

CRISIS ANALYSIS – SYRIA

RESEARCH SERIES ON THE MEDIUM-TERM IMPACT OF THE 6 FEBRUARY EARTHQUAKES  
ON NORTHWEST SYRIA



## Volume 3.

### AID GOVERNANCE IN NORTHWEST SYRIA

Examining changes to aid policy by local authorities  
following the February earthquakes

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*Photo: Rescuers and residents search through the rubble of collapsed buildings in Harem, Idlib, February 2023 (Source: VOA News).*

*Cover photo: An aerial view of collapsed buildings as search and rescue efforts continue in Idlib, Syria on 13 February, 2023. Muhammed Said/Anadolou Agency via Getty Images.*

## KEY TAKEAWAYS

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- The Syrian Salvation Government’s establishment of the Directorate for the Affairs of Earthquake Victims has not yet affected any significant changes to the Ministry of Development and Humanitarian Affairs’ authority over earthquake response projects, but aims to centralize information and speed up data coordination.
- The Directorate’s information management approaches and technical capacity remain opaque. Poor practices with regard to data collection, verification, and analysis could present space for misrepresentation or misinterpretation of earthquake-related data that could impact the location, scope, or type of aid programming.
- In northern Aleppo, aid approval processes remain largely unchanged. However, the Syrian Interim Government’s reliance on authority from Turkey created delays in its immediate response to the earthquake, resulting in an uncoordinated approach and presenting additional space for favoritism within aid distribution.

## INTRODUCTION

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In each phase of the Syrian conflict, aid actors have had to adapt to programming disruptions and changes to access and authority. These have included further bureaucratic hurdles and risks of aid interference or diversion. The February earthquakes presented a tragically unique situation where similar issues could feasibly arise: both governing and aid actors alike were confronted with a surge in humanitarian need and a subsequent influx of foreign aid across different localities of northwest Syria. These developments posed heightened risks for aid interference while also testing local authorities’ capacity to coordinate amid greater needs and conflicting priorities.

In this third report in the Northwest Syria Series, Mercy Corps’ Crisis Analysis – Syria (CA – SYR, formerly HAT) aims to identify how – if at all – the earthquake impacted governing actors’ policies toward aid actors in northwest Syria. This research aims to understand how the environment for local aid governance in northwest Syria has changed since the earthquake. Through an assessment of processes, this report compares the bureaucratic environment for aid projects within areas controlled by the Syrian Salvation Government (SSG) in Idleb and the Syrian Interim Government (SIG) in northern Aleppo.

The SSG’s establishment of the Directorate for the Affairs of Earthquake Victims in Idleb presents a step in long-standing attempts by the SSG to further institutionalize its presence with international donors, although questions remain about the Directorate’s technical capacity and professionalism. In northern Aleppo, approaches by the SIG remain largely unchanged, presenting limitations in the SIG’s ability to react quickly and coherently to a drastic increase in need.

## CENTRALIZATION OF GOVERNANCE IN IDLEB



The SSG has continued to expand and evolve its policies toward aid actors since the establishment of the Ministry of Development and Humanitarian Affairs (MDHA) in late 2019. Consisting of six directorates, the MDHA is the main entry point for humanitarian agencies seeking program implementation in SSG-controlled areas.<sup>1</sup> Since its creation, aid organizations must receive approval directly from the MDHA, based on the project sector, targeted location, and/or the expected beneficiary group. First, an organization must apply to the MDHA's Project Management Unit within the Department of Coordination and Direction to receive a project implementation license. Once this license is received, they are referred to the relevant sub-directorate depending on the project's programming sector and location.

In parallel, Humanitarian Affairs offices embedded within local councils send beneficiary lists and humanitarian needs data from the community level directly to the MDHA, which the latter assesses to determine where to channel aid support. Importantly, local councils are under the jurisdiction of the Ministry of Local Administration and Services (MLAS) while local Humanitarian Affairs offices operate under the jurisdiction of the MDHA. This tends to make them operate as local extensions of the MDHA as opposed to elements of local councils. This has not always been the case in Idleb – the Humanitarian Affairs offices were previously more directly integrated into local councils and served as the main authority for humanitarian activities before the SSG's emergence in 2019.

Since 2019, decision-making authority regarding aid projects has been largely centralized with the MDHA, while the MLAS and local councils operate in parallel. Past research by CA – SYR [found](#) confusion among humanitarian actors regarding the respective mandates of the MDHA and MLAS for humanitarian work, as well as in the shift of jurisdiction from local Humanitarian Affairs offices to the MDHA with the latter's establishment in 2019. This confusion has also contributed to fears that the centralization of aid authority with the MDHA could create new space for interference in aid programming.

### Earthquake response in Idleb

In the wake of the February earthquake, the SSG facilitated coordination and mobilization of immediate support through the creation of the Emergency Response Committee and later the Directorate for the Affairs of Earthquake Victims (or Earthquake Affairs Directorate). Both entities were established with the stated aim of managing coordination and responding to the extreme increase in needs in the days following the earthquake. While the Emergency Response Committee's activities were generally limited to coordination across different SSG ministries' response in the immediate aftermath, the Earthquake Affairs Directorate is still operating and appears to further institutionalize the role of the MDHA in aid coordination and programming in Idleb.

<sup>1</sup> The ministry consists of six directorates, two of which directly interact with humanitarian agencies: the Department of Coordination and Direction and the General Directorate of Humanitarian Affairs sub-directorates.



At the ministerial level, the SSG [formed](#) the Emergency Response Committee on 6 February which included key SSG ministries (including the MDHA) and representatives from Hayat Tahrir al-Sham (HTS). The Committee had the stated purpose of coordinating response efforts across different sectors, from rescue efforts to damage assessments and aid distribution. The Committee's activities in the days following the earthquake were heavily covered by local media, with visits to affected areas by SSG ministers and a similar visit by Abu Mohammad al-Jolani – the General Commander of HTS. However, beyond such visits and the resulting media attention, the Committee did not appear to play a distinct or authoritative role in post-earthquake decision-making. While the Committee has not officially announced its suspension, there has been little public indication of activities in the last two months.

The Directorate for the Affairs of Earthquake Victims was [established](#) a week after the earthquake on 12 February to collect data on affected residents and structures, identify orphans, and assess humanitarian needs. The Directorate operates under the jurisdiction of the MDHA which finances it.

Still in operation at the time of writing, the Directorate is the main source of data on earthquake-related needs for the MDHA. Statistics are collected and shared on a public [dashboard](#) across four different categories: 1) human and material damage; 2) the geographical distribution of new shelters for internally displaced people; 3) needs in shelters; and 4) aid distribution in shelters. However, the latter data stream appears to only reflect distribution in the days immediately following the earthquake. Residents were [encouraged](#) to register with the Directorate to be eligible for humanitarian assistance, indicating a reliance, at least partially, on self-reporting.

Local sources report that the Directorate's involvement in aid governance is largely limited to information management to facilitate aid coordination. It does not appear to exercise a high degree of authority over implementing organizations, the MDHA, local councils, or other elements of the SSG. Decision-making regarding project approvals still lies with the MDHA which assesses the data collected by the Directorate (in combination with other data streams, such as data shared by local councils' Humanitarian Affairs offices) to determine need and direct aid assistance. Once an earthquake-related project is approved, the implementing partner is referred to the Earthquake Affairs Directorate which assists in providing beneficiary lists and other relevant data, and coordinating implementation.

In parallel, Humanitarian Affairs offices of local councils continue to coordinate with the MDHA as before the earthquake, while also providing the Earthquake Directorate office with data. While the Earthquake Affairs Directorate focuses on earthquake-specific data streams and projects, the Humanitarian Affairs offices share data on a wider breadth of events for NGOs in Idlib.

## Opportunities and limitations of the Directorate for the Affairs of Earthquake Victims

Comparing the role of the Earthquake Affairs Directorate with [previous processes](#) for data sharing shows it was likely created to help streamline the previously convoluted coordination of data between the SSG and NGOs. Prior to the earthquake, NGOs would need to meet with an Area Coordinator to get the required statistics, including beneficiary lists and needs assessments, which the sub-directorate Statistics Office sources. This data is now provided directly by the Earthquake Affairs Directorate. The centralization of earthquake-related data should enable faster response times in a period where needs are particularly high.

However, the Earthquake Affairs Directorate's methodology for collecting, storing, and analyzing data is highly opaque. Initial research was unable to clarify the Directorate's organizational capacity, with estimates that it employs anywhere from 100 to over 200 employees. Local reports also indicate that the Directorate employs individuals from other governmental offices of the SSG – seconding SSG employees,

and leaving gaps either in other SSG ministries or within the Directorate. Its technical capacities in quantitative data collection, data safety practices, and other necessary components of information management were also not immediately evident through research and should be explored and specified.

The establishment of the Earthquake Affairs Directorate has not appeared to interfere on behalf of the MDHA in earthquake response projects. However, the opacity of information management policies presents space for possible manipulation of the data presented on the Directorate's platform which could influence decision-making regarding access, and prioritization of certain projects or implementers. Further research into the Directorate's methods for gathering beneficiary lists, conducting data collection, and storing sensitive data could help clarify the strength or limitations of such processes.

## Reconstruction governance

Beyond aid coordination, the SSG has stated its intention to become more closely involved in reconstruction following the earthquake. On 20 May, the SSG [announced](#) that a construction permit for residents and the public sector would be required for any earthquake-related repairs. Local reports indicate the permit would be required for even small-scale reconstruction such as home repairs, reconnecting sewage lines, and other activities constituting rehabilitation. The statement inferred that NGOs would also be required to seek approval although this was not directly cited. The permits will be issued by the MLAS which, as mentioned previously, also oversees the operations of local councils. These policies build on a [2020 decision](#) by the SSG to require permits for construction work to be approved by the MLAS, justified at the time as an effort to organize construction work and limit the space for disputes.

Later on 22 May, the SSG announced the [establishment](#) of the Directorate for Engineering Affairs. Overseen by the MLAS, this new Directorate will conduct audits of engineering plans and projects across different sectors and issue engineering licenses. The decision reportedly transfers some authority previously held by local councils to the new Engineering Directorate, as the primary authority to carry out technical audits and quality control of construction activities. These two parallel decisions further concentrate authority to more centralized actors within the SSG, limiting the role of local councils. It also indicates that the SSG is positioning the MLAS to play a key role in post-earthquake recovery in Idlib.

These decisions are likely important for ensuring oversight on reconstruction, particularly in heavily damaged areas where efforts could quickly become disorganized, increasingly unregulated, or present risks to housing, land, and property rights (HLP). However, they could also enable new sources of income for the MLAS, or present space for interference if the approval of construction permits, or the work of the Engineering Directorate overreaches its mandate, or becomes preferential. Moreover, aid actors may face renewed confusion as they navigate the operational mandates of both the MDHA and MLAS, which have been found to be contradictory in the past.

# DECENTRALIZATION IN NORTHERN ALEPPO



Aid governance in northern Aleppo is notably different than in Idlib, and processes for approving and implementing aid projects do not appear to have changed drastically following the earthquake.

The establishment of the Turkish-backed Syrian Interim Government (SIG) meant all major decisions must be approved by governors in Turkey. NGOs must go through several steps to implement a project in northern Aleppo, beginning first with registration and approval by Turkish authorities in Turkey. Then, NGOs must register and be approved by the SIG Directorate of Social Affairs and Labor in Syria. Afterward, they must coordinate with the relevant local council as well as AFAD – the Turkish government’s disaster management agency operating under the Ministry of Interior – which maintains a presence in Turkish-controlled areas of Syria. If the local councils approve the project, they provide beneficiary lists to the organization and the project is implemented under the supervision of AFAD. This step-by-step process parallels broader governance approaches in northern Aleppo, where decision-making by local councils is [overseen](#) by officials in neighboring Turkish governorates.

Table 1: Geographic breakdown of Turkish oversight in northern Aleppo.

	Turkish governorate authorities			
	Kilis	Gaziantep	Hatay	Sanliurfa
Local councils	Azaz	Al-Bab	Afrin	Ras Al Ain
	al-Maraa	Qabasin	Jandairis	Tal Abyad
	Akhtrein	Bazagha	Ma'btali	
	Suran	Jarablus	Sheikh El-Hadid	
	Ar-Ra'ee	Ghandorah	Sharan	
		Bulbul		
		Raju		

Source: [Fares Halabi](#) Middle East Institute

## Earthquake response in northern Aleppo

The immediate earthquake response in northern Aleppo was hampered by the delegation of local authority to Turkey. Local councils were slow to respond in the days following the earthquake after receiving

minimal direction from Turkish counterparts who were responding to their own needs closer to home, according to local sources. Limited mobilization was particularly palpable in reports from Jandairis at the time, an area that bore the brunt of earthquake damage and which is [managed](#) by the Hatay governorate in Turkey, which also sustained a high degree of earthquake damage.

Factions affiliated with the Syrian National Army (SNA) distributed support using their own resources, including providing vehicles for rescue efforts and building tent shelters for IDPs. According to local sources, factions tended to channel support primarily to their respective areas of control during this time. Gaps by local councils were largely filled after a few days, when they began opening public facilities for IDPs, providing fuel for rescue efforts, and distributing aid. However, the initial delay presented space for ad hoc mobilization and the possibility of aid diversion in lieu of a more centralized, coordinated response from the SIG.

## CONCLUSION

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No direct cases of interference by governing actors in northwest Syria were observed through this research; while this may be encouraging to humanitarian stakeholders concerned with potential diversion, influence, or interference, the finding does not preclude the possibility of highly localized or small-scale interference.

Furthermore, assessing the differences in governance approaches in northern Aleppo and Idlib highlights how the two regions present different opportunities for manipulation or aid interference to take place. With the SIG overseen by authorities further away in Turkey, local councils are more likely to be co-opted by locally influential groups such as armed factions, continuing the forms of aid diversion typically witnessed in armed conflicts. In Idlib, the SSG's centralization of aid-related processes creates opportunities for heightened coordination but it creates protocols that, if left unchecked, could enable the SSG to interfere more in aid programming in ways similar to traditional state actors. As such, it is neither wholly positive nor negative that the SSG is initiating new processes for aid actors for the post-earthquake recovery. However, clarifying the methodologies used to collect data and make judgments with regard to needs, priority locations, and even construction licenses can improve transparency and reduce the risks of manipulation.

These two different approaches to local governance likewise present considerations in the event of future emergencies that would require mobilization across different sectors and actors. In northern Aleppo, local councils are less equipped to handle complex emergencies, and thus delays could be expected in future responses – particularly in response to environmental emergencies also occurring in Turkey or events perpetrated by the Turkish government. These delays would exacerbate humanitarian needs while giving rise to ad hoc mobilization of armed groups, NGOs, and local residents.



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The Crisis Analysis – Syria team (formerly HAT), was established in Beirut in March 2015 in response to the collective challenges facing the remote humanitarian response in Syria. CA-SYR's most important function is to collect and analyze data and information. Since 2015, our analysis has provided a forward-looking template for international interventions in Syria, and facilitated an increasingly adaptive, integrated, and ultimately impactful international response to the conflict. CA-SYR is a team within Mercy Corps, and is part of the Mercy Corps response to the Syrian crisis.

