of which 70-75% are Turkish and 18-20% Kurdish (the remainder are other minorities) (3). In recent years, there has been increased development in the area around the Tigris and Euphrates rivers in south-east Türkiye, near the borders with Iraq and Iran; the area is mainly inhabited by Kurds. This area is sometimes referred to as Northern or Turkish Kurdistan, but unlike Iraqi Kurdistan, the Kurdish (2) region in Türkiye is not recognised as an autonomous region with its own government. 98% of Türkiye's population is Muslim (mostly Sunni). The remainder are mostly Christians, unaffiliated or other.

Note on Terminology

In Middle Eastern countries female circumcision is sometimes referred to as *khatana* or *sunat*. In most reports about the practice in Türkiye the term FGM/C is used (or sometimes female circumcision). However, for consistency across Orchid's law reports the term FGM/C has been used throughout.

Female genital cutting is classified into four major types by the World Health Organization (WHO):

Type 1: This is the partial or total removal of the clitoral glans (the external and visible part of the clitoris, which is a sensitive part of the female genitals), and/or the prepuce/clitoral hood (the fold of skin surrounding the clitoral glans).

Type 2: This is the partial or total removal of the clitoral glans and the labia minora (the inner folds of the vulva), with or without removal of the labia majora (the outer folds of skin of the vulva).

Type 3: Also known as infibulation, this is the narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the labia minora, or labia majora, sometimes through stitching, with or without removal of the clitoral prepuce/clitoral hood and glans.

Type 4: This includes all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping and cauterizing the genital area (4).

Prevalence of FGM/C

There is very little data about the prevalence of FGM/C in Türkiye. However, given that it is practiced in certain Kurdish communities and in the neighbouring regions of Iraqi Kurdistan and northwest Iran, it is very likely that the practice is also carried out in the south-eastern parts of Türkiye that are mainly inhabited by Kurds. Approximately 18-20% of Türkiye's population is Kurdish; therefore, there is likely some sort of prevalence of FGM/C within this community.

The four-decade long tension between Turkish and Kurdish people, sustained by the armed conflict between Türkiye and the Kurdistan Workers' Party (PKK), has meant that Kurds are often excluded from national statistics and country reports. To this day, Türkiye's government does not recognise Kurdish people as a minority group (3). Therefore, it is possible that if FGM/C does occur amongst Kurdish people residing in Türkiye, the practice is underreported and absent in official national reports.

It has been suggested the practice in Türkiye is related to migration: one study revealed 97.5% of Somali women living in Türkiye have experienced FGM/C (5).

Further information about FGM/C in Türkiye is available at:

<https://www.fgmc.org/country/turkey>

National Legal Framework

Türkiye has a civil law system based on various European systems, notably the Swiss Civil Code.

The highest courts are the Constitutional Court (Anayasa Mahkemesi), the Court of Cassation, and the Council of State. The Constitutional Court consists of the President, two vice-presidents, and 12 judges; the Court of Cassation has around 390 judges and is organised into civil and penal chambers; and the Council of State is organised into 15 divisions (14 judicial and one consultative), each with a division head and at least five members. At the lower level there are regional appeals courts; basic (first instance) courts; peace courts; aggravated crime courts; and specialised courts that cover administrative and audit matters (3).

The **Constitution of the Republic of Türkiye** (6) states that 'Men and women have equal rights' and 'The State has obligations to ensure that this equality exists in practice.' (**Article 10** as amended 2004). **Article 17** goes on to state 'The corporeal integrity of the individual shall not be violated except under medical necessity [...]' and under **Article 41** (as amended 2010) 'The State shall take measures for the protection of the children against all kinds of abuse and violence.'

Applicable general laws

There is no specific law criminalising FGM/C in Türkiye. However, certain provisions of the **Turkish Penal Code** (7) can be read as addressing and prohibiting FGM/C practices, and if FGM/C is held to be a criminal offence under the Penal Code, then other aspects of the Penal Code can be applied, for example assisting in a criminal offence, or failing to report a criminal offence. This hinges on recognition of FGM/C as a criminal offence.

Turkish Penal Code (Law No 5237, 2015) (7):

This includes several clauses that could be applied to FGM/C, ranging from intentionally causing pain to another to death resulting from FGM/C.

Article 85(1) provides that where any person 'causes the death of another by reckless conduct', they will be punished by imprisonment of 2-6 years.

Article 86(1) states: 'any person who intentionally causes another person physical pain or who impairs another person's health [...] shall be sentenced to a penalty of imprisonment for a term of one to three years.' Penalties range from imprisonment for four months to a year, though this will be increased if the injury is committed against a 'direct descendant', or if the intentional injury results in 'permanent impairment of the functioning of any one of the senses or organs of the victim.' It could be argued

that intentional and permanent damage to a girl's clitoris is impairment of the functioning of an organ.

Child Protection Law No 5395 (2005) (8)

Whilst most of this law relates to how young people should be treated within the justice system, it also sets out fundamental principles and rights regarding protection of young people to safeguard their health, which could be taken as applicable to protecting and preventing them undergoing FGM/C:

Article 1- (1) *The purpose of this Law is to regulate the procedures and principles with regard to protecting juveniles (8) who are in need of protection or who are pushed to crime, and ensuring their rights and well-being.*

Article 3- (1) (1.) *Juvenile in need of protection: Any juvenile whose physical, mental, moral, social or emotional development and personal safety is in danger, who are neglected or abused, or who are victims of crime (if FGC is a criminal offence under the Penal Code, then victims or potential victims of FGC would be able to apply to the courts for protection.)*

Article 4- (1) *For the purposes of this Law, in order to protect the rights of juveniles, the following fundamental principles shall be observed:*

- a) Safeguarding juveniles' right to life, development, protection and participation;*
- b) Safeguarding the interest and well-being of juveniles.*

Article 5- (1) *Protective and supportive measures are measures to be taken in terms of consulting, education, care, health and shelter, for the purpose of protecting the juvenile within his/her own family environment before all else. These measures are as follows:*

[...]

d) Health measure: is a measure to ensure necessary temporary or continuous medical care and rehabilitation for treatment and protection of the juvenile's physical and physiological health, and treatment and therapy for juveniles who use addictive substances

[...]

The law then goes on to set out the institutional processes for applying for protection of juveniles if they are in danger of being used or forced to take part in criminal offences.

Law to Protect Family and Prevent Violence Against Women (Law No 6284, 8/3/2012) (9)

This Law sets out the processes and institutions that have responsibility for protecting and preventing violence against women, and the penalties which will be applied to those who break injunctions or other mechanisms imposed on the perpetrator of the violence. While it

does not include any reference to the threat or occurrence of FGM/C, it may be applicable if the practice is regarded as a violation of a girl or woman's physical integrity, and offer some means of protecting them from undergoing FGM/C.

Article 1- (1) *The aim of this law is to protect the women, the children, the family members and the victims of stalking, who have been subject to the violence or at the risk of violence, and to regulate procedures and principles with regard to the measures of preventing the violence against those people.*

Procuring, Aiding and Abetting FGM/C

The **Penal Code** does not contain any reference to cover offences of procuring, inciting or assisting in the performance of FGM/C. However, if **Articles 85 (1) and 86 (1)** of the Penal Code, referred to above, were to be applied to FGM/C as a criminal offence, then there are other articles (37-40) in the Code at Part 4 (Jointly Committed Offences) which could be applied to these aspects:

Article 37 (Principal Involvement) (1): *Any person who jointly performs an act prescribed by law as an offence shall be culpable as the offender of that act.*

Article 38 (Incitement) (1): *A person who incites another to commit an offence shall be subject to the penalty appropriate to the offence that is committed.*

Article 39 (Assistance) (2): *A person remains culpable as an assistant if he: a) encourages the commission of an offence, or reinforces the decision to commit an offence, or promises that he will assist after the commission of an act. b) provides counsel as to how an offence is to be committed, or provides the means used for the commission of the offence. c) facilitates the execution of an offence by providing assistance before or after the commission of the offence.*

Article 40 (The Dependency Rule)

(1): *In order to constitute a jointly committed offence it is sufficient that the act is unlawful and committed intentionally. Each person participating in the commission of an offence shall be sentenced according to his unlawful act, irrespective of the individual circumstances of another which may prevent the imposition of a penalty.*

(2) *For specific offences, only the person possessing the proscribed qualifications required for such offence may be defined as the offender. Other persons who are involved in the commission of these offences shall remain culpable for incitement or assistance.*

(3) *In order to be culpable for a jointly committed offence, there must have been, at least, an attempt to commit the offence.*

There are no clauses in the Penal Code or in any other laws which explicitly cover use of premises for the purposes of FGM/C, unless they could be included in Articles 37-40 cited

above for assisting in the performance of FGM/C as a criminal offence (Article 86:1) that 'intentionally causes another person physical pain or who impairs another person's health [...].'

Failure to report

There is no explicit reference to failing to report FGM/C either before or after it takes place, to public authorities or others who may have the capacity to step in and prevent it taking place, or investigating and arresting someone who has performed and assisted with FGM/C on a girl or woman.

However, if FGM/C is understood to be a criminal offence under Article 86, then **Article 278 of the Penal Code** could apply, with an increased punishment if the victim is a child:

Article 278:

Any person who fails to report, to the relevant authority, an offence which is in progress shall be sentenced to a penalty of imprisonment for a term of up to one year.

Any person who fails to notify the relevant authority of any offence, which has been committed but where it is still possible to limit its consequences, shall be sentenced according to the provisions of the aforementioned paragraph.

Where the victim is a child (not having yet attained his fifteenth year) a person physically or mentally handicapped or a pregnant woman who cannot defend herself as a result of her pregnancy, the penalty to be imposed according to aforementioned paragraphs shall be increased by one half.

Medicalised FGM/C

There do not appear to be any laws or regulations in Turkey that prevent medical staff from participating in FGM/C. In Iran and Iraqi-Kurdistan FGM/C generally is carried out by traditional birth attendants and midwives. These practitioners include those licenced and trained by health authorities. Medicalised FGM/C is a growing challenge in Iran and Iraqi-Kurdistan but whether it occurs in Turkey is not known. However, what is a growing trend in Turkey is establishment of clinics for FGM Reconstruction Surgery (e.g. Female Genital Mutilation Reconstruction - iMed Medical).

Cross-Border FGM/C

The extent to which Turkish girls may be taken to another country for the purposes of FGM/C is not known; nor is it known if girls from Iran or Iraq are taken into Türkiye in order to be cut. Similarly, it is not known whether practitioners travel into Türkiye from Iran or Iraq in order to carry out FGM/C on girls living in Türkiye. However, it has been found that FGM/C is carried out in the bordering Kurdistan areas of Iran and Iraq, so this is a possibility.

There is no specific law criminalising cross-border FGM/C, but if the practice is held to be a criminal offence under the Penal Code, then **Article 11 of the Penal Code** could apply. This covers offences committed by or against Turkish citizens in a foreign country that would be punishable by a prison sentence of at least one year under the Turkish Penal Code, provided the individual has not already been convicted for the same offence overseas. This means that a Turkish citizen who carries out FGM/C on a Turkish girl living in another country could be prosecuted.

Under Article 12 (1) *Where a non-citizen commits an offence [...] to the detriment of Türkiye, in a foreign country, that would amount to an offence under Turkish law, and that offence is subject to a penalty of imprisonment where the minimum limit is greater than 1 year, and he is present in Türkiye, he shall be subject to penalty under Turkish law. Criminal proceedings shall only be brought upon request by the Minister of Justice. This means that if a practitioner from another country crossed the border into Türkiye and carried out FGM/C on Turkish girls they could be prosecuted under Turkish law.*

Penalties

If FGM/C is understood to be a criminal offence then penalties set out in the Turkish Penal Code (7) will apply:

Article 85(1) provides that where any person 'causes the death of another by reckless conduct', they will be punished by imprisonment of 2-6 years.

Article 86(1) states: 'any person who intentionally causes another person physical pain or who impairs another person's health...shall be sentenced to a penalty of imprisonment for a term of one to three years.'

Where the injury is 'minor' (not defined) and 'can be cured by a simple medical treatment' then the prison term will be reduced to 4 months to 1 year and/or a judicial fine (Article 86(2)).

Where the intentional injury is committed against a direct descendant, spouse or sibling, the penalty shall be increased by one half and shall not require a complaint. (Article 86(3)).

If the intentional injury results in 'the permanent impairment of the functioning of any one of the senses or organs of the victim', then the penalty shall be doubled (Article 87(1)).

If the intentional injury results in 'the loss of fertility', then the penalty shall be doubled.

Implementation of the law

No cases of FGM/C have been prosecuted in Türkiye, either under the Penal Code or any other law.

Role of the state

The Republic of Türkiye acceded to the **Convention on the Elimination of Discrimination Against Women (CEDAW)** in December 1985, but with reservation in respect of Article 29 (para 1) which sets out how disputes between State parties may be resolved.

No mention of FGM/C was made in CEDAW's Concluding Observations on Türkiye's 8th periodic review (July 2022) (10), though it did refer to the harmful practices of child marriage and bride prices which it recommended should be prohibited and criminalised. It also welcomed the adoption of Türkiye's Fourth National Action Plan to Combat Violence Against Women (2021–2025), and noted the reforms adopted by the State to strengthen the legal framework to combat violence against women and domestic violence with enactment of **Act No. 6284/2012**, discussed earlier as a possible legal framework for including the prevention of FGM/C and protecting potential girl-child victims.

However, **Türkiye's 4th National Action Plan (4th NAP) (2021-2025) on Combating Violence Against Women** referred to above in CEDAW's Concluding Observations of July 2022, was announced a year earlier, on 1 July 2021, the same day that Türkiye withdrew from **the Istanbul Convention** (11) which is generally accepted as the most comprehensive roadmap for combating violence, which had been in effect in Türkiye since 2014 (12) and cited as a reference 22 times in the previous NAP. CSOs have spoken out strongly against Türkiye's withdrawal from the Istanbul Convention, seeing it as a retrogressive step in combating violence against women and gender inequality.

In Turkey, 2% of women aged 20–24 were married before the age of 15, and 15% were married before the age of 18, representing 8 million women in total (13). Under the 2001 Turkish Civil Code, the minimum legal age of marriage is 18 for both men and women. However, they may be allowed to marry at 17 with parental consent or, in exceptional circumstances, a court may grant approval for marriage at age 16 (14).

According to Girls Not Brides (GNB), Syrian refugee girls in Turkey are particularly at risk of child marriage. The 2018 Demographic and Health Survey conducted among Syrian people in Turkey, found 45% of Syrian girls in Turkey were married before the age of 18, and 9% before the age of 15. However, GNB notes that available data may not reflect the full scale of the issue, both for Turkish nationals and Syrian refugees, as many child marriages are not registered and take place as unofficial religious ceremonies.

In 2015 the Turkish Constitutional Court announced that parties to a religious marriage and imams, as officiants, would no longer be penalised if the couple is not already married under civil law. This potentially exacerbates the already high prevalence of child marriage in Turkey, particularly in the Kurdish south-east (13).

While there is no direct link between early marriage of girls and performance of FGM/C, it is an indication of the overall legal standing of girls, and the cultural environment in which FGM/C occurs.

Türkiye ratified the **Convention on the Rights of the Child** on 4 April 1995, but with reservations pertaining to Articles 17, 29 and 30, all of which refer to the broad range of information, educational and learning materials that should be made available to children to promote their 'social, spiritual and moral well-being and physical and mental health;' 'enable development of their personality, talents and mental and physical abilities to their fullest potential', including respect for human rights and their own cultural identity, values and language, in preparation for responsible life in a free society that includes 'equality of sexes'.

In their Concluding Observations on Türkiye's 4th & 5th Combined Periodic Reviews (15), in June 2023, the Commission on the Rights of the Child made no reference to FGM/C but did highlight the need to address the issue of child and forced marriage among some refugee groups.

In April 2023, the UN's Human Rights Commission sent a Special Rapporteur to Türkiye to examine Violence against Women and Girls – it's Causes and Consequences (16). Her report made reference to the harmful practice of early marriage, but made no mention of FGM/C.

Türkiye has been a member of the Organisation of Islamic Co-operation since 1969. Türkiye did not sign the Cairo Declaration on the Elimination of FGM (in June 2003); it has not been signed by any of the Gulf States or Middle East countries as, then, it was seen as only relevant to African members of OIC. However, in February 2025, the OIC's Independent Permanent Human Rights Commission (IPHRC) issued a statement on behalf of its membership on the occasion of the 'International Day of Zero Tolerance for Female Genital Mutilation 2025', in which it made an emphatic call for an end to all forms of violence against women, including FGM/C in accordance with international human rights standards. This statement is reproduced at Annex 4 (17).

The **OIC IPHRC's statement** calls on member states to take 'urgent and coordinated action to eliminate FGM' by a) enacting and enforcing legislation to eliminate FGM/C and other harmful practices, b) implementing effective measures to protect women and girls from harmful practices and c) conducting widespread awareness and advocacy campaigns about the dangers of FGM/C and to dispel misconceptions regarding its religious basis.

Reference to ending harmful practices is also made in the **OIC's Plan of Action for the Advancement of Women (OPAAW)** which was adopted by OIC's Sixth Session of the Ministerial Conference on the Role of Women in the Development of OIC Member States held in Istanbul in November 2016 (18). The following statements reference this commitment:

Objective No 6: *Protection of Women from Violence: Combating all forms of gender-based violence, human trafficking and other harmful traditional practices against*

women and girls. Combating different forms of violence against women and girls including deprivation of opportunities and full enjoyment of their rights through preventive measures and provisions of rehabilitation to victims and punishment of perpetrators.

Section 6 (g): *Contributing to eradication of all harmful practices, in particular, female genital mutilation through strong political support and involvement of religious and community leaders.*

And in the matrices setting out the Mechanisms for Implementation:

Contributing to eradication of all harmful practices, in particular, female genital mutilation through strong political support and involvement of religious and community leaders (18 p.34).

Combating gender-based violence in all its manifestations, including domestic violence, human trafficking, fighting harmful traditional practices and violence against displaced women (18 p.9).

Integrate sexual and gender-based violence response, including child violence in all humanitarian policies and develop channels of communication to denounce these harmful practices and provide necessary assistance to victims (18 p.40).

Civil Society Observations

In June 2022, a group of Turkish civil society organisations (19) submitted a Shadow Report to CEDAW for the 8th Periodic Review. While this made no reference to FGM/C it did refer to the withdrawal of Türkiye from the Istanbul Convention ‘in utter disregard of women, women's organisations, Parliament and Constitutional provisions. The campaign against the Convention, backed by government, proceeded by targeting independent women's organisations [...] attacking Law no. 6284 on the Protection of the Family and the Prevention of Violence against Women (Law no.6284) and finally CEDAW and even the Lanzarote Convention’.

While the Constitution, Article 33, protects freedom of association, bureaucratic hurdles and limitations with regard to the range of permitted activities present challenges for civil society and NGOs (20). Although legislation does not explicitly limit the permitted purposes of CSOs, the Civil Code prohibits organisations from adopting aims that are ‘contradictory with law or morality’. Rights-based CSOs reportedly face greater government interference than other types of organisation (20). The EU Commission’s 2025 Report on Türkiye highlighted the difficult and increasingly restrictive environment in which CSOs operate. CSOs dealing with women’s rights were among the organisations that have continued to face growing pressure from the government (20).

Conclusions

There is no specific law criminalising FGM/C in Türkiye. However, certain provisions of the Turkish Penal Code (7) can be read as addressing and prohibiting FGM/C practices.

The Turkish Penal Code (Law No 5237, 2015) (7) includes several clauses which could be applied to FGM/C, ranging from intentionally causing pain to another to death resulting from FGM/C.

Article 85(1) provides that where any person 'causes the death of another by reckless conduct', they will be punished by imprisonment of 2-6 years.

Article 86(1) states: 'any person who intentionally causes another person physical pain or who impairs another person's health [...] shall be sentenced to a penalty of imprisonment for a term of one to three years'.

Penalties range from imprisonment for four months to a year, though this will be increased if the injury is committed against a 'direct descendant', or if the intentional injury results in 'permanent impairment of the functioning of any one of the senses or organs of the victim.' It could be argued that intentional and permanent damage to a girl's clitoris is impairment of the functioning of an organ.

If FGM/C is held to be a criminal offence under the above Articles of the Penal Code, then other aspects of the Penal Code can be applied:

- Procuring, Inciting, Assisting in the performance of FGM/C would be covered by Articles 37-40
- Failing to report a known past incident of FGM/C or a plan to perform FGM/C in the future would be covered by Article 278
- A Turkish citizen performing FGM/C on a girl in another country, or a non-citizen of Türkiye performing FGM/C on a Turkish girl in Türkiye (i.e. cross border) would be covered by Articles 11 and 12

However, to date no cases of FGM/C have been prosecuted under the Penal Code.

Child Protection Law No 5395 (2005) (8): Whilst most of this law relates to how young people should be treated within the justice system, it also sets out fundamental principles regarding protection of young people to safeguard their rights to health, which could be taken as applicable to protecting and preventing them undergoing FGM/C (Ref Articles 1, 3, 4, 5). Similarly, whilst the law to **Protect Family and Prevent Violence Against Women (Law No 6284, 8/3/2012)** (9) does not include any reference to the threat or occurrence of FGM/C, it may be applicable if the practice is regarded as a violation of a girl or woman's physical integrity, and offer some means of protecting them from undergoing FGM/C.

Recommendations

Research demonstrates that while important, legislation against FGM/C should be part of a holistic, multi-sectoral approach to effectively work toward elimination of the practice. Enforcement of the law without a holistic approach can lead to fear and pushing the practice underground.

The following recommendations, therefore, should be considered alongside holistic and multi-sectoral approaches to ending the practice.

1. Introduce a law that explicitly prohibits and criminalises FGM/C in Türkiye. This law should cover perpetrators; procuring aiding and abetting FGM/C; providing tools and premises for the purposes of FGM/C; and failure to report a planned or past incident of FGM/C. **OR:**

Amend Türkiye's Penal Code to define and make specific reference to FGM/C as a criminal offence.

Guidance on the features that should be included in a law against FGM/C are set out in Orchid Project's Model Law report, which is available [here](#).

2. Develop Ministry of Health guidelines on the dangers of FGM/C for all professional medical, health and welfare staff working in Türkiye's hospitals and clinics, including midwives, doctors and nurses, and forbid the practice from being undertaken in health facilities, with penalties for doing so that include their licence to practice medicine being withdrawn.
3. Put in place national policies and resources to provide widespread education on FGM/C and its harmful consequences to the health of women and girl
4. Strengthen border controls, particularly along the borders between Türkiye's Kurdistan region and neighbouring Kurdish communities in Iraq and Iran, to deter perpetrators from entering Türkiye with the intention of undertaking FGM/C, and to deter practitioners from exiting Türkiye with the intention of undertaking FGM/C in neighbouring countries.
5. Undertake a national statistical and disaggregated survey of Türkiye to reliably determine prevalence and features of the practice of FGM/C, including surveying those who have already undergone FGM/C or are at risk of undergoing FGM/C, and assessing the extent to which medicalisation of the practice is taking place.

Appendix 1: International and Regional Treaties

Treaty	Signed	Ratified	Acceded	Reservations on reporting?
Convention on the Elimination of All forms of Discrimination Against Women (1979) (CEDAW)			20 December 1985	‘With respect to article 29, paragraph 1 In pursuance of article 29, paragraph 2 of the Convention, the Government of the Republic of Türkiye declares that it does not consider itself bound by paragraph 1 of this article.’
Organisation of Islamic Co-operation (OIC) – Cairo Declaration on the Elimination of FGM/C (CDEFGM/C) (2003)	N/A	N/A	N/A	N/A
Convention on the Rights of the Child (1989) (CRC)	14 September 1990	4 April 1995		‘The Republic of Türkiye reserves the right to interpret and apply the provisions of articles 17, 29 and 30 of the United Nations Convention on the Rights of the Child according to the letter and the spirit of the Constitution of the Republic of Türkiye and those of the Treaty of Lausanne of 24 July 1923.’
Istanbul Convention				In 2021, Türkiye withdrew from the Istanbul Convention which

				requires governments to adopt legislation prosecuting domestic violence and similar abuse as well as marital rape and female genital mutilation.
--	--	--	--	--

'Signed': a treaty is signed by countries following negotiation and agreement of its contents.

'Ratified': once signed, most treaties and conventions must be ratified (i.e. approved through the standard national legislative procedure) to be legally effective in that country.

'Acceded': when a country ratifies a treaty that has already been negotiated by other states.

Annex 2: CEDAW General Recommendation No. 14: Female Circumcision

FGM/C – UN CEDAW Committee General Recommendation No. 14 UN CEDAW COMMITTEE General Recommendation No. 14 (ninth session, 1990) Female circumcision

The Committee on the Elimination of Discrimination against Women, Concerned about the continuation of the practice of female circumcision and other traditional practices harmful to the health of women,

Noting with satisfaction that Governments, where such practices exist, national women's organizations, non-governmental organizations, and bodies of the United Nations system, such as the World Health Organization and the United Nations Children's Fund, as well as the Commission on Human Rights and its Sub- Commission on Prevention of Discrimination and Protection of Minorities, remain seized of the issue having particularly recognized that such traditional practices as female circumcision have serious health and other consequences for women and children,

Taking note with interest the study of the Special Rapporteur on Traditional Practices Affecting the Health of Women and Children, and of the study of the Special Working Group on Traditional Practices,

Recognizing that women are taking important action themselves to identify and to combat practices that are prejudicial to the health and well-being of women and children,

Convinced that the important action that is being taken by women and by all interested groups needs to be supported and encouraged by Governments,

Noting with grave concern that there are continuing cultural, traditional and economic pressures which help to perpetuate harmful practices, such as female circumcision,

Recommends that States parties:

- Take appropriate and effective measures with a view to eradicating the practice of female circumcision. Such measures could include :
 - The collection and dissemination by universities, medical or nursing associations, national women's organizations or other bodies of basic data about such traditional practices;

- The support of women's organizations at the national and local levels working for the elimination of female circumcision and other practices harmful to women;
- The encouragement of politicians, professionals, religious and community leaders at all levels, including the media and the arts, to co-operate in influencing attitudes towards the eradication of female circumcision;

The introduction of appropriate educational and training programmes and seminars based on research findings about the problems arising from female circumcision;

- Include in their national health policies appropriate strategies aimed at eradicating female circumcision in public health care. Such strategies could include the special responsibility of health personnel, including traditional birth attendants, to explain the harmful effects of female circumcision;

Invite assistance, information and advice from the appropriate organizations of the United Nations system to support and assist efforts being deployed to eliminate harmful traditional practices;

- Include in their reports to the Committee under articles 10 and 12 of the Convention on the Elimination of All Forms of Discrimination against Women information about measures taken to eliminate female circumcision.

Annex 3: Role of the State (UN: CEDAW/C/GC/31/Rev.1CRC/C/GC/18/Rev.1)

In 2019 the Committee on the Elimination of Discrimination against Women and Committee on the Rights of the Child issued Joint General Recommendation No. 31 of the Committee on the Elimination of Discrimination against Women/General Comment, and No. 18 of the Committee on the Rights of the Child (2019), on harmful practices.

Available at: [g1913442.pdf](#) or [www.documents.un.org/doc/undoc/gen/g19/134/42/pdf/g1913442.pdf](#)

The objective of this Joint General Recommendation/General Comment is to clarify the obligations of States party to the Conventions by providing authoritative guidance on legislative, policy and other appropriate measures that must be taken to ensure full compliance with their obligations under the Conventions to eliminate harmful practices.

This Joint Recommendation/General Comment sets out a framework that States should follow in order to eliminate harmful practices. Of particular note are the recommendations as set out below:

Article 39. The Committees recommend that the States parties to the Conventions:

- (a) Accord priority to the regular collection, analysis, dissemination and use of quantitative and qualitative data on harmful practices disaggregated by sex, age, geographical location, socioeconomic status, education level and other key factors, and ensure that such activities are adequately resourced. Regular data collection systems should be established and/or maintained in the health-care and social services, education and judicial and law enforcement sectors on protection-related issues;
- (b) Collect data through the use of national demographic and indicator surveys and censuses, which may be supplemented by data from nationally representative household surveys. Qualitative research should be conducted through focus group discussions, in-depth key informant interviews with a wide variety of stakeholders, structured observations, social mapping and other appropriate methodologies.

Article 55. The Committees recommend that the States parties to the Conventions adopt or amend legislation with a view to effectively addressing and eliminating harmful practices. In doing so, they should ensure:

- (a) That the process of drafting legislation is fully inclusive and participatory. For that purpose, they should conduct targeted advocacy and awareness-raising and use social mobilization measures to generate broad public knowledge of and support for the drafting, adoption, dissemination and implementation of the legislation;
- (b) That the legislation is in full compliance with the relevant obligations outlined in the Convention on the Elimination of All Forms of Discrimination against Women and the Convention on the Rights of the Child and other international human rights standards that prohibit harmful practices and that it takes precedence over customary, traditional or religious laws that allow, condone or prescribe any harmful practice, especially in countries with plural legal systems;
- (c) That they repeal without further delay all legislation that condones, allows or leads to harmful practices, including traditional, customary or religious laws and any legislation that accepts the defence of honour as a defence or mitigating factor in the commission of crimes in the name of so-called honour;
- (d) That the legislation is consistent and comprehensive and provides detailed guidance on prevention, protection, support and follow-up services and assistance for victims, including towards their physical and psychological recovery and social reintegration, and is complemented by adequate civil and/or administrative legislative provisions;
- (e) That the legislation adequately addresses, including by providing the basis for the adoption of temporary special measures, the root causes of harmful practices, including discrimination on the basis of sex, gender, age and other intersecting factors, focuses on the human rights and needs of the victims and fully takes into account the best interests of children and women;
- (f) That a minimum legal age of marriage for girls and boys, with or without parental consent, is established at 18 years;
- (g) That a legal requirement of marriage registration is established and effective implementation is provided through awareness-raising, education and the existence of adequate infrastructure to make registration accessible to all persons within their jurisdiction;
- (h) That a national system of compulsory, accessible and free birth registration is established in order to effectively prevent harmful practices, including child marriage;
- (i) That national human rights institutions are mandated to consider individual complaints and petitions and carry out investigations, including those submitted on behalf of or directly by women and children, in a confidential, gender sensitive and child-friendly manner;

- (j) That it is made mandatory by law for professionals and institutions working for and with children and women to report actual incidents or the risk of such incidents if they have reasonable grounds to believe that a harmful practice has occurred or may occur. Mandatory reporting responsibilities should ensure the protection of the privacy and confidentiality of those who report;
- (k) That all initiatives to draft and amend criminal laws must be coupled with protection measures and services for victims and those who are at risk of being subjected to harmful practices;
- (l) That legislation establishes jurisdiction over offences of harmful practices that applies to nationals of the State party and habitual residents even when they are committed in a State in which they are not criminalized;
- (m) That legislation and policies relating to immigration and asylum recognize the risk of being subjected to harmful practices or being persecuted as a result of such practices as a ground for granting asylum. Consideration should also be given, on a case-by-case basis, to providing protection to a relative who may be accompanying the girl or woman;
- (n) That the legislation includes provisions on regular evaluation and monitoring, including in relation to implementation, enforcement and follow-up;
- (o) That women and children subjected to harmful practices have equal access to justice, including by addressing legal and practical barriers to initiating legal proceedings, such as the limitation period, and that the perpetrators and those who aid or condone such practices are held accountable;
- (p) That the legislation includes mandatory restraining or protection orders to safeguard those at risk of harmful practices and provides for their safety and measures to protect victims from retribution;
- (q) That victims of violations have equal access to legal remedies and appropriate reparations in practice.

Article 69. The Committees recommend that the States parties to the Conventions:

- (a) Provide universal, free and compulsory primary education that is girl friendly, including in remote and rural areas, consider making secondary education mandatory while also providing economic incentives for pregnant girls and adolescent mothers to complete secondary school and establish non-discriminatory return policies;
- (b) Provide girls and women with educational and economic opportunities in a safe and enabling environment where they can develop their self-esteem, awareness of their rights and communication, negotiation and problem-solving skills;

- (c) Include in the educational curriculum information on human rights, including those of women and children, gender equality and self-awareness and contribute to eliminating gender stereotypes and fostering an environment of non-discrimination;
- (d) Ensure that schools provide age-appropriate information on sexual and reproductive health and rights, including in relation to gender relations and responsible sexual behaviour, HIV prevention, nutrition and protection from violence and harmful practices; (
- e) Ensure access to non-formal education programmes for girls who have dropped out of regular schooling, or who have never enrolled and are illiterate, and monitor the quality of those programmes;
- (f) Engage men and boys in creating an enabling environment that supports the empowerment of women and girls.

Article 73: The Committees recommend that the States parties to the Conventions:

- (a) Provide all relevant front-line professionals with information on harmful practices and applicable human rights norms and standards and ensure that they are adequately trained to prevent, identify and respond to incidents of harmful practices, including mitigating negative effects for victims and helping them to gain access to remedies and appropriate services;
- (b) Provide training to individuals involved in alternative dispute resolution and traditional justice systems to appropriately apply key human rights principles, especially the best interests of the child and the participation of children in administrative and judicial proceedings;
- (c) Provide training to all law enforcement personnel, including the judiciary, on new and existing legislation prohibiting harmful practices and ensure that they are aware of the rights of women and children and of their role in prosecuting perpetrators and protecting victims of harmful practices;
- (d) Conduct specialized awareness and training programmes for health-care providers working with immigrant communities to address the unique health-care needs of children and women who have undergone female genital mutilation or other harmful practices and provide specialized training also for professionals within child welfare services and services focused on the rights of women and the education and police and justice sectors, politicians and media personnel working with migrant girls and women.

Article 81. The Committees recommend that the States parties to the Conventions:

- (a) Develop and adopt comprehensive awareness-raising programmes to challenge and change cultural and social attitudes, traditions and customs that underlie forms of behaviour that perpetuate harmful practices;
- (b) Ensure that awareness-raising programmes provide accurate information and clear and unified messages from trusted sources about the negative impact of harmful practices on women, children, in particular girls, their families and society at large. Such programmes should include social media, the Internet and community communication and dissemination tools;
- (c) Take all appropriate measures to ensure that stigma and discrimination are not perpetuated against the victims and/or practising immigrant or minority communities;
- (d) Ensure that awareness-raising programmes targeting State structures engage decision makers and all relevant programmatic staff and key professionals working within local and national government and government agencies;
- (e) Ensure that personnel of national human rights institutions are fully aware and sensitized to the human rights implications of harmful practices within the State party and that they receive support to promote the elimination of those practices;
- (f) Initiate public discussions to prevent and promote the elimination of harmful practices, by engaging all relevant stakeholders in the preparation and implementation of the measures, including local leaders, practitioners, grass-roots organizations and religious communities. The activities should affirm the positive cultural principles of a community that are consistent with human rights and include information on experiences of successful elimination by formerly practising communities with similar backgrounds;
- (g) Build or reinforce effective partnerships with the mainstream media to support the implementation of awareness-raising programmes and promote public discussions and encourage the creation and observance of self-regulatory mechanisms that respect the privacy of individuals.

Article 87. The Committees recommend that the States parties to the Conventions:

- (a) Ensure that protection services are mandated and adequately resourced to provide all necessary prevention and protection services to children and women who are, or are at high risk of becoming, victims of harmful practices; (
- b) Establish a free, 24-hour hotline that is staffed by trained counsellors, to enable victims to report instances when a harmful practice is likely to occur or has occurred, and provide referral to needed services and accurate information about harmful practices;

- (c) Develop and implement capacity-building programmes on their role in protection for judicial officers, including judges, lawyers, prosecutors and all relevant stakeholders, on legislation prohibiting discrimination and on applying laws in a gender-sensitive and age-sensitive manner in conformity with the Conventions;
- (d) Ensure that children participating in legal processes have access to appropriate child-sensitive services to safeguard their rights and safety and to limit the possible negative impacts of the proceedings. Protective action may include limiting the number of times that a victim is required to give a statement and not requiring that individual to face the perpetrator or perpetrators. Other steps may include appointing a guardian ad litem (especially where the perpetrator is a parent or legal guardian) and ensuring that child victims have access to adequate child sensitive information about the process and fully understand what to expect;
- (e) Ensure that migrant women and children have equal access to services, regardless of their legal status.

Annex 4: OIC statement dated 2 Feb 2025 (17)

OIC-IPHRC, on the occasion of the 'International Day of Zero Tolerance for Female Genital Mutilation 2025', made an emphatic call for an end to all forms of violence against women, including Female Genital Mutilation in accordance with the international human rights standards.

Jeddah, 6th February 2025: The Independent Permanent Human Rights Commission (IPHRC) of the Organization of Islamic Cooperation (OIC) joins the international community in commemorating the 'International Day of Zero Tolerance for Female Genital Mutilation (FGM) 2025' and strongly condemns all forms of violence against women and girls, including the harmful practice of Female Genital Mutilation (FGM). The Commission reaffirms that FGM is a deeply entrenched traditional practice with no religious justification and stands in clear violation of human rights.

The Commission emphasizes that Islam upholds the dignity and rights of women and categorically rejects practices that cause physical, psychological, or emotional harm. It is estimated that over 230 million girls and women worldwide have suffered the effects of FGM and that an estimated 27 million additional girls are at risk of undergoing FGM by 2030 unless action is accelerated¹. FGM violates several human rights outlined under the Universal Declaration of Human Rights, the Convention on the Elimination of all Forms of Discrimination against Women, and the Convention on the Rights of the Child. The practice of FGM is recognized internationally as a violation of the human rights of girls and women. It is mainly carried out on minors and is a violation of the rights of the girl child. The practice also violates a person's right to health, security, and physical integrity; the right to be free from torture and cruel, inhuman, or degrading treatment; and the right to life in instances when the procedure results in death.

The Commission acknowledges and appreciates efforts being taken by the Member States against this practice that endangers the physical and psychological health of women and girls. It was concluded at the Second Islamic Conference of Ministers in charge of Childhood held in Khartoum in 2009² that FGM is a violation of the human rights of girls and women. OIC has adopted 'The Cairo Declaration of the OIC on Human Rights, in which specific sections are included on 'Human Rights of Women,' which calls for the protection of women against all forms of discrimination, violence, abuse, and harmful traditional practices. Also, OIC welcomed the UN General Assembly resolution 67/146, entitled, 'Intensifying global efforts for the elimination of female genital mutilations' and resolution 67/144, entitled, 'Intensification of efforts to eliminate all forms of violence against women', both of which were adopted without a vote. Human Rights Council adopted resolution 44/16 on the

elimination of FGM to speed up efforts to reach zero tolerance for FGM by 2030 and to restate the global ban on the harmful practice as it constitutes a serious violation of women rights. Goal 5 of the 2030 Agenda for Sustainable Development calls for eliminating FGM. The International Islamic Fiqh Academy, in its Resolution No. 220 (4/23), categorically stated that female genital mutilation is prohibited in Islam. Accordingly, the OIC Plan of Action for the Advancement of Women (OPAAW) and its comprehensive implementation mechanism, while supporting international efforts, calls for the eradication of all harmful practices, in particular, FGM.

The Commission calls for collective efforts to empower women and girls through education, healthcare, and legal protection. It calls upon governments, civil society organizations, and the media to take urgent and coordinated action to eliminate FGM. Human rights-based approaches to eradication include, but are not limited to, the enforcement of laws, education programs focused on empowerment, and campaigns to recruit change agents from within communities. Accordingly, the Commission urges governments to: (a) enact and enforce legislation to eliminate FGM and other harmful practices; (b) implement effective administrative measures to protect women and girls from harmful practices and violence and ensure accountability; (c) conduct widespread awareness and advocacy campaigns to educate the public on the dangers of FGM and dispel misconceptions regarding its religious basis. In this regard, the Commission, while respecting cultural sensitivities and national laws, affirmed its readiness to work together with all relevant OIC institutions and Member States to bring an end to all forms of violence, bias, and discrimination against women.

References

1. Worldometer [Internet]. [cited 2026 Feb 25]. Maps of Turkey. Available from: <https://www.worldometers.info/maps/turkey-maps/>
2. Countrymeters. Turkey population (2026) live [Internet]. [cited 2026 Feb 25]. Available from: <https://countrymeters.info/en/Turkey>
3. GOV.UK [Internet]. 2025 [cited 2026 Feb 25]. Country policy and information note: Kurds, Turkey, July 2025 (accessible). Available from: <https://www.gov.uk/government/publications/turkey-country-policy-and-information-notes/country-policy-and-information-note-kurds-turkey-october-2023-accessible>
4. World Health Organization. World Health Organization [Internet]. 2025 [cited 2026 Feb 1]. Female Genital Mutilation. Available from: <https://www.who.int/news-room/fact-sheets/detail/female-genital-mutilation>
5. Ahmed HH, Bilici N, Cengiz M, Altuner Y, Ertekin R, Ayhancı A. A scientific approach to the health and obstetrical problems of female genital mutilation of Somali women living in Turkey. *Biol Divers Conserv*. 2025 Apr 15;18(1):41–52. doi:10.46309/biodicon.2025.1401447
6. Department of Laws and Resolutions. Constitution of the Republic of Türkiye & Rules of Procedure of the Grand National Assembly of Türkiye [Internet]. Ankara: Grand National Assembly of Türkiye; 2019 May [cited 2026 Feb 25]. Available from: <https://cdn.tbmm.gov.tr/TbmmWeb/Yayinlar/Dosya/ea266075-d26a-4bad-8007-efa2b7b773a8.pdf>
7. European Commission for Democracy through Law (Venice Commission). Penal Code of Turkey [Internet]. Strasbourg: Council of Europe; 2016 Feb [cited 2026 Feb 25]. Report CDL-REF(2016)011. Available from: [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-REF\(2016\)011-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-REF(2016)011-e)
8. Child Protection Law [Internet]. Official Gazette, 15 July 2005, No. 25876. 2005 Jul 3. Available from: <https://kidsempowerment.org/wp-content/uploads/2022/07/child-protection-law.pdf>
9. 6284 Law to Protect Family and Prevent Violence against Woman [Internet]. 2012 Mar 8. Available from: <http://www.lawsturkey.com/law/law-to-protect-family-and-prevent-violence-against-woman-6284>
10. Committee on the Elimination of Discrimination against Women. CEDAW/C/TUR/CO/8: Concluding observations on the eighth periodic report of Türkiye [Internet]. United Nations; 2022 Jul [cited 2026 Feb 25]. Report CEDAW/C/TUR/CO/8. Available from: <https://www.ohchr.org/en/documents/concluding-observations/cedawcturco8-concluding-observations-eighth-periodic-report>
11. Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence [Internet]. 2011 May 11. Available from: <https://www.coe.int/en/web/istanbul-convention/text-of-the-convention>
12. Council of Europe. Treaty Office [Internet]. [cited 2026 Feb 25]. Chart of Signatures and Ratifications – CETS No. 210. Available from: <https://www.coe.int/en/web/conventions/full-list?module=signatures-by-treaty&treaty=210>

13. United Nations Children's Fund. Child Marriage Data Portal [Internet]. UNICEF; [cited 2026 May 13]. Child Marriage in Türkiye. Available from: <https://childmarriagedata.org/country-profiles/turkiye/>
14. Freddie Nickolds, Maud Ballez. ECPAT Country Overview: Turkey [Country Overview] [Internet]. Bangkok: ECPAT International; [cited 2026 May 13]. Available from: <https://ecpat.org/wp-content/uploads/2021/05/ECPAT-Country-Overview-Report-Sexual-Exploitation-of-Children-inTurkey-July-2020-ENGLISH.pdf>
15. Committee on the Rights of the Child. Concluding Observations on the combined Fourth and Fifth periodic reports of Türkiye [Internet]. Office of the High Commissioner for Human Rights; 2023 Jun [cited 2026 Feb 26]. Report CRC/C/TUR/CO/4-5. Available from: <https://www.ohchr.org/en/documents/concluding-observations/crccturco4-5-concluding-observations-combined-fourth-and-fifth>
16. United Nations, Office of the High Commissioner for Human Rights. Report of the Special Rapporteur on violence against women and girls on the visit to Türkiye [Internet]. United Nations; 2023 Apr [cited 2026 Feb 25]. Report A/HRC/53/36/Add.1. Available from: <https://www.ohchr.org/en/documents/country-reports/ahrc5336add1-visit-turkiye-report-special-rapporteur-violence-against>
17. Independent Permanent Human Rights Commission (IPHRC), Organization of Islamic Cooperation. IPHRC press statement on female genital mutilation (FGM) (International Day of Zero Tolerance for Female Genital Mutilation 2025 [Internet]. Jeddah: OIC-IPHRC; 2025 Feb [cited 2026 Jan 19]. Available from: https://oic-iphrc.org/2025/1/2114523-06022025IPHRC_Press_Statement_on_FGM_2025_EV.pdf
18. Organization of Islamic Cooperation. OIC Plan of Action for the Advancement of Women (OPAAW) [Plan of Action] [Internet]. Istanbul, Turkey: Organization of Islamic Cooperation; 2016 Nov [cited 2026 Jan 25]. Available from: https://oic-iphrc.org/docs/en/legal_instruments/OIC_HRRIT/38864.pdf
19. Women for Women's Human Rights – New Ways. CSO Shadow Report for 8th Periodic Review of Turkey [Internet]. 2022 Feb [cited 2026 Feb 25]. Available from: <https://wwhr.org/wp-content/uploads/2022/02/CSO-Shadow-Report-for-8th-Periotic-Review-of-Turkey.1.pdf>
20. International Center for Not-for-Profit Law [Internet]. 2026 [cited 2026 May 13]. Türkiye Civic Freedom Monitor. Available from: <https://www.icnl.org/resources/civic-freedom-monitor/turkiye>

Disclaimer

This report analyses and discusses the application of national (criminal) laws to the commission of FGM/C and any possible related crimes. It also explores other legal factors deemed relevant, such as legal obligations to report the commission or likely upcoming commission of FGM/C, available legal protective measures for girls and women at risk of FGM/C, and any obligations of national governments in relation to FGM/C.

The initial research conducted for this report consisted of a questionnaire prepared by Hogan Lovells International LLP with input from certain local law firms, local non-governmental organisations and/or other information providers (together, the Information Providers). The information contained in the responses to that questionnaire was then reviewed by Orchid Project, updated and used as the basis of further research from relevant sources.

The underlying information for this report was gathered by the Information Providers through desk-based research and is provided for general information purposes only. Nothing contained in this report is intended to provide legal or other professional advice, and specific legal advice should be obtained in relation to any specific situation.

It should be noted that in many countries there is a lack of legal precedent for the penalties laid out in the law, meaning that, in practice, lesser penalties may be applied. The information contained in the report is provided as at the date of this report or as otherwise noted in the report. Neither the Information Providers nor Orchid Project are under any obligation to update this report subsequent to its date.

Hyperlinks to websites operated by others in this report are provided for reader convenience only. The Information Providers do not endorse nor are they responsible for the contents of websites operated by others that are accessible from this report.

Neither the Information Providers nor Orchid Project:

- accepts any responsibility or liability for any loss which may arise from reliance on information contained in this report, or any inaccuracies, including changes in the law since the research was completed in October 2025;
- is responsible or liable for any matter relating to any third parties accessing or using the report or its contents; or
- endorses or is responsible for any revision, amendment or addition to the report made by a third party without the consent of all the Information Providers.

ORCHID PROJECT

wadi

*This publication is licensed under a **CC BY-NC 4.0** licence. Extracts from it may be freely reproduced, provided that due acknowledgement is given to the source and Orchid Project.*

Orchid Project seeks updates on the data and invites comments on the content and suggestions as to how this report can be improved. For more information, please contact Orchid Project at research@orchidproject.org.

© Orchid Project 2026

This work is licensed under a CC BY-NC 4.0 licence

research@orchidproject.org