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# Technical Assistance for Assessment of Türkiye's Potential on Transition to Circular Economy EuropeAid/140562/IH/SER/TR

AB Döngüsel Ekonomi Eylem Planı Doğrultusunda Türkiye Bağlamı

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Activity 1.2.2. Circular Economy Workshops  
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# INITIAL ASSESSMENT REPORT

The 3 major action groups of the action plan consisting of 35 actions; **"Sustainable Product Policy Framework, Key Product Value Chains and Less Waste, More Value"** of the action plan, including 25 actions, are analysed.

The **preliminary compliance status** of the current national policy and legal framework to the circular economy related directives is analyzed.

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# ACTIONS REVIEWED IN THE SCOPE OF THE PRELIMINARY ASSESSMENT REPORT

## SUSTAINABLE PRODUCT POLICY FRAMEWORK

1. Legislative proposal for a **sustainable product policy initiative**
2. Legislative proposal empowering consumers in the **green transition**
3. Legislative and non-legislative measures establishing a new **“right to repair”**
4. Legislative proposal on substantiating **green claims**
5. Mandatory **Green Public Procurement (GPP)** criteria and targets in sectoral legislation and phasing-in mandatory reporting on GPP
6. Review of the **Industrial Emissions Directive (IED)**, including the integration of circular economy practices in upcoming Best Available Techniques reference documents (BREFs)
7. Launch of an industry-led **industrial symbiosis** reporting and certification system



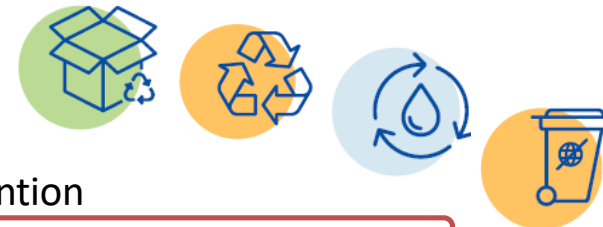
## KEY PRODUCT VALUE CHAINS

1. Electronics and ICT
2. Batteries and Vehicles
3. Packaging
4. Plastics
5. **Textiles**
6. Construction and Buildings
7. Food



## LESS WASTE, MORE VALUE

1. Waste reduction targets for specific streams and other measures on waste prevention
2. EU-wide harmonised model for separate collection of waste and labelling to facilitate separate collection
3. Methodologies to track and minimise the presence of substances of concern in recycled materials and articles made thereof
4. Harmonised information systems for the presence of substances of concern
5. Scoping the development of further EU-wide end-of-waste and by-product criteria
6. Revision of the rules on waste shipments



# TURKISH CONTEXT IN RELATION EU CEAP ACTIONS

## SUSTAINABLE PRODUCT POLICY FRAMEWORK



### Legislative Proposal for a Sustainable Product Policy Initiative

**A proposal for a Regulation on Eco-design for Sustainable Products was published on 30 March 2022.**

The proposal extends the scope of the Eco-design framework to cover the broadest possible range of products.

It foresees setting minimum criteria not only for energy efficiency but also for circularity.

The framework will allow for setting a wide range of requirements, including:

- Product durability, reusability, upgradability and reparability
- Presence of substances that inhibit circularity
- Energy and resource efficiency
- Recycled content
- Remanufacturing and recycling
- Carbon and environmental footprints
- Information requirements, including a Digital Product Passport

### National Context

#### Regulation on the Eco-design Requirements for Energy-Related Products

In line with the current EU Eco-design Directive, its scope is limited with the energy-related products.

#### Procedures and Principles Regarding the Establishment and Operation of Waste Collection Centers and Zero Waste Practices

Priority is given to the repair and reuse of unused products or components, if appropriate, and waste generation is reduced by extending product life.

#### Regulation on Waste Electrical and Electronic Equipment (WEEE)

The regulation bans the use of Pb, Hg, Cr6+, PBB, PBDE and Cd in the products. Producers are required to inform the consumers and WEEE treatment facilities on the hazardous substances in their products.

#### Turkey's Green Deal Action Plan

2.5.1. Harmonization of the new legislative framework of the EU Sustainable Product Initiative

2.5.2. Conducting sector-based informative activities subsequent to the announcement of the Sustainable Product Initiative and EU legislative framework

2.6.1. Tracking the revisions in the EU chemicals legislation and completing the process of harmonizing to EU legislation.

# TURKISH CONTEXT IN RELATION EU CEAP ACTIONS

## KEY PRODUCT VALUE CHAINS

### Textile Product Value Chain

**EC adopted the EU strategy for sustainable and circular textiles on 30 March 2022.** Some of the actions are;

- Set design requirements for textiles to make them last longer, easier to repair and recycle
- Introduce clearer information on textiles and a digital product passport
- Stop overproduction and overconsumption, and discourage the destruction of unsold or returned textiles
- Harmonise EU EPR rules for textiles and economic incentives to make products more sustainable
- Publish a transition pathway by the end of 2022 - an action plan for actors in the textiles ecosystem to successfully achieve the green and digital transitions and increase its resilience



### National Context

#### **Integrated Pollution Prevention and Control Communique for Textile Sector**

It aims to minimize the environmental impacts in textile production by using resource and energy efficient processes and clean erproduction technologies. This regulation mainly focuses on the production phase within the framework of BAT and does not cover the circularity approach as a whole.

#### **Regulation on Environmental Labelling**

Textile products is among the product groups for which environmental labelling criteria are available in accordance with the Regulation

#### **Procedures and Principles Regarding the Establishment and Operation of Waste Collection Centers and Zero Waste Practices**

It is essential to collect the used textile products in order to extend their life, to deliver them to the needy and to ensure their reuse. Within the scope of separate collection of wastes, local administrations ensure that collection equipment is placed for the collection of textiles/clothes.

#### **Turkey's Green Deal Action Plan:**

2.1.5. Updating the cleaner production legislation of the textile sector which has a high water consumption

2.1.6. Developing a cleaner production legislation for leather sector which has a high water consumption

2.1.7. Organizing cleaner production trainings on cleaner production practices in textile and leather sectors.

# TURKISH CONTEXT IN RELATION EU CEAP ACTIONS

## LESS WASTE, MORE VALUE

### EU-wide harmonised model for separate collection of waste and labelling to facilitate separate collection

- Addressing the density and accessibility of separate collection points
- Facilitating consumer involvement through different ways such as common bin colours, harmonised symbols for key waste types, product labels, information campaigns and economic instruments
- Seeking standardisation and the use of quality management systems to assure the quality of the collected waste destined for use in products, and in particular as food contact material
- Providing guidance for separate collection of municipal waste

### National Context

#### Zero Waste Program supported by Zero Waste Regulation

Ensuring more efficient use of resources, landfilling reduction, and increased recycling and reuse

Establishing a Zero Waste Management System and source separation by type of waste

#### Procedures and Principles Regarding Zero Waste Practices

Ensuring that the wastes collected separately at the source are collected by local administrations without mixing them with each other

The zero waste logo and the phrase “Zero Waste Collection Vehicle” are used on collection/transport vehicles, and the colors and labels specified are followed.

#### Procedures and Principles Regarding the Establishment and Operation of Waste Collection Centers and Zero Waste Practices

Establishment of collection points by placing collection equipment based on the amount and characteristics of waste in easily visible and accessible places

Informing consumers (such as in-store announcements, social media accounts) regarding the collection points established

#### Turkey’s Green Deal Action Plan

2.1.8. Providing information to the companies, primarily SMEs, on environmental labelling and waste management





# PRELIMINARY COMPLIANCE STATUS TO THE EU CIRCULAR ECONOMY RELATED POLICIES

EU Legislation	Legislative Alignment	Estimated Alignment / Implementation Date	Responsible Institution	National Legislation
Waste Framework Directive (WFD) (2008/98/EC) (Amended by the Directive 2018/851)	Mostly Aligned	2023	MoEUCC	Waste Management Regulation (02.04.2015/29314)
Waste Oils	Aligned		MoEUCC	Regulation on the Management of Waste Oils (21.12.2019/30985)
Construction and Demolition Waste	Aligned		MoEUCC	Excavation, Construction and Demolition Waste Regulation (08.03.2004/25406)
Bio-waste	Aligned		MoEUCC	Notice on Composting (05.03.2015/29286) Notice on Mechanical Separation, Bio-drying and Biomethanization Plants and Fermented Product Management (10.10.2015/29498) Zero Waste Regulation (12.07.2019/30829) Regulation Amending the Zero Waste Regulation (09.10.2021/31623) Procedures and Principles Regarding the Establishment and Operation of Waste Collection Centers and Zero Waste Practices (31.12.2021)
Medical/Healthcare Waste	Aligned		MoEUCC	Regulation on Control of Medical Waste (25.01.2017/29959)
Waste Prevention & Waste Prevention Programmes	Partly Aligned		Presidency MoEUCC	National Zero Waste Programme Zero Waste Regulation (12.07.2019/30829) Regulation Amending the Zero Waste Regulation (09.10.2021/31623) Notice on Refused Derived Fuel, Additional Fuel and Alternative Raw Materials (20.06.2014/29036) Procedures and Principles Regarding the Establishment and Operation of Waste Collection Centers and Zero Waste Practices (31.12.2021)
Waste Management Plans	Mostly Aligned		MoEUCC	National Waste Management Action Plan (2016-2023) Zero Waste Regulation (12.07.2019/30829) (Provincial Zero Waste Management Plans)
Extended Producer Responsibility	Mostly Aligned		MoEUCC	Recovery Contribution Fee (GEKAP) Regulation (31.12.2019/30995) Procedures and Principles on Producer Responsibility Organizations (22.10.2012/B.09.0.ÇYG.0.10.04-145.07-12444)
By-product	Partly Aligned		MoEUCC	Waste Management Regulation (02.04.2015/29314)
End-of-Waste	Not Aligned		MoEUCC	-

# PRELIMINARY COMPLIANCE STATUS TO THE EU CIRCULAR ECONOMY RELATED POLICIES

EU Legislation	Legislative Alignment	Estimated Alignment / Implementation Date	Responsible Institution	National Legislation
Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation (1907/2006)	Mostly Aligned	Upon Accession	MoEUCC	Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation (23.06.2017/30105)
Restriction of Hazardous Substances (ROHS) Directive (2011/65/EC)	Partly Aligned	2022	MoEUCC	Waste Electrical and Electronic Equipment (WEEE) Regulation (22.05.2012/28300) (complying with the former directive)
Waste Electrical and Electronic Equipment (WEEE) Directive (2012/19/EU) (Amended by the Directive 2018/849)	Partly Aligned	2022	MoEUCC	Waste Electrical and Electronic Equipment (WEEE) Regulation (22.05.2012/28300) (complying with the former WEEE Directive (2008/98/EC)) Zero Waste Regulation (12.07.2019/30829) Regulation Amending the Zero Waste Regulation (09.10.2021/31623) Procedures and Principles Regarding the Establishment and Operation of Waste Collection Centers and Zero Waste Practices (31.12.2021)
Waste Batteries and Accumulators Directive (2006/66/EC) (Amended by the Directive 2018/849)	Mostly Aligned		MoEUCC MoIT	Waste Batteries and Accumulators Regulation (31.08.2004/25569) (23.12.2014/29214) Zero Waste Regulation (12.07.2019/30829) Regulation Amending the Zero Waste Regulation (09.10.2021/31623) Procedures and Principles Regarding the Establishment and Operation of Waste Collection Centers and Zero Waste Practices (31.12.2021)
Packaging and Packaging Waste Directive (94/62/EC) (Amended by the Directive 2018/852)	Mostly Aligned		MoEUCC	Packaging Waste Regulation (26.06.2021/31523) Procedures and Principles Regarding the Establishment and Operation of Waste Collection Centers and Zero Waste Practices (31.12.2021)
Lightweight Plastic Bags Directive (2015/720)	Not Aligned		MoEUCC	-
Single Use Plastics (SUP) Directive (2019/904)	Partly Aligned	Not Determined	MoEUCC	Packaging Waste Regulation (26.06.2021/31523) Recovery Contribution Fee (GEKAP) Regulation (31.12.2019/30995) Procedures and Principles on Plastic Bags Fees (09.01.2019/66745475-145.07-6267) (31.12.2021/66745475-145.07-6267-2599505) Zero Waste Regulation (12.07.2019/30829) Regulation Amending the Zero Waste Regulation (09.10.2021/31623) Procedures and Principles Regarding the Establishment and Operation of Waste Collection Centers and Zero Waste Practices (31.12.2021)
Landfill Directive (1999/31/EC)	Mostly Aligned	Not Determined	MoEUCC	Landfill Regulation (26.03.2010/27533)



# PRELIMINARY COMPLIANCE STATUS TO THE EU CIRCULAR ECONOMY RELATED POLICIES

EU Legislation	Legislative Alignment	Estimated Alignment / Implementation Date	Responsible Institution	National Legislation
Mining Waste Directive (2006/21/EC)	Partly Aligned	2025	MoEUCC	Mining Waste Regulation (15.07.2015/29417)
End of Life Vehicles (ELV) Directive (2000/53/EC) (Amended by the Directive 2018/849)	Mostly Aligned	2023	MoEUCC	End of Life Vehicles (ELV) Regulation (30.12.2009/27448) End of Life Tyres Regulation (25.11.2006/26357)
PCB/PCT Directive 96/59/EC (Amended by the Regulation (EC) No 596/2009)	Mostly Aligned	2025	MoEUCC	Regulation on the Control of PCB/PCT (27.12.2007/26739)
Sewage Sludge Directive (86/278/EC)	Aligned		MoEUCC MoT	Urban and Municipal Sewage Sludge on Soil Regulation (03.08.2010/27661)
Ship Recycling Regulation (1257/2013)	Partly Aligned	Not Determined	MoIT MoEUCC	Ship Dismantling Regulation (08.08.2004/25396) Notice on Waste Ship Recycling (Draft)
Waste Shipment Regulation (1013/2006)	Mostly Aligned	Upon Accession	MoEUCC MoT	Waste Management Regulation (02.04.2015/29314) Basel Convention Communique on the Transport of Waste on the Highway (20.03.2015/ 29301)
Industrial Emissions Directive (IED) (2010/75/EU)	Partly Aligned	Not Determined	MoEUCC	Integrated Environmental Permits Regulation (Draft) Integrated Pollution Prevention and Control Regulation (Draft) Waste Incineration Regulation (06.10.2010/27721)
Eco-label Regulation (66/2010)	Partly Aligned	Upon Accession	MoEUCC TSI	Environmental Labelling Regulation (19.10.2018/30570) (national eco-labelling system established based on EN ISO 14024 type I standard)
Eco-design Directive (2009/125/EC)	Aligned		MoIT	Eco-design Regulation (05.02.2022/31741)
Eco-Management and Audit Scheme (EMAS) Regulation (1221/2009)	Not Aligned	Upon Accession	MoEUCC	-
Strategic Environmental Assessment Directive (2001/42/EC)	Mostly Aligned	Not Determined	MoEUCC	Strategic Environmental Assessment Regulation (08.04.2017/30032)



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# Thanks for your attention.



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