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POLICY VISION ROADMAP for CIVIL SOCIETY

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EU-Turkey Climate Policy Dialogue
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ERCST
European Roundtable on
Climate Change and
Sustainable Transition



EU-Turkey
Climate Policy Dialogue



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ASSOCIATION**



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List of Abbreviations

BMU	German Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection	JCC	Joint Consultative Committee
		JTF	Just Transition Fund
CAN	Climate Action Network	JTM	Just Transition Mechanism
CBAM	Carbon Border Adjustment Mechanism	LULUCF	Land use and forestry regulation
CEAP	Circular Economy Action Plan	MW	Megawatts
CJEU	Court of Justice of the European Union	NGO	Non-governmental organization
CO2e	Carbon dioxide equivalent	OECD	Organization for Economic Co-operation and Development
CoR	Committee of Regions		
CPR	Common Provisions Regulation	PMR	Partnership for Market Readiness
CRC-M	Carbon Removals Certification Mechanism	RED	Renewable Energy Directive
CSD	Civil Society Dialogue	SDG	Sustainable Development Goal
CSO	Civil Society Organization	SMEs	Small and Medium Enterprises
DERBiS	Associations Information System	SPI	Sustainable Products Initiative
EBRD	European Bank for Reconstruction and Development		
EBSO	Aegean Region Chamber of Industry		
EC	European Commission		
ECA	European Court of Auditors		
ECB	European Central Bank		
EEA	European Energy Agency		
EED	Energy Efficiency Directive		
EESC	Economic and Social Committee		
EGD	European Green Deal		
EP	European Parliament		
ESR	Efforts sharing regulation		
ETD	Energy Taxation Directive		
ETS	Emissions Trading System		
EU	European Union		
EUKI	European Climate Initiative		
Eurostat	European Statistical Office		
GCCA+	Global Climate Change Alliance Plus		
GDP	Gross domestic product		
GHG	Greenhouse Gas Emissions		
INDC	Intended Nationally Determined Contribution		
IPA	Instrument for Pre-Accession Assistance		
ISO	İstanbul Chamber of Industry		
IZKA	İzmir Development Agency		

PREAMBLE



The Civil Society Dialogue Programme between Turkey and EU (CSD) implemented through EU financial assistance was designed as a platform to bring together civil society organizations (CSOs) from Turkey and EU Member states around a common subject and to ensure that societies get to know each other, engage in exchange of information, and establish sustained dialogue. The programme was initiated in 2008 and it is ongoing for more than 10 years.

Within the scope of the Programme, which has been implemented for six periods, we have provided a total of 54.3 million Euros for 418 projects carried out in different fields. The Programme have reached various types of civil society organisations operating across Turkey and the European Union, such as associations, foundations, universities, professional groups, chambers and youth initiatives. Thanks to the dialogue projects, volunteers acting in different fields of civil society came together in pursuit of common goals to lift each other up through sharing their experiences.

The programme, which became a ground for joint studies in many different fields such as education, energy, environment, judiciary and fundamental rights, social policy and employment, education and culture, justice, freedom and security, business and industrial policy, agriculture and fisheries, information society and media, customs union, free movement of workers, consumer and health protection, has come up as an important step towards eliminating the prejudices existing between Turkey and the EU, strengthening social and cultural dialogue, and ensuring Turkey's societal integration into Europe.

The "Climate Dialogue" Project, supported within the sixth term of the programme and carried out by the European Roundtable on Climate Change and Sustainable Transition (ERCST) from Belgium in partnership with the Climate Research Association (IAD) has developed a holistic policy document and roadmap to align Turkey's climate policy with the EU. I hope this document will become essential that both civil society, private sector and public can benefit from it while preparing their action plans in the upcoming period.

I would like to take this opportunity to thank the European Roundtable on Climate Change and Sustainable Transition and Climate Research Association for their contributions to the field of environment and climate with the Climate Dialogue Project they have successfully carried out.

Bülent ÖZCAN

TURKONFED

Engaging civil society stakeholders in the climate diplomacy and dialogue efforts is an important first step towards more inclusive and widely accepted climate policies and targets. Stakeholders from our governments, businesses, and civil societies need to join forces to align efforts and to tackle climate emergency starting from our European continent. This is also key to reenergize and enhance Turkey's European integration partnership. It is critical that we step up the role of civil society and continue to deepen this dialogue in a more comprehensive and structured way and share the outcomes with a wider audience both in Turkey and in the EU and with the decision makers.

There is a delicate balance between climate ambitions, their economic impact and implications for citizens. The transparency and fairness with respect to burden sharing is a key challenge. As green growth can translate into opportunities for businesses and ways for international cooperation or competition, it may inadvertently result in socio-economic disruptions and uneven burden on the economically disadvantaged. Climate change mitigation requires massive investment in energy system decarbonization, breakthrough green technologies, eco-innovation, substantial new capacity for infrastructure and industry transition. While fair burden sharing of the transition to carbon neutrality is already a challenging topic among EU countries, it is even more challenging for the rest of Europe and global partners which are not part of the EU Just Transition mechanism. This is specifically true for Turkey with highly integrated European value chains. Ensuring compliance with the World Trade Organization provisions and revisiting available tools and roadmaps for coordinating international efforts are needed to achieve clear direction for the regional and international alignment of EU's climate policies. In order for the EU to achieve its climate neutrality and sustainable development goals on the European continent, it will need to ensure close cooperation with its key economic and integration partners. For this level of close cooperation, we need clear and aligned roadmaps, milestones and direction to achieve our ambitious goals.

In this ambitious green transformation agenda small and medium sized enterprises (SMEs) need our special attention and support. We need to prioritize policies that will support the green transformation of Turkish SMEs. "Greening of the SME Strategy" must be addressed at the national level as well as at the level of

EU - Turkey bilateral cooperation. The climate crisis priorities and challenges of the European Union SMEs and Turkish SMEs intersect: From accessing green finance to building eco-innovation capacity, access to information and mitigating the additional administrative burden of complying with new climate legislations come to the fore. Joint SME mechanisms and platforms should be established to support us in solving our common challenges together. SMEs' green transition should be addressed holistically.

The EU is Turkey's largest export market and import provider and more than 1/3 of Turkey's exports originates from SMEs. The breakdown of the export markets of SMEs shows that almost half of the total SME export is directed towards the EU countries. While the impact on micro and small enterprises seems to be limited at the first stage of Carbon Border Adjustment Mechanism due to their low export density to the EU, CBAM is likely to influence procurement decisions across the value chains of manufacturers operating on a large and medium scale. As a result, micro and small businesses that are suppliers of larger companies are likely to be affected indirectly by the CBAM.

Without the green transformation of SMEs, the European continent cannot be carbon neutral. SMEs can play an important role in mitigating environmental impact and are the driving force in creating both employment and value added. In Turkey, SMEs in non-agricultural sectors account for half of the total turnover and over 70 percent of employment. Although the individual effects of SMEs in ensuring the green transformation are limited, their cumulative effects are large. In the transition to a low-carbon economy, important opportunities appear for SMEs in the areas of resource efficiency and circular economy but SME guidance as well as eco-innovation capacities need to be enhanced. SMEs are well embedded actors to their local communities. The positive impact of addressing SMEs in climate policies will be amplified within the broader society.

Finally, Turkey's high level of integration to the European economy and the legal framework provided by the EU - Turkey Customs Union need to be considered when addressing CBAM, Fit-for-55 package, and other Green Deal related legislative acts. Establishing a structural dialogue and cooperation on the CBAM and the Green Deal in general between the EU and Turkey is critical and urgent. Any delay on such cooperation will disrupt the integrated supply chains in the EU and Turkey and undermine economic recovery, create divergence in the

climate goals and climate related regulatory alignment. The newly established Turkey Investment Platform and the existing mechanism between the EU and Turkey should be deepened to ensure alignment of the Turkish legal framework with the EU acquis while preserving the legal basis of the relations. The political and technical cooperation in the field of sustainable development and green transition is crucial to pave the way for Turkey's integration into the European Green Deal and this cooperation can be extended to circular economy, green technologies, research and innovation, sustainable finance, renewable energy, and industrial transition pathways for sustainability including for SMEs. These joint efforts, in turn, will support Turkey's contribution to the global leadership of the EU on green transition, as well as resilience and competitiveness of the EU and broader Europe. The EU - Turkey High Level Climate Dialogues and its working groups on carbon pricing and climate adaptation as well as the EU-Turkey Climate Policy Dialogue with civil society pave the way toward enhanced cooperation.

Appropriate and fair alignment mechanism, concrete tools and a collaboration roadmap can prove useful to have a clear direction. The most comprehensive and legally sound platform to achieve a common sustainability agenda would be the structural framework provided by the EU - Turkey Customs Union modernization. The modernization of the EU-TR Customs Union should be based on comprehensive economic integration, sustainable development, digitalization and green transformation with an SME chapter. Also the modernization of the Customs Union between Turkey and the EU has been a joint call of European business.

As a member of SMEUnited - European Association for SMEs, TÜRKONFED is the largest independent and voluntary-based representative organization of some 40,000 Turkish businesses representing all regions of Turkey and comprising the highest number of women's associations. TÜRKONFED remains committed to the democratic and sustainable development of Turkey along with digital and green transition, advocates Turkey's EU integration process, is an unequivocal supporter of women's rights, rule of law and democratic freedoms and thus, undertakes numerous initiatives in this respect including the Business for Goals Platform (B4G) cofounded by TÜRKONFED, United Nations Development Programme and TÜSİAD, as well as its "European Green Deal and SMEs" report and awareness raising activities on green transition in Turkey.

1. INTRODUCTION

Civil society plays a catalytic role in policymaking in a changing climate. Civil society can push for new laws, programmes, policies, or strategies on climate change, hold governments to account on their commitments and look after the interests of vulnerable groups and those most affected by climate change.

The EU is fighting climate change through ambitious policies. In the last decade the EU has developed a constellation of climate policies and initiative including the ones under the EGD and the recently published Fit for 55 package. On the other hand, Turkey is also making a considerable progress to advance its climate agenda and has continued to align with the EU acquis especially in the climate front.

To support and accelerate this process the 'EU-Turkey climate policy dialogue' established a dialogue between Turkish and European civil society organizations (CSO) on the articulation of climate change policy between the EU and Turkey. The dialogue is also meant to help CSOs in their key role to mainstream climate ambition and help with the development and implementation of climate change policies in Turkey.

The Policy Vision Roadmap for Civil Society presents the outcomes of the project activities and dialogue between European and Turkish civil society which took place during the past year.

The Policy Vision Roadmap also aims to provide a blueprint for CSOs on how to better articulate their vision on climate change, align Turkish climate policy with the EU and advance climate action. Such a holistic vision is warranted as it will help structure civil society (and industries') strategies and action plans towards clear objectives.

The report puts forward:

- A high-level overview of recent developments in EU and Turkish climate change policy
- A set of good practices and lessons learned from climate policy interaction and developments in the EU, which could be translated and applied in the context of Turkey
- A roadmap with clear steps that local Civil Society and stakeholders should take towards better articulating and furthering climate policy developments

The report builds on more than 15 consultations with civil society organizations¹ both from the EU and Turkey and multiple workshops² which were organized throughout the project and brought together community, academic, and industry perspectives.

In addition to these discussions, independent research and literature review was undertaken and knowledge outputs were produced as part of the project activities. The knowledge outputs are integrated in this report, as for example the study on 'EU Carbon Border Adjustment Mechanism Implications for the Turkish Economy' which can be found in Box 1.

To sum up, the report reflects on the main concerns and considerations identified during the dialogues, setting up the terrain for the recommendations and roadmap for CSOs. We hope that this publication will serve as a timely, relevant, and useful resource to support Turkey's civil society and strengthen the EU-Turkey CSO interaction.

About the 'EU – Turkey Climate Policy Dialogue'

The 'EU – Turkey Climate Policy Dialogue', which began in April 2021, is jointly implemented by the European Roundtable on Climate Change and Sustainable Transition (ERCST) and the İklim Araştırmaları Derneği (IAD) within the scope of the Grant Scheme for Supporting Civil Society Dialogue between EU and Turkey (CSD VI), which is funded by the European Union and coordinated by the Directorate for EU Affairs.

The 'EU – Turkey Climate Policy Dialogue' project

entails a multiplicity of activities and actions, including: building a network and facilitate the dialogue between EU and Turkish civil society organizations, stakeholder mapping of key EU and Turkish CSO's, one-on-one interviews with key EU and Turkish CSO's, knowledge outputs including research materials and presentations, communication and dissemination activities of project developments and development of roadmap for a sustained dialogue between EU and Turkish CSO's.

The main beneficiaries of this dialogue have been civil society organizations including NGO's, academia, development agencies, industry and regional associations, government and the different ministries involved in climate change policymaking, large and small medium enterprises (SMEs) as well as the broader society.



¹ Civil society organizations consulted: Cembureau, Eurometaux, FuelsEurope, TÜRKONFED, TUSIAD, Kadir Has University, YASED, Green Thought Association, GCCA+, IZKA, EBSO, WBCSD, ISO, WWF, Turkish Iron and Steel Association, Turkcimento, Istanbul Policy Center, Istanbul Technical University

² Workshops held:
 - July 6, 2021: EU-Turkey Climate Policy Dialogue: Opening Event
 - October 6, 2021: EU-Turkey Climate Policy Dialogue: Deep dive on CBAM, ETS and the Just Transition Mechanism
 - February 23, 2022: EU-Turkey Climate Policy Dialogue: Role of Civil Society in developing climate policies

2. EUROPE: AN OVERVIEW

The European Union (EU) is a political and economic union of 27 Member States which cover an area of 4,233,262 km² and has a population of 447.3 million (2020). Even though it is the second smallest continent in the world, it has a strong geopolitical and economic influence worldwide. In the last decade, the EU has been adopting ambitious climate related legislations across multiple policy areas, positioning itself as a global leader in the climate scene.

2.1. Economic Profile

EU is the largest trade bloc in the world with an internal single market which involves the free circulation of goods, capital, people, and services within the EU Member States. It is also the world's biggest exporter of manufactured goods and services.

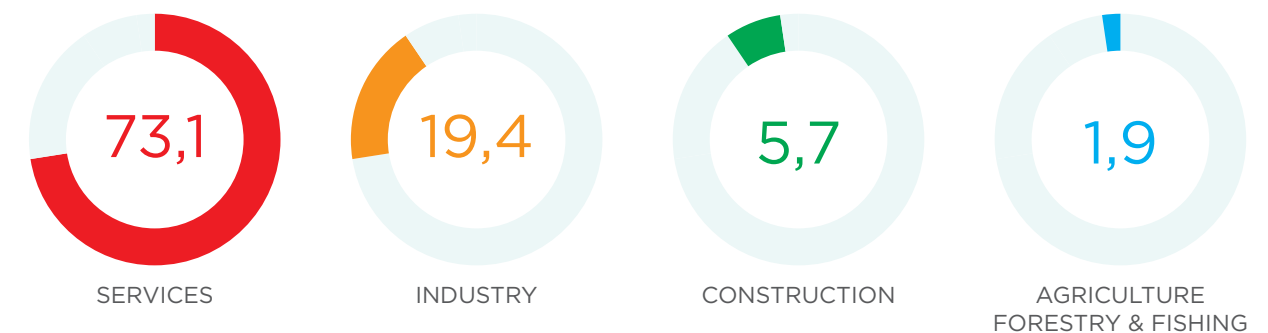
In 2020, the EU GDP was valued at EUR 13.306 billion. The economy was however heavily impacted by the COVID-19 crisis and GDP fell by 6.1 %. The pandemic has changed the EU and the wider world profoundly and is likely to have a lasting impact on a range of social, economic and environmental issues in the years to come.

On top of the COVID-19 pandemic, Europe is experiencing a turbulent start of 2022 due to the neighboring Russia-Ukraine war and the energy crisis, which effects can be already felt with record high electricity prices in Europe. According to Eurostat, the energy annual inflation in January 2022 was estimated at 27% and the annual inflation of consumer goods and services was up to 7.8% in March 2022, heavily impacting both businesses and households. This impact results from multiple causes including the war, the response to COVID-19 and spending for the transition.

On the trade front, in 2020, the EU exported goods to non-member countries that were valued at EUR 1.932 billion. As a result, the EU recorded its ninth successive annual trade surplus for goods. The COVID-19 crisis impacted on the value of the trade in goods in 2020: exports were 9.4 % lower than in 2019.

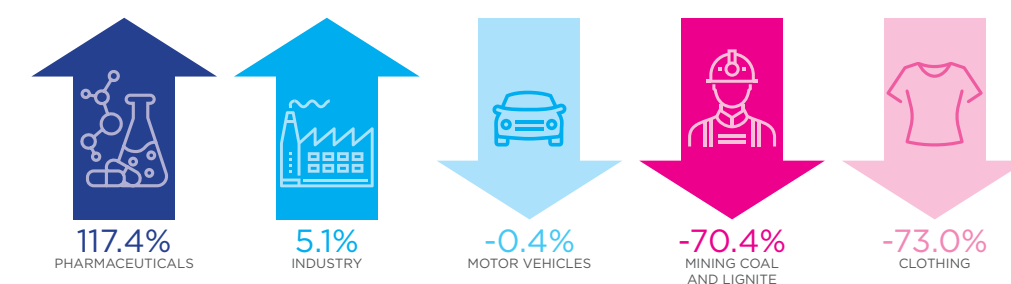
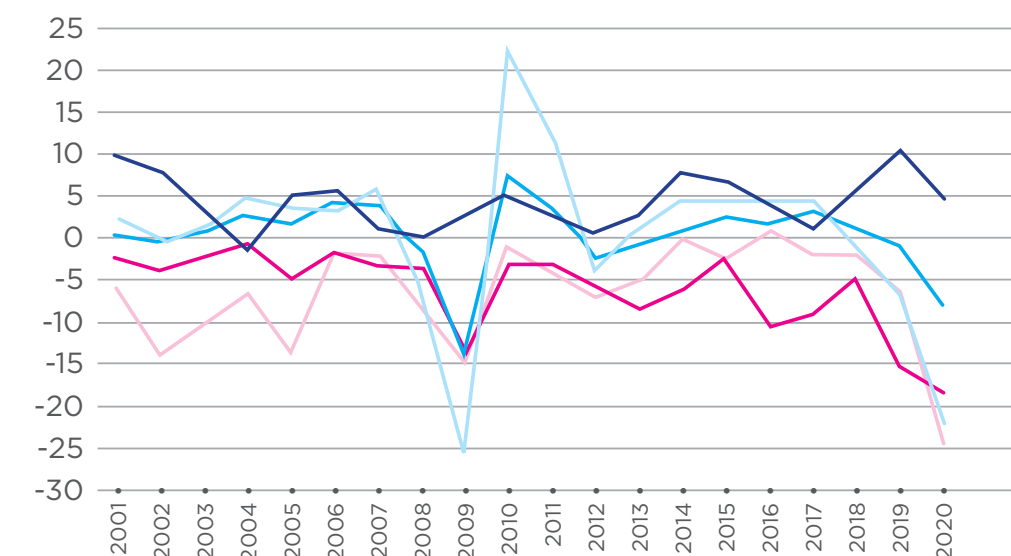
Between 2000 and 2020, the share of EU total value added that was generated within the services sector and it rose from 69.2 % to 73.1 %, mainly due to increases in the output of professional, scientific, and technical activities.

Figure 1. Share of EU total value added by sector in 2020



Source: Eurostat (2020)

Figure 2. EU Industrial output (% change compared with the year before, EU, 2001-2020)



Source: Eurostat (2020)

3 https://european-union.europa.eu/principles-countries-history/country-profiles_en

4 All the data in Section 2 refers to Eurostat data, the official statistical office of the European Union

2.2. Institutional and Political Profile

The European Union operates through a hybrid system of supranational and intergovernmental decision-making. The institutions of the European Union are the seven principal decision-making bodies of the European Union (EU). These are, as listed in Article 13 of the Treaty on European Union as listed below:

Table 1. Overview of the nature and functions of the Institutions of the EU



European Council

Provides impetus and direction

Based in Brussels

Sets the general political directions and priorities of the Union by gathering together its member states' heads. The conclusions of its summits (held at least quarterly) are adopted by consensus.



Council of the European Union

Legislative

Based in Brussels

Meets in Luxembourg for the months of April, June and October

Brings together ministers of member states governments' departments. It serves to represent the various governments directly and its approval is required for any proposal to enter into law.



European Parliament

Legislative

Meets in Strasbourg and Brussels Secretariat based in Luxembourg

Consists of 705 directly elected representatives. It shares with the Council of the EU equal legislative powers to amend, approve, or reject Commission proposals for most areas of the EU legislations. Its powers are limited in areas where member states view sovereignty to be of primary concern.



European Commission

Executive

Based in Brussel

Various departments and services hosted in Luxembourg

The only institution empowered to propose a legislation. It consists of an executive cabinet of public officials, led by an indirectly elected President. It turns the consensus objectives of the European Council into legislative proposals.



Court of Justice of the European Union

Judicial

Based in Luxembourg

Ensures the uniform application and interpretation of the European law. Has the power to decide legal disputes between member states, the institutions, businesses, and individuals.



European Central Bank

Central Bank

Based in Frankfurt

Determines the monetary policy of the eurozone ensures price stability in the eurozone by controlling the money supply.



European Court of Auditors

Auditory

Based in Luxembourg

Checks the proper implementation of the EU budget.

In the EU decision-making process, the European Council provides impetus and direction as to where Europe should be heading towards. It is then Council of the European Union and the European Parliament that have competence in scrutinizing and amending legislation, while executive tasks are performed by the European Commission.

There are also a number of ancillary bodies which advise the EU or operate in a specific area such as the Economic and Social Committee (EESC) or the Committee of the Regions (CoR) which are pivotal for civil society. Both bodies, must be consulted by the Commission, the Parliament, and the Council where the Treaty so provides (generally for policies related to their respective spheres of interest).

The EESC is a consultative body set up to represent the interests of the various economic and social groups in EU countries. Employers, trade unions and various economic and social interest actors (i.e., farmers, small businesses, professions, consumers, cooperatives, families, environmental groups).

Citizens and civil society in Europe play a particularly important role in the European legislative processes as they can provide inputs, feedback, and influence the different stages of the policy-making process. In addition, lobbying at EU level by special interest groups is regulated to try to balance the aspirations of the private sectors with public interest. In Section 5.3, a more in-depth analysis of the channels for articulating into the different climate policy processes for civil society will be provided.

Figure 3. Organigram of the EU political system



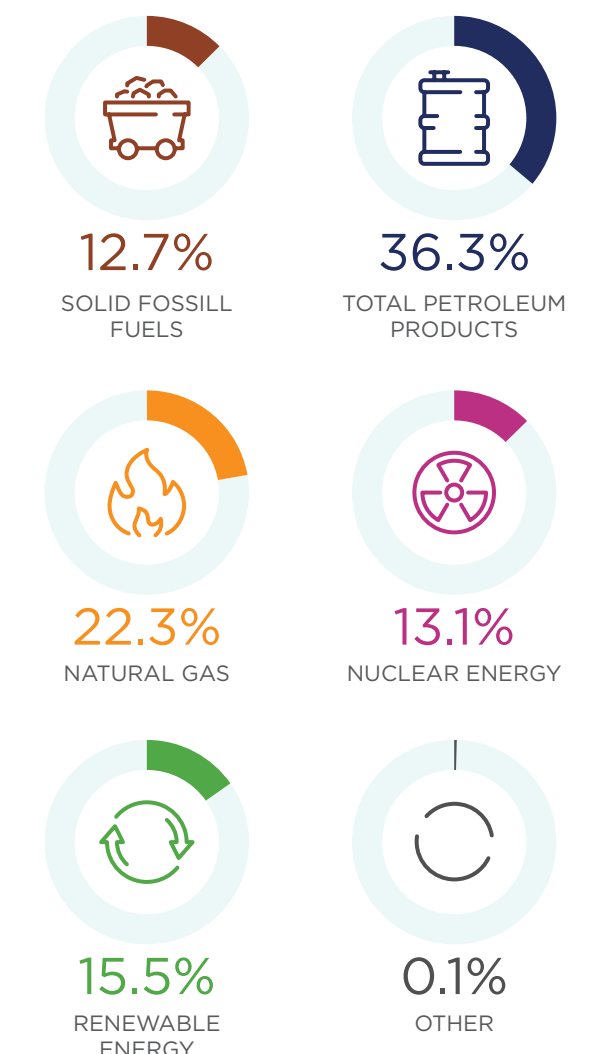
Source: University of Portsmouth

2.3. Energy and Environment

The energy consumed the European Union has a significant import component. In 2019, the EU's dependency rate was 60.7 %, in other words, net imports accounted for three fifths of gross inland energy consumption.

In 2019, the EU's final energy consumption was 935 million toe. The energy mix in the EU, was mainly made up by five different sources: petroleum products (including crude oil) (36 %), natural gas (22 %), renewable energy (15 %), nuclear energy and solid fossil fuels (both 13 %).

Figure 4. EU Energy Mix



Source: Eurostat (2019)

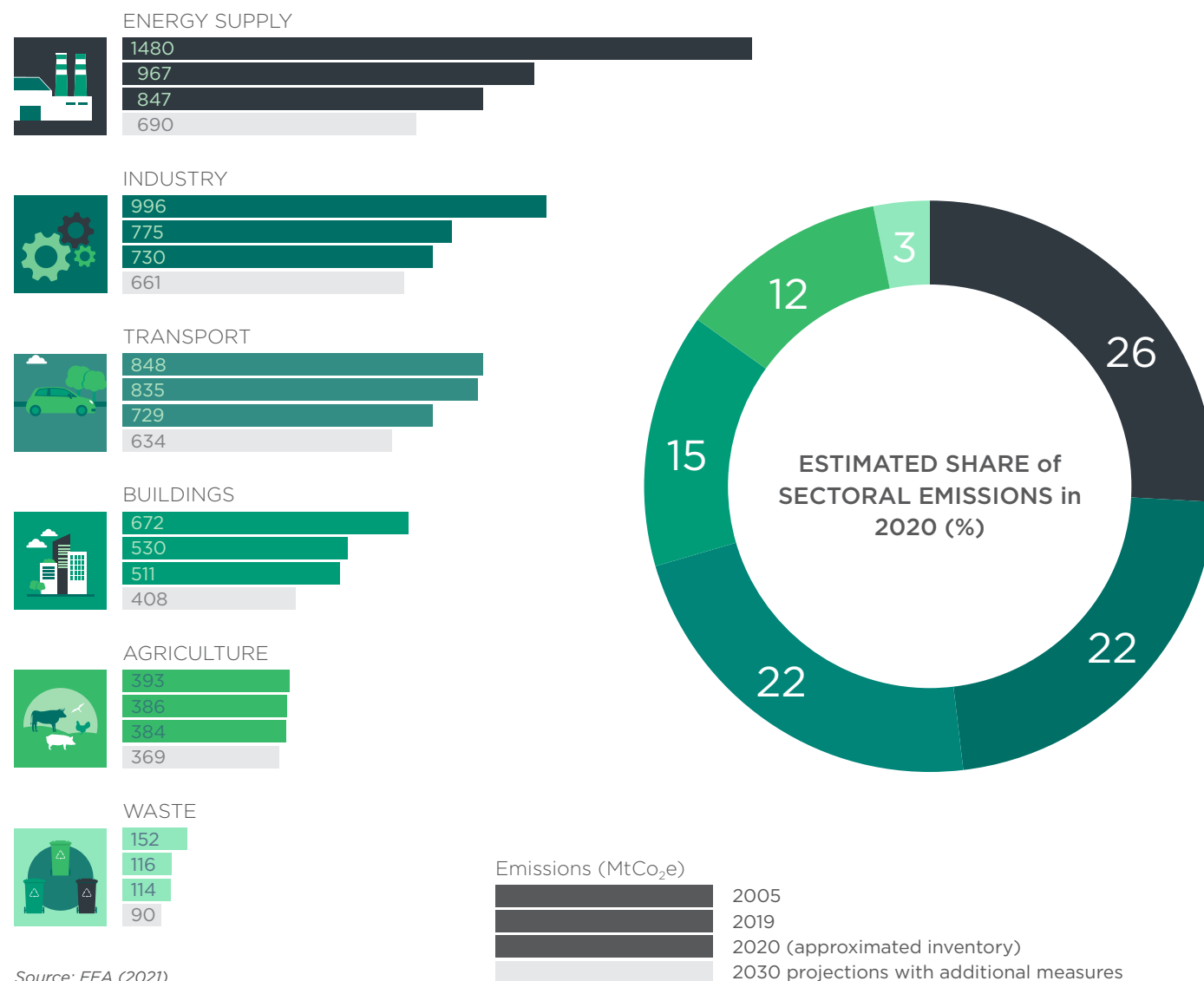
The combination of increasingly expensive wholesale gas, the energy transition and climate change policies, a strong rebound in global demand, geopolitical instability, and war, have pushed electricity prices in Europe to record heights, heavily impacting both businesses and households.

Through REPowerEU the Commission intends to phase out its dependence on fossil fuels from Russia and increase the resilience of its energy system, which is an opportunity to foster the clean energy transition.

In 2020, the EU27 GHG emissions fell by almost 10% compared to 2019, an unprecedented drop in emissions due to the COVID-19 pandemic, which brought overall emission reductions to 31% compared to 1990. This means that the EU has substantially exceeded its target under the UNFCCC Kyoto Protocol of reducing emissions by 20% by 2020 compared to 1990.

In terms of emissions by sector, in 2020, the greatest sectoral share of emissions occurred in the energy supply sector, 26% (power and heat production, oil and gas extraction and refining and coal mining). The transport sector was the second largest source of emissions with 22% of total EU emissions. One fifth of the total emissions were attributed to industrial activities. These emissions aggregate both the energy needs of various industries (manufacturing, construction, cement production, etc.) and their process-related emissions. Direct emissions from the buildings sector accounted for 15 % of the EU's total emissions and agriculture accounted for about 12 %. The waste sector accounted for only 3 % of GHG emissions in 2020 and is included in national emissions targets under the Effort Sharing legislation. The LULUCF sector is a net sink at EU level, but the sink was reduced by about one fifth between 2005 and 2020.

Figure 5. Sectoral trends and progress towards achieving the 2020 and 2030 targets in the EU-27



2.4.Climate Policy Landscape

The EU has adopted ambitious legislation across multiple policy areas to implement its international commitments on climate change. The EU is at the forefront of the global fight against climate change.

European policymaking is inherently multidimensional: on one hand, it has to encompass a broad framework providing objectives for the EU as a whole, while on the other it needs to acknowledge the often-specific needs of national and subnational territories.

This section provides an overview of the main EU climate policy developments that have set the path for building a climate-neutral, industrial, prosperous, green, fair and social Europe and that has cross-border influence, including in Turkey. The EU needs to decarbonize not deindustrialize. The selected policies have also been identified as priority for Turkish CSO's during the one-on-one interviews.

The European Green Deal and ongoing legislative climate policy initiatives under the EGD

1. The European Climate Law
2. Fit for 55 Package
3. EU Carbon Border Adjustment Measure (CBAM)
4. The revision of the EU Emission Trading System (ETS)
5. The revision of the Energy Taxation Directive (ETD)
6. The Just Transition Mechanism (JTM)
7. Circular Economy Action Plan (CEAP)
8. Farm to Fork Strategy
9. The European Climate Pact

Other relevant EU policies

10. EU Hydrogen Strategy
11. The Sustainable Finance Taxonomy
12. Carbon Removals Certification Mechanism (CRC-M)

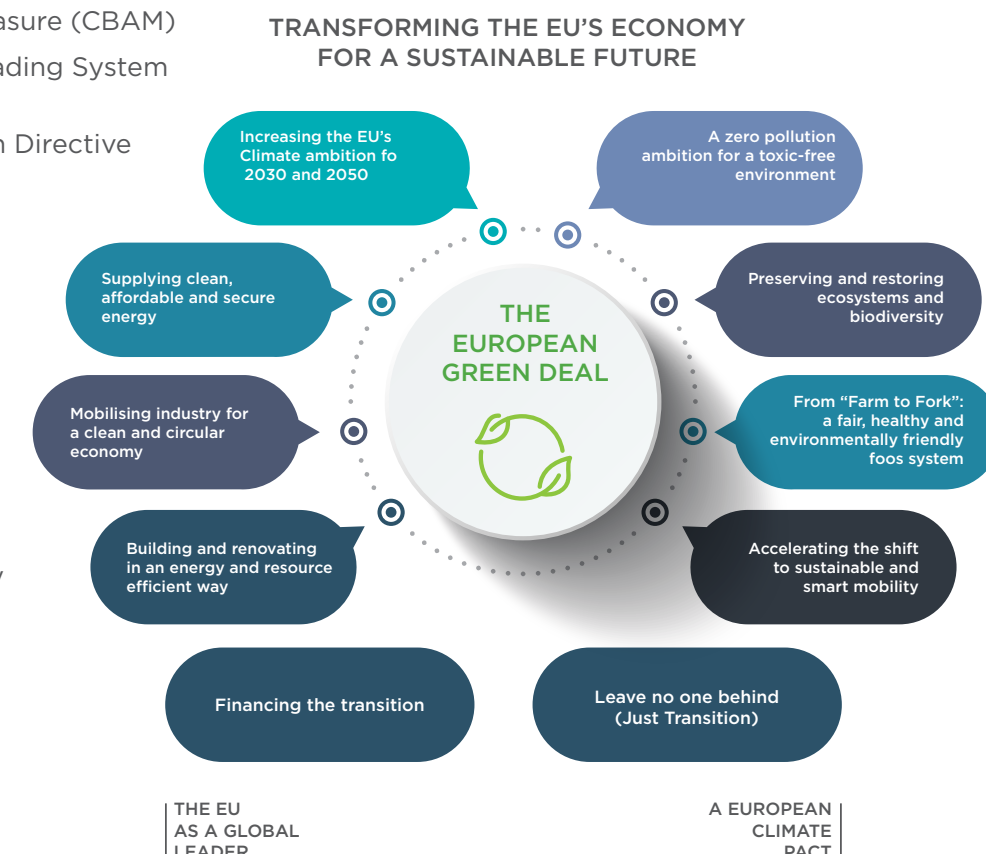
Source: European Commission (2019)

The European Green Deal and ongoing legislative climate policy initiatives under the EGD

When the European Green Deal was published, in December 2019, it brought a new impetus to climate policy and action at EU level. The EGD provides the blueprint and roadmap for the EU to reach the climate neutrality goal by 2050. It recognizes the need for all EU actions and policies to play a role in achieving climate neutrality, and it sets out a roadmap for legislative and non-legislative initiatives which will help the EU to attain this goal. These actions concern sectors such as industry, transport and mobility, energy, and finance.

Reaching these targets will require action from all regions and all sectors of the EU economy, including: investing in environmentally friendly technologies, supporting industry to innovate, rolling out cleaner, cheaper and healthier forms of private and public transport, decarbonising the energy sector, ensuring buildings are more energy efficient and working with international partners to improve global environmental standards.

Figure 6. Overview of the thematic priorities of the EGD



2.4.1. The European Climate Law

The European Climate Law establishes the goal set out in the European Green Deal (EGD) for Europe’s economy and society to become climate-neutral by 2050. The law also sets the intermediate target of reducing net GHG emissions by at least 55% by 2030, compared to 1990 levels.

2.4.2. Fit for 55 Package

The EU is working on the revision of its climate, energy and transport-related legislation under the so-called ‘Fit for 55 package’ in order to align current laws with the EU’s climate goals for 2030 and 2050. The package includes, among others:

- The revision of the EU Emissions Trading System (ETS)
- Efforts Sharing Regulation (ESR)
- Renewable Energy (RED) and Energy Efficiency (EED) Directives
- Land Use and Forestry Regulation (LULUCF)
- Energy Taxation Directive (ETD)
- CO2 emissions of cars and vans regulation

2.4.3. EU Carbon Border Adjustment Measure (CBAM)

The EU Carbon Border Adjustment Mechanism (CBAM) is a price on EU imports proportionate to the carbon content of goods imported from countries without EU ETS-level carbon pricing, in order to guard against carbon leakage. According to the European Commission’s proposal which was issued in July 2021, the mechanism would be phased in gradually and will initially apply to a selected number of goods such as iron and steel, cement, fertiliser, aluminium and electricity. A reporting system will apply as from 2023 and importers will start paying a financial adjustment from 2026.

In practice, the CBAM will mirror the ETS in the sense that the system is based on the purchase of certificates by importers. The price of the certificates will be calculated depending on the weekly average auction price of EU ETS allowances expressed in €/tonne of CO2 emitted. Importers of the goods will have to, either individually or through a representative, register with national authorities where they can also buy CBAM certificates. Where carbon pricing is in place in the country of origin, a reduction in the number of CBAM certificates to be surrendered can be claimed in proportion to the price paid.

The shape of the final regulation is under discussion with amendments still to be proposed and negotiated by the European Parliament and the European Council.

For non-EU countries with a high %age of energy-intensive exports to the European Union, this new mechanism is expected to lead to considerable adjustment costs.

Box 1.
EU Carbon Border Adjustment Mechanism and implications for Turkey: as EU’s 6th largest trading partner, Turkey to make strategic policy choices to manage the impact of CBAM

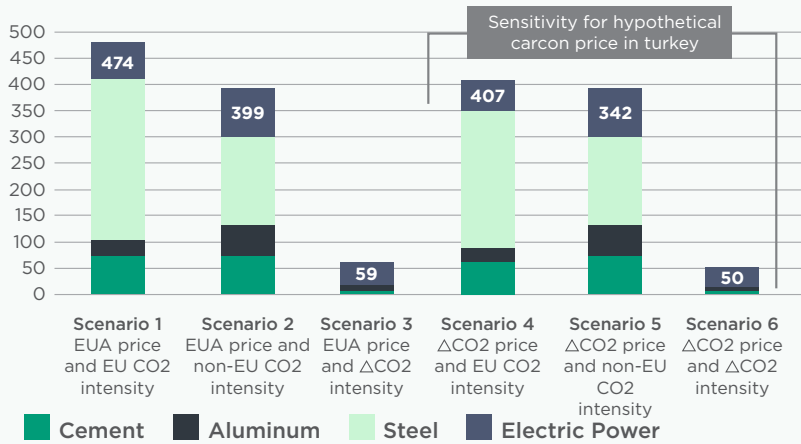
Turkish exporters of energy-intensive products such as cement, steel, aluminium and electricity could face steep additional costs when legislative proposals tabled by the EC under the EGD to introduce a CBAM come into effect.

The EC’s CBAM is a price on EU imports proportionate to the carbon content of goods imported from countries without adequate carbon pricing in order to guard against carbon leakage. The mechanism will be phased in gradually and will initially apply to a selected number of goods. A reporting system will apply as from 2023 and importers will start paying a financial adjustment in 2026.

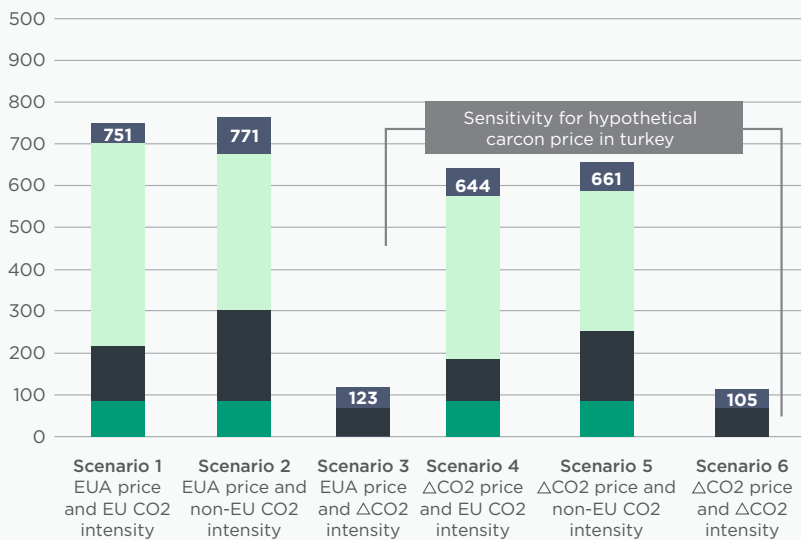
A study carried out by ERCST for the European Bank for Reconstruction and Development (EBRD) found that businesses in Turkey could be paying extra annual charges of €771 million, but that these would decrease to €399 million if only direct emissions are considered (Scenario 2).

Figure 7. CBAM payments for selected Turkish industry

CBAM payments (EUR million) in 2026, Scope 1 emissions



CBAM payments (EUR million) in 2026, Scope 1&2 emissions



Carbon price assumptions

- All scenarios: price of EU ETS allowances of EUR 70/t CO2 in 2026
- Scenarios 4-6: hypothetical carbon price in Turkey of EUR 10/t CO2 in 2026

Source: ERCST (2022)

Sources: ERCST, Implications of EU Carbon Border Adjustment Mechanism for Turkey, Final project presentation (2021), http://bestanden.turkishcarbonmarket.com/20210728_Turkey_CBAM%20final%20results_v1.pdf; EBRD, Turkish exporters could face steep extra costs under new EU carbon rules (2021) <https://www.ebrd.com/news/2021/turkish-exporters-could-face-steep-extra-costs-under-new-eu-carbon-rules.html>

While uncertainties remain as to how far down the value chain product coverage would go, the assessment found that CBAM payments could represent a significant share of current prices for some products, for instance up to about 50% for cement, 18% for aluminium and 9% for steel. In total, CBAM payments would represent 0.07% of Turkey’s GDP forecast in 2026, provided the EC proposal enters into force at the beginning of that year.

The charge levied at the border is among other things expected to encourage EU trading partners to adopt carbon-pricing systems comparable to the EU ETS to accelerate decarbonisation in line with the Paris Agreement. Under the proposed rules, foreign producers would be credited for any explicit carbon price paid in their home jurisdiction, thereby reducing total payments. Turkey already has a measurement, reporting and verification system that is similar to the one of the EU ETS and could consider introducing a national emissions trading scheme.

2.4.4. The revision of the EU Emission Trading System (ETS)

Established in 2005, the EU ETS, is the world's first and largest carbon market or cap-and-trade system. Caps, which are reduced annually, limit GHG emissions permitted from over 11,000 power stations, industrial plants (including the production of aluminum, cement, and iron and steel, among others), and airlines, accounting for over 45% of the EU's GHG emissions. Companies receive or purchase tradable emission allowances. At year's end, they must cover their total emissions with their allowances or face steep fines and can either sell excess allowances or reserve them for future use.

As part of the Fit for 55 Package, the Commission set out a new target for the sectors covered by the EU ETS: reducing emissions by 61% (vs 2005 levels) by 2030, compared to the previous target of 43%. To achieve this new target, a tightening of current ETS parameters is envisioned, including a lowering of the cap and a reduction in the provision of free allowances. In addition to these measures, the Commission has proposed the inclusion of CO₂ emissions from the maritime sector, and the so-called "ETS 2", which would introduce an ETS for road transport and buildings starting in 2026.

2.4.5. The revision of the Energy Taxation Directive (ETD)

The ETD establishes the framework conditions of the EU for the taxation of electricity, motor and aviation fuels and most heating fuels. It also sets out the EU-wide minimum tax amounts for these sectors. Member States can apply higher taxation over this minimum. The main objectives of revising the

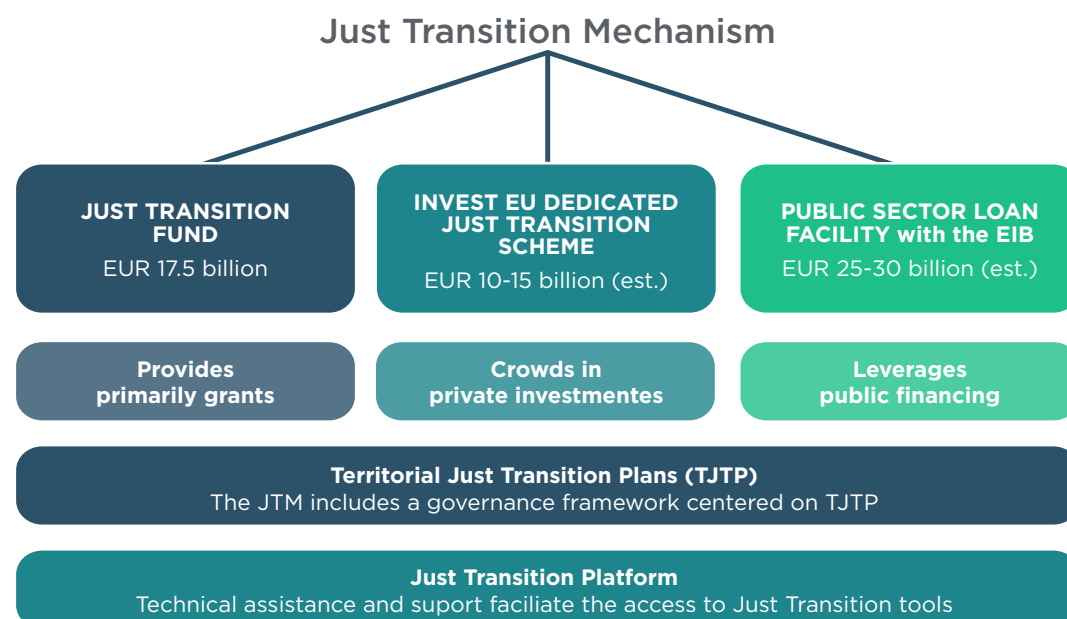
Directive are: a) align taxation of energy products and electricity with EU energy and climate policies to contribute to the EU 2030 energy targets and climate neutrality by 2050; b) preserve the EU single market by updating the scope and the structure of tax rates and rationalise the use of optional tax exemptions and reductions. The Commission is currently proposing to increase the minimum tax rates and to eliminate current targeted exemptions.

2.4.6. The Just Transition Mechanism (JTM)

The JTM is a key tool of the EGD aimed at ensuring that the transition towards a climate-neutral economy happens in a fair way, leaving no one behind. The mechanism will mobilise around €55 billion over the period 2021-2027 in the most affected regions. It provides targeted support for regions dependent on fossil fuels (coal, lignite, peat, oil shale) as well as carbon-intensive industries which will have to undergo a deep transformation in the following years. It's a financial triptyque combining instruments such as grants and loans under the Just Transition Fund (JTF), InvestEU "Just Transition" scheme and the Public Sector Loan Facility.

Currently under the JTF, Member States are preparing their Territorial Just Transition Plans (TJTJs). Preparation of the TJTJs is a key condition for programming and subsequently accessing resources from the JTF. Each TJTJ should describe the transition process at the national level towards a climate-neutral economy, including a timeline for key transition steps.

Figure 8. Just Transition Mechanism Framework



Source: ERCST on the base of EC Framework (2022)

2.4.7. Circular Economy Action Plan (CEAP)

The European Commission adopted the New Circular Economy Action Plan (CEAP) in March 2020. The new action plan announces initiatives along the entire life cycle of products, and it introduces both legislative and non-legislative measures. It targets how products are designed, promotes circular economy processes, encourages sustainable consumption, and aims to ensure that waste is prevented and the resources used are kept in the EU economy for as long as possible.

The newly proposed measures inside the package are: the Sustainable Products Initiative (SPI) which includes the proposal for the Ecodesign for Sustainable Products Regulation, the EU strategy for sustainable and circular textiles, the proposal for a revised Construction products Regulation and the proposal for empowering consumers in the green transition.

2.4.8. Farm to Fork Strategy

A proposal for a legislative framework for sustainable food systems be put forward to support implementation of the strategy and development of sustainable food policy. Taking stock of learning from the COVID-19 pandemic, the Commission will also develop a contingency plan for ensuring food supply and food security. The EU will support the global transition to sustainable agri-food systems through its trade policies and international cooperation instruments.

Figure 9. Main components of Farm to Fork Strategy



Source: European Commission (2022)

2.4.9. The European Climate Pact

The EU Climate Pact is an EU-wide initiative inviting people, communities, and organizations to participate in climate action and build a greener Europe. It invites people to learn about climate change, develop and implement solutions for key topics such as green areas, transport, buildings and developing skills.

Other relevant EU policies

2.4.10. EU Hydrogen Strategy

On July 2020, the EC launched its long-awaited Hydrogen Strategy with the objective of boosting clean Hydrogen production in Europe while emphasizing the multifaceted nature of this technology and its multiple applications, as a feedstock, a fuel, an energy carrier and as a storage solution. As a cornerstone of the Strategy the European Commission proposed ambitious renewable hydrogen targets for 2024, 2030 and 2050 to create a Hydrogen based ecosystem.

The legislative implementation of the vision outlined in the strategy has progressively taken shape. The Fit for 55 package has laid the foundations of a regulatory framework for hydrogen through different pieces of legislation, such as the revision of the Renewable Energy Directive or the Hydrogen and Gas package where different definitions, targets, rules and standards have been introduced in support of clean hydrogen. On March 8th, 2022, following the invasion of Ukraine by Russia, the European Commission published a communication entitled Repower EU, placing renewable hydrogen at the core of the Commission's strategy to speed up decarbonization, increase security of supply and reduce dependency from Russian's gas. The communication refers to 20 million tons of imported and EU produced hydrogen for 2030.

2.4.11. The Sustainable Finance Taxonomy

The EU taxonomy regulation, which was adopted in 2020, is a classification system establishing a list of economic activities which substantially contribute to six EU's environmental objectives.

It is presented as a tool setting a common language between investors, issuers, project promoters and policy makers to assess whether investments are meeting robust environmental standards and are consistent with high-level policy commitments. From 2021, large and listed companies have an obligation to report if their activities are covered by the taxonomy. From 2022, they will have to report to what extent they align with the criteria set by the taxonomy. Taxonomy issues, spill over to other EU policies. For instance, currently the EU institutions negotiate the EU Green Bond Standards based on taxonomy criteria.

2.4.12. Carbon Removals Certification Mechanism (CRC-M)

In February 2022 the Commission opened a stakeholder consultation devising a framework accounting for the removal of carbon emissions. This initiative will develop the necessary rules to monitor, report and verify the authenticity of these removals. The aim is to expand sustainable carbon removals and encourage the use of innovative solutions to capture, recycle and store CO₂ by farmers, foresters, and industries.

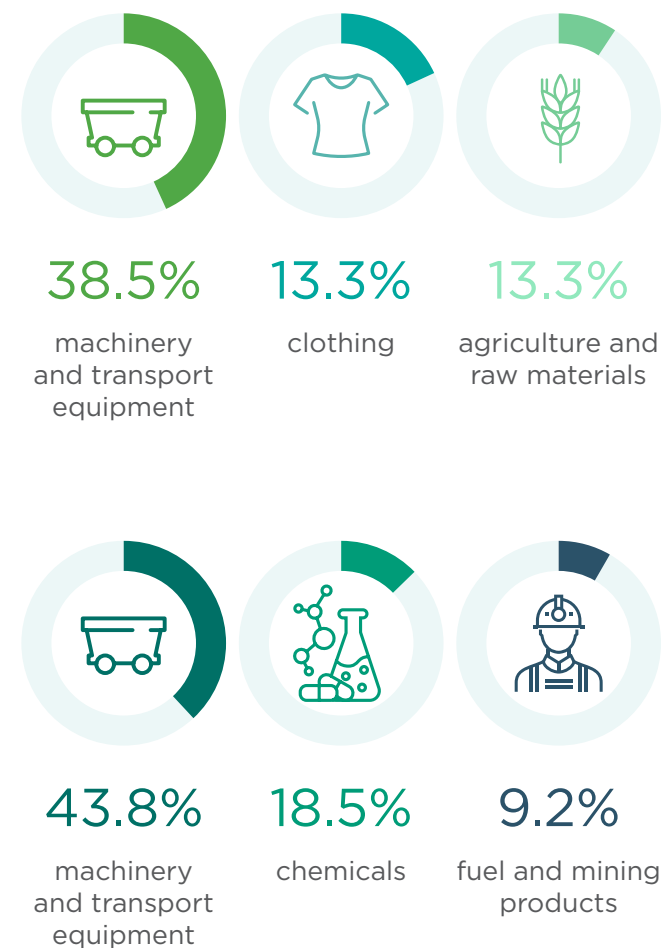
2.5. Cooperation and trade between the EU and Turkey: aligning with the EU acquis

The EU-Turkey trade relations are based on an Association Agreement from 1963 and a Customs Union Agreement, which entered into force on 31 December 1995. Turkey has been a candidate country to join the European Union since 1999. Accession negotiations started in 2005, but have not advanced recently.

Regardless of the fact that Turkey's accession negotiations have effectively come to a standstill, **Turkey has continued to align with the EU acquis especially in the climate front**, triggered by EU policies such as the EGD and the CBAM. Also recalling the fact that Turkey remains a key partner for the European Union in essential areas of joint interest, such as migration, economy, trade, energy and transport.

Regarding trade, **Turkey is the EU's 6th biggest trade partner, representing 3.6% of the EU's total trade in goods** with the world in 2020. The EU is by far Turkey's largest import and export partner, as well as its main source of investments. In 2020, 33.4% of Turkey's imports came from the EU and 41.3% of the country's exports went to the EU.

Total trade in goods between the EU and Turkey in 2020 amounted to €132.4 billion. The EU's imports from Turkey were worth €62.6 billion and were led by machinery and transport equipment (€24.1 billion, 38.5%), clothing (€8.3 billion, 13.3%), and agriculture and raw materials (€5.3 billion, 8.5%). The EU's exports to Turkey totaled €69.9 billion. They were dominated by machinery and transport equipment (€30.6 billion, 43.8%), chemicals (€12.9, 18.5%) and fuel and mining products (€6.4 billion, 9.2%).



3. TURKEY: AN OVERVIEW

Turkey is an Eurasian country with territory on two continents. It covers an area of 783,562 km² with its lands consisting of 7 different geographical regions and has a population of 84.6 million (2021).

Turkey is one of the main partners of the EU and relations with Europe have always been a central part of Turkish foreign policy. The country, which became a member of the Council of Europe in 1949, established a partnership relationship with the European Economic Community (later transformed into the European Union) in 1963. It became an associate member of the Western European Union in 1992, joined the EU Customs Union in 1995 and started full membership negotiations with the European Union in 2005. Although the accession negotiations have come to a standstill as of 2018, compliance with EU policies, today, especially in the fields of environment, energy and climate, is accepted as a strategic goal and state policy by Turkey.

3.1. Economic Profile

Growing at an annual rate of 4.4% in the first quarter of 2020, the Turkish economy contracted by 10.4% in the second quarter as a result of the negative impact of the COVID-19 pandemic on economic activities. The easing of restrictions due to the decrease in the number of cases as of the second half of the year enabled the revival of operating conditions and the GDP growth rate was 1.8 % throughout the year.

Led by the increase in private consumption expenditures, which contributed significantly to the 1.8 % growth recorded in the whole of 2020, total consumption expenditures increased by 3.0 %. In this period, total fixed capital investments increased by 7.2 %, while net exports of goods and services made a negative contribution to growth by 5.3 points. A significant decrease in tourism revenues as a result of the closure of borders between countries in order to reduce the spread of the epidemic and the contraction in foreign demand due to the epidemic played a role in this development.

In 2021, after the effects of the COVID-19 pandemic on the global economy and trade diminished, there was a rapid recovery in international trade activities. The increase in foreign demand, especially as a result of the increase in the pace of economic activity in the main export markets, brought along a rapid increase in exports. In this context, exports

increased by 36.9 % in the January-August period of 2021 compared to the same period of the previous year and amounted to USD 140.2 billion. In the January-August period, imports, on the other hand, increased by 25.5 % compared to the same period of the previous year and reached USD 170 billion. In this period, there was a recovery in international tourism activities with the relative decrease in the restrictions taken within the scope of the epidemic. Travel revenues from the January-August period increased by 97.1 % and reached USD 10.5 billion.

GDP increased by 11.1% in 2021 compared to the previous year and was recorded as 7 trillion 209 billion 40 million Turkish Liras. In this period, value added decreased by 2.2 % in the agriculture sector, and increased by 16.6 % and 21.1 % in the industry and services (including construction) sectors, respectively.

Figure 10. GDP growth rates in 2020 and 2021

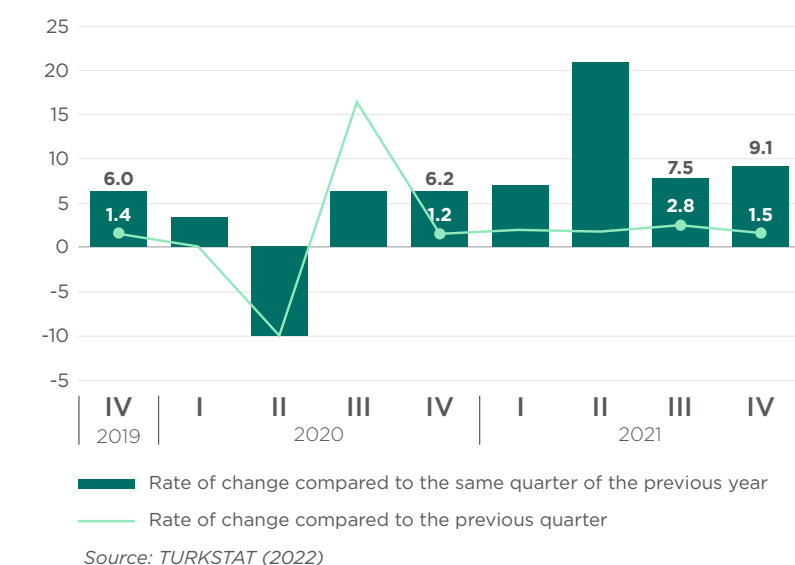
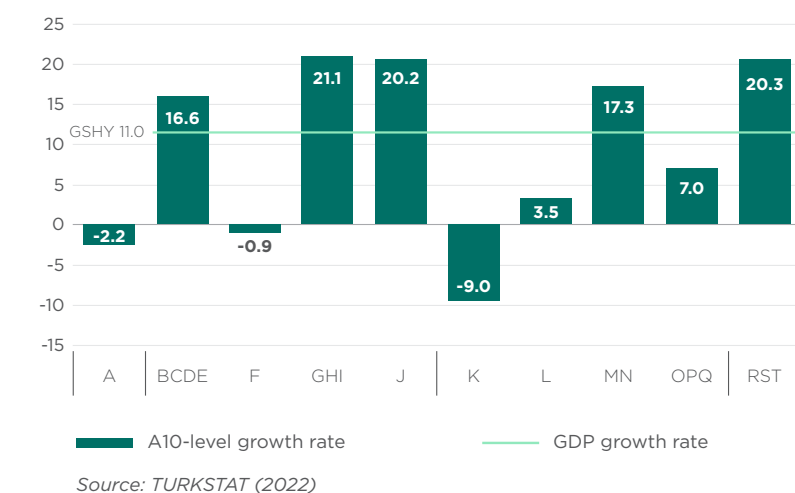


Figure 11. Share of Turkey's total value added by sectors in 2021



3.2. Institutional and Political Profile

Turkey is governed by the Presidential Government System, the legal infrastructure of which was established with the referendum held on April 16, 2017, and the de facto transition was made with the general elections on June 24, 2018.

The Turkish political system has a structure based on the principle of separation of powers. It is based on the principle of tripartite separation of powers, consisting of Legislative, Executive and Judicial powers.

Legislative

There is a unicameral legislature in Turkey. The Grand National Assembly of Turkey (GNAT) is a kind of participatory parliament and constitutional state body with the power to make, amend and repeal laws whose primary duty is to oversee the executive. It consists of 600 elected deputies.

What is the law-making process?

1. Submission of the bill to the Presidency of the Grand National Assembly of Turkey
2. Transfer of the proposal to the commissions and debating in the commissions
3. Debating of the Commission report in the Plenary
4. Publication and entry into force of the Law by the President

The parliamentary commissions, which form the basis of the law-making process and consist of a certain number of deputies, have important functions in legislative and auditing activities.

Subcommittees may be established within the relevant commission from time to time in order to examine the subject in more detail.

Commissions:

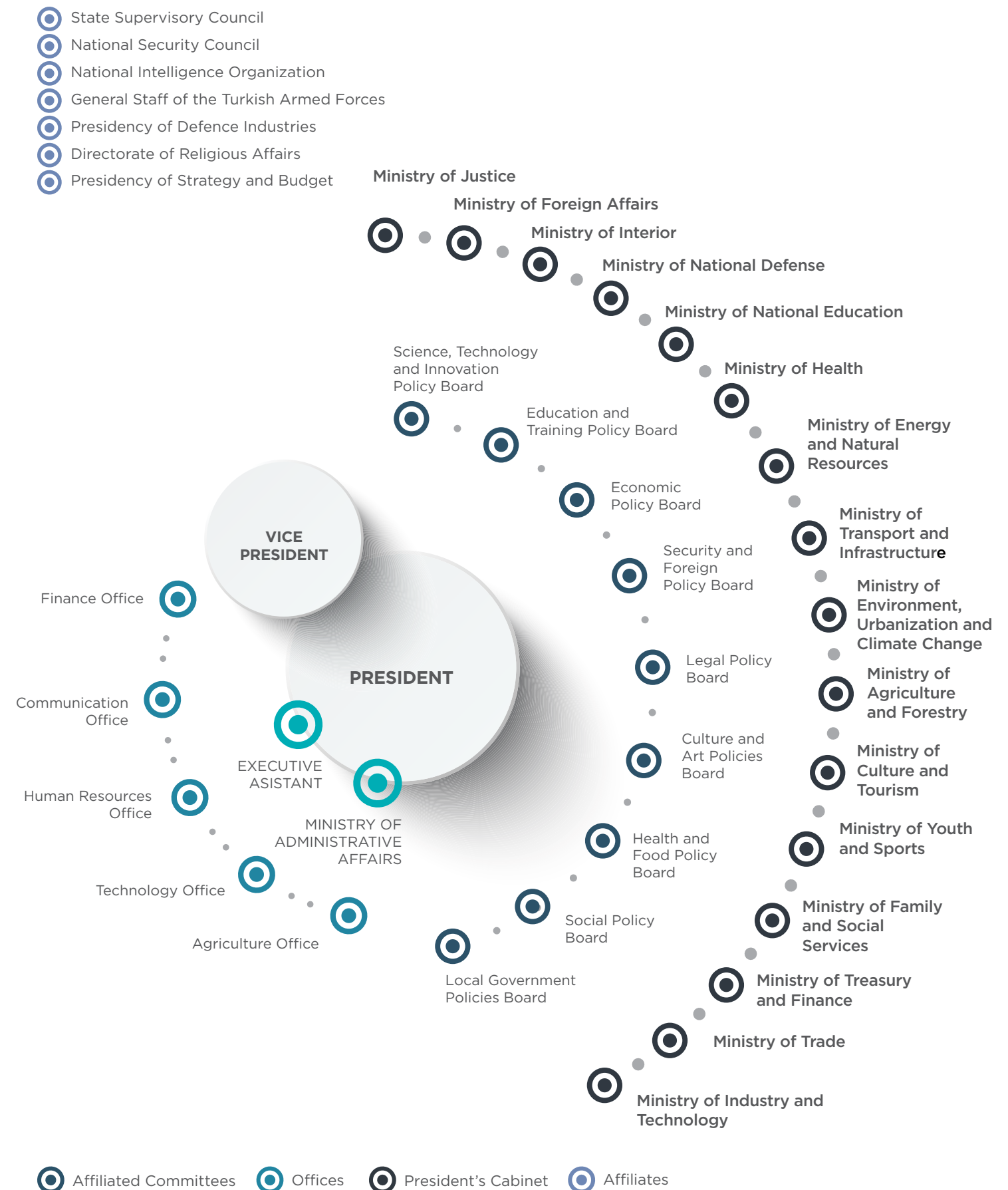
1. Constitutional Commission
2. Justice Commission
3. National Defense Commission
4. Internal Affairs Commission
5. Foreign Affairs Commission
6. National Education, Culture, Youth and Sports Commission
7. Public Works, Reconstruction, Transport and Tourism Commission
8. Environment Commission
9. Health, Family, Labor and Social Affairs Commission
10. Agriculture, Forestry and Rural Affairs Commission
11. Industry, Trade, Energy, Natural Resources, Information and Technology Commission
12. Petition Commission
13. Planning and Budget Committee
14. State Economic Enterprises Commission
15. Human Rights Investigation Commission
16. European Union Harmonization Commission
17. Commission on Equal Opportunities for Men and Women
18. Security and Intelligence Commission

Executive

Turkey, which is governed by the republican regime, the President is the head of state. In this capacity, it represents the Republic of Turkey and the unity of the Turkish Nation. It ensures the implementation of the Constitution and the regular and harmonious functioning of the State organs.

The central government structure in the presidential government system consists of four structures: offices, policy boards, ministries and affiliates. The political administrative structure of the Republic of Turkey created in this context is shown in Figure below.

Figure 12. Presidential Organization of the Republic of Turkey



The President cannot propose laws other than the budget law proposal. However, it may issue presidential decrees on matters related to executive power. In the new system, where the executive power is single-headed, the public policy boards formed based on the President's authority to issue decrees are as follows:

- Local Government Policies Board
- Social Policy Board
- Health and Food Policy Board
- Culture and Art Policies Board
- Legal Policy Board
- Security and Foreign Policy Board
- Economic Policy Board
- Education and Training Policies Board
- Science Technology and Innovation Policy Board

The general duties and powers of the boards are as follows:

- To develop proposals regarding the decisions to be taken by the President and the policies to be formed
- To carry out the necessary studies on the policy and strategy proposals that have been developed, which are deemed appropriate by the President
- Developing strategy and policy proposals against sudden changes brought about by global competition
- To give opinions to public institutions and organizations on matters falling within their scope of duty
- To monitor the policies and developments implemented by taking the opinions of ministries, institutions and organizations, civil society and sector representatives, experts in their fields and other relevant persons, and to present a report to the President regarding the work done
- To hold extended board meetings by inviting ministries, institutions and organizations, representatives of civil society and industry, experts in their fields and other relevant persons.

In addition to the policy boards, which have duties and powers regarding the decisions to be taken directly by the President and the policies to be formed, there are also public institutions and organizations that play an active role in this process. These institutions and organizations are directly subordinate to the Presidency with the aim of developing policies on matters falling under their mandate:

- Presidency of State Archives
- State Supervisory Board
- Presidency of Religious Affairs
- Directorate of Communications
- General Secretariat of the National Security Council
- Presidency of the National Intelligence Organization
- Directorate of National Palaces Administration
- The Presidency of Defence Industries
- Strategy and Budget Department
- Turkey Wealth Fund

Among these institutions, the Strategy and Budget Presidency has important duties and powers, in order to accelerate Turkey's economic and social development and to make the development balanced and sustainable, such as development of sectoral and thematic policies and strategies, especially the preparation of basic policy documents, preparation and implementation of the central government budget, plan, program, resource allocation, budget, policy and coordination of the implementation of strategies.

The ministries, which are another and important part of the executive power, are responsible for developing, implementing and monitoring the implementation of policies and strategies at the national level on matters falling under their mandate. There are 17 Ministries that are jointly responsible for the conduct of Turkish politics and are directly subordinate to the President:

1. Ministry of Justice
2. Ministry of Family and Social Services
3. Ministry of Labor and Social Security
4. Ministry of Environment, Urbanization and Climate Change
5. Ministry of Foreign Affairs
6. Ministry of Energy and Natural Resources
7. Ministry of Youth and Sports
8. Ministry of Treasury and Finance
9. Ministry of Interior
10. Ministry of Culture and Tourism
11. Ministry of National Education
12. Ministry of National Defense
13. Ministry of Health
14. Ministry of Industry and Technology
15. Ministry of Agriculture and Forestry
16. Ministry of Trade
17. Ministry of Transport and Infrastructure

Judgment

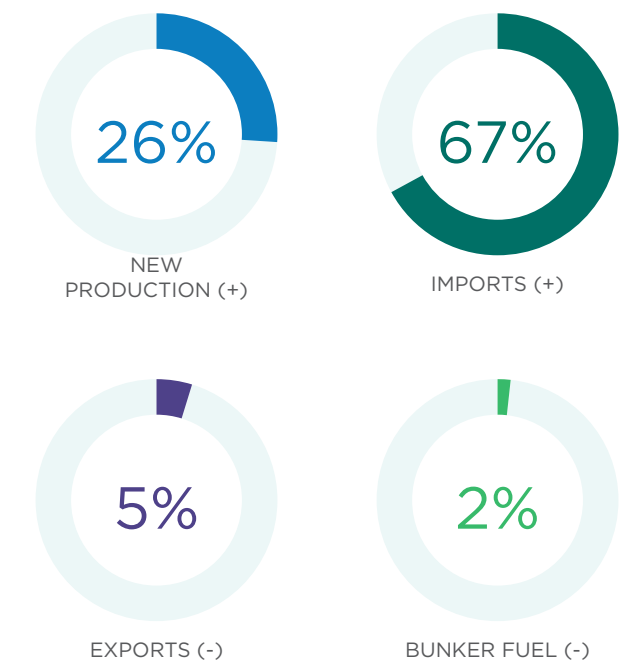
Judicial power in Turkey is exercised by independent and impartial courts and higher judicial bodies.

- The Constitutional Court is the supreme judicial body, and it is the last authority that oversees the conformity of laws with the Constitution and decides whether they are enacted or annulled.
- The Supreme Court is the judicial body. The highest court is the Supreme Court and is the final decision-making mechanism.
- The Council of State is the administrative judicial body. It is the authority where administrative cases are handled. The executive authority must comply with its decisions.
- The Court of Accounts is the financial judicial body. It is responsible for auditing the accounting system of all public institutions, organizations and economic enterprises.

3.3. Energy and Environment

According to the National Energy Balance data, the total energy supply in 2020 was 147,168 toe, 26% of which was provided from local production resources as shown in the figure below.

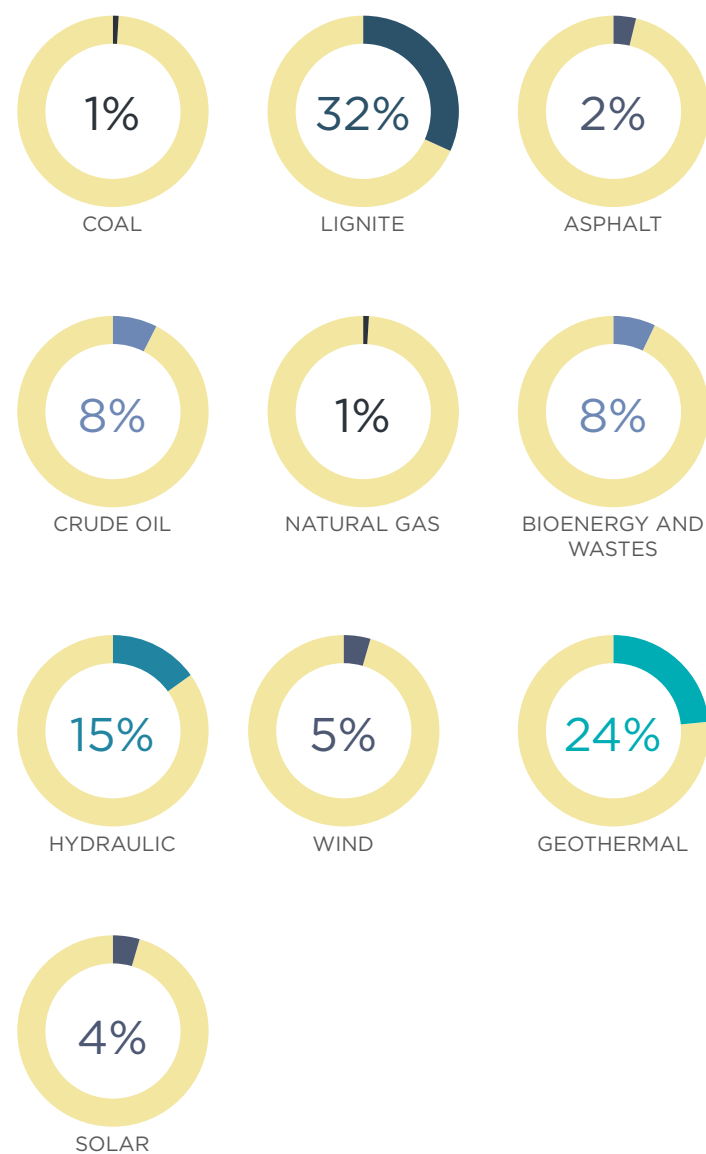
Figure 13. Turkey Energy Supply Distribution in 2020 in thousands toe



Source: General Directorate of Energy Affairs (2021)

When local energy production is analyzed on the basis of resources, it can be noted that 44% of the production is obtained from fossil resources and 56% from renewable resources in 2020. When the energy produced from renewable sources is analyzed, it can be noted that wind, hydraulic, geothermal, solar and other heat sources come first.

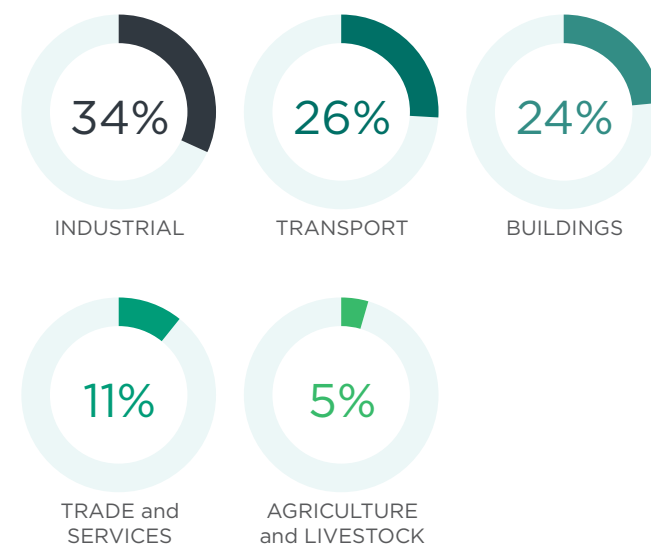
Figure 14. Turkey Local Energy Production by Source in 2020 in thousands toe



Source: General Directorate of Energy Affairs (2021)

The total energy consumption for the same year was 113,701 toe. When the consumption is evaluated on a sectoral basis, it is observed that energy consumption from industry comes first, followed by the transportation and housing sectors.

Figure 15. Final Energy Consumption by Sectors in Turkey in 2020 in thousands toe



Source: General Directorate of Energy Affairs (2021)

In recent years, energy investments have been made, especially for renewable resources, in order to increase the diversity of energy supply. With the entry into force of the Energy Efficiency Law in 2007, projects related to energy efficiency and supporting energy efficiency have become widespread. With the Energy Efficiency Action Plan published in January 2018, it is ensured that energy efficiency practices are widespread in many sub-sectors.

According to TurkStat's Greenhouse Gas Emission Statistics, total greenhouse gas emissions in 2020 have been 523.9 million tons (Mt) CO₂e. In 2020 emissions, energy-related emissions have the largest share as CO₂e with 70.1%, followed by agricultural activities with 13.9%, industrial processes and product use with 12.75%, and waste with 3.25%.

According to TurkStat's data, total greenhouse gas emissions in Turkey in 2020 as CO₂e increased by 138.4% compared to 1990 and 7.2% compared to 2019. It is thought that the most important reason for the increase is the rapid increase in energy consumption in parallel with the economic and industrial development of Turkey after 1990. Looking at the sectoral distribution of greenhouse gas emissions by years, it is seen that the increase in total emissions is mainly due to energy production and consumption. This is followed by emissions from industrial processes and product use, and emissions from agricultural activities and waste.

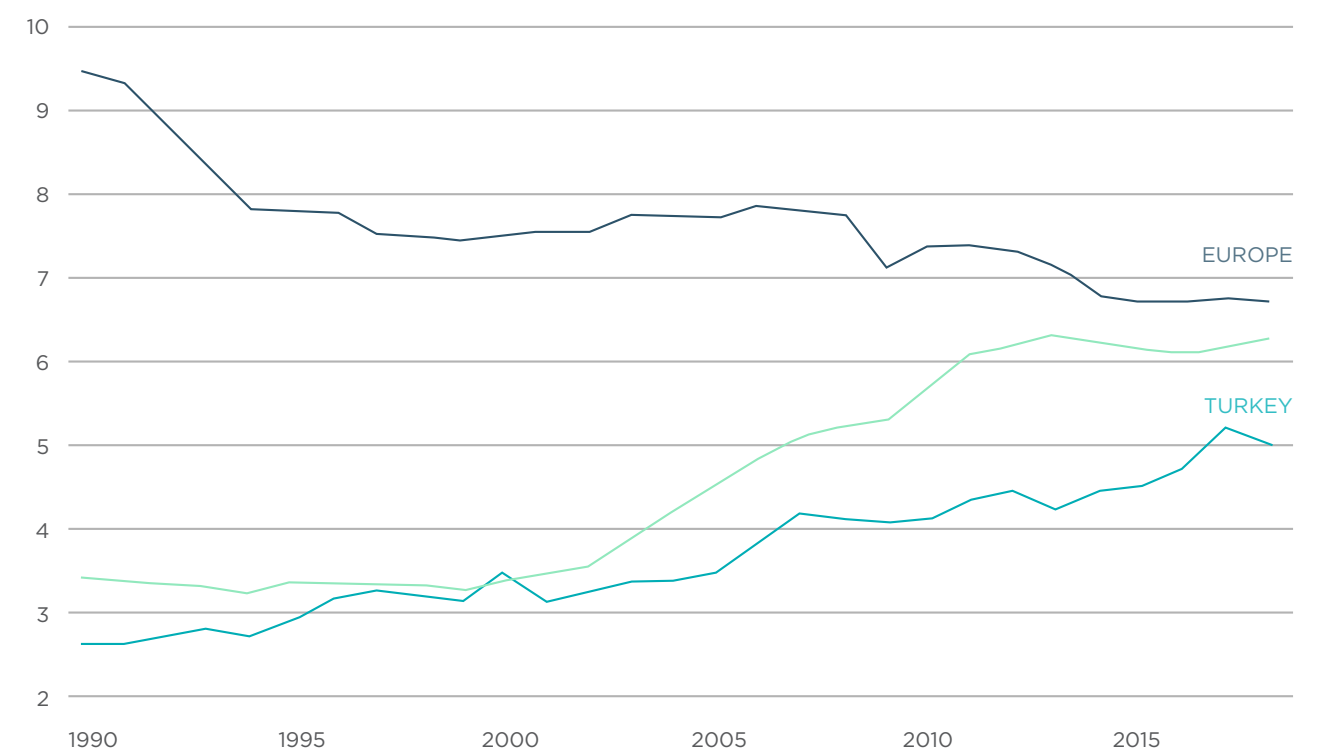
Figure 16. Total Greenhouse Gas Emissions by Sector in Turkey in million tons of CO₂e



Source: TurkStat (2020)

However, Turkey's share in global emissions remains low. When the per capita emission rates are analyzed, it is seen that the per capita emission of Turkey are below the OECD rates. Emissions from Turkey contribute 1.05% to global emissions.

Figure 17. CO₂ Emissions Per Capita



Source: World Bank (2020)

3.4. Climate Policy Landscape

As a result of the UNFCCC 21st Conference of the Parties (COP21) held in Paris in 2015, the Paris Agreement was signed by 195 countries, including Turkey. After Turkey's belated ratification of the Paris Agreement in October 2021 and its commitment to net zero emissions by 2053, developments regarding climate policies and climate targets have accelerated.

First of all, the name of the Ministry of Environment and Urbanization, which is the main authorized and responsible ministry in the fight against climate change in Turkey, was changed and updated as the "Ministry of Environment, Urbanization and Climate Change".

The Ministry, which carries out the national coordination task on issues related to climate change, is the National Focal Point responsible for the Secretariat of the United Nations Framework Convention on Climate Change. "National Climate Change Strategy Document 2010-2023", "Republic of Turkey Climate Change Action Plan 2011-2023 (IDEP)" and "Turkey's Climate Change Adaptation Strategy and Action Plan 2011-2023", which are the main strategy documents on climate change, have been prepared under the coordination of the Ministry. However, at this point, Turkey needs to be among the countries that want to reduce its emissions rapidly, and to invite countries that do not take strong steps, and to act together with countries with stronger targets such as the EU and the UK. A big step has been taken in these efforts when the Ministry and the United Nations Development Program (UNDP) announced that they would join forces to prepare a long-term "2050 Climate Change Strategy" and "2030 Action Plan" that would reflect Turkey's ambitious climate goals.

In addition, in the "Climate Council" organized by the Ministry of Environment, Urbanization and Climate Change for the preparation of the "Climate Law" and the "Regulation on the Emissions Trading System" and updating the "Intended Nationally Determined Contribution", A roadmap has been created in the field of Turkey's climate targets and policies by carrying out studies in various fields from greenhouse gas reduction to carbon pricing and emission trading system, from green financing to climate change adaptation policies, from our local governments to migration, just transition and social policies.

Key documents on Turkey's climate policies

3.4.1. National Climate Change Strategy (2010-2020)

The National Climate Change Strategy Document, which is the main policy document on climate change, was prepared with the participation of public institutions, private sector representatives, NGOs and universities and in an effective working process and was approved by the High Planning Council, which was the Prime Ministry State Planning Organization, in May 2010. The Strategy, which is a guide on what to do to combat climate change, includes in detail the reduction, adaptation, financing and technology policies that Turkey will implement to the extent of its national opportunities and the availability of international financing and grants.

3.4.2. Climate Change Action Plan (2011-2023) (CCAP)

The Climate Change Action Plan, which was prepared in line with the objectives of the National Climate Change Strategy and the Ninth Development Plan, includes Turkey's policies and measures to reduce greenhouse gas emissions and adapt to climate change. CCAP basically consists of two main action plans, these are: the Greenhouse Gas Emission Control Action Plan and the Climate Change Adaptation Action Plan.

Various sub-actions were included in the CCAP for the targets included in the National Climate Change Strategy, and the responsible institutions/organizations and timing were specified for the realization of these activities. CCAP; It has a detailed technical content within the framework of short, medium and long-term targets under eight topics, including energy, industry, forestry, agriculture, buildings, transportation, waste and adaptation to climate change. In this context, actions related to institutional structuring and policy making, technology development and transfer, financing and economic instruments, data and information systems, training and capacity building, and monitoring and evaluation mechanisms of CCAP have been brought together.

3.4.3. Turkey's Climate Change Adaptation Strategy and Action Plan (2011-2023)

Turkey's Climate Change Adaptation Strategy and Action Plan, which is the first policy document on the development of Turkey's capacity to adapt to the effects of climate change, determined the vulnerability areas in five main areas across the country and defined extremely comprehensive targets and actions in these areas. These areas are: i) water resources management, ii) agriculture sector and food security, iii) ecosystem services, biodiversity, and forestry, iv) natural disaster risk management and v) human health.

3.4.4. National Declarations on Climate Change

As a party to the Paris Agreement, Turkey is obliged to prepare a National Communication on Climate Change every four years. Regarding the aforementioned reporting obligations, Turkey submitted the First Climate Change National Declaration in 2007 and the Fifth Climate Change National Declaration, which it prepared together with the second, third, fourth and fifth notifications, to the Convention Secretariat in 2013. The Sixth and Seventh National Declarations on Climate Change were sent to the Secretariat in March 2016 and December 2018, respectively. Finally, the Eighth National Declaration was submitted to the Secretariat as of December 2019.

3.4.5. Intended Nationally Determined Contributions

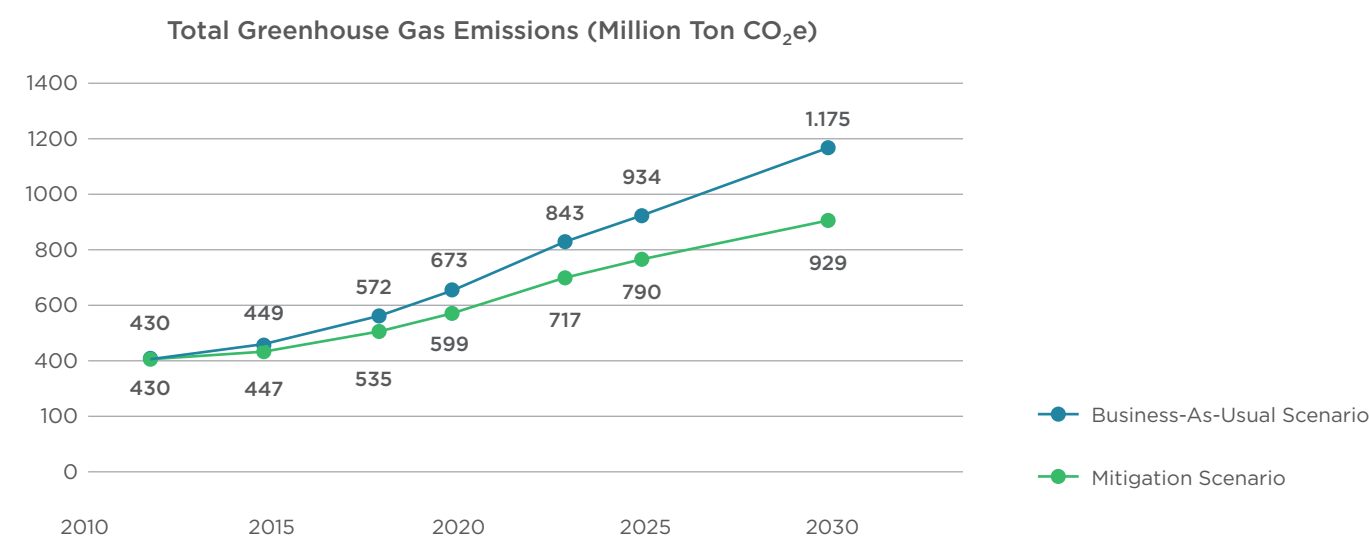
During the preparation process of the Paris Agreement, all parties set their policies and concrete (numerical) targets that they are determined to reduce greenhouse gas emissions and adapt to climate effects, in a way that supports the new cli-

mate regime under the Intended Nationally Determined Contributions (INDCs) to the UN Convention Secretariat. When this statement is examined, not only the quantified greenhouse gas emission reduction figures in the INDC of the countries, but also the issues included in each sub-title of the new global climate agreement (Paris Agreement) (plans for adaptation to the effects in climate struggle, policies for loss and damage, transition to climate-friendly technologies) and financing policies etc.) are understood to give concrete targets.

Turkey submitted its INDC to the Convention Secretariat in October 2015. With this document, Turkey has made the first formally quantified greenhouse gas reduction promise for the first time. Looking at INDC in terms of sectors, It is seen that there are many targets that will meet the needs in important areas such as: i) researches to increase the use of waste as an alternative fuel in the appropriate sub-sectors in the industry sector, ii) implementation of sustainable transportation approaches in urban areas in the transportation sector, iii) green building, passive energy for the purpose of minimizing the energy demand in the building sector and providing local energy production, dissemination of zero energy housing design, iv) rehabilitating pastures and supporting minimum tillage methods in the agriculture sector, reducing electricity transmission and distribution losses in the energy sector to 15% by 2030, v) sanitary landfills in managed and unmanaged landfills in the waste sector obtaining methane gas from the gas and vi) increasing the sink areas in the forestry sector and preventing land degradation.

It is envisaged that the emission reductions to be achieved with these policies and plans will be reduced from an increase of up to 21% in 2030, according to the reference scenario (business-as-usual).

Figure 18. National Declaration of Contribution Emission Reduction Scenario



Source: Turkey's National Declaration of Intent for Contribution-INDC

3.4.6. Turkey's 11th Development Plan (2019-2023)

Situation analysis is made for almost every sector, goals and targets are determined and the policies to be carried out in these areas are explained with the development plans, which are in the nature of a top policy document. Goals and policies regarding the main fossil fuel and climate-dependent sectors are also included in the development plan.

The preparations of the 11th Development Plan covering the period of 2019-2023 were arranged with the Prime Ministry circular published in the Official Gazette dated 29/07/2017, and 42 Special Expertise Commissions (SEC) and 32 Working Groups (WG) were formed to produce the reports that will form the basis of the plan. In the circular, it is emphasized that the SEC and WG studies will be carried out with a perspective on environmental protection, sustainable use and management of natural resources, qualified urbanization, reducing disaster risks, ensuring rural development, and sustainable and inclusive development. During the preparation process of the plan, no special expertise commission or working group was established directly on climate change.

The Development Plan has been prepared on the basis of the UN Sustainable Development Goals, which are planned to be implemented by 2030. Considering that the policies to combat climate change will act as an important bridge between the Paris Agreement and the Sustainable Development Goals, it is expected that this issue will be taken into account in the Plan targets.

3.4.7. Green Deal Action Plan

The “Green Deal Action Plan”, which aims to ensure adaptation to the policies to combat climate change, which has gained momentum in the international trade order in recent years, and which is a roadmap that will strengthen Turkey's competitiveness in exports, was published in July 2021.

The “Green Deal Action Plan” aims to support Turkey's transition to a sustainable and resource-efficient economy in line with its development goals, in the face of change and transformation in international trade and economy. In this direction, it is aimed to protect and develop competitiveness in exports, which is the locomotive of the Turkish economy, and to contribute to the deepening of the integration with the EU through the Customs Union.

The Action Plan, which was prepared in order to

adapt to the transformation in this area in a timely manner and to turn the risks to be faced into opportunities, especially the comprehensive changes envisaged by the European Green Deal announced by the EU, Turkey's most important trade partner, includes a total of 32 targets and 81 actions under 9 main headings.

3.4.8. Regulation on the Monitoring of Greenhouse Gas Emissions

The regulation, which entered into force by being published in the Official Gazette dated 25 April 2012 and numbered 28274, was later revised and published in the Official Gazette dated 17 May 2014 and numbered 29003, with the changes made in a number of articles.

Within the scope of the legislation, the facilities that perform the activities included in Annex-1 of the Regulation are subject to a regular monitoring, reporting and verification process every year. Monitoring Plans to be prepared within the scope of the Communiqué are submitted to the Ministry through the Environmental Information System. Following the approval of the Monitoring Plans, the facilities submit their verified “Emissions Reports”, which include their emissions between January 1st and December 31st, to the Ministry until April 30th each year.

Upcoming legislation and plans based on Climate

3.4.9. Climate Law

The Climate Law, which is expected to be completed in 2022, will include basic principles, responsibilities and actions. The main purpose of the Draft Climate Law is expressed as keeping the global average temperature increase limit below 2°C compared to the pre-industrial period, and in addition, limiting this increase to below 1.5°C. In order to achieve this basic goal, the following are targeted:

- i. Gradual reduction of greenhouse gas emissions in line with the principle of sustainable development;
- ii. Establishing the necessary legal and institutional framework for climate change adaptation, and
- iii. Determining the relevant technical and financial requirements to serve this purpose.

In order to achieve these targets, it is envisaged to switch to a low-carbon economic model, which is also included in the EU Green Deal.

The Draft Climate Law will cover activities aimed at reducing greenhouse gas emissions and adapting to climate change, as well as the rights and obligations of all real and legal persons carrying out these activities.

3.4.10. Emissions Trading System

The Climate Law will also regulate the establishment of various market-based mechanisms to encourage the reduction of emissions, especially the Emissions Trading System.

The ETS will be established with the aim of cost-effectively and measurable, reportable and verifiable reduction of greenhouse gas emissions across the country, taking into account the country targets communicated to the United Nations Framework Convention on Climate Change. It is envisaged to establish an emissions trading system based on the cap emission principle, which encourages limiting greenhouse gas emissions and activities that cause greenhouse gas emissions by trading greenhouse gas emission allowances.

4. CIVIL SOCIETY

4.1. What is Civil Society?

According to the European Commission definition, a Civil society Organisation is an organisational structure whose members serve the general interest through a democratic process, and which plays the role of mediator between public authorities and citizens. Civil society bridges the information, knowledge and capacity gap between governments and citizens or communities.

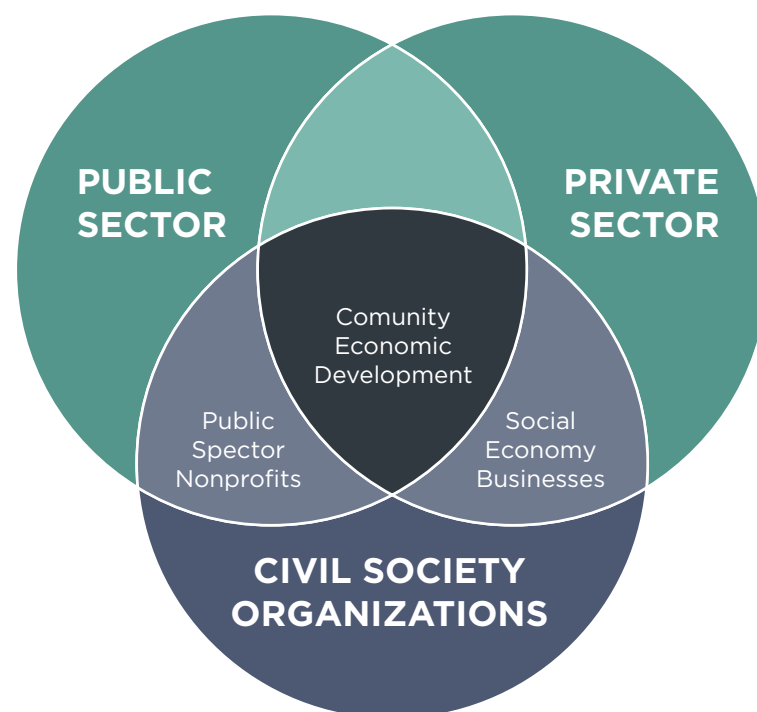
Civil society or the so called “third sector” of society, include all non-State, not-for-profit structures, non-partisan and non-violent, through which people organise to pursue shared objectives and ideals, whether political, cultural, social or economic (EC, 2012). For example it includes: business and sectoral associations, NGOs, think tanks and academia, human rights, peace and youth groups, trade unions and employers associations, network associations.

One of the principles of EU governance is to involve civil society in decision making. As a matter of fact, in **Article 15 of the Treaty on the Functioning of the EU (TFEU)** recognises civil society’s role in the European good governance.

Article 11 of the Treaty on EU (TEU) stresses the need for the EU to have an open, transparent and regular dialogue with civil society organisations, e.g., when preparing proposals for EU laws.

Additionally, the European Commission proposes an enhanced and more strategic approach in its engagement with local CSOs covering all regions, including developing, neighbourhood and enlargement countries, such as Turkey. It does so via the **Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions** on The roots of democracy and sustainable development: Europe’s engagement with Civil Society in external relations.

Figure 19. Understanding the Social Economy



4.2. Why is Civil Society Important?

Civil society plays a catalytic role in policymaking in a changing climate. Civil society can push for new laws, programmes, policies, or strategies on climate change, hold governments to account on their commitments and look after the interests of the vulnerable groups and most affected by climate change.

Some of the key aspects of civil society and its importance for the society are outlined below:

- An empowered civil society is a crucial component of any democratic system. It represents and fosters pluralism and contribute to more effective policies, equitable and sustainable development and inclusive growth (EC 2012)
- While States carry the primary responsibility for development and democratic governance, synergies between states and CSOs can help overcome challenges of unsustainable development (EC 2012)
- CSOs embody a growing demand for transparent and accountable governance (EC 2012)
- Contribute to social welfare by raising concern and awareness of economic injustices, socio-economic inequality, and environmental damage (Omelicheva 2009 and Smith 1998)
- Increase the number of access points to the policy process through demands for inclusion in feedback mechanisms and public consultation, and the creation of “shadow” conferences when access is denied (Chandhoke 2009)
- Facilitate the translation of policy preferences into policy proposals (Fung and Wright 2001)
- Helps to balance power between the established elites and working groups (Sorensen and Torfing 2005)
- Industrial associations have a key role in this as the pressure to act on climate change builds, and companies, in particular in the ‘hard to abate’ sectors, must demonstrate to their consumers and investors that they are aligning with a low carbon world.
- Improve the problem solving and decision-making capacity of governing institutions by increasing bottom-up participation (Sorensen 2005)
- Represent local interests and can help to mobilise and secure resources for the interests of local communities and constituencies.
- Play a catalytic role in building up community awareness of climate change and its likely impact on their lives, livelihoods, and habitats. They can help build up their capacities to undertake the needed adaptive actions to reduce vulnerability, mitigate risks and build resilience (WRI)

4.4. Channels for articulating into climate policy legislative processes EU and Turkey

EU

In the European Union, CSO’s can engage in policy development through different formal and informal participation processes. This can be done via executive bodies such as the European Commission, the European Parliament (EP) and the European Council (EC) or via consultative bodies such as the European Economic and Social Committee (EESC):

Table 2. Channels for articulating into climate policy legislative processes EU

Type of Body	Institutional Body	Channels	Example
Legislative Bodies	European Commission	Provide feedback at different stages of the legislative process of a policy	Have Your Say Platform
		Alliances and coalitions	Clean Hydrogen Alliance
		Advisory and Support Platforms	Just Transition Platform (technical & advisory support) and Platform on Sustainable Finance (advisory body)
		Expert Working Groups	High Level Expert Group on Energy-Intensive Industries
		EU Country Roadmaps for engagement with CSO’s outside the EU	EU-Peru Civil Society Engagement Roadmap
		Thematic Programme for Civil Society Organisations under the proposed NDICI-Global Europe	New programme 2021-2027
	European Parliament	Bilateral meetings with MEPs and MEPs assistants	Eurofer meets with CBAM Rapporteur Mohammed Chahim
		Sending proposed amendments in key stages of the legislative process	Eurelectric sends amendments for the revision of the ETS proposal
	European Council	Participate in national and local government processes and then depends on a case by case by Member State	Local polish community-based organization participates in the Upper Silesia TJTP drafting and planning
		Efficient participation processes and best prarctices	CEE Bankwatch creates a platform for sharing best practices of coal regions in transition in Eastern Europe
Consultative Body	European Economic and Social Committee (EESC)	The EESC produces opinions at the request of the Council, the Commission or the Parliament. It may also deliver opinions on its own initiative	The European Consumer Organisation participates to EESC policy processes

Turkey

Climate policy actors in Turkey can be divided into two main categories, governmental (state) and non-governmental.

State actors in Turkey’s administrative system include the Presidential Cabinet (the cabinet of ministers), ministries, public institutions and organizations affiliated with or related to the ministries, bureaucrats and experts working in these institutions, especially the Grand National Assembly of Turkey, where laws are made. Non-governmental actors are international organizations, the private sector (market), civil society organizations and professional organizations in the nature of public institutions, academia and the media. Citizens, on the other hand, exercise their right to obtain information, convey their views and participate through the media and/or non-governmental organizations and/or political parties and elections.

Climate policies are determined by the government within the framework of laws and resolutions adopted by the Assembly. Actors related to climate policy at the state level are much more numerous and diverse than in other similar issues. Contrary to policy areas that mainly concern one or a few sectors, climate change concerns many economic sectors and many ministries and public institutions regarding different aspects of the issue from foreign policy to science policy. For this reason, ministries and public institutions occupy a large volume in the actor map.

Non-governmental actors, on the other hand, try to influence the relevant decisions through commissions and boards established in the Assembly and Ministries. Civil Society Organizations constitute the largest and most diverse segment of non-governmental actors. The role of civil society organizations is often stimulating, mobilizing and compelling. The most important role of civil society is campaigns, actions, trainings, awareness-raising works, press releases etc. to keep the issue on the agenda, to criticize/develop government policies and, in some cases, to establish the relationship of the issue with other areas.

The organizations closest to the bottom in the civil society field are structured as networks or initiatives, and such structures are more effective through actions and campaigns. Among the environmental organizations that increase social awareness on climate change, develop policies and are influential as a pressure group and/or with their ex-

pertise, large environmental organizations and those with intellectual weight in the field of green thinking and ecology come first. It is seen that those who are more interested in climate change are organizations with stronger international connections.

Think tanks should be counted among the most influential organizations in the field of civil society. These organizations may be close to universities, the private sector or environmental organizations depending on their purpose, staff and field of work. Some think tanks may also work in close cooperation with the public.

4.5.Toolsforcampaigningandcommunication for civil society

Depending on the nature of the organization, there are multiple ways in which a CSOs can engage and articulate in climate policy development processes, including but not limited to:

- Advocacy and lobbying
- Capacity building and training
- Sharing best practices
- Technical research and offering policy suggestions
- Keeping track of legislative processes and providing inputs via position papers
- Cooperation and partnerships – aligning with other partners and/or relevant stakeholders and providing joint statements
- Organizing and participating in events and roundtable discussions
- Bilateral meetings with key stakeholders
- Demonstrations and protests
- Visibility and communication/outreach activities, including social media channels

4.6. Financing options for CSOs as enablers for policymaking

In the EU, funding constitutes an important component of the EU’s engagement with CSOs. Civil Society support comes through a variety of funding modalities including:

- Direct European Commission funding
- Public and government funding
- Membership fees

- Bilateral government support
- Multilateral organization support
- Pooled donor mechanisms and private donations

Within the direct EC funding there is: programme funding, direct award of grants, pool funding, follow-up grants, core-funding, co-financing, ring fencing, simplified calls and re-granting. Some examples of European funding programmes are:

- Europe for Citizens Programme (Civil Society Projects, Town Twinning and Networks of Towns)
- ERASMUS+ Key Action 3 Civil Society Cooperation
- LIFE Programme (funding instrument for the environment and climate action)
- Horizon Europe (largest EU research and innovation programme with funding for innovation projects)
- EUKI (project financing instrument by the BMU in Germany)

Lastly it is important to mention that within many EU Member States, the donations to local non-profit organizations are exempt from income tax.

4.7. Examples of efficient participation processes and best practices

4.7.1. Example 1: Just Transition Fund & Territorial Just Transition Plans

The Just Transition Fund (JTF) is the first pillar of the Just Transition Mechanism (JTM) and is a key tool to support regions dependent on fossil fuels (coal, lignite, peat, oil shale) and high-emission industries which will undergo a deep transformation in the following years. Preparation of Territorial Just Transition Plans (TJTPs) by Member States is a key condition for programming and subsequently implementing resources from the JTF.

Participatory framework of the JTF is based on the Partnership Principle, a key feature of Cohesion Policy and the Common Provisions Regulation (CPR) which stipulates that MS organise a comprehensive partnership, including at least regional and local authorities, economic and social partners, civil society and research institutions and universities. It implies also that these partners should also be involved throughout the preparation, implementation, and evaluation of JTF programmes and TJTPs.

With the above-mentioned principles and due to the nature of the regulation, the JTF is being implemented in a more decentralized manner compared to other instruments, with grants being disbursed on territories that have been identified by local authorities ensuring local participation and ownership of the processes. It is a bottom-up governance approach.

A specific best practice within the JTF is the the preparations of TJTPs in the Slovak Republic where they created thematic working commissions at regional level under partnership councils (state institutions, public sector, local governments, NGOs, business, etc.) for each of the JT regions. Particular focus and involvement have been dedicated also to youth groups.

In addition, the European Commission created the Just Transition Platform which is an efficient tool that provides technical assistance, fosters knowledge, sharing of good practices, capacity building and bilateral and multilateral exchange of views across all affected sectors and for a broad range of stakeholders.

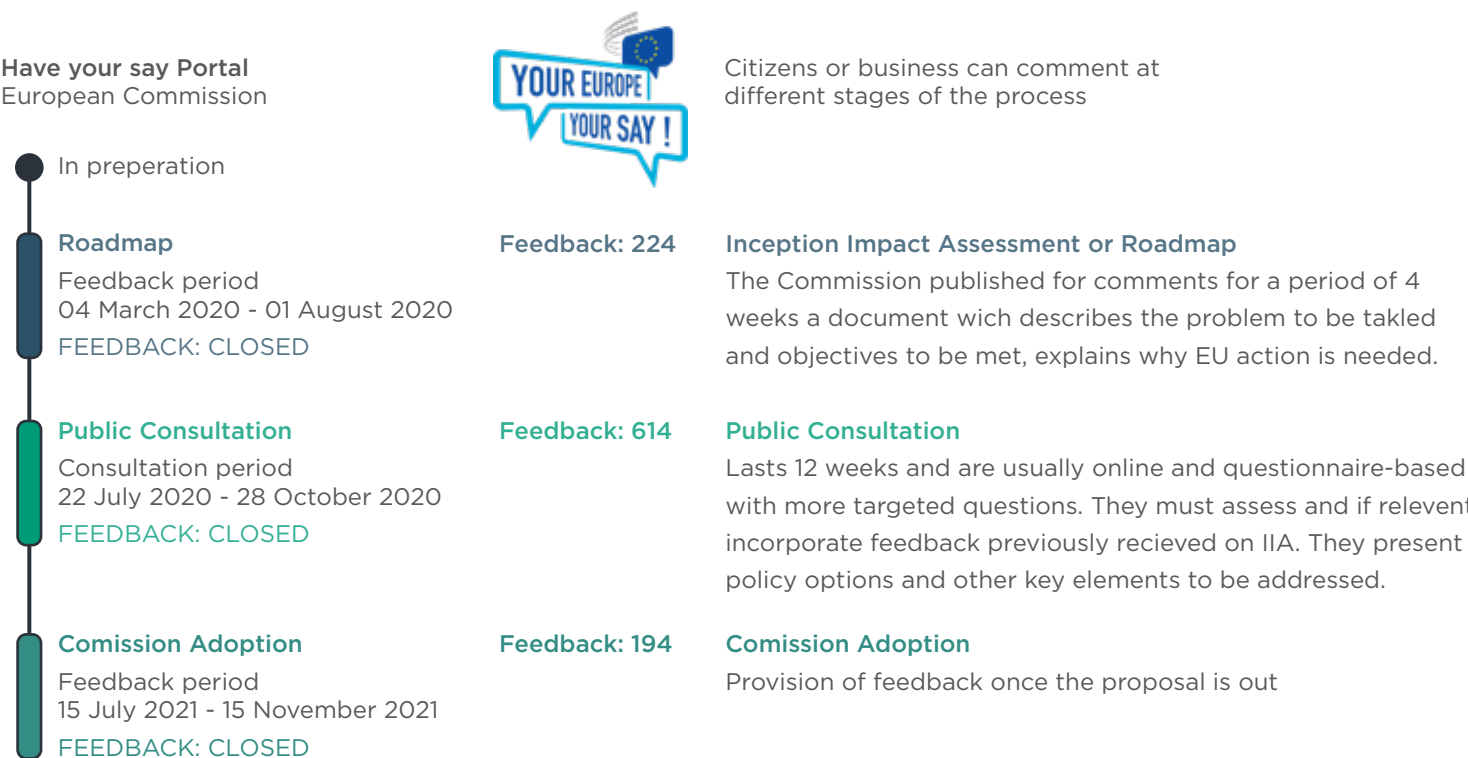
If adapted to the local context, the JTF and TJTPs governance framework could be an efficient tool for coal phase out in Turkey too.

4.7.2. Example 2: EU CBAM Feedback Procedure

The Have Your Say Portal, is a tool created by the European Commission through which Citizens and organizations can share their views and give feedback on roadmaps or impact assessments of upcoming legislation. In addition, everybody has the possibility to comment on draft delegated and implementing acts.

Stakeholders can also take part in 12-week public consultations on initiatives under preparation or evaluations of the performance of existing EU actions. These feedbacks are then reviewed one by one and taken into account in the draft legislation proposals.

Figure 20. Example of the Carbon Border Adjustment Mechanism feedback procedure



4.7.3. Example 3: Turkey Climate Council

Climate council meetings were organized immediately after the ratification of Paris Agreement and gathered a wide range of participants representing different interest groups. Despite some insufficiencies and the criticisms against the management of outcomes, it can still be considered as a good example due to its organizational purpose and short-term achievements.

Within the scope of the Council, it was aimed to deal with all aspects of climate change, which deeply affects Turkey and the world, to create special working groups on climate change, to contribute to the determination of medium and long-term strategy targets, to receive stakeholder opinions and suggestions, and finally to come up with recommendations.

The main purpose of the Climate Council is; It is to present the green transformation approach in a participatory manner by considering Turkey's new climate change vision within the framework of developing and changing conditions.

The Council commissions formed in line with the determined purpose and their working subjects are as follows:

1. Commission: Greenhouse Gas Reduction-1 (Energy, Industry, Transportation)
2. Commission: Greenhouse Gas Reduction-2 (Agriculture, Waste, Buildings, Sink Areas)
3. Commission: Science and Technology
4. Commission: Green Financing and Carbon Pricing
5. Commission: Adaptation to Climate Change
6. Commission: Local Authorities
7. Commission: Migration, Just Transition and Other Social Policies

All stakeholders, such as public institutions and organizations, universities, local governments, professional chambers, non-governmental organizations and private sector representatives invited to the council work, have taken their place in the relevant commissions in a balanced way, taking into account their fields of work, research, projects, experiences, duties and responsibilities.

5. BUILDING a VISION for CIVIL SOCIETY

Roadmap and recommendations

This roadmap aims to provide a blueprint for civil society for the next years to better structure CSOs' (and industries') strategies and action plans towards clear objectives, articulate into climate policy development processes and advance climate action.

The roadmap builds on the recommendations gathered during the consultations with civil society and the interactive workshops organized throughout the course of the project and which brought together local community, academic, and industry perspectives.

The roadmap recommendations are subdivided into three action fields for the different kinds of interactions that civil society have within the organization, with the government and in the international sphere.

First of all, the Civil Society specific action fields are described. These are the steps and actions that can be undertaken within the civil society organization itself or between associated civil society organizations, such as the sectoral associations that communicate between each other.

The second type of recommendations apply to the interactions between the government and civil society, where the government plays an important role in enabling, listening and including the recommendations from Civil Society. It is important to mention however that it is not the sole responsibility of the government to support Civil Society but of also of the private sector, international organizations, and the broader society.

The last kind of recommendations focus mainly on the interaction between European and Turkish Civil Society where support builds on the collaboration and cooperation of the two regions. It is to be noted however that this section is looked at with an international lens, especially when international climate policy mechanisms, such as Article 6 under the Paris Agreement, are considered.

5.1. Civil Society action fields

5.1.1. Create a common vision

Civil Society organizations with a clear vision of their position on a specific issue are more likely to have stronger influence in policy making. A Civil Society, whether it is a non-governmental organization (NGO), a community-based organization, a trade union or a sectoral or business association, has the role of representing the voices of their members and advocating for them in a clear and transparent manner.

It is within the role of the CSO to make sure that they create the right conditions for dialogue and mutual understanding to make sure that all the voices of their members are being heard. This can be done via participatory processes such as roundtable discussions, workshops, bilateral meetings, calls for inputs and surveys for their members and/or relevant stakeholders.

When a strong unified position is taken, then the CSO can enact this vision and provide policy suggestions, lobby, go to formal consultations, provide amendments, etc. (see Section 5.3 for the full list).

A good example of creation of a clear common vision can be taken from Fuels Europe, the leading European fuels and refinery association in the EU. In light of the ambitious climate targets in the EU, Fuels Europe decided to fully contribute to the Net Zero strategy and to promote low carbon fuels. With a clear long term vision, Fuels Europe is able to represent the interests of their members in the various European legislative processes and at the same time promote a new image of the industry in a low carbon future.

5.1.2. Enhance communication strategy and increase media outreach

Enhancing the communication strategy of a CSO is the next important step after a common and clear vision has been set. Outreach and media play a key role in public awareness and how the CSO organizes itself in this area will prove its success.

The communication paths in an organization can be external and internal and both have to be well established. In terms of external communication, there are three main types of communication through which CSOs can engage:

- Interpersonal communication: webinars, workshops, conferences, thematic events, peer visits, public hearings and ambassadors
- Electronic media: website, social media including Facebook, LinkedIn, Twitter, YouTube, blogs, newsletters, podcasts, emails, radio and TV
- Printed media: printed materials, posters and banners

Particularly, social media has occupied an important position in the last years as a communication tool and it offers engagement options with the broader virtual community via commentaries, polls, etc. Social media activism brings increased awareness about many societal issues.

For example, industrial associations have a key role in this as the pressure to act on climate change builds, and companies, in particular in the 'hard to abate' sectors, must demonstrate to their consumers and investors that they are aligning with a low carbon future. Industrial association must then build a strong communication and media outreach strategy that showcased the efforts of the industry to decarbonize.

5.1.3. Develop capacity within the organization

The European Commission adopts the OECD definition of capacity which states that 'capacity is understood as the ability of people, organizations, and society as a whole to manage their affairs successfully'. Developing capacity, therefore, is a key and ongoing process for any CSO. It improves all other activities and creates long-term structures, thereby ensuring the sustainable functioning of the CSO.

Capacity constraints frequently limit access to funding. To receive funding, CSOs must overcome these constraints which range from limitations in technical management and leadership skills to results management and issues of internal governance. Some technical skills which are typically required are the writing of proposals and reports as well as financial and process monitoring and reporting.

5.1.4. Secure funding for long-term operation

Funding and financing are a key enabler for CSOs' operation and empowerment. Many CSOs in Turkey lack the necessary funding for their day-to-day operations or to be able to expand. In addition to internal capacity constraints, mentioned above, the lack of availability and accessibility of funding is the main limitation for CSOs.

Support should be provided by the government, multilateral organizations, the private sector, and from within the EU. Alongside the availability of funding, it is important to ensure that the access routes and requirements for funding are understood by all CSOs and do not represent an unreasonable barrier. The EU's various funding schemes (see Section 5.5) can be considered as a possible best practice example for the development of a funding infrastructure in Turkey.

5.2. Government - Civil Society interaction

5.2.1. Avoid hard control mechanisms

The relationship between States and CSOs is often delicate and the space for civil society can turn out to be quite narrow or even shrinking. If support, e.g., public funding, is received, particular attention needs to be paid to 'hard control' mechanisms, where governments directly seek to steer the aims, activities, and existence of CSOs. The same can be said of funding from the private sector which is often provided to further individual business interests. Transparent funding mechanisms and criteria as well as the availability of a wide range of funding opportunities can help limit these concerns.

5.2.2. Involve a more diverse group of Civil Society Organizations in policy-making processes

There is a tendency to involve certain types of CSOs more than others, but in order to make use of the full range of knowledge and perspectives, it is important to involve a diverse group of CSOs in the policy process. NGOs have, in the past, been involved in these processes comparatively infrequently, but they have knowledge and connections which are particularly relevant when tackling environmental challenges.

NGOs in Turkey can play a decisive role in the prevention and response to heatwaves, fires and floods, and other natural disasters. They can help promote environmental awareness and engage with multiple environmental stakeholders through their ties to the civil society which they represent. They may have knowledge of the local ecology, thereby contributing valuable insights into the application of nature-based solutions, such as the conservation of forests, wetlands, and coral reefs.

5.2.3. Organize participatory processes for Civil Society

Accompanying policymaking processes with participatory processes for Civil Society is often associated with more balanced outcomes which have the support of the communities and actors who are responsible for implementation. However, to reap these benefits, certain criteria have to be met. CSOs have to be included systematically, instead of on an ad hoc basis, and the input they provide has to be seriously considered in the policymaking procedure.

Participatory processes such as the Have Your Say during public consultations or the bottom-up preparation approach of the TJTPs for the JTF, could be replicated and prove to be efficient mechanisms for CSOs' participation in the different policymaking processes in Turkey.

Similarly, Turkey's Climate Council is a good example of the more systematic integration of Civil Society in some of the working groups. Regular and participatory mappings are recommended, covering the diversity of actors, and including networks and platforms at national/sectoral level.

5.3. EU-Turkey Civil Society interaction

5.3.1. Focus on key EU and International climate policy developments

The EU is at the forefront of the global fight against climate change and has adopted ambitious climate policies as such. These new policies, as for example the EU CBAM, will have meaningful cross border economic impacts (See Box 1) and have triggered the Turkish government and businesses to strategic policy choices to manage the impact of CBAM, either via a domestic ETS or a carbon tax.

During the project's consultations, Turkish CSOs stated that the policies that concern them the most are: the EGD, the EU CBAM, the New CEAP, the renewable energy policies, Farm to Fork strategy and at the international level, Article 6 of the Paris Agreement (see Section 2.4).

CSOs in Turkey should be aware of the all the relevant European and international climate policy developments, build capacity and support their members to prepare for the impacts. Additionally, technical assistance for increased public understanding and enhanced stakeholder capacity on climate action, capacity building in the field of environment and implications of aligning with the EU's environmental objectives would prove useful.

5.3.2. Draw on EU and international lessons learnt and best practices

Most stakeholders have pointed out that sharing lessons learnt and best practices is a useful tool for CSOs to achieve their goals in the most effective and efficient manner. Best practices allow to achieve results that are superior to those accomplished by other means, while lessons learnt ensure that similar mistakes from the past are not repeated.

In the EU, research, and advocacy organizations such as E3G, CEE Bankwatch, Europe Beyond Coal provide valuable lessons learnt for coal regions in transition in the EU and support new regions that are in the process of transitioning from coal and fossil dependent activities.

In addition, the European Commission created the Just Transition Platform which is an efficient tool that provides technical assistance, fosters knowledge, sharing of good practices, capacity building and bilateral and multilateral exchange of views across all affected sectors and for a broad range of stakeholders (see Section 5.6)

Similarly Turkish CSOs could learn from best practices in order to support their regions and local communities to phase out coal and transition to cleaner energy sources.

5.3.3. Leverage opportunities from the evolving climate policy landscape

There has been notable progress in Europe's and Turkey's climate agenda. The EU Green Deal and its geopolitical impact can be considered as a new opportunity for CSOs for transformation of the Turkish economy towards sustainable development, if the right policies are put in place. Turkey has already issued the Turkish Green Deal Action Plan which aims to align with the EGD and increase the climate ambition in Turkey (see Section 3.4).

5.3.4. Way forward for EU-Turkey relations: enhance the EU-Turkey partnership in strategic fields including climate action

Regardless of the little progress made in Turkey's accession negotiations in the past years, Turkey has continued to align with the EU acquis especially in the climate front.

EU and Turkey have a multifaceted relation in key areas of joint interest, such as migration, economy, trade, climate action, energy security and renewables including green hydrogen, digitalization, health, agriculture and food security, research and innovation, infrastructure, and transport. Enhanced cooperation in these strategic fields of common challenges and opportunities, while maintaining regulatory alignment, would also support the reinvigoration of the EU integration process. This would, in turn, facilitate the implementation of the EU's sustainability goals and its global leadership in the climate action.

Dialogue mechanisms that are in place, such as the EU-Turkey Joint Consultative Committees (JCCs) under the European Economic and Social Committee and the Working Group Turkey under the Eu-

ropean Committee of the Regions are valuable tools that ease cooperation and political dialogue that should be maintained, fostered and supported.

Lastly, Turkish and European business community prioritize the launch of the Customs Union modernization as the most effective way to ensure Turkey's comprehensive alignment and integration into the European Green Deal and broader sustainability agenda.

5.3.5. Establish a platform for updating EU and Turkish CSOs on the most relevant climate policy developments

It is crucial that CSOs stay updated of the latest policy developments that are relevant for their organization and members. A shared platform for European and Turkish Civil Society with different policy areas could be useful for ensuring equal and timely information access on key climate developments. This should also be a platform where CSOs can provide feedback and inputs on specific policies.

The platform could be housed either by the European Commission, the Turkish Government or an external organization and information could be presented both in English and in Turkish. Such a platform would create a sustained and strengthened dialogue between European and Turkish civil society organizations.

CIVIL SOCIETY ACTION FIELDS

1. Create a common vision
2. Enhance communication strategy and increase media outreach
3. Develop capacity within the organization
4. Secure funding for long-term operation

GOVERNMENT-CIVIL SOCIETY INTERACTION FIELDS

5. Avoid hard control mechanisms
6. Involve a more diverse group of Civil Society Organizations in policy-making processes
7. Organize participatory processes for Civil Society

EU-TURKEY CIVIL SOCIETY INTERACTION FIELDS

8. Focus on key EU and International climate policy developments
9. Draw on EU and international lessons learnt and best practices
10. Leverage opportunities from the evolving climate policy landscape
11. Way forward for EU-Turkey relations: enhance the EU-Turkey partnership in strategic fields including climate action
12. Establish a platform for updating EU and Turkish CSOs on the most relevant climate policy development

Annex 1

Civil society organizations consulted: Cembureau, Eurometaux, FuelsEurope, TÜRKONFED, TUSIAD, Kadir Has University, YASED, Green Thought Association, GCCA+, IZKA, EBSO, WBCSD, ISO, WWF, Turkish Iron and Steel Association, Turkcimento, Istanbul Policy Center, Istanbul Technical University

Workshops held:

- July 6, 2021: EU-Turkey Climate Policy Dialogue: Opening Event
- October 6, 2021: EU-Turkey Climate Policy Dialogue: Deep dive on CBAM, ETS and the Just Transition Mechanism
- February 23, 2022: EU-Turkey Climate Policy Dialogue: Role of Civil Society in developing climate policies

