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# 1. Introduction

Turkey and the EU was linked by an Association Agreement since 1963. In December 1999, the European Council granted the candidate status to Turkey. In 2005, the EU adopted the negotiating framework and officially the accession negotiations were opened on 3 October 2005.

Turkey continued to align with the EU *Acquis* since 2005. So far, 16 chapters out of 35 were opened to negotiations and only one chapter (Chapter 25 - "Science and Research") was closed provisionally. Regarding the trade relations, the EU remains Turkey's number one import and export partner while Turkey is the EU's 4th largest export market and 5th largest provider of imports.

Turkey also participates in Erasmus+, Horizon 2020, Competitiveness of Enterprises and Small and Medium-sized Enterprises-COSME, Customs 2020, Fiscalis 2020, European Environment Agency, Employment and Social Innovation-EASI, European Monitoring Centre for Drugs and Drug Addiction and since 2016 Civil Protection Mechanism. In December 2015, Turkey adopted the IPA II.

Chapter 15 on "Energy" and Chapter 27 on "Environment and Climate Change" are necessary to create capacities at national and local level while considering global environmental challenges. As of today, humanity is struggling with key challenges such as environmental degradation, the loss of biodiversity, climate change, climate justice, food security, water and air pollution, inequality between and within countries, corruption, non-transparent data, unsustainable consumption patterns, national economies heavily depended on fossil fuels, and the like. There is a scientific consensus that climate change is due to human activities. Carbon dioxide level in the Earth reached 405 ppm in September 2018.<sup>1</sup> In addition, the global temperature is 1 degrees warmer than pre-industrial period. The two negotiation Chapters with the EU advocate an integrated policy structure for the longest time. Alignment with the two Chapters will contribute to moving Turkey towards embracing a better environmental performance.

## 1.1. Environmental Status in Turkey

So far, environmental status in Turkey seems to have some inroads. Particularly, Turkey has made considerable progress in line with the EU legislation as part of the EU accession process. Turkey has achieved progress in noise control and waste management in general. However, additional legislative and national efforts need to be made in the field of adaptation to climate change, mitigation, nature protection, industrial emissions, water management, Environmental Impact Assessment (EIA), and effective public participation in environmental issues.

Turkey is also a party to key institutions of the EU such as Council of Europe since 1949 as well as international conventions. However, Turkey has not yet ratified Paris Agreement. In the latest Climate Change Performance Index, Turkey is described as "very low performance" and is ranked 50<sup>th</sup> out of 60 countries<sup>2</sup>. It also performs "low" in the category of greenhouse gas emissions and "very low" in the category of energy use.

## 1.2. Summary of the Report

This report attempts to present an overview of Turkey's performance on Chapter 15 and Chapter 27, with regard to environment, climate change mitigation and energy sector. Following the EU Council

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<sup>1</sup> <https://www.esrl.noaa.gov/gmd/ccgg/trends/global.html> (updated on 6 December 2018).

<sup>2</sup> Germanwatch, CAN Europe and New Climate Institute CCPI-Results 2019, [https://www.climate-change-performance-index.org/sites/default/files/documents/ccpi2019\\_results.pdf](https://www.climate-change-performance-index.org/sites/default/files/documents/ccpi2019_results.pdf)

meeting in December 2009, Chapter 15 remains one of the blocked chapters in the negotiations whilst Chapter 27 was opened to negotiations in 21 December 2009.

This report intends to summarise key aspects of the state of Chapter 15 and Chapter 27 in the negotiation process with the EU. The report aims to contribute a better understanding of the two Chapters in Turkey. Importantly, the report is not an alternative to EU's progress reports.

## **2. Fundamentals**

### **2.1. Environmental Rights, Accountability & Governance**

Turkish environmental legislations are mainly comprised of laws, regulations, statutes and decisions. As the framework, Environmental Law (No:2872, dated in 1983) aims to protect and improve the environment that is described as the common assets of all citizens in Turkey.

The state administration is organised in a hierarchical and rational way, ensuring basic lines of accountability. Most executive agencies are formally embedded under ministries. Internal and external oversight arrangements regarding the citizens' right to access environmental information need to be better implemented. Currently citizens' right to access environmental information is regulated by the law on the right to information, which does not require proactive disclosure of information and provides for broad exemptions on grounds of protecting state secrets, commercial secrets and personal data. Turkey is still not a party to the Aarhus Convention.

### **2.2. Environmental Monitoring**

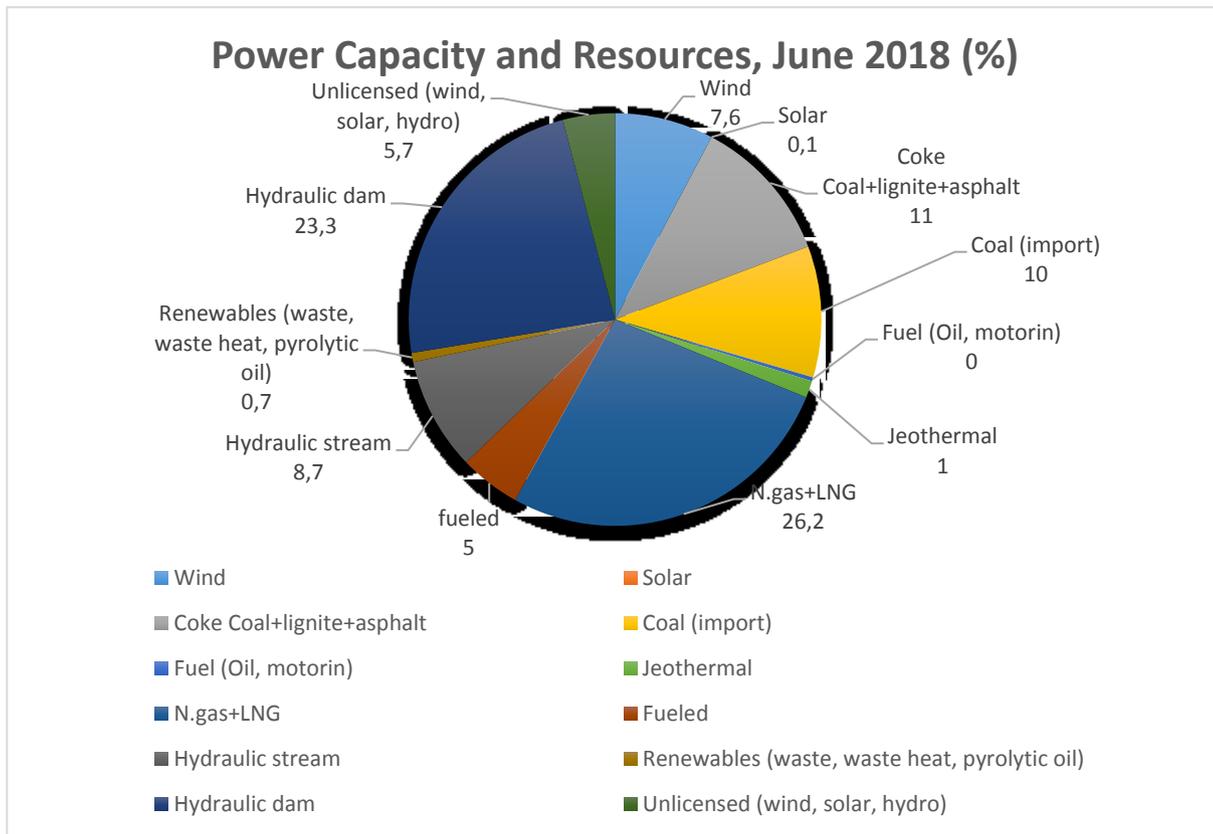
Turkey is a party to all key international environmental conventions which provide appropriate policy frameworks and promote cooperation and coherent action at global, regional and national levels to address environmental problems. Turkey is publishing National State of the Environment Report every four years. Environmental Indicator Reports and Provincial State of the Environment Reports are published annually and they are the main sources of the National State of the Environment Reports.

### 3. Obligations of Membership

#### 3.1. Energy (Under Chapter 15)

Following the EU Council meeting in December 2009, Chapter 15 on Energy remains one of the blocked chapters in the accession negotiations.

Global projections predict that the global economy will double until 2040 while the growth will not be reflected in the energy demand at the same rate. On a global scale, countries tend to grow by consuming less energy. There is no projections by sector in Turkey. However, Turkish Electricity Distribution Utility (TEİAŞ) updates its 10-year projection each year. According to TEİAŞ’s 10-year projection update in 2018, annual demand growth rates will be around 3.5-6.0 per cent until 2027.



Source: TEİAŞ

2012 had been announced as “Coal Year” in Turkey with the aim to double the share of domestic coal in electricity generation. However, the share of domestic coal in electricity generation has decreased gradually, from 18.9 per cent to 15.7 per cent, while the share of imported coal has increased from 9.9 per cent to 17.3 per cent between 2011 and 2017, according to TEİAŞ. The capacity of imported coal doubled while the capacity of domestic coal increased by 13 per cent despite all incentives.

##### 3.1.1. Renewable Energy

Ministry of Energy has initiated the incentives aiming to increase the share of domestic commodity in solar and wind energy utilities. The government conducted large scale solar and wind projects with purchase guarantees covering both the establishment of the factories and the instalments of the wind/solar facilities.

### *3.1.2. Energy Efficiency*

In Turkey, industrial energy consumption is concentrated in few sectors. The cement and iron and steel sectors consume 45 per cent of the primary energy and 29 per cent of the electricity consumed among the industrial sectors. There is also high potential for energy efficiency and saving in these sectors. These two sectors have an opportunity to recover more than 20 per cent of electricity. In the textile sector, the saving potential reaches 57 per cent.

According to the European Environment Agency's report (2014), the global energy intensity has decreased 2,1 annually since 2010, although Turkey is one of three countries that could not reduce its energy intensity among the European Economic Community countries. Turkey's energy intensity increased by 0.4 per cent annually between 2005-2014.

### *3.1.3. Nuclear Power and Safety*

There is no nuclear power plant in Turkey. However, there are 3 projects are under consideration. The port construction of Akkuyu nuclear power plant (NPP) which is a joint project of Turkish and Russian Governments, started in 2015. The project's EIA report has severe deficiencies including the waste management, contingency plans and assessment of the seismicity. EIA process for Sinop NPP on Black Sea started in early 2017. There is strong public and civil society opposition against the projects because of the deficiencies of the EIA reports and processes as well as the problems of the participatory processes.

## **3.2. Environment (Under Chapter 27)**

### *3.2.1. Horizontal Legislation*

The key points that need to be underlined in the field of horizontal legislation under Chapter 27 can be seen as follows<sup>3</sup>: Horizontal legislation in Turkey is still problematic. Environmental Impact Assessment can be defined as a process which examines the possible outcomes of a planned project on the environment. It is an important tool which is used in decision stages of investments posing a threat to environment and public health. However, the investments in energy, mining and construction sectors mostly overlook or ignore environmental conservation.

In Turkey, Environmental Impact Assessment (EIA) regulation entered into force in 1993, however the regulation has been revised 19 times since 1993 and many changes have been considered problematic. The fact that the Strategic Impact Assessment (SID) regulation was finally completed and entered into force in 2017 is a positive development, however the two provisional articles granting exemptions to fisheries and forestry sectors until 2020; and industry, energy, transportation, waste management, and telecommunications sectors until 2023 are contradicting with the objective of the regulation.

Unfortunately, there is no legislative regulation for the Health Impact Assessment (HIA).

Concerning the infrastructure, energy and transportation projects, the main objective of such projects is to increase the social welfare. Social welfare and the welfare distribution has three aspects; economic, social and ecological. Problems/conflicts in decision-making processes of projects actually arise from the fact that economic welfare is prioritized over the other two aspects. Between 1993 and 2017, as for the sectoral distribution of EIA decisions, investments in petroleum, mining and energy sectors got the first

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<sup>3</sup> This section is the summary of the two publications prepared by TEMA Foundation: "EIA Policy Paper 2018" (to be published soon) and "EIA Workshop-Conclusions" published in 2015 under the previous ENV.net Project period.

two positions in cases with a positive result for EIA. Furthermore, half of the 57.658 “EIA not necessary” decisions were granted to investments related to petroleum and mining.<sup>4</sup>

Cases alike threatening nature can also be seen in Turkey. By the end of 2013, a total of 62.754 hectares of forest area was used for activities like mining and oil exploration.

In addition to that, it is predicted that the precipitation rates will decline 20-40 per cent in south eastern and eastern parts, and up to 40 per cent in western and central parts of Turkey, given the fact that the country is located in the Mediterranean Basin being highly vulnerable to climate change, according to IPCC. Considering all the facts, impact assessment processes in Turkey become much more important. As the need for efficient and integrated impact assessment processes grows rapidly, it is of great significance to improve current practices and the body of current laws.

Participation should be transformed into a process which involves feedback mechanisms based on exchanges of views throughout the process, and should also include setting a scope, as it should be done by changing the framework of public participation meetings from something which goes beyond its purpose and where the parties do not trust each other. The Aarhus Convention has not yet been signed, which is an important shortcoming in terms of legislation related to participation in environmental decision making.

Regulations on periods for the EIA stages are also intended to shorten periods. As the shortening of periods makes it difficult to examine the EIA applications and reports.

Monitoring and supervision is also an important stage in the EIA process. The regulations concerning how to handle monitoring and supervision are insufficient.

Scope can be dealt with in two sub-sections, namely, the identification of projects to be implemented by EIA processes and the identification of subjects covered by the EIA. Annex-1 and Annex-2 of the EIA Regulation determine which projects will be subject to EIA and which projects will be evaluated through screening criteria. It is seen that the scope of the EIA has been narrowed down with the recent changes made in these lists. This narrow-down was made by increasing the lower bounds of the capacities of some projects listed in Annex-1, by transferring the projects such as public housing and golf courses from Annex-1 to Annex-2 and by increasing the lower limits of some projects listed in Annex-2. These changes cause many projects that may have significant environmental impacts to be exempted from EIA processes.

Another important shortcoming in designation of contents covered by the EIA is health effects. The health impact assessment (HIA) is an important tool to assess the likely impacts of a policy, a program or a project on the health of a population living in that area. As of December 2018, Turkey does not have a HIA legislation. Besides, it is observed that the EIA processes being carried out do not address the public health data in a comprehensive and comparative manner.

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<sup>4</sup> Ministry of Environment and Urbanization, <https://ced.csb.gov.tr/>

### 3.2.2. Air Quality

In Turkey, air quality at 67 per cent of the cities are dirty even according to national air quality limits.<sup>5</sup> In 2017, only one out of 81 cities had PM 10 levels below WHO guideline levels<sup>6</sup> and PM 10 in 3 cities was not measured properly.

Air pollution is the biggest reason of premature deaths in Turkey. 30.000 premature deaths are caused by air pollution yearly.<sup>7</sup> Importantly, there is no legislation with limit values for PM 2.5. In addition, there is no health impact or cumulative assessment in permit process of industrial facilities. Older version of dispersion modelling programmes are used at EIA processes.

National legislation shall be adjusted to comply with the limits of all pollutants including PM 10, PM 2.5, and SO<sub>2</sub> with the air quality guidelines of World Health Organization (WHO) and this must be applied to all industrial facilities in operation without any exception. Pilot PM 2.5 measurement must be disseminated to all cities in Turkey. Reliability of measurements data for all cities must be improved. Public, NGOs and academia access to data should be announced in an understandable format. Public transportation and bicycles in cities can be promoted to decrease emissions from transportation.

Clean Air Action Plans are under consideration whilst some of them are already prepared. Many EIA reports do not mention the Clean Air Action Plans.

### 3.2.3. Waste Management

In general, Turkey is mostly aligned with EU *Acquis* related to waste management. Following the first year of the project, Turkey continued to fulfill the requirements of Turkish Regulation on Waste Management (Official Gazette: 29314; 02.04.2015) and other legislative obligations. In addition, the Zero Waste Project aims to advance the circular economy in Turkey. Even though there has been progress under the project, Turkey still needs to revise its consumption patterns; to make sure that all wastes are classified by their sources and recycled; and to increase public awareness on climate change. In addition, an integrated waste management system is necessary for each province and town in Turkey. Importantly, wild dumping sites and landfilling methods still remain problematic in the country. In this respect, Turkey commits to reduce municipal landfill from 88,7 per cent (2014) to 65 per cent in 2023 and the current wild dumping sites will be rehabilitated across the country under the National Waste Management Action Plan (2016-2023).

According to Turkish Statistical Institute, total amount of waste in Turkey was 45 million tonnes and total municipal wastes accounted 31,6 million tonnes in 2016.<sup>8</sup> The updated rates on regular storage and other methods used by municipalities are as follows:

- Regular storage: 61,2 per cent
- Municipal garbage: 28,8 per cent
- Recovery: 9,8 per cent
- Others: 0,2 per cent.

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<sup>5</sup> Chamber of Environmental Engineers ÇMO (2018, Hava Kirliliği Raporu 2017).

<sup>6</sup> Turkish Thoracic Society (TDD) Air Pollution Working Group (2018).

<sup>7</sup> The Lancet Commission on Pollution and Health (2017). *Global Burden of Disease*.

<sup>8</sup> The Ministry of Environment and Urbanisation, *2016 Environmental Indicators*, Ankara 2018, <http://webdosya.csb.gov.tr/db/ced/icerikler/gostergeler-2016-20180618144826.pdf> (in Turkish).

#### 3.2.4. *Water Quality*

According to World Resource Institute, Turkey is expected to be ranked the most “water-stressed” countries by 2040<sup>9</sup>. So far, there are 25 basins defined by the Ministry in Turkey and each basin has its River Basin Protection Action Plans. However, the main problem related to water issues in Turkey is the lack of appropriate legal framework. The Regulation regarding Protection of Water Basins and Preparation of Management Plans enacted in 2012, contains elements for approximation of EU legislation, such as turning the “River Basin Protection Action Plans” into “River Basin Management Plans”.

#### 3.2.5. *Nature Protection*

In Turkey, to develop policies concerning nature protection, to designate and manage protected areas, to develop and implement plans and programmes are under the responsibility of the Ministry of Agriculture and Forestry and the Ministry of Environment and Urbanization and their affiliated organizations. The framework law on nature protection has not entered into force. The institutional framework for designating and managing Natura 2000 sites has not yet been drawn up. The national biodiversity strategy and action plan has not been revised. Investments, particularly in energy (such as hydropower and coal power plants) and mining, need to be made in compliance with the relevant national and international obligations to protect nature.

#### 3.2.6. *Industrial Pollution and Risk Management*

Ministry of Environment & Urbanization and World Bank carried out a project together between 2011-2016 on MRV system. The objective of the project was to contribute to setting up the MRV system in Turkey, and investigation of credits, trading schemes and options to get prepared for decision making process. The Regulation on Monitoring of Greenhouse Gas Emission (“MRV Regulation”) which was enacted in 2014 has been successfully implemented.

#### 3.2.7. *Chemicals*

The new regulation called “Registration, Evaluation, Authorisation, Restriction of Chemicals” with the Official Gazette number 30105 came into force on 23 June 2017. With this regulation, “Regulation on the Safety Data Sheets of the Dangerous Chemicals and Compounds”, “Regulation on the Inventory and Control of Chemicals” and “Regulation on Restriction of Chemicals and Chemical Compounds” were consolidated. In addition, new restrictions accepted and came into force in December 2017 are also similar to EU REACH Annex XVII. On the other hand, Turkey has been identified as one of the countries of origin in 3.3 per cent of all registered alerts in the EU market.<sup>10</sup>

Issues regarding genetically modified organisms (GMOs) in Turkey is still controversial. Alignment is yet to be completed. Even though the use of GMOs for food is banned in the country, Turkey’s Biosafety Council approved the use three types of soybeans and one type of corn GMO traits as animal food under the Decision published in the Official Gazette 2 August 2017. Again, in January 2018, the Council

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<sup>9</sup> <https://www.wri.org/blog/2015/08/ranking-world-s-most-water-stressed-countries-2040>

<sup>10</sup> European Commission (2018). *2017 Results of the EU Rapid Alert System for dangerous non-food products*, available at:

[https://ec.europa.eu/consumers/consumers\\_safety/safety\\_products/rapex/alerts/repository/content/pages/rapex/reports/docs/Rapex\\_annual\\_Report\\_2017.pdf](https://ec.europa.eu/consumers/consumers_safety/safety_products/rapex/alerts/repository/content/pages/rapex/reports/docs/Rapex_annual_Report_2017.pdf)

approved the import application on two corns and one soybeans GMO as animal food whilst ten cotton and four canola GMO are not imported.

Turkish Biosafety Council was established under the Biosafety Law in 2010 (No. 5977). On August 2018, the Council is no longer active and its authority was transferred to the Ministry of Agriculture and Forestry.

Turkey also enacted the legislation on persistent organic pollutants (POPs) dated on 14 November 2018 with the Official Gazette Number 39595.

Regulation on “Working Procedures and Principles of Animal Experiments Ethics” published in Official Gazette Number 28914 dated 15 February 2014.

### 3.2.8. Noise

The field of noise is mostly aligned with the EU *Acquis*, according to EU’s Progress Reports. In addition, the Ministry of Environment and Urbanization in cooperation with relevant municipalities plans to complete noise maps of 66 Turkish provinces by the end of 2019. Environmental Noise Action Plan (2009-2020) was prepared.

### 3.2.9. Civil Protection

Turkey ranks the first country in humanitarian aid with 8.07 billion US Dollars.<sup>11</sup> However, Turkey also ranks the third in the world in terms of earthquake-related casualties, including the 1999 Marmara Earthquake, the 2006 Flood in the South East, and the 2011 Van Earthquake. In this respect, coordination of disasters and legal authority remains crucial.

Turkey and the EU have been collaborating in the field of disaster management. Turkey is for instance a member of European Civil Protection Mechanism since 2006. In addition, the number of refugees has reached almost 4 million,<sup>12</sup> which is the highest number of refugees around the world. The EU has contracted 50 humanitarian projects in order to help refugees. The EU humanitarian funding to support similar type of humanitarian activities in basic needs, health, education through the Facility for Refugees in Turkey is 1.45 billion Euro between 2016-2018. The Facility supports both humanitarian and non-humanitarian assistance. It has a total budget of 6 million Euros from the EU and Member States. According to special report from the European Court of Auditors (ECA) published in November 2018,<sup>13</sup> Turkey provided a significant support for the Facility.

In 2009, the Turkish Parliament approved the Law No.5902 to form the Disaster and Emergency Management Authority (AFAD) under the Prime Minister. On 16 April 2017, Turkey adopted a presidential system of governance after a referendum. In the aftermath of the approval of the news system, AFAD re-formed under the Ministry of Interior<sup>14</sup> by the Presidential Decree No. 4 that was published in the Official Gazette on 15 July 2018. It takes necessary measures for effective emergency management and civil protection in the country. It operates to minimize disaster-related damages,

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<sup>11</sup> Global Humanitarian Assistance Report 2018.

<sup>12</sup> [https://ec.europa.eu/echo/where/europe/turkey\\_en](https://ec.europa.eu/echo/where/europe/turkey_en)

<sup>13</sup> European Court of Auditors (2018). *The Facility for Refugees in Turkey: helpful support, but improvements needed to deliver more value for Money*, Special Report No:27/2018, Luxembourg, available at: [https://www.eca.europa.eu/Lists/ECADocuments/SR18\\_27/SR\\_TRF\\_EN.pdf](https://www.eca.europa.eu/Lists/ECADocuments/SR18_27/SR_TRF_EN.pdf)

<sup>14</sup> Presidential Decree No. 4, available in Turkish at [https://www.afad.gov.tr/upload/Node/29467/files/4\\_nolu\\_KHK\\_2nci\\_Bolum\\_AFAD.pdf](https://www.afad.gov.tr/upload/Node/29467/files/4_nolu_KHK_2nci_Bolum_AFAD.pdf)

coordinate post-disaster response. Importantly, it introduced a novel disaster management in transition towards risk management. It has 81 provincial branches in Turkey.

The Turkish Parliament passed the Law on Precautions to be taken due to Disaster Affecting Public Life and Assistance to be Provided No.7269. The legislative framework on disaster is present under the by-law on the Principles of the Organization and Planning of Emergency Assistance Regarding Disasters.

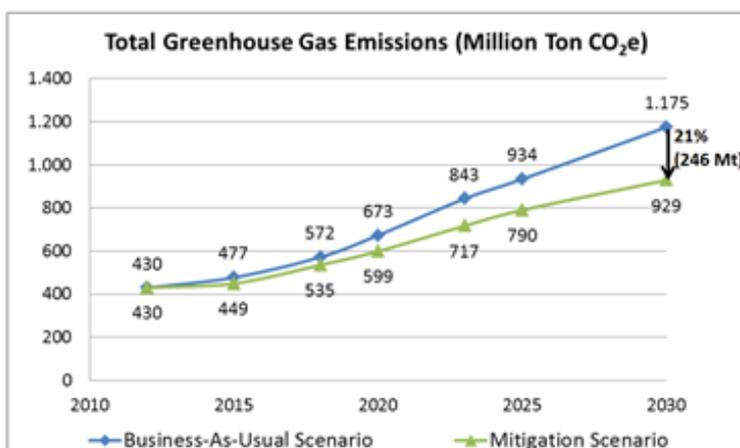
At national level, The Turkish Red Crescent Organisation also organises humanitarian relief and assists in the delivery of medical teams, equipment, blood, blood products and their distribution and storage. Another one is General Directorate of Civil Defence (Ministry of Interior) which aims to organise all activities.

### 3.2.10. Climate Change

As a candidate country for the EU membership, environmental agreements should be at the core of Turkey’s policy-making processes. Turkey must increase measures for climate change mitigation and adaptation. Previously, Turkey indicated an intent to combat climate change in several international agreement. The country became a party to the United Nations Framework Convention on Climate Change (UNFCCC) in 1992 and ratified the Kyoto Protocol in 2009 and signed the Paris Agreement in April 2016 but has not yet ratified it.

Greenhouse gas emissions from Turkey have doubled since the 1990s. According to the emission inventory of Turkstat (Turkish Statistical Institute), the sector most responsible for emissions is the energy sector (73 per cent). The industry (13 per cent), agriculture (11 per cent), and waste sectors (3 per cent) follow the energy sector regarding emissions. There should be greenhouse gas emission mitigation efforts in every sector to attenuate climate change.

The INDC target of Turkey is 21 per cent emission reduction from 1.175 MtCO<sub>2</sub>e to 929 MtCO<sub>2</sub>e according to its business as usual scenario.<sup>15</sup>



<sup>15</sup>[https://www4.unfccc.int/sites/submissions/INDC/Published%20Documents/Turkey/1/The\\_INDC\\_of\\_TURKEY\\_v.15.19.30.pdf](https://www4.unfccc.int/sites/submissions/INDC/Published%20Documents/Turkey/1/The_INDC_of_TURKEY_v.15.19.30.pdf)

#### **4. Conclusions and recommendations**

With the lens of EU accession negotiations, Turkey continues to adopt EU Directives on energy, environment and climate change. However, Turkey still remains one of the G20 countries that has not ratified the Paris Agreement. Full alignment regarding water, climate change, emission reduction, EIA, and nature protection is limited. In the field of energy policy of the EU, renewable energy is one of the priority sectors in the EU in meeting climate and SDGs targets. Turkey is also rich in solar energy sources and has a very high potential to develop renewable energy market at national level.