



THE PERSECUTION OF CHRISTIANS IN TURKEY



EUROPEAN CENTRE



FOR LAW & JUSTICE

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Turkey, once the cradle of Christianity and home to Apostolic Churches, has witnessed a century-long eradication of its Christian population: from around 20% in 1915 to less than 0.3% today. This decline stems from genocides, pogroms, and systematic state policies aimed at creating an ethnically and religiously homogeneous Turkish Sunni Muslim nation. The 257,000 remaining Christians (Armenian, Greek Orthodox, Syriac, Catholic, and Protestant) continue to face legal, institutional, and social hostility.

This report addresses the many issues Christians currently face:

- Hate speech against them
- Interferences of the State in the organisation of their communities
- Prevention of opening churches and seminars
- Systematic Targeting of foreign clergy and pastors

The ECLJ calls on Turkey to respect and protect its Christian citizens and residents, to uphold its obligations under the Treaty of Lausanne, the European Convention on Human Rights, and the International Covenant on Civil and Political Rights, and to guarantee genuine freedom of religion and belief for all.



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The **European Centre for Law and Justice (ECLJ)** is an international non-governmental organization dedicated to the promotion and protection of human rights in Europe and worldwide. Since 2007, the ECLJ has held special consultative status with the United Nations Economic and Social Council (ECOSOC).

The ECLJ addresses legal, legislative, and cultural issues through effective strategies of advocacy, education, and litigation. It is particularly committed to upholding natural freedoms, human dignity, and sovereignty before the European Court of Human Rights (ECtHR) and within the mechanisms established by the United Nations, the Council of Europe, the European Parliament, the Organization for Security and Co-operation in Europe (OSCE), and other institutions. The ECLJ regularly intervenes before the ECtHR in numerous cases as a third party, and also supports applicants or governments.

The ECLJ grounds its action on “the spiritual and moral values which are the common heritage of the European peoples and the true source of individual freedom, political liberty and the rule of law, principles which form the basis of all genuine democracy” (Preamble to the Statute of the Council of Europe).

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SUMMARY

As the Christians living in Turkey are not free to expose the persecution they endure, it is the duty of the ECLJ to do it.

Turkey, once the cradle of Christianity and home to Apostolic Churches, has witnessed a century-long eradication of its Christian population: from around 20% in 1915 to less than 0.3% today. This decline stems from genocides, pogroms, and systematic State policies aimed at creating an ethnically and religiously homogeneous Turkish Sunni Muslim nation. The 257,000 remaining Christians (Armenian, Greek Orthodox, Syriac, Catholic, and Protestant) continue to face legal, institutional, and social hostility.

1. **Direct violence against Christians remains a reality in Turkey**, marked by armed attacks, targeted assaults, and explicit threats. The January 2024 attack at Santa Maria Church, the repeated assaults on the Çekmeköy Protestant Church, and the killing of members of the Syriac community illustrate a worrying climate of insecurity. Pastors have been physically attacked in their places of worship, while hostile graffiti regularly targets churches. These incidents are rarely acknowledged as hate crimes, reinforcing the Christian communities' sense of vulnerability.
2. **Hate speech** against Christians remains widespread in the media and public discourse, while religious education in schools promotes a vision of Turkish identity inseparable from Islam. Christians from a Muslim background are particularly exposed to violence within their own families. The Armenian genocide, recognized by the European Parliament, France, and the United States, continues to be officially denied by the Turkish authorities.
3. The authorities interfere in both the Greek Orthodox and Armenian **patriarchal elections**, while refusing to grant **legal personality** to any Churches or patriarchates, including the Catholic Church, and specifically monitoring Protestant communities and foreign Christians.
4. **Christian community foundations** are deprived of the right to freely hold elections for their boards of directors. Thousands of their properties have been expropriated; many have been placed under State trusteeship ("*mazbut*") or nationalized, even though they manage churches, hospitals, and schools providing essential public services under a system inherited from the Ottoman Empire. The ECLJ regularly intervenes in such cases before the European Court of Human Rights.
5. Regardless of denomination, the **formation of clergy** remains extremely difficult: the Halki Seminary for the Greek Orthodox has been closed since 1971, while Protestant communities suffer from the expulsion of foreign pastors and the lack of officially recognized places of worship.
6. **Foreign Christians**—pastors, missionaries, or Christian converts—are particularly targeted under vague "national security" pretexts. Since 2016, hundreds have been deported or banned from reentry through administrative codes such as G-87 and N-82, often without evidence or trial. Cases such as Andrew Brunson, Kenneth Wiest, and Amanda Jolyn Krause illustrate this ongoing persecution. Even Christian refugees from Iran or Afghanistan face deportation in violation of the principle of non-refoulement. The ECLJ has documented these violations and intervened in multiple cases, notably *Wiest v. Turkey*, to challenge the structural discrimination suffered by Christians.

The ECLJ calls on Turkey to respect and protect its Christian citizens and residents, to uphold its obligations under the Treaty of Lausanne, the European Convention on Human Rights, and the International Covenant on Civil and Political Rights, and to guarantee genuine freedom of religion and belief for all.



The Virgin and Child (Theotokos) mosaic, located in the apse of the former basilica Hagia Sophia (Istanbul, Turkey), dating from 867, stands beside a large panel bearing the word “Allah”, installed in 1859. (Source: [guias-viajar](https://www.guias-viajar.com))

Originally built as a Christian Basilica in the 4th century, Hagia Sophia was reconstructed on a grander scale in the 6th century under the Byzantine Emperor Justinian. After the Ottoman conquest of Constantinople in 1453, it was converted into a mosque by Sultan Mehmed II. In 1934, Mustafa Kemal Atatürk transformed it into a museum, until its reconversion into a mosque in 2020.

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Map of Turkey (source: maps.lib.utexas.edu)

1. Introduction

The Republic of Türkiye (hereinafter Turkey) occupies a land that was once one of the historical heartlands of Christianity and has long been home to diverse ethnicities and faiths. Known in the Bible as “Asia Minor,” the region played a foundational role in the early Christian tradition: it was the site of many of the Apostle Paul’s missionary journeys, the birthplace of several early Christian communities, and the location of key ecumenical councils (including the First Council of Nicaea) that helped define the Catholic faith. It is also believed to be the place where Mary, the mother of Jesus, ended her earthly life.¹ Over the past century, the Christian presence in Turkey has dramatically declined, primarily as a result of State-sponsored marginalization and repression, which have led to a severe demographic collapse.

2025 marks the 1,700th anniversary of the First Council of Nicaea. Pope Leon XIV has expressed a desire to visit Turkey for this occasion (27-30 November). Such a visit would be a historic opportunity not only to honor the Christian heritage rooted in Turkish soil but also to address the difficult present. Will he offer a word of truth and encouragement to the Christian communities who remain, often in silence and under pressure?

This report offers a comprehensive analysis of the status of Christians in Turkey today. It presents the historical evolution of relations between the churches and the State, outlines the current legal framework concerning religious freedom, and identifies the tools of repression used against Christians, ranging from discriminatory education policies and limitations on property rights to the use of surveillance and administrative harassment. The report also highlights how different Christian denominations, including Greek Orthodox, Armenian Apostolic, Syriac Orthodox, Chaldean, Catholic, Protestant and Evangelical churches, face forms of pressure.

2. Who are the Christians of Turkey? From Apostolic Roots to a Marginalized Minority

Christians belong to some of the oldest religious communities in Turkey. Their liturgies, churches, languages, and cultural traditions bear witness to a continuous Christian presence on Anatolian soil for centuries. At the beginning of the 20th century, Christians still made up around 20% of the country’s population. Today, however, they represent just 0.3% — approximately 257,000 Christians according to the NGO Open Doors.² The U.S. Department of State provides approximate figures for each denomination.³

The main groups today are:

Armenian Apostolic Christians, historically centered in Eastern Anatolia, once ruled the region through successive dynasties throughout antiquity and the Middle Ages.⁴ Although their political leadership declined with the arrival of Turkic-speaking peoples in the 11th century and during the Ottoman period, the Armenian people preserved a strong sense of communal and religious identity. At the beginning of the 20th century, there were approximately 2.5 million Armenians living in the Ottoman Empire.⁵ Today, however, only about 90,000 Armenian Apostolic Christians remain in Turkey, including migrants from Armenia.

¹ *Persecution.org*, “[The Christians Disappearing from Biblical Lands](#),” 9 January 2025.

² *Open Doors International*, *Turkey: Persecution Dynamics, 2025 Full Report*.

³ *U.S. International Religious Freedom 2023 Turkey Report*.

⁴ *Britannica*, “[Armenian Genocide](#),” 10 October 2025.

⁵ *The Holocaust Encyclopedia*, “[The Armenian Genocide \(1915-16\): Overview](#).”

Greek Orthodox Christians have maintained a presence in what is now Istanbul since the 7th century B.C., when Greek settlers founded the city of Byzantium. Their historical and spiritual center later became Constantinople, the seat of Eastern Christianity until its fall to the Ottomans in 1453. This conquest marked the beginning of five centuries of Ottoman rule over the Greek population, during which the Orthodox Church retained some autonomy under the millet system. Although the Greek War of Independence in 1821 led to the creation of a separate Greek State, approximately 2 million Orthodox Greeks continued to live within Ottoman territory.⁶ Today, however, only around 2,500 Greek Orthodox Christians remain in Turkey—mostly elderly, and concentrated in Istanbul.

Syriac and Assyrian Christians, whose liturgy is conducted in Aramaic—the ancient language spoken by Jesus—represent some of the most ancient Christian communities in the region.⁷ The Syriac Orthodox Church, which split from Byzantine Christianity in the 5th century, has maintained a continuous presence in southeastern Turkey for over 1,500 years, rooted in a strong monastic and theological tradition. Before the massacres of 1915, the Assyrian population in the region numbered around 600,000. Today, only an estimated 25,000 Syriac and Assyrian Christians remain in Turkey, concentrated mainly around the historic region of Tur Abdin.

Chaldean Christians, a smaller group of Eastern-rite Catholics, are estimated at fewer than 3,000 members, mostly in the southeast, and **Armenian Catholics** between 2,000 and 3,500.

In addition, around 200,000 **Eastern Orthodox Christians** (mainly Ukrainian and Russian nationals) reside temporarily in Turkey as refugees or expatriates, though they are not part of the native Christian population, and 25,000 **Roman Catholics** (including migrants from various African countries and the Philippines).

Protestant and Evangelical Christians form one of the more recent additions to Turkey's denominational landscape, with their presence dating back to the 19th century through missionary activity.⁸ Initially, the Protestant movement primarily reached non-Muslim minorities, but beginning in the 1960s, it saw a modest but steady increase in conversions from Muslim backgrounds. The Protestant community has long consisted of both Turkish citizens and foreign residents, although the latter are increasingly subject to expulsion. Today, there are approximately 10,000 Turkish Protestant Christians.⁹ Despite being legally unrecognized as a minority and lacking institutional protections, Protestant churches remain active across the country, particularly in urban centers, often relying on informal structures to maintain their worship and community life.

Today, Christians make up less than 0.3% of Turkey's 86.3 million inhabitants in a country where approximately 88% identify as Sunni Muslim, 6% as non-believers, 4% as Alevi, and 2% as other groups, including between 12,000 and 16,000 Jews. Christian communities are small, dispersed, and concentrated mainly in Istanbul, Izmir, and parts of the southeast such as Mardin and Diyarbakır, with smaller yet historically significant groups in Hatay (Antioch). Most lack full legal recognition, and many operate churches or community activities under constant uncertainty. Their minority status is not only numerical but also legal, political, and cultural. The following section outlines how this marginalization was engineered.

⁶ *World Without Genocide*, "[The Ottoman Christian Genocide](#)," 2021.

⁷ *The Other Tour*, "[The Syriac Orthodox Community in Turkey: A Vanishing Heritage?](#)," 2025.

⁸ *Minority Rights Group International*, "[World Directory of Minorities and Indigenous Peoples - Turkey: Reformist Christians](#)," 2008.

⁹ *Reformatörish Dagblad*, "[A police officer came up with the name for the fast-growing Turkish Protestantism](#)," 28 September 2024.

3. How Christians Disappeared from Turkey: State Violence and Legal Strategy

The dramatic demographic collapse of Turkey's Christian population over the past century is the result of a deliberate, multilayered policy of elimination—carried out through violence, forced displacement, legal exclusion, and institutional repression. Yet in reality, this outcome is the culmination of a long and tragically logical sequence that did not begin with World War I or with the founding of the Republic of Turkey.

The territory corresponding to modern-day Turkey formed part of the Eastern Roman (Byzantine) Empire, whose population—Greeks, Armenians, Syriacs, Georgians, and others—had been deeply Christian since the 4th century. Nomadic Turkic Muslim populations began settling in Anatolia as early as the 11th century, following the Battle of Manzikert (1071).

Between 1071 and 1453, the Seljuk Turks and then the various Turkish beyliks gradually conquered most of Anatolia, provoking a progressive decline of the Christian population through displacement, conversion, and the settlement of new Muslim populations. When the Ottomans captured Constantinople in 1453, the city remained entirely Byzantine—overwhelmingly Greek and Christian—with small Jewish and Genoese communities.

In 1860, Druze militias and local factions massacred more than 15,000 Greek Orthodox, Melkite, and Maronite Christians in Mount Lebanon and Damascus. But the true State-directed policy of destruction targeting Ottoman Christians unfolded over three decades (1894–1924) and continued, in different forms, into the 1950s and 1960s.

The eradication of Christians in Turkey began in the late Ottoman period with the Hamidian Massacres (1894–1896), which killed an estimated 250,000 Armenians under Sultan Abdülhamid II, followed by the Adana massacre (1909). In 1913, the Committee of Union and Progress (CUP) launched the first phase of the extermination campaign against Greeks in Eastern Thrace and along the Aegean coast, marked by deportations, raids, sexual violence, and forced labor.

3.1. From Religious Eradication to a “Secular” Turkish-Muslim Republic (1894–1964)

During World War I, as the Ottoman Empire collapsed, several ethnic and religious groups sought greater autonomy and basic rights. At the same time, the nationalist Young Turk leadership—driven by an ethno-religious vision of a homogeneous Muslim Turkish nation—launched a coordinated campaign to eliminate the empire's non-Muslim populations.

This project unfolded through mass deportations to remote desert regions, forced marches, and systematic starvation. Its purpose was not merely physical destruction but demographic transformation: once Christian communities were expelled or annihilated, their lands were resettled with Muslim populations considered more compatible with the emerging national identity.

The campaign reached its brutal climax with the Armenian and Assyrian-Chaldean Genocides of 1915 (Seyfo), resulting in the death or displacement of more than two million Christians, followed by the massacres of Pontic Greeks from 1919. These atrocities unfolded largely unnoticed by an international community preoccupied with World War I. Through successive waves of violence, the Christian presence in Anatolia was reduced to a fraction of its historical scale.

The collapse of the Ottoman Empire and the creation of the Turkish Republic in 1923 further entrenched this project of religious and cultural homogenization:

- 1922 – The Great Fire of Smyrna/Izmir, in which approximately 100,000 Greeks and Armenians were killed.
- 1923 – The Greco-Turkish population exchange, formalized by the Treaty of Lausanne, forcibly transferred more than one million Greek Orthodox Christians out of Anatolia—legitimizing, after the fact, a demographic transformation already achieved largely through violence.
- 1924–1925 – Additional unilateral deportations, targeting the remaining Armenians, the surviving Assyrians (Syriacs, Chaldeans, Nestorians), and Greeks not included in the population exchange.
- 1955 – The Istanbul pogrom of 6–7 September, triggered by a fabricated bombing claim, unleashed large-scale violence against the remaining Greek Orthodox community: dozens of churches were destroyed, thousands of shops were looted, and many residents fled or were forced out.
- 1964 – Mass expulsions of Greeks, as the government unilaterally revoked a bilateral agreement with Greece. Around 12,000 Greek nationals—many born and raised in Istanbul—were expelled; their properties were confiscated, and Greek schools and institutions were shut down or severely restricted.

These waves of violence were not isolated episodes but components of a long-term national strategy. From the genocides of 1915 to the expulsions of the 1960s, Christians in Turkey were systematically removed, dispossessed, or rendered voiceless—not by accident, but through a sustained State project of religious and cultural erasure.



The Istanbul pogrom of 6–7 September 1955, directed primarily against the city's Greek minority, erupted after news broke of a bomb explosion the previous day at the Turkish consulate in Thessaloniki, the birthplace of Mustafa Kemal Atatürk. The investigation quickly revealed that the attack had been carried out by a Turk as part of a staged false-flag operation. However, the Turkish press did not inform the public of this conclusion. Some 300,000 enraged rioters—most of them brought into the city in advance by truck—then descended on Beyoğlu (Pera), Istanbul's Greek district, for nine hours of destruction and looting. The pogrom dramatically accelerated the exodus of Greeks from Istanbul. (Source: [Internationaliststandpoint](#))

3.2. Secularism in Theory, Islam in Practice

After the collapse of the Ottoman Empire and the dismantling of its multi-religious fabric, the new Turkish leadership sought to redefine national identity. The fall of the Empire not only ended a dynasty but also swept away the system of religious pluralism that had characterized Ottoman society, where Christians, Jews, and Muslims had long coexisted under the unequal yet formally recognized millet system. The nationalist movement that arose from this rupture did not aim to preserve that diversity. Instead, it sought to replace the Ottoman order with a modern, centralized nation-state rooted in Turkish ethnicity and Sunni Islam.

At the founding of the Republic in 1923, Turkish nationalist leaders—the political heirs of the Young Turks—envisioned a new kind of State. Their ambition was not to build a pluralistic or genuinely secular republic, but a culturally and religiously uniform nation bound by a single language, a single ethnic identity, and a single faith. They viewed the minority-rights provisions of the Treaty of Lausanne with distrust and resisted international efforts to secure equal treatment for non-Muslim communities. The resulting compromise allowed Turkey to formally pledge protection of minorities while, in practice, implementing policies that marginalized, excluded, and gradually erased them from public life.

The Turkish Constitution proclaims in Article 2 that the Republic is “democratic, secular, and social,” and guarantees under Article 24 the freedom of conscience, religion, and belief. In principle, these provisions should ensure state neutrality toward all faiths.

In reality, however, the Turkish system maintains deep institutional favoritism toward Sunni Islam. Article 136 establishes the Presidency of Religious Affairs (*Diyanet İşleri Başkanlığı*), responsible for organizing and financing Sunni Muslim worship. This vast institution—fully embedded within the public administration—manages more than 85,000 mosques in Turkey and more than 2,000 mosques abroad, trains imams, drafts weekly sermons, and receives a budget larger than several ministries.

Rather than producing a neutral public sphere, this arrangement has resulted in a structure where the Diyanet functions as the religious arm of the State, and Sunni Islam enjoys systematic advantages over all other denominations—especially Alevis, and even more so Christians and Jews, who receive neither public funding nor meaningful protection for their religious freedom. The gap between constitutional secularism and administrative practice reveals the structural ambiguity of the Turkish Republic: a State that calls itself secular while actively sustaining the dominance of a single religion.

Far from marking a clean break with the Ottoman past, this system institutionalized the very ideology that animated the Young Turks: a vision of national unity achieved through religious conformity. The modern Turkish State replaced the Caliphate with a bureaucratic apparatus of Islam, ensuring that the Republic would remain, in substance, a Sunni Muslim polity operating under the language of secularism.

3.3. The Post-2016 Coup Paranoia Against Foreign Christians

The failed coup d’État of 15 July 2016 is one of the most consequential events shaping the treatment of religious minorities in contemporary Turkey. In a matter of hours, a faction within the Turkish Armed Forces attempted to seize control of key institutions in Ankara and Istanbul, including bridges, airports, and media buildings. The attempt collapsed quickly after President Erdoğan issued a nationwide call to resist, prompting mass civilian mobilization. The confrontation left at least 290 people dead and more than 1,500 injured.

The Turkish government immediately attributed the coup to followers of Islamic cleric Fethullah Gülen, who had been living in self-imposed exile in the United States since 1999.¹⁰ Once an ally of Erdoğan's ruling AKP, Gülen led the *Hizmet* ("service") movement—a broad network of schools, charities, and civil society actors advancing Islamic-inspired social engagement.¹¹ Turkish authorities accused him of infiltrating State institutions and orchestrating the coup through his sympathizers, although Gülen has consistently denied any involvement.

In response, President Erdoğan launched a sweeping purge across public institutions. Within 48 hours, more than 6,000 people had been arrested; in the following weeks, tens of thousands of civil servants, judges, teachers, journalists, and soldiers were suspended, dismissed, or imprisoned.¹² Although Christians played no role in the coup, the climate of nationalist suspicion cast them as potential subversives, and they became collateral victims of the post-coup repression and of the authoritarian shift it accelerated. Several acts of vandalism and intimidation targeted Christian places of worship—particularly in Malatya—with local authorities often displaying indifference or passivity.¹³

American Protestants were especially targeted, partly in retaliation for Washington's refusal to extradite Fethullah Gülen.¹⁴ Pastor Ryan Keating, designated a national-security threat, was forced to sign a document acknowledging that he was permanently banned from Turkey—a country where he had lived for 23 years and where his wife and children remained.¹⁵

The most emblematic case is that of Pastor Andrew Brunson, who had lived in İzmir for more than two decades when he was arrested in October 2016 and accused of espionage and involvement in the coup. His detention, widely covered by the media, fueled a government-driven narrative portraying Protestant missionaries as agents of American influence and participants in a "Western conspiracy." This association between Christian identity, foreign allegiance, and political subversion profoundly damaged public perceptions of evangelical churches in Turkey.



In 2018, the United States imposed economic sanctions and visa restrictions on Turkish ministers, causing the lira to plunge.¹⁶ The Trump administration elevated Brunson's case into a symbol of religious-freedom advocacy, with direct intervention from both President Trump and Vice President Pence, supported by the American Center for Law and Justice and the

American pastor Andrew Craig Brunson released in October 2018 after two years of detention. (source: Wikipedia)

¹⁰ BBC, "[Turkey coup: Who was behind Turkey coup attempt?](#)," 16 July 2016.

¹¹ BBC, "[Profile: Fethullah Gulen's Hizmet movement](#)," 18 December 2013.

¹² BBC, "[Turkey's coup attempt: What you need to know](#)," 17 July 2016.

¹³ *Terre Sainte Magazine*, « [L'addition salée du coup d'état turc](#) », 21 July 2016.

¹⁴ *Religion News Service*, "[Turkey post-coup crackdown also targets US Protestants](#)," 4 December 2016.

¹⁵ *Religion News Service*, "[Turkey post-coup crackdown also targets US Protestants](#)," 4 December 2016.

¹⁶ *Le Monde*, « [Comment l'affaire du pasteur accusé d'espionnage a ruiné la relation américano-turque](#) », 15 August 2018.

ECLJ.¹⁷ Under intense diplomatic and economic pressure, Turkey released Brunson in October 2018 after two years of detention.

In the years that followed, Turkish authorities adopted a different strategy. Rather than risking the backlash triggered by Brunson’s imprisonment, they increasingly relied on silent, administrative, and non-judicial tools: no arrests, no trials, but routine refusals of entry or non-renewal of residence permits on vague “national security” grounds, without presenting a single piece of evidence. Since 2016, dozens of foreign Christians have been subjected to such measures, including visa denials and the imposition of restrictive administrative codes (such as “N-82” and “G-87”). These actions—arbitrary in many cases—have targeted individuals whose primary activities consisted of leading local congregations, participating in Bible studies, or engaging in charitable work.

3.4. Understanding the Persecution of Christians in Turkey

Understanding the persecution of Christians in Turkey requires more than documenting isolated incidents; it calls for a structural understanding of how different forms of hostility interact to marginalize Christian communities. Johan Galtung’s tripartite model—direct, structural, and cultural violence—provides an analytical lens through which the dynamics identified by the NGO Open Doors can be meaningfully interpreted.

- **Direct violence** includes hate crimes, physical assaults, threats, church vandalism, and even murders. These incidents, often dismissed as isolated acts, occur within a broader climate of impunity in which authorities rarely prosecute perpetrators, emboldening repeated aggression.
- **Structural violence**, embedded in Turkey’s legal and administrative framework, reflects what Open Doors identifies as *Islamic oppression* combined with *religious nationalism*. The State’s refusal to grant full legal recognition to churches, its restrictions on religious education, recurrent property confiscations, and discriminatory administrative practices all limit Christian life under the guise of national security. Since the failed coup of 2016, *dictatorial paranoia* has intensified these pressures: civil liberties have contracted sharply, including visa and entry bans issues, the media face severe restrictions, and Sunni Islam has been increasingly promoted as the normative religious identity of the Turkish nation.
- **Cultural violence** reinforces these structural constraints by normalizing anti-Christian prejudice through public discourse, media narratives, and national identity. Here again, Open Doors’ categories are crucial: *religious nationalism* shapes the perception that a “true Turk” must be a Muslim, rendering Christian converts especially vulnerable. Converts are pressured by family and community to renounce their faith, accused of betraying family honor or “insulting Turkishness.” Non-convert Christians—Armenians, Greeks, and Syriacs—are viewed as inherently foreign, tolerated rather than accepted. In the southeast, *ethno-religious hostility* intersects with the Kurdish conflict, placing Syriac Christians between tribal authorities, PKK militants, and government forces, often resulting in pressure to abandon ancestral lands.

Taken together, these forces—direct violence, structural discrimination rooted in Islamic oppression and authoritarian governance, and cultural narratives shaped by religious nationalism and ethno-religious hostility—form a self-reinforcing system. Christians in Turkey

¹⁷ ECLJ, [“Update on the case of Andrew Brunson: He has been released!”](#), 12 October 2018.

are not only threatened physically; they are marginalized institutionally and delegitimized symbolically, creating an environment in which their presence is persistently contested and their rights systematically undermined.

This is why, in 2025, Open Doors ranks Turkey 45th among the countries that most severely persecute Christians, with a score of 67/100, representing the overall level of pressure and violence faced by Christians in the country. According to the World Watch List 2025, the persecution pattern in Turkey shows the following trends, with a maximum of 16.7 points for each sphere of life:

- The average pressure on Christians remains extremely high at 12.2 points.
- The highest pressure is found in the **National sphere of life (13.2 points)**, reflecting strong animosity toward Christians fueled by both nationalist sentiment and widespread social hostility toward anything perceived as Christian. This affects not only individual believers but also Christian organizations, which encounter biased media coverage and frequent discrimination in their interactions with State authorities.
- The second-highest pressure is in the **Private sphere (13.0 points)**, highlighting the challenges faced by converts who cannot openly practice their faith within their families, as well as the general need for all Christians to be cautious about discussing their beliefs in a climate that is increasingly hostile toward Christianity.
- **Family life (11.7 points), Community life (11.7 points), and Church life (11.5 points)** also score very high.
- The **violence score** rose from 3.1 in WWL 2024 to **5.4 in WWL 2025**, largely due to an increase in reported killings and attacks on church buildings.

4. A Hostile Sociopolitical Environment

Despite Turkey’s constitutional guarantees of secularism and equality, Christians today face a sociopolitical environment marked by hostility, suspicion, and growing insecurity. Violence against churches and individuals has increased in recent years, while government rhetoric, pro-government media narratives, and widespread public prejudice reinforce the idea that Christians are foreign, disloyal, or dangerous. This hostile climate is further entrenched by the denial of historical atrocities, biased religious education, and discriminatory administrative practices that undermine the daily exercise of Christian life. The following sections illustrate how these combined dynamics—from physical attacks to media incitement and State policies—create an atmosphere of intimidation and structural vulnerability for all Christian communities in Turkey.

4.1. Direct Violence Against Christians

- On New Year’s Eve 2025, a gunman opened fire on the premises of an association affiliated with the Kurtuluş Protestant Church in Istanbul’s Çekmeköy district. According to eyewitnesses, the assailant shouted, “We will not allow you to brainwash our Muslim youth! You infidels will be defeated and driven into hell!”¹⁸
- On 28 January 2024, two masked gunmen from the Islamic State opened fire inside the Santa Maria Roman Catholic Church in Istanbul during Sunday Mass and killed one

¹⁸ Stockholm Center for Freedom, “[Gunman fires on Christian association in İstanbul](#),” 2 January 2025.

person, later identified as Tuncer Cihan, a 52-year-old Alevi Muslim who regularly attended Mass.¹⁹

- On 18 December 2023, two assailants attacked Çekmeköy Kurtuluş Church in Istanbul and tore down its main entrance sign. The act was widely condemned as a targeted threat against the Protestant community.²⁰
- On 6 November 2023, unidentified assailants attacked 92-year-old Gavriye Akguc, a member of the Syriac community from Enhil village in the historic Tur Abdin region. The perpetrators fired five bullets at Akguc, who was subsequently rushed to the hospital but succumbed to his wounds.²¹
- On 6 November 2023, a man entered a church service in Eskişehir Province and punched a pastor, stating he “wanted to test how tolerant Christians were.”²²
- On 25 November 2023, two assailants forced entry into the same Protestant church in Eskişehir, and they asked the pastor: “Are you Jewish? Are you Israeli? If you call the police, we will set you alight.”²³
- On 17 January 2023, the phrase “İslam is the only way” was found spray-painted on the outer wall of the Aya Yorgi Greek Orthodox Church in Istanbul.²⁴



The Islamic State group has claimed responsibility for an attack that killed one person during Sunday Mass at a Roman Catholic church in Istanbul on 28 January 2024. CCTV footage of the church during the shooting. (Source: [Sky News](#))

¹⁹ Catholic News Agency, “[Victim of Istanbul attack was a Muslim who often went to Catholic Mass](#),” 31 January 2024.

²⁰ EMRE TİMURR, “[Provocative Attack on a Church in Çekmeköy](#),” 22 December 2023.

²¹ Syriac Press, “[TURKEY: Syriac elder in Tur Abdin fatally shot by unknown assailants](#),” 7 November 2023.

²² Christian Post, “[Protestant Christians in Turkey facing violence, attacks at worship services](#),” 20 June 2024.

²³ Christian Post, “[Protestant Christians in Turkey facing violence, attacks at worship services](#),” 20 June 2024.

²⁴ [U.S. International Religious Freedom 2023 Turkey Report](#).

- On 8 May 2020, an Armenian Apostolic church in Istanbul was targeted in an arson attack when a perpetrator attempted to set its gate on fire. When arrested, the perpetrator indicated that the attack was motivated by a perceived connection between Armenian people and the spread of COVID-19.²⁵
- On 9 January 2020, Syriac Orthodox monk Aho Bileçen, also known as Father Sefer, was arrested and later sentenced on 7 April 2021 to 25 months in prison for “aiding a terrorist organization,” after giving bread and water to PKK militants who had come to the monastery in 2018. Father Sefer defended his actions as a humanitarian gesture and part of his Christian duty to assist anyone in need, regardless of their identity.²⁶

- **The Tragic Story of Hurmuz and Şimuni Diril and the Erasure of One of Turkey’s Last Christian Villages**

Hurmuz and Şimuni Diril, a Chaldean Christian couple with eleven children, were among the last remaining Christians in the village of Mehr (known in Turkish as Kovankaya), located in the Şırnak Province of southeastern Turkey. Once home to a thriving Assyro-Chaldean population, the village was razed twice by the Turkish military—in 1989 and again in 1994. Throughout the 1980s and 1990s, it was progressively emptied due to the escalating conflict between the Turkish armed forces and the Kurdistan Workers’ Party (PKK), creating a climate of impunity in which forced labor, killings, theft, extortion, abductions, and the rape and forced conversion of young Christian girls occurred. Like many other Christian families, the Dirils were forced to flee their ancestral homeland. Today, most former residents and their descendants live in France, particularly in the Paris region.

In a courageous act of return, Hurmuz and Şimuni resettled in Mehr around 2010 to reclaim their heritage and rebuild a Christian presence in the region. Their son, Father Adday Ramzi Diril—a Chaldean Catholic priest based in Istanbul and well-known for his pastoral work among Iraqi refugees—celebrated Mass in the village whenever possible, helping to revive its spiritual life. The couple maintained and cared for the small church of Marta Shimoni, which had been built into the rock of their village.

Tragedy struck on 11 January 2020, when Hurmuz and Şimuni were abducted from their home by unidentified armed men. Şimuni’s body was found on 20 March 2020 in a nearby stream; reports indicated that she had died from exposure to cold and harsh conditions. Hurmuz Diril remains missing to this day. Despite investigations and several detentions, no one has been held accountable.²⁷

On 11 May 2021, the church they had rebuilt and lovingly maintained was desecrated. Crosses, rosaries, and images of Christ were thrown outside the building, and religious objects were scattered across the site, although the structure itself remained intact due to its integration into the rock.²⁸

²⁵ *News.am*, “[Man who tries to set fire to Armenian church in Istanbul says Armenians 'brought' COVID-19](#),” 10 May 2020.

²⁶ ECLJ, “[Turkey: Assyrian Monk Imprisoned again for Giving Water to People from the PKK](#),” 11 May 2021.

²⁷ *Le Monde*, “[En Turquie, disparition tragique et mystérieuse d’un couple de chrétiens d’Orient](#)», 26 March 2020.

²⁸ *Persecution.org*, “[Church Attacked and Desecrated in Eastern Turkey](#),” 14 May 2021.



Diril and Hurmuz Diril (source: [Rudaw](#))

4.2. A Growing Convergence of Political, Media, and Societal Narratives Against Christians

In recent years, Christian communities in Turkey have increasingly become scapegoats in political, media, and societal discourse. Under President Erdoğan, national identity has been tightly tied to Turkish ethnicity and Sunni Islam, fostering an environment in which Christians—and, increasingly, Jews since the 7 October massacre²⁹—are portrayed as alien, subversive, or instruments of foreign influence. This framing weakens public trust in these communities and undermines their ability to participate fully in civic life.

According to the European Commission against Racism and Intolerance (ECRI), “hate speech against religious and ethnic minorities, such as Alevi, various non-Muslim groups and Kurds, is widespread in the media,” stressing that such rhetoric “is particularly widespread during election periods.”³⁰ Political actors and media outlets—especially pro-government papers such as *Yeni Akit*, known for its Islamist and ultra-nationalist positions—regularly amplify prejudiced narratives. These outlets frequently associate Christians with Western imperialism, crusader imagery, Zionism, or even terrorism, reinforcing the notion that Christians constitute a disloyal “fifth column.”³¹

On 7 November 2024, for instance, *Yeni Akit* accused a “satanic Zionist lobby” of orchestrating a smear campaign through Google and Wikipedia, lumping together “Jews, Christians, atheists,

²⁹ *The Times of Israel*, “‘Jews not allowed’: As Erdoğan praises Hamas, antisemitism rages in Turkey”, 30 October 2023.

³⁰ European Commission against Racism and Intolerance (ECRI), “[ECRI Report on Türkiye](#),” adopted on 18 June 2023, published on 12 June 2025.

³¹ *Stockholm Center for Freedom*, “[Hate Speech Against Christians in Erdoğan’s Turkey](#),” August 2017.

and homosexuals” as conspirators.³² The newspaper has repeatedly urged readers to reject Christian customs such as Christmas and New Year’s celebrations, describing them as “holidays imposed by the capitalist system to promote consumerism,” and adding that “even the cursed Jewish community doesn’t celebrate them.”³³

The Hrant Dink Foundation’s decade-long monitoring project (2009–2019) confirms that while the ranking of targeted groups fluctuates with political trends, certain identities remain consistent targets of hate speech. Armenians, Jews, Christians, Greeks, and Greek Cypriots are persistently vilified, often through inherited historical narratives reinforced by political rhetoric. Armenians are disproportionately subjected to discourses of enmity and war, depicted as both “internal and external threats to national identity.” Greeks and Greek Cypriots frequently appear in entrenched narratives of “hostility,” long embedded in Turkish media portrayals that cast them as adversaries.³⁴

This anti-Christian rhetoric in the media has real-world consequences. Documented hate crimes targeting Christians more than doubled between 2021 and 2023—from 10 incidents in 2021 to 22 in 2023—making Christians the most frequently targeted religious group, followed by Alevis and Jews, according to the *Norwegian Helsinki Committee’s Freedom of Belief Initiative*.³⁵ In 2023, the OSCE recorded 16 anti-Christian hate crimes in Turkey, and 17 crimes in 2024.³⁶ These incidents include property damage, harassment, physical violence, and the desecration of worship spaces. In many cases, anti-Christian hate speech intersects with ethnic prejudice: Armenians, Assyrians, and Greeks are targeted not only for their religion but also for their ethnic identity. In Turkey, where religious and ethnic identity are often historically intertwined, distinguishing between the two is particularly difficult.

On 4 May 2020, President Erdoğan referred to survivors of the Armenian genocide as “terrorists escaped from the sword,” a deeply provocative phrase echoing the Ottoman-era metaphor *kılıç artığı*. Just days later, two Armenian churches in Istanbul were attacked (on 8 May and 23 May 2020), and the Hrant Dink Foundation received death threats. The convergence of inflammatory official rhetoric and aggressive media narratives creates an atmosphere of intolerance that normalizes hate crimes—whether violent, symbolic, or directed at religious property—further marginalizing an already vulnerable Christian minority.

Attacks on Christian places of worship and religious sites (excluding Islamist terrorist attacks) have risen sharply since 2015. This increase is driven both by deliberate human actions—vandalism, graffiti, treasure hunting, stone extraction, break-ins, theft, attempted arson, and physical intimidation—and by neglect or targeted inaction from State authorities. Erosion, overgrowth, structural decay, fires, and seismic activity frequently go unaddressed, accelerating the deterioration of already vulnerable religious heritage.³⁷

- ***Bremner v. Turkey* (ECtHR, 2015)**

A media-driven trap involving a foreign Christian eventually led to a judgment before the European Court of Human Rights. In 1997, Dion Ross Bremner, an Australian journalist who also volunteered with a Christian bookshop, mailed Christian literature to an individual who had responded to an advertisement offering free books. After several phone conversations, they

³² *Yeni Akit*, “[A vile perception operation by Zionists against Yeni Akit!](#),” 7 November 2024.

³³ *Yeni Akit*, “[Don’t follow Christian customs](#),” 31 December 2024.

³⁴ *Hrant Dink Foundation*, “[Hate Speech: Contemporary Issues and Debates](#),” March 2025.

³⁵ *Norwegian Helsinki Committee’s Freedom of Belief Initiative*, “[Hate Crimes Motivated by Bias against Religion, Belief, or Non-Belief in Türkiye 2023 Report – Summary Findings](#),” August 2024.

³⁶ OSCE – ODIHR, [Anti-Christian hate crime Report, Turkey](#).

³⁷ ECLJ, “[The worrying increase in attacks on Christian sites in Turkey](#),” 16 December 2023.

agreed to meet in Samsun. Unbeknownst to Bremner, the encounter was filmed covertly for a television documentary on “foreign peddlers in religion.”

The documentary portrayed Bremner as a covert missionary. The narration claimed he was secretly teaching Biblical doctrine and comparing Christianity with other religions. A second meeting—also secretly recorded—showed the program’s presenter confronting Bremner as he explained that he shared Christianity on a voluntary basis. Following the broadcast, Bremner was taken into police custody and prosecuted for insulting God and Islam. He was acquitted in 1998 for lack of evidence. He then filed a civil suit against the documentary’s producers and presenter, but his claim was dismissed on the grounds that the program addressed a matter of public interest.

The ECtHR, however, held in 2015 that broadcasting the unblurred image of a private individual filmed with a hidden camera did not contribute meaningfully to a debate of general interest. The Court unanimously found a violation of Article 8 (right to private life), concluding that Turkey had failed to provide adequate protection and that the interference with Bremner’s privacy was not justified.³⁸

4.3. Denial of the Armenian Genocide

One of the most persistent taboos in modern Turkish political and cultural life is the question of the Armenian genocide—the mass deportations, massacres, and extermination of approximately 1.5 million Armenians, along with an estimated 500,000 other Christians, including Assyrian, Chaldean, Syriac, and Pontic Greek communities, carried out by Ottoman authorities during World War I amid the Empire’s disintegration. While the overwhelming majority of historians and legal scholars—as well as 33 countries, including France and the United States, and institutions such as the European Parliament—recognize these events as genocide under international law, the Republic of Turkey has consistently rejected this characterization.

Instead, Turkey portrays the events as a wartime tragedy that affected multiple populations and denies any intent to destroy the Armenian people as such. Turkish officials often reverse the blame, arguing that Armenians brought the violence upon themselves through alleged collaboration with foreign powers. While disputing the scale of the death toll, they maintain that the losses—however tragic—occurred under chaotic wartime conditions marked by banditry, famine, disease, and administrative breakdown. They further point out that the Ottoman government punished certain local officials for abuses committed during the deportations. For these reasons, Ankara rejects any allegation of premeditated extermination and accuses those advocating genocide recognition—particularly Armenia and the Armenian diaspora—of spreading anti-Turkish propaganda.³⁹ Since 1993, Turkish history textbooks have included sections devoted to refuting the genocide.

This narrative is actively defended and enforced by law. The main legal instrument used to suppress recognition of the genocide is Article 301 of the Turkish Penal Code. Introduced in 2005, Article 301 criminalizes “insulting the Turkish nation,” a vague provision frequently employed against journalists, intellectuals, and activists. The law originally penalized “insulting Turkishness,” but was amended in 2008 following significant international criticism.⁴⁰ Today,

³⁸ ECtHR, *Bremner v. Turkey*, No. 37428/06, 2015.

³⁹ [Republic of Turkey Ministry of Foreign Affairs, The Events of 1915 and the Turkish-Armenian Controversy over History: An Overview.](#)

⁴⁰ Ovipot, « [L’article 301 du Code pénal turc à nouveau sur la sellette](#) », 19 November 2008.

prosecutions under Article 301 require authorization from the Minister of Justice, yet the article remains a powerful tool for criminalizing dissent—especially concerning historical memory and the Armenian question.

This law has had real and devastating consequences. The most emblematic case is that of Hrant Dink, a prominent Armenian journalist and editor of the bilingual newspaper *Agos*. Dink was prosecuted under Article 301 in 2005 for “insulting Turkishness” after publicly calling for reconciliation and recognition of the genocide. He received numerous threats and was vilified in nationalist media. On 19 January 2007, Dink was assassinated outside his newspaper’s office in Istanbul by a 17-year-old extremist. Subsequent investigations revealed that Turkish security services had been warned of threats against Dink but failed to act. In 2010, the European Court of Human Rights held Turkey responsible for violating Dink’s right to life and freedom of expression.⁴¹

Another internationally known case is that of Orhan Pamuk, Turkey’s most celebrated novelist and winner of the 2006 Nobel Prize in Literature. In a 2005 interview, Pamuk stated: “Thirty thousand Kurds and a million Armenians were killed in these lands, and nobody dares to talk about it.” He was immediately charged under Article 301 and faced intense backlash in both media and political spheres. Although the charges were eventually dropped under international pressure, Pamuk was forced to leave the country temporarily and has remained a recurring target of nationalist hostility. His case has become emblematic of the impossibility of openly confronting historical taboos in Turkey.⁴²



Thousands participated in the March for Justice commemorating the 100th anniversary of the Armenian genocide, on Sunset Blvd. in Hollywood in 2015. (Source: [Latimes](#))

⁴¹ ECtHR, *Dink v. Turkey*, No. 2668/07, 6102/08, 30079/08, 7072/09 and 7124/09, 2010.

⁴² Amnesty International, « [TURQUIE - Le tribunal abandonne les poursuites contre le romancier Orhan Pamuk](#) », 23 January 2006.

4.4. Religious Education and Indoctrination in Schools

In principle, the Turkish Constitution guarantees secularism and freedom of religion. In practice, however, the public education system promotes a religious identity closely tied to Sunni Islam and Turkish nationalism, leaving Christian minorities—and other non-Muslim groups such as Alevis—at a structural disadvantage.

A major driver of this trend is the expansion of *imam hatip* religious schools. Originally created to train imams, they have been integrated into the national system and now number more than 5,000. Even in regular public schools, “spiritual counselors”—often imams—are assigned to guide students, and Islamic references increasingly appear across subjects taught in science, literature, and social studies. High school biology books teach creationism alongside evolution, and after the 2023 earthquake some schools told children that disasters reflect divine destiny or punishment.⁴³

Religious education is compulsory from primary through high school. The main course—Religious Culture and Moral Knowledge—is officially designed to teach all religions, but in reality focuses almost entirely on Sunni Islamic doctrine, practices, and moral values. Christianity is often omitted, oversimplified, or presented with prejudice. Protestant communities in Turkey have repeatedly noted that textbooks depict Christians mainly as “missionaries,” implying deceitful or corrupting intentions toward Muslims.

Although members of “recognized” minorities under the Treaty of Lausanne (Greek Orthodox, Armenian Apostolic, and Jews) may request an exemption from compulsory classes, the process remains burdensome and inconsistent. Christians not recognized under Lausanne—Catholics, Protestants, Assyrians, Chaldeans—face even more obstacles, and their exemption requests are often rejected. For converts from Islam, exemption is nearly impossible, because the system requires their official registration as non-Muslim—an action that can provoke family conflict, social stigma, and bureaucratic retaliation.

The European Court of Human Rights (ECtHR) has twice ruled that Turkey’s religious curriculum violates the rights of parents and children to education in line with their convictions—first in *Hasan and Eylem Zengin v. Turkey* (2007), then again in *Mansur Yalçın and Others v. Turkey* (2014).⁴⁴ Both judgments found that the curriculum is not objective or pluralistic, and that the exemption system does not work in practice. Despite these rulings, compulsory religious classes remain in place,⁴⁵ and in June 2024 the Council of Europe expressed “deep regret” that Turkey still requires students to take these courses unless parents disclose their religious beliefs—something many Christian families fear to do.⁴⁶

Indoctrination also occurs outside the classroom. School ceremonies, textbooks, and extracurricular activities often include Qur’anic recitations, Islamic prayers, and religious rhetoric that reinforces the idea that being Turkish means being Muslim. Christian students frequently report pressure to participate in Islamic practices, such as fasting during Ramadan or attending mosque visits, which contributes to feelings of exclusion.

A limited alternative exists through the minority schools run by Greek Orthodox, Armenian Apostolic, and Jewish community foundations. These schools preserve cultural and religious identity, but the State covers only the salaries of teachers for mandatory subjects in Turkish.

⁴³ France Info, « [En Turquie, le poids grandissant de l’islam à l’école](#) », 2 March 2024.

⁴⁴ ECtHR, *Mansur Yalçın and Others v. Turkey*, No. 21163/11, 2014.

⁴⁵ Turkey, [Main Issues Before The Committee Of Ministers](#) - Ongoing Supervision, Last update: 19 September 2025.

⁴⁶ Council of Europe, “[Freedom of belief and non-discrimination in Türkiye: Council of Europe urges progress in cases on compulsory military service and religious education](#),” 19 June 2024.

All other expenses—including infrastructure, materials, and additional staffing—must be paid by the minority communities themselves, which face declining numbers and limited resources.⁴⁷

There are now only 16 Armenian, 6 Greek, and 1 Jewish schools left in the country.⁴⁸ Greek minority schools, in particular, are acutely sensitive to fluctuations in Greek-Turkish diplomatic relations and are frequently subjected to new administrative restrictions.⁴⁹ Armenian children without legal residency status, such as undocumented migrants or Syrian Armenian refugees, classified as “visitors,” may attend these schools but cannot receive official diplomas, undermining the continuity of Armenian identity.⁵⁰

Catholic schools do exist, but not as religious institutions. Because the Catholic Church lacks legal personality in Turkey, these schools operate under bilateral agreements with France or Italy and are treated as foreign private schools—not minority schools—and therefore receive no public funding.⁵¹

There are no Protestant schools in Turkey. Since Protestants are not recognized as a minority under Lausanne, they cannot operate religious schools or formal youth programs. Activities involving minors are sometimes investigated as “missionary work,” and Protestant families remain dependent on the public school system, where their children are routinely exposed to compulsory Islamic instruction and sometimes face discrimination.

4.5. Religious Identification on Identity Cards

For decades, Turkish identity cards included a field visibly displaying the holder’s religion, a practice that raised significant concerns among religious minorities. Although the Turkish government reformed this system in 2016 by removing the visible reference from newly issued chip-enabled ID cards, the issue persists: religious affiliation remains embedded in the digital chip and is accessible to authorized public officials. In this way, the State continues to monitor citizens’ religious identity, albeit less overtly.⁵²

Even before this reform, individuals could request that the religious field be left blank, following a 2006 legal amendment. However, in its 2010 judgment *Sinan Işık v. Turkey*, the European Court of Human Rights (ECtHR) held that the very existence of a religion field—whether filled or left empty—violates freedom of religion under Article 9 of the European Convention on Human Rights, which includes the right not to disclose one’s beliefs.⁵³

The Court emphasized that choosing to leave the field blank is itself revealing. An empty entry distinguishes its holder from others and may suggest non-conformity, unbelief, or dissent—

⁴⁷ *The Armenian Mirror-Spectator*, “[Istanbul Armenian Group Hosts Zulal Concert to Raise Funds for Schools](#)”, 24 October 2024.

⁴⁸ *Daily News*, “[Turkey’s minority schools struggle to survive amid low enrollment rates](#),” 19 November 2017.

⁴⁹ *Türkiye Today*, “[Greece’s school closures, silenced voices: Struggle of Turkish minority of Western Thrace](#),” 21 August 2025.

Ekathimerini, “[Greece, Turkey at odds over minority schools](#),” 5 October 2024.

The same applies to the French and German schools in Ankara and Istanbul, which have been barred from enrolling new Turkish students since August 2024. Turkey is demanding “reciprocity” from France and Germany regarding the ability to open Turkish schools in those countries. https://www.lemonde.fr/international/article/2024/09/02/les-ecoles-francaises-et-allemandes-d-ankara-et-d-istanbul-privees-de-nouveaux-eleves-turcs_6301673_3210.html

⁵⁰ U.S. International Religious Freedom 2023 Turkey Report.

⁵¹ Secrétariat général de l’Enseignement catholique, « [Les établissements catholiques francophones de Turquie](#) », 4 December 2019.

⁵² *Middle East Eye*, “[Turkey ditches religion from IDs as it eyes EU membership](#),” 17 February 2016.

⁵³ ECtHR, *Sinan Işık v. Turkey*, No. 21924/05, 2010.

regardless of the person's intentions. Thus, the option to leave the field blank does not neutralize the discriminatory nature of the system. It forces individuals either to disclose or to indirectly signal one of the most intimate aspects of their identity, under the control and scrutiny of public authorities.

Moreover, the list of religions available for selection remains limited. While available options include Muslim, Greek Orthodox, non-Orthodox Christian, and Jewish, many denominations—such as Syriac, Chaldean, or Protestant churches—are not explicitly listed. Individuals must therefore either select the vague categories “other” or “unknown,” or misrepresent their actual belief. This lack of recognition further reinforces the exclusion of unregistered Christian communities from full legal and social visibility.

These issues have concrete consequences. Religious identity—whether declared or omitted—can affect employment opportunities, access to public services, and even a child's ability to obtain exemptions from mandatory Islamic religious classes. For example, students may only opt out of compulsory Islamic education if both they and their parents are officially registered as members of a recognized non-Muslim minority. This effectively prevents many Christians—particularly converts—from exercising their right to religious freedom in practice.

5. Institutional Discrimination and Legal Marginalization

From the narrow interpretation of the Treaty of Lausanne to the absence of legal personality for churches, rigid control over religious leadership, and barriers to clergy training, the Turkish State maintains mechanisms that systematically limit the ability of Christian communities to organize, govern themselves, and transmit their faith. The following sections examine the principal legal and institutional structures that sustain this marginalization.

5.1. Legal Discrimination under the Treaty of Lausanne

The Treaty of Lausanne, signed in 1923, laid the foundations of the modern Republic of Turkey following the collapse of the Ottoman Empire. While presented as a diplomatic settlement meant to secure peace and stability, it also abolished the capitulations—the system of legal protections and special rights long enjoyed by foreign nationals and Christian communities under the Ottoman regime (at Article 28). Their removal placed all non-Muslims fully under Turkish sovereignty and eliminated the international legal safeguards they had previously relied upon. At the same time, the Treaty codified a limited set of protections for non-Muslim minorities within the new State. Articles 37 to 45 guarantee freedom of worship, the right to establish and manage religious and educational institutions, and the right for minorities to have their personal status governed by their own customs.

However, from the outset, the Turkish government adopted a narrow and highly selective interpretation of these provisions. Only three religious communities—Greek Orthodox Christians, Armenian Apostolic Christians, and Jews—were recognized as minorities under the Treaty. This recognition was tied to their institutional presence in the late Ottoman Empire and their integration into the millet system. All other non-Muslim groups—Assyrians, Chaldeans, Catholics, Protestants, Syriacs, and others—were excluded, despite their continuous historical presence in Anatolia.

This restrictive interpretation has had lasting and far-reaching consequences. Communities not officially recognized under Lausanne are denied legal personality. Their churches and schools cannot own property, open bank accounts, or receive donations under their own names. They

are prohibited from establishing seminaries and training clergy. Their pastors or priests lack legal status and are excluded from State-managed interreligious dialogue. Legal disputes involving these communities—over inheritance, property, taxation, or institutional governance—are frequently unresolved or dismissed because the groups themselves are not juridically recognized.

In practice, the freedoms and guarantees set out in the Treaty have become conditional privileges, extended only to the communities the State chooses to acknowledge. As the European Commission against Racism and Intolerance (ECRI) has emphasized, Turkey should treat Lausanne as a minimum standard, not as the maximum extent of its obligations toward religious minorities. Even the officially recognized Greek and Armenian communities do not fully enjoy the rights guaranteed to them. Turkish courts have at times invented legal restrictions supposedly based on Lausanne—for example, the fictitious rule prohibiting clergy from serving on the boards of Christian foundations, at stake in the *Mavrakis v. Turkey* case (as highlighted in the ECLJ’s written observations).⁵⁴

Rather than functioning as a safeguard, Lausanne has been used by Turkish authorities as a legal instrument of exclusion and control, limiting minority rights to a narrow list of groups and denying protections to all others. This dynamic is reinforced by Turkey’s refusal to accept that minority protections under international law apply universally. Turkey maintains that Article 27 of the International Covenant on Civil and Political Rights (ICCPR)—which protects the rights of ethnic, religious, and linguistic minorities—must be interpreted through the lens of its Constitution and Lausanne. As a result, Turkey restricts the application of Article 27 exclusively to Armenians, Greeks, and Jews, while excluding all other Christian communities from the scope of its international obligations.

5.2. Structural Obstacles to the Functioning of Christian Communities

Christian communities in Turkey face a set of structural impediments that prevent them from functioning normally as religious institutions. These include the denial of legal personality, State interference in the appointment of religious leaders, and the systematic obstruction of clergy training. Together, these obstacles undermine church autonomy and jeopardize the long-term survival of historic Christian communities.

5.2.1. Lack of Legal Personality for the Traditional Churches

In Turkey, no church—including those belonging to officially recognized minorities—enjoys legal personality as a religious institution.⁵⁵ This institutional void severely restricts the autonomy of Christian churches, particularly the Greek Orthodox Patriarchate of Constantinople (*Fener Rum Patrikhanesi*), which, despite being one of the oldest Christian institutions in the world and the spiritual leader of more than 250 million Orthodox Christians globally, lacks any legal recognition as a religious body. The same applies to the Armenian Patriarchate of Constantinople,⁵⁶ the Roman Catholic Church (including the Latin Apostolic

⁵⁴ ECLJ, [Written observations](#) submitted to the European Court of Human Rights in the *Niko MAVRAKIS v. Turkey and 2 other applications* (No. 12549/23), November 2024.

⁵⁵ European Commission for Democracy Through Law (Venice Commission), [Opinion on the Legal Status of Religious Communities in Turkey and the Right of the Orthodox Patriarchate of Istanbul to Use the Adjective “Ecumenical”](#), Adopted by the Venice Commission at its 82nd Plenary Session (Venice, 12-13 March 2010).

⁵⁶ *Public Orthodoxy*, [“Armenian Patriarchate and the Sanasaryan Han,”](#) 28 March 2019.

Vicariates of Istanbul⁵⁷ and Anatolia, the Latin Archdiocese of İzmir, and the Eastern Catholic Churches—Armenian, Chaldean, Greek, and Syriac), as well as to the Chief Rabbinate of the Jewish community.

Because they lack legal status, patriarchates, dioceses, and churches cannot own property in their own name, initiate legal proceedings, employ staff, open bank accounts, or formally interact with public authorities. They are compelled to operate indirectly through affiliated foundations or associations. This legal invisibility places them in a State of structural vulnerability and dependency, undermining their ability to function independently and threatening their institutional continuity.

There are, however, two notable exceptions—both indirect and limited.

- First, in 1957 the Turkish Court of Cassation recognized the Grand Rabbinate as the legal owner of a synagogue in İzmir. A second case reached the European Court of Human Rights (ECtHR): in 2023 the Court confirmed the Rabbinate’s ownership of a parcel of land on which a synagogue built in 1605 had stood, concluding a case first initiated in 2000 before the İzmir cadastral court. By that time, however, the Rabbinate had already obtained foundation status in 2011 and adopted the name “Foundation of the Jewish Community of İzmir.”⁵⁸
- Second, the Ecumenical Patriarchate of Constantinople acquired a property on the island of Büyükada in 1902 and entrusted its management in 1903 to the “Greek Orthodox Boys’ Orphanage Foundation of Büyükada.” The orphanage was evacuated and closed by Turkish authorities in 1964, and the foundation was declared *mazbut* (seized and placed under State control) in 1997. The Directorate General of Foundations then sought to annul the Patriarchate’s title deed and re-register the property in the name of the orphanage foundation, enabling the State to appropriate it. Turkish courts upheld the annulment, but in doing so implicitly acknowledged the prior recognition of the Patriarchate’s title deed—and, by extension, its *de facto* legal capacity to own property and to litigate.⁵⁹ After exhausting domestic remedies, the Patriarchate brought the case before the ECtHR, with the ECLJ intervening. In 2008, the Court found Turkey in violation of its right to property and ordered restitution of the orphanage. The property was returned in 2010,⁶⁰ and Turkey ultimately complied in 2012, though it still refuses to recognize the Patriarchate’s legal personality.

As early as 2010, the Council of Europe’s Venice Commission stated that it “sees no reason which would justify not granting to religious communities as such the possibility to obtain legal personality. It therefore recommends that Turkey introduce legislation that would make it possible for religious communities as such to acquire and maintain legal personality.”⁶¹

In its 2025 report on Turkey, the European Commission observed that “the lack of legal personality for non-Muslim and Alevi communities remained an unresolved issue, especially

⁵⁷ *Oasis Center*, “We do not ‘exist’ but we are here. The life of the Catholics in Turkey”, [Interview with Msgr. Louis Pelâtre, Vicar Apostolic of Istanbul](#), 16 May 2012.

⁵⁸ ECtHR, *Chief Rabbinate of the Jewish Community of İzmir v. Türkiye*, [No. 1574/12](#), 21 June 2023.

⁵⁹ Orhan Kemal Cengiz, “[Religious Minorities of Turkey, an Evaluation from the Perspective of Human Rights](#),” 2020, p.41.

⁶⁰ ECtHR, *Fener Rum Patriarchate (Ecumenical Patriarchate) v. Turkey*, [No. 14340/05](#), 8 July 2008 (merits) and 15 September 2010 (just satisfaction).

⁶¹ European Commission for Democracy Through Law (Venice Commission), Opinion on the Legal Status of Religious Communities in Turkey and the Right of the Orthodox Patriarchate of Istanbul to Use the Adjective “Ecumenical”, Adopted by the Venice Commission at its 82nd Plenary Session (Venice, 12-13 March 2010). §14.

regarding the legal status of places of worship. The Venice Commission’s recommendations to grant legal status to non-Muslim religions are yet to be implemented.”⁶²

Similarly, in its 2025 report, the European Commission against Racism and Intolerance (ECRI) noted that the absence of legal personality for minority religious communities “leads to problems and uncertainties, for example regarding legal ownership and property registration of designated places of worship, which should be owned by religious organizations” such as associations or foundations.⁶³



Prinkipo Greek Orphanage (Büyükkada)

Located on Manastır Hill in Büyükkada, originally constructed as a hotel, the Prinkipo Greek Orphanage served as an orphanage from 1903 to 1964 and is recognized as the largest wooden building in Europe and the second largest in the world. Damaged by a fire in 1980 and the 1999 Marmara earthquake, the structure today remains empty and unattended under the administration of the Greek Orthodox Patriarchate. (Source: [Expats.Istanbul](https://expatsistanbul.com))

5.2.2. Non-Recognition of the “Ecumenical” Status of the Greek Patriarchate and Governmental Interference in Patriarchal Elections

Since the founding of the Republic, the Turkish State has recognized the Patriarch of Constantinople **only as the religious leader of the Greek Orthodox minority in Turkey** and refuses to acknowledge his traditional title of “Ecumenical Patriarch.” This title has been used continuously in Orthodox canon law since the 6th century and is recognized by all other

⁶² European Commission, Directorate-General for Neighbourhood and Enlargement Negotiations, “[Türkiye Report 2025](#)”, 4 November 2025.

⁶³ European Commission against Racism and Intolerance (ECRI), “[ECRI Report on Türkiye](#),” adopted on 18 June 2023, published on 12 June 2025, §93.

Orthodox Churches as well as the World Council of Churches. The Ecumenical Patriarchate has been based in Anatolia since 330 A.D.

In 2007, the Turkish Court of Cassation stated that there was “no legal basis” for the Ecumenical Patriarchate’s ecumenical status. The Venice Commission firmly rejected this reasoning, stressing that no secular court has the competence to determine whether a religious leader is “ecumenical”, and that any attempt by the State to prevent the Patriarchate from using its historic title constitutes an unjustified interference with church autonomy and violates Article 9 ECHR (freedom of religion).

The Commission further examined the 1923 Treaty of Lausanne and found no provision—either in its text or travaux préparatoires—limiting the Patriarchate’s ecumenical character. On the contrary, Lausanne guarantees freedom of religion for non-Muslim communities and protects their institutions; it cannot be invoked to justify restrictions on internal ecclesiastical titles. These concerns have been repeatedly echoed by Council of Europe and EU bodies.⁶⁴

Under Turkish law, **only Turkish citizens may be elected Ecumenical Patriarch**, sit on the Holy Synod, or participate in patriarchal elections. This rule is maintained despite the demographic collapse of the Greek Orthodox minority, now numbering approximately 2,500 mostly elderly people. As a result, there are too few eligible hierarchs in Turkey to ensure the normal functioning of the Holy Synod and that gives the State a *de facto* veto over both electors and candidates, tightening State control over the Holy Synod’s internal governance.⁶⁵

Faced with this demographic bottleneck, the authorities introduced a stop-gap solution rather than removing the restrictive rule: in 2010, Turkey allowed 14 metropolitans of the Ecumenical Patriarchate living abroad to apply for exceptional Turkish citizenship, enabling them to sit on the Holy Synod.⁶⁶ However, this was an administrative workaround—not a structural reform—and did not address the underlying issue of State control.

The Venice Commission’s 2010 opinion concluded that such State-engineered constraints on the internal organization and leadership of a church are incompatible with Articles 9 and 11 ECHR, which protect the collective dimension of freedom of religion and the right of religious communities to choose their own leaders without arbitrary State interference.

The Armenian Apostolic Patriarchate of Istanbul has faced a similar pattern of interference. After Patriarch Mesrob Mutafoyan became incapacitated in 2008–2009, the Armenian community repeatedly sought permission to elect a new Patriarch. The authorities blocked these attempts for nearly a decade, imposing instead a Patriarchal Vicar-General (Archbishop Aram Ateshian)—a solution widely rejected by the community.⁶⁷

Two Turkish-Armenian lay leaders, Levon Berç Kuzukoğlu and Ohannes Garbis Balmumciyan, brought an individual application to the Turkish Constitutional Court in 2014, arguing that the authorities’ refusal to authorize an election violated Article 24 of the Constitution (freedom of religion). In a landmark judgment dated 22 May 2019 (Application No. 2014/17354), the Court found that the State’s interference was not “prescribed by law,”

⁶⁴ See the Parliamentary Assembly’s Resolution 1704 (2010) and the European Parliament’s 2025 report on Türkiye.

⁶⁵ *Nordic Monitor*, “[The Greek Orthodox minority in Turkey faces the threat of disappearance](#),” 11 March 2024.

⁶⁶ [Statement and recommendations](#) of The Ecumenical Patriarchate in Turkey, 2011 Human Dimension Implementation Meeting.

⁶⁷ *Armenian Weekly*, “[Turkey: Why Can’t Armenians Elect a Patriarch?](#),” 9 March 2018.

since there was no accessible and foreseeable legal framework regulating such restrictions, as required by Article 13 of the Constitution. The interference also violated “the spirit of Armenian traditions” and lacked any pressing social need. The Court thus found a violation of Article 24.⁶⁸

However, the judgment came only two months after Patriarch Mutafyan’s death and shortly before the community elected Bishop Sahak Maşalyan as the 85th Patriarch on 11 December 2019, meaning that the harm already inflicted over a decade was not remedied.⁶⁹ Moreover, during preparations for the 2019 election, the Interior Ministry issued a directive restricting eligibility to bishops already serving within the Istanbul Patriarchate, whereas in previous elections Armenian bishops from around the world could stand.⁷⁰ This significantly narrowed the field of candidates and, according to Armenian community representatives and the lawyer in the case, contradicted both historical practice and the spirit of the Constitutional Court’s judgment.

5.2.3. Obstruction of Clergy Training

One of the most emblematic examples of Turkey’s restrictions on Christian minorities is the continued closure of the Halki Seminary, located on the island of Heybeliada (Halki) near Istanbul. Founded in 1844 under the auspices of the Ecumenical Patriarchate of Constantinople, the seminary served for more than a century as the principal institution for the training of Orthodox clergy in Turkey and throughout the wider Orthodox world. In total, 930 clergymen were trained there, including 12 future patriarchs—among them the current Ecumenical Patriarch Bartholomew I.

In 1971, following a constitutional reform and a ruling of the Turkish Constitutional Court that prohibited private higher education institutions, the seminary was shut down. Its closure also occurred in a period of heightened tensions with Greece over Cyprus. While the government argued that the seminary could not operate outside the State-controlled university system, the Ecumenical Patriarchate has consistently maintained that theological formation is an essential element of religious freedom and ecclesiastical autonomy, protected under Article 9 ECHR and by international standards.

The closure of Halki Seminary places the Ecumenical Patriarchate in a state of structural dependence. Without the ability to train priests and bishops in Turkey, the Patriarchate must rely on clergy educated abroad—many of whom face residence permit restrictions, administrative obstacles, or even entry bans. This creates an artificial vulnerability for the Patriarchate’s future. The paradox is even sharper given that Turkey also requires the Ecumenical Patriarch to be a Turkish citizen, which further endangers the sustainability of the Greek Orthodox community in Turkey and has broader repercussions for global Orthodoxy, given the Patriarchate’s primacy within the Orthodox world.

Since the rise of the AKP in 2002, Turkish authorities have repeatedly promised to reopen the seminary, but no progress has been made. The issue remains closely tied to the state of Turkish-Greek relations. On 30 April 2025, the Greek Foreign Minister visited Halki to press for its reopening.⁷¹ The Turkish position, however, has remained consistent: reopening Halki is

⁶⁸ *Oxford Human Rights Hub*, “[The Turkish Constitutional Court – An Effective Remedy or a Way to Avoid ECtHR Cases?](#),” 11 April 2020.

⁶⁹ *Turkish Minute*, “[Turkey’s Armenian church unveils new patriarch in controversial election](#),” 11 December 2019.

⁷⁰ *Bianet*, “[New Obligations for Patriarch Candidates 'Attempt to Usurp Right to be Elected'](#),” 24 September 2019.

⁷¹ *Hürriyet Daily News*, “[Greek FM visits historic Istanbul seminary in push for reopening](#),” 2 May 2025.

conditioned on Greece improving the situation of the Muslim/Turkish minority in Western Thrace, particularly regarding minority schools and the construction or reopening of mosques, including former Ottoman mosques such as the Fethiye Mosque in Athens.⁷²

Despite sustained calls from the European Union, the United States, the Council of Europe, and the Venice Commission, successive Turkish governments have refused to allow the seminary to reopen. Its continued closure jeopardizes the very continuity of the Ecumenical Patriarchate in Istanbul. It is widely regarded as a symbolic indicator of Turkey's unwillingness to fully guarantee the religious freedom of non-Muslim minorities and as a bargaining tool in wider political negotiations.



Theological School of Halki

For over a century, the Theological School of Halki was one of the foremost Orthodox seminaries anywhere in the world, training hierarchs and clergy for the Church around the globe. Turkish authorities, however, forced it to close it in 1971, and since then, numerous efforts to reopen it have come to naught. In recent months, there have been new discussions regarding its eventual reopening. (Source: [Archons](#))

⁷² *Archons*, “[Could the Halki Theological School Soon Reopen? ‘We are Both Happy and Hopeful.’](#),” 25 February 2025.

6. The System of Community Foundations in Turkey and State Interference in Minority Properties and Governance

The system of community foundations (*cemaat vakıfları*) is the central legal framework through which Christian and Jewish minorities administer their churches, schools, cemeteries, hospitals, and charitable institutions in Turkey. Created to safeguard the heritage of historic non-Muslim communities, these foundations have increasingly become the main lever through which the State restricts, supervises, and often dispossesses religious minorities.

Over the decades, the Turkish authorities have combined legal constraints, administrative obstruction, and selective enforcement to limit the autonomy of Christian foundations. The State has frequently failed in its duty to protect minority properties—allowing their deterioration, preventing their maintenance, or blocking the election of their governing boards—before exploiting these vulnerabilities to seize control. The fate of the Greek Orphanage of Prinkipo on Büyükkada, left to decay and later absorbed through the *mazbut* mechanism, is emblematic of this pattern.

As documented by the U.S. Commission on International Religious Freedom (USCIRF), Christian heritage is exposed to two categories of violations:

- Human-induced damage—vandalism, looting, treasure hunting, illegal stone extraction, arson, intimidation, and attacks on worship sites;
- Damage caused or aggravated by official negligence—lack of maintenance, deliberate non-intervention, vulnerability to erosion, vegetation, fires, and earthquakes.

These practices mirror the demographic decline of Christian communities themselves. The Greek Orthodox population, which numbered around 100,000 in 1923, has fallen to fewer than 2,500 today—yet remains responsible for around 4,000 properties belonging to their foundations. This imbalance places their cultural heritage, and ultimately their continued presence in Anatolia, at severe risk.

Turkey currently recognizes 167 community foundations (77 Greek, 54 Armenian, 19 Jewish, 10 Syriac, 3 Chaldean, 2 Bulgarian, and one Georgian and Maronite foundation each).⁷³ But recognition does not mean protection. In 2010, the General Directorate of Foundations (VGM) declared 48 Greek and Jewish foundations “disused”, seizing their assets and revenues—hundreds of properties in total—in violation of Article 1 of Protocol No. 1 to the European Convention on Human Rights and in a context of systemic religious discrimination.⁷⁴

Although Turkey claims to have returned 1,084 properties to non-Muslim foundations between 2003 and 2018, this figure remains limited compared to the thousands of assets that remain unrestituted, unregistered, or under Treasury control.⁷⁵ Restitutions have been slow, incomplete, and often politically selective.

Against this background, the ECLJ has consistently defended the right of Christian foundations to manage their institutions freely and without State interference. The cases analyzed in the subsections that follow illustrate a deliberate strategy of administrative asphyxiation: blocking board elections, imposing *mazbut* trusteeship, refusing to implement court orders, and using the 1936 Declaration and the 1974 case-law as a pretext for expropriation. Together, these practices

⁷³ [Cemaat Vakıfları](#).

⁷⁴ Ecumenical Federation of Constantinopolitans, *A Short History of the Treatment of the Greek-Orthodox Community of Istanbul (1923-2009) and Present Human and Minority Rights Issues*, 2009.

⁷⁵ Human Rights Council, Working Group on the Universal Periodic Review, National Report of Turkey ([A/HRC/WG.6/35/TUR/1](#)), 14 November 2019, § 69.

reveal a structural system designed to undermine the autonomy, continuity, and survival of Christian communities in Turkey.

6.1. A State-Engineered Dispossession of Community Foundations: The 1936 Declaration and the 1974 Case-Law

The legal regime governing non-Muslim communities in Turkey is closely tied to the system of community foundations (*vakıf*). Since the Ottoman era, both Muslim and non-Muslim groups have managed religious and charitable institutions—churches, schools, cemeteries, hospitals—through these foundations, which held property on behalf of the community.

Until 1912, however, foundations were not recognized as legal persons under Ottoman law. Because they lacked legal personality, they could not register property in their own name. As a result, immovable assets were instead recorded under the names of deceased “holy persons” or of trusted individuals holding property informally for the community.

After the establishment of the Republic in 1923, Law No. 2762 on Foundations (13 June 1935) recognized the legal personality of foundations created under the Ottoman Empire. Meanwhile, foundations created after the entry into force of the Civil Code of 1926 were governed by that Code. The 1935 Law required all minority foundations to submit a 1936 Declaration, listing all immovable properties and sources of income. Although designed as a technical inventory, this declaration became the legal benchmark used to define and limit the patrimony of minority foundations.

At first, the 1936 Declaration was treated purely descriptively, and foundations continued to acquire new property. But from the 1950s onward, as tensions between Greece and Turkey escalated over Cyprus, minority foundations increasingly became targets of political retaliation. Cyprus’s independence in 1960, the intercommunal violence of 1964, and Turkey’s 1974 military intervention profoundly worsened their situation.

In 1974, the Plenary Assembly of the Court of Cassation delivered a landmark ruling with devastating consequences:

- All properties acquired after 1936 by minority foundations—whether purchased, donated, or inherited—were deemed invalid.
- Only assets explicitly listed in the 1936 Declaration were recognized as lawful.

The courts therefore ordered minority foundations to return all post-1936 properties to the alleged or presumed heirs of the original owners—or to the State, whenever no heirs could be identified. This resulted in the massive loss of real estate belonging to Christian foundations, including churches, schools, cemeteries, orphanages, and income-producing buildings essential to sustaining communal life.

This mechanism violated the right to property because it relied on retroactive, unforeseeable judicial reinterpretation, contrary to the principle of legal certainty. Minority foundations recognized under the Treaty of Lausanne are full legal persons with genuine property rights; they cannot be quietly stripped of their assets through the manipulation of historical inventories.

International criticism intensified over time. The European Court of Human Rights, the Council of Europe, and the European Union repeatedly condemned these confiscations as violations of property rights and religious freedom.

In response—and as part of Turkey’s EU harmonization effort—several legislative reforms were adopted: Law No. 4771 (2002), Law No. 4778 (2003) and Law No. 4928 (2003). These

laws formally recognized certain property rights for minority foundations, but also strengthened State oversight of their management.

A major reform came with Law No. 5737 (20 February 2008), which repealed the 1935 Law and established a unified framework for all Turkish foundations, including those belonging to non-Muslim minorities. While it aimed to modernize the system and regularize property ownership, it maintained strict administrative control under the General Directorate of Foundations (*Vakıflar Genel Müdürlüğü*) and allowed only partial, conditional restitution of confiscated properties. A provisional Article 11 adopted in 2011 enabled restitution or compensation for some seized assets, but only for properties explicitly listed in the 1936 Declaration—leaving many claims unresolved.

Thus, the 1936 Declaration remains the core structural problem: a technical inventory turned into a restrictive ceiling, enabling decades of systematic expropriation. Although progress has been made, the legacy of confiscations continues to weaken the autonomy and survival of Christian communities.

The non-implementation of court decisions remains another serious issue. Even when Turkish courts recognize the property rights of Christian foundations, authorities frequently ignore or delay enforcement. A striking example is the 2022 Constitutional Court judgment recognizing the Vakıflıköy Armenian Church Foundation's rights over 36 properties, which authorities still refuse to return—despite the impossibility of filing a 1936 Declaration, since Hatay only joined Turkey in 1939.⁷⁶

In many cases, Turkey complies only when compelled by the European Court of Human Rights. This was true in *Yedikule Surp Pirgiç Ermeni Hastanesi Vakfı v. Turkey*, which ended in a friendly settlement in 2007.⁷⁷ But in numerous other cases, the ECtHR must issue a full judgment, routinely finding violations of the right to property and ordering restitution or reopening of domestic proceedings.

6.2. ECtHR Case-Law Illustrating the Expropriation of Christian Foundations

The European Court of Human Rights has repeatedly condemned Turkey for violating the property rights of Christian community foundations. The following groups of cases show how different legal and administrative techniques—often centered on the 1936 Declaration and the 1974 Court of Cassation case-law—have been used to dispossess Greek Orthodox, Armenian, and Syriac foundations.

6.2.1. Properties Acquired After 1936: Retroactive Annulment of Titles

In *Fener Rum Erkek Lisesi Vakfı v. Turkey* (2007), the foundation of the Greek high school in the Phanar district had lawfully acquired two properties in 1952 and 1958 with the explicit approval of the authorities and had held them for decades, paying taxes. On the basis of the 1974 case-law, Turkish courts later annulled the foundation's title, arguing that the 1936 Declaration did not authorize acquisitions after 1936.

⁷⁶ Agos, "[The properties of the Armenians of Vakıflıköy are not being returned despite the Constitutional Court's ruling](#)," 31 January 2025.

⁷⁷ ECtHR, *Yedikule Surp Pirgiç Ermeni Hastanesi Vakfı v. Turkey*, [No. 50147/99 and 51207/99](#), 2007.

The ECtHR held that this retroactive reinterpretation of the law was unforeseeable and violated Article 1 of Protocol No. 1 (protection of property). It ordered *restitutio in integrum*: Turkey had to re-register the properties in the foundation's name or pay substantial compensation.⁷⁸

The same pattern appears in *Samatya Surp Kevork Ermeni Kilisesi, Mektebi Ve Mezarlığı Vakfı Yönetim Kurulu v. Turkey* (2008), where an Armenian foundation lost a property acquired in 1955. The Court again found that the use of the 1936 Declaration and 1974 case-law to invalidate long-standing acquisitions amounted to an unlawful deprivation of property, and again ordered the restitution of the property.⁷⁹

6.2.2. Properties Historically Belonging to Foundations but Registered Under “Fictitious Names”

In *Foundation of the Greek Orthodox Church of Taxiarchis in Arnavutköy v. Turkey* (2022), the applicant foundation claimed a plot historically registered under a fictitious Christian name and the designation of a holy spring (*ayanikola ayazması*).⁸⁰ Various administrative decisions (1952, 1983, 2003) had explicitly recognized that the land belonged to the church and should be registered in the foundation's name, and it appeared in the 1936 Declaration.⁸¹

Nevertheless, domestic courts ignored this evidence, treated the plot as public “pasture” and “missing owner” property, and registered it in the name of the Treasury. The ECtHR held that the foundation had a “possession” and that the courts had failed to properly examine the facts and evidence. It found a violation of Article 1 of Protocol No. 1, highlighting a pattern of denial of Christian ownership through defective fact-finding and misuse of cadastral rules. The Court did not order restitution, but indicated that reopening or retrying the case was the appropriate remedy.

6.2.3. Properties Lawfully Acquired Before 1936 but Omitted from the 1936 Declaration

In *Bozcaada Kimisis Teodoku Rum Ortodoks Kilisesi Vakfı v. Turkey (No. 2)* (2009), the Greek Orthodox foundation on the island of Bozcaada sought recognition of long-possessed properties: a cemetery, a large plot of land, several houses, a chapel, and a former monastery. Witnesses, tax records, leases, and cadastral documents confirmed the foundation's continuous possession and use.

The cadastral court accepted ownership for the cemetery and one plot (relying on special rules for religious cemeteries and acquisitive prescription), but refused to register other properties solely because they were not listed in the 1936 Declaration, applying the 1974 case-law.

The ECtHR held that Turkey had violated Article 1 of Protocol No. 1 and emphasized that full restitution—not only compensation—was required, especially for properties with a religious character (monastery, chapel, cemetery), given their importance for the community's spiritual life.⁸²

⁷⁸ ECtHR, *Fener Rum Erkek Lisesi Vakfı v. Turkey*, [No. 34478/97](#), 2007.

⁷⁹ ECtHR, *Samatya Surp Kevork Ermeni Kilisesi, Mektebi Ve Mezarlığı Vakfı Yönetim Kurulu v. Turkey*, [No. 1480/03](#), 2008.

⁸⁰ ECtHR, *Foundation of the Greek Orthodox Church of Taxiarchis in Arnavutköy v. Turkey*, [No. 27269/09](#), 2022.

⁸¹ ECLJ, [Written observations](#) in the case *Arnavutköy Greek Orthodox Taxiarchis Church Foundation against Turkey*, [No. 27269/09](#), 17 June 2019.

⁸² ECtHR, *Bozcaada Kimisis Teodoku Rum Ortodoks Kilisesi Vakfı v. Turkey (No. 2)*, [No. 37646/03](#), 2009.

6.2.4. *Properties Seized Through Administrative Registration and Cadastral Redesign*

In *Foundation of the Mor Gabriel Monastery in Midyat v. Turkey* (2023), the Syriac Orthodox foundation of one of the oldest monasteries in the world contested the registration of several cemeteries in the name of the Treasury.⁸³ Although an earlier inquiry had confirmed that the cemeteries belonged to the monastery, later cadastral operations split and reclassified the land, including part of it as “shops” built by the authorities.

Domestic courts partly recognized the foundation’s rights for some parcels (the cemeteries), but refused for the one containing the shops, arguing that the foundation no longer possessed it at the time of the survey—without properly examining the prior situation. The ECtHR found a violation of Article 1 of Protocol No. 1 because the domestic procedure lacked adequate guarantees and failed to seriously examine a property closely linked to a minority’s religious life. The Court did not order restitution, but found serious procedural violations and opened the way for retrial at national level.⁸⁴

The *Yedikule Surp Pırgiç Ermeni Hastanesi Vakfı v. Turkey* (pending) case illustrates a similar pattern.⁸⁵ An Armenian hospital foundation seeks restitution of land explicitly listed in its 1936 Declaration. Despite a favorable administrative court ruling, the Directorate General of Foundations refused to implement it, relying on cadastral technicalities and reclassification to retain the property in the hands of the Treasury. The foundation argues, and the ECLJ supports, that this combination of administrative obstruction and non-execution of judgments violates property rights and is tainted by religious discrimination. The ECLJ supports full restitution, stressing that reopening domestic proceedings would only perpetuate systemic anti-Christian bias in the Turkish judiciary.⁸⁶

6.2.5. *Non-Restitution Due to Bad Faith and Systemic Judicial Obstruction*

In *Balat Rum Balino Kilisesi Vakfı v. Turkey* (pending), two historic Greek Orthodox foundations in Istanbul (Balino Church and Panayia Church) seek restitution or compensation for immovable properties expressly listed in their 1936 Declarations and covered by the restitution mechanisms of Law No. 5737.⁸⁷

The Directorate General of Foundations refused to register the properties in their names, despite the plain wording of the law. Administrative courts declined jurisdiction in substance, sending the foundations to civil courts instead, and the Constitutional Court ultimately dismissed their application on procedural grounds, without examining the merits.

For the ECLJ, this non-restitution of property duly declared in 1936 and protected by the new foundations law is only explicable by systemic discrimination against Christian minority foundations. The case reflects a broader pattern in which legal remedies exist on paper, but are neutralized in practice through bad faith, procedural maneuvers, and judicial unwillingness to enforce the rights of Christian communities.⁸⁸

⁸³ ECtHR, *Foundation of the Mor Gabriel Monastery in Midyat v. Turkey*, [No. 13176/13](#), 2023.

⁸⁴ ECLJ, “[ECHR: Turkey Illegally Expropriated a Monastery Built in the 4th Century](#),” 6 October 2023.

⁸⁵ ECtHR, *Yedikule Surp Pırgiç Ermeni Hastanesi Vakfı v. Turkey*, [No. 23343/24](#), pending.

⁸⁶ ECLJ, [Written observations](#) in the case *Yedikule Surp Pırgiç Ermeni Hastanesi Vakfı v. Turkey*, No. 23343/24, October 2025.

⁸⁷ ECtHR, *Balat Rum Balino Kilisesi Vakfı v. Turkey*, [No. 3984/21](#), pending.

⁸⁸ ECLJ, [Written observations](#) in the case *Balat Rum Balino Kilisesi Vakfı v. Turkey*, No. 3984/21, January 2025.



Current situation of the Phanar Greek Orthodox College

The Phanar Greek Orthodox College (Fener Rum Lisesi) is still officially a private minority school in operation, now reduced to roughly thirty pupils (as opposed to some 730 pupils about 40 years ago, and out of a total of around 300 students enrolled in Greek minority schools across Turkey). It traces its origins back to 1454, based on an arrangement between Patriarch Gennadios and Sultan Mehmed II. The present red-brick building, designed by Greek architect Konstantinos Dimadis, was constructed between 1881 and 1883.

In September 2025, the school announced that it would not accept new enrolments for the 2025–2026 academic year, signaling a dramatic decline but not a complete closure.⁸⁹ In October 2025, the Turkish Ministry of Education ordered the school to vacate the historic building within 90 days for seismic safety reasons, as the structure was deemed non-compliant with current anti-earthquake standards.⁹⁰ The estimated cost of the necessary reinforcement works exceeds €10 million, far beyond what the Fener Greek School Foundation can afford.

The school administration and the local community are therefore seeking a relocation solution; they have publicly rejected rumors of a definitive closure and instead speak of a temporary move.⁹¹ Meanwhile, the building opens to the public once a year for paid visits, which contributes to the impression that it is being progressively “museumified” rather than supported as a living educational institution.⁹² (Source: [Bianet](#))

⁸⁹ *Bianet*, “[Historic İstanbul Greek school sees no new enrollments this year](#),” 26 September 2025.

⁹⁰ *Tovima*, “[Uncertain Future for Istanbul’s Historic Phanar Greek School](#),” 13 October 2025.

⁹¹ *Athens Time*, “[Phanar Greek School Denies Reports of Closure or Shutdown](#),” 20 October 2025.

⁹² *Mavi Kadin*, “[Is Fener Greek Boys' High School active, is it visited, who can enter, when was it built?](#)” 7 December 2024.

6.3. The Absence of Free Elections for the Boards of Minority Foundations

In Turkey, non-Muslim communities must manage their churches, schools, cemeteries, hospitals, and other communal assets exclusively through community foundations (*cemaat vakıfları*). In principle, the boards of these foundations should be freely elected by members of the community (Article 6 of 2008 Law No. 5737). In practice, however, the State has long obstructed or tightly controlled these elections, severely undermining the autonomy and continuity of minority institutions.

Since 1968, the State has repeatedly interfered with the electoral processes of minority foundations. Elections were briefly reintroduced in 1991, but only for certain Greek Orthodox foundations and under heavy State supervision. From 1992 to 2006, elections were again frozen. A new regulation entered into force in 2008,⁹³ but it was abruptly annulled in January 2013, with no replacement—a move that effectively suspended all elections for nearly a decade. During this period, foundations operated with boards remaining long after the expiry of their mandates, and vacancies were filled not through elections but through State-appointed trustees.

A new regulation, published in June 2022, ostensibly allowed elections to resume.⁹⁴ However, minority representatives criticized it as even more restrictive than the 2008 framework: it introduced geographical boundaries that did not correspond to the actual distribution of communities, limited eligibility, and preserved strong oversight by the Directorate General of Foundations (*Vakıflar Genel Müdürlüğü*).⁹⁵ A further amendment in April 2023 adjusted certain provisions but did not remedy the underlying obstacles.⁹⁶

The Armenian community in Istanbul was finally able to hold elections in late 2022—for the first time in nine years—for school, church, and institutional boards.⁹⁷ This was a significant step but did not resolve the broader systemic problem. A separate regulation for the election of hospital boards—among the most influential minority institutions—has been repeatedly promised but remains unpublished, leaving these boards unelected and therefore under *de facto* State control.

The situation is particularly serious for the Balıklı Greek Hospital Foundation (*Balıklı Rum Hastanesi Vakfı*, BRHV), founded in 1794 and historically the wealthiest minority foundation. No board elections have been held since 1991, even though other foundations have undergone three election cycles in that time. In a judgment dated 19 December 2023, the Turkish Constitutional Court ruled that the prolonged suspension of elections violated the right to freedom of association under Article 33 of the Constitution and Article 11 of the ECHR. The Court ordered the VGM to take immediate steps to organize elections—a binding decision that the authorities have still not implemented.⁹⁸ This continued refusal demonstrates entrenched

⁹³ [Foundations Regulation](#), Turkish Official Gazette No. 27010, 27 September 2008.

⁹⁴ [Regulation on the elections to be held to determine the boards of directors of community foundations](#), Turkish Official Gazette No. 31870, 18 June 2022.

⁹⁵ *İnsan Hakları Derneği*, “[New election rules for minority foundations will prevent these foundations from holding free and democratic elections!](#)”, 23 June 2022.

Fides, “[Discontent and “discomfort” for the new regulations of the Foundations. The Armenian Patriarch appeals to Erdogan](#),” 27 August 2022.

⁹⁶ [Regulation amending the Foundations Regulation](#), Turkish Official Gazette No. 32167, 18 April 2023.

⁹⁷ *Bianet*, “[Armenians in İstanbul electing leaders after nine years](#),” 5 December 2022.

⁹⁸ *Nordic Monitor*, “[Turkey thwarts board election at Greek minority foundation despite court ruling](#),” 1 May 2025.

administrative obstruction, even in the face of judicial orders. The Ecumenical Patriarchate raised this violation before the UN Human Rights Council on 25 February 2025.⁹⁹

Community leaders have publicly denounced the systemic nature of the problem. In April 2024, Armenian Patriarch Sahak Maşalyan described the situation as “a problem of democracy and of law.”¹⁰⁰ Ecumenical Patriarch Bartholomew similarly condemned as a “great injustice” the decades-long inability of minority communities to renew their institutions, during which “many died, many left, and many of our institutions could not function properly, with the real danger that State-appointed representatives could replace the elected leaders of the community.”¹⁰¹

A clear illustration of this problem is the case *Mavrakis v. Turkey* (pending) before the European Court of Human Rights.¹⁰² The case concerns the refusal of the Turkish authorities to allow two Greek Orthodox priests to take up their duly elected positions on the boards of their own foundations—two churches (the Church of the Virgin Mary and the Church of Aya Konstantin) and the historic Phanar Greek College. These priests were elected in December 2011 and April 2012, yet the VGM refused to register their mandates. The ECLJ argues that Turkey’s interference unlawfully prevents Greek Orthodox clergy from managing their own foundations, undermining the community’s ability to govern the institutions essential to preserving its identity and faith, and reflecting a broader pattern of restricting Christian self-governance.¹⁰³

Moreover, under Article 7 of 2008 Law No. 5737, foundations whose boards cannot be formed for ten years may be declared “affiliated foundations” (*mülhak vakıf*) and placed under State trusteeship (“*mazbut*” status) by court order. This creates a direct incentive for the administration to block elections, thereby manufacturing the legal conditions for a State takeover.

6.4. State Trusteeship and the Dispossession of Community Foundations (“*Mazbut*” Status)

The system of *mazbut* trusteeship is one of the most powerful mechanisms through which the Turkish State has taken control of Christian and other non-Muslim community foundations. Under both the 1935 Foundations Law and the 2008 Law No. 5737, the General Directorate of Foundations (VGM) may unilaterally declare a foundation “disused” (*mazbut*). Once this status is imposed, the foundation loses its legal personality, its board is dissolved, and all of its immovable properties automatically become State property. The State may then exploit these assets commercially, with full fiscal privileges under Articles 26 and 77 of Law No. 5737.

Although intended to apply only to foundations that have genuinely ceased their charitable activity, *mazbut* status has frequently been used as a tool of expropriation and a means to erase the institutional presence of Christian communities. Foundations declared *mazbut* are pushed back into a pre-1912 legal situation in which they no longer exist as entities capable of owning property, managing institutions, or defending themselves in court. This mechanism therefore

⁹⁹ Written statement submitted by Ecumenical Federation of Constantinopolitans, [A/HRC/58/NGO/89](#), 25 February 2025.

See also: the Samatya Aya Analipsis Greek Orthodox Church Foundation: *Stockholm Center for Freedom*, “[Turkey violated rights of Greek Orthodox clerics, top court announces in reasoned decision](#),” 10 January 2025.

¹⁰⁰ *Agos*, “[Messages from Patriarch Maşalyan regarding hospital elections](#),” 2 April 2024.

¹⁰¹ *Orthodox Times*, “[Ecumenical patriarch at Valoukli retirement home church](#),” 4 August 2022.

¹⁰² ECtHR, *Mavrakis v. Turkey*, No. 12549/23, pending.

¹⁰³ ECLJ, [Written observations](#) submitted to the European Court of Human Rights in the case *Niko Mavrakis v. Turkey and 2 other applications*, No. 12549/23, November 2024.

results in a triple deprivation: loss of property, loss of self-governance, and loss of religious autonomy.

The **Maryakop Armenian Church Foundation**, belonging to the Armenian Patriarchate of Jerusalem, was declared *mazbut* in 1973, causing the loss of more than 100 properties—including real estate in Kuzguncuk, Altunizade, İstiklal Street, and Adana. When the Patriarchate attempted to challenge this reclassification, courts initially rejected the case on the basis of “lack of legal standing,” a recurring tactic used against non-recognized religious entities. In a landmark ruling, the Turkish Constitutional Court held that Maryakop had been unlawfully denied access to a court. The case was reopened, and the Ankara Administrative Court found that Maryakop had never ceased its activity and had been wrongly declared *mazbut*. Eventually, the VGM was forced to restore its legal personality—while paradoxically continuing to contest the decision. This case demonstrates how *mazbut* status functions as a *de facto* expropriation regime, how procedural barriers are used to silence minority claims, and how even a successful judgment does not guarantee effective restitution.¹⁰⁴

The **Fener Rum Patrikliği v. Turkey** case shows the international dimension of this problem.¹⁰⁵ The Ecumenical Patriarchate acquired the Büyükada Orphanage lawfully in 1902, but in 1997 the State declared the associated foundation *mazbut*. The VGM then brought proceedings—acting on behalf of the now State-controlled foundation—seeking to annul the Patriarchate’s title and transfer ownership to the State. The ECtHR found that this was not a mere land registry correction, but an unlawful deprivation of property based on an unforeseeable reinterpretation of the 1936 Declaration combined with *mazbut* trusteeship. The Court held that the only adequate remedy was full restitution, ordering Turkey to reinstate the Patriarchate’s ownership (implemented in 2012). The ECLJ emphasized that the case was part of a broader pattern of confiscations targeting the Greek Orthodox minority and that the Patriarchate’s lack of legal personality exacerbated the violation of its religious autonomy (Articles 6, 9, and 14).¹⁰⁶

The **Dimitri Bartholomeos Arhondoni and Others v. Turkey** case concerned the Saint Spyridon Monastery Foundation on the island of Halki, which the State reclassified as *mazbut* in 1967, even though the monastery continued to function as a place of worship.¹⁰⁷ The reclassification transferred all of its property to the State and eliminated its legal personality. In 2009, the Ecumenical Patriarchate requested reclassification as a community foundation, but the VGM refused, citing technicalities relating to outdated foundation lists. The applicants argued that this *mazbut* status was an unlawful interference with the internal autonomy of the Greek Orthodox Church. The ECLJ, acting as intervener, stressed that the autonomy of religious institutions is at the core of Articles 9 and 11 ECHR.¹⁰⁸ Although the ECtHR struck out the case at the applicants’ request in November 2024, it remains a key example of how *mazbut* reclassification operates as a mechanism of dispossession and State control over Christian foundations.

¹⁰⁴ Agos, “Critical development for the the Armenian Patriarchate of Jerusalem’s properties in Turkey: Maryakop Foundation acquires its legal entity,” 10 September 2024.

¹⁰⁵ ECtHR, *Fener Rum Patrikliği v. Turkey*, No. 14340/05, 2010.

¹⁰⁶ ECLJ, *Written observations* in the case *Fener Rum Patrikliği v. Turkey*, January 2008.

¹⁰⁷ ECtHR, *Dimitri Bartholomeos Arhondoni and Others v. Turkey*, No. 15399/21 (struck out).

¹⁰⁸ ECLJ, *Written observation* in the case *Dimitri Bartholomeos Arhondoni and Others v. Turkey*, April 2024.



Saint Spyridon Greek Orthodox Monastery on the island of Halki

The Saint Spyridon Greek Orthodox Monastery was built in 1868 by Arsenios Ganochoritis, a monk from Thrace. With the help of wealthy Greeks, he rebuilt it after it was destroyed during an earthquake in 1894. Ganochoritis was buried there at his request upon his death in 1906. Kyprianos Stylianidis, a priest from Kayseri, built a stone wall around the complex and made some repairs. Ecumenical Patriarch Athenagoras I restored the monastery in 1954. (Source: [Nomadic Niko](#))

7. Turkish Protestant Christians: a Community Without Legal Personality, Recognized Places of Worship, and Clergy Training

Protestant Christians face even greater obstacles than other Christian denominations in Turkey. First, Protestant communities are generally more active in publicly sharing their faith. Second, the conversion of Turkish Muslims to Christianity provokes strong resentment among authorities, who perceive it as a threat to national and religious identity. Converts often suffer social ostracism, family rejection, and public harassment. While repression once took the form of arrests, police raids, and physical intimidation, it has largely shifted toward legal and bureaucratic harassment—visa denials, property restrictions, surveillance, and administrative hurdles. Unlike the historic Christian minorities recognized under Lausanne, Protestant communities are also excluded from official interreligious dialogue mechanisms.

Protestants in Turkey are diverse. They belong to various traditions—Calvinist, Arminian, Anglican, Lutheran, Baptist—and have no centralized hierarchy. Most congregations are located in Istanbul, Ankara, and Izmir, and each church functions independently. Despite this fragmentation, Protestant communities grew steadily in the 1990s and began coordinating jointly through the Alliance of Protestant Churches (TEK). In 2009, the Association of Protestant Churches was established as the main representative body of the community; it maintains links with the World Evangelical Alliance.¹⁰⁹

The absence of legal personality remains a structural barrier. Turkish law does not recognize religious congregations as legal entities, forcing Protestants to register as associations or foundations. As of 2024, Protestant groups had established 21 foundations, 27 foundation branches, 36 associations, and 68 affiliated branches—giving legal status to 152 out of an estimated 214 Turkish-speaking congregations. An additional 100 congregations, mostly composed of Iranian refugees, worship in other languages.

This workaround is fragile: associations and foundations are not recognized as churches, and therefore cannot hold official worship licenses or benefit from related legal protections. Creating a foundation is expensive and administratively burdensome, discouraging smaller fellowships. Many therefore operate semi-legally as “representative branches” of existing entities.

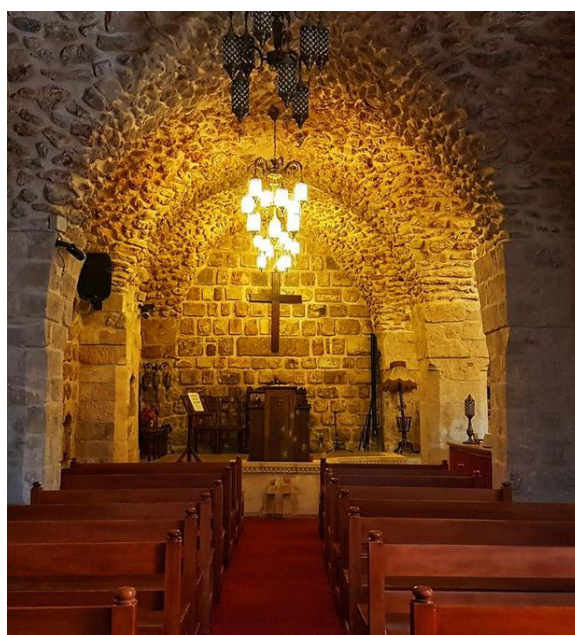
Unlike the historic Christian minorities, Protestants do not possess traditional church buildings. Out of 214 congregations, only 27 own an independent church building; 30 worship in non-independent spaces they own; 12 use historical churches; 123 rent commercial or residential premises; and 22 meet in private homes. This heavy reliance on informal or rented venues creates chronic insecurity. Because these locations are not legally designated as places of worship, congregations risk eviction, police pressure, and local hostility. Authorities often warn them that their activities are “illegal,” as seen in the threats of closure against the Salvation Churches Association in Lüleburgaz.¹¹⁰ Similarly, attempts to establish permanent worship spaces often meet bureaucratic obstruction. For example, in Diyarbakır, both the municipality and the governor rejected a Protestant church’s application for a building permit on the grounds

¹⁰⁹ [Protestan Kiliseler Derneği](#).

¹¹⁰ *Christian Daily International*, “[Hate crimes and opposition against Christians increase in Turkey](#),” 29 August 2025.

that “no space was available for a church”—even as new mosques and Qur’anic schools were being approved.¹¹¹

The Turkish State also prohibits the establishment of Protestant seminaries, and the absence of theological training within the country forces communities to rely on apprenticeship models, online instruction, foreign clergy, or study abroad. Yet since 2016, foreign Protestant pastors and missionaries have been increasingly targeted—through entry bans, residence-permit refusals, and security codes such as “N-82” and “G-87.”



Mardin Church, one of Turkey's oldest Protestant churches (Source: [Safarway](#))

8. Systematic Arbitrary Expulsions of Foreign Christians as a Tool to Undermine Domestic Christianity

Since 2016, Turkey has developed a systematic policy of expelling foreign Christians—pastors, missionaries, long-term residents, and even spouses of Turkish citizens—using opaque “national security” labels instead of arrests or prosecutions. The intelligence service (MIT) surveils Protestant networks and routinely brands foreign believers as spies¹¹² or agents of foreign influence.¹¹³ After the Brunson crisis, expulsions became the preferred tool: between 2019 and 2024, at least 132 foreign Christians were banned or expelled, and with family members counted, 303 people were affected.¹¹⁴ These individuals come from various national backgrounds—including Americans, South Koreans, Germans, Australians, Canadians, and Iranians.

¹¹¹ Ministry of Foreign Affairs of the Netherlands, *General Country of Origin Information Report on Türkiye*, February 2025.

¹¹² *Nordic Monitor*, “[Turkish intelligence conducted surveillance on Protestants, profiled them as threats to national security](#),” 13 June 2024.

¹¹³ *Nordic Monitor*, “[US, British visitors in Turkey scrutinized by Turkish intelligence for spying](#),” 1 July 2024.

¹¹⁴ [2024 Human Rights Violation Report](#), Prepared by the Association of Protestant Churches.

Turkey chiefly uses two administrative codes:

- N-82, which nominally requires prior authorization for entry but functions as a *de facto* ban;
- G-87, designating individuals as national-security threats with no evidence, judicial oversight, or possibility of appeal.

These expulsions deliberately weaken Protestant communities that depend on foreign pastors for worship, theology training, and leadership. The logic underpinning this approach is profoundly troubling. If foreign Christians are accused of committing “crimes” against Turkey, with whom could they possibly be committing them? Inevitably, suspicion is cast on the domestic Protestant community. This fosters an atmosphere of intimidation in which local believers fear surveillance, harassment, and even criminalization simply for exercising their faith in fellowship with foreigners. Cases like Joy Subaşıgüller—an American mother of three Turkish children who was deported solely to pressure her Turkish Christian husband—illustrate the human cost and the strategic aim: isolating Turkish converts and portraying Christianity as a foreign, suspicious presence.¹¹⁵

Courts rarely provide relief. Even when administrative courts overturn bans, authorities often refuse to comply. Several expelled families—including the Wilsons, the Zalmas, and David Byle—have turned to the Constitutional Court and the European Court of Human Rights.¹¹⁶ The ECLJ intervened in *Kenneth Wiest v. Turkey* (pending),¹¹⁷ an American resident since 1985 who was suddenly barred from re-entering Turkey.¹¹⁸

The ECtHR case *Cox v. Turkey* (2010) illustrates that this repression is not new.¹¹⁹ Norma Jeanne Cox, a U.S. citizen who lived in Turkey for decades, was repeatedly expelled and permanently banned after allegedly making, in an academic context, critical comments about the expulsion and genocide of the Armenians and the assimilation and exploitation of the Kurds (accusations labelled as “harmful activities”), and for attending Protestant services. The Court found that Turkey had violated her freedom of expression, using “national security” pretexts to silence her views and religious associations.

Taken together, these expulsions constitute a coherent State strategy: dismantling the leadership structures of Protestant churches, intimidating local believers, and stigmatizing Christianity as a foreign threat. The ECLJ argues in its interventions that effective remedies require lifting these bans and restoring the right to reside and minister, rather than sending cases back into a Turkish judicial system marked by structural discrimination against Christians.

9. Violations of Non-Refoulement and Persecution upon Return for Foreign Christian Converts

Turkey does not only expel Western missionaries: it also targets foreign Christian converts, especially Iranians and Afghans,¹²⁰ who face severe persecution because of their apostasy—

¹¹⁵ *Baptist Press*, “[Amid rising Christian persecution, Turkey denies visa to pastor’s American wife](#),” 30 June 2020.

¹¹⁶ ECLJ, “[Persecution of Foreign Christians in Turkey](#),” 28 October 2025.

¹¹⁷ ECtHR, *Kenneth Wiest v. Turkey*, No. 14436/21, pending.

¹¹⁸ ECLJ, [Written observations](#) in the case *Kenneth Arthur Wiest v. Turkey*, November 2024.

¹¹⁹ ECtHR, *Cox v. Turkey*, No. 2933/03, 2010.

¹²⁰ *Article 18*, “[What are the primary challenges facing Iranian Christian refugees in Turkey?](#),” 31 October 2023.

imprisonment, torture, or even execution—if returned to their countries of origin.¹²¹ Although Turkish law (Law No. 6458, Art. 4)¹²² and international treaties (1951 Refugee Convention, 1967 Protocol, Articles 3 and 5 ECHR) prohibit returning anyone to a place where their life or freedom is at risk, Turkish authorities routinely issue deportation orders, detain converts in removal centers, or pressure them into “voluntary departure.”

Protestant organizations report that asylum officials often treat conversions as illegitimate, question sincerity, and display hostility toward Christian claims. The contrast with the protection granted to millions of Syrian refugees is stark: while Muslim refugees benefit from collective protection, Iranians and Afghans who embrace Christianity face suspicion and forced removal.

The European Court of Human Rights has repeatedly condemned Turkey for violating non-refoulement—particularly involving Iranian Christian converts. The following judgments illustrate a clear pattern:

In *M.B. and Others v. Turkey* (2010), an Iranian family—recognized as refugees by UNHCR after converting to Christianity—was nonetheless deported to Iran in 2008.¹²³ The ECtHR found that Turkey exposed the family to a well-founded risk of persecution as Christian converts, and that no effective domestic remedy existed to challenge deportation. This ruling confirms that Turkey’s deportations of Christian converts directly breach the non-refoulement principle.

In *Ahmadpour v. Turkey* (2010) an Iranian woman who fled severe abuse, later converted to Christianity in Turkey, and was recognized as a refugee by UNHCR, was still detained for 20 months and threatened with deportation.¹²⁴ The ECtHR held that deportation would expose her to a real risk of torture, criminal prosecution (abduction of children, adultery), and persecution for conversion, and that her prolonged detention had no clear legal basis. UNHCR’s assessment was given decisive weight.

In *Z.N.S. v. Turkey* (2010), an Iranian woman previously imprisoned in Iran and later baptized in Istanbul was arrested in 2008 and held for months pending deportation.¹²⁵ The Court found that her conversion created a real and proven risk of ill-treatment in Iran, no lawful basis for her prolonged confinement, and an absence of speedy judicial review.

These cases show that Turkey systematically:

- disregards UNHCR refugee status, even when the risk of persecution is well-documented;
- ignores explicit claims of fear of torture or execution linked to conversion;
- fails to conduct individualized risk assessments;
- uses administrative detention arbitrarily, without clear legal basis;
- pressures converts to “voluntarily” return to countries where they face death.

Unlike Western expatriates—who may leave Turkey without personal risk—Iranian and Afghan converts face life-threatening consequences, making Turkey’s deportation policy a grave and repeated breach of international law.

¹²¹ [U.S. Religious Freedom Report: Iran \(2023\)](#).

¹²² [Law on Foreigners and International Protection, No. 6488, Article II \(2013\)](#).

¹²³ ECtHR, *M.B. and Others v. Turkey*, [No. 36009/08](#), 2010.

¹²⁴ ECtHR, *Ahmadpour v. Turkey*, [No. 12717/08](#), 2010.

¹²⁵ ECtHR, *Z.N.S. v. Turkey*, [No. 21896/08](#), 2010.

10. Legal Framework: Between Constitutional and International Promises and Structural Limitations

Despite strong constitutional guarantees and binding international obligations, the protection of Christians in Turkey remains largely theoretical. A strict, State-controlled reading of Lausanne, combined with structural discrimination and the systematic non-implementation of ECtHR and UN standards, creates a persistent gap between the law on paper and the reality on the ground. The following sections outline how this gap translates into recurring violations of religious freedom, property rights, legal personality, and minority protection.

10.1. For Each Violation Suffered by Christians in Turkey, a Triple Breach of the Law

Despite their shrinking numbers, Christians in Turkey remain—at least formally—protected by constitutional guarantees, international obligations, and the provisions of foundational treaties. In practice, however, these protections are narrowly interpreted and inconsistently applied, especially for Christian communities that the State refuses to recognize. The Turkish State's responsibility for the precarious situation of Christians amounts to a triple violation of the law.

Every major restriction faced by Christians—whether related to worship, clergy training, proselytism, or internal church governance—constitutes a breach of Article 24 of the Constitution, Article 9 of the European Convention on Human Rights (ECHR), and Article 18 of the International Covenant on Civil and Political Rights (ICCPR). The pattern is one of structural anti-Christian discrimination, contrary to Article 10 of the Constitution, Article 14 ECHR, and Article 26 ICCPR.

Expropriations, cancellation of title deeds, non-recognition of ownership, and the imposition of *mazbut* (State trusteeship) violate the right to property guaranteed by Article 35 of the Constitution and Article 1 of Protocol No. 1 to the ECHR. These practices systematically undermine the autonomy and survival of Christian foundations.

The refusal to grant legal personality to churches and patriarchates deprives Christian communities of the ability to administer institutions, own property, or appoint leaders. This violates Article 33 of the Constitution, Article 11 ECHR, and Article 22 ICCPR.

Expulsions of pastors, missionaries, family members of Turkish Christians, and foreign Christian converts—often imposed without individual justification—constitute violations of private and family life under Articles 20 and 41 of the Constitution, Article 8 ECHR, and Article 17 ICCPR.

In most of these cases, Christians are also deprived of effective remedies and fair trial guarantees, violating Article 40 of the Constitution, Articles 6 and 13 ECHR, and Article 2 ICCPR, which requires States to ensure accessible and effective mechanisms of redress.

A further structural problem arises from Turkey's restrictive interpretation of the 1923 Treaty of Lausanne. Although Lausanne protects non-Muslim minorities and the integrity of their religious and charitable institutions (Articles 37–45), Turkey applies these guarantees exclusively to the three communities it chooses to recognize—Armenians, Greeks, and Jews. All other Christian groups—Assyrian-Chaldean, Syriac, Latin Catholic, Protestant—are excluded, despite their historical and contemporary presence. This interpretation contradicts the

universal scope of Article 27 ICCPR, which protects all ethnic and religious minorities without exception.¹²⁶

As a result, unrecognized communities remain without legal personality, are unable to establish schools or seminaries, and cannot secure their places of worship or property against arbitrary interference. Lausanne—intended as a protective instrument—is applied in practice in a way that institutionalizes religious inequality, limiting minority rights to the groups the State is willing to acknowledge.

Freedom of expression, formally protected by Article 26 of the Constitution, Article 10 ECHR, and Article 19 ICCPR, is also severely restricted when exercised by Christians, whether in preaching, evangelization, or teaching. This freedom is constrained by Article 14 of the Constitution, which prohibits exercising any constitutional right—including religious expression—if authorities deem it harmful to the “indivisible integrity of the State” or the “democratic and secular order.” This broadly defined clause has repeatedly been used to suppress Christian activities considered—often arbitrarily—to endanger public order or national unity.

Additional restrictions stem from the Turkish Penal Code, including Article 219, which criminalizes public statements by religious leaders deemed to “ridicule” State institutions, and Article 301, which punishes “denigrating the Turkish Nation or the State.” These vague and expansively interpreted provisions have been deployed against pastors, converts, and missionaries, and create a pervasive chilling effect on the public expression of Christian faith.

These international human-rights commitments are not abstract: they are interpreted and monitored by concrete institutions—the European Court of Human Rights, the Council of Europe, the UN Human Rights Committee, the UN Human Rights Council, and, at the political level, the European Union in the framework of accession conditionality.

10.2. European Convention on Human Rights (ECHR) – Council of Europe

Turkey remains one of the most condemned and most non-compliant States under the European Convention on Human Rights. As of 31 December 2024, it accounted for 35.8% of all pending cases before the ECtHR, with 67 violations in 73 judgments issued that year. Over 440 cases remain under enhanced supervision for non-implementation.¹²⁷

European institutions repeatedly highlight patterns directly affecting Christians:

- Systemic failure to implement ECtHR judgments, including landmark rulings.
- Persistent violations of freedom of religion, property rights, and association.
- Discrimination and hate speech against non-Muslim minorities, documented by ECRI (2025), particularly targeting Christians, Alevis, and Jews.¹²⁸

¹²⁶ United Nations Treaty Collection, [Declarations and Reservations](#) of Turkey to the International Covenant on Civil and Political Rights, New York, 16 December 1966.

¹²⁷ [Annual report 2024](#) of the European Court of Human Rights.

Supervision of the execution of judgments of the European Court of Human Rights 2024 - [18th Annual Report](#) of the Committee of Ministers (2025).

[Turkey Press Country Profile](#), last updated in September 2025.

¹²⁸ European Commission against Racism and Intolerance (ECRI), “[ECRI Report on Türkiye](#),” adopted on 18 June 2023, published on 12 June 2025.

- Legal personality denied to religious communities—criticized by the Venice Commission, which finds Turkey’s model incompatible with Articles 9 and 11 ECHR.¹²⁹
- Continuing refusal to allow the Orthodox Patriarchate to use the title “Ecumenical”.
- Ongoing failure to return *mazbut* (confiscated) foundations, condemned by PACE Resolution 1704 (2010).

Overall, Council of Europe bodies consider Turkey’s treatment of Christian minorities to reflect structural, systemic non-compliance with the Convention.

10.3. European Union – Accession Criteria

As a European Union candidate State, Turkey is obligated to comply with the Copenhagen criteria, particularly the rule of law, fundamental rights, and minority protection.¹³⁰

The 2025 European Commission Report¹³¹ highlights that:

- No progress has been made on aligning human-rights legislation with the ECHR.
- Legal personality for non-Muslim and Alevi communities remains unresolved.
- Christian places of worship continue to face registration obstacles, vandalism, and weak police protection.
- Halki Seminary remains closed; concerns persist about Hagia Sophia and Chora.
- Foreign Protestant pastors are still deported or denied residence.
- Education is not religiously neutral: compulsory Islamic instruction persists despite ECtHR rulings.
- Discriminatory property practices continue (e.g., Mor Gabriel, Bozcaada, Gökçeada).
- Hate crimes and hate speech against Christians, Armenians, Syriacs, and Greeks remain inadequately investigated.

The European Parliament (2025)¹³² bluntly concludes that Turkey shows a “clear lack of political will” to implement reforms and emphasizes:

- Recognition of the Ecumenical Patriarchate and the reopening of Halki.
- Effective protection of Christian heritage (Hagia Sophia, Chora, Sumela).

¹²⁹ [Opinion](#) on the Legal Status of Religious Communities in Turkey and the Right of the Orthodox Patriarchate of Istanbul to use the adjective “Ecumenical” adopted by the Venice Commission at its 82nd Plenary Session (Venice, 12-13 March 2010).

¹³⁰ The Treaty on European Union sets out the conditions (Article 49) and principles (Article 6(1)) to which any country wishing to become a member of the European Union (EU) must conform. Certain criteria must be met for accession. These criteria (known as [the Copenhagen criteria](#)) were established by the Copenhagen European Council in 1993 and strengthened by the Madrid European Council in 1995.

¹³¹ [Türkiye 2025 Report](#), Accompanying the document COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS, 2025 Communication on EU enlargement policy.

¹³² European Parliament resolution of 7 May 2025 on the 2023 and 2024 Commission reports on Türkiye ([2025/2023\(INI\)](#)).

- Free elections for Christian foundations.
- Protection against discrimination and hate crimes.

The European Parliament considers these deficiencies incompatible with the European Union values.

10.4. ICCPR – UN Human Rights Committee and Universal Periodic Review

In its 2024 Concluding Observations,¹³³ the UN Human Rights Committee expresses deep concern regarding:

- Restrictions on unrecognized Christian communities: no legal personality, obstacles to registration, inability to own property.
- Discriminatory treatment of Protestants and Jehovah’s Witnesses.
- Entry bans and deportations of foreign pastors and Christian converts.
- Lack of recognition of Alevi worship.

The Committee calls on Turkey to:

- Ensure freedom of religion for all, without Lausanne-based discrimination.
- Amend discriminatory legislation (including the 1935 Law on Foundations).
- Cease restrictions on places of worship and movement of foreign clergy.

During the 2025 Universal Periodic Review (UPR),¹³⁴ Turkey highlighted isolated positive steps (e.g., restoration of certain churches, Mor Efrem project), but reaffirmed its restrictive doctrine that only Armenians, Greeks, and Jews count as “minorities”—thus justifying the continued exclusion of Catholics, Syrians, Chaldeans, and Protestants.

Numerous States issued strong recommendations:

- Grant legal personality to religious communities.
- Reopen Halki and allow non-Muslim communities to elect their leadership.
- Protect Hagia Sophia and Chora as intercultural spaces.
- Combat hate speech and discrimination.
- Withdraw Turkey’s reservation to ICCPR Article 27 (minority rights).
- Comply with ECtHR rulings on Christian property.

NGOs, including the ECLJ,¹³⁵ reported that religious nationalism and Islamist policies have placed immense pressure on Christians, with laws and administrative practices deliberately targeting their institutions and activities.

¹³³ Human Rights Committee, Concluding observations on the second periodic report of Türkiye, [CCPR/C/TUR/CO/2](#), 28 November 2024.

¹³⁴ [Fourth Cycle of the Universal Periodic Review – Türkiye](#).

¹³⁵ ECLJ, [Universal Periodic Review 2024 of Turkey](#).

11. Recommendations

11.1. Recommendations to the Turkish State

Legal Framework

- Recognize the legal personality of all religious communities, including Protestant, Syriac, Chaldean, and Catholic churches, in line with Council of Europe and Venice Commission standards.
- Reform legislation to allow direct registration of churches and places of worship, without requiring them to operate through foundations or associations.
- Adopt an inclusive interpretation of the Treaty of Lausanne, ensuring equal treatment of all religious communities.
- Explicitly criminalize hate speech and hate crimes targeting Christians and other religious minorities.

Freedom of Religion

- Guarantee effective enjoyment of the rights protected under Article 24 of the Constitution, Article 9 ECHR and Article 18 ICCPR.
- End restrictions on evangelization, distribution of religious literature, and prayer meetings held in rented facilities.
- Halt the practice of administrative expulsions, entry bans, and refusals of residence permits targeting pastors and missionaries.
- Ensure protection for Christian converts against administrative and police pressure.

Religious Education and Clergy Training

- Reopen the Halki Theological Seminary and authorize theological institutes for other Christian communities.
- End the State monopoly on religious instruction in schools and provide a non-confessional alternative for non-Muslim pupils.

Property and Minority Foundations

- Fully restore confiscated properties, including those placed under *mazbut* trusteeship.
- Resolve outstanding cases—such as the Syriac monastery of Mor Gabriel—and accelerate fair restitution.
- Guarantee free and independent elections in minority foundations, without intervention from governors or the Directorate General of Foundations.

11.2. Recommendations to the Council of Europe

- The Committee of Ministers should increase political pressure on Turkey to implement ECtHR judgments regarding religious foundations, should launch infringement proceedings under Article 46(4) ECHR for systematic non-compliance, and should require Turkey to present a binding legislative reform roadmap.

- The Venice Commission should update the 2010 Opinion on legal personality and assess recent developments (expulsions, obstacles to clergy training, administrative practices), and should draft a model law for the legal recognition of religious communities in Turkey.
- ECRI should maintain enhanced monitoring of hate speech and discrimination targeting Christians and should request that Turkey adopt a national strategy against anti-religious violence.
- Parliamentary Assembly (PACE) should adopt an updated resolution to follow Resolution 1704 (2010) and should send a parliamentary fact-finding mission on the situation of Christians.

11.3. Recommendations to the European Union

- Prioritize freedom of religion in EU–Turkey dialogue.
- Condition progress in customs union modernization, visa liberalization, or sectoral cooperation on measurable reforms regarding legal personality of churches, end of foreign Christians expulsions, restitution of Christian properties.
- Use IPA funds to support documentation of religious freedom violations and security measures for Christian sites.
- Finance restoration projects of Christian heritage with independent monitoring mechanisms.

11.4. Recommendations to the United Nations

- The Human Rights Council (HRC) should request that Turkey adopt a national implementation plan for ICCPR recommendations on religious freedom, and should call for an immediate end to expulsions and administrative targeting of foreign Christians.
- The UN Special Rapporteur on freedom of religion or belief should be invited for a country visit and should document specifically obstacles to registering Protestant worship places, lack of legal personality for churches, barriers to theological training, discrimination in minority foundations, deportations of foreign Christians.
- The UPR Working Group should recommend explicitly legal recognition of all churches; comprehensive property restitution; protection of converts; abolition of administrative tools used for expulsions (codes N82, G87, and foreigner-tracking systems).
- The UNESCO should request an evaluation of the status of Christian heritage sites, including Hagia Sophia, Chora, and Syriac monasteries.

12. Conclusion

Over the past century, the situation of Christians in Turkey has steadily deteriorated. Communities that were once integral to the cultural, religious, and historical fabric of Anatolia have been reduced to a fragile remnant. Their disappearance is not the product of a single event but the cumulative result of restrictive legislation, administrative obstruction, property confiscations, denial of legal personality, and—more recently—arbitrary expulsions of clergy, missionaries, and converts.

Today, Christianity in Turkey survives in a legal and political environment shaped by a narrow interpretation of the Treaty of Lausanne, a model of State supervision over religious life, and a national narrative that presents Sunni Islam as the primary marker of Turkish identity. This framework continues to marginalize all Christian communities—whether recognized under Lausanne or not—by denying them the institutional, demographic, and legal conditions necessary for their continuity.

If Turkey genuinely intends to uphold its constitutional commitment to secularism, it must abandon policies that treat Christian institutions as historical relics rather than living communities. This requires:

- recognizing the legal personality of all churches;
- restoring confiscated properties and ending the misuse of *mazbut* status;
- ensuring free elections within minority foundations;
- reopening theological schools such as Halki;
- ceasing arbitrary expulsions and entry bans;
- protecting places of worship and prosecuting hate crimes;
- and aligning domestic law with ECtHR and ICCPR standards.

These reforms are not peripheral. They are essential to preserving what remains of Turkey's Christian heritage and to bringing the country into genuine compliance with its international obligations.

The European Centre for Law and Justice will continue to support this process. Through interventions before the European Court of Human Rights, submissions to UN mechanisms, representing individuals who face persecution from the Turkish government, legal analysis, and documentation of violations, the ECLJ seeks to defend the rights of Christian communities in Turkey and to ensure that their future is protected by the rule of law rather than shaped by administrative discretion or historical erasure.

List of briefs submitted by the ECLJ to the ECtHR

- ECLJ, [Written observations](#) in the case *Fener Rum Patrikliği v. Turkey*, January 2008.
- ECLJ, [Written observations](#) in the case *Arnavutköy Greek Orthodox Taxiarchis Church Foundation against Turkey*, 17 June 2019.
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