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MINISTRY OF ENVIRONMENT AND URBANISATION - ENVIRONMENTAL INSPECTION REPORT OF TURKIYE IN 2011 ◆ Ankara – 2012

ENVIRONMENTAL INSPECTION REPORT OF TURKIYE IN 2011

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ENVIRONMENTAL INSPECTION REPORT OF TURKIYE IN 2011
ANKARA – 2012

Editors: Dr. A. Çağatay DİKMEN (Deputy General Director)
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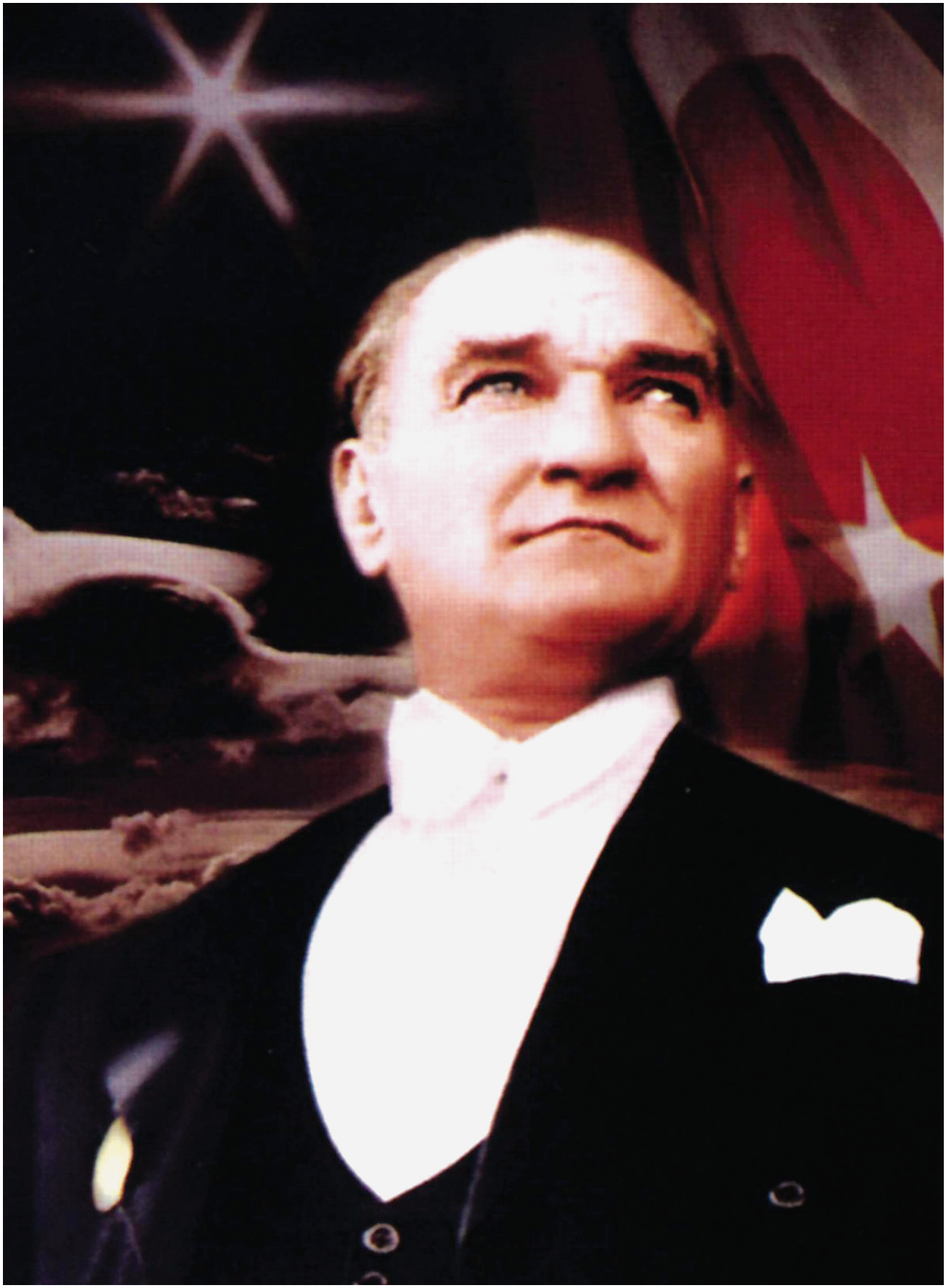

PREFACE

Environment and environmental problems, which have increasingly become the biggest common concern of the humanity, constitute the agenda of the rapidly developing world. With the rapid increase in the population of the world and with the development of industry, the increase in environmental pollution and the decrease in the natural resources have become the most significant global problems of today. The efforts for coping with the problem of pollution arising from industrial activities and the global and regional works have gained more importance, considering the possibility that the assumptions regarding the much more severe future environmental threats may become realities in a shorter time. In addition to these, the concepts of efficient use of sources and clean production – i.e. early prevention of environmental impacts at their source - have emerged and the works in this area have gained momentum. Within this framework, it is regarded as a great development to create rules of responsibility for environmental protection policies and to put into effect the legal regulations in order to perform successful and healthy environmental management. As a consequence of this, environmental inspections, which aim to inspect compliance with the permissions granted to industrial facilities, are of great importance for a more efficient implementation of the environmental legislation.

The central and provincial organizations of the Ministry of Environment and Urbanisation carried out more than 51.000 environmental inspections in 2011. 2011 Environmental Inspection Report, of which the third report is published this year, provides information on the inspection activities carried out in the area of environment as well as data on the enforcement implemented in the consequence of these inspections. The book also includes data and assessments on the process of Environmental Impact Assessment (EIA), Provisional Activity Certificate, and Certificate of Environmental Permit/Environmental Permit and License.

I hope that the 2011 Environmental Inspection Report, produced by our Ministry, will serve as a helpful resource for all users.

All the works we have done and we are doing as the Ministry is for our people to live in a country with a much cleaner environment in the future.

Erdoğan BAYRAKTAR
Minister of Environment and Urbanisation

ABBREVIATIONS

EU	European Union
BIMER	Information Center
BLEI	By Law on Environmental Inspection
DGEIAPI	Directorate General of Environmental Impact Assessment, Permit and Inspection
DGEIAP	Directorate General of Environmental Impact Assessment and Planning
BLEIA	By Law on Environmental Impact Assessment
PAC	Provisional Activity Certificate
BLPLREL	By Law on the Permit and Licenses Required by the Environmental Law
PDEU	Provincial Directorate of Environment and Urbanisation
DGEM	Directorate General of Environmental Management
ECENA	Environmental Compliance and Enforcement Network for Accession
IMPEL	European Network for the Implementation and Enforcement of Environmental Law
INECE	International Network for Environmental Compliance and Enforcement
MSI	Market Surveillance and Inspection
RENA	Regional Environmental Network for Accession
TEIEN	Turkish Environmental Information Exchange Network

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1- INTRODUCTION

2011 was an important year in which great structural changes were made in the field of environment in our country; the Ministry of Environment and Urbanisation was established by the "Decree Law on the Organization and Duties of the Ministry of Environment and Urbanisation", which come into force by promulgation in the Official Gazette no. 27984 of 04 July 2011 and the Ministry was granted the authority to apply Article 56 of the Constitution and to implement the Environmental Law no. 2872.

> *ARTICLE 56- Everyone has the right to live in a healthy, balanced environment. It is the duty of the state and citizens to improve the natural environment, and to prevent environmental pollution.*

While the Ministry of Environment and Forestry held the authority to implement environmental inspections and enforcement according to Article 12 of the Environmental Law until 04 July 2011, the Ministry of Environment and Urbanisation took over the authority to carry out inspections and implement enforcements within the scope of the Environmental Law after its establishment by the "Decree Law on the Organization and Duties of the Ministry of Environment and Urbanisation", which came into force by promulgation in the Official Gazette no. 27984 of 04 July 2011. Figure 1 shows the organizational chart of the newly established Ministry of Environment and Urbanisation.

> *The Ministry has the authority to control and inspect whether the provisions of this Legislation are adhered to or not. In cases where necessary, the aforesaid authority can be delegated to the following institutions by the Ministry: special provincial administrations, the municipalities with established environmental inspection units, Undersecretariat of Maritime, Coast Guard Command, the persons commissioned with the control and inspection in accordance with 13 October 1983 dated and 2918 numbered Land Routes Traffic Act. The inspections are conducted under the procedures and the principles which are determined by the Ministry. (Environmental Law, Article 12).*

The Constitutional Court cancelled the phrase "to other institutions and organizations deemed appropriate by the Ministry" in Article 12 of the Environmental Law. The reason for cancellation was based on Article 7 of the Constitution "Legislative power is vested in the Turkish Grand National Assembly on behalf of the Turkish Nation. This power cannot be delegated." and Article 123 of the Constitution "The administration forms a whole with regard to its structure and functions, and shall be regulated by law. The organization and functions of the administration are based on the principles of centralization and local administration. Public corporate bodies shall be established only by law, or by the authority expressly granted by law." In the decision, it was stated that the principle "legality of administration" would necessitate the legal arrangement of duties and authorities of the administration without allowing for any disruption. According to the Constitutional Court, the authority to inspect whether the provisions of the Law are observed is granted to the Ministry of Environment and Urbanisation by Article 12 of the Environmental Law. After the listing of the public institutions and organizations to which this authority may be delegeted by the Ministry, it is stated in the cancelled phrase that the authority to inspect may also be delegeted to other institutions and organizations that are deemed appropriate by the Ministry, apart from the institutions and organizations specified in the Law. However, it would be incompatible with Articles 7 and 123 of the Constitution if it was left to the Ministry's discretion to delegete the inspection authority to other institutions and organizations, without these institutions and organizations being explicitly specified in the Law.

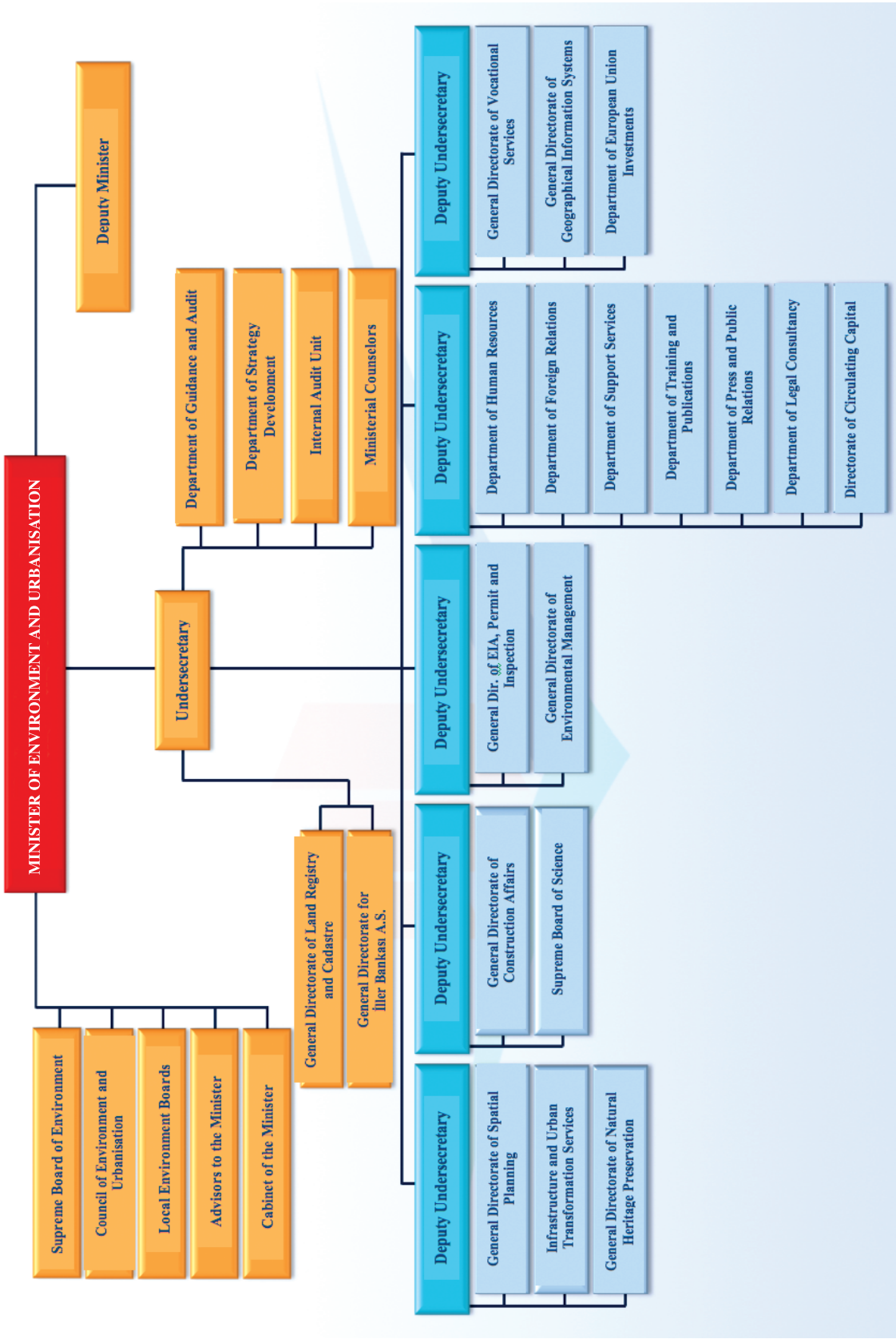


Figure 1 – Organizational Chart of the Ministry of Environment and Urbanisation

Besides, it is stated in Article 24 of the Environmental Law that the Ministry may delegete the authorities of environmental inspection and implementation of enforcements to the Undersecretariat of Maritime Affairs, the Coast Guard Command, special provincial administrations, and to the municipalities with environmental inspections units, as stated in the Environmental Law.

The Ministry shall have the authority to make decisions regarding administrative enforcements specified in this Law. This authority shall be also used by the organizations and institutions to which the inspection authority has been delegeted in accordance with the first paragraph of Article 12. The decisions regarding the administrative enforcements laid down in this Law shall be made by the general directors at the central organization of the Ministry and by the provincial directors of environment and forestry at the provincial level. (Environmental Law – Article 24).

"The procedures and the principles which are determined by the Ministry" for environmental inspection specified in the inspection article of the Environmental Law have been regulated by the By Law on Environmental Inspection and the Ministry carries out the environmental inspections within the framework of the "By Law on Environmental Inspection". In general, the first "By Law on Environmental Inspection" to take the Combined Environmental Inspecion as the basis come into force by promulgation in the Official Gazette no. 24631 of 05 January 2002.

Then the By Law was updated by new the By Law Environmental Inspection of 1 January 2009 promulgated in the Official Gazette no. 27061 of 21 November 2008 in order to overcome the problems in the implementation of the first by law. The new by law was prepared in parallel with the "Recommendation of the European Parliament and of the Council of 4 April 2001 providing for minimum criteria for environmental inspections (RMCEI) (2001/331/EC)" prepared by the IMPEL Network, as a consequence of the new environmental point of view arising from the EU harmonization process of our country.

Following the new structuring of the Ministry, the By Law on Environmental Inspection has been implemented by the Department of EIA Monitoring and Environmental Inspection under the General Directorate of Environmental Impact Assessment, Permit and Inspection. In addition, the monitoring and control works under the By Law on EIA (BLEIA) are also carried out by the mentioned General Directorate. The responsibilities of the General Directorate of Environmental Impact Assessment, Permit and Inspection, which was created under the new structure, are as follows:

a) To perform environmental impact assessments and strategic environmental assessments, to take necessary decisions in this respect, and to monitor and inspect them.

b) To monitor all activities and facilities for the prevention of environmental pollution and improvement of environmental quality, to take and inspect necessary measures and to make the relevant bodies to take and necessary measures, and to give environmental permit and licenses.

c) To monitor and inspect the emission, discharge, waste, treatment and disposal systems of the facilities and activities resulting in environmental pollution.

ç) To monitor the activities related to waste and chemicals, air pollution, noise, vibration and non-ionizing radiation throughout the country, including the free regions; to determine and inspect all activities that are influential on underground and surface waters, seas and soil, and to stop activity in dangerous circumstances or in necessary situations.

d) To carry out works and transactions regarding the establishment and

management of clean air centers.

e) To document, monitor and inspect the compliance of the exhaust emission values of motor vehicles with the determined standards.

f) To monitor receiving medias; to create the necessary infrastructure for this; to determine and implement the measurement and analysis criteria relating to environmental pollution; to establish or ensure the establishment of laboratories to perform all kinds of environmental measurement, monitoring, analysis and control; to carry out the accreditation transactions of these laboratories; to determine the organizations that will make measurements regarding the receiving medias.

g) To license, monitor and inspect all waste disposal facilities.

ğ) To carry out inspections, make other bodies perform inspections, and ensure coordination between responsible organizations in order to detect the reliability and compliance, with the relevant legislation and technical regulations, of the products that fall within the area of responsibility of the Ministry.

h) To prepare environmental inventory and environmental status report and to conduct relations with the European Environment Agency.

ı) To monitor and inspect the activities that fall within its area of responsibility, to follow up the international works and enable those works to be implemented at national level.

i) To carry out similar works to be assigned by the Minister.

In addition to the central organization of the Ministry, 81 Provincial Directorates of Environment and Urbanisation (PDEU) carry out works of environmental inspection, EIA monitoring and control within the scope of the Environmental Law.

According to the Recommendations of the European Parliament and of the Council of 4 April 2001 providing for minimum criteria for environmental inspections in the Member States (2001/331/EC), the inspection activities must be assessed and reported as a whole on a regular basis (e.g. annually) by the inspection units. The Ministry published its first annual inspection report in 2009 and the second report in 2010; and this report is the third annual inspection report published by our Ministry.

This report aims to present statistical data about the environmental inspections activities and types performed by the Ministry under the Environmental Law in 2011 and to provide a general assessment about the efficiency of the mentioned activities. The report also includes the administrative enforcements against the non-compliances with the environmental legislation, which have been detected as a result of the environmental inspections, as well as data on the distribution of the enforcments by environment. Furthermore, this report gives, for the first time, data on the market surveillance and inspection (MSI) performed by the Ministry.

In addition to these, the report includes data and assessments: about the decisions made by the central and provincial organizations of the Ministry under the By Law on EIA in 2011; about the Provisional Activity Certificates granted according to the By Law on the Permit and Licenses Required by the Environmental Law; about the Certificates of Environmental Permit/Environmental Permit and License, and about sectoral distributions, as these are directly related to the inspections activities.

Moreover, this report contains the project activities related to the planning of the environmental inspections of the Ministry in 2011, as well as relations with the international networks of inspectors and participation in their meetings and activities.

2- IMPORTANCE OF INSPECTIONS

It is stated in Article 56 of the Constitution that "Everyone has the right to live in a healthy, balanced environment" and that "it is the duty of the state and citizens to improve the natural environment and to prevent environmental pollution". Within this framework, the state uses its authority "to make regulations" and "to perform inspections" for the protection of the environment and prevention of pollution in fulfilling its duties.

In general terms, environmental inspection is the process of checking compliance with the relevant legal and technical requirements, checking the compliance between the scopes of activity and permitting – i.e. evaluating whether the conditions of permitting are complied -, and encouraging compliance of the enterprise with the environmental legislation, for the purpose of determining whether the Environmental Law and its provisions and the relevant regulations are applied, by reviewing the activities of the enterprises.

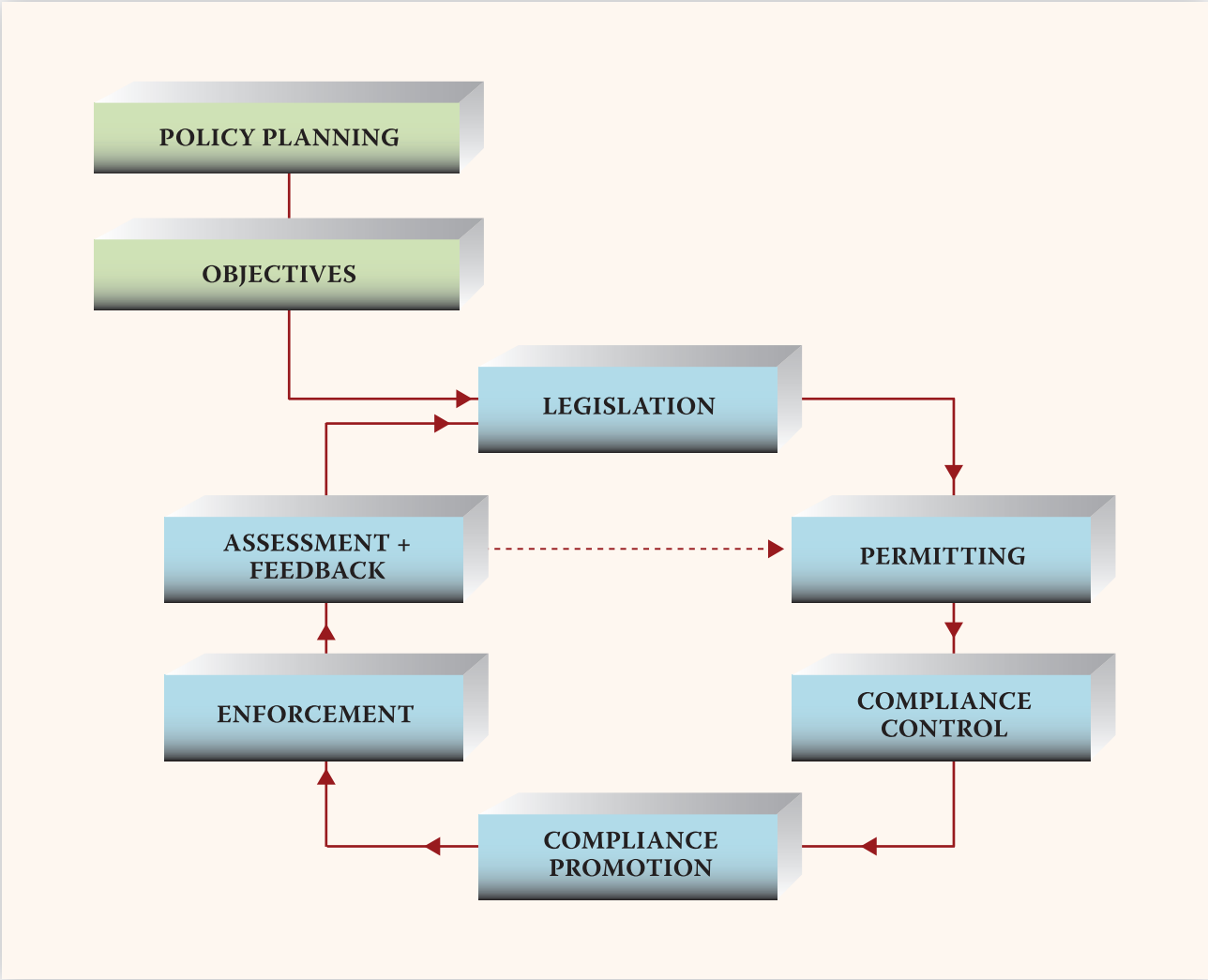


Figure 2 – Regulatory Cycle

Figure 2 demonstrates the regulatory cycle that is conseptual structure for Recommendation of the European Parliament and of the Council on providing for minimum criteria for environmental inspections in the Member States.

At the global level, while the policy development and determination of strategies and objectives in the process of environmental management covering the protection of environment and prevention of pollution can be handled based on the environmental problems both at national and international levels, they can also be performed at local/regional/basin or enterprise level.

In order to be able to reach the objectives that are determined in line with the environmental policy of the country, arrangements should be made so as to cover all aspects of the environment and the environmental legislation, i.e. laws, regulations and statements, should be prepared. After the come into force of the Ministerial legal and administrative arrangements that protect environment and prevent pollution, activities and/or facilities will start working upon the receipt of permissions to be taken from the responsible body. Then, the extent to which the activities and/or facilities comply with the legislation should be inspected, the capabilities of the enterprisers in complying with the legislation should be checked, the problems in the implementation of the legislation should be detected, and measures should be taken in this respect. Within this framework, the determination and implementation of the scope and procedure of environmental inspection are the most important method in the protection of environment and prevention of pollution. In the case that any non-compliance is detected during any inspection, the administration should impose sanctions on the activity and/or facility.

In the consequence of all these inspections works, the activities of inspection and enforcement should be reviewed, the results should be assessed, and necessary amendments should be made in the existing regulation and/or in the conditions of permission for the relevant activity or facility if it is deemed necessary in the light of the assessment. Therefore, for the regulatory cycle to be completed, it is very important to make annual and multi-year inspection plans within the framework of a certain plan and to make an annual assessment regarding the inspections activities.

National, regional or local reports prepared by the inspection authorities may have different objectives and may be useful for different target groups:

① REPORTING TO THE PUBLIC:

The first objective of reporting the inspection and enforcement activities is to announce to the public how the environmental quality is protected by guaranteeing of compliance with environmental rules by the competent authorities. The reports also provide information to the public about the enforcements and the measures taken in the case of non-compliance and about the enforcement measures taken by the competent authorities to guarantee compliance in the future.

② REPORTING AS AN ADMINISTRATIVE TOOL:

The second objective of reporting to evaluate the work carried out by the competent authority and the way in which the funds and human resources are used based on the inspection plan.

In addition, the report generally shows whether the inspection policy is applied as stated in the inspection plan; thus it is revealed whether the inspection activities are carried out in accordance with the inspection policy. The report, especially the chapters of assessment and results, should partially produce the necessary information for the creation of future objectives and the planning of financial and

human resources; thus efficient and target-driven use of financial and human resources is ensured.

③ REPORTING AS A FEEDBACK TO THE LEGISLATION:

The third objective of reporting is to provide feedback to the responsible authority about the efficiency of the legislation on environmental protection upon the receipt of relevant permission and about whether the rules in the legislation are formulated sufficiently and appropriately. It implies that another objective of reporting is to analyze the efficiency of the legislation and the conditions of permission.

④ REPORTING AS A FEEDBACK TO THE CENTRAL LEVEL:

The forth objective of reporting is to assess the inspection activities nationally and to provide feedback to the government or to central level about how and to what extent the inspection authorities have fulfilled their responsibilities.

⑤ REPORTING BY THE MEMBER STATES TO THE EUROPEAN COMMISSION:

The fifth objective of reporting is the fulfillment of the reporting obligations by the member states (For example; obligations arising from the European Commission regulations such as EMAS, SEVESO-II, and IPPC). This book does not include such a reporting.

3- ACTIVITIES OF ENVIRONMENTAL IMPACT ASSESSMENT

EIA process includes the assessment of place and technology alternatives for the designed projects and the necessary measures to be taken for the minimization of the impacts of the activity.

Within the framework of the By Law on Environmental Impact Assessment (BLEIA), the Ministry takes one of the decisions of either EIA Positive or Negative regarding the projects within the scope of the list in Annex 1; and the Governorships, i.e. PDEUs, takes one of the decisions of either EIA Required or Not Required regarding the projects within the scope of the list in Annex 2.

Picture 1- The process of assessment within the scope of BLEIA is important for the facilities to operate in compliance with the environmental legislation.

Table 1 demonstrates the distribution by sectors of the EIA decisions made within the framework of BLEIA by the Ministry in 2011. As it can be seen from the table, 297 Environmental Impact Assessment Positive Decisions and 4,592 Environmental Impact Assessment Not Required Decisions were made in this process.

Table 1 – Sectoral distribution of the EIA Decisions made within 2011

Decision	Mining	Energy	Industry	Agriculture Food	Waste Chemistry	Tranportation Coast	Tourism Housing	TOTAL
EIA Positive	74	57	31	59	38	23	32	314
EIA Not Required	2.136	300	770	737	305	87	257	4.592

As it can be seen from Table 2, 44 project dossiers in the BLEIA Annex 1 List were returned to their owners in the consequence of the assessments of the Ministry in the process within 2011 as the site selections were considered as inappropriate.

Table 2 - Sectoral distribution of returned EIA project dossiers within 2011

Decision	Mining	Energy	Industry	Agriculture Food	Waste Chemistry	Tranportation Coast	Tourism Housing	TOTAL
Returned Project Dosiers	12	12	6	2	11	1	0	44

Figure 3 indicates the sectoral distribution of the projects for which EIA Positive decisions were made under BLEIA in 2011. As it can be seen from Figure 3, the projects in the mining sector has a significant share (23.57%) among other projects for which EIA Positive decisions were made by the central organization of the Ministry. The projects in the mining sector are followed by the projects in agriculture-food sector by 18.79% and the projects in the energy sector by 18.15%.

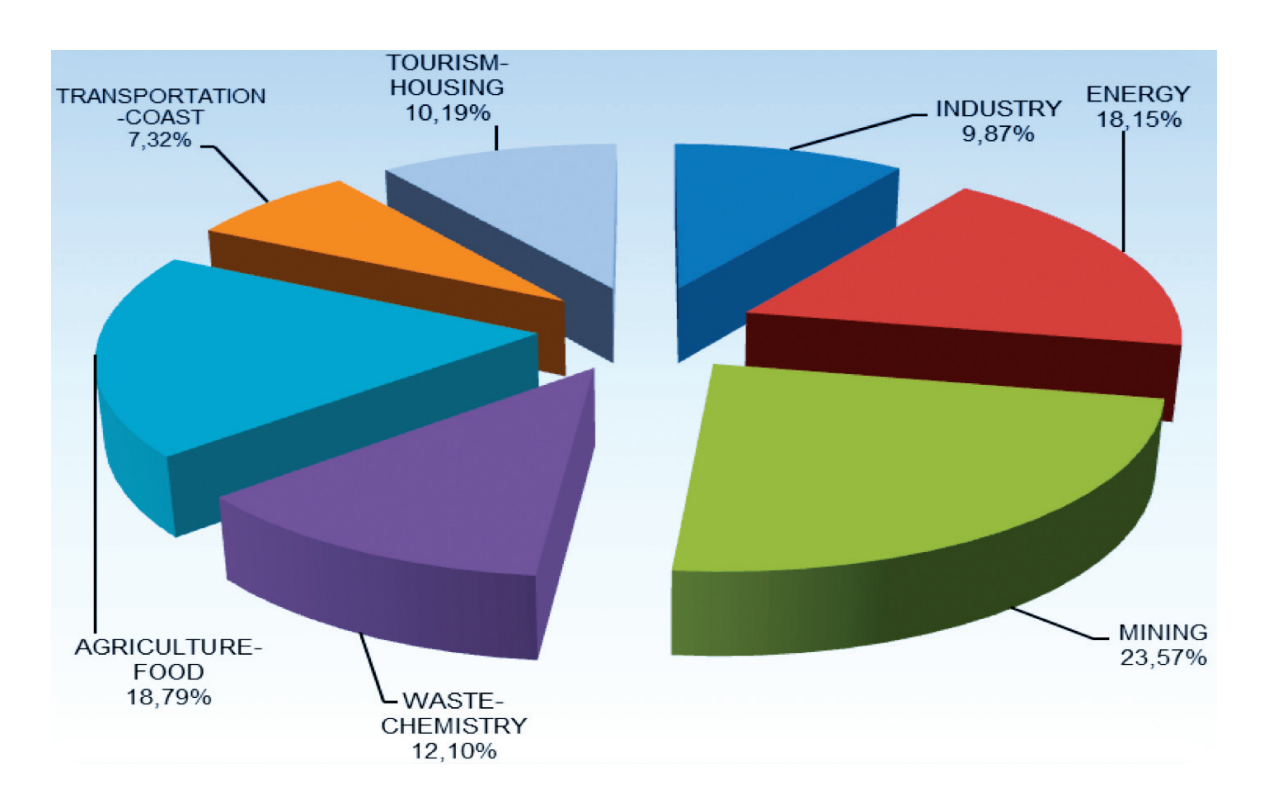


Figure 3 – Sectoral distribution of the projects for which EIA Positive Decisions were made.

Figure 4 indicates the sectoral distribution of the projects for which EIA Not Required decisions were made by the PDEUs in 2011. The projects in the mining sector have a big share (46.52%) among other projects in other sectors, for which EIA Not Required decisions were made. Within this scope, 2,136 EIA Not Necessary decisions were take for the projects in mining sector. In terms of the EIA Not Required decisions made in 2011, the mining sector is followed by the industry sector (16.77%) and agriculture-food sector (16.05%).

When Figures 3 and 4 are evaluated together, it can be seen that the sector with the highest number of applications to the Ministry and to the provincial directorates under BLEIA in 2011 is the mining sector. In the applications made under BLEIA, the mining sector is followed by the industry sector and agriculture-food sector.

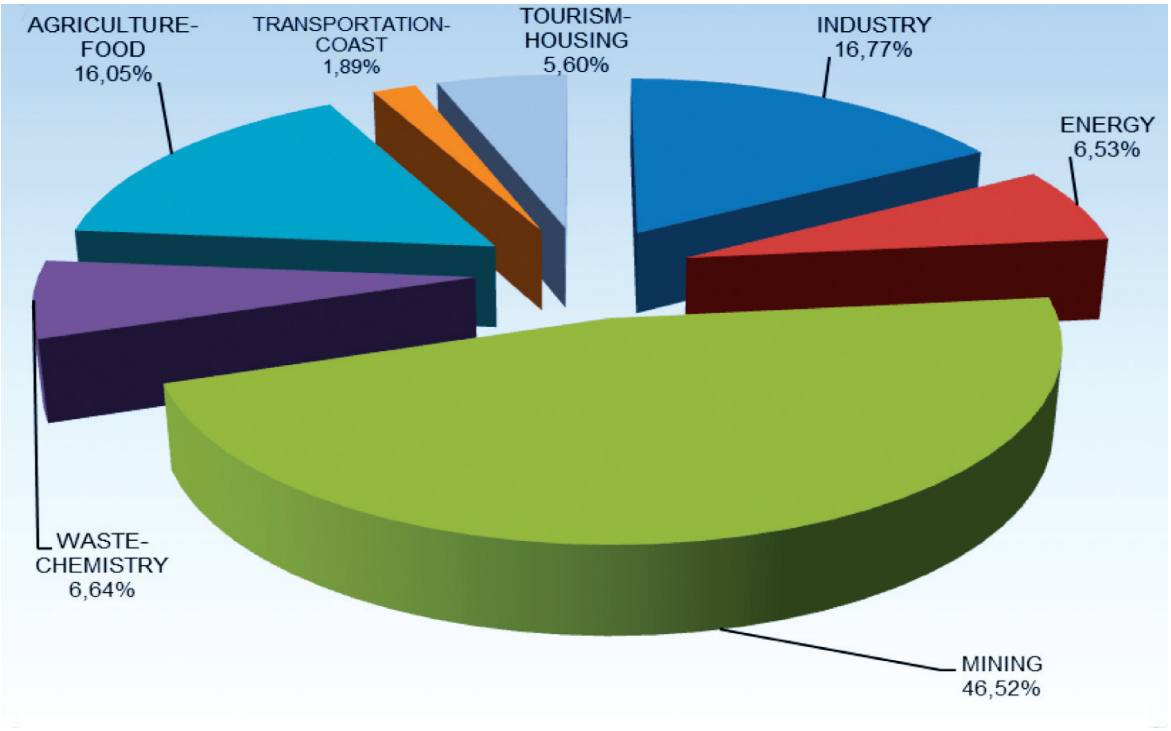


Figure 4 – Sectoral distribution of the projects for which EIA Not Required decisions were made.

Picture 2 – A heap leaching area inspected under BLEIA

Works have been started under DGEIAPI in order for the applications for EIA process to be made on electronic environment for the purposes of faster and more efficient finalization of transactions under BLEIA, decreasing bureaucracy and waste of time, and eliminating paper waste; within this framework, DGEIAPI will carry out a project (e-EIA project) in 2012. Following the finalization of this project, it is targeted that all EIA applications will be made online in 2013 and e-EIA certificates/decisions will be also given on electronic environment both by the Ministry and by the PDEUs; for that reason, some changes will be made on BLEIA.

4- PERMITTING&LICENSING ACTIVITIES

In 2006, works were started for the grant of a single environmental permit by having an integrative approach towards the 5 different environment-based permits and 18 different licenses given by the central organization of the Ministry and the provincial directorates, and thereby for decreasing the bureaucratic procedures. As a result of this, "By Law on the Permit and Licenses Required by the Environmental Law (BLPLREL)" was prepared for the grant of a single environmental permitting instead of the various environment-based permits and licenses which were required for the activities and facilities that caused environmental pollution; this by law was promulgated in the Official Gazette no. 27214 of 29 April 2009 and came into force on 1 April 2010. Since that date, a single Environmental Permit/Environmental Permit and License was started to be given on electronic environment within the framework of an integrative approach.

The activities and facilities in the list in Annex 1 of the BLPLREL are given Provisional Activity Certificates (PAC) and Certificate of Environmental Permit/Environmental Permit and License by the Ministry; those activities and facilities in the list in Annex 2 are given PAC and Certificate of Environmental Permit/Environmental Permit and License by the Provincial Directorates of Environment and Urbanisation (PDEU). Within the framework of the By Law on the Permits and Licenses Required by the Environmental Law, the central organization of the Ministry and the PDEUs have granted Provisional Activity Certificates (PAC) to 2,240 enterprises or facilities and Certificates of Environmental Permit/Environmental Permit and License to 811 enterprises or facilities. Table 3 provides data on PACs and Environmental Permit/Environmental Permit and License for 2011.

Table 3 – Number of Provisional Activity Certificates and Certificates of Environmental Permit/Environmental Permit and License granted in 2011

	TOTAL	ANNEX-1	ANNEX-2
Provisional Activity Certificates	2,240	416	1,824
Certificate of Environmental Permit/Environmental Permit and License	**811**	**115**	**696**

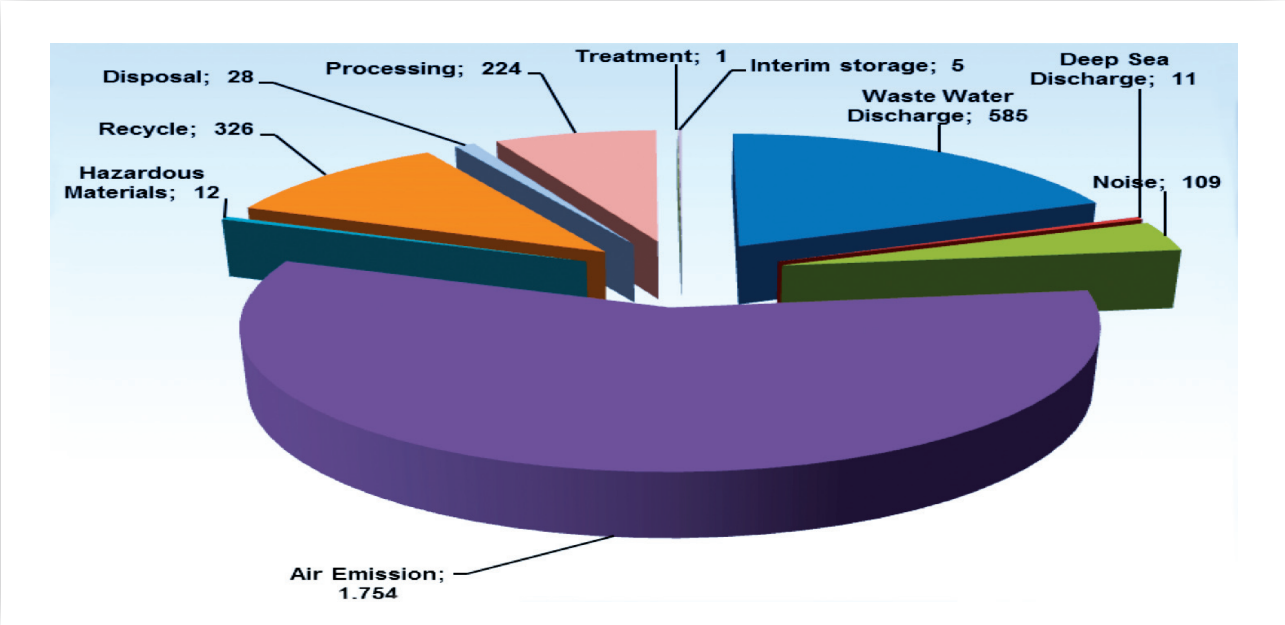


Figure 5 – Distribution by the subjects of the permit and licenses of the Provisional Activity Certificates granted in 2011

Figure 5 shows the distribution by the subjects of permit and license of the Provisional Activity Certificates granted in 2011. Within the framework of BLPLREL, 1,754 activities or facilities, whose applications were found positive, were granted PACs in the area of air emission in 2011.

Within the scope of the PAC given to the enterprises whose applications were found positive under BLPLREL, there can be one or more subjects of permit and license depending on the sector of the enterprise or faclities and on the sources of emission given to the receiving media. Therefore, the total number of PACs in Figure 5 is higher than 2,240.

Figure 6 shows the sectoral distribution of the PACs granted in 2011; as it can be seen from the figure, the Waste Management Sector has the biggest share in the sectoral distribution of PACs.

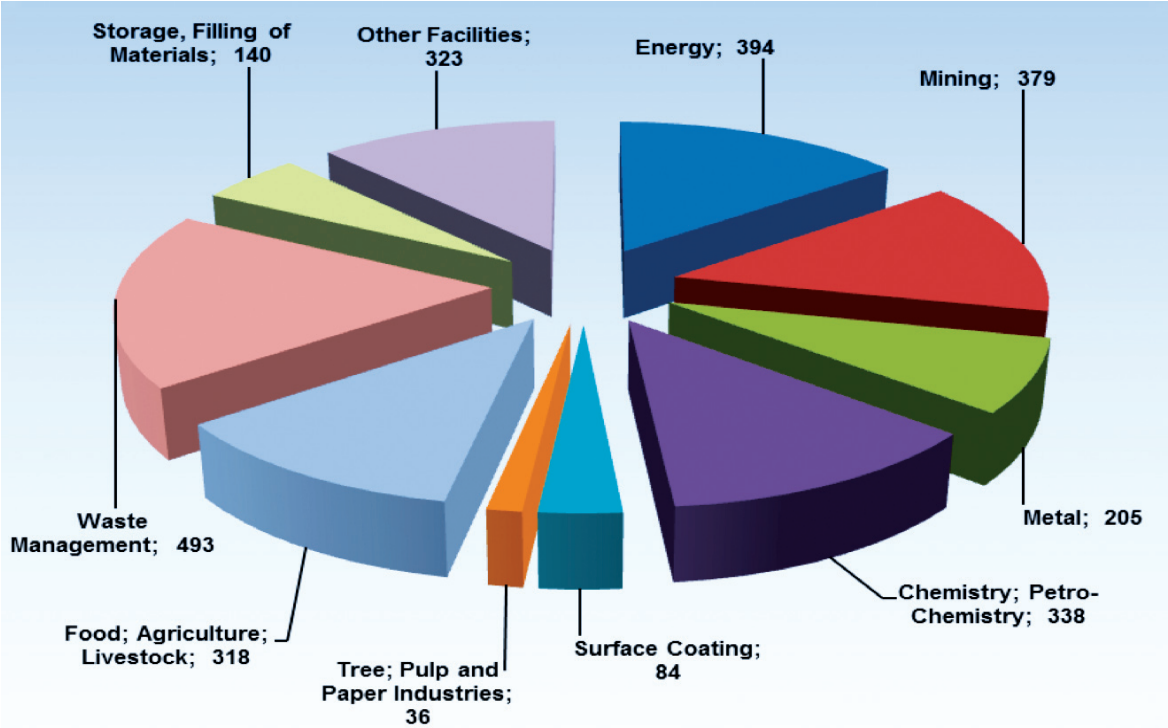


Figure 6 – Sectoral Distribution of the Provisional Activity Certificates granted in 2011

Figure 7 shows the distribution by the subjects of permit and license of the Certificates of Environmental Permit/Environmental Permit and License granted in 2011. In this period, the subject of air emission constitutes the biggest share in the Certificates of Environmental Permit/Environmental Permit and License.

Figure 8 shows the sectoral distribution of the Certificates of Environmental Permit/Environmental Permit and License granted in 2011. In this period, Certificates of Environmental Permit were given to 135 enterprises in the Mining and Construction Materials Industry, 133 enterprises in Chemistry and Petro-chemistry Industry, 116 enterprises in the Energy Industry, and 114 enterprises in the Food, Agriculture and Livestock sector. Similarly, 198 enterprises were granted Certificates of Environmental Permit and License in the sector of Waste Management in the mentioned period.

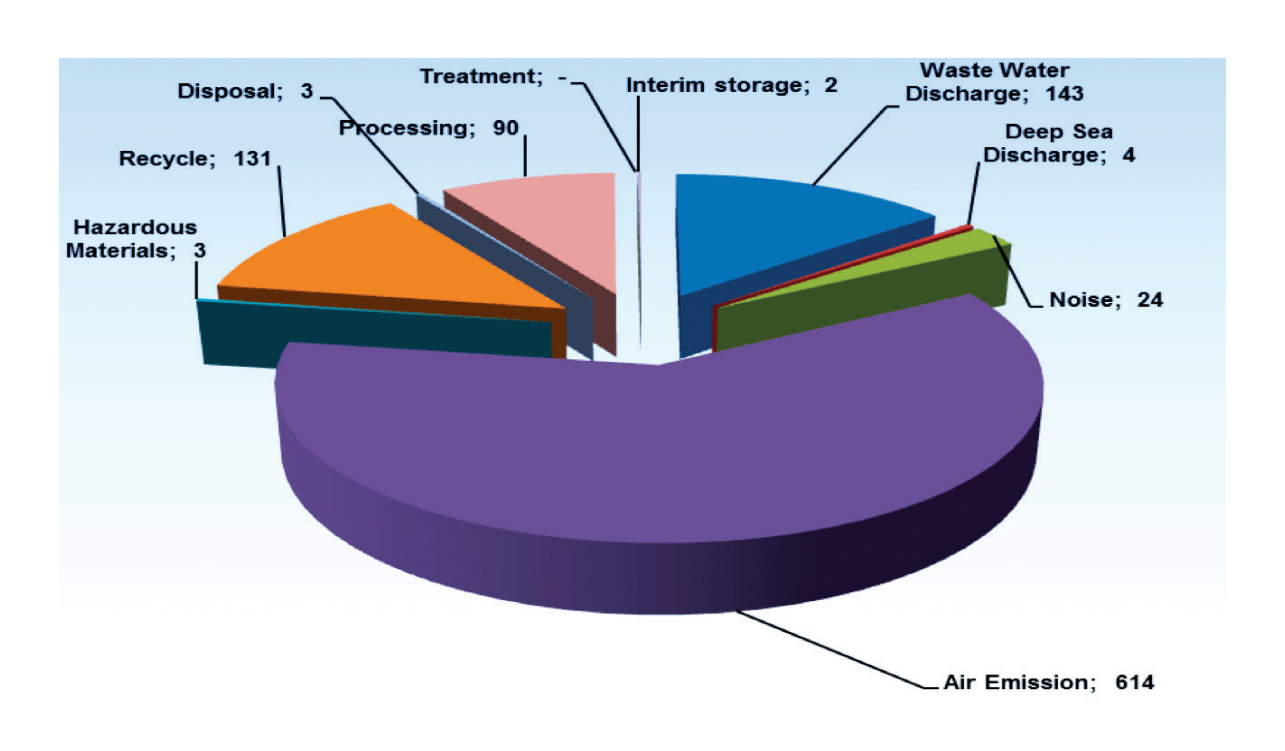


Figure 7 - Distribution by the subjects of the permit and licenses of the Certificates of Environmental Permit/Environmental Permit and License granted in 2011

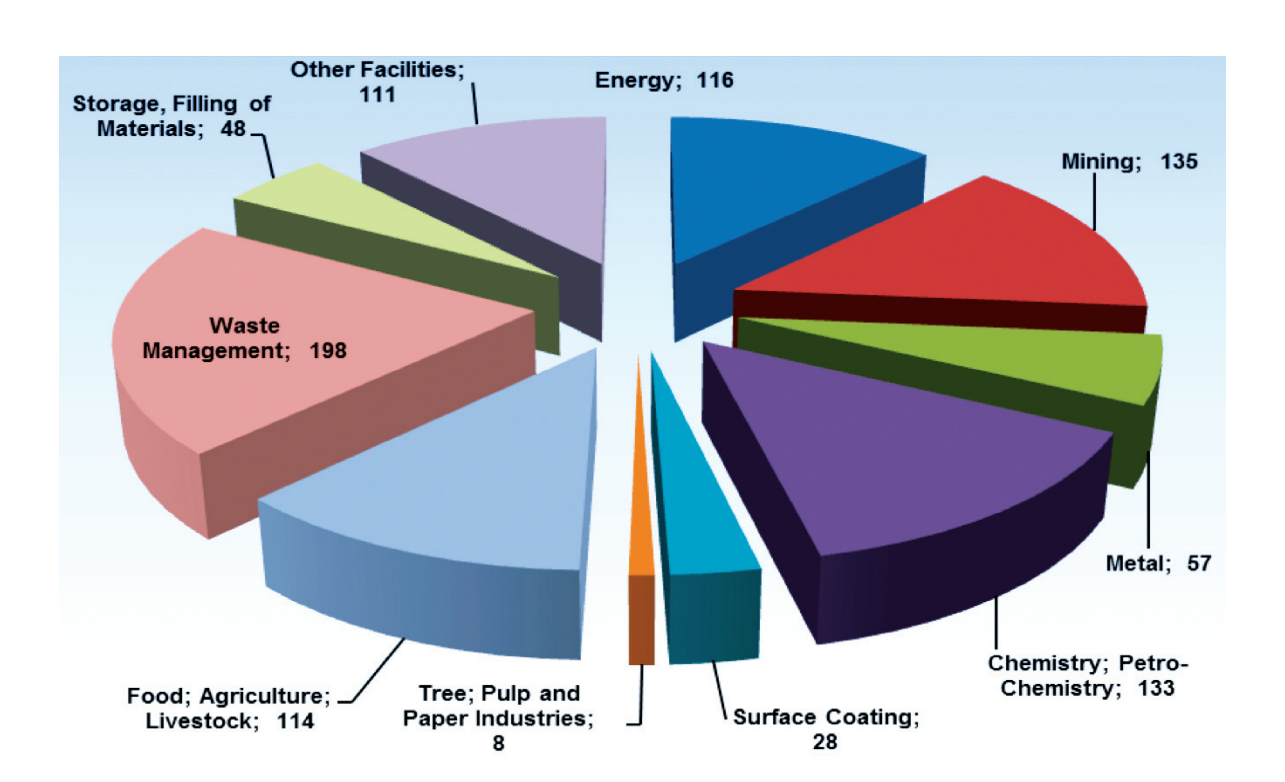


Figure 8 – Sectoral Distribution of the Certificates of Environmental Permit/Environmental Permit and License granted in 2011

On *http://www.csb.gov.tr/gm/ced/,* you can reach information on the names of the enterprises that have received PACs and the enterprises or facilities that have received Certificates of Environmental Permit/Environmental Permit and License, their address, contact details, provinces of the facilities, scope of the annex they pertain to, subjects of environmental permit and license, waste codes, dates of the issuance of the certificates, and expiry dates of the certificates.

5- INSPECTION ACTIVITIES

In the assessment of the inspection activities within the scope of this report, the inspections carried out by the central organization of the Ministry and/or by the PDEUs were divided into two: routine (planned) inspections and non-routine (unplanned) inspections.

Routine inspections are made within the framework of annual or multi-year programs and they can be informed or uninformed. Non-routine inspections are made suddenly

a) As a part of the permitting renewal procedure,

b) As a part of the procedure for getting a new permit,

c) Following accidents and events (such as fire or sudden pollutions),

d) In the cases that any regulatory non-compliance is detected,

e) If deemed necessary by the Ministry or by the PDEUs,

f) Upon the receipt of any notifications or complaints.

And they are carried out by the central organization of the Ministry and/or PDEUs without depending on any program.

The General Directorate of Environmental Impact Assessment, Permit and Inspection was established to perform inspections under the Ministry pursuant to the provision "To evaluate the environmental impacts of all activities and facilities that cause or have the potential to cause pollution by leaving solid, liquid or gas wastes in the receiving medias as a result of their activities; to monitor the mentioned facilities and activities, to grant permits, to inspect, and to ensure noise control", which is stated in Article 2/c of the Decree Law no. 644 on the Organization and Duties of the Ministry of Environment and Urbanisation.

Within this framework, below are the data on the environmental inspections carried out by the Directorate General of Environmental Impact Assessment, Permit and Inspection (DGEIAPI) and the Provincial Directorates of Environment and Urbanisation (PDEU).

5.1. Inspection Activities of the General Directorate of Environmental Impact Assessment, Permit and Inspection

Figure 9 shows the organizational chart of the DGEIAPI under the Ministry of Environment and Urbanisation, which was established on 04 July 2011.

5.1.1. Activities of the Environmental Inspection Section

In 2011, both combined and media based environmental inspections were performed within the scope of the By Law on Environmental Inspection (BLEI) by the 17 technical staff members of the Department of EIA Monitoring and Environmental Inspection under the General Directorate of Environmental Impact Assessment, Permit and Inspection.

The combined inspections[1], which have been implemented since 2004 by the Ministry, are defined as follows;

[1] Since IPPC (Integrated Pollution Pacvention and Control) Directive is not being implemented yet, the system is called as "combined" rather than being "integrated".

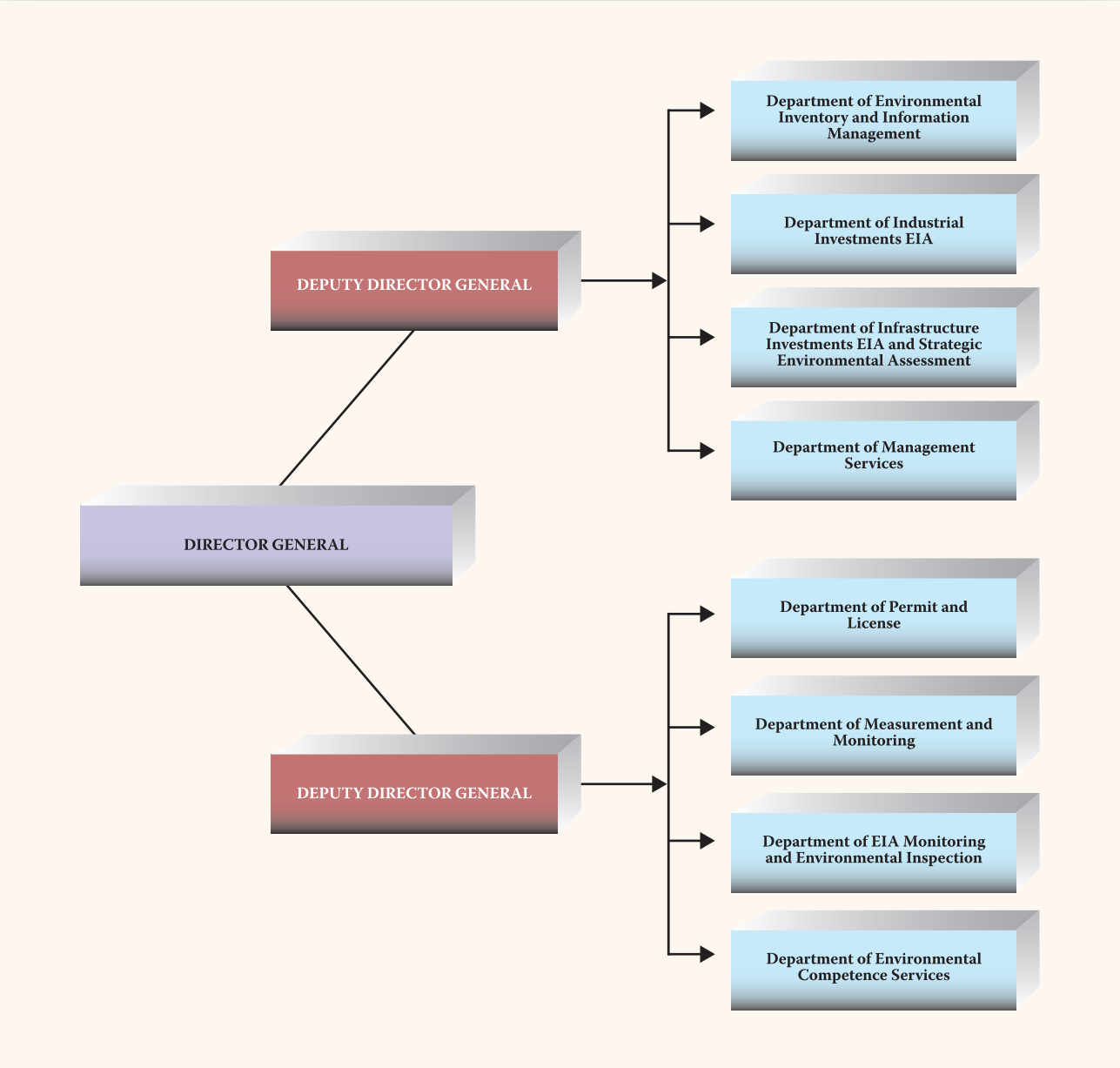


Figure 9 – Organization chart of the General Directorate of EIA, Permit and Inspection

> *"Combined inspections check the compliance of the facilities or activities with the Environmental Law and with all by laws about air, water, soil, waste, chemicals, sea and noise that have been come into force on the basis of the Environmental Law"*

In addition to the combined inspections, the media based inspections are defined in the BLEI as follows;

> *"Media based inspections check the compliance of the facilities and activities with the Environmental Law and with one of the by laws about air, water, soil, waste, chemicals, sea and noise that have come into force on the basis of the Environmental Law"*

Table 4 shows data on the integrated and media based inspections made by the Environmental Inspection Section in 2011.

Table 4 – Number of Combined and media-based inspections performed by the central organization

TYPE OF INSPECTION	NUMBER OF INSPECTION
Combined	65
Water	20
TOTAL	85

Ministerial Approval no. 3 was granted on 4 January 2011 for the 2011 Combined Inspection Program in accordance with Article 22 of the By Law on Environmental Inspection, which was come into force on 1 January 2009 by promulgation in the Official Gazette no. 27061 of 21 November 2008; and combined inspections were applied on 60 facilities within the scope of 2011 Combined Inspection Program and the mentioned annual inspection program was implemented successfully. Furthermore, combined inspections were also made in 5 facilities that were not included in the inspection program. Table 5 shows the provincial distribution of the combined inspections carried out by the central organization of the Ministry.

Table 5 – Provinces in which combined inspections were made by the central organization of the Ministry.

PROVINCE OF THE INSPECTION	NUMBER OF INSPECTIONS
Adana	2
Ağrı	2
Amasya	1
Aydın	1
Bursa	5
Denizli	2
Eskişehir	5
Gaziantep	5
Hatay	2
İstanbul	3
İzmir	8
Kırklareli	4
Kocaeli	6
Konya	5
Kütahya	1
Manisa	2
Mersin	2
Sivas	1
Tekirdağ	7
Uşak	1
TOTAL	**65**

Within the framework of the basin inspections made under the media-based inspections in 2011, 20 inspections of water pollution were made in Ergene Basin. The mentioned work was performed between 3 and 7 May 2011 by 2 teams in the Mobile Water and Waste Water Analysis Laboratory of the Department of Measurement and Monitoring.

Picture 3 – Mobile analysis laboratory for water and waste water.

Within the scope of the mentioned inspections, the facilities to be inspected were determined in the consequence of the meetings with the relevant technical staffs in the Provincial Directorates. Samples were taken from the waste water discharge points of the inspected facilities and these samples were analyzed. The results of the analyses were assessed in line with the discharge standards laid down in the By Law on Water Pollution Control; administrative enforcements were imposed on the facilities that did not meet the discharge standards.

Table 6 shows the provincial distribution of the water pollution inspections carried out in Ergene Basin.

Table 6 – Provinces in which water pollution inspections were made by the central organization of the Ministry.

PROVINCE OF INSPECTIONS	NUMBER OF INSPECTIONS
Edirne	5
Kırklareli	7
Tekirdağ	8
TOTAL	20

Picture 4 – A View from Ergene River on which basin monitoring was performed.

Picture 5 – Water Sampling During the Basin Monitoring.

5.1.2. Activities of the EIA Monitoring and Control Section

By Law on Environmental Impact Assessment (BLEIA) was come into force by repealed the General Directorate of Environmental Impact Assessment and Planning (DGEIAP) by promulgation in the Official Gazette no. 26939 of 17 July 2008. The mentioned by law defines the monitoring and control activities as follows;

Monitoring and control activities include all of the works carried out in the construction, operation and post operation processes, following the making of the decisions of "Environmental Impact Assessment Not Required" or "Environmental Impact Assessment Positive", to ensure the execution of the project without negatively affecting the environmental values and in line with the conditions constituting the basis for the decisions.

Ministerial Approval B.18.0.EIA.0.03.01-220-229 of 10 February 2011 was granted regarding the EIA monitoring and control activities carried out within 2011. The approval regarding the EIA monitoring and control activities is not specific to the projects/facilities, but it is based on the provinces in which inspection is planned. Authorization Approvals were granted for 44 monitoring and control works in 2011 and 664 projects and/or facilities were inspected in this respect.

Picture 6 – Training practise for environmental inspection.

As it can be seen in Table 7, DGEIAPI made 74 decisions of Environmental Impact Assessment Positive and 570 decisions of Environmental Impact Assessment Not Required in 2011; these 644 facilities were inspected within the scope of BLEIA monitoring and control work.

Table 7 – Sectoral distribution of the facilities that were inspected under EIAR in 2011

Decision	Mining	Energy	Industry	Agriculture Food	Waste Chemistry	Tranportation Coast	TOTAL
Number of inspections for the facilities granted EIA Positive decision	24	34	12	0	1	3	**74**
Number of inspections for the facilities granted EIA Not Required decision	317	154	43	28	27	1	**570**

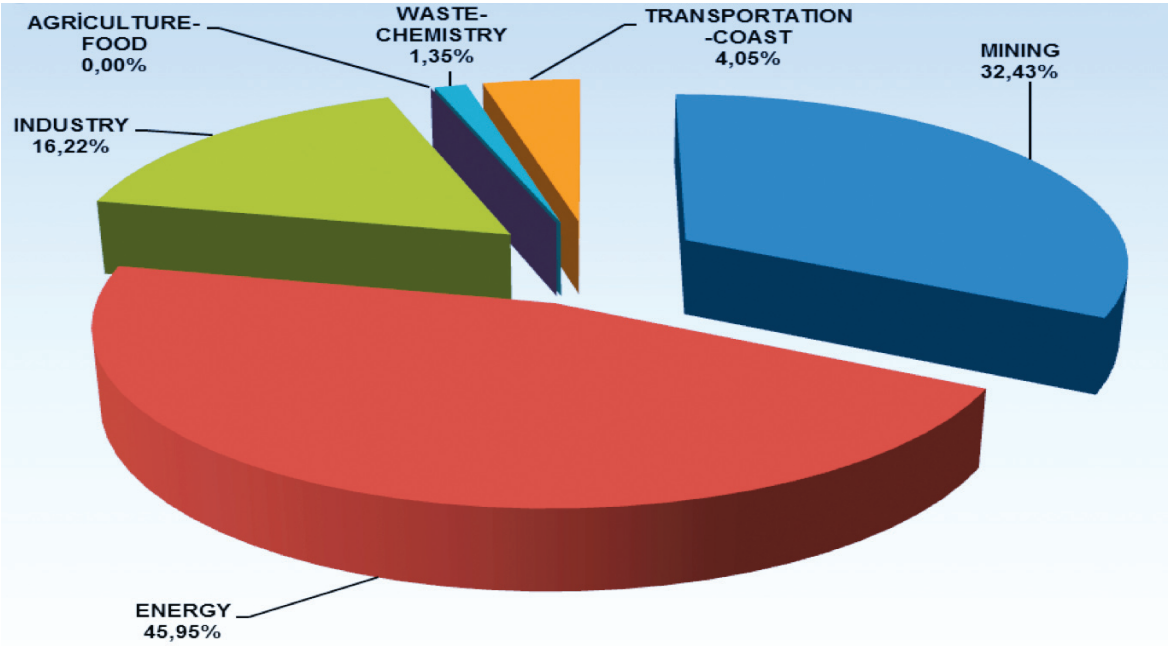


Figure 10 – Sectoral distribution of the inspections of the facilities granted EIA Positive decision.

Figure 10 gives the sectoral distribution of the EIAR Annex 1 facilities that were inspected under 2011 EIA Monitoring-Control Program and received EIA Positive Decision. Figure 10 shows that the sector with the highest number of facilities inspected under 2011 Monitoring-Control Program is energy sector by a share of 45.95% and it is followed by the mining sector whose share is 32.43%. In 2011, 57 facilities in the energy sector and 74 facilities in the mining sector were granted EIA Positive Decision. The sectors with high numbers of EIA Positive Decisions have higher number of facilities inspected by the central organization of the Ministry.

Picture 7 – Training course for sampling from hazardous waste for the staff of the Provincial Directorates.

Picture 8 – Measurement of the emission from the chimney of an iron-steel facility during an environmental inspection.

Figure 11 shows the sectoral distribution of the inspections of the facilities that were granted EIA Not Required Decision under 2011 EIA Monitoring-Control Program. In 2011, 2,136 decisions of EIA Not Necessary were granted for the mining sector and the mining sector had the biggest share (55.61%) in terms of inspections carried out under 2011 EIA Monitoring-Control Program. As it can be concluded from this result; although many decisions of EIA Not Required were made for the mining sector in 2011, many inspections were carried out on the mining sector facilities that were granted EIA Not Necessary Decision and their activities are under control.

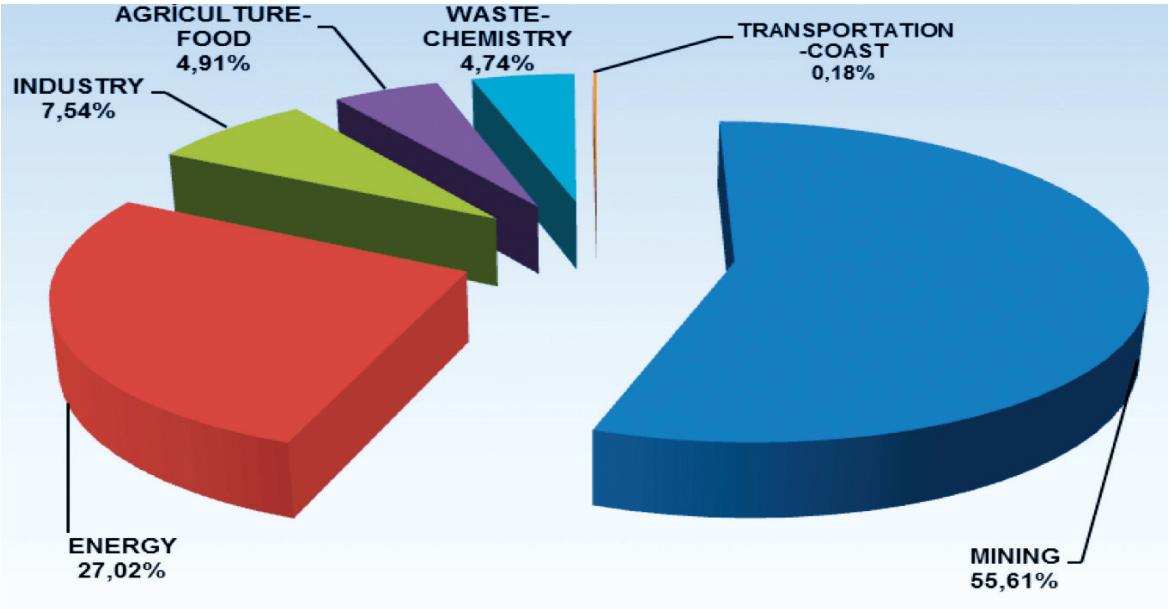


Figure 11 – Sectoral distribution of inspection of the facilities that were granted EIA Not Required decision.

Similarly, 770 EIA Not Required Decisions were granted for the industry sector and 300 EIA Not Required Decisions were granted for the energy sector in 2011 while the industry sector had a share of 7.54% and the energy sector had a share of 27.02% in terms of the inspections on the facilities that were granted EIA Not Required Decision under 2011 EIA monitoring and control program.

5.1.3. Activities of the Section for the Inspection of Facilities with Major Industrial Accident Risk

"The By Law on the Control of Major Industrial Accidents" was promulgated in the Official Gazette no. 27676 of 18 August 2010, following a process of harmonization with "the Council Directive 96/82/EC of 9 December 1996 on the Control of Major-Accident Hazards Involving Dangerous Substances" (Seveso II Directive). "The Section for the Inspection of Facilities with Major Industrial Accident Risk" was established for the first time under the Department of EIA Monitoring and Environmental Inspection of the GDEIAPI by the Decree Law no. 644 promulgated in the Official Gazette no. 27984 of 4 July 2011 in order to perform the works and

transactions relating to the inspections of the Seveso organizations/facilities for the implementation of the above-mentioned regulation, and thus in order to ensure, through periodical checks, the control of the measures that are taken or should be taken for the prevention of any possible accident, in compliance with the provisions of the regulation for humanity and environment.

Picture 9 – Inspection by the mobile water and waste water analysis team of the Ministry

As of the mentioned date, the mentioned Section has performed the following works until the end of 2011:

- Site visit to the storage facilities of Ipragaz-Ankara, Habaş and Totalgaz, together with the Department of Chemicals of the Directorate General of Environmental Management (DGEM/DC).

- Organizing a meeting together with DGEM/DC on 18 November 2011 on the demand of the Istanbul Chamber of Industry. In the mentioned meeting, the section staff presented the draft Communiqué of Inspection and information about its works.

- Site visits to Aygaz A.Ş. Yarımca Filling Facility and Solventaş Teknik Depolama A.Ş. facilities on 22-23 December 2011. Information was received on the works carried out in the transition period in the visited facilities and recommendations were made.

- Participation in the following trainings regarding the Control of Major Industrial Accidents on 01-02 December 2011;
  - Risk Assessment,
  - Accident Scenarios
  - Explosion and Fire Modelling.

- Within the scope of the Draft Communiqué of Inspection and the by law revision works:
  - A pre-negotiation/pre-assessment meeting was held with the Labor Inspectorate Board of the Ministry of Labor and Social Security (MLSS) prior to the formation of opinions.
  - The opinions were formed and sent to the MLSS.

5.1.4. Activities of the Market Surveillance and Inspection Section

Market surveillance and inspection (MSI) is the inspection by the competent bodies of whether the products are produced in compliance with the relevant technical regulations and whether they are secure in the process of placement of the products on the market or distribution of the products to the market or when the product is on the market.

The main objective of the market surveillance and inspection is the protection of the consumers from the products that have not been produced in line with the legislation. The target in an efficient market surveillance and inspection is not to inspect all the products, but to detect and inspect the products that have potential risks.

In order to ensure the central and coordinated performance of the market surveillance and inspection activities, the Market Surveillance and Inspection (MSI) Section was established in the presence of the repealed Ministry of Environment and Forestry in 2010. The inspection structure was strengthened by the Decree Law on the Organization and Duties of the Ministry of Environment and Urbanisation, which was come into force by promulgation in the Official Gazette no. 27984 of 04 July 2011; and the General Directorate of Environmental Impact Assessment, Permit and Inspection under the Ministry of Environment and Urbanisation was assigned "to carry out inspections in order to check the security of the products that fall within the area of responsibility of the Ministry and check their compliance with the relevant legislation and technical regulations; to make relevant bodies carry out inspections in this respect, and to ensure coordination between the competent organizations". In this framework, the mentioned Section performs its works under the Department of EIA Monitoring and Environmental Inspection.

Picture 10 – Inspection of the waste storage areas during a facility inspection by the Ministry.

Within the framework of the "National MSI Strategy Paper" prepared for the period of 2012-2014 and approved by the Coordination Committee for Market Surveillance and Inspection in the beginning of 2012, the products that our Ministry is responsible for are solid fuels, batteries, and accumulators. The works on the products that are under the responsibility of the Ministry are carried out in accordance with the By Laws that are in effect under the Environmental Law.

In this context, the inspections regarding solid fuels are carried out by the Provincial Directorates and the Municipalities, to which the Ministry has delegated authority to inspection, according to the "By Law on the Control of Air Pollution Arising from Warming" while the inspections regarding batteries and accumulators are carries out in the process of import according to the "By Law on the Control of Waste Batteries and Accumulators".

The Ministry inspected 1,064 bags and 1,028,618.16 tons of solid fuel in 2010. In 2011, 23,459,834 tons of solid fuel was inspected in 1,662 inspections carried out by the Ministry; and 9,814 samples were sent to laboratories for test. Various administrative enforcements were applied for 134,252 tons of solid fuels and ₺2,756,617 of fine was implemented in this respect.

5.2. Inspection Activities of the Provincial Directorates of Environment and Urbanisation

The Provincial Organization of the Ministry was designed in five (5) types in line with the Minister Approval B.09.0.SGB.0.10-010-06/1892 of 20 July 2011 on the Provincial Organization and Staff Distribution, which was granted by the Minister's Office to the Department of Strategy Development in accordance with the "Decree Law no. 644 on the Organization and Duties of the Ministry of Environment and Urbanisation" promulgated in the Official Gazette no. 27984 of 04 July 2011; Table 8 shows the environmental structuring of the Provincial Directorates.

While the environmental inspection of the provincial directorates under the Environmental Law had been carried out by the Environmental Management Sections and the EIA Sections until 4 July 2011, this situation was changed upon the establishment of the Ministry of Environment and Urbanisation. As shown in Table 8, new sections responsible for environmental inspections were created under the Provincial Directorates in the new structuring or sections Responsible for Environmental Management and Inspection were established.

This new structuring was an important and positive step following the change in the field of environment by "the Law no. 5491 on the Amendments on the Environmental Law", which was accepted by the Turkish Grand National Assembly on 26/4/2006, promulgated in the Official Gazette no. 26167 of 13 May 2006, and came into force in same time.

In this new structuring, new branches were created for carrying out inspections together with the decision-making units in the provincial directorates, and thus it was ensured that permitting and EIA decisions granted by different sections would be reviewed by a different section as a result of the environmental inspections. As the activities of granting permitting and/or licenses, EIA, etc. will be performed by a separate section, the efficiency of the environmental inspections will increase, because the unit responsible for environmental inspection will only focus on inspections.

Table 8 – Structure of the environmental divisions of PDEUs [2-3]

TYPE OF ORGANI-ZATION	PROVINCES	SECTIONS
Type A (3 Provinces)	Ankara, İstanbul, İzmir	a- Section Responsible for EIA Services, b- Section Responsible for Environmental Permit, c- Section Responsible for Environmental Inspections, d- Section Responsible for Environmental Management.
Type B (14 Provinces)	Adana, Antalya, Bursa, Diyarbakır, Erzurum, Eskişehir, Gaziantep, Mersin, Kayseri, Kocaeli, Konya, Sakarya Samsun, Şanlıurfa.	a- Section Responsible for EIA Services, b- Section Responsible for Environmental Permit, c- Section Responsible for Environmental Inspections, d- Section Responsible for Environmental Management.
Type C (11 Provinces)	Aydın, Balıkesir, Denizli, Elazığ, Hatay, Kahramanmaraş, Malatya, Manisa, Sivas, Trabzon, Van.	a- Section Responsible for EIA and Environmental Permit, b- Section Responsible for Environmental Inspections, c- Section Responsible for Environmental Management.
Type D (33 Provinces)	Adıyaman, Afyonkarahisar, Ağrı, Aksaray, Amasya, Batman, Bolu, Burdur, Çanakkale, Çorum, Edirne, Erzincan, Giresun, Isparta, Kars, Kastamonu, Kırıkkale, Kırklareli, Kırşehir, Kütahya, Mardin, Muğla, Muş, Nevşehir, Niğde, Ordu, Osmaniye, Rize, Siirt, Tekirdağ, Tokat, Yozgat, Zonguldak.	a- Section Responsible for EIA and Environmental Permit, b- Section Responsible for Environmental Management and Inspections.
Type E (20 Provinces)	Ardahan, Artvin, Bartın, Bayburt, Bilecik, Bingöl, Bitlis, Çankırı, Düzce, Gümüşhane, Hakkari, Iğdır, Karabük, Karaman, Kilis, Sinop, Şırnak, Tunceli, Uşak, Yalova.	a- Section Responsible for EIA and Environmental Permit, b- Section Responsible for Environmental Management and Inspections.

2 Provincial Directorates also have Natural Heritage Preservation Sections and some Provincial Directorates also have Sections for Special Environmental Protected Area.

3 Although the environmental structuring of the provincial directorates of Type A and Type B and the environmental structuring of the provincial directorates of Type D and Type E are the same, their structures relating to urbanisation are different.

Pursuant to Article 22 of the By Law on Environmental Inspection that was came into force on 1 January 2009 by promulgütion in the Offical Gazette no. 27061 of 21 November 2008, the 2011 Combined Inspection Program was approved for all provincial directorates by the Ministarial Consent no. 3 of 4 January 2011 and 1,385 facilities were included in the program.

Data on the planned (routine) and unplanned (non-routine) environmental inspections carried out by 81 PDEUs can be seen in Table 9, Figure 12 and Figure 13, respectively. Annex 3 and Annex 4 show the distribution of the number of inspections and type of inspections by the Provincial Directorates in 2011.

Table 9 shows that PDEUs performed 50,313 environmental inspections in 2011; 16,297 of these inspections were routine while 34,016 were non-routine.

Table 9 and Figure 12 indicate that monitoring and control activities under BLEIA constitute a high proportion (44.48%) of the routine inspections performed by the Provincial Directorates in 2011 and 7,249 inspections were carried out in this framework. These activities are followed by the routine inspections on air pollution by a share of 26.72%; 4,355 inspections were performed by the provincial directorates for the prevention of air pollution.

Picture 11 – On-site measurement of some parameters after sampling of water during site inspections.

Table 9 – Number of inspections carried out by PDEUs in 2011

Provincial Directorates	Combined	Air	Water	Soil	Waste	Chemicals	Noise	Deep Sea Discharge	EIA	TOTAL
Routine Inspections	1.389	4.355	1.030	175	1.506	17	572	4	7.249	16.297
Non- Routine (unplanned) Inspections	407	11.094	6·056	518	8.231	208	2.986	8	4.508	34.016
Grand Total	1.796	15.449	7.086	693	9.737	225	3.558	12	11.757	50.313

Figure 13 shows that the inspections in the field of air pollution have the biggest share (32.61%) among the non-routine inspections carried out by the PDEUs in 2011. Air pollution inspections are followed by waste management (24.20%) and water pollution (17.80%) inspections, respectively.

In the framework of non-routine inspections, PDEUs carried out 11,094 air pollution inspections, 8,231 waste management inspections, and 6,056 water pollution inspections; the total number of non-routine inspections is 34,016.

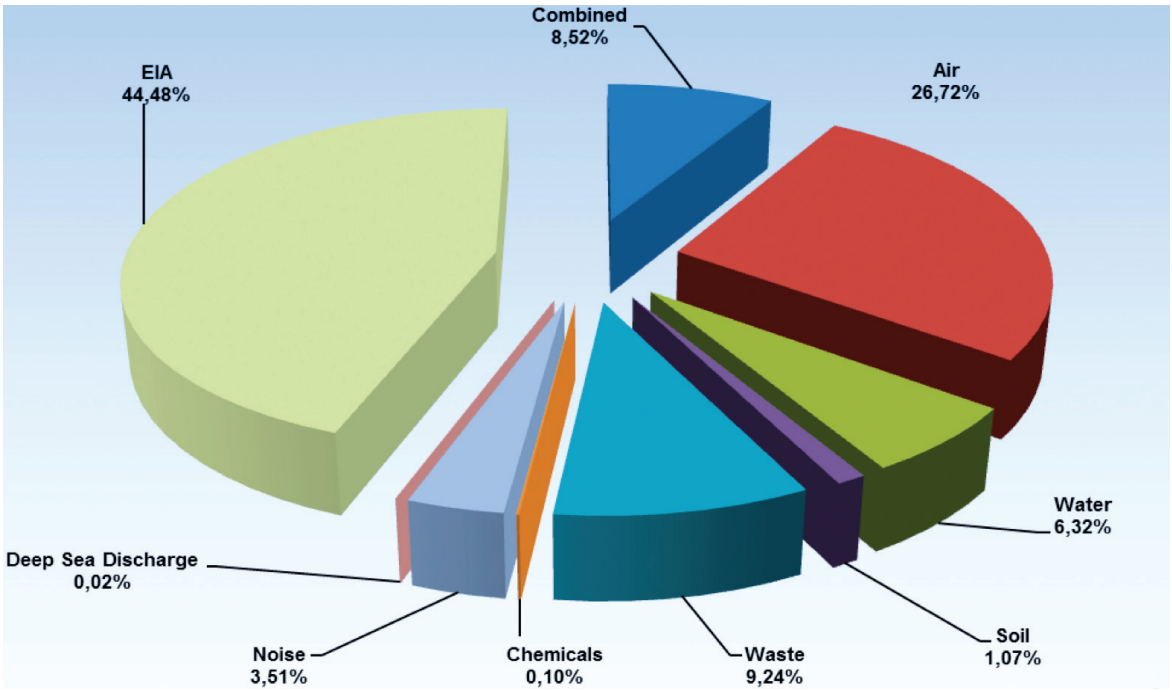


Figure 12 – Distribution of the routine inspections carried out by 81 PDEUs.

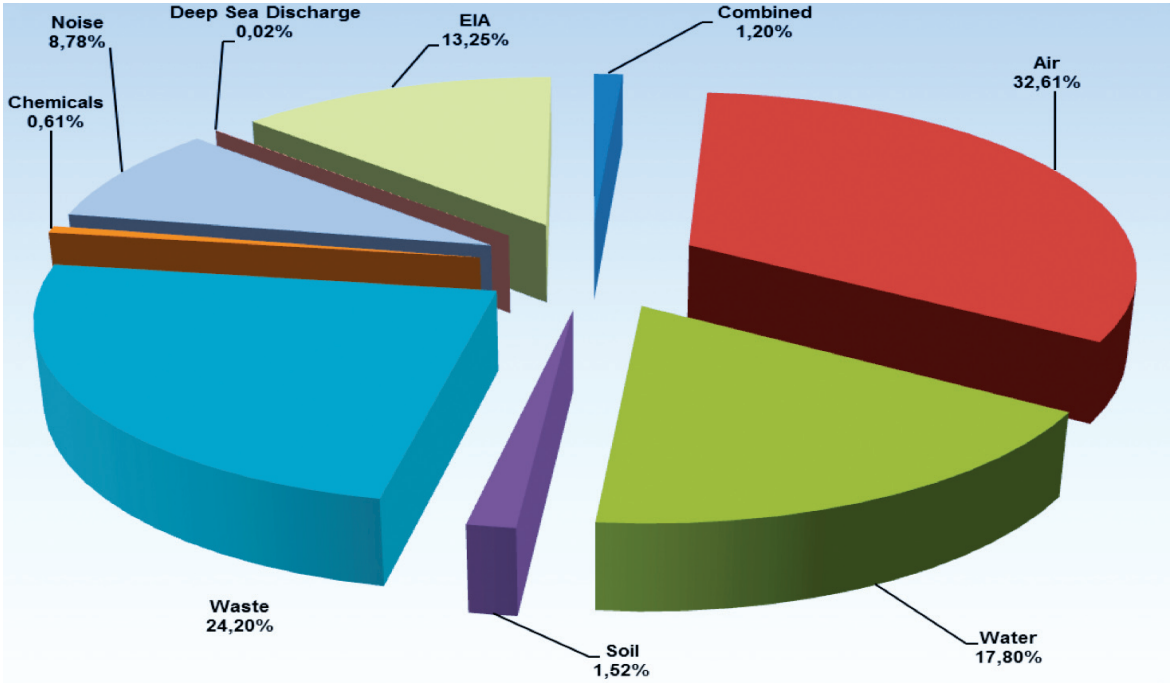


Figure 13 – Distribution of the non-routine inspections carried out by 81 PDEUs.

Figure 14 shows that air pollution inspections constitute a big part (30.71%) of the total environmental inspections performed by the PDEUs in 2011. Air pollution inspections are followed by the inspections under By Law on EIA (23.37%) and by the waste water inspections (19.35%).

Among the total environmental inspections carried out by the PDEUs in 2011, there are 15,449 air pollution inspections, 11,757 inspections under By Law on EIA, and 9,737 waste management inspections; total number of inspections is 50,313.

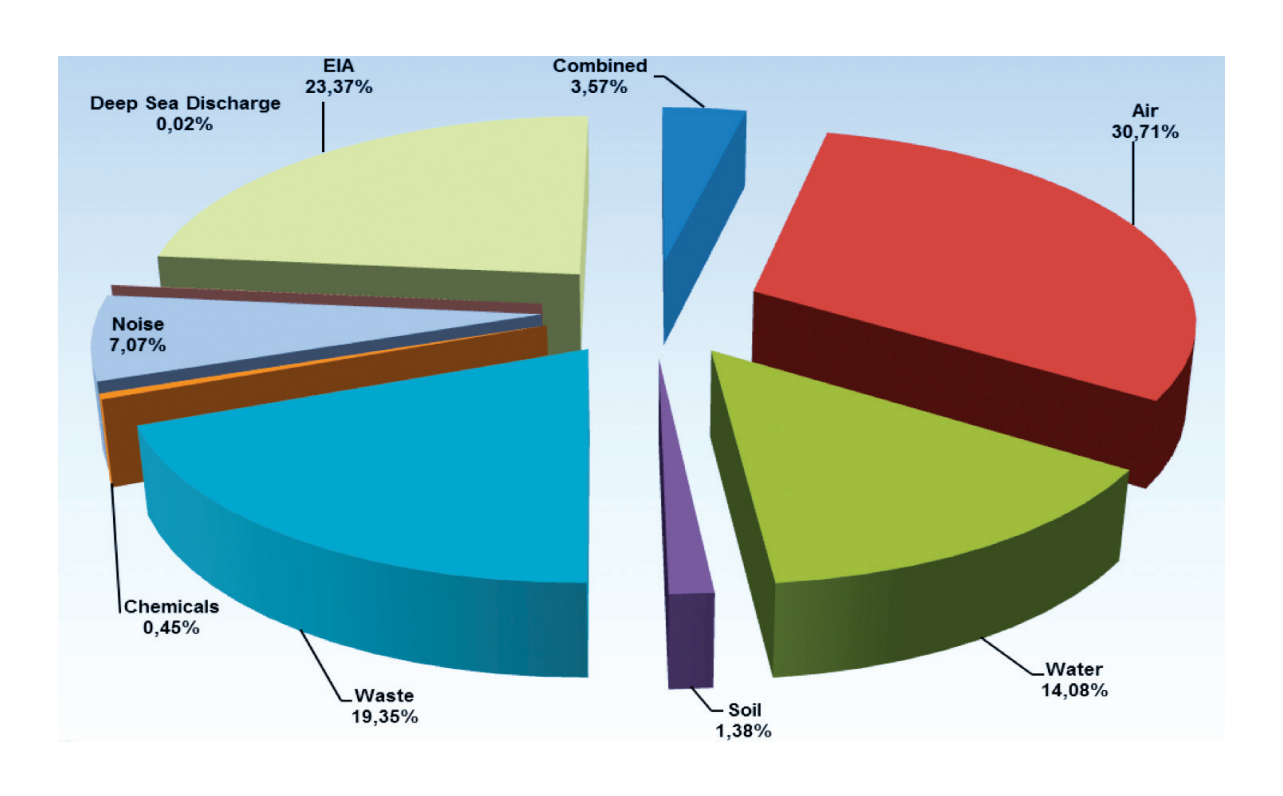


Figure 14 – Distribution of all inspections carried out by 81 PDEUs

In 2011, the PDEUs carried out 16,297 routine inspections and 34,006 non-routine inspections, totally 50,313 inspections. Figure 15 shows a comparison regarding the routine and non-routine inspections carried out by the PDEUs. As it can be seen from the mentioned figure, routine inspections constitute 67.61% of the environmental inspections carried out by the PDEUs in 2011 while the proportion of the routine inspections is 32.39%.

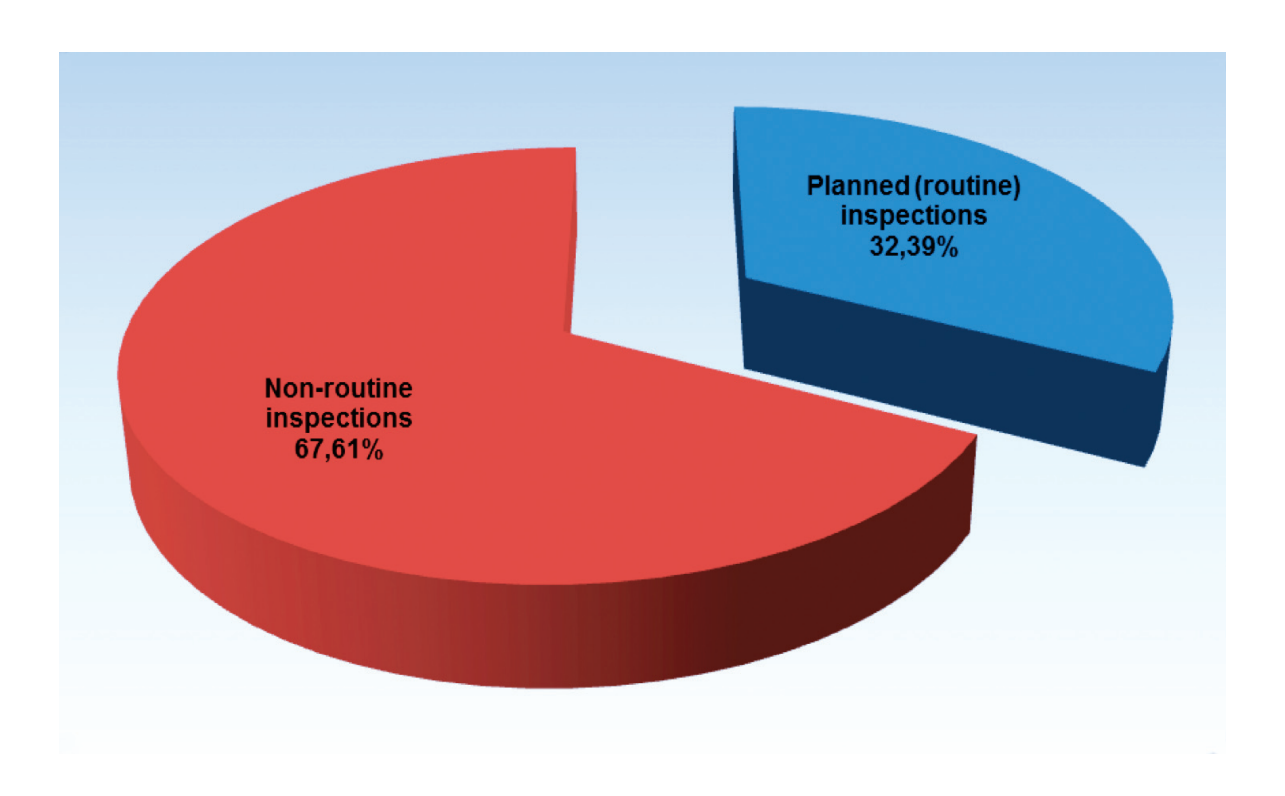


Figure 15 – A Comparison for PDEU inspections

Picture 12 – Inspection of waste storage area of a facility during environmental inspection.

Table 10 indicates the number of routine and non-routine inspections carried out by the provincial directorates in some provinces with high numbers of industrial facilities in 2011. As it can be seen in Table 10, only 32.39% (1/3) of the inspections were routine inspections when all the environmental inspections of PDEUs throughout Turkey are considered. In the big cities with intense industrial activities,

the situation is compliant with the general situation in Turkey; except for the inspections of the PDEUs in Istanbul and Izmir, most of the environmental inspections were non-routine. 69.26% of the environmental inspections of Istanbul PDEUs and 51.99% of the inspections of Izmir PDEUs were routine.

Table 10 – Number of inspections in some PDEU

PDEU	Number of Routine Inspections	Number of Non-Routine Inspections	Percentage of Routine Inspections (%)
Adana	613	1.758	25,85
Ankara	17	1.331	1,26
Antalya	40	1.512	2,58
Bursa	21	619	3,28
İstanbul	3.433	1.524	69,26
İzmir	965	891	51,99
Kocaeli	145	1.599	8,31
Tekirdağ	481	1.721	21,84
All PDEUs	**16.297**	**34.016**	**32,39**

For the environment to be managed in a healthy way, PDEUs should pay attention to increasing the rate of routine inspections both in the big provinces with intense industrial activities and in the other provinces of Turkey. Within this framework, the provincial directorates should prepare an environmental inspection program especially according to issues of environmental pollution and environmental problems that are in priority in their own provinces and they should direct the inspection activities in this framework. In addition to the routine inspection activities, the Provincial Directorates can also direct their non-routine inspections according to their priorities; they can determine the sectors in which they will carry out non-routine inspections according to the priorities of environmental pollution and environmental problems in their own provinces and they can focus on these sectors.

Table 11 shows the distribution by year of the environmental inspections carried out by the Ministry. According to the table, number of environmental inspections increased in 2011 despite there was a new structuring process. The stable increase in the number of the environmental inspections carried out by the Ministry continues. The number of the inspections carried out by the PDEUs in 2011 is nearly 5,600 more than the inspections in 2010. However, the central organization of the Ministry carried out nearly 300 less environmental inspections than in 2010. The basic reason for this is the transition period during the restructuring of the Ministry.

Table 11 – Distribution of the environmental inspections by year

UNIT	2009	2010	2011
Central Organisation of the Ministry	969	1.021	729
PDEUs	33.476	44.683	50.313
TOTAL	**34.445**	**45.704**	**51.042**

6- ASSESSMENT OF COMPLAINTS

Complaint inspections are performed in order to look into the resources and reasons of any complaints to the competent authority from local people, rivals, NGOs or other authorities.

The Ministry of Environment and Urbanisation evaluates the complaints coming to it through written letters, phone, electronic messages or BIMER; some of these complaints are finalized through the inspections of the central organization of the Ministry while the others are directed to the relevant provincial directorate or relevant institution or organization. Similarly, complaints can be also made directly to the PDEUs and such complaints are finalized by the PDEUs or by relevant institutions or organizations depending on the nature of the complaint.

Picture 13 – Analayzing of samples in the Environmental Reference Laboratory

Picture 14 – Sampling from sea water.

Table 12 and Figure 16 provide data on the number of complaints coming to the Ministry in 2011 and on the complaints that were finalized by inspections. While the total number of complaints coming to the Ministry in 2011 is 8,829, 7,355 of these complaints (83.31%) were finalized through the inspections of the Ministry. Other complaints were directed to relevant institutions and organizations depending on the nature of the relevant complaint.

According to Figure 17 which shows the distribution of the complaints coming to the Ministry in 2011, it can be seen that a big portion of the complaints (29.97%) is related to air pollution. Air pollution is followed by waste management (23.33%) and water pollution (18.35%). In 2011, the Ministry received 2,646 complaints about air pollution, 2,060 complaints about waste management, 1,620 complaints about water pollution, and 1,394 complaints about noise.

As defined in the "Report on the Frequency of Inspections" of the IMPEL, the complaint inspections are defined as "reactive inspections", together with the inspections that are carried out as a result of accidents, fires and sudden pollutions. Even if it is difficult to determine the inspection time to be spent as a result of such events, it is possible to determine it by investigating the time spent by the inspectors in similar

situations in the past. The inspection authority may allocate significant time for such inspections within the year; these results in a decrease in the time allocated for routine inspections.

Table 12 – All complaints coming to the Ministry in 2011 and their status of evaluation

	Air	Water	Soil	Waste	Chemicals	Noise	EIA	TOTAL
Number of complaints	2.646	1.620	207	2.060	57	1.394	845	8.829
Number of complaints that are finalized through inspection	2.088	1.465	127	1.914	55	951	755	7.355
Finalization of the complaints through inspections (%)	78,91	90,43	61,35	92,91	96,49	68,22	89,35	83,31

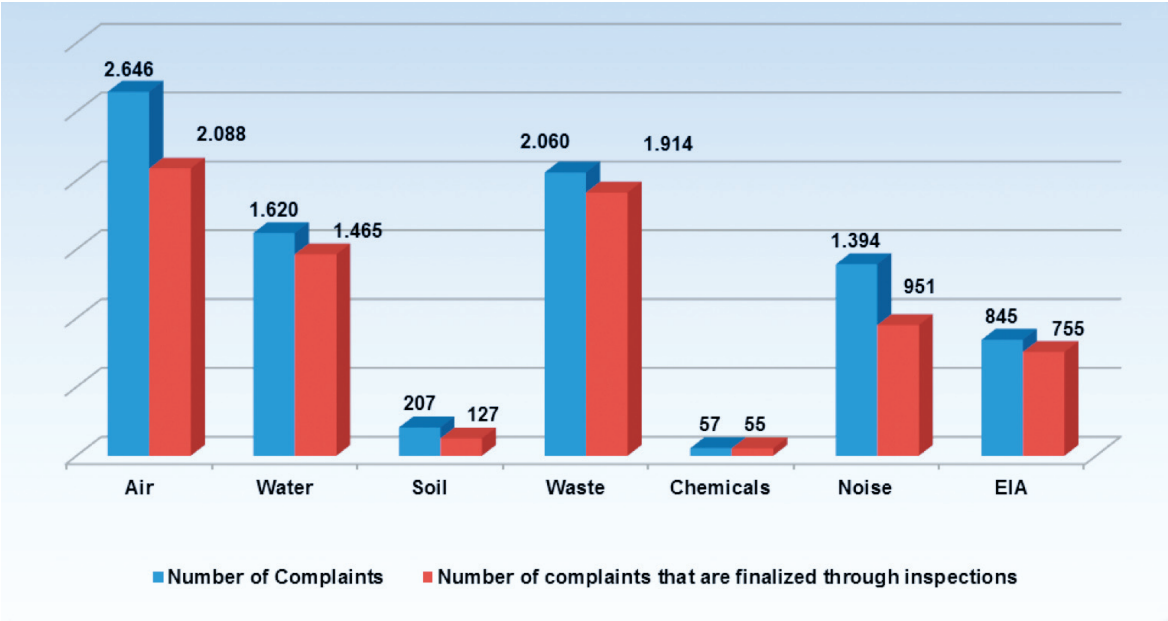


Figure 16 – The number of complaints coming to the Ministry and the number of complaints that were finalized with inspection

The Ministry carried out totally 51,042 environmental inspections in 2011; as it can be seen in Figure 18, 7,355 of these inspections (14.41%) are reactive inspections that are carried out upon the receipt of complaints. This is a high rate and it reveals that the complaints coming to the Ministry can direct the environmental inspections. However, when compared to the previous years, it is seen that there is a big decrease in the rate of complaint inspections in the total number of environmental inspections.

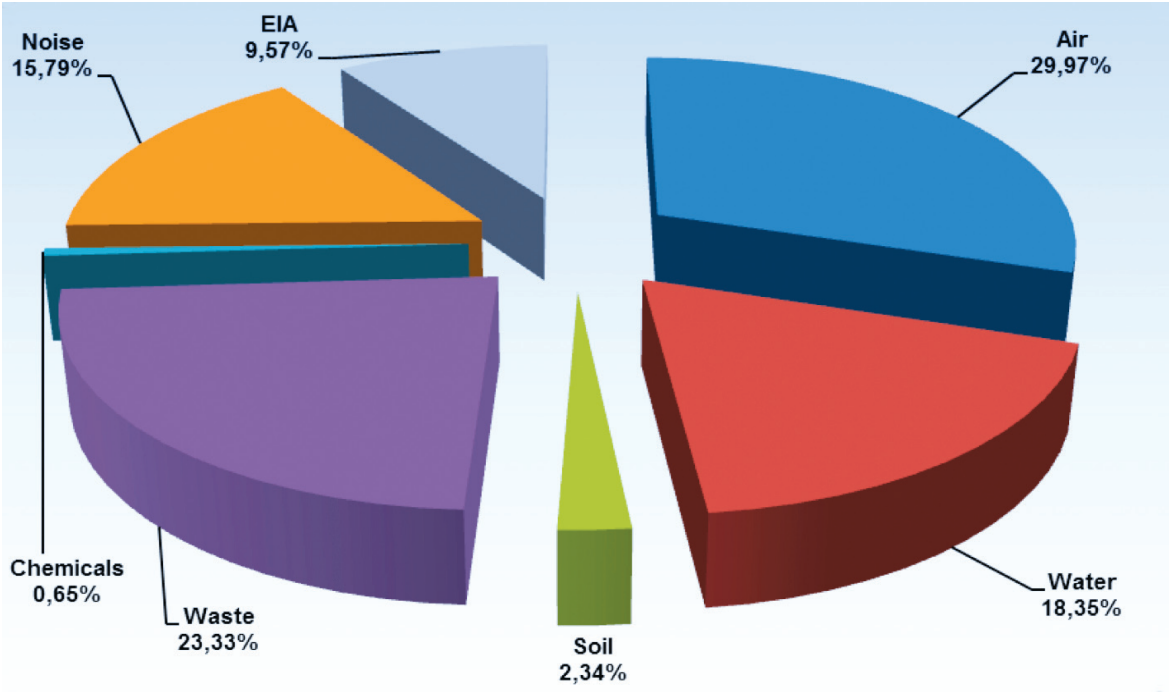


Figure 17 – Distribution of the complaints coming to the Ministry

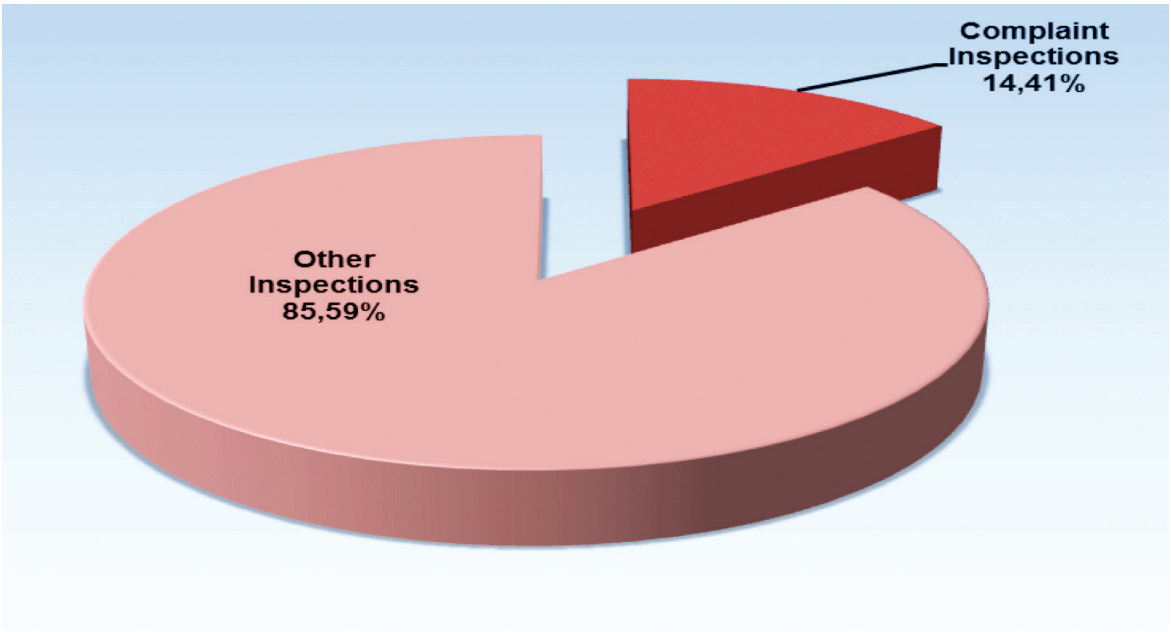


Figure 18 – Distribution of complaint inspections in the total number of inspections

When the data regarding the years of 2009, 2010 and 2011 are considered, it is seen that the number of complaints finalized with inspections constitutes nearly 80% of all complaints received by the central and provincial organizations in one year. This percentage varies among these years by ±2%.

Furthermore, it is also seen that there is a big decrease in the total number of complaints received by the Ministry in 2011 when compared to the number of complaints in 2009 and 2010. Nevertheless, reactive inspections carried out upon complaints have a big share (14.41%) in the total number of environmental inspections. If the inspections carried out upon complaints have a high rate in the total number of complaints, then the number of the non-routine inspections can be higher than the number of routine inspections; furthermore, the number of inspections, which the Ministry chooses to carry out suddenly depending on the environmental priorities, may decrease or it may even cause such inspections not to be performed any more.

7- ENFORCEMENTS UNDER ENVIRONMENTAL LAW

7.1. Applied Administrative Fines Under Environmental Law

In the event when any non-compliance is detected within the scope of the environmental legislation during the environmental inspecions carried out by the central ministry and provincial directories, administrative fines are implemented in accordance with Article 20 of the Environmental Law. As a result of the non-compliance detected within the year 2011, the administrative fines implemented due to the opposition to the Environmental Law has been carried out within the scope of the "Communique (2011/1) on Administrative Fines due to Environmental Law numbered 2872" issued in the Official Gazette dated December 25, 2010 and numbered 27796. The Communique for the administrative fines applied in the year 2011 is included in the Annex-2.

The administrative fines implemented due to the opposition to the Environmental Law as a result of the 729 inspections carried out in the year 2011 by DGEIAPI are seen in the Table 13. The amount of the fine implemented by DGEIAPI in 2011 is ₺4,292,737. The distribution of the said fines according to the types of the fines is seen in Figure 19.

Table 13 - The amount and the number of the fines applied by DGEIAPI in 2011

	Air	Water	Soil	Waste	Chemicals	Noise	Other	EIA	TOTAL
Amount of Fine (₺)	134.312	291.804	0	700.879	0	0	34.024	3.131.718	4.292.737
The Number of the Implemented Fines	4	12	0	8	0	0	6	164	194

When Table 13 and Figure 19 are analyzed, it is understood that the largest share among the administrative fines implemented by DGEIAPI is 164 non-compliances detected as a result of the monitoring control activities by EIA with the percentile of 72.95%. An administrative fine of ₺3,131,718 was implemented by DGEIAPI in 2011 due to the opposition to the By Law on EIA. By Law EIA violations are followed by the administrative fine of ₺700,879 implemented in the matter of waste management as a result of 8 non-compliances which were detected, and the share of this administrative fine is 16.33%. The fines implemented for waste management are followed by the administrative fine of ₺291,804 implemented in the matter of water pollution as a result of 12 non-compliances which were detected, and the share of this administrative fine is 6.80% in total. Furthermore, an evaluation related to the obligation of the facilities to employ environmental employees or to receive consultancy service during the inspections beginning from 2011 has been made. An administrative fine of ₺34,024 has been implemented as a result of 6 non-compliances which were detected accordingly.

The amounts of the fines implemented to the activities and/or facilities due to the opposition to the Environmental Law as a result of 50,313 inspections carried out by 81 PDEUs in 2011 are seen in Figure 20. The total sum of the fines implemented by PDEUs in 2011 is ₺52,136,032. The fine amounts and the number of the implemented fines according to the provinces in 2011 are included in the Annex-3.

Image 15 – Inspection of a waste water treatment plant

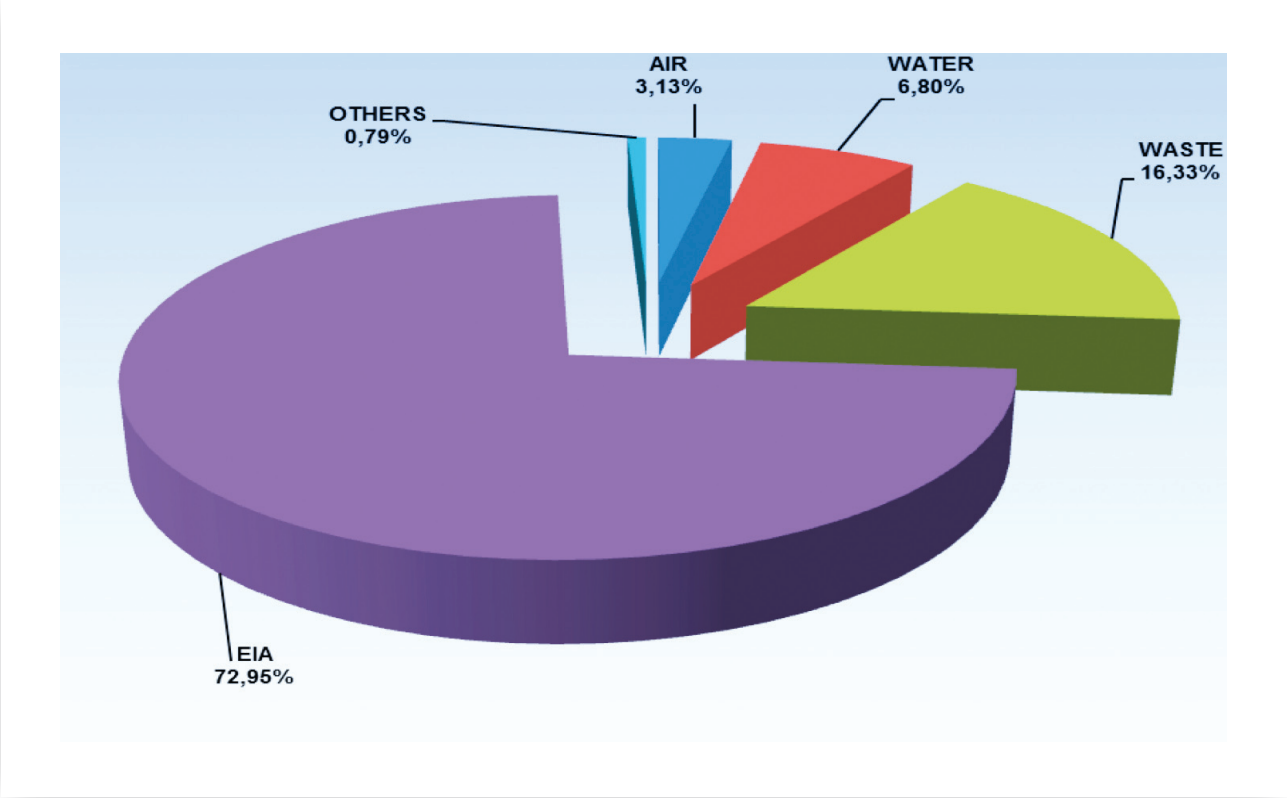


Figure 19 - The distribution of the fines implemented by DGEIAPI in 2011

Table 14 - The amount and the number of the fines implemented by PDEU in 2011

	Air	Water	Soil	Waste	Chemicals	Noise	Other	EIA	TOTAL
Amount of Fine (₺)	4.658.898	10.648.841	2.449.960	23.180.420	31.745	1.004.007	437.689	9.724.472	52.136.032
The Number of the Implemented Fines	910	229	98	337	1	76	88	472	2.211

When Table 14, Figure 20, and Figure 21 are analyzed, it is understood that the largest share in the administrative fines implemented by PDEUs in 2011 belongs to the matter of the waste management with the percentile of 44.46%. An administrative fine of ₺23,180,420 was implemented to the said activities and/or facilities as a result of the 337 non-compliances detected by PDEUs in the matter of waste management. The administrative fine implemented for the waste management is followed by an administrative fine of ₺10,648,841 imposed in the matter of water pollution as a result of 229 non-compliances which were detected. The share of the water pollution fines among all of the fines is 20.73% which is followed by the fines implemented within the scope of the By Low on EIA with the share of 18.65%. An administrative fine of ₺9,724,472 was implemented to the activities and/or facilities as a result of 472 non-compliances which were detected within the scope of By Low on EIA.

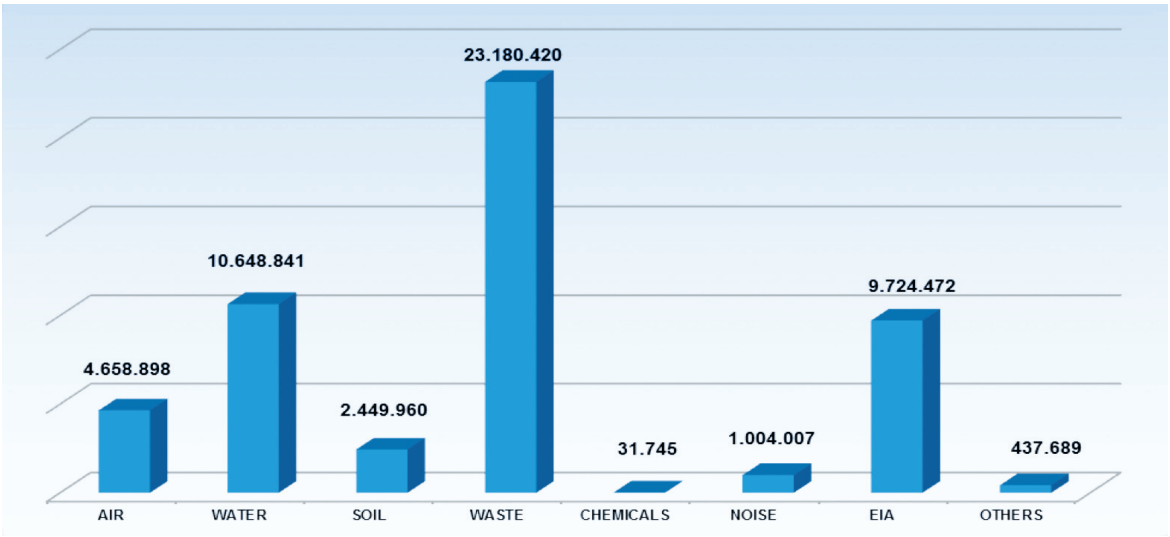


Figure 20 - The fines implemented by 81 PDEUs

As seen in the Table 15, an administrative fine of ₺56,428,769 was implemented as a result of a total 2,405 administrative fine implemented in accordance with Ministry of Environment and Urbanisaton in 2011. The types of the fines and the distribution of the fines related to the said fines are seen in Figure 22 and Figure 23.

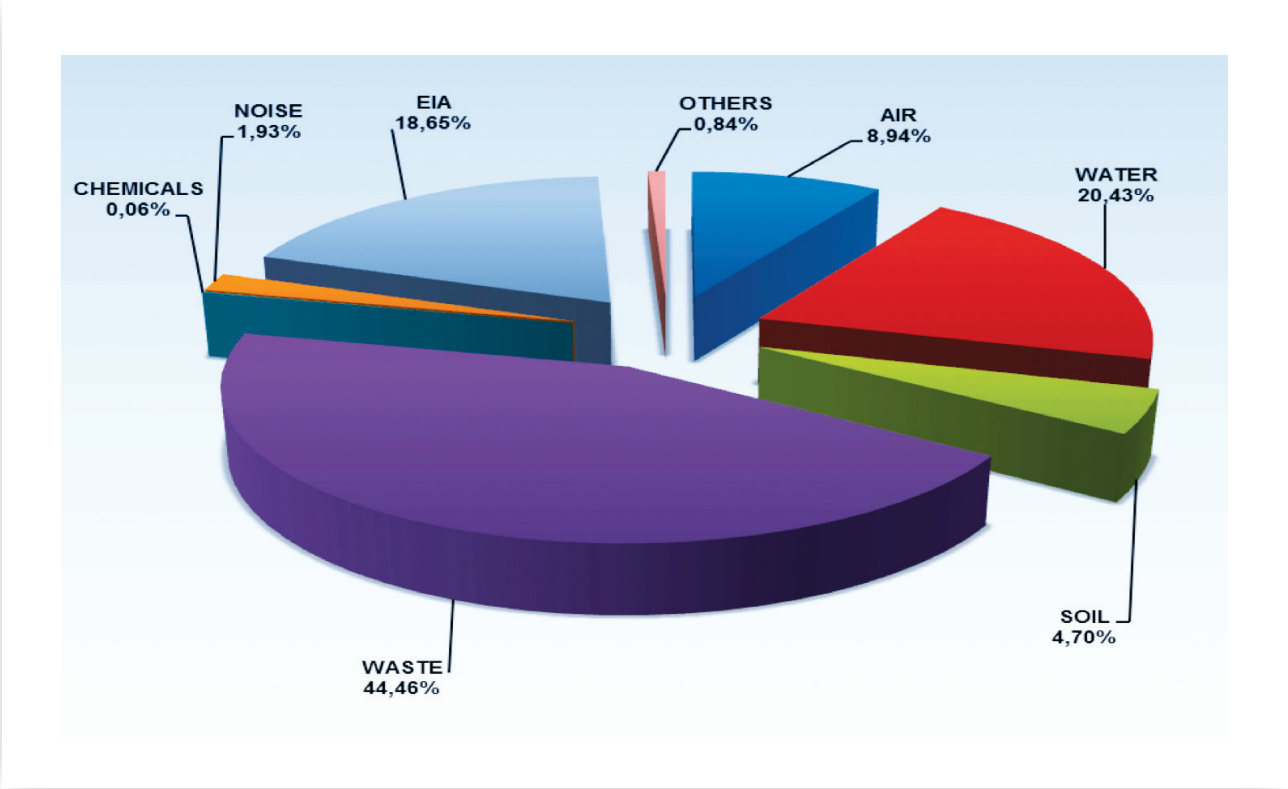


Figure 21 – The distribution of the fines implemented by 81 PDEUs

As seen in Table 15, the highest administrative fine was implemented in the matter of air pollution violations with an amount of 914, at the country level in 2011 by the central and provincial organizations of our Ministry. The air pollution is followed by administrative fines applied because of not obeying the water pollution provisions with an amount of 241 and because of the opposition to the provisions of BLEIA with an amount of 636.

Table 15 - The total amount and number of the fines implemented by the Ministry in 2011

	Air	Water	Soil	Waste	Chemicals	Noise	Other	EIA	TOTAL
Amount of Fine (₺)	4.793.210	10.940.645	2.449.960	23.881.299	31.745	1.004.007	471.713	12.856.190	56.428.769
The Number of the Implemented Fines	914	241	98	345	1	76	94	636	2.405

When Figure 22 which shows the amount of the total fines implemented by the Ministry is analyzed, the highest amount of the fine implemented by the Ministry organization beginning from 2011 was in the matter of waste management, and an amount of ₺23,881,299 was implemented in total. The matter of waste management is followed by the administrative fines implemented due to the violation of BLEIA with an amount of ₺12,856,190 which is followed by the administrative fines implemented in the matter of water pollution with an amount of ₺10,940,645

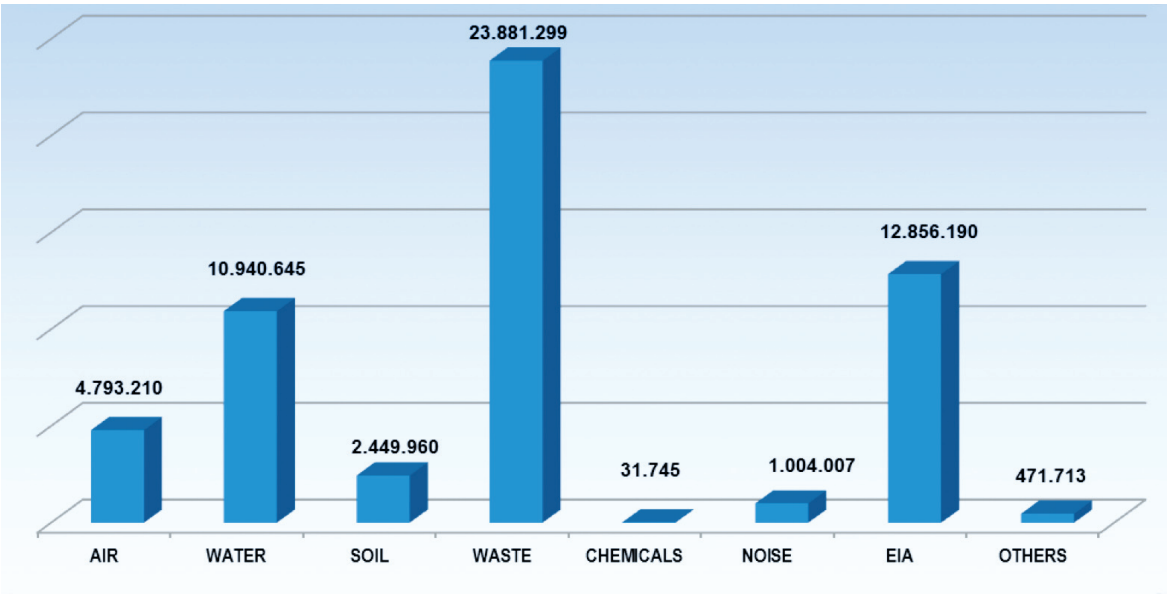


Figure 22 - The total amount of the fines implemented by the Ministry, (₺).

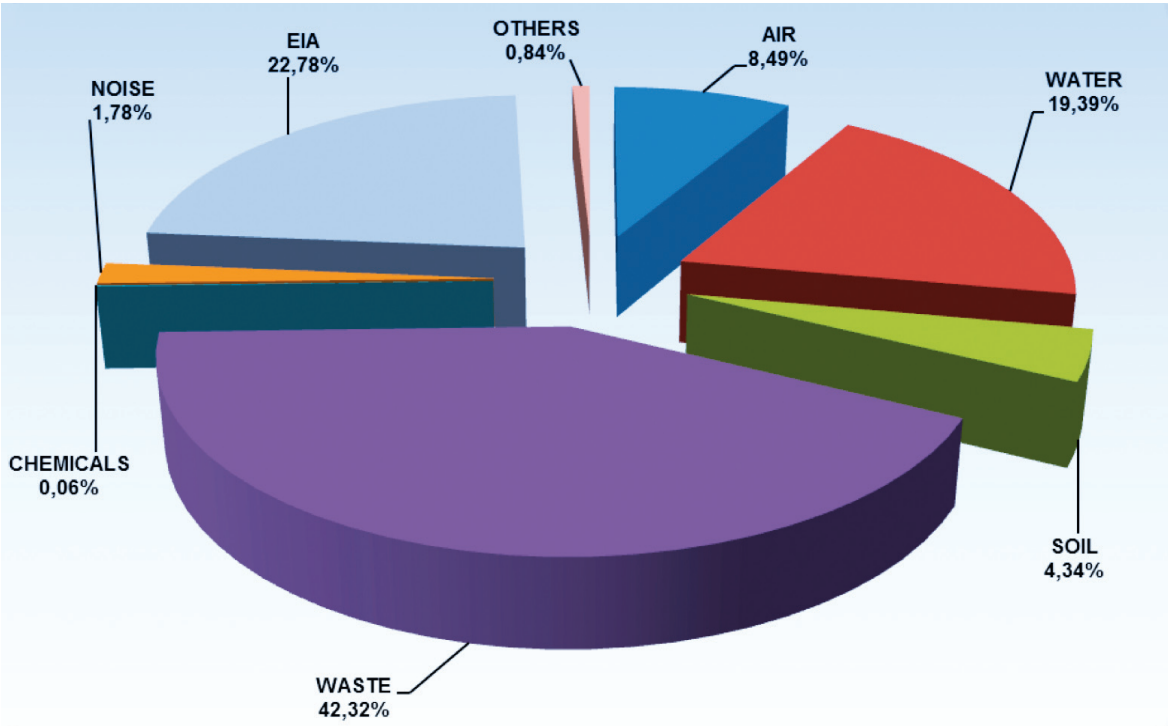


Figure 23 - The distribution of the total fines implemented by the Ministry

When Figure 23 which shows the distribution of the total administrative fines implemented by the central Ministry and PDEUs is analyzed, it is seen that the largest part of the amount of the fine is constituted by those implemented due to the non-compliances which were detected in the matter of waste management with the percentile of 42,32%. Waste management is followed by the administrative fines implemented due to the opposition to the By Law on EIA which is followed by the administrative fines implemented due to the water pollution violations. The administrative fines implemented due to the opposition to By Law on EIA correspond to the 22,78% of the total fines, the administrative fines implemented imposed for the non-compliances related to water pollution correspond to 19,39% of the total fines, and the fines imposed for the non-compliances related to air pollution correspond to 8,49 of the total fines.

Image 16 – Storage/Collection of the wastes separately in their sources.

Despite the fact that the number of the non-compliances detected in the matter of air pollution is 914 which is higher compared to the other non-compliances, only an administrative fine of ₺4,793,210 was implemented. On the other hand, despite the fact that the number of the non-compliance detected in the matter of waste management is 345 which is approximately the one third of those detected in the matter of air pollution, an administrative fine of ₺23,881,299 was implemented. The amount of the administration fine implemented in the matter of waste management is almost five times higher than that implemented in the matter of air pollution. This result reveals that the administration fines implemented in relation with the non-compliances committed in the matter of waste management are far higher.

Again, the amount of 636 administrative fines implemented due to the opposition to the By Law on EIA was ₺12,856,190

The administrative enforcements implemented in accordance with the Environmental Law after the amendment made in the Environment Law occurring in 2006 were carried out by repealed Ministry of Environment (repealed Ministry of Environment and Forests and Ministry of Environment and Urbanization) and by the institutions and organizations which got delegeting of the authority. The annual distribution of the amounts of the administrative fines implemented in accordance with the Environmental Law by the Ministry from this date is given in Table 16, Figure 24 and Figure 25.

Table 16 - The total amounts of the fines implemented by the Ministry in accordance with the Environmental Law by years (₺).

THE UNIT IMPLEMENTING THE FINE	2006	2007	2008	2009	2010	2011
CENTRAL MINISTRY	24.000	1.690.182	2.542.552	6.567.935	14.212.191	4.292.737
PDEU	12.191.700	32.794.910	34.362.370	36.142.451	49.338.910	52.136.032
TOTAL	12.215.700	34.485.292	36.904.922	42.710.386	63.551.101	56.428.769

The number of the environmental inspections has risen with the structure developing and the capacity increasing as a result of the increasing number of the personnel at the central and provincial organizations of the Ministry and of the in-service trainings provided for the Ministry personnel, and a significant increase in the amounts of the environmental fines implemented to the negativities detected occurred as a result thereof.

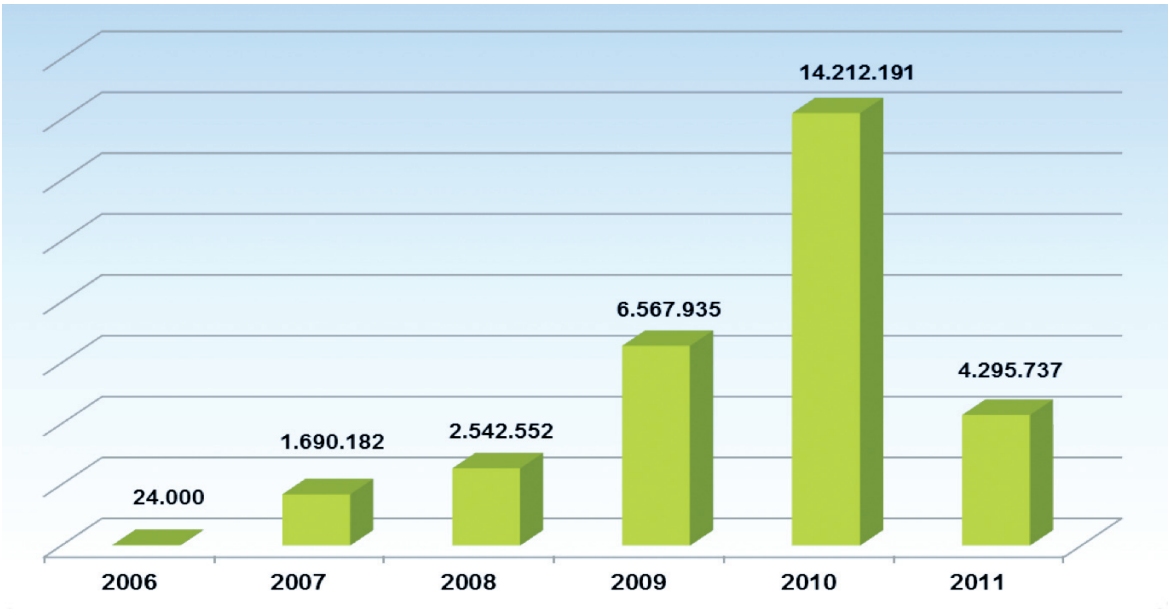


Figure 24 -The total amount of the fines implemented by the central organization of the Ministry in accordance with the Environmental Law by years. (₺)

Since 2006, when the authorization to implement the environmental fines in accordance with the Environmental Law numbered 2872 was granted to the Ministry and to the Provincial Directorates, the amount of the administrative fines implemented by both the central organization of the Ministry and by PDEUs has been increasing regularly. The same situation is valid for the number of the environmental inspections carried out by PDEUs. Despite the fact that there was an increase in the inspections carried out by PDEUs approximately by 12.58% in 2011 compared to 2010, the amount of the administrative fines which was implemented increased approximately by 5.67% compared to the previous year. Furthermore, a decrease was observed in the amount of the fines implemented by the central Ministry and the inspections which were carried out in 2011.

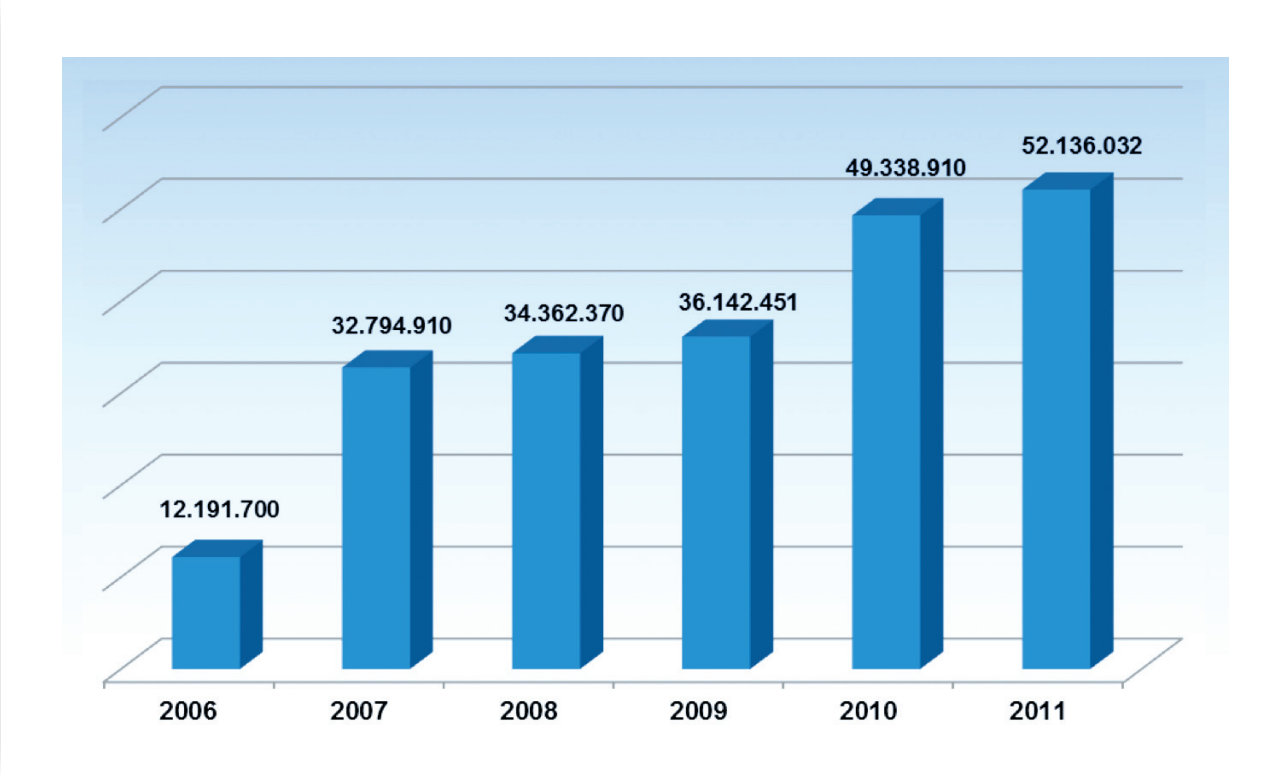


Figure 25 - The total amount of the fines implemented by the Provincial Directorates in accordance with the Environmental Law by years. (₺)

7.2. The Closure of Activity Under Environmental Law

The competent authorities have the authority to close the activities and/or facilities partly or wholly, temporarily or indefinitely, in accordance with article 15 of the Environmental Law numbered 2872 headed "The Closure of Activities". The activities endangering the environmental and human health are ceased by the competent authority without being given time.

The Closure of activities:

Article 15 – (Amended on 26/4/2006 – 5491/Article 12) Those who act incongruously against this Law and the regulations issued in accordance with this Law may be given a time the principles of which are determined by regulation ad which does not exceed one year for once only by the institutions and authorities to which the inspection authorization is delegeted by the Ministry or in accordance with the first paragraph of the article 12 to settle the said incongruous activity.

If the incongruousness is not settled immediately if no time is given, and at the end of the time if any time is given, the activity is ceased partly or wholly, temporarily or indefinitely by the institutions and authorities to which the inspection authorization is delegeted by the Ministry or in accordance with the first paragraph of the article 12. The activities endangering the environmental and human health are ceased without being given time.

The activities which are launched without carrying out any Environmental Impact

Assessment analysis is ceased by the Ministry without being given time, and the activities which are launched without preparing any introduction file is ceased by the highest administrative authority of the location without being given time.

Table 17 - The number of the decisions of closures made by the central Ministry and PDEUs in accordance with the Environmental Law in 2011

PDEUP	NUMBER OF CLOSURE
Central Ministry	16
Aksaray	2
Amasya	14
Antalya	6
Ardahan	1
Aydın	1
Bayburt	1
Bolu	2
Bursa	12
Çanakkale	8
Diyarbakır	3
Elazığ	1
Erzurum	12
Eskişehir	2
Gaziantep	1
Giresun	3
Hatay	1
İstanbul	16
İzmir	2
Kayseri	3
Kocaeli	3
Malatya	6
Mersin	10
Muğla	2
Osmaniye	2
Sakarya	3
Samsun	1
Sivas	11
Tekirdağ	5
Trabzon	1
TOTAL	**151**

When Table 17, which shows the number of the decision of closures made by the central Ministry and PDEUs to the facilities in accordance with the Environmental Law as a result of a total of 51,035 environmental inspections carried out in 2011 is analyzed, it is seen that the central organization of the Ministry made the decision of closure to 16 facilities, and the PDEUs made the decision of closure to 135 facilities, thus a total of 151 facilities received the decision of closure.

Image 17 - A waste storage area which is non-compliance to the legislation within the scope of the waste legislation.

In this framework, İstanbul PDEU made the decisions of closure of activity for 16 facilities in accordance with the Environmental Law in 2011. Istanbul PDEU made the decisions of closure of activity for 14 facilities, which is followed by Amasya PDEU the decisions of closure of activity for 12 facilities, which is followed by Bursa PDEU and Erzurum PDEU with the decisions of closure of activity for 11 facilities.

15 decisions of closure of activity implemented by the central organization of the Ministry in accordance with the Environmental Law within 2011 were made within the scope of the By Law on EIA.

8- DELEGETION OF THE INSPECTION AUTHORITY

Environmental Law brought together with Article 12 that the inspection authority will be delegeted by the Ministry when needed to;

- The special provincial administrations,
- The municipalities with established environmental inspection units,
- Undersecretaries of Maritime Affairs,
- Coast Guard Command,
- The person commissioned with control and inspection in accordance with 13/10/1983 dated and 2918 numbered Land Routes Traffic Act.

The fact that the public institution taking over the authority to inspect will take over the authority to make administrative enforcement decision comes into question. According to Article 24 of the Environmental Law, the authority to make administrative enforcement decisions anticipated in this Law belongs to the Ministry of Environment and Urbanization, and this authority shall be used by the institutions and authorities specified above, to which the authority to inspection is delegeted in accordance with the first paragraph of article 12.

The specifications to be sought at the municipalities to get delegeting of authority in the matter of **Noise** by means of the Circular of Delegeting of The Authority numbered 2006/16 issued on July 29, 2006 were determined by the Ministry in this scope. In accordance with this circular, a total of 93 municipalities, 10 of which being metropolitan municipality, 15 of which being provincial municipalities, and 68 of which being district municipalities were authorized to apply inspection and enforcement by the Ministry in this scope. In addition, Coast Guard Commands and the Traffic teams throughout Turkey were authorized to apply inspection and enforcement by the Ministry in this scope.

The specifications to be sought at the institutions and organizations which will get delegeting of the authority in the matter of **Inspection of the Pollution Originated from Ships and Applying Enforcement** by means of the Circular of Delegetion of Authority numbered 2006/13 issued on July 21, 2006 were determined. In accordance with this circular, Undersecretary of Maritime Affairs, Coast Guard Command and Istanbul, Kocaeli, Antalya, and Mersin Metropolitan Municipalities were authorized to carry out inspection and enforcement until the end of 2011. The delegetion of authority given to Undersecretary of Maritime Affairs was delegeted to the Ministry of Transport, Maritime Affairs, and Communications founded by "Decree Law on the Organization and Duties of the Ministry of Transport, Maritime Affairs, and Communications" numbered 655, coming into force upon being issued in the Official Gazette dated November 1, 2011 and numbered Repeated 28102.

The specifications to be sought at the institutions and organizations which will get delegeting of authority in the matter of **Inspection of Solid Fuels (e.g. coal) and Applying Enforcement** by means of the Circular of Delegeting of Authority numbered 2006/19 issued on July 29, 2006 were determined. In accordance with this circular, 163 municipalities are authorized to carry out inspection and enforcement

until the end of 2011. 11 of these municipalities are metropolitan municipalities, 27 of them are provincial municipalities, and the remaining 125 of them are district municipalities.

The specifications to be sought at the institutions and organizations which will get delegeting of authority in the matter of **Excavation Wastes** by means of the Circular of Delegeting of Authority numbered 2008/6 issued on May 20, 2008 were determined. In accordance with this circular, Metropolitan Municipalities are authorized to carry out inspection and enforcement in the matter of excavation wastes until the end of 2011.

57 municipalities were authorized to carry out inspection and enforcement in the matter of **Waste Edible Oils** until the end of 2011 beginning from the August, 2007 in accordance with Article 12 of the Environmental Law. In accordance with this circular, a total of 80 municipalities, 8 of which being metropolitan municipality, 20 of which being provincial municipalities, and 52 of which being district municipalities were authorized to apply inspection and enforcement in the matter of waste edible oil until the end of 2011. In addition, South Antalya Tourism Development and Infrastructure Operations Union (GATAB) was authorized to carry out inspection and enforcement in the matter of waste edible oil.

The information on the administrative fines implemented by the institutions which got delegeting of the authority by the Ministry in the matter of Inspection for the Pollution Originated from the Ships and Applying Enforcement between 2006 and 2009 is included in Table 18.

Table 18 - The amount of the fine implemented by the institutions which got delegeting of the authority in the matter of Inspection for the Pollution Originated from the Ships and Applying Enforcement by years (₺)

THE INSTITUTION TO WHICH FINE WAS IMPLEMENTED	2006	2007	2008	2009	2010	2011
Coast Guard Command	71.143	261.007	144.822	456.882	727.364,00	448.660,00
Undersecretary of Maritime Affairs	166.539	650.028	663.749	647.000	78.967,11	217.671,01
Istanbul Metropolitan Municipality	2.472.437	9.763.834	14.258.350	5.276.051	4.963.780,00	3.124.818,00
Kocaeli Metropolitan Municipality	1.479.651	2.067.043	1.983.635	940.037	822.581,00	1.156.983,00
Antalya Metropolitan Municipality	18.490	25.468	242.295	560.187	191.443,05	309.012,79
Mersin Metropolitan Municipality	0	31.055	48.478	0	0,00	413.745,00
TOTAL	**4.208.260**	**12.798.435**	**17.341.329**	**7.880.157**	**6.784.135,16**	**5.670.889,80**

9- PARTICIPATION IN THE WORKS OF INTERNATIONAL NETWORKS OF INSPECTORS, PROJECTS AND TRAINING ACTIVITIESY

9.1. Participation in the Works of IMPEL Network

Our Ministry participated in the 7th IMPEL (IMPEL Network - European Network for the Implementation and Enforcement of Environmental Law) General Meeting held in Budapest, the Capital of Hungary who is the Term President of EU between May 23rd and 25th, 2011.

An election was held at the meeting since the 2-year term of office of the Management ended, and Zofia TUCINSKA was elected as the Directorate General. IMPEL Secretariat performed a presentation on the study carried out and on the budget. In addition, information on the competed and continuing projects was presented. The preparation studies for the 4th IMPEL Conference to be held in Malta in 2012 were expressed.

Apart from this activity, none of the other IMPEL projects and meetings were attended due to the reorganization process of the Ministry.

9.2. Participation in the Works of RENA Network

Regional Environmental Network for Accession (RENA) which was established in 2010 includes Albania, Bosnia-Herzegovina, Macedonia, Serbia, Croatia, Montenegro, and Kosovo along with Turkey. 4 study groups are defined under the RENA Network;

① *Strategic Planning and Investments*

② *Climate Change*

③ *Cross-border Cooperation and Multilateral Agreements*

④ *Environmental Compliance and Enforcement Network for Accession (ECENA)*

The objective of the ECENA Study Group is to internalize the EU environmental legislation, to increase the effectiveness of the implementation and enforcement studies, to enhance the efficiency of inspection units, and to share the knowledge and experiences. It is planned to carry out the activities of the said Study Group under 3 clustures;

Clusture 1: ***Trainings***

Clusture 2: ***Institutional and methodological developments***

Clusture 3: ***Cross-border implementations***

The activities carried out in Turkey within the scope of the said Study Group are given in Table 19;

Training on the Integrated Pollution Prevention and Control Directive (IPPC) for the inspectors and permit writters in Turkey between October 4th and 7th, 2011 was held.

Table 19 - The RENA Network activities carried out in Turkey in 2011

Integrated Pollution Prevention and Control (IPPC) Directive Training for Inspectors and Permit Writters	İzmir	4-7 September, 2011
Assessment Report Study for Turkey	Ankara	6-8 December, 2011

Image 18 - Integrated Pollution Prevention and Control (IPPC) Directive Training for Inspectors and Permit Writers in İzmir, Turkiye.

Besides the permit writters and inspectors at the central and provincial organizations of our Ministry, the personnel in charge of harmonizing the specified directive also participated in the training. Inspectors from Macedonia and Montenegro also participated in the training and provided information on the implementations in their own countries. The site visiting was carried out at an establishment which manufactures steel by means of electric arc furnace during the training carried out in İzmir.

The Experts of RENA arrived at Ankara in order to collect information to create the Country Assessment Report between December 6th and 8th, 2011. The harmonization status of the Environmental Legislation of EU and the permiting and inspection systems were reviewed within the scope of the said study. Besides central organization of our Ministry, in order to receive information on the application at the Provincial Directorates, to reflect the point of view of the representatives of the Provincial Directorate of Ankara and the industrialists, meetings were held with the industry representatives.

Image - 19 Integrated Pollution Prevention and Control (IPPC) Directive Training for Inspectors and Permit Writers, Site Visiting in İzmir - Türkiye.

9.3. Project on the Planning of Environmental Inspections (G2G10/TR/9/1)

It is specified that the environmental inspections to be carried out under the Recommendation of the European Parliament and of the Council on providing for minimum criteria for environmental inspections in the Member States numbered 2001/331/EC and dated 4 April 2001, issued by European Parliament and European Council in 2001 should be planned in advance. The inspection plan should be created considering the facilities dependent on the inspection and the risks and the environmental impacts of the emission and discharges originated from these facilities. It is necessary to prepare programs for the routine inspections by basing on the environmental risks of the facilities. In addition, the plan should include information on the way to be followed in case of detecting any complaint, accident, or non-compliance and on non-routine inspections.

In the course of the intercourse and interviews performed with the authorities of Ministry of Infrastructure and the Environment of Netherlands during the IMPEL meetings in the scope of the studies performed pursuant to IMPEL since 2008, the deficiencies of Turkey in planning the environmental inspections and the joint studies that would be carried out were discussed. Within the scope of the cooperation achieved with Netherlands since April 2010, the idea exchanges carried out previously within the scope of the G2G.NL-Environmental Program were transformed into a text which was then submitted to the Netherlands government via Secretariat General for EU and the project was approved by the Netherlands government, then its implementation was started at the Opening Meeting held in 24 March 2011. The information on the project which was started to be implemented is given below.

Name of the Project	*Project on the Planning of Environmental Inspections (G2G10/TR/9/1)*
Duration of the Project	*18 months (March 2011 – October 2012)*
Cost of the Project	*130,000 Euro (Grant)*
Status of the Project	*Joint Project within the scope of Government to Government Cooperation (Turkey – the Netherlands)*

Turkey has many deficiencies in planning the environmental inspections in the current situation. These deficiencies both affect the implementation of the environmental inspections directly, and cause the work force exerted and the works to be done on the basis of inspection unit to occur in an unplanned way. It is aimed to develop a method in order to plan the project and the environmental inspections carried out by the central and provincial organizations of the Ministry. In as much as, planning of the environmental inspections are carried out in order to implement the activities of

- Determining the priorities,
  - Risk assessment (on the basis of establishments to be inspected),
  - Classification and determining the facilities to be inspected,
- Determining the aims and objectives of the inspection,
- Assessing the administrative, finance, and personnel resource statuses,
- Creating the inspection plan and program

and in order to develop the environmental inspections in this scope to perform objectives and strategies created by the Ministry or by the Units Authorized to Inspection within the scope of the environmental politics. However, in the current situation, an inspection program is scheduled instead of making an inspection plan, the data on the facilities or activities dependent on the inspection are not analyzed before the inspection program, the inspection indicators other than pollution are not taken into account, and the concepts like inspection frequency are not considered. This situation prevents the inspections from being carried out in a more efficient and systematic way.

Therefore, the said project will allow the methodology on planning the environmental inspections and creating the risk assessment system which is necessary and one of the most important tools for planning in Turkey to be developed.

With reference to the project proposal sent as of April 2010, the project was started in March 2011 as a result of the interviews performed with the authorities from Netherlands, and it is aimed that it will last 18 months. However, the project operations were suspended for a certain time during the reorganization of the Ministries, and then the working calendar was updated in line with the new raising situation.

Project working group will prepare an inspection plan for a pilot province by means of the method which will be developed, and will test the applicableness of the method. It has been decided as a result of the assessment made in this scope that the pilot implementation will be carried out with Samsun Provincial Directorate of Environment and Urbanisation. The project team of our Ministry and the representatives of Samsun Provincial Directorate of Environment and Urbanisation were informed by the Project Experts from Netherlands with the risk assessment methods being used in the member states of the EU on 15-16 July 2011.

A working meeting was held on the risk criteria to be used for the risk assessment system between the project team of the Ministry and the personnel of Samsun Provincial Directorate of Environment and Urbanisation, which is selected as the pilot province on 19-20 December 2011

9.4. Training Activities

In accordance with article 35 of the By Law on Environmental Inspection, it is necessary to receive Environmental Inspection Training to be able to become an Environmental Inspector. In this scope, the personnel serving at the central and provincial organizations of our Ministry since 2006 are provided with the said trainings.

In 2006, it was decided that the combined inspections conducted by the central organization of the Ministry within the scope of the By Law on Environmental Inspection would be spread to the provincial directories, and the trainings were provided at 5 provincial directories including Adana, Ankara, Bursa, İzmir, and Tekirdağ. Later, the other provincial directories were also provided with the Environmental Inspections Trainings within the scope of a certain plan. The distribution of the Provincial Directories included in the said trainings is given in Table 20 by years. The last Provincial Directorate to have been included in the training scope in 2011 is Istanbul.

Table 20 - The number of the provincial directorates being included in the training program by years

YEARS	THE NUMBER OF THE PROVINCIAL DIRECTORATES ATTENDING THE TRAINING
2006	5
2007	11
2008	24
2009	24
2010	16
2011	1
TOTAL	81

Within the year of 2011, the personnel of the Provincial Directorate of Istanbul were provided with the Environmental Inspections Training as 2 groups on 7-8 March 2011 and 9-10 March 2011. The subjects included within the content of the 2-days training provided for the Provincial Directorate of Istanbul are listed below;

- By Law on Environmental Inspection
- By Law on the Environmental Employee and Environmental Consultancy Companies
- The minimum criteria for the Environmental Inspections
- Site visits, planning, inspections frequency, reporting
- Communications techniques for the environmental inspectors

9.5. Inspection Information System

It is very important to increase the information on the environmental conditions of the member states of the European Union in supporting the reinforcement of environmental protection in Europe. For this purpose, the member states collect the environmental data over a large area and report this data to the European Commission, European Environment Agency, and EUROSTAT.

Turkey has taken important steps for the compliance to the European Union Environmental Acquis within the framework of membership to the European Union. Turkey is already a member of European Environment Agency and OECD (Organization for Economic Cooperation and Development). Today, in Turkey, the competent authorities collect the environmental data and share most of this data with the international institutions.

Operations related to the Project of Establishing Turkish Environmental Information Exchange Network (TEIEN) started by the repealed Municipality of Environment and Forests of Republic of Turkey are sustained by our Ministry. Inspection and monitoring modules were updated according to the needs of todays within 2011, and data entries by our central and provincial organization were started.

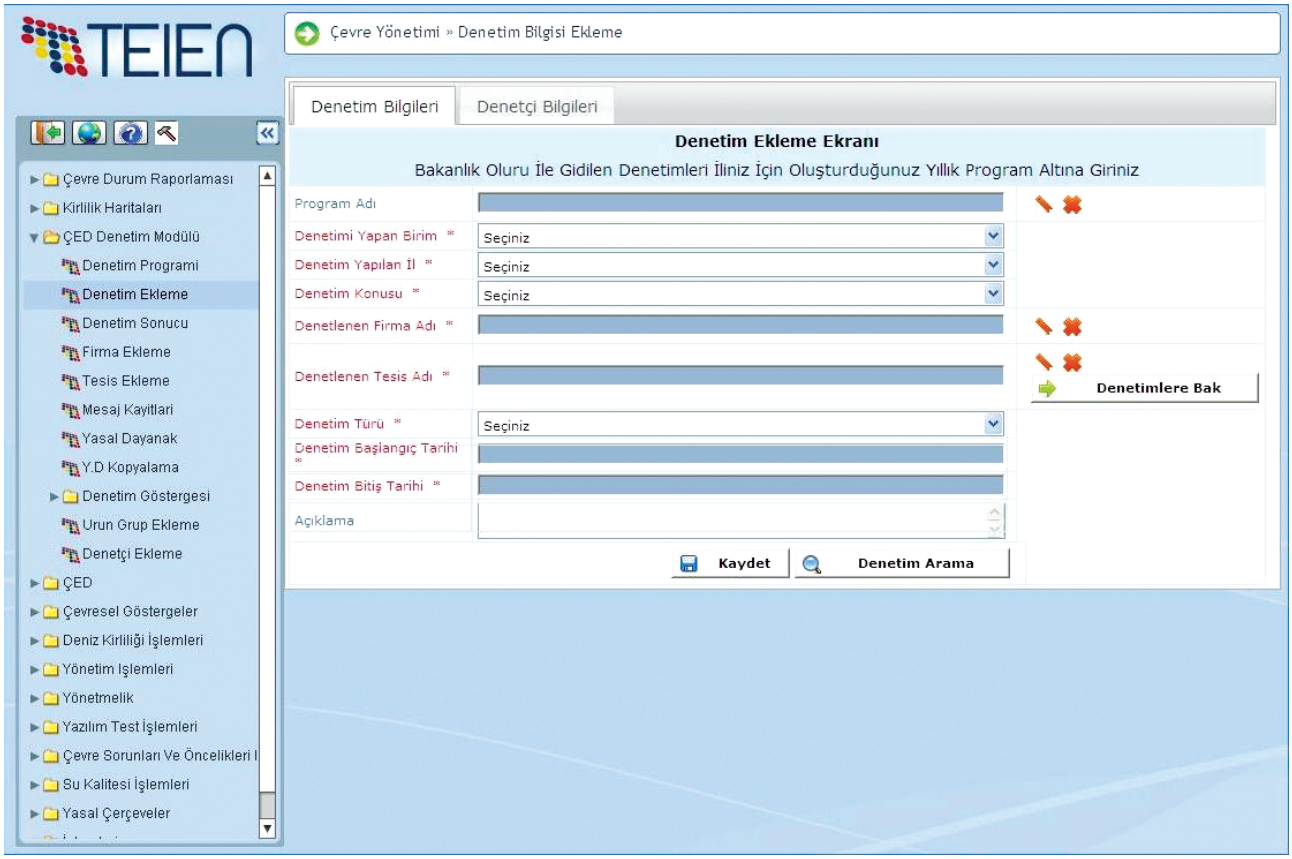


Image 20 – "Inspection Addition Screen" in Inspection Module.
The inspections to be conducted or to have been conducted are entered into the system via the said screen.

The Inspection is assessed under the headings of;

- Combined,
- Waste Management,
- Wastewater Management,
- Soil Management,
- Air Management,
- Noise Management,
- Chemicals Management,

- Natura Conservation,
- Market Survaliance and Inspection,
- Follow up Inspection,
- Seveso Inspection,
- EIA Inspection

in the modules.

It is possible to perform the following queries and take reports like;

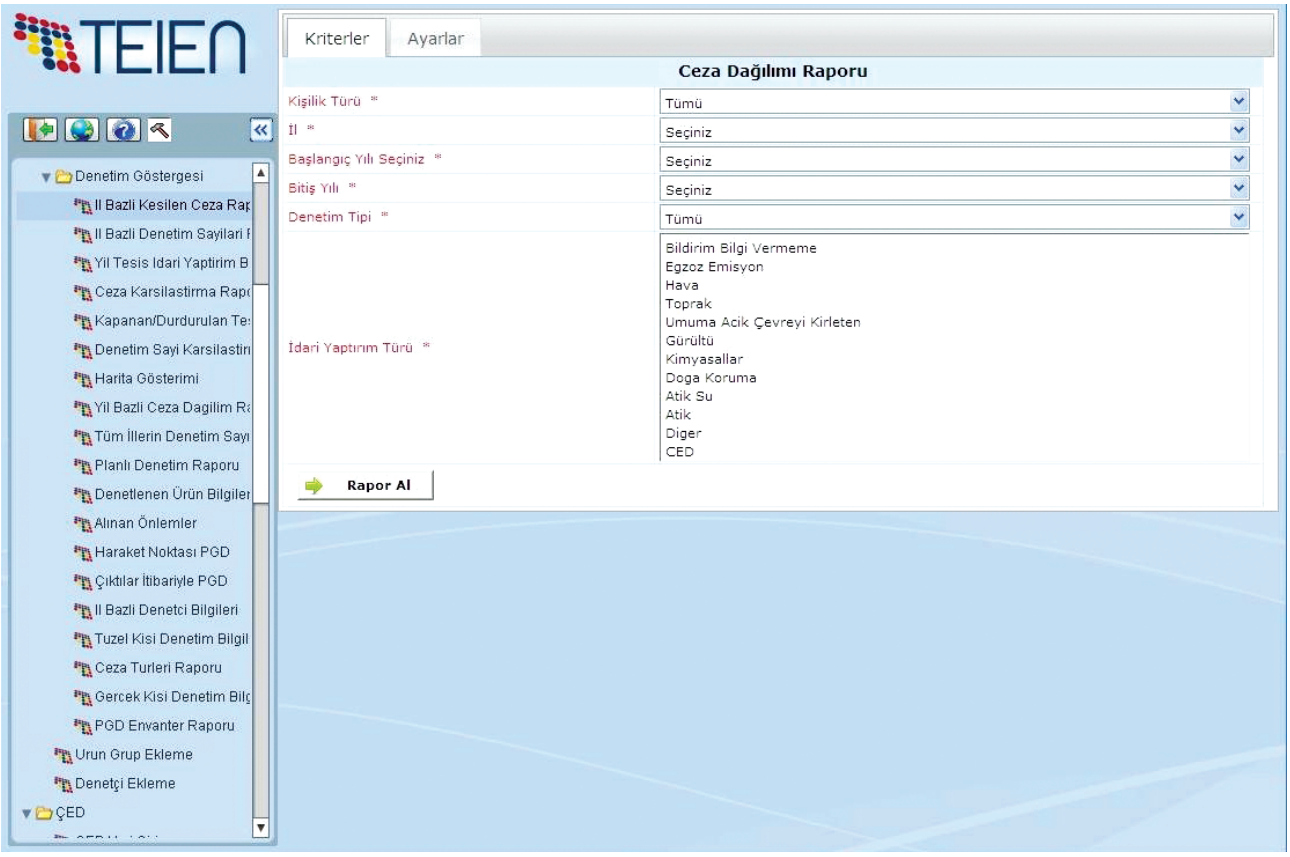


Image 21 –. "Fine Distribution Report Screen" in Inspection Module. It is possible to perform queries on how the fines implemented for the central or provincial organization of the Ministry is distributed according to their types, and what is the change of them by years via the said screen.

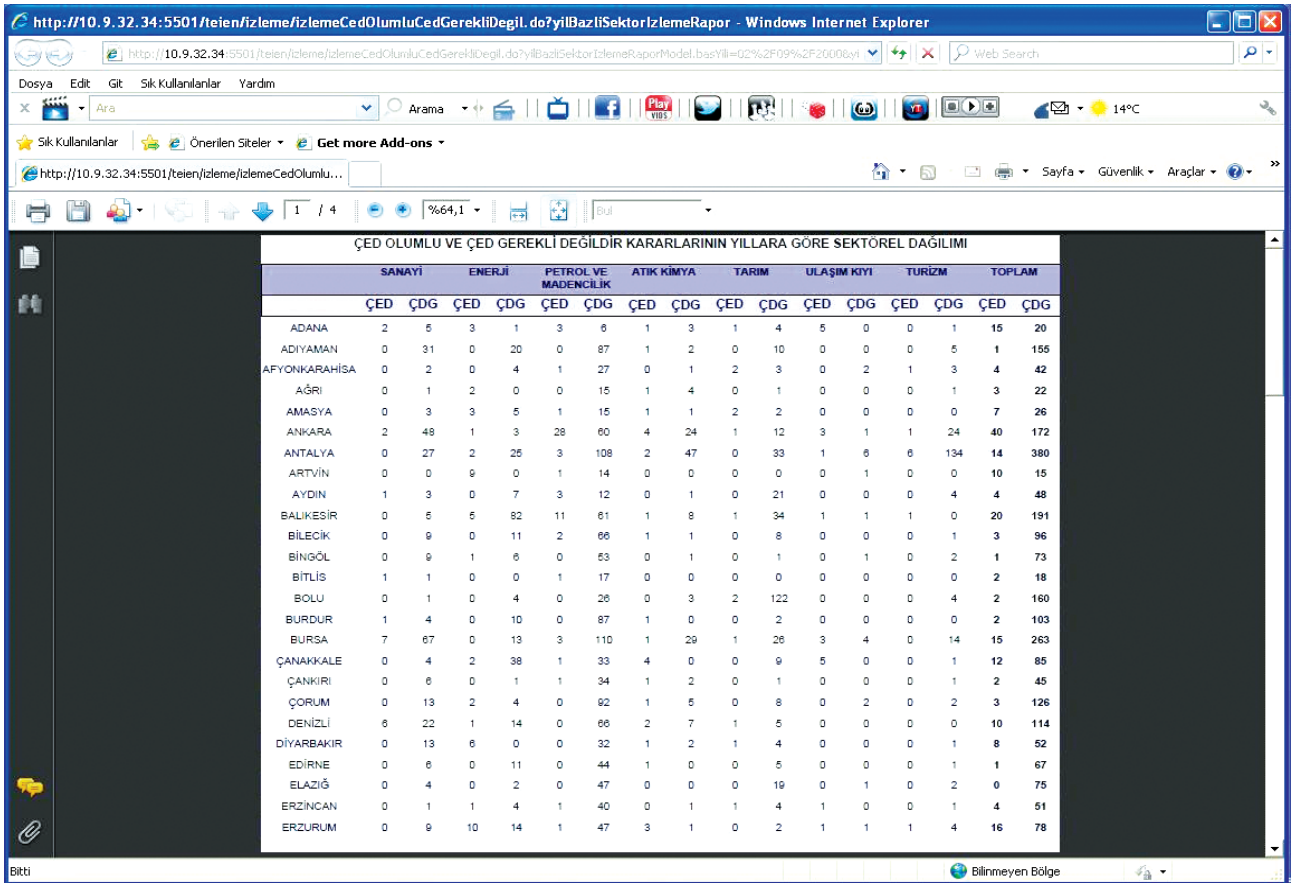
a) in the inspection module of the software created within the scope of the project;

- Inspection program,
- Inspection addition,
- Inspection result,
- Company addition,
- The legal basis of the penalty,
- Product group addition,
- Inspector addition

b) in the inspections indications module,

- The reports of the fines imposed province-based,
- The reports of the province-based inspection numbers,

- Year-facility-administrative enforcement-based fines,
- Fine comparison reports,
- Closed facility report,
- Inspection numbers comparisons,
- Map display
- Year-based fine distribution reports
- All provinces inspection numbers,
- Routine inspection reports,
- Inspected product information,
- Measures taken,
- Starting point MSI,
- By printouts MSI,
- MSI inventory report,
- Province-based inspector information,
- Fine types report,



ÇED OLUMLU VE ÇED GEREKLİ DEĞİLDİR KARARLARININ YILLARA GÖRE SEKTÖREL DAĞILIMI

	SANAYİ		ENERJİ		PETROL VE MADENCİLİK		ATIK KİMYA		TARIM		ULAŞIM KIYI		TURİZM		TOPLAM	
	ÇED	ÇDG	ÇED	ÇDG	ÇED	ÇDG	ÇED	ÇDG	ÇED	ÇDG	ÇED	ÇDG	ÇED	ÇDG	ÇED	ÇDG
ADANA	2	5	3	1	3	6	1	3	1	4	5	0	0	1	15	20
ADIYAMAN	0	31	0	20	0	87	1	2	0	10	0	0	0	5	1	155
AFYONKARAHİSA	0	2	0	4	1	27	0	1	2	3	0	2	1	3	4	42
AĞRI	0	1	2	0	0	15	1	4	0	1	0	0	0	1	3	22
AMASYA	0	3	3	5	1	15	1	1	2	2	0	0	0	0	7	26
ANKARA	2	48	1	3	28	60	4	24	1	12	3	1	1	24	40	172
ANTALYA	0	27	2	25	3	108	2	47	0	33	1	6	6	134	14	380
ARTVİN	0	0	9	0	1	14	0	0	0	0	0	1	0	0	10	15
AYDIN	1	3	0	7	3	12	0	1	0	21	0	0	0	4	4	48
BALIKESİR	0	5	5	82	11	61	1	8	1	34	1	1	1	0	20	191
BİLECİK	0	9	0	11	2	66	1	1	0	8	0	0	0	1	3	96
BİNGÖL	0	9	1	6	0	53	0	1	0	1	0	1	0	2	1	73
BİTLİS	1	1	0	0	1	17	0	0	0	0	0	0	0	0	2	18
BOLU	0	1	0	4	0	26	0	3	2	122	0	0	0	4	2	160
BURDUR	1	4	0	10	0	87	1	0	0	2	0	0	0	0	2	103
BURSA	7	67	0	13	3	110	1	29	1	26	3	4	0	14	15	263
ÇANAKKALE	0	4	2	38	1	33	4	0	0	9	5	0	0	1	12	85
ÇANKIRI	0	6	0	1	1	34	1	2	0	1	0	0	0	1	2	45
ÇORUM	0	13	2	4	0	92	1	5	0	8	0	2	0	2	3	126
DENİZLİ	6	22	1	14	0	66	2	7	1	5	0	0	0	0	10	114
DİYARBAKIR	0	13	6	0	0	32	1	2	1	4	0	0	0	1	8	52
EDİRNE	0	6	0	11	0	44	1	0	0	5	0	0	0	1	1	67
ELAZIĞ	0	4	0	2	0	47	0	0	0	19	0	1	0	2	0	75
ERZİNCAN	0	1	1	4	1	40	0	1	1	4	1	0	0	1	4	51
ERZURUM	0	9	10	14	1	47	3	1	0	2	1	1	1	4	16	78

Image 22 – "Distribution of EIA Positive and EIA Not Required Decisions Screen" in Inspection Module.

c) in the EIA Monitoring Module

- Monitoring control results,
- Annual monitoring plans,
- Monitoring query,
- General complaint

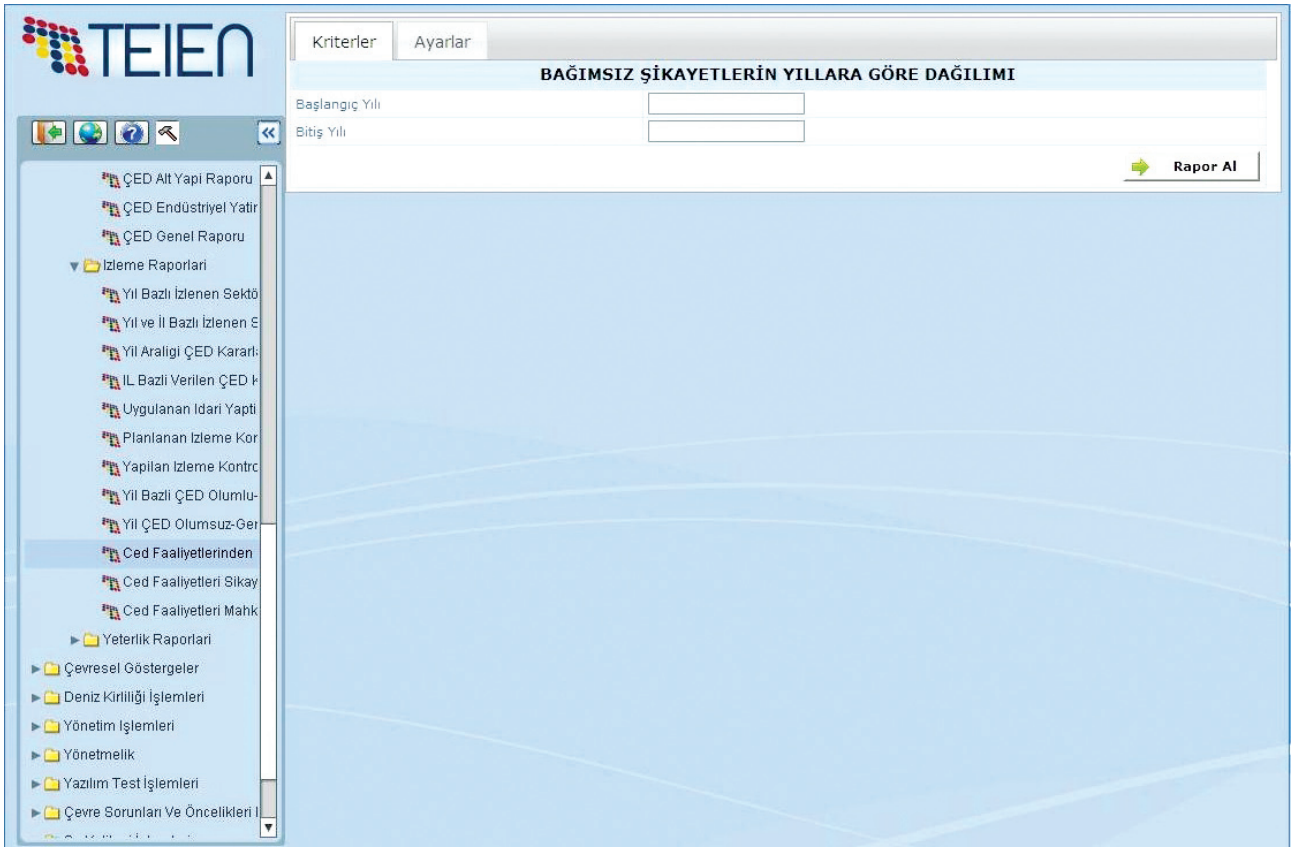


Image 23 – "Screen Displaying the Distribution of Complaints" in Inspection Module.

d) Monitoring Reports

- Sectors monitored year-based,
- Sectors monitored year and province-based,
- Year interval EIA decisions,
- EIA decisions made province-based,
- Administrative enforcements applied,
- Planned monitoring operations,
- Performed monitoring control operations,
- Year-based EIA Positive-Not Required Decisions,
- Year-based EIA Negative- Required Decisions,
- EIA Activities complaints,
- Complaints independent from EIA Activities,
- EIA activities courts.

It is aimed to integrate and develop the two modules in the 2012-2013 periods.

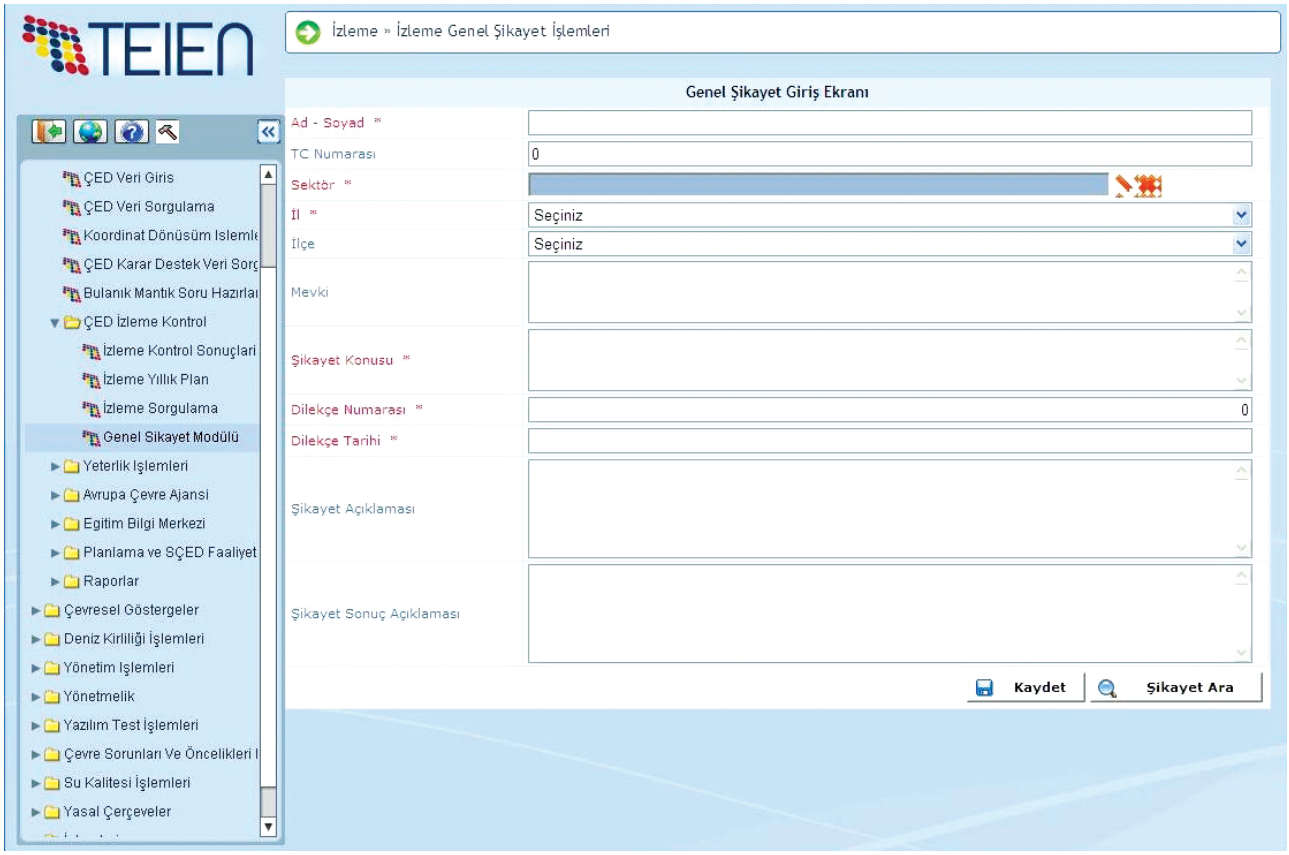


Image 24 – "General Complaints Entry Screen" in the Inspection Module. The complaints from the central or provincial organization of the Ministry may be entered and it can be seen whether the complaint has been resulted in an inspection or not, if it has, how it has been, via the said screen.

10- CONCLUSIONS

Data regarding inspections performed within 2011 by DGEIAPI are given in Table 21 and in the graphics taking place in Figure 26 and Figure 27. While 729 environmental inspections were carried out by central organization of the Ministry within 2011, 644 of these inspections were the environmental inspections within the scope of monitoring-control works of By Law on EIA. On the other hand, 50,313 environmental inspections were carried out in total by PDEU's in 2011.

Table 21 – Number of inspections performed within 2011 by DGEIAPI

COMBINED	WATER	EIA	TOTAL
65	20	644	729

When the Figure 26 and Figure 27 are examined, it can be seen that a highly great part of the inspections performed by GDEIAPI within 2011 were the inspections performed within the framework of EIA monitoring and control activities with a percentage of 88.34%.

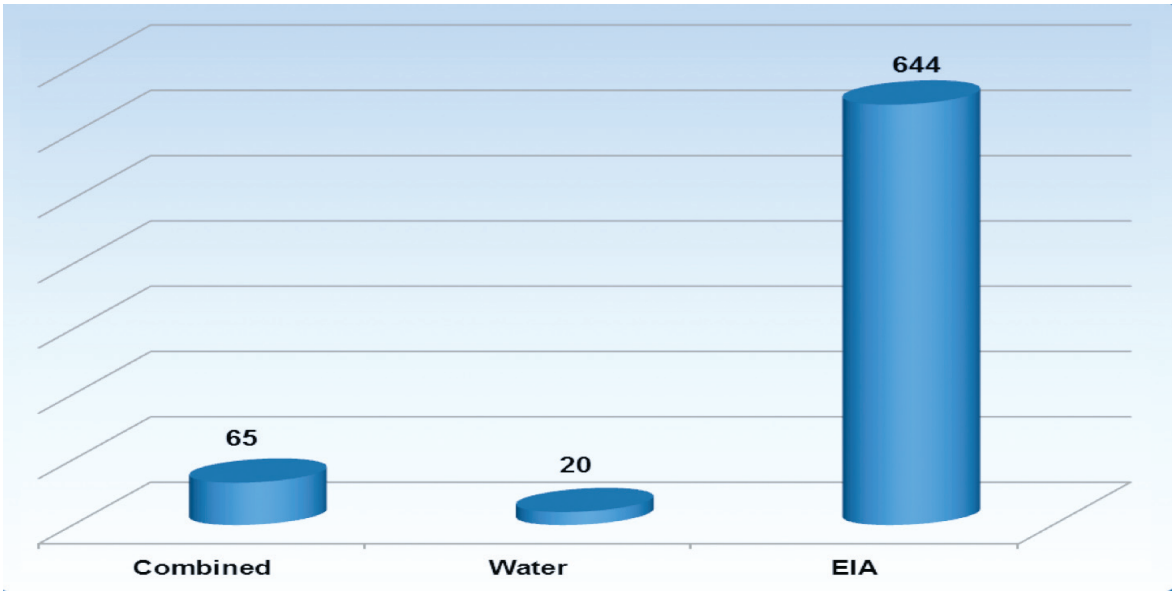


Figure 26 – Number of inspections carried out by DGEIAPI within 2011

Inspections were carried out for 644 activities or facilities within the scope of By Law on EIA by central organization of the Ministry within the framework of EIA monitoring and control activities. The other great part in environmental inspections carried out by GDEIAPI is integrated inspections performed within the framework of annual plan with a share of 8.92%.

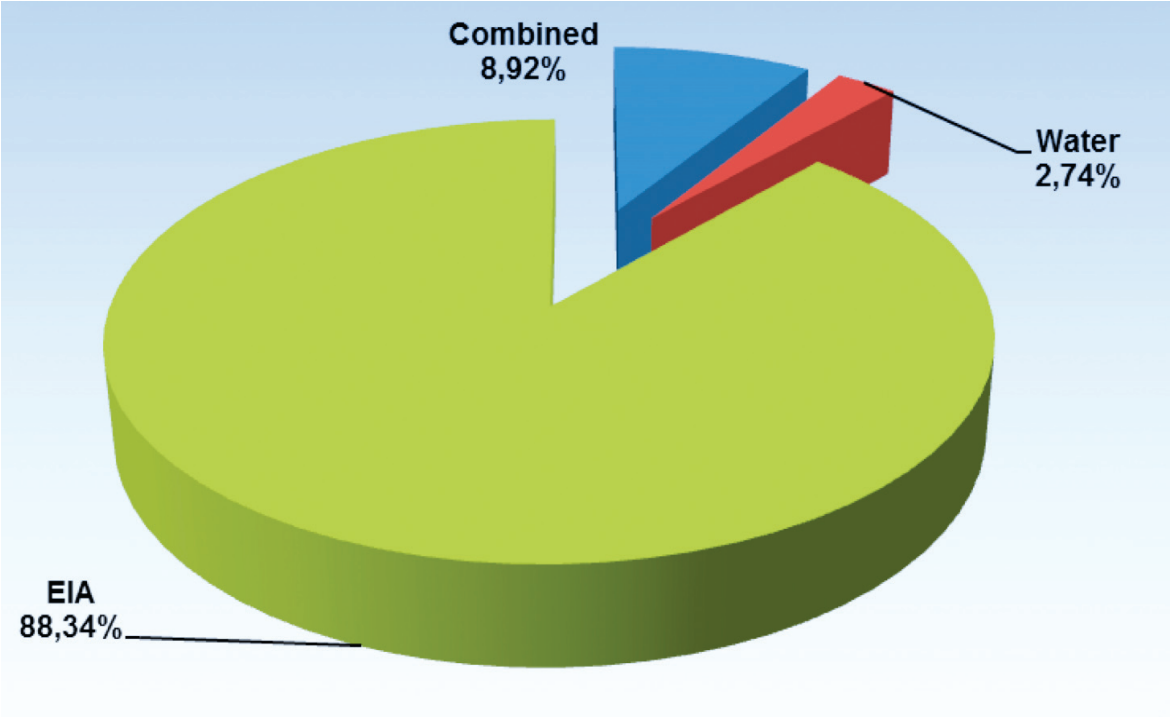


Figure 27 – Percentage distribution of inspections carried out by DGEIAPI in 2011

Picture 25 –Construction of A Landfill Area

Picture 26 – Waste Water Treatment Plant

In this context, when Table 22 which shows distribution of environmental inspections carried out by the whole Ministry (both central organization and its PDEU's) is examined, it is seen that only 33.31% of the environmental inspections are routine inspections and it is found out that a great part of the inspections carried out by the Ministry are non-routine inspections.

Table 22 – Environmental inspections carried out by the Ministry and distribution of these inspections.

	PDEU	DGEIAPI	TOTAL	%
Routine Inspections	**16.297**	**704**	**17.001**	**33,31**
Non-routine Inspections	**34.016**	**25**	**34.041**	**66,69**
TOTAL	**50.313**	**729**	**51.042**	**100,00**

It was observed that total number of complaints reaching to the Ministry within 2011 is 8,829, 83.31% of these complaints were concluded with inspections by the Ministry and the remaining complaints were conveyed to the related organizations and institutions depending on the content of complaints.

Data regarding administrative fines applied by the Ministry in 2011 for non-compliance with Environmental Law are given in Table 23 and total amount of fine is ₺56,428769

Table 23 – Administrative fines applied by the Ministry of Environment and Urbanisation in 2011 (₺)

APPLYING UNIT	AMOUNT OF FINE (₺)
DGEIAPI	4.292.737
PDEU	52.136.032
TOTAL	**56.428.769**

As a result of assessment of the data which is present within the content of this report, suggestions regarding performance of a successful environmental management by developing inspection system are given below;

◆ ***Increasing percentage of routine (planned) inspections***

It was found that percentage of outine inspections carried out by the Ministry within 2011 was 32.39%; in this context, number/percentage of routine inspections carried out by provincial directorates should have been much higher. Because, the Ministry should carry out its inspections in line with its own goals in order to perform a successful environmental management and it isachieved through routine inspections. It is pretty important to program and carry out environmental inspections within the scope of a program for a period of time (for example, 1 year). Therefore, the Ministry will enable development of environment in line with its strategies and goals. In this context, it is highly significant to disseminate the outputs

acquired from "Project of Planning Inspections" to provincial directorates, as well.

◆ *Disseminating of combined inspections*

It should be given importance to combined environmental inspections; the efficiency taken from inspection increases due to the fact that all environmental factors are examined simultaneously within the framework of regulations during environmental inspection. Thus, it would be suitable for each provincial directorate to prepare annual inspection programs which are convenient with their own personnel resources and to realize combined inspections as specified in the program.

◆ *Establishment of national inspector network*

It has been a positive step to establish environmental inspection sections in Provincial Directorates for improving efficiency of environmental inspection transactions. It is pretty important to carry out similar inspection procedure and enforcement throughout the country.Therefore, it would be beneficial to form a network which will enable information exchange and share of experiences among central organization of the Ministry and local inspectors and which will focus on the arising problems.

◆ *Continuity of active participation in international inspector networks*

It is pretty important to enable continuity of participation in IMPEL and ECENA activities, to take active roles in the projects carried out by these networks and even to form and apply project(s) within these networks. Moreover, participation in the network meetings of INECE which gathers inspectors from all over the world will enable to acquire information about the applications in all over the world.

◆ *Determination of training need*

Local inspectors working in central organization of the Ministry have been trained within the scope of the Project of Capacity Enhancement in the Application and Enforcement of Environmental Law through IMPEL and ECENA. Now, these local inspectors can give trainings about Minimum Criteria for Environmental Inspections. In the following periods, these trainings should be given by the local inspectors and different trainings should be received within the scope of the projects. Within this context, the following training topics are suggested;

- ✓ *Integrated Pollution Prevention and Control Directive and Best Available Techniques*
- ✓ *Clean production technologies*
- ✓ *Compliance promotion*
- ✓ *Communication and negotiation techniques*

◆ *Development of Inspection Information System*

Inspection Information System which has started to be used by the central and provincial organization of the Ministry should be developed with upcoming projects. It would be useful to carry out all phases of inspection and enforcement activities (preparing and reporting administrative enforcement minutes) with the amendments to be made.

ANNEXES

Annex - 1. Provincial Distribution of the number of PACs and Environmental Permit/Licenses in 2011

ITEM NO	PROVINCES	PAC ANNEX 1	PAC ANNEX 2	PAC (ANNEX-1+ ANNEX-2)	Env. Per./Lic. (ANNEX-1)	Env. Per./Lic. (ANNEX-2)	Env. Per./Lic. (ANNEX-1+ ANNEX-2)
1	ADANA	10	26	36	1	8	9
2	ADIYAMAN	1	1	2	0	0	0
3	AFYONKARAHİSAR	1	11	12	0	8	8
4	AĞRI	1	0	1	0	0	0
5	AMASYA	0	14	14	0	4	4
6	ANKARA	47	81	128	12	19	31
7	ANTALYA	7	113	120	3	48	51
8	ARTVİN	1	7	8	0	2	2
9	AYDIN	7	59	66	1	10	11
10	BALIKESİR	3	26	29	2	19	21
11	BİLECİK	5	15	20	1	5	6
12	BİNGÖL	1	5	6	0	3	3
13	BİTLİS	0	0	0	0	0	0
14	BOLU	0	27	27	1	14	15
15	BURDUR	1	11	12	0	3	3
16	BURSA	33	140	173	13	60	73
17	ÇANAKKALE	7	23	30	1	10	11
18	ÇANKIRI	0	4	4	0	3	3
19	ÇORUM	2	5	7	0	2	2
20	DENİZLİ	1	23	24	5	11	16
21	DİYARBAKIR	1	12	13	0	1	1
22	EDİRNE	1	16	17	0	9	9
23	ELAZIĞ	0	10	10	0	5	5
24	ERZİNCAN	3	10	13	0	4	4
25	ERZURUM	3	2	5	1	0	1
26	ESKİŞEHİR	10	17	27	1	5	6
27	GAZİANTEP	16	39	55	2	22	24
28	GİRESUN	0	9	9	0	5	5
29	GÜMÜŞHANE	0	5	5	0	0	0
30	HAKKARİ	0	4	4	0	0	0
31	HATAY	6	22	28	0	10	10
32	ISPARTA	0	4	4	0	3	3
33	MERSİN	15	54	69	2	16	18
34	İSTANBUL	46	211	257	12	118	130
35	İZMİR	34	63	97	9	14	23

Annex-1. Provincial Distribution of the number of PACs and Environmental Permit/Licenses in 2011 (Cont.)

ITEM NO	PROVINCES	PAC ANNEX 1	PAC ANNEX 2	PAC (ANNEX-1+ ANNEX-2)	Env. Per./Lic. (ANNEX-1)	Env. Per./Lic. (ANNEX-2)	Env. Per./Lic. (ANNEX-1+ ANNEX-2)
36	KARS	0	5	5	0	0	0
37	KASTAMONU	1	4	5	0	0	0
38	KAYSERİ	10	28	38	3	5	8
39	KIRKLARELİ	7	13	20	2	0	2
40	KIRŞEHİR	1	4	5	0	1	1
41	KOCAELİ	31	91	122	15	28	43
42	KONYA	5	69	74	6	18	24
43	KÜTAHYA	3	16	19	0	7	7
44	MALATYA	4	19	23	0	2	2
45	MANİSA	7	40	47	1	29	30
46	K.MARAŞ	1	3	4	0	0	0
47	MARDİN	3	3	6	1	1	2
48	MUĞLA	1	44	45	0	18	18
49	MUŞ	1	0	1	0	0	0
50	NEVŞEHİR	1	6	7	1	6	7
51	NİĞDE	2	20	22	1	3	4
52	ORDU	1	16	17	0	2	2
53	RİZE	0	14	14	0	10	10
54	SAKARYA	4	12	16	2	7	9
55	SAMSUN	11	49	60	1	24	25
56	SİİRT	1	1	2	0	1	1
57	SİNOP	0	9	9	0	0	0
58	SİVAS	3	5	8	0	1	1
59	TEKİRDAĞ	22	95	117	6	25	31
60	TOKAT	0	1	1	1	0	1
61	TRABZON	1	45	46	0	13	13
62	TUNCELİ	0	0	0	0	0	0
63	ŞANLIURFA	1	24	25	1	12	13
64	UŞAK	9	2	11	1	1	2
65	VAN	1	5	6	1	0	1
66	YOZGAT	0	6	6	1	2	3
67	ZONGULDAK	2	22	24	1	2	3
68	AKSARAY	3	18	21	2	11	13
69	BAYBURT	0	0	0	0	0	0
70	KARAMAN	1	14	15	0	3	3
71	KIRIKKALE	3	12	15	0	10	10
72	BATMAN	0	2	2	0	1	1

Annex-1. Provincial Distribution of the number of PACs and Environmental Permit/Licenses in 2011 (Cont.)

ITEM NO	PROVINCES	PAC ANNEX 1	PAC ANNEX 2	PAC (ANNEX-1+ ANNEX-2)	Env. Per./Lic. (ANNEX-1)	Env. Per./Lic. (ANNEX-2)	Env. Per./Lic. (ANNEX-1+ ANNEX-2)
73	ŞIRNAK	1	1	2	0	0	0
74	BARTIN	1	2	3	0	1	1
75	ARDAHAN	0	2	2	0	1	1
76	IĞDIR	0	0	0	0	0	0
77	YALOVA	2	4	6	0	5	5
78	KARABÜK	1	8	9	0	1	1
79	KİLİS	0	1	1	0	1	1
80	OSMANİYE	6	6	12	0	0	0
81	DÜZCE	1	14	15	1	3	4
	TOTAL	**416**	**1824**	**2240**	**115**	**696**	**811**

Annex - 2. Amounts of administrative fines applied in accordance with the "Communique on Administrative Fines to be applied under Environmental Law no. 2872 (2011/1)" in 2011

Article 20 of 2872 Numbered Environmental Law	Fine Amounts In Law	Fines To Be Applied Between 1/1/2011 And 31/12/2011
Fine amounts in (a) subparagraph	₺500 ₺1.000	₺710 ₺1.422
Fine amounts in (b) subparagraph	₺24.000 ₺48.000	₺34.189 ₺68.379
Fine amounts in (c) subparagraph	₺6.000 ₺2.000 ₺300	₺8.544 ₺2.847 ₺425
Fine amounts in (d) subparagraph	Double for (b) subparagraph: ₺48.000 ₺96.000 Double for (c) subparagraph: ₺12.000 ₺4.000 ₺600 Concerning residences in the second sentence of (d) subparagraph: ₺600	₺68.379 ₺136.760 ₺17.094 ₺5.696 ₺852 ₺852
Fine amounts in (e) subparagraph	₺10.000	₺14.244
Fine amounts in (f) subparagraph	₺60.000	₺85.475
Fine amounts in (g) subparagraph	₺6.000	₺8544
Fine amounts in (h) subparagraph	₺400 ₺1.200 ₺4.000 ₺12.000	₺568 ₺1.708 ₺5.696 ₺17.094
Fine amounts in item 1 of (ı) subparagraph	Per ton*: ₺40 ₺10 100 KR	₺56,96 ₺14,22 138 KR
Fine amounts in item 2 of (ı) subparagraph	Per ton*: ₺30 ₺6 100 KR	₺42,71 ₺8,52 138 KR
Fine amounts in item 3 of (ı) subparagraph	Per ton*: ₺20 ₺4 100 KR	₺28,47 ₺5,68 138 KR
Fine amounts in item 4 of (ı) subparagraph	Per ton*: ₺10 ₺2 40 KR	₺14,22 ₺2,82 56 KR

Annex - 2. Amounts of administrative fines applied in accordance with the "Communique on Administrative Fines to be applied under Environmental Law no. 2872 (2011/1)" in 2011 (Cont.)

Article 20 of 2872 Numbered Environmental Law	Fine Amounts In Law	Fines To Be Applied Between 1/1/2011 And 31/12/2011
Fine amounts in paragraph six of (ı) subparagraph	₺24.000 ₺600	₺34.189 ₺852
Fine amounts in (i) subparagraph	₺1.000	₺1.422
Fine amounts in (j) subparagraph	₺24.000 ₺600	₺34.189 ₺852
Fine amounts in (k) subparagraph	₺20.000 ₺100.000	₺28.490 ₺142.460
Fine amounts in (l) subparagraph	Per decare*: ₺20 Per cubic meter*: ₺120	₺28,47 ₺170,94
Fine amounts in (m) subparagraph	₺6.000 ₺4.000	₺8.544 ₺5.696
Fine amounts in (n) subparagraph	₺48.000 ₺1.200	₺68.379 ₺1.708
Fine amounts in (o) subparagraph	₺12.000	₺17.094
Fine amounts in (p) subparagraph	₺24.000	₺34.189
Fine amounts in (r) subparagraph	₺24.000 ₺60.000	₺34.189 ₺85.475
Fine amounts in (s) subparagraph	₺100	₺138
Fine amounts in (t) subparagraph	₺2.000.000	₺2.849.232
Fine amounts in (u) subparagraph	₺2.000.000	₺2.849.232
Fine amounts in (v) subparagraph	From ₺100.000 to ₺1.000.000	From ₺142.460 to ₺1.424.615
Fine amounts in (y) subparagraph	From ₺100.000 to ₺1.000.000	From ₺142.460 to ₺1.424.615
Fine amounts in item 5 of provisional article 4	In municipalities; • Whose population is over 100.000: ₺50.000 • Whose population is between 100.000 and 50.000: ₺30.000 TL • Whose population is between 50.000 and 10.000: ₺20.000 • Whose population is between 10.000 and 2.000: ₺10.000 • In Organized Industrial Zones: ₺100.000 • Except from these, in every kind of facility producing industry and waste water: ₺60.000	In municipalities; • Whose population is over 100.000: ₺71.228 • Whose population is between 100.000 and 50.000: ₺42.737 • Whose population is between 50.000 and 10.000: ₺28.490 • Whose population is between 10.000 and 2.000: ₺14.244 • In Organized Industrial Zones: ₺142.460 • Except from these, in every kind of facility producing industry and waste water: ₺85.475

Annex – 3. Number of inspections and amount of fines by provinces

PROVINCE	ROUTINE INSPECTION NUMBER	NON-ROUTINE INSPECTION NUMBER	TOTAL INSPECTION NUMBER	FINE NUMBER	FINE AMOUNTS (₺)
Adana	613	1.758	2.371	21	934.081
Adıyaman	61	102	163	3	45.985
Afyonkarahisar	35	596	631	35	298.822
Ağrı	176	6	182	3	64.349
Aksaray	108	45	153	10	242.149
Amasya	4	142	146	14	244.767
Ankara	17	1.331	1.348	58	1.847.025
Antalya	40	1.512	1.552	90	1.306.240
Ardahan	93	65	158	14	295.616
Artvin	120	113	233	6	114.601
Aydın	0	802	802	31	1.129.744
Balıkesir	18	758	776	55	873.903
Bartın	5	203	208	14	860.798
Batman	222	708	930	12	96.842
Bayburt	61	108	169	4	85.464
Bilecik	14	70	84	9	177.088
Bingöl	19	24	43	6	42.844
Bitlis	60	14	74	6	102.921
Bolu	38	484	522	22	280.394
Burdur	151	301	452	9	59.505
Bursa	21	619	640	187	2.384.814
Çanakkale	330	240	570	8	406.341
Çankırı	145	47	192	17	197.975
Çorum	347	640	987	73	180.268
Denizli	39	584	623	3	59.827
Diyarbakır	130	56	186	9	190.876
Düzce	20	389	409	35	507.178
Edirne	321	448	769	16	12.070
Elazığ	79	905	984	18	265.080
Erzincan	170	159	329	4	64.099
Erzurum	177	740	917	20	167.469
Eskişehir	20	711	731	43	463.908
Gaziantep	353	772	1.125	58	367.523
Giresun	92	439	531	26	402.104
Gümüşhane	5	58	63	1	14.244
Hakkari	350	420	770	0	0
Hatay	216	511	727	37	469.410
Iğdır	100	106	206	11	6.350

Annex – 3. Number of inspections and amount of fines by provinces (Cont.)

PROVINCE	ROUTINE INSPECTION NUMBER	NON-ROUTINE INSPECTION NUMBER	TOTAL INSPECTION NUMBER	FINE NUMBER	FINE AMOUNTS (₺)
Isparta	25	236	261	8	42.387
İstanbul	3.433	1.524	4.957	52	10.676.658
İzmir	965	673	1.638	58	2.089.786
Kahramanmaraş	368	891	1.259	18	343.843
Karabük	20	161	181	37	285.095
Karaman	0	0	0	0	0
Kars	41	70	111	10	29.746
Kastamonu	42	78	120	162	126.350
Kayseri	371	352	723	48	650.063
Kırıkkale	105	341	446	14	54.844
Kırklareli	443	760	1.203	6	299.153
Kırşehir	4	65	69	3	51.277
Kilis	79	413	492	2	9.675
Kocaeli	145	1.599	1.744	83	3.136.841
Konya	20	276	296	111	808.495
Kütahya	20	193	213	36	5.010.579
Malatya	113	80	193	15	175.188
Manisa	1.178	603	1.781	16	189.844
Mardin	55	194	249	7	84.309
Mersin	403	527	930	36	1.004.310
Muğla	398	400	798	33	695.748
Muş	111	46	157	4	2.640
Nevşehir	18	361	379	32	36.254
Niğde	18	217	235	4	65.521
Ordu	138	360	498	29	1.096.099
Osmaniye	20	707	727	20	398.102
Rize	111	357	468	18	292.826
Sakarya	407	328	735	22	1.135.575
Samsun	96	1.708	1.804	24	450.769
Siirt	451	133	584	2	79.772
Sinop	20	60	80	11	95.422
Sivas	106	162	268	30	376.177
Şanlıurfa	448	30	478	8	296.709
Şırnak	66	12	78	1	28.490
Tekirdağ	567	1.721	2.288	140	5.294.534
Tokat	68	72	140	15	179.646
Trabzon	310	726	1.036	28	399.890
Tunceli	13	44	57	5	62.587

Annex – 3. Number of inspections and amount of fines by provinces (Cont.)

PROVINCE	ROUTINE INSPECTION NUMBER	NON-ROUTINE INSPECTION NUMBER	TOTAL INSPECTION NUMBER	FINE NUMBER	FINE AMOUNTS (₺)
Uşak	101	185	286	14	68.493
Van*	0	0	0	0	0
Yalova	17	270	287	8	158.267
Yozgat	35	0	35	0	0
Zonguldak	178	95	273	37	591.394
TOTAL	**16.297**	**34.016**	**50.313**	**2.195**	**52.136.032**
DGEIAPI	**704**	**25**	**729**	**194**	**4.292.737**
SUM TOTAL	**17.001**	**34.041**	**51.042**	**2.389**	**56.428.769**

** Data regarding Van could not been processed because of earthquake.*

Annex – 4. Distribution of inspection types according to provinces

PROVINCES	COMBINED	AIR	WATER	SOIL	WASTE	CHEMICALS	NOISE	DEEP SEA DISCHARGE	EIA	TOTAL
Adana	106	880	114	0	84	0	72	0	1.115	2.371
Adıyaman	3	59	17	0	56	0	10	0	18	163
Afyonkarahisar	20	32	14	0	210	0	18	0	337	631
Ağrı	30	85	4	0	5	0	3	0	55	182
Aksaray	45	33	13	0	29	0	0	0	33	153
Amasya	4	43	12	1	36	0	14	0	36	146
Ankara	17	650	223	0	434	0	24	0	0	1.348
Antalya	20	458	182	135	337	66	90	0	264	1.552
Ardahan	11	36	9	3	76	0	3	0	20	158
Artvin	10	66	51	11	45	0	5	0	45	233
Aydın	0	248	360	0	120	0	74	0	0	802
Balıkesir	18	211	73	0	233	2	77	0	162	776
Bartın	0	48	62	0	48	0	42	0	8	208
Batman	9	542	70	67	73	0	29	0	140	930
Bayburt	0	35	26	7	23	0	0	0	78	169
Bilecik	14	15	11	0	29	0	8	0	7	84
Bingöl	10	2	4	0	6	0	0	0	21	43
Bitlis	0	60	4	0	0	0	0	0	10	74
Bolu	10	80	161	1	226	0	12	0	32	522
Burdur	11	95	58	101	101	0	2	0	84	452
Bursa	21	162	271	0	108	0	35	0	43	640
Çanakkale	18	175	110	2	100	0	138	0	27	570
Çankırı	15	52	6	27	23	0	19	0	50	192
Çorum	19	285	190	20	255	15	120	0	83	987
Denizli	20	252	66	0	128	19	117	0	21	623
Diyarbakır	20	10	6	0	16	0	0	0	134	186
Düzce	20	99	103	0	24	0	26	0	137	409
Edirne	6	75	239	0	370	1	2	0	76	769
Elazığ	20	228	69	14	242	4	4	0	403	984
Erzincan	3	158	36	0	43	0	14	0	75	329
Erzurum	20	455	37	0	210	3	31	0	161	917
Eskişehir	20	113	24	0	328	0	108	0	138	731
Gaziantep	20	666	19	0	249	0	13	0	158	1.125
Giresun	20	88	168	0	117	0	42	0	96	531
Gümüşhane	35	2	10	0	3	0	2	0	11	63
Hakkari	200	110	70	20	170	0	30	0	170	770
Hatay	20	108	288	14	35	54	118	0	90	727
Iğdır	0	119	2	2	50	0	20	0	13	206

Annex – 4. Distribution of inspection types according to provinces (Cont.)

PROVINCES	COMBINED	AIR	WATER	SOIL	WASTE	CHEMICALS	NOISE	DEEP SEA DISCHARGE	EIA	TOTAL
Isparta	10	10	37	0	161	0	43	0	0	261
İstanbul	168	1.178	46	14	557	10	500	0	2.484	4.957
İzmir	20	113	149	0	279	0	49	0	1.028	1.638
Kahramanmaraş	20	423	184	63	310	0	131	0	128	1.259
Karabük	34	40	12	0	91	0	4	0	0	181
Karaman	0	0	0	0	0	0	0	0	0	0
Kars	10	25	33	0	12	0	0	0	31	111
Kastamonu	25	22	2	33	8	0	0	0	30	120
Kayseri	15	248	84	8	135	7	45	0	181	723
Kırıkkale	11	121	38	8	143	0	49	0	76	446
Kırklareli	19	492	230	0	347	0	44	0	71	1.203
Kırşehir	4	14	9	2	28	0	7	0	5	69
Kilis	114	197	16	0	72	0	54	0	39	492
Kocaeli	94	1.020	239	0	250	0	0	0	141	1.744
Konya	20	24	28	6	120	0	12	0	86	296
Kütahya	20	62	47	16	48	0	4	0	16	213
Malatya	11	63	19	0	36	0	0	0	64	193
Manisa	19	438	268	4	128	0	265	0	659	1.781
Mardin	2	108	23	0	45	0	38	0	33	249
Mersin	20	308	182	31	211	0	146	1	31	930
Muğla	4	120	238	0	80	0	195	8	153	798
Muş	10	95	16	2	19	0	6	0	9	157
Nevşehir	18	218	28	0	45	1	5	0	64	379
Niğde	18	72	37	0	36	0	17	0	55	235
Ordu	18	80	93	10	72	0	72	2	151	498
Osmaniye	20	155	108	0	149	0	155	0	140	727
Rize	19	187	73	0	75	0	15	0	99	468
Sakarya	20	226	84	30	70	0	0	0	305	735
Samsun	20	332	385	10	800	40	120	0	97	1.804
Siirt	8	444	13	0	19	0	56	0	44	584
Sinop	20	0	32	0	19	1	0	0	8	80
Sivas	25	57	39	6	18	0	75	0	48	268
Şanlıurfa	10	160	116	15	140	0	37	0	0	478
Şırnak	0	25	0	0	45	0	0	0	8	78
Tekirdağ	20	926	507	4	252	0	10	0	569	2.288
Tokat	20	14	21	3	6	0	29	0	47	140
Trabzon	10	272	302	0	44	1	7	0	400	1.036
Tunceli	4	18	4	0	4	0	9	0	18	57

Annex – 4. Distribution of inspection types according to provinces (Cont.)

PROVINCES	COMBINED	AIR	WATER	SOIL	WASTE	CHEMICALS	NOISE	DEEP SEA DISCHARGE	EIA	TOTAL
Uşak	20	63	87	0	10	0	2	0	14	286
Van	0	0	0	0	0	0	0	0	0	0
Yalova	35	70	44	2	75	0	27	0	34	287
Yozgat	5	2	2	1	2	1	2	0	20	35
Zonguldak	1	172	29	0	44	0	6	1	20	273
TOTAL	**1.796**	**15.449**	**7.086**	**693**	**9.737**	**225**	**3.558**	**12**	**11.757**	**50.313**

Annex – 5. Number of inspections and amount of fines applied by provincial directorates in 2009, 2010 and 2011

PROVINCES	INSPECTION NUMBERS			FINE AMOUNTS (₺)		
YEARS	2009	2010	2011	2009	2010	2011
Adana	1.800	2.152	2.371	1.417.159	1.175.590	934.081
Adıyaman	107	102	163	97.158	7.934	45.985
Afyonkarahisar	110	218	631	176.667	3.926	298.822
Ağrı	183	254	182	31.062	2.792	64.349
Aksaray	188	107	153	99.149	91.076	242.149
Amasya	82	175	146	75.752	97.384	244.767
Ankara	1.051	1.609	1.348	1.870.175	3.257.365	1.847.025
Antalya	1.068	1.369	1.552	572.108	1.198.190	1.306.240
Ardahan	79	68	158	52.490	157.267	295.616
Artvin	99	138	233	290.209	193.854	114.601
Aydın	747	648	802	967.913	34.598	1.129.744
Balıkesir	792	495	776	465.931	1.667.790	873.903
Bartın	92	211	208	98.612	157.705	860.798
Batman	805	1.035	930	7.764	214.799	96.842
Bayburt	45	48	169	0	35.372	85.464
Bilecik	311	138	84	120.865	222.878	177.088
Bingöl	39	74	43	15.526	22.867	42.844
Bitlis	69	193	74	51.768	148.656	102.921
Bolu	102	408	522	131.776	283.464	280.394
Burdur	157	419	452	54.501	98.812	59.505
Bursa	503	1.554	640	2.314.090	1.619.493	2.384.814
Çanakkale	454	453	570	543.695	1.031.543	406.341
Çankırı	98	149	192	57.971	172.003	197.975
Çorum	436	517	987	543.861	517.866	180.268
Denizli	229	266	623	31.062	31.745	59.827
Diyarbakır	87	563	186	165.626	2.516.813	190.876
Düzce	343	492	409	458.078	319.105	507.178
Edirne	401	763	769	123.545	331.053	12.070
Elazığ	587	544	984	177.729	264.943	265.080
Erzincan	33	297	329	43.755	26.452	64.099
Erzurum	773	334	917	293.306	361.606	167.469
Eskişehir	917	827	731	337.633	319.858	463.908
Gaziantep	998	954	1.125	284.905	336.367	367.523
Giresun	769	405	531	116.401	419.538	402.104
Gümüşhane	0	179	63	0	33.094	14.244
Hakkâri	136	75	770	0	26.452	0
Hatay	274	317	727	2.561.833	443.177	469.410

Annex – 5. Number of inspections and amount of fines applied by provincial directorates in 2009, 2010 and 2011 (Cont.)

PROVINCES	INSPECTION NUMBERS			FINE AMOUNTS (₺)		
YEARS	2009	2010	2011	2009	2010	2011
Iğdır	30	117	206	2.000	1.973	6.350
Isparta	312	236	261	132.677	175.390	42.387
İstanbul	5.154	6.072	4.957	1.392.267	5.894.647	10.676.658
İzmir	1.801	2.619	1.638	2.183.008	1.764.220	2.089.786
Kahramanmaraş	318	579	1.259	137.589	720.267	343.843
Karabük	52	179	181	55.906	13.226	285.095
Karaman	65	61	0	0	0	0
Kars	27	100	111	0	119.570	29.746
Kastamonu	77	144	120	141.414	292.017	126.350
Kayseri	526	401	723	249.721	887.412	650.063
Kırıkkale	33	248	446	62.124	233.463	54.844
Kırklareli	235	320	1.203	186.360	457.599	299.153
Kırşehir	25	135	69	124.620	0	51.277
Kilis	373	385	492	193.292	11.150	9.675
Kocaeli	925	1.463	1.744	1.558.722	1.391.115	3.136.841
Konya	69	312	296	366.797	326.506	808.495
Kütahya	152	249	213	82.829	1.001.743	5.010.579
Malatya	40	350	193	197.250	242.484	175.188
Manisa	629	1.673	1.781	227.913	642.712	189.844
Mardin	249	226	249	349.768	85.917	84.309
Mersin	68	997	930	1.201.074	1.940.330	1.004.310
Muğla	152	676	798	2.532.802	816.913	695.748
Muş	77	87	157	14.351	215.107	2.640
Nevşehir	48	84	379	54.330	27.742	36.254
Niğde	172	271	235	47.224	126.517	65.521
Ordu	344	289	498	359.599	434.188	1.096.099
Osmaniye	397	402	727	337.131	219.713	398.102
Rize	110	281	468	264.670	692.968	292.826
Sakarya	350	480	735	1.337.523	904.304	1.135.575
Samsun	667	971	1.804	248.438	1.183.548	450.769
Siirt	25	483	584	0	0	79.772
Sinop	306	109	80	13.206	442.511	95.422
Sivas	86	260	268	275.082	448.168	376.177
Şanlıurfa	348	863	478	449.398	1.598.339	296.709
Şırnak	0	1	78	214.923	7.934	28.490
Tekirdağ	966	1.754	2.288	3.384.130	5.002.499	5.294.534
Tokat	152	139	140	259.560	651.859	179.646

Annex – 5. Number of inspections and amount of fines applied by provincial directorates in 2009, 2010 and 2011 (Cont.)

PROVINCES	INSPECTION NUMBERS			FINE AMOUNTS (₺)		
YEARS	2009	2010	2011	2009	2010	2011
Trabzon	1.750	659	1.036	1.664.102	519.550	399.890
Tunceli	35	58	57	0	13.226	62.587
Uşak	506	320	286	7.891	146.120	68.493
Van	267	324	0	21.857	284.495	0
Yalova	180	239	287	532.749	242.275	158.267
Yozgat	23	174	35	13.262	35.430	0
Zonguldak	391	343	273	614.820	1.270.336	591.394
TOTAL	33.476	44.683	50.313	36.142.454	49.328.910	52.136.032

Annex– 6. Provincial distribution of fine amounts and non-compliance numbers

	AIR		WATER		SOIL		WASTE		CHEMICALS		NOISE		DEEP SEA DISCAHRGE		EIA		OTHERS		TOTAL		
PROVINCES	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Number of The Closure of the Activity
Adana	710	1	410.271	6	0	0	435.924	2	0	0	0	0	0	0	87.176	12	0	0	934.081	21	0
Adıyaman	8.544	1	0	0	0	0	31.745	1	0	0	0	0	0	0	5.696	1	0	0	45.985	3	0
Afyonkarahisar	8.544	1	8.544	1	65.574	12	0	0	0	0	0	0	0	0	216.160	21	0	0	298.822	35	0
Ağrı	34.189	1	0	0	10.224	1	0	0	0	0	0	0	0	0	0	0	19.936	1	64.349	3	0
Aksaray	0	0	0	0	0	0	34.189	1	0	0	0	0	0	0	207.960	9	0	0	242.149	10	2
Amasya	38.659	0	0	0	0	0	690	0	0	0	0	0	0	0	191.178	8	14.240	6	244.767	14	14
Ankara	102.567	2	136.756	4	1.128.237	32	406.229	4	0	0	0	0	0	0	0	0	73.236	16	1.847.025	58	0
Antalya	43.221	13	490.858	10	170.945	4	48.841	2	0	0	230.560	10	0	0	250.605	21	71.210	30	1.306.240	90	6
Ardahan	710	1	170.950	2	5.128	1	276	2	0	0	0	0	0	0	107.160	7	11.392	1	295.616	14	1
Artvin	34.189	1	76.312	2	0	0	0	0	0	0	0	0	0	0	4.100	2	0	0	114.601	5	0
Aydın	710	1	103.419	3	35.041	1	1.656	12	0	0	7.400	4	0	0	981.518	9	0	0	1.129.744	30	1
Balıkesir	38.364	43	322.561	4	0	0	435.924	2	0	0	5.696	1	0	0	71.358	5	0	0	873.903	55	0
Bartın	1.220	2	307.706	4	0	0	530.928	5	0	0	0	0	0	0	20.944	3	0	0	860.798	14	0
Batman	48.413	10	34.189	1	0	0	0	0	0	0	0	0	0	0	0	0	14.240	1	96.842	12	0
Bayburt	0	0	0	0	0	0	0	0	0	0	0	0	0	0	85.464	4	0	0	85.464	4	1
Bilecik	0	0	34.189	1	0	0	119.655	3	0	0	0	0	0	0	23.244	5	0	0	177.088	9	0
Bingöl	0	0	0	0	0	0	0	0	0	0	0	0	0	0	42.844	6	0	0	42.844	6	0
Bitlis	0	0	0	0	0	0	34.189	1	0	0	0	0	0	0	68.732	5	0	0	102.921	6	0
Bolu	33.162	7	170.945	5	34.981	2	17.502	3	0	0	0	0	0	0	23.804	3	0	0	280.394	20	2
Burdur	0	0	0	0	34.189	1	828	6	0	0	0	0	0	0	24.488	2	0	0	59.505	9	0
Bursa	169.089	113	811.985	20	0	0	1.017.397	17	0	0	0	0	0	0	386.343	37	0	0	2.384.814	187	12
Çanakkale	105.839	3	102.567	3	34.189	1	34.189	1	0	0	78.333	10	0	0	51.224	8	0	0	406.341	26	8
Çankırı	0	0	34.189	1	0	0	138	0	0	0	5.696	1	0	0	157.952	14	0	0	197.975	16	0
Çorum	62.769	40	0	0	0	0	50.639	25	0	0	12.528	4	0	0	54.332	4	0	0	180.268	73	0
Denizli	42.733	2	0	0	0	0	0	0	0	0	17.094	1	0	0	0	0	0	0	59.827	3	0
Diyarbakır	23.802	3	85.475	1	0	0	34.189	1	0	0	0	0	0	0	41.714	3	5.696	1	190.876	9	3
Düzce	36.929	5	287.472	7	6.456	8	828	2	0	0	17.094	1	0	0	108.355	7	50.044	5	507.178	35	0
Edirne	12.070	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12.070	16	0
Elazığ	0	0	102.567	4	0	0	97.655	5	0	0	0	0	0	0	64.858	9	0	0	265.080	18	1
Erzincan	0	0	0	0	0	0	0	0	0	0	0	0	0	0	42.732	3	21.367	1	64.099	4	0
Erzurum	728	1	0	0	0	0	25.633	3	0	0	0	0	0	0	141.108	16	0	0	167.469	20	12

Annex– 6. Provincial distribution of fine amounts and non-compliance numbers (Cont.)

	AIR		WATER		SOIL		WASTE		CHEMICALS		NOISE		DEEP SEA DISCAHRGE		EIA		OTHERS		TOTAL		
PROVINCES	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Number of The Closure of the Activity
Eskişehir	67.743	31	68.378	1	0	0	247.867	4	0	0	76.920	5	0	0	3.000	2	0	0	463.908	43	2
Gaziantep	90.338	44	0	0	0	0	177.477	8	0	0	0	0	0	0	99.708	6	0	0	367.523	58	1
Giresun	4.970	7	273.512	7	0	0	414	1	0	0	0	0	0	0	123.208	11	0	0	402.104	26	3
Gümüşhane	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14.244	1	0	0	14.244	1	0
Hakkâri	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hatay	44.581	19	164.839	2	0	0	111.775	5	31.745	1	85.470	5	0	0	31.000	5	0	0	469.410	37	1
Iğdır	6.350	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6.350	11	0
Isparta	0	0	0	0	279	1	17.088	2	0	0	0	0	0	0	0	0	25.020	6	42.387	9	0
İstanbul	21.810	35	102.567	3	34.189	1	8.242.134	3	0	0	0	0	0	0	2.260.090	10	15.868	2	10.676.658	54	16
İzmir	312.081	13	270.798	2	0	0	1.277.647	18	0	0	0	0	0	0	229.260	13	0	0	2.089.786	46	2
Kahramanmaraş	35.546	6	239.321	5	0	0	0	0	0	0	0	0	0	0	68.976	7	0	0	343.843	18	0
Karabük	124.579	33	153.854	1	0	0	966	3	0	0	0	0	0	0	0	0	5.696	1	285.095	38	0
Karaman	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Kars	710	1	552	1	0	0	0	0	0	0	0	0	0	0	14.244	1	14.240	7	29.746	10	0
Kastamonu	100.820	156	0	0	1.704	2	138	1	0	0	0	0	0	0	23.688	3	0	0	126.350	162	0
Kayseri	101.255	24	282.052	11	0	0	160.640	6	0	0	0	0	0	0	106.116	7	0	0	650.063	48	3
Kırıkkale	21.348	8	852	1	0	0	0	0	0	0	0	0	0	0	32.644	5	0	0	54.844	14	0
Kırklareli	0	0	290.609	5	0	0	0	0	0	0	0	0	0	0	8.544	1	0	0	299.153	6	0
Kırşehir	0	0	0	0	34.189	1	17.088	2	0	0	0	0	0	0	0	0	0	0	51.277	3	0
Kilis	0	0	0	0	0	0	8.544	1	0	0	0	0	0	0	1.131	1	0	0	9.675	2	0
Kocaeli	1.161.241	54	521.382	13	0	0	1.162.374	16	0	0	0	0	0	0	291.844	0	0	0	3.136.841	83	3
Konya	9.080	13	154.267	4	0	0	396.148	79	0	0	34.188	2	0	0	214.812	13	0	0	808.495	111	0
Kütahya	146.837	16	0	0	35.179	3	4.812.297	11	0	0	0	0	0	0	16.266	2	0	0	5.010.579	32	0
Malatya	710	1	63.378	2	0	0	0	0	0	0	0	0	0	0	99.708	10	11.392	2	175.188	15	6
Manisa	23.440	7	68.378	2	0	0	0	0	0	0	0	0	0	0	98.026	7	0	0	189.844	16	0
Mardin	34.189	1	0	0	0	0	8.544	1	0	0	17.088	3	0	0	24.488	2	0	0	84.309	7	0
Mersin	42.733	2	290.614	4	4.410	6	469.503	3	0	0	11.392	2	0	0	177.114	18	8.544	1	1.004.310	36	10
Muğla	95.467	8	44.963	4	68.378	2	0	0	0	0	34.188	2	0	0	452.752	17	0	0	695.748	33	2
Muş	2.640	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2.640	4	0
Nevşehir	22.010	31	0	0	0	0	0	0	0	0	0	0	0	0	14.244	1	0	0	36.254	32	0
Niğde	0	0	0	0	0	0	42.733	2	0	0	0	0	0	0	22.788	2	0	0	65.521	4	0

Annex– 6. Provincial distribution of fine amounts and non-compliance numbers (Cont.)

	AIR		WATER		SOIL		WASTE		CHEMICALS		NOISE		DEEP SEA DISCAHRGE		EIA		OTHERS		TOTAL		
PROVINCES	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Fine Amount (₺)	Number of Non-comp.	Number of The Closure of the Activity
Ordu	0	0	0	0	0	0	623.946	19	0	0	0	0	0	0	472.153	10	0	0	1.096.099	29	0
Osmaniye	19.935	4	219.365	12	0	0	142.456	1	0	0	0	0	0	0	16.346	3	0	0	398.102	20	2
Rize	0	0	85.475	5	34.189	1	0	0	0	0	17.094	1	0	0	99.108	6	56.960	5	292.826	18	0
Sakarya	0	0	113.553	2	205.134	4	632.514	3	0	0	0	0	0	0	176.440	12	7.934	1	1.135.575	22	3
Samsun	150.981	12	68.378	2	63.490	2	151.676	6	0	0	0	0	0	0	16.244	2	0	0	450.769	24	1
Siirt	0	0	0	0	0	0	71.228	1	0	0	0	0	0	0	0	0	8.544	1	79.772	2	0
Sinop	12.804	7	82.618	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	95.422	10	0
Sivas	0	0	42.733	3	70.082	2	0	0	0	0	39.878	4	0	0	223.484	18	0	0	376.177	27	11
Şanlıurfa	0	0	94.019	2	202.690	4	0	0	0	0	0	0	0	0	0	0	0	0	296.709	6	0
Şırnak	0	0	0	0	0	0	28.490	1	0	0	0	0	0	0	0	0	0	0	28.490	1	0
Tekirdağ	792.703	61	2.937.881	38	102.567	3	755.834	17	0	0	313.388	20	0	0	392.161	21	0	0	5.294.534	160	5
Tokat	10.305	4	0	0	34.189	1	8.958	2	0	0	0	0	0	0	126.194	8	0	0	179.646	15	0
Trabzon	48.824	6	129.406	10	0	0	0	0	0	0	0	0	0	0	221.660	12	0	0	399.890	28	1
Tunceli	528	1	31.745	1	0	0	0	0	0	0	0	0	0	0	30.314	3	0	0	62.587	5	0
Uşak	1.420	2	42.733	2	0	0	9.648	9	0	0	0	0	0	0	14.692	1	0	0	68.493	14	0
Van	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Yalova	0	0	119.664	2	34.189	1	414	4	0	0	0	0	0	0	4.000	2	0	0	158.267	9	0
Yozgat	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Zonguldak	305.889	21	0	0	138	1	242.635	10	0	0	0	0	0	0	42.732	5	0	0	591.394	37	0
TOPLAM	**4.661.028**	**910**	**10.648.841**	**229**	**2.449.960**	**98**	**23.180.420**	**337**	**31.745**	**1**	**1.004.007**	**76**	**0**	**0**	**9.724.472**	**472**	**435.559**	**88**	**52.136.032**	**2.211**	**135**

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